

Schedule of Proposed Main Modifications prepared by Gloucestershire County Council | April 2019

Note: This Schedule sets out Proposed Main Modifications (PMMs) to the Publication Minerals Local Plan for Gloucestershire (2018 – 2032). Proposed deletions are ~~strikethrough~~ and additional text is **bold and underlined**. Each PMM has been afforded a unique identifying reference and is clearly referenced back to the relevant paragraph, strategic objective or policy from the Publication Minerals Local Plan for Gloucestershire (2018 – 2032).

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
PMM 01	Policy MS01 (1 st sentence and the 1 st , 3 rd , 4 th and 5 th clauses, page 35)	<p>Revise the 1st sentence and the 1st, 3rd, 4th and 5th clauses of Publication MLP Policy MS01: -</p> <p>Non-mineral developments <u>proposals</u> within a Mineral Safeguarded Area (MSA) will be permitted provided: -</p> <ul style="list-style-type: none"> I. <u>it is they are</u> exempt from <u>safeguarding requirements</u> as set out in the list contained in table 2; or II. needless sterilisation of mineral resources will not occur; or III. <u>the mineral resources of concerned is are</u> not economically valuable; or IV. it is appropriate and practicable to extract <u>the-minerals</u> prior to development taking place; or V. the overriding need for <u>the</u> development outweighs the desirability to safeguard mineral resources. 	<p>In response to representation: 852145/6/MS01/USND.</p> <p>The representation raised concern about the process of mineral resource safeguarding within two-tier Gloucestershire. The modifications to the policy will improve readability and clarify how it will be applied in a proportionate, reasonable and justified manner.</p>
PMM 02	Supporting text to Policy MS01 (Table 2, page 37)	<p>Add a new bullet point item at the end of the list in Table 2 of Publication MLP page 37: -</p> <ul style="list-style-type: none"> • <u>All development considered under the 'Permission in Principle' consent route unless the Mineral Planning Authority specifically requests that a Mineral Resource Assessment is included on the local Brownfield Land Register entry or a 'Permission in Principle' decision notice.</u> 	<p>In response to representation: 852145/6/MS01/USND.</p> <p>The representation suggested additional non-mineral development types should be exempt from mineral resource safeguarding. After careful consideration these have been proposed as a modification.</p>
PMM 03	Supporting text to Policy MS01 (paragraph 122, pages 37-38)	<p>Revise Publication MLP paragraph 122: -</p> <p>A MRA will need to consider the site-specific nature of the mineral resources present along with an analysis of the relationship between these resources and the proposed non-minerals development. The MRA must meet PERC Reporting Standards <small>New footnote</small>. It must determine the category of mineral resources that are present (i.e. 'Inferred', 'Indicated' or 'Measured') and carefully analyse site-specific circumstances to determine whether there will be a risk of sterilisation from proposed non-minerals development. In addition to assessing In making a judgement, careful consideration will be given to technical details concerning the extent to which non-minerals development may affect access to currently worked</p>	<p>In response to representations: 924705/4/MS01/USND 808023/5/MS01/USND</p> <p>The representations raised concern as to the ability of the policy to effectively safeguard mineral resources by virtue of the matter being afforded sufficient and appropriate consideration at the planning application stage. The modification put forward seeks to expand local guidance to</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>minerals and / or unworked, but potentially exploitable, resources on the application site and / or nearby, within the sphere of influence of the proposal</p> <p>overlay mineral resources, attention should be given to accessibility issues affecting the potential to exploit unworked and currently worked resources. The risk of unreasonably curtailing / constraining permitted mineral working activities should also be investigated.</p> <p>New footnote PERC refers to Pan-European Reserves and Resources Reporting Committee Standard of Exploration, Results and Mineral Resources - http://www.percstandard.eu</p>	<p>ensure that applicants are in no doubt as to what is expected of them should they need to respond to mineral resource safeguarding matters.</p>
PMM 04	Policy MW01 (1 st clause, page 47)	<p>Revise the 1st clause of Publication MLP Policy MW01: -</p> <p>I. they will make a contribution towards maintaining throughout and at the end of the plan period an aggregate landbank requirement of at least 10 years for crushed rock or at least 7 years for sand & gravel, calculated using the rolling 10 years' sales based on the LAA rate data presented published in the <u>most recent</u> annual Gloucestershire Local Aggregates Assessment; and</p>	<p>In response to representations 808023/7/MW01/COM; 807759/1/MW01/COM</p> <p>The representations commented on the potential lack of flexibility in the policy regarding the approach to calculating aggregate landbanks. The modification proposed clarifies the use of relevant data sourced from the Local Aggregates Assessments (LAA) for Gloucestershire. This is the means by which aggregate landbanks should be kept up-to-date and able to maintain their relevance as supported by national policy.</p> <p>A draft Statement of Common Ground has been prepared in respect of the possible modification and representation: 807759/1/MW01/COM. This will hopefully be concluded in advance of the examination hearing sessions.</p>
PMM 05	Supporting text to Policy MW02 (paragraph 174, page 51)	<p>Revise the final sentence of Publication MLP paragraph 174: -</p> <p>In carrying out an assessment of sustainability, a review of the potential impacts on key designations will be required. Attention must be given to key designations present in the locality such as the valued landscapes of the Cotswolds and Wye Valley AONBs. The scale and significance of any impacts on the conservation of the landscape and scenic beauty, and ability to protect wildlife and cultural heritage will be of paramount importance. Meeting the relevant criteria set out in policies DM06, DM08 and DM09 and</p>	<p>In response to representations: 1169771/8/MW02/USND, 793504/3/MW02/USND; 793895/3/MW02/USND; 802358/3/MW02/USND; 1170897/2/MW02/USND; 794030/3/MW02/USND and 820738/3/MW02/USND</p>

Schedule of Proposed Main Modifications prepared by Gloucestershire County Council | April 2019

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>MR01 will be crucial. However, as supported by national policy, a degree of flexibility may be shown when analysing individual proposals for small-scale natural building stone workings, which are likely to operate over a protracted timescale, experience low rates of working and / or periods of intermittency. Subject to the merits of any given proposal and consideration of possible environmental impacts, on a case by case basis it may be justified for proposals to involve relatively low rates of extraction, periods of intermittent working and as a consequence, relatively longer planning permission timeframes than would otherwise be desirable⁸⁴.</p>	<p>The representations raised concern as to the ability of future proposals to prove their sustainable credentials in order to meet the 1st clause 1 of MLP Policy MW02. The modification makes clear as to the type of operational circumstances under which natural building stone can sometimes be worked, which should be taken into account.</p>
PMM 06	Supporting text to Policy MW02 (paragraph 176, page 51)	<p>Revise the 5th and 6th sentences of Publication MLP paragraph 176: -</p> <p>Natural building stone working may positively contribute to the economic well-being and cultural heritage of the county's rural local communities. This may arise through the direct and indirect employment opportunities being offered. Support for new or sustained local skilled labour, particularly traditional quarrying-related skills may be a noteworthy benefit. Appropriate provision for local apprenticeships secured either by way of a planning condition or a planning obligation could be materially significant⁸⁶. However, it is equally important to demonstrate how any potential negative economic impacts will be sufficiently outweighed avoided, mitigated or justifiably outweighed. An assessment, which identifies and then analyses the significance of any possible economic impacts on the future economic performance of other industries businesses that are operating locally and / or which are being promoted through regeneration and growth initiatives may represent justified and credible evidence. whose activities could be sensitive to environmental change brought about by proposals for mineral working, will potentially represent credible evidence in respect of this matter.</p>	<p>In response to representations: 793504/3/MW02/USND; 793895/3/MW02/USND; 802358/3/MW02/USND. 1170897/2/MW02/USND; 794030/3/MW02/USND and 820738/3/MW02/USND</p> <p>The representations raised concern that the supporting text fails to properly attribute the potential economic (amongst other) benefits of natural building stone for determining future proposals. In response, the modification clarifies what economic matters should be addressed both in terms of highlighting and maximising potential benefits, but also in addressing the possible occurrence of negative impacts.</p>
PMM 07	Policy MW06 (5 th clause, page 64)	<p>Revise the 5th clause of Publication MLP Policy MW06: -</p> <p>V. a positive contribution will be made to sustaining or growing the local economy and / or upholding cultural heritage throughout Gloucestershire.</p>	<p>In response to representation: 808023/9/MW06/COM</p> <p>The representation queries the application of the final clause of MLP Policy MW06 through the use of an example of a type of ancillary minerals development, which doesn't appear to fit with the policy requirement. The modification would address this by reducing the policy requirement to ensure that local economic</p>

Schedule of Proposed Main Modifications prepared by Gloucestershire County Council | April 2019

