Gloucestershire
COUNTY COUNCIL

Minerals Local Plan for Gloucestershire

2018 - 2032

Representations made in accordance with Regulation 20 | Incorporating the initial responses of the MPA

December 2018

Introduction

The representations received by Gloucestershire County Council to the Publication Minerals Local Plan for Gloucestershire (2018-2032) (hereafter referred to as the "MLP") have been recorded directly by respondents online or by the Council upon the Objective electronic database system. The database system has been used in the production of this report, which presents all representations received in accordance with Local Planning Regulation 20 and the initial response of the County Council in its capacity as the Mineral Planning Authority (MPA).

Guidance for the Publication MLP representations referencing system

To meet with Planning Inspectorate (PINS) Guidance the report has been organised in the policy order laid out in the Publication MLP. Sections have also been prepared for representations made in respect of key supporting documents such as the Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA).

All representations to the Publication MLP have been afforded a unique reference number. This number has been used where relevant in all other prescribed and supporting documents concerning the submission of the Publication MLP. The structure of the referencing system is set out as follows: -

- **ID reference –** the identification number used for each respondent who has inputted data / or has had their data recorded on the Objective database;
- **No. of representation –** a number attributed to each individual representation based on the order in which is related to the Publication MLP;
- **Section or policy –** a code that can be used to identify which supporting document or part of the plan each individual representation has been made. Table 1 shows the full list of referenced supporting documents / sections / policies (including policy supporting text);
- **Type of representation –** a code outlining the overall conclusions drawn from each individual representation (e.g. is the matter under consideration deemed to be 'sound' or 'unsound'; legally compliant or non-complaint; or a statement or comment**.)** Table 2 shows the full list of representation types that have been used.

Table 1: - Full list of codes used to reference supporting documents / sections / policies (including policy supporting text) of the Publication MLP

Code	Document / Section / Policy of the Publication MLP	Code	Document / Section / Policy of the Publication MLP	Code	Document / Section / Policy of the Publication MLP
DTC	Duty to Cooperate	**VIS**	Vision	**MW02**	Policy MW02 | Natural building stone
SA	Sustainability Appraisal	**OBS**	Objectives	**MW03**	Policy MW03 | Clay for civil engineering purposes
HRA	Habitat Regulations Assessment	**STR**	Strategy	**MW04**	Policy MW04 | Brick clay
PMP	Proposals (Policies) Map	**SR01**	Policy SR01 | Secondary and recycled aggregates	**MW05**	Policy MW05 | Coal
INT	Introduction to the Publication MLP	**MS01**	Policy MS01 | Non-minerals development within MSAs	**MW06**	Policy MW06 | Aggregate provision
SPT	Spatial Portrait	**MS02**	Policy MS02 | Safeguarding mineral infrastructure	**MA01**	Policy MA01 | Aggregate provision
DRI	Drivers for change	**MW01**	Policy MW01 | Aggregate provision	**MA02**	Policy MA02 | Aggregate provision

Code	Document / Section / Policy of the Publication MLP	Code	Document / Section / Policy of the Publication MLP	Code	Document / Section / Policy of the Publication MLP
DMT	Introductory text to Development management	**DM07**	Soil resources	**KDI**	Appendix 1: Key diagram
DM01	Policy DM01 | Amenity	**DM08**	Historic environment	**SMI**	Appendix 2: Safeguarded mineral infrastructure sites
DM02	Policy DM02 | Cumulative Impact	**DM09**	Landscape	**AGS**	Appendix 3: Forecast of agg. supplies and provision figures
DM03	Policy DM03 | Transport	**DM10**	Gloucester-Cheltenham Green Belt	**AL1**	Allocation 01: Land east of Stowe Hill Quarry
DM04	Policy DM04 | Flood risk	**DM11**	Aerodrome safeguarding and aviation safety	**AL2**	Allocation 02: Land west of Drybrook Quarry
DM05	Policy DM05 | Water resources	**MR01**	Policy MR01 | Restoration, aftercare and beneficial after-uses	**AL3**	Allocation 03: Depth extension to Stowfield Quarry
DM06	Policy DM06 | Biodiversity and geodiversity	**MON**	Managing and monitoring plan delivery	**AL4**	Allocation 04: Land northwest of Daglingworth Quarry

Code	Document / Section / Policy of the Publication MLP
AL5	Allocation 05: Land south and west of Naunton Quarry
AL6	Allocation 06: Land south east of Down Ampney
AL7	Allocation 07: Land at Lady Lamb Farm, west of Fairford
OTH	Other comments not attributable to sections / policies of the MLP

Table 2: Full list of codes used to describe the type of representation made to the Publication MLP

Code	Type of representation made	Code	Type of representation made
SND	Sound and / or legally complaint policy or supporting text	**ULEG**	Legally non-compliant (in respect of DtC / SA and HRA)
USND	Unsound and / or legally non-compliant policy or supporting text	**COM**	A comment that doesn't clearly support or objection to the MLP
LEG	Legally complaint (in respect of DtC / SA / or HRA)		

Representations to the Publication MLP | in policy order

Duty to Cooperate (DtC)				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	1/	DTC/	LEG
Chris McFarling	855353/	1/	DTC/	NLEG
Campaign to Protect Rural England	801907/	1/	DTC/	NLEG
Forest of Dean District Council	852145/	1/	DTC/	LEG
Heather James	1169539/	1/	DTC/	NLEG
John James	855340/	1/	DTC/	NLEG
Michael Carr	1164090/	1/	DTC/	LEG
Nicola Packer	1028219/	1/	DTC/	NLEG
Farmcare Trading Ltd	1038720/	1/	DTC/	LEG
Saleem Shamash	854632/	1/	DTC/	NLEG
South Gloucestershire Council	794755/	1/	DTC/	LEG
Temple Guiting Parish Council	1169771/	1/	DTC/	LEG
Sustainability Appraisal (SA)				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	2/	SA/	LEG
Andrew Scarth	849901/	1/	SA/	LEG
Chris McFarling	855353/	2/	SA/	NLEG
Forest of Dean District Council	852145/	2/	SA/	LEG
John James	855340/	2/	SA/	NLEG
Michael Carr	1164090/	2/	SA/	LEG
Nicola Packer	1028219/	2/	SA/	NLEG
Farmcare Trading Ltd	1038720/	2/	SA/	LEG
South Gloucestershire Council	794755/	2/	SA/	LEG
Temple Guiting Parish Council	1169771/	2/	SA/	LEG
Habitat Regulations Assessment (HRA)				
Respondent	**Representation Reference**			
Aggregate Industries	1164737	3/	HRA/	LEG
Chris McFarling	855353/	3/	HRA/	NLEG
Forest of Dean District Council	852145/	3/	HRA/	LEG
Michael Carr	1164090/	3/	HRA/	LEG
Natural England	1116790/	1/	HRA/	COM

Nicola Packer	1028219/	3/	HRA/	NLEG
Farmcare Trading Ltd	1038720/	3/	HRA/	LEG
Temple Guiting Parish Council	1169771/	3/	HRA/	LEG
Proposals (Policies) Map				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	4/	PMP/	SND
Chris McFarling	855353/	4/	PMP/	USND
Forest of Dean District Council	852145/	4/	PMP/	USND
Michael Carr	1164090/	4/	PMP/	SND
Nicola Packer	1028219/	4/	PMP/	USND
Farmcare Trading Ltd	1038720/	4/	PMP/	SND
Temple Guiting Parish Council	1169771/	4/	PMP/	SND
Publication MLP Section 1: Introduction | Pages 1 to 5				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	5/	INT/	SND
Chris McFarling	855353/	5/	INT/	SND
Michael Carr	1164090/	5/	INT/	SND
Nicola Packer	1028219/	5/	INT/	USND
Nicola Packer	1028219/	5/	INT/	USND
Farmcare Trading Ltd	1038720/	5/	INT/	SND
Temple Guiting Parish Council	1169771/	5/	INT/	USND
Publication MLP Section 2: Spatial Portrait | Pages 6 to 15				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	6/	SPT/	SND
Chris McFarling	855353/	6/	SPT/	SND
Forest of Dean District Council	852145/	5/	SPT/	SND
Michael Carr	1164090/	6/	SPT/	SND
Nicola Packer	1028219/	6/	SPT/	USND
Farmcare Trading Ltd	1038720/	6/	SPT/	SND
Historic England	793641/	1/	SPT/	COM
South Gloucestershire Council	794755/	3/	SPT/	COM
Temple Guiting Parish Council	1169771/	6/	SPT/	SND
Publication MLP Section 3: Drivers for Change | Pages 16 to 19				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	7/	DRI/	SND

Chris McFarling	855353/	7/	DRI/	USND
Elliott & Sons (Cheltenham) Ltd	793547/	1/	DRI/	SND
Hills Quarry Products Ltd	808023/	1/	DRI/	COM
Michael Carr	1164090/	7/	DRI/	SND
Nicola Packer	1028219/	7/	DRI/	USND
Farmcare Trading Ltd	1038720/	7/	DRI/	SND
Publication MLP Section 4: Vision and supporting text | Pages 20 to 21				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	8/	VIS/	SND
Aggregate Industries	1164737/	9/	VIS/	SND
Chris McFarling	855353/	8/	VIS/	USND
Chris McFarling	855353/	9/	VIS/	USND
Hills Quarry Products Ltd	808023/	2/	VIS/	COM
Michael Carr	1164090/	8/	VIS/	SND
Michael Carr	1164090/	9/	VIS/	SND
Nicola Packer	1028219/	8/	VIS/	USND
Farmcare Trading Ltd	1038720/	8/	VIS/	SND
Farmcare Trading Ltd	1038720/	9/	VIS/	SND
South Gloucestershire Council	794755/	4/	VIS/	SND
South Gloucestershire Council	794755/	5/	VIS/	SND
Publication MLP Section 4: Objectives and supporting text | Pages 21 to 25				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	10/	OBS/	SND
Aggregate Industries	1164737/	11/	OBS/	SND
Breedon Aggregates	924705/	1/	OBS/	USND
Chris McFarling	855353/	10/	OBS/	USND
Chris McFarling	855353/	11/	OBS/	USND
Michael Carr	1164090/	10/	OBS/	SND
Michael Carr	1164090/	11/	OBS/	SND
Northcot Brick Ltd	794035/	1/	OBS/	SND
Farmcare Trading Ltd	1038720/	10/	OBS/	SND
Farmcare Trading Ltd	1038720/	11/	OBS/	SND
Publication MLP Section 5: Strategy and supporting text | Pages 26 to 28				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	12/	STR/	SND

Aggregate Industries	1164737/	13/	STR/	SND
Breedon Aggregates	924705/	2/	STR/	USND
Chris McFarling	855353/	12/	STR/	USND
Chris McFarling	855353/	13/	STR/	SND
Highways England	858234/	1/	STR/	SND
Hills Quarry Products Ltd	808023/	3/	STR/	COM
Michael Carr	1164090/	12/	STR/	SND
Michael Carr	1164090/	13/	STR/	SND
Nicola Packer	1028219/	9/	STR/	USND
Farmcare Trading Ltd	1038720/	12/	STR/	SND
Farmcare Trading Ltd	1038720/	13/	STR/	SND
South Gloucestershire Council	794755/	6/	STR/	SND
Temple Guiting Parish Council	1169771/	7/	STR/	SND
Publication MLP Section 6: Secondary & recycled aggregate supplies (Policy SR01 and supporting text) | Pages 29 to 32				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	14/	SR01/	SND
Aggregate Industries	1164737/	15/	SR01/	SND
Breedon Aggregates	924705/	3/	SR01/	USND
Chris McFarling	855353/	14/	SR01/	SND
Chris McFarling	855353/	15/	SR01/	USND
Cotswold Hill Stone Masonry	820738/	1/	SR01/	USND
Cotswold Stone Quarries	793895/	1/	SR01/	USND
Hills Quarry Products Ltd	808023/	4/	SR01/	COM
Michael Carr	1164090/	14/	SR01/	SND
Michael Carr	1164090/	15/	SR01/	SND
Nicola Packer	1028219/	10/	SR01/	USND
Nicola Packer	1028219/	11/	SR01/	USND
Farmcare Trading Ltd	1038720/	14/	SR01/	SND
Farmcare Trading Ltd	1038720/	15/	SR01/	SND
Smiths (Gloucester) Ltd	802358/	1/	SR01/	USND
South Gloucestershire Council	794755/	7/	SR01/	SND
Stanway Stone	793504/	1/	SR01/	USND
Syreford Quarries & Masonry Ltd	794030/	1/	SR01/	USND
Publication MLP Section 7: Mineral safeguarding (Policy MS01 and supporting text) | Pages 33 to 38				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	16/	MS01/	SND

Aggregate Industries	1164737/	17/	MS01/	SND
Breedon Aggregates	924705/	4/	MS01/	USND
Chris McFarling	855353/	16/	MS01/	USND
Chris McFarling	855353/	17/	MS01/	USND
Forest of Dean District Council	852145/	6/	MS01/	USND
Forest of Dean District Council	852145/	7/	MS01/	USND
Hills Quarry Products Ltd	808023/	5/	MS01/	USND
Michael Carr	1164090/	16/	MS01/	SND
Michael Carr	1164090/	17/	MS01/	SND
Northcot Brick Ltd	794035/	2/	MS01/	SND
Farmcare Trading Ltd	1038720/	16/	MS01/	SND
Farmcare Trading Ltd	1038720/	17/	MS01/	SND
South Gloucestershire Council	794755/	8/	MS01/	SND
Publication MLP Section 7: Mineral safeguarding (Policy MS02 and supporting text) | Pages 39 to 41				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	18/	MS02/	SND
Aggregate Industries	1164737/	19/	MS02/	SND
Cheltenham Borough Council	853003/	1/	MS02/	USND
Elliott & Sons (Cheltenham) Ltd	793547/	2/	MS02/	USND
Hills Quarry Products Ltd	808023/	6/	MS02/	SND
Michael Carr	1164090/	18/	MS02/	SND
Michael Carr	1164090/	19/	MS02/	SND
Farmcare Trading Ltd	1038720/	18/	MS02/	SND
Farmcare Trading Ltd	1038720/	19/	MS02/	SND
South Gloucestershire Council	794755/	9/	MS02/	SND
Publication MLP Section 8: the future supply of minerals – Aggregates (Policy MW01 and supporting text) | Pages 42 to 47				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	20/	MW01/	SND
Aggregate Industries	1164737/	21/	MW01/	SND
Hills Quarry Products Ltd	808023/	7/	MW01/	COM
Hills Quarry Products Ltd	808023/	8/	MW01/	COM
Michael Carr	1164090/	20/	MW01/	SND
Nicola Packer	1028219/	12/	MW01/	USND
Farmcare Trading Ltd	1038720/	20/	MW01/	SND
Farmcare Trading Ltd	1038720/	21/	MW01/	SND
South Gloucestershire Council	794755/	10/	MW01/	SND

Worcestershire County Council	807759/	1/	MW01/	COM

Publication MLP Section 8: the future supply of minerals – Natural building stone (Policy MW02 and supporting text) | Pages 48 to 51				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	22/	MW02/	SND
Aggregate Industries	1164737/	23/	MW02/	SND
Cotswold Hill Stone Masonry	820738/	2/	MW02/	USND
Cotswold Hill Stone Masonry	820738/	3/	MW02/	USND
Cotswold Stone Quarries	793895/	2/	MW02/	USND
Cotswold Stone Quarries	793895/	3/	MW02/	USND
Forest of Dean Stone Firms	1170897/	1/	MW02/	USND
Forest of Dean Stone Firms	1170897/	2/	MW02/	USND
Farmcare Trading Ltd	1038720/	22/	MW02/	SND
Farmcare Trading Ltd	1038720/	23/	MW02/	SND
Smiths (Gloucester) Ltd	802358/	2/	MW02/	USND
Smiths (Gloucester) Ltd	802358/	3/	MW02/	USND
South Gloucestershire Council	794755/	11/	MW02/	SND
Stanway Stone	793504/	2/	MW02/	USND
Stanway Stone	793504/	3/	MW02/	USND
Syreford Quarries & Masonry Ltd	794030/	2/	MW02/	USND
Syreford Quarries & Masonry Ltd	794030/	3/	MW02/	USND
Temple Guiting Parish Council	1169771/	8/	MW02/	USND

Publication MLP Section 8: the future supply of minerals – Clay for civil engineering purposes (Policy MW03 and supporting text) | Pages 52 to 55				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	24/	MW03/	SND
Aggregate Industries	1164737/	25/	MW03/	SND
Farmcare Trading Ltd	1038720/	24/	MW03/	SND
Farmcare Trading Ltd	1038720/	25/	MW03/	SND
South Gloucestershire Council	794755/	12/	MW03/	SND

Publication MLP Section 8: the future supply of minerals – Brickclay (Policy MW04 and supporting text) | Pages 56 to 58				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	26/	MW04/	SND
Aggregate Industries	1164737/	27/	MW04/	SND
Forest of Dean District Council	852145/	8/	MW04/	SND
Northcot Brick Ltd	794035/	3/	MW04/	SND
Northcot Brick Ltd	794035/	4/	MW04/	SND

Farmcare Trading Ltd	1038720/	26/	MW04/	SND
Farmcare Trading Ltd	1038720/	27/	MW04/	SND
South Gloucestershire Council	794755/	13/	MW04/	SND
Publication MLP Section 8: the future supply of minerals - Coal (Policy MW05 and supporting text) | Pages 59 to 62				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	28/	MW05/	SND
Aggregate Industries	1164737/	29/	MW05/	SND
Forest of Dean District Council	852145/	9/	MW05/	USND
Forest of Dean District Council	852145/	10/	MW05/	USND
Farmcare Trading Ltd	1038720/	28/	MW05/	SND
Farmcare Trading Ltd	1038720/	29/	MW05/	SND
South Gloucestershire Council	794755/	14/	MW05/	SND
Publication MLP Section 8: the future supply of minerals – Ancillary minerals development (Policy MW06 and supporting text) | Pages 63 to 65				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	30/	MW06/	SND
Aggregate Industries	1164737/	31/	MW06/	SND
Breedon Aggregates	924705/	5/	MW06/	USND
Cotswold Hill Stone Masonry	820738/	4/	MW06/	USND
Cotswold Hill Stone Masonry	820738/	5/	MW06/	USND
Cotswold Stone Quarries	793895/	4/	MW06/	USND
Cotswold Stone Quarries	793895/	5/	MW06/	USND
Elliott & Sons (Cheltenham) Ltd	793547/	3/	MW06/	USND
Elliott & Sons (Cheltenham) Ltd	793547/	4/	MW06/	USND
Hills Quarry Products Ltd	808023/	9/	MW06/	COM
Farmcare Trading Ltd	1038720/	30/	MW06/	SND
Farmcare Trading Ltd	1038720/	31/	MW06/	SND
Smiths (Gloucester) Ltd	802358/	4/	MW06/	USND
South Gloucestershire Council	794755/	15/	MW06/	SND
Stanway Stone	793504/	4/	MW06/	USND
Stanway Stone	793504/	5/	MW06/	USND
Syreford Quarries & Masonry Ltd	794030/	4/	MW06/	USND
Syreford Quarries & Masonry Ltd	794030/	5/	MW06/	USND
Publication MLP Section 9: Areas for future aggregate working (Policy MA01 and supporting text) | Pages 66 to 69				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	32/	MA01/	SND

Aggregate Industries	1164737/	33/	MA01/	SND
Chris McFarling	855353/	18/	MA01/	USND
Elliott & Sons (Cheltenham) Ltd	793547/	5/	MA01/	USND
Environment Agency	1169920/	1/	MA01/	USND
Forest of Dean District Council	852145/	11/	MA01/	USND
Forest of Dean District Council	852145/	12/	MA01/	USND
Hills Quarry Products Ltd	808023/	10/	MA01/	SND
Natural England	1116790/	2/	MA01/	USND
Nicola Packer	1028219/	13/	MA01/	USND
Nicola Packer	1028219/	14/	MA01/	USND
Farmcare Trading Ltd	1038720/	32/	MA01/	SND
Farmcare Trading Ltd	1038720/	33/	MA01/	SND
Smiths (Gloucester) Ltd	802358/	5/	MA01/	USND
South Gloucestershire Council	794755/	16/	MA01/	SND
Tarmac Trading Ltd	794029/	1/	MA01/	USND
Publication MLP Section 9: Areas for future aggregate working (Policy MA02 and supporting text) | Pages 69 to 72				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	34/	MA02/	USND
Aggregate Industries	1164737/	35/	MA02/	USND
Elliott & Sons (Cheltenham) Ltd	793547/	6/	MA02/	USND
Elliott & Sons (Cheltenham) Ltd	793547/	7/	MA02/	USND
Hills Quarry Products Ltd	808023/	11/	MA02/	COM
Hills Quarry Products Ltd	808023/	12/	MA02/	COM
Nicola Packer	1028219/	15/	MA02/	USND
Farmcare Trading Ltd	1038720/	34/	MA02/	SND
Farmcare Trading Ltd	1038720/	35/	MA02/	SND
Smiths (Gloucester) Ltd	802358/	6/	MA02/	USND
Smiths (Gloucester) Ltd	802358/	7/	MA02/	USND
South Gloucestershire Council	794755/	17/	MA02/	SND
Worcestershire County Council	807759/	2/	MA02/	SND
Worcestershire County Council	807759/	3/	MA02/	SND
Publication MLP Section 10: Development Management (Introductory text) | Pages 73 to 76				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	36/	DMT/	SND
Hills Quarry Products Ltd	808023/	13/	DMT/	COM
Farmcare Trading Ltd	1038720/	36/	DMT/	SND

Publication MLP Section 10: Development Management (Policy DM01 (Amenity) and supporting text) | Pages 77 to 83				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	37/	DM01/	SND
Aggregate Industries	1164737/	38/	DM01/	SND
Breedon Aggregates	924705/	6/	DM01/	USND
Breedon Aggregates	924705/	7/	DM01/	USND
Christopher Wilderspin	1042027/	1/	DM01/	USND
Coleford Town Council	802393/	1/	DM01/	USND
Cotswold Hill Stone Masonry	820738/	6/	DM01/	USND
Cotswold Hill Stone Masonry	820738/	7/	DM01/	USND
Cotswold Stone Quarries	793895/	6/	DM01/	USND
Cotswold Stone Quarries	793895/	7/	DM01/	USND
Hills Quarry Products Ltd	808023/	14/	DM01/	USND
Mary Condrad	1033898/	1/	DM01/	USND
Newland Parish Council	802011/	1/	DM01/	USND
Farmcare Trading Ltd	1038720/	37/	DM01/	SND
Farmcare Trading Ltd	1038720/	38/	DM01/	SND
Smiths (Gloucester) Ltd	802358/	8/	DM01/	USND
Smiths (Gloucester) Ltd	802358/	9/	DM01/	USND
South Gloucestershire Council	794755/	18/	DM01/	SND
Stanway Stone	793504/	6/	DM01/	USND
Stanway Stone	793504/	7/	DM01/	USND
Syreford Quarries & Masonry Ltd	794030/	6/	DM01/	USND
Syreford Quarries & Masonry Ltd	794030/	7/	DM01/	USND
Temple Guiting Parish Council	1169771	9/	DM01/	USND
Temple Guiting Parish Council	1169771/	10/	DM01/	USND
West Dean Parish Council	802366/	1/	DM01/	USND
Publication MLP Section 10: Development Management (Policy DM02 (Cumulative Impact) and supporting text) | Pages 84 to 85				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	39/	DM02/	SND
Aggregate Industries	1164737/	40/	DM02/	SND
Cotswold Hill Stone Masonry	820738/	8/	DM02/	USND
Cotswold Stone Quarries	793895/	8/	DM02/	USND
Farmcare Trading Ltd	1038720/	39/	DM02/	SND
Farmcare Trading Ltd	1038720/	40/	DM02/	SND
Smiths (Gloucester) Ltd	802358/	10/	DM02/	USND

South Gloucestershire Council	794755/	19/	DM02/	SND
Stanway Stone	793504/	8/	DM02/	USND
Syreford Quarries & Masonry Ltd	794030/	8/	DM02/	USND
Temple Guiting Parish Council	1169771/	11/	DM02/	COM

Publication MLP Section 10: Development Management (Policy DM03 (Transport) and supporting text) | Pages 86 to 90

Respondent	Representation Reference			
Aggregate Industries	1164737/	41/	DM03/	SND
Aggregate Industries	1164737/	42/	DM03/	SND
Breedon Aggregates	924705/	8/	DM03/	USND
Cotswold Hill Stone Masonry	820738/	9/	DM03/	USND
Cotswold Hill Stone Masonry	820738/	10/	DM03/	USND
Cotswold Stone Quarries	793895/	9/	DM03/	USND
Cotswold Stone Quarries	793895/	10/	DM03/	USND
Forest of Dean District Council	852145/	13/	DM03/	USND
Forest of Dean District Council	852145/	14/	DM03/	COM
Highways England	858234/	2/	DM03/	SND
Hills Quarry Products Ltd	808023/	15/	DM03/	USND
Hills Quarry Products Ltd	808023/	16/	DM03/	COM
Nicola Packer	1028219/	16/	DM03/	USND
Nicola Packer	1028219/	16/	DM03/	USND
Farmcare Trading Ltd	1038720/	41/	DM03/	SND
Farmcare Trading Ltd	1038720/	42/	DM03/	SND
Saleem Shamash	854632/	2/	DM03/	USND
Saleem Shamash	854632/	3/	DM03/	USND
Smiths (Gloucester) Ltd	802358/	11/	DM03/	USND
Smiths (Gloucester) Ltd	802358/	12/	DM03/	USND
South Gloucestershire Council	794755/	20/	DM03/	SND
Stanway Stone	793504/	9/	DM03/	USND
Stanway Stone	793504/	10/	DM03/	USND
Syreford Quarries & Masonry Ltd	794030/	9/	DM03/	USND
Syreford Quarries & Masonry Ltd	794030/	10/	DM03/	USND
Temple Guiting Parish Council	1169771/	12/	DM03/	USND

Publication MLP Section 10: Development Management (Policy DM04 (Flood risk) and supporting text) | Pages 91 to 95

Respondent	Representation Reference			
Aggregate Industries	1164737/	43/	DM04/	SND
Aggregate Industries	1164737/	44/	DM04/	SND
Breedon Aggregates	924705/	9/	DM04/	USND

Cotswold Hill Stone Masonry	820738/	11/	DM04/	USND
Cotswold Stone Quarries	793895/	11/	DM04/	USND
Environment Agency	1169920/	2/	DM04/	USND
Environment Agency	1169920/	3/	DM04/	USND
Forest of Dean District Council	852145/	15/	DM04/	USND
Forest of Dean District Council	852145/	16/	DM04/	COM
Hills Quarry Products Ltd	808023/	17/	DM04/	COM
Farmcare Trading Ltd	1038720/	43/	DM04/	SND
Farmcare Trading Ltd	1038720/	44/	DM04/	SND
Smiths (Gloucester) Ltd	802358/	13/	DM04/	USND
South Gloucestershire Council	794755/	21/	DM04/	SND
Stanway Stone	793504/	11/	DM04/	USND
Syreford Quarries & Masonry Ltd	794030/	11/	DM04/	USND
Publication MLP Section 10: Development Management (Policy DM05 (Water resources) and supporting text) | Pages 96 to 99				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	45/	DM05/	SND
Aggregate Industries	1164737/	46/	DM05/	SND
Chris McFarling	855353/	19/	DM05/	USND
Christopher Wilderspin	1042027/	2/	DM05/	USND
Coleford Town Council	802393/	2/	DM05/	USND
Cotswold Hill Stone Masonry	820738/	12/	DM05/	USND
Cotswold Stone Quarries	793895/	12/	DM05/	USND
Environment Agency	1169920/	4/	DM05/	USND
Environment Agency	1169920/	5/	DM05/	USND
Forest of Dean District Council	852145/	17/	DM05/	USND
Mary Condrad	1033898/	2/	DM05/	USND
Newland Parish Council	802011/	2/	DM05/	USND
Nicola Packer	1028219/	17/	DM05/	USND
Farmcare Trading Ltd	1038720/	45/	DM05/	SND
Farmcare Trading Ltd	1038720/	46/	DM05/	SND
Smiths (Gloucester) Ltd	802358/	14/	DM05/	USND
South Gloucestershire Council	794755/	22/	DM05/	SND
Stanway Stone	793504/	12/	DM05/	USND
Syreford Quarries & Masonry Ltd	794030/	12/	DM05/	USND
Welsh Water	810002/	1/	DM05/	SND
West Dean Parish Council	802366/	2/	DM05/	USND
Publication MLP Section 10: Development Management (Policy DM06 (Biodiversity and geodiversity) and supporting text) | Pages 100 to 106				

Respondent	Representation Reference			
Aggregate Industries	1164737/	47/	DM06/	SND
Aggregate Industries	1164737/	48/	DM06/	SND
Cotswold Hill Stone Masonry	820738/	13/	DM06/	USND
Cotswold Stone Quarries	793895/	13/	DM06/	USND
Forest of Dean District Council	852145/	18/	DM06/	USND
Hills Quarry Products Ltd	808023/	18/	DM06/	USND
Nicola Packer	1028219/	18/	DM06/	USND
Farmcare Trading Ltd	1038720/	47/	DM06/	SND
Farmcare Trading Ltd	1038720/	48/	DM06/	SND
Smiths (Gloucester) Ltd	802358/	15/	DM06/	USND
South Gloucestershire Council	794755/	23/	DM06/	SND
Stanway Stone	793504/	13/	DM06/	USND
Syreford Quarries & Masonry Ltd	794030/	13/	DM06/	USND
Publication MLP Section 10: Development Management (Policy DM07 (Soil resources) and supporting text) | Pages 108 to 110				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	49	DM07/	SND
Aggregate Industries	1164737/	50/	DM07/	SND
Breedon Aggregates	924705/	10/	DM07/	USND
Forest of Dean District Council	852145/	19/	DM07/	USND
Hills Quarry Products Ltd	808023/	19/	DM07/	COM
Farmcare Trading Ltd	1038720/	49/	DM07/	SND
Farmcare Trading Ltd	1038720/	50/	DM07/	SND
South Gloucestershire Council	794755/	24/	DM07/	SND
Publication MLP Section 10: Development Management (Policy DM08 (Historic environment) and supporting text) | Pages 111 to 114				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	51/	DM08/	SND
Aggregate Industries	1164737/	52/	DM08/	SND
Breedon Aggregates	924705/	11/	DM08/	USND
Cotswold Hill Stone Masonry	820738/	14/	DM08/	USND
Cotswold Hill Stone Masonry	820738/	15/	DM08/	USND
Cotswold Stone Quarries	793895/	14/	DM08/	USND
Cotswold Stone Quarries	793895/	15/	DM08/	USND
Forest of Dean District Council	852145/	20/	DM08/	USND
Forest of Dean District Council	852145/	21/	DM08/	COM
Hills Quarry Products Ltd	808023/	20/	DM08/	USND

Hills Quarry Products Ltd	808023/	21/	DM08/	USND
Farmcare Trading Ltd	1038720/	51/	DM08/	SND
Farmcare Trading Ltd	1038720/	52/	DM08/	SND
Historic England	793641/	2/	DM08/	COM
Smiths (Gloucester) Ltd	802358/	16/	DM08/	USND
Smiths (Gloucester) Ltd	802358/	17/	DM08/	USND
South Gloucestershire Council	794755/	25/	DM08/	SND
Stanway Stone	793504/	14/	DM08/	USND
Stanway Stone	793504/	15/	DM08/	USND
Syreford Quarries & Masonry Ltd	794030/	14/	DM08/	USND
Syreford Quarries & Masonry Ltd	794030/	15/	DM08/	USND
Publication MLP Section 10: Development Management (Policy DM09 (Landscape) and supporting text) | Pages 115 to 120				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	53/	DM09/	SND
Aggregate Industries	1164737/	54/	DM09/	SND
Breedon Aggregates	924705/	12/	DM09/	USND
Christopher Wilderspin	1042027/	3/	DM09/	USND
Clearwell Mine Management Ltd	847014/	1/	DM09/	USND
Coleford Town Council	802393/	3/	DM09/	USND
Coleford Town Council	802393/	3/	DM09/	USND
Cotswold Hill Stone Masonry	820738/	16/	DM09/	USND
Cotswold Stone Quarries	793895/	16/	DM09/	USND
Forest of Dean District Council	852145/	22/	DM09/	USND
Hills Quarry Products Ltd	808023/	22/	DM09/	USND
Hills Quarry Products Ltd	808023/	23/	DM09/	USND
Mary Condrad	1033898/	3/	DM09/	USND
Newland Parish Council	802011/	3/	DM09/	USND
Northcot Brick Ltd	794035/	5/	DM09/	SND
Farmcare Trading Ltd	1038720/	53/	DM09/	SND
Farmcare Trading Ltd	1038720/	54/	DM09/	SND
Smiths (Gloucester) Ltd	802358/	18/	DM09/	USND
South Gloucestershire Council	794755/	26/	DM09/	SND
Stanway Stone	793504/	16/	DM09/	USND
Syreford Quarries & Masonry Ltd	794030/	16/	DM09/	USND
Temple Guiting Parish Council	1169771/	13/	DM09/	USND
West Dean Parish Council	802366/	3/	DM09/	USND
Publication MLP Section 10: Development Management (Policy DM10 (Green belt) and supporting text) | Pages 121 to 123				

Respondent	Representation Reference			
Aggregate Industries	1164737/	55/	DM10/	SND
Aggregate Industries	1164737/	56/	DM10/	SND
Elliott & Sons (Cheltenham) Ltd	793547/	8/	DM10/	USND
Elliott & Sons (Cheltenham) Ltd	793547/	9/	DM10/	USND
Hills Quarry Products Ltd	808023/	24/	DM10/	COM
Farmcare Trading Ltd	1038720/	55/	DM10/	SND
Farmcare Trading Ltd	1038720/	56/	DM10/	SND
Smiths (Gloucester) Ltd	802358/	19/	DM10/	USND
Smiths (Gloucester) Ltd	802358/	20/	DM10/	USND
South Gloucestershire Council	794755/	27/	DM10/	SND

Publication MLP Section 10: Development Management (Policy DM11 (Aerodrome safeguarding and aviation safety) and supporting text) | Pages 124 to 125

Respondent	Representation Reference			
Aggregate Industries	1164737/	57/	DM11/	SND
Aggregate Industries	1164737/	58/	DM11/	SND
Farmcare Trading Ltd	1038720/	57/	DM11/	SND
Farmcare Trading Ltd	1038720/	58/	DM11/	SND
South Gloucestershire Council	794755/	28/	DM11/	SND

Publication MLP Section 11: Mineral restoration (Policy MR01 and supporting text) | Pages 126 to 133

Respondent	Representation Reference			
Aggregate Industries	1164737/	59/	MR01/	SND
Aggregate Industries	1164737/	60/	MR01/	SND
Breedon Aggregates	924705/	13/	MR01/	USND
Cotswold Hill Stone Masonry	820738/	17/	MR01/	COM
Cotswold Hill Stone Masonry	820738/	18/	MR01/	USND
Cotswold Stone Quarries	793895/	17/	MR01/	COM
Cotswold Stone Quarries	793895/	18/	MR01/	USND
Defence Infrastructure Organisation	801951/	1/	MR01/	COM
Elliott & Sons (Cheltenham) Ltd	793547/	10/	MR01/	USND
Forest of Dean District Council	852145/	23/	MR01/	USND
Hills Quarry Products Ltd	808023/	25/	MR01/	COM
Hills Quarry Products Ltd	808023/	26/	MR01/	USND
Cotswold Canal Trust	1029955/	1/	MR01/	COM
Farmcare Trading Ltd	1038720/	59/	MR01/	SND
Farmcare Trading Ltd	1038720/	60/	MR01/	SND
Smiths (Gloucester) Ltd	802358/	21/	MR01/	COM

Smiths (Gloucester) Ltd	802358/	22/	MR01/	USND
South Gloucestershire Council	794755/	29/	MR01/	SND
Stanway Stone	793504/	17/	MR01/	COM
Stanway Stone	793504/	18/	MR01/	USND
Syreford Quarries & Masonry Ltd	794030/	17/	MR01/	COM
Syreford Quarries & Masonry Ltd	794030/	18/	MR01/	USND
Temple Guiting Parish Council	1169771/	14/	MR01/	USND
Temple Guiting Parish Council	1169771/	15/	MR01/	USND
Publication MLP Section 12: Managing and monitoring plan delivery (including Monitoring Schedule) | Pages 134 to 140				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	61/	MON/	SND
Farmcare Trading Ltd	1038720/	61/	MON/	SND
Historic England	793641/	3/	MON/	COM
South Gloucestershire Council	794755/	30/	MON/	SND
Temple Guiting Parish Council	1169771/	16/	MON/	SND
Publication MLP Appendix 1: Key Diagram | Page 141				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	62/	KDI/	SND
Farmcare Trading Ltd	1038720/	62/	KDI/	SND
Publication MLP Appendix 2: Safeguarded mineral infrastructure sites| Page 142				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	63/	SMI/	SND
Breedon Aggregates	924705/	14/	SMI/	COM
Elliott & Sons (Cheltenham) Ltd	793547/	11/	SMI/	COM
Hills Quarry Products Ltd	808023/	27/	SMI/	COM
Farmcare Trading Ltd	1038720/	63/	SMI/	SND
Publication MLP Appendix 3: Forecast of aggregate supplies and provision figures | Page 143				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	64/	AGS/	SND
Hills Quarry Products Ltd	808023/	28/	AGS/	COM
Nicola Packer	1028219/	19/	AGS/	USND
Farmcare Trading Ltd	1038720/	64/	AGS/	SND
Publication MLP Appendix 4: Detailed development requirements for plan allocations (Allocation 01: Land east of Stowe Hill Quarry) | Pages 145 to 150				

Respondent	Representation Reference			
Aggregate Industries	1164737/	65/	AL01/	SND
Breedon Aggregates	924705/	15/	AL01/	USND
Defence Infrastructure Organisation	801951/	2/	AL01/	SND
Environment Agency	1169920/	6/	AL01/	USND
Forest of Dean District Council	852145/	24/	AL01/	USND
Heather James	1169539/	2/	AL01/	USND
John James	855340/	3/	AL01/	USND
Natural England	1116790/	3/	AL01/	USND
Nicola Packer	1028219/	20/	AL01/	USND
Farmcare Trading Ltd	1038720/	65/	AL01/	SND
Historic England	793641/	4/	AL01/	COM
Welsh Water	810002/	2/	AL01/	COM
Publication MLP Appendix 4: Detailed development requirements for plan allocations (Allocation 02: Land west of Drybrook Quarry) | Pages 151 to 155				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	66/	AL02/	SND
Defence Infrastructure Organisation	801951/	3/	AL02/	SND
Environment Agency	1169920/	7/	AL02/	COM
Forest of Dean District Council	852145/	25/	AL02/	SND
Farmcare Trading Ltd	1038720/	66/	AL02/	SND
Welsh Water	810002/	3/	AL02/	COM
Publication MLP Appendix 4: Detailed development requirements for plan allocations (Allocation 03: Depth extension to Stowfield Quarry) | Pages 156 to 160				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	67/	AL03/	SND
Defence Infrastructure Organisation	801951/	4/	AL03/	SND
Environment Agency	1169920/	8/	AL03/	COM
Forest of Dean District Council	852145/	26/	AL03/	SND
Farmcare Trading Ltd	1038720/	67/	AL03/	SND
Welsh Water	810002/	4/	AL03/	COM
Publication MLP Appendix 4: Detailed development requirements for plan allocations (Allocation 04: Land northwest of Daglingworth Quarry) | Pages 161 to 166				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	68/	AL04/	SND
Defence Infrastructure Organisation	801951/	5/	AL04/	SND
Environment Agency	1169920/	9/	AL04/	COM
Highways England	858234/	3/	AL04/	SND

Michael Carr	1164090/	21/	AL04/	USND
Farmcare Trading Ltd	1038720/	68/	AL04/	SND
Historic England	793641/	5/	AL04/	COM
Publication MLP Appendix 4: Detailed development requirements for plan allocations (Allocation 05: Land south and west of Naunton Quarry) | Pages 167 to 172				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	69/	AL05/	SND
Defence Infrastructure Organisation	801951/	6/	AL05/	SND
Environment Agency	1169920/	10/	AL05/	COM
Highways England	858234/	4/	AL05/	SND
Farmcare Trading Ltd	1038720/	69/	AL05/	SND
Temple Guiting Parish Council	1169771/	17/	AL05/	SND
Publication MLP Appendix 4: Detailed development requirements for plan allocations (Allocation 06: Land south east of Down Ampney) | Pages 173 to 178				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	70/	AL06/	SND
Defence Infrastructure Organisation	801951/	7/	AL06/	USND
Environment Agency	1169920/	11/	AL06/	USND
Gemma Ormond	852999/	1/	AL06/	USND
Highways England	858234/	5/	AL06/	SND
Hills Quarry Products Ltd	808023/	29/	AL06/	SND
Farmcare Trading Ltd	1038720/	70/	AL06/	SND
Historic England	793641/	6/	AL06/	COM
Saleem Shamash	854632/	4/	AL06/	USND
Publication MLP Appendix 4: Detailed development requirements for plan allocations (Allocation 07: Land at Lady Lamb Farm, west of Fairford) | Pages 179 to 184				
Respondent	**Representation Reference**			
Aggregate Industries	1164737/	71/	AL07/	SND
Defence Infrastructure Organisation	801951/	8/	AL07/	USND
Environment Agency	1169920/	12/	AL07/	COM
Highways England	858234/	6/	AL07/	SND
Farmcare Trading Ltd	1038720/	71/	AL07/	SND
Publication MLP: General comments				
Respondent	**Representation Reference**			
Cotswold District Council	852905/	1/	OTH/	COM
Gemma Ormond	852999/	2/	OTH/	COM
Maxine Smillie	1034555/	1/	OTH/	COM

National Grid Plant Protection	803161/	1/	OTH/	COM
Northcot Brick Ltd	794035/	6/	OTH/	COM
Farmcare Trading Ltd	1038720/	72/	OTH/	COM
Historic England	793641/	7/	OTH/	COM
Temple Guiting Parish Council	1169771/	18/	OTH/	COM
Welsh Water Ltd	810002/	5/	OTH/	COM

Matters related to the Duty to Co-operate

Publication MLP Consultation Questionnaire Reference | Questions 2.1, 2.2

Representation Reference	Full Name	Organisation Details	Do you consider that the Duty to Co-operate has been met?	Please give details in the box below of why you consider the Duty-to-Co-operate has not been met. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
854632/1/DTC/NLEG	Mr Saleem Shamash		No	The access road that will be used by Allocation No 6 that runs to the A417 crosses in and out of Gloucestershire and Wiltshire. Corresponding allocations in Wiltshire carry, after my intervention on their Mineral Local Plan, the requirement to impose if necessary wear and tear obligations. Those obligations should obviously apply to the whole road regardless of administrative boundaries. Proper co-operation with Wiltshire would have identified this and led to a consistent approach and one which has already been endorsed by a Planning Inspector.	It is the view of the MPA that the requirements of the Duty-to-Cooperate have been met. Evidence set out in the Interim Duty-to-Cooperate (DtC) Statement, which accompanied the Publication MLP, shows how Gloucestershire County Council has actively; constructively; meaningfully and in a continuous fashion, engaged with local authorities and other prescribed bodies that share strategic planning matters. This has incorporated Wiltshire Council on a number of counts, including future possible cross-border highway impacts associated with minerals development. The outcome of collaborative working has resulted in a specific local policy requirement being presented in the Publication MLP under Allocation 06. This requests applicant's to seek the advice of the Wiltshire Council in its capacity as the Local Highways Authority and to take account of the Wiltshire Local Transport Plan Freight Strategy, when deciding upon how to tackle highway matters (e.g. access onto the A419).	No modifications are considered necessary in response to the representation.
852145/1/DTC/LEG	Mr Nigel Gibbons	Forest of Dean District Council	Yes		The representation, which considers that the Duty to Co-operate has been met, is noted.	No modifications are considered necessary in response to the representation.
1164737/1/DTC/LEG	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes	Not applicable.	The representation, which considers that the Duty to Co-operate has been met, is noted.	No modifications are considered necessary in response to the representation.
801907/1/DTC/NLEG	Mr B Brown	Campaign For The Protection Of Rural England (Gloucestershire - Minerals)	No	Not Effective Not consistent with national policy CPRE has raised concern over Gloucestershire County Council's (GCC's) implementation of the Duty to Co-operate	It is the view of the MPA that the requirements of the Duty-to-Cooperate have been met. Evidence set out in the Interim Duty-to-Cooperate (DtC)	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Duty to Co-operate has been met?	Please give details in the box below of why you consider the Duty-to-Co-operate has not been met. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
				(DtC) in previous public consultations on the evolving Minerals Local Plan (MLP). There are 3 different types of aggregates identified in the MLP. With reference to sand and gravel, although effective implementation of the DtC is important, CPRE does not see it being likely to result in a different allocation for preferred areas or areas of search. That is because there is a general issue of scarce resources in adjacent authorities as well as in Gloucestershire. GCC has differentiated between 2 types of crushed rock – Carboniferous and Jurassic – and has worked on a '70/30 split' between the county's separate areas of production – Forest of Dean (FoD) and Cotswolds. CPRE acknowledges the appropriateness of the distinction, given the very different characteristics of the rock types and the resultant range of uses. The Jurassic limestone resource is located in the Cotswolds AONB, working of which is generally undesirable in protected landscapes, as indicated in national planning policy. However, there appear to be options which amply meet the MLP's needs and which CPRE accepts would not result in unacceptable levels of additional harm to the environment – given the existing quarry operations. The situation regarding Carboniferous limestone is different. In the 'South West' there is major production in Somerset, North Somerset Unitary Authority (UA) and South Gloucestershire UA as well as in Gloucestershire. It has long been recognised that finding significant further resources in the FoD which could be exploited without major environmental damage is problematic. Most of the potentially exploitable rock lies either within the Wye Valley AONB or so close to it as to be likely to adversely affect the setting of the designated area. The extension to Stowe Hill Quarry, which is indicated to potentially supply the largest part of the calculated 'need', has severe adverse implications for landscape and local amenity and, we understand, a risk to the rare hydrogeological features of the Slade Brook SSSI. Despite this, paragraph 230	Statement, which accompanied the Publication MLP, shows how Gloucestershire County Council has actively; constructively; meaningfully and in a continuous fashion, engaged with local authorities and other prescribed bodies that share strategic planning matters. In respect of the strategic nature of mineral supplies affecting Gloucestershire, the MPA has formally and informally invited other MPAs that have a supply relationship to jointly prepare a memorandum of understanding relating to joint strategic issues. There is currently no evidence to suggest a strategic supply relationship between Gloucestershire and Somerset. The appropriateness of Allocation 01 is a separate issue to Duty to Co-operate and is discussed under the responses to Publication LP Questionnaire Questions 66.1-66.5. The combination of two or more landbanks is common practice for reasons of commercial confidentiality. The 70/30 split has remained fairly consistent and the production from the Forest of Dean has never been more than 75% or less than 65%. It is not accepted that DtC engagements have not influenced the plan's preparation. The DtC meetings have influenced both plan preparation and the LAA. The LAA is a significant influencing factor on the plan's preparation, particularly with regards to understanding the supply and demand patterns between Gloucestershire and other MPA areas. These patterns have helped identify which	

Representation Reference	Full Name	Organisation Details	Do you consider that the Duty to Co-operate has been met?	Please give details in the box below of why you consider the Duty-to-Co-operate has not been met. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
				says 'It is expected that all Preferred Areas will have a reasonable prospect of coming forward during the plan period. If Stowe Hill were not to be approved then there are no other credible options to fill the 'gap'. Under the pre. 2010 national minerals planning policy (MPS1 etc), regional apportionments for aggregates production were made by central Government and sub-apportionment to mineral planning authorities (MPAs) within the region was delegated to the regional authority. Prior to the dissolution of regional authorities the particular problems of environmental constraints in the FoD had been recognised and were being addressed in the latest sub-regional apportionment. The sub-regional apportionment process has now been replaced by the DtC. GCC's Interim Duty to Cooperate Statement (May 2018), which accompanies the draft MLP, records an extensive list of contacts with other relevant organisations. However, in terms of 'outcomes', most are merely recorded as improving knowledge and awareness. None are shown to have influenced the formulation of the draft MLP. We comment specifically on 2 of the recorded meetings. The outcome of a meeting with South Gloucestershire and North Somerset UAs in June 2013 is recorded as 'Confirmation that formal joint policy making at this time would not be realistic due to divergent plan-making timetables'. Whilst CPRE appreciates the practical difficulties, plan making of different authorities is rarely, if ever, 'convergent'. For that to be recorded as justifying not jointly assessing the options, in quantitative terms, seems to make a mockery of the national directive. The outcome of a meeting with the same 2 UAs in February 2015 says 'Understanding of plan preparation (covering minerals) timetables across partner authorities and increased knowledge of current and future factors affecting trends with cross-border crushed rock aggregate supplies'. That is highly relevant, but nothing material appears to have come from it in actually assessing demand and supply. Although the 6th LAA for Gloucestershire provides	authorities Gloucestershire has a strategic supply issue with and some of the strategic issues discussed through DtC.	

Representation Reference	Full Name	Organisation Details	Do you consider that the Duty to Co-operate has been met?	Please give details in the box below of why you consider the Duty-to-Co-operate has not been met. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
				useful information on sales, and on export and import of crushed rock, it does not differentiate between Carboniferous and Jurassic rock (despite the MLP applying the 70/30 split). Para 4.16 of the LAA states 'In previous years it has been possible to publish annual monitoring data relating to [the] separate crushed rock landbanks. However, due to the decline in the number of working sites and distribution of independent operators, this cannot be done due to reasons of commercial confidentiality.' Whatever the case for commercial confidentiality, this places CPRE at a disadvantage when trying to analyse the sales/export/import of Carboniferous limestone in respect of Gloucestershire. Basic geography indicates how closely the demand and supply situations in Gloucestershire and South Gloucestershire are aligned. Markets for aggregates are not influenced by local authority boundaries, but by economics. The South Gloucestershire crushed rock quarries are at least as well located to supply the main demand areas of Gloucestershire as those in the FoD. (Until recently the major quarry at Tytherington was moth-balled for a considerable time, presumably because of lack of demand). CPRE acknowledges that the Bristol urban area is likely to be a major source of demand for South Gloucestershire and North Somerset quarries, though the urban area is also within reasonable distance of Carboniferous limestone quarries in Somerset. CPRE does not contend that other MPAs can or should automatically 'bail out' Gloucestershire with regard to demand for Carboniferous limestone aggregate. There are clearly demands from other areas which have to be considered. However, given the acute environmental and infrastructure constraints which apply to future site options in the FoD rock resource area, there should be available evidence that there has been a serious attempt to analyse and quantify the demand and supply options with relevant MPAs. That is especially applicable to South		

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				Gloucestershire which has such close transport links and, prima facie, has an existing substantial landbank which is well in excess of current needs based on its latest LAA. At this stage any change has major implications. Probably the least disruptive option would be to remove the preferred area designations in the FoD, at least from the Stowe Hill site, and to make necessary amendments to the text in related policies. That would not preclude applications being made to work those areas, but, as CPRE understands the situation, statutory consultees have indicated that several years of additional monitoring data are needed to assess the hydrogeological risks at Stowe Hill. The MLP could have a statement to the effect that every effort would be made to carry out a joint analysis of demand and supply options on the lines proposed above - under the DtC - and that the outcome would be reflected in the 1st review of the Gloucestershire MLP.		
1169539/1/DTC/NLEG	Mrs Heather James		No	Not positively prepared Not Effective Re: Stowe Hill Quarry, Clearwell Evidence is not demonstrated of exploration of reasonable alternatives and attempts to liaise with for example Somerset County Council for the supplying of crushed rock. There is a duty to cooperate and Somerset indicates reserves exceeding their requirements. Take Stowe Hill quarry out of the plan and obtain further supplies from Somerset.	It is the view of the MPA that the requirements of the Duty-to-Cooperate have been met. Evidence set out in the Interim Duty-to-Cooperate (DtC) Statement, which accompanied the Publication MLP, shows how Gloucestershire County Council has actively; constructively; meaningfully and in a continuous fashion, engaged with local authorities and other prescribed bodies that share strategic planning matters. In respect of the strategic nature of mineral supplies affecting Gloucestershire, the MPA has formally and informally invited other MPAs that have a supply relationship to jointly prepare a memorandum of understanding relating to joint strategic issues. There is currently no evidence to suggest a strategic supply relationship between	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Duty to Co-operate has been met?	Please give details in the box below of why you consider the Duty-to-Co-operate has not been met. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
					Gloucestershire and Somerset.	
1169771/1/DTC/LEG	Mr Michael Krier	Chairman Temple Guiting Parish Council	Yes		The representation, which considers that the Duty to Co-operate has been met, is noted.	
794755/1/DTC/LEG	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council		Officers concur with the County Council's assertion that, through the process of MLP preparation, the requirements of the Duty to Cooperate have been met in relation to South Gloucestershire Council. Officers consider that the Council has been actively and meaningfully engaged throughout plan preparation – both specifically in its role as a neighbouring MPA, and also through working to prepare a memorandum of understanding between the County Council and the four West of England Unitary authorities (covering the Mayoral Combined Authority area). Officers also note the engagement which has taken place between the councils through their involvement in the South West Aggregates Working Party (SWAWP) and in doing so, in preparing their respective LAAs. The opportunity for further cross-boundary working on an ongoing basis, through the process of preparing the new South Gloucestershire Local Plan is noted, and officers look forward to continuing the relationship with colleagues at the County Council.	The representation, which considers that the Duty to Co-operate has been met, is noted.	
1164090/1/DTC/LEG	Mr Michael Carr		Yes		The representation, which considers that the Duty to Co-operate has been met, is noted.	No modifications are considered necessary in response to the representation.
1028219/1/DTC/NLEG	Ms Nicola Packer		No	The plan does not recognise that the need for materials quarried at Stowe Hill could be met outside the Forest of Dean on less ecologically sensitive sites. The Tufa Dams stream is an unique habitat and is threatened by Stowe Hill. Unlike Cotswold Stone needed to repair old buildings in Conservation areas, there is no specific quality of the stone quarried at Stowe Hill that cannot be provided elsewhere.	It is the view of the MPA that the requirements of the Duty-to-Cooperate have been met. Evidence set out in the Interim Duty-to-Cooperate (DtC) Statement, which accompanied the Publication MLP, shows how Gloucestershire County Council has actively; constructively; meaningfully and in a continuous fashion, engaged with local authorities and other prescribed bodies that share strategic planning matters. In respect of the strategic nature of mineral	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Duty to Co-operate has been met?	Please give details in the box below of why you consider the Duty-to-Co-operate has not been met. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
					supplies affecting Gloucestershire, the MPA has formally and informally invited other MPAs that have a supply relationship to jointly prepare a memorandum of understanding relating to joint strategic issues.	
855340/1/DTC/NLEG	Mr John James		No	Not effective Regarding Stowe Hill Quarry Evidence of meetings with various authorities does not show any attempt to engage Somerset CC in supplying extra crushed rock aggregate to offset a reduction in aggregate to be produced in Gloucestershire, although there were meetings regarding sand and gravel (Feb 18) Somerset have indicated reserves well exceeding their requirements. Exclusion of Stowe Hill Quarry area from the plan with a further supply obtained from Somerset.	It is the view of the MPA that the requirements of the Duty-to-Cooperate have been met. Evidence set out in the Interim Duty-to-Cooperate (DtC) Statement, which accompanied the Publication MLP, shows how Gloucestershire County Council has actively; constructively; meaningfully and in a continuous fashion, engaged with local authorities and other prescribed bodies that share strategic planning matters. In respect of the strategic nature of mineral supplies affecting Gloucestershire, the MPA has formally and informally invited other MPAs that have a supply relationship to jointly prepare a memorandum of understanding relating to joint strategic issues. There is currently no evidence to suggest a strategic supply relationship between Gloucestershire and Somerset.	No modifications are considered necessary in response to the representation.
855353/1/DTC/NLEG	Chris McFarling		No	The duty to cooperate with other neighbouring counties and authorities has not been fully exercised. Since minerals export and import cross authority boundaries, and the need to use the most cost effective, and environmentally considerate means of meeting our 'national' needs is met, the duty to cooperate must be exercised more fully and holistically.	It is the view of the MPA that the requirements of the Duty-to-Cooperate have been met. Evidence set out in the Interim Duty-to-Cooperate (DtC) Statement, which accompanied the Publication MLP, shows how Gloucestershire County Council has actively; constructively; meaningfully and in a continuous fashion, engaged with local authorities and other prescribed bodies that share strategic planning matters. In respect of the strategic nature of mineral supplies affecting	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Duty to Co-operate has been met?	Please give details in the box below of why you consider the Duty-to-Co-operate has not been met. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
					Gloucestershire, the MPA has formally and informally invited other MPAs that have a supply relationship to jointly prepare a memorandum of understanding relating to joint strategic issues.	
1038720/1/DTC/LEG	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.

