

**TGPC comments on additional information**

**Oathill Planning Application 21/0050/CWS73M (notice dated 18 Dec 2023 )**

Further to the comments submitted by TGPC dated 09 November 2023 and previous comments submitted by TGPC relating to the application for increasing production at Oathill Quarry (21/0050/CWS73M) this response also needs to be read in conjunction with comments TGPC previously submitted on the Oathill Application 19/0086/CWMAJM relating to traffic counts and environmental impacts.

TGPC has reviewed the Agent's subsequent response dated 15 November 2023 and welcome the positive clarifications that have been made addressing the cutting shed by stating that there will be no imports of materials for processing, lighting will be selected to protect dark skies and the shed will be removed at the end of operations. These points will need to be reflected in the proposed conditions.

A more structured approach to traffic management is also welcomed.

Significant concerns raised by TGPC have not been addressed relating to the failure to clarify the current phase of works at the Oathill Quarry and the need to increase HGV movements. As a consequence, the HGV movements in the proposed Traffic Management Plan are meaningless. TGPC's concerns relating to the reinstatement scheme have also not been addressed. These concerns are outlined in more detail below and are illustrated Annex A.

**1. Phase of operation.**

The proposal, to increase production from 50,000 tpa to 100,000 tpa for a three-year period, was requested to allow removal of the overlying rock layers to crush it as agricultural lime. Due to seasonal demand this would result in increased numbers of HGV movements during August and September.

Key questions asked by TGPC on the current status of the operations at Oathill remain unanswered. This is fundamental to the question as to whether an increase is necessary? It also opens the door to further questions in relation to the proposed traffic management plan.

- i. If the material has been removed there is no need to increase the HGV movements or increase the annual production limits.
- ii. If most of the material has been removed and the Cotswold Gold stone is accessible: What still needs to be removed? How long will it take? Could this be done with a lower number of HGV movements?
- iii. HGV movements in Aug / Sept are driven by the production of Agricultural lime. If this has been substantially removed why are the peak movements of 50 movements / day during Aug and Sept still necessary in the subsequent phase at 50,000 tpa? (Production of block stone and building aggregate would normally have a more even profile during the year which should be reflected in the proposed traffic management plan.)

Clarification of monthly production from the Quarry should be sought for the years 2019 to 2022, particularly given the comments made in the Environmental Statement Addendum May 2022 that *“the traffic counts already include the proposed increase in HGV movements recorded in 2019”*

Given the history of operations at the site it would be inappropriate to approve an increase without clarification of the need and then to defer a decision on moving from 100,000 back to 50,000 just based on enforcement visits.

## **2. Traffic Management Plan.**

The proposed movements in the HGV management plan Tables 1 & 2 should follow clear phases of work. This has not been provided as noted above.

From a health and safety perspective, an early priority should be to improve cleaning and prevent spillage of loads on bends. This would make roads safer for other users and it would help reduce dust levels. No HGVs should be allowed to leave site unless they are clean and appropriately loaded and sheeted.

No reference is made to a routing plan or limits on the number of daily movements through Ford. The Traffic assessments previously submitted proposed that 50% would go through Ford. Clarification is needed.

The Hydrock Report (referred to later in this response) highlights issues from noise exceeding national guidelines both during the night-time which includes early morning HGV movements (with arrivals before 07.00).

Both of these aspects are cumulative impacts associated with HGV movements from the cluster of quarries and will also need to be addressed and applied by the cluster as a whole. Accountability for cleaning roads adjacent to quarry access is relatively straightforward but a wider discussion relating to spills for reporting and clean up (eg in Ford and Toddington) is needed.

Additional comments on the proposed traffic management plan are included in Annex B to this response.

## **3. Reinstatement Plan**

The Agent’s response dated 15 Nov 2023 has avoided comment on the proposed changes to the slope profiles on the North, East and Southern rock faces. Instead, a cross section has only been provided for the west face, which was the only slope where significant increases in slope angle had **not** been proposed.

The areas of tree planting are not consistent between the current approved plan and the proposed plan when the plans are overlaid.

In any event, with the removal of the cutting shed a revised reinstatement plan is needed. We understand that options are available to improve the slope profiles and

biodiversity without the need for importation of materials for reinstatement. These should be investigated further and assessed in the context of the local landscape and enhancing biodiversity.