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
			benefits alone, without needing to demonstrate cultural heritage benefits could also be applied.
PMM 08	Supporting text to Policy MW06 (paragraph 217, page 65))	<p>Revise the 1st sentence of Publication MLP paragraph 217: -</p> <p>A comparative analysis will be required for ancillary mineral development proposals involving the importation of any minerals where existing, permitted alternative processing arrangements are potentially available nearby. Evidence as to why it is not practicable and / or viable to use alternative facilities will be necessary. The ability to achieve certain product specifications and / or to facilitate the creation of desirable blended products could be a reasonable justification, although this will need to be demonstrated through supporting evidence. In addition, information concerning the efficient movement of minerals could also prove to be significant. A justification will be necessary to show how allowing ancillary development rather than using alternative facilities will make a positive contribution to reducing transport-related impacts and / or greenhouse gas emissions by way minimising freight miles travelled or the use of more appropriate freight routes. The plans for site restoration and the impact on its timely delivery at the proposal site and alternative facilities should also be factored into the analysis.</p>	<p>In response to representations 794030/5/MW06/USND, 820738/5/MW06/USND, 793504/5/MW06/USND, 793547/4/MW06/USND, 793895/5/MW06/USND and 802358/4/MW06/USND</p> <p>The representations raised concern as to potential unreasonably onerous requirements for demonstrating the acceptability of ancillary mineral development proposals. In response the modification clarifies that a 'comparative analysis' of alternative options should only apply where importation of minerals for processing from elsewhere is proposed.</p>
PMM 09	Policy MA02 (1 st sentence and 1 st , 2 nd , 3 rd , 4 th and 5 th clauses, page 70)	<p>Revise 1st sentence and 1st, 2nd, 3rd, 4th and 5th clauses and add two new clauses (6th and 7th) to Publication MLP Policy MA02: -</p> <p>Mineral development proposals for aggregate working outside of allocations will be permitted only where one or more of the following it can be demonstrated: -</p> <p>I. the plan's allocations as set out in policy MA01 are not able to contribute towards maintaining minimum landbank levels in accordance with policy MW01; and/or</p> <p>II. constraints on the availability of existing permitted reserves and / or productive capacity are likely to limit output or restrict the range of available products over the plan period; and/or</p> <p>III. they represent the residual working of an area of aggregate mineral resource that is permitted or planned to be worked and would otherwise be impractical to exploit in any other way; and/or</p> <p>III. they represent the working of an area of aggregate mineral resource that is adjacent to / or within close proximity to an existing permitted aggregate working that would otherwise be impractical to exploit in any other way;</p> <p>IV. they will facilitate enhancements to previously approved plans for mineral restoration and the achievement of beneficial after uses that will outweigh the desirability to restrict</p>	<p>In response to representations: 793547/6/MA02/USND, 802358/6/MA02/USND, 808023/11/MA02/COM and 807759/2/MA02/SND</p> <p>The representations provided comments and concern over the type of aggregate working that would be considered justified outside of the plan's allocations. In response, the modification provides both clarification and sets out additional circumstances that could reasonably be taken into account. The most notable addition is specific provision for 'borrow pits'.</p> <p>A draft Statement of Common Ground has been prepared in respect of the proposed</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>working from outside of allocated areas; and / or</p> <p>IV. they would function as enabling development to allow an allocation for future aggregate working to be delivered or a permitted aggregate working to be worked in a more efficient manner;</p> <p>V. they will facilitate the working of aggregate minerals prior to non- minerals development taking place in accordance with policy MS01.</p> <p>V. they will not prejudice the delivery of previously approved restoration plans and facilitate materially significant enhancements to site restoration that will support the achievement of beneficial after-uses and satisfactorily meet the requirements of policy MR01 (Restoration, aftercare and facilitating beneficial after-uses);</p> <p>VI. they will facilitate the working of aggregate minerals prior to non-minerals development taking place in accordance with policy MS01;</p> <p>VII. they represent a borrow pit that is justifiably required to facilitate the delivery of a specific adjacent / or nearby development project and will be fully reclaimed as part of that project.</p>	modification and representation: 807759/2/MA02/SND. This will hopefully be concluded in advance of any potential examination hearing sessions.
PMM 10	Supporting text to Policy MA02 (paragraph 239, page 71)	<p>Revise the 1st, 2nd, 4th and 5th sentences of Publication MLP paragraph 239: -</p> <p>Aggregate working outside of allocations, which represents that is adjacent to / or within close proximity to an existing permitted aggregate working and would otherwise be impractical to exploit in any other way or enabling development, will need careful consideration. Proposals will be assessed on a case by case basis with regards to their size, scale and timeframe compared to the characteristics of the existing or planned for aggregate working site it relates to. Ensuring that mineral working in the locality will not be excessively extended will be a critical factor as will evidence of the operational, economic viability, amenity and / or environmental case for allowing non-allocated aggregate working to take place in the manner proposed.</p> <p>Furthermore, The deliverability of previously approved mineral site restoration and aftercare schemes must not be unduly affected inhibited. Although, where it is necessary to make any amendments to any existing revised mineral restoration and aftercare schemes for operational reasons, due consideration will be given to any potential enhancement opportunities that may be achieved (e.g. an increase in public access, improvement in the provision of green infrastructure, facilitating biodiversity gains or the creation of a landform that would be more sympathetic to the local landscape character), is submitted, this must be acceptable in principle and offer demonstrable benefits with regard to future land use opportunities.</p>	<p>In response to representations: 807759/3/MA02/SND, 1164737/35/MA02/USND, 793547/7/MA02/USND, 802358/7/MA02/USND 793547/7/MA02/USND and 802358/7/MA02/USND</p> <p>The representations provided comments and concern over the type of aggregate working that might be considered justified outside of the plan's allocations. In response, the modifications aim to provide clarification as what matters would reasonably be taken into account in respect of proposals for aggregate working related to existing or planned for aggregate working nearby.</p>
PMM 11	Supporting text to Policy MA02 (after paragraph 240, page 71)	<p>New paragraph to be inserted after Publication MLP paragraph 240: -</p> <p>A borrow pit cannot be precisely defined in terms of quantity of mineral worked or duration. However, in order for mineral working to be classified as such, a direct</p>	<p>In response to representation: 808023/11/MA02/COM</p> <p>In light of the modification proposed to</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>functional link between the exploitable mineral and the potential delivery of a specific, named development that is either subject to a planning application or benefits from a planning consent must be shown. The consequences of the relationship must also meaningfully contribute towards the achievement of sustainable development. To demonstrate this, evidence of environmental or other planning benefits compared to obtaining minerals from alternative sources will be necessary. In addition, all mineral operations must be tied to the development and the timeframe associated with site restoration and aftercare will need to be aligned with the completion of the development. A borrow pit is typically located next to, or nearby to the development it is supporting. It is also usually the case that any restoration materials that may be required will arise, at least in part, from the inert construction wastes of the supported development. However, under all circumstances site restoration of a borrow pit must be acceptable in planning terms having been appropriately assessed against the relevant development management plan policies from DM01 to DM11 and policy MR01.</p>	<p>Policy MA02, an additional explanatory paragraph is also presented.</p>
PMM 12	Supporting text to Policy DM01 (paragraph 272, page 78)	<p>Revise the 2nd sentence of Publication MLP paragraph 272: -</p> <p>Health Impact Assessments (HIAs) provide information to help decision-makers consider how a proposal might impact, directly or indirectly, on people's health and wellbeing. Mineral development proposals may benefit from the carrying out of an HIA, as public health and wellbeing status and needs are potentially important critical matters that should be considered taken account in the determination of planning proposals (New footnote to be included – Planning Practice Guidance (PPG), Health and wellbeing section, paragraph 001, reference ID: 53-001-20140306). decision-making process, as required by national policy. A successfully completed HIA should present sufficient evidence to determine whether potential significant health-related effects will arise from on-site mineral working and other associated activities such as restoration, the transportation of minerals and any importation, and where relevant, facilitated after-uses following restoration. HIA information may contribute to the reasoned justifications for why certain actions, such as mitigation measures will be necessary. An important feature of a HIA is that it offers a way of ensuring all sections of an affected community will be afforded sufficient scrutiny including those that already experiencing disadvantage and / or present vulnerable health characteristics.</p>	<p>In response to representations: 924705/7/DM01/USND, 808023/14/DM01/USND, 794030/7/DM01/USND, 820738/7/DM01/USND, 793504/7/DM01/USND, 793895/7/DM01/USND and 802358/9/DM01/USND</p> <p>The representations questioned the requirement to assess health impacts and considered the exercise to be onerous and unreasonable. The modification clarifies the status of health impact assessments.</p>
PMM 13	Supporting text to Policy DM01 (paragraph 273, page 79)	<p>Revise 1st, 2nd and final sentences of Publication MLP paragraph 273: -</p> <p>At the early preparation stage for minerals development proposals, a HIA screening exercise to establish the potential existence of significance health and wellbeing impacts should to be carried out is recommended. This must will assist in determining establish whether preparing a HIA would will represent the most efficient</p>	<p>In response to representations: 924705/7/DM01/USND; 808023/14/DM01/USND; 794030/7/DM01/USND; 820738/7/DM01/USND, 793504/7/DM01/USND;</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>and effective way of presenting supporting evidence on health and wellbeing matters and for establishing determining the level of detail that would be necessary. A HIA can be undertaken as a stand-alone assessment or integrated into a wider Environmental Statement, although in all instances it should be closely aligned with other technical investigations such as those covering environmental and transport impacts. In the event that a HIA is to be prepared, the screening exercise should provide a sound basis for understanding the size and nature of the local communities likely to be affected and to identify in the broadest of terms, what potential risks to and impacts on health and wellbeing could occur – positively and / or negatively and in terms of their significance.</p>	<p>793895/7/DM01/USND and 802358/9/DM01/USND</p> <p>The representations questioned the requirement to assess health impacts and considered the exercise to be onerous and unreasonable. The modification clarifies that the carrying of a specific standalone health impact assessment is not mandatory.</p>
PMM 14	Supporting text to Policy DM01 (paragraph 281, page 81)	<p>Revise the 4th sentence of the Publication MLP paragraph 281: -</p> <p>Mineral developments can impact upon local air quality. This may occur through the release of particulates from emissions and dust, and in some instances, through unpleasant odours. Air pollution can arise from on-site mineral working activities, but may also be caused by vehicles using unsurfaced roads, from wind blowing across stockpiles and quarry waste storage, and the exposure of unconsolidated, bare ground. An air quality impact assessment founded on the advice contained in planning practice guidance should be provided alongside may be necessary to accompany a mineral development proposal and the requirement for such an assessment, will be decided on a case-by-case basis having considered the nature and scale of development and the level of concern about air quality mineral development proposals¹³⁵. Where Assessments are required, they must take into account existing air quality levels prior to development and establish whether any new sources of air pollution are likely to arise and what their influence on existing air quality could be. The impact on air quality from changes to local traffic linked to minerals development both near to the site and / or further afield along defined freight routes will need to be included. Account should also be given to the scale, duration, hours of operation, type of activities being proposed; whether they are likely to be temporary or continuous and the existence of other operations in the same locality.</p>	<p>In response to representations: 924705/7/DM01/USND; 808023/14/DM01/USND; 794030/7/DM01/USND; 820738/7/DM01/USND; 793504/7/DM01/USND; 793895/7/DM01/USND and 802358/9/DM01/USND</p> <p>The representations raised broad concerns over the way in which amenity matters have been considered. In response, the modification clarifies the requirements as set out by national guidance for air pollution.</p>
PMM 15	Policy DM03 (part a, and part c, 1 st clause, page 87)	<p>Revise part a and part c of Publication MLP Policy DM03: -</p> <p>Part a Alternatives to road transport</p> <p>Mineral development proposals will be permitted where it is demonstrated that road-based transport will be minimised and that where possible, alternative and that use more sustainable, alternative modes of non-road transport will be used.</p> <p>Part c Public Rights of Way (ProW) Network and open access land</p> <p>Mineral development proposals will only be permitted where it can be demonstrated: -</p>	<p>In response to representations: 852145/13/DM03/USND; 820738/9/DM03/USND; 794030/9/DM03/USND; 924705/8/DM03/USND; 802358/11/DM03/USND; 793504/9/DM03/USND and 793895/9/DM03/USND</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>I. public rights of way routes and / or open access land will be retained and their safe use maintained, and unacceptable adverse impacts will be avoided or satisfactorily mitigated; and / or</p>	<p>The representations raised comments and concerns regarding the accuracy of the policy in adhering to the requirements of national policy and practice guidance. The modification clarifies the approach being taken by the MLP and improves readability, particularly in respect of responding to opportunities to use alternatives to road transport</p>
PMM 16	Supporting text to Policy DM03 (paragraph 303, page 88)	<p>Revise the 3rd sentence of Publication MLP paragraph 303: -</p> <p>For new mineral development proposals that use the local and / or strategic highway network, the potential for adverse impacts arising must be carefully scrutinised. National policy provides a clear threshold in this respect, focused on ensuring severe impacts on the highway network is prevented¹⁵¹. Particular issues <u>likely to be scrutinised that should be considered</u> include: - network capacity; <u>maintenance the impact upon the normal cycle of programmed highway maintenance</u>, safety of road users, debris on the highway and related amenity impacts such as noise, dust, vehicular vibration, and air and water pollution. These impacts may be of significance to a variety of sensitive receptors located along mineral haulage routes and not just those local communities that are close by to the proposal site.</p>	<p>In response to representation: 854632/3/DM03/USND</p> <p>The representation raised concern that unreasonable 'wear and tear' of the highway associated with mineral traffic was not afforded sufficient attention and therefore wouldn't be satisfactorily addressed. The modification clarifies that the matter is relevant and will be taken into account.</p>
PMM 17	Supporting text to Policy DM03 (paragraph 307, page 89)	<p>Revise the 2nd sentence of Publication MLP paragraph 307: -</p> <p>In the event potentially unacceptable adverse impacts are identified, information as to how these will be made acceptable will be critical. Mitigation measures <u>to this effect</u> might include specific infrastructure improvements or financial contributions towards work to the highway network, <u>including where justified to cover additional maintenance requirements</u>. Physical schemes may incorporate junction improvements and management, road widening along stretches of the highway, increasing visibility around site access and / or the construction of new accesses or junctions.</p>	<p>In response to representation: 854632/3/DM03/USND</p> <p>The representation raised concern that unreasonable 'wear and tear' of the highway associated with mineral traffic was not afforded sufficient attention and therefore wouldn't be satisfactorily addressed. The modification clarifies that the matter is relevant and will be taken into account.</p>
PMM 18	Policy DM04 (1 st clause, 2 nd clause, 3 rd clause, part a, part b, part c and part d, pages 91 to 93)	<p>Revise 1st, 2nd. and 3rd clauses; add new 4th, 5th, 6th, 7th and 8th clauses and a new bullet-pointed sentence; delete part a, part b and part c and replace part d with a new bullet-pointed sentence for Publication MLP Policy DM04: -</p> <p>Mineral development proposals will be permitted, where it can be demonstrated: -</p> <p>I. <u>they will be resilient to the impacts of flooding; there will be no increase in the</u></p>	<p>In response to representation: 1169920/2/DM04/USND</p> <p>The representation raised concern as to the soundness of the policy. In response, a significant possible modification is proposed that addresses each of the</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p><u>risk of flooding on site and elsewhere from all sources of flooding now and in the future;</u></p> <p>II. there will be no increase in the risk of flooding from all sources now and in the future; and <u>wherever possible, flood risk reduction initiatives will be incorporated that will achieve a reduction in the risk of flooding overall;</u></p> <p>III. wherever possible, flood risk betterment initiatives will be delivered. <u>appropriate measures will be put in place to manage and wherever possible, reduce surface water run-off including through the use of sustainable drainage systems (SuDS);</u></p> <p>IV. <u>wherever possible, a net increase in flood water storage capacity will be achieved;</u></p> <p>V. <u>where applicable, flood flow routes will be improved such as through the removal of obstructions;</u></p> <p>VI. <u>where applicable, there will be no detriment to the integrity of existing flood defences and that access to allow for their future maintenance or improvement will not be impeded;</u></p> <p>VII. <u>they accord with the policies contained in the River Severn, Severn Tidal Tributaries and Thames Catchment Flood Management Plans; and</u></p> <p>VIII. <u>any mineral processing plant, associated building(s), and / or equipment should be designed to remain operational, safe for users, and flood resilient during a flood event.</u></p> <p>The application of a sequential test that will favour the location of development within Flood Zone 1 is fundamental to assessing the acceptability of mineral developments and will be required as part of the supporting evidence for proposals. Mineral development proposals will only be permitted in areas of flood risk (Flood Risk Zones 2, 3a or 3b) having taken into account climate change, where they have passed the Sequential Test and, where applicable, the Exception Test as set out in national policy.</p> <p>Mineral development proposals involving sand and gravel working along with water-compatible development^(New footnote) may be appropriate within 'Flood Risk</p>	<p>matters identified.</p> <p>A Statement of Common Ground has also been prepared and co-signed in respect of the modification.</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>Zone 3b' or any identified 'functional floodplain', providing that: -</p> <ul style="list-style-type: none"> • there will be no net loss in flood storage and flood risk reduction measures (betterment opportunities) are provided where possible; • there will be no impediment to water flow routes; and • any mineral processing plant, associated building(s), and / or equipment is designed to remain operational, safe for users, and flood resilient during a flood event. <p>New Footnote - <u>Water compatible development types other than sand and gravel working is set out under Planning Practice Guidance (PPG), Flood risk and coastal change section, paragraph 066, reference ID: 7-066-20140306</u></p> <p>Part a Proposals located within Flood Zone 2</p> <p>Mineral development proposals will be permitted in Flood Zone 2, where it can be shown no reasonable alternative locations within Flood Zone 1 are available.</p> <p>Part b Proposals located within Flood Zone 3a</p> <p>Mineral development proposals will only be permitted in Flood Zone 3a, where they are classified as 'less vulnerable' or 'water compatible' and it can be demonstrated that no reasonable alternative locations are available within both Flood Zones 1 and 2.</p> <p>Part c Proposals located within Flood Zone 3b (the functional floodplain)</p> <p>Mineral development proposals will only be permitted in Flood Zone 3b, where it can be demonstrated:</p> <ol style="list-style-type: none"> they are classified as 'water compatible'; and there will be no net loss of floodplain storage, no impediment to water flows, and no increase in flood risk elsewhere; or wider sustainability benefits to the community exist that outweighs the risk of flooding as determined through an exception test. 	

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>Part d Proposals exceeding 1 ha within Flood Zone 1 and all other proposals within Flood Zones 2, 3a or 3b</p> <p>Mineral development proposals in areas of flood risk and where they exceed 1ha must be accompanied by a Flood Risk Assessment (FRA) that will show how the risk of flooding on-site and elsewhere from all sources will not increase and, where possible could be reduced. The FRA must identify and assess the following:</p> <ul style="list-style-type: none"> • all current and future sources of flooding, appropriately taking into account the anticipated impacts of climate change; • set out how flood risk on-site and elsewhere will be effectively managed for the lifetime of the proposal including during site restoration and aftercare; and • identify measures to prevent increased flood risk including through the use of sustainable drainage systems (SuDS) and compensatory works if any loss of flood storage capacity is expected to occur. 	
PMM 19	Supporting text to Policy DM04 (paragraph 322, page 94)	<p>Revise the 2nd and 3rd sentences of Publication MLP paragraph 322: -</p> <p>Mineral development proposals must be able to demonstrate how an increase in flood risk at their immediate location, elsewhere and in the future —(taking into account the impacts of climate change) will not occur. Climate Change Allowances have been published by the Government and these must be applied unless exceptional circumstances indicate alternative local assessments would be more appropriate. Engagement with the EA in respect of this matter will be necessary and should be undertaken at the earliest opportunity. All elements of minerals development must form part of the assessment of flood risk adhere to these requirements, including all built structures, the working of minerals themselves and also the carrying out of restoration and aftercare.</p>	<p>In response to representation: 1169920/3/DM04/USND</p> <p>The representation suggested additions and changes to the supporting text to Policy DM04. These are proposed as a possible modification.</p> <p>A Statement of Common Ground has also been prepared and co-signed in respect of the possible modification.</p>
PMM 20	Policy DM05 (1 st , 2 nd , 3 rd , 4 th , 5 th clauses, page 97)	<p>Revise 1st, 2nd, 3rd, 4th and 5th clauses to Publication MLP Policy DM05: -</p> <p>Mineral development proposals will be permitted where it can be demonstrated: -</p> <p>I. there will be no deterioration decline in water quality that would lead to a deterioration of EU Water Framework Directive (WFD) water body status and that measures to improve water quality and water body status will be incorporated wherever possible to help achieve good ecological status;</p>	<p>In response to representations: 794030/12/DM05/USND, 820738/12/DM05/USND, 793504/12/DM05/USND, 793895/12/DM05/USND, 802358/14/DM05/USND and 1169920/4/DM05/USND</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>II. they will not prejudice the quantity of water contained within water bodies; measures will be incorporated to enhance and protect water quality, including Gloucestershire's groundwater resources;</p> <p>III. due regard has been given to the actions and objectives of the Severn and / or Thames River Basin Management Plan (RBMP) in striving to protect and improve the quality of water bodies the actions and objectives set out in the Severn and / or Thames River Basin Management Plan (RBMP) will be supported in striving to protect and improve the quality of water bodies;</p> <p>IV. <u>Unless justifiable and agreeable change is achievable to the physical integrity of watercourses (New Footnote), they will be preserved and wherever possible enhanced, including riverside habitats. Where necessary, management and mitigation measures will be incorporated to improve and / or enhance water quality and habitats of aquatic environments in or adjoining the development site; and</u></p> <p>V. Wherever possible, measures to achieve the efficient use of water will be delivered <u>including incorporating appropriate water conservation techniques.</u></p> <p>New Footnote - A watercourse is defined as any channel through which water flows. Watercourses can be natural or man made, open on the surface or enclosed. Watercourses serve to drain the land and can assist in supporting flora and fauna. They include rivers, brooks, becks, ditches, streams, leats, goyles, rhynes and culverts.</p>	<p>Representation 1169920/4/DM05/USND raised notable concern as to the soundness of the overall policy. Whilst all other representations specifically focused on the approach to responding to watercourses affected by minerals development proposals. In response to the representations a significant modification is proposed.</p> <p>A Statement of Common Ground has also been prepared and co-signed in respect of part of the modification (changes to clauses i to iii and clause v) and representation: 1169920/4/DM05/USND.</p>
PMM 21	Supporting text to Policy DM05 (paragraph 335, pages 97 and 98)	<p>Revise Publication MLP paragraph 335: -</p> <p>Mineral development proposals <u>may benefit from</u> should be supported by a hydrological and hydrogeological assessment that provides <u>incorporates</u> an analysis of <u>risk to water quality and quantity</u> resources and how any possible adverse impacts will be avoided or mitigated. In line with planning practice guidance, <u>The assessment must be carried out where it is anticipated water quality impacts pose a significant</u> should identify the water bodies that represent potential planning concern — those directly affected through proposed modifications or as a consequence of indirect activities¹⁷⁸. The assessment must also consider the nature of potential adverse impacts upon identified</p>	<p>In response to representation: 1169920/5/DM05/USND</p> <p>The representation raised concern as to the content of the supporting text covering the assessment of hydrogeological matters. In response, a significant possible modification is proposed that addresses individual issues identified.</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>water bodies and the options for reducing impacts to acceptable levels including an analysis of the delivery of effective and deliverable mitigation measures. In certain circumstances a specific WFD Compliance Assessment may also be necessary. <u>A WFD Compliance Assessment will need to consider biological quality, physio-chemical conditions and hydro-morphological conditions of surface water bodies and quantity and chemical status of groundwater bodies. In line with planning practice guidance, the assessment of water quality should be undertaken where a proposal involves the physical modification of a water body and / or could indirectly affect a water body. Key aspects of the assessment should include the nature of potential adverse impacts upon identified water bodies and the options for reducing impacts to acceptable levels including an analysis of the delivery of effective and deliverable mitigation measures.</u> The <u>overarching</u> objective must be to demonstrate at least, how the current <u>WFD</u> status of identified water bodies will not suffer any deterioration.</p>	<p>A Statement of Common Ground has also been prepared and co-signed in respect of the modification.</p>
PMM 22	Supporting text to Policy DM05 (paragraph 336, page 98)	<p>Revise the 1st, 4th and 6th sentences to Publication MLP paragraph 336: -</p> <p>In preparing a hydrological and hydrogeological <u>The assessment of water quality and quantity impacts will need to pay</u> particular attention should be paid, where relevant to the Severn River and / or Thames River Basin Management Plans¹⁷⁹. These plans implement the WFD at the sub-national level by way of a catchment-based approach to water management, which will ensure a holistic view is taken over hydrological influences affecting a larger-than-local area. A catchment-based approach to water management is encouraged through planning practice guidance¹⁸⁰. The Severn River and Thames River Basin Management Plans identify key technical information concerning the hydrological characteristics of Gloucestershire and surrounding areas and set out actions to be taken to ensure <u>improvements, where possible, or to secure</u> there is no deterioration in the quality of water bodies from their current status. The plans also consider the means of delivering improved water quality status. Consequently, mineral development proposals should incorporate measures, wherever possible, that will contribute to the <u>improvements ambitions</u> outlined within the relevant River Basin Management Plan.</p>	<p>In response to representation: 1169920/5/DM05/USND</p> <p>The representation raised concern as to the content of the supporting text covering the assessment of water quality matters. In response, a modification is proposed that addresses individual issues identified.</p> <p>A Statement of Common Ground has also been prepared and co-signed in respect of the modification.</p>
PMM 23	Supporting text to Policy DM05 (paragraph 337, page 98)	<p>Revise the 4th and final sentence of Publication MLP paragraph 337: -</p> <p>Mineral development proposals involving dewatering activities should be supported by detailed technical evidence as part of a wider hydrological and hydrogeological assessment. The approach put forward must accord with advice published on this matter by the Environment Agency¹⁸¹. Furthermore, for locations which contain significant archaeological deposits, potential risks associated with dewatering will need to be careful scrutinised. Where minerals development proposals are located near to <u>could affect</u></p>	<p>In response to representations 794030/12/DM05/USND, 820738/12/DM05/USND, 793504/12/DM05/USND, 793895/12/DM05/USND and 802358/14/DM05/USND</p> <p>The representations identified a potential</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>watercourses, it will always be preferable for their physical integrity to be preserved. The provision of 'stand-off' strips or areas between the banks of the watercourse affected and mineral working may be an effective means of achieving this <u>and might</u> which may also present a number of complementary activities. Through the appropriate treatment of stand-off areas, visual and / or landscape impacts of mineral developments could be reduced (see policies DM01 and DM09). Stand-off areas may also be used to positively contribute to the management of flood risk (see policy DM04) and / or facilitate tangible biodiversity enhancements (see policy DM06) that in turn may aid the delivery of ecological improvements to the status of water bodies. <u>In the event that the integrity of a watercourse may be unavoidably affected, robust and credible evidence to justify this matter must be provided. All proposals under these circumstances will be rigorously scrutinised including through consultation with the Environment Agency and / or the Lead Local Flood Authority where necessary, to ensure that an acceptable and deliverable scheme is brought forward that will secure the least amount of change and / or alteration possible.</u></p>	<p>difficulty in the approach to mineral developments and watercourses. The modification to the supporting text reflects the changes proposed to Policy DM05 and clarifies how applicants should respond to proposals that may unavoidably affect the integrity of a watercourse(s).</p>
PMM 24	Policy DM06 (Part a and Part b, pages 101 to 103)	<p>Revise the 1st sentence of Part a and 2nd paragraph of Part B of Publication MLP Policy DM06: -</p> <p>Part a Biodiversity and geodiversity outside of designated areas</p> <p>Mineral development proposals that demonstrate the conservation of biodiversity and/or geodiversity, in addition to providing net gains where possible, will normally be permitted. Potential adverse impacts on natural environment assets must be avoided or satisfactorily mitigated in line with Gloucestershire Local Nature Partnership objectives. In exceptional circumstances, where an impact cannot be avoided or mitigated, then compensatory measures including the use of biodiversity and / or geodiversity offsets will be considered as a means to provide an overall net gain.</p> <p>Part b Designated sites and protected species</p> <p>Mineral development proposals which, alone or in combination with other plans and projects, are likely to have a significant effect on any Internationally Important Site designated as a Special Area of Conservation (SAC), Special Protection Area (SPA) or Ramsar site will only be permitted, where they have been subject to an Appropriate Assessment, which has determined that either:-</p> <ul style="list-style-type: none"> I. there will be no adverse effect upon the integrity of such designated sites; or II. where adverse effects on integrity have been concluded, has satisfactorily 	<p>The modification is sought to better align MLP policy with emerging Government policy on implementing 'biodiversity net gain'. Between December 2018 and February 2019, a consultation was carried out by DEFRA on how to make biodiversity net gain a necessity with development through the planning system in England. https://consult.defra.gov.uk/land-use/net-gain/. The modification removes 'where possible' from the text in order to clarify that the expectation is for the provision of net gain to be the normal state of affairs.</p> <p>The other modification is in respect to accurate naming of local environmental designations. As of February 2019, the Gloucestershire Local Nature Partnership re-named 'Key Wildlife Sites (KWS)' as 'Local Wildlife Sites (LWS)'.</p>