Matters related to the Sustainability Appraisal

Publication MLP Consultation Questionnaire Reference | Questions 3.1, 3.2, 3.3

Representation Reference	Full Name	Organisation Details	Do you consider that the Sustainability Appraisal is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164090/2/SA/LEG	Mr Michael Carr		Yes			The representation, which considers this matter to be 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1028219/2/SA/NLEG	Ms Nicola Packer		No	Natural England does not have the capacity, due to Government cutbacks to monitor the effects of quarrying. The plan must recognise this and not rely on monitoring by Natural England. It is wrong for the private company doing the quarrying to monitor the effects of quarrying. Quarrying should not be allowed where there is a reasonable risk of environmental damage from quarrying.	Stowe Hill quarry should be excluded from the plan.	Natural England is the statutory undertaker responsible for the protection of certain types of designated assets such as SSSIs. The plan does not have any jurisdiction to assume otherwise. The appropriateness of the Stowe Hill allocation is discussed under the relevant questionnaire questions (66.1-66.5). GCC as MPA is the competent authority responsible for the preparation of the Sustainability Appraisal. Since 2014, this has been undertaken by independent qualified consultants on GCC's behalf. Natural England is consulted along with other consultees but are not responsible for carrying out the assessment process. Natural England have had a continuing dialogue with GCC on the formation of the MLP.	No modifications are considered necessary in response to the representation.
855340/2/SA/NLEG	Mr John James		No	Not effective Complies with either legal/procedural requirements for preparing a development plan - yes In respect of Stowe Hill	No extraction at Stowe Hill quarry. Protection of adjacent residents at sites to be increased to at least 200m.	Whilst the comment that the sustainability appraisal is not legally compliant is noted, it is not accepted. The representation does acknowledge that the	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Sustainability Appraisal is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
				quarry - The plan does not adequately address the health problems for surrounding populations which would result from further quarrying at Stowe Hill quarry. There are three centres of population within 1/2 mile of the area proposed. Whilst dust at crushing plants etc. may be containe the dust caused by extraction cannot. A separation distance to local resident of only 100m is proposed although industry norms imposed by other authorities is of the order of 200m - 250m.		sustainability appraisal does comply with legal/procedural requirements for preparing a plan. The inclusion of Allocation 01 does not affect the legal compliance of the SA. The appropriateness of Allocation 01 is discussed in the responses to questionnaire questions 68.1to 68.5.	
855353/2/SA/NLEG	Chris McFarling		No	Allocation 01: Land East of Stowe Hill Quarry Water resources DM06 Natural england and the Environment Agency have objected to both planning applications on the basis of irreversible harm to the Slade Brook SSSI, an irreplaceable and unique geodiversity feature of national importance. The MLP states that DM06 Biodiversity & Geodiversity: Potential adverse impacts on natural environment assets must be avoided or satisfactorily mitigated in line with Gloucestershire Local Nature Partnership objectives. In exceptional circumstances, where an impact cannot be avoided or mitigated, then compensatory measures	Removing the allocation at Stowe Hill completely from the plan.	Whilst the comment that the sustainability appraisal is not legally compliant is noted, it is not accepted. The inclusion of Allocation 01 does not affect the legal compliance of the SA. The appropriateness of Allocation 01 is discussed in the responses to questionnaire questions 68.1to 68.5.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Sustainability Appraisal is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
				including the use of biodiversity and / or geodiversity offsets will be considered as a means to provide an overall net gain. The public interest in protecting unique natural features of geodiversity exceeds that of mitigation and offsetting the irreversible harm effected by continued quarrying anywhere within this site.			
1038720/2/SA/LEG	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes			The representation, which considers this matter to be 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
849901/1/SA/LEG	Mr Andrew Scarth		Yes	In DM02 - Cumulative Impact (paragraph 292) it states "It may also arise from intensified development generally across a locality, which can extend beyond the administrative area of Gloucestershire" On page 417 (Allocation 06 – Land south east of Down Ampney) of the Sustainability Appraisal including Strategic Environmental Assessment it states in SA Objective 2 " As the nearby settlements and properties are not within 1km of any other existing mineral sites, there are no cumulative effects expected on the local community." This is incorrect as can be seen on the map on page 73 of the MLP. There is a mineral site allocation to the north of Latton (in		The representation, which considers this matter to be 'legally compliant', is noted. At this point in time it is understood that no permission has been granted on the Wiltshire site allocation in Latton. It is not known at what point in the future an application may come forward on the site. It would be expected that the HIA would take consideration of all existing mineral sites and if permission had been granted at Latton (or any other relevant location currently unrecognised within the supporting evidence) then those permissions would be considered as part of the process.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Sustainability Appraisal is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant. It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
				Wiltshire) that is within 1km of the settlement of Down Ampney.I would expect that the HIA will take this into account and not ignore it because of the inaccuracy of one of the supporting documents.			
852145/2/SA/LEG	Mr Nigel Gibbons	Forest of Dean District Council	Yes			The representation, which considers this matter to be 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1164737/2/SA/LEG	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1169771/2/SA/LEG	Mr Michael Krier	Chairman Temple Guiting Parish Council	Yes			The representation, which considers this matter to be 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
794755/2/SA/LEG	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes	Officers note that Sustainability Appraisal (SA) reports have been prepared and used to inform the stages of plan preparation, and consider that in doing so, reasonable alternatives have been assessed.		The representation, which considers this matter to be 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Matters related to the Habitats Regulations Assessment

Publication MLP Consultation Questionnaire Reference | Questions 4.1, 4.2, 4.3

Representation Reference	Full Name	Organisation Details	Do you consider that the Habitats Regulations Assessment is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1028219/3/HRA/NLEG	Ms Nicola Packer		No	The HRA process can no longer be relied upon because Natural England have been too depleted in staff to deal with their workload.	Mineral development proposals which, alone or in combination with other plans and projects, are likely to have a significant effect on any Internationally Important Site designated as a Special Area of Conservation (SAC), Special Protection Area (SPA) or Ramsar site should not be permitted	GCC as MPA is the competent authority and completes the HRA. Natural England is consulted to see if they agree with its conclusion, which in this case is 'not to carry out an appropriate assessment process'. Natural England staff have had a continuing dialogue with GCC on the HRA as it has been developed.	No modifications are considered necessary in response to the representation.
855353/3/HRA/LEG	Chris McFarling		Yes		Highlight the use of the precautionary principle in cases where the evidence is unavailable or insufficient to prove the amount of potential harm resulting from minerals extraction.	The precautionary principle would apply in considering any minerals development that might have a likely significant effect on European Sites. The precautionary principle is embedded in the HRA process for planning applications, which is covered in Policy DM06 and the precautionary principle is also set out within Table 3 of the MLP.	No modifications are considered necessary in response to the representation.
1038720/3/HRA/LEG	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes			The representation, which considers this matter to be 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1164090/3/HRA/LEG	Mr Michael Carr		Yes			The representation, which considers this matter to be 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
852145/3/HRA/LEG	Mr Nigel Gibbons	Forest of Dean District Council	Yes			The representation, which considers this matter to be 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Habitats Regulations Assessment is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/3/HRA/LEG	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1169771/3/HRA/LEG	Mr Michael Krier	Chairman Temple Guiting Parish Council	Yes			The representation, which considers this matter to be 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1116790/1/HRA/COM	Respondent	Senior Advisor - Sustainable Development Natural England		On a further note, we would like to make the Local Authority aware of the following: Notwithstanding the above, your authority should be aware of a ruling made recently by the Court of Justice of the European Union (the CJEU) on the interpretation of the Habitats Directive in the case of People Over Wind and Sweetman vs Coillte Teoranta. read the case (Ref C-323/17) The case relates to the treatment of mitigation measures at the screening stage of a HRA when deciding whether an appropriate assessment of a plan/project is required. Competent authorities currently making HRAs should be mindful of this case and should seek their own legal advice on any implications of this recent ruling for their decisions.		The comment has been noted. The MPA is fully aware of this recent CJEU ruling and its implications. The HRA has been carefully checked in respect of this recent ruling and all other rulings. It is still considered that the HRA for the MLP is legally compliant. In summary the MLP if adopted would not have a likely significant effect on any European Site or could adversely affect the integrity of any SAC, SPA or Ramsar site. A statement has been prepared and will be submitted alongside the plan as supporting evidence for the examination.	**No modifications are considered necessary to the plan in response to the representation.** **However, an additional supporting statement will be submitted at Submission stage, which could result in some minor alterations to the HRA document.**

Matters related to the Proposals Map

Publication MLP Consultation Questionnaire Reference | Question 5.1, 5.2, 5.3, 5.4, 5.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Proposals Map is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Proposals Map is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164090/4/PMP/SND	Mr Michael Carr		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1028219/4/PMP/USND	Ms Nicola Packer		No	(4) Not consistent with national policy	No	It conflicts with National Planning Policy Framework.	NPPF: 'In preparing Local Plans, local planning authorities should:so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously.' The contribution of other materials has been set very low and the action to extract this contribution will not be effective.	It is the view of the MPA that the Proposals (Policies) Map fully accords with national policy and guidance and is legally compliant. It illustrates geographically all of the land-use designations relevant to the policies that are contained in the Publication MLP. The MPA acknowledges that any plan modifications may result in changes to the map to ensure it is reflective of the final adopted MLP. The particular matter raised has been considered under Publication MLP Policies SR01 and MW01.	No modifications are considered necessary in response to the representation.
855353/4/PMP/USND	Chris McFarling		No	(2) Not justified	No	Continued inclusion of Allocation 01 Stowe Hill Quarry conflicts with NPPF 118 which states that	Removal of Allocation 01 from the plan (and ideally all future plans) until the public interest in	It is the view of the MPA that the Proposals (Policies) Map fully accords with national policy	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Proposals Map is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Proposals Map is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						"if significant harm … cannot be avoided, adequately mitigated or … compensated for, then planning permission should be refused".	harming, irreversibly, our unique natural heritage is upheld.	and guidance and is legally compliant. It illustrates geographically all of the land-use designations relevant to the policies that are contained in the Publication MLP. The MPA acknowledges that any plan modifications may result in changes to the map to ensure it is reflective of the final adopted MLP. The particular matter raised has been considered under Publication MLP Policy MA01 and also Appendix 4: Allocation 01.	
1038720/4/PMP/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
852145/4/PMP/USND	Mr Nigel Gibbons	Forest of Dean District Council	No	(2) Not justified (4) Not consistent with national policy	Yes	The map requires amendment in respect of one preferred area for mineral working (crushed rock, Stowe Hill/ Clearwell).	Please see more detailed representation under site and Policy MA01 (app4)	It is the view of the MPA that the Proposals (Policies) Map fully accords with national policy and guidance and is legally compliant. It illustrates geographically all of the land-use designations relevant to the policies that are contained in the Publication MLP. The	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Proposals Map is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Proposals Map is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								MPA acknowledges that any plan modifications may result in changes to the map to ensure it is reflective of the final adopted MLP. The particular matter raised has been considered under Publication MLP Policy MA01 and also Appendix 4: Allocation 01.	
1164737/4/PMP/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1169771/4/PMP/SND	Mr Michael Krier	Chairman Temple Guiting Parish Council	Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.

Matters related to the Introduction

Publication MLP Consultation Questionnaire Reference | Questions 6.1, 6.2, 6.3, 6.4, 6.5

Representation Reference	Full Name	Organisation Details	Do you consider that Section 1: Introduction (paragraphs 1-16) is sound?	If No, do you consider it is unsound because it is:	Do you consider that Section 1: Introduction (paragraphs 1-16) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/5/INT/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1169771/5/INT/USND	Mr Michael Krier	Chairman Temple Guiting Parish Council	No	(3) Not effective	Yes	The Plan would benefit from a clarification statement on the status of the plan and it's application to existing quarries; extension of existing sites and new applications. Paragraph 6 states " will replace and update all aspects" of the current plan and provides a clear framework for how mineral developments should take place across Gloucestershire. Quarrying is a part of our landscape and plays a key part in providing materials for maintaining the character of our area and is a key source of employment. However we need to manage the level of activity and preserve the AONB.		It is the view of the MPA that the paragraphs, which make up the introduction to the Publication MLP sufficiently, explain the status of document. Paragraph 4 explains the overarching purpose of the plan and its relationship to previously prepared plans. Paragraph 5 justifies why a *'new'* is needed; paragraphs 6 and 7 set out the plan's intended use; and paragraphs 11 and 12 deal with its legal status. In particular, paragraph 7 states; "It is a forward thinking plan with a future vision for the county and objectives to achieve this from 2018 through to the end of 2032.'. This	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that Section 1: Introduction (paragraphs 1-16) is sound?	If No, do you consider it is unsound because it is:	Do you consider that Section 1: Introduction (paragraphs 1-16) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								statement makes it clear that the plan is specifically concerned with future mineral activities starting from 2018 onwards.	
1164090/5/INT/SND	Mr Michael Carr		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1028219/5/INT/USND	Ms Nicola Packer		No	(2) Not justified	No	The plan does not take into account the technological changes that are possible and are taking place and assumes that the need for aggregates will grow. This is not necessarily the case and the plan should take a lead in encouraging innovation in use of materials and more use of recycling. The statement 'This means new mineral resources need to be investigated to see how best they may contribute to future demand.' is tackling the problem from the wrong end. Demand for primary materials must be curtailed by recycling, such as use of recycled plastics in building,	There should be recognition that demand must reduce.	It is the view of the MPA that the plan fully accords with national policy covering the matter of future aggregate supply. This is centred on ensuring there are sufficient supplies to meet our needs and that account is given to the importance of making the best use of aggregates to secure their long-term conservation. The plan has taken account of the contribution made from substitute or secondary and recycled materials and mineral waste. A dedicated policy (SR01) is also at the forefront of the plan, aimed at stimulating and driving up the use of secondary	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that Section 1: Introduction (paragraphs 1-16) is sound?	If No, do you consider it is unsound because it is:	Do you consider that Section 1: Introduction (paragraphs 1-16) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						and more use of renewable materials. The plan is demand driven and this is wrong when the quarrying is so damaging as at Stowe Hill. The ambitions of GFirst LEP should not be taken into account because they are not accountable to the public. Their ambitions have not been tested and are just ideas that certain influential individuals would like to see take place.		and recycled aggregates. The policy's supporting text notes the importance of facilitating "alternative options *(to primary aggregates)*, which are more sustainable". In respect of Local Enterprise Partnerships (LEPs), national policy is clear as to need to engage with them, specifically when responding to strategic planning priorities. Within the context of the county and emerging MLP, the MPA has met its national policy requirements by working with the Gloucestershire LEP – GFirst. Current government policy on LEPs can be found at: - https://www.gov.uk/government/policies/local-enterprise-partnerships-leps-and-enterprise-zones.	
855353/5/INT/SND	Chris McFarling		Yes		Yes			The representation, which considers this	No modifications are considered

Representation Reference	Full Name	Organisation Details	Do you consider that Section 1: Introduction (paragraphs 1-16) is sound?	If No, do you consider it is unsound because it is:	Do you consider that Section 1: Introduction (paragraphs 1-16) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								matter to be 'sound', is noted.	necessary in response to the representation.
1038720/5/INT/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.

Matters related to the Spatial Portrait

Publication MLP Consultation Questionnaire Reference | Questions 7.1, 7.2, 7.3, 7.4, 7.5

Representation Reference	Full Name	Organisation Details	Do you consider that Section 2: Gloucestershire – a spatial portrait (paragraphs 17-64) is sound?	If No, do you consider it is unsound because it is:	Do you consider that Section 2: Gloucestershire – a spatial portrait (paragraphs 17-64) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164090/6/SPT/SND	Mr Michael Carr		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1028219/6/SPT/USND	Ms Nicola Packer		No	(3) Not effective	Yes	Transport Infrastructure 27. does not mention the inferior and often dangerous roads in the Forest of Dean, which are unsuitable for heavy traffic in the vicinity of Stowe Hill quarry. 28. does not recognise that there is only one railway line and station in the Forest of Dean providing a minor service.	Add 'roads near to some of the quarries are unfit to take heavy traffic of lorries and this should be seen as a reason not to permit quarry expansion'.	It is the view of the MPA that Publication MLP paragraph 27 sufficiently highlights the presence of a "sizeable rural road network" and notes the key challenge of accessibility, which arises from it. Similarly, Publication MLP paragraph 28 notes the presence of a "limited rural rail network". Overall the MPA considers the spatial portrait text to offer a reasonable background to the county's transport infrastructure, which has not been challenged by transport operators, regulators (LHA or Highways England), or the rural district council's across	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that Section 2: Gloucestershire – a spatial portrait (paragraphs 17-64) is sound?	If No, do you consider it is unsound because it is:	Do you consider that Section 2: Gloucestershire – a spatial portrait (paragraphs 17-64) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								Gloucestershire.	
855353/6/SPT/SND	Chris McFarling		Yes		Yes			The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1169771/6/SPT/SND	Mr Michael Krier	Chairman Temple Guiting Parish Council	Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1038720/6/SPT/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
793641/1/SPT/COM	Mr Rohan Torkildsen	South West Region Historic England				15,000 Listed buildings are mentioned in para 34 whilst 30,000 in para 366. The SA (page 280) also differs.	Minor clarification/ correction required	It is acknowledged by the MPA that Publication MLP paragraph 34 and 366 would benefit from a minor revision for clarity.	**Minor Modification –** **Whilst Publication MLP paragraph 34 should remain unchanged, Publication MLP paragraph 366 will be revised to read: *"…nearly 13,000 listed buildings…"***
852145/5/SPT/SND	Mr Nigel Gibbons	Forest of Dean District Council	Yes			It would be helpful to add to Para 64 the current position that the FoDDC do not support unconventional exploitation of shale reserves (fracking)		The representation, which considers this matter to be 'sound', is noted. The current policy position of FoDDC regarding unconventional exploitation of shale	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that Section 2: Gloucestershire – a spatial portrait (paragraphs 17-64) is sound?	If No, do you consider it is unsound because it is:	Do you consider that Section 2: Gloucestershire – a spatial portrait (paragraphs 17-64) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								reserves is also noted by the MPA.	
1164737/6/SPT/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable	Not applicable.	The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
794755/3/SPT/COM	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council				In the Council's response to a previous consultation, interest was expressed in the potential for onshore hydrocarbon extraction (including oil and gas) which exists within the County. It is noted that although four licensed areas have been offered within Gloucestershire, no proposals for hydrocarbon extraction, including for initial exploration, have been brought forward and no new licenses covering additional areas have been made available at this stage. There are at present no licences on offer within South Gloucestershire, and officers will be		The representation, acknowledging the current circumstances in Gloucestershire surrounding onshore hydrocarbon extraction is noted.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that Section 2: Gloucestershire – a spatial portrait (paragraphs 17-64) is sound?	If No, do you consider it is unsound because it is:	Do you consider that Section 2: Gloucestershire – a spatial portrait (paragraphs 17-64) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						interested to see how/ whether the situation develops in Gloucestershire			

Matters related to the Drivers for Change

Publication MLP Consultation Questionnaire Reference | Questions 8.1, 8.2, 8.3, 8.4, 8.5

Representation Reference	Full Name	Organisation Details	Do you consider that Section 3: Drivers for change (paragraphs 65-77) is sound?	If No, do you consider it is unsound because it is:	Do you consider that Section 3: Drivers for change (paragraphs 65-77)is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/7/DRI/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
793547/1/DRI/SND	Respondent	Elliott and Sons Ltd	Yes			Agree but only if there are sites for the material to be recycled and sorted on as this often occurs off the construction site. If the Local Plan is serious about promoting this maybe it should build in more opportunities in the wording of the policies to allow this at mineral sites.		The representation and comment, which considers this matter to be 'sound', is noted. Although in respect of concern regarding the future availability of sites and support for them, this is a matter for which an explanation has been given under Publication MLP paragraph 99. It is very much for other local development plan documents to deal with, which appropriate cover the management of waste. Nevertheless, the ambitions contained in the Publication MLP are materially significant and should be taken into account.	No modifications are considered necessary in response to the representation.
1164090/7/DRI/SND	Mr Michael Carr		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1028219/7/DRI/USND	Ms Nicola Packer		No	(3) Not effective	Yes	Under Driver E | Developing secondary & recycled aggregate	Remove the quarries, such as Stowe Hill, which are in sensitive environments	It is the view of the MPA that the Drivers for Change perform their function – which is to	No modifications are considered necessary in response to the

Representation Reference	Full Name	Organisation Details	Do you consider that Section 3: Drivers for change (paragraphs 65-77) is sound?	If No, do you consider it is unsound because it is:	Do you consider that Section 3: Drivers for change (paragraphs 65-77)is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						supplies, 72, it is acknowledged that there is a wealth of recycled aggregate. It says that 'the right business environment must be nurtured to ensure there is sufficient capacity to make best use of the resource in a sustainable way.' The right business environment would be to reduce the amount of primary aggregate available. Nothing less will achieve the required outcome. Driver G | Supporting local growth, 75. The underlying principle of supporting growth is in direct opposition to addressing climate change. Economic growth for it's own sake makes a few people rich but does not improve the quality of life for the majority. The use of the phrase 'much needed new and enhanced infrastructure' has not been supported. Where is the justification for this view? The Gloucester 2050	(proximity to Tufa Dam stream), from the Minerals Plan. This will create the right business environment for the increased use of recycled aggregate.	articulate the anticipated specific spatial implications of economic, social and environmental change affecting Gloucestershire and its sphere of influence over the coming 15 years. In response to the detailed comments made; For Driver E: mandating the creation of local capacity to process recycled and secondary aggregate is outside of the remit of the MLP; For Driver G: the plan overall and particularly this driver is fully complaint with national policy in that it supports the core purpose of the planning system , which is to contribute to the achievement of sustainable development. This means acknowledging the presence and importance of economic requirements in balance with the need to protect and enhance the social dimension and natural environment. It is also contested that economic growth by definition, is in direct contravention with measures to tackle climate change. A key purpose of the plan is to establish a	representation.

Representation Reference	Full Name	Organisation Details	Do you consider that Section 3: Drivers for change (paragraphs 65-77) is sound?	If No, do you consider it is unsound because it is:	Do you consider that Section 3: Drivers for change (paragraphs 65-77)is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						vision includes an ambition for a third river crossing but Highways England do not support this proposal. By being led by organisations such as GFirst LEP, the minerals plan is not being driven by evidence but by ambition. Driver H, 76 The calculations do not take into account innovation and new materials development that could, if correctly encouraged, reduce the need for primary aggregates. The growth of technology will reduce the need for people to travel and therefore the need for new roads, as working from home or a local hub becomes the norm. Driver I | Reducing the impact of mineral transport, 77. how, exactly are you going to encourage greater freight efficiency, reducing vehicle numbers and miles travelled? To say 'may involve' is meaningless without specifics. On site processing may		framework whereby both measures are afforded fair and proportionate consideration and maximum benefit is achieved. For Driver H: The calculations set out in this driver fully accord with approach advocated in national policy and guidance, which requires the contribution made by secondary and recycled aggregates be taken into account. Presently there is no evidence to suggest that a fundamentally different 'demand for aggregates' scenario will emerging during the timeframe of the plan. For Driver I: In address the points raised by this driver, the Publication MLP presents a number of potentially valuable policy measures. For example; Publication MLP Policy MW02 demands for a 'sustainability analysis' (which must consider transport) to be carried out before allowing further working to take place. Furthermore, MLP Policy MW06 also requires a sustainability analysis (which must include transport) to be completed to demonstrate the	

Representation Reference	Full Name	Organisation Details	Do you consider that Section 3: Drivers for change (paragraphs 65-77) is sound?	If No, do you consider it is unsound because it is:	Do you consider that Section 3: Drivers for change (paragraphs 65-77)is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						pose a greater threat to the environment, such as the Tufa Dam stream in the vicinity of Stowe Hill.		acceptability or otherwise of allowing the importation of minerals for processing. Specific matters relating to Publication MLP Allocation 01: Land east of Stowe Hill Quarry are dealt with under the response to representations: - 1028219/12/MW01/USND; 1028219/13/MA01/USND; 1028219/14/MA01/USND; and 1028219/20/AL1/USND	
808023/1/DRI/COM	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd				Para 74 – safeguarding mineral resources should be written in much stronger terms Para 76 - 18 months ago the s&g landbank was 5.94tonnes – current position would be useful in the Plan, not in an appendix.		It is the view of the MPA that the approach to mineral resource safeguarding advocated in Driver F is fully complaint with national policy and guidance and that no local policy justification exists to go further at this time. In terms of the calculations referred to in Driver H, these represented the most-up-to-date data available at the time of publication.	No modifications are considered necessary in response to the representation.
855353/7/DRI/USND	Chris McFarling		No	(3) Not effective	No	The draft MLP states that "The planning system has an important role to play in delivering action on climate change alongside maintaining steady and adequate mineral supplies.	The MLP needs to address the minerals extraction responsibilities to support our governments agreements to reduce CO2 emissions in line with the Paris Accord 2016, and to champion industry	It is the view of the MPA that the Publication MLP as a whole offers a reasonable and proportionate approach to tacking climate change within the limitations of its remit. Tackling climate change is reflected in a number of policy areas beyond transport. For	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that Section 3: Drivers for change (paragraphs 65-77) is sound?	If No, do you consider it is unsound because it is:	Do you consider that Section 3: Drivers for change (paragraphs 65-77)is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						This may arise through efforts to minimise greenhouse gas emissions particularly from transporting minerals; supporting the delivery of infrastructure to increase resilience to climate change impacts..." No mention of the need for carbon auditing, carbon footprinting or the overiding need for quarry operators to reduce their carbon emissions throughout the lifecycle of the mineral extraction process are made. Research at the British Geological Survey has been carried out to quantify the likely embodied energy of aggregate resources without the use of an energy audit. A modified work index ('crushability') test device has been used to determine the embodied energy of aggregate resources. The initial research has focused on	recommendations at reducing carbon footprints across the whole minerals extraction process, not only the transportation system.	example; Publication MLP Policy SR01 – is focused on reducing demand for primary aggregate extraction, which by definition will contribute to the achievement of lower emissions from extractive industries; Policy MW02 – requires a 'need' assessment to be carried out, which again has an impact on mineral supply and demand matters and will contribute to lower emissions overall arising from extractive activities; Policies DM04 and DM05 both seek climate change resilience measures to be brought forward associated with flooding and the water environment; and Policy MR01 provides further opportunities to secure climate change resilience measures.	

Representation Reference	Full Name	Organisation Details	Do you consider that Section 3: Drivers for change (paragraphs 65-77) is sound?	If No, do you consider it is unsound because it is:	Do you consider that Section 3: Drivers for change (paragraphs 65-77)is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Carboniferous limestone as worked in central and northern England. The ultimate aim is to provide baseline information on the likely 'carbon demand' of as yet unworked aggregate resources. This could be presented as spatial data complementary to existing, digital, mineral resource maps. These data will assist in future spatial planning for crushed rock resources. They will also bring a fresh perspective to Mineral Policy Statement 1, which requires that the environmental benefits and constraints of working mineral resources are considered. Carbon Management Good Practice Guide Commissioned by the Quarry Products Association			
1038720/7/DRI/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.

Matters related to the Vision

Publication MLP Consultation Questionnaire Reference | Question 9.1, 9.2, 9.3, 9.4, 9.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Vision is sound?	No, do you consider it is unsound because it is:	Do you consider that the Vision is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164090/8/VIS/SND	Mr Michael Carr		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1028219/8/VIS/USND	Ms Nicola Packer		No	(3) Not effective		There is no information about how smarter and 'more respectful supply routes' are either defined or enforced. In regard to 'minimising adverse impacts and maximising the possibility of achieving enhancements will have been highly influential considerations' there is no definition of how adverse impacts will have been minimised.	Add a section on how they will be defined and enforced.	It is the view of the MPA that the vision contained in the Publication MLP is representative of the aspirations of all elements of the local community (i.e. those living, working and enjoying the county) within the context of planning for minerals. It has evolved over numerous rounds of public consultation. Whilst it aims to be aspirational it is also realistic in what can be delivered taking into account the constraints and opportunities	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Vision is sound?	No, do you consider it is unsound because it is:	Do you consider that the Vision is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								present within Gloucestershire and its sphere of influence. The specific details concerning the delivery of elements of the vision are set out in the remainder of the MLP through the objectives, strategy, policies and also the monitoring framework.	
808023/2/VIS/COM	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd				Para 79 – Vision at 2033 – road haulage from quarries can only use certain routes, to say that “smarter and more respectful supply routes will have been applied” ignores that minerals can only be worked where they lie. Likewise - “opportunities to reduce the frequency and length of haulage journeys”.		It is the view of the MPA that the vision is both aspirational and realistic as required by national policy. In terms of transport matters it is not deemed unreasonable or disproportionate to seek to minimise the conventional movement of mineral (by road). However, this will need to be achieved clearly having regard to the fact that	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Vision is sound?	No, do you consider it is unsound because it is:	Do you consider that the Vision is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								minerals can only be worked where they are found and that more often their need is distant from their source.	
855353/8/VIS/USND	Chris McFarling		No	(3) Not effective	No	The continued exploitation of finite resources is unsustainable. The plan limits its predictions to 2033, yet sustainable development needs to meet the needs of the present without compromising the ability of future generations to meet their own needs. Future generations will include timescales far greater than the next 15 years or so. Continued extraction for present use does not consider the need for sustainable alternatives in the constructions, road building and development industries where	Sit the plan within the longer term context, or at least a date of 2050 when many strategic visions will be deadlined for completion.	It is the view of the MPA that the timeframe attributed to the vision is wholly reasonable. It accords with both national policy and guidance, which states that local plans should look at least 15 years into the future. Whilst the core policies are focused on a 15 year timeframe, key provision policies for aggregates actually go beyond. For example under Publication MLP Policy MW01, the maintenance of a crushed rock landbank equal to least 10 years throughout the plan	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Vision is sound?	No, do you consider it is unsound because it is:	Do you consider that the Vision is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						either new materials or natural materials will be used to prevent resource depletion and associated pollution.		period means that this mineral is being planned for until the end of 2042.	
1038720/8/VIS/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1164737/8/VIS/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
794755/4/VIS/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes			Officers support the County Council's commitment to the 'plan-led system', demonstrated through the preparation of the MLP. Officers also recognise the central importance of the new Minerals Local Plan, both in planning for the future supply of minerals and in determining planning applications for new		The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Vision is sound?	No, do you consider it is unsound because it is:	Do you consider that the Vision is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						mineral development within the County. Officers consider that the MLP presents an appropriate vision for minerals planning in Gloucestershire, which is supported by strategic objectives that articulate the ways in which the vision is intended to be achieved.			

Matters related to the supporting text to the Vision

Publication MLP Consultation Questionnaire Reference | Question 10.1, 10.2, 10.3, 10.4, 10.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to the vision (paragraphs 78-79) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to the vision (paragraphs 78-79) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/9/VIS/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
794755/5/VIS/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes			The suite of policies included within the MLP provide a comprehensive and appropriate framework to guide minerals development across the County and, in doing so, to deliver against the Plan's strategy and its vision. Officers also note and support the inclusion of measures to monitor policy effectiveness as the plan period progresses, in line with the cyclical process of Local Plan preparation: survey, analyse, plan.		The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1164090/9/VIS/SND	Mr Michael Carr		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
855353/9/VIS/USND	Chris McFarling		No	(1) Not positively prepared	No	As above in section 9.	As above in section 9	See the response provided to representation 855353/8/VIS/USND	No modifications are considered necessary in response to the

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to the vision (paragraphs 78-79) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to the vision (paragraphs 78-79) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
									representation.
1038720/9/VIS/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.

Matters relating to the Objectives

Publication MLP Consultation Questionnaire Reference | Questions 11.1, 11.2, 11.3, 11.4, 11.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Objectives is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Objectives is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164090/10/OBS/SND	Mr Michael Carr		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
924705/1/OBS/USND	Respondent	Head of Estates & Planning Breedon Aggregates	No			Page 24: Objective LC- Protecting the amenity of local communities needs to be updated in recognition that unacceptable adverse impacts cannot always be acceptably mitigated. The following wording is suggested: Page 24: Objective RA - Successfully restoring worked-out mineral sites needs to be updated to clarify what is required for site restoration as a combination of all the restoration outcomes proposed would not always be possible. The following wording is suggested: Page 25: Objective MM - Efficient, effective and safe	The following wording is suggested for Objective LC: To avoid adverse impacts on local communities including residents and businesses wherever possible and in all other circumstances, ensure that where possible unacceptable adverse impacts are mitigated effectively throughout the lifetime of development'. The following wording is suggested for Objective RA: 'To secure the highest possible quality of mineral reclamation attainable at the earliest practicable opportunity, which will have enabled	It is the view of the MPA that the plan's objective for protecting the amenity of local communities is appropriate and proportionate. The suggestion that it should look to accommodate accepting 'unacceptable impacts' is refuted. Similarly, there is no justification at the strategic-level of the plan's objectives, to reduce the ambition of maximising benefits associated with mineral restoration.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Objectives is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Objectives is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						movement of minerals does not recognise that mitigation of highways impacts may not always be achievable. The following wording is suggested:	benefits to be maximised, whenever possible, in respect of : – • landscape character; • biodiversity; • geodiversity; • agricultural resources; • public access and recreation; • heritage assets; • contributing to local economic growth; • resilience to future flooding; and • avoiding increased risk to aviation safety, particularly caused by bird hazard.' Bullet points are also suggested for clarity. The following wording is suggested for Objective MM: 'To support the efficiency, effective and safe operation of the County's road networks by – • encouraging the fewest amount of road miles for hauling minerals; • use of the most		

Representation Reference	Full Name	Organisation Details	Do you consider that the Objectives is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Objectives is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
							suitable routes wherever possible; • avoiding adverse impacts on the County's road networks where achievable; and • in all other circumstances, whenever possible, ensuring that effective, sound and enforceable measures are put in place to successfully mitigate any unacceptable adverse impacts.' Bullet points are also suggested for clarity.		
855353/10/OBS/USND	Chris McFarling		No	(2) Not justified (3) Not effective	No	Objective SR highlights the need to promote the maximum use of recycled materials and secondary aggregates. This is not evidenced or supported in the body of the plan. The contribution recycled aggregates may provide is underestimated, even though this may meet the drivers for change and the need to	To consider the original Brundtland commission concept of sustainable development, rather than the trade-off deal between economic, social and environmental gains where economic growth is the main driver of decisions.	It is the view of the MPA that objective SR is imbedded in the plan, particularly section 6 and Publication MLP Policy SR01 | *Maximising the use of secondary and recycled aggregates*	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Objectives is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Objectives is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						apply sustainable development practices to the industry.			
1038720/10/OBS/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1164737/10/OBS/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
794035/1/OBS/SND	Mr Dale Moss	Northcot Brick Ltd	Yes			The draft Minerals Local Plan sets out a number of Objectives which are considered to be clear and concise and set out the way in which the targets of the Plan are to be achieved and how the objectives link to the relevant dimensions of sustainable development. We particularly welcome the inclusion of Objective RM (Effectively Managing Mineral Resources) and Objective PS (Making Provision for the Supply of Minerals) which		The representation, which supports the approach of the MPA, is noted.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Objectives is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Objectives is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						both seek to ensure that an appropriate amount of minerals is provided from appropriate locations across the county for the benefit of the County.			

Matters related to the supporting text to the Objectives

Publication MLP Consultation Questionnaire Reference | Questions 12.1, 12.2, 12.3, 12.4, 12.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to the objectives (paragraphs 80-82) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to the objectives (paragraphs 80-82) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164090/11/OBS/SND	Mr Michael Carr		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
855353/11/OBS/USND	Chris McFarling		No	(1) Not positively prepared (2) Not justified (3) Not effective	No	As above in section 11.	As above in section 11.	The MPA has provided a full response to the concerns referred (see representation reference: 855353/11/OBS/USND).	No modifications are considered necessary in response to the representation.
1038720/11/OBS/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1164737/11/OBS/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.

Matters related to the Strategy

Publication MLP Consultation Questionnaire Reference | Questions 13.1, 13.2, 13.3, 13.4, 13.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Strategy is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Strategy is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/12/STR/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1169771/7/STR/SND	Mr Michael Krier	Chairman Temple Guiting Parish Council	Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
794755/6/STR/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes			Officers support the Plan's strategy, which sets out the approaches taken through the Plan to facilitate delivery against its objectives. In doing so, officers consider that these principles reflect the changes in circumstances which have taken place, both locally in terms of supply and demand and nationally in terms of changes to national policy and guidance, including the requirement to prepare a Local Aggregates Assessment (LAA). The suite of policies included within the MLP provide a comprehensive and		The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Strategy is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Strategy is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						appropriate framework to guide minerals development across the County and, in doing so, to deliver against the Plan's strategy and its vision. Officers also note and support the inclusion of measures to monitor policy effectiveness as the plan period progresses, in line with the cyclical process of Local Plan preparation: survey, analyse, plan.			
1164090/12/STR/SND	Mr Michael Carr		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1028219/9/STR/USND	Ms Nicola Packer		No	(3) Not effective	No	The section beginning "giving prominence to the potential risk of cumulative impacts" does not mention proximity to SSSIs such as Tufa Dams stream. The statement 'where working is justified' does not say how it is justified.	After 'But where working is justified and allowed, an appropriate balance will be achieved that is reflective of the reasonableness of these areas to contribute towards key mineral supplies having given great importance to the protection of landscape quality, scenic beauty, cultural heritage and	It is the view of the MPA that the approach taken to preparing the plan's strategy is proportionate, appropriately balanced and effective in providing a platform from which more detailed, location-specific policies have evolved. Other than referencing AONB designations, which have a strong	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Strategy is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Strategy is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
							wildlife conservation.' Add 'avoid working of aggregate minerals where any possibility of damage to SSSIs'.	strategic sphere of influence across much of Gloucestershire, it would be far too detailed an exercise to provide particular policy direction on specific designation types at the site level.	
924705/2/STR/USND	Respondent	Head of Estates & Planning Breedon Aggregates	No			Page 28: The strategy requirements for restoration are too narrow. For example, mineral voids can provide an excellent location for industrial estates, solar parks or can be development as recreational facilities. Such after uses can have significant benefits to the local economy.		It is the view of the MPA that the approach taken to preparing the plan's strategy is proportionate, appropriately balanced and effective in providing a platform from which more detailed; location-specific policies have evolved. It is contested that the approach to restoration is too narrow. No particular desirable after-uses have been identified and the only prerequisite is to contribute towards sustainable development. Furthermore, avoiding limitations on potentially acceptable after-uses is also referenced as a supported strategic	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Strategy is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Strategy is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								action.	
808023/3/STR/COM	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd				Para 84 The Strategy - again safeguarding needs to be stronger – pre-extraction should be encouraged a every opportunity, current wording leaves a wide gap for developers to say mineral safeguarding is an unreasonable burden. There is an over emphasis on mineral restoration concerns which doesn't reflect how mineral companies now operate or that inappropriate or lacking restoration proposals simply wouldn't get consent		It is the view of the MPA that the approach taken to preparing the plan's strategy is proportionate, appropriately balanced and effective in providing a platform from which more detailed; location-specific policies have evolved.	No modifications are considered necessary in response to the representation.
858234/1/STR/SND	Respondent	Highways England	Yes		Yes		The Mineral Local Plan (MLP) considers clay, coal, limestone, sand / gravel and Sandstone, which are largely concentrated within the four main resource areas of the Cotswolds; Forest of Dean; Seven Vale and Upper Thames Valley in Gloucestershire. A fundamental element of minerals planning is that sites only occur where	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Strategy is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Strategy is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
							resources are found. The Plan provides a clear policy framework for how mineral developments should take place, considering physical and practical circumstances and wider national policies and preferences.		
855353/12/STR/USND	Chris McFarling		No	(3) Not effective	Yes			The representation, which considers this matter to be ‘unsound’ but ‘legally compliant’, is noted. No explanation appears to have been provided as to the ineffectiveness of the strategy. Nevertheless, in response it is the view of the MPA that the approach taken to preparing the plan’s strategy is proportionate, appropriately balanced and effective in providing a platform from which more detailed; location-specific policies have evolved.	No modifications are considered necessary in response to the representation.
1038720/12/STR/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be ‘sound’ and ‘legally compliant’, is noted.	No modifications are considered necessary in response to the representation.

Matters related to the supporting text to the Strategy

Publication MLP Consultation Questionnaire Reference | Questions 14.1, 14.2, 14.3, 14.4, 14.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to the strategy (paragraphs 83-84) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to the strategy (paragraphs 83-84) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/13/STR/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1164090/13/STR/SND	Mr Michael Carr		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
855353/13/STR/SND	Chris McFarling		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1038720/13/STR/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Matters related to Policy SR01 | Maximising the use of secondary and recycled aggregates

Publication MLP Consultation Questionnaire Reference | Questions 15.1, 15.2, 15.3, 15.4, 15.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164090/14/SR01/SND	Mr Michael Carr		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1028219/10/SR01/USND	Ms Nicola Packer		No	(3) Not effective		If the supply of recycled aggregate is not accurately measured, then it is probably much greater than stated and the need for primary aggregates should be reduced. Secondary aggregates should not need to be sourced from Gloucestershire but could come from anywhere. Alternative building materials such as recycled plastic waste is widespread. Policy SR01 - by calculating such high aggregate need, this plan is in direct opposition to the policy of using secondary and recycled aggregates and alternative materials in preference to primary aggregates. There is no definition of	Delete 'reasonable and practicable to do so' under policy SR01. Reduce the number of mineral extraction sites by deleting Stowe Hill expansion.	It is the view of the MPA that Publication MLP Policy SR01 provides a proportionate and balanced approach to seeking to enhance the use of alternative recycled and secondary aggregates in the county. This is a key part of the plan's strategy. It will be for applicants to demonstrate how they have sought to respond to the policy and this should be carried out on a case-by-case basis. The supporting text does offer quite a bit of advice in respect of the scope of and details as to what is required of applicants. Please refer to the response to representation reference: 1028219/20/AL01/USND for matters	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						'reasonable and practicable to do so' and this will change with new technology and innovation. This cannot be investigated on an individual application basis. 91. 'Specific efforts should be made with major non-minerals development proposals to maximise the use of secondary and recycled aggregates and this must be shown through supporting evidence' - this is not workable. The only way to ensure that meaningful (rather than token) efforts are made to reduce the amount of primary aggregates used is to reduce the amount allocated in the plan. Removal of Stowe Hill would help to achieve this. 93 puts too much of a burden on local authorities, who are facing cut backs like all other public bodies. 94. Although I respect the intention that scoping would increase the use of		concerning Publication MLP Allocation 1: Land east of Stowe Hill Quarry.	

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						secondary and recycled, in practice this will be difficult to enforce. The affordable housing viability assessment debacle demonstrates how easy it is for developers to out smart planning authorities and any sort of monitoring is further workload for the already overloaded local authority. The best way to increase the use of secondary and recycled aggregates and alternative materials is to seriously reduce the availability of primary aggregates.			
924705/3/SR01/USND	Respondent	Head of Estates & Planning Breedon Aggregates	No			Policy SR01 - Maximising the use of secondary and recycled aggregates. Who and how will it be defined that recycled and secondary aggregates should be used 'wherever reasonable and practicable to do so'?		It is the view of the MPA that Publication MLP Policy SR01 provides a proportionate and balanced approach to seeking to enhance the use of alternative recycled and secondary aggregates in the county. This is a key part of the plan's strategy. It will be for applicants to demonstrate how they have sought to	**Possible Modification –** **Under Publication MLP paragraph 93, 2nd sentence after *"…responsible for…"* replace with *"…determining whether planning applications accord with policy SR01…"***

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								respond to the policy and this should be carried out on a case-by-case basis. The supporting text does offer quite a bit of advice in respect of the scope of and details as to what is required of applicants. Furthermore, the supporting text also makes it clear that local planning authorities will be responsible for determining whether planning proposals accord with Policy SR01. It is however, acknowledged that the text used would benefit from a minor revision to assist with clarity.	
808023/4/SR01/COM	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd				Policy SR01 – Non-mineral developments should use secondary and recycled aggregates in preference to primary aggregates wherever reasonable and practicable to do so. How will “reasonable and practicable” be measured? And by who?		It is the view of the MPA that Publication MLP Policy SR01 provides a proportionate and balanced approach to seeking to enhance the use of alternative recycled and secondary aggregates in the county. This is a key part of the plan’s strategy. It will be for applicants to demonstrate how	**Possible Modification –** **Under Publication MLP paragraph 93, 2nd sentence after *“…responsible for…”* replace with *“…determining whether planning applications accord with policy SR01…”***

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								they have sought to respond to the policy and this should be carried out on a case-by-case basis. The supporting text does offer quite a bit of advice in respect of the scope of and details as to what is required of applicants. Furthermore, the supporting text also makes it clear that local planning authorities will be responsible for determining whether planning proposals accord with Policy SR01. It is however, acknowledged that the text used would benefit from a minor revision to assist with clarity.	
855353/14/SR01/SND	Chris McFarling		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1038720/14/SR01/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
794030/1/SR01/USND	Respondent	Syreford Quarries & Masonry Ltd	No			Policy SR01 | Maximising the use of secondary and recycled aggregates		It is the view of the MPA that Publication MLP Policy SR01 provides a	

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Whilst welcoming tenet of policy it relates to non-minerals development and is not appropriate to the MLP. How this could be realistically and meaningfully applied? To endeavour to achieve the plan objective the policy should be reworded positively to encourage production of secondary aggregates at existing mineral and other development sites where possible. By increasing/maximising the supply of secondary aggregates this will encourage their increased use in lieu of primarily aggregates.		proportionate and balanced approach to seeking to enhance the use of alternative recycled and secondary aggregates in the county. This is a key part of the plan's strategy. The supporting text offers an explanation as to the point and purpose of the policy and clarifications as to how it forms part of a wider approach to seek an increase in the amount of alternative materials used in construction.	
820738/1/SR01/USND	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd	No			Policy SR01 | Maximising the use of secondary and recycled aggregates Whilst welcoming tenet of policy it relates to non-minerals development and is not appropriate to the MLP. How this could		It is the view of the MPA that Publication MLP Policy SR01 provides a proportionate and balanced approach to seeking to enhance the use of alternative recycled and secondary aggregates in the	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						be realistically and meaningfully applied? To endeavour to achieve the plan objective the policy should be reworded positively to encourage production of secondary aggregates at existing mineral and other development sites where possible. By increasing/maximising the supply of secondary aggregates this will encourage their increased use in lieu of primarily aggregates.		county. This is a key part of the plan's strategy. The supporting text offers an explanation as to the point and purpose of the policy and clarifications as to how it forms part of a wider approach to seek an increase in the amount of alternative materials used in construction.	
1164737/14/SR01/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
793504/1/SR01/USND		Stanway Stone Company	No			Policy SR01 | Maximising the use of secondary and recycled aggregates Whilst welcoming tenet of policy it relates to non-minerals development and is not appropriate to the MLP. How this could be realistically and meaningfully		It is the view of the MPA that Publication MLP Policy SR01 provides a proportionate and balanced approach to seeking to enhance the use of alternative recycled and secondary aggregates in the county. This is a key part of the plan's	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						applied? To endeavour to achieve the plan objective the policy should be reworded positively to encourage production of secondary aggregates at existing mineral and other development sites where possible. By increasing/maximising the supply of secondary aggregates this will encourage their increased use in lieu of primarily aggregates.		strategy. The supporting text offers an explanation as to the point and purpose of the policy and clarifications as to how it forms part of a wider approach to seek an increase in the amount of alternative materials used in construction.	
793895/1/SR01/USND	Respondent	Cotswold Stone Quarries	No			Policy SR01 | Maximising the use of secondary and recycled aggregates Whilst welcoming tenet of policy it relates to non-minerals development and is not appropriate to the MLP. How this could be realistically and meaningfully applied? To endeavour to achieve the plan objective the policy should be reworded positively to encourage		It is the view of the MPA that Publication MLP Policy SR01 provides a proportionate and balanced approach to seeking to enhance the use of alternative recycled and secondary aggregates in the county. This is a key part of the plan's strategy. The supporting text offers an explanation as to the point and purpose of the policy and clarifications as to how it forms part	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						production of secondary aggregates at existing mineral and other development sites where possible. By increasing/maximising the supply of secondary aggregates this will encourage their increased use in lieu of primarily aggregates.		of a wider approach to seek an increase in the amount of alternative materials used in construction.	
794755/7/SR01/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
802358/1/SR01/USND	Respondent	Smiths (Gloucester) Ltd	No			Policy SR01 | Maximising the use of secondary and recycled aggregates Whilst welcoming tenet of policy it relates to non-minerals development and is not appropriate to the MLP. How this could be realistically and meaningfully applied? To endeavour to achieve the plan objective the policy should be reworded positively to encourage production of		It is the view of the MPA that Publication MLP Policy SR01 provides a proportionate and balanced approach to seeking to enhance the use of alternative recycled and secondary aggregates in the county. This is a key part of the plan's strategy. The supporting text offers an explanation as to the point and purpose of the policy and clarifications as to how it forms part of a wider approach	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy SR01 | Maximising the use of secondary and recycled aggregates is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						secondary aggregates at existing mineral and other development sites where possible. By increasing/maximising the supply of secondary aggregates this will encourage their increased use in lieu of primarily aggregates.		to seek an increase in the amount of alternative materials used in construction.	

Matters related to the supporting text to Policy SR01 | Maximising the use of secondary and recycled aggregates

Publication MLP Consultation Questionnaire Reference | Questions 16.1, 16.2, 16.3, 16.4, 16.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy SR01 (paragraphs 85-99) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy SR01 (paragraphs 85-99) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/15/SR01/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be ‘sound’ and ‘legally compliant’, is noted.	No modifications are considered necessary in response to the representation.
1164090/15/SR01/SND	Mr Michael Carr		Yes					The representation, which considers this matter to be ‘sound’, is noted.	No modifications are considered necessary in response to the representation.
1028219/11/SR01/USND	Ms Nicola Packer		No	(3) Not effective		Innovation requires investment. For new materials to be developed the supply of primary aggregates must be reduced. This document looks at the problem from the wrong perspective. It is considering the plan from the view of demand. It should be considering the plan from the view of supply. Primary aggregates should not be allowed to be extracted where it causes social and/or environmental problems. The construction industry will adjust to the decreased supply by	Delete Stowe Hill from the plan.	It is the view of the MPA that the supporting text for Publication MLP Policy SR01 offers sufficiently detailed advice to enable applicants to effectively respond to the policy requirements. The policy is considered to be proportionate and balanced in seeking to enhance the use of alternative, recycled and secondary aggregates in the county. Please refer to the response to representation reference: 1028219/20/AL01/USND for matters concerning Publication MLP Allocation 1: Land east of Stowe Hill Quarry.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy SR01 (paragraphs 85-99) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy SR01 (paragraphs 85-99) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						creating new supplies. Allowing such a large amount of extraction will stifle any investment in new materials or techniques.			
855353/15/SR01/USND	Chris McFarling		No	(3) Not effective	Yes		Policy SR01 Para. 95 "..major non-minerals development proposals that fall short of this target should be required to present a robust justification for doing so" "Should" needs to be replaced with "must". The MLP states that "There is currently no production of secondary aggregate in Gloucestershire. However, the emerging development of a new EfW facility at Javelin Park near Gloucester has the potential to generate a local secondary aggregate source through the processing of incinerator bottom ash. Around 45,000 tonnes per annum of	It is the view of the MPA that the supporting text for Publication MLP Policy SR01 offers sufficiently detailed advice to enable applicants to effectively respond to the policy requirements. The policy is considered to be proportionate and balanced in seeking to enhance the use of alternative, recycled and secondary aggregates in the county. In response to the comments about future sources of secondary aggregates, the Publication MLP provides nothing more than a factual statement about where possible opportunities may arise for the future production of secondary aggregates within Gloucestershire. The emerging MLP has not relied upon bottom ash as a future source of aggregate. However, if this was to be realised and / or expanded in any way then this would be	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy SR01 (paragraphs 85-99) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy SR01 (paragraphs 85-99) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
							incinerator bottom ash aggregate (IBAA) may be made available if the EfW facility operates at its permitted capacity from 2019 onwards. Further development of thermal waste treatment could present opportunities to increase sources of IBAA or other related secondary aggregate materials locally and beyond. The EfW facility conflicts with ambitions to increase recycling and reduce waste across the County. With recent alarm at the plstic pollution crisis in our oceans, and the need to reduce waste at source, and with zero waste initiatives being championed by the welsh Assembly, it is likely that residual waste tonnagesmay not meet the EfW demands, despite increases in populations. Reliance on bottom ash as a major	factored into the regular local assessment and monitoring of future aggregate supplies.	

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy SR01 (paragraphs 85-99) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy SR01 (paragraphs 85-99) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
							source of recycled aggregate should be reconsidered.		
1038720/15/SR01/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be ‘sound’ and ‘legally compliant’, is noted.	No modifications are considered necessary in response to the representation.

Matters related to Policy MS01 | Non-mineral developments within MSAs

Publication MLP Consultation Questionnaire Reference | Questions 17.1, 17.2, 17.3, 17.4, 17.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MS01 | Non-mineral developments within MSAs is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MS01 | Non-mineral developments within MSAs is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164090/16/MS01/SND	Mr Michael Carr		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
924705/4/MS01/USND	Respondent	Head of Estates & Planning Breedon Aggregates	No			Policy MS01 - Non-mineral developments within MSAs. The wording "needless sterilisation" is open to interpretation. Also, how will it be judged if mineral isn't economically valuable? There needs to be a clear requirement that the Mineral Planning Authority (as the mineral specialists) makes such judgements and not the District Councils.		It is the view of the MPA that the approach advocated in Publication MLP policy MS01 is in line with national policy and current established guidance on the matter of mineral resource safeguarding. The policy necessitates appropriately detailed assessments to be completed and the policy's supporting text explains what is expected of applicants. As set out in Publication MLP paragraphs 115 and 116 provision has been made locally through the delineation of Mineral Consultation Areas (MCAs) to ensure the MPA is fully involved in the policy's effective implementation. However, it is	**Possible Modification –** **Replace the 1st sentence, introduce a new 2nd sentence and revise the 3rd sentence for Publication MLP paragraph 122:-** ***"The MRA must meet PERC Reporting Standards. (a footnote will be provided to PERC - The Pan-European Reserves and Resources Reporting Committee Standard of Exploration, Results and Mineral Resources) It must determine the category of mineral resources that are present*** **(i.e.** ***'Inferred', 'Indicated' or 'Measured') and***

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MS01 | Non-mineral developments within MSAs is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MS01 | Non-mineral developments within MSAs is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								acknowledged that the evidential requirements could be made clearer particularly in respect of the standards expected in preparing Mineral Resource Assessments (MRA).	***carefully analyse site-specific circumstances to determine whether there will be a risk of sterilisation from proposed non-minerals development and its significance. In making a judgement, careful consideration will be given to technical details concerning the extent to which non-minerals development may affect access to currently worked minerals and / or unworked, but potentially exploitable resources on the application site and / or nearby, within the sphere of influence of the proposal."***
808023/5/MS01/USND	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd	No			Policy MS01 how will "needless sterilisation" be judged, or how will a judgement on the mineral isn't economically valuable " be made– as it may be viable in the future, when all		It is the view of the MPA that the approach advocated in Publication MLP policy MS01 is in line with national policy and current established guidance on the matter of mineral resource	**Possible Modification –** **Replace the 1st sentence, introduce a new 2nd sentence and revise the 3rd sentence for Publication MLP**

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MS01 | Non-mineral developments within MSAs is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MS01 | Non-mineral developments within MSAs is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						other resources exhausted. The Policy should be re-worded for a presumption in favour of the mineral resource being retained unless it can be demonstrated why not. Current policy wording is not strong enough and offers too many get out clauses for non mineral developments to exploit.		safeguarding. The policy necessitates appropriately detailed assessments to be completed and the policy's supporting text explains what is expected of applicants. However, it is acknowledged that the evidential requirements could be made clearer particularly in respect of the standards expected in preparing Mineral Resource Assessments (MRA).	**paragraph 122:-** ***"The MRA must meet PERC Reporting Standards. (a footnote will be provided to PERC - The Pan-European Reserves and Resources Reporting Committee Standard of Exploration, Results and Mineral Resources) It must determine the category of mineral resources that are present (i.e. 'Inferred', 'Indicated' or 'Measured') and carefully analyse site-specific circumstances to determine whether there will be a risk of sterilisation from proposed non-minerals development and its significance. In making a judgement, careful consideration will be given to technical details concerning the extent to which non-minerals development may affect access to***

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MS01 | Non-mineral developments within MSAs is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MS01 | Non-mineral developments within MSAs is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
									currently worked minerals and / or unworked, but potentially exploitable resources on the application site and / or nearby, within the sphere of influence of the proposal."
855353/16/MS01/USND	Chris McFarling		No	(3) Not effective			Reconsider long term sustainability. MSAs still concern finite resources.	It is the view of the MPA that the approach advocated in Publication MLP policy MS01 is in line with national policy and current established guidance on the matter of mineral resource safeguarding. The policy necessitates appropriately detailed assessments to be completed and the policy's supporting text explains what is expected of applicants.	No modifications are considered necessary in response to the representation.
1038720/16/MS01/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
852145/6/MS01/USND	Mr Nigel Gibbons	Forest of Dean District Council	No	(3) Not effective (4) Not consistent with national policy		Like all MLPs there is a need for the plan to safeguard resources by their identification and the	In order to be compliant, the MLP should cover Neighbourhood development Plans	It is the view of the MPA that the approach advocated in Publication MLP policy MS01 is in line	**Possible Modifications –** **Replace the following in the 1st**

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MS01 | Non-mineral developments within MSAs is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MS01 | Non-mineral developments within MSAs is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Gloucestershire MLP does this. It recognises the extent of mineral deposits which are then subject to a safeguarding policy. This is intended to prevent sterilisation because of other development but it does accept planned (allocated) development which affects safeguarded areas as well as much minor or temporary development should be exempt from the need to be considered. In order to work the safeguarding policy, consultation areas are proposed within which the mineral authority will need to be consulted on eligible planning applications. A Mineral resource Assessment will need to be prepared for these eligible applications. It is expected that there will be few if any cases where objection to an application is made on the grounds that a particular mineral	and permissions in Principle, as well as considering if consultation is likely to be appropriate for any Prior Approvals. Although the process will inevitably complicate the DM process, especially for a two tier authority, it is accepted that it this MLP is following common and accepted practice in its safeguarding policies. The list of exempted development (table 2) is noted although there may be scope for additional types of application to be added such as small housing developments. The MPA is able to make representations to applications in any event and requiring notification and or a safeguarding assessment is considered over the range of applications not in table 2 is too onerous. To take account of the final point above, The MLP policy should be amended along the lines of: "Non-	with national policy and current established guidance on the matter of mineral resource safeguarding. The MPA contests the concern over compliance due to a lack of acknowledgment of Neighbourhood Development Plans. As set out on Publication MLP page 37, Table 2: *List of non-mineral development types for which no mineral resource safeguarding assessment will be required*; all allocations contained within Neighbourhood Plans that have been subject to prior-consideration of safeguarding matters will not need to undergo any detailed mineral resource assessment under Publication MLP policy MS01. However, the MPA does acknowledge that a number of revisions to text of Publication MLP policy MS01 would improve clarity.	**line of the policy; *"developments"* with *"development".*** **Add to clause i of Publication MLP policy MS01; *"..from safeguarding requirements…"* after *"it is exempt…"*** **Add to clause iii of Publication MLP policy MS01; *"(s) of…"* after *"mineral.."* and replace *"concerned"* with *"concern"*** **Add a bullet point item to Table 2 of Publication MLP page 37; *"All development considered under the 'Permission in Principle' consent route unless the Mineral Planning Authority specifically requests that a Mineral Resource Assessment is included on the local Brownfield Land Register entry or a 'Permission in Principle' decision***

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MS01 | Non-mineral developments within MSAs is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MS01 | Non-mineral developments within MSAs is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						should be worked. The situation regarding any potential interaction between Permissions in Principle and Mineral Consultation Areas is unclear and the MLP may need to be updated in the light of new government proposals. Because an NDP is part of the Dev Plan land allocated by one would also be exempt from consultation providing the MLA had adequate opportunity to comment. The MLP will therefore need to refer to both Neighbourhood and other Local Plans. Whatever the ultimate result of these consultations it is inevitable that there will be some degree of additional work involved in the processing of applications. The Gloucestershire approach is similar to many although it may be complicated by being in an area where there are two tiers of local	mineral development within a MSA should demonstrate that: It is exempt… or (etc)."	Furthermore, it is also agreed that the 'Permissions in Principle' consenting regime should also be incorporated into the policy framework. This would be best achieved as an additional item on the Table 2: *List of non-mineral development types.*	***notice."***

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MS01 | Non-mineral developments within MSAs is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MS01 | Non-mineral developments within MSAs is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						government. Particular concern is expressed in respect of the requirements (should in para 121 and normally in 127) for a Mineral resource Assessment. It may be appropriate to consider widening of the exemptions. The Policy MS01 could usefully be revised to take account of the fact that the MLA is unlikely to be the determining authority of non- mineral planning applications. As drafted it uses the term “will be permitted provided”. This could be revised in order to provide greater clarity. The MLP are consultees for almost all non mineral development and may object to certain development. The LPA who make the final decision will in almost all cases be the lower tier (District/ Borough Councils). The policy should therefore be amended.			

