

# TEMPLE GUITING PARISH COUNCIL

## Further response to Naunton Quarry planning application 18/0065/CWMAJM

These comments supplement those previously submitted by TGPC on 3/11/2018 and relate to the recent amendments to the application.

### 1. Landscape

We welcome the amendments to the proposed landscaping scheme and measures to mitigate the over production of aggregate outlined in the non technical summary dated September 2018.

However, there is no evidence of the need to leave exposed rock faces in a landscape that generally does not include such features where there is also no obvious benefit to the environment or the local community. Reinstating the natural terrain would enable the use of more 'waste' materials, reducing the number of vehicle movements needed to remove 'waste'. Current technology, such as laser scanning and digital photography, would provide adequate information for future reference, although no obvious demand for this is evidenced.

### 2. Impact on the Local Environment

The revised proposal, as submitted, raises two significant areas of concern.

#### 2.1 Industrialisation

Paragraph 23 of the submission states that works should be at an "appropriate scale" in order to "provide building materials that help maintain and enhance the local distinctiveness of the AONB" However, Para 4.14 contradicts this statement and reveals that works will not be at that 'appropriate' scale, as less than 0.5% of the proposed production of 500,000 tonnes p.a. would be Cotswold stone building materials.

The adjacent quarry, Grange Hill, submitted a revised application (18/0074/CWMAJM) recently in which its primary justification for its extension is the importance of the local grey and cream stone, which provides architectural masonry for maintenance of the heritage of buildings in and around the Cotswolds. Naunton quarry will be extracting from the same strata of stone as Grange Hill, yet Naunton quarry does not discuss how it will deal with this valuable stone. There is also no mention of how reserves of this type of stone will be preserved for use over time, or whether there is a need for both quarries to work the same stone at the same time.

Not only is the extraction at an industrial scale, but the activities at Naunton Quarry include industrial cement and concrete production. Yet the application's response to Policy EN1 of the Cotswold District Plan, which emphasizes the Cotswold heritage, rests on the production of Cotswold building stone materials. Similarly, sections 3.13 to 3.35 of the application's Environmental Statement, refers to the Cotswold AONB Management Plan 2018-2023, which is a material consideration. Paragraph 172 of the plan says "the applicant would need to demonstrate that exceptional circumstances apply and that the development would be in the public interest. Limestone and other minerals ... extracted in the AONB should primarily be used for purposes that conserve and enhance the natural beauty and special qualities of the AONB. The amount (or proportion) of the limestone that would be used for these purposes within the AONB should be evidenced."

This application does not fulfill that condition, yet it justifies the application on the basis of its contribution to the Cotswold's unique qualities through its quarrying of Cotswold building stone, when it is only 0.5% of its output.

#### 2.2 Tranquility

Paragraph 3.24 of the Cotswold AONB Management Plan 2018 – 2023 "provides that proposals should have regard to the tranquility of the Cotswolds by seeking to (i) avoid and (ii) minimise noise pollution and other aural and visual disturbance; and that measures should be taken to enhance the tranquility of the Cotswold AONB by (i) removing and (ii) reducing existing sources of noise pollution and other aural and visual

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*disturbance.*” However, the application lacks any evidence to show how this proposed development would address these specific points. Paragraph 4.7 of the application states that “no significant adverse effects have been raised by the Environment Statement. This is corroborated by the consultation process where no objection has been received on any noise, dust and air quality, landscape or transport ground.” This is in complete disregard to the comments and complaints submitted by this and neighbouring Parishes including:

- \* Noise of the quarry operations regularly heard in Kineton and the Cotswold Farm Park and noise/vibration/inconsiderate driving of HGVs.
- \* Local residents’ expressions of concern about the number, speed and aggressive driving of HGVs on the narrow roads of Buckle Street and the B4077. TGPC has received complaints from Summerhill residents, Lavender Hill residents, the Cotswold Farm Park, Kineton residents and others.
- \* Residents of Ford and the Cotswold Farm Park have again gain expressed their concerns regarding loss of amenity and, in the case of the Farm Park, of the impact on their business. The Farm Park employs 100 people and is a major driver of the tourist industry in the area –a very significant source of income and employment in the North Cotswolds.

This raises serious questions about the adequacy and robustness of the environmental impact statement already submitted, and the willingness of the applicant to address local concerns.

The noise of Naunton’s quarrying operations can be heard along the Upper Windrush valley and at the Cotswold Farm Park. In addition, the noise of the pecker was specifically identified as the dominant source of noise in the Grange Hill application. The revised proposals for Naunton do not address this issue. Given that the application states that quarrying would be extended from 2026 by another 16 years to 2042, the application should address mitigation of current noise levels and working practices should be reviewed regularly as technology develops improved solutions.

Temple Guiting Parish Council receives regular complaints that Buckle Street is frequently very dirty as a result of mud from quarry lorry wheels. Current and past planning permissions have included a requirement for wheel washing both for quarrying and for concrete batching (Environment Statement Feb 2018). The key aspect is that the “wheels and chassis (must) have been cleaned to prevent material being deposited on the highway.” Yet the wheel wash is appx 115 metres into the site (as per Environment statement Feb 2018). Vehicles then cross the weighbridge and leave via Buckle Street. The current arrangements do not achieve the objective set as a condition of planning permission as the distance between the wheel wash and the exit provides significant opportunities for further dirt to accumulate on vehicles’ wheels. Moving the wheel wash to adjacent to the site exit , and checking each vehicle leaving the site, would deliver the requirement to ‘prevent material being deposited on the highway’.

### **2.3 Cumulative impact, particularly of HGV movements and amenity value**

Paragraph 4.19 states that *“To satisfy the specific requirements of the emerging policy as assessment of the possible existence of cumulative impacts generated from within Naunton Quarry and from the variety of mineral and non-mineral developments in the surrounding area will be necessary.”*

The scale of operation proposed in this application, which extends quarrying beyond 2026 to 2035, will dominate the impact of the quarrying sector on local communities in this part of the AONB. In this context the cumulative impact on access routes and operations from other quarries should be taken into account (including Tinkers Barn; Grange Hill, Oathill, Cotswold Hill, Three Gates and Guiting quarries).

TGPC is aware of the significant increase in quarry traffic on local roads, for example, the number of HGVs passing through Ford on the B4077 has doubled in the past 5-7 years if the figures included in recent planning applications are correct. Par 4.20 of the Environmental Statement claims *“referencing the submitted Environmental Statement, it is demonstrated (and confirmed by consultation) that there are no*

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*cumulative impacts derived from the proposed southern extension*". However, no additional data has been submitted with the revised proposal which specifies the overall number of vehicles entering and exiting Naunton quarry, the routes taken or any analysis of the impact of those movements either in isolation or as part of a study of their cumulative impacts.

From a review of recent applications and Highways data it is clear that the overall impact of quarry traffic in this area has not been fully assessed. For example, no additional data has been presented regarding:

- the cumulative number of HGV movements (including both export and fill materials)
- the cumulative impact of HGVs on the transport routes around the quarries, including Buckle Street, Ford and Stanway Hill, in terms of noise, vibration, dust and pollution.

As far as TGPC is aware, there is no strategy to mitigate those impacts. This will require cooperation and openness from all of the operators in the area and illustrates that applications should not be reviewed in isolation.

The transport statement says that *'Daily movements are clearly accommodated by the existing infrastructure'*. It is true that the roads are still there and that traffic continues to flow. However, the roads in poor condition – the surfaces are damaged and the verges are being worn away, removing any amenity value they had in the past. Road users are having to 'accommodate' lorries by being driven off the road into verges and pot holes, subjected to tailgating and pressured by speeding quarry vehicles. Cyclists are under even more intense pressure when confronted with quarry vehicles.

Working on the basis of 500,000 tonnes of material carried in vehicles permitted to carry 20 tonnes, Naunton quarry confirms (Section 2.20, Environmental Statement) that it alone is contributing an average of 18.2 vehicle movements per hour. This does not take into account the fact that individual vehicles do not leave the quarry at regular intervals so this figure will be higher at certain times. The figure also does not include Naunton's permission to import 24,375 tonnes which (Section 2.22 Environmental Statement), adding a further 12 movements per day. The total number of HGV movements generated by Naunton quarry alone is close to 20 movements per hour.

This is not the total number of quarry vehicles using the roads, especially Buckle Street. The roads are also carrying HGVs from other local quarries including Oathill, Guiting, Tinker's Barn, Grange Hill, 3 Gates and Cotswold Hill quarries. The cumulative tonnage of materials extracted and imported in the North Cotswold Cluster are likely to be as high as 850,000 tonnes p.a. – equivalent to 85,000 HGV movements p.a. (assuming each load is 20 tonnes and generates an empty backload). Using Naunton's factors of a 257-day year and an 11 hour day, quarrying in the cluster generates at least 330 movements per day or 30 per hour. Each movement generates around 85Db, which clearly has an impact on anything close to the vehicles.

The vast majority of this traffic carries aggregate and other materials which are not *'primarily ... used for purposes that conserve and enhance the natural beauty and special qualities of the AONB'* (as per paragraph 172 of the Cotswold AONB Management Plan).

TGPC is not aware of any strategy to mitigate these impacts, either cumulatively across all quarries in the cluster, or for individual quarries.

Until there is a holistic understanding of cumulative HGV movements across the area together with the impacts on the environment (including noise and pollution), and clear plans to mitigate adverse impacts, applications for increases in production or for long term future developments cannot be properly assessed and should not be permitted.

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### 3. MLP

Naunton quarry is a 'preferred site' in the emerging Gloucestershire Minerals Local Plan. The plan states that the local aggregates assessment (which is based on sales) for Gloucestershire provides a 10 year average crushed rock figure requirement of 480,000 tonnes per annum. The other preferred site in Gloucestershire, Daglingworth in the Forest of Dean, produces 0.25 million tonnes p.a.. This leaves a further requirement for 230,000 tonnes p.a. Naunton quarry already far exceeds this amount. If quarrying were limited to the amount required to fulfil GCC's plans, the life of the current extent of the quarry would be extended and HGV movements would be significantly reduced.

### 4. Summary

Given that Naunton is the dominant contributor to the overall impact on local communities in this area, TGPC requests that the full proposal should be refused pending a detailed assessment and after mitigations have been developed for all the issues outlined above:

- \* industrialisation of an AONB
- \* absence of 'primary' use to produce Cotswold stone building materials
- \* lack of planning for treatment of seam of high value building stone
- \* large number of HGVs producing significant amounts of noise pollution
- \* many examples of poor driving standards by HGV drivers
- \* dust pollution affecting local (equine and human) residents
- \* noisy quarrying with no plans to mitigate its effects
- \* lack of assessment of cumulative impact and lack of data on which to base that assessment
- \* production in excess of MLP requirements
- \* no justification for leaving exposed rock faces in reinstated areas.