Schedule of Proposed Main Modifications prepared by Gloucestershire County Council | April 2019

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>addressed the subsequent stages in the Habitats Regulations Assessment (HRA) process as set out in table 3, which present imperative reasons of overriding public interest.</p> <p>Mineral development proposals will only be permitted within designated Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and in localities that could have an impact upon such designations, where it can be demonstrated: -</p> <ul style="list-style-type: none"> I. there will be no conflict with the conservation, management and enhancement of a designation; II. that any potentially harmful aspects of mineral development can be satisfactorily mitigated; and III. there would be no wider indirect and/or cumulative impact on the national network of SSSIs; or where the benefits of mineral development clearly outweigh the potential adverse impacts upon the key features of any designation. <p>Mineral development proposals on local sites that include Local Nature Reserves (LNR), Gloucestershire Key <u>Local</u> Wildlife Sites (<u>KLWS</u>) and Regionally Important Geological Sites (RIGS) and in localities that could have an impact upon such designations will be permitted where it can be demonstrated: -</p> <ul style="list-style-type: none"> I. adverse impacts can be avoided and /or satisfactorily mitigated; or II. where the benefits of minerals development clearly outweigh the potential adverse impacts upon the key features of any designation. <p>Mineral development proposals that could adversely affect legally protected species will only be permitted where it can be demonstrated that suitable safeguarding measures will be provided.</p>	
PMM 25	Policy DM07 (2 nd and 4 th clause, page 108)	<p>Revise the 2nd and 4th clause of Publication MLP Policy DM07: -</p> <p>Mineral development proposals will be permitted where they have been informed by and are sympathetic to the protection of soil resources by demonstrating: -</p> <ul style="list-style-type: none"> I. unacceptable adverse impacts on the quality of soil including as a result of disturbance and / or from contamination will be avoided or satisfactorily mitigated; and II. wherever possible, measures to achieve improvements in opportunities 	<p>In response to a review of the policy instigated by the comments made under representation 924705/10/DM07/USND. The modification does not seek to resolve the particular concern that has arisen. Instead, it is directed at improved alignment with national policy and guidance on soil protection matters.</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>for soil quality enhancement will be <u>delivered</u> facilitated; and</p> <p>III. where Best and Most Versatile Agricultural Land (BMVAL) is present, it will be avoided, or where this is not possible, it will be restored to the highest quality grade possible and any other potential adverse impacts will be kept to a minimum; or</p> <p>IV. the benefits of minerals development will clearly outweigh unacceptable adverse impacts on the quality of soil <u>and / or opportunities to achieve soil quality improvements</u> to justify the grant of planning permission <u>being granted</u>.</p>	
PMM 26	Supporting text to Policy DM08 (paragraph 372, page 112)	<p>Revise 1st sentence of Publication MLP paragraph 372: -</p> <p>However, in recognition that certain archaeological assets may not be identifiable or fully appreciated early on in the decision-making process, it <u>may be</u> <u>is</u> reasonable for a phased approach to be adopted for assessing significance and determining the subsequent treatment of assets, which involves initial desk-based assessment and / or field evaluations. A clear national framework for assessing the significance of heritage assets is provided by national policy, which sets out specific requirements of prospective applicants and expectations for determining planning authorities²⁰⁹. There is a necessity for the G-HER to be consulted and technical expertise should also be <u>sought</u> employed, where necessary.</p>	<p>In response to representation: 793641/2/DM08/COM</p> <p>The representation clarified that a staged / phased approach to the assessment of archaeology assets is wholly appropriate. The modification confirms this.</p>
PMM 27	Supporting text to Policy DM08 (paragraph 374, page 113)	<p>Revise the 1st and 2nd sentences of Publication MLP paragraph 374: -</p> <p>From a minerals planning perspective, the ability to maintain steady and adequate supplies of an important mineral is a material consideration that may <u>outweigh any</u> substantial degree of harm caused to the significance of an affected heritage asset. It <u>should however</u> <u>Nevertheless</u>, <u>be noted that attempts to avoid harm should be explored wherever it is possible to do so</u>. It is expected that to avoid harm, alternative options should first be considered.</p>	<p>In response to representations: 793641/2/DM08/COM, 820738/15/DM08/USND, 794030/15/DM08/USND, 802358/17/DM08/USND, 793504/15/DM08/USND and 793895/15/DM08/USND</p>
PMM 28	Supporting text to Policy DM10 (paragraph 397, pages 122 and 123)	<p>Revise 1st and 2nd sentence of Publication MLP paragraph 397: -</p> <p>National policy also makes provision for mineral <u>extraction</u> working to be allowed to take place in principle within the Green Belt where openness is preserved and no conflict will occur with purposes of the designation²³¹. <u>Evidence that considers both anticipated visual impacts and spatial effects of mineral extraction on the openness of the Green Belt will be required by decision makers</u>. This is reflective of the temporary nature and low intensity of any built structures such as certain forms of plant that usually</p>	<p>In response to representation: 793547/9/DM10/USND</p> <p>The representation commented on how the supporting text to Policy DM10 could assist in advising applicants how they should respond to the issue of Green Belt 'openness' with minerals development</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		accompanies this type of activity.	proposals. In response, the modification clarifies that there are two key components to an openness assessment – visual impact and spatial effects.
PMM 29	Policy MR01 (1 st clause, page 126)	<p>Revise the 1st clause of Publication MLP Policy MR01: -</p> <p>Mineral development proposals will be permitted where it can be demonstrated high quality restoration and aftercare will: -</p> <ul style="list-style-type: none"> I. take place at the earliest opportunity and without generating unacceptable adverse impacts; and II. be delivered to a high environmental standard; and III. facilitate beneficial after-uses that will contribute to the delivery of sustainable development. 	Clarification that all of the clauses contained to Policy MR01 apply in all instances.
PMM 30	Supporting text to Policy MR01 (paragraph 413, page 127)	<p>Revise the 2nd, 3rd and 4th sentences of Publication MLP paragraph 413: -</p> <p>Provision for site restoration and aftercare will be heavily dependent upon the nature of the minerals development under consideration and site-specific circumstances present at the time. For existing permitted workings, evidence will be required as to how previously agreed restoration and aftercare commitments will not be adversely affected. Existing planning conditions related to the cessation of operations, equipment removal and end-dates should not be compromised without justification. Proposals that seek to vary previously permitted restoration and aftercare schemes will be subject to rigorous scrutiny. Information must be presented to show how the environmental condition of previously approved development, will not be degraded. <u>Where restoration and aftercare proposals of permitted mineral workings need to be revised, careful consideration must be given to any potential adverse impacts on the envisaged, final environmental status of the site once it has been restored. In all cases the possibility of environmental degradation must be avoided. If revised restoration aims to deliver enhancement opportunities, these must be clearly identified in the supporting evidence.</u> Further enhancement opportunities deemed achievable through a modified restoration and aftercare scheme will be carefully assessed and only where positive change is materially significant and delivered to a high quality standard, will this be seen as beneficial. For more substantial mineral development proposals or those likely to involve a fundamental change to an existing restoration and aftercare scheme, will need to be accompanied by a detailed revised restoration strategy will be required.</p>	<p>In response to representation: 808023/26/MR01/USND</p> <p>The representation raised concern over the clarity of the supporting policy text relating to possible revisions to the restoration of permitted mineral workings. The modification seeks to better explain how such revisions to previously agreed restoration schemes should be presented by applicants.</p>
PMM 31	Supporting text to Policy MR01	Delete Publication MLP paragraph 427: -	In response to representations: 802358/22/MR01/USND,

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
	(paragraph 427, page 132)	<p>Possible benefits linked to importing materials for restoration purposes such as improving in soil conditions must be justified in terms of their wider sustainability credentials. This should include consideration of the proposed time period over which importation will occur; the impact importation may have on the timescales for completing restoration and facilitating the delivery of future beneficial after-uses; and the transport implications incorporating effects and significance on the safe and efficient functioning of the highway network and possible impacts on local actions for tackling climate change. Evidence used to show the relevant criteria of policies DM01, DM03, DM05, DM08, DM07 and DM09 have been met, could reasonably be applied in these circumstances.</p>	<p>793504/18/MR01/USND, 793895/18/MR01/USND, 820738/18/MR01/USND and 794030/18/MR01/USND</p> <p>The representations raised concern as to the introduction of additional requirements that unjustifiably go beyond the policy. The modification to delete the paragraph acknowledges this interpretation by respondents. It is also noted that sufficient guidance on how to present the case for allowing the importation of materials for restoration is provided elsewhere in the supporting text.</p>
PMM 32	Supporting text to Policy MR01 (paragraph 428, page 132)	<p>Revise the 1st and final sentence of Publication MLP paragraph 428: -</p> <p>Importing <u>recovered waste</u>²⁵⁹ for use in mineral restoration may be considered <u>a recovery operation that is</u> acceptable as outlined in paragraph 4.43 of the adopted Gloucestershire Waste Core Strategy²⁶⁰. Imported waste suitable for mineral restoration but managed by way of disposal to landfill, might also be justified²⁶¹. However, For the latter, the relevant criteria contained within adopted Gloucestershire Waste Core Strategy policy WCS 8 (Landfill) <u>(or future replacement)</u> will need to be successfully addressed²⁶².</p>	<p>In response to representations: 808023/26/MR01/USND; 793547/10/MR01/USND 802358/22/MR01/USND, 793504/18/MR01/USND, 793895/18/MR01/USND, 820738/18/MR01/USND; and 794030/18/MR01/USND.</p> <p>The representations raised concern as to how imported materials for restoration purposes, which could be categorised as waste, will be dealt with. Whilst a number of points made are contested, a modification would be beneficial for clarity purposes.</p>
PMM 33	Appendix 4 ('Water resources' theme of Allocation 02: Land west of Drybrook Quarry, page 153)	<p>Revise the Water resources theme for Publication MLP Allocation 02: -</p> <p>A hydrological / hydrogeological impact assessment in accordance with EA guidance will be required. As the underlying geology of the allocation is classified as a Principal aquifer, attention will need to be given to identifying and quantifying risks associated with all possible minerals-related development activities (e.g. working, processing and site restoration) to groundwater resources and for establishing a stringent monitoring regime commencing at least 12-months prior to development, continuing throughout the</p>	<p>In response to representation: 1169920/7/AL02/COM</p> <p>The representation advised on improvements to the detailed development requirements for the allocation to take account of Water Framework Directive (WFD) matters. The modification responds</p>

Schedule of Proposed Main Modifications prepared by Gloucestershire County Council | April 2019

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>operational phase and including site restoration and aftercare. In addition, potential hydrological impacts on nearby surface water bodies (within 1km) will require scrutiny. These includes: - Cinderford Brook to Blackpool Brook, Dry Brook, Bailey Brook, Lodgegrove Brook and the quarry lagoons within the existing Drybrook Quarry. Although a more definitive sphere of hydrological influences will need to be established through a Water Features Survey. This could identify other and / or more distant surface water bodies that are also worth assessing along with other relevant receptors. Possible cumulative / incombination hydrological / hydrogeological impacts associated with permitted mineral working and other related activities should also be considered such as proposed restoration and aftercare at the existing Drybrook Quarry. The HIA must scrutinise the need to employ mitigation and where necessary provide a strategy for implementation. It must also incorporate a strategic, catchment-scale view of water resource management and identify how development of the allocation may positively contribute towards protecting and improving the water environment in line with the Severn River Basin Management Plan (RBMP)²⁸¹ and Wye and Severn Vale Catchment Management Plans <small>New web linked footnote - https://www.gov.uk/government/collections/catchment-flood-management-plans</small></p>	<p>accordingly to the advice.</p> <p>A Statement of Common Ground has also been prepared and co-signed with the respondent in respect of the modification.</p>
PMM 34	Appendix 4 ('Water resources' theme of Allocation 03: Depth extension to Stowfield Quarry, page 159)	<p>Revise the Water resources theme for Publication MLP Allocation 03: -</p> <p>A hydrological / hydrogeological impact assessment in accordance with EA guidance will be required. As the underlying geology of the allocation is classified as a Principal aquifer, attention will need to be given to identifying and quantifying risks associated with all possible minerals-related development activities (e.g. working, processing and site restoration) to groundwater resources and for establishing a stringent monitoring regime commencing at least 12-months prior to development, continuing throughout the operational phase and including site restoration and aftercare. In addition, potential hydrological impacts on nearby surface water bodies (within 1km) will require scrutiny. These includes: - Whippington Brook, an unnamed drain, tributary and pond at Swan Pool, and the lagoon within Stowfield Quarry. Although a more definitive sphere of hydrological influences will need to be established through a Water Features Survey. This could identify other and / or more distant surface water bodies that are also worth assessing along with other relevant receptors. Possible cumulative / in-combination hydrological / hydrogeological impacts associated with permitted mineral working and other related activities such as proposed restoration and aftercare at the existing Stowfield Quarry should also be considered. The HIA must scrutinise the need to employ mitigation and where necessary provide a strategy for implementation. It must also incorporate a strategic, catchment-scale view of water resource management and identify how development of the allocation may positively contribute towards protecting and the improving water environment in line with the Severn River Basin Management</p>	<p>In response to representation: 1169920/8/AL03/COM</p> <p>The representation advised on improvements to the detailed development requirements for the allocation to take account of Water Framework Directive (WFD) matters. The modification responds accordingly to the advice.</p> <p>A Statement of Common Ground has also been prepared and co-signed with the respondent in respect of the modification.</p>

Schedule of Proposed Main Modifications prepared by Gloucestershire County Council | April 2019

