

31st May 2019

Linda Townsend
Senior Planner
Gloucestershire County Council



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

Dear Linda

19/0032/CWMAJM. Variation of condition 7 (Exportation of materials) relating to planning consent 14/0101/CWMAJM dated 21/05/2015 to increase the total quantity of mineral export from 50,000 to 100,000 tonnes per annum with the maximum quantity of any single mineral product export increased from 30,000 to 50,000 tonnes per annum. Oathill Quarry, Fiddlers Green, Temple Guiting, Gloucestershire, GL54 5SG.

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the above proposal. This response relates to the issue of whether or not an Environmental Impact Assessment (EIA) should be required. **The Board recommends that an EIA *should be required*.** The reasons for this recommendation are outlined below.

As the Board indicated in its response to planning application 18/0010/CWM, increasing HGV movements associated with quarry operations in the Cotswolds Area of Outstanding Natural Beauty (AONB) has the potential to adversely affect the tranquillity of the AONB. Tranquillity is one of the 'special qualities' of the Cotswolds AONB. In other words, it is one of the features of the AONB that makes the area so outstanding that it is in the nations' interest to safeguard it. Tranquillity is also one of the 'natural beauty' criteria that are taken into consideration by Natural England when designating AONBs. It is, therefore, an important consideration when having regard to the statutory purpose of AONB designation (i.e. conserving and enhancing the natural beauty of the AONB) and when assessing the likely environmental impacts of proposed developments.

As outlined in the applicant's 'Supporting Statement', the proposed variation of Condition 7 would involve an additional 5,000 HGV movements per annum. Table 1 of the Supporting Statement indicates that this would more than double the total number of HGV movements per annum.

Over half of these additional HGV movements would be in the months of August and September (1,425 and 1,455 additional movements respectively). This equates to an increase of 67 additional HGV movements per day in August and 65 additional HGV movements per day in September. In comparison, the HGV movements for other mineral products from this quarry in these two months would be just 416 and 334 movements, respectively (assuming compliance with existing conditions). As such, the proposed variation to Condition 7 would represent a 342% increase in the number of HGV movements in August and a 432% increase in the number of HGV movements in September. This is a significant increase in its own right.

Under Schedule 3 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, a key consideration when screening Schedule 2 developments is '*the cumulation of the impact with the impact of other existing and/or approved development*'. Oathill Quarry is in close proximity to several other quarries, which collectively impose a large number of HGV movements on the local B roads and minor roads of this section of the Cotswolds AONB. Several of these quarries, over recent months and years, have either

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

Cotswolds Conservation Board Fosse Way Northleach Gloucestershire GL54 3JH

Tel: 01451 862000 Fax: 01451 862001 Email: info@cotswoldsaonb.org.uk

Website: www.cotswoldsaonb.org.uk

applied for extensions (to increase the amount of mineral that can be extracted) or applied for conditions to be changed or removed, with varying degrees of success. These factors are all putting additional pressure on the local road network and on the tranquillity of the Cotswolds AONB.

The local Parish Councils regularly receive complaints and enquiries from parishioners regarding the issues surrounding quarrying including speeding HGV quarry vehicles, HGV vehicles in excess of the permitted number, HGV vehicles operating outside permitted hours, noise from quarries (both within and outside permitted operating hours), HGV vehicles using roads inappropriate for large vehicles, dangerous mud on the road, erosion of verges, and litter from HGV drivers, among others.

An example of the extent to which local residents are affected by these HGV movements is the fact a resident of Ford recently recorded 27 HGV movements on the B4077, outside their house in Ford, in a 1.5 hour period. If the proposed variation to Condition 7 was permitted, the number of HGV movements could potentially increase by an average of nine HGV movements over the same time period in the months of August and September (assuming that all of these additional HGV movements passed through Ford). This would represent a 33% increase in the total number of HGV movements through the village.

Taking all of these points into consideration, the Board considers that the proposed variation of Condition 7 would have a significant adverse effect on the tranquillity of the Cotswolds AONB, especially when considered in conjunction with the cumulative effects of HGV movements of other nearby quarries. As such, it would also have a significant adverse effects on the environment. Therefore, the Board recommends that an Environmental Impact Assessment (EIA) should be required

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 MRTPI
Planning and Landscape Officer

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty