**Minerals Plan: Document Review July 2018**

**Temple Guiting Parish Council’s response to Local Minerals Plan Consultation**

**General**

The Plan represents a significant amount of work over many years and the pulling the documentation together into a consolidated repository; this is welcomed.

**Application**

The Plan would benefit from a clarification statement on the status of the plan and it’s application to existing quarries; extension of existing sites and new applications.

Paragraph 6 states “ **will replace and update all aspects**” of the current plan and provides a clear **framework for how mineral developments should take place across Gloucestershire.**

Quarrying is a part of our landscape and plays a key part in providing materials for maintaining the character of our area and is a key source of employment. However we need to manage the level of activity and preserve the AONB.

**Impact on Parish of Temple Guiting**

The focus for future quarrying activities in this Plan is understandably based on Naunton (formerly Huntsman’s) Quarry. Given transport links and relatively remote location within area this is not unreasonable. As quarry expands there is a need to

* + - * monitor and control traffic movements
      * review noise levels and hours of working (we have early morning quarrying noise from before 6.30 with picks, heavy machinery and trucks reversing. As site expands need to review this.

However; little or no reference is made to the other quarries in our Parish:

* + - * Oathill (Recent permission to extend working and extraction rate)
      * Tinkers Barn
      * Cotswold Hills at Ford (Recent application to extend importation)
      * Three Gates at Ford

In 2017 a scoping application for a major new quarry at Norman’s Field at Temple Guiting 2017 was received by GCC.

There are also quarries in neighbouring Parishes of Guiting Power and Naunton that impact our Parish.

The Parish Council and local residents are fearful of further deterioration in local amenity from extensive quarrying in a small area within the AONB.

Given the impact of these on our environment this seems to be a significant omission, as is the fact that we have recently received three major applications for new quarries or extensions of existing quarries.

Given the new Minerals Plan how will other local quarrying activities be covered? Whilst the Plan states that “some aggregate working is allowable but is strictly controlled” at Oathill the recent failures to control the amount of aggregate and stone produced raises questions on the validity of this statement and the ability to “control” future works.

It is also of note that whilst the Plan makes reference to quarrying for building stone it is difficult to reconcile how this then fits with export of stone for gardens in other countries and the major concrete production facilities at Naunton Quarry. This use of quarries for exporting building stone outside of the AONB and major industrialisation of sites does not seem to be consistent with the stated objectives.

It is our view that a clearer statement in the Policy is needed regarding new applications and modification of existing permissions.

The comments provided by Mr Drake Strategic Infrastructure Minerals and Waste Policy to Councillor Nigel Moor dated 03 July 2018 would greatly assist the user of the policy of the wider intent and application.

The Plan wording para 172 “**A robust justification for allowing future natural building stone working in Gloucestershire must be shown”** should be emphasised.

We welcome the inclusion of wording in para 292 (DMO2) regarding cumulative impacts and the emphasis contained in DMO9 in this regard.

**Reinstatement and Management**

The Minerals Plan Section 11 makes reference to the importance of reinstatement of agricultural land and promoting biodiversity. Para 430 also states monitoring is a vital part of evidence-plan making.

However, we have been unable to find reference to any report or survey that looks at the effectiveness of reinstatement of quarries in our area or the combined impact of multiple quarrying sites within the same area of the AONB.

Mineral Plan Section 387 makes reference to the AONB and additional measures required to conserve the landscape and scenic beauty. This is welcomed. In this context what measures are proposed to clarify what constitutes quarrying activity and prevent a repeat of the situation currently seen in Guiting Power where there is a significant impact on the area? Clarification of what constitutes quarrying activity at the start of the document would be welcomed.

Clarification is needed on the intent of a degree of flexibility in may be shown when analysing individual proposals for small scale natural building stone workings stated in paragraph 174.

**Amenity**

We welcome the recognition in paragraph 268 which states “*local communities within Gloucestershire and those of neighbouring administrative areas will be avoided, strictly controlled or mitigated so as to ensure unacceptable impacts will not arise in respect of noise, vibration, air pollution and visual intrusion*”; likewise, Paragraph 278 which states “*The impact of each noise emission should be considered against the existing acoustic environment and its noise sensitivity. Suitable control, the use of mitigation measures and the monitoring of noise levels will need to be identified.*

However,paragraph 291 relating to privacy stating: *The siting of mineral developments in relation to neighbouring properties could result in the loss of privacy, usually through overlooking. Loss of privacy will normally be measured against the amount of private space afforded to residential properties likely to be adversely affected.*The effectiveness of the plan and wording is lost by the inclusion of the following wording of Paragraph 291. All sense of scale of impact is then lost by including statements on which parts of the house are included and should be deleted from the plan.

**Transport and road infrastructure**

Policy DM03 Transport makes some reference to the impact on local highway networks but doesn’t currently capture or highlight the intent referenced in Paragraph 301. Constant complaints of quarry dust and mud on local highways, combined with HGVs using narrow county lanes has led to extensive damage to verges and road surfaces.

Plans should also anticipate what happens when primary designated routes for HGVs are subjected to road closure notices.

**Cumulative Impact**

Minerals Plan Paragraph 292: The inclusion of comments on cumulative impact is welcomed. Clarification is needed on what baseline studies have been carried out and the basis for these and future studies.

From discussion with the Minerals Team, it is currently understood that no cumulative impact assessment has been carried out for multiple quarrying activities in our area of the Cotswold AONB. That that there is no legal requirement and, more important, there has been no funding to do this, though funds could potentially come from the mineral levy.

**Managing and Monitoring**:

The opening comment (paragraph 430) that “*Monitoring is a vital part of evidence-based plan making*” is welcomed but clearly requires consistency of staffing and funding to make this work. Recent unfortunate experiences have clearly demonstrated that whilst Plans are good they only work if they are fully supported and resourced. It is also of note that greater coordination is needed between all three tiers of local government and planning. This includes clarification of applications requiring extensive groundworks and what constitutes quarrying activities, as seen in neighbouring Parishes.