

Change is inevitable: it should be for the better

POSITION STATEMENT 2

STONE QUARRYING AND EXTRACTION OF OTHER MINERALS

Summary

CPRE encourages the maximum use of recycled construction aggregates, but recognises that extraction of new materials will continue to be required to meet society's needs.

We will oppose new quarries and extensions to existing aggregate quarries where we believe that would adversely affect existing AONBs or the prospective designation in the Forest of Dean; and seek to ensure that good practice is adhered to in the Cotswold Water Park.

We recognise the importance of local sources of building, roofing and walling stone in maintaining the distinctive character and quality of the county's built environment and landscape. Working of these resources will be supported where the scale is consistent with local need and there are not substantial adverse environmental consequences.

We will oppose opencast coal working in the Forest of Dean.

In respect of all mineral working proposals we will seek to ensure that the potential effects on landscape, rural settlements, hydrology, archaeology, biodiversity and best and most versatile agricultural land are fully evaluated before planning consent is given; transport consequences are examined thoroughly; and that there are appropriate detailed and credible restoration proposals which maximise environmental benefit.

The issues of fracking for gas and underground coal gasification are addressed in our Position Statement 8 on Energy Production.

Background and formal planning policy

Gloucestershire is regionally important as a source of crushed rock and sand and gravel. It is a source of dimension stone and roofing flags, both limestone and sandstone, which are evident in the many stone buildings, especially in the Cotswolds. Brick clay is locally worked. Coal was a major product from the Forest of Dean, but commercial production has ceased and future extraction by opencasting is highly unlikely in the light of national climate change policy¹.

A new Minerals Local Plan for Gloucestershire (MLP) was formally adopted by the County Council in March 2020, covering 2018 – 2032, after a long drawn-out preparation period during which CPRE responded to several public consultations. Sub-regional apportionment of primary aggregate production no longer applies and the minerals planning authority (MPA) is required to regularly review the need for aggregates based on analysing rolling averages of actual sales data. There is a duty to cooperate with all other relevant MPAs to achieve the optimum way of meeting society's needs for minerals.

1. Note: There is a long history of freemining in the Forest of Dean which is important in historical and cultural terms, but is no longer significant economically and is unlikely to create new environmental concerns.

Government planning policy on minerals is set out in chapter 17 of the National Planning Policy Framework (NPPF) as revised in July 2021. The policy covers both plan making and development control of planning applications; it is supplemented in more detail by national planning practice guidance. Significantly for Gloucestershire the NPPF sets more stringent constraints for minerals development in (or adversely affecting) AONBs than in undesignated countryside.

Environmental and land use planning issues

Almost all of the rock suitable for crushing to aggregate or for use as building stone lies within or adjacent to land designated as an AONB – the Jurassic limestone of the Cotswolds and the Carboniferous limestone and various sandstones of the Forest of Dean and Wye Valley. As a consequence, although the adopted MLP reflects the special planning constraints for AONBs set out in national planning policy, the scope for identifying more crushed rock reserves in Gloucestershire which do not adversely affect an AONB is almost non-existent.

Current sand and gravel production is concentrated in the Upper Thames valley along the border with Wiltshire. Workings are substantially in the Cotswold Water Park (CWP) for which there is a CWP Master Plan dating from 2008 (not part of the MLP and needing revision). With good post-quarrying restoration there is the opportunity to create attractive lakeland landscapes for water-based recreation and unique environmental areas. Policy SP5 of the Cotswold District Local Plan 2011 – 2031 refers specifically to appropriate after use options following mineral extraction in the CWP. There has also been a public consultation by Natural England on possible extension of the Site of Special Scientific Interest (SSSI) within the CWP. Sand and gravel also occurs in the lower Severn valley and in drift deposits. The Severn valley deposits have been extensively worked upstream in Worcestershire and a current proposal straddles the border with Tewkesbury Borough.

Small scale building and roofing stone quarries are important in Gloucestershire, especially in the Cotswolds. There have been issues at some Cotswold quarries over the production of significant quantities of crushed rock or agricultural lime on the grounds of production being an inevitable by-product of building stone extraction.

