

Oathill Quarry: Ref 21/0050/CWS73M
Review of additional information dated March 2023

TGPC have reviewed the additional information provided by the Applicant (30/3/2023) and have concluded that the additional information presented does not support the need to double production for two months, over three years, during a peak time for visitors to this part of the Cotswold National Landscape.

There continues to be a need for a clear plan of work leading to final reinstatement that is consistent with the character of this area and does not require the importation of fill materials. Our review reaffirms a need to assess the cumulative impacts from this application with other increases from the cluster of quarries in this area.

Given the date of the GCC Highways comments of 25/10/2022 and the increase in proposed HGV movements the previous consultation response by GCC Highways should be reassessed.

Increased HGV Movements

The information provided by the Applicant states that the proposed increase in production, of 50,000 tpa, will occur during the months of August and September each year for three years, totalling 150,000 tonnes. It also states that the increase in production will be a combination of agricultural lime and crushed aggregate. This timing coincides with one of the busiest times for visitors to this part of the Cotswold National Landscape and it will contribute to the cumulative impacts the cluster of quarries has on the local area.

The GCC Highways response dated 25/10/2022 states that there is a need for more information to be able to understand the impacts that this proposal will have across the area. It is not clear whether GCC Highways were fully aware of the wider impacts across the cluster of quarries, including the Environmental Screening Assessment for Guiting Quarry dated 13 Oct 2022. The GCC Highways response also pre-dates the Environmental Screening Assessment for Three Gates Quarry, prepared on 12/12/2022. TGPC have questioned the number of HGV movements referred to in both of these Environmental Statements relating to the importation of fill at Cotswold Hill Quarry. The number of HGV movements observed by local residents is significantly more than that stated in the Screening Assessments.

The Applicant refers to 2500 additional loads of approx. 20 tonnes. Over a two-month period this equates to approx. 50 loads per day. For comparison with previous traffic counts, each load requires two movements resulting in 100 additional movements per day. No details have been provided of the routes these vehicles will take. If only 50% of the additional movements use the B4077 through Ford, the combination of this proposal with other increases across this cluster of quarries will be more than 20% (based on the Applicant's own traffic count data for Sept 2019 and March 2022). This is a significant increase and the assessment by GCC Highways of "no objection" should be revisited. It is noted that additional data identified by GCC Highways as being important has not been provided by the Applicant.

The Environmental Statement (Dec. 2019) incorrectly stated that there were no cumulative impacts with other applications in the area. The reopening of Guiting Quarry (which started preparatory operations to reactivate at the end of 2019) and importation of fill materials at Cotswold Hill following appeal approval 16/12/2019 have both contributed to increases of HGV

movements on the B4077. The Environmental Statement 21 0050 CWS73M para 3.3 states that increases in HGV movements had already been “factored in” and “no new development proposals to increase HGV movements exist.” If correct, this raises questions as to why there is a 10% increase in HGV traffic counts in Ford, as measured by the Applicant in March 2022.

Is there a need to increase the export of materials?

Production of lime, as previously noted by CPRE, CNLB and TGPC, is not consistent with quarrying in the Cotswold National Landscape. The GCC Minerals Local Plan (MLP) Strategy seeks to avoid wherever possible working of minerals from AONB designations, where the focus should be on the “protection of landscape quality, scenic beauty, cultural heritage and wildlife conservation”. It is also clear that to reduce environmental impacts there is a need for “progressive reinstatement that avoids adverse impacts on the amenity of local communities” MLP (para. 414). The Applicant has not presented a phased working programme through to completion of reinstatement.

It remains unclear why the proposed revised reinstatement scheme shows increased slope profile (approx. 1:1) compared to the current approved reinstatement scheme which uses a slope profile of approx. 1:2. As noted in previous comments from TGPC, the steeper profile proposed by the Applicant is not in keeping with the character of the area. It also increases safety risks for future land users. TGPC’s previous comments on the difference in retained materials between the two slope profiles is also 150,000 tonnes. The revised tree planting scheme is not consistent with removal of the proposed cutting shed.

If the reinstatement scheme is to be revised then it should conform to the objectives presented in the current MLP and reflect the character of the area, which is rolling hills. Leaving exposed cliff faces, particularly when there is no public access, makes no sense.

Assessment of Environmental Impacts

The Applicant states that the noise and air quality impacts have been assessed and reviewed by Environmental Health Officers. Details of the proposed air quality monitoring scheme have not been made available for public review.

It is also noted that concerns were expressed by Cotswold District Council on 30 /11/2021 about the potential increase in noise and particulates on the B4077. This is not referenced in the Applicant’s response dated 30 /3/2023.

Reference is made to earlier studies in the report by Air and Acoustics Ltd that both assessments concluded that the application would not result in significant adverse impacts. What is omitted, in the latest document, is that the assessment and statement in 2019 simply stated that as the increase in traffic would be less than 10% of the existing HGV movements the increases in noise and impact on air quality would not therefore be significant.

There is still a need to assess the environmental impacts including air quality and noise from the increased numbers of HGVs on the B4077 on both local residents and visitors to the area. It should be noted that Sept. 2019 predates the reopening of Guiting Quarry and also the increase in HGV movements associated with Cotswold Hill Quarry, both of which have had a cumulative impact on local roads.

Air quality: The supplementary air quality report by Air and Acoustics Ltd (dated 24/3/2023) states that air quality was assessed in 2019. This is misleading, as no air quality measurements were presented for the B4077 as it was dismissed by the Applicant on the basis that the proposed increase in HGV movements of less than 10% was not significant (19/0086/CWMAJM/Env/Stat). Passing HGVs contribute to this from a combination of un-sheeted loads, discharge of aggregate on bends, erosion of road margins and the transfer of mud from quarry operations onto the highway.

The air quality report states that Jackdaw's Castle is 800 m from Oathill Quarry but no assessment of air quality has been made even though the Consultants air quality technical note dated 09/5/2022 states there are "no relevant receptors within 1km of the operations". This is not correct. We understand that no measurements have been taken at the property and that there has been no consultation regarding future monitoring. Air quality reports fail to highlight that horses have a lower tolerance to airborne particulates and therefore a lower threshold of acceptance is needed together with closer monitoring. The sensitivity of equine establishments has previously been raised by Summerhill Vets to the Minerals Planning Authority.

Noise: Although noise readings were taken on the B4077 in 2019 no assessment was made other than a statement that they were considered "not significant", by the Applicant, as the proposed increase in HGV movements was less than 10% (19/0086/CWMAJM/Env /Stat). However, the noise readings from 2019 do provide an important reference point for the current application as they predate the reopening of Guiting Quarry and the importation of fill materials to Cotswold Hill Quarry.

What is clear from the readings presented in 2019 and subsequent visits to the area by EHOs is that the concerns raised by local residents need to be assessed. The noise readings show that early morning movements of HGVs, arriving early to sites across the area, cause significant disturbance before 07.00. The frequency and number of HGVs using the B4077 also results in a loss of amenity for local residents and visitors.

Conclusion

The additional information presented does not, in our view, support the need to double production for two months over each of three years, during a peak time for visitors to this part of the Cotswold National Landscape.

The proposed reinstatement scheme needs to be withdrawn and replaced by one that is consistent with the requirements and objectives of the MLP with a reinstated landform that reflects the character of the area, together with a sequence of working that avoids the need to import materials for reinstatement.

The increase in HGV movements in combination with this Application will result in a cumulative increase of HGV movements of > 20% compared to traffic counts in 2019, at a peak time for visitors to the area, even before any additional movements are considered with the Three Gates application. This increase in HGV movements confirms the need for a reassessment by GCC Highways of their statement of "no objection" made in the letter dated 25 Oct 2022. There is also a need to understand the current and proposed increases in HGV movements and the impact this would have on local residents, businesses and visitors to the area. This application would contribute to the cumulative impacts from the cluster of quarries in this area.