



The countryside charity  
Gloucestershire

**Change is inevitable: it should be for the better**

## **POSITION STATEMENT**

### **STONE QUARRYING AND EXTRACTION OF OTHER MINERALS**

#### **Summary**

*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 on Energy.**

#### **Background**

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 production has almost ceased and the only likely future extraction, if allowed, would be by opencasting.

Work is in hand by the minerals planning authority (MPA) on a replacement for the former Minerals Local Plan (MLP). The process for adoption of the new plan follows changes in legislation and policies in the National Planning Policy Framework (NPPF). Sub-regional apportionment of primary aggregate production no longer applies and the MPA is required to assess need for aggregates on trends based on analysis of actual sales data. There is a duty to co-operate with all other relevant MPAs to achieve the optimum way of meeting society's needs for minerals.

The MPA is due to publish a draft of the new MLP for public consultation in late September 2016, which will include policies and, for aggregates, preferred sites for future extraction. After considering responses to the consultation the MPA will publish a final version which will be submitted to the Planning Inspectorate for approval on behalf of Government.

### **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 AONB – the Jurassic limestone of the Cotswolds and the Carboniferous limestone and various sandstones of the Forest of Dean and Wye Valley.

These landscape issues were recognised and led to the former MLP being adopted with a potential “shortfall” of 7 million tonnes of crushed rock due to environmental constraints. They also led directly to the adoption of a crushed rock “landbank” requirement of 7 years as against the 10 – 15 years adopted in most MLPs. The NPPF now specifies “at least” a 10 year landbank for crushed rock (paragraph 145). However, paragraph 145 also requires annual re-assessment of need using a rolling average of 10 years sales data, which is, in principle, “plan, monitor and manage” – an approach welcomed by CPRE. Potential problems are commercial confidentiality restrictions on access to sales data and the substantially reduced resources of the MPA.

Sand and gravel production is concentrated in the Upper Thames valley where there are special settlement protection policies in the Cotswold Water Park and the county’s only current Mineral Consultation Area (MCA) - within which district planning authorities should consult the County Council on proposed development which could “sterilise” mineral deposits (ie. could make it impractical ever to extract the mineral). Also with good post quarrying restoration there is the opportunity to create attractive lakeland landscapes for water based recreation and unique environmental areas. Sand and gravel also occurs in the lower Severn valley and in other drift deposits. Paragraph 143 of the NPPF indicates that MPAs should define Mineral Safeguarding Areas (MSAs) and MCAs based on the MSAs, “whilst not creating a presumption that resources defined will be worked”.

Paragraph 144 of the NPPF notes the special case of small scale building and roofing stone quarries, which are important in Gloucestershire, especially in the Cotswolds. Paragraph 149 states that “Permission should not be given for the extraction of coal unless...environmentally acceptable ... or if...national, local or community benefits...clearly outweigh the likely [environmental] impacts”. This should be helpful in challenging any future opencast coal proposals in the Forest of Dean.

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 tranquility as well as pose new safety hazards.

## **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 (paras 156 and 178 – 181) should be helpful and CPRE will carefully examine compliance with the ‘duty to co-operate’ in its response to the evolving MLP.

### 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 (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 (c.12 million tonnes have been estimated to be potentially recoverable).

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 the new minerals plan as it evolves. 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. CPRE’s minerals specialist will lead on this work, consulting Districts to ensure all views are taken into account, normally via our Policy Sub-committee.

CPRE Districts will take the lead in respect of mineral extraction within their areas in respect of new planning applications and of monitoring/ enforcement issues. The minerals specialist will be kept informed as appropriate.

**Updated October 2016**

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