Apart from the major landscape issue, other environmental constraints which are locally significant to mineral working include effects on hydrology, archaeology, biodiversity and loss of high-quality agricultural land. Generation of HGV traffic on unsuitable country roads can severely affect tranquillity as well as pose new safety hazards. Where there are several quarries in close proximity (clusters) the cumulative adverse effect can be substantially increased.

Issues for the future

Gloucestershire faces the prospect of major growth in population and built development over the next 20 years, which is likely to affect the demand for aggregates. There is wide acceptance, in principle, of planning for the “best environmental options” to meet society’s mineral needs, but not yet an effective mechanism for so doing. Gloucestershire has particular problems because a high proportion of its aggregate resources lie within its AONBs.

We cannot say simply that adjacent authorities should “bail out Gloucestershire”, but there is a case to press that mechanisms should be explored to seek the best environmental options to meet society’s needs, including maximising efficient use of secondary and recycled aggregates. The NPPF requirement for effective collaboration between planning authorities - via the ‘duty to cooperate’ was not, in our view, sufficiently implemented during the preparation of the current MLP, though it was accepted as adequate by the planning inspector. CPRE will seek to encourage rigorous implementation of the duty to cooperate during reviews of the MLP, especially with regard to crushed rock reserves.

Policies in respect of mineral working in Gloucestershire

1. CPRE will oppose new quarries and extensions to existing aggregate quarries where we believe that would adversely affect existing AONBs in the county or the prospective designation in the Forest of Dean. Exceptionally, CPRE will not object where it accepts the criteria set out in paragraphs 176 and 177 of the NPPF have been met, that all practical mitigations have been incorporated and the case for permitting the application outweighs the unavoidable environmental consequences (this accords with Government guidance that quarrying in National Parks and AONBs should be the exception).
2. CPRE will seek to ensure that good practice is adhered to in the Cotswold Water Park and that settlements and environmental assets continue to be fully protected during the phased extraction of sand and gravel. We will expect restoration conditions and their implementation to be consistent with the good practice guidelines and landscape and environment strategies being developed by the Cotswold Water Park Trust.
3. CPRE recognises the importance of local sources of building, roofing and walling stone in maintaining the distinctive character and quality of the county’s built environment and landscape. Working of these resources will be supported where the scale is consistent with local need or to match materials for the maintenance of historic buildings and where there are not substantial adverse environmental consequences. We shall seek to ensure that where there are such proposals any production of aggregate is genuinely secondary and necessary for operational purposes.
4. CPRE will oppose opencast coal working in the Forest of Dean, which it considers to merit designation as an AONB, in the unlikely event that a proposal is made.
5. In respect of all mineral working proposals CPRE will seek to ensure that the potential effects on landscape, rural settlements, hydrology, archaeology, biodiversity and best and most versatile agricultural land are fully evaluated before planning consent is given. Transport consequences, for tranquillity as well for road safety, will be examined thoroughly. Where appropriate we shall seek to work with other relevant organisations to oppose environmentally damaging proposals.
6. Where we do not oppose mineral extraction, or cannot prevent it, we shall press for detailed and credible restoration proposals which maximise environmental benefit. Where technically feasible we shall seek progressive restoration as work proceeds. We shall seek to ensure after-use which maintains or enhances the environmental quality of the site, including the opportunity for good habitat creation. Where the land prior to working is of “best and most versatile” agricultural quality we would expect restoration to that quality wherever practicable.

Implementation of policies

CPRE Gloucestershire will make representations as necessary to mineral extraction proposals. We may seek to influence CPRE National Office responses to minerals related issues, including pressing for greater incentives to encourage more use of secondary and recycled aggregates. Responses to mineral planning applications or to monitoring and enforcement issues will be made by CPRE at either County or District level, depending on the issues involved. Our county minerals specialist will provide input where appropriate.

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CPRE Gloucestershire Position Statements are regularly reviewed and updated as necessary. They should be read as a set