

CPRE GLOUCESTERSHIRE RESPONSE TO GLOUCESTERSHIRE MINERALS LOCAL PLAN: SITE OPTIONS AND DRAFT POLICY FRAMEWORK (June 2014 consultation)

Submitted to Gloucestershire County Council, 12 August 2014

Preliminary comments

1. CPRE acknowledges that, at this stage, Gloucestershire County Council (GCC) has adopted a process of including as options all sites which have a credible rock resource and in which landowners and/or mineral operators have expressed interest in working and that none of the sites is currently being promoted by GCC for inclusion in the Minerals Local Plan (MLP). We are content that the site appraisals in the Consultation Document (CD) are fair and objective.
2. CPRE's representations on the CD comprise comments on elements to which we are opposed and on those draft policies which we consider to be critical and with which we concur.
3. The text within the CD on which comment is being made is clearly identified. However, CPRE has not opted to simply answer questions posed by GCC, but to respond directly to the document as submitted for public consultation.

Section 1: Introduction - paras 1.2.5 – 1.2.7

1. These paras refer to the Duty to Co-operate (DtC) as required by the Localism Act and the NPPF. GCC's action, to date, on the DtC is amplified in an ancillary DtC paper dated June 2014.
2. Given the major environmental constraints in both the Cotswolds and Forest of Dean areas, CPRE considers that effective liaison/ negotiation with appropriate neighbouring authorities is essential to achieve the least environmentally damaging option to meet the necessary supply of primary aggregates, both crushed rock and sand and gravel. From the evidence set out in the CD and the supporting DtC paper it appears that no effective co-operation has so far been achieved.
3. Paras 2.1 – 2.6 of the DtC paper set out the background and issues clearly enough. There is specific recognition of the need for '*minimisation of environmental impacts in the Forest of Dean and the Cotswolds AONB*'.
4. Crucially, para 3.2 states '*As the duty is now in force the MPA will need to build on any previous work and develop the DtC process into the MLP plan preparation process from now and throughout the process to adoption. This does raise challenges for the Council as to when to co-operate (and co-ordinate) because plans of the different planning authorities are being prepared over different time frames*'.
5. The DtC applies to all mineral working. However, there are two elements where CPRE sees the procedure as especially critical in seeking to identify the least environmentally damaging option for the supply of the necessary resource. In respect of Carboniferous limestone for aggregate use we would expect effective co-operation with South Gloucestershire, North Somerset and Somerset and, possibly, Monmouthshire. In respect of sand and gravel we would expect effective co-operation with Wiltshire/Swindon and Oxfordshire for the Upper Thames Valley (UTV) and with Worcestershire for the Severn valley resource.
6. Para 4.5 (of the DtC paper) states '*although linkages were recognised between the market/resource areas for crushed rock (in particular crushed rock in South Gloucestershire and the Forest of Dean); the West of England*

had established what partners it needed to work with under joint working.....It was also noted that the adopted South Gloucestershire Core Strategy did allow sufficient annual provision to assist with shortfalls. The last export survey of 2009 still showed significant amounts of crushed rock aggregates being supplied from South Gloucestershire. However in practice the market was depressed in that only two quarries in South Gloucestershire were operational [out of 4]. As the current arrangement stands there was no prospect of testing any of the previous emerging policy options (from the SWRSS) for crushed rock (ie any possible shortfall in the Forest of Dean being met from other areas such as the West of England).

7. That last sentence appears to indicate a view that the DtC cannot be effectively implemented. CPRE accepts that the different authorities' plans being 'out of phase' creates a difficulty, but they were usually out of phase under the previous system. To suggest that makes it impractical to apply the DtC in a meaningful way is a significant indictment of a policy which is clearly defined in the Localism Act and the NPPF. Given the nature and extent of environmental constraints within Gloucestershire, CPRE considers that effective engagement in the DtC is crucial in order to minimise the adverse environmental consequences of maintaining the necessary supply of primary aggregates.
8. It is no part of CPRE's case that Gloucestershire's environment should be protected by shifting the problem onto another authority to find additional new resources. The fact is that there is demonstrably major spare capacity for crushed rock production in neighbouring authorities and in locations well suited to supplying Gloucestershire's main demand area of Gloucester/Cheltenham.
9. **Because of the ineffectiveness to date of the DtC process, CPRE considers that it is inappropriate to proceed at present with site options on the basis of no contribution from other MPA areas. Unless and until the DtC is shown to have been carried out effectively there is a risk that the resultant draft MLP will be deemed to be unsound.**

Section 2: The Spatial Strategy

1. The **Proposed Spatial Vision** includes the text '*Mineral working will act as a positive driver for protecting and enhancing the quality of environmental assets and designations such as the Cotswolds and Wye Valley AONBs.*' The justification for this surprising statement is not clear. Apart from provision of local building/roofing stone to maintain the fabric of traditional buildings, in particular in Cotswold towns and villages, mineral working within the AONBs has an entirely negative effect on the qualities for which AONB designation was made. CPRE proposes that the text should be deleted.
2. The **Proposed Strategic Priorities** are clear and soundly worded and CPRE supports them.

Section 3: Mineral safeguarding

1. CPRE supports the principle of Mineral Safeguarding and acknowledges that because a resource is safeguarded that does not mean that it will ever be worked.
2. For limestone resource areas CPRE considers that option 3 in the CD is the most appropriate choice.
3. For sandstone resource areas CPRE considers that option 3 is the most appropriate choice.

4. For sand and gravel CPRE sees a case for safeguarding the resource in the UTV, but this should be in conjunction with neighbouring MPAs to ensure that there is consistency across the whole resource area.
5. For sand and gravel within the Severn Vale CPRE sees a case for safeguarding the known deposits.
6. For the Triassic/Permian sandstone formations in the NE of the county CPRE considers that option 5 is the most appropriate.

Section 4: Construction Aggregates

1. GCC has produced calculations of demand for crushed rock and sand and gravel in accordance with current Government guidance and based on the average of the last 10 years' sales figures (LAA process). This is in principle 'plan, monitor and manage', which, in CPRE's view, is a major improvement on the previous 'predict and provide' process which, almost always, over-estimated demand.
2. For crushed rock, the 'demand' has been allocated on a 70/30% basis to the Forest of Dean and Cotswolds respectively. CPRE acknowledges that this split is based on historic patterns of demand and that the Carboniferous and Jurassic limestones have fundamentally different properties which influence their potential range of uses. In any case, the levels of environmental constraint are similar in the two areas.
3. For crushed rock, the result of applying the LAA is a 'shortfall' for the Forest of Dean of 2.06mt by 2030, rising to 13.26mt by 2040 (MLP period + 10 year residual landbank). For the Cotswolds rock resource there would be no shortfall within the MLP period, but a 1.81mt shortfall by 2040. All of this assumes no contribution from neighbouring MPAs following the DtC procedure.
4. For sand and gravel, the CD indicates that the great majority of production has come from the UTV. CPRE acknowledges that continuing to treat that area as the main future resource area is reasonable until adverse environmental consequences become unavoidable, when seeking a greater contribution from the Severn Vale may be appropriate. Joint working with neighbouring MPAs in the UTV resource area is essential to minimise adverse environmental consequences and ensuring that the total resource is maximised within the environmental constraints.
5. The **Strategic Policy Aim for Primary Aggregate Minerals – Meeting the Need** (p40) is reasonable and CPRE supports it.
6. With reference to the **Strategic Policy Aim for Primary Aggregate Minerals – Identifying Future Supply Areas** bullet point 1 (p41) CPRE proposes that after 'crushed rock' should be inserted '*,subject to environmental constraints,'*. Re. bullet point 2, CPRE proposes an addition to the first sentence thus:- '*as long as this can be achieved without significant adverse environmental consequences.'* We propose that the second sentence should be reworded thus:- '*In due course a greater contribution from the Severn Vale may be a more appropriate option'*."

7. With reference to the **Supporting Text for Strategic Policy Aim for Primary Aggregate Minerals – Identifying Future Supply Areas**, CPRE is broadly content with the draft text for crushed rock. The last sentence covering sand and gravel does not make sense. To read coherently 'either' should be replaced with 'also' and 'only' should be deleted.
8. **Proposed Policy for Preferred Areas for Aggregates** (p41). CPRE's concern with this policy is primarily one of prematurity. We do not believe that Preferred Areas should be identified until there has been effective liaison under the DtC (See CPRE's comments under Section 1). We also do not consider that it is appropriate to identify Preferred Areas to cover the period to 2037 (S&G) or 2040 (crushed rock) by extrapolating the current LAA figures. In effect that is falling back on a 'predict and provide' policy. It might not be a problem if there were no environmental constraints, but there is, in fact, a major problem in finding new sites in Gloucestershire because of the extent and nature of the environmental constraints.

Site option CRFD1: Stowe Hill/Clearwell

1. CPRE acknowledges that, at this stage, GCC has adopted a process of including as options all sites which have a credible rock resource and in which landowners and/or mineral operators have expressed interest in working.
2. We consider that the site appraisal in the CD is generally fair and objective, although the site lies to the east, not west, of Stowe Green.
3. For reasons given elsewhere in our representations on the CD, CPRE is challenging the amount of crushed rock reserves which need to be planned for.
4. Re. Parcel A, CPRE does not have reason to oppose its selection as a Preferred Area; it was part of the previously designated Preferred Area, has been classified as grade 4 agricultural land and is generally capable of being screened effectively.
5. Parcel B is highly visible from the B4228 road travelling south from the Orepool Inn and, due to the topography, would be very difficult to screen effectively. We do not have a detailed Agricultural Land Classification of the parcel (one should be provided before any further consideration is given to the parcel), but we believe it is highly probable that the majority of the site is at least grade 3a, possibly with areas of higher quality; ie 'best and most versatile land'. It is not feasible to restore a long life, deep rock quarry back to such quality, so there would be a loss of good quality land for food production. Working of Parcel B would also result in the elimination of a productive working farmstead – Longley Farm.
6. Parcel C is less visible from the B4228 and B4231 roads, but would be highly visible from the two public footpaths which cross it and the one which skirts its southern edge. The PROWs that cross the site would probably have to be diverted if quarrying were permitted, taking away some very attractive countryside walking opportunities. As with Parcel B it is probable that the area is predominantly of 'best and most versatile' agricultural land quality and an ALC survey should be conducted.
7. Parcels B and C are not within the Wye Valley AONB, although the boundary is close by at their southern edges.
8. There are a number of individual residences around the peripheries of Parcels B and C which would be severely disadvantaged by new quarry workings. For residents of Stowe Green a key issue would be re-location of

the crushing and processing plant, which has caused complaints about noise and dust for many years.

9. Given the substantial adverse environmental and amenity effects which would result from working Parcels B and C, CPRE considers that they should not be designated as Preferred Areas unless and until the obligations under the DtC have been fully pursued. Even then, more detailed assessment is required to determine which land, if any, within the parcels could be worked without unacceptable environmental consequences.
- 10. This raises the question of just how much capacity there is within the Forest of Dean to continue to supply substantial quantities of crushed rock when existing permitted reserves at Stowfield, Drybrook and Stowe Hill/ Clearwell are exhausted. In CPRE's view it should be recognised that there is very little further resource which can be worked within acceptable environmental limits.**

Site option CRFD4: Hewelsfield

1. CPRE acknowledges that, at this stage, GCC has adopted a process of including as options all sites which have a credible rock resource and in which landowners and/or mineral operators have expressed interest in working.
2. We consider that the site appraisal in the CD is fair and objective.
3. For reasons given elsewhere in our representations on the CD, CPRE is challenging the amount of crushed rock reserves which need to be planned for, but even if GCC's figures are used, that does not justify a case for taking CRFD4 forward as a Preferred Area.
4. The site is wholly within the Wye Valley AONB and, in accordance with paragraphs 115 and 116 of the NPPF, should only be granted consent for working in 'exceptional circumstances and where it can be demonstrated they are in the public interest'. There is no evidence of such a level of need.
5. Currently the Hewelsfield plateau is a peaceful landscape with dark skies at night. A new quarry would destroy that. Screening would not hide the noise, dust and vibration which inevitably accompany crushed rock operations. It would result in a major adverse effect on the AONB which could not be justified unless there was an overriding national need.
6. The site is almost all 'best and most versatile' agricultural land; the great majority is grade 2. Only about 18% of agricultural land in England is grade 2 (the highest grade – grade 1 – makes up only 3%). The creation of a new deep rock quarry would destroy that block of high grade land capable of producing food, which becomes a more critical factor as the population of the UK rises sharply. For shallow and relatively short term sand and gravel working it may be possible to conserve the top and subsoils on site and, subject to water-table, to restore to something near to the original quality. No such option is available for a long life, deep rock quarry. A proposal for 'offsetting' by re-laying the soils in another location would be an illusion.
7. The existing road infrastructure (the B4228) is acknowledged by Gloucestershire Highways to be inadequate to cope with new quarry traffic (Site Options document – p.47). Between Hewelsfield cross roads and St Briavels there are sections of the B4228 where two lorries cannot pass and where even a lorry and a car have to edge carefully past each other. To 'upgrade' that section of road would require a substantial engineering operation and presumably implementation of compulsory purchase procedures; it would, itself, be environmentally disruptive.

8. Even if such an operation were to be authorised and carried out, the problem would not be fully solved. New HGV traffic would still have to pass through St Briavels village, including directly past the local primary school. To the south there would remain a major bottleneck in the village of Woodcroft (where road widening is impracticable because of existing development). HGVs going south would also have to pass a substantial number of residential properties on Tidenham Chase + the large primary school at Tutshill. It is clear that there is no scope to adequately mitigate the transport problem by modifications to the B4228.
9. At the time of the 'omission site' representation, the landowner never provided any firm evidence that he could secure access to a strip of land on which a new private haul road could be constructed to link a new quarry at Woodlands Farm to the A48 road. We presume no such evidence is available now. Even if all relevant legal and engineering obstacles could be overcome, the construction of such a new road down the escarpment would itself have major adverse effects on landscape and local amenity.
10. Even having reached the A48, lorries going south would add to the now high level of congestion in Chepstow. Going north they would further reduce the quality of life for residents in Blakeney, Newnham and Westbury.
11. From the points cited in 7-10 above, we believe that an acceptable transport route to serve a new quarry at Hewelsfield cannot be practically achieved, short of a major public authority led infrastructure project justified on the grounds of national need. Clearly there is no such case to be made.
- 12. CPRE has set out in points 3 – 11 above the specific reasons why site CRFD4 is unsuitable for mineral working, other than in a situation of pressing national need. For the sum of those reasons we see no justification for further pursuing CRFD4 as a site option.**

When considering the options within the Jurassic limestone area it is clear from the numbers in paragraph 4.2.8 (Table 3) that there is no expected shortfall within the Plan period to 2030 and only a small shortfall by 2040 and this could be met by any one of the proposed options. We therefore consider that only one of the options needs to be taken forward into the MLP.

Site option CRCW1: Daglingworth

1. CPRE acknowledges that this option appears to meet 'need' as far as the Cotswolds limestone resource is concerned and believes it would be environmentally acceptable. The existing site is well managed and has little landscape impact. It is very well placed for access to the major road network. The proposed extension would also be very well screened from view largely because of the way the land lies and the existing screening planting. There may be future gains in sinking the plant further into the quarry. It is true that provision would have to be made to accommodate the bridleway which would cross between the existing and new extension but we believe this could be easily done with a bridge over a connecting road/track between the two major areas of workings.

Site option CRCW2: Huntsmans

1. Because it encroaches on a south facing hillside which is visible from a considerable distance CPRE considers that working of Parcel C would result in a substantial adverse effect on the landscape within the AONB and that it should not be identified as a Preferred Area. Development of area A has similar landscape effects but because it is an existing operation we do not

feel further deepening of the area for exploitation would add to the current situation. Area B is perfectly acceptable in landscape terms. We note that Huntsman's quarry is accessed through relatively minor roads and any increase in traffic levels could be beyond the road capacity. Any expansion should therefore be limited to roughly existing levels of production and activity. Because Daglingworth extension can more than meet the expected future demand we consider that expansion of Huntsman's quarry should be a second priority.

Site option CRCW3: Three gates

1. CPRE considers that this site option is unacceptable for designation as a Preferred Area on grounds of adverse effect on landscape within the AONB and inadequate transport infrastructure. The site is at a particularly dangerous stretch of road rising steeply to a blind cross-roads. Furthermore the site itself would be on a steeply sloping east facing hillside which would be highly visible both to the village of Ford and to passing traffic on the main road and from footpaths in the area. Development would highly damaging to the landscape at the point in the AONB.

Site option CRCW4: Oathill

1. The current site is tucked in under the hillside and well screened from view. The proposed extension would bring quarrying onto the ridge above and have high visibility. CPRE considers that working of this site would have significant adverse effect on the landscape within the AONB and that it should not be designated as a Preferred Area for aggregate production.

Site options SGCW1, 2, 4 and 8.

1. We have no objections to any of these options being preferred but note that for some the probability of their being exploited is low for economic and other reasons.

Site option SGCW3: Horcott/Lady Lamb Farm

1. There is considerable difference between sites A and B. The former abuts the main Cirencester road and would have a material adverse visual effect on the approach to the town particularly as the other side of the road has already been extensively developed for housing (not shown on the map). Fairford is a small rural town of historic importance and it is important that the approach retains its rural aspects. CPRE therefore considers that working of Parcel A would have a substantial adverse effect on landscape and local amenity and would result in aggravated traffic problems. It is also understood to be 'best and most versatile' agricultural land. In CPRE's view the parcel should not be designated as a Preferred Area. Site B does not suffer from these disadvantages except it too raises questions of the use of best and most versatile land.

Site options SGCW5: Down Ampney, SGCW6: Charlham Farm and SGCW7: Wetstone Bridge

1. CPRE's main concern here is of cumulative effect on the settlement of Down Ampney. We believe that there is significant scope for further working within the parcels identified in the CD which could make a substantial contribution to the supply of sand and gravel during the Plan period, but designation of whole parcels would have an unacceptable cumulative effect.
2. We cannot support the taking forward of these options as preferred as presented. Rather we suggest a full integrated plan for the area should be undertaken, taking into account all the sites and in consultation with the residents of Down Ampney. This would include an acceptable buffer zone round the village (and ideally also Meysey Hampton) and probably would result in only a portion of the sites being put forward as preferred options.
3. As these sites abut the border with Wiltshire there is a prospect of unacceptable cumulative effect if the two MPAs do not act jointly to review this area. The DtC is highly relevant to assessing these sites.

Proposed Policy for Proposals for the Working of Aggregates Outside of Preferred Areas (p86)

1. CPRE considers that the 1st bullet point is seriously flawed. Taken literally it indicates that if the contribution will address a 'shortfall' then it will be permitted – irrespective of environmental or amenity consequences. Clearly that is not a sensible policy. Changing 'or' to 'and' at the end of the bullet point would make it reasonable.
2. The 3rd bullet point also causes some concern as it implies approval of an extension to an existing quarry irrespective of adverse consequences. CPRE proposes an additional clause to bullet 3, after 'existing quarry' – '*which can be achieved without adverse environmental consequences*'.

Strategic Policy Aim for Alternative Aggregates (p88)

1. CPRE supports this policy aim.

Section 5: Non-aggregate minerals

1. Proposed Policy for Building Stone.

We agree the principle that the production of aggregates must be as a by-product of the winning of building/roofing stone. The wording however is potentially open to a conflicting interpretation as the first bullet point says that the proposals are predominantly for the production of stone while the second states that aggregates are to be a by-product. In contrast we believe the wording of the third bullet point is over restrictive and would imply that the extraction of building stone for new buildings would not be allowed. As this third bullet point defines the need we suggest it should be the first bullet point. Finally while we support the need for employment and making a positive contribution to the local economy we question whether this is a relevant criterion in a minerals plan and is likely to only cause confusion, for instance where an existing quarry is seeking an extension to replace reserves and may intend to invest in more efficient extraction. We propose that this bullet point should be dropped from the policy. (It is more relevant to the introductory notes and is alluded to in paragraph 5.2.3). With these considerations in mind we suggest the following wording for the policy:

“Proposed Policy for Building Stone.

Proposals for the winning and working of the county's key natural building and roofing stones will be permitted only where:-

- *The need for the stone is to help to conserve the historic built environment or maintain its local distinctiveness in new buildings in Gloucestershire or for use in the conservation of historic buildings built of matching materials; and*
- *It can be demonstrated that the above defined need for the stone cannot be met adequately from existing permitted reserves and that the purpose of the proposals is for the production of stone to be used as a natural building or roofing stone; and*
- *Any winning and working of rock for non building stone use:*
 - *is a by-product of, and is ancillary to, the production of the natural building or roofing stone and*
 - *is confined to that of the overlying or interbedded waste stone that has to be removed in order to work the natural building materials or waste stone arising from the dressing of the building stone and*
 - *its use for on-site landscaping or in current or future reclamation of the site has been maximised.*

Note; For clarity, in this policy natural building and roofing stone excludes artificially made building or roofing stone."

2. **Proposed Policy for Brick Clay and Proposed Policy for Engineering Clay.** It is not clear why the draft texts for these two policies are so different. Apart from the 'export' point, it seems to CPRE that the requirements for obtaining planning consent and for site restoration are very similar. We suggest that wording should be reconsidered and that a combined policy would be appropriate.
3. **Proposed Policy for Small Scale Coal Underground Mines.** CPRE supports this policy.
4. **Proposed Policy for Opencast Coal.** CPRE supports this policy.
5. **Proposed Policy for Re-working of Colliery Spoil Tips.** CPRE supports the thrust of this policy, but proposes text modification to improve clarity. We propose adding 'enhance' before 'wildlife' and changing 'and/or' to 'whilst conserving the'.
6. **Proposed Policy for Conventional and Unconventional Hydrocarbons.** CPRE supports the thrust of this policy, but notes the recent statement from Government that operations within nationally designated areas, including AONBs, will be permitted only in exceptional circumstances. That statement should be reflected in the policy. Because of the current lack of certainty about exploration for unconventional hydrocarbons there may be developments during the MLP adoption process which necessitate reviewing the policy and adding more detail.

Section 6: Environmental Considerations

1. **Proposed Policy for Flood Risk.** CPRE proposes that for clarity additional words should be included in the first paragraph:- after 'sequential approach' add 'to flood risk'.

2. **Proposed Policy for Water Quality.** CPRE proposes the following text modifications. After '*water environment*' add '*including groundwater*'. Before '*mitigate*' add '*fully*'.
3. **Proposed Landscape Policy** (p98/99). CPRE proposes that the text on working within AONBs (which we support) should be moved to the first part of the policy ie. reversed with the text on '*General landscape*'. We propose that '*General landscape*' should be changed to '*Landscapes not designated as AONBs nor likely to affect their setting*'. We propose that the text under that heading should be modified to improve clarity:- after '*Assessment*', change to read '*or where the adverse effect can be satisfactorily mitigated*'.
4. **Proposed Policy for Mineral Working in the Green Belt.** CPRE is content with this policy.
5. **Proposed Policy for Biodiversity and Geodiversity.** To improve clarity CPRE proposes that '*strategic nature areas*' should be added after '*Nature Map*'.
6. **Proposed Policy for the Historic Environment.** In CPRE's view the draft text lacks clarity and has flawed grammar. We recommend that it should be re-drafted to eliminate those weaknesses.
7. **Proposed Policy for Sustainable Transport.** CPRE supports the thrust of this policy. However, we suggest that, for clarity, '*Transport Statement*, '*Transport Assessment* and '*Travel Plan* should be defined in the supporting text. We are also unsure what is meant by '*sustainable development system for Gloucestershire*'. Should it read '*sustainable transport system*'?

Section 7: Minerals Restoration

1. **Proposed Strategic Aim for the Cotswold Water Park.** We agree that it is essential to include a strategic aim for reclamation and after use for the Cotswold Water Park. However, given the statutory DtC, we consider that the Strategic Aim should be more robustly worded. We suggest the following wording:

'Proposed Strategic Aim for the Cotswold Water Park

The County Council will take a leading role in conjunction with the Cotswold District Council in ensuring that the duty to cooperate with neighbouring authorities is translated into a firm landscape scale and holistic consistent process for determining reclamation and after use plans for minerals workings in the Cotswold Water Park. This process will include cooperation with the other stakeholders and local communities. The process will be regularly reviewed.'

2. **Proposed Restoration Policy.** CPRE supports this policy.
3. **Proposed Development Management Restoration Policy.** The first sentence is misleading and CPRE proposes that it should be deleted and replaced by '*Proposals for mineral development must be accompanied by satisfactory restoration proposals which should:*' There are also some typographical errors in the draft policy. In bullet 6 '*Providing*' should read '*Provide*'. In bullet 11 the text should presumably read '*For reclamation schemes for new areas of mineral extraction provide for the use on site of all soils and natural waste arising from mineral extraction and processing operations.*' In the last bullet point '*Aims*' should read '*Aim*'.

Section 8: Other Policies

1. **Proposed Policy for Ancillary Development.** CPRE supports this policy.
2. **Proposed Policy for Planning Obligations.** CPRE supports this policy.
3. **Proposed Policy for Borrow Pits.** CPRE supports this policy.
4. **Proposed Policy for Cumulative Impact.** CPRE considers that the draft text lacks clarity and proposes modifications as follows. After '*impact*' in the 1st paragraph add '*subject to compliance with other relevant policies in the Plan*'. Replace the 2nd and 3rd paragraphs with '*In assessing cumulative impact particular regard will be paid to noise, odour, traffic (including accessibility and sustainable transport), dust, health, ecology and visual impact*'.
5. **Proposed Policy for Soils.** CPRE supports the underlying principle of this policy, but proposes that the text should be modified. There appears to be no reason why impact of mineral working on the local economy should be cited in the context of soils conservation and we see no need for the second sentence. We propose that the third sentence should be modified to read '*Where some permanent loss of grades 1, 2 or 3a agricultural land is unavoidable (eg in a deep rock, long life quarry) to meet identified needs which cannot be met on poorer land, the operator will need to show how the soils can be re-used to most beneficial effect*'.
6. **Proposed Policy for Public Rights of Way.** The 2nd comma in the last sentence should be deleted.
7. **Proposed Policy for Buffer Zones.** CPRE supports this policy, but proposes adding '*nature,*' to point 4 ie '*nature, duration and direction...*'. This is to cover the fact that different types of mineral working have different levels of impact on other land uses; eg where there are blasting or crushing operations.
8. **Existing Policy E15 Protecting the Local Environment – Cotswold Water Park.** CPRE considers that this policy should be retained.