



Nick Bainton
Gloucestershire County Council
Strategic Infrastructure
Shire Hall
Gloucester
GL1 2TH

By email only to: planningdc@gloucestershire.gov.uk

20 December 2021

Dear Nick,

APPLICATION NO: 21/0084/COMPLI

DESCRIPTION: Compliance with conditions 10(Biodiversity Mitigation Scheme) & 14(Restoration and Aftercare Management Scheme) relating to planning consent 18/00065/CWMAJM dated 21/10/2021

LOCATION: Naunton Quarry, Naunton, Gloucestershire, GL54 3BA

Thank you for consulting the Cotswolds Conservation Board ('the Board') on this proposed development, which is located within the Cotswolds National Landscape.¹

Having reviewed the information submitted by the applicant, the Board **objects** to the discharge of condition 14 pursuant to planning consent 18/0065/CWMAJM relating to the proposed Restoration and Aftercare Management Scheme, particularly the details submitted in relation to criteria iii) "*Selection of appropriate measures including establishment, enhancement and after-care*" and vi) "*List of types of sources of soil forming materials, plant stock and other species introductions, including details of planting and seeding mixes/densities/sizes and hedgerow spacings*". .

In reaching its planning decision, the minerals planning authority (MPA) has a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of the National Landscape.² The Board recommends that, in fulfilling this 'duty of regard', the MPA should: (i) ensure that planning decisions are consistent with relevant national and local planning policy and guidance; and (ii) take into account the following Board publications:

- Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 ([link](#)). The supporting text of the Gloucestershire Minerals Local Plan (GMLP) Policy MR01 specifically advises that the relevant aspirations of the Cotswolds AONB Management Plan should be considered in aftercare proposals;
- Cotswolds AONB Landscape Character Assessment ([link](#)) particularly, in this instance, with regards to Landscape Character Type (LCT) 7 (High Wold);
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)) particularly, in this instance, with regards to LCT 7 ([link](#)), including Section 7.5 and 7.17;
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#));
- Cotswolds Conservation Board Position Statements ([link](#)); and
- Cotswolds Nature Recovery Plan, adopted by the Board as guidance in October 2021 ([link](#)).

Cotswolds Conservation Board

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The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty (AONB), managed and looked after by the Cotswolds Conservation Board.

cotswoldsaonb.org.uk

Chairman:
Brendan McCarthy
Vice Chair:
Rebecca Charley

Objection to the proposed discharge of condition 14

The Gloucestershire Minerals Local Plan 2018-2032 (GMLP) Policy MR01 outlines how the working of minerals is a temporary land use and once mineral resources have been exhausted and / or the working of a site has permanently ceased it should be possible to re-use the land that has been affected or return it to its original use through a process of restoration. Accordingly, Policy MR01 requires that mineral development proposals demonstrate high quality restoration and aftercare which will, *inter alia*, be delivered to a high environmental standard and facilitate beneficial after-uses that will contribute to the delivery of sustainable development.

However, the Board considers that the proposals contained within the applicant's Proposed Restoration and Aftercare Management Scheme (dated June 2021) may create a pocket of landscape which is out of character with the surrounding area. The Board also considers that the applicant should amend their proposals to ensure that priority species (referred to below and expanded upon within the Cotswolds AONB Management Plan) should be a key component of the restoration plan, in line with Policy CE7 of the Management Plan.

Particular areas of concern include:

- Lack of transitional zones: The Restoration Plans (dwgs. DR-0001 S4-P1 and DR-0008 S4-P1) feature a number of hard edges between the different restoration areas which should be softened. For example, the hard woodland edge should be removed and replaced by a transition zone created from grassland into woodland. The restoration should incorporate a gradual transition from open grassland to parkland to wood pasture to woodland and hard edges need to be avoided. The Cotswolds Nature Recovery Plan describes these transitional environments, outlining how *"The high wold could contain large areas of new extensively grazed mosaic where there is considerable scope to explore combining trees and wildflower grassland in new "wood pastures" (page 15).*
- Extensive use of hedgerows rather than dry stone walls: Dry stone walls are the dominant field boundary rather than hedgerows and the Cotswolds AONB Landscape Strategy & Guidelines for LCT 7 (Section 7.17) identifies 'Loss of dry stone walls' and 'replacement with hedges or fences' as potential (adverse) implications for development such as this. Dry stone walls were removed when quarrying started on this site and should be replaced. In the limited areas where hedgerows have to be established, these should feature very few hedgerow trees to reflect the pattern of field boundary trees in the area and should not include blackthorn when located alongside grassland due to possible sheep entanglement issues.
- Woodland species selection: Silver birch should be removed as it is species alien to the Cotswolds and could seed prolifically into the grassland area. Small-leaved lime would be suitable replacement. There are also opportunities for the use of juniper (identified as 'highest priority' within the AONB Management Plan and Nature Recovery Plan) and native boxwood. Blackthorn should also be removed due to its propensity to creep and possible sheep entanglement.
- Grassland creation: The Cotswolds Nature Recovery Plan identifies that *"the restoration of quarries provides opportunities to create significant areas of high quality grassland, thin soil and scrub habitats" (page 53).* The Board considers that the main focus of the restoration scheme at Naunton should be on creating calcareous grassland habitat rather than creating scrub / thickets which are likely to arise over time anyway. Scrub habitat specifically created from the outset could over time potentially overgrow calcareous grassland. If scrub species are to be included in the restoration, this should be done within a grassland-to-woodland transition zone which would in turn provide a seed source and any thickets created should not include blackthorn or dog rose due to creep and possible sheep entanglement. If using Emorsgate, EM18 (St. Catherines mix for limestone collected in the southern Cotswolds)

would be more appropriate than EM6, though a preferable solution would be to source more local seed through the Glorious Cotswolds Grasslands project, run by the Board ([link](#)). Officers at the Board can provide the applicant with further information on this project if required.

- Further information is required on the source of any infill materials to be used in the restoration. Local materials that support native plant and wildlife should be used as in-fill materials.
- Arable aftercare from year 2 onwards: “*Cultivation to establish a seedbed*” should ensure that minimum or no-till is to be used if the soil is suitable.
- No consideration of Cotswold pennycress: This is a key area for this species identified as ‘highest priority’ in the Board’s AONB Management Plan and Nature Recovery Plan and it has been successfully introduced to new locations in the area.

Other comments

The supporting text of GMLP Policy MR01 states that restoration and aftercare regimes could “*include the establishment of new or reinforced measures to increase resilience and / or the ability to successfully adapt to climate change*” (paragraph 407). Similarly, Policy CC7 of the Cotswolds AONB Management Plan advocates that “*climate change mitigation should be a key consideration in all new development, infrastructure and transport provision*” and that “*small-scale forms of renewable energy that are compatible with the purpose of AONB designation*” should be encouraged.

The Board considers that this location is potentially suitable for a solar PV array, particularly on the former quarry slopes, which need not preclude any of the habitat creation activity outlined above and if carefully sited and managed, could avoid any adverse impacts on the natural beauty of the AONB. Therefore, the Board would strongly encourage the applicant to consider amending their proposals and use the restoration of the quarry as an opportunity to increase local renewable energy production.

If you have any queries regarding the information provided in this response, please do not hesitate to get in touch.

Yours sincerely,



Simon Joyce

Planning Officer

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NOTES:

- 1) Cotswolds National Landscape is the new name for the Cotswolds Areas of Outstanding Natural Beauty (AONB). The new name takes forward one of the proposals of the Government-commissioned 'Landscapes Review' to rename AONBs as 'National Landscapes'. This change reflects the national importance of AONBs and the fact that they are safeguarded, in the national interest, for nature, people, business and culture.
- 2) Section 85 of the Countryside and Rights of Way Act 2000.
www.legislation.gov.uk/ukpga/2000/37/section/85
- 3) The documents referred to in our response can be located on the Cotswolds National Landscape website under the following sections
 - a. Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023
www.cotswoldsaonb.org.uk/management-plan
 - b. Cotswolds AONB Landscape Character Assessment
www.cotswoldsaonb.org.uk/lca
 - c. Cotswolds AONB Landscape Strategy and Guidelines
www.cotswoldsaonb.org.uk/lsg
 - d. Cotswolds AONB Local Distinctiveness and Landscape Change
www.cotswoldsaonb.org.uk/ldlc
 - e. Cotswolds Conservation Board Position Statements
www.cotswoldsaonb.org.uk/ps1
www.cotswoldsaonb.org.uk/ps2