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MS01 | Non-mineral developments within MSAs is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MS01 | Non-mineral developments within MSAs is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/16/MS01/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
794755/8/MS01/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.

Matters related to the supporting text to Policy MS01 | Non-mineral developments within MSAs

Publication MLP Consultation Reference | Questions 18.1, 18.2, 18.3, 18.4, 18.5

Person ID	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MS01 (paragraphs 100-127) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MS01 (paragraphs 100-127) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164090/17/MS01/SND	Mr Michael Carr		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
855353/17/MS01/USND	Chris McFarling		No				As above	It is the view of the MPA that the approach advocated in Publication MLP policy MS01 and the supporting text is in line with national policy and current established guidance on the matter of mineral resource safeguarding. The policy necessitates appropriately detailed assessments to be completed and the policy's supporting text explains what is expected of applicants.	No modifications are considered necessary in response to the representation.
1038720/17/MS01/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
852145/7/MS01/USND	Mr Nigel Gibbons	Forest of Dean District Council	No	(3) Not effective (4) Not consistent with national policy		May need amendments as a consequence of those required to the policy		It is the view of the MPA that the approach advocated in Publication MLP policy MS01 and the supporting text is in	No modifications are considered necessary in response to the representation.

Person ID	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MS01 (paragraphs 100-127) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MS01 (paragraphs 100-127) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								line with national policy and current established guidance on the matter of mineral resource safeguarding. However, the MPA does acknowledge some revisions may be beneficial for reasons of clarity, although these do no affect the supporting text.	
1164737/17/MS01/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
794035/2/MS01/SND	Mr Dale Moss	Northcot Brick Ltd	Yes			Quarrying of clay and making bricks at Northcot Brick's Wellacre Quarry in Blockley, Gloucestershire has been carried out for nearly a century. The bricks made there are used in all types of prestigious building projects all over the country. The Northcot Brickworks and adjacent Wellacre Quarry sites are designated as a 'Mineral Resource Area for Brick and Clay' in the draft Minerals Local Plan (MLP). The site is		The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Person ID	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MS01 (paragraphs 100-127) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MS01 (paragraphs 100-127) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						also within an Area of Outstanding Natural Beauty (AONB). It is important that the site and adjacent land is safeguarded to ensure the sustainable production of clay to support the existing brickworks.			

Matters related to Policy MS02 | Safeguarding mineral infrastructure

Publication MLP Consultation Questionnaire Reference | Questions 19.1, 19.2, 19.3, 19.4, 19.5

Person ID	Full Name	Organisation Details	Do you consider that the Policy MS02 | Safeguarding mineral infrastructure is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MS02 | Safeguarding mineral infrastructure is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164090/18/MS02/SND	Mr Michael Carr		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
808023/6/MS02/SND	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd	Yes			Policy MS02 has a more positive wording in relation to safeguarding mineral infrastructure		The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
853003/1/MS02/USND	Policy Manager	Cheltenham Borough Council	No	(1) Not positively prepared		Cheltenham Borough Council welcomes the opportunity to further engage in the ongoing preparation of the Gloucestershire Minerals Local Plan 2018-2032. Our comments on this draft are broadly similar to those we made on the 2016 Minerals Local Plan consultation (see attached). Of particular importance is our comment on Safeguarding mineral infrastructure policy MS02 (previously MS03 in the 2016 consultation). The list of sites included at Appendix 2 provides an	Given this need for versatile employment areas, we think a more flexible approach would be to identify them within the Minerals Plan, but not specifically apply the safeguarding policy to them. We think this view better accords with paragraph 22 of the NPPF which aims to encourage different land uses to support sustainable local communities.	It is the view of the MPA that the policy approach set out in Publication MLP policy MS02 is in line with national policy and guidance on the matter of mineral infrastructure safeguarding. The MPA contests the comments made that the policy could overly restrict the future use of land for employment purposes. Publication MLP policy MS02 presents numerous safeguarding tests to ensure that any restrictions on other types of development are justified and proportionate. The	No modifications are considered necessary in response to the representation.

Person ID	Full Name	Organisation Details	Do you consider that the Policy MS02 | Safeguarding mineral infrastructure is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MS02 | Safeguarding mineral infrastructure is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						essential context for Policy MS02 and it is noted there are 3 sites specifically identified within Cheltenham Borough. These sites are all concrete batching plants (use class B2) and are located within or adjacent to other employment generating land that falls primarily within B class uses. As such, all sites are protected from inappropriate changes of use by adopted local plan policy. Given this situation, it is considered that additional safeguarding of concrete batching plants through the Minerals Plan is too restrictive. These sites are likely to be suitable for reuse and are part of a local mix of business and general industrial uses as specified above. Therefore, should they become no longer suitable for their current purpose we would consider other employment		supporting text also explains how applicants should prepare for such tests. Minerals infrastructure safeguarding is recognised as a 'strategic priority' in Gloucestershire for demonstrating the statutory 'Duty to Co-operate' The matter is contained in the most recent Strategic Planning and Development Issues Memorandum of Understanding (MoU) for Gloucestershire (2017) which has been signed up to by all Gloucestershire local authorities including Cheltenham Borough Council. The MoU specifically states; *"…signatories are currently working together on …protecting safeguarded mineral (and waste) infrastructure from incompatible development through effective co-ordination over development proposals."*	

Person ID	Full Name	Organisation Details	Do you consider that the Policy MS02 | Safeguarding mineral infrastructure is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MS02 | Safeguarding mineral infrastructure is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						uses in these valuable locations.			
1038720/18/MS02/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1164737/18/MS02/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
793547/2/MS02/USND	Respondent	Elliott and Sons Ltd	No			Part III because it is the same as reason II and part IV as nothing should override part I otherwise this will lead to unsuitable development which will lead to conflict and complaints.	Parts III - a suitable replacement mineral infrastructure site has been identified and permitted; and IV - the overriding need for the development outweighs the desirability to safeguard mineral infrastructure should be deleted.	It is the view of the MPA that the policy approach set out in Publication MLP policy MS02 is in line with national policy and guidance on the matter of mineral infrastructure safeguarding. The MPA can see no evidence that the policy requirements are repetitive and therefore need to be reduced.	No modifications are considered necessary in response to the representation.
794755/9/MS02/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound'', is noted.	No modifications are considered necessary in response to the representation.

Matters related to the supporting text to Policy MS02 | Safeguarding mineral infrastructure

Publication MLP Consultation Questionnaire Reference | Questions 20.1, 20.2, 20.3, 20.4, 20.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MS02 (paragraphs 128-137) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MS02 (paragraphs 128-137) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164090/19/MS02/SND	Mr Michael Carr		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1038720/19/MS02/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1164737/19/MS02/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
794755/9/MS01/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.

Matters related to Policy MW01 | Aggregate provision

Publication MLP Consultation Questionnaire Reference | Questions 21.1, 21.2, 21.3, 21.4, 21.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW01 | Aggregate provision is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW01 | Aggregate provision is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164090/20/MW01/SND	Mr Michael Carr		Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1028219/12/MW01/USND	Ms Nicola Packer		No	(2) Not justified		Policy MW01 states that Mineral development proposals for aggregate working will be permitted where it can be demonstrated: - I. they will make a contribution towards maintaining throughout and at the end of the plan period an aggregate landbank requirement of at least 10 years for crushed rock or at least 7 years for sand & gravel, calculated using the rolling 10 years' sales data presented in the annual Gloucestershire Local Aggregates Assessment' – this makes no allowance for innovation or attempt to promote innovation away from mineral dominance in	'Policy MW01 they will make a contribution towards maintaining throughout and at the end of the plan period an aggregate landbank requirement of 5 years for crushed rock or 4 years for sand & gravel.'	It is the view of the MPA that Publication MLP policy MW01 accords with national policy and guidance in this respect of this matter Landbank requirements are set nationally and presently insufficient evidence exists to suggest it would be justified to deviate from this position at the local level.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW01 | Aggregate provision is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW01 | Aggregate provision is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						construction. Also it doesn't mention that mineral development should not be allowed where it would cause habitat damage. The landbank requirement should be far less and based on a supply that would not cause social and/or environmental damage, not on past demand. This would create a situation where investment would be made in alternative materials and technologies.			
808023/7/MW01/COM	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd				Policy MW01 - informing the landbank and therefore need must include broader information than the LAA – as it may not be completed or may be altered during plan period.		It is the view of the MPA that Publication MLP policy MW01 accords with national policy and guidance in this respect of this matter. However, it is acknowledged that the policy wording would benefit from revision to aid with clarity.	**Possible Modification –** **Under the 1st clause of Publication MLP Policy MW01 replace the text after *"…calculated using…"* with *"…the most recent annual Gloucestershire Local Aggregates Assessment."***
1038720/20/MW01/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW01 | Aggregate provision is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW01 | Aggregate provision is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
807759/1/MW01/COM	Mr Ben Horovitz	Strategic Planning Team Worcestershire County Council				Policy MW01 Aggregate provision The policy requires contribution to the landbank calculated using the rolling 10 years' sales data presented in the annual Gloucestershire Local Aggregates Assessment. However, the National Planning Policy Framework requires Local Aggregates Assessments to be "based on a rolling average of 10 years sales data and other relevant local information" (our emphasis). Sufficient flexibility should be built in to the policy to ensure that landbank calculations are based on the latest Local Aggregates Assessment but recognising that the annual provision figure may not always directly reflect the 10 year sales average.	We would suggest amending policy MW01 part I as follows: "they will make a contribution towards maintaining throughout and at the end of the plan period an aggregate landbank requirement of at least 10 years for crushed rock or at least 7 years for sand & gravel, calculated using the most recent annual Gloucestershire Local Aggregates Assessment agreed by the South West Aggregate Working Party"	It is the view of the MPA that Publication MLP policy MW01 would benefit from a revision to aid with clarity on matters relating to the assessment of aggregate landbanks.	**Possible Modification –** **Under the 1st clause of Publication MLP Policy MW01 replace the text after *"…calculated using…"* with *"…the most recent annual Gloucestershire Local Aggregates Assessment."***
1164737/20/MW01/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally	No modifications are considered necessary in response to the

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW01 | Aggregate provision is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW01 | Aggregate provision is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								compliant', is noted.	representation.
794755/10/MW01/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes			As was set out in a previous consultation response, officers have reviewed the evidence presented regarding the requirements for future provision and agree with the approach set out in the Plan. Officers agree that the MLP makes sufficient provision to meet the future forecast requirements from within the county, in with both the current NPPF and the draft revised NPPF (published March 2018).		The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.

Matters related to the supporting text to Policy MW01 | Aggregate provision

Publication MLP Consultation Questionnaire Reference | Questions 22.1, 22.2, 22.3, 22.4, 22.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW01 including section introduction (paragraphs 138-164) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW01 including section introduction (paragraphs 138-164) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
808023/8/MW01/COM	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd				Para 143 – Annual sales of s&g 0.742 million tonnes (2007- 2016 average) - seems very low and if it isn't reflective will create an unfortunately small landbank.		The figure presented in the supporting text to Publication MLP Policy MW01 is taken from the most recently published Gloucestershire Local Aggregate Assessment (6th Version) and represents the 10 years average annual sales for sand and gravel.	No modifications are considered necessary in response to the representation.
1038720/21/MW01/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1164737/21/MW01/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Matters related to Policy MW02 | Natural building stone

Publication MLP Consultation Questionnaire Reference | Questions 23.1, 23.2, 23.3, 23.4, 23.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW02 | Natural building stone is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW02 | Natural building stone is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1038720/22/MW02/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
794030/2/MW02/USND	Respondent	Syreford Quarries & Masonry Ltd	No			Policy MW02 | Natural building stone The Mineral Local Plan fails to acknowledge the scale of the building stone industry in Gloucestershire and the contribution it makes to the economic, environmental and social roles in the county. That failure prevents the adoption of a proper planning framework which should be provided for the industry. The Minerals Plan fails to emphasise the importance of the contribution to the minerals sector this industry makes in Gloucestershire. It fails to recognise that Minerals Plan support is vital to ensure an adequate supply of building		It is the view of the MPA that the approach set out in Publication MLP policy MW02 is balanced and proportionate and compliant with national policy. The policy is permissive, but in being so, is also reflective of the local circumstances in Gloucestershire, whereby building stone resources are located in or near to designated areas of environmental value (e.g. AONBs) which must be afforded appropriate protection. To adopt a more relaxed policy framework would risk contravening national policy and therefore the ability to secure sustainable development.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW02 | Natural building stone is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW02 | Natural building stone is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						stones continues to be available so that the local character of the county can be maintained. There are many natural stone operations in the county particularly in the Cotswolds and the Forest of Dean. The Minerals Plan should identify the number of building stone quarries in the county and the nature of the stone which it produces and the nature of the uses to which it is put but, as there is no meaningful acknowledgement of them, there is no appropriate policy to provide for the continuity of supply both locally and regionally. Fundamentally the Plan fails to provide a positive framework to support investment in appropriate sites, facilities and skills. The building stone industry in Gloucestershire is one of high local economic value operating in rural areas with a very			

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW02 | Natural building stone is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW02 | Natural building stone is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						skilled work force producing high quality, value added products from ashlar walling to city street paving, architectural features to ornamental carving. It is important not only to the local AONB environment in the repair and conservation of historic and heritage buildings and features but also beyond the AONB. It is used in new building developments in towns and villages throughout the county and further afield where high design standards are sought but building stone resource is limited or non-existent. The direction of proposed policy MW02 is one which endeavours to constrain future development. Indeed it fails to even offer security for the established building stone operations in Gloucestershire and gives the industry insufficient recognition of its importance. Given			

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW02 | Natural building stone is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW02 | Natural building stone is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						the number of sites, most of which are now long established, the Minerals Plan should not be constraining and restrictive but should adopt an inclusive, favourable, supportive approach to this important industry and to the extensions or new quarry developments which will be required throughout the period of the Plan. Policy MW02 refers to 'Mineral development' i.e. a definition which is broader than just extraction. However, the Minerals Plan fails to recognise the extent of working and processing of building stone in Gloucestershire and the long history and the skills and experience of those employed in this sector. As a consequence the policy is unclear what it means particularly given the later policy MW06 which refers to ancillary development but			

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW02 | Natural building stone is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW02 | Natural building stone is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						only in the context of aggregates operations not building stone. There is only a single mention of 'cutting' in its associated text. The policy should acknowledge that local operators are in the forefront of this developing sector and it should encourage related investment to maintain the county's strong position and to promote sustainable growth and capitalise on the county's natural assets, skills and knowledge base. The industry requires specialist cutting sheds and masonry operations which should receive a positive policy presumption in favour particularly when they are located at existing quarry operations and satisfy general policy constraints. It requires investment in skills and training much of it nowadays being highly technical and computer based. It requires investment			

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW02 | Natural building stone is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW02 | Natural building stone is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						in specialist plant and machinery. Unless support through the Minerals Plan is lent to the industry to continue growth, investment in skills and training and new plant and machinery will not automatically occur. Cross reference to MW06 is not sufficient enough.			
820738/2/MW02/USND	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd	No			Policy MW02 | Natural building stone The Mineral Local Plan fails to acknowledge the scale of the building stone industry in Gloucestershire and the contribution it makes to the economic, environmental and social roles in the county. That failure prevents the adoption of a proper planning framework which should be provided for the industry. The Minerals Plan fails to emphasise the importance of the contribution to the minerals sector this industry makes in Gloucestershire. It		It is the view of the MPA that the approach set out in Publication MLP policy MW02 is balanced and proportionate and compliant with national policy. The policy is permissive, but in being so, is also reflective of the local circumstances in Gloucestershire, whereby building stone resources are located in or near to designated areas of environmental value (e.g. AONBs) which must be afforded appropriate protection. To adopt a more relaxed policy framework would risk contravening national policy and	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW02 | Natural building stone is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW02 | Natural building stone is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						fails to recognise that Minerals Plan support is vital to ensure an adequate supply of building stones continues to be available so that the local character of the county can be maintained. There are many natural stone operations in the county particularly in the Cotswolds and the Forest of Dean. The Minerals Plan should identify the number of building stone quarries in the county and the nature of the stone which it produces and the nature of the uses to which it is put but, as there is no meaningful acknowledgement of them, there is no appropriate policy to provide for the continuity of supply both locally and regionally. Fundamentally the Plan fails to provide a positive framework to support investment in appropriate sites, facilities and skills. The building stone industry in		therefore the ability to secure sustainable development.	

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						Gloucestershire is one of high local economic value operating in rural areas with a very skilled work force producing high quality, value added products from ashlar walling to city street paving, architectural features to ornamental carving. It is important not only to the local AONB environment in the repair and conservation of historic and heritage buildings and features but also beyond the AONB. It is used in new building developments in towns and villages throughout the county and further afield where high design standards are sought but building stone resource is limited or non-existent. The direction of proposed policy MW02 is one which endeavours to constrain future development. Indeed it fails to even offer security for the established building stone operations in			

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						Gloucestershire and gives the industry insufficient recognition of its importance. Given the number of sites, most of which are now long established, the Minerals Plan should not be constraining and restrictive but should adopt an inclusive, favourable, supportive approach to this important industry and to the extensions or new quarry developments which will be required throughout the period of the Plan. Policy MW02 refers to 'Mineral development' i.e. a definition which is broader than just extraction. However, the Minerals Plan fails to recognise the extent of working and processing of building stone in Gloucestershire and the long history and the skills and experience of those employed in this sector. As a consequence the policy is unclear what it means			

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						particularly given the later policy MW06 which refers to ancillary development but only in the context of aggregates operations not building stone. There is only a single mention of 'cutting' in its associated text. The policy should acknowledge that local operators are in the forefront of this developing sector and it should encourage related investment to maintain the county's strong position and to promote sustainable growth and capitalise on the county's natural assets, skills and knowledge base. The industry requires specialist cutting sheds and masonry operations which should receive a positive policy presumption in favour particularly when they are located at existing quarry operations and satisfy general policy constraints. It requires investment in skills and training			

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						much of it nowadays being highly technical and computer based. It requires investment in specialist plant and machinery. Unless support through the Minerals Plan is lent to the industry to continue growth, investment in skills and training and new plant and machinery will not automatically occur. Cross reference to MW06 is not sufficient enough.			
1164737/22/MW02/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be ‘sound’ and ‘legally compliant’, is noted.	No modifications are considered necessary in response to the representation.
793504/2/MW02/USND		Stanway Stone Company	No			Policy MW02 | Natural building stone The Mineral Local Plan fails to acknowledge the scale of the building stone industry in Gloucestershire and the contribution it makes to the economic, environmental and social roles in the county. That failure prevents the adoption of a proper planning framework		It is the view of the MPA that the approach set out in Publication MLP policy MW02 is balanced and proportionate and compliant with national policy. The policy is permissive, but in being so, is also reflective of the local circumstances in Gloucestershire, whereby building stone resources are located in or near to designated areas of	No modifications are considered necessary in response to the representation.

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						which should be provided for the industry. The Minerals Plan fails to emphasise the importance of the contribution to the minerals sector this industry makes in Gloucestershire. It fails to recognise that Minerals Plan support is vital to ensure an adequate supply of building stones continues to be available so that the local character of the county can be maintained. There are many natural stone operations in the county particularly in the Cotswolds and the Forest of Dean. The Minerals Plan should identify the number of building stone quarries in the county and the nature of the stone which it produces and the nature of the uses to which it is put but, as there is no meaningful acknowledgement of them, there is no appropriate policy to provide for the continuity of supply both locally and		environmental value (e.g. AONBs) which must be afforded appropriate protection. To adopt a more relaxed policy framework would risk contravening national policy and therefore the ability to secure sustainable development.	

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						regionally. Fundamentally the Plan fails to provide a positive framework to support investment in appropriate sites, facilities and skills. The building stone industry in Gloucestershire is one of high local economic value operating in rural areas with a very skilled work force producing high quality, value added products from ashlar walling to city street paving, architectural features to ornamental carving. It is important not only to the local AONB environment in the repair and conservation of historic and heritage buildings and features but also beyond the AONB. It is used in new building developments in towns and villages throughout the county and further afield where high design standards are sought but building stone resource is limited or non-			

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						existent. The direction of proposed policy MW02 is one which endeavours to constrain future development. Indeed it fails to even offer security for the established building stone operations in Gloucestershire and gives the industry insufficient recognition of its importance. Given the number of sites, most of which are now long established, the Minerals Plan should not be constraining and restrictive but should adopt an inclusive, favourable, supportive approach to this important industry and to the extensions or new quarry developments which will be required throughout the period of the Plan. Policy MW02 refers to 'Mineral development' i.e. a definition which is broader than just extraction. However, the Minerals Plan fails to recognise the extent of working and processing of			

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						building stone in Gloucestershire and the long history and the skills and experience of those employed in this sector. As a consequence the policy is unclear what it means particularly given the later policy MW06 which refers to ancillary development but only in the context of aggregates operations not building stone. There is only a single mention of ‘cutting’ in its associated text. The policy should acknowledge that local operators are in the forefront of this developing sector and it should encourage related investment to maintain the county’s strong position and to promote sustainable growth and capitalise on the county’s natural assets, skills and knowledge base. The industry requires specialist cutting sheds and masonry operations which should receive a			

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						positive policy presumption in favour particularly when they are located at existing quarry operations and satisfy general policy constraints. It requires investment in skills and training much of it nowadays being highly technical and computer based. It requires investment in specialist plant and machinery. Unless support through the Minerals Plan is lent to the industry to continue growth, investment in skills and training and new plant and machinery will not automatically occur. Cross reference to MW06 is not sufficient enough.			
793895/2/MW02/USND	Respondent	Cotswold Stone Quarries	No			Policy MW02 | Natural building stone The Mineral Local Plan fails to acknowledge the scale of the building stone industry in Gloucestershire and the contribution it makes to the economic, environmental and		It is the view of the MPA that the approach set out in Publication MLP policy MW02 is balanced and proportionate and compliant with national policy. The policy is permissive, but in being so, is also reflective of the local circumstances	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW02 | Natural building stone is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW02 | Natural building stone is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						social roles in the county. That failure prevents the adoption of a proper planning framework which should be provided for the industry. The Minerals Plan fails to emphasise the importance of the contribution to the minerals sector this industry makes in Gloucestershire. It fails to recognise that Minerals Plan support is vital to ensure an adequate supply of building stones continues to be available so that the local character of the county can be maintained. There are many natural stone operations in the county particularly in the Cotswolds and the Forest of Dean. The Minerals Plan should identify the number of building stone quarries in the county and the nature of the stone which it produces and the nature of the uses to which it is put but, as there is no meaningful acknowledgement of		in Gloucestershire, whereby building stone resources are located in or near to designated areas of environmental value (e.g. AONBs) which must be afforded appropriate protection. To adopt a more relaxed policy framework would risk contravening national policy and therefore the ability to secure sustainable development.	

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW02 | Natural building stone is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW02 | Natural building stone is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						them, there is no appropriate policy to provide for the continuity of supply both locally and regionally. Fundamentally the Plan fails to provide a positive framework to support investment in appropriate sites, facilities and skills. The building stone industry in Gloucestershire is one of high local economic value operating in rural areas with a very skilled work force producing high quality, value added products from ashlar walling to city street paving, architectural features to ornamental carving. It is important not only to the local AONB environment in the repair and conservation of historic and heritage buildings and features but also beyond the AONB. It is used in new building developments in towns and villages throughout the county and further			

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						afield where high design standards are sought but building stone resource is limited or non-existent. The direction of proposed policy MW02 is one which endeavours to constrain future development. Indeed it fails to even offer security for the established building stone operations in Gloucestershire and gives the industry insufficient recognition of its importance. Given the number of sites, most of which are now long established, the Minerals Plan should not be constraining and restrictive but should adopt an inclusive, favourable, supportive approach to this important industry and to the extensions or new quarry developments which will be required throughout the period of the Plan. Policy MW02 refers to 'Mineral development' i.e. a definition which is broader than just			

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW02 | Natural building stone is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW02 | Natural building stone is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						extraction. However, the Minerals Plan fails to recognise the extent of working and processing of building stone in Gloucestershire and the long history and the skills and experience of those employed in this sector. As a consequence the policy is unclear what it means particularly given the later policy MW06 which refers to ancillary development but only in the context of aggregates operations not building stone. There is only a single mention of 'cutting' in its associated text. The policy should acknowledge that local operators are in the forefront of this developing sector and it should encourage related investment to maintain the county's strong position and to promote sustainable growth and capitalise on the county's natural assets, skills and knowledge base.			

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW02 | Natural building stone is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW02 | Natural building stone is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						The industry requires specialist cutting sheds and masonry operations which should receive a positive policy presumption in favour particularly when they are located at existing quarry operations and satisfy general policy constraints. It requires investment in skills and training much of it nowadays being highly technical and computer based. It requires investment in specialist plant and machinery. Unless support through the Minerals Plan is lent to the industry to continue growth, investment in skills and training and new plant and machinery will not automatically occur. Cross reference to MW06 is not sufficient enough.			
802358/2/MW02/USND	Respondent	Smiths (Gloucester) Ltd	No			Policy MW02 | Natural building stone The Mineral Local Plan fails to acknowledge the scale of the building stone industry in		It is the view of the MPA that the approach set out in Publication MLP policy MW02 is balanced and proportionate and compliant with	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW02 | Natural building stone is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW02 | Natural building stone is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Gloucestershire and the contribution it makes to the economic, environmental and social roles in the county. That failure prevents the adoption of a proper planning framework which should be provided for the industry. The Minerals Plan fails to emphasise the importance of the contribution to the minerals sector this industry makes in Gloucestershire. It fails to recognise that Minerals Plan support is vital to ensure an adequate supply of building stones continues to be available so that the local character of the county can be maintained. There are many natural stone operations in the county particularly in the Cotswolds and the Forest of Dean. The Minerals Plan should identify the number of building stone quarries in the county and the nature of the stone which it produces		national policy. The policy is permissive, but in being so, is also reflective of the local circumstances in Gloucestershire, whereby building stone resources are located in or near to designated areas of environmental value (e.g. AONBs) which must be afforded appropriate protection. To adopt a more relaxed policy framework would risk contravening national policy and therefore the ability to secure sustainable development.	

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW02 | Natural building stone is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW02 | Natural building stone is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						and the nature of the uses to which it is put but, as there is no meaningful acknowledgement of them, there is no appropriate policy to provide for the continuity of supply both locally and regionally. Fundamentally the Plan fails to provide a positive framework to support investment in appropriate sites, facilities and skills. The building stone industry in Gloucestershire is one of high local economic value operating in rural areas with a very skilled work force producing high quality, value added products from ashlar walling to city street paving, architectural features to ornamental carving. It is important not only to the local AONB environment in the repair and conservation of historic and heritage buildings and features but also beyond the AONB. It is used in new			

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						building developments in towns and villages throughout the county and further afield where high design standards are sought. The direction of proposed policy MW02 is one which endeavours to constrain future development. Indeed it fails to even offer security for the established building stone operations in Gloucestershire and gives the industry insufficient recognition of its importance. Given the number of sites, most of which are now long established, the Minerals Plan should not be constraining and restrictive but should adopt an inclusive, favourable, supportive approach to this important industry and to the extensions or new quarry developments which will be required throughout the period of the Plan. Policy MW02 refers to 'Mineral development' i.e. a			

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						definition which is broader than just extraction. However, the Minerals Plan fails to recognise the extent of working and processing of building stone in Gloucestershire and the long history and the skills and experience of those employed in this sector. As a consequence the policy is unclear what it means particularly given the later policy MW06 which refers to ancillary development but only in the context of aggregates operations not building stone. There is only a single mention of 'cutting' in its associated text. The policy should acknowledge that local operators are in the forefront of this developing sector and it should encourage related investment to maintain the county's strong position and to promote sustainable growth and capitalise on the county's natural			

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW02 | Natural building stone is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW02 | Natural building stone is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						assets, skills and knowledge base. The industry requires specialist cutting sheds and masonry operations which should receive a positive policy presumption in favour particularly when they are located at existing quarry operations and satisfy general policy constraints. It requires investment in skills and training much of it nowadays being highly technical and computer based. It requires investment in specialist plant and machinery. Unless support through the Minerals Plan is lent to the industry to continue growth, investment in skills and training and new plant and machinery will not automatically occur. Cross reference to MW06 is not sufficient enough.			
1170897/1/MW02/USND	Respondent	Forest of Dean Stone Firms	No			The Minerals Local Plan fails to acknowledge the scale of the building stone industry in Gloucestershire and		It is the view of the MPA that the approach set out in Publication MLP policy MW02 is balanced and	No modifications are considered necessary in response to the representation.

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						the contribution it makes to the economic, environmental and social roles in the county. That failure prevents the adoption of a proper planning framework which should be provided for the industry. The Minerals Plan fails to emphasise the importance of the contribution to the minerals sector which our industry makes not only in the Forest of Dean, but throughout Gloucestershire and nationally. It fails to recognise that Minerals Plan support is vital to ensure an adequate supply of building stones continues to be available so that the local character of the county can be maintained. Fundamentally the Plan fails to provide a positive framework to support investment in appropriate sites, facilities and skills. The building stone industry in Gloucestershire is		proportionate and compliant with national policy. The policy is permissive, but in being so, is also reflective of the local circumstances in Gloucestershire, whereby building stone resources are located in or near to designated areas of environmental value (e.g. AONBs) which must be afforded appropriate protection. To adopt a more relaxed policy framework would risk contravening national policy and therefore the ability to secure sustainable development.	

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						one of high local economic value operating in rural areas with a very skilled work force producing high quality, value added products from ashlar walling to city street paving, architectural features to ornamental carving. It is important not only to the local Forest environment in the repair and conservation of historic and heritage buildings and features but also beyond the AONB. It is used in new building developments in towns and villages throughout the county and nationally where high design standards are sought. However, the direction of proposed policy MW02 is one which endeavours to constrain future development. Indeed it fails to even offer security for the established building stone operations and gives the industry insufficient recognition of its importance. Given			

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						the nature and size of our industry and the economic benefits which it provides in a rural area, the Minerals Plan should not be constraining and restrictive but should adopt an inclusive, favourable, supportive approach. The Minerals Plan should underpin this important industry and strongly support extensions or new quarry developments which will be required throughout the period of the Plan subject, of course, to being environmentally satisfactory. Policy MW02 refers to 'Mineral development' i.e. a definition which is broader than just extraction. However, the Minerals Plan fails to recognise the extent of working and processing of building stone in Gloucestershire and the long history and the skills and experience of those employed in this sector. As a consequence the			

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						policy is unclear what it means particularly given the later policy MW06 which refers to ancillary development but only in the context of aggregates operations not building stone. There is only a single mention of ‘cutting’ in its associated text. Our stone works at Bixlade combines modern, high-tech cutting and processing equipment with traditional masonry skills. Over the last fifteen years it has been the subject of significant investment to improve, enhance and modernise.			

Matters related to the supporting text to Policy MW02 | Natural building stone

Publication MLP Consultation Questionnaire Reference | Question 24.1, 24.2, 24.3, 24.4, 24.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/23/MW02/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1169771/8/MW02/USND	Mr Michael Krier	Chairman Temple Guiting Parish Council	No	(3) Not effective		Clarification is needed on the intent of a degree of flexibility in may be shown when analysing individual proposals for small scale natural building stone workings stated in paragraph 174. The Plan wording para 172 "A robust justification for allowing future natural building stone working in Gloucestershire must be shown" should be emphasised.		It is the view of the MPA that the approach set out in the supporting text to Publication MLP policy MW02 is balanced and proportionate and compliant with national policy. Specifically in terms of Publication MLP paragraph 174 this seeks to ensure due consideration is given to the common attributes of small-scale natural building stone operations (i.e. intermittency and low rates of working). These are discusses in national policy and need to be balanced against other national policy ambitious such as securing minimal levels of disruption through progressive and rapid restoration and reclamation of mineral sites. Due to	**Possible Modification –** **The final sentence of Publication MLP paragraph 174 to be replaced with;** ***"However, as supported by national policy, a degree of flexibility may be shown when analysing individual proposals for small-scale natural building stone working. On a case by case basis it may be justified for proposals to involve relatively low rates of extraction, periods of intermittent working and as a consequence, relatively longer planning permission timeframes than would otherwise be anticipated and***

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								the variability in the types of operations and site-specific circumstances it is deemed wholly appropriate for this matter to be looked at on a case-by-case basis. However, it is acknowledged that the supporting text in this regard would benefit from a revision.	***desirable.'***
793504/3/MW02/USND		Stanway Stone Company	No			In paragraph 173 there is a reference to the requirement for a 'sufficiently detailed' Building Stone Assessment (BSA). More clarity should be given as to what this is, what should be provided, and why, and what its purpose is. It is not a requirement of the NPPG. In particular a BSA should not need to be provided for development relating to existing established operations which represent a continuation of their operations or natural expansion. Para 174 fails to recognise that sustainability is not a		It is the view of the MPA that the approach set out in the supporting text to Publication MLP policy MW02 is balanced and proportionate and compliant with national policy. The specific assessment requirement set out in Publication MLP paragraph 173 represents a fair and consistent methodology for ensuring that proposals are sufficiently well evidenced to be able demonstrate accordance with key policy requirements – principally centred on the 'need' for working to take	**Possible Modifications –** **The final sentence of Publication MLP paragraph 174 to be replaced with;** ***"However, as supported by national policy, a degree of flexibility may be shown when analysing individual proposals for small-scale natural building stone working. On a case by case basis it may be justified for proposals to involve relatively low rates of extraction, periods of intermittent working and as a consequence, relatively longer***

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						function of scale. Whilst some small scale building stone quarries exist, it should be recognised that many are large scale with a substantial output and large employment centres. They are important for the economic, social and environmental benefits which they import to rural areas of the county and should be recognised and supported, not neglected in policy terms because of their size. Paragraph 176 cautiously tip-toes around the need for skills and training and begrudgingly suggests that a provision for apprenticeship could be significant but, to achieve the investment required from the industry, the Minerals Plan must instead be openly and strongly supportive of the natural stone industry and the variety of jobs and skills which is		place. It is strongly contested that the presence of existing working represents any kind of justification in its own right to allow further working to occur. Each proposal must be seen on its own merits taking into account circumstances at the time of the determination. It is also strongly contested that the supporting text under Publication MLP paragraph 174 infers scale to be a determinant of sustainability. The text seeks to explain which circumstances (i.e. small-scale working) would potentially justify the acceptability of normally undesirable characteristics – such as protracted timescales and intermittent activity. It is however acknowledged that the text in this regard would benefit from a revision. Furthermore, whilst the content is deemed reasonable, Publication MLP	***planning permission timeframes than would otherwise be anticipated and desirable.'*** **The final two sentences of Publication MLP paragraph 176 to be replaced with;** ***"However, it is equally important to demonstrate how any potential negative economic impacts will be avoided, mitigated or justifiably outweighed. An assessment, which identifies and then analyses the significance of any possible economic impacts on businesses that operate locally and those activities could be sensitive to environmental change brought about by proposals for mineral working, will represent credible and valuable evidence in respect of this matter."***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						required to enable it to function. The purpose of a Minerals Plan is to provide the framework to enable a viable, valuable and robust natural stone industry to thrive in the county. This chapter on natural building stone fails to do so principally because the Planning Authority appears not to recognise or understand the industry, its importance, its vitality and its needs for the future. Consequently the chapter is unsound as a planning policy.		paragraph 176 would benefit from a revision to clarity what is considered to be adequate and appropriate economic evidence.	
793895/3/MW02/USND	Respondent	Cotswold Stone Quarries	No			In paragraph 173 there is a reference to the requirement for a 'sufficiently detailed' Building Stone Assessment (BSA). More clarity should be given as to what this is, what should be provided, and why, and what its purpose is. It is not a requirement of the NPPG. In particular a BSA should not need to be provided for		It is the view of the MPA that the approach set out in the supporting text to Publication MLP policy MW02 is balanced and proportionate and compliant with national policy. The specific assessment requirement set out in Publication MLP paragraph 173 represents a fair and consistent	**Possible Modifications –** **The final sentence of Publication MLP paragraph 174 to be replaced with;** ***"However, as supported by national policy, a degree of flexibility may be shown when analysing individual proposals for small-scale natural building stone***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						development relating to existing established operations which represent a continuation of their operations or natural expansion. Para 174 fails to recognise that sustainability is not a function of scale. Whilst some small scale building stone quarries exist, it should be recognised that many are large scale with a substantial output and large employment centres. The building stone operations at Cotswold Hill employ over 15 people. They are important for the economic, social and environmental benefits which they import to rural areas of the county and should be recognised and supported, not neglected in policy terms because of their size. Paragraph 176 cautiously tip-toes around the need for skills and training and begrudgingly suggests that a		methodology for ensuring that proposals are sufficiently well evidenced to be able demonstrate accordance with key policy requirements – principally centred on the 'need' for working to take place. It is strongly contested that the presence of existing working represents any kind of justification in its own right to allow further working to occur. Each proposal must be seen on its own merits taking into account circumstances at the time of the determination. It is also strongly contested that the supporting text under Publication MLP paragraph 174 infers scale to be a determinant of sustainability. The text seeks to explain which circumstances (i.e. small-scale working) would potentially justify the acceptability of normally undesirable characteristics – such as protracted	***working. On a case by case basis it may be justified for proposals to involve relatively low rates of extraction, periods of intermittent working and as a consequence, relatively longer planning permission timeframes than would otherwise be anticipated and desirable.'*** **The final two sentences of Publication MLP paragraph 176 to be replaced with;** ***"However, it is equally important to demonstrate how any potential negative economic impacts will be avoided, mitigated or justifiably outweighed. An assessment, which identifies and then analyses the significance of any possible economic impacts on businesses that operate locally and those activities could be sensitive to environmental***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						provision for apprenticeship could be significant but, to achieve the investment required from the industry, the Minerals Plan must instead be openly and strongly supportive of the natural stone industry and the variety of jobs and skills which is required to enable it to function. The purpose of a Minerals Plan is to provide the framework to enable a viable, valuable and robust natural stone industry to thrive in the county. This chapter on natural building stone fails to do so principally because the Planning Authority appears not to recognise or understand the industry, its importance, its vitality and its needs for the future. Consequently the chapter is unsound as a planning policy.		timescales and intermittent activity. It is however acknowledged that the text in this regard would benefit from a revision. Furthermore, whilst the content is deemed reasonable, Publication MLP paragraph 176 would benefit from a revision to clarity what is considered to be adequate and appropriate economic evidence.	***change brought about by proposals for mineral working, will represent credible and valuable evidence in respect of this matter."***
802358/3/MW02/USND	Respondent	Smiths (Gloucester) Ltd	No			In paragraph 173 there is a reference to the requirement		It is the view of the MPA that the approach set out in	**Possible Modifications –**

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						for a 'sufficiently detailed' Building Stone Assessment (BSA). More clarity should be given as to what this is, what should be provided, and why, and what its purpose is. It is not a requirement of the NPPG. In particular a BSA should not need to be provided for development relating to existing established operations which represent a continuation of their operations or natural expansion. Para 174 fails to recognise that sustainability is not a function of scale. Whilst some small scale building stone quarries exist, it should be recognised that many are large scale with a substantial output and large employment centres. They are important for the economic, social and environmental benefits which they import to rural areas of the county and should be		the supporting text to Publication MLP policy MW02 is balanced and proportionate and compliant with national policy. The specific assessment requirement set out in Publication MLP paragraph 173 represents a fair and consistent methodology for ensuring that proposals are sufficiently well evidenced to be able demonstrate accordance with key policy requirements – principally centred on the 'need' for working to take place. It is strongly contested that the presence of existing working represents any kind of justification in its own right to allow further working to occur. Each proposal must be seen on its own merits taking into account circumstances at the time of the determination. It is also strongly contested that the supporting text under	**The final sentence of Publication MLP paragraph 174 to be replaced with;** ***"However, as supported by national policy, a degree of flexibility may be shown when analysing individual proposals for small-scale natural building stone working. On a case by case basis it may be justified for proposals to involve relatively low rates of extraction, periods of intermittent working and as a consequence, relatively longer planning permission timeframes than would otherwise be anticipated and desirable.'*** **The final two sentences of Publication MLP paragraph 176 to be replaced with;** ***"However, it is equally important to demonstrate how any potential negative economic impacts will be***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						recognised and supported, not neglected in policy terms because of their size. Paragraph 176 cautiously tip-toes around the need for skills and training and begrudgingly suggests that a provision for apprenticeship could be significant but, to achieve the investment required from the industry, the Minerals Plan must instead be openly and strongly supportive of the natural stone industry and the variety of jobs and skills which is required to enable it to function. The purpose of a Minerals Plan is to provide the framework to enable a viable, valuable and robust natural stone industry to thrive in the county. This chapter on natural building stone fails to do so principally because the Planning Authority appears not to recognise or understand the		Publication MLP paragraph 174 infers scale to be a determinant of sustainability. The text seeks to explain which circumstances (i.e. small-scale working) would potentially justify the acceptability of normally undesirable characteristics – such as protracted timescales and intermittent activity. It is however acknowledged that the text in this regard would benefit from a revision. Furthermore, whilst the content is deemed reasonable, Publication MLP paragraph 176 would benefit from a revision to clarity what is considered to be adequate and appropriate economic evidence.	***avoided, mitigated or justifiably outweighed. An assessment, which identifies and then analyses the significance of any possible economic impacts on businesses that operate locally and those activities could be sensitive to environmental change brought about by proposals for mineral working, will represent credible and valuable evidence in respect of this matter."***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						industry, its importance, its vitality and its needs for the future. Consequently the chapter is unsound as a planning policy.			
794755/11/MW02/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1170897/2/MW02/USND	Respondent	Forest of Dean Stone Firms	No			The purpose of a Minerals Plan is to provide the framework to enable a viable, valuable and robust natural stone industry to thrive in the county. This chapter on natural building stone fails to do so principally because the Planning Authority appears not to recognise or fully understand the industry, its importance, its vitality and its needs for the future. Consequently the chapter is unsound as a planning policy. Paragraph 174 fails to recognise that sustainability is not a function of scale. Whilst some small scale building stone	The policy should acknowledge that local operators such as ourselves are in the forefront of this developing sector and it should encourage related investment to maintain the county's strong position and to promote sustainable growth and capitalise on these natural assets, skills and knowledge base. We have made considerable investment in skills and training much of it nowadays being highly technical and computer based. We employ highly skilled, dedicated, qualified stonemasons and banker-masons. We have invested in	It is the view of the MPA that Publication MLP policy MW02 and its supporting text presents a fair and proportionate approach that contributes to the policy framework for the future management of natural building stone from within Gloucestershire. Numerous references are made in the supporting text to the importance of natural building stone working and the foundation has been laid for justifying its future extraction (see Publication MLP paragraphs 165, 168, 175 and 176). However, any support offered must	**Possible Modifications –** **The final sentence of Publication MLP paragraph 174 to be replaced with;** ***"However, as supported by national policy, a degree of flexibility may be shown when analysing individual proposals for small-scale natural building stone working. On a case by case basis it may be justified for proposals to involve relatively low rates of extraction, periods of intermittent working and as a consequence, relatively longer planning***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						quarries exist it should be recognised that the industry is large scale with a substantial output and large employment centres. They are important for the economic, social and environmental benefits which they import to rural areas of the county and should be recognised and supported, not neglected in policy terms because of a belief that the industry is only small scale. Paragraph 176 mentions the need for skills and training and suggests that a provision for apprenticeship could be significant but, to achieve the investment required from the industry, the Minerals Plan must instead be openly and strongly supportive of the natural stone industry and the variety of jobs and skills which is required to enable it to function thus	specialist plant and machinery. However, unless support through the Minerals Plan is lent to our industry, continued growth, investment in skills and training and new plant and machinery cannot be assumed to automatically occur.	be balanced against the reality that mineral working (including for natural building stone) needs to be proportionately constrained for justified amenity and environmental protection grounds. Furthermore, as pointed to in Publication MLP paragraphs 166 and 167; much of the county's natural building stone resources are in particularly sensitivity localities that must be afforded appropriate levels of protection. Nevertheless, it is acknowledged that some of the supporting text would benefit from a revision for reasons of clarity to assist future applicants as what will be expected of them.	***permission timeframes than would otherwise be anticipated and desirable.'*** **The final two sentences of Publication MLP paragraph 176 to be replaced with;** ***"However, it is equally important to demonstrate how any potential negative economic impacts will be avoided, mitigated or justifiably outweighed. An assessment, which identifies and then analyses the significance of any possible economic impacts on businesses that operate locally and those activities could be sensitive to environmental change brought about by proposals for mineral working, will represent credible and valuable evidence in respect of this matter."***

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						enabling the cost of training apprentices to be funded from production.			
1038720/23/MW02/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
794030/3/MW02/USND	Respondent	Syreford Quarries & Masonry Ltd	No			In paragraph 173 there is a reference to the requirement for a 'sufficiently detailed' Building Stone Assessment (BSA). More clarity should be given as to what this is, what should be provided, and why, and what its purpose is. It is not a requirement of the NPPG. In particular a BSA should not need to be provided for development relating to existing established operations which represent a continuation of their operations or natural expansion. Para 174 fails to recognise that sustainability is not a function of scale. Whilst some small scale building stone quarries exist, it should be		It is the view of the MPA that the approach set out in the supporting text to Publication MLP policy MW02 is balanced and proportionate and compliant with national policy. The specific assessment requirement set out in Publication MLP paragraph 173 represents a fair and consistent methodology for ensuring that proposals are sufficiently well evidenced to be able demonstrate accordance with key policy requirements – principally centred on the 'need' for working to take place. It is strongly contested that the presence of existing working represents any kind of	**Possible Modifications –** **The final sentence of Publication MLP paragraph 174 to be replaced with;** ***"However, as supported by national policy, a degree of flexibility may be shown when analysing individual proposals for small-scale natural building stone working. On a case by case basis it may be justified for proposals to involve relatively low rates of extraction, periods of intermittent working and as a consequence, relatively longer planning permission timeframes than would otherwise be anticipated and***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						recognised that many are large scale with a substantial output and large employment centres. Syreford Quarries & Masonry Limited has two quarries including one with cutting operations and employs 33 people. They are important for the economic, social and environmental benefits which they import to rural areas of the county and should be recognised and supported, not neglected in policy terms because of their size. Paragraph 176 cautiously tip-toes around the need for skills and training and begrudgingly suggests that a provision for apprenticeship could be significant but, to achieve the investment required from the industry, the Minerals Plan must instead be openly and strongly supportive of the natural stone industry and the variety of jobs and		justification in its own right to allow further working to occur. Each proposal must be seen on its own merits taking into account circumstances at the time of the determination. It is also strongly contested that the supporting text under Publication MLP paragraph 174 infers scale to be a determinant of sustainability. The text seeks to explain which circumstances (i.e. small-scale working) would potentially justify the acceptability of normally undesirable characteristics – such as protracted timescales and intermittent activity. It is however acknowledged that the text in this regard would benefit from a revision. Furthermore, whilst the content is deemed reasonable, Publication MLP paragraph 176 would benefit from a revision to clarity what is considered to be adequate and	***desirable.'*** **The final two sentences of Publication MLP paragraph 176 to be replaced with;** ***"However, it is equally important to demonstrate how any potential negative economic impacts will be avoided, mitigated or justifiably outweighed. An assessment, which identifies and then analyses the significance of any possible economic impacts on businesses that operate locally and those activities could be sensitive to environmental change brought about by proposals for mineral working, will represent credible and valuable evidence in respect of this matter."***

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						skills which is required to enable it to function. The purpose of a Minerals Plan is to provide the framework to enable a viable, valuable and robust natural stone industry to thrive in the county. This chapter on natural building stone fails to do so principally because the Planning Authority appears not to recognise or understand the industry, its importance, its vitality and its needs for the future. Consequently the chapter is unsound as a planning policy.		appropriate economic evidence.	
820738/3/MW02/USND	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd	No			In paragraph 173 there is a reference to the requirement for a 'sufficiently detailed' Building Stone Assessment (BSA). More clarity should be given as to what this is, what should be provided, and why, and what its purpose is. It is not a requirement of the NPPG. In particular a BSA should not need to		It is the view of the MPA that the approach set out in the supporting text to Publication MLP policy MW02 is balanced and proportionate and compliant with national policy. The specific assessment requirement set out in Publication MLP paragraph 173 represents a fair and	**Possible Modifications –** **The final sentence of Publication MLP paragraph 174 to be replaced with; *"However, as supported by national policy, a degree of flexibility may be shown when analysing individual proposals for small-scale natural***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						be provided for development relating to existing established operations which represent a continuation of their operations or natural expansion. Para 174 fails to recognise that sustainability is not a function of scale. Whilst some small scale building stone quarries exist, it should be recognised that many are large scale with a substantial output and large employment centres. Cotswold Stone Quarries Ltd with a single quarry and a cutting operation employs nearly 40 people. They are important for the economic, social and environmental benefits which they import to rural areas of the county and should be recognised and supported, not neglected in policy terms because of their size. Paragraph 176 cautiously tip-toes around the need for		consistent methodology for ensuring that proposals are sufficiently well evidenced to be able demonstrate accordance with key policy requirements – principally centred on the 'need' for working to take place. It is strongly contested that the presence of existing working represents any kind of justification in its own right to allow further working to occur. Each proposal must be seen on its own merits taking into account circumstances at the time of the determination. It is also strongly contested that the supporting text under Publication MLP paragraph 174 infers scale to be a determinant of sustainability. The text seeks to explain which circumstances (i.e. small-scale working) would potentially justify the acceptability of normally undesirable characteristics –	***building stone working. On a case by case basis it may be justified for proposals to involve relatively low rates of extraction, periods of intermittent working and as a consequence, relatively longer planning permission timeframes than would otherwise be anticipated and desirable.'*** **The final two sentences of Publication MLP paragraph 176 to be replaced with;** ***"However, it is equally important to demonstrate how any potential negative economic impacts will be avoided, mitigated or justifiably outweighed. An assessment, which identifies and then analyses the significance of any possible economic impacts on businesses that operate locally and those activities could be sensitive***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW02 (paragraphs 165-176) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						skills and training and begrudgingly suggests that a provision for apprenticeship could be significant but, to achieve the investment required from the industry, the Minerals Plan must instead be openly and strongly supportive of the natural stone industry and the variety of jobs and skills which is required to enable it to function. The purpose of a Minerals Plan is to provide the framework to enable a viable, valuable and robust natural stone industry to thrive in the county. This chapter on natural building stone fails to do so principally because the Planning Authority appears not to recognise or understand the industry, its importance, its vitality and its needs for the future. Consequently the chapter is unsound as a planning policy.		such as protracted timescales and intermittent activity. It is however acknowledged that the text in this regard would benefit from a revision. Furthermore, whilst the content is deemed reasonable, Publication MLP paragraph 176 would benefit from a revision to clarity what is considered to be adequate and appropriate economic evidence.	***to environmental change brought about by proposals for mineral working, will represent credible and valuable evidence in respect of this matter."***

Matters related to Policy MW03 | Clay for civil engineering purposes

Publication MLP Consultation Questionnaire Reference | Question 25.1, 25.2, 25.3, 25.4, 25.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW03 | Clay for civil engineering purposes is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW03 | Clay for civil engineering purposes is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1038720/24/MW03/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1164737/24/MW03/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
794755/12/MW03/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound' compliant', is noted.	No modifications are considered necessary in response to the representation.

Matters related to the supporting text to Policy MW03 | Clay for civil engineering purposes

Publication MLP Consultation Questionnaire Reference | Question 26.1, 26.2, 26.3, 26.4, 26.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW03 (paragraphs 177-186) is sound?	No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW03 (paragraphs 177-186) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1038720/25/MW03/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1164737/25/MW03/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Matters related to Policy MW04 | Brick clay

Publication MLP Consultation Questionnaire Reference | Question 27.1, 27.2, 27.3, 27.4, 27.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW04 | Brick clay is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW04 | Brick clay is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1038720/26/MW04/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
852145/8/MW04/SND	Mr Nigel Gibbons	Forest of Dean District Council	Yes			The policy is noted and supported in respect of its purpose of safeguarding brick making in the area		The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1164737/26/MW04/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
794755/13/MW04/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
794035/3/MW04/SND	Mr Dale Moss	Northcot Brick Ltd	Yes		Yes	Policy MW04 – Brick Clay Paragraph 145 of the NPPF requires local planning authorities to plan for a steady and adequate supply of industrial materials by (inter alia) providing a stock of permitted reserves to support the level of actual and proposed investment required		The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW04 | Brick clay is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW04 | Brick clay is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						for new or existing plant and the maintenance and improvement of existing plant and equipment for at least 25 years for brick clay. Policy MW04 has been prepared in accordance with the NPPF in this regard. We are supportive of Policy MW04 which allows for mineral development proposals for working of brick clays as an industrial mineral, providing it can be demonstrated that a contribution will be made towards the supply of brick clays necessary to enable production to be maintained at a specified brickworks either located within Gloucestershire or beyond for at least 25 years throughout and at the end of the plan period; and a positive contribution will be made to sustaining or growing local economies and upholding cultural heritage throughout Gloucestershire.			

Matters related to the Supporting text to Policy MW04 | Brick clay

Publication MLP Consultation Questionnaire Reference | Question 28.1, 28.2, 28.3, 28.4, 28.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW04 (paragraphs 187-193) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW04 (paragraphs 187-193) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1038720/27/MW04/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1164737/27/MW04/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
794035//4/MW04/SND	Mr Dale Moss	Northcot Brick Ltd	Yes			The mineral resource at Wellacre Quarry, associated with Northcot Brick, is nearing exhaustion and it is our client's intention to submit a planning application in the near future for an extension to the quarry so that the production of bricks by this locally and nationally important company can continue. The location of the proposed extension at Northcot Brick Works is adjacent to the existing quarry/brick work operations, and within the area designated within the draft Minerals Local Plan as a 'Mineral		The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW04 (paragraphs 187-193) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW04 (paragraphs 187-193) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Resource Area for Brick and Clay'. A plan showing the extension area is attached. At paragraph 189 the draft Mineral Local Plan explains that whilst Gloucestershire is not a significant contributor by volume to the UK's manufacturing of structural brick clay products, there are two local brickwork that have an important role to play in the security and diversity of supply. Northcot Brick is one of these. The draft Mineral Local Plan goes on to state that permitted brick reserved and stockpiles of worked minerals are currently judged to be adequate to support the continued manufacturing of structural brick clay products at the local level, however forecast growth in coming years could stimulate a change in circumstances and will need to be closely monitored.			

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW04 (paragraphs 187-193) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW04 (paragraphs 187-193) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Paragraph 190 explains that the general downward trend in the number of brickworks present in the UK over recent decades is partly down to the high cost of start-up and operation of plants and the increasing dependence on primary materials that are predicable in their availability and degree of consistency. The proposed development at Northcot Brick would provide a local continuity of supply, as opposed to transporting materials from elsewhere to the brickworks which is a more sustainable approach.			

Matters related to Policy MW05 | Coal

Publication MLP Consultation Questionnaire Reference | Questions 29.1, 29.2, 29.3, 29.4, 29.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW05 | Coal is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW05 | Coal is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1038720/28/MW05/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
852145/9/MW05/USND	Mr Nigel Gibbons	Forest of Dean District Council	No	(2) Not justified (4) Not consistent with national policy		The original wording of the policy in 2016 with its stance of not permitting coal working is considered preferable on condition that the small scale traditional mines are able to continue. The various considerations and safeguards are noted. Overall it is considered very unlikely that even if there were a requirement, coal extraction of a significant scale from the FoD would be appropriate or environmentally acceptable. This is especially apparent when the various considerations referred to in the MLP both in the section related to coal extraction and in the general DM	Policy MW05 Coal should be re worded as the following suggestion: "Minerals development proposals for coal working will not be permitted unless..." or " Mineral development proposals for coal working will only be permitted where It can be demonstrated: - I. they are environmentally acceptable; or II. national or in the case of proposals for small scale traditional working local benefits to the communities of the Forest of Dean will be provided, which clearly outweigh the likely impacts to justify the grant of planning permission.	It is the view of the MPA that the Publication MLP Coal policy is NPPF complaint. It represents an agreeable position with the Coal Authority following a re-drafting exercise instigated by the representations received to the Draft MLP. Former national policy, which was set out in Minerals Planning Guidance (MPG) 3 did contained a presumption again coal extraction. However this approach was not taken forward in the NPPF. As a consequence any negatively worded policy as suggested in the representation is now considered to be inappropriate and contrary to national policy.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW05 | Coal is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW05 | Coal is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						policies are applied. The proposed change shown below closely follows para 149 of the NPPF (2012). It more closely reflects the effect of considering the various environmental constraints that apply across the Forest of Dean.			
1164737/28/MW05/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Matters related to the supporting text to Policy MW05 | Coal

Publication MLP Consultation Questionnaire Reference | Questions 30.1, 30.2, 30.3, 30.4, 30.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW05 (paragraphs 194-209) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW05 (paragraphs 194-209) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
852145/10/MW05/USND	Mr Nigel Gibbons	Forest of Dean District Council	No	(3) Not effective		May need changes as a consequence of the revised policy which is suggested especially to illustrate the environmental and other constraints which will apply and which justify the policy change. A brief addition regarding the traditional small scale working of coal may also be necessary.		It is the view of MPA that no modifications to the supporting text to Policy MW05 are required as no policy modifications are being proposed. Furthermore, numerous references have been made to the local circumstances surrounding the small-scale, free-mining traditions of the Forest of Dean including within both the reasoned justification for the policy and policy interpretation and implementation (see Publication MLP paragraphs 195, 204 and 208).	No modifications are considered necessary in response to the representation.
1164737/29/MW05/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be ‘sound’ and ‘legally compliant’, is noted.	No modifications are considered necessary in response to the representation.
1038720/29/MW05/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be ‘sound’ and ‘legally compliant’, is noted.	No modifications are considered necessary in response to the representation.
794755/14/MW05/SND	Mr Rob	Strategic Policy & Specialist Advice	Yes					The representation, which considers this	No modifications are considered

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW05 (paragraphs 194-209) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW05 (paragraphs 194-209) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
	Levenston	Team South Gloucestershire Council						matter to be ‘sound’ compliant’, is noted.	necessary in response to the representation.