#### **4. Impacts on local communities**

The significance of the proposed increase in HGV movements has previously been dismissed by the Applicant on the basis that the proposed increase in movements would be less than 10%. As a consequence, no dust measurements were carried out on the B4077. It also dismissed any cumulative impacts from HGV movements in the Environmental Statement (19/0086/CWMAJM) Dec 2020 (*para 6.12*) that *“the potential for cumulative effects to be derived from transport, noise, air quality or visual impacts is assessed within the respective technical appendices .... In summary, no such cumulative impacts are envisaged on any ground.”*

The Environmental Statement para 3.5 dated May 2022 (21/0050/CWS73M) states that as *“the Traffic Assessment already factors in the HGV movements associated with this development proposal and those of neighbouring quarries .... no material change is anticipated”*.

Significant changes across the cluster of Quarries between Aug/ Sept 2019 and in March 2022 include: Cotswold Hill Quarry granted permission to import 300,000 tonnes of fill material and Guiting Quarry also reopened.

The 2019 (Environmental Statement 19/0086/CWMAJM) refers to traffic counts on the local roads providing details of the average number of HGV movements through Ford and Upper Coscombe in August and Sept 2019 (*Mode Transport Planning Report*) together with noise measurements in Ford (Air and Acoustic Consultants Report). Further HGV movements were measured in March 2022 (Environmental Statement Addendum May 2022). These show an increase in HGV movements in Ford and at Upper Coscombe.

Oathill Quarry is part of a cluster of quarries and as a consequence the access routes of the B4077 and Buckle Street are shared. Changes to production across the Cluster of Quarries, and traffic counts are illustrated in Annex A. Some of the readings quoted by the Applicant are not valid as the numbers are not consistent with adjacent readings (eg East of Guiting Quarry and West of Oathill entrance the readings do provide an important insight into changes in HGV movements on the B4077). The readings show that there has been a significant increase in HGV movements when the figures for March 2022 are compared with the figures for Sept 2019. Assuming that other quarries in the cluster have a similar production profile to Oathill it would not be unreasonable to expect an increase in figures for September 2022. Data on production across the cluster of quarries is limited but was provided by the MPA for the period to 2019.

The combination of the historic data and these changes confirms a significant increase compared to historic production levels across the area. The movements associated with the proposed additional 50,000 tonnes would normally add to the production figures.

If the proposed increase is already on the local roads, as inferred in the Environmental Statement, it reinforces the need to understand the status of operations at Oathill and the need, if any, to increase permitted exports above the existing limit of 50,000 tpa.

#### 5. Independent assessment by Hydrock

Given the increased HGV movements seen on local roads and the absence of meaningful measurements of noise and dust, Hydrock was contracted to measure the environmental impacts at Ford and Upper Coscombe. The Contract was hosted by TGPC with funding provided by local Parish Councils, GCC Councillors, CPRE and individuals. The scope of work and results were reviewed with the support of EHOs in CDC.

Details of the survey work and Hydrock Reports are included in two parts:

- **Environmental Noise, Vibration and Dust: 20 Oct 2023**  
Ref 26427-HYD-GRZ-Y-RP-ACEN-2802
- **Environmental Dust and Air Quality Measurements: 5 Oct 2023**  
Ref 26427-HYD-GRZ-Y-RP-AAIQ-2001-P02

The Hydrock Reports comment that both noise and dust levels are at a level that affects amenity and health.

The findings show that even with a lower number of HGV movements at the time of the noise readings the day time and night time noise levels exceeded national guidelines. The night-time period is 23.00 – 07.00 and the disturbance is mostly attributable to early morning arrivals of HGVs.

The significance of the comments made in 2019 that an increase in HGV movements would not increase the noise level is technically correct. In simple terms noise would be more persistent as the noise level is already at or near the maximum audible level for people. What was omitted in the Oathill Environmental Statement was a comment that the noise level was already unacceptable and is above UK national guidelines. The Hydrock summary on noise (page 4) states:

***“Any further increases in HGV movements should be considered in the context that acceptable levels are already exceeded, therefore any future application should be considerate of this rather than relying purely on an assessment of level change, which does not address the existing issue”.***

Hydrock reviewed the noise readings made in 2019 and stated that insufficient information was provided with the report to validate the assessment.

The dust measurements indicated high levels and are of concern that warrants further investigation. At Ford they are attributed to HGV movements and at Upper Coscombe the source is likely to be a combination of HGV movements and also the adjacent Guiting Quarry.

***“... results indicate that thresholds are exceeded for dust deposition at Upper Coscombe for both samples taken, and that dust settlement poses a high dust impact risk at both Upper Coscombe and Ford”.***

It was noted that *“Monitoring at Upper Coscombe was located 170m from Guiting Quarry, therefore quarry operations from this site may also contribute to the dust impacts monitored at Upper Coscombe”*

Further monitoring is recommended and comment is made that *“mitigation measures for reducing dust generated by HGV movements would be most effective at source.”* This aligns with the intentions of the Traffic Management Plan.

