

**Oathill Quarry, Temple Guiting, GL54 5RR:
Application 19/0086/CWMAJM
Response to Reg 25 responses**

Temple Guiting Parish Council has reviewed documents added to this application since its initial comments in February 2020, including the Environmental Statement Addendum dated April 2020 and geological report dated October 2020; covering letters; comments from GCC Highways; Atkins' second response; comments from the Cotswold Conservation Board and the Officer Consultation Response from GCC's Strategic Infrastructure team.

Based on this information, TGPC cannot support and must object strongly to the proposed increase in production from Oathill. This is for several reasons, most importantly because the cumulative impact associated with this application, together with other recent applications from this cluster of quarries in the Cotswold AONB, has not been addressed to the standards required by current regulations.

This issue is further complicated by the threatening approach used in the covering letter from the operators of Oathill saying that, if the application is refused, they would increase HGV movements through Ford and would operate Oathill as a satellite to Guiting quarry (where the outdated permission is currently under review). While we appreciate that the process of trying to normalise historic overproduction from Oathill quarry may be frustrating, it needs to be seen in the context of local residents, visitors, businesses and the environment, all of which are subjected to the daily impact of a large number of HGV movements on the B4077 through Ford.

TGPC supports the recommendations made by consultants Atkins in their report; those in the Officer Consultation Report and the points raised in the June response from the Cotswold Conservation Board. However, little new evidence has been presented by the applicant since the original submission. The council is keen that GCC should pay great attention to these professional, informed comments.

The most significant points raised in the documents which TGPC has reviewed include:

- **HGV movements:** The number of HGVs using the B4077 is already high – described by Highways as 'a significant percentage' of everyday traffic, and confirmed in the data provided in the Oathill application which shows that there were approx. 420 HGV daily movements through Ford in August and September 2019. The figures are noted in the GCC Highways response which comments that *"based on the overall percentages of HGV locally there will, if other consents are granted latterly that increase HGV movements associated with this activity, be a cumulative impact that would be some degree adverse"*. GCC Highways also comments that the damage associated with the cumulative HGV movements will need to be addressed.
- **Lime Production:** CCB's response questions the need for the volume of lime proposed. Quarrying in the AONB is permitted for the maintenance of the characteristics of the AONB. Given the predominance of calcareous rock throughout the AONB, there is little local demand. Contrary to the submission by the applicant,

several alternative lime suppliers exist in the South West/Midlands to supply other parts of Gloucestershire.

A comparative environmental assessment which considers both the environmental impact of transport and the impacts of crushing at each of the production sites has not been presented.

- **Reinstatement:** The Atkins report recommends further evaluation and preparation of a quarry development plan which also addresses reinstatement. The need to export aggregate appears to be driven by the high percentage of waste product generated from the process of exposing and producing stone from the 'Guiting Gold' formation. The geological report also indicates that the aggregate will primarily be produced from the 285,000 tonnes of material which lie above the Guiting Gold reserves found on the east side of the quarry. No working plan seems to have been presented that considers the environmental benefits of using a greater proportion of these 'waste' materials for reinstatement. This would reduce the number of HGV movements as less material would be both exported and imported. As the western part of the quarry is already exhausted these materials could be used to reinstate that part of the site.

A quarry working plan which enabled phased reinstatement, as specified in permits for other local quarries, could result in earlier restoration and improved contouring, reducing the extent of exposed rock faces, making the area more in keeping with the local landscape.

- **Cumulative Impact:** Temple Guiting Parish Council is also extremely concerned about the contribution Oathill makes to the cumulative impact of the cluster of local quarries on residents, visitors, businesses and the environment.

The Environmental Statement Addendum refers to 'cumulative impact' but the method of assessing this is not consistent with the definition or guidance for Cumulative Impact assessment found in the MLP; NPPF 2012 / 2019; UK Government Guidance on Minerals; EU Environmental Directives or other internationally accepted definitions. At best the Environmental Statement merely refers to an incremental increase and has selectively presented the increase as 'nominal'. The statement should address all the factors associated with HGV movements - noise, dust, fumes and vibration - for past, current and projected increases.

The intention of cumulative impact assessments is to address the issues associated with multiple sites working in the same area, where each contributes to the localised impact and to the combined impact (or cumulative impact). This is precisely the situation in a sensitive site such as the village of Ford, where the combination of HGV movements from several quarries results in a significant cumulative impact. An assessment of the current impact is required from which an informed decision can then be made relating to the suitability of this application as well as other applications from within the cluster of quarries in this area. To dismiss this requirement, stating that the increase would only be marginal, misses the point of

the policy guidance and both national and international standards on cumulative impact. It also dismisses the distress of local residents.

To summarise, the applicant has failed to address the concerns raised in previously submitted comments and has chosen to dismiss them with the statement: -

“The lack of any specialist or substantiated objection on environmental, amenity, landscape or highways grounds, or in relation to planning policy from the MPA’s own advisors, planning application 19/0086/CWMAJM has demonstrated that the proposed development does not generate any unacceptable adverse impacts. It is therefore questioned how the MPA could sustain and substantiate locational or multi-mineral concerns to a degree to warrant refusal of the application”.

Temple Guiting Parish Council disagrees strongly with this statement. There is ample evidence of outstanding issues in the documents reviewed.

The proposed output, comments from Atkins and information from Touchstone, all show that the life of Oathill quarry as a provider of building stone is limited. The issue is not ‘should an aggregate/lime business exist in the AONB’, but the timing and way in which operations at Oathill should be drawn to a close. It is disappointing that alternative options combining enhanced reinstatement and production that reduce impacts on local roads and residents have not been presented and the application has sought to use intimidation and threats. It also casts a significant shadow over the application made for operations at Guiting Quarry, also operated by Johnson Quarry Group.

TGPC believes that decisions regarding increased production in the North Cotswold cluster should not be made until the issues highlighted in this response are addressed. This includes making a comprehensive assessment of cumulative impact on the area, particularly of the three applications from within this cluster of quarries which are currently under consideration.

Until then, any quarry planning decisions which would result in increased production should be deferred. This will give GCC the time to assess and manage cumulative impacts across this area. Co-operation across all parties involved would be fundamental to a successful and meaningful outcome.