Matters related to Policy MW06 | Ancillary Minerals Development

Publication MLP Consultation Questionnaire Reference | Questions 31.1, 31.2, 31.3, 31.4, 31.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW06 | Ancillary minerals development is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW06 | Ancillary minerals development is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
808023/9/MW06/COM	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd				Policy MW06 – Policy should acknowledge that ancillary development could include waste related development such as C&D waste recycling and recovery. What does this mean in real terms in say context of a bagging plant ? “a positive contribution will be made to sustaining or growing the local economy and upholding cultural heritage throughout Gloucestershire”		It is the view of the MPA that Publication MLP Policy MW06 appropriately covers the issue of ancillary development associated with mineral activities. The policy itself does not specify or exclude particular activities as the decision concerning what is or isn’t an ancillary activity is best made on a case-by-case basis taking into account site and operational specific circumstances. The recycling of construction & demolition wastes is already afforded local policy coverage under the Adopted Gloucestershire Waste Core Strategy Core Policy WCS4. Whilst this kind of activity could be ancillary to mineral extraction it isn’t always going to be the case and therefore shouldn’t be included as such. Furthermore, the	**Possible Modification –** **Under point V. introduce *‘/ or’* after *‘…sustaining or growing the local economy and…’***

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW06 | Ancillary minerals development is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW06 | Ancillary minerals development is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								economic case associated with ancillary development is an important part of the planning balance for justifying a proposal and evidence to this effect should be provided. However, it is recognised that the Publication MLP policy wording for MW06 could benefit from a slight revision to acknowledge that different types of ancillary development may generate different desirable benefits that go beyond basic direct employment and stray into wider cultural and other indirect opportunities.	
1038720/30/MW06/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
794030/4/MW06/USND	Respondent	Syreford Quarries & Masonry Ltd	No			Policy MW06 | Ancillary minerals development New sites they are well planned and screened with limited impacts and may represent a large capital investment on		It is the view of the MPA that Publication MLP Policy MW06 appropriately covers the issue of ancillary development associated with mineral activities. It would be	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW06 | Ancillary minerals development is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW06 | Ancillary minerals development is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						a site. Amenity and traffic impacts will have been addressed and many existing sites supply long established local markets. MW06 should be expanded to provide positive support to retaining ancillary development at the end of a site's life, subject to a further planning application considering relevant planning constraints, acknowledging potential sustainability benefits of retaining elements of mineral development after cessation of quarrying.		inappropriate for local mineral policies to go beyond their sphere of influence and make a presumption about the longer term, permanent acceptability of a standalone industrial activity – often in a rural locality. This is a matter that would need to be dealt with by the relevant district local planning authority within Gloucestershire.	
820738/4/MW06/USND	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd	No			Policy MW06 | Ancillary minerals development New sites they are well planned and screened with limited impacts and may represent a large capital investment on a site. Amenity and traffic impacts will have been addressed and many existing sites supply long established local markets. MW06 should be expanded		It is the view of the MPA that Publication MLP Policy MW06 appropriately covers the issue of ancillary development associated with mineral activities. It would be inappropriate for local mineral policies to go beyond their sphere of influence and make a presumption about the longer term, permanent	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW06 | Ancillary minerals development is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW06 | Ancillary minerals development is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						to provide positive support to retaining ancillary development at the end of a site's life, subject to a further planning application considering relevant planning constraints, acknowledging potential sustainability benefits of retaining elements of mineral development after cessation of quarrying.		acceptability of a standalone industrial activity – often in a rural locality. This is a matter that would need to be dealt with by the relevant district local planning authority within Gloucestershire.	
1164737/30/MW06/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
794755/15/MW06/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound' compliant', is noted.	No modifications are considered necessary in response to the representation.
793504/4/MW06/USND		Stanway Stone Company	No			Policy MW06 | Ancillary minerals development New sites they are well planned and screened with limited impacts and may represent a large capital investment on a site. Amenity and traffic impacts will have been addressed and many		It is the view of the MPA that Publication MLP Policy MW06 appropriately covers the issue of ancillary development associated with mineral activities. It would be inappropriate for local mineral policies to go beyond their sphere of influence	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW06 | Ancillary minerals development is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW06 | Ancillary minerals development is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						existing sites supply long established local markets. MW06 should be expanded to provide positive support to retaining ancillary development at the end of a site's life, subject to a further planning application considering relevant planning constraints, acknowledging potential sustainability benefits of retaining elements of mineral development after cessation of quarrying.		and make a presumption about the longer term, permanent acceptability of a standalone industrial activity – often in a rural locality. This is a matter that would need to be dealt with by the relevant district local planning authority within Gloucestershire.	
793547/3/MW06/USND	Respondent	Elliott and Sons Ltd	No			If it is permissible under point II for minerals to be imported from elsewhere as it represents an environmentally acceptable and sustainable option why should the permission need to be temporary? (as required by criteria III - all operations will be for a temporary period of time restricted to the life of the mineral site in which they are located and the removal of all built		It is the view of the MPA that Publication MLP Policy MW06 appropriately covers the issue of ancillary development associated with mineral activities. It would be inappropriate for local mineral policies to go beyond their sphere of influence and make a presumption about the longer term, permanent acceptability of a standalone industrial activity – often in a rural locality. This is	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW06 | Ancillary minerals development is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW06 | Ancillary minerals development is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						structures will occur at the earliest opportunity once mineral working has ceased). Criteria III seems to contradict criteria II and should be reworded to reflect situations where the permanent structures will not cause harm and represent an environmentally acceptable and sustainable option.		a matter that would need to be dealt with by the relevant district local planning authority within Gloucestershire.	
793895/4/MW06/USND	Respondent	Cotswold Stone Quarries	No			Policy MW06 | Ancillary minerals development New sites they are well planned and screened with limited impacts and may represent a large capital investment on a site. Amenity and traffic impacts will have been addressed and many existing sites supply long established local markets. MW06 should be expanded to provide positive support to retaining ancillary development at the end of a site's life, subject to a further planning application considering relevant planning constraints,		It is the view of the MPA that Publication MLP Policy MW06 appropriately covers the issue of ancillary development associated with mineral activities. It would be inappropriate for local mineral policies to go beyond their sphere of influence and make a presumption about the longer term, permanent acceptability of a standalone industrial activity – often in a rural locality. This is a matter that would need to be dealt with by the relevant district local planning authority within	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MW06 | Ancillary minerals development is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MW06 | Ancillary minerals development is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						acknowledging potential sustainability benefits of retaining elements of mineral development after cessation of quarrying.		Gloucestershire.	

Matters related to the supporting text to Policy MW06 | Ancillary Minerals Development

Publication MLP Consultation Questionnaire Reference | Questions 32.1, 32.2, 32.3, 32.4, 32.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW06 (paragraphs 210-218) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW06 (paragraphs 210-218) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
924705/5/MW06/USND	Respondent	Head of Estates & Planning Breedon Aggregates	No			Policy MW06 - Ancillary minerals development. There may be times when it is desirable for ancillary development to be retained to serve local markets after the mineral reserves have been exhausted. This policy clearly excludes the ability to do this and should be amended accordingly.	This policy should allow ancillary development to be retained subject to the submission of the demonstration of need/benefit and acceptable environmental impact and the grant of planning permission.	It is the view of the MPA that Publication MLP Policy MW06 and the supporting text appropriately cover the issue of ancillary development associated with mineral activities. It would be inappropriate for local mineral policies and / or the supporting text to go beyond their sphere of influence and make a presumption about the longer term, permanent acceptability of a standalone industrial activity – often in a rural locality. This is a matter that would need to be dealt with by the relevant district local planning authority within Gloucestershire.	No modifications are considered necessary in response to the representation.
1038720/31/MW06/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be ‘sound’ and ‘legally compliant’, is noted.	No modifications are considered necessary in response to the representation.
794030/5/MW06/USND	Respondent	Syreford Quarries & Masonry Ltd	No			Concern is expressed about the text reference in para	Para 213 (the reference to Policy MW07 needs to be	It is the view of the MPA that the supporting text to	**Possible Modifications –**

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW06 (paragraphs 210-218) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW06 (paragraphs 210-218) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						212 to the 'undesirable sense of permanency' in relation to ancillary plant. This is a highly subjective comment and seems to relate to existing operations. It should be removed. New ancillary development will either require an application in its own right which can appropriately address temporary/permanency issues or it will be covered by the provisions of the General Permitted Development Order which are time limited. Paragraph 212 discusses removing permitted development rights for ancillary development in a wholescale fashion which is inappropriate and should be removed. Permitted development rights should not be automatically removed, which is in line with national guidance. Applying for development that would otherwise be	corrected).	Publication MLP Policy MW06 provides a robust and reasoned justification for including a policy on this matter and a clear interpretation and local guidance concerning its implementation. It is contested that the policy approach advocated is not proportionate. It is also deemed wholly appropriate for the supporting text to elaborate on the evidence requirements. It is vitally important to the policy consideration that applicants are able to justify introducing industrial activities, which would otherwise unlikely receive permission. The request to undertake a comparative analysis under Publication MLP paragraph 217 is justified within the context set in the text – *'where existing, permitted alternative arrangements are potentially available nearby…'* This should form part of the demonstration of	**Replace the reference to *'Policy MW07'* with *'Policy MW06'* under Publication MLP paragraph 213.** **Add the wording to Publication MLP paragraph 217: - *'…for ancillary minerals development proposals involving the importation of minerals,'* after *'A comparative analysis will be required…'* and before *'where existing, permitted alternative arrangements are potentially available nearby.'***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW06 (paragraphs 210-218) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW06 (paragraphs 210-218) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						permitted development introduces delay and uncertainty to minerals operations and stifles economic growth as well as generating unnecessary work for the Council when resources are limited. There should be a more measured approach considering if it is necessary to remove permitted development rights and if so if only limited removal of permitted development rights would be appropriate e.g. have an identified plant site location where permitted development rights could be retained with other areas subject to the removal of permitted development rights. Paragraphs 214 and 217 are unnecessary and represent an excessive level of detail. It is patently obvious that there are clear benefits by locating minerals development at its 'source' maximising the use of site		a 'sustainable option' as indicated in point II of Publication MLP policy MW06. However, it is acknowledged that the supporting text would benefit from additional wording to better link it to the policy requirements.	

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW06 (paragraphs 210-218) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW06 (paragraphs 210-218) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						infrastructure including skilled staff, minimising traffic movements and enhancing the overall viability of an operation. A comparative analysis should not be required, it is not detailed in the policy itself. This presents a further unnecessary burden with consideration such as alternatives being highly subjective in natures. A comparative analysis would not be required for general industrial development and it is inappropriate to do so purely because it is a minerals development. This also runs counter to general economic development policies found in district council planning documents which typically reinforce further development of existing business/sites, where complying with general policies. Quarries should be treated in a similar manner as they represent centres of economic activity			

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW06 (paragraphs 210-218) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW06 (paragraphs 210-218) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						and they should not have to provide extensive justification for further mineral related development which in any other circumstance would be viewed as a natural extension of the business.			
820738/5/MW06/USND	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd	No			Concern is expressed about the text reference in para 212 to the 'undesirable sense of permanency' in relation to ancillary plant. This is a highly subjective comment and seems to relate to existing operations. It should be removed. New ancillary development will either require an application in its own right which can appropriately address temporary/permanency issues or it will be covered by the provisions of the General Permitted Development Order which are time limited. Paragraph 212 discusses removing permitted development rights for ancillary	Para 213 (the reference to Policy MW07 needs to be corrected).	It is the view of the MPA that the supporting text to Publication MLP Policy MW06 provides a robust and reasoned justification for including a policy on this matter and a clear interpretation and local guidance concerning its implementation. It is contested that the policy approach advocated is not proportionate. It is also deemed wholly appropriate for the supporting text to elaborate on the evidence requirements. It is vitally important to the policy consideration that applicants are able to justify introducing industrial activities, which would otherwise unlikely receive permission.	**Possible Modifications –** **Replace the reference to *'Policy MW07'* with *'Policy MW06'* under Publication MLP paragraph 213.** **Add the wording to Publication MLP paragraph 217: - *'…for ancillary minerals development proposals involving the importation of minerals,'* after '*A comparative analysis will be required…'* and before *'where existing, permitted alternative arrangements are potentially available nearby.'***

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						development in a wholescale fashion which is inappropriate and should be removed. Permitted development rights should not be automatically removed, which is in line with national guidance. Applying for development that would otherwise be permitted development introduces delay and uncertainty to minerals operations and stifles economic growth as well as generating unnecessary work for the Council when resources are limited. There should be a more measured approach considering if it is necessary to remove permitted development rights and if so if only limited removal of permitted development rights would be appropriate e.g. have an identified plant site location where permitted development rights could be retained with other areas		The request to undertake a comparative analysis under Publication MLP paragraph 217 is justified within the context set in the text – *'where existing, permitted alternative arrangements are potentially available nearby…'* This should form part of the demonstration of a 'sustainable option' as indicated in point II of Publication MLP policy MW06. However, it is acknowledged that the supporting text would benefit from additional wording to better link it to the policy requirements.	

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW06 (paragraphs 210-218) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW06 (paragraphs 210-218) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						subject to the removal of permitted development rights. Paragraphs 214 and 217 are unnecessary and represent an excessive level of detail. It is patently obvious that there are clear benefits by locating minerals development at its 'source' maximising the use of site infrastructure including skilled staff, minimising traffic movements and enhancing the overall viability of an operation. A comparative analysis should not be required, it is not detailed in the policy itself. This presents a further unnecessary burden with consideration such as alternatives being highly subjective in natures. A comparative analysis would not be required for general industrial development and it is inappropriate to do so purely because it is a minerals development. This also runs counter to general economic development policies			

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MW06 (paragraphs 210-218) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MW06 (paragraphs 210-218) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						found in district council planning documents which typically reinforce further development of existing business/sites, where complying with general policies. Quarries should be treated in a similar manner as they represent centres of economic activity and they should not have to provide extensive justification for further mineral related development which in any other circumstance would be viewed as a natural extension of the business.			
1164737/31/MW06/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
793504/5/MW06/USND		Stanway Stone Company	No			Concern is expressed about the text reference in para 212 to the 'undesirable sense of permanency' in relation to ancillary plant. This is a highly subjective comment and seems to relate to existing operations. It should be removed. New ancillary	Para 213 (the reference to Policy MW07 needs to be corrected).	It is the view of the MPA that the supporting text to Publication MLP Policy MW06 provides a robust and reasoned justification for including a policy on this matter and a clear interpretation and local guidance concerning its implementation. It is	**Possible Modifications –** **Replace the reference to *'Policy MW07'* with *'Policy MW06'* under Publication MLP paragraph 213.** **Add the wording to Publication MLP paragraph 217: - *'…for ancillary***

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						development will either require an application in its own right which can appropriately address temporary/permanency issues or it will be covered by the provisions of the General Permitted Development Order which are time limited. Paragraph 212 discusses removing permitted development rights for ancillary development in a wholescale fashion which is inappropriate and should be removed. Permitted development rights should not be automatically removed, which is in line with national guidance. Applying for development that would otherwise be permitted development introduces delay and uncertainty to minerals operations and stifles economic growth as well as generating unnecessary work for the Council when resources are		contested that the policy approach advocated is not proportionate. It is also deemed wholly appropriate for the supporting text to elaborate on the evidence requirements. It is vitally important to the policy consideration that applicants are able to justify introducing industrial activities, which would otherwise unlikely receive permission. The request to undertake a comparative analysis under Publication MLP paragraph 217 is justified within the context set in the text – *'where existing, permitted alternative arrangements are potentially available nearby…'* This should form part of the demonstration of a 'sustainable option' as indicated in point II of Publication MLP policy MW06. However, it is acknowledged that the supporting text would benefit from additional wording to better link it to the policy requirements.	***minerals development proposals involving the importation of minerals,'*** **after** ***'A comparative analysis will be required…'*** **and before** ***'where existing, permitted alternative arrangements are potentially available nearby.'***

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						limited. There should be a more measured approach considering if it is necessary to remove permitted development rights and if so if only limited removal of permitted development rights would be appropriate e.g. have an identified plant site location where permitted development rights could be retained with other areas subject to the removal of permitted development rights. Paragraphs 214 and 217 are unnecessary and represent an excessive level of detail. It is patently obvious that there are clear benefits by locating minerals development at its 'source' maximising the use of site infrastructure including skilled staff, minimising traffic movements and enhancing the overall viability of an operation. A comparative analysis should not be required, it is not detailed in the policy			

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						itself. This presents a further unnecessary burden with consideration such as alternatives being highly subjective in natures. A comparative analysis would not be required for general industrial development and it is inappropriate to do so purely because it is a minerals development. This also runs counter to general economic development policies found in district council planning documents which typically reinforce further development of existing business/sites, where complying with general policies. Quarries should be treated in a similar manner as they represent centres of economic activity and they should not have to provide extensive justification for further mineral related development which in any other circumstance would be viewed as a natural extension of the business.			

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793547/4/MW06/USND	Respondent	Elliott and Sons Ltd	No			A comparative analysis should only be triggered where the development will cause harm.		It is the view of the MPA that the request to undertake a comparative analysis under Publication MLP paragraph 217 is justified within the context set in the text – *'where existing, permitted alternative arrangements are potentially available nearby…'* This should form part of the demonstration of a 'sustainable option' as indicated in point II of Publication MLP policy MW06. However, it is acknowledged that the supporting text would benefit from additional wording to better link it to the policy requirements.	**Possible Modification –** **Add the wording to Publication MLP paragraph 217: -** ***'…for ancillary minerals development proposals involving the importation of minerals,'*** **after '*A comparative analysis will be required…'* and before *'where existing, permitted alternative arrangements are potentially available nearby.'***
793895/5/MW06/USND	Respondent	Cotswold Stone Quarries	No			Concern is expressed about the text reference in para 212 to the 'undesirable sense of permanency' in relation to ancillary plant. This is a highly subjective comment and seems to relate to existing operations. It should be removed. New ancillary development will either require an application in its own	Para 213 (the reference to Policy MW07 needs to be corrected	It is the view of the MPA that the supporting text to Publication MLP Policy MW06 provides a robust and reasoned justification for including a policy on this matter and a clear interpretation and local guidance concerning its implementation. It is contested that the policy approach advocated is not	**Possible Modifications –** **Replace the reference to *'Policy MW07'* with *'Policy MW06'* under Publication MLP paragraph 213.** **Add the wording to Publication MLP paragraph 217: -** ***'…for ancillary minerals development proposals involving***

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						right which can appropriately address temporary/permanency issues or it will be covered by the provisions of the General Permitted Development Order which are time limited. Paragraph 212 discusses removing permitted development rights for ancillary development in a wholescale fashion which is inappropriate and should be removed. Permitted development rights should not be automatically removed, which is in line with national guidance. Applying for development that would otherwise be permitted development introduces delay and uncertainty to minerals operations and stifles economic growth as well as generating unnecessary work for the Council when resources are limited. There should be a more measured approach		proportionate. It is also deemed wholly appropriate for the supporting text to elaborate on the evidence requirements. It is vitally important to the policy consideration that applicants are able to justify introducing industrial activities, which would otherwise unlikely receive permission. The request to undertake a comparative analysis under Publication MLP paragraph 217 is justified within the context set in the text – *'where existing, permitted alternative arrangements are potentially available nearby…'* This should form part of the demonstration of a 'sustainable option' as indicated in point II of Publication MLP policy MW06. However, it is acknowledged that the supporting text would benefit from additional wording to better link it to the policy requirements.	***the importation of minerals,'*** **after '*A comparative analysis will be required…'* and before *'where existing, permitted alternative arrangements are potentially available nearby.'***

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						considering if it is necessary to remove permitted development rights and if so if only limited removal of permitted development rights would be appropriate e.g. have an identified plant site location where permitted development rights could be retained with other areas subject to the removal of permitted development rights. Paragraphs 214 and 217 are unnecessary and represent an excessive level of detail. It is patently obvious that there are clear benefits by locating minerals development at its 'source' maximising the use of site infrastructure including skilled staff, minimising traffic movements and enhancing the overall viability of an operation. A comparative analysis should not be required, it is not detailed in the policy itself. This presents a further unnecessary burden with			

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						consideration such as alternatives being highly subjective in natures. A comparative analysis would not be required for general industrial development and it is inappropriate to do so purely because it is a minerals development. This also runs counter to general economic development policies found in district council planning documents which typically reinforce further development of existing business/sites, where complying with general policies. Quarries should be treated in a similar manner as they represent centres of economic activity and they should not have to provide extensive justification for further mineral related development which in any other circumstance would be viewed as a natural extension of the business.			
802358/4/MW06/USND	Respondent	Smiths (Gloucester) Ltd	No			Policy MW06 | Ancillary minerals development	Para 213 (the reference to Policy MW07 needs to be	It is the view of the MPA that the supporting text to	**Possible Modifications –**

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						New sites they are well planned and screened with limited impacts and may represent a large capital investment on a site. Amenity and traffic impacts will have been addressed and many existing sites supply long established local markets. MW06 should be expanded to provide positive support to retaining ancillary development at the end of a site's life, subject to a further planning application considering relevant planning constraints, acknowledging potential sustainability benefits of retaining elements of mineral development after cessation of quarrying. Concern is expressed about the text reference in para 212 to the 'undesirable sense of permanency' in relation to ancillary plant. This is a highly subjective comment and seems to relate to existing operations. It should be removed. New	corrected).	Publication MLP Policy MW06 provides a robust and reasoned justification for including a policy on this matter and a clear interpretation and local guidance concerning its implementation. It is contested that the policy approach advocated is not proportionate. It is also deemed wholly appropriate for the supporting text to elaborate on the evidence requirements. It is vitally important to the policy consideration that applicants are able to justify introducing industrial activities, which would otherwise unlikely receive permission. The request to undertake a comparative analysis under Publication MLP paragraph 217 is justified within the context set in the text – *'where existing, permitted alternative arrangements are potentially available nearby…'* This should form part of the demonstration of	**Replace the reference to *'Policy MW07'* with *'Policy MW06'* under Publication MLP paragraph 213.** **Add the wording to Publication MLP paragraph 217: - *'…for ancillary minerals development proposals involving the importation of minerals,'* after *'A comparative analysis will be required…'* and before *'where existing, permitted alternative arrangements are potentially available nearby.'***

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						ancillary development will either require an application in its own right which can appropriately address temporary/permanency issues or it will be covered by the provisions of the General Permitted Development Order which are time limited. Paragraph 212 discusses removing permitted development rights for ancillary development in a wholescale fashion which is inappropriate and should be removed. Permitted development rights should not be automatically removed, which is in line with national guidance. Applying for development that would otherwise be permitted development introduces delay and uncertainty to minerals operations and stifles economic growth as well as generating unnecessary work for the Council when		a 'sustainable option' as indicated in point II of Publication MLP policy MW06. However, it is acknowledged that the supporting text would benefit from additional wording to better link it to the policy requirements.	

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						resources are limited. There should be a more measured approach considering if it is necessary to remove permitted development rights and if so if only limited removal of permitted development rights would be appropriate e.g. have an identified plant site location where permitted development rights could be retained with other areas subject to the removal of permitted development rights. Paragraphs 214 and 217 are unnecessary and represent an excessive level of detail. It is patently obvious that there are clear benefits by locating minerals development at its 'source' maximising the use of site infrastructure including skilled staff, minimising traffic movements and enhancing the overall viability of an operation. A comparative analysis should not be required, it is not			

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						detailed in the policy itself. This presents a further unnecessary burden with consideration such as alternatives being highly subjective in natures. A comparative analysis would not be required for general industrial development and it is inappropriate to do so purely because it is a minerals development. This also runs counter to general economic development policies found in district council planning documents which typically reinforce further development of existing business/sites, where complying with general policies. Quarries should be treated in a similar manner as they represent centres of economic activity and they should not have to provide extensive justification for further mineral related development which in any other circumstance would be viewed as a natural extension of the business.			

Matters related to Policy MA01 | Aggregate working within allocations

Publication MLP Consultation Questionnaire Reference | Questions 33.1, 33.2, 33.3, 33.4, 33.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MA01 | Aggregate working within allocations is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MA01 | Aggregate working within allocations is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1028219/13/MA01/USND	Ms Nicola Packer		No	(1) Not positively prepared (2) Not justified		Allocation 01 Land east of Stowe Hill - planning applications for this have been refused because the local authority has looked at the implications. If this plan were prepared in line with it's own stated principles in previous sections then this land would not be included in the plan.	Omit Allocation 01 Land east of Stowe Hill.	It is the view of the MPA that Publication MLP Policy MA01 should be revised in light of evidence received during the publication consultation stage relating to the deliverability of one of the plan's allocations.	**Possible Modification –** **Remove the reference to *"Allocation 01: Land east of Stowe Hill Quarry…"* and re-number the remaining allocations accordingly.**
808023/10/MA01/SND	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd	Yes			Policy MA01 – support for including Down Ampney allocation / preferred area.		The MPA acknowledges the support afforded to Publication MLP Allocation 6: Land southeast of Down Ampney.	No modifications are considered necessary in response to the representation.
855353/18/MA01/USND	Chris McFarling		No	(1) Not positively prepared (2) Not justified (3) Not effective (4) Not consistent with national policy	No	Allocation 01: Stowwe Hill Quarry. Continued inclusion of the site for aggregate extraction will harm the Slade Brook SSSI. viz NE and EA objections.	Remove the site from the plan.	It is the view of the MPA that Publication MLP Policy MA01 should be revised in light of evidence received during the publication consultation stage relating to the deliverability of one of the plan's allocations.	**Possible Modification –** **Remove the reference to *"Allocation 01: Land east of Stowe Hill Quarry…"* and re-number the remaining allocations accordingly.**
1038720/32/MA01/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MA01 | Aggregate working within allocations is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MA01 | Aggregate working within allocations is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1116790/2/MA01/USND	Respondent	Senior Advisor - Sustainable Development Natural England	No	(1) Not positively prepared (2) Not justified (3) Not effective (4) Not consistent with national policy		We consider that the Publication Plan is unsound with regards to Policy MA01 and Allocation 1, Land East of Stowe Hill Quarry. We do not agree with the conclusions set out in Policy MA01 and Allocation 1 Land east of Stowe HIll Quarry. Our key concerns are outlined below and are specific to the allocation at Stowe Hill Quarry: - Principle of mineral working for Stowe Hill Quarry has not been accepted, as stated within Policy MA01 and Allocation 1 - The current allocation site for Stowe Hill Quarry is considered to be high risk due to the hydrological links to Slade Brook SSSI - Reservations regarding the viability and deliverability of the allocation at Stowe Hill Quarry - The monitoring of the proposal would not adequately prevent any impacts from occurring - The adequacy and effectiveness of the proposed restoration scheme as a form of mitigation - The mitigation as currently stated with the Minerals Plan is now considered our of date - Natural England objection to the most recent planning application is still outstanding, and highlights issues of deliverability Further details regarding these issues have been provided in Appendix 1 Natural England considers that the Minerals Plan does not meet the current tests of soundness as it is not justified or effective and is not consistent with national		It is the view of the MPA that Publication MLP Policy MA01 should be revised in light of evidence received during the publication consultation stage relating to the deliverability of one of the plan's allocations.	**Possible Modification –** **Remove the reference to *"Allocation 01: Land east of Stowe Hill Quarry…"* and re-number the remaining allocations accordingly.**

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MA01 | Aggregate working within allocations is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MA01 | Aggregate working within allocations is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						policy with regard to its allocation at Stowe Hill Quarry (MA01). Allocation MA01 could lead to significant adverse impacts on Slade Brook Site of Special Scientific Interest (SSSI). Slade Brook SSSI is designated for its activelyforming tufa dams; this is a complex process which relies on hydrological, chemical and geological factors. Natural England has outstanding objections to planning applications to extend the Stowe Hill Quarry. Fundamentally, there is a high level of risk to the SSSI with no realistic mitigation option available . It is our view that extending Stowe Hill Quarry poses an unacceptable risk to Slade Brook SSSI. We therefore believe that the inclusion of MA01 in the Minerals Plan makes the plan unsound, and calls its viability into question. Our detailed reasons for objecting to the Stowe Hill Quarry extension are set out in the annex below. In summary they are, 1. Monitoring is not able to protect Slade Brook SSSI as it will not give adequate forewarning before the SSSI features are affected 2. The proposed restoration scheme is untested and hence we do not have confidence that it will work. The Minerals Plan states that the principle of minerals working for			

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						aggregates at Stowe Hill has been accepted. We wish to clarify that the principle of extending the existing site has not been accepted. We have outstanding objections on the previous and current applications to expand the existing quarry, as the proposals would be likely to result in significant and likely irreversible damage to Slade Brook SSSI. It is our view that expansion may not be possible, and is therefore not an accepted principle. The logistical ease of acquiring minerals by extending this site should not override the environmental impacts and the importance of protecting Slade Brook SSSI. The allocation in the Minerals Plan is out of date. The planning applications to extend Stowe Hill Quarry have been progressing in advance of the Minerals Plan process. Allocation MA01 at Stowe Hill Quarry is the original proposed development size, as put forward in planning application 15/0108/FDMAJM in 2017. Natural England objected to this proposal, and the planning application remains undetermined. Our response to this application is attached. Since then a proposal for a smaller extension was put forward. Natural England also objected to this proposal. Our response to this application 17/0122/FDMAJM is also attached. As a minimum, the size of the current allocation in the Minerals Plan needs to be reduced to reflect the most recent proposals. However, it should be			

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						noted that even if the allocation is reduced in size, we would not support its inclusion in the plan. Fundamentally, the risk to the SSSI is too great to support the inclusion of this allocation in the Plan. Soundness National Planning Policy Framework, paragraph 35 outlines the tests of soundness for a Local Plan. We do not feel that the Minerals Plan, as it currently stands, meets these tests of soundness: Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence; We do not consider the Plan to be justified. Allocation MA01 poses unacceptable risks to Slade Brook SSSI. It is therefore our view that an alternative strategy with less environmental impact should be considered. It is not clear what alternatives have been considered. Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; We do not consider the plan to be effective. Allocation MA01 is not likely to meet the Plan's objectives. In addition, Allocation MA01 is unlikely to get planning permission due to the impacts it poses to Slade Brook SSSI. Therefore the plan is not deliverable. Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.			

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MA01 | Aggregate working within allocations is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MA01 | Aggregate working within allocations is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						The National Planning Policy Framework (NPPF) states in paragraph 175 that: b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest It is clear that extending Stowe Hill Quarry poses a high level of risk to Slade Brook SSSI, and that this cannot be adequately avoided, mitigated or repaired. The NPPF states that in this situation, a proposal should not normally be permitted. The NPPF goes on to state in paragraph 204, Chapter 17 – Facilitating the use of Sustainable Minerals, that planning policies should: (f) set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health, taking into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality; And (h) ensure that worked land is reclaimed at the earliest opportunity, taking account of			

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						aviation safety, and that high quality restoration and aftercare of mineral sites takes place. It is our view that Allocation MA01 / the proposed extension of Stowe Hill Quarry has an "unacceptable adverse impact on the natural … environment" and therefore does not meet with point F. As the existing quarry site is yet to be restored, the restoration proposed for the extension is untested and does not meet point H. The Minerals Local Plan includes a proposed extension to an existing quarry at Stowe Hill, allocation MA01. Natural England has outstanding objections to two planning applications for extensions on this site due to the likely significant and irreversible impacts on Slade Brook SSSI. In our objections, we have raised concerns around the ability of monitoring to adequately protect the SSSI, and the ability of site restoration to ensure the long-term functioning of the SSSI. Overcoming our concerns may be technically difficult, and could jeopardise the viability of the proposed extension. We therefore conclude that with the inclusion of MA01 in the Minerals Plan, the plan is not justified, effective or consistent with national policy, and is therefore not sound. Natural England is in ongoing discussions with the Environment Agency, Gloucestershire County Council and Breedon Aggregates regarding the current live planning application. If it would be of assistance then we would			

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						be pleased to discuss the Minerals Plan further, in advance of the plan proceeding to examination. **Annex – Detailed reasons against extending Stone Hill Quarry** **1. Inability of monitoring to protect Slade Brook SSSI** The proposals to extend Stowe Hill quarry rely on monitoring changes and stopping work before Slade Brook SSSI is impacted. Natural England does not agree that this will be possible. The Minerals Plan states that Slade Brook SSSI will be monitored to make sure there is 'no change in quality'. It is our view that monitoring changes would not provide adequate protection for Slade Brook SSSI. In the first instance, it is technically difficult to define a threshold beyond which there would be an impact on tufa formation. In addition, there may be a lag time before impacts on the tufa formation become apparent, so by the time an impact has been identified, it may be too late. The Minerals Plan is supported by a Hydrogeological Impact Assessment (HIA) dated 2016. As the planning application has been running in advance of the plan production process, the HIA referred to in the Plan does not reflect the most recent thinking. The HIA does not reflect the current conceptual understanding of the potential impacts of the quarry on Slade Brook, and it does not consider the impact of the removal of the			

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						epikarst on the hydrogeochemistry of Slade Brook. The most recent planning application (17/0122/FDMAJM) has been informed by thinking undertaken by Envireau and includes additional information regarding monitoring. Natural England is still concerned about the ability of the proposed monitoring to protect Slade Brook SSSI. Our concerns are described in detail in our most recent response to planning application 17/0122/FDMAJM, and are summarised here: □ the data loggers could have been located at better sites; □ the proposed monitoring of the quarry lagoons / ponds may not have been appropriate; □ the monitoring of Slade Brook to date has had issues which have reduced confidence in the data acquired, and therefore the conclusions reached, including whether or not the existing quarry has had an impact on the water chemistry of the brook. **2. Untested restoration scheme** The restoration of Stowe Hill Quarry is vital to preventing long term impacts on the hydrogeology of Slade Brook SSSI. However, we do not have confidence in the proposed restoration scheme as the methodology is currently untested. The existing quarry site has not yet been restored, and there is therefore no assurance that the restoration operation will return the area of land to an acceptable environmental			

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						condition once the mineral extraction has taken place. With the lack of proof of the effectiveness of the proposed methodology, we consider that the environmental risks are too great. Our concerns are described in detail in our most recent response to planning application 17/0122/FDMAJM, but are summarised as follows: □ The type of restoration proposed is currently untested; □ It is not clear whether there is sufficient material available on site to restore both the existing and the proposed quarry extension areas; □ There are uncertainties as to whether the correct hydrogeochemical conditions would be able to be created with the material available. The Government's *Guidance on the planning for mineral extraction in plan making and the application process* lists *"positive and negative environmental impacts (including the feasibility of a strategic approach to restoration)"* as considerations when assessing the suitability of a site, whether for extension or as a new allocation (Paragraph: 010 Reference ID: 27-010-20140306: https://www.gov.uk/guidance/minerals#planning-for-minerals-extraction)			
852145/11/MA01/USND	Mr Nigel Gibbons	Forest of Dean District Council	No	(2) Not justified (4) Not consistent with national policy		Reasons for unsoundness; The MLP does not provide a sufficient explanation of the reasons why the potential quantity of material within the preferred areas is so much higher than the identified	The above illustration shows that there is considerable flexibility in the MLP as published. It also suggests that the productive capacity of the three sites is more than	It is the view of the MPA that Publication MLP Policy MA01 should be revised in light of evidence received during the	**Possible Modification –** **Remove the reference to *"Allocation 01: Land east of***

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						need. While it is accepted that some additional provision is likely to be necessary and the reasons for this are as set out in the MLP, the difference between the two figures is very large and not sufficiently justified. The difference appears to be between a basic requirement of 10.4MT (App3) and 20 or even 28.4MT (the sum of the possible yields as in the site profiles). The three sites also appear to have a production capacity of about 1.6MT per year when current planning considerations are applied. This suggests that there is flexibility as the annual requirement is 1.01MT (app3). The potential life of Stowe Hill for example is given as 28 years beyond current reserves in the site profile.This assumes 17MT@ the current maximum of 600 000 tonnes pa. In order to meet the identified requirement however the three sites need only to average 61% of their production ceilings in each year, and that could produce a life of 45 years if this site's production was less on the same pro rata basis (ie 61% of its capacity or about 370 000tpa). The FoD crushed rock landbank at 2016 of 16 years (app3) shows considerable scope for existing reserves to meet the present demand. Allowances have been made for the use of secondary materials and for recycling but this may increase over time further adding to the "headroom" between provision and actual	sufficient to cope with considerable increases in requirements should they be necessary. While there is an accepted need for some flexibility, the published plan suggests a great deal of difference between the calculated need and the potential reserves which would be contained in the proposed preferred areas. The plan should closely review these calculations and assumptions and consider whether a reduction in the extent of the preferred areas is appropriate.This may also assist in addressing the specific issue raised in connection with Stowe Hill/ Clearwell below.	publication consultation stage relating to the deliverability of one of the plan's allocations. However, the revision being considered will not fundamentally alter the policy approach.	***Stowe Hill Quarry…"*** **and re-number the remaining allocations accordingly.**

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MA01 | Aggregate working within allocations is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MA01 | Aggregate working within allocations is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						need.			
1164737/32/MA01/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
794755/16/MA01/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound' is noted.	No modifications are considered necessary in response to the representation.
793547/5/MA01/USND	Respondent	Elliott and Sons Ltd	No			This is unsound for the following reasons Qualification I. is inappropriate as applications in preferred areas should not have to address matters of need. The identification of only two areas of sand and gravel reserves is contrary to NPPF paragraph 145. This in effect creates a future monopoly situation and will effectively prevent smaller existing sand and gravel operators continuing and discourage new operators.		It is the view of the MPA that the assemblage of allocations within the Publication MLP represents the most appropriate and reasonable approach having considered all reasonable alternatives available during the plan's preparation. The assemblage has been subject to numerous 'Call for sites', public scrutiny through consultation and technical assessment to determine potential deliverability. The concern about the plan's potential risk of facilitating a local monopoly over sand & gravel	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MA01 | Aggregate working within allocations is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MA01 | Aggregate working within allocations is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								is noted. However, the MPA considers that provision within the wider policy framework – as exemplified in policy MA02, is sufficient to avoid this from occurring.	
1169920/1/MA01/USND	Mark Davies	Environment Agency	No	(2) Not justified (3) Not effective (4) Not consistent with national policy		Policy MA01 We have raised some concerns on the inclusion of Stowe Quarry as detailed in our representation to Appendix 4 Detailed development requirements for plan allocations. Policy MA01 - Aggregate working within allocations states that "the principle of mineral working for aggregates has been accepted within the following allocations: - · Allocation 01: Land east of Stowe Hill Quarry; We would question whether this is the best site on the basis of information submitted as part of the planning application / EIA to date. We note that "Mineral development proposals for the working of aggregates within allocations will be permitted, subject to satisfying the detailed development requirements set out in the plan for each allocation (see appendix 4)…"	Please refer to our comments on Stowe Quarry allocation 01.	It is the view of the MPA that Publication MLP Policy MA01 should be revised in light of evidence received during the publication consultation stage relating to the deliverability of one of the plan's allocations.	**Possible Modification –** **Remove the reference to *"Allocation 01: Land east of Stowe Hill Quarry…"* and re-number the remaining allocations accordingly.**

Matters related to the supporting text to Policy MA01 | Aggregate working within allocations

Publication MLP Consultation Questionnaire Reference | Questions 34.1, 34.2, 34.3, 34.4, 34.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MA01 (paragraphs 219-231 and 241 - 246) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MA01 (paragraphs 219-231 and 241 - 246) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1028219/14/MA01/USND	Ms Nicola Packer		No	(2) Not justified		If the allocations were 'founded upon a rigorous review of evidence' then Stowe Hill would not be included.		It is the view of the MPA that the supporting text to Publication MLP Policy MA01 should be revised in light of evidence received during the publication consultation stage relating to the deliverability of one of the plan's allocations.	**Possible Modification –** **Under Publication MLP paragraph 221 replace *"7"* with *"6"* and *"five"* with *"four"*.**
794029/1/MA01/USND	Respondent	Tarmac Trading Ltd	No	(2) Not justified (3) Not effective (4) Not consistent with national policy	Yes	By way of introduction, Tarmac supports the approach of the plan in terms of the aggregate resource requirements, the sub division between the two defined resource areas, and the allocations set out in Policy MA01 designed to meet the resource requirements. However, Policy A01 and the supporting paragraph 225 require that proposals for the working of aggregates within the allocations will	"The second paragraph of Policy MA01 should be amended to read: Mineral development proposals for the working of aggregates within allocations will be permitted, subject to satisfying the detailed development requirements set out in the plan for each allocation (see appendix4). The level of detail required to address"	It is the view of the MPA that the policy requirements are reasonable and proportionate. Health Impact Assessments (HIAs) are not mandatory and no specific request is made for them within the Detailed Development Requirements set out in Appendix 4. For Economic Impact Assessment (EcIA) the detail required will very much need to established on a case-by-case basis, albeit that the Detailed Development	No modifications are considered necessary in response to the representation.

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						be permitted "subject to satisfying the detailed development requirements set out in the plan for each allocation (see Appendix 4)". Appendix 4 duly sets out the development requirements which include, for each of the allocations, the need to undertake a Health Impact Assessment Screening exercise, and that an economic impact assessment will be required to identify potential economic impacts and their significance. It is recognised that these requirements have been applied to the 'development requirements' for each of the allocations, as a common approach. Nevertheless, it is not the case that these requirements will be relevant, or applicable to the same degree at all sites. It should also be noted that Health Impact Assessments are not mandatory		Requirements set out in Appendix 4 offer guidance on the parameters of what should be considered.	

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						as a matter of national planning policy, or as a requirement of the EIA Regulations 2017: the issue is one of the circumstances of each case and the need to take a proportional approach in considering the need for such an assessment, and if required, the level of detail which would be appropriate, founded upon related studies undertaken as part of the from which objective conclusions can be drawn (noise, blast vibration, air quality and traffic). It will not be necessary to review 'health profiles' in all cases (ref footnote 283 on Stowfield, and a similar footnote for the other allocations). Similar issues arise in relation to an 'Economic Impact Assessment', which may be relevant to certain allocations, but which will be less relevant to			

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						others, notably Stowfield. The allocation at Stowfield, involving deepening within the existing quarry footprint, would simply provide additional reserves to allow the quarry to continue in operation for a further time period. The economic benefits of this in terms of continuity of supply and maintenance of employment of the existing workforce would be highlighted as part of a planning application submission, and whilst these socio economic issues are important, it is disproportionate to make it mandatory to submit an Economic Impact Assessment to address the issue. Planning Practice Guidance accompanying the NPPF confirms, inter alia, that an ES "should be proportionate and not be any longer than is necessary to assess properly (the			

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MA01 (paragraphs 219-231 and 241 - 246) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MA01 (paragraphs 219-231 and 241 - 246) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						significant) effects…. Impacts which have little or no significance for the particular development in question will need only very brief treatment to indicate that their possible relevance has been considered" (ref Planning Practice Guidance ID4-033).			
1038720/33/MA01/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
852145/12/MA01/USND	Mr Nigel Gibbons	Forest of Dean District Council	No			May require amendment as a consequence of representations made		It is the view of the MPA that the supporting text to Publication MLP Policy MA01 should be revised in light of evidence received during the publication consultation stage relating to the deliverability of one of the plan's allocations.	**Possible Modification –** **Under Publication MLP paragraph 221 replace *"7"* with *"6"* and *"five"* with *"four"*.**
1164737/33/MA01/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
802358/5/MA01/USND	Respondent	Smiths (Gloucester) Ltd	No			Policy MA01 | Aggregate working		It is the view of the MPA that the	No modifications are considered

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MA01 (paragraphs 219-231 and 241 - 246) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MA01 (paragraphs 219-231 and 241 - 246) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						within allocations This is unsound for the following reasons Qualification I. is inappropriate as applications in preferred areas should not have to address maters of need and so should be deleted. The identification of only two areas of sand and gravel reserves is contrary to NPPF paragraph 145. This in effect creates a future monopoly situation and will effectively prevent smaller sand and gravel operators continuing and discourage new operators.		assemblage of allocations within the Publication MLP represents the most appropriate and reasonable approach having considered all reasonable alternatives available during the plan's preparation. The assemblage has been subject to numerous 'Call for sites', public scrutiny through consultation and technical assessment to determine potential deliverability. The concern about the plan's potential risk of facilitating a local monopoly over sand & gravel is noted. However, the MPA considers that provision within the wider policy framework – as exemplified in policy MA02, is sufficient to avoid this from occurring.	necessary in response to the representation.

Matters related to Policy MA02 | Aggregate working outside of allocations

Publication MLP Consultation Questionnaire Reference | Questions 35.1, 35.2, 35.3, 35.4, 35.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MA02 | Aggregate working outside of allocations is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MA02 | Aggregate working outside of allocations is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/34/MA02/USND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	No	(3) Not effective	No	It is suggested that further clarification on the meaning of 'residual working of an area of aggregate mineral resource' (Point III) is provided. Does this infer small scale extensions contiguous to existing sites would not be deemed excessively extended?	Providing definitions to the above mentioned statement.	It is the view of the MPA that further clarification is not necessary. The supporting text under Publication MLP paragraph 239 is sufficiently detailed to assist applicants and decision makers. Whether a proposal for aggregate working can be considered as 'residual' is a matter to be dealt with on a case-by-case basis within the parameters provided in the supporting text.	No modifications are considered necessary in response to the representation.
794755/17/MA02/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
793547/6/MA02/USND	Respondent	Elliott and Sons Ltd	No			Given that MA01 is so restrictive (and inappropriate, see above comments) there should be a more positive policy to the working of outside of allocations not just in relation to sterilisation or small	MA02 IV should have the words 'enhancements to previously approved plans for' should be deleted as this automatically only prohibits limits multi development at new sites irrespective of	It is the view of the MPA that Publication MLP Policy MA02 represents an appropriate and proportionate response to the management of mineral working outside of plan	**Possible Modifications –** **Under Publication policy MA02: - add after*"…where"* in the opening sentence *"…one or more of the following…."* and**

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MA02 | Aggregate working outside of allocations is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MA02 | Aggregate working outside of allocations is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						scale extensions. Notwithstanding there only two allocated sites for sand and gravel the allocated reserves are is also located in the eastern side of the county and historically there have been minerals operations in the centre and north of the county, smaller in scale and with a slightly different mineralogical reserves but equally valuable to the overall supply of minerals. The Policy does not acknowledge this. Working of these areas should be provided for.	merits.	allocations. However, it is acknowledged that the circumstances under which certain policy clauses should be applied and the treatment of restoration would benefit from a revision to improve clarity	**delete *"it".* Also, delete *"and / or..."* after each policy clause. In addition, for the 4th clause after *"they will…"* add *"…not prejudice the delivery of previously approved restoration plans and facilitate materially significant enhancements to site restoration that will support the achievement of beneficial after-uses and will have satisfactorily met the requirements of policy MR01 (Restoration, aftercare and facilitating beneficial after-uses)" Delete all remaining parts of the 4th clause.**
802358/6/MA02/USND	Respondent	Smiths (Gloucester) Ltd	No			Policy MA02 | Aggregate working outside of allocations Given that MA01 is so restrictive (and inappropriate, see previous comments) there should be a more positive policy to the working of outside of allocations	MA02 IV should have the words 'enhancements to previously approved plans for' should be deleted as this automatically only prohibits limits multi development at new sites irrespective of merits.	It is the view of the MPA that Publication MLP Policy MA02 represents an appropriate and proportionate response to the management of mineral working outside of plan allocations.	**Possible Modifications –** **Under Publication policy MA02: - add after*"…where"* in the opening sentence *"…one or more of the following…."* and delete *"it".* Also,**

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MA02 | Aggregate working outside of allocations is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MA02 | Aggregate working outside of allocations is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						not just in relation to sterilisation or small scale extensions. Not only are there only two allocated sites for sand and gravel but they are both located in the eastern side of the county. Historically there have been minerals operations in the centre of the county working smaller scale and different reserves but equally valuable to the overall supply of minerals. The Policy does not acknowledge this. The policy should provide support where this can be done in an acceptable manner, without significant adverse impact to general constraints.		However, it is acknowledged that the circumstances under which certain policy clauses should be applied and the treatment of restoration would benefit from a revision to improve clarity	**delete *"and / or..."* after each policy clause. In addition, for the 4th clause after *"they will…"* add *"…not prejudice the delivery of previously approved restoration plans and facilitate materially significant enhancements to site restoration that will support the achievement of beneficial after-uses and will have satisfactorily met the requirements of policy MR01 (Restoration, aftercare and facilitating beneficial after-uses)" Delete all remaining parts of the 4th clause.**
1028219/15/MA02/USND	Ms Nicola Packer		No	(1) Not positively prepared		The plan should be based on supply not demand. It is constantly saying that any amount of social and/or environmental damage is justified to satisfy demand. This approach is not sustainable.		It is the view of the MPA that Publication MLP Policy MA02 represents an appropriate and proportionate response to the management of mineral working outside of plan allocations.	No modifications are considered necessary in response to the representation.
808023/11/MA02/COM	Mr	Group Director -				Policy MA02 – as		It is the view of the	**Possible**

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MA02 | Aggregate working outside of allocations is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MA02 | Aggregate working outside of allocations is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
	Peter Andrew	Quarry Products HIlls Quarry Products Ltd				above – not clear what it means – as if it is at a planned or permitted site, there wouldn't be an application to consider. This list could also include circumstances such as a borrow pit		MPA that Publication MLP Policy MA02 represents an appropriate and proportionate response to the management of mineral working outside of plan allocations. However, it is acknowledged that the policy would benefit from an additional clause to cover the specific circumstance of potential aggregate borrow pits.	**Modification –** **Under Publication policy MA02 add a new clause that reads as follows;** ***"they represent a borrow bit that is justifiably required to facilitate the delivery of a specified development project and will be fully reclaimed as part of that project."*** **Also add the following additional supporting text as a new paragraph;** ***"A borrow pit cannot be precisely defined in terms of quantity of mineral worked or duration. However, in order for mineral working to be classified as such, a direct functional link between the exploitable mineral and the delivery of a named, permitted development must be shown. The consequences of the relationship must also meaningfully contribute towards the achievement of***

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MA02 | Aggregate working outside of allocations is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MA02 | Aggregate working outside of allocations is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
									sustainable development. To demonstrate this evidence of environmental or other planning benefits compared to obtaining minerals from alternative sources will be necessary. In addition, all mineral operations must be tied to the development and the timeframe associated with site restoration and aftercare will need to be aligned with the completion of the development. A borrow pit is typically located next to, or nearby to the development it is supporting. It is also usually the case that any restoration materials that may be required will arise, at least in part, from the construction of the supported development. However, under all circumstances site restoration of a borrow pit must be acceptable in planning terms

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MA02 | Aggregate working outside of allocations is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MA02 | Aggregate working outside of allocations is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
									having been appropriately assessed against the relevant development management plan policies from DM01 to DM11 and policy MR01."
1038720/34/MA02/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
807759/2/MA02/SND	Mr Ben Horovitz	Strategic Planning Team Worcestershire County Council	Yes			Policy MA02 Aggregate working outside of allocations This policy seeks to enable flexibility in the plan for mineral working beyond the allocated sites in a limited number of circumstances. We fully support the inclusion of such a policy. However, during the development of the plan, a cross-boundary site has been put forward for consideration at Redpools Farm (Gloucestershire) and Bow Farm (Worcestershire), whereby the Redpools Farm area is likely to be required to facilitate access to the Bow	We would suggest that this could be addressed by a simple change to point III as follows: "they represent or would enable the working of an area of aggregate mineral resource that is permitted or planned to be worked and would otherwise be impractical to exploit in any other way"	It is acknowledged by the MPA that Publication MLP Policy MA02 would benefit from a revision. A Statement of Common Ground (SoCG) has been prepared involving the MPA and the Worcestershire County Council to set out in detail a change that could form part of a request for formal modifications for consideration at examination.	**Possible Modification –** **Under Publication policy MA02, clause III after *"…permitted"* delete"*…planned to be worked and…"* and replace with *"or would function as enabling development for planned future working, which…"***

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MA02 | Aggregate working outside of allocations is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MA02 | Aggregate working outside of allocations is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Farm area. This has been subject to extensive and ongoing consideration by both authorities through the Duty to Cooperate. In the Third Stage Consultation on the Worcestershire Minerals Local Plan, the Bow Farm site did not meet the proposed criteria for allocation, and we understand that this is one of a number of reasons that the Redpools Farm site has not been proposed for allocation as a Preferred Area in the Gloucestershire Minerals Local Plan publication version. However, the approach to site screening and selection in Worcestershire is being revised and further information on the Bow Farm site has been submitted, and (without prejudice) it is therefore possible that, when the site is reconsidered, it may meet the criteria for allocation. We do not			

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MA02 | Aggregate working outside of allocations is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MA02 | Aggregate working outside of allocations is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						suggest that the Redpools Farm site should be allocated, and our comments here should not be considered to question the soundness of the proposed site selection or allocation process, but we understood from Duty to Cooperate discussions that sufficient flexibility would be built in to Policy MA02 to enable the site to come forward should it be required to enable working of the Bow Farm site in Worcestershire. We consider that, as currently drafted, it does not include provision for such circumstances.			

Matters related to the supporting text to Policy MA02 | Aggregate working outside of allocations

Publication MLP Consultation Questionnaire Reference | Questions 36.1, 36.2, 36.3, 36.4, 36.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MA02 (paragraphs 232-240) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Objectives is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
808023/12/MA02/COM	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd				Para 234 – does "small scale residual working at an existing permitted site" mean an extension ? (in relation to unallocated sites)		In response to the question, it is the view of the MPA that. "residual working" in relation to Publication MLP policy MA02 could involve an extension to an existing aggregate mineral working.	No modifications are considered necessary in response to the representation.
1038720/35/MA02/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
807759/3/MA02/SND	Mr Ben Horovitz	Strategic Planning Team Worcestershire County Council					Paragraph 239 would need to be amended accordingly. We suggest the following: "Aggregate working outside of allocations, which represents or would enable working of an area of aggregate mineral resource that is permitted or planned to be worked, will need careful consideration. Proposals will be assessed with	It is acknowledged by the MPA that the supporting text to Publication MLP Policy MA02 would also benefit from a revision to reflect the considered changes to the policy. A Statement of Common Ground (SoCG) has been prepared involving the MPA and the Worcestershire County Council to set out in detail changes that could form part of a request for formal	**Possible Modification –** **For Publication MLP paragraph 239, after *"residual working" and before "…, will need careful consideration."* add the following text *"…or enabling development"*. Also after "…characteristics of existing…" add *"…or planned"*.**

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MA02 (paragraphs 232-240) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Objectives is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
							regards to their size, scale and timeframe compared to the characteristics of any existing aggregate working site it relates to, or the practicability of resources being exploited in other ways. Ensuring that an existing mineral working will not be excessively extended will be a critical factor. Furthermore, previously approved mineral site restoration must not be unduly inhibited. Although, where revised mineral restoration is submitted, this must be acceptable in principle and offer demonstrable benefits with regard to future land use opportunities".	modifications for consideration at examination.	
1164737/35/MA02/USND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	No	(3) Not effective	No	Clarification on the definition of 'excessively' (Paragraph 239) in terms of extending is sought.	Providing definitions to the above mentioned term.	It is acknowledged that the 3rd sentence of Publication MLP paragraph 239 is unnecessary and that sufficient and proportionate control of future aggregate working outside of allocations is already	**Possible Modification -** **Remove the 3rd sentence from Publication MLP paragraph 239.**

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MA02 (paragraphs 232-240) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Objectives is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								provided for elsewhere within the policy.	
793547/7/MA02/USND	Respondent	Elliott and Sons Ltd	No			Whilst policy MW02 allows residual areas to be worked, the interpretation of paragraph 239 is highly restrictive, what would be considered a residual area, if it is not continuous to the works would it be ruled out even if using all the same infrastructure. It appears to rule out anything other than the smallest of working and this would restrict sustainability benefits.		It is acknowledged by the MPA that the supporting text to Publication MLP Policy MA02 would benefit from a number of revisions to aid with clarity for both applicants and decision makers.	**Possible Modifications -** **Remove the 3rd sentence from Publication MLP paragraph 239 and revise the 4th sentence so that it reads; *"The deliverability of previously approved mineral site restoration and aftercare schemes must not be unduly affected. Although, where it is necessary to make any amendments to existing restoration proposals such as for operational reasons, this must result in materially significant restoration enhancements (e.g. an increase in public access, facilitating greater biodiversity, or the creation of more sympathetic landforms etc.)."***
802358/7/MA02/USND	Respondent	Smiths (Gloucester) Ltd	No			Whilst policy MW02 allows residual areas		It is acknowledged by the MPA that the	**Possible Modifications -**

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MA02 (paragraphs 232-240) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Objectives is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						to be worked, the interpretation of paragraph 239 is highly restrictive, what would be considered a residual area, if it is not continuous to the existing works would it be ruled out even if using all the same infrastructure. It appears to rule out anything other than the smallest of working and this would restrict sustainability benefits.		supporting text to Publication MLP Policy MA02 would benefit from a number of revisions to aid with clarity for both applicants and decision makers.	**Remove the 3rd sentence from Publication MLP paragraph 239 and revise the 4th sentence so that it reads; *"The deliverability of previously approved mineral site restoration and aftercare schemes must not be unduly affected. Although, where it is necessary to make any amendments to existing restoration proposals such as for operational reasons, this must result in materially significant restoration enhancements (e.g. an increase in public access, facilitating greater biodiversity, or the creation of more sympathetic landforms etc.)."***

Matters related to introductory text to Section 10 (paragraphs 247-265)

Publication MLP Consultation Questionnaire Reference | Questions 37.1, 37.2, 37.3, 37.4, 37.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Introductory text to Section 10 (paragraphs 247-265) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Introductory text to Section 10 (paragraphs 247-265) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
808023/13/DMT/COM	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd				Para 257 – Community engagement - inappropriate wording - There can't be significant effects, or the development would not be permitted		It is the view of the MPA that wording set out in Publication MLP paragraph 257 is appropriate. The use of the term 'significant' is to acknowledge that the degree of influence of a proposal should be a key determining factor for engagement with local communities. Significance is not the same and severity. It is a neutral term in that effects could be positive or negative. Community engagement should not just be restricted to the resolution of problems and participation should also be encouraged with potential betterments. This approach fully accords with national policy on this matter.	No modifications are considered necessary in response to the representation.
1038720/36/DMT/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Introductory text to Section 10 (paragraphs 247-265) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Introductory text to Section 10 (paragraphs 247-265) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/36/DMT/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be ‘sound’ and ‘legally compliant’, is noted.	No modifications are considered necessary in response to the representation.