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		Plan (RBMP) ²⁸⁶ and Wye and Severn Vale Catchment Management Plans. <small>New web linked Footnote - https://www.gov.uk/government/collections/catchment-flood-management-plans</small>	
PMM 35	Appendix 4 ('Water resources' theme of Allocation 04: Land northwest of Daglingworth Quarry, page 164)	<p>Revise the Water resources theme for Publication MLP Allocation 04: -</p> <p>A hydrological / hydrogeological impact assessment in accordance with EA guidance will be required. As the underlying geology of the allocation is classified as a Principal aquifer, attention will need to be given to identifying and quantifying risks associated with all possible minerals-related development activities (e.g. working, processing and site restoration) to groundwater resources and for establishing a stringent monitoring regime commencing at least 12-months prior to development, continuing throughout the operational phase and including site restoration and aftercare. The allocation also lies within a Source Protection Zone 1 (SPZ1). This will require a very specific risk assessment to be carried out to consider potential pollution of potable water supplies and other sensitive commercial water supplies. Beyond the allocation, potential hydrological impacts on nearby surface water bodies (within 1km) will require scrutiny. These include: - Elkstone Brook and Daglington Stream. Although a more definitive sphere of hydrological influences will need to be established through a Water Features Survey. This could identify other and / or more distant surface water bodies that are also worth assessing along with other relevant receptors. For example, the River Churn is just over 3 km to the South East of the allocation. Possible cumulative / in-combination hydrological / hydrogeological impacts associated with permitted mineral working and other related activities such as proposed restoration and aftercare at the existing Daglingworth Quarry should also be considered. The HIA must scrutinise the need to employ mitigation and where necessary provide a strategy for implementation. It must also incorporate a strategic, catchment-scale view of water resource management by identifying how development of the allocation may positively contribute towards protecting and the improving water environment in line with the Thames River Basin Management Plan (RBMP) and also the Severn RBMP, which covers an area that may be within the sphere of influence of the allocation²⁹¹ and Thames Catchment Management Plans <small>New web linked Footnote - https://www.gov.uk/government/collections/catchment-flood-management-plans</small></p>	<p>In response to representation: 1169920/9/AL04/COM</p> <p>The representation advised on improvements to the detailed development requirements for the allocation to take account of Water Framework Directive (WFD) matters. The modification responds accordingly to the advice.</p> <p>A Statement of Common Ground has also been prepared and co-signed with the respondent in respect of the modification.</p>
PMM 36	Appendix 4 ('Historic environment including archaeology' theme of Allocation 04: Land northwest of Daglingworth Quarry, page 165)	<p>Revise the final sentence of the historic environment including archaeology theme for Publication MLP Allocation 04: -</p> <p>A Heritage Statement (HS) will be required to establish the presence of heritage assets that could be affected and to assess the nature, extent and importance of their significance and their settings. The HS must also provide a detailed analysis of potential impacts and their envisaged significance associated with all activities related to the working of the allocation. Where the potential for adverse impacts is identified, details of</p>	<p>In response to representation: Rep 793641/5/AL04/COM</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>the means of avoiding such impacts or delivering sufficient mitigation to eradicate and / or reduce their significance to an acceptable degree must be included. The prime focus should be on the preservation of key heritage assets. A proportionately detailed, reasoned justification will be necessary in every instance that harm to, or the potential loss of a heritage asset is envisaged. Information regarding how recording and / or the excavation of heritage assets may also be necessary. The HS must be comprehensive in its coverage by considering both designated and undesignated heritage assets including those of potential archaeological interest. Information contained on the Gloucestershire Historic Environment Record (G-HER) should be interrogated along with the National Heritage List (NHL) produced by English Heritage. Of potential relevance <u>that could result in restrictions upon future working proposals</u>, to the allocation is the grade II listed milestone (NL list entry: 1090206); <u>a possible Bronze Age barrow</u>; and the linear, <u>and an</u> earthworks <u>that borders the</u> located close to the south eastern boundary <u>of the allocation and forms part of the late Iron Age / early Roman settlement of</u>. Other archaeological features associated with the historic settlement of Bagendon. may need investigation.</p>	
PMM 37	Appendix 4 ('Water resources' theme of Allocation 05: Land south and west of Naunton Quarry, page 170)	<p>Revise the Water resources theme for Publication MLP Allocation 05:-</p> <p>A hydrological / hydrogeological impact assessment (HIA) in accordance with EA guidance will be required. As the underlying geology of the allocated units has been classified as a Principal aquifer, attention will need to be given to identifying and quantifying risks associated with all possible minerals related development activities (e.g. working, processing and site restoration) to groundwater resources and for establishing a stringent monitoring regime commencing at least 12-months prior to development, continuing throughout the operational phase and including site restoration and aftercare. In addition, potential hydrological impacts on nearby surface water bodies (up to 3km) will require scrutiny. These includes: - the River Windrush, River Eye, several springs feeding an unnamed tributary of the Windrush; and small ponds and a small lake that are linked to existing and previous mineral working at the existing Naunton Quarry. Although a more definitive sphere of hydrological influences will need to be established through a Water Features Survey. This could identify other and / or more distant surface water bodies that are also worth assessing along with other relevant receptors. Possible cumulative / in-combination hydrological / hydrogeological impacts associated with permitted mineral working and other related activities should also be considered such as proposed restoration and aftercare proposals at the existing Naunton Quarry and also the nearby Tinker's Barn Quarry. The HIA must scrutinise the need to employ mitigation and where necessary provide a strategy for implementation. It must also incorporate a strategic, catchment-scale view of water resource management by identifying how development of the allocated units may positively contribute towards protecting and the</p>	<p>In response to representation: 1169920/10/AL05/COM</p> <p>The representation advised on improvements to the detailed development requirements for the allocation to take account of Water Framework Directive (WFD) matters. The modification responds accordingly to the advice.</p> <p>A Statement of Common Ground has also been prepared and co-signed with the respondent in respect of the modification.</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>improving water environment in line with the Thames River Basin Management Plan (RBMP) and the Severn RBMP, which covers an area that may be within the sphere of influence of the allocation²⁹⁶ <u>and Thames Catchment Management Plans</u> <small>New web linked Footnote - https://www.gov.uk/government/collections/catchment-flood-management-plans</small></p>	
PMM 38	Appendix 4 ('Economic development' theme of Allocation 06: Land south east of Down Ampney, page 174)	<p>Revise the Economic development theme for Publication MLP Allocation 06:-</p> <p>An Economic Impact Assessment (EIA) <u>should be carried out</u> will be required to identify potential economic impacts and their significance as a result of aggregate working taking place at land south east of Down Ampney. <u>The Whether a dedicated EIA is prepared or related information is to be presented as part of another type of assessment, it</u> must establish whether current local economic conditions are likely to be influenced and the scale and significance of any positive contribution to economic well-being at the local, sub-national and national levels, having taken into account the occurrence of possible negative economic impacts. The EIA should be based on a balanced and credible analysis of evidence that has been published and / or has been robustly generated to support the proposal. Information concerning the potential impact on local employment both direct and indirectly will be crucial. The prospect of new jobs being generated should be highlighted. Commitments to secure employment and training opportunities that will benefit local communities (e.g. provision of local apprenticeships) will be best placed set out within the EIA. This is in addition to any evidence to show how existing direct and indirect employment will be safeguarded. The possibility that existing non-minerals related local businesses and / or permitted emerging enterprises could be exposed to undue economic risk from aggregate working starting up at land south east of Down Ampney must be explored. The nature of any risks to other businesses, their likely significance and any proposed means of mitigation will need to form part of the EIA.</p>	<p>In response to representation 808023/29/AL06/SND</p> <p>The representation questioned the requirement to assess economic impacts and considered the exercise to be onerous and unreasonable. The modification clarifies that the carrying out of a specific standalone economic impact assessment is not mandatory and that the issue can be dealt with within other assessments. It also infers that an initial 'scope' should be completed and that this will dictate how much assessment work will actually need to be undertaken.</p>
PMM 39	Appendix 4 ('Highways' theme of Allocation 06: Land South east of Down Ampney, page 175)	<p>Revise the 2nd sentence and last sentence of the highways theme for Publication MLP Allocation 06: -</p> <p>A Transport Assessment (TA) will be required. Advice on the necessary content of a TA should be sought from the Local Highway Authority, Highways England and also the neighbouring Local Highway Authority for Wiltshire (Wiltshire Council) at the earliest possible opportunity as part of pre-application preparations. Highways matters, which will need to be investigated include: - the creation of a safe and suitable means of vehicular access that will achieve the shortest possible route to the A419; <u>the requirement to include measures to avoid undue harm to the structure of the local highway and / or to adequately provide for any highway repairs attributable to vehicular movements associated with minerals development from within the allocation; and the avoidance</u>, wherever possible, of associated vehicular movements through the</p>	<p>In response to representation: 854632/4/AL06/USND</p> <p>The representation raised concern about the failure to properly identify all reasonable potential highway-related contributions that should be considered. The modification seeks to address this matter accordingly. In addition, it is understood the Gloucestershire Freight Gateway is due to be replaced in the near future. As such additional text to acknowledge this circumstance has been</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>locally significant settlement of Latton; and the establishment of acceptable freight routes using the A419, which do not create a conflict with Gloucestershire Local Transport Plan policies LTP PD 3.1 and LTP PD 3.4, and follow the advice contained within the Gloucestershire Freight Gateway <u>or its future replacement</u>, In addition, where it is relevant, consideration should be given to the Wiltshire Local Transport Plan Freight Strategy.</p>	<p>provided.</p>
PMM 40	Appendix 4 ('Water resources' theme of Allocation 06: Land South east of Down Ampney, page 176)	<p>Revise the Water resources theme for Publication MLP Allocation 06: -</p> <p>A hydrological / hydrogeological impact assessment in accordance with EA guidance will be required. The superficial deposits of the allocation host a Secondary 'A' shallow aquifer for which little information is known as to its properties. Consequently, a detailed analysis of the existing local groundwater regime will be essential. The assessment must also afford attention to identifying and quantifying groundwater risks associated with all possible minerals-related development activities (e.g. working, processing, site restoration including aftercare) and establish a stringent monitoring regime commencing at least 12-months prior to the commencement of the development, continuing throughout the operational phase and including site restoration and aftercare. The allocation mostly lies within a Source Protection Zone 2 (SPZ2) although a small area falls within a Source Protection Zone 1 (SPZ1). A very specific risk assessment will therefore need to be carried out to consider potential pollution of potable water supplies and other sensitive commercial water supplies <u>in order to demonstrate there will be no significant environmental impacts and that appropriate protection and / or mitigation and management measures will be put in place. Any landfill or deposit for recovery (DfR) activities will require an appropriate EA permit. Advice from the EA in respect of this matter should be sought at earliest opportunity and parallel tracking of the planning application with the relevant EA permit is strongly encouraged.</u> Beyond the allocation, potential hydrological impacts on nearby surface water bodies (up to 3km) will require scrutiny. These include: - Marston Meysey Brook; Ampney and Poulton Brooks; River Thames (from the River Churn to River Coln); River Churn (Baunton to Cricklade); Thames & Severn Canal; a number of unnamed tributaries and drains to the River Thames and Ampney Brook; and several ponds and lakes some of which can be traced back to previous and existing mineral workings in the locality. Although a more definitive sphere of hydrological influences will need to be established through a Water Features Survey. This could identify other and / or more distant surface water bodies that are also worth assessing along with other relevant receptors. Possible cumulative / incombination hydrological / hydrogeological impacts associated with nearby permitted mineral workings and other related activities such as restoration and aftercare should also be considered. This includes: - Whetstone Bridge Quarry and Roundhouse Farm Quarry and Eysey Manor Quarry (the final two are located across the</p>	<p>In response to representation: 1169920/11/AL06/USND</p> <p>The representation advised on improvements to the detailed development requirements for the allocation to take account of the Water Framework Directive (WFD); the existence of a Source Protection Zone (SPZ) and potential landfill permitting matters. The modification responds accordingly to the advice.</p> <p>A Statement of Common Ground has also been prepared and co-signed with the respondent in respect of the modification.</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>administrative border in Wiltshire). An early up-to-date survey of the status of nearby mineral workings would be beneficial to this exercise. The HIA must scrutinise the need to employ mitigation and where necessary provide a strategy for implementation. It must also incorporate a strategic, catchment-scale view of water resource management by identifying how development of the allocation may positively contribute towards protecting and the improving water environment in line with the Thames River Basin Management Plan (RBMP)³⁰³ and Thames Catchment Management Plans <small>New web linked Footnote - https://www.gov.uk/government/collections/catchment-flood-management-plans</small></p>	
PMM 41	Appendix 4 ('Natural environment' theme of Allocation 06: Land South east of Down Ampney, page 176)	<p>Revise the natural environment theme for Publication MLP Allocation 06:</p> <p>A comprehensive assessment of the natural environment will be required. This should include those natural assets present in, which rely upon, and / or that are located within the sphere of influence of the allocation. The assessment must identify potential impacts and scrutinise their significance taking into account the different activities / stages of minerals development ((e.g. the preparation of land prior to mineral working, mineral working and processing and subsequent restoration incorporating aftercare). Environmental designations in the locality that will need careful consideration include: - North Meadow and Clattinger Farm SAC; North Meadow SSSI / NNR; and Down Ampney Pits KLWS. In the event that The re-notification of the Cotswold Water Park SSSI is re-notified for its breeding and overwintering bird assemblages, an assessment should also be assessed carried out to establish whether adverse effects from proposed mineral developments may occur including the disturbance of the important bird assemblages. In addition, any priority habitats and / or priority species, which encompass or have been recorded in, which rely upon, and / or that are located within the sphere of influence of the allocation must be investigated. A further crucial aspect of the assessment will be the provision of sufficient details concerning measures deemed necessary to avoid, reduce, remedy and / or compensate possible unacceptable negative effects. Any scheme of mitigation must also be accompanied by a clear strategy for implementation and be able to demonstrate its deliverability. In totality, the assessment of natural resources must demonstrate how any issues which arise, have been considered in a holistic manner and within a strategic context. In particular it must be clear as to how local ecological networks the nearby: - Ampney Corridor; Eysey; Cleveland Lakes; and Roundhouse Farm Strategic Nature Areas (SNAs) as expressed upon the Gloucestershire Nature Map will not be subject to unacceptable adverse impacts. Where opportunities exist to deliver tangible benefits, due consideration should be given to possible collaborations and coordination with the programme of nature conservation actions identified for the Cotswold Water Park Nature Improvement Area (NIA).</p>	<p>In response to representation: 808023/29/AL06/SND</p> <p>The representation questioned the reference made in the Detailed Development Requirements to the re-notification of the Cotswold Water Park SSSI, which has not yet been completed. In response, the modification clarifies the current status of the Cotswold Water Park SSSI and the unresolved nature of the re-notification exercise.</p> <p>In addition, the change of name of 'Key Wildlife Sites' to 'Local Wildlife Sites' as decided by the Gloucestershire Local Nature Partnership in January 2019 has been reflected along with the evolution of the Gloucestershire Nature Map and constituent Strategic Nature Areas (SNAs), which are evolving into the Gloucestershire ecological (and Nature Recovery) network. This is in line with the national approach proposed in Defra's 25 Year Plan: – www.gloucestershirenature.org.uk/nature-map and www.gloucestershirenature.org.uk/nature-recovery-network</p>
PMM 42	Appendix 4 ('Historic	Revise the historic environment theme for Publication MLP Allocation 06:	In response to representation:

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
	environment – including archaeology' theme of Allocation 06: Land South east of Down Ampney, page 177)	<p>A Heritage Statement (HS) is required to establish the presence of heritage assets that could be affected and to assess the nature, extent and importance of their significance and their settings. The HS must also provide a detailed analysis of potential impacts and their envisaged significance associated with all activities related to the working of the allocation. Where the potential for adverse impacts is identified, details of the means of avoiding such impacts or delivering sufficient mitigation to eradicate and / or reduce their significance to an acceptable degree must be included. <u>This could include limitations on operations including the working of minerals.</u> The prime focus should be on the preservation of key heritage assets. A proportionately detailed, reasoned justification will be necessary in every instance that harm to, or the potential loss of a heritage asset is envisaged. Information regarding how recording and / or the excavation of heritage assets may also be necessary. The HS must be comprehensive in its coverage by considering both designated and undesignated heritage assets including those of potential archaeological interest. Information contained on the Gloucestershire Historic Environment Record (G-HER) should be interrogated along with the National Heritage List (NHL) produced by English Heritage. The settlement at Bean Hay Copse Scheduled Monument (NH list entry: 1003446) and several grade II listed buildings at Castle Hill Farm (NH list entries: 1341032 and 1304915) are located near to the boundary of the allocation and will likely require some degree of analysis. There are also numerous records of prehistoric and Roman activity in the locality, which will likely require further investigation. In addition, 20th century military activity within the allocation is very evident and should also be carefully assessed³⁰⁴.</p>	<p>793641/6/AL06/COM</p> <p>The representation advised that the Detailed Development Requirements for the allocation should note the potential for limitations to occur as a consequence of the risk to nearby heritage assets. The modification responds accordingly to the advice.</p>
PMM 43	Appendix 4 ('Aerodrome safeguarding' theme of Allocation 06: Land South east of Down Ampney, page 178)	<p>Revise the aerodrome safeguarding theme for Publication MLP Allocation 06:</p> <p>A Bird Hazard Management Scheme (BHMS) will be required. Advice with respect to its scope and content should be sought at the earliest possible opportunity from Defence Infrastructure Organisation (DIO) Safeguarding. The BHMS should establish the nature, scale and significance of any potential bird hazards associated with all mineral-related activities that support the working of the allocation. Particular attention will need to be given to the functioning of nearby RAF Fairford due to the location of the allocation within <u>the statutory safeguarding aerodrome height, technical and birdstrike safeguarding consultation zones</u> and an area where Instrumental Landing Systems (ILS) may need to operate. Although, other nearby aerodromes could also require investigation and may need to be taken into account. <u>Consultation with the DIO will be required if any equipment is proposed that exceeds 15.2 metres in height above ground level.</u> Details of the deliverable measures and securable commitments to manage and reduce the frequency and severity of any possible bird hazard risks <u>to an acceptable level and that the effective monitoring of their success over time, including</u></p>	<p>In response to representation: 801951/7/AL06/USND</p> <p>The representation raised concern about the potential unsuitability of mineral working within close proximity to RAF Fairford. Particular attention was paid to the risk to aircraft safety from any restoration involving the formation of new water bodies. In response, the modification clarifies the existence of various safeguarding zones; the circumstances surrounding formal consultation with the relevant responsible safeguarding body; and the nature and scope of any future assessment to manage</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		post- mineral working, restoration and aftercare, should will likely form a major element of the BHMS.	risk that may potentially arise.
PMM 44	Appendix 4 ('Restoration opportunities and constraints' theme of Allocation 06: Land South east of Down Ampney, page 178)	<p>Revise the restoration opportunities and constraints theme for Publication MLP Allocation 06:</p> <p>A restoration strategy will be required. Where necessary, individual proposals must give due consideration to their contribution to the delivery of a coherent and combined solution encompassing the entire allocation. Progressive restoration techniques should be applied unless it is demonstrated and justified to be of greater benefit and / or less harmful to apply alternative arrangements. In developing the overall restoration strategy, evidence must be presented to show how integration can be achieved with the existing local environment. Particular attention must be given to continued aviation safeguarding and the avoidance of any increased risk of bird strike at nearby RAF Fairford and / or other nearby aerodromes. This may significantly restrict opportunities to achieve wet restoration, particularly involving the introduction of new open water bodies.</p> <p>Where the public rights of way network has been affected by development of the allocation, attention will need to be given to the integration of acceptable long term resolutions such as the reinstatement or permanent re-routing of affected paths. Opportunities to contribute to the ambitions of the nearby Ewyas and Ampney Corridor Strategic Nature Areas (SNAs) and the nature conservation actions for the Cotswold Water Park Nature Improvement Area (NIA) should be taken. Consideration should also be given to the possibility of facilitating other beneficial land uses and / or positively contributing to the future management of land as identified in locally applicable plans and strategies such as the Cotswold District Local Plan and the Cotswold Water Park Master Plan. This could, under the right circumstances, include facilitating new infrastructure that will contribute towards the long-term restoration and possible expansion ambitions of the Thames and Severn Canal network³⁰⁵. Furthermore, all proposed restoration solutions must be mindful of climate change and the need to deliver a greater degree of environmental resilience to its envisaged impacts. Under certain conditions this could involve the careful integration of measures to facilitate desirable habitat shifts to take place, which may act as suitable refuges for displaced and / or vulnerable species. An outline aftercare management plan covering at least the 1st five-year post-mineral working period should be incorporated into the overall restoration strategy. This must set out the commitments for carrying out aftercare and for undertaking a more detailed programme up to 12 months prior to the commencement of restoration. It must also contain the direction for future management of any restored areas. A longer timeframe of aftercare may be necessary where nature conservation and informal recreation after-uses are likely to dominate.</p>	<p>In response to representation: 801951/7/AL06/USND</p> <p>The representation raised concern about the potential unsuitability of mineral working within close proximity to RAF Fairford. Particular attention was paid to the risk to aircraft safety from any restoration involving the formation of new water bodies. The modification confirms the likelihood that limitations will need to be put in place for mineral restoration (i.e. restricting opportunities for open water bodies) over the allocation.</p>
PMM 45	Appendix 4 ('Water	Revise the water resources theme for Publication MLP Allocation 07:	In response to representation:

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
	resources' theme of Allocation 07: Land at Lady Lamb Farm, west of Fairford, page 182)	<p>A hydrological / hydrogeological impact assessment in accordance with EA guidance will be required. The superficial deposits of the allocation host a Secondary 'A' shallow aquifer for which little information is known as to its properties. Consequently, a detailed analysis of the existing local groundwater regime will be essential. The assessment must also afford attention to identifying and quantifying groundwater risks associated with all possible minerals-related development activities (e.g. working, processing, site restoration including aftercare) and establish a stringent monitoring regime commencing at least 12-months prior to the commencement of the development, continuing throughout the operational phase and including site restoration and aftercare. The allocation also lies within a Source Protection Zone 1 (SPZ1). This will require a very specific risk assessment to be carried out to consider potential pollution of potable water supplies and other sensitive commercial water supplies. Beyond the allocation, possible hydrological impacts on nearby surface water bodies (up to 3km) will require scrutiny. These include: Marston Meysey Brook; Dudgrove Brook; River Coln; a network of drains and tributaries to the River Coln; and several ponds and lakes some of which can be traced back to previous mineral workings in the locality. Although a more definitive sphere of hydrological influences will need to be established through a Water Features Survey. This could identify other and / or more distant surface water bodies that are also worth assessing along with other relevant receptors. The HIA must scrutinise the need to employ mitigation and where necessary provide a strategy for implementation. It must also incorporate a strategic, catchment-scale view of water resource management by identifying how development of the allocation may positively contribute towards protecting and the improving water environment in line with the Thames River Basin Management Plan (RBMP)³¹⁰ and Thames Catchment Management Plans <small>New web linked Footnote - https://www.gov.uk/government/collections/catchment-flood-management-plans</small></p>	<p>1169920/12/AL07/COM</p> <p>The representation advised on improvements to the detailed development requirements for the allocation to take account of Water Framework Directive (WFD) matters. The modification responds accordingly to the advice.</p> <p>A Statement of Common Ground has also been prepared and co-signed with the respondent in respect of the modification.</p>
PMM 46	Appendix 4 ('Aerodrome safeguarding' theme of Allocation 07: Land at Lady Lamb Farm, west of Fairford, page 183)	<p>Revise the aerodrome safeguarding theme for Publication MLP Allocation 07:</p> <p>A Bird Hazard Management Scheme (BHMS) will be required. Advice with respect to its scope and content should ideally be sought at the earliest possible opportunity from Defence Infrastructure Organisation (DIO) Safeguarding. The BHMS should establish the nature, scale and significance of any potential bird hazards associated with all mineral-related activities that support the working of the allocation. Particular attention will need to be given to the functioning of nearby RAF Fairford due to the location of the allocation within <u>the statutory safeguarding aerodrome height, technical and birdstrike safeguarding consultation zones</u> and an area where Instrumental Landing Systems (ILS) may need to operate. <u>Consultation with the DIO will be required if any equipment is proposed that exceeds 15.2 metres in height above ground level.</u> Although, other nearby aerodromes could require investigation and may need to be</p>	<p>In response to representation: 801951/8/AL07/USND</p> <p>The representation raised concern about the potential unsuitability of mineral working within close proximity to RAF Fairford. Particular attention was paid to the risk to aircraft safety from any restoration involving the formation of new water bodies. In response, the modification clarifies the existence of various safeguarding zones; the circumstances surrounding formal</p>

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC	Reasons for the Proposed Main Modifications
		<p>taken into account. Details of the deliverable measures and securable commitments to manage and reduce the frequency and severity of any possible bird hazard risks <u>to an acceptable level</u> and the <u>that</u> effective monitoring of their success over time, <u>including post- mineral working, restoration and aftercare, should</u> will likely form a major element of the BHMS.</p>	<p>consultation with the relevant responsible safeguarding body; and the nature and scope of any future assessment to manage risk that may potentially arise</p>
PMM 47	Appendix 4 ('Restoration opportunities and constraints' theme of Allocation 07: Land at Lady Lamb Farm, west of Fairford, page 184)	<p>Revise the restoration opportunities and constraints theme for Publication MLP Allocation 07:</p> <p>A restoration strategy will be required. Where necessary, individual proposals must give due consideration to their contribution to the delivery of a coherent and combined solution encompassing the entire allocation. Progressive restoration techniques should be applied unless it can be demonstrated and justified to be of greater benefit and / or less harmful to apply alternative arrangements. In developing the overall restoration strategy, evidence must be presented to show how compatibility and wherever possible, integration can be achieved with the existing local environment. Particular attention must be given to continued aviation safeguarding and the avoidance of increased risk of bird strike at nearby RAF Fairford. <u>and / or other nearby aerodromes. This may significantly restrict opportunities to achieve wet restoration, particularly involving the introduction of new open water bodies.</u> Where the public rights of way network has been affected by development of the allocation, attention will need to be given to the integration of acceptable long term resolutions such as the reinstatement or permanent re-routing of affected paths. Opportunities to contribute to the ambitions of the nearby Bibury and Coln Corridor Strategic Nature Areas (SNAs) and the nature conservation actions for the Cotswold Water Park Nature Improvement Area (NIA) should be taken. Consideration should also be given to the possibility of facilitating other beneficial land uses and / or positively contributing to the future management of land as identified in locally applicable plans and strategies such as the Fairford Neighbourhood Plan, Cotswold District Local Plan and the Cotswold Water Park Master Plan. Furthermore, all proposed restoration solutions must be mindful of climate change and the need to deliver a greater degree of environmental resilience to its envisaged impacts. Under certain conditions this could involve the careful integration of measures to facilitate desirable habitat shifts to take place, which may act as suitable refuges for displaced and / or vulnerable species. An outline aftercare management plan covering at least the 1st five-year post-mineral working period should be incorporated into the overall restoration strategy. This must set out the commitments for the carrying out aftercare and for undertaking a more detailed programme up to 12 months prior to the commencement of restoration. It must also contain the direction for future management of any restored areas. A longer timeframe of aftercare may be necessary where nature conservation and informal recreation after-uses are likely to dominate.</p>	<p>In response to representation: 801951/8/AL07/USND</p> <p>The representation raised concern about the potential unsuitability of mineral working within close proximity to RAF Fairford. Particular attention was paid to the risk to aircraft safety from any restoration involving the formation of new water bodies. The modification confirms the likelihood that limitations will need to be put in place for mineral restoration (i.e. restricting opportunities for open water bodies) over the allocation.</p>

Schedule of Proposed Main Modifications prepared by Gloucestershire County Council | April 2019

