

## TEMPLE GUITING PARISH COUNCIL

### Comments on revisions to the GCC Minerals Local Plan

Temple Guiting Parish Council (TGPC) first commented on the proposed Minerals Local Plan (MLP) in May 2018. Following our review of multiple quarrying applications in our area, we were requested by Councillor Nigel Moor to provide additional comments, which were submitted in June 2019.

Public comments on the MLP have now been formally reviewed and the proposed changes to the MLP have been issued for final comments. These include the Strategy Document and a document containing 52 pages of detailed proposed changes. The date for submitting comments on these changes is 11 September 2019.

#### Summary of proposed changes

- There are no significant comments to be made on the Strategy Document which lists policy statements and provides an overview of minerals production in Gloucestershire.
- The proposed detailed wording changes to the MLP (52 page document) address aggregate production as well as maximising the use of recycled materials.
- They include provisions aimed at reducing the environmental impacts from the cumulative effects or intensification of quarrying and associated production. There are also new provisions to reduce the effects of transporting materials to and from minerals workings. These are positive changes.

#### Conclusion

- The MLP does not state clearly how the changes will be monitored or how and when further changes would be made to the MLP to address adverse impacts that may occur.
- Effective enforcement will be needed to ensure compliance with the MLP. However, the MLP does not allow for improved enforcement resources.
- Good working relationships with the Minerals Team, the CCB and the parishes affected by intensive quarrying in the North Cotswolds will be needed to help address issues as they occur.
- To measure and monitor the effects of quarrying on the AONB, information is needed. This includes creating a baseline of HGV movements, environmental and biodiversity indicators, noise pollution, air quality, and road conditions. Ideally this base line would have been set several years ago so that the impact of current activities could be measured against them. There may be a case for setting a baseline which portrays a position better than the current position which is already far from ideal.
- The plan does not address one of the main concerns of the parish, which is the lack of an overall planned view of quarrying operations across the North Cotswold cluster. Instead of treating each application individually, the combined impact of all the quarries should be a major concern.
- It is difficult to assess whether the proposed changes to the MLP will have a positive or negative effect on this Parish.

#### Detailed comments

A number of changes to the proposed wording would make the text consistent with previously submitted comments by TGPC, as follows:

## TEMPLE GUITING PARISH COUNCIL

MLP 2018-2019 Main Modifications			
MM Reference	Proposed wording to MLP	TGPC Comment	Proposed action
MM 03	...but acknowledging that some aggregates may be sourced from outside of allocated areas <b>under certain circumstances</b>	The inclusion of the wording “under certain circumstances” is ambiguous and is open to interpretation	<b>Clarification is needed</b>
MM 05	proposes reinstatement to a <b>high standard</b> .	As previously commented reinstatement works in the AONB should be using <b>best practices</b> . Use of the wording <b>high standard</b> does not have a defined standard whereas <b>best practices</b> can be more readily tested. This would then be consistent with proposed wording change in MM06	Delete <b>high standard</b> and replace with <b>best practices</b>
MM 06	<b>Mineral development proposals will be permitted where they adopt best practice in the extraction, processing and transportation of primary minerals in order to minimise the amount of waste generated and make provision for the sustainable production of secondary and recycled aggregates, subject to the requirements to policy MW06</b>	Wording here makes reference to best practice (see comment ref MM 05).  <b>The proposed wording for best practice should not be limited to just the phases mentioned but should also include all processing and reinstatement.</b>	Add <b>processing and reinstatement</b> and delete the words “ <b>of primary minerals</b> ”
MM 21	... <b>small scale protracted timescale developments</b> and deletion of wording “ <b>which are likely to operate over a protracted timescale, experience low rates of working and periods of intermittency</b> ”	It is unclear what is now defined as small scale working as a result of this change. This affects subsequent clauses.	<b>Definition is required on small scale long term works</b>

## TEMPLE GUITING PARISH COUNCIL

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MM Reference	Proposed wording to MLP	TGPC Comment	Proposed action
MM 29	deletion of wording ..... <b>relatively small scale residual working</b>	Deletion of the words “ <b>relatively small scale residual working</b> ” opens the potential for activities from any adjacent site.  This has the potential to increase activity adversely affecting the local environment due to the cumulative effects of quarrying	As per MM21 definition of “small scale” and “close proximity.” is required.  Add the words ... <b>provided that the cumulative effects of quarrying in the area do not adversely affect the local environment.</b>
MM 30	working outside of allocations will <b>be permitted only where one or more of the following</b>	adding the words “ <b>one or more of the following</b> ” reduces the threshold requirement for permitting activities with adverse environmental consequences.	<b>Delete</b> the proposed wording “ <b>one or more of the following</b> ”  Change wording to read .... <b>will only be permitted where it can be demonstrated that there is no adverse impact on the local environment and.....(i), (ii), (iii).....</b>
MM 43	Wording on <b>technological advancements</b> reducing effects on <b>climate change</b>	Current proposed wording focuses on changes in the transport sector.  <b>Improved technology should also be also used in production and reinstatement</b> as these also involve the use of heavy machinery.	Broaden proposed wording to read technological advancements across <b>production, transport and reinstatement</b> are anticipated over the coming year, which will also make a valuable contribution towards tackling climate change.

## TEMPLE GUITING PARISH COUNCIL

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MM Reference	Proposed wording to MLP	TGPC Comment	Proposed action
MM 53	Proposed new wording <b>Irreplaceable habitats and geological assets must be retained and protected from deterioration unless this cannot be avoided because there are exceptional overriding reasons of demonstrable public benefit</b>	Recent reinstatement proposals to leave fault lines exposed are inconsistent with the requirements to protect the landscape in the cotswold AONB. The proposed wording.  The proposed wording is ambiguous particularly regarding geological assets.	Simplify wording to read: <b>Irreplaceable habitats must be retained and protected from deterioration unless there are exceptional overriding reasons of demonstrable public benefit. Geological features should be recorded and maintained for public record whilst preserving the character of the wider landscape.</b>
MM 75  (also affects other sections MM 67 to MM 87)	deletion of <b>will be required</b> and change to <b>should be required</b> for an EIA	Unclear why proposed changes refer to Daglingworth quarry.  For larger developments an EIA should be a basic requirement.	Change to read <b>will be required unless otherwise agreed with the Minerals Planning Authority</b>

### Additional comments

It is understood that the MLP is intended to address both existing and proposed mineral applications. The proposed changes do not include a clear statement to this effect. The MLP is also unclear as to the extent of its relevance to quarrying across the North Cotswolds. This is because many of the quarries in and close to the parish are not included in the list of 'preferred' quarrying sites.

This could be addressed in the forward section of the MLP and Strategy document and would help reduce potential ambiguity.

The document would also benefit from including a definition of what constitutes a quarry and of some of the other points, such as small scale quarry, noted above. The lack of a definition of a quarry has meant that quarry works have taken place close to the parish without the need for planning permission.