

**Oathill Quarry, Temple Guiting, GL54 5RR
Response to Application 21/0050/CWM73M
(Section 73 application)**

Temple Guiting Parish Council (TGPC) has reviewed documents for this application in the context of previous applications, other applications within the 'North Cotswold Cluster' of quarries and the relevant regulations and requirements.

TGPC visited Oathill Quarry on 20 October 2021 to review the status of current and proposed operations. Photographs from the site visit have been included in Annex A for reference.

TGPC has also compared the ground levels included in the plan of existing conditions (Drawing 2180-2 DR 001 dated 24 /06/2021) and those in the proposed restoration plan (Drawing 2180-2 DR 0007 dated 03/062021), with the current approved Restoration Plan Drawing 2190/C27/1 which was approved in 2015 (Ref 15/0099/COMPLI, relating to 14/0101/CWMAJM).

Based on this information TGPC cannot support, and must object strongly, to the proposed increase in production from Oathill until the issues listed below are resolved:

- 1. Failure to comply with GCC Minerals Local Plan policies and CCB requirements re: restoration, stone production, waste generation, and local need.**
- 2. Failure to properly assess and mitigate against environmental impacts on local residents, visitors and businesses.**
- 3. Failure to assess the contribution to cumulative impacts, of both existing quarrying activities and those that could reasonably have been foreseen as required by local, national and international guidance.**
- 4. Lack of information regarding the new processing shed.**

In addition, previous comments on 19/0086/CWMAJM by TGPC, CCB and CPRE among others, have not been addressed and still apply to this application.

Regardless of the outcome of this application, the data submitted highlights the need to understand and assess the current impacts which the cluster of quarries in the North Cotswolds have on local residents, particularly those who live on the principal access routes such as the B4077. The data provided with this application provides some insights which would enable the start this assessment.

Each of the above categories is expanded below.

1. Failure to comply with GCC Minerals Local Plan policies and CCB requirements re: restoration, stone production, waste generation, and local need.

- a. **Failure to provide a detailed restoration plan** as required by Policy MR01 and as provided by other quarries in the area. The current application states that a restoration plan will only be provided when permission is granted and that the plan will be an amended version of that included in previous application [19/0086/CWMAJM](#).

The current approved restoration plan for the site is Drawing 2180/C27/1, which was approved in 15/0099 COMPLI, relating to application 14/0101/CWMAJM. We have compared the approved restoration plan with the proposed plan included with this application and note the following:

- The site visit of 20 Oct 2021 confirmed that little progress has been made on reinstatement to date and the proposal seems to be to defer reinstatement until the end of the life of the quarry, rather than 'at the earliest opportunity' as required. Phased reinstatement was also recommended by the Atkins report for application 19/0086/CWMAJM.
- The site visit of 20 Oct 2021 noted a distinct lack of retention of materials for restoration and the proposal to export all materials reinforces this concern.
- The retention of straight line ,exposed stone cliff faces in the proposed reinstatement plan (Drg 7) are contrary to the local approved restoration scheme and to the CCB Characteristics, the Gloucestershire Landscape Character Assessment standards and GCC MLP Objective ENV. Open rolling hills are typical of the local area.
- The approved plan includes reinstatement of all exposed working faces to a slope of approx. 1:2. Planting schemes include mixed species woodland across the southern part of the quarry and limestone grassland over the remainder. The planting scheme for the north and east faces is unclear and is not coloured on the approved drawing (perhaps to be confirmed later). TGPC supports use of the current approved reinstatement plan and requests that, as part of finalising the details for the north and east slopes, slopes should be contoured to reflect the rolling landscape rather than giving an appearance of a straight line railway embankment or a stand at a football stadium.
- A restoration timeline of 1 year for a quarry is a bold and ambitious statement and needs further details, including details of the restoration and the number of HGV movements this could generate.

The proposed reinstatement plan lacks detail and would be a retrograde step compared with the current approved plan which aims to 'make a positive contribution towards improvements to environmental quality, biodiversity and/or health, well-being and quality of life of local communities' as specified in MR01. The current approved reinstatement plan should be retained and enhanced wherever possible to promote biodiversity and reflect the character of the area.

Policy MW02 states that "supplementary working .. for non-building stone purposes will not prejudice the ability to achieve future site restoration that accord(s) with policy MR01. Removing the entire amount of nearly 700,000 tonnes as planned in this

application, and not leaving any materials for restoration, is contrary to this policy as it prejudices the ability to restore the site. It is also contrary to driver E 'Reducing the impact of mineral transport'.

In addition, the GCC [Case Officer's response](#) to application 19/0086/CWMAJM cites four areas of concern. Three of these relate to the need to retain materials for restoration.

NPPF guidelines, which have been used in planning appeals, state 'applications .. should also be ensured that there are no unacceptable adverse impacts on the natural environment, with restoration and aftercare provided at the earliest opportunity and to the highest standard'.

The Government's own Planning Practice: Guidance on the planning for mineral extraction in plan making and the application process (Par: 036 Ref ID: 27-037-20140306) repeats the importance of the restoration process.

- b. **Failure to consider alternative working schemes** which would 'provide better environmental and transport solutions', as required by the Environmental Statement.

The sequence of operations (drawings 1-7) show work starting in the NE corner and finishing in the NW corner, with no scope for storage of materials for restoration. A schedule which started at the NW corner would leave it free for storage of 'waste' materials for future restoration, but neither this nor any other alternative has been considered. Alternative solutions are a requirement of the Environment Statement.

Materials will be needed to restore the site to a recognisable Cotswold landscape, as defined in the Gloucestershire Landscape Character Assessments and in the CCB equivalents.

Using native 'waste' materials produced in the process of revealing building stone would have a number of benefits. It would reduce the number of vehicle movements both inwards (when importing non-native materials for restoration) and outgoing (when removing materials). The use of on-site materials also ensures the site is suitable for native species. This would support Objective ENV of the MLP and provide the environment for initiatives supported by the CCB.

The stated restoration period of 1 year for a quarry which has been in intensive operation for over 25 years is not considered to be realistic unless the proposed restoration is superficial or generates a very large number of HGV movements.

Notwithstanding the points above and following the site visit on 20 October 2021, a comparison was made between the current site levels shown in Drg 1 and the proposed finished site levels shown in Drg 7. Our review found that the proposed finished quarry floor level is similar to that of the existing levels. (i.e. there is very little additional material to extract). We also noted that the approved reinstatement quarry floor level is much lower than has been proposed in this application.

It is not clear how the approved reinstatement scheme will be achieved unless the proposed floor is lower than that presented in Drg 7. This also raises significant questions about whether it is necessary to export any waste material from this site.

Materials for reinstatement should not need to be imported as the site produces largely 'waste' materials. Importation would have many negative impacts, including on the local road network and concerns about potential pollution of the local water sources.

c. Failure to comply with Cotswold AONB Management Plan Par 172.

The proposal does not comply with the requirements of this Plan, which specifies:

"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."

No 'exceptional circumstances' or public interests are identified in this application. The majority (70% +) of the output cannot be used for the conservation and enhancement of the AONB.

d. Failure to comply with MLP Policy MW02 regarding the criteria for quarrying natural building stone in Gloucestershire. This policy states that "...extensions to existing operations will need to be scrutinised to ensure they are justified. ... focused on the core purposes (of) policy MW02", which allows small scale working where the products 'contribute towards the maintenance of the historic built environment and will encourage local distinctiveness and good quality design'. However, the application is not 'small scale' and will only produce a small amount of stone, with the majority of the remaining products being agricultural lime.

This policy links to plan objective RM, which says 'where minerals are worked .. any waste generated is kept to a minimum'. In this case the amount of waste over the lifetime of the plan is 70% + of extracted materials, which dwarfs the amount of stone which may be produced.

Item 3.4 of the Supporting Statement says '(the) increased export limit would principally be apportioned to meet proven demand for agricultural lime'.

Since 2008 the proportion of building stone produced at Oathill has been falling and that of lime has been increasing. Application 08/0068/CWMAJM stated that the closure of Guiting Quarry had increased demand for lime. Guiting Quarry is now open. This application continues that trend, making the quarry primarily a site of lime production for other parts of the country, not stone, as shown in the following table of permitted/requested quarry outputs over time.

Year	% building stone produced /proposed
2008	62%
2014	40%
2031	30% (average over 10.5 yrs)

Table of permitted/proposed outputs from Oathill quarry

In addition, the application is for an increase of output from 50,000 to 100,000 tonnes p.a. with no restrictions on volumes per product, no restrictions on HGV movements and no mention of the volume of materials required to be imported for restoration.

The [CPRE comments](#) in a letter to Linda Townsend dated 27 January 2021 in relation to application 19/0086/CWMAJM add to concerns regarding quarries producing primarily aggregate or lime in the Cotswold AONB. The comments focus on, among other documents, Par 172 and Footnote 55 of the NPPF (Revised 2019) and Gloucestershire Minerals Local Plan Par 167.

- e. **Failing to demonstrate a need for agricultural lime and/or aggregate and/or building stone.** Comments on application [19/0086/CWMAJM](#), regarding the validity of an order from an agricultural lime distributor, including those from the case officer, the CCB and CPRE still apply. The GCC MLP does not include agricultural lime as a product which must be produced, presumably because limestone is present throughout most of the county. The case officer also stated in MWPR2020/0008/PAP that the applicant must prove that the mineral (i.e. ag lime) is of local importance. No proof has been offered other than an order from an ag lime distributor outside the local area, included with the previous application, which was dismissed by GCC. This letter does not demonstrate local need or local importance, but a potential sale. Given that this extension is intended to generate mostly agricultural lime (see Supporting Statement par 3.4) the need for this quarry product is not proved.

Policy MA02 states that 'aggregate working outside of allocations will only be allowed if ... the plan's allocations as set out in policy MA01 are not able to contribute towards/maintain minimum landbank levels in accordance with policy MW01'. The plan has identified sites for aggregate production. Oathill is not one of them.

The application contains no research to show the market for any of its products or the role of alternatives to these primary products (as encouraged in the MLP). This would include recycled materials and secondary aggregates, as specified in objective SR. For Cotswold stone building products, no information is given regarding reconstituted stone as an alternative product.

2. Failure to properly assess and mitigate against environmental impacts on local residents, visitors and businesses.

- a. **Failure to provide an Environmental Statement which meets GCC MLP Policy DC1 requirements.** The statement did not assess or offer mitigation against the impacts on the local communities and environment of local quarrying activities on this part of the AONB, including:
- Noise
 - Dust
 - Fumes and particulates
 - Loss of tranquillity from quarrying, processing and transporting products
 - Loss of amenity from the noise and dust produced directly and indirectly by quarrying activities
 - Vibration from passing HGVs
 - Damage to verges and surfaces due to HGVs using roads not designed for HGV traffic.
 - Impact on other road users including walkers, cyclists and those on horseback.

The traffic figures presented in the application show that approx. 400 HGV movements per day occur on the B4077 through Ford/Upper Coscombe. They also show a significant number of HGVs on Buckle Street (both to the north and south of Trafalgar Crossroads – the junction between the B4077 and Buckle Street). The HGV traffic counts for Buckle Street presented here are significantly higher than those presented in the Environmental Statement for Naunton Quarry, a discrepancy previously questioned by TGPC in its comments on the extension to Naunton quarry.

Local residents in Ford report HGV movements from as early as 5.30 a.m. on the B4077. Increasingly, HGV drivers from across the North Cotswold Cluster of quarries have been seen using unapproved routes from Buckle Street to the A424 on a regular basis. This point was also noted in comments from the GCC enforcement officer in 2021 on the potential need for designated access routes to and from the quarry.

The dust, fumes and vibration from passing HGVs are causing deep concern among local residents.

This application only considers the potential increases in environmental impacts attributable to this application. It suggests that vehicle movements will increase by 20 – 26 HGV two way movements per day (i.e. an increase of 40 - 52 more daily vehicle journeys). This represents an increase of approx. 10% on current journeys in and out of Oathill. However, the applicant seeks to justify the increased number of HGV movements per day as ‘marginal’. The impact of the current 400 HGV movements in terms of noise, particulates and vibration has not been assessed. In addition, seasonal trends for agricultural lime mean that HGV movements can double in summer. This means that the increase is likely to be 80 – 104 extra HGV movements in summer.

Photographs taken by local residents along the B4077 show clearly the effect that the large number of HGVs is having on the local environment. Buildings, cars and plants are all regularly covered in thick layers of dust which is renewed daily. No vibration survey has been carried out in Ford, although Tewkesbury Borough Council is thought to have carried one out at Upper Coscombe.

The acceptability of the existing environmental impacts of the cluster of quarries in the North Cotswolds has not been assessed. Any increase on an already unacceptable situation is also unacceptable and measures should be introduced to mitigate any adverse situations.

Each proposal should be assessed to establish what could be done to mitigate a potential increase, regardless of whether the baseline is acceptable or not.

Since the surveys cited in this application were carried out, planning policy documents and requirements which apply to Environmental Statements have changed. As a result, the assessment should be updated to reflect the new standards. The MLP 2018-2032 was adopted in March 2020; the NPPF (2012) was replaced in February 2019 and the Design Manual for Roads and Bridges was replaced in 2018, including modules LA 105 on air quality and LA 111 on Noise and Vibration.

b. Noise Assessment

The application refers to noise measurements that were conducted in Ford and two other locations between 16th and 26th August 2019. These are copied here for reference:

EIA Noise Chapter

Table 3.8: Monitoring Results – Average Monitored Noise Levels (Ford village – August 2019)

Date	Period	Range of Monitored Noise Levels					
		L _{Aeq}	L _{AE}	L _{AFmin}	L _{AFmax}	L _{A10}	L _{AF90}
16/08/19	Day 07.00 – 23.00*	40 - 72	65 - 96	31 - 54	55 - 94	41 - 76	33 - 57
	Night 23.00 – 07.00	26 - 62	51 - 87	20 - 36	37 - 80	29 - 68	22 - 40
17/08/19	Day 07.00 – 23.00	27 - 73	52 - 98	20 - 47	38 - 97	30 - 72	22 - 53
	Night 23.00 – 07.00	20 - 58	45 - 83	18 - 28	26 - 83	21 - 61	19 - 33
18/08/19	Day 07.00 – 23.00	38 - 75	63 - 100	27 - 46	51 - 99	40 - 71	29 - 51
	Night 23.00 – 07.00	25 - 67	50 - 92	21 - 37	34 - 83	27 - 72	23 - 43
19/08/19	Day 07.00 – 23.00	25 - 74	50 - 98	21 - 62	42 - 98	26 - 75	22 - 63
	Night 23.00 – 07.00	20 - 66	44 - 91	18 - 35	25 - 91	20 - 70	19 - 40
20/08/19	Day 07.00 – 23.00	23 - 75	48 - 100	19 - 45	35 - 98	24 - 71	21 - 48
	Night 23.00 – 07.00	19 - 66	44 - 90	18 - 33	24 - 84	19 - 69	18 - 39
21/08/19	Day 07.00 – 23.00	34 - 74	59 - 99	22 - 45	45 - 97	37 - 73	23 - 52
	Night 23.00 – 07.00	19 - 67	44 - 92	18 - 38	27 - 90	19 - 69	18 - 42
22/08/19	Day 07.00 – 23.00	35 - 63	60 - 88	29 - 49	40 - 87	37 - 66	30 - 51
	Night 23.00 – 07.00	20 - 60	45 - 85	18 - 36	25 - 80	22 - 61	19 - 38

*Based on Partial Data

Table 3.9: Monitoring Results – Average Monitored Noise Levels (Ford village – August 2019)

Date	Period	Typical Monitored Noise Levels					
		L _{Aeq}	L _{AE}	L _{AFmin}	L _{AFmax}	L _{A10}	L _{AF90}
16/08/19	Day 07.00 – 23.00*	65	90	45	81	70	49
	Night 23.00 – 07.00	53	78	31	71	55	33
17/08/19	Day 07.00 – 23.00	62	87	37	82	66	42
	Night 23.00 – 07.00	50	75	22	71	49	25
18/08/19	Day 07.00 – 23.00	63	88	38	82	66	43
	Night 23.00 – 07.00	55	80	28	73	58	32
19/08/19	Day 07.00 – 23.00	63	88	43	82	67	46
	Night 23.00 – 07.00	57	81	24	77	59	29
20/08/19	Day 07.00 – 23.00	61	86	36	82	64	40
	Night 23.00 – 07.00	55	80	22	73	57	27
21/08/19	Day 07.00 – 23.00	64	89	35	83	68	40
	Night 23.00 – 07.00	56	81	25	76	57	29
22/08/19	Day 07.00 – 23.00	56	81	44	75	58	47
	Night 23.00 – 07.00	46	71	28	66	46	30

*Based on Partial Data

The current Guidelines for Highways LA111 for noise refers to Lowest Observed Adverse Effect Levels (LOAEL) and Significant Observed Adverse Effect Levels (SOAEL)ⁱ for day and night times. These are presented in the table below:

3.49.1 LOAELs and SOAELs should be set out in accordance with Table 3.49.1 for all noise sensitive receptors:

Table 3.49.1 Operational noise LOAELs and SOAELs for all receptors

Time Period	LOAEL	SOAEL
Day (06:00-24:00)	55dB L _{A10,18hr} facade	68dB L _{A10,18hr} facade
Night (23:00-07:00)	40dB L _{night, outside} (free-field)	55dB L _{night, outside} (free-field)

3.50 LOAELs and SOAELs shall be modified where it is proportionate and merited by local circumstances which can include, but are not limited to:

- 1) noise sensitive receptors that have reduced sensitivity to noise or vibration e.g., sensitivity to noise is reduced if receptors have good noise insulation;
- 2) noise sensitive receptors that have an increased sensitivity to noise or vibration e.g., if a building is regularly used by people with hearing impairments, it is likely to be more sensitive to the users, as noise affects speech intelligibility at lower levels than it would for those with non-impaired hearing.

Comparing the data for the Ford survey LA₁₀ with the guidance in LA111 reveals that residents in Ford are subjected to noise levels from HGVs that exceed the current guidance levels. LA111 also states that lower acceptance levels may be appropriate for some receptors, including those with hearing impairments.

The table below shows the World Health Organisation information on the impact of night-time noise on humans, which would suggest that even lower limits should be considered. Given that Ford is in an area that is in an otherwise tranquil area (as designated by CPRE) disturbance by HGVs early in the morning (before 7.00 am) has a particular impact on local residents.

<ul style="list-style-type: none"> • Average night noise level over a year • $L_{night,outside}$ 	Health effects observed in the population
Up to 30 dB	Although individual sensitivities and circumstances may differ, it appears that up to this level no substantial biological effects are observed. $L_{night,outside}$ of 30 dB is equivalent to the no observed effect level (NOEL) for night noise.
30 to 40 dB	A number of effects on sleep are observed from this range: body movements, awakening, self-reported sleep disturbance, arousals. The intensity of the effect depends on the nature of the source and the number of events. Vulnerable groups (for example children, the chronically ill and the elderly) are more susceptible. However, even in the worst cases the effects seem modest. $L_{night,outside}$ of 40 dB is equivalent to the lowest observed adverse effect level (LOAEL) for night noise.
40 to 55 dB	Adverse health effects are observed among the exposed population. Many people have to adapt their lives to cope with the noise at night. Vulnerable groups are more severely affected.
Above 55 dB	The situation is considered increasingly dangerous for public health. Adverse health effects occur frequently, a sizeable proportion of the population is highly annoyed and sleep-disturbed. There is evidence that the risk of cardiovascular disease increases.

WHO table of the effects of night-time noise on humans

In summary, noise has not been adequately assessed in this application and it is understood that CDC requested further data on 8 October 2021. Current impacts are already considered to be unacceptable to local residents, as illustrated in the figures presented above. Any increase on an unacceptable situation is also unacceptable and measures should be introduced to mitigate any adverse situations.

c. Assessment of air quality

Measurements have not been carried out in Ford or along the B4077. Although levels of nitrogen dioxide and particulates have been measured at Stow on the Wold, no measurements have been taken in Ford, where the local topography will have an effect. The national Planning Practice Guidance (nPPG) for England states that: ‘Where dust emissions are likely to arise, mineral operators are expected to prepare a dust assessment study, which should be undertaken by a competent person/organisation with acknowledged experience of undertaking this type of work’.

d. Assessment of vibration

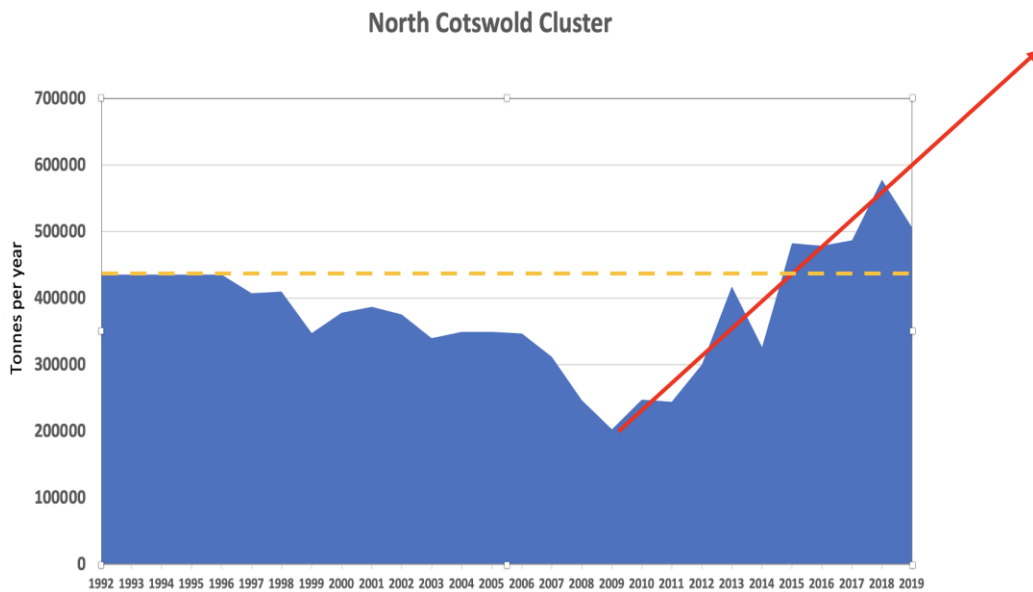
No measurements have been taken to assess the vibration created by HGV vehicles and its effects on properties in Ford, despite reference to the need to assess vibration in the MLP.

The National Planning Policy Framework (2019) states that in granting planning permission for mineral extraction, authorities should:

- ensure that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality;
- ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source, and establish appropriate noise limits for extraction in proximity to noise sensitive properties.

3. Failure to assess the contribution to cumulative impacts of both existing quarrying activities and those that could reasonable be foreseen, as required by local (MLP), national (NPPF) and EU regulations.

- a. The assessment of cumulative impact requires the examination of the impact of all recent and pending applications across the area. However the environmental data provided for traffic counts does not include local HGV movements associated with:
 - Guiting Quarry, where 300,000 tpa of exports are anticipated
 - Cotswold Hills Quarry, where unrestricted importation of reinstatement materials was granted after the date of the Oathill data
 - Tinkers Barn and Nayles Barn quarries, which have both increased their output by smaller amounts
 - Naunton Quarry, where approval of a large volume of exports is being finalised.
- b. The Environmental Statement provided is inconsistent with the definition or guidance for Cumulative Impact Assessment found in local (GCC MLP); national (NPPF 2012 and 2019); UK Government Guidance on Minerals; EU Environmental Directives or other internationally accepted definitions. Cumulative impact must be assessed in the context of current and historical production from the area. MPA figures for production from the cluster of quarries in the North Cotswolds show the area's production over the last 20 years. These have been combined with increases to date and the projected increases to give the following graph. It shows a significant increase over the last 10 years, with further increases including the reopening of Guiting Quarry projected on the graph.



Figures provided by GCC MPA July 2021. Note There are some gaps in the data provided. For missing years production is assumed to be the same as the previous year.

Graph of production levels in the North Cotswold Cluster of quarries

Covid has probably reduced export rates from the cluster in the last 18 months but data is not currently publicly available. As the building sector increases, export volumes are expected to rise. Historic figures provided by the GCC Minerals Planning Authority (above) provide a valuable reference and should be used to set the context for this application in conjunction with other applications in the area.

Contrary to the requirements of the Habitats Directive and UK legislation on Environmental Impact Assessments, the Environmental Statement fails to assess the projected increases in production at Oathill in conjunction with the activities (permitted, current and projected) across the cluster of quarries. The absence of a baseline impact assessment (noise, particulates and vibration) does not help.

The impacts of this application also need to be seen and assessed as part of the impact of the whole cluster of quarries in the North Cotswolds AONB and their impact on the particular qualities of the area including landscape, peace and tranquillity, and the importance this area has to the tourist industry.

GCC Highways supported this approach in its comments dated 20 February 2020 on application 19/0086/CWMAJM for Oathill (which also proposed an increase to 100,000 tpa), stating that “the HGV movements were factual” and that “In isolation the application has established that alone it falls under the threshold of 10% to be considered as a minor adverse impact. However, based on the overall percentages of HGVs 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 of adverse. They also stated that “...if consented the new movements would not be considered as the new baseline. The

baseline would remain as prior to the consent for any further applications that create such vehicle movements. “

Notwithstanding the cumulative impacts, the applicants own figures and traffic counts suggest that the increase in HGV movements will be approx. 10% but may well be higher depending on the time of year for proposed exports.

These and other comments from GCC Highways have not been addressed in the submission from the applicant or any other part of the GCC planning system.

TGPC supports the GCC Enforcement officer’s comment of 23 Sept 2021 relating to the need for controlled routes due to increased use of unsuitable roads in the area by some hauliers. A significant source of dust in the area is not from the quarries directly, but from the erosion of the road margins due to the number and size of HGVs using local roads.

4. Lack of information regarding the new processing shed

Proposed reinstatement Drg 7 shows new tree planting around the site of the proposed shed but, unlike the rest of the site, the area has been left uncoloured in the proposed restoration plan.

While regulations may not require a justification for the increase in size compared with the existing shed, the larger capacity invites questions as to whether the shed will be used to process products from other quarries in the area. This would generate inter-quarry movements, adding to the anticipated number of extra movements on this section of the B4077 and the clear negative impacts of this on residents, businesses and visitors.

In addition, lighting on any building in the AONB should be designed to help preserve dark skies in the area and not to disturb wildlife such as bats and owls at night.

Any permission should also require that the structures are removed and the site of the buildings should be fully restored within six months of cessation of stone exports. If however, the site as a whole was to be made an example of leading edge site restoration in the Cotswolds AONB, then plans could possibly include a visitor centre and carparking on the site of the building. This would meet MLP objectives of improving public access to the AONB.

Annex A

The following three photographs were taken, with permission, on 20 October 2021 at Oathill Quarry, Temple Guiting during a site visit. They show the current working faces and provide context for some of the comments made in this document.



North west corner of Oathill quarry 20th October 2021



Working face of Oathill quarry looking north and east 20th October 2021



Working face of Oathill quarry looking west 20th October 2021