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC			Reasons for the Proposed Main Modifications																																																																																
PMM 48	New Appendix 5, after page 184	<p>Insert a new appendix into the Publication MLP that contains a schedule of the existing 'saved' policies that would be replaced: -</p> <table border="1"> <thead> <tr> <th>Policy</th><th>Title</th><th>Status (i.e saved or not saved under transitional arrangements)</th><th>Proposed Action</th></tr> </thead> <tbody> <tr> <td>E1</td><td>International and European Sites of Nature Conservation</td><td>Not Saved</td><td>Replaced by Policy DM06 Biodiversity and Geodiversity</td></tr> <tr> <td>E2</td><td>Areas of Outstanding Natural Beauty</td><td>Saved</td><td>Replaced by Policy DM09 Landscape</td></tr> <tr> <td>E3</td><td>Nationally Important Sites of Nature Conservation</td><td>Not Saved</td><td>Replaced by Policy DM06 Biodiversity and Geodiversity</td></tr> <tr> <td>E4</td><td>Nationally Important Archaeological Sites (including Scheduled Ancient Monuments)</td><td>Saved</td><td>Replaced by Policy DM08 Historic Environment</td></tr> <tr> <td>E5</td><td>Listed Buildings and Conservation Areas</td><td>Not Saved</td><td>Replaced by Policy DM08 Historic Environment</td></tr> <tr> <td>E6</td><td>Other Nationally Important Sites of Historic Interest</td><td>Saved</td><td>Replaced by Policy DM08 Historic Environment</td></tr> <tr> <td>E7</td><td>Best and Most Versatile Agricultural Land</td><td>Not Saved</td><td>Replaced by Policy DM07 Soil Resources</td></tr> <tr> <td>E8</td><td>Regionally and Locally Important Designated Sites</td><td>Saved</td><td>Replaced by Policy DM06 Biodiversity and Geodiversity</td></tr> <tr> <td>E9</td><td>Green Belt</td><td>Saved</td><td>Replaced by Policy DM10 Gloucester-Cheltenham Green Belt</td></tr> <tr> <td>E10</td><td>National, Regional and Local Biodiversity</td><td>Saved</td><td>Replaced by Policy DM06 Biodiversity and Geodiversity</td></tr> <tr> <td>E11</td><td>Protection of the Water Environment</td><td>Saved</td><td>Replaced by Policy DM05 Water resources</td></tr> <tr> <td>E12</td><td>Flood Risk/Flood Plain Development</td><td>Not Saved</td><td>Replaced by Policy DM04 Flood risk</td></tr> <tr> <td>E13</td><td>Riparian Buffer Zones</td><td>Saved</td><td>Replaced by a combination of Policy DM04 Flood risk and Policy DM05 Water resources</td></tr> <tr> <td>E14</td><td>Protecting the Local Environment – County-Wide</td><td>Saved</td><td>Replaced by DM01 Amenity, DM02 Cumulative impact and DM09 Landscape</td></tr> <tr> <td>E15</td><td>Protecting the Local Environment – Cotswolds Water Park</td><td>Saved</td><td>Replaced by DM01 Amenity, DM02 Cumulative impact, and DM09 Landscape</td></tr> <tr> <td>E16</td><td>Economic Development</td><td>Saved</td><td>Replaced by DM01 Amenity and DM02 Cumulative impact</td></tr> <tr> <td>E17</td><td>Safeguarding Public Access</td><td>Saved</td><td>Replaced by DM03 Transport</td></tr> <tr> <td>E18</td><td>Opportunities for Improved Access</td><td>Saved</td><td>Replaced by DM03 Transport</td></tr> <tr> <td>E19</td><td>Transport</td><td>Saved</td><td>Replaced by DM03 Transport</td></tr> </tbody> </table>			Policy	Title	Status (i.e saved or not saved under transitional arrangements)	Proposed Action	E1	International and European Sites of Nature Conservation	Not Saved	Replaced by Policy DM06 Biodiversity and Geodiversity	E2	Areas of Outstanding Natural Beauty	Saved	Replaced by Policy DM09 Landscape	E3	Nationally Important Sites of Nature Conservation	Not Saved	Replaced by Policy DM06 Biodiversity and Geodiversity	E4	Nationally Important Archaeological Sites (including Scheduled Ancient Monuments)	Saved	Replaced by Policy DM08 Historic Environment	E5	Listed Buildings and Conservation Areas	Not Saved	Replaced by Policy DM08 Historic Environment	E6	Other Nationally Important Sites of Historic Interest	Saved	Replaced by Policy DM08 Historic Environment	E7	Best and Most Versatile Agricultural Land	Not Saved	Replaced by Policy DM07 Soil Resources	E8	Regionally and Locally Important Designated Sites	Saved	Replaced by Policy DM06 Biodiversity and Geodiversity	E9	Green Belt	Saved	Replaced by Policy DM10 Gloucester-Cheltenham Green Belt	E10	National, Regional and Local Biodiversity	Saved	Replaced by Policy DM06 Biodiversity and Geodiversity	E11	Protection of the Water Environment	Saved	Replaced by Policy DM05 Water resources	E12	Flood Risk/Flood Plain Development	Not Saved	Replaced by Policy DM04 Flood risk	E13	Riparian Buffer Zones	Saved	Replaced by a combination of Policy DM04 Flood risk and Policy DM05 Water resources	E14	Protecting the Local Environment – County-Wide	Saved	Replaced by DM01 Amenity, DM02 Cumulative impact and DM09 Landscape	E15	Protecting the Local Environment – Cotswolds Water Park	Saved	Replaced by DM01 Amenity, DM02 Cumulative impact, and DM09 Landscape	E16	Economic Development	Saved	Replaced by DM01 Amenity and DM02 Cumulative impact	E17	Safeguarding Public Access	Saved	Replaced by DM03 Transport	E18	Opportunities for Improved Access	Saved	Replaced by DM03 Transport	E19	Transport	Saved	Replaced by DM03 Transport	To ensure that the MLP meets the requirements of Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ¹
Policy	Title	Status (i.e saved or not saved under transitional arrangements)	Proposed Action																																																																																		
E1	International and European Sites of Nature Conservation	Not Saved	Replaced by Policy DM06 Biodiversity and Geodiversity																																																																																		
E2	Areas of Outstanding Natural Beauty	Saved	Replaced by Policy DM09 Landscape																																																																																		
E3	Nationally Important Sites of Nature Conservation	Not Saved	Replaced by Policy DM06 Biodiversity and Geodiversity																																																																																		
E4	Nationally Important Archaeological Sites (including Scheduled Ancient Monuments)	Saved	Replaced by Policy DM08 Historic Environment																																																																																		
E5	Listed Buildings and Conservation Areas	Not Saved	Replaced by Policy DM08 Historic Environment																																																																																		
E6	Other Nationally Important Sites of Historic Interest	Saved	Replaced by Policy DM08 Historic Environment																																																																																		
E7	Best and Most Versatile Agricultural Land	Not Saved	Replaced by Policy DM07 Soil Resources																																																																																		
E8	Regionally and Locally Important Designated Sites	Saved	Replaced by Policy DM06 Biodiversity and Geodiversity																																																																																		
E9	Green Belt	Saved	Replaced by Policy DM10 Gloucester-Cheltenham Green Belt																																																																																		
E10	National, Regional and Local Biodiversity	Saved	Replaced by Policy DM06 Biodiversity and Geodiversity																																																																																		
E11	Protection of the Water Environment	Saved	Replaced by Policy DM05 Water resources																																																																																		
E12	Flood Risk/Flood Plain Development	Not Saved	Replaced by Policy DM04 Flood risk																																																																																		
E13	Riparian Buffer Zones	Saved	Replaced by a combination of Policy DM04 Flood risk and Policy DM05 Water resources																																																																																		
E14	Protecting the Local Environment – County-Wide	Saved	Replaced by DM01 Amenity, DM02 Cumulative impact and DM09 Landscape																																																																																		
E15	Protecting the Local Environment – Cotswolds Water Park	Saved	Replaced by DM01 Amenity, DM02 Cumulative impact, and DM09 Landscape																																																																																		
E16	Economic Development	Saved	Replaced by DM01 Amenity and DM02 Cumulative impact																																																																																		
E17	Safeguarding Public Access	Saved	Replaced by DM03 Transport																																																																																		
E18	Opportunities for Improved Access	Saved	Replaced by DM03 Transport																																																																																		
E19	Transport	Saved	Replaced by DM03 Transport																																																																																		

¹ Regulation 8(5) of Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) states; "Where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy".

Schedule of Proposed Main Modifications prepared by Gloucestershire County Council | April 2019

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC			Reasons for the Proposed Main Modifications
		E20	Highways	Saved	Replaced by DM03 Transport
		E21	Safeguarding Railhead and Wharves	Not Saved	Replaced by MS02 Safeguarding mineral infrastructure
		A1	County Contribution to the local apportionment of the Regional Guidelines	Saved	Replaced by MW01 Aggregate provision
		A2	Landbanks	Saved	Replaced by MW01 Aggregate provision
		A3	Future Aggregates Mineral Development within Preferred Areas	Saved	Replaced by MA01 Aggregate working within allocations and MW01 Aggregate provision
		A4	Future Aggregates Mineral Development outside Preferred Areas	Saved	Replaced by MA02 Aggregate working outside of allocations and MW01 Aggregate provision
		A5	Areas of Future Crushed Rock Aggregates Mineral Development – Forest of Dean	Saved	Replaced by MA01 Aggregate working within allocations and MW01 Aggregate provision
		A6	Areas of Future Crushed Rock Aggregates Mineral Development – Cotswold	Saved	Replaced by MA01 Aggregate working within allocations and MW01 Aggregate provision
		A7	Areas of Future Sand and Gravel Aggregates minerals Development – Upper Thames Valley	Saved	Replaced by MA01 Aggregate working within allocations and MW01 Aggregate provision
		NE1	Supply of Building Stone	Saved	Replaced by Policy MW02 Natural building stone
		NE2	Clay	Saved	Replaced by Policy MW03 Clay for civil engineering purposes and Policy MW04 Brick clay
		EM1	Opencast Coal Extraction	Saved	Replaced by Policy MW05 Coal
		EM2	Small Scale Underground Mining	Saved	Replaced by Policy MW05 Coal
		EM3	Colliery Spoil	Saved	Replaced by Policy MW05 Coal
		EM4	Existing Colliery Spoil Tips	Saved	Replaced by Policy MW05 Coal
		EM5	Reworking Colliery Spoil Tips	Saved	Replaced by Policy MW05 Coal
		EM6	Oil and Gas	Not Saved	The policy has not been replaced and as it was not saved, does not remain in force. Please refer to paragraphs 55-64 of the new MLP for an explanation.
		EX1	Mineral Exploration	Not Saved	The policy has not been replaced and as it was not saved, does not remain in force. Please refer to paragraphs 55-64 of the new MLP for an explanation.
		SE1	Processing Secondary Materials	Not Saved	Replaced by SR01 Maximising the use of secondary and recycled aggregates, MS02 Safeguarding mineral infrastructure and MW06 Ancillary minerals development
		SE2	Minerals Waste Minimisation	Not Saved	Replaced by MR01 Restoration, aftercare and facilitating beneficial after-uses and MA02 Aggregate working outside of allocations

Schedule of Proposed Main Modifications prepared by Gloucestershire County Council | April 2019

PMM Reference	Origin of PMM within MLP (location and page no.)	Proposed Main Modifications (PMMs) brought forward by GCC				Reasons for the Proposed Main Modifications
		SE3	Safeguarding Mineral Resources	Not Saved	Replaced by MS01 Non-mineral developments within MSAs and MS02 Safeguarding mineral infrastructure	
		SE4	Prior Extraction of Mineral Resources	Not Saved	Replaced by MS01 Non-mineral developments within MSAs	
		R1	Beneficial Reclamation of Worked-Out Mineral Sites	Saved	Replaced by MR01 Restoration, aftercare and facilitating beneficial after-uses	
		R2	After-use	Saved	Replaced by MR01 Restoration, aftercare and facilitating beneficial after-uses	
		R3	Progressive Restoration	Saved	Replaced by MR01 Restoration, aftercare and facilitating beneficial after-uses	
		R4	Enhancing Worked-Out Mineral Sites	Saved	Replaced by MR01 Restoration, aftercare and facilitating beneficial after-uses	
		DC1	Mitigation of Environmental Effects	Saved	Replaced by DM01 Amenity, DM02 Cumulative impact, DM03 Transport, DM05 Water resources, DM06 Biodiversity and Geodiversity and DM07 Soil Resources	
		DC2	Ancillary Development	Saved	Replaced by MW06 Ancillary minerals development	
		DC3	Importation of Material	Saved	Replaced by MR01 Restoration, aftercare and facilitating beneficial after-uses	
		DC4	Safeguarding Aerodromes	Saved	Replaced by Policy DM11 Aerodrome safeguarding and aviation safety	
		DC5	Planning Obligations	Saved	This policy has been superseded by the CIL Regulations. As such it no longer remains in force and has not been replaced.	
		DC6	Planning Obligations – Eastern Spine Road	Saved	This policy has been superseded by the CIL Regulations. As such it no longer remains in force and has not been replaced.	
		DC7	Borrow Pits	Saved	Replaced by policies MA02 Aggregate working outside of allocations, MW01 Aggregate provision, MW02 Natural building stone, MW03 Clay for civil engineering purposes, Policy MW04 Brick clay and MW05 Coal	