The assessment of P<sub>10</sub> measurements is a topic that probably requires further discussion before any additional surveys are undertaken for smaller particulates.

Vibration was not an issue at the locations measured in Ford and Upper Coscombe. During the survey work carried out in Ford cracks were observed in the east face of the stone arch bridge on the B4077. This was reported to GCC Highways for further investigation in June 2022, as cracking can be caused by repeated loading from the number and size of HGVs using this route.

We know, from concerns raised by Parish Councils across the area that impacts from HGVs accessing the cluster of quarries are not just seen in Ford and Upper Coscombe. Although no environmental readings were taken in Toddington or at Upper Slaughter during the Hydrock Study it is known that local residents in Toddington are affected by early morning HGVs, spills of stone on the roundabout. HGVs pass at speed on a key route for children accessing the local school. At Upper Slaughter the children’s nursery has had to be relocated due to the level of noise from passing HGVs. Across the area a number of local residents, who live by the local roads used to access the cluster of quarries, are known to have medical conditions that can be affected by noise and or dust.

## **6. Summary**

Clarifications relating to the cutting shed are welcomed and this needs to be included in the conditions.

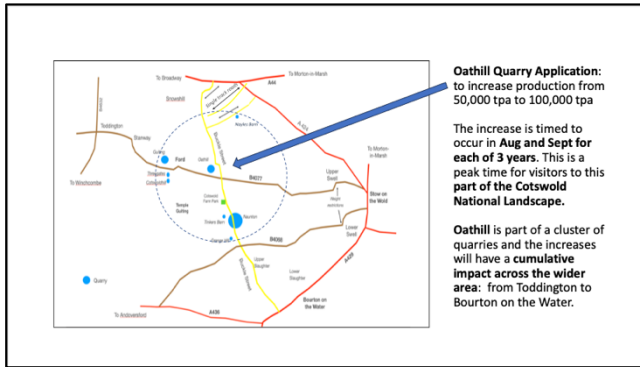
The Traffic Management plan is a positive step towards providing a framework to address impacts not just with this Application but across the cluster as a whole. This needs further development.

The Applicant’s response, dated 15 November 2023, fails to address TGPCs previous concerns relating to the need for the increase in HGV movements and the proposed changes to the slope profiles in the reinstatement scheme.

To be able to make an informed decision there is a need for clarity on the status of operations and justification for the increase in HGV movements at a peak time for visitors to this part of the Cotswold National Landscape. The findings of Hydrock confirm that far from increasing HGV movements we should be reducing the number and finding solutions to mitigate the impacts. The application to increase HGV movements and changes to the reinstatement scheme should be refused.

**Annex A: Illustrations to provide context and support to the comments made**

The attached illustrations provide context for the concerns raised by local residents as highlighted in these comments. The photographs have previously been shared with GCC in



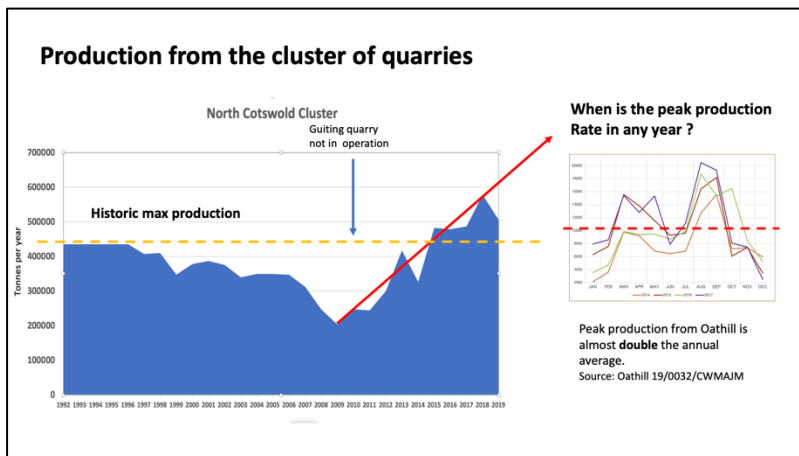
meetings and in the notes provided to the GCC Councillors in advance of the Planning Meeting held on 28 September 2023.

A request was made to formally recognise the cluster of quarries in March 2023. This was supported by 10 local Parish Councils, Cotswold National Landscape Board, CPRE and our local GCC Councillors.

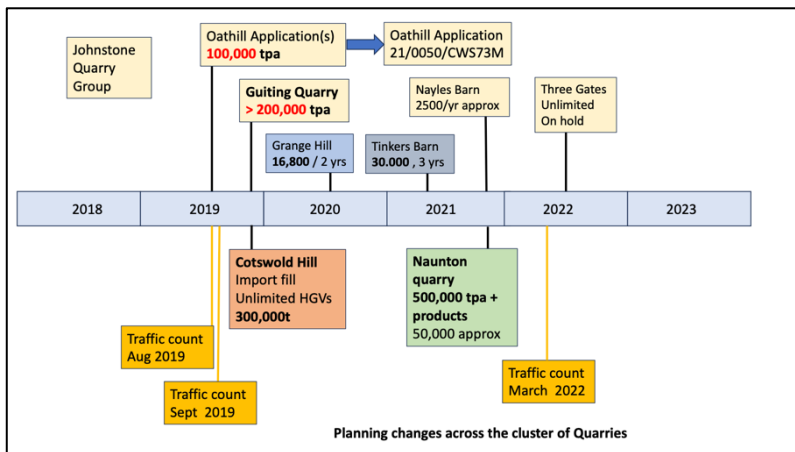
The B4077 and Buckle Street are used as the primary access routes. Buckle St reduces to a single-track road before the A44. Weight restrictions on bridges in Upper and Lower Swell limit the number of HGV movements towards Stow on the Wold.



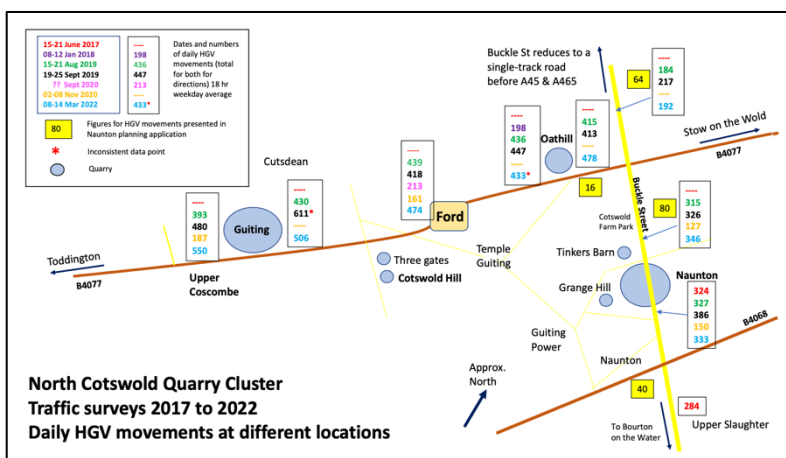
Oathill is located in the centre of the Cluster of Quarries.



Historic production figures provided by GCC for the cluster of quarries to 2019 provide context for the recent increases in production. The 2019 Oathill Application provides some insights into seasonal variation in production. Figures are not available for the other quarries in the cluster.



Recent planning applications illustrate the changes in production across the cluster between 2019 and 2023. Production at Naunton Quarry remains unchanged but the reopening of Guiting Quarry and importation of fill to Cotswold Hill Quarry add a significant number of HGVs on the B4077.



This is illustrated in the traffic counts presented as part of this Application taken in Aug & Sept 2019 and in March 2022.

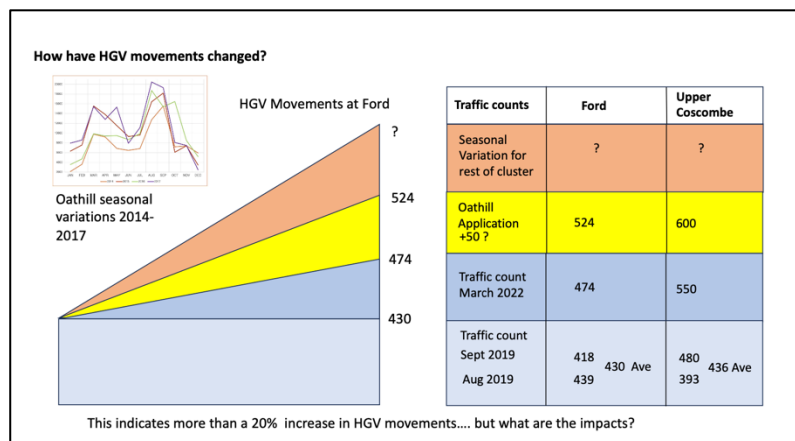
2019 is significant as it is before Cotswold Hill started to import fill materials and before Guiting Quarry was reactivated. The March 2022 figures clearly show a significant increase in HGV movements. Each load will

result in two movements. The figures show total movements.