Matters related to Policy DM01 | Amenity

Publication MLP Consultation Questionnaire Reference | Questions 38.1, 38.2, 38.3, 38.4, 38.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM01 | Amenity is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM01 | Amenity is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
924705/6/DM01/USND	Respondent	Head of Estates & Planning Breedon Aggregates	No			Policy DM01 Amenity does not recognise that mitigation may not always be achievable. As a result mineral development that is in the wider public interest would be in conflict with this Policy if amenity impacts to the local community cannot be wholly mitigated. This in effect removes the ability to weigh, in the planning balance, negative micro impacts against the positive macro impacts a development might provide to the wider community.		It is the view of the MPA that the policy provides a reasonable and proportionate approach to responding to the issue of amenity protection. The policy acknowledges that adverse impacts could arise with minerals development and that on balance these may be justified when considered in the round with all other relevant planning matters. The policy threshold is the potential for unacceptable amenity impacts to occur.	No modifications are considered necessary in response to the representation.
1038720/37/DM01/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be ‘sound’, is noted.	No modifications are considered necessary in response to the representation.
802366/1/DM01/USND	Mr Dave Kent	West Dean Parish Council	No	(2) Not justified (4) Not consistent with national policy	No	Policy DM01 (“Amenity”) is UNSOUND in respect of Allocation	Additional wording “Positive regard will be made to the levels of Nitrogen	It is the view of the MPA that the policy provides a reasonable and	No modifications are considered necessary in response to the

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM01 | Amenity is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM01 | Amenity is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						01 (Land east of Stowe Hill quarry). No account has been taken of Air Quality Measurement in Lydney, and the current level of Nitrogen Dioxide emissions NO2 pollution in Chepstow and Coleford, on routes used by HGVs to and from the Allocation site. The omission of this aspect conflicts with NPPF 124 Policy DM01 (“Amenity”) is UNSOUND in respect of Allocation 01 (Land east of Stowe Hill quarry). It is essential that a minimum 250m buffer zone be imposed between the curtilage boundary of any residential property and any quarry working, to ensure adequate protection of the local community. These buffer zones were included in the 2014 version of the plan but have been excluded in this	Dioxide the Lydney AQMA, in Chepstow and in Coleford and where these levels are close to or exceed the nationally approved limit, the Allocation Area 01 will be removed from the plan”. The inclusion of a clause to the effect that a 250m buffer zone will apply, to comply with NPPF 143 & 144 as identified above	proportionate approach to responding to the issue of amenity protection. In respect of air quality matters, the supporting text to the policy specifically refers to the existence of AQMAs and advises that affects upon on them should be a factor when assessing amenity. Specific concern raised regarding the plan’s allocations has been considered elsewhere under the response to Publication MLP policy MA01 and Appendix 4.	representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM01 | Amenity is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM01 | Amenity is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						version. The exclusion of such buffer zones conflicts with NPPF 143 (bullet point 6). NPPF 144 (bullet point 3).			
794030/6/DM01/USND	Respondent	Syreford Quarries & Masonry Ltd	No					The representation, which considers this matter to be 'unsound', is noted.	No modifications are considered necessary in response to the representation.
820738/6/DM01/USND	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd	No					The representation, which considers this matter to be 'unsound', is noted.	No modifications are considered necessary in response to the representation.
1042027/1/DM01/USND	Mr Christopher Wilderspin		No	(2) Not justified (4) Not consistent with national policy	No	Policy DM01 ("Amenity") is UNSOUND in respect of Allocation 01 (Land east of Stowe Hill quarry). No account has been taken of the AQMA in Lydney, current level of NO2 pollution in Chepstow and Coleford, all of which are on routes used by HGVs to/from the Allocation site. The omission of this aspect conflicts with NPPF 124 It is essential that a minimum 250m	Additional wording "Positive regard will be had to the levels of NO2 at the Lydney AQMA, in Chepstow and in Coleford and where these levels are close to or exceed the nationally approved limit, the Allocation Area 01 will be removed from the plan. The inclusion of a clause to the effect that a 250m buffer zone will apply, to comply with NPPF 143 & 144	It is the view of the MPA that the policy provides a reasonable and proportionate approach to responding to the issue of amenity protection. In respect of air quality matters, the supporting text to the policy specifically refers to the existence of AQMAs and advises that affects upon on them should be a factor when assessing amenity. Specific concern raised regarding the plan's	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM01 | Amenity is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM01 | Amenity is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						buffer zone be imposed between the curtilage boundary of any residential property and any quarry working, to ensure adequate protection of the local community. Such buffer zones were included in the 2014 version of the plan but have been excluded in this version. The exclusion of such buffer zones conflicts with NPPF 143 (bullet point 6). NPPF 144 (bullet point 3).		allocations has been considered elsewhere under the response to Publication MLP policy MA01 and Appendix 4.	
1164737/37/DM01/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1169771/9/DM01/USND	Mr Michael Krier	Chairman Temple Guiting Parish Council	No				All sense of scale of impact is lost by including statements on which parts of the house are included and this should be deleted from the plan.	It is the view of the MPA that the policy provides a reasonable and proportionate approach to responding to the issue of amenity protection. In respect of any specific matters concerning privacy, the supporting text seeks	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM01 | Amenity is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM01 | Amenity is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								to advise upon an achievable, proportionate and consistent way of assessment for all parties concerned..	
794755/18/DM01/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be ‘sound’, is noted.	No modifications are considered necessary in response to the representation.
793504/6/DM01/USND		Stanway Stone Company	No					The representation, which considers this matter to be ‘unsound’, is noted.	No modifications are considered necessary in response to the representation.
793895/6/DM01/USND	Respondent	Cotswold Stone Quarries	No					The representation, which considers this matter to be ‘unsound’, is noted.	No modifications are considered necessary in response to the representation.
802358/8/DM01/USND	Respondent	Smiths (Gloucester) Ltd	No					The representation, which considers this matter to be ‘unsound’, is noted.	No modifications are considered necessary in response to the representation.

Matters related to the supporting text to Policy DM01 | Amenity

Publication MLP Consultation Questionnaire Reference | Questions 39.1, 39.2, 39.3, 39.4, 39.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
924705/7/DM01/USND	Respondent	Head of Estates & Planning Breedon Aggregates	No			Paragraph 272 –Why are Health Impact Assessments required where impacts such as noise and dust are mitigated to the point that is deemed acceptable for planning to be granted? It is highly questionable what benefit a Health Risk Assessment would provide. Furthermore the inclusion of Health Impact Assessments implies that mineral extraction is somehow hazardous to health. Without clear evidence that this is the case the need for Health Impact Assessment should be deleted. Paragraph 281 – Establishing existing air quality is not required for all mineral developments, only those which have a significant potential to create dust. The wording needs to be changed to reflect this or there is a risk		The supporting text to Publication MLP policy DM01 does not mandate the carrying out of a Health Impact Assessment (HIA). It advises on their potential use as part of an application's evidence base. However, it is acknowledged by the MPA that a number of minor revisions to the supporting text would assist with clarity. Furthermore, it is also noted that the supporting text concerning air pollution matters would also benefit from a revision. In respect of the text provided on privacy, this is deemed by the MPA to be wholly reasonable as it provides a workable approach to assisting this issue for both decision makers and applicants.	**Possible Modifications –** **Under Publication MLP paragraph 281, 4th sentence after *"…planning practice guidance…"* replace *"…should be provided alongside…"* with *"may be necessary to support…"*** **Under Publication MLP paragraph 272, 2nd sentence replace the word *"…critical"* with *"important".* Also, add *"…referred to in national policy"* after "…matters" and delete *"…as required by national policy"*.** **Under Publication MLP paragraph 273, 1st sentence replace *"…should be carried out"* with *"…is recommended"*. Also, in the 2nd sentence replace *"…must"* with *"…should"*.**

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						that a Dust Risk Assessment will be required for all mineral developments which would be an unreasonable burden on some mineral operators. The need for such an assessment should be screened out the Pre-Application or Scoping Opinion advice stages and not included as a blanket requirement in this Plan. Paragraph 291 concerns privacy. The requirements of assessing privacy are subjective and not supported by recognised assessment methods. The impact of overlooking is already assessed as part of a Visual Impact Assessment. As a result, this paragraph should be deleted.			

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
808023/14/DM01/USND	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd	No			Para 272 – If emissions such as noise and dust are mitigated to the point that is deemed acceptable and for planning to be granted, why would an Health Risk Assessment be of any benefit? Inclusion of this implies that mineral extraction is somehow hazardous to health. Where is the justification for yet another assessment in relation to mineral planning? Furthermore, the guidance that the Plan links to is in relation to the development of Policy, not the determination of applications. No justification for inclusion of this section Para 281 – Establishing existing air quality would not be relevant to all assessments, nor is it appropriate to link air quality along established freight routes relating to the proposal. How far away from site would		The supporting text to Publication MLP policy DM01 does not mandate the carrying out of a Health Impact Assessment (HIA). It advises on their potential use as part of an application's evidence base. However, it is acknowledged by the MPA that a number of minor revisions to the supporting text would assist with clarity. Furthermore, it is also noted that the supporting text concerning air pollution matters would also benefit from a revision.	**Possible Modifications –** **Under Publication MLP paragraph 281, 4th sentence after *"…planning practice guidance…"* replace *"…should be provided alongside…"* with *"may be necessary to support…"*** **Under Publication MLP paragraph 272, 2nd sentence replace the word *"…critical"* with *"important".* Also, add *"…referred to in national policy"* after "…matters" and delete *"…as required by national policy"*.** **Under Publication MLP paragraph 273, 1st sentence replace *"…should be carried out"* with *"…is recommended"*. Also, in the 2nd sentence replace *"…must"* with *"…should"*.**

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						be appropriate ?			
1038720/38/DM01/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be ‘sound’, is noted.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1033898/1/DM01/USND	Mrs Mary Condrad		No	(2) Not justified (4) Not consistent with national policy	No	Policy DM01 ("Amenity") is unsound in respect of allocation 01 (land east of Stowe Hill quarry) No account has been taken of AQMA in Lydney, current level of NO2 pollution in Chepstow and Coleford, all of which are on routes used by HGVs to/from the allocation site. The omission of this aspect conflicts with NPPF 124 Policy DM01 ("Amenity") is unsound in respect of allocation 01 (land east of Stowe Hill quarry). A minimum buffer zone of 250m between the boundary of residential properties and the quarry is essential to protect those properties. The 2014 version of the plan included these buffer zones but they have been excluded in this version. This exclusion conflicts with NPPF 143 (bullet point 6), NPPF 144 (bullet point 3)	Additional wording: "Positive regard will be had to the levels of NO2 at the Lydney AQMA , in Chepstow and in Coleford, and where these levels are close to or exceed the nationally approved limit, the allocation area 01 will be removed from the plan" A clause should be included to the effect that a 250m buffer zone will apply. This will comply with NPPF 143 and 144	It is the view of the MPA that the policy provides a reasonable and proportionate approach to responding to the issue of amenity protection. In respect of air quality matters, the supporting text to the policy specifically refers to the existence of AQMAs and advises that affects upon on them should be a factor when assessing amenity. Specific concern raised regarding the plan's allocations has been considered elsewhere under the response to Publication MLP policy MA01 and Appendix 4.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
794030/7/DM01/USND	Respondent	Syreford Quarries & Masonry Ltd	No			Policy DM01 | Amenity The policy which 'applies a broad understanding of 'amenity'' is essentially as generalisation of NPPF policy and is of questionable assistance to operators. The text refers to applications being accompanied by thorough investigations with no meaningful guidance providing a local interpretation of national policy. The presentation of policy and text will allow the council to request any assessment without a meaningful justification. For example Health Impact Assessments (para 272) are given prominence, there is a link to generic guidance which does not even mention minerals. Odour is referred to, this is not acknowledged problem with minerals sites, if it a problem in Gloucestershire what is the context? Establishing a Community liaison		It is the view of the MPA that the supporting text to Publication MLP policy DM01 provides a reasonable steer for both applicants and decision makers in respect of the amenity matters likely to be of significance with minerals development. It also presents the various approaches that should be taken in responding to any potential risks of adverse impacts occurring. It is however, acknowledged that a number of minor revisions to the supporting text would assist with clarity.	**Possible Modifications –** **Under Publication MLP paragraph 281, 4th sentence after *"…planning practice guidance…"* replace *"…should be provided alongside…"* with *"may be necessary to support…"*** **Under Publication MLP paragraph 272, 2nd sentence replace the word *"…critical"* with *"important".* Also, add *"…referred to in national policy"* after "…matters" and delete *"…as required by national policy"*.** **Under Publication MLP paragraph 273, 1st sentence replace *"…should be carried out"* with *"…is recommended"*. Also, in the 2nd sentence replace *"…must"* with *"…should"*.**

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						group is something that would be unlikely to meet the tests of planning conditions. Noise – if high levels of noise are generated but no receptors are nearby why does an activity need to be restricted? Lighting – 'not to breach acceptable levels', what does this mean? Extraction operations don't have lighting and associated mineral development, processing plant, have limited hours of operation in poor lighting conditions. Privacy – what is meant by 'overlooking' as if a mineral site is in extreme close proximity to a property then surely there would be other greater amenity impacts. The above comments may seem flippant but they are to illustrate the point that the policy and text are not 'positive'. It is accepted that assessments may be justified in some instances but only when necessary and			

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						then proportionate to the nature and scale of development proposed and its location and receptors. But such qualification is not given nor any guidance in respect particular local circumstances.			
820738/7/DM01/USND	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd	No			Policy DM01 | Amenity The policy which 'applies a broad understanding of 'amenity'' is essentially as generalisation of NPPF policy and is of questionable assistance to operators. The text refers to applications being accompanied by thorough investigations with no meaningful guidance providing a local interpretation of national policy. The presentation of policy and text will allow the council to request any assessment without a meaningful justification. For example Health Impact Assessments (para 272) are given prominence, there is a link to generic		It is the view of the MPA that the supporting text to Publication MLP policy DM01 provides a reasonable steer for both applicants and decision makers in respect of the amenity matters likely to be of significance with minerals development. It also presents the various approaches that should be taken in responding to any potential risks of adverse impacts occurring. It is however, acknowledged that a number of minor revisions to the supporting text would assist with clarity.	**Possible Modifications –** **Under Publication MLP paragraph 281, 4th sentence after *"…planning practice guidance…"* replace *"…should be provided alongside…"* with *"may be necessary to support…"*** **Under Publication MLP paragraph 272, 2nd sentence replace the word *"…critical"* with *"important".* Also, add *"…referred to in national policy"* after "…matters" and delete *"…as required by national policy"*.** **Under Publication MLP paragraph 273, 1st sentence**

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						guidance which does not even mention minerals. Odour is referred to, this is not acknowledged problem with minerals sites, if it a problem in Gloucestershire what is the context? Establishing a Community liaison group is something that would be unlikely to meet the tests of planning conditions. Noise – if high levels of noise are generated but no receptors are nearby why does an activity need to be restricted? Lighting – 'not to breach acceptable levels', what does this mean? Extraction operations don't have lighting and associated mineral development, processing plant, have limited hours of operation in poor lighting conditions. Privacy – what is meant by 'overlooking' as if a mineral site is in extreme close proximity to a property then surely there would be other			**replace *"…should be carried out"* with *"…is recommended"*. Also, in the 2nd sentence replace *"…must"* with *"…should"*.**

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						greater amenity impacts. The above comments may seem flippant but they are to illustrate the point that the policy and text are not 'positive'. It is accepted that assessments may be justified in some instances but only when necessary and then proportionate to the nature and scale of development proposed and its location and receptors. But such qualification is not given nor any guidance in respect particular local circumstances.			
1164737/38/DM01/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
802393/1/DM01/USND	Ms A Lapington	Coleford Town Council	No	(2) Not justified (4) Not consistent with national policy	No	Policy DM01 ("Amenity") is UNSOUND in respect of Allocation 01 (Land east of Stowe Hill quarry). It is essential that a minimum 250m buffer zone be imposed between the curtilage boundary of any residential property and any	The inclusion of a clause to the effect that a 250m buffer zone will apply, to comply with NPPF 143 & 144 Additional wording "Positive regard will be had to the levels of NO2 at the Lydney AQMA, in Chepstow and in Coleford and where	It is the view of the MPA that the policy provides a reasonable and proportionate approach to responding to the issue of amenity protection. In respect of air quality matters, the supporting text to the policy specifically refers to the	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						quarry working, to ensure adequate protection of the local community. Such buffer zones were included in the 2014 version of the plan but have been excluded in this version. The exclusion of such buffer zones conflicts with NPPF 143 (bullet point 6). NPPF 144 (bullet point 3). Policy DM01 (“Amenity”) is UNSOUND in respect of Allocation 01 (Land east of Stowe Hill quarry). No account has been taken of the AQMA in Lydney, current level of NO2 pollution in Chepstow and Coleford, all of which are on routes used by HGVs to / from the Allocation site. The omission of this aspect conflicts with NPPF 124	these levels are close to or exceed the nationally approved limit, the Allocation Area 01 will be removed from the plan”.	existence of AQMAs and advises that affects upon on them should be a factor when assessing amenity. Specific concern raised regarding the plan’s allocations has been considered elsewhere under the response to Publication MLP policy MA01 and Appendix 4.	
802011/1/DM01/USND	Mr R S Crighton	Clerk Newland Parish Council	No	(2) Not justified (4) Not consistent with national policy	No	Policy DM01 (“Amenity”) is UNSOUND in respect of Allocation 01 (Land east of Stowe Hill quarry). No account has been taken of the AQMA in	Additional wording “Positive regard will be had to the levels of NO2 at the Lydney AQMA, in Chepstow and in Coleford and where these levels are	It is the view of the MPA that the policy provides a reasonable and proportionate approach to responding to the issue of amenity	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Lydney, current level of NO2 pollution in Chepstow and Coleford, all of which are on routes used by HGVs to / from the Allocation site. The omission of this aspect conflicts with NPPF 124 Policy DM01 (“Amenity”) is UNSOUND in respect of Allocation 01 (Land east of Stowe Hill quarry). It is essential that a minimum 250m buffer zone be imposed between the curtilage boundary of any residential property and any quarry working, to ensure adequate protection of the local community. Such buffer zones were included in the 2014 version of the plan but have been excluded in this version. The exclusion of such buffer zones conflicts with NPPF 143 (bullet point 6). NPPF 144 (bullet point 3).	close to or exceed the nationally approved limit, the Allocation Area 01 will be removed from the plan”. The inclusion of a clause to the effect that a 250m buffer zone will apply, to comply with NPPF 143 & 144	protection. In respect of air quality matters, the supporting text to the policy specifically refers to the existence of AQMAs and advises that affects upon on them should be a factor when assessing amenity. Specific concern raised regarding the plan’s allocations has been considered elsewhere under the response to Publication MLP policy MA01 and Appendix 4.	
1169771/10/DM01/USND	Mr Michael Krier	Chairman Temple Guiting Parish Council	No			Amenity We welcome the recognition in		It is the view of the MPA that the policy provides a	No modifications are considered necessary in

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						paragraph 268 which states “local communities within Gloucestershire and those of neighbouring administrative areas will be avoided, strictly controlled or mitigated so as to ensure unacceptable impacts will not arise in respect of noise, vibration, air pollution and visual intrusion”; likewise, Paragraph 278 which states “The impact of each noise emission should be considered against the existing acoustic environment and its noise sensitivity. Suitable control, the use of mitigation measures and the monitoring of noise levels will need to be identified. However,paragraph 291 relating to privacy stating: The siting of mineral developments in relation to neighbouring properties could result in the loss of privacy, usually through overlooking. Loss of privacy will normally be measured against		reasonable and proportionate approach to responding to the issue of amenity protection. In respect of any specific matters concerning privacy, the supporting text seeks to advise upon an achievable, proportionate and consistent way of assessment for all parties concerned..	response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						the amount of private space afforded to residential properties likely to be adversely affected.The effectiveness of the plan and wording is lost by the inclusion of the following wording of Paragraph 291. All sense of scale of impact is then lost by including statements on which parts of the house are included and should be deleted from the plan.			
793504/7/DM01/USND		Stanway Stone Company	No			Policy DM01 | Amenity The policy which 'applies a broad understanding of 'amenity'' is essentially as generalisation of NPPF policy and is of questionable assistance to operators. The text refers to applications being accompanied by thorough investigations with no meaningful guidance providing a local interpretation of national policy. The presentation of policy and text will allow the council to request		It is the view of the MPA that the supporting text to Publication MLP policy DM01 provides a reasonable steer for both applicants and decision makers in respect of the amenity matters likely to be of significance with minerals development. It also presents the various approaches that should be taken in responding to any potential risks of adverse impacts occurring. It is however,	**Possible Modifications –** **Under Publication MLP paragraph 281, 4th sentence after *"…planning practice guidance…"* replace *"…should be provided alongside…"* with *"may be necessary to support…"*** **Under Publication MLP paragraph 272, 2nd sentence replace the word *"…critical"* with *"important".* Also, add *"…referred to in national policy"***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						any assessment without a meaningful justification. For example Health Impact Assessments (para 272) are given prominence, there is a link to generic guidance which does not even mention minerals. Odour is referred to, this is not acknowledged problem with minerals sites, if it a problem in Gloucestershire what is the context? Establishing a Community liaison group is something that would be unlikely to meet the tests of planning conditions. Noise – if high levels of noise are generated but no receptors are nearby why does an activity need to be restricted? Lighting – 'not to breach acceptable levels', what does this mean? Extraction operations don't have lighting and associated mineral development, processing plant, have limited hours of operation in poor lighting conditions.		acknowledged that a number of minor revisions to the supporting text would assist with clarity.	**after "…matters" and delete *"…as required by national policy"*.** **Under Publication MLP paragraph 273, 1st sentence replace *"…should be carried out"* with *"…is recommended"*. Also, in the 2nd sentence replace *"…must"* with *"…should"*.**

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Privacy – what is meant by 'overlooking' as if a mineral site is in extreme close proximity to a property then surely there would be other greater amenity impacts. The above comments may seem flippant but they are to illustrate the point that the policy and text are not 'positive'. It is accepted that assessments may be justified in some instances but only when necessary and then proportionate to the nature and scale of development proposed and its location and receptors. But such qualification is not given nor any guidance in respect particular local circumstances.			
793895/7/DM01/USND	Respondent	Cotswold Stone Quarries	No			Policy DM01 | Amenity The policy which 'applies a broad understanding of 'amenity'' is essentially as generalisation of NPPF policy and is of questionable assistance to		It is the view of the MPA that the supporting text to Publication MLP policy DM01 provides a reasonable steer for both applicants and decision makers in respect of the amenity matters	**Possible Modifications –** **Under Publication MLP paragraph 281, 4th sentence after *"…planning practice guidance…"* replace *"…should be provided***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						operators. The text refers to applications being accompanied by thorough investigations with no meaningful guidance providing a local interpretation of national policy. The presentation of policy and text will allow the council to request any assessment without a meaningful justification. For example Health Impact Assessments (para 272) are given prominence, there is a link to generic guidance which does not even mention minerals. Odour is referred to, this is not acknowledged problem with minerals sites, if it a problem in Gloucestershire what is the context? Establishing a Community liaison group is something that would be unlikely to meet the tests of planning conditions. Noise – if high levels of noise are generated but no receptors are nearby why does an activity need to be restricted? Lighting –		likely to be of significance with minerals development. It also presents the various approaches that should be taken in responding to any potential risks of adverse impacts occurring. It is however, acknowledged that a number of minor revisions to the supporting text would assist with clarity.	***alongside…"*** **with** ***"may be necessary to support…"*** **Under Publication MLP paragraph 272, 2nd sentence replace the word** ***"…critical"*** **with** ***"important".*** **Also, add** ***"…referred to in national policy"*** **after "…matters" and delete** ***"…as required by national policy"*****.** **Under Publication MLP paragraph 273, 1st sentence replace** ***"…should be carried out"*** **with** ***"…is recommended"*****. Also, in the 2nd sentence replace** ***"…must"*** **with** ***"…should"*****.**

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						‘not to breach acceptable levels’, what does this mean? Extraction operations don’t have lighting and associated mineral development, processing plant, have limited hours of operation in poor lighting conditions. Privacy – what is meant by ‘overlooking’ as if a mineral site is in extreme close proximity to a property then surely there would be other greater amenity impacts. The above comments may seem flippant but they are to illustrate the point that the policy and text are not ‘positive’. It is accepted that assessments may be justified in some instances but only when necessary and then proportionate to the nature and scale of development proposed and its location and receptors. But such qualification is not given nor any guidance in respect particular local circumstances.			

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM01 (paragraphs 266-291) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
802358/9/DM01/USND	Respondent	Smiths (Gloucester) Ltd	No			Policy DM01 | Amenity The policy which 'applies a broad understanding of 'amenity'' is essentially as generalisation of NPPF policy and is of questionable assistance to operators. The text refers to applications being accompanied by thorough investigations with no meaningful guidance providing a local interpretation of national policy. The presentation of policy and text will allow the council to request any assessment without a meaningful justification. For example Health Impact Assessments (para 272) are given prominence, there is a link to generic guidance which does not even mention minerals. Odour is referred to, this is not acknowledged problem with minerals sites, if it a problem in Gloucestershire what is the context? Establishing a Community liaison		It is the view of the MPA that the supporting text to Publication MLP policy DM01 provides a reasonable steer for both applicants and decision makers in respect of the amenity matters likely to be of significance with minerals development. It also presents the various approaches that should be taken in responding to any potential risks of adverse impacts occurring. It is however, acknowledged that a number of minor revisions to the supporting text would assist with clarity.	**Possible Modifications –** **Under Publication MLP paragraph 281, 4th sentence after *"…planning practice guidance…"* replace *"…should be provided alongside…"* with *"may be necessary to support…"*** **Under Publication MLP paragraph 272, 2nd sentence replace the word *"…critical"* with *"important".* Also, add *"…referred to in national policy"* after "…matters" and delete *"…as required by national policy"*.** **Under Publication MLP paragraph 273, 1st sentence replace *"…should be carried out"* with *"…is recommended"*. Also, in the 2nd sentence replace *"…must"* with *"…should"*.**

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						group is something that would be unlikely to meet the tests of planning conditions. Noise – if high levels of noise are generated but no receptors are nearby why does an activity need to be restricted? Lighting – 'not to breach acceptable levels', what does this mean? Extraction operations don't have lighting and associated mineral development, processing plant, have limited hours of operation in poor lighting conditions. Privacy – what is meant by 'overlooking' as if a mineral site is in extreme close proximity to a property then surely there would be other greater amenity impacts. The above comments may seem flippant but they are to illustrate the point that the policy and text are not 'positive'. It is accepted that assessments may be justified in some instances but only when necessary and			

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						then proportionate to the nature and scale of development proposed and its location and receptors. But such qualification is not given nor any guidance in respect particular local circumstances.			

Matters related to Policy DM02 | Cumulative Impact

Publication MLP Consultation Questionnaire Reference | Questions 40.1, 40.2, 40.3, 40.4, 40.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM02 | Cumulative impact is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM02 | Cumulative impact is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1038720/39/DM02/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
794030/8/DM02/USND	Respondent	Syreford Quarries & Masonry Ltd	No			Policy DM02 | Cumulative impact Again this is a generalised policy with no meaningful guidance/interpretation. Given that the purpose of a local plan is to identify local circumstances and address policy appropriately, the policy and text has not identified areas where there is considered to be intensified mineral development i.e. where there is an existing number of mineral sites in a locality and further development will involve considerations of cumulative impact. Therefore the words 'and / or from a number of minerals and non-mineral developments in the locality' should be deleted from DM02.		It is the view of the MPA that the approach to cumulative impact accords fully with national policy. A lack of local distinctiveness by virtue of not identifying localities within Gloucestershire that could potentially be subject to cumulative impact matters is not a justified argument to necessitate the policy revisions proposed. The focus of the Publication MLP is squarely upon assessing the acceptably of future proposals for which the presence of possible cumulative impacts is unknown. Areas of intensified working presently will evolve over time and balanced judgements over cumulative impacts should therefore be made	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM02 | Cumulative impact is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM02 | Cumulative impact is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								on a case-by-case basis drawn from facts established at that time.	
820738/8/DM02/USND	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd	No			Policy DM02 | Cumulative impact Again this is a generalised policy with no meaningful guidance/interpretation. Given that the purpose of a local plan is to identify local circumstances and address policy appropriately, the policy and text has not identified areas where there is considered to be intensified mineral development i.e. where there is an existing number of mineral sites in a locality and further development will involve considerations of cumulative impact. Therefore the words 'and / or from a number of minerals and non-mineral developments in the locality' should be deleted from DM02.		It is the view of the MPA that the approach to cumulative impact accords fully with national policy. A lack of local distinctiveness by virtue of not identifying localities within Gloucestershire that could potentially be subject to cumulative impact matters is not a justified argument to necessitate the policy revisions proposed. The focus of the Publication MLP is squarely upon assessing the acceptably of future proposals for which the presence of possible cumulative impacts is unknown. Areas of intensified working presently will evolve over time and balanced judgements over cumulative impacts should therefore be made on a case-by-case basis drawn from facts established at that time.	No modifications are considered necessary in response to the representation.
1164737/39/DM02/SND	Mr	Assistant Estates	Yes		Yes	Not applicable.	Not applicable.	The representation,	No modifications are

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM02 | Cumulative impact is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM02 | Cumulative impact is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
	Matthew Cuthbert	Surveyor Aggregate Industries						which considers this matter to be 'sound' and 'legally compliant', is noted.	considered necessary in response to the representation.
794755/19/DM02/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
793504/8/DM02/USND		Stanway Stone Company	No			Policy DM02 | Cumulative impact Again this is a generalised policy with no meaningful guidance/interpretation. Given that the purpose of a local plan is to identify local circumstances and address policy appropriately, the policy and text has not identified areas where there is considered to be intensified mineral development i.e. where there is an existing number of mineral sites in a locality and further development will involve considerations of cumulative impact. Therefore the words 'and / or from a number of minerals and non-mineral developments in the locality' should be deleted from DM02.		It is the view of the MPA that the approach to cumulative impact accords fully with national policy. A lack of local distinctiveness by virtue of not identifying localities within Gloucestershire that could potentially be subject to cumulative impact matters is not a justified argument to necessitate the policy revisions proposed. The focus of the Publication MLP is squarely upon assessing the acceptably of future proposals for which the presence of possible cumulative impacts is unknown. Areas of intensified working presently will evolve over time and balanced judgements over cumulative impacts should	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM02 | Cumulative impact is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM02 | Cumulative impact is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								therefore be made on a case-by-case basis drawn from facts established at that time.	
793895/8/DM02/USND	Respondent	Cotswold Stone Quarries	No			Policy DM02 | Cumulative impact Again this is a generalised policy with no meaningful guidance/interpretation. Given that the purpose of a local plan is to identify local circumstances and address policy appropriately, the policy and text has not identified areas where there is considered to be intensified mineral development i.e. where there is an existing number of mineral sites in a locality and further development will involve considerations of cumulative impact. Therefore the words 'and / or from a number of minerals and non-mineral developments in the locality' should be deleted from DM02.		It is the view of the MPA that the approach to cumulative impact accords fully with national policy. A lack of local distinctiveness by virtue of not identifying localities within Gloucestershire that could potentially be subject to cumulative impact matters is not a justified argument to necessitate the policy revisions proposed. The focus of the Publication MLP is squarely upon assessing the acceptably of future proposals for which the presence of possible cumulative impacts is unknown. Areas of intensified working presently will evolve over time and balanced judgements over cumulative impacts should therefore be made on a case-by-case basis drawn from facts established at that time.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM02 | Cumulative impact is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM02 | Cumulative impact is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
802358/10/DM02/USND	Respondent	Smiths (Gloucester) Ltd	No			Policy DM02 | Cumulative impact Again this is a generalised policy with no meaningful guidance/interpretation. Given that the purpose of a local plan is to identify local circumstances and address policy appropriately, the policy and text has not identified areas where there is considered to be intensified mineral development i.e. where there is an existing number of mineral sites in a locality and further development will involve considerations of cumulative impact. Therefore the words 'and / or from a number of minerals and non-mineral developments in the locality' should be deleted from DM02.		It is the view of the MPA that the approach to cumulative impact accords fully with national policy. A lack of local distinctiveness by virtue of not identifying localities within Gloucestershire that could potentially be subject to cumulative impact matters is not a justified argument to necessitate the policy revisions proposed. The focus of the Publication MLP is squarely upon assessing the acceptably of future proposals for which the presence of possible cumulative impacts is unknown. Areas of intensified working presently will evolve over time and balanced judgements over cumulative impacts should therefore be made on a case-by-case basis drawn from facts established at that time.	No modifications are considered necessary in response to the representation.

Matters related to the supporting text to Policy DM02 | Cumulative Impact

Publication MLP Consultation Questionnaire Reference | Questions 41.1, 41.2, 41.3, 41.4, 41.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM02 (paragraphs 292-296) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM02 (paragraphs 292-296) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/40/DM02/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1169771/11/DM02/COM	Mr Michael Krier	Chairman Temple Guiting Parish Council				We welcome the inclusion of wording in para 292 (DMO2) regarding cumulative impacts and the emphasis contained in DMO9 in this regard. Cumulative Impact Minerals Plan Paragraph 292: The inclusion of comments on cumulative impact is welcomed. Clarification is needed on what baseline studies have been carried out and the basis for these and future studies. From discussion with the Minerals Team, it is currently understood that no cumulative impact assessment has been carried out for multiple quarrying activities in our area of the Cotswold		The support afforded to Publication MLP paragraph 292 is noted. The query concerning the carrying out of proactive baseline studies of cumulative impact is also acknowledged. However, the MPA does not deemed it necessary at this time to undertake such studies as part of the proportionate evidence base to support the MLP. The purpose of the policy is to ensure this matter is given due consideration with future proposals. The risk of possible cumulative impacts can evolve over time and therefore should be addressed appropriately on a case-by-case basis.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM02 (paragraphs 292-296) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM02 (paragraphs 292-296) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						AONB. That that there is no legal requirement and, more important, there has been no funding to do this, though funds could potentially come from the mineral levy			
1038720/40/DM02/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Matters related to Policy DM03 | Transport

Publication MLP Consultation Questionnaire Reference | Questions 42.1, 42.2, 42.3, 42.4, 42.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM03 | Transport is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM03 | Transport is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer Response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
854632/2/DM03/USND	Mr Saleem Shamash		No	(4) Not consistent with national policy	Yes	As I have articulated in earlier consultation rounds the plan remains unsound because it fails to take into account national policy and objectives to ensure the costs and impacts of development are adequately picked up by the developer. These include wear and tear on the public highway and this issue is captured in the current Minerals Local Plan. Since the adoption of that plan, the justification and need for such a policy requirement has increased and not decreased. This point was conceded and accepted by Wilshire Council and the Inspector at the hearing into their Mineral Local Plan in relation to their corresponding policy.	Policy DM03 should expressly require wear appropriate obligations to make proportionate contributions towards the undue wear and tear to the public highway caused by the heavy lorries that service mineral operations. This point was conceded and accepted by Wilshire Council and the Inspector at the hearing into their Mineral Local Plan in relation to their corresponding policy.	It is the view of the MPA that it is unnecessary for Publication Policy DM03 to expressly require contributions towards wear and tear. Whilst it is acknowledged to be a valid and potentially important planning matter, it is already incorporated in policy under the Part b clauses. Wear and tear contributions may be a wholly appropriate measure for ensuring public safety will not be affected and / or the function of highway network will not be subjected to unacceptable impacts.	The representation, which considers this matter to be 'sound', and "legally complaint" is noted.
852145/13/DM03/USND	Mr Nigel Gibbons	Forest of Dean District Council	No	(3) Not effective		Although the phrase in DM03 part a "Mineral development proposals will be permitted that use	How does the plan need changing? The phrase "Mineral development proposals will be	It is acknowledged by the MPA that Publication MLP Policy DM03 would benefit from a	**Possible Modifications –** **Under Part a | Alternatives to road**

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM03 | Transport is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM03 | Transport is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer Response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						more sustainable, alternative modes of non-road transport" is understood to mean that such means of transport will be encouraged and that where permitted mineral development should where possible use them, it is not expressed as clearly as it could be. The policy intention is supported but it is considered that it could be amended.	permitted that use more sustainable, alternative modes of non-road transport" should be replaced by "Mineral development should where possible use more sustainable alternative forms of transport"	revision to better state the ambition to support increasing take up of more sustainable forms of transporting minerals and associated activities.	**transport, revise the entire text so that it reads; *"Mineral development proposals will be permitted where it is demonstrated that road based transport will be minimised and that where possible, alternative and more sustainable modes of transport will be used."***
1164737/41/DM03/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound', and "legally complaint" is noted.	No modifications are considered necessary in response to the representation.
820738/9/DM03/USND	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd	No			Policy DM03 | Transport The overall tenet of the policy does not sit well with the NPPF which refers to 'severe' impact. Part A of DM03 is fairly generic and it is questionable if this offers any sort of positive policy support to alternatives to road transportation noting the text (para 301)refers to having to be acceptable in planning terms.		It is acknowledged by the MPA that Publication MLP Policy DM03 would benefit from a revision to better state the ambition to support increasing take up of more sustainable forms of transporting minerals and associated activities. The suggested change to Part c is also acknowledged as a reasonable revision to take forward.	**Possible Modifications –** **Under Part a | Alternatives to road transport, revise the entire text so that it reads; *"Mineral development proposals will be permitted where it is demonstrated that road based transport will be minimised and that where possible, alternative and more sustainable***

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM03 | Transport is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM03 | Transport is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer Response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Part C should omit the word 'only' as it is not necessary and relevant text does encourage and acknowledge whilst some ProW impacts may be adverse impacts these impacts can be temporary and/or be outweighed by other meaningful benefits to the ProW network such as new routes minerals developments can deliver but this needs to be included in the policy.			***modes of transport will be used."*** **Under Part c remove *"…only"* after "*Minerals developments proposals will…"***
794030/9/DM03/USND	Respondent	Syreford Quarries & Masonry Ltd	No			Policy DM03 | Transport The overall tenet of the policy does not sit well with the NPPF which refers to 'severe' impact. Part A of DM03 is fairly generic and it is questionable if this offers any sort of positive policy support to alternatives to road transportation noting the text (para 301)refers to having to be acceptable in planning terms. Part C should omit the word 'only' as it is not necessary and		It is acknowledged by the MPA that Publication MLP Policy DM03 would benefit from a revision to better state the ambition to support increasing take up of more sustainable forms of transporting minerals and associated activities. The suggested change to Part c is also acknowledged as a reasonable revision to take forward.	**Possible Modifications –** **Under Part a | Alternatives to road transport, revise the entire text so that it reads;** ***"Mineral development proposals will be permitted where it is demonstrated that road based transport will be minimised and that where possible, alternative and more sustainable modes of transport will be used."***

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM03 | Transport is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM03 | Transport is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer Response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						relevant text does encourage and acknowledge whilst some ProW impacts may be adverse impacts these impacts can be temporary and/or be outweighed by other meaningful benefits to the ProW network such as new routes minerals developments can deliver but this needs to be included in the policy.			**Under Part c remove *"…only"* after "*Minerals developments proposals will…"***
1028219/16/DM03/USND	Ms Nicola Packer		No			302 On site processing may make pollution worse for Tufa Dam SSSI	Delete land east of Stowe Hill.	It is the view of the MPA that the policy provides a reasonable and proportionate approach to responding to transport issues Specific concern raised regarding the plan's allocations has been considered elsewhere under the response to Publication MLP policy MA01 and Appendix 4.	No modifications are considered necessary in response to the representation.
924705/8/DM03/USND	Respondent	Head of Estates & Planning Breedon Aggregates	No			Policy DM03. The wording on transport impact does not reflect the NPPF test, where a severe impact has to occur before it can be used		It is the view of the MPA that the policy provides a reasonable and proportionate approach to responding to	**Possible Modification –** **Under Part a | Alternatives to road transport, revise the entire text so**

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM03 | Transport is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM03 | Transport is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer Response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						as a reason to refuse permission. Paragraph 303 in contrast, acknowledges this test. Also this Policy does not recognise that mitigation may not always be achievable. This removes the ability to weigh, in the planning balance, negative micro impacts that cannot be mitigated against the positive macro benefits a development might provide to the wider community.		transport issues. However, it is acknowledged that the policy would benefit from a revision to better state the ambition to support increasing take up of more sustainable forms of transporting minerals and associated activities.	**that it reads; *"Mineral development proposals will be permitted where it is demonstrated that road based transport will be minimised and that where possible, alternative and more sustainable modes of transport will be used."***
808023/15/DM03/USND	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd	No			Policy DM03 – the wording on transport impact should reflect the NPPF, where a severe impact has to occur before it can be used as a reason to refuse permission, rather than the term unacceptable.		It is the view of the MPA that the policy provides a reasonable and proportionate approach to responding to transport issues. The Part b clauses adequately respond to the concern raised over the assessment of impacts.	No modifications are considered necessary in response to the representation.
858234/2/DM03/SND	Respondent	Highways England	Yes		Yes		Mineral developments are heavily reliant on the strategic and local highway networks. They allow for the hauling	The representation, which considers this matter to be 'sound', and "legally complaint" is noted.	No modifications are considered necessary in response to the representation.

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							of minerals to markets, or for further processing, and provide a means for staff and customers can gain access. Policy DM03 of the MLP sets out the policy requirements of the Plan in relation to the identification of new sites. The policy comprises three parts that set out transport requirements, with the key priorities of each set out below: • Part a | Alternatives to road transport - which gives preference to sustainable sites with alternatives to road transport; • Part b | Highway Network - mineral development proposals will only be permitted where safety is not adversely affected and it can be demonstrated – I. unacceptable impacts on the capacity and function of the strategic and local highway networks		

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							will be avoided or satisfactorily mitigated; and II. any unavoidable adverse impacts on the capacity and function of the strategic and local highway networks will not be severe. • Part c | Public Rights of Way (ProW) Network and open access land Mineral development proposals will only be permitted where it can be demonstrated that public rights of way routes and / or open access land will be retained and their safe use maintained, and unacceptable adverse impacts will be avoided or satisfactory mitigated, etc. Paragraphs 301 to 310 of Section 10 'Development Management' covering transport, refers to the SRN in the identification of new mineral sites. The chapter states that sites should 'avoid adverse		

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							impacts on Gloucestershire's local and strategic highway networks' and that these should 'minimise the amount of vehicular movements' linked to a proposal site. The MLP requires that existing non-road modes of transport, such as rail and inland waterways and port facilities be used wherever possible. For sites anticipated to utilise the local and / or SRN, the MLP requests that potential adverse impacts arising be carefully scrutinised. Impacts relate to network capacity; maintenance, safety of road users, debris on the highway and related amenity impacts such as noise, dust, vehicular vibration, and air and water pollution. In addition, opportunities to reduce impacts on the highway networks resulting from staff / and or site visitors should		

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							be investigated. The Plan states that 'the Local Highway Authority and / or Highways England, who are responsible for stretches of the local and SRN within Gloucestershire, should be contacted by prospective applicants, where highway networks could be affected'. This will help to establish as early as possible whether a Transport Assessment is required to support a planning application submission for the proposals, and to determine the requirement for any subsequent highway assessment. In the event that unacceptable adverse impacts are identified, information on the measures necessary to satisfactorily mitigate these impacts will be required. Mitigation measures to this		

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							effect might include location specific infrastructure improvements. Physical schemes may incorporate junction improvements and traffic management, road widening along stretches of the highway, increasing visibility around site accesses and / or the construction of new accesses or junctions. The MLP states that route management plans that formally designate freight routes for mineral developments may also be sought, particularly where more sensitive sections of the highway could be exposed to minerals-related traffic such as HGVs or ELVs (Extra Long Vehicles). Critical to any new designated route will be the ability to maintain highway safety, and avoid environmental damage and / or loss of amenity for local communities.		

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							Sensitive receptors both within and outside of the county should be safeguarded to prevent unacceptable harm from occurring. Highways England believes that MLP makes appropriate reference to the SRN and includes policies and objectives that require any new mineral site considerations to consult Highways England. These, like any new development, would be required to submit a planning application submission, with transport evidence, and if necessary mitigation, presented to support the proposals and to offset any severe development impacts identified for the SRN Highways England is of the view that the scale of mitigation likely to be required to offset development		

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							impacts in the context of the Plan, will be within the ability of site owners/operators to fund.		
1038720/41/DM03/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound', and "legally complaint" is noted.	No modifications are considered necessary in response to the representation.
802358/11/DM03/USND	Respondent	Smiths (Gloucester) Ltd	No			Policy DM03 | Transport The overall tenet of the policy does not sit well with the NPPF which refers to 'severe' impact. Part A of DM03 is fairly generic and it is questionable if this offers any sort of positive policy support to alternatives to road transportation noting the text (para 301)refers to having to be acceptable in planning terms. Part C should omit the word 'only' as it is not necessary and relevant text does encourage and acknowledge whilst some ProW impacts may be adverse impacts these impacts can be temporary and/or be		It is acknowledged by the MPA that Publication MLP Policy DM03 would benefit from a revision to better state the ambition to support increasing take up of more sustainable forms of transporting minerals and associated activities. The suggested change to Part c is also acknowledged as a reasonable revision to take forward.	**Possible Modifications –** **Under Part a | Alternatives to road transport, revise the entire text so that it reads;** ***"Mineral development proposals will be permitted where it is demonstrated that road based transport will be minimised and that where possible, alternative and more sustainable modes of transport will be used."*** **Under Part c remove** ***"…only"*** **after "***Minerals developments proposals will…"*

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						outweighed by other meaningful benefits to the ProW network such as new routes minerals developments can deliver but this needs to be included in the policy.			
793504/9/DM03/USND		Stanway Stone Company	No			Policy DM03 | Transport The overall tenet of the policy does not sit well with the NPPF which refers to 'severe' impact. Part A of DM03 is fairly generic and it is questionable if this offers any sort of positive policy support to alternatives to road transportation noting the text (para 301)refers to having to be acceptable in planning terms. Part C should omit the word 'only' as it is not necessary and relevant text does encourage and acknowledge whilst some ProW impacts may be adverse impacts these impacts can be temporary and/or be outweighed by other meaningful benefits to the ProW network		It is acknowledged by the MPA that Publication MLP Policy DM03 would benefit from a revision to better state the ambition to support increasing take up of more sustainable forms of transporting minerals and associated activities. The suggested change to Part c is also acknowledged as a reasonable revision to take forward.	**Possible Modifications –** **Under Part a | Alternatives to road transport, revise the entire text so that it reads;** ***"Mineral development proposals will be permitted where it is demonstrated that road based transport will be minimised and that where possible, alternative and more sustainable modes of transport will be used."*** **Under Part c remove** ***"…only"*** **after "*Minerals developments proposals will…"***

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						such as new routes minerals developments can deliver but this needs to be included in the policy.			
793895/9/DM03/USND	Respondent	Cotswold Stone Quarries	No			Policy DM03 | Transport The overall tenet of the policy does not sit well with the NPPF which refers to 'severe' impact. Part A of DM03 is fairly generic and it is questionable if this offers any sort of positive policy support to alternatives to road transportation noting the text (para 301)refers to having to be acceptable in planning terms. Part C should omit the word 'only' as it is not necessary and relevant text does encourage and acknowledge whilst some ProW impacts may be adverse impacts these impacts can be temporary and/or be outweighed by other meaningful benefits to the ProW network such as new routes minerals developments can		It is acknowledged by the MPA that Publication MLP Policy DM03 would benefit from a revision to better state the ambition to support increasing take up of more sustainable forms of transporting minerals and associated activities. The suggested change to Part c is also acknowledged as a reasonable revision to take forward.	**Possible Modifications –** **Under Part a | Alternatives to road transport, revise the entire text so that it reads;** ***"Mineral development proposals will be permitted where it is demonstrated that road based transport will be minimised and that where possible, alternative and more sustainable modes of transport will be used."*** **Under Part c remove** ***"…only"*** **after "***Minerals developments proposals will…"*

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						deliver but this needs to be included in the policy.			
794755/20/DM03/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.

Matters related to the supporting text to Policy DM03 | Transport

Publication MLP Consultation Questionnaire Reference | Questions 43.1, 43.2, 43.3, 43.4, 43.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM03 (paragraphs 297-313) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM03 (paragraphs 297-313) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer Response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
808023/16/DM03/COM	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd				Para 303 – acknowledges test is severe impact, so the Policy wording should too.		The MPA acknowledged the comment made. Although contest the point that policy doesn't refer to 'severe'. It is set out in part b ,clause II	No modifications are considered necessary in response to the representation.
1038720/42/DM03/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and "legally compliant", is noted.	No modifications are considered necessary in response to the representation.
802358/12/DM03/USND	Respondent	Smiths (Gloucester) Ltd	No			Paragraphs 308 to 310 do not appear in line with national guidance, NPPF para 32 severe impact, and refer to matters which are not defined. There is no definition of sensitive receptors in terms of traffic movements withstanding that this could be at some distance from the actual mineral development which is not a reasonable matter to consider or condition on a planning application.		It is the view of the MPA that the supporting text to Publication MLP policy DM03 is reasonable and proportionate in offering advice to applicant and decision makers. In respect of the text set out in paragraphs 308 to 310 this acknowledges local context such as communities along certain routes potentially being adversely impacted; that some mineral developments are located near to the county boundary; and that not all, unavoidable routes	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM03 (paragraphs 297-313) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM03 (paragraphs 297-313) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer Response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								are suitable to usually accommodate mineral traffic.	
793504/10/DM03/UNSD		Stanway Stone Company	No			Paragraphs 308 to 310 do not appear in line with national guidance, NPPF para 32 severe impact, and refer to matters which are not defined. There is no definition of sensitive receptors in terms of traffic movements withstanding that this could be at some distance from the actual mineral development which is not a reasonable matter to consider or condition on a planning application.		It is the view of the MPA that the supporting text to Publication MLP policy DM03 is reasonable and proportionate in offering advice to applicant and decision makers. In respect of the text set out in paragraphs 308 to 310 this acknowledges local context such as communities along certain routes potentially being adversely impacted; that some mineral developments are located near to the county boundary; and that not all, unavoidable routes are suitable to usually accommodate mineral traffic.	No modifications are considered necessary in response to the representation.
793895/10/DM03/USND	Respondent	Cotswold Stone Quarries	No			Paragraphs 308 to 310 do not appear in line with national guidance, NPPF para 32 severe impact, and refer to matters which are not defined. There is no definition of sensitive receptors in		It is the view of the MPA that the supporting text to Publication MLP policy DM03 is reasonable and proportionate in offering advice to applicant and decision makers. In	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM03 (paragraphs 297-313) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM03 (paragraphs 297-313) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer Response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						terms of traffic movements withstanding that this could be at some distance from the actual mineral development which is not a reasonable matter to consider or condition on a planning application.		respect of the text set out in paragraphs 308 to 310 this acknowledges local context such as communities along certain routes potentially being adversely impacted; that some mineral developments are located near to the county boundary; and that not all, unavoidable routes are suitable to usually accommodate mineral traffic.	
854632/3/DM03/USND	Mr Saleem Shamash		No	(4) Not consistent with national policy	Yes	The changes required to Policy DM03 should be properly underpinned in the reasoned justification.	The changes required to Policy DM03 is reasonable and proportionate in offering advice to applicant and decision makers. However, it is acknowledged that the supporting text under paragraphs and 303 and 307 would benefit from further clarification particularly in respect of concern over relevant planning provisions to deal with highway maintenance (e.g. matters of	It is the view of the MPA that the supporting text to Publication MLP policy DM03 is reasonable and proportionate in offering advice to applicant and decision makers. However, it is acknowledged that the supporting text under paragraphs and 303 and 307 would benefit from further clarification particularly in respect of concern over relevant planning provisions to deal with highway maintenance (e.g. matters of	**Possible Modifications –** **Under Publication MLP paragraph 303, 3rd sentence replace *"…issues likely to be scrutinised"* with *"…issues that should be considered…"* Also, delete *"…maintenance"* and replace with *"…the impact upon the normal cycle of programmed highway maintenance"*** **Under Publication MLP paragraph 307, 2nd sentence after**

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM03 (paragraphs 297-313) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM03 (paragraphs 297-313) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer Response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								attributable, additional wear and tear).	***"…highway network"* add *"…including, where justified to cover additional maintenance requirements."***
852145/14/DM03/COM	Mr Nigel Gibbons	Forest of Dean District Council				any consequential changes arising from policy amendment		The MPA acknowledge the comment made.	No modifications are considered necessary in response to the representation.
1164737/42/DM03/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally complaint', is noted.	No modifications are considered necessary in response to the representation.
1169771/12/DM03/USND	Mr Michael Krier	Chairman Temple Guiting Parish Council	No			Transport and road infrastructure Policy DM03 Transport makes some reference to the impact on local highway networks but doesn't currently capture or highlight the intent referenced in Paragraph 301. Constant complaints of quarry dust and mud on local highways, combined with HGVs using narrow county lanes has led to extensive damage to verges and road surfaces. Plans should also anticipate what happens when primary designated routes for HGVs are		It is the view of the MPA that the supporting text to Publication MLP policy DM03 is reasonable and proportionate in offering advice to applicant and decision makers. In respect of the text set out in paragraph 301, revisions have proposed to the policy, which align better with this paragraph.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM03 (paragraphs 297-313) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM03 (paragraphs 297-313) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer Response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						subjected to road closure notices.			
820738/10/DM03/USND	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd	No			Paragraphs 308 to 310 do not appear in line with national guidance, NPPF para 32 severe impact, and refer to matters which are not defined. There is no definition of sensitive receptors in terms of traffic movements withstanding that this could be at some distance from the actual mineral development which is not a reasonable matter to consider or condition on a planning application.		It is the view of the MPA that the supporting text to Publication MLP policy DM03 is reasonable and proportionate in offering advice to applicant and decision makers. In respect of the text set out in paragraphs 308 to 310 this acknowledges local context such as communities along certain routes potentially being adversely impacted; that some mineral developments are located near to the county boundary; and that not all, unavoidable routes are suitable to usually accommodate mineral traffic.	No modifications are considered necessary in response to the representation.
794030/10/DM03/USND	Respondent	Syreford Quarries & Masonry Ltd	No			Paragraphs 308 to 310 do not appear in line with national guidance, NPPF para 32 severe impact, and refer to matters which are not defined. There is no definition of sensitive receptors in terms of traffic movements		It is the view of the MPA that the supporting text to Publication MLP policy DM03 is reasonable and proportionate in offering advice to applicant and decision makers. In respect of the text set out in paragraphs	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM03 (paragraphs 297-313) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM03 (paragraphs 297-313) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer Response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						withstanding that this could be at some distance from the actual mineral development which is not a reasonable matter to consider or condition on a planning application.		308 to 310 this acknowledges local context such as communities along certain routes potentially being adversely impacted; that some mineral developments are located near to the county boundary; and that not all, unavoidable routes are suitable to usually accommodate mineral traffic.	

Matters related to Policy DM04 | Flood risk

Publication MLP Consultation Questionnaire Reference | Questions 44.1, 44.2, 44.3, 44.4, 44.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM04 | Flood risk is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM04 | Flood risk is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
924705/9/DM04/USND	Respondent	Head of Estates & Planning Breedon Aggregates	No			Policy DM04- Flood Risk. This Policy should not require development that is not at risk of flooding to demonstrate it is resilient to flooding.		It is the view of the MPA that all minerals development should be mindful of flood related matters. However, evidence requirements will need to be proportionate to the scale and significance of the issue and should not exclude matters of future resilience. Therefore, within a broad set of parameters (as directed by national policy and guidance) the amount of evidence provided should be assessed on a case-by-case basis. It is also worth noting that activities (such as mineral working) more often affect the hydrological characteristics of a site and can have a far reaching and different impacts at different localities beyond the boundaries of any application site. It is also the case that flood risk is becoming an	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM04 | Flood risk is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM04 | Flood risk is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								increasingly dynamic issue that is evolving over time, more often as a consequence of climate change. As such it is reasonable and justified to seek a response from proposed development, demonstrated through appropriate consideration of future resilience to flood risk.	
808023/17/DM04/COM	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd				Policy DM04 – why does a quarry that is not at risk of flooding need to demonstrate it is resilient to flooding, and more generally, why does any quarry ? – how can they provide flood compensation if they can't be in a flood zone? Wording is not meaningful		It is the view of the MPA that all minerals development should be mindful of flood related matters. However, evidence requirements will need to be proportionate to the scale and significance of the issue and should not exclude matters of future resilience. Therefore, within a broad set of parameters (as directed by national policy and guidance) the amount of evidence provided should be assessed on a case-by-case basis. It is also worth noting that activities (such as mineral working) more often affect the	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM04 | Flood risk is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM04 | Flood risk is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								hydrological characteristics of a site and can have a far reaching and different impacts at different localities beyond the boundaries of any application site. It is also the case that flood risk is becoming an increasingly dynamic issue that is evolving over time, more often as a consequence of climate change. As such it is reasonable and justified to seek a response from proposed development, demonstrated through appropriate consideration of future resilience to flood risk.	
1038720/43/DM04/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
794030/11/DM04/USND	Respondent	Syreford Quarries & Masonry Ltd	No			Policy DM04 | Flood risk DM04 appears as the generic national guidance		It is the view of the MPA that subject to an agreement on policy revisions with the Environment Agency (see Representation Reference: 1169920/2/DM04/USND) the approach taken is fully	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM04 | Flood risk is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM04 | Flood risk is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								compliant with national policy and guidance and is legally sound.	
820738/11/DM04/USND	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd	No			Policy DM04 | Flood risk DM04 appears as the generic national guidance		It is the view of the MPA that subject to an agreement on policy revisions with the Environment Agency (see Representation Reference: 1169920/2/DM04/USND) the approach taken is fully compliant with national policy and guidance and is legally sound.	No modifications are considered necessary in response to the representation.
852145/15/DM04/USND	Mr Nigel Gibbons	Forest of Dean District Council	No	(1) Not positively prepared (3) Not effective		Greater clarity in the wording of the above policy is considered necessary. At present although the intent of the policy is known the way in which it is expressed lacks clarity. It is intended that criteria I, II and III should be met presumably by all mineral development and therefore the policy should be amended as below.This improves clarity and hence effectiveness of the policy. Similarly, it is considered that the intent of the	Change main part of policy: “Mineral development proposals will be permitted, where it can be demonstrated” to “Mineral development proposals will only be permitted, where it can be demonstrated” In part a, change “will” to “may” so that it would read: …”Mineral development proposals may be permitted in flood zone 2 where it can be shown….	It is the view of the MPA that subject to an agreement on policy revisions with the Environment Agency (see Representation Reference: 1169920/2/DM04/USND) the approach taken is fully compliant with national policy and guidance and is legally sound.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM04 | Flood risk is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM04 | Flood risk is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						policy is to make clear that there are cases where development in flood zone 2 will be permitted, but only where a proposal is otherwise acceptable.			
1164737/43/DM04/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
794755/21/DM04/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
793504/11/DM04/USND		Stanway Stone Company	No			Policy DM04 | Flood risk DM04 appears as the generic national guidance		It is the view of the MPA that subject to an agreement on policy revisions with the Environment Agency (see Representation Reference: 1169920/2/DM04/USND) the approach taken is fully compliant with national policy and guidance and is legally sound.	No modifications are considered necessary in response to the representation.
793895/11/DM04/USND	Respondent	Cotswold Stone Quarries	No			Policy DM04 | Flood risk DM04 appears as the generic national guidance		It is the view of the MPA that subject to an agreement on policy revisions with the Environment Agency (see	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM04 | Flood risk is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM04 | Flood risk is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								Representation Reference: 1169920/2/DM04/USND) the approach taken is fully compliant with national policy and guidance and is legally sound.	
802358/13/DM04/USND	Respondent	Smiths (Gloucester) Ltd	No			Policy DM04 | Flood risk DM04 appears as the generic national guidance		It is the view of the MPA that subject to an agreement on policy revisions with the Environment Agency (see Representation Reference: 1169920/2/DM04/USND) the approach taken is fully compliant with national policy and guidance and is legally sound.	No modifications are considered necessary in response to the representation.
1169920/2/DM04/USND	Mark Davies	Environment Agency	No	(2) Not justified (3) Not effective (4) Not consistent with national policy		Policy DM04 Flood Risk The policy and supporting text mentions the sequential test and appropriateness linked to flood risk vulnerability. However it is considered that this is not accurate or necessary as it is in part a duplication of the advice within the flood risk vulnerability tables within the NPPG. Other adopted	You should remove inappropriate references to the flood risk sequential test for mineral development and the exception test. In terms of policy wording you could utilise the following wording: New development should seek to provide betterment in flood storage and to remove obstructions to flood flow routes where appropriate. New developments	It is acknowledged by the MPA that Publication MLP policy DM04 would benefit from further revisions. A Statement of Common Ground (SoCG) has been prepared involving the MPA and the Environment Agency to set out in detail policy changes that could form part of a request for formal modifications for consideration at examination.	**Possible Modification –** **Replacement of the Publication MLP Policy DM04 with the following: -** **Policy DM04 | Flood Risk** **Mineral development proposals will be permitted, where it can be demonstrated: -** **I. there will be**

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM04 | Flood risk is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM04 | Flood risk is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						minerals plans that we are aware of do not include such. Mineral sites are appropriate in floodplain, in line with the above, and are often welcomed due to the wider benefits that can be achieved in relation to catchment management. The use of the word exception test is also questioned as this only applies to more or highly vulnerable development. It is misleading for potential mineral site developers and future decision makers. You may wish to include a line about associated mineral activity such as processing plants which could be considered as 'less vulnerable' and ensuring these are safe from the potential impacts of flooding. However, we would question why mineral sites need to be resilient to the impacts of flooding? We support the references to flood risk betterment (flood	should: Conserve and enhance the ecological flood storage value of the water environment, including watercourse corridors.		**no increase in the risk of flooding on site and elsewhere from all sources of flooding now and in the future;** **II. wherever possible, flood risk reduction initiatives will be incorporated that will achieve a reduction in the risk of flooding overall;** **III. appropriate measures will be put in place to manage and wherever possible, reduce surface water run-off including through the use of sustainable drainage systems (SuDS);** **IV. wherever possible, a net increase in flood water storage capacity will be achieved;** **V. where applicable, flood flow routes will be improved such as through the removal of obstructions;** **VI. where**

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM04 | Flood risk is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM04 | Flood risk is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						risk reduction) opportunities (initiatives) but these could be made stronger within the policy text. We note the inclusion of FRA requirements. Climate Change information could be expanded upon.			**applicable, there will be no detriment to the integrity of existing flood defences and that access to allow for their future maintenance or improvement will not be impeded;** **VII. they accord with the policies contained in the River Severn, Severn Tidal Tributaries and Thames Catchment Flood Management Plans; and** **VIII. any mineral processing plant, associated building(s), or equipment should be designed to remain operational, safe for users, and flood resilient during a flood event.** **Mineral development proposals will only be permitted in areas of flood risk (Flood Risk Zones 2, 3a or 3b) having taken into account climate change, where they have passed the**

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM04 | Flood risk is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM04 | Flood risk is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
									Sequential Test and, where applicable, the Exception Test as set out in national policy. **Mineral development proposals involving sand and gravel working along with water compatible development may be appropriate within 'Flood Risk Zone 3b' or any identified 'functional floodplain', providing that: -** **• there will be no net loss in flood storage and flood risk reduction measures (betterment opportunities) are provided where possible;** **• there will be no impediment to water flow routes; and** **• any mineral processing plant, associated building(s), or equipment should be designed to remain operational,**

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM04 | Flood risk is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM04 | Flood risk is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
									safe for users, and flood resilient during a flood event. Mineral development proposals in areas of flood risk and where they exceed 1ha must be accompanied by a Flood Risk Assessment (FRA) that show how the risk of flooding on-site and elsewhere from all sources will not increase and, where possible could be reduced. The FRA must identify and assess the following: - • all current and future sources of flooding, appropriately taking into account the anticipated impacts of climate change; • how flood risk on-site and elsewhere will be effectively managed for the lifetime

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM04 | Flood risk is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM04 | Flood risk is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
									of the proposal including during site restoration and aftercare; and • **measures to prevent increased flood risk including through the use of sustainable drainage systems (SuDS) and compensatory works if any loss of flood storage capacity is expected to occur.**

Matters related to the supporting text to Policy DM04 | Flood risk

Publication MLP Consultation Questionnaire Reference | Questions 45.1, 45.2, 45.3, 45.4, 45.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM04 (paragraphs 314-327) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM04 (paragraphs 314-327) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1038720/44/DM04/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
852145/16/DM04/COM	Mr Nigel Gibbons	Forest of Dean District Council				changes arising from policy amendment may be necessary		It is not considered that the policy should be revised. However, should any revisions emerge through the examination process then the supporting text would be updated accordingly.	No modifications are considered necessary in response to the representation.
1169920/3/DM04/USND	Mark Davies	Environment Agency	No	(2) Not justified (3) Not effective (4) Not consistent with national policy		Policy DM04 Flood Risk The policy and supporting text mentions the sequential test and appropriateness linked to flood risk vulnerability. However it is considered that this is not accurate or necessary as it is in part a duplication of the advice within the flood risk vulnerability tables within the NPPG.	Paragraph 321 - The EA flood map for planning could be referenced within the information section of the supporting text. Paragraph 322 – Reference should be made to the latest climate change allowances guidance. Applicants should refer to Tables 1 and 2 of the Government's Climate Change Allowances guidance. You could say applications will need to take account of the effect of climate change on peak river flows and peak rainfall intensity as set out at Table 1 and Table 2 (respectively) of the Government's Climate Change Allowance guidance. This is available at:	It is acknowledged by the MPA that elements of the supporting text for Publication MLP policy DM04 would benefit from further revisions. A Statement of Common Ground (SoCG) has been prepared involving the MPA and the Environment Agency to set out in detail various changes that could form part of a request for formal	**Possible Modifications –** **Under the 3rd sentence of Publication MLP paragraph 321 after *"…prepared"* add *"…Flood Map for Planning".*** **Under Publication MLP paragraph 322 add a new 2nd sentence;** ***"Climate Change Allowances have been published by the Government***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM04 (paragraphs 314-327) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM04 (paragraphs 314-327) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Other adopted minerals plans that we are aware of do not include such. Mineral sites are appropriate in floodplain, in line with the above, and are often welcomed due to the wider benefits that can be achieved in relation to catchment management. The use of the word exception test is also questioned as this only applies to more or highly vulnerable development. It is misleading for potential mineral site developers and future decision makers. You may wish to include a line about associated mineral activity such as processing plants which could be considered as 'less vulnerable' and ensuring these are safe from the potential impacts of flooding. However, we would question why mineral sites	https://www.gov.uk/guidance/flood-riskassessments-climate-change-allowances; and seek contact with the Environment Agency for any detailed river catchment climate change data.	modifications for consideration at examination.	***and theses must be applied unless exceptional circumstances indicate alternative local assessments would be more appropriate. Engagement with the EA in respect of this matter will be necessary and should be undertaken at the earliest opportunity."*** **Also, in the 3rd sentence after "…development …" add *"…must form part of the assessment of flood risk…"* and delete *"…adhere to these requirements…"***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM04 (paragraphs 314-327) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM04 (paragraphs 314-327) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						need to be resilient to the impacts of flooding? We support the references to flood risk betterment (flood risk reduction) opportunities (initiatives) but these could be made stronger within the policy text. We note the inclusion of FRA requirements. Climate Change information could be expanded upon.			
1164737/44/DM04/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be ‘sound’ and ‘legally compliant’, is noted.	No modifications are considered necessary in response to the representation.

Matters related to Policy DM05 | Water resources

Publication MLP Consultation Questionnaire Reference | Questions 46.1, 46.2, 46.3, 46.4, 46.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1028219/17/DM05/USND	Ms Nicola Packer		No	(3) Not effective		The problem is that the quarrying company are doing the monitoring of the effects of quarrying and that Natural England are too stretched to police it. There should be no quarrying where there is a possibility of damage to water quality, especially near a SSSI such as Tufa Dams.	Omit land east of Stowe Hill Quarry.	It is the view of the MPA that a sufficiently detailed and proportionate policy framework has been provided to ensure that water resource matters will be effectively handled with new mineral development proposals. Specific concern regarding one or more of the plan's allocations and possible site-focused, hydrological matters do not form part of Publication MLP Policy DM05 or its supporting text.	No modifications are considered necessary in response to the representation.
855353/19/DM05/USND	Chris McFarling		No	(1) Not positively prepared (2) Not justified (3) Not effective (4) Not consistent with national policy	No	Please see earlier representations with respect to Allocation 01 - Stowe Hill Quarry		It is the view of the MPA that a sufficiently detailed and proportionate policy framework has been provided to ensure that water resource matters will be effectively	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								handled with new mineral development proposals. Specific concern regarding one or more of the plan's allocations and possible site-focused, hydrological matters do not form part of Publication MLP Policy DM05 or its supporting text.	
1038720/45/DM05/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1033898/2/DM05/USND	Mrs Mary Condrad		No	(2) Not justified (4) Not consistent with national policy	No	Policy DM05 ("Water Resources") is unsound in respect of allocation 01 (Land east of Stowe HIll quarry). This area corresponds exactly to the area which is the subject of a planning application (G.C.C. reference 15/0108/FDMAJM) which is still "live" but not under active consideration. In response to that application, which, by definition, must apply to the allocation of 01	Allocation Area 01 (Land east of Stowe Hill quarry) should be removed in its entirety from the minerals local plan.	It is the view of the MPA that a sufficiently detailed and proportionate policy framework has been provided to ensure that water resource matters will be effectively handled with new mineral development proposals. Specific concern regarding one or more of the	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						area (the same area), Natural England concluded that: "Natural England objects to this proposal. As submitted, we consider it will damage or destroy the interest features for which Slade Brooke site of Special Scientific interest has been notified. We have reached this view for the following reasons: - impacts on hydrology - impacts on epikarst and soil - inability of monitoring to adequately protect the SSI - inability of restoration to restore damage Since our previous response, we have explored mitigation options in some depth with the developers and the Environment Agency. It is our conclusion that there is no scope for amendments to the design of the proposal that could adequately avoid or mitigate the environmental harm from this proposal in this location. Fundamentally there is a high level of risk to the SSSI with no realistic mitigation option."		plan's allocations and possible site-focused, hydrological matters do not form part of Publication MLP Policy DM05 or its supporting text.	

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						The MLP itself states that "Avoiding derogation of the SSSI must be the primary focus". Thus to include this Allocation Area in the plan conflicts directly with Policy DM05 poits I, II and IV. There is further conflict with Policy DM06 (development within SSSIs) point II. There is direct conflict with NPPF 118 which states that "if significant harm..... cannot be avoided, adequately mitigated or... compensated for, then planning permission should be refused". The Precautionary Principle must apply. This is a supplementary response following advice received from Natural England and the Environment Agency. Policy DM05 ("Water Resources") is unsound in respect of allocation 01 (Land east of Stowe Hill quarry). There is a current planning application under consideration (GCC reference 17/0122/FDMAJM) for an extension to the area proposed. In response to that			

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						application which, by definition, must apply to the Allocation 01 area, Natural England, in their reponse dated 29 June 2018 have emphatically objected, saying: "Natural England objects to this proposal. As submitted we consider there is a high risk it will damage or destroy the interest features for which Slade Brook Site of Special Scientific Interest has been notified. We have reached this view for the following reasons: - impacts on hydrology - impacts on epikarst - inability of monitoring to adequately protect the SSSI - inability of restoration to repair damage In response to the same application the Environment Agency have stated: "At this time we would OBJECT to the proposed development as submitted. On the basis of current key concerns there may be irreversible adverse environmental impacts in EIA terms.... there may be more sustainable locations/sites for future			

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						extraction purposes..." The MLP itself states that "Avoiding derogation of the SSSI must be the primary focus" Thus, to include this Allocation Area in the plan conflicts directly with Policy DM05 points I, II and IV. There is further conflict with Policy DM06 (development within SSSIs) point !!. There is direct conflict with NPPF 118 which states that "if significant harm.... cannot be avoided, adequately mitigated or... compensated for, then planning permission should be refused". The Precautionary Principle must apply.			
802366/2/DM05/USND	Mr Dave Kent	West Dean Parish Council	No	(2) Not justified (4) Not consistent with national policy	No	Policy DM05 (“Water resources”) is UNSOUND in respect of Allocation 01 (Land east of Stowe Hill quarry). This area corresponds exactly with the area which is the subject of a planning application (Gloucestershire County Council reference 15/0108/FDMAJM) which is still ‘live’ but not under active consideration.	Allocation Area 01 (land east of Stowe Hill quarry) should be removed in its entirety from the Minerals Local Plan	It is the view of the MPA that a sufficiently detailed and proportionate policy framework has been provided to ensure that water resource matters will be effectively handled with new mineral development proposals. Specific concern regarding one or	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						In response to that application which must also apply to the Allocation 01 area, Natural England concluded that: “Natural England objects to this proposal. As submitted we consider it will damage or destroy the interest features for which Slade Brook Site of Special Scientific Interest has been notified. We have reached this view for the following reasons: • Impacts on hydrology; • Impacts on epikarst and soil; • Inability of monitoring to adequately protect the SSSI; • Inability of restoration to repair damage. Since our previous response, we have explored mitigation options in some depth with the developers and the Environment Agency. It is our conclusion that there is no scope for amendments to the design of the proposal that could adequately avoid or mitigate the environmental harm from this proposal in this location. Fundamentally there is a high level of risk to		more of the plan’s allocations and possible site-focused, hydrological matters do not form part of Publication MLP Policy DM05 or its supporting text.	

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						the SSSI with no realistic mitigation option". The MLP itself states that "Avoiding derogation of the SSSI must be the primary focus". Thus, to include this Allocation Area in the plan conflicts directly with Policy DM05 points I, II and IV. There is further conflict with Policy DM06 (development within SSSIs) point II. There is direct conflict with NPPF 118 which states that "if significant harm … cannot be avoided, adequately mitigated or … compensated for, then planning permission should be refused".			
794030/12/DM05/USND	Respondent	Syreford Quarries & Masonry Ltd	No			Policy DM05 | Water resources There is no definition of watercourses and given this can include field drainage ditches IV should be deleted or clarification provided.		It is the view of the MPA that whilst a sufficiently detailed and proportionate policy framework has been provided to ensure that water resource matters will be effectively handled with new mineral development proposals, the policy (and	**Possible Modifications –** **Under Publication MLP Policy DM05, add to the beginning of clause IV *'Unless justifiable and agreeable change is achievable'*** **Also, add a definition footnote for the term watercourse**

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								supporting text) would justifiably benefit from further clarification concerning the criteria that must be met by future applicants	***– "A watercourse is defined as any channel through which water flows. Watercourses can be natural or man made, open on the surface or enclosed. Watercourses serve to drain the land and can assist in supporting flora and fauna. They include rivers, brooks, becks, ditches, streams, leats, goyles, rhynes and culverts."*** **Under Publication MLP paragraph 337, 4th sentence, replace *"…are locate near to…"* with *"…that could affect…"* Also add two new sentences to the end of the paragraph; *"In the event that the integrity of a watercourse may be unavoidably affected, robust and credible evidence to justify this matter must be*****

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
									provided. All proposals under these circumstances will be rigorous scrutinised including consultation with the Environment Agency and / or the Lead Local Flood Authority to ensure that an acceptable and deliverable scheme is brought forward that will secure wherever possible, the minimum degree of change and / or alteration necessary.
820738/12/DM05/USND	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd	No			Policy DM05 | Water resources There is no definition of watercourses and given this can include field drainage ditches IV should be deleted or clarification provided.		It is the view of the MPA that whilst a sufficiently detailed and proportionate policy framework has been provided to ensure that water resource matters will be effectively handled with new mineral development proposals, the policy (and supporting text) would justifiably	**Possible Modifications –** **Under Publication MLP Policy DM05, add to the beginning of clause IV *'Unless justifiable and agreeable change is achievable'*** **Also, add a definition footnote for the term watercourse – *"A watercourse is defined as any***

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								benefit from further clarification concerning the criteria that must be met by future applicants	***channel through which water flows. Watercourses can be natural or man made, open on the surface or enclosed. Watercourses serve to drain the land and can assist in supporting flora and fauna. They include rivers, brooks, becks, ditches, streams, leats, goyles, rhynes and culverts."*** **Under Publication MLP paragraph 337, 4th sentence, replace *"…are locate near to…"* with *"…that could affect…"* Also add two new sentences to the end of the paragraph; *"In the event that the integrity of a watercourse may be unavoidably affected, robust and credible evidence to justify this matter must be provided. All proposals under***

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									these circumstances will be rigorous scrutinised including consultation with the Environment Agency and / or the Lead Local Flood Authority to ensure that an acceptable and deliverable scheme is brought forward that will secure wherever possible, the minimum degree of change and / or alteration necessary.
1042027/2/DM05/USND	Mr Christopher Wilderspin		No	(2) Not justified (4) Not consistent with national policy	No	Policy DM05 ("Water resources") is UNSOUND in respect of Allocation 01 (Land east of Stowe Hill quarry). This area corresponds exactly with the area which is the subject of a planning application (Gloucestershire County Council reference 15/0108/FDMAJM) which is still "live" but not under active consideration. In response to that application which, by definition, must apply to the Allocation 01 area,	Allocation Area 01 (land east of Stowe Hill quarry) should be removed in its entirety from the Minerals Local Plan.	It is the view of the MPA that a sufficiently detailed and proportionate policy framework has been provided to ensure that water resource matters will be effectively handled with new mineral development proposals. Specific concern regarding one or more of the plan's allocations and possible site-focused,	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						natural England concluded that: "Natural England objects to this proposal. As submitted we consider it will damage or destroy the interest features for which Slade Brook Site of Special Scientific Interest has been notified. We have reached this view for the following reasons: - impacts on hydrology - impacts on epikarst and soil - inability of monitoring to adequately protect the SSSI - inability of restoration to repair damage Since our previous response, we have explored mitigation options in some depth with the developers and the Environment Agency. It is our conclusion that there is no scope for amendments to the design of the proposal that could adequately avoid or mitigate the environmental harm from this proposal in this location. Fundamentally there is a high level of risk to the SSSI with no realistic mitigation option". The MLP itself states		hydrological matters do not form part of Publication MLP Policy DM05 or its supporting text.	

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						that "Avoiding derogation of the SSSI must be the primary focus". Thus, to include this Allocation Area in the plan conflicts directly with Policy DM05 points I, II and IV. There is a further conflict with Policy DM06 (development within SSSIs) point II. There is a direct conflict with NPPF 118 which states that "if significant harm.....cannot be avoided, adequately mitigated or... compensated for, then planning permission should be refused"> The Precautionary Principle must apply.			
852145/17/DM05/USND	Mr Nigel Gibbons	Forest of Dean District Council	No	(1) Not positively prepared (3) Not effective		Greater clarity in the wording of the above policy is considered necessary. At present although the intent of the policy is known the way in which it is expressed lacks clarity.	Change “Mineral development proposals will be permitted where it can be demonstrated:” to “Mineral development proposals will be only permitted where it can be demonstrated (that)”.	Comments noted with regards to soundness. However, the proposed changes are not accepted. The proposed changes are less consistent with the NPPF’s presumption in favour of sustainable development.	No modifications are considered necessary in response to the representation.
1164737/45/DM05/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be	No modifications are considered necessary in response to the

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								‘sound’ and ‘legally compliant’, is noted.	representation.
802393/2/DM05/USND	Ms A Lapington	Coleford Town Council	No	(2) Not justified (4) Not consistent with national policy	No	Policy DM05 (“Water resources”) is UNSOUND in respect of Allocation 01 (Land east of Stowe Hill quarry). This area corresponds exactly with the area which is the subject of a planning application (Gloucestershire County Council reference 15/0108/FDMAJM) which is still ‘live’ but not under active consideration. In response to that application which, by definition, must apply to the Allocation 01 area, Natural England concluded that: “Natural England objects to this proposal. As submitted we consider it will damage or destroy the interest features for which Slade Brook Site of Special Scientific Interest has been notified. We have reached this view for the following reasons: • Impacts on hydrology; • Impacts on epikarst and soil; • Inability of monitoring	Allocation Area 01 (land east of Stowe Hill quarry) should be removed in its entirety from the Minerals Local Plan	It is the view of the MPA that a sufficiently detailed and proportionate policy framework has been provided to ensure that water resource matters will be effectively handled with new mineral development proposals. Specific concern regarding one or more of the plan’s allocations and possible site-focused, hydrological matters do not form part of Publication MLP Policy DM05 or its supporting text.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						to adequately protect the SSSI; • Inability of restoration to repair damage. Since our previous response, we have explored mitigation options in some depth with the developers and the Environment Agency. It is our conclusion that there is no scope for amendments to the design of the proposal that could adequately avoid or mitigate the environmental harm from this proposal in this location. Fundamentally there is a high level of risk to the SSSI with no realistic mitigation option". The MLP itself states that "Avoiding derogation of the SSSI must be the primary focus". Thus, to include this Allocation Area in the plan conflicts directly with Policy DM05 points I, II and IV. There is further conflict with Policy DM06 (development within SSSIs) point II. There is direct conflict with NPPF 118 which states that "if significant harm … cannot be avoided, adequately			

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						mitigated or … compensated for, then planning permission should be refused". The Precautionary Principle must apply			
802011/2/DM05/USND	Mr R S Crighton	Clerk Newland Parish Council	No	(2) Not justified (4) Not consistent with national policy	No	This is a supplementary response following advice received from Natural England and the Environment Agency. Policy DM05 ("Water resources") is UNSOUND in respect of Allocation 01 (Land east of Stowe Hill quarry). There is a current planning application under consideration (Gloucestershire County Council reference 17/0122/FDMAJM) for an extension in to the area proposed. In response to that application which, by definition, must apply to the Allocation 01 area, Natural England, in their response dated 29 June 2018 have emphatically objected, saying: "Natural England objects to this proposal. As submitted we consider there is a high risk it will damage or destroy the interest features for which	Allocation Area 01 (land east of Stowe Hill quarry) should be removed in its entirety from the Minerals Local Plan	It is the view of the MPA that a sufficiently detailed and proportionate policy framework has been provided to ensure that water resource matters will be effectively handled with new mineral development proposals. Specific concern regarding one or more of the plan's allocations and possible site-focused, hydrological matters do not form part of Publication MLP Policy DM05 or its supporting text.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Slade Brook Site of Special Scientific Interest has been notified. We have reached this view for the following reasons: • Impacts on hydrology; • Impacts on epikarst; • Inability of monitoring to adequately protect the SSSI; • Inability of restoration to repair damage. In response to the same application the Environment Agency have stated: “At this time we would OBJECT to the proposed development as submitted. On the basis of current key concerns there may be irreversible adverse environmental impacts in EIA terms. … there may be more sustainable locations / sites for future extraction purposes …” Since our previous response, we have explored mitigation options in some depth with the developers and the Environment Agency. It is our conclusion that there is no scope for amendments to the design of the proposal that could adequately avoid or mitigate the environmental harm			

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						from this proposal in this location. Fundamentally there is a high level of risk to the SSSI with no realistic mitigation option". The MLP itself states that "Avoiding derogation of the SSSI must be the primary focus". Thus, to include this Allocation Area in the plan conflicts directly with Policy DM05 points I, II and IV. There is further conflict with Policy DM06 (development within SSSIs) point II. There is direct conflict with NPPF 118 which states that "if significant harm … cannot be avoided, adequately mitigated or … compensated for, then planning permission should be refused". The Precautionary Principle must apply			
794755/22/DM05/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
793504/12/DM05/USND		Stanway Stone Company	No			Policy DM05 | Water resources There is no definition of watercourses and given this can include field drainage ditches IV		It is the view of the MPA that whilst a sufficiently detailed and proportionate	**Possible Modifications –** **Under Publication MLP Policy DM05, add**

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						should be deleted or clarification provided		policy framework has been provided to ensure that water resource matters will be effectively handled with new mineral development proposals, the policy (and supporting text) would justifiably benefit from further clarification concerning the criteria that must be met by future applicants	**to the beginning of clause IV *'Unless justifiable and agreeable change is achievable'*** **Also, add a definition footnote for the term watercourse – *"A watercourse is defined as any channel through which water flows. Watercourses can be natural or man made, open on the surface or enclosed. Watercourses serve to drain the land and can assist in supporting flora and fauna. They include rivers, brooks, becks, ditches, streams, leats, goyles, rhynes and culverts."*** **Under Publication MLP paragraph 337, 4th sentence, replace *"…are locate near to…"* with *"…that could affect…"* Also add two new sentences to the**

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
									end of the paragraph; *"In the event that the integrity of a watercourse may be unavoidably affected, robust and credible evidence to justify this matter must be provided. All proposals under these circumstances will be rigorous scrutinised including consultation with the Environment Agency and / or the Lead Local Flood Authority to ensure that an acceptable and deliverable scheme is brought forward that will secure wherever possible, the minimum degree of change and / or alteration necessary.*
793895/12/DM05/USND	Respondent	Cotswold Stone Quarries	No			Policy DM05 | Water resources There is no definition of watercourses and given this can include field drainage ditches IV should be deleted or clarification provided.		It is the view of the MPA that whilst a sufficiently detailed and proportionate policy framework has been	**Possible Modifications –** **Under Publication MLP Policy DM05, add to the beginning of clause IV**

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								provided to ensure that water resource matters will be effectively handled with new mineral development proposals, the policy (and supporting text) would justifiably benefit from further clarification concerning the criteria that must be met by future applicants	***'Unless justifiable and agreeable change is achievable'*** **Also, add a definition footnote for the term watercourse – *"A watercourse is defined as any channel through which water flows. Watercourses can be natural or man made, open on the surface or enclosed. Watercourses serve to drain the land and can assist in supporting flora and fauna. They include rivers, brooks, becks, ditches, streams, leats, goyles, rhynes and culverts."*** **Under Publication MLP paragraph 337, 4th sentence, replace *"…are locate near to…"* with *"…that could affect…"* Also add two new sentences to the end of the paragraph; *"In***

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
									the event that the integrity of a watercourse may be unavoidably affected, robust and credible evidence to justify this matter must be provided. All proposals under these circumstances will be rigorous scrutinised including consultation with the Environment Agency and / or the Lead Local Flood Authority to ensure that an acceptable and deliverable scheme is brought forward that will secure wherever possible, the minimum degree of change and / or alteration necessary.
802358/14/DM05/USND	Respondent	Smiths (Gloucester) Ltd	No			Policy DM05 | Water resources There is no definition of watercourses and given this can include field drainage ditches IV should be deleted or clarification provided.		It is the view of the MPA that whilst a sufficiently detailed and proportionate policy framework has been provided to ensure that water	**Possible Modifications –** **Under Publication MLP Policy DM05, add to the beginning of clause IV *'Unless justifiable and***

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								resource matters will be effectively handled with new mineral development proposals, the policy (and supporting text) would justifiably benefit from further clarification concerning the criteria that must be met by future applicants	***agreeable change is achievable'*** **Also, add a definition footnote for the term watercourse – *"A watercourse is defined as any channel through which water flows. Watercourses can be natural or man made, open on the surface or enclosed. Watercourses serve to drain the land and can assist in supporting flora and fauna. They include rivers, brooks, becks, ditches, streams, leats, goyles, rhynes and culverts."*** **Under Publication MLP paragraph 337, 4th sentence, replace *"…are locate near to…"* with *"…that could affect…"* Also add two new sentences to the end of the paragraph; *"In the event that the integrity of a***

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
									watercourse may be unavoidably affected, robust and credible evidence to justify this matter must be provided. All proposals under these circumstances will be rigorous scrutinised including consultation with the Environment Agency and / or the Lead Local Flood Authority to ensure that an acceptable and deliverable scheme is brought forward that will secure wherever possible, the minimum degree of change and / or alteration necessary.
810002/1/DM05/SND	Respondent	Welsh Water	Yes			With regard to the main body of the Plan, we have no particular concerns and welcome the inclusion of Policy DM05 Water Resources. This policy offers the assurance that water resources will not be impacted by any minerals development		The representation, which considers this matter to be 'sound' is noted.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						proposals.			
1169920/4/DM05/USND	Mark Davies	Environment Agency	No	(2) Not justified (3) Not effective (4) Not consistent with national policy		Policy DM05 Water Resources There are some errors in the supporting text and we have some suggested improvements to make the policy more effective.	The policy could be improved. In relation to water quality and WFD, part I. there will be no deterioration in water quality "and do not lead to deterioration of EU Water Framework Directive water body status"; could also include: "Measures are incorporated which enhances and protects water quality, including Gloucestershire's groundwater resources". You could add: "Help to conserve and enhance watercourses and riverside habitats. Where necessary, this should be through management and mitigation measures for the improvement and/or enhancement of water quality and habitat of any aquatic environment in or adjoining the development site". V. wherever possible, measures to achieve the efficient use of water will be Delivered, - add "including incorporating appropriate water	It is acknowledged by the MPA that elements of Publication MLP policy DM05 would benefit from further revisions. A Statement of Common Ground (SoCG) has been prepared involving the MPA and the Environment Agency to set out in detail various changes that could form part of a request for formal modifications for consideration at examination.	**Possible Modifications –** **Numerous replacements and additions to Publication MLP Policy DM05 culminating in the following text: -** ***"Mineral development proposals will be permitted where it can be demonstrated: -*** ***I. there will be no decline in water quality that would lead to a deterioration of EU Water Framework Directive (WFD) water body status and that measures to improve water quality and water body status will be incorporated wherever possible to help achieve good ecological status;*** ***II. measures will be incorporated to***

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							conservation techniques".		***enhance and protect water quality, including Gloucestershire's groundwater resources;*** ***III. the actions and objectives set out in the Severn and / or Thames River Basin Management Plan (RBMP) will be supported in striving to protect and improve the quality of water bodies;*** ***IV. the physical integrity of watercourses will be preserved and wherever possible conserved and enhanced, including riverside habitats. Where necessary, management and mitigation measures will be incorporated to improve and / or enhance water quality and habitats of aquatic environments in***

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM05 | Water resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM05 | Water resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
									or adjoining the development site; and ***V. wherever possible, measures to achieve the efficient use of water will be delivered including incorporating appropriate water conservation techniques."***

Matters related to the supporting text to Policy DM05 | Water resources

Publication MLP Consultation Questionnaire Reference | Questions 47.1, 47.2, 47.3, 47.4, 47.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM05 (paragraphs 328-339) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM05 (paragraphs 328-339) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/46/DM05/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1169920/5/DM05/USND	Mark Davies	Environment Agency	No	(2) Not justified (3) Not effective (4) Not consistent with national policy		Policy DM05 Water Resources There are some errors in the supporting text and we have some suggested improvements to make the policy more effective.	Paragraph 333. 'The Water Framework Directive (WFD) sets the overarching policy for protecting and improving the water quality…and presently sets a target to achieve at least 'Good Status' for all by 2015'. This should read "2027" not 2015. As part of this paragraph we would recommend you could add – "Further information on WFD, including specific local catchments within Gloucestershire, which supports and builds on the River Basin Management Plans, is available at: http://environment.data.gov.uk/catchment-planning/ ." Paragraph 334. 'Reflective of WFD requirements, national policy advises on the need	It is acknowledged by the MPA that elements of the supporting text for Publication MLP policy DM05 would benefit from further revisions. A Statement of Common Ground (SoCG) has been prepared involving the MPA and the Environment Agency to set out in detail various changes that could form part of a request for formal modifications for consideration at examination.	**Possible Modifications –** **Under Publication MLP paragraph 332 after *"…impact on…"* remove *"the management of…"*** **Under Publication MLP paragraph 333 replace *"…2015"* with *"…2027.".*** **Various additions and deletions with Publication MLP paragraph 335 so that it reads; "** ***"Mineral development proposals may benefit from a hydrological and hydrogeological assessment that incorporates an analysis of water quality and quantity impacts. The assessment must be carried out where it is***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM05 (paragraphs 328-339) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM05 (paragraphs 328-339) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
							to prevent mineral development proposals from having unacceptable adverse impacts on the quantity and flow of surface and ground water and the migration of contamination176' The above is a general reflection for all development. As outlined in Paragraph: 016 Reference ID: 34-016-20140306 of the NPPG, you could reference the indirect affects on water bodies, from mineral workings upon …the likely impacts of the proposed development (including physical modifications) on water quantity and flow, river continuity and groundwater connectivity, and biological elements (flora and fauna). In addition you could add that for mineral development a WFD compliance assessment may be required in the supporting text and/or policy. Paragraph 336 – we would recommend you add …		***anticipated water quality impacts pose a significant planning concern. In certain circumstances a specific WFD Compliance Assessment may also be necessary. A WFD Compliance Assessment will need to consider biological quality, physio-chemical conditions and hydro-morphological conditions of surface water bodies and quantity and chemical status of groundwater bodies. In line with planning practice guidance, the assessment of water quality should be undertaken where a proposal involves the physical modification of a water body and / or could indirectly affect a water body. Key aspects of the assessment should include the nature of potential adverse impacts upon identified water bodies and the options for***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM05 (paragraphs 328-339) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM05 (paragraphs 328-339) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
							"improvement to, where possible", or deterioration in the quality of water bodies from their current status'.		***reducing impacts to acceptable levels including an analysis of the delivery of effective and deliverable mitigation measures. The overarching objective must be to demonstrate at least, how the current WFD status of identified water bodies will not suffer any deterioration."*** **Various additions and deletions with Publication MLP paragraph 336 so that it reads;** ***"336. The assessment of water quality and quantity impacts will need to pay particular attention to the Severn River and / or Thames River Basin Management Plans. These plans implement the WFD at the sub-national level by way of a catchment-based approach to water management, which will ensure a holistic view is taken over***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM05 (paragraphs 328-339) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM05 (paragraphs 328-339) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
									hydrological influences affecting a larger-than-local area. A catchment-based approach to water management is encouraged through planning practice guidance. The Severn River and Thames River Basin Management Plans identify key technical information concerning the hydrological characteristics of Gloucestershire and surrounding areas and set out actions to be taken to ensure improvements where possible, or to secure no deterioration in the quality of water bodies from their current status. The plans also consider the means of delivering improved water quality status. Consequently, Mineral development proposals should incorporate measures wherever possible, that will contribute to the ambitions outlined

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM05 (paragraphs 328-339) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM05 (paragraphs 328-339) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
									within the relevant River Basin Management Plan."
1038720/46/DM05/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Matters related to Policy DM06 | Biodiversity and geodiversity

Publication MLP Consultation Questionnaire Reference | Questions 48.1, 48.2, 48.3, 48.4, 48.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM06 | Biodiversity and geodiversity is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM06 | Biodiversity and geodiversity is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
852145/18/DM06/USND	Mr Nigel Gibbons	Forest of Dean District Council	No	(1) Not positively prepared (3) Not effective		The policy is worded in a manner that is unclear. The intention is plainly that development should conserve or where possible provide net biodiversity gains. Again the use of the phrase “will normally be permitted” is not clear. Its intention is presumably that development which is permitted should provide net gains or demonstrate conservation (rather than that development will be permitted because it provides such gains or conservation). Given the need for the remainder of the policy to run through the hierarchy, it is considered appropriate to re word the first part as suggested.	How does the plan need changing: The first part of DM06 should be amended to read … “Mineral development proposals should demonstrate the conservation of biodiversity…” The start of the final section in respect of development that includes Local Nature Reserves, key wildlife sites and RIGS sites should be amended to read “will only be permitted where it can be demonstrated…”	It is the view of the MPA that Publication MLP policy DM06 accords with national policy and guidance. The specific wording has been prepared with the direct support and advice of the Natural England All of the proposed changes outlined in the representation, are considered unjustified. In the specific case of the use of the word *‘normally* this has been used to acknowledge that proposals that positively conserve or benefit biodiversity / geodiversity are not always permitted. Other impacts such as adversely affecting highways or landscapes may carry more weight. Furthermore, the addition of the word ‘only’ before “…be permitted” towards the end of the policy is not essential to add clarity.	No modifications are considered necessary in response to the representation.
794755/23/DM06/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team	Yes					The representation, which considers this matter to be ‘sound’, is	No modifications are considered necessary in

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM06 | Biodiversity and geodiversity is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM06 | Biodiversity and geodiversity is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
		South Gloucestershire Council						noted.	response to the representation.
1164737/47/DM06/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
820738/13/DM06/USND	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd	No			Policy DM06 | Biodiversity and geodiversity The final paragraph on DM06 is not required if a species has legal protection.		It is the view of the MPA that Publication MLP policy DM06 accords with national policy and guidance. The specific wording has been prepared with the direct support and advice of the Natural England. In respect of the approach towards legally protected species, this is a potentially pivotal material planning matter that warrants a local policy stance. Legal protection affords the requirement, in certain circumstances of the need to obtain Wildlife licences. It is the likelihood that a licence will be granted that should be factored into the decision on whether a proposal should be granted planning permission or not. The approach set out in Publication MLP DM06 clearly establishes this	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM06 | Biodiversity and geodiversity is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM06 | Biodiversity and geodiversity is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								as a key local policy test with specific attention given to the provision of suitable safeguarding measures. It is also worth noting that in the presence of European Protected Species, the MPA is required to consider 3 tests under the Habitats Regulations 2017 to determine whether a licensed derogation is possible as a consequence of permitting a development. Legally protected species are also often priority species appearing on the English List (S41 of the NERC Act) which is the basis of the MPAs biodiversity duty (S40 of the NERC Act). Legally protected species must be considered as part of biodiversity assessment overall so that it can be determined if conservation or net gain for biodiversity can be achieved.	
794030/13/DM06/USND	Respondent	Syreford Quarries & Masonry Ltd	No			Policy DM06 | Biodiversity and geodiversity The final paragraph on DM06 is not required if a species has legal protection.		It is the view of the MPA that Publication MLP policy DM06 accords with national policy and guidance. The specific wording has been prepared with the direct	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM06 | Biodiversity and geodiversity is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM06 | Biodiversity and geodiversity is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								support and advice of the Natural England. In respect of the approach towards legally protected species, this is a potentially pivotal material planning matter that warrants a local policy stance. Legal protection affords the requirement, in certain circumstances of the need to obtain Wildlife licences. It is the likelihood that a licence will be granted that should be factored into the decision on whether a proposal should be granted planning permission or not. The approach set out in Publication MLP DM06 clearly establishes this as a key local policy test with specific attention given to the provision of suitable safeguarding measures. It is also worth noting that in the presence of European Protected Species, the MPA is required to consider 3 tests under the Habitats Regulations 2017 to determine whether a licensed derogation is possible as a consequence of permitting a development. Legally	

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM06 | Biodiversity and geodiversity is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM06 | Biodiversity and geodiversity is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								protected species are also often priority species appearing on the English List (S41 of the NERC Act) which is the basis of the MPAs biodiversity duty (S40 of the NERC Act). Legally protected species must be considered as part of biodiversity assessment overall so that it can be determined if conservation or net gain for biodiversity can be achieved.	
1028219/18/DM06/USND	Ms Nicola Packer		No	(3) Not effective		Mitigation is often unsuccessful or of very limited use. You cannot 'compensate' for damage to unique habitats. Quarrying should not be permitted where there is a risk of damage to SSSI sites. Natural England no longer have the resources to check HRAs. It is not possible to demonstrate that there would be no damage to ecology of sensitive sites.	Omit 'or satisfactorily mitigated'. Omit 'In exceptional circumstances, where an impact cannot be avoided or mitigated, then compensatory measures including the use of biodiversity and / or geodiversity offsets will be considered as a means to provide an overall net gain. Quarrying should not be permitted where there is a possibility of damage to SSSI sites or other important designated sites.	It is the view of the MPA that Publication MLP policy DM06 accords with national policy and guidance. The specific wording has been prepared with the direct support and advice of the Natural England. The revisions put forward in the representation would not be compliant with national policy, which sets out the well-established mitigation hierarchy.	No modifications are considered necessary in response to the representation.
808023/18/DM06/USND	Mr	Group Director -	No			Policy DM06 – how		It is the view of the MPA	No modifications are

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM06 | Biodiversity and geodiversity is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM06 | Biodiversity and geodiversity is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
	Peter Andrew	Quarry Products HIlls Quarry Products Ltd				can mineral development conserve biodiversity or geodiversity, when by definition it will remove the surface and minerals? It can conserve surrounding, but not the development itself. Patr B of this Policy regarding SSSI needs to be reworded in light of NE proposal for designating all of the Water Park a SSSI, otherwise the Policy will be at odds with NE's intention of supporting mineral working		that Publication MLP policy DM06 accords with national policy and guidance. The specific wording has been prepared with the direct support and advice of the Natural England.	considered necessary in response to the representation.
1038720/47/DM06/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
802358/15/DM06/USND	Respondent	Smiths (Gloucester) Ltd	No			Policy DM06 | Biodiversity and geodiversity The final paragraph on DM06 is not required if a species has legal protection.		It is the view of the MPA that Publication MLP policy DM06 accords with national policy and guidance. The specific wording has been prepared with the direct support and advice of the Natural England. In respect of the approach	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM06 | Biodiversity and geodiversity is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM06 | Biodiversity and geodiversity is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								towards legally protected species, this is a potentially pivotal material planning matter that warrants a local policy stance. Legal protection affords the requirement, in certain circumstances of the need to obtain Wildlife licences. It is the likelihood that a licence will be granted that should be factored into the decision on whether a proposal should be granted planning permission or not. The approach set out in Publication MLP DM06 clearly establishes this as a key local policy test with specific attention given to the provision of suitable safeguarding measures. It is also worth noting that in the presence of European Protected Species, the MPA is required to consider 3 tests under the Habitats Regulations 2017 to determine whether a licensed derogation is possible as a consequence of permitting a development. Legally protected species are also often priority species appearing on the	

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM06 | Biodiversity and geodiversity is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM06 | Biodiversity and geodiversity is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								English List (S41 of the NERC Act) which is the basis of the MPAs biodiversity duty (S40 of the NERC Act). Legally protected species must be considered as part of biodiversity assessment overall so that it can be determined if conservation or net gain for biodiversity can be achieved.	
793504/13/DM06/USND		Stanway Stone Company	No			Policy DM06 | Biodiversity and geodiversity The final paragraph on DM06 is not required if a species has legal protection		It is the view of the MPA that Publication MLP policy DM06 accords with national policy and guidance. The specific wording has been prepared with the direct support and advice of the Natural England. In respect of the approach towards legally protected species, this is a potentially pivotal material planning matter that warrants a local policy stance. Legal protection affords the requirement, in certain circumstances of the need to obtain Wildlife licences. It is the likelihood that a licence will be granted that should be factored into the decision on whether a proposal should be granted planning	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM06 | Biodiversity and geodiversity is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM06 | Biodiversity and geodiversity is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								permission or not. The approach set out in Publication MLP DM06 clearly establishes this as a key local policy test with specific attention given to the provision of suitable safeguarding measures. It is also worth noting that in the presence of European Protected Species, the MPA is required to consider 3 tests under the Habitats Regulations 2017 to determine whether a licensed derogation is possible as a consequence of permitting a development. Legally protected species are also often priority species appearing on the English List (S41 of the NERC Act) which is the basis of the MPAs biodiversity duty (S40 of the NERC Act). Legally protected species must be considered as part of biodiversity assessment overall so that it can be determined if conservation or net gain for biodiversity can be achieved.	
793895/13/DM06/USND	Respondent	Cotswold Stone Quarries	No			Policy DM06 | Biodiversity and geodiversity		It is the view of the MPA that Publication MLP policy DM06 accords	No modifications are considered necessary in

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM06 | Biodiversity and geodiversity is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM06 | Biodiversity and geodiversity is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						The final paragraph on DM06 is not required if a species has legal protection.		with national policy and guidance. The specific wording has been prepared with the direct support and advice of the Natural England. In respect of the approach towards legally protected species, this is a potentially pivotal material planning matter that warrants a local policy stance. Legal protection affords the requirement, in certain circumstances of the need to obtain Wildlife licences. It is the likelihood that a licence will be granted that should be factored into the decision on whether a proposal should be granted planning permission or not. The approach set out in Publication MLP DM06 clearly establishes this as a key local policy test with specific attention given to the provision of suitable safeguarding measures. It is also worth noting that in the presence of European Protected Species, the MPA is required to consider 3 tests under the Habitats Regulations 2017 to determine whether a licensed	response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM06 | Biodiversity and geodiversity is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM06 | Biodiversity and geodiversity is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								derogation is possible as a consequence of permitting a development. Legally protected species are also often priority species appearing on the English List (S41 of the NERC Act) which is the basis of the MPAs biodiversity duty (S40 of the NERC Act). Legally protected species must be considered as part of biodiversity assessment overall so that it can be determined if conservation or net gain for biodiversity can be achieved.	

Matters related to the supporting text to Policy DM06 | Biodiversity and geodiversity

Publication MLP Consultation Questionnaire Reference | Questions 49.1, 49.2, 49.3, 49.4, 49.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM06 (paragraphs 340-355) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM06 (paragraphs 340-355) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/48/DM06/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1038720/48/DM06/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Matters related to Policy DM07 | Soil resources

Publication MLP Consultation Questionnaire Reference | Questions 50.1, 50.2, 50.3, 50.4, 50.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM07 | Soil resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM07 | Soil resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
924705/10/DM07/USND	Respondent	Head of Estates & Planning Breedon Aggregates	No			Policy DM07 conflicts with Policy DM06 as there are times when there is BMVAL that restoration schemes cannot not replace at the same time as enhancing biodiversity. Policy DM07- Soil resources also requires that 'Mineral development proposals will be permitted where they have been informed by and are sympathetic to the protection of soil resources by demonstrating: II. opportunities for soil quality enhancement will be facilitated'. It is not clear what this means. Does this mean that all soil must be improved by the enrichment of compost or that all the replaced poor quality soils should be improved to become BMVAL?		It is the view of the MPA that the policy framework for managing soil resources is proportionate and justifiable, and wholly in accordance with national policy and guidance in respect of this matter. The concern relating to policy conflicts is strongly contested. There is sufficient provision for dealing with the potentially conflicting circumstances exemplified. The inclusion of clause IV clearly offers the opportunity for a case to be made that other benefits will outweigh the desire to protect and / or enhance existing soil resources. Nevertheless, the MPA does acknowledge that the policy wording would benefit from a revision to improve clarity.	**Possible Modification –** **Revise Publication MLP Policy DM07 clause ii so that it reads: - *"wherever possible, measures to achieve improvements in soil quality will be delivered."* Also, revise clause IV after *"…of soil…"* by adding *"…and / or opportunities to achieve soil quality improvements…"***
808023/19/DM07/COM	Mr Peter	Group Director - Quarry Products				Policy DM07 – where there is		It is the view of the MPA that the policy	No modifications are considered

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM07 | Soil resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM07 | Soil resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
	Andrew	HIlls Quarry Products Ltd				BMVAL and restoration is to enhanced biodiversity by provision of a wetland for example, because other constraints prevent restoration to agricultural land this should be given weight, rather than an automatic presumption that BMVAL has to go back to the same.		framework for managing soil resources is proportionate and justifiable, and wholly in accordance with national policy and guidance in respect of this matter. In respect of the concern raised over possible conflicts between certain restoration options and soil resource protection, this is not deemed to be unresolvable within the current policy wording. The inclusion of clause IV clearly offers the opportunity for a case to be made that other benefits will outweigh the desire to protect and / or enhance existing soil resources.	necessary in response to the representation.
1038720/49/DM07/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be ‘sound’ and ‘legally compliant’, is noted.	No modifications are considered necessary in response to the representation.
852145/19/DM07/USND	Mr Nigel Gibbons	Forest of Dean District Council	No	(1) Not positively prepared (3) Not effective		As with several other DM policies the intent of DM07 is plain but it is suggested that the wording could be improved. The implied sense of the	Add to the policy the word “only”… Mineral development will only be permitted or re word … Mineral development proposals must be informed by and be	It is the view of the MPA that the policy framework for managing soil resources is proportionate and justifiable, and wholly in accordance	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM07 | Soil resources is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM07 | Soil resources is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						policy that mineral development will need to be informed by and be sympathetic to the protection of soil resources is there but the policy could make it clear that this is an additional requirement to the compliance with other policies.	sympathetic to…	with national policy and guidance in respect of this matter.	
1164737/49/DM07/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be ‘sound’ and ‘legally compliant’, is noted.	No modifications are considered necessary in response to the representation.
794755/24/DM07/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be ‘sound’, is noted.	No modifications are considered necessary in response to the representation.

Matters related to the supporting text to Policy DM07 | Soil resources

Publication MLP Consultation Questionnaire Reference | Questions 51.1, 51.2, 51.3, 51.4, 51.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM07 (paragraphs 356-365) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM07 (paragraphs 356-365) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/50/DM07/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1038720/50/DM07/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Matters related to Policy DM08 | Historic environment

Publication MLP Consultation Questionnaire Reference | Question 52.1, 52.2, 52.3, 52.4, 52.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM08 | Historic environment is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM08 | Historic environment is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
924705/11/DM08/USND	Respondent	Head of Estates & Planning Breedon Aggregates	No			Policy DM08- Historic environment requires 'Mineral development proposals will be permitted where they conserve, and where appropriate, enhance the significance of any affected heritage asset'. The nature of mineral development is such that buried archaeology is destroyed and cannot be conserved. Furthermore, if there is not a heritage asset associated with a mineral development how can a heritage asset be enhanced?		It is the view of the MPA that the wording of Publication MLP policy DM08 is compliant with the NPPF. It makes reasonable provision for those circumstances, where heritage assets of the highest significance may be present and therefore could be affected by minerals development. Also, there is no requirement to achieve the enhancement of non-existent heritage assets.	No modifications are considered necessary in response to the representation.
808023/20/DM08/USND	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd	No			DM08 – as with DM06 How can mineral development conserve buried archaeology in the site ? Can a non designated asset be of the same importance as a designated asset, be common sense not, so why is it given the same degree of		It is the view of the MPA that the wording of Publication MLP policy DM08 is compliant with the NPPF. It makes reasonable provision for those circumstances, where heritage assets of the highest significance may be	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM08 | Historic environment is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM08 | Historic environment is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						consideration ?		present and therefore could be affected by minerals development. This could include restrictions that prevent or limit mineral extraction taking place. The policy also justifiably acknowledges that not all heritage assets, which are present – particularly those of archaeological interest, are fully understood to such an extent that they are either designated or designated to an appropriate level prior to the consideration of minerals development proposals. The policy ensures that the significance of all heritage assets will be appropriately considered.	
1038720/51/DM08/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
802358/16/DM08/USND	Respondent	Smiths (Gloucester) Ltd	No			Policy DM08 | Historic environment DM08 refers to scheduled monuments and		It is the view of the MPA that Publication MLP policy DM08 and the supporting text does not present	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM08 | Historic environment is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM08 | Historic environment is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						other non-designated archaeological assets of equivalent importance, however that qualification is lost in the text, notably para 376 which only refers to heritage assets and states 'the preservation in situ of archaeological assets will normally be the preferred solution' which goes beyond the policy wording and this should be removed or appropriately qualified in line with the policy. The text should to refer Historic England's Mineral Extraction and Archaeology: A Practice Guide, first sentence of para 372		a conflict in the approach taken to responding to heritage assets with minerals development. Particularly in respect of the preservation in situ of heritage assets. It is very clear that balanced judgements will need to be taken on a case-by-case basis based on the significance of the heritage assets affected, weighted against the benefits of the development. Furthermore, it is not deemed appropriate to signpost out-of-date guide. The HE practice guide referred to is over ten years old and pre-dates Planning Policy Statement (PPS) 5; NPPF (2012) and the Revised NPPF (2018). A revised draft version is under consideration but not yet ready for publication to help inform plan preparation.	
793504/14/DM08/USND		Stanway Stone Company	No			Policy DM08 | Historic environment		It is the view of the MPA that Publication	No modifications are considered

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM08 | Historic environment is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM08 | Historic environment is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						DM08 refers to scheduled monuments and other non-designated archaeological assets of equivalent importance, however that qualification is lost in the text, notably para 376 which only refers to heritage assets and states 'the preservation in situ of archaeological assets will normally be the preferred solution' which goes beyond the policy wording and this should be removed or appropriately qualified in line with the policy.		MLP policy DM08 and the supporting text does not present a conflict in the approach taken to responding to heritage assets with minerals development. Particularly in respect of the preservation in situ of heritage assets. It is very clear that balanced judgements will need to be taken on a case-by-case basis based on the significance of the heritage assets affected, weighted against the benefits of the development.	necessary in response to the representation.
793895/14/DM08/USND	Respondent	Cotswold Stone Quarries	No			Policy DM08 | Historic environment DM08 refers to scheduled monuments and other non-designated archaeological assets of equivalent importance, however that qualification is lost in the text, notably para 376 which only refers to heritage assets and states 'the preservation in situ		It is the view of the MPA that Publication MLP policy DM08 and the supporting text does not present a conflict in the approach taken to responding to heritage assets with minerals development. Particularly in respect of the preservation in situ of heritage assets. It is very clear that balanced	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM08 | Historic environment is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM08 | Historic environment is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						of archaeological assets will normally be the preferred solution' which goes beyond the policy wording and this should be removed or appropriately qualified in line with the policy.		judgements will need to be taken on a case-by-case basis based on the significance of the heritage assets affected, weighted against the benefits of the development.	
852145/20/DM08/USND	Mr Nigel Gibbons	Forest of Dean District Council	No	(1) Not positively prepared (3) Not effective (4) Not consistent with national policy		The intent of the policy is understood but the wording could be improved by changes suggested below. This would better align it with national policy in respect of heritage assets (NPPF). This policy sets out important requirements and the test that where affected heritage assets should be conserved or enhanced	Change policy to… "Mineral development proposals must conserve and where appropriate enhance the significance of any affected heritage asset…."	It is the view of the MPA that Publication MLP policy DM08 is fully complaint with the NPPF and has been drafted with the support of Historic England. It does not require modifications at this stage.	No modifications are considered necessary in response to the representation.
1164737/51/DM08/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
820738/14/DM08/USND	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd	No			Policy DM08 | Historic environment DM08 refers to scheduled monuments and other non-designated		It is the view of the MPA that Publication MLP policy DM08 and the supporting text does not present a conflict in the approach taken to	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM08 | Historic environment is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM08 | Historic environment is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						archaeological assets of equivalent importance, however that qualification is lost in the text, notably para 376 which only refers to heritage assets and states 'the preservation in situ of archaeological assets will normally be the preferred solution' which goes beyond the policy wording and this should be removed or appropriately qualified in line with the policy.		responding to heritage assets with minerals development. Particularly in respect of the preservation in situ of heritage assets. It is very clear that balanced judgements will need to be taken on a case-by-case basis based on the significance of the heritage assets affected, weighted against the benefits of the development.	
794030/14/DM08/USND	Respondent	Syreford Quarries & Masonry Ltd	No			Policy DM08 | Historic environment DM08 refers to scheduled monuments and other non-designated archaeological assets of equivalent importance, however that qualification is lost in the text, notably para 376 which only refers to heritage assets and states 'the preservation in situ of archaeological assets will normally be the preferred solution' which goes beyond the policy		It is the view of the MPA that Publication MLP policy DM08 and the supporting text does not present a conflict in the approach taken to responding to heritage assets with minerals development. Particularly in respect of the preservation in situ of heritage assets. It is very clear that balanced judgements will need to be taken on a case-by-case basis based on the significance of the	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM08 | Historic environment is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM08 | Historic environment is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						wording and this should be removed or appropriately qualified in line with the policy.		heritage assets affected, weighted against the benefits of the development.	

Matters related to the supporting text to Policy DM08 | Historic environment

Publication MLP Consultation Questionnaire Reference | Questions 53.1, 53.2, 53.3, 53.4, 53.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM08 (paragraphs 366-378) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM08 (paragraphs 366-378) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
852145/21/DM08/COM	Mr Nigel Gibbons	Forest of Dean District Council				The text will need amendment to outline the approach of the revised policy.		It is the view of MPA that no modifications to the supporting text to Publication MLP policy DM08 are required as no policy modifications are being proposed.	No modifications are considered necessary in response to the representation.
1164737/52/DM08/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
793641/2/DM08/COM	Mr Rohan Torkildsen	South West Region Historic England				Paragraph 372 states that it may be reasonable to take a staged approach to understanding Historic Environment on a site. Historic England would say it is entirely reasonable to take a staged approach. Also paragraph 376 contradicts this view by stating an application must be accompanied by a detailed assessment of Heritage, which would require a staged approach. The end of the first sentence in paragraph 374 could benefit from revision to aid clarity.	Minor adjustment required Revisit to clarify	It is the view of the MPA that the text within Publication MLP paragraph 376, which refers to 'suitably detailed' assessments, does not contradict Publication MLP paragraph 372. It allows for both a reasonable initial assessment and for further information to be asked for in stages, where required to adequately understand any impact on significance. However, it is accepted that a modification to Publication MLP	**Possible Modifications –** **Revise the wording of Publication MLP paragraph 372 by replacing *'it may be reasonable…'* with *'it is reasonable…'* in the 1st sentence.** **Revise the wording of Publication MLP paragraph 374 by inserting into the 1st sentence the words *'outweigh the...'* directly before *'substantial degree of harm caused…'***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM08 (paragraphs 366-378) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM08 (paragraphs 366-378) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								paragraph 374 would help to avoid creating any potential confusion. A further modification to Publication MLP paragraph 372 may also assist with clarity.	
820738/15/DM08/USND	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd	No			The text should to refer Historic England's Mineral Extraction and Archaeology: A Practice Guide, first sentence of para 372. The wording in para 374 needs to be addressed to make sense and the meaning of the final sentence is unclear.		It is the view of the MPA that it is not appropriate to signpost out-of-date guide. The HE practice guide referred to is over ten years old and pre-dates Planning Policy Statement (PPS) 5; NPPF (2012) and the Revised NPPF (2018). A revised draft version is under consideration but not yet ready for publication to help inform plan preparation. However, it is accepted that a modification to Publication MLP paragraph 374 would help to avoid creating any potential confusion.	**Possible modification –** **Revise the wording of Publication MLP paragraph 374 by inserting into the 1st sentence the words *'outweigh the...'* directly before *'substantial degree of harm caused…'***
794030/15/DM08/USND	Respondent	Syreford Quarries & Masonry Ltd	No			The text should to refer Historic England's Mineral Extraction and Archaeology: A Practice Guide, first sentence of para 372.		It is the view of the MPA that it is not appropriate to signpost out-of-date guide. The HE practice guide referred to is over ten	**Possible modification –** **Revise the wording of Publication MLP paragraph 374 by**

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM08 (paragraphs 366-378) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM08 (paragraphs 366-378) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						The wording in para 374 needs to be addressed to make sense and the meaning of the final sentence is unclear.		years old and pre-dates Planning Policy Statement (PPS) 5; NPPF (2012) and the Revised NPPF (2018). A revised draft version is under consideration but not yet ready for publication to help inform plan preparation. However, it is accepted that a modification to Publication MLP paragraph 374 would help to avoid creating any potential confusion.	**inserting into the 1st sentence the words *'outweigh the...'* directly before *'substantial degree of harm caused…'***
808023/21/DM08/USND	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd	No			Para 371 references the need for balanced judgements, this should be noted in the Policy.		It is the view of the MPA that both Publication MLP policy DM08 and the supporting text are fully complaint with the NPPF and have been drafted with the support of Historic England. They do not require modifications at this stage.	No modifications are considered necessary in response to the representation.
794755/25/DM08/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound' compliant', is noted.	No modifications are considered necessary in response to the representation.
1038720/52/DM08/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally	No modifications are considered necessary in response to the

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM08 (paragraphs 366-378) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM08 (paragraphs 366-378) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								compliant', is noted.	representation.
802358/17/DM08/USND	Respondent	Smiths (Gloucester) Ltd	No			The wording in para 374 needs to be addressed to make sense and the meaning of the final sentence is unclear.		It is accepted that a modification to Publication MLP paragraph 374 would help to avoid creating any potential confusion.	**Possible modification –** **Revise the wording of Publication MLP paragraph 374 by inserting into the 1st sentence the words *'outweigh the...'* directly before *'substantial degree of harm caused…'***
793504/15/DM08/USND		Stanway Stone Company	No			The text should to refer Historic England's Mineral Extraction and Archaeology: A Practice Guide, first sentence of para 372. The wording in para 374 needs to be addressed to make sense and the meaning of the final sentence is unclear.		It is the view of the MPA that it is not appropriate to signpost out-of-date guide. The HE practice guide referred to is over ten years old and pre-dates Planning Policy Statement (PPS) 5; NPPF (2012) and the Revised NPPF (2018). A revised draft version is under consideration but not yet ready for publication to help inform plan preparation. However, it is accepted that a modification to Publication MLP paragraph 374 would help to avoid creating any potential confusion.	**Possible modification –** **Revise the wording of Publication MLP paragraph 374 by inserting into the 1st sentence the words *'outweigh the...'* directly before *'substantial degree of harm caused…'***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM08 (paragraphs 366-378) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM08 (paragraphs 366-378) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
793895/15/DM08/USND	Respondent	Cotswold Stone Quarries	No			The text should to refer Historic England's Mineral Extraction and Archaeology: A Practice Guide, first sentence of para 372. The wording in para 374 needs to be addressed to make sense and the meaning of the final sentence is unclear.		It is the view of the MPA that it is not appropriate to signpost out-of-date guide. The HE practice guide referred to is over ten years old and pre-dates Planning Policy Statement (PPS) 5; NPPF (2012) and the Revised NPPF (2018). A revised draft version is under consideration but not yet ready for publication to help inform plan preparation. However, it is accepted that a modification to Publication MLP paragraph 374 would help to avoid creating any potential confusion.	**Possible modification –** **Revise the wording of Publication MLP paragraph 374 by inserting into the 1st sentence the words *'outweigh the...'* directly before *'substantial degree of harm caused…'***

Matters related to Policy DM09 | Landscape

Publication MLP Consultation Questionnaire Reference | Questions 54.1, 54.2, 54.3, 54.4, 54.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM09 | Landscape is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM09 | Landscape is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
924705/12/DM09/USND	Respondent	Head of Estates & Planning Breedon Aggregates	No			Policy DM09 Landscape requires that 'Mineral development proposals will be permitted where it can be demonstrated they have been informed by, are sympathetic to, and wherever practicable, will support the enhancement of the character, features and qualities of the landscape character areas or types of the relevant NCAs and LCAs that form the Gloucestershire Landscape Character Assessment' . By its nature, it is not always possible for mineral development to be sympathetic to the character of the landscape until the site is restored. Screen bunds are, for example, alien features which do not form part of many areas' landscape characters.		It is the view of the MPA that the policy framework covering landscape matters is reflective of local circumstances and is proportionate to the scale and significance of the issues that may arise. The policy is wholly in accordance with national policy and guidance. It has also been drafted with the support of Natural England.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM09 | Landscape is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM09 | Landscape is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Policy DM09. Part B "other areas that form part of the setting of an AONB" this is too woolly and open to interpretation. Furthermore it is not always possible for the landscape impact to be mitigated. This in effect removes the ability to weigh, in the planning balance, negative micro impacts that cannot be mitigated against the positive macro benefits a development might provide to the wider community.			
808023/22/DM09/USND	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd	No			DM09 – Part B " other areas that form part of the setting of an ANOB" this is vague and open to too much interpretation. Final para – affect the setting to what degree – a minor temporary and reversible impact could be acceptable		It is the view of the MPA that the policy framework covering landscape matters is reflective of local circumstances and is proportionate to the scale and significance of the issues that may arise. The policy is wholly in accordance with national policy and guidance. It has also been drafted with the support of Natural England.	No modifications are considered necessary in response to the representation.
1038720/53/DM09/SND	Mr Richard	Chief Executive Farmcare Trading	Yes		Yes			The representation, which considers this	No modifications are considered

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM09 | Landscape is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM09 | Landscape is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
	Quinn	Ltd						matter to be ‘sound’ and ‘legally compliant’, is noted.	necessary in response to the representation.
1033898/3/DM09/USND	Mrs Mary Condrad		No	(2) Not justified (4) Not consistent with national policy	No	Policy DM09 ("Landscape") is unsound in respect of allocation 01 (Land east of Stowe Hill quarry). This area corresponds exactly with the area which is the subject of a planning application (GCC reference 15/0108/FDMAJM) which is still "live" but not under active consideration. In response to that application which, by definition must apply to the allocation 01, the Forest of Dean District Council concluded that: "it is judged that the proposal would result in significant short and long-term harm to the character and appearance of the landscape. Further more, the proposal does not provide sufficient assessment with regards to the potential impact on local designated and non-designated heritage assets. For	Allocation area 01 (Land east of Stowe Hill quarry) should be removed in its entirety from the minerals local plan.	It is the view of the MPA that the policy framework covering landscape matters is reflective of local circumstances and is proportionate to the scale and significance of the issues that may arise. The policy is wholly in accordance with national policy and guidance. It has also been drafted with the support of Natural England. The concern regarding one of the plan’s allocations is noted, however, it is not particularly relevant to the drafting of an overarching countywide development management policy.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM09 | Landscape is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM09 | Landscape is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						these reasons, it is judged that the proposal would be contrary to the NPFF (Sections 11, paras. 109, 110, 115, 116 and 118 and Section 12), National Planning Policy Guidance (section Natural Environment), the Gloucestershire Minerals Local Plan (Policies A4 and E2), Section 66 of the 1990 PLanning, Listed Buildings and Conservation Areas Act and Policy CSP.1 of the Core Strategy". Thus, to include this Allocation Area in the plan conflicts directly with Policy DM09, in relation to development affecting an AONB. It must be remembered that the Wye Valley AONB is only osme 700m from the boundary of the Allocation Area and thus development in this area will affect the setting of the AONB. As the District Council have pointed out, the inclusion of			

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM09 | Landscape is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM09 | Landscape is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						the area is contrary to NPPF 109, 110, 115, 116, 118 AND Section 12)			
802366/3/DM09/USND	Mr Dave Kent	West Dean Parish Council	No	(2) Not justified (4) Not consistent with national policy	No	Policy DM09 ("Landscape") is UNSOUND in respect of Allocation 01 (Land east of Stowe Hill quarry). This area corresponds exactly with the area which is the subject of a planning application (Gloucestershire County Council reference 15/0108/FDMAJM) which is still 'live' but not under active consideration. In response to that application which, by definition, must apply to the Allocation 01, the Forest of Dean District Council concluded that: "It is judged that the proposal would result in significant short and long-term harm to the character and appearance of the landscape. Furthermore, the proposal does not provide sufficient assessment with regards to the potential impact on	Allocation Area 01 (land east of Stowe Hill quarry) should be removed in its entirety from the Minerals Local Plan	It is the view of the MPA that the policy framework covering landscape matters is reflective of local circumstances and is proportionate to the scale and significance of the issues that may arise. The policy is wholly in accordance with national policy and guidance. It has also been drafted with the support of Natural England. The concern regarding one of the plan's allocations is noted, however, it is not particularly relevant to the drafting of an overarching countywide development management policy.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM09 | Landscape is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM09 | Landscape is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						local designated and non-designated heritage assets. For these reasons, it is judged that the proposal would be contrary to the NPPF (Sections 11, paras. 109, 110, 115, 116 and 118 and Section 12), National Planning Policy Guidance (section Natural Environment), the Gloucestershire Minerals Local Plan (Policies A4 and E2), Section 66 of the 1990 Planning, Listed Buildings and Conservation Areas Act and Policy CSP.1 of the Core Strategy". Thus, to include this Allocation Area in the plan conflicts directly with Policy DM09, in relation to development affecting an AONB. It must be remembered that the Wye Valley AONB is only some 700m from the boundary of the Allocation Area and thus development in this area will affect the setting of the AONB.			

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM09 | Landscape is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM09 | Landscape is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						As the District Council have pointed out, the inclusion of the area is contrary to NPPF 109, 110, 115, 116, 118 AND Section 12)			
1042027/3/DM09/USND	Mr Christopher Wilderspin		No	(2) Not justified (4) Not consistent with national policy	No	Policy DM09 ("Landscape") is UNSOUND in respect of Allocation 01 (Land east of Stowe Hill quarry). This area corresponds exactly with the area which is the subject of a planning application (Gloucestershire County Council reference 15/0108/FDMAJM) which is still "live" but not under active consideration. In response to that application which, by definition, must apply to the Allocation 01, the Forest of Dean District Council concluded that: "it is judged that the proposal would result in significant short and long-term harm to the character and appearance of the landscape. Furthermore, the proposal does not provide sufficient	Allocation Area 01 (land east of Stowe Hill quarry) should be removed in its entirety from the Minerals Local Plan.	It is the view of the MPA that the policy framework covering landscape matters is reflective of local circumstances and is proportionate to the scale and significance of the issues that may arise. The policy is wholly in accordance with national policy and guidance. It has also been drafted with the support of Natural England. The concern regarding one of the plan's allocations is noted, however, it is not particularly relevant to the drafting of an overarching countywide development management policy.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM09 | Landscape is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM09 | Landscape is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						assessment with regards to the potential impact on local designated and non-designated heritage assets. For these reasons, it is judged that the proposal would be contrary to the NPPF (Sections 11, paras 109,110, 115, 116 and 118 and Section 12), National Planning Policy Guidance (section Natural Environment), the Gloucestershire Minerals Local Plan (Policies A4 and E2), Section 66 of the 1990 Planning, Listed Buildings and Conservation Areas Act and Policy CSP.1 of the Core Strategy". Thus, to include this Allocation Area in the plan conflicts directly with Policy DM09, in relation to development affecting an AONB. It must be remembered that the Wye Valley AONB is only some 700m from the boundary of the Allocation Area and thus			

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						development in this area will affect the setting of the AONB. As the District Council have pointed out, the inclusion of the area is contrary to NPPF 109, 110, 115, 116, 118 AND Section 12)			
852145/22/DM09/USND	Mr Nigel Gibbons	Forest of Dean District Council	No	(1) Not positively prepared (3) Not effective		The policy wording is unclear, as the intent is that developments should demonstrate that they are sympathetic to and support the landscape and features within it. Clearly it is not the case that development that does this will be permitted, rather that development should comply with the policy.	Amend the wording to read …Mineral development proposals will only be permitted where it can be demonstrated…"	It is the view of the MPA that the policy framework covering landscape matters is reflective of local circumstances and is proportionate to the scale and significance of the issues that may arise. The policy is wholly in accordance with national policy and guidance. It has also been drafted with the support of Natural England.	No modifications are considered necessary in response to the representation.
1164737/53/DM09/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
847014/1/DM09/USND	Mr Jonathan Wright	Clearwell Caves	No	(2) Not justified (4) Not consistent with national policy	No	Policy DM09 ("Landscape") is UNSOUND in respect of Allocation 01 (Land east of Stowe Hill quarry). This area corresponds exactly	Allocation Area 01 (land east of Stowe Hill quarry) should be removed in its entirety from the Minerals Local Plan	It is the view of the MPA that the policy framework covering landscape matters is reflective of local circumstances and is proportionate to the scale and	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM09 | Landscape is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM09 | Landscape is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						with the area which is the subject of a planning application (Gloucestershire County Council reference 15/0108/FDMAJM) which is still 'live' but not under active consideration. In response to that application which, by definition, must apply to the Allocation 01, the Forest of Dean District Council concluded that: "It is judged that the proposal would result in significant short and long-term harm to the character and appearance of the landscape. Furthermore, the proposal does not provide sufficient assessment with regards to the potential impact on local designated and non-designated heritage assets. For these reasons, it is judged that the proposal would be contrary to the NPPF (Sections 11, paras. 109, 110, 115, 116 and 118 and Section 12), National Planning Policy		significance of the issues that may arise. The policy is wholly in accordance with national policy and guidance. It has also been drafted with the support of Natural England. The concern regarding one of the plan's allocations is noted, however, it is not particularly relevant to the drafting of an overarching countywide development management policy.	

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM09 | Landscape is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM09 | Landscape is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Guidance (section Natural Environment), the Gloucestershire Minerals Local Plan (Policies A4 and E2), Section 66 of the 1990 Planning, Listed Buildings and Conservation Areas Act and Policy CSP.1 of the Core Strategy". Thus, to include this Allocation Area in the plan conflicts directly with Policy DM09, in relation to development affecting an AONB. It must be remembered that the Wye Valley AONB is only some 700m from the boundary of the Allocation Area and thus development in this area will affect the setting of the AONB. As the District Council have pointed out, the inclusion of the area is contrary to NPPF 109, 110, 115, 116, 118 AND Section 12)			
802393/3/DM09/USND	Ms A Lapington	Coleford Town Council	No	(2) Not justified (4) Not consistent with national policy	No	Policy DM09 ("Landscape") is UNSOUND in respect of Allocation 01 (Land east of	Allocation Area 01 (land east of Stowe Hill quarry) should be removed in its entirety from the	It is the view of the MPA that the policy framework covering landscape matters is reflective of local	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM09 | Landscape is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM09 | Landscape is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Stowe Hill quarry). This area corresponds exactly with the area which is the subject of a planning application (Gloucestershire County Council reference 15/0108/FDMAJM) which is still 'live' but not under active consideration. In response to that application which, by definition, must apply to the Allocation 01, the Forest of Dean District Council concluded that: "It is judged that the proposal would result in significant short and long-term harm to the character and appearance of the landscape. Furthermore, the proposal does not provide sufficient assessment with regards to the potential impact on local designated and non-designated heritage assets. For these reasons, it is judged that the proposal would be contrary to the NPPF (Sections 11, paras. 109, 110, 115, 116	Minerals Local Plan	circumstances and is proportionate to the scale and significance of the issues that may arise. The policy is wholly in accordance with national policy and guidance. It has also been drafted with the support of Natural England. The concern regarding one of the plan's allocations is noted, however, it is not particularly relevant to the drafting of an overarching countywide development management policy.	

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						and 118 and Section 12), National Planning Policy Guidance (section Natural Environment), the Gloucestershire Minerals Local Plan (Policies A4 and E2), Section 66 of the 1990 Planning, Listed Buildings and Conservation Areas Act and Policy CSP.1 of the Core Strategy". Thus, to include this Allocation Area in the plan conflicts directly with Policy DM09, in relation to development affecting an AONB. It must be remembered that the Wye Valley AONB is only some 700m from the boundary of the Allocation Area and thus development in this area will affect the setting of the AONB. As the District Council have pointed out, the inclusion of the area is contrary to NPPF 109, 110, 115, 116, 118 AND Section 12)			
802011/3/DM09/USND	Mr R S	Clerk Newland Parish	No	(2) Not justified (4) Not consistent	No	Policy DM09 ("Landscape") is	Allocation Area 01 (land east of Stowe	It is the view of the MPA that the policy	No modifications are considered

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	Crighton	Council		with national policy		UNSOUND in respect of Allocation 01 (Land east of Stowe Hill quarry). This area corresponds exactly with the area which is the subject of a planning application (Gloucestershire County Council reference 15/0108/FDMAJM) which is still 'live' but not under active consideration. In response to that application which, by definition, must apply to the Allocation 01, the Forest of Dean District Council concluded that: "It is judged that the proposal would result in significant short and long-term harm to the character and appearance of the landscape. Furthermore, the proposal does not provide sufficient assessment with regards to the potential impact on local designated and non-designated heritage assets. For these reasons, it is judged that the proposal would be	Hill quarry) should be removed in its entirety from the Minerals Local Plan	framework covering landscape matters is reflective of local circumstances and is proportionate to the scale and significance of the issues that may arise. The policy is wholly in accordance with national policy and guidance. It has also been drafted with the support of Natural England. The concern regarding one of the plan's allocations is noted, however, it is not particularly relevant to the drafting of an overarching countywide development management policy.	necessary in response to the representation.

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						contrary to the NPPF (Sections 11, paras. 109, 110, 115, 116 and 118 and Section 12), National Planning Policy Guidance (section Natural Environment), the Gloucestershire Minerals Local Plan (Policies A4 and E2), Section 66 of the 1990 Planning, Listed Buildings and Conservation Areas Act and Policy CSP.1 of the Core Strategy". Thus, to include this Allocation Area in the plan conflicts directly with Policy DM09, in relation to development affecting an AONB. It must be remembered that the Wye Valley AONB is only some 700m from the boundary of the Allocation Area and thus development in this area will affect the setting of the AONB. As the District Council have pointed out, the inclusion of the area is contrary to NPPF 109, 110, 115, 116, 118 AND			

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						Section 12)			
794755/26/DM09/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
794035/5/DM09/SND	Mr Dale Moss	Northcot Brick Ltd	Yes		Yes	Policy DM09 – Landscape Over 50% of Gloucestershire is within designated AONB. The draft Minerals Local Plan follows national policy which seeks to direct mineral development away from the AONB. Whilst it is appreciated this is generally the appropriate approach, where the AONB is so widespread it has the potential to place pressure on those areas of mineral resource outside the AONB. The policy allows for Minerals development within the AONB provided a number of criteria, which seek to protect the special qualities of the AONB and conservation of wildlife and cultural heritage, are		The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

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						complied with and that opportunities to enhance the character, features and qualities of the landscapes and scenic beauty of the AONB are taken. It is considered that the scope of this policy provides an appropriate balance of protection of the AONB without preventing appropriate development that would not adversely impact or prejudice the character and special qualities of the area. Policy DM09 does not set out a definition of major development, instead it is said to be a matter of planning judgement on a case-by-case basis. Whilst it would be helpful to have a clear steer on what constitutes major development, it is acknowledged that this approach is taken from National Planning Policy and is therefore a tested and acceptable approach. Policy			

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						DM09 does allow for major minerals development in exceptional circumstances where the public interest can be demonstrated. It is considered that the criteria set out in Policy DM09 for appropriate development in Areas of Outstanding Natural Beauty is flexible enough to allow for minerals development in AONB when the specific circumstances mean it is the most appropriate mechanism for achieving the required minerals development in the County. Summary			

Matters related to the supporting text to Policy DM09 | Landscape

Publication MLP Consultation Questionnaire Reference | Questions 55.1, 55.2, 55.3, 55.4, 55.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
808023/23/DM09/UNSD	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd	No			Para 389 could be amended to reflect this .		It is the view of the MPA that the supporting text to accompany Publication MLP Policy DM09 is wholly appropriate in setting out the policy justification and to assist in its intended interpretation for applicants and decision-makers. It has been drafted with the support of Natural England.	No modifications are considered necessary in response to the representation.
1038720/54/DM09/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be ‘sound’ and ‘legally compliant’, is noted.	No modifications are considered necessary in response to the representation.
794030/16/DM09/USND	Respondent	Syreford Quarries & Masonry Ltd	No			Policy DM09 | Landscape The treatment of development in AONBs could be given further clarification given the position of long established building stone operations which form part of the AONB environment both physically, both as part of the landscape in their own right and		It is the view of the MPA that the supporting text to accompany Publication MLP Policy DM09 is wholly appropriate in setting out the policy justification and to assist in its intended interpretation for applicants and decision-makers. It has been drafted with the support of Natural England.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						responsible for the built development in that landscape, as well as having a cultural dimension with quarrying a traditional and historic landuse. The text refers to the lack of definition of what is major development but then does not follow through with any meaningful guidance which is unhelpful particularly given the position of the natural stone operations in the AONB. Para 392 talks about a ‘robust comparative analysis’ on non-AONB sources, but does not clarify this means. In terms of the Cotswolds AONB the landscape is formed the underlying limestone that has traditionally been quarried there going back millennium. In Gloucestershire limestone isn’t found in the central vale area and yet is often used there to secure high standards of design in existing			

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						historic buildings and new development (required by other planning policies). There is no 'non-AONB' supply of limestone here. Are we talking about alternative material such as bradstone? Greater clarity needs to be given on something that is otherwise highly subjective			
820738/16/DM09/USND	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd	No			Policy DM09 | Landscape The treatment of development in AONBs could be given further clarification given the position of long established building stone operations which form part of the AONB environment both physically, both as part of the landscape in their own right and responsible for the built development in that landscape, as well as having a cultural dimension with quarrying a traditional and historic landuse. The text refers to the lack of definition of what is major		It is the view of the MPA that the supporting text to accompany Publication MLP Policy DM09 is wholly appropriate in setting out the policy justification and to assist in its intended interpretation for applicants and decision-makers. It has been drafted with the support of Natural England.	No modifications are considered necessary in response to the representation.

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						development but then does not follow through with any meaningful guidance which is unhelpful particularly given the position of the natural stone operations in the AONB. Para 392 talks about a 'robust comparative analysis' on non-AONB sources, but does not clarify this means. In terms of the Cotswolds AONB the landscape is formed the underlying limestone that has traditionally been quarried there going back millennium. In Gloucestershire limestone isn't found in the central vale area and yet is often used there to secure high standards of design in existing historic buildings and new development (required by other planning policies). There is no 'non-AONB' supply of limestone here. Are we talking about alternative material such as bradstone? Greater clarity needs			

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						to be given on something that is otherwise highly subjective			
1164737/54/DM09/USND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1169771/13/DM09/USND	Mr Michael Krier	Chairman Temple Guiting Parish Council	No			Mineral Plan Section 387 makes reference to the AONB and additional measures required to conserve the landscape and scenic beauty. This is welcomed. In this context what measures are proposed to clarify what constitutes quarrying activity and prevent a repeat of the situation currently seen in Guiting Power where there is a significant impact on the area? Clarification of what constitutes quarrying activity at the start of the document would be welcomed.		It is the view of the MPA that the supporting text to accompany Publication MLP Policy DM09 is wholly appropriate in setting out the policy justification and to assist in its intended interpretation for applicants and decision-makers. It has been drafted with the support of Natural England.	No modifications are considered necessary in response to the representation.
793504/16/DM09/USND		Stanway Stone Company	No			Policy DM09 | Landscape The treatment of development in AONBs could be given further clarification given the position of long		It is the view of the MPA that the supporting text to accompany Publication MLP Policy DM09 is wholly appropriate in setting out the policy	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						established building stone operations which form part of the AONB environment both physically, both as part of the landscape in their own right and responsible for the built development in that landscape, as well as having a cultural dimension with quarrying a traditional and historic landuse. The text refers to the lack of definition of what is major development but then does not follow through with any meaningful guidance which is unhelpful particularly given the position of the natural stone operations in the AONB. Para 392 talks about a 'robust comparative analysis' on non-AONB sources, but does not clarify this means. In terms of the Cotswolds AONB the landscape is formed the underlying limestone that has traditionally been quarried there going back		justification and to assist in its intended interpretation for applicants and decision-makers. It has been drafted with the support of Natural England.	

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						millennium. In Gloucestershire limestone isn't found in the central vale area and yet is often used there to secure high standards of design in existing historic buildings and new development (required by other planning policies). There is no 'non-AONB' supply of limestone here. Are we talking about alternative material such as bradstone? Greater clarity needs to be given on something that is otherwise highly subjective			
793895/16/DM09/USND	Respondent	Cotswold Stone Quarries	No			Policy DM09 | Landscape The treatment of development in AONBs could be given further clarification given the position of long established building stone operations which form part of the AONB environment both physically, both as part of the landscape in their own right and responsible for the built development in that landscape, as		It is the view of the MPA that the supporting text to accompany Publication MLP Policy DM09 is wholly appropriate in setting out the policy justification and to assist in its intended interpretation for applicants and decision-makers. It has been drafted with the support of Natural England.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						well as having a cultural dimension with quarrying a traditional and historic landuse. The text refers to the lack of definition of what is major development but then does not follow through with any meaningful guidance which is unhelpful particularly given the position of the natural stone operations in the AONB. Para 392 talks about a 'robust comparative analysis' on non-AONB sources, but does not clarify this means. In terms of the Cotswolds AONB the landscape is formed the underlying limestone that has traditionally been quarried there going back millennium. In Gloucestershire limestone isn't found in the central vale area and yet is often used there to secure high standards of design in existing historic buildings and new development (required by other			

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						planning policies). There is no 'non-AONB' supply of limestone here. Are we talking about alternative material such as bradstone? Greater clarity needs to be given on something that is otherwise highly subjective			
802358/18/DM09/USND	Respondent	Smiths (Gloucester) Ltd	No			Policy DM09 | Landscape The treatment of development in AONBs could be given further clarification given the position of long established building stone operations which form part of the AONB environment both physically, both as part of the landscape in their own right and responsible for the built development in that landscape, as well as having a cultural dimension with quarrying a traditional and historic landuse. The text refers to the lack of definition of what is major development but then does not follow through with any		It is the view of the MPA that the supporting text to accompany Publication MLP Policy DM09 is wholly appropriate in setting out the policy justification and to assist in its intended interpretation for applicants and decision-makers. It has been drafted with the support of Natural England.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						meaningful guidance which is unhelpful particularly given the position of the natural stone operations in the AONB. Para 392 talks about a 'robust comparative analysis' on non-AONB sources, but does not clarify this means. In terms of the Cotswolds AONB the landscape is formed the underlying limestone that has traditionally been quarried there going back millennium. In Gloucestershire limestone isn't found in the central vale area and yet is often used there to secure high standards of design in existing historic buildings and new development (required by other planning policies). There is no 'non-AONB' supply of limestone here. Are we talking about alternative material such as bradstone? Greater clarity needs to be given on something that is otherwise highly			

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM09 (paragraphs 379-392) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						subjective			

Matters related to Policy DM10 | Gloucester–Cheltenham Green Belt

Publication MLP Consultation Questionnaire Reference | Questions 56.1, 56.2, 56.3, 56.4, 56.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM10 | Gloucester–Cheltenham Green Belt is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM10 | Gloucester–Cheltenham Green Belt is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
808023/24/DM10/COM	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd				Policy DM10 – Green Belt – mineral development includes the necessary infrastructure to support it and this should be clear.		It is the view of the MPA that the Green Belt policy set out in the Publication MLP accords with national policy and guidance. The policy is very clear as to subtle difference in approach afforded to the extraction of minerals as opposed to any associated development such as processing infrastructure.	No modifications are considered necessary in response to the representation.
1038720/55/DM10/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be ‘sound’ and ‘legally compliant’, is noted.	No modifications are considered necessary in response to the representation.
1164737/55/DM10/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be ‘sound’ and ‘legally compliant’, is noted.	No modifications are considered necessary in response to the representation.
794755/27/DM10/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be ‘sound’, is noted.	No modifications are considered necessary in response to the representation.
802358/19/DM10/SND	Respondent	Smiths (Gloucester) Ltd	No			The Green belt policy again reiterates national guidance and text	Policy DM10 | Gloucester–Cheltenham Green Belt	It is the view of the MPA that the Green Belt policy set out in the Publication MLP	No modifications are considered necessary in response to the

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM10 | Gloucester–Cheltenham Green Belt is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM10 | Gloucester–Cheltenham Green Belt is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						such as para 395 is in effect meaningless and of no real assistance to operators.	Part A needs to have the word 'and' deleted or be reworded	accords with national policy and guidance. The policy is very clear as to subtle difference in approach afforded to the extraction of minerals as opposed to any associated development such as processing infrastructure.	representation.
793547/8/DM10/USND	Respondent	Elliott and Sons Ltd	No			Part a should make it clear that mineral extraction includes plant directly associated with mineral extraction such as wash plants and screens and crushers. Also, it would be helpful (as the National Guidance is not clear and it is open to interpretation in the Courts) if the Local Plan acknowledged that physically there will of course be some visual impact albeit temporary from any mineral development. There will be physical excavations, bunds or landscape screening, associated vehicles and machinery which are going to affect		It is the view of the MPA that the Green Belt policy set out in the Publication MLP accords with national policy and guidance. The policy is very clear as to subtle difference in approach afforded to the extraction of minerals as opposed to any associated development such as processing infrastructure. Publication MLP paragraph 398 in particular provides clarity in respect of this matter.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM10 | Gloucester–Cheltenham Green Belt is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM10 | Gloucester–Cheltenham Green Belt is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						the openness of the green belt but that this will not necessarily harm the preservation of openness or conflict with the purposes of including land in the Green Belt if sensitively planned with appropriate screening, landscape planting, plant siting and restoration. Agree that for part b in terms of the NNPF ready mix plant and block making are deemed inappropriate development as these are a step beyond extraction. However, there are many sustainable benefits of siting these on mineral sites and if they are well contained by landscape screening and linked to the life of the extraction operation surely the policy should provide more positive criteria to facilitate their approval. The plan should be more positive and openminded about these types of proposals given the opening lines of the			

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM10 | Gloucester–Cheltenham Green Belt is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM10 | Gloucester–Cheltenham Green Belt is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Plan set out in para 1. The Minerals Local Plan is Gloucestershire's opportunity to plan development in the county and it doesn't need to slavishly follow the letter of the NPPF and simply duplicate that guidance if there are sustainable reasons to allow developments in the right circumstances. I note that para 399 lists considerations to take into account which aren't imbedded in National guidance.			

Matters related to the supporting text to Policy DM10 | Gloucester–Cheltenham Green Belt

Publication MLP Consultation Reference | Question 57.1, 57.2, 57.3, 5.4, 57.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM10 (paragraphs 393-399) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM10 (paragraphs 393-399) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1038720/56/DM10/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1164737/56/DM10/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
793547/9/DM10/USND	Respondent	Elliott and Sons Ltd	No			Part a should make it clear that mineral extraction includes plant directly associated with mineral extraction such as wash plants and screens and crushers. Also, it would be helpful (as the National Guidance is not clear and it is open to interpretation in the Courts) if the Local Plan acknowledged that physically there will of course be some visual impact albeit temporary from any mineral development. There will be physical excavations, bunds or landscape screening,		It is acknowledged by the MPA that Publication MLP paragraph 397 would benefit from a revision to provide greater clarity for applicants and decision makers.	**Possible Modifications –** **Under Publication MLP paragraph 397 replace *"mineral working"* with *"mineral extraction"* Also, introduce a new 2nd sentence that reads; *"Evidence that considers both anticipated visual and spatial effects of mineral extraction on the openness of the Green Belt will be required by decision makers."* In addition, delete the final sentence.**

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM10 (paragraphs 393-399) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM10 (paragraphs 393-399) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						associated vehicles and machinery which are going to affect the openness of the green belt but that this will not necessarily harm the preservation of openness or conflict with the purposes of including land in the Green Belt if sensitively planned with appropriate screening, landscape planting, plant siting and restoration. Agree that for part b in terms of the NNPF ready mix plant and block making are deemed inappropriate development as these are a step beyond extraction. However, there are many sustainable benefits of siting these on mineral sites and if they are well contained by landscape screening and linked to the life of the extraction operation surely the policy should provide more positive criteria to facilitate their approval. The plan should be more positive and openminded about			

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM10 (paragraphs 393-399) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM10 (paragraphs 393-399) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						these types of proposals given the opening lines of the Plan set out in para 1. The Minerals Local Plan is Gloucestershire's opportunity to plan development in the county and it doesn't need to slavishly follow the letter of the NPPF and simply duplicate that guidance if there are sustainable reasons to allow developments in the right circumstances. I note that para 399 lists considerations to take into account which aren't imbedded in National guidance.			
802358/20/DM10/USND	Respondent	Smiths (Gloucester) Ltd	No			The first sentence of para 397 is simply repeating part A of the policy. A chance has been lost to provide clarity on matters of openness. The second sentence could clarify if these is referring to considerations relating to openness and ideally expand on these.		There is a difference between mineral extraction and mineral development. Mineral extraction proposals are considered under part a of the policy and ancillary development part b. The NPPF considers mineral extraction to be appropriate development but does not include the supporting	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM10 (paragraphs 393-399) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM10 (paragraphs 393-399) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								infrastructure. The majority of the economic mineral resources within the Gloucester-Cheltenham Green Belt are either clay or sand and gravel which in some instances could be supported by mobile plant and machinery causing minimal harm to the openness of the green belt. Other more significant development must be considered in the context of preserving the openness of the greenbelt whilst recognising that mineral development is of a temporary nature. Insufficient evidence has been provided to suggest a deviation from national policy.	

Matters related to Policy DM11 | Aerodrome safeguarding and aviation safety

Publication MLP Consultation Questionnaire Reference | Questions 58.1, 58.2, 58.3, 58.4, 58.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy DM11 | Aerodrome safeguarding and aviation safety is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy DM11 | Aerodrome safeguarding and aviation safety is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1038720/57/DM11/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1164737/57/DM11/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
794755/28/DM11/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.

Matters related to the supporting text to Policy DM11 | Aerodrome safeguarding and aviation safety

Publication MLP Consultation Questionnaire Reference | Questions 59.1, 59.2, 59.3, 59.4, 59.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy DM11 (paragraphs 400-406) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy DM11 (paragraphs 400-406) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1038720/58/DM11/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1164737/58/DM11/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Matters related to Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses

Publication MLP Consultation Questionnaire Reference | Questions 60.1, 60.2, 60.3, 60.4, 60.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
852145/23/MR01/USND	Mr Nigel Gibbons	Forest of Dean District Council	No	(1) Not positively prepared (3) Not effective		The intent of the policy should be clarified.	The policy MR01 (restoration) should also be amended to “Mineral development proposals must demonstrate high quality restoration and aftercare that will.. “ this removes the “will be permitted” and clarifies the policy intent.	It is the view of the MPA that Publication MLP policy MR01 is fully compliant with national policy and guidance in respect of mineral restoration. It is reasonable and proportionate in its approach and provides clarity as what is expected of applicants in delivering the plan’s ambition for site restoration. It is contested that the suggested changes would make the plan more positive or improves effectiveness.	No modifications are considered necessary in response to the representation.
1164737/59/MR01/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be ‘sound’ and ‘legally compliant’, is noted.	No modifications are considered necessary in response to the representation.
1169771/14/MR01/USND	Mr Michael Krier	Chairman Temple Guiting Parish Council	No			Reinstatement and Management The Minerals Plan Section 11 makes reference to the importance of reinstatement of agricultural land and promoting biodiversity. Para		It is the view of the MPA that Publication MLP policy MR01 is fully compliant with national policy and guidance in respect of mineral restoration. It is reasonable and proportionate in its	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						430 also states monitoring is a vital part of evidence-plan making. However, we have been unable to find reference to any report or survey that looks at the effectiveness of reinstatement of quarries in our area or the combined impact of multiple quarrying sites within the same area of the AONB. Mineral Plan Section 387 makes reference to the AONB and additional measures required to conserve the landscape and scenic beauty. This is welcomed. In this context what measures are proposed to clarify what constitutes quarrying activity and prevent a repeat of the situation currently seen in Guiting Power where there is a significant impact on the area? Clarification of what constitutes quarrying activity at the start of the document would be welcomed. Clarification is needed on the intent of a degree of		approach and provides clarity as what is expected of applicants in delivering the plan's ambition for site restoration.	

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						flexibility in may be shown when analysing individual proposals for small scale natural building stone workings stated in paragraph 174.			
820738/17/MR01/COM	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd				Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses Again a fairly generically worded policy.		It is the view of the MPA that Publication MLP policy MR01 is fully compliant with national policy and guidance in respect of mineral restoration. It is reasonable and proportionate in its approach and provides clarity as what is expected of applicants in delivering the plan's ambition for site restoration. It is contested that the suggested changes would make the plan more positive or improves effectiveness.	No modifications are considered necessary in response to the representation.
794030/17/MR01/COM	Respondent	Syreford Quarries & Masonry Ltd				Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses Again a fairly generically worded policy		It is the view of the MPA that Publication MLP policy MR01 is fully compliant with national policy and guidance in respect of mineral restoration. It is reasonable and proportionate in its approach and provides clarity as	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								what is expected of applicants in delivering the plan's ambition for site restoration. It is contested that the suggested changes would make the plan more positive or improves effectiveness.	
808023/25/MR01/USND	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd				MR01 – There should be acknowledgement that restoration can be completed over a longer period than the mineral extraction, reflecting what we know to be current situation where import of inert material is needed but that is subject to market fluctuations beyond operator's controls.		It is the view of the MPA that Publication MLP policy MR01 is fully compliant with national policy and guidance in respect of mineral restoration. It is reasonable and proportionate in its approach and provides clarity as what is expected of applicants in delivering the plan's ambition for site restoration. In light of national policy, it is not considered reasonable to make any specific reference to variable (including longer) timescales for the carrying out and completing mineral restoration. The proposed policy offers sufficient flexibility under clause i to take account of site-	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								specific circumstances. For a number of reasons it may prove wholly reasonable for restoration to occur over an extended period of time – it just needs to be clearly justified through evidence.	
1038720/59/MR01/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
802358/21/MR01/COM	Respondent	Smiths (Gloucester) Ltd				Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses Again a fairly generically worded policy.		It is the view of the MPA that Publication MLP policy MR01 is fully compliant with national policy and guidance in respect of mineral restoration. It is reasonable and proportionate in its approach and provides clarity as what is expected of applicants in delivering the plan's ambition for site restoration. It is contested that the suggested changes would make the plan more positive or improves effectiveness.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
793504/17/MR01/COM		Stanway Stone Company				Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses Again a fairly generically worded policy.		It is the view of the MPA that Publication MLP policy MR01 is fully compliant with national policy and guidance in respect of mineral restoration. It is reasonable and proportionate in its approach and provides clarity as what is expected of applicants in delivering the plan's ambition for site restoration. It is contested that the suggested changes would make the plan more positive or improves effectiveness.	No modifications are considered necessary in response to the representation.
793895/17/MR01/COM	Respondent	Cotswold Stone Quarries	No			Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses Again a fairly generically worded policy.		It is the view of the MPA that Publication MLP policy MR01 is fully compliant with national policy and guidance in respect of mineral restoration. It is reasonable and proportionate in its approach and provides clarity as what is expected of applicants in delivering the plan's ambition for site restoration. It is contested that the suggested changes would make the plan	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								more positive or improves effectiveness.	

Matters related to the supporting text to Policy MR01 | Restoration, aftercare and facilitating beneficial after-uses

Publication MLP Consultation Questionnaire Reference | Questions 61.1, 61.2, 61.3, 61.4, 61.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
924705/13/MR01/USND	Respondent	Head of Estates & Planning Breedon Aggregates	No			Paragraph 410. A requirement for aftercare over 5 years must only be required in exceptional circumstance and subject to rigorous justification. Paragraph 426 should recognise that pollution control is the remit of the EA through Environmental Permitting and should not be duplicated by the planning process.		It is the view of the MPA that the supporting text under Publication MLP paragraph 410 is accurate concerning the timeframes afforded to aftercare activities. The suggested additional text is considered to be unnecessary. The same view is expressed in respect of the comments made on Publication MLP paragraph 426	No modifications are considered necessary in response to the representation.
808023/26/MR01/USND	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd	No			Para 413 “For existing permitted workings, evidence will be required as to how previously agreed restoration and aftercare commitments will not be adversely affected” – what does this mean ? Para 425. If the aim is to return mineral workings to agriculture and also avoid the bird strike risks then it needs clear direction and support of the use of		It is acknowledged by the MPA that Publication MLP paragraph 413 would benefit from a revision to aid with clarity. In respect of Publication MLP paragraph 425 the first sentence makes the position on imported material clear and therefore no further clarification is necessary. For Publication MLP paragraph 426 the existing explanation	**Proposed Modifications –** **Under Publication MLP paragraph 413 delete the 2nd and 3rd sentences and revise the 4th sentence so it reads; *“Where restoration and aftercare proposals of extant permitted mineral workings need to be revised, careful consideration must be given to any potential adverse***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						inert materials to achieve this. Para 426 should reflect the fact that pollution control issues are addressed the EA and not duplicated by the planning process. Para 427 – timescales should not always be the critical element if the restored land achieves the standards all the other constraint require in designing the site. Para 428 – the waste is not recovered when it is imported, the act of using it beneficially to restore the mineral site causes it to be recovered and it is not appropriate to link it with a landfill policy, as recovery is not landfill. The position on this has evolved considerably and the Plan should reflect that. Where material is imported, it is a resource and should be treated as such as well as providing a beneficial method of dealing with the material arising from other		is sufficient and again, no changes are needed. In the case of Publication MLP 427, concern over the significance given to timescales, is deemed unwarranted as the text is clear that it forms part of a wider assessment of the acceptability for importing materials for restoration. Whilst for Publication MLP paragraph 428 it is accepted that a minor revision would be beneficial.	***impacts on the envisaged, final environmental conditions of the restored site. In all cases the possibility of environmental degradation must be avoided. If revised restoration aims to deliver enhancement opportunities, these must be clearly identified before they can be taken into account. For more substantial mineral developments or those involving a fundamental change to an existing restoration and aftercare scheme, a detailed revised restoration strategy will be required."*** **Under Publication MLP paragraph 428, 1st sentence, add the word "treated" after "Importing…" and delete *"…recovered".* Also, after *"…may be considered"* add *"a recovery operation that is"***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						development that could otherwise be directed to inappropriate spurious schemes.			
1038720/60/MR01/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
793547/10/MR01/USND	Respondent	Elliott and Sons Ltd	No			Strongly disagree - mineral restoration is different to a landfill and should be treated differently as different considerations apply. Mineral sites need to be restored to a satisfactory standard and issues of proximity to waste arisings need to be considered differently in the case of mineral restoration to acknowledge that minerals occur where they are found.		It is acknowledged by the MPA that for Publication MLP paragraph 428 a minor revision would be beneficial to aid clarity.	**Possible Modification –** **Under Publication MLP paragraph 428, 1st sentence, add the word "treated" after "Importing…" and delete *"…recovered".* Also, after *"…may be considered"* add *"a recovery operation that is"***
802358/22/MR01/USND	Respondent	Smiths (Gloucester) Ltd	No			Para 425 should be split as it deal with two different issues, historic stability issues and deliverability of new workings. Para 426 needs to state that this is only necessary when an operation will not be covered by		It is the view of the MPA that Publication MLP paragraph 425 does not warrant any revisions within the context of the representation made. The paragraph is unified in its consideration of the topic of importing materials into	**Possible Modifications –** **Under Publication MLP paragraph 427, delete the entire 1st sentence and replace with; *"Importing materials for restoration purposes must***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						environmental permitting regulation otherwise this is duplication. Para 427 is introducing a further qualification which is not expressed in MR01, why should a proposal justify wider sustainability credentials if the restoration activity involves importation of material. If the restoration meetings I to III of MR01 this should not be required and so this should be delete. Para 428 should be deleted as it is wrong to treat the restoration of minerals sites against the criteria of landfill operations, they are not landfill operations but minerals led development and as such has should not be considered against a waste planning policy.		minerals sites for restoration purposes. For Publication MLP paragraph 426 the existing explanation is sufficient and again, no changes are needed. It is focused on the importation of materials onto minerals sites for restoration purposes which is within the remit of the MPA or sometimes the WPA. The ability to achieve appropriate pollution prevention and pollution risk management measures are potentially important planning matters set out in national policy. For Publication MLP paragraph 427, it is contested that any additional requirements are being put forward. The paragraph is advising that importation that will help to support improvements in soil condition may be viewed as contributing to sustainable development. It also advising on the matters that will need	***contribute to the delivery of sustainable development and evidence to demonstrate this is required."*** **For the 2nd sentence delete *"…possible impacts on" and replace "actions for" with "action on". Also add "(e.g. contributing towards the achievement of reduced greenhouse emissions from transport-related activities)."*** **Under Publication MLP paragraph 428, 1st sentence, add the word "treated" after "Importing…" and delete *"…recovered".* Also, after *"…may be considered"* add *"a recovery operation that is"***

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								to be addressed with importation in order to avoid adverse impacts and to deliver high environmental standards. However it is acknowledged that the paragraph would benefit from revision to aid clarity For Publication MLP paragraph 428 it is also acknowledged by the MPA that a minor revision would be beneficial to aid clarity.	
793504/18/MR01/USND		Stanway Stone Company	No			Para 425 should be split as it deal with two different issues, historic stability issues and deliverability of new workings. Para 426 needs to state that this is only necessary when an operation will not be covered by environmental permitting regulation otherwise this is duplication. Para 427 is introducing a further qualification which is not expressed in MR01, why should a proposal justify wider sustainability credentials if the		It is the view of the MPA that Publication MLP paragraph 425 does not warrant any revisions within the context of the representation made. The paragraph is unified in its consideration of the topic of importing materials into minerals sites for restoration purposes. For Publication MLP paragraph 426 the existing explanation is sufficient and again, no changes are needed. It is focused on the importation of materials onto minerals sites for	**Possible Modifications –** **Under Publication MLP paragraph 427, delete the entire 1st sentence and replace with;** ***"Importing materials for restoration purposes must contribute to the delivery of sustainable development and evidence to demonstrate this is required."*** **For the 2nd sentence delete** ***"…possible impacts on" and replace "actions for" with "action***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						restoration activity involves importation of material. If the restoration meetings I to III of MR01 this should not be required and so this should be delete. Para 428 should be deleted as it is wrong to treat the restoration of minerals sites against the criteria of landfill operations, they are not landfill operations but minerals led development and as such has should not be considered against a waste planning policy.		restoration purposes which is within the remit of the MPA or sometimes the WPA. The ability to achieve appropriate pollution prevention and pollution risk management measures are potentially important planning matters set out in national policy. For Publication MLP paragraph 427, it is contested that any additional requirements are being put forward. The paragraph is advising that importation that will help to support improvements in soil condition may be viewed as contributing to sustainable development. It also advising on the matters that will need to be addressed with importation in order to avoid adverse impacts and to deliver high environmental standards. However it is acknowledged that the paragraph would benefit from revision to aid clarity For Publication MLP	***on". Also add "(e.g. contributing towards the achievement of reduced greenhouse emissions from transport-related activities)."*** **Under Publication MLP paragraph 428, 1st sentence, add the word "treated" after "Importing…" and delete *"…recovered".* Also, after *"…may be considered"* add *"a recovery operation that is"***

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								paragraph 428 it is also acknowledged by the MPA that a minor revision would be beneficial to aid clarity.	
793895/18/MR01/USND	Respondent	Cotswold Stone Quarries	No			Para 425 should be split as it deal with two different issues, historic stability issues and deliverability of new workings. Para 426 needs to state that this is only necessary when an operation will not be covered by environmental permitting regulation otherwise this is duplication. Para 427 is introducing a further qualification which is not expressed in MR01, why should a proposal justify wider sustainability credentials if the restoration activity involves importation of material. If the restoration meetings I to III of MR01 this should not be required and so this should be delete. Para 428 should be deleted as it is wrong to treat the restoration of		It is the view of the MPA that Publication MLP paragraph 425 does not warrant any revisions within the context of the representation made. The paragraph is unified in its consideration of the topic of importing materials into minerals sites for restoration purposes. For Publication MLP paragraph 426 the existing explanation is sufficient and again, no changes are needed. It is focused on the importation of materials onto minerals sites for restoration purposes which is within the remit of the MPA or sometimes the WPA. The ability to achieve appropriate pollution prevention and pollution risks measures are potentially important planning matters set out in national policy.	**Possible Modifications –** **Under Publication MLP paragraph 427, delete the entire 1st sentence and replace with;** ***"Importing materials for restoration purposes must contribute to the delivery of sustainable development and evidence to demonstrate this is required."*** **For the 2nd sentence delete** ***"…possible impacts on" and replace "actions for" with "action on". Also add "(e.g. contributing towards the achievement of reduced greenhouse emissions from transport-related activities)."*** **Under Publication MLP paragraph 428,**

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						minerals sites against the criteria of landfill operations, they are not landfill operations but minerals led development and as such has should not be considered against a waste planning policy.		For Publication MLP paragraph 427, it is contested that any additional requirements are being put forward. The paragraph is advising that importation that will help to support improvements in soil condition may be viewed as contributing to sustainable development. It also advising on the matters that will need to be addressed with importation in order to avoid adverse impacts and to deliver high environmental standards. However it is acknowledged that the paragraph would benefit from revision to aid clarity For Publication MLP paragraph 428 it is also acknowledged by the MPA that a minor revision would be beneficial to aid clarity.	**1st sentence, add the word "treated" after "Importing…" and delete *"…recovered".* Also, after *"…may be considered"* add *"a recovery operation that is"***
1164737/60/MR01/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1029955/1/MR01/COM	Mr	Development Adviser				The Cotswold Canals	Due to the site's	It is the view of the	**Possible**

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
	Neville Nelder	Cotswold Canals Trust				Trust is making comment only in respect of Policy MR01 and of the proposal to extract minerals from the site east of Down Ampney . In November 2016, we drew your attention to the needs of the Cotswold Canals in terms of water storage. We note that Policy MR01 has been amended from your original document, giving more scope to allow for water storage as a suitable after-use. However, this depends on the interpretation of 'sustainable development' - as "development that meets the needs of the present, without compromising the ability of future generations to meet their own needs." We believe that our intentions for water storage at this -or any other suitable - location falls within that definition. We are seeking confirmation that the County Council	proximity to the Canal's route, and the potential for it to be reinstated with water storage capability, we are seeking a much more specific re-phrasing to require any potential applicant to act in accordance with the following; ' The developer should examine and develop proposals to facilitate new water storage infrastructure that will contribute to the long-term restoration and operation of the Thames and Severn Canal, being a key element of the national canal network.' In doing so, he should consult with the Cotswold Canals Trust. We strongly request and recommend that this statement replaces your existing sentence in italics above.	MPA that a revision to Publication MLP paragraph 422 would be beneficial to clarify the potential for water-related infrastructure	**Modification –** **Under Publication MLP paragraph 422, add an additional final sentence *"Locally-specific enhancements could also incorporate new or expanded water-storage infrastructure."***

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						agrees with this definition and interpretation. The County Council has been a supporter of the Cotswold Canals Project for over 20 years, leading the process in the early years. We draw your attention to the Cotswold District Local Plan as modified in February 2018, section 12.3, which contains Policy SP3 concerning the Thames and Severn Canal, together with supporting statements {pages 207 & 208}. “Policy SP3 THAMES AND SEVERN CANAL Development will be permitted that: a. positively contributes to the restoration of the Canal and towpath; b. improves access to and along the Canal which encourages use for transport, sport, leisure and recreational purposes; c. respects, improves and enhances the Canal's character,			

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						setting, biodiversity and historic value; d. does not: i. prevent or impair restoration, improvement or reconstruction; ii. destroy its existing or historic route as shown on the proposals map, unless provision is made for its restoration on an acceptable alternative alignment, including the restoration or improvement of the towpath and its linkage with existing rights of way and local communities; iii. result in the loss of any buildings, locks or other structures originally associated with the Canal; or iv. prevent opportunities for public access.” We are strongly of the opinion that your statement is insufficient regarding the Down Ampney site contained in Restoration Opportunities and Constraints, p178 - ‘This could, under			

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						the right circumstances, include facilitating new infrastructure that will contribute towards the long-term restoration and possible expansion ambitions of the Thames and Severn Canal network'.			
1169771/15/MR01/USND	Mr Michael Krier	Chairman Temple Guiting Parish Council	No			Reinstatement and Management The Minerals Plan Section 11 makes reference to the importance of reinstatement of agricultural land and promoting biodiversity. Para 430 also states monitoring is a vital part of evidence-plan making. However, we have been unable to find reference to any report or survey that looks at the effectiveness of reinstatement of quarries in our area or the combined impact of multiple quarrying sites within the same area of the AONB		It is acknowledged by the MPA that monitoring the effectiveness of delivering mineral restoration is an important part of the minerals planning system within Gloucestershire. This will be achieved through the carrying out of the requirements of the MLP Monitoring Schedule set out in Section 12 of the Publication MLP.	No modifications are considered necessary in response to the representation.
801951/1/MR01/COM	Mrs Angela Clayton	Estates Surveyor Defence Infrastructure Organisation				The MODs principle concern relates to ensuring that tall structures especially		The MPA note the comments made. The restoration schemes are unique	No modifications are considered necessary in response to the

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						tall buildings do not cause an obstruction to air traffic movements at MOD aerodromes or compromise the operation of air navigational transmitter/receiver facilities located in the area. As you will be aware air traffic approaches and technical installations at MOD aerodromes are protected with statutory safeguarding zones which identify height consultation zones in the area surrounding MOD aerodromes relative to topography and distance from the sites. The aerodromes are also protected with statutory birdstrike safeguarding consultation zones. Therefore, DIO Safeguarding is concerned with the development of open water bodies, the creation of wetland habitat, refuse and landfill sites. These types of development have the potential to attract large flocking		for every proposal and are dealt with on a case-by-case basis. Although in the case of allocations very specific provisions have been made to ensure aerodrome safeguarding is upheld. All proposals coming forward on land within any aerodrome safeguarding zone will need to demonstrate that effective consultation has occurred with the DIO and effective measures will be put un place in line with policy DM11 aerodrome safeguarding.	representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						bird species hazardous to aviation safety. The MOD statutory safeguarding zone for Gloucestershire county is for the main operational base RAF Fairford, RAF Brize Norton and South Cerney. On reading the Gloucestershire Minerals plan and analysing the proposed site options the principle concern relates to the proposed restoration and aftercare for the mineral extraction schemes. There are many existing mineral extraction sites in place with planning permission for wet restoration. Due to the cumulative impact of the existing sites and their proximity to RAF Fairford the MOD has concerns that by permitting further wet restoration this could potentially increase the risk of birdstrike.			
820738/18/MR01/USND	Mr Tim Beetson	Cotswold Hill Stone Masonry Ltd	No			Para 425 should be split as it deal with two different issues, historic stability		It is the view of the MPA that Publication MLP paragraph 425 does not warrant any	**Possible Modifications –** **Under Publication**

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						issues and deliverability of new workings. Para 426 needs to state that this is only necessary when an operation will not be covered by environmental permitting regulation otherwise this is duplication. Para 427 is introducing a further qualification which is not expressed in MR01, why should a proposal justify wider sustainability credentials if the restoration activity involves importation of material. If the restoration meetings I to III of MR01 this should not be required and so this should be delete. Para 428 should be deleted as it is wrong to treat the restoration of minerals sites against the criteria of landfill operations, they are not landfill operations but minerals led development and as such has should not be considered against a waste planning policy.		revisions within the context of the representation made. The paragraph is unified in its consideration of the topic of importing materials into minerals sites for restoration purposes. For Publication MLP paragraph 426 the existing explanation is sufficient and again, no changes are needed. It is focused on the importation of materials onto minerals sites for restoration purposes which is within the remit of the MPA or sometimes the WPA. The ability to achieve appropriate pollution prevention and pollution risks measures are potentially important planning matters set out in national policy. For Publication MLP paragraph 427, it is contested that any additional requirements are being put forward. The paragraph is advising that importation that will help to support improvements in soil	**MLP paragraph 427, delete the entire 1st sentence and replace with; *"Importing materials for restoration purposes must contribute to the delivery of sustainable development and evidence to demonstrate this is required."* For the 2nd sentence delete *"…possible impacts on" and replace "actions for" with "action on". Also add "(e.g. contributing towards the achievement of reduced greenhouse emissions from transport-related activities)."*** **Under Publication MLP paragraph 428, 1st sentence, add the word "treated" after "Importing…" and delete *"…recovered".* Also, after *"…may be considered"* add *"a recovery operation that is"***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								condition may be viewed as contributing to sustainable development. It also advising on the matters that will need to be addressed with importation in order to avoid adverse impacts and to deliver high environmental standards. However it is acknowledged that the paragraph would benefit from revision to aid clarity For Publication MLP paragraph 428 it is also acknowledged by the MPA that a minor revision would be beneficial to aid clarity.	
794755/29/MR01/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes					The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
794030/18/MR01/USND	Respondent	Syreford Quarries & Masonry Ltd	No			Para 425 should be split as it deal with two different issues, historic stability issues and deliverability of new workings. Para 426 needs to state that this is only necessary when an operation will not be		It is the view of the MPA that Publication MLP paragraph 425 does not warrant any revisions within the context of the representation made. The paragraph is unified in its consideration of the topic of importing	**Possible Modifications –** **Under Publication MLP paragraph 427, delete the entire 1st sentence and replace with;** ***"Importing materials for restoration***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						covered by environmental permitting regulation otherwise this is duplication. Para 427 is introducing a further qualification which is not expressed in MR01, why should a proposal justify wider sustainability credentials if the restoration activity involves importation of material. If the restoration meetings I to III of MR01 this should not be required and so this should be delete. Para 428 should be deleted as it is wrong to treat the restoration of minerals sites against the criteria of landfill operations, they are not landfill operations but minerals led development and as such has should not be considered against a waste planning policy.		materials into minerals sites for restoration purposes. For Publication MLP paragraph 426 the existing explanation is sufficient and again, no changes are needed. It is focused on the importation of materials onto minerals sites for restoration purposes which is within the remit of the MPA or sometimes the WPA. The ability to achieve appropriate pollution prevention and pollution risks measures are potentially important planning matters set out in national policy. For Publication MLP paragraph 427, it is contested that any additional requirements are being put forward. The paragraph is advising that importation that will help to support improvements in soil condition may be viewed as contributing to sustainable development. It also advising on the matters that will need	***purposes must contribute to the delivery of sustainable development and evidence to demonstrate this is required."*** **For the 2nd sentence delete *"…possible impacts on" and replace "actions for" with "action on". Also add "(e.g. contributing towards the achievement of reduced greenhouse emissions from transport-related activities)."*** **Under Publication MLP paragraph 428, 1st sentence, add the word "treated" after "Importing…" and delete *"…recovered".* Also, after *"…may be considered"* add *"a recovery operation that is"***

Representation Reference	Full Name	Organisation Details	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Supporting text to Policy MR01 (paragraphs 407-429) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
								to be addressed with importation in order to avoid adverse impacts and to deliver high environmental standards. However it is acknowledged that the paragraph would benefit from revision to aid clarity For Publication MLP paragraph 428 it is also acknowledged by the MPA that a minor revision would be beneficial to aid clarity.	

Matters related to Section 12 | Managing and monitoring plan delivery (including paragraphs 430-433 and the Monitoring Schedule)

Publication MLP Consultation Reference | Questions 62.1, 62.2, 62.3, 62.4, 62.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Section 12 | Managing and monitoring plan delivery (paragraphs 430-433 including monitoring schedule) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Section 12 | Managing and monitoring plan delivery (paragraphs 430-433 including monitoring schedule) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1038720/61/MON/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation
793641/3/MON/COM	Mr Rohan Torkildsen	South West Region Historic England				The Review Trigger states. "One planning application for minerals development refused where material considerations have specifically outweighed the acceptability of the development in respect of the matters covered by policyDM08". Should this read approved?	Reconsider Review Trigger for DM08.	It is the view of the MPA that the monitoring 'trigger' (i.e. the reason why a review of the policy is needed) Is wholly appropriate as it describes the circumstances were the policy <u>has not</u> been met, but where an applicant has been able to make the case that their proposal is still acceptable. The trigger would mean the MPA would then be required to consider the reasons for the deviation in policy and to look at whether a reworking or better interpretation is needed.	No modifications are considered necessary in response to the representation
1164737/61/MON/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation

Representation Reference	Full Name	Organisation Details	Do you consider that the Section 12 | Managing and monitoring plan delivery (paragraphs 430-433 including monitoring schedule) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Section 12 | Managing and monitoring plan delivery (paragraphs 430-433 including monitoring schedule) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1169771/16/MON/SND	Mr Michael Krier	Chairman Temple Guiting Parish Council	Yes			Managing and Monitoring: The opening comment (paragraph 430) that “Monitoring is a vital part of evidence-based plan making” is welcomed but clearly requires consistency of staffing and funding to make this work. Recent unfortunate experiences have clearly demonstrated that whilst Plans are good they only work if they are fully supported and resourced. It is also of note that greater coordination is needed between all three tiers of local government and planning. This includes clarification of applications requiring extensive groundworks and what constitutes quarrying activities, as seen in neighbouring Parishes.		The MPA acknowledged the comments raised.	No modifications are considered necessary in response to the representation
794755/30/MON/SND	Mr Rob Levenston	Strategic Policy & Specialist Advice Team South Gloucestershire Council	Yes			The suite of policies included within the MLP provide a comprehensive and appropriate framework to guide		The representation, which considers this matter to be ‘sound’, is noted.	No modifications are considered necessary in response to the representation

Representation Reference	Full Name	Organisation Details	Do you consider that the Section 12 | Managing and monitoring plan delivery (paragraphs 430-433 including monitoring schedule) is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Section 12 | Managing and monitoring plan delivery (paragraphs 430-433 including monitoring schedule) is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						minerals development across the County and, in doing so, to deliver against the Plan's strategy and its vision. Officers also note and support the inclusion of measures to monitor policy effectiveness as the plan period progresses, in line with the cyclical process of Local Plan preparation: survey, analyse, plan.			

Matters related to Appendix 1 | Key Diagram

Publication MLP Consultation Questionnaire Reference | Question 63.1, 63.2, 63.3, 63.4, 63.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 1 | Key diagram is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 1 | Key diagram is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1038720/62/KDI/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1164737/62/KDI/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Matters related to Appendix 2 | Safeguarded Mineral Infrastructure Sites

Publication MLP Consultation Questionnaire Reference | Questions 64.1, 64.2, 64.3, 64.4, 64.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 2 | Safeguarded mineral infrastructure sites is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 2 | Safeguarded mineral infrastructure sites is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/63/SMI/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
793547/11/SMI/COM	Respondent	Elliott and Sons Ltd				Under 'Sites for handling and / or processing and distributing recycled and secondary aggregates' it doesn't list Elliott's recycling site at Shurdington. Given the 'the Strategy' seeks 'To support local decision makers in giving weight to the planning merits of increasing the use of recycled and secondary aggregates as an alternative to primary land-won aggregates' this site should be added to this list so that it benefits from the same protection as the other sites listed, provided by Policy MS02 - Safeguarding mineral infrastructure.		The MPA notes the comments concerning the accuracy of Publication MLP Appendix 2 and acknowledges that a revision to the table of safeguarded mineral infrastructure sites is necessary.	**Possible Modification –** **Add to the table under *'Sites for handling and / or processing and distributing recycled and secondary aggregates'* the following location: - *'Land at Shurdington Road, Cheltenham, GL51 4UA'* A footnote should also be provided to confirm the temporary nature of the use, which currently expires in October 2026 (see GCC Planning Reference: 17/0075/TWMAJW).**
924705/14/SMI/COM	Respondent	Head of Estates & Planning Breedon Aggregates					Appendix 2: the existing concrete batching plant at	The MPA notes the comments concerning the	**Possible Modification –**

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 2 | Safeguarded mineral infrastructure sites is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 2 | Safeguarded mineral infrastructure sites is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
							Clearwell Quarry has not been listed.	accuracy of Publication MLP Appendix 2 and acknowledges that a revision to the table of safeguarded mineral infrastructure sites is necessary.	**Add to the table under *'Concrete batching plant'* the following location: - *'Land at Clearwell Quarry, Stowe Green, St. Briavels GL15 6QW'* A footnote should also be provided to confirm the temporary nature of the use, which currently expires in December 2025 (see GCC Planning Reference: DF/2238/X).**
808023/27/SMI/COM	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd				Appendix 2 Safeguarded sites - Should there not be Hills CB Plants and inert recycling ? They may be temporary, but still should be safeguarded		The MPA notes the comments concerning the accuracy of Publication MLP Appendix 2 and acknowledges that a revision to the table of safeguarded mineral infrastructure sites is necessary.	**Possible Modifications –** **Add to the table under *'Concrete batching plant'* the following location: - *'Shorncote Quarry Ewen Road South Cerney, Cirencester Gloucestershire, GL7 6DE '* A footnote should also be provided to confirm the temporary nature of the use, which currently expires in 2019 (see GCC Planning Reference: 11/064/CWMAJW).** **Add to the table under *'Sites for***

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 2 | Safeguarded mineral infrastructure sites is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 2 | Safeguarded mineral infrastructure sites is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
									***handling and / or processing and distributing recycled and secondary aggregates*' the following location: '*Shorncote Quarry, Ewen Road, South Cerney, Cirencester Gloucestershire, GL7 6DE*' A footnote should also be provided to confirm the temporary nature of the use, which currently expires in 2027 (see GCC Planning Reference: 17/0109/CWMAJW.**
1038720/63/SMI/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Matters related to Appendix 3 | Forecast of aggregate supplies and provision figures

Publication MLP Consultation Questionnaire Reference | Question 65.1, 65.2, 65.3, 65.4, 65.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 3 | Forecast of aggregate supplies and provision figures is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 3 | Forecast of aggregate supplies and provision figures is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1028219/19/AGS/USND	Ms Nicola Packer		No	(2) Not justified		The plan should be supply led not demand led. New techniques and materials would meet any shortfall between supply and demand.	Reduce these quantities significantly.	It is the view of the MPA that figures presented in Appendix 3 have been prepared in accordance with national policy and guidance on this matter. No detailed and robust justification has been presented to suggest an alternative scenario should be followed.	No modifications are considered necessary in response to the representation.
808023/28/AGS/COM	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd				Appendix 3 – Table on aggregate provision should be confirmed as “minimum		The MPA note the comment made and consider it justified to make the suggested revision.	**Proposed Modifications –** **Under the 3rd table, replace the main title with *“Number of years worth of provision to be considered by the plan”* Also, replace *“Total requirement (years)”* with *“Total number of years”*** **Under the 4th table, replace *“A Requirement (years)”* with *“A Number of years”.* Also, replace *“B Annual provision (mt)”* with *“ B***

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 3 | Forecast of aggregate supplies and provision figures is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 3 | Forecast of aggregate supplies and provision figures is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
									Minimum annual provision amount (in mt)" **and replace** ***" C Total requirement"*** **with** ***"C Total requirement to meet minimum provision"*****. In addition, replace** ***"Provision requirement for plan C-(D+E)"*** **with** ***"Minimum provision requirement to be considered by the plan | C-(D+E)"***
1038720/64/AGS/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1164737/64/AGS/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

Matters related to Allocation 01 : Land east of Stowe Hill Quarry

Publication MLP Consultation Questionnaire Reference | Questions 66.1, 66.2, 66.3, 66.4, 66.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 01 : Land east of Stowe Hill Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 01 : Land east of Stowe Hill Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1028219/20/AL01/USND	Ms Nicola Packer		No	(2) Not justified (4) Not consistent with national policy	No	Development of this site has been refused planning permission. It should not be included for the reasons that it was refused planning permission.	Omit 'Allocation 01 Land east of Stowe Hill Quarry'	It is the view of the MPA that Publication Appendix 4 should be revised in light of evidence received during the publication consultation stage relating to the deliverability of one of the plan's allocations.	**Possible Modification –** **Removal of the reference to Allocation 01 on the introductory page for Appendix 4 (page 144) and also the omission of pages 145 to 150 which present in full the Detailed Development Requirements for Allocation 01: Land east of Stowe Hill Quarry.**
924705/15/AL01/USND	Respondent	Head of Estates & Planning Breedon Aggregates	No			The requirements for Allocation 01: Land east of Stowe Hill Quarry are included in Appendix 4: Allocation 1 Stowe Hill Quarry. For Allocation 1, it is questioned why Health Impact and Economic Impact Assessments are required when they have not been required to date in the three Planning Applications for this land submitted since 2014? This also conflicts with	The requirement for Health Impact and Economic Impact Assessments should be deleted as the scope of the ES/Planning Application should not be established in this Plan as it creates a potentially unnecessary burden on the Operator/Application. Instead a recommendation should be given that the scope of any Planning Application/EIA	It is the view of the MPA that the Detailed Development Requirements for the allocation do not specifically require a Health Impact Assessment to be carried out. It seeks that the issue be investigated to determine whether such an assessment HIA would be necessary. Furthermore, the requirement to complete an Economic Impact	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 01 : Land east of Stowe Hill Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 01 : Land east of Stowe Hill Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Paragraph 246 which recognises that the actual topics to be considered will be detailed at the 'planning application stage that the significance of any additional or changed matters will need to be carefully investigated to determine how they should be factored into the decision making process'.	should be established before submission of an application which could include the consideration of health and economic impacts.	Assessment is deemed to be proportionate and reasonable in respect of the likely size, scale and longevity of any future mineral development proposal. Nevertheless, Publication Appendix 4 should be revised in light of evidence received during the publication consultation stage relating to the deliverability of one of the plan's allocations.	
855340/3/AL01/USND	Mr John James		No	(1) Not positively prepared (4) Not consistent with national policy	Yes	Regarding Stowe Hill Quarry Natural England have indicated that the development of Stow Hill quarry is likely to affect the nationally important SSSI at Slade Brook. This is a unique location within the country and possibly wider for the formation of tuffa dams. Water from the whole area included in the plan feed into Slade Brook. Chemical changes are likely to affect tufer formation.	Amy quarrying in the vicinity of the SSSI should be excluded from the plan	It is the view of the MPA that Publication Appendix 4 should be revised in light of evidence received during the publication consultation stage relating to the deliverability of one of the plan's allocations.	**Possible Modification –** **Removal of the reference to Allocation 01 on the introductory page for Appendix 4 (page 144) and also the omission of pages 145 to 150 which present in full the Detailed Development Requirements for Allocation 01: Land east of Stowe Hill Quarry.**

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 01 : Land east of Stowe Hill Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 01 : Land east of Stowe Hill Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1038720/65/AL01/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes				No modifications are considered necessary in response to the representation.
810002/2/AL01/COM	Respondent	Welsh Water				Of the three mineral allocation sites within the Forest of Dean District Council area, all are within our operational area for sewerage. Our nearest assets are approximately 400m (Allocation 01), 300m (Allocation 02) and 500m (Allocation 03) away respectively from the three preferred areas, therefore we have no specific comment to make.		The MPA acknowledge the comments made in respect of Publication MLP Allocation 01.	No modifications are considered necessary in response to the representation.
852145/24/AL01/USND	Mr Nigel Gibbons	Forest of Dean District Council	No	(1) Not positively prepared (2) Not justified (4) Not consistent with national policy		The MLP identifies additional potential reserves of 10-17MT at Stowe Hill/ Clearwell. This would be delivered through a proposal to identify land beyond that currently identified in the outgoing MLP. The land concerned is in part covered by one current planning application (17/0122/FDMAJM) and is wholly within another larger proposal also yet to be determined (15/0108/FDMAJM).	Two different considerations apply when considering changes that are necessary. The first is landscape and the need to embed in the MLP a strategic landscape requirement which should preferably be shown on the policies map and inset map in App4. The second area of potential change is more uncertain. It revolves around the need to establish to the level of	It is the view of the MPA that Publication Appendix 4 should be revised in light of evidence received during the publication consultation stage relating to the deliverability of one of the plan's allocations.	**Possible Modification –** **Removal of the reference to Allocation 01 on the introductory page for Appendix 4 (page 144) and also the omission of pages 145 to 150 which present in full the Detailed Development Requirements for Allocation 01: Land east of Stowe Hill Quarry.**

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 01 : Land east of Stowe Hill Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 01 : Land east of Stowe Hill Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						These raise some issues such as landscape that are considered within the MLP and other important issues which need to be resolved. The potential contribution is the largest of the three sites, and without material from this site there is a very strong possibility that there would be a shortfall in the MLP future provision and the plan as published would need to be modified in order to be able to be found sound. The total area proposed to be identified in the MLP is about 54ha, and is additional to the previous areas identified in the previous MLP of April 2003. The proposed preferred area would then enable up to 28years' further production at the maximum rate of extraction that is currently permitted. The two current planning applications have focussed attention on this site and there are some major issues to be	confidence required for a plan allocation that the proposed allocation can be made with the expectation that it will not have an adverse impact on the SSSI when taken up. It is considered appropriate to reduce the extent of the MLP Stowe Hill preferred area or to identify within it broad areas for strategic landscaping. The measures likely to be needed should be broadly described under "detailed requirements", APP4. Screening by planting and appropriate, probably irregular, bunding are likely to be needed. This would provide greater certainty in respect of guiding planning applications and would give some protection especially along the B4228. Such a move could assist planning applications by clearly setting out a basic requirement in advance. It is hoped that MLP will prior to submission resolve the Slad Brook issue, so that the submitted		

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						resolved which are apparent in their consideration so far. The principle that this existing quarry should if possible contribute to future needs is however accepted. The proposal in the MLP is for an extensive preferred area to be identified. This includes sensitive and prominent landscapes and land directly abutting the B4228 and around the northern and north western edge of the proposed preferred area. While other boundaries and views into the site must be carefully considered, the importance of the boundary to the north, northwest and to the B4228 is such that the MLP should address it specifically using the “inset map” and a notation to signify the need for strategic landscaping. The quality of the environment is an important factor which attracts tourists and protection of views	MLP will be able to show that it has sufficient evidence to confidently allocate a preferred area. Currently it is not clear what impact if any this important issue (protection of the SSSI) may have (for example requiring a reduction of the preferred area and/ or limiting the potential depth of the workings). The “detailed development requirements” should be amended to make clear any mitigation required in order to ensure that there is a reasonable expectation that the preferred area can be exploited. This may require additional evidence and / or a change to the area shown. The requirement is for additional evidence and actions based on this so it is not possible to say what changes are required to the present draft MLP.		

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						and landscapes is essential to safeguard this. Although the “detailed requirements” in the appendix to the MLP have been reviewed and expanded, it is considered that these could be more prescriptive at least in setting out the general form of any expected landscaping and required distances from the main highways. The one issue that is referred to in the MLP “detailed requirements” and appears to be most difficult to resolve is that of hydrology and the potential effect of the development on Slad Brook SSSI. The guidance in the NPPF (118) is that development likely to have an adverse effect on an SSSI should not normally be permitted. Minerals Plans should follow this approach in making allocations (NPPF para 143 6th point).The MLP outlines this issue but does not suggest			

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						a solution or (in the light of the current NE and EA views expressed in relation to the planning application) at present give sufficient confidence that one can be found so as to enable the proposed area to contribute to the MLP supply. At the time of writing of this response (July 2018) that there were still major concerns by the EA and NE and they have both objected to the smaller application after considering the latest material available in June 2018. It is recognised that the two planning applications need to be considered in a different manner to the potential preferred area in the MLP. The applications are detailed proposals for extraction in a particular way. The MLP seeks to identify land from which it is reasonable to assume mineral extraction could successfully take place. Allocation in the MLP is therefore			

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						no guarantee that a particular application will succeed although it would be expected to if the detailed requirements set out in the MLP are met. These requirements set out the issues which need to be satisfactorily addressed by planning applications and although the issues that are identified in the draft MLP are comprehensive, it is considered that there is not sufficient confidence (which could be demonstrated through reference to supporting evidence) in the MLP to support the allocation of the preferred area. The early restoration of Clearwell Quarry is strongly supported as is the progressive restoration of the remainder of the undertaking.			
1164737/65/AL01/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes			Not applicable.	Not applicable.	The representation, which considers this matter to be ‘sound’ is noted.	No modifications are considered necessary in response to the representation.
1169539/2/AL01/USND	Mrs Heather James		No	(2) Not justified	Yes	Re: Stowe Hill Quarry 1. Natural England	Stop further expansion at Stowe Hill quarry to protect	It is the view of the MPA that Publication Appendix 4 should	**Possible Modification –**

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						indicated that development of this quarry is likely to affect the SSSI at Slade Brook which is an important location for the formation of tuffa dams. Further deeper extraction from the quarry is likely to alter the water type and flow and affect the dam formation. 2. If the plan is not sufficiently regarding health and social problems for the vicinity of the quarry: 3 population centres close by (Clearwell, St Briavels, Bream) dust from extraction will remain to be ingested by inhabitants. 3. Separation distance for a local resident is proposed at only 100 metres. The distance normally imposed by authorities is about 200 - 250 metres.	local residents	be revised in light of evidence received during the publication consultation stage relating to the deliverability of one of the plan's allocations.	**Removal of the reference to Allocation 01 on the introductory page for Appendix 4 (page 144) and also the omission of pages 145 to 150 which present in full the Detailed Development Requirements for Allocation 01: Land east of Stowe Hill Quarry.**
1169920/6/AL01/USND	Mark Davies	Environment Agency	No	(2) Not justified (3) Not effective (4) Not consistent with national policy		Appendix 4 - Allocation 01: Land east of Stowe Hill Quarry We have raised some concerns on the inclusion of Stowe Quarry as detailed in our	We would welcome a meeting to discuss this and request that you reconsider this part of the mineral plan as discussed in our previous correspondence to the plan (24	It is the view of the MPA that Publication Appendix 4 should be revised in light of evidence received during the publication consultation stage relating to the deliverability of one	**Possible Modification –** **Removal of the reference to Allocation 01 on the introductory page for Appendix 4 (page 144) and also**

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						previous representations. We would question whether this is the best site on the basis of information submitted as part of the planning application / EIA to date. We note in Policy MA01 that "Mineral development proposals for the working of aggregates within allocations will be permitted, subject to satisfying the detailed development requirements set out in the plan for each allocation (see appendix 4)…" What concerns us the most is that Allocation 01 still has a much larger area for consideration within the plan despite our suggestions to reconsider this in light of all of the issues we have experienced with the planning application for the much smaller extension area at Stowe Hill quarry (17/0122/FDMAJM). There are genuine concerns that quarrying could	November 2016, reference SV/2013/107054/CS-04/PO1-L01) where we sought more sustainable options to be considered.	of the plan's allocations.	**the omission of pages 145 to 150 which present in full the Detailed Development Requirements for Allocation 01: Land east of Stowe Hill Quarry.**

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						detrimentally impact upon the Slade Brook SSSI [see our latest response of 29 June 2018, reference SV/2017/109712/03-L01]. This is a part of the plan which requires discussions with you (GCC) going forward, which we have suggested in recent emails to you. It may be that some revisions could be made to the development requirements if you consider the site necessary and acceptable in principle. Our concern is that if the site remains in the plan then this will become an issue at the application stage with the precedent set that this area is available for future quarrying. This larger area represents a potential considerable risk to the Slade Brook springs SSSI from the quarrying activities from a water quantity and water quality perspective, as demonstrated by the			

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						discussion we have had to date over the last few years. The site would fall well within the sensitive flow 'catchment area' as defined by Envireau Water on behalf of Breedon Aggregates. Cumulatively, with the other existing quarries within this area, if this larger proposed Allocation 01 area is considered it could represent the majority if not all of the slow flow catchment which supports Slade Brook SSSI springs where potential irreversible impacts could occur from quarrying activities.			
801951/2/AL01/SND	Mrs Angela Clayton	Estates Surveyor Defence Infrastructure Organisation	Yes			On reviewing Appendix 4: Detailed development requirements for plan allocations, I can confirm the allocations 1-5 fall outside of the statutory safeguarding areas. Therefore, we have no objections to these sites being allocated.		The MPA acknowledge the comments made in respect of Publication MLP Allocation 01.	No modifications are considered necessary in response to the representation.
793641/4/AL01/COM	Mr Rohan	South West Region Historic England				Due to the potential impact on the		It is the view of the MPA that Publication	**Possible Modification –**

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 01 : Land east of Stowe Hill Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 01 : Land east of Stowe Hill Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
	Torkildsen					significance of the Clearwell Historic Park (Grade II) and the Toll House Listed Building (Grade II), Historic England notes reference in Appendix 4 of the MLP of the need for further evidence to be provided to demonstrate how harm can be avoided or minimised to an acceptable degree which “may introduce restraints to future mineral working” (MLP SA page 383).		Appendix 4 should be revised in light of evidence received during the publication consultation stage relating to the deliverability of one of the plan’s allocations.	**Removal of the reference to Allocation 01 on the introductory page for Appendix 4 (page 144) and also the omission of pages 145 to 150 which present in full the Detailed Development Requirements for Allocation 01: Land east of Stowe Hill Quarry.**
1116790/3/AL01/USND	Respondent	Senior Advisor - Sustainable Development Natural England	No	(1) Not positively prepared (2) Not justified (3) Not effective (4) Not consistent with national policy		We consider that the Publication Plan is unsound with regards to Policy MA01 and Allocation 1, Land East of Stowe Hill Quarry. We do not agree with the conclusions set out in Policy MA01 and Allocation 1 Land east of Stowe HIll Quarry. Our key concerns are outlined below and are specific to the allocation at Stowe Hill Quarry: - Principle of mineral working for Stowe Hill Quarry has not been accepted, as stated within Policy MA01 and Allocation		It is the view of the MPA that Publication Appendix 4 should be revised in light of evidence received during the publication consultation stage relating to the deliverability of one of the plan’s allocations.	**Possible Modification –** **Removal of the reference to Allocation 01 on the introductory page for Appendix 4 (page 144) and also the omission of pages 145 to 150 which present in full the Detailed Development Requirements for Allocation 01: Land east of Stowe Hill Quarry.**

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						1 - The current allocation site for Stowe Hill Quarry is considered to be high risk due to the hydrological links to Slade Brook SSSI - Reservations regarding the viability and deliverability of the allocation at Stowe Hill Quarry - The monitoring of the proposal would not adequately prevent any impacts from occurring - The adequacy and effectiveness of the proposed restoration scheme as a form of mitigation - The mitigation as currently stated with the Minerals Plan is now considered our of date - Natural England objection to the most recent planning application is still outstanding, and highlights issues of deliverability Further details regarding these issues have been provided in Appendix 1			

Matters related to Allocation 02: Land west of Drybrook Quarry

Publication MLP Consultation Questionnaire Reference | Questions 67.1, 67.2, 67.3, 67.4, 67.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 02: Land west of Drybrook Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 02: Land west of Drybrook Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1038720/66/AL02/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be ‘sound’ and ‘legally compliant’, is noted.	No modifications are considered necessary in response to the representation.
801951/3/AL02/SND	Mrs Angela Clayton	Estates Surveyor Defence Infrastructure Organisation	Yes			On reviewing Appendix 4: Detailed development requirements for plan allocations, I can confirm the allocations 1-5 fall outside of the statutory safeguarding areas. Therefore, we have no objections to these sites being allocated.		The representation, which considers this matter to be ‘sound’, is noted.	No modifications are considered necessary in response to the representation.
852145/25/AL02/SND	Mr Nigel Gibbons	Forest of Dean District Council	Yes			The proposed preferred are which is a slightly smaller version of that in the previous MLP is supported. The “detailed requirements” include reference to the need for landscaping of the proposed extension. Importantly they also refer to the local highway issue. It is likely that traffic generated by the quarry	How does the plan need changing? It would be helpful to further emphasise the importance of mitigation of the impacts of quarry traffic on the village in the “detailed requirements”.	The representation, which considers this matter to be ‘sound’, is noted. The additional comment regarding the need for traffic generation concerns to be highlighted is also noted. However, this matter has been adequately addressed under the “Local communities” theme of the Detailed Development Requirements and	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 02: Land west of Drybrook Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 02: Land west of Drybrook Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						will need to pass through the village of Drybrook. The working capacity (250 000tpa) should not be exceeded and where necessary environmental improvements to mitigate the impact of the traffic generated (especially HGVs) should be sought.		therefore no revisions are necessary.	
1164737/66/AL02/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
810002/3/AL02/COM	Respondent	Welsh Water				Of the three mineral allocation sites within the Forest of Dean District Council area, all are within our operational area for sewerage. Our nearest assets are approximately 400m (Allocation 01), 300m (Allocation 02) and 500m (Allocation 03) away respectively from the three preferred areas, therefore we have no specific comment to make.		The representation is noted.	No modifications are considered necessary in response to the representation.
1169920/7/AL02/COM	Mark Davies	Environment Agency					Our comments on site allocations also mention the recommendation of	It is the view of the MPA that a revision to the 'Water Resources' theme of	**Possible Modification –** **Under the 'Water**

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 02: Land west of Drybrook Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 02: Land west of Drybrook Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
							text for “maintaining or improvement in water quality to meet WFD objectives in the site allocations text, where it says “contribute towards protecting and improving the water environment in line with…” We would advise (for this and other allocations) that the Water Resources section could also cross reference to WFD in the final paragraph so it reads in line with the ‘x’ River Basin Management Plan and WFD catchment(s).	the Detailed Development Requirements in responses to comments made by the EA, would be beneficial and justified.	**Resources’ theme include *“…Wye and Severn Vale Catchment Management Plans.”* in the final sentence after *“…Severn River Basin Management Plan (RBMP)…”***

Matters related to Allocation 03: Depth extension to Stowfield Quarry

Publication MLP Consultation Questionnaire Reference | Questions 68.1, 68.2, 68.3, 68.4, 68.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 03: Depth extension to Stowfield Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 03: Depth extension to Stowfield Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1038720/67/AL03/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
801951/4/AL03/SND	Mrs Angela Clayton	Estates Surveyor Defence Infrastructure Organisation	Yes			On reviewing Appendix 4: Detailed development requirements for plan allocations, I can confirm the allocations 1-5 fall outside of the statutory safeguarding areas. Therefore, we have no objections to these sites being allocated.		The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
852145/26/AL03/SND	Mr Nigel Gibbons	Forest of Dean District Council	Yes			The proposed allocation is generally supported subject to the detailed requirements being met.		The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1164737/67/AL03/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
810002/4/AL03/COM	Respondent	Welsh Water				Of the three mineral allocation sites within the Forest of Dean District Council area, all are within our operational area for		The representation is noted.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 03: Depth extension to Stowfield Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 03: Depth extension to Stowfield Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						sewerage. Our nearest assets are approximately 400m (Allocation 01), 300m (Allocation 02) and 500m (Allocation 03) away respectively from the three preferred areas, therefore we have no specific comment to make.			
1169920/8/AL03/COM	Mark Davies	Environment Agency					Our comments on site allocations also mention the recommendation of text for “maintaining or improvement in water quality to meet WFD objectives in the site allocations text, where it says “contribute towards protecting and improving the water environment in line with…”	It is the view of the MPA that a revision to the ‘Water Resources’ theme of the Detailed Development Requirements in responses to comments made by the EA, would be beneficial and justified.	**Possible Modification –** **Under the ‘Water Resources’ theme include *“…Wye and Severn Vale Catchment Management Plans.”* in the final sentence after *“…Severn River Basin Management Plan (RBMP)…”***

Matters related to Allocation 04: Land northwest of Daglingworth Quarry

Publication MLP Consultation Questionnaire Reference | Questions 69.1, 69.2, 69.3, 69.4, 69.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 04 : Land northwest of Daglingworth Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 04 : Land northwest of Daglingworth Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/68/AL04/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
1169920/9/AL04/COM	Mark Davies	Environment Agency					Our comments on site allocations also mention the recommendation of text for "maintaining or improvement in water quality to meet WFD objectives in the site allocations text, where it says "contribute towards protecting and improving the water environment in line with…" We would advise (for this and other allocations) that the Water Resources section could also cross reference to WFD in the final paragraph so it reads in line with the 'x' River Basin Management Plan and WFD catchment(s).	It is the view of the MPA that a revision to the 'Water Resources' theme of the Detailed Development Requirements in responses to comments made by the Environment Agency would be beneficial and justified.	**Possible Modification –** **Under the 'Water Resources' theme include: -** ***"…Thames Catchment Management Plans."*** **in the final sentence after** ***"…Severn River Basin Management Plan (RBMP)…"***
1164090/21/AL04/USND	Mr Michael Carr		No	(1) Not positively prepared	No	The proposed quarry extension will materially effect the setting of a grade 2	Additional proposals for mitigation should be prepared to give assurance that the	It is the view of the MPA that matters relating to the risk of unacceptable	No modifications are considered necessary in response to the

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 04 : Land northwest of Daglingworth Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 04 : Land northwest of Daglingworth Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						listed High Tun Barn. Noise, dust and vibration will also have an adverse impact on nearby properties.	impact can physically (not just theoretically) be mitgated in such a sensitive setting.	impacts on heritage assets have been proportionately considered and that sufficient provision *(through requirements to assess potential impacts and to put in place the right mitigation, if needed)* has been made in the plan to ensure the issue will be effectively addressed. The same approach has been taken with amenity impacts linked to nearby properties.	representation.
858234/3/AL04/SND	Respondent	Highways England	Yes		Yes	The MLP identifies existing mineral sites to be safeguarded, as well 7 new allocations and /or extensions. Of the 7 sites identified, 3 are positioned within a reasonable distance of the SRN (A417/A419), in that Highways England should be consulted on any traffic impacts identified for the SRN. These include: • Allocation 04: Land northwest of Daglingworth Quarry; • Allocation 05: Land south and west of		The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 04 : Land northwest of Daglingworth Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 04 : Land northwest of Daglingworth Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Naunton Quarry; • Allocation 06: Land south east of Down Ampney; and • Allocation 07: Land at Lady Lamb Farm, west of Fairford; Applying the principles of paragraph 9 and 10 of Circular 02/2013, development proposals are likely to be unacceptable, by virtue of a severe impact, if they increase demand for use of a section (of the SRN) that is already operating at over-capacity levels, or cannot be safely accommodated. Highways England believes that MLP makes appropriate reference to the SRN and includes policies and objectives that require any new mineral site considerations to consult Highways England. These, like any new development, would be required to submit a planning application submission, with transport evidence, and if necessary mitigation, presented			

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 04 : Land northwest of Daglingworth Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 04 : Land northwest of Daglingworth Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						to support the proposals and to offset any severe development impacts identified for the SRN Highways England is of the view that the scale of mitigation likely to be required to offset development impacts in the context of the Plan, will be within the ability of site owners/operators to fund.			
1038720/68/AL04/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
801951/5/AL04/SND	Mrs Angela Clayton	Estates Surveyor Defence Infrastructure Organisation	Yes			On reviewing Appendix 4: Detailed development requirements for plan allocations, I can confirm the allocations 1-5 fall outside of the statutory safeguarding areas. Therefore, we have no objections to these sites being allocated.		The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
793641/5/AL04/COM	Mr Rohan Torkildsen	South West Region Historic England				Historic England notes that the GCC site assessment 2016 identifies the site of a possible	It will be important to recognise that the recommendations of the (required) further heritage assessment	It is the view of the MPA that a revision to the 'Historic environment – including	**Possible Modification –** **Under the 'Historic environment –**

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 04 : Land northwest of Daglingworth Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 04 : Land northwest of Daglingworth Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						Bronze Age barrow, and an earthwork bordering the south eastern boundary of the site which forms a part of the late Iron Age-early Roman settlement of Bagendon.	may limit the potential quarrying to accord with MLP DM08 and national planning policy.	archaeology' theme of the Detailed Development Requirements in responses to comments made by Historic England would be beneficial and justified.	**including archaeology' theme revise the 2nd to last sentence so that it reads: *"Of potential relevance that could result in restrictions upon future working proposals, is the presence of a grade II listed milestone (NHL entry: 1090206); a possible Bronze Age barrow; and an earthworks that borders the south eastern boundary of the allocation and forms part of the late Iron Age / early Roman settlement of Bagendon."* In addition, delete the final sentence.**

Matters related to Allocation 05: Land south and west of Naunton Quarry

Publication MLP Consultation Reference | Questions 70.1, 70.2, 70.3, 70.4, 70.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 05: Land south and west of Naunton Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 05: Land south and west of Naunton Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
858234/4/AL05/SND	Respondent	Highways England	Yes		Yes	The MLP identifies existing mineral sites to be safeguarded, as well 7 new allocations and /or extensions. Of the 7 sites identified, 3 are positioned within a reasonable distance of the SRN (A417/A419), in that Highways England should be consulted on any traffic impacts identified for the SRN. These include: • Allocation 04: Land northwest of Daglingworth Quarry; • Allocation 05: Land south and west of Naunton Quarry; • Allocation 06: Land south east of Down Ampney; and • Allocation 07: Land at Lady Lamb Farm, west of Fairford; Applying the principles of paragraph 9 and 10 of Circular 02/2013, development proposals are likely to be unacceptable, by virtue of a severe impact, if they increase demand for use of a section (of the SRN) that is		The representation, which considers this matter to be 'sound', is noted.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 05: Land south and west of Naunton Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 05: Land south and west of Naunton Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						already operating at over-capacity levels, or cannot be safely accommodated. Highways England believes that MLP makes appropriate reference to the SRN and includes policies and objectives that require any new mineral site considerations to consult Highways England. These, like any new development, would be required to submit a planning application submission, with transport evidence, and if necessary mitigation, presented to support the proposals and to offset any severe development impacts identified for the SRN Highways England is of the view that the scale of mitigation likely to be required to offset development impacts in the context of the Plan, will be within the ability of site owners/operators to fund.			
1038720/69/AL05/SND	Mr Richard	Chief Executive Farmcare Trading	Yes		Yes			The representation, which considers this	No modifications are considered

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 05: Land south and west of Naunton Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 05: Land south and west of Naunton Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
	Quinn	Ltd						matter to be ‘sound’, is noted.	necessary in response to the representation.
801951/6/AL05/SND	Mrs Angela Clayton	Estates Surveyor Defence Infrastructure Organisation	Yes			On reviewing Appendix 4: Detailed development requirements for plan allocations, I can confirm the allocations 1-5 fall outside of the statutory safeguarding areas. Therefore, we have no objections to these sites being allocated.		The representation, which considers this matter to be ‘sound’, is noted.	No modifications are considered necessary in response to the representation.
1164737/69/AL05/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be ‘sound’, is noted.	No modifications are considered necessary in response to the representation.
1169771/17/AL05/SND	Mr Michael Krier	Chairman Temple Guiting Parish Council	Yes			The focus for future quarrying activities in this Plan is understandably based on Naunton (formerly Huntsman’s) Quarry. Given transport links and relatively remote location within area this is not unreasonable. As quarry expands there is a need to • monitor and control traffic movements • review noise levels and hours of working (we have early morning quarrying		The representation, which considers this matter to be ‘sound’, is noted.	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 05: Land south and west of Naunton Quarry is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 05: Land south and west of Naunton Quarry is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						noise from before 6.30 with picks, heavy machinery and trucks reversing. As site expands need to review this.			
1169920/10/AL05/COM	Mark Davies	Environment Agency					We would advise (for this and other allocations) that the Water Resources section could also cross reference to WFD in the final paragraph so it reads in line with the 'x' River Basin Management Plan and WFD catchment(s).	It is the view of the MPA that a revision to the 'Water Resources' theme of the Detailed Development Requirements in responses to comments made by the EA, would be beneficial and justified.	**Possible Modification –** **Under the 'Water Resources' theme include *"…Thames Catchment Management Plans."* in the final sentence after *"…Severn River Basin Management Plan (RBMP)…"***

Matters related to Allocation 06: Land south east of Down Ampney

Publication MLP Consultation Questionnaire Reference | Questions 71.1, 71.2, 71.3, 71.4, 71.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 06: Land south east of Down Ampney is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 06: Land south east of Down Ampney is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
854632/4/AL06/USND	Mr Saleem Shamash		No	(4) Not consistent with national policy	Yes	The section on Highways fails to specify that the developer will be subject to a requirement to make proportionate contributions in relation to wear and tear, consistent with national policy and objectives.	The section on Highways should specify that the developer will be subject to a requirement to make proportionate contributions in relation to wear and tear, consistent with national policy and objectives. I will suggest some wording in my Proof of Evidence, unless the Council now wishes to engage in dialogue to agree wording that might overcome my objection.	It is the view of the MPA that the Detailed Development Requirements for Allocation 06 are adequate to address the concern raised regarding potential condition risks to the highway network. However, it is acknowledged that a revision to the text within the 'Highways' theme would be beneficial to better inform applicants of what is expected of them.	**Possible Modification –** **Under the 'Highways' theme, remove *"and"* after *"Latton" and* add the following text to the 3rd sentence after *"…Gateway"*; *"…;and appropriate and necessary, measures to avoid undue harm to the structure of the local highway and / or to adequately provide for any highway repairs attributable to vehicular movements associated with minerals development from within the allocation."***
1164737/70/AL06/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
852999/1/AL06/USND	Mrs Gemma Ormond		No			Objections and Concerns regarding Allocation 06 Land South East of Down Ampney. 1) Loss of Amenity		It is the view of the MPA that the Detailed Development Requirements for Allocation 06,	No modifications are considered necessary in response to the representation.

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 06: Land south east of Down Ampney is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 06: Land south east of Down Ampney is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						regarding our home - impact on tranquility, rural location, visual impact and noise impact 2) Request for increased buffer strip around of our home to maintain the amenity. Request preservation of mature woodland strip deeper into proposed site to south of home and mature trees to the west. 3) Concerns about transportation of minerals from site to processing plant on existing narrow lanes 4) Concerns about transportation of infill to site - how will this be completed on the narrow lanes and without impacting the rural amenity. 5) Cumulative impact of proposed allocation alongside existing sites to the south (Whetstone Bridge, Roundhouse, Eysey) - visual impact, noise, traffic. 6) Maintenance of road access to Down Ampney from our home - disruption, closure or re-routing of this road would		combined with the remaining policy framework of the plan should adequately address the concerns put forward in the representation.	

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 06: Land south east of Down Ampney is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 06: Land south east of Down Ampney is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						cause substantial inconvenience. Route is used for commuting to work and school daily.			
1169920/11/AL06/USND	Mark Davies	Environment Agency	No	(2) Not justified (3) Not effective		SITE ALLOCATION – Down Ampney allocation 06 We have commented on this site as part of an EIA scoping response to your Council. (see attached). We have also engaged in pre-application discussion with the applicant. Some comments and suggested revisions are provided in box 5 below. SCOPING REQUEST FOR THE WINNING AND WORKING OF SAND & GRAVEL WITH ASSOCIATED WORKS - FORMER RAF DOWN AMPNEY AIRFIELD & SURROUNDING AREAS, THE NEW ROAD, DOWN AMPNEY, GLOUCESTERSHIRE, GL7 5PL Thank you for referring the above EIA Scoping consultation which was received on 23	We discussed hydrology and hydro-geological requirements as part required given the sensitivity of the aquifer at this location. This is picked up in the water resources section of your developer requirements. We provided a heads up on our position on permitting a landfill or deposit for recovery (DfR) site in a Source Protection Zone 1, including our regulatory permitting position. This will be considered subject to appropriate risk assessment etc confirming the 'proposed operation' may be acceptable. We may be in a position to grant a permit if submitted, without prejudice, subject to the necessary risk assessment(s) and appropriate protection measures but the onus would	It is the view of the MPA that revisions to the text of the 'Water resources' theme of the Detailed Development Requirements in responses to comments made by the Environment Agency, would be beneficial and justified.	**Possible Modifications –** **Under the 'Water resources' theme add the following text to the 6th sentence after *"…sensitive commercial water supplies…'*; *"…in order to demonstrate there will be no significant environmental impacts and that appropriate protection and / or mitigation and management measures will be put in place. Any landfill or deposit for recovery (DfR) activities will require an appropriate EA permit. Advice from the EA in respect of this matter should be sought at earliest opportunity and parallel tracking of the planning application with the relevant EA permit***

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 06: Land south east of Down Ampney is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 06: Land south east of Down Ampney is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						November 2017. We have reviewed the document entitled "Land at Down Ampney -Winning and Working of Sand & Gravel and Related Development - request for a Scoping Opinion" by Land and Mineral Management dated November 2017. We have the following comments and advice: Protection of Groundwater The principle effect of this proposed development on groundwater would appear to be the impact on groundwater levels in the superficial gravels aquifer and their ability to provide base flow to local streams and maintain water levels in nearby wetlands. To this end the proposal to measure water levels using piezometers and to provide the Hydrology and Hydrogeological Impact Assessment as set out in section 9 of the report should	be on the applicant to demonstrate that there will be no significant environmental impact. This could be cross referenced in the requirements for this site. From a planning perspective we confirmed that we would consider the 'proposed development', subject to an appropriate Environmental Impact Assessment (EIA), demonstrating suitable avoidance, protection and /or mitigation measures. Our planning position would be subject to the EIA confirming that the risks are avoided where possible (outside of SPZ1 – our preference), OR appropriate protection/mitigation and management measures if minimal wetland/open water (our preference for this to be maximised) is demonstrated to be necessary on balance. We appreciate this is identified as an issue in paragraph 425 of		***is strongly encouraged."*** **In addition, include:-** ***"…Thames Catchment Management Plans."*** **in the final sentence after** ***"…Severn River Basin Management Plan (RBMP)…"***

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 06: Land south east of Down Ampney is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 06: Land south east of Down Ampney is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
						be sufficient to make an assessment, assuming the level and quality of the data is acceptable. Section 3.8 refers to the permit that will be required for discharge to watercourse. We would recommend that parallel enquiries are made to the Environment Agency permitting teams to assess whether this activity will be acceptable. When considering the long term future of the site, issues that should be considered are increased evaporation rates due to the additional area of open water shown in Plan D10_LAN_005 plus any impact on these rates due to climate change. The impact of these effects will then have to be assessed on the ongoing water balance of the site. One issue not mentioned in the report is that much of the site lies within a source protection zone for a nearby	Policy MR01 (restoration…) and reference would need to be made to your existing waste core strategy policy. As mentioned elsewhere in our representations, we note that a comprehensive Water Features Survey is required and “This could identify other and / or more distant surface water bodies that are also worth assessing along with other relevant receptors”. We would advise (for this and other allocations) that the Water Resources section could also cross reference to WFD in the final paragraph so it reads in line with the ‘x’ River Basin Management Plan and WFD catchment(s).		

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						public water supply abstraction at Meysey Hampton. While we are aware that this abstraction is from aquifers confined by the overlying Oxford Clay, this issue should not be ignored. Landfilling activity proposed as part of the long term plan for the site would normally register an objection from the Environment Agency within the Inner Source Protection Zone of a Public Water Supply (see the Environment Agency's Approach to Groundwater Protection version 1.1 November 2017 Sections E & F available via: https://www.gov.uk/government/collections/groundwater-protection). Parallel discussions should be made with the Environment Agency's permitting team that the relevant landfill permits will be granted when the time arises. Ecological Protection			

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						and Enhancement We note from the scoping request document that the usual EcIA approach is proposed to be followed, which should provide the necessary information relating to determining ecological impact. As noted by the Glos CC Ecologist in his comments, sufficient information must be provided to enable a Habitats Regulations Assessment of possible impacts on North Meadow and Clattinger Farm SAC - this is likely to require hydrological monitoring and modelling, which is suggested. Fluvial Flood Risk We are pleased to see within the Scoping Report that there has been a provision made for a Flood Risk Assessment (FRA) for this development and that the hydrogeological and hydrological conditions will be assessed. There is no mention of a Sequential Test, and			

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						as the boundary of the proposed site includes both Flood Zones 2 and 3 it would be necessary to determine why this site is needed for this development. This is a role for the Planning Authority, not ourselves. There is no mention of the impacts of climate change being proposed. This will be a requirement within the FRA for the development to make sure that any development is safe from flood risk for the lifetime of the development and that third parties are not unacceptably impacted. No land raising above existing ground level has been proposed. However, where the land slopes towards the flood plain, any raising of any land to any level would need to be assessed in terms of flood risk and in the event of loss of flood plain storage, this would need to be addressed in line with the NPPF			

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						guidance. It poses a concern that no provision has been made for computer based numerical modelling. Where there are not sufficient fluvial models already available, it may be necessary to carry out suitable modelling to make sure that any works do not change flow paths or increase flood risk elsewhere. Flood modelling may therefore be necessary to satisfy any objections that might arise with regards to increased flood risk from the proposed development. Other Advice Some of the works may be subject to Environmental Permitting Regulations, such as for Flood Risk Activities and for water abstraction and infilling activities. The applicant should contact our National Permitting Team to discuss this aspect. If the applicant would like us to review any draft submissions/			

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						technical reports prior to a formal submission, outside of a statutory consultation, and/or meet to discuss the proposed development, this will be chargeable in line with our cost recovery service. If the applicant wishes to progress a meeting, or document review, we would recommend they contact our team email address at SHWGPlanning@environment-agency.gov.uk			
808023/29/AL06/SND	Mr Peter Andrew	Group Director - Quarry Products HIlls Quarry Products Ltd	Yes			Appendix 4 – Allocation 6 Down Ampney – support to footnote 297 noting there are further unallocated resources and they should not be prejudiced. Both an initial Health Impact Assessment and an Economic Impact Assessment are not requirements for the site. The assessment work which will be done will confirm that the minerals can be worked without significant adverse impact on the		It is the view of the MPA that the Detailed Development Requirements for Allocation 06 are reasonable and justified and that the matters of health and economic impact should be considered, although it is noted that it doesn't necessarily need to be a separate, standalone exercise. It is also acknowledged that the circumstances surrounding the status of the	**Possible Modifications –** **Under the 'Economic development' theme revise the 1st part of the 1st sentence so that it reads; *"An Economic Impact Assessment (EcIA) should be carried out to…"* Also, add the following additional text to the 1st part of the 2nd sentence; *"Whether a dedicated EcIA is prepared or related*

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						environment and on public amenity, therefore it is reasonable to conclude that there would not be any impact on public health or any significant negative economic impact. Burdening developers with unnecessary assessments doesn't bring forward the release f the needed resources. Should the peculiarities of a specific site warrant any such specific assessment that would be identified by the pre-application or the EIA Scoping, but it should not be a blanket requirement in mineral allocations. Under Natural Environment it notes the "re-notification" of the SSSI on CWP for overwintering birds… this hasn't happened, it is simply a proposal that NE are looking at further.		Cotswold Water SSSI should be more accurately reflected. A small number of revisions are deemed to be reasonable and justified.	***information is to be presented as part of another type of assessment, it must establish…"*** **Under the 'Natural environment' theme add the following to the beginning of the 5th sentence so that it reads; *"In the event that the Cotswold Water Park SSSI is re-notified for its breeding and overwintering bird assemblages, and assessment should be carried out to establish…"***
858234/5/AL06/SND	Respondent	Highways England	Yes		Yes	The MLP identifies existing mineral sites to be safeguarded, as well 7 new allocations and /or		The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

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						extensions. Of the 7 sites identified, 3 are positioned within a reasonable distance of the SRN (A417/A419), in that Highways England should be consulted on any traffic impacts identified for the SRN. These include: • Allocation 04: Land northwest of Daglingworth Quarry; • Allocation 05: Land south and west of Naunton Quarry; • Allocation 06: Land south east of Down Ampney; and • Allocation 07: Land at Lady Lamb Farm, west of Fairford; Applying the principles of paragraph 9 and 10 of Circular 02/2013, development proposals are likely to be unacceptable, by virtue of a severe impact, if they increase demand for use of a section (of the SRN) that is already operating at over-capacity levels, or cannot be safely accommodated. Highways England believes that MLP makes appropriate reference to the SRN			

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						and includes policies and objectives that require any new mineral site considerations to consult Highways England. These, like any new development, would be required to submit a planning application submission, with transport evidence, and if necessary mitigation, presented to support the proposals and to offset any severe development impacts identified for the SRN Highways England is of the view that the scale of mitigation likely to be required to offset development impacts in the context of the Plan, will be within the ability of site owners/operators to fund.			
1038720/70/AL06/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
801951/7/AL06/USND	Mrs Angela Clayton	Estates Surveyor Defence Infrastructure Organisation	No			With regards to Allocation 06: Down Ampney- this office previously commented on the	In summary, the MOD has safeguarding concerns with the proposed site	It is the view of the MPA that the Detailed Development Requirements will	**Possible Modifications –** **Under the 'Aerodrome**

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						scoping application regarding sand and gravel extraction for this site. The proposed restoration for this scheme includes many water bodies with islands and wet habitat. The MOD objected to the scoping application based on the restoration scheme being unsuitable due to the proximity to RAF Fairford and adding to the cumulative effect of water bodies in the area; it's potential to increase the number of large, flocking bird species which are deemed hazardous to air craft safety, as well as increasing flight lines across the airfield	allocations 6 & 7 the restoration and aftercare is a key consideration with regards to aviation safety. Therefore, with regards to birdstrike safeguarding the MOD would recommend dry phased working and dry restoration schemes.	ensure the risk of bird hazard will be effectively managed through the need for sufficient evidence from applicants and specific early consultation with the Defence Infrastructure Organisation (DIO). However, it is acknowledged that revisions would be justified to assist future applicants in their consideration of bird hazard risk and to confirm the current strategic view held by DIO.	**Safeguarding' theme, make the following changes:- In the 4th sentence, replace *"Particularly"* with *"Particular"* and after *"…within.."* delete *"a"* and also revise the remainder of the sentence so that it reads: *"…statutory safeguarding aerodrome height, technical and birdstrike safeguarding consultation zones and an area where instrumental Landing Systems (ILS) may need to operate "* Also, add a new 6th sentence; *"Consultation with the DIO will be required if any equipment is proposed that exceeds 15.2 metres in height above ground level."* In addition, revise the last sentence after *"…bird hazard risk*s…" so that it reads; *"…to an acceptable level and that effective monitoring of their success over time,***

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									including post-mineral working, restoration and aftercare, should form a major element of the BHMS. **Under 'Restoration opportunities and constraints' theme, within the 5th sentence after *"…RAF Fairford"* add the additional text *"…and / or other nearby aerodromes."* Also, insert a new 6th sentence that reads; "*This may significantly restrict opportunities to achieve wet restoration, particularly involving the introduction of open water bodies."***
7936416/AL06/COM	Mr Rohan Torkildsen	South West Region Historic England				Historic England notes the proposed allocation and subsequent works may affect the significance of a number of heritage assets, as set out in the evidence base and SA.	It will be important to recognise that the findings of the (required) further detailed heritage assessment may result in measures and limitations on extraction to avoid or minimise harm to acceptable degree in accordance with the requirements of MLP DM08 and national	The MPA acknowledge the comments provided and consider it justified to make a revision to the Detailed Development Requirements to clarify for applicants the potential of the need for restrictive measures to be applied.	**Possible Modification –** **Under the 'Historic environment – including archaeology' theme after the 3rd sentence, add a new 4th sentence that reads; *"This could include limitations on operations***

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							planning policy.		***including the working of minerals."***

Matters related to Allocation 07: Land at Lady Lamb Farm, west of Fairford

Publication MLP Consultation Reference | Questions 72.1, 72.2, 72.3, 72.4, 72.5

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 07: Land at Lady Lamb Farm, west of Fairford is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 07: Land at Lady Lamb Farm, west of Fairford is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
1164737/71/AL07/SND	Mr Matthew Cuthbert	Assistant Estates Surveyor Aggregate Industries	Yes		Yes	Not applicable.	Not applicable.	The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
1169920/12/AL07/COM	Mark Davies	Environment Agency					Our comments on site allocations also mention the recommendation of text for "maintaining or improvement in water quality to meet WFD objectives in the site allocations text, where it says "contribute towards protecting and improving the water environment in line with…" We would advise (for this and other allocations) that the Water Resources section could also cross reference to WFD in the final paragraph so it reads in line with the 'x' River Basin Management Plan and WFD catchment(s).	It is the view of the MPA that a revision to the 'Water Resources' theme of the Detailed Development Requirements in responses to comments made by the Environment Agency, would be beneficial and justified.	**Possible Modification –** **Under the 'Water Resources' theme include:-** ***"…Thames Catchment Management Plans."*** **in the final sentence after** ***"…Severn River Basin Management Plan (RBMP)…"***
858234/6/AL07/SND	Respondent	Highways England	Yes		Yes	The MLP identifies existing mineral sites to be safeguarded, as well 7 new allocations and /or		The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.

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						extensions. Of the 7 sites identified, 3 are positioned within a reasonable distance of the SRN (A417/A419), in that Highways England should be consulted on any traffic impacts identified for the SRN. These include: • Allocation 04: Land northwest of Daglingworth Quarry; • Allocation 05: Land south and west of Naunton Quarry; • Allocation 06: Land south east of Down Ampney; and • Allocation 07: Land at Lady Lamb Farm, west of Fairford; Applying the principles of paragraph 9 and 10 of Circular 02/2013, development proposals are likely to be unacceptable, by virtue of a severe impact, if they increase demand for use of a section (of the SRN) that is already operating at over-capacity levels, or cannot be safely accommodated. Highways England believes that MLP makes appropriate reference to the SRN and includes policies			

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						and objectives that require any new mineral site considerations to consult Highways England. These, like any new development, would be required to submit a planning application submission, with transport evidence, and if necessary mitigation, presented to support the proposals and to offset any severe development impacts identified for the SRN. Highways England is of the view that the scale of mitigation likely to be required to offset development impacts in the context of the Plan, will be within the ability of site owners/operators to fund.			
1038720/71/AL07/SND	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes		Yes			The representation, which considers this matter to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
801951/8/AL07/USND	Mrs Angela Clayton	Estates Surveyor Defence Infrastructure Organisation	No			Allocation 07: Land at Lady Lamb Farm – this site lies 2.63km north from the centre of the main runway for RAF Fairford, it occupies	In summary, the MOD has safeguarding concerns with the proposed site allocations 6 & 7 the restoration and	It is the view of the MPA that the Detailed Development Requirements will ