

26th June 2020

Naomi Woodcock
Planning Officer
Oxfordshire County Council
County Hall
New Road
Oxford OX1 1ND



By email only to naomi.woodcock@oxfordshire.gov.uk

Dear Naomi

MW.0045/20 – S.73 application – Castle Barn Quarry

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the above planning application, which seeks permission for a revised restoration scheme at Castle Barn Quarry, which is located in the Cotswolds Area of Outstanding Natural Beauty (AONB).

The Board acknowledges that there are a number of positive aspects to the proposed, revised restoration scheme. For example, the Board welcomes the proposal to create habitats that would be beneficial for biodiversity.

However, the Board is very concerned by the fact that the applicant has been allowed to commercialise the restoration material that would have been required to achieve the original consented restoration profile. On the other hand, the Board recognises that it would not be appropriate to now import material to enable the consented restoration profile to be achieved.

The Board considers that there is considerable scope to further enhance the proposed restoration, particularly with regards to biodiversity. We would like to make a number of recommendations to help to achieve the full potential of the restoration scheme:

1. The restoration should focus on the creation of lowland calcareous grassland habitat, rather than 'grassland scrub mosaic' and scrub habitats.
2. The land between the two quarried areas should also be restored to lowland calcareous grassland, rather than to woodland.
3. The restoration scheme should include the land to the north-west of the access track, which was included in the consented restoration scheme.
4. The restoration scheme should include some habitat creation specifically for invertebrates.
5. The applicant should be required to provide a revised, up-to-date Aftercare Scheme that reflects the changes being made to the restoration scheme.
6. The Aftercare Scheme should identify the steps that will be taken to ensure that the newly created habitats will be managed appropriately in the longer term.
7. If planning permission is granted, a planning condition should be attached to the planning permission requiring appropriate long-term management to be secured by the end of the obligatory five year aftercare period.

The Board recommends that planning permission should not be granted until the above recommendations have been implemented.

Given that the Board considers that there is considerable scope to further enhance the proposed restoration scheme, we object to the planning application, including the revised

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

restoration scheme, as it is currently presented. However, the Board would be willing to review this this objection if the above recommendations are implemented.

Further information relating to the Board's concerns and recommendations is provided in Annex 1, below.

If you have any queries relating to the Board's response, please do 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 that extends to the right.

John Mills MRTPI
Planning & Landscape Officer

ANNEX 1. FURTHER COMMENTS FROM THE COTSWOLDS CONSERVATION BOARD RELATING TO PLANNING APPLICATION MW.0045/20

Restoration, aftercare and long-term management

Prioritising the creation of calcareous grassland habitat

The revised restoration scheme proposes the creation of 'grassland scrub mosaic' habitat in the quarried areas. It also specifically proposes creating scrub habitat at the foot of the steep slopes of the main (north east) quarried area.

The Board recognises that scrub can provide a useful habitat for some wildlife. However, scrub habitat is not identified as a priority habitat for the Cotswolds AONB in the Cotswolds AONB Management Plan.¹ Also, scrub will inevitably become established as a successional habitat, even on a well-managed site where other habitats are prioritised. As such, it is not necessary to pro-actively target the creation of scrub. If scrub creation is prioritised at the start of the restoration, this will quickly lead to scrub dominating and out-competing higher priority and more sensitive habitats.

A much higher priority for the Cotswolds AONB is lowland calcareous grassland.

In the 1930's, 40% of the Cotswolds AONB was covered in wildflower-rich grassland. However, agricultural intensification and changing land management practices have led to the loss of almost all of this grassland, with less than 1.5% remaining.

The flower-rich grasslands of the Cotswolds AONB, particularly its lowland calcareous grassland, are one of the AONB's 'special qualities'. In other words, they are one of the aspects of the AONB's natural beauty which make the distinctive and which are valuable, especially at a landscape scale. As one of the AONB's special qualities, these grasslands are also one of the key attributes on which the priorities for the conservation, management and enhancement of the AONB should be based.

For these reasons, the Board recommends that restoration scheme should replace the proposed 'grassland scrub mosaic' and 'scrub' habitats with lowland calcareous grassland habitat.

In addition, the Board recommends that the area between the two quarried areas should also be restored to lowland calcareous grassland, rather than to woodland. There are a number of reasons for this. Firstly, the proposed woodland in this location would act as a barrier, preventing connectivity between the grassland habitats in the two quarried areas. Secondly, creating woodland habitat in this location would quickly lead to this habitat dominating and out-competing the more sensitive grassland habitat. Thirdly, creating a larger area of lowland calcareous grassland would help to ensure that this grassland habitat was more ecologically viable and would make a more significant contribution to the network of lowland calcareous grassland habitats across the AONB.

With regards to sourcing lowland calcareous grassland seed, we recommend contacting the Board's Glorious Cotswold Grasslands Project² to discuss seed source and brush harvested seed supply suitable for the restoration work. Any gaps in the species content of locally

¹ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/12/Management-Plan-2018-23.pdf>.

Appendix 8.

² <https://www.cotswoldsaonb.org.uk/looking-after/our-grasslands-projects/glorious-cotswolds-grasslands/>

collected seed can be filled by further targeted collection or purchase of commercially grown seed if required.

The restoration scheme for Broadway Quarry, in the Worcestershire section of the Cotswolds AONB, provide a good example of a restoration scheme that prioritises the creation of lowland calcareous grassland. The Board recommends contacting Worcestershire County Council for details of the Broadway Quarry restoration and aftercare scheme.

The land to the north-west of the access track

The original restoration scheme showed woodland habitat being created on the land to the north-west of the access track. As such, woodland habitat would already form a significant component of the overall restoration scheme. This would provide further justification for lowland calcareous grassland to be the main habitat on the south-east side of the access track.

Including the land to the north-west of the access track in the revised restoration scheme would better reflect the overall mix of habitats that would be created.

For these reasons, the Board recommends that the land to the north-west of the access track should be included in the revised restoration scheme.

Habitat for invertebrates

Worked-out and newly restored mineral sites provide an important habitat for rare invertebrate species, primarily because of the areas of bare earth that they provide. Therefore, as part of the habitat creation, we recommend that that some habitat should be created specifically for invertebrates, for example, by creating low banks, hollows and / or very shallow benches. There should be scope to achieve this without adversely impacting on the establishment and management of the lowland calcareous grassland.

Aftercare Scheme

The applicant has not provide a revised Aftercare Scheme to reflect the significant changes that are proposed to the restoration scheme. An up-to-date Aftercare Scheme is an essential component of securing successful habitat creation. For this reason, the Board recommends that the applicant should be required to provide an up-to-date Aftercare Scheme.

The restoration scheme for Broadway Quarry, referred to above, provides a good example of an Aftercare Scheme that focusses on the creation of lowland calcareous grassland.

Establishment of good quality, lowland calcareous grassland is likely to take considerably longer than the obligatory five year aftercare period. It is important to ensure that, by the end of the aftercare period, ongoing, long term management is in place to ensure the successful establishment of the lowland calcareous grassland habitat and to build on the investment made in creating this grassland. The Aftercare Scheme should identify the steps that will be taken to make sure that this is achieved.

If planning permission is granted, the Board recommends that a planning condition should be attached to the planning permission which requires appropriate long-term management to in place by the end of the five year aftercare period.

Commercialisation of restoration material

The applicant's covering letter explains that a revised restoration scheme is required because there is not sufficient material to achieve the consented restoration profile. The letter also explains that this situation has arisen because the material that was required to achieve the consented restoration profile has been exported and sold as 'a viable mineral product'.

The Board is very concerned that the applicant has been allowed to commercialise the restoration material in this way. This sets a very unwelcome precedent for quarry restoration in the Cotswolds AONB and elsewhere. In particular, the Board is concerned that a similar proposal by the applicant to export 'excess' material as 'a viable mineral product' at its Oathill Quarry, in the Gloucestershire section of the AONB, could result in a similar outcome.

The Board is also concerned that this commercialisation of the restoration material would also have resulted in a considerable number of unnecessary HGV movements (approximately 7,500 HGV, based on a permitted output of 75,000 tonnes per annum). This, in turn, would have adversely affected the relative tranquillity of the AONB, which is one of the AONB's 'special qualities'. It would also probably have exacerbated air quality problems in Chipping Norton.

However, the Board recognises that it would not be appropriate to now import additional material in order to achieve the consented restoration profile. For example, this would result in further, excessive HGV movements. Instead, the Board's response focusses on ensuring the best possible restoration, aftercare and after-use of Castle Barn Quarry.