

1. This response to the Inspector's document "Matters, Issues and Questions", received 2<sup>nd</sup> April 2019 is submitted on behalf of Hills Quarry Products Ltd and supports the submission made by Land & Mineral Management on 6<sup>th</sup> July 2018.
2. A review of the Inspector's Matters Issues and Questions indicates that many of the points raised in that submission response last year have been noted by the Inspector and therefore, in light of his comments about not needing repetition of the issues, the simple bullet point list where we think change should be discussed was agreed with the program officer as a suitable approach.

#### **Main Matters 4 Issues around safeguarding Mineral Resources, Points 22-26**

3. There isn't so much a need to balance as a need to ensure mineral sterilisation does not occur as it cannot be reversed.
4. "Agent of Change" should be reflected.

#### **Main Matter 5 Adequate provision for the steady and adequate supply of aggregate minerals Points 27-34**

5. Revised wording has been put forward by Gloucestershire on 1<sup>st</sup> May, critical issues are around acceptance of landbanks over 7 year, recognition that there will always be fluctuations in demand, time between assessment of need and release into the market could be years, projects such as dualling sections of A419 and acceptance that demands for mineral does not follow county boundaries but supplies the nearest markets or further afield for specialist products.

#### **Main Matter 7 – Development Management Points 39 – 62**

6. The polices and much of the supporting wording is overly prescriptive and not reflective to a variety or scale of applications. If sufficiently large and in a sensitive location all matters will be addressed by EIA looking at harm to the environment, amenity and therefore human health. If small and not in a sensitive location then matters will be as necessary to consider if the land use is appropriate.
7. A raft of changes published recently by Gloucestershire seeks to change much of this wording but many of the issues have not been resolved simply tinkered with.

#### **Main Matter 8 – Monitoring and Implementation – Point 65**

8. Need to consider the impact of adjoining county's landbanks being significantly depleted and not being replaced on the implications for future supply

#### **Main Matter 9 – Appendices**

9. Given that none of these sites will be consented without a full EIA, extensive pre-application discussion including Scoping of the EIA with various consultee inputs etc what is the purpose of such prescriptive development requirements?
10. Recent publication of new proposed updates by Gloucestershire still doesn't reflect the EA's agreed position of not requiring twin tracking of Permit for Allocation 06.