

Comments on Oathill Quarry Application 24/0057/CWS73M

TGPC has reviewed the documents submitted for the Oathill Application for the westward extension of the existing quarry for the purposes of providing walling stone for the A417 road works and strongly objects to the proposal to extend the period of time that excessive HGV movements will continue on the B4077, particularly during August and September, which will not just affect this Parish but also other Parishes across the area.

Outline of the proposed extension of high levels of production

The Application Planning Statement states that the work has environmental benefits by providing walling stone for the A417 roadworks at Birdlip, where extensive excavations and landfill operations are in progress. Given the depth of excavations and exposed rock structures in the cuttings it is surprising that the walling stone could not be produced at the A417 construction site; particularly as the volume of walling stone would be insignificant compared to the volume of stone that is being crushed and used for landfill.

The Oathill Planning Statement (4.13, Table 1) indicates 2 daily loads of walling stone are required over a 2-year period at approx. 5,000 tonnes per year (tpa). Waste materials, from accessing and producing the walling stone would be crushed and exported as agricultural lime and aggregate. This would be approx. 69,000 tpa for two years and will then reduce to approx. 47,000 tpa in year three. The crushed stone exports would have a significant peak in HGV movements during August and September, primarily due to the export of agricultural lime. We note that walling stone will only represent approx. **3.6%** of the total proposed exports from Oathill during the requested three-year extension period.

Environmental impacts from HGV Movements

The Environmental Statement dismisses environmental impacts from HGV movements on the grounds that the additional traffic is already permitted for Oathill and therefore there would not be a cumulative impact. It also dismisses amenity impacts of local residents and other road users.

Increased HGV movements in August and September affect local residents, visitors and other road users (including pedestrians, horse riders and cyclists) in this part of the Cotswold National Landscape. This causes a significant loss of amenity due to the size and number of HGVs. Traffic incidents, including discharge of stone onto other vehicles and the local roads have not included the wider area affected by HGV movements from Toddington to Upper Slaughter.

Noise readings, made by the Applicant in June 2024, are included in the supporting documentation but details of the location in Ford on the B4077 (and distance from the carriageway) are not clearly stated. Early morning noise in Ford is dismissed as being due to "wildlife". However, it is interesting to note that the noise readings are very similar to those recorded on the B4077 near the Oathill Quarry. The possibility that it was the same HGV passing through both Ford and the noise monitor by the quarry, seems not to have been considered. More particularly, no comment has been made on the acceptability of the traffic noise which recorded noise levels L_{Aeq} during daytime hours (07.00 to 23.00) of 62.9 dBA and at night (23.00 to 07.00) of 53.4.

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The Hydrock Report (commissioned by TGPC and funded by local residents, Parishes across the area and GCC Councillors) was issued to the GCC Minerals Planning Authority in response to the previous Oathill Planning Application 21/0050/CWS73M. The Hydrock Report states that the noise levels recorded in Ford and Upper Coscombe on the B4077 in October 2022 exceed National Guidelines. Noise levels recorded by Hydrock were similar to those presented by the Applicant!

What is the current status of operations at the Oathill Quarry?

The approved Conditions for Oathill Quarry (Application 21/0050/CWS73M) is based on a number of production phases; the first two of which were based on production rates of 100,000 tpa for a period of three years after which it would reduce to 50,000tpa. The reason given for the increased level of export was stated to be a need to access the underlying Guiting Gold stone. During the GCC site visit in March 2024 it was noted that the Quarry was approaching the end of Phase 2, a point reaffirmed by the Quarry Management team during the GCC Planning Meeting. From the photographs included with this current application it is abundantly clear from the exposed blocks of stone that Guiting Gold stone are widely accessible across the floor of the quarry. This significantly changes the premise on which the current Conditions for Application 21/0050/CWS73M and the Traffic Management plan is based, as the quarry should already be (or soon will be) reducing exports to 50,000 tpa from 100,000 tpa.

Reinstatement Options

The Oathill reinstatement plan approved in March 2024 was, in our view, a retrograde change from the previously approved scheme. Rock faces may be of interest to some geologists but extensive exposed cliffs with straight lines are not consistent with the rolling hills in this part of the Cotswold National Landscape. The Application goes to great lengths to demonstrate that the quarry is not visible from the surrounding countryside, forgetting that it is clearly visible from the B4077 and Buckle St during the winter, when trees shed their leaves.

Changing use from agriculture to limestone grassland is not an issue. The small quantity of walling stone that will be produced (assuming the A417 Project is unable to supply all of their needs on site) would not, by itself, have a significant impact; however, the extension of the period for higher levels of export, particularly during August and September significantly extends the period that local residents, visitors and other road users are adversely affected by HGV movements.

As the Oathill Quarry already has widespread access to the underlying Guiting Gold stone there is not the same need to crush and export all of the waste material.

Given the operating history at Oathill, where production has exceeded permitted limits over many years, instead of exporting the waste material, a greater proportion should be retained for reinstatement and the extent of exposed rock face could be significantly reduced. This would have the benefits of:

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- Providing walling stone for the A417 Project
- Reduce the need for extending the high number of HGV movements
- Improving the overall landscape whilst retaining some cliff faces
- Reduce the risks associated with exposed cliff faces

Traffic Management Scheme

The Traffic Management Scheme should not be used to replace the conditions for permitted export levels. It is a step in the right direction for management of HGVs but it needs application by operators across the whole of the cluster of quarries in our area to be fully effective. There is more that needs to be done with proactive monitoring by the Operators to ensure that corrective measures are proactively made, rather than waiting for reports from local residents or the GCC Enforcement Officers.

High levels of dust from HGVs on the B4077, noted in the Hydrock report, were attributable to passing HGVs. Further measurements on the B4077 would provide a good indication of the effectiveness of the improved cleaning process; safer loading of vehicles and proactive remedial measures taken to clean the local roads. (Periodic dust measurements on the north side of Oathill quarry should also be made to provide assurance that the dust management scheme is effective, particularly as horses are much more sensitive to dust than people)

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Based on the points above the application to extend Oathill Quarry to the west and to maintain exports at 100,000 tpa for an additional three years should be refused. Key points for this are summarised below:

- Fails to clearly present the current stage of work relative to the phases presented in support of application 21/0050/CWS73M, which allowed a temporary increase in HGV movements from Oathill to reach the end of Phase 2 work
- The basis for increased exports to remove waste materials to provide access to Guiting Gold reserves is no longer valid and alternative reinstatement options that utilise a greater proportion of waste materials have not been presented.
- Environmental noise impacts of existing HGV movements have not been presented in the Environmental Statement (thereby avoiding presenting data confirming that the readings exceed UK national guidance limits for noise).
- The supporting documents fail to recognise loss of amenity experienced by local residents, visitors and other road users.
- It is unclear whether the environmental impacts of producing walling stone from a quarry outside of the affected area for the A417 works have been fully assessed.
- Alternative options for dealing with the waste by products when producing the walling stone have not been presented.

Refusing an extension of time for increased HGV movements, requested with this application, would be a step in the right direction towards addressing these concerns,

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particularly when there are options both to produce walling stone and improve the local landscape.

GCC should be seeking to progressively reduce the number of HGV movements on our local roads, instead of extending the period local residents and visitors to this part of the Cotswold National Landscape are exposed to them. Reducing the peak numbers of HGV movements would be a significant starting point.

The GCC Minerals Local Plan (paragraph 164) is worth noting as it states .. *"strict controls are needed to manage multi-mineral workings to avoid unbalancing the acceptability of such sites due to overly intensified development. The heightened risk of generating unacceptable adverse impacts on the environment and local communities, and /or degrading the quality of valued landscapes ... must be prevented."*