

Linda Townsend
Senior Planner
Gloucestershire County Council



22 January 2021

By email only to: Linda.Townsend@gloucestershire.gov.uk

APPLICATION NO: 19/0086/CWMAJM

DESCRIPTION: Variation of condition 7 (annual output of material) relating to planning consent 14/0101/CWMAJM dated 21/05/2015 to facilitate an increase of mineral export by 50,000 tonnes to a total of 100,000 tonnes per annum

LOCATION: Oathill Quarry, Fiddlers Green, Temple Guiting, Gloucestershire, GL54 5SG

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the further information that has been provided by the applicant in relation to the above planning application, as per the consultation notification dated 14 December 2020.

As you will be aware, the Board has previously objected to the proposed doubling of output at Oathill Quarry on two occasions, in letters dated 15 June 2020 (in relation to the same planning application) and 31 May 2019 (in relation to planning application 19/0032/CWMAJM). Therefore, this response should be considered in conjunction with the two previous responses.

The reasons that we gave for objecting to the proposed doubling of output in our two previous responses can be summarised as follows:

- The increase in HGV movements and the adverse effect that this would have on the tranquillity of the Cotswolds AONB.
- The cumulative impacts of the cluster of quarries in this locality.
- The questionable need for the increased output and the potential conflict with local and national policies, including the policies of the Cotswolds AONB Management Plan 2018-2023.

Therefore, a key consideration is whether the additional information that has subsequently been provided adequately addresses these concerns. This additional information consists of three documents:

- Geological Review
- Letter from Johnston Quarry Group
- Letter from David Jarvis Associates

Our analysis of these documents is provided in Appendix 1, below.

We acknowledge that the further information provided by the applicant does go some way to towards clarifying the need for the increased output. However, the information fails to adequately consider alternative options, such as the backfilling of worked out areas of the quarry. We are particularly concerned about the applicant's assertion that output would need to be increased at Guiting Quarry if the proposed increase in output at Oathill Quarry is not permitted. As explained in Appendix 1, this assertion indicates that agricultural lime and aggregates are important outputs in

Cotswolds Conservation Board

The Old Prison, Fosse Way, Northleach
Gloucestershire GL54 3JH
01451 862000
info@cotswoldsaonb.org.uk

The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty (AONB), managed and looked after by the Cotswolds Conservation Board.

cotswoldsaonb.org.uk

Chairman:
Brendan McCarthy
Vice Chair:
Rebecca Charley

their own right. This, in turn, undermines the applicant's assertion that their primary consideration is the high value dimension stone products.

Output of agricultural lime and aggregate should be kept to the minimum necessary to avoid sterilising the high value, dimension stone strata. We would strongly object to the output of agricultural lime and aggregate at Oathill Quarry, or Guiting Quarry, exceeding this minimum level.

Unfortunately, the applicant's comments relating to Guiting Quarry come across as a threat rather than as a well evidenced justification. They do nothing to help the operator's reputation as a 'good neighbour' to the local communities or as a responsible operator in a nationally protected landscape. On the contrary, they add weight to the need to restrict output at Guiting Quarry as part of the Review of Old Mineral Permissions (ROMP) that is currently being undertaken for that quarry.

The additional information does not address the impact of the increase in HGV movements on the tranquillity of the Cotswolds National Landscape or on the related topic of the amenity of local communities. Nor does it address cumulative impacts across the cluster of quarries in the locality of Buckle Street and the B4077. With multiple quarries in this cluster seeking to either continue, increase and / or re-start output, these are increasingly significant issues.

In order to address these issues, we recommend that a comprehensive assessment should be undertaken of cumulative impacts across this quarry cluster. Ideally, this assessment should be commissioned by the County Council, rather than by the quarry operators. Measures should then be put in place to manage these cumulative impacts in a way that allows for appropriate provision of dimension stone products whilst minimising adverse impacts on the Cotswolds National Landscape and on the amenity of local communities.

We recommend that planning decisions relating to this quarry cluster should be deferred until after this assessment has been undertaken. This recommendation applies particularly to the larger quarry sites in this cluster, including Naunton Quarry, Oathill Quarry and (if possible, under the ROMP process) Guiting Quarry.

If you have any queries regarding this response please do not hesitate to get in touch.

Yours sincerely,

A handwritten signature in black ink that reads "John Mills". The signature is written in a cursive style with a long, sweeping underline.

John Mills
Planning & Landscape Officer
john.mills@cotswoldsaonb.org.uk | 07808 391227

APPENDIX 1. COTSWOLDS CONSERVATION BOARD COMMENTS ON THE ADDITIONAL INFORMATION PROVIDED BY THE APPLICANT

Geological Review

The Geological Review document provides a useful explanation of the amount of material that will need to be moved in order to access and extract the Cotswold Cream and Guiting Gold strata from which the quarry's dimension stone products are derived.

As we have indicated in our previous responses, we recognise that provision should be made for the quarrying of limestone, at an appropriate scale, in the Cotswolds National Landscape. The primary use of the resulting quarry products should be to conserve and enhance the local distinctiveness of the built environment of the Cotswolds National Landscape.¹ In principle, where dimension stone products are being used in this way (and all other things being equal), we would not want the production of these products to be compromised as a result of excess by-product sterilising the mineral reserves.²

However, the Geological Review indicates that the Cotswold Cream and Guiting Gold strata has been worked out at the western end of the quarry and that the quarry operation is now heading in an easterly direction. As such, we are disappointed that no consideration has been given to moving at least a proportion of the excess by-product into the worked out areas as quarrying progresses and keeping it on site in the longer term, rather than exporting it. Presumably, if this by-product is stored in a worked out area, it would not interfere significantly with the production of the dimension stone products. If some of this by-product is kept on site, it could help to restore the quarry to a more natural landform.

Letter from Johnston Quarry Group

The letter from Johnston Quarry Group begins by helpfully clarifying that the operator's primary interest is to maximise the block and building and walling stone product, rather than aggregate or lime.

However, as with the Geological Review, the letter does not consider the scope for storing some of the by-product in worked out areas of the quarry without affecting the production of dimension stone products. If there is scope for this option then the adverse consequences of not granting planning permission might not apply as the production of dimension stone products would not be significantly affected.

It is disappointing and potentially misleading for the letter to suggest that the output at Guiting Quarry would have to be increased by 50,000 tonnes per annum (tpa) if the planning permission was not granted to increase the output at Oathill Quarry.

The Geological Review makes it very clear that the proposed increase in output at Oathill Quarry primarily relates to the removal of large quantities of low value by-product in order to access and extract the high value strata. The quantities involved are very specific to the geological conditions at Oathill Quarry (for example, depth of 'overburden') and bear no relation to the situation at Guiting Quarry.

¹ Policy CE3, paragraph 4, of the Cotswolds AONB Management Plan 2018-2023.

² It should be noted that Policy CE3 adds that '*any such mineral sites should be required to demonstrate that they do not have any significant adverse effects on the special qualities of the AONB or integrity of existing wildlife sites*'.

The applicant has provided no evidence to indicate that the same amount of overburden would need to be removed at Guiting Quarry in order to access and extract the high value strata there. Indeed, given that extensive quarrying has already taken place at Guiting Quarry, the high value strata may well be more readily accessible than at Oathill Quarry.

The applicant's assertions relating to Guiting Quarry potentially indicate that they would want to increase the output of agricultural lime and aggregates in their own right, even if this wasn't required to avoid sterilising the Cotswold Cream and Guiting Gold strata. If this was the case, it would undermine their assertion that their primary interest is to maximise the block and building and walling stone product and that the increased output is required in order to avoid sterilising the high value strata.

Letter from David Jarvis Associates

The letter from David Jarvis Associates reiterates that the safeguarding of the natural building stone would not be threatened by the proposed development because only waste stone material would be crushed for aggregate.

The Board's position on related issues is addressed through our comments on the Geological Review and on the letter from Johnston Quarry Products.