Not all of the figures are directly comparable; for example, the figure of 611 movements to the east of Guiting Quarry is not credible given the adjacent traffic counts. Similarly the figures to the west of Oathill quarry in March 2022 are not consistent with those observed in Ford. It is impossible to lose 40 HGVs on this section of road!... further investigation showed that the readings were taken on different dates.

The increase in HGV movements is illustrated in the attached graph.

To keep things simple we have averaged the figures for Aug & Sept 2019. This shows a significant increase in HGV movements, of more than 10%, on the B4077 between 2019 and March 2022.



The proposed increase of 50 movements would normally add to these figures, as would seasonal variations from across the cluster in August and September. However, the Applicant has now stated that the figures in March 2022 already include the proposed increase. Production figures for Oathill from 2019 to 2022 have not been provided. Based on historic figures we could still expect September 2022 to be higher than March 2022.

The Hydrock Report is clear that the levels of noise and dust are high and that, far from increasing HGV movements, we should be reducing them!



Words and measurements do not adequately convey the impacts. Photographs taken by local residents clearly illustrate local concerns including but not limited to:

- the size of HGVs for narrow roads leading to erosion of road verges.
- Transfer of mud onto road from quarries.
- Badly loaded vehicles (with loads above the sides of HGVs) resulting in spills even though the HGV is sheeted.
- Some loads leave without sheeting.
- Spilled debris which creates a danger to other road users in Ford, on Stanway Hill and at the roundabout in Toddington.

- The road in Ford has no footpath and is part of a national trail.
- Speed of vehicles though local villages is a concern. It also contributes to airborne dust.
- Dust on the recycling bin occurred in a 24 hour period!



Although vibration recorded was not classed as “significant” the stone arch bridge in Ford, on the B4077, has visible cracks in the east face. This has been reported to GCC Highways. Cracking can be caused by repeated loading, which is possible from the number of HGVs using the B4077.



**Annex B: TGPC's Comments on the HGV Management Plan dated 07 December 2023**

- **HGV Management.** The proposed traffic management plan is a good starting point for improving practices. There are some specific points that need to be addressed. Some aspects will need to be considered in conjunction with other operators in the cluster of quarries. Clarify that the plan covers HGV movements for the export of materials from Oathill Quarry. It does not cover the import of materials for processing in the cutting shed or for reinstatement. Local observations note peak time HGV movements is mid-morning. Limits on the number of HGVs per hour should be considered.
- **Environmental and Safety impacts.** Noise, dust and debris discharged onto the highway affect safety and amenity of other road users, local residents, visitors and business across the area. This HGV Management Plan is a key part of this process to mitigate and manage impacts from HGVs accessing local roads from the cluster of quarries. Each Quarry Operator and HGV driver has a part to play in reducing the overall impacts affecting the safety and amenity.
- **Monitoring.** Needs to include tonnes and product mix in addition to daily records of HGV movements. It would help if the route used to and from the quarry is recorded.
- **Routing.** The current wording leaves it open for all of the movements to be routed through Ford in addition to those from other sites in the cluster of quarries. Use of the single-track roads to the north on Buckle St. has limited capacity.
- **Sheeting & Cleaning:** It is not just wheel washing. Reference needs to include cleaning the chassis and mudflaps. It is relatively easy to attribute mud on the road adjacent to the quarry entrance. Responsibility for debris on the road in Ford or the B4077 to Toddington is more difficult to attribute to a specific quarry. In addition to sheeting HGVs need to be loaded in a way that prevents movement and spillage on bends.  
*(Dust in Ford from the highway can only be attributable to HGVs from across the cluster. We frequently see HGVs loaded with no freeboard to retain aggregate movement at bends even if the load is sheeted. Cleaning and sheeting needs to be addressed across the cluster of quarries)*
- **Hours or operation.** Noise before 07.00 has an increased adverse impact on amenity of local residents. Arrival before 07.00 should be strongly discouraged. *A broader discussion is needed on the need for a later time for HGV arrivals across the cluster of quarries).*
- **Dust management:** The plan should include the adjacent stables. Ford will need to be addressed as a cumulative impact. A more open process would be appreciated involving local residents and local businesses both in the monitoring and results.
- **Complaints:** When stone is deposited at bends in Ford or Toddington who do local residents contact and who cleans it up? This needs to be addressed as a part of the cluster of quarries
- **HGV Movements (Tables 1 & 2)** The figures will need to be reviewed in the light of comments made on the need for any increase in HGV movements.