



Gloucestershire
COUNTY COUNCIL

Minerals Local Plan for Gloucestershire

2018 – 2032

Statement of Common Ground

**Gloucestershire County Council (GCC)
and
The Environment Agency (EA)**

December 2018

Introduction

This Statement of Common Ground (hereafter referred to as “SoCG”) has been prepared by Gloucestershire County Council (hereafter referred to as “GCC”) in response to the representations received from the Environment Agency (hereafter referred to as “EA”) in respect of certain matters within the Publication (Proposed Submission) version of the Minerals Local Plan for Gloucestershire (2018 – 2032) (hereafter referred to as “the MLP”).

Following the cessation of public consultation for the MLP under Regulation 19, officers of GCC and EA have exchanged further correspondence on a number of plan-making matters listed below:-

- Policy MA01 (page 67);
- Policy DM04 (page 91);
- supporting text to Policy DM04 (pages 91 - 95);
- Policy DM05 (page 97);
- supporting text to Policy DM05 (pages 96 to 99);
- Appendix 4: Allocation 01 (pages 145 to 150);
- Appendix 4: Allocation 06 (pages 173 to 178); and
- Appendix 4: Allocations 02, 03, 04, 05, 07 (pages 151 to 167 and 179 to 184)

Table 1 summarises the representations made by the EA at the publication consultation stage in respect of the matters listed above, the consideration given to these representations by GCC and the agreements that have now been reached on common ground. All agreements also include suggested modifications to the Publication (Proposed Submission) MLP, which GCC will seek to present for future consideration at examination. Where necessary and appropriate, the suggested modifications will be incorporated into a formal request under section 20(7c) of the Planning and Compulsory Purchase Act.

This document should be read in conjunction with the Submission MLP (2018-2032) Copies of Representations made in accordance with Regulations 20 and the Addendum to the Supporting Evidence Paper.

Table 1 | Details of common ground between GCC and EA in respect of the matters contained in the MLP

Publication MLP representation reference	Publication MLP reference	Summary of EA comments and GCC's response focused on how the plan could be made legally compliant and sound	Suggested modifications to the Publication MLP for consideration at examination Strikethrough represents text to be removed <u>Underlined</u> represents new text to be included
1169920/1/MA01/USND	Policy MA01	<p>The EA considered that Publication MLP Policy MA01 was unsound on three counts – not justified, not effective; and not consistent with national policy. The removal of Allocation 01: Land east of Stowe Hill Quarry was suggested as a potential resolution.</p> <p>In response GCC have reviewed the evidence provided by the EA to support the proposed change and agree that Allocation 01: Land east of Stowe Hill Quarry should be omitted from the plan entirely. This change along with the consequential revision to the numbering of the remaining allocations in the plan will be formally presented as suggested modifications for future consideration at the plan's examination.</p>	<p>Policy MA01 Aggregate working within allocations</p> <p>The principle of mineral working for aggregates has been accepted within the following allocations: -</p> <ul style="list-style-type: none"> Allocation 01: Land east of Stowe Hill Quarry; Allocation 02¹: Land west of Drybrook Quarry; Allocation 03²: Depth extension to Stowfield Quarry; Allocation 04³: Land northwest of Daglingworth Quarry; Allocation 05⁴: Land south and west of Naunton Quarry; Allocation 06⁵: Land southeast of Down Ampney; Allocation 07⁶: Land at Lady Lamb Farm, west of Fairford. <p>Mineral development proposals for the working of aggregates within allocations will be permitted, subject to satisfying the detailed development requirements set out in the plan for each allocation (see appendix 4) and where it can be demonstrated: -</p> <p>I. existing permitted reserves are inadequate, or are likely to be so in the near future to maintain minimum landbank levels in accordance with policy MW01; or</p> <p>II. where minimum landbank levels are being sustained: -</p>

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			<ul style="list-style-type: none"> • 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; or • increases in demand for aggregate are forecast with a reasonable degree of certainty to the extent that minimum landbank levels will not be able to be maintained throughout or at the end of the plan period.
1169920/2/DM04/USND	Policy DM04	<p>The EA considered that Publication MLP Policy DM04 was unsound on three counts – not justified, not effective; and not consistent with national policy. A number of text additions and replacements were suggested alongside the removal of parts of the policy.</p> <p>In response GCC acknowledge the advice of the EA and consider it to be reasonable and beneficial to bring forward a number of changes incorporating those proposed by the EA.</p> <p>An agreement has been reached between GCC and EA on detailed changes to Publication MLP Policy DM04. The changes will be formally presented as suggested modifications for future consideration at the plan's examination.</p>	<p>Policy DM04 Flood Risk</p> <p>Mineral development proposals will be permitted, where it can be demonstrated: -</p> <ol style="list-style-type: none"> they will be resilient to the impacts of flooding; there will be no increase in the risk of flooding on site and elsewhere from all sources of flooding now and in the future; there will be no increase in the risk of flooding from all sources now and in the future; and wherever possible, flood risk reduction initiatives will be incorporated that will achieve a reduction in the risk of flooding overall; wherever possible, flood risk betterment initiatives will be delivered. 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);

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			<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), 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 may be appropriate within 'Flood Risk Zone 3b' or any identified</p>

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			<p>'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), or equipment is designed to remain operational, safe for users, and flood resilient during a flood event. <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>

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			<p>I. — they are classified as ‘water compatible’; and</p> <p>II. — there will be no net loss of floodplain storage, no impediment to water flows, and no increase in flood risk elsewhere; or</p> <p>III. — wider sustainability benefits to the community exist that outweighs the risk of flooding as determined through an exception test.</p> <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 <u>in areas of flood risk and where they exceed 1ha</u> must be accompanied by a Flood Risk Assessment (FRA) that <u>will show</u> 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 <u>the following</u>: -</p> <ul style="list-style-type: none"> • <u>all</u> current and future sources of flooding, appropriately taking into account the <u>anticipated</u> 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.

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1169920/3/DM04/USND	Supporting text to Policy DM04 (pages 91 to 95 paragraphs 314 to 327)	<p>The EA considered that the supporting text to Publication MLP Policy DM04 was unsound on three counts – not justified, not effective; and not consistent with national policy. Additional text to signpost sources of evidence on climate change and flooding matters was suggested.</p> <p>In response GCC acknowledge the advice of the EA and consider it to be reasonable and beneficial to bring forward the changes proposed by the EA.</p> <p>An agreement has been reached between GCC and EA on detailed changes to the supporting text to Publication MLP Policy DM04. The changes will be formally presented as suggested modifications for future consideration at the plan's examination.</p>	<p>321. Surface Water Management Plans (SWMPs) have been prepared for parts of Gloucestershire. These provide enhanced flood-related information including the risk of surface water flooding. The Environment Agency has also prepared <u>the Flood Map for Planning</u> and updated the Flood Map for Surface Water (uFMfSW) and several strategic-scale Catchment Flood Management Plans (CFMPs), which cover Gloucestershire and bordering local authority</p> <p>322. 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. <u>Climate Change Allowances have been published by the Government and theses 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.</u> All elements of minerals development <u>must form part of the assessment of flood risk</u> adhere to these requirements, including all built structures, the working of minerals themselves and also the carrying out of restoration and aftercare.</p>
1169920/4/DM05/USND	Policy DM05	<p>The EA considered that Publication MLP Policy DM05 was unsound on three counts – not justified, not effective; and not consistent with national policy. A number of policy changes and additions were put forward.</p> <p>In response GCC acknowledge the advice of the EA and consider it be reasonable and beneficial</p>	<p>Policy DM05 Water resources</p> <p>Mineral development proposals will be permitted where it can be demonstrated: -</p> <p><u>there will be no deterioration decline in water quality that would lead to a deterioration of EU Water</u></p>

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		<p>to make changes to the policy incorporating those proposed by the EA.</p> <p>An agreement has been reached between GCC and EA on detailed additions and revisions to Publication MLP Policy DM05 to be formally presented as suggested modifications for consideration at examination.</p>	<p><u>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;</u></p> <p>I. they will not prejudice the quantity of water contained within water bodies; <u>measures will be incorporated to enhance and protect water quality, including Gloucestershire's groundwater resources;</u></p> <p>II. 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 <u>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;</u></p> <p>III. <u>the physical integrity of watercourses will be preserved and wherever possible conserved and 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>IV. <u>wherever possible, measures to achieve the efficient use of water will be delivered including incorporating appropriate water conservation techniques.</u></p>

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1169920/5/DM05/USND	Supporting text to Policy DM05 (pages 96 to 99 paragraphs 328 to 329	<p>The EA considered that the supporting text to Publication MLP Policy DM05 was unsound on three counts – not justified, not effective; and not consistent with national policy. A number of changes and additions to the supporting text were put forward.</p> <p>In response GCC acknowledge the advice of the EA and consider it reasonable and beneficial to bring forward a number of changes to the supporting text incorporating those proposed by the EA.</p> <p>An agreement has been reached between GCC and EA on detailed additions and revisions to the supporting text to Publication MLP Policy DM05 to be formally presented as suggested modifications for consideration at examination.</p>	<p>332. Mineral developments have the potential to impact on the management of water resources. Mineral working and / or the removal and storage of overburden and soils, and de-watering operations could influence groundwater recharge and depletion rates as well as the dynamic of surface water flows. Significant volumes of water may be required in the washing of minerals and other processing activities. The use of industrial machinery and vehicles could also heighten water pollution risks affecting both surface and groundwater resources.</p> <p>333. The Water Framework Directive (WFD) sets the overarching policy for protecting and improving the water quality and ecological health of all water bodies – rivers, lakes, canals, estuaries and coastal and ground waters throughout the UK. It requires there to be at least no deterioration in the status of all water bodies and presently sets a target to achieve at least 'Good Status' for all by 2015 <u>2027</u>.</p> <p>335. Mineral development proposals may benefit from should be supported by a hydrological and hydrogeological assessment that <u>incorporates an analysis of water quality and quantity impacts. The assessment must be carried out where it is anticipated water quality impacts pose a significant planning concern. In certain circumstances a specific WFD Compliance Assessment may also be necessary. 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.. provides an analysis of risk to water resources and how any</u></p>

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			<p>possible adverse impacts will be avoided or mitigated. In line with planning practice guidance, the assessment <u>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.</u> should identify the water bodies that represent potential planning concern – those directly affected through proposed modifications or as a consequence of indirect activities. <u>Key aspects of the assessment should include</u> The assessment must also consider 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. The overarching objective must be to demonstrate at least, how the current WFD status of identified water bodies will not suffer any deterioration.</p> <p>336. In preparing a hydrological and hydrogeological assessment <u>The assessment of water quality and quantity impacts will need to pay particular attention to</u> should be paid, where relevant to the Severn River and / or Thames River Basin Management Plans. 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 guidance. 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, there is or to secure no deterioration in the quality of water</u></p>

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			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>ambitions improvements</u> outlined within the relevant River Basin Management Plan.
1169920/6/AL01/USND	Appendix 4 Detailed Development Requirements for Allocation 01: Land east of Stowe Hill Quarry	<p>The EA considered that the Detailed Development Requirements for Allocation 01: Land east of Stowe Hill Quarry as set out in appendix 4 of the Publication MLP were unsound on three counts – not justified, not effective, and not consistent with national policy. As advised under Publication MLP Policy MA01, the removal of the allocation from the plan was suggested as the only possible resolution.</p> <p>In response GCC have reviewed the evidence provided by the EA to support the proposed change and agree that Allocation 01: Land east of Stowe Hill Quarry should now be omitted from the plan entirely. This change along with the consequential revision to the numbering of allocations in appendix 4 will be formally presented as a suggested modification for future consideration at the plan's examination.</p>	<p>Removal of the reference to Allocation 01 on the introductory page for Appendix 4 (page 144) and also the omission of pages 145 to 150 which present in full the Detailed Development Requirements for Allocation 01: Land east of Stowe Hill Quarry.</p>

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1169920/11/AL06/USND	Appendix 4 Detailed Development Requirements for Allocation 06: Land southeast of Down Ampney	<p>The EA considered that the Detailed Development Requirements for Allocation 06: Land southwest of Down Ampney as set out in appendix 4 of the Publication MLP are unsound on two counts – not justified and not effective. Additional text was suggested in respect of Water Framework Directive (WFD) and Source Protection Zone (SPZ) matters.</p> <p>In response GCC acknowledge the advice of the EA and consider it reasonable and beneficial to bring forward the changes put forward.</p> <p>An agreement has been reached between GCC and EA on detailed changes to the Detailed Development Requirements for Allocation 06: Land southwest of Down Ampney. The changes will be formally presented as suggested modifications for future consideration at the plan's examination.</p>	<p>Theme Water Resources: -</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. Advise 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;</p>

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			<p>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 / in combination 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 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) <u>and Upper Thames Catchment Management Plan.</u></p>

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1169920/7/AL02/COM; 1169920/8/AL03/COM; 1169920/9/AL04/COM; 1169920/10/AL05/COM; 1169920/12/AL07/COM	Appendix 4 Detailed Development Requirements for Allocations 02, 03, 04, 05 and 07.	<p>The EA considered that the Detailed Development Requirements for Allocations 02 (Land west of Drybrook Quarry); 03 (Depth extension to Stowfield Quarry); 04 (Land northwest of Daglingworth Quarry); 05 (Land south and west of Naunton Quarry); and 07 (Land at Lady Lamb Farm, west of Fairford). would benefit from additional text in respect of Water Framework Directive (WFD) matters.</p> <p>An agreement has been reached between GCC and EA to bring forward changes to Allocations 02, 03, 04, 05 and 07.. The changes will be formally presented as suggested modifications for future consideration at the plan's examination.</p>	<p>Allocation 02: Land west of Drybrook Quarry;</p> <p>Theme Water Resources</p> <p>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) <u>and the Wye and Severn Vale Catchment Management Plans</u></p> <p>Allocation 03 Depth extension to Stowfield Quarry;</p> <p>Theme Water Resources</p> <p>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 Plan (RBMP) <u>and the Wye and Severn Vale Catchment Management Plans</u></p> <p>Allocation 04: Land northwest of Daglingworth Quarry;</p> <p>Theme Water Resources</p> <p>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 Plan (RBMP) <u>and the</u></p>

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			<p><u>Thames Catchment Management Plans</u></p> <p>Allocation 05: Land south and west of Naunton Quarry; and Theme Water Resources</p> <p>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 Plan (RBMP) <u>and the Thames Catchment Management Plans</u></p> <p>Allocation 07: Land at Lady Lamb Farm, west of Fairford Theme Water Resources</p> <p>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) <u>and Upper Thames Catchment Management Plan</u></p>

Signed on behalf of the Environment Agency: -

Signed on behalf of Gloucestershire County Council:-

Mark Davies, Planning Specialist, Sustainable Places – West Midlands Area
Date: 19th November 2018

Simon Excell, Lead Commissioner: Strategic Infrastructure
Date: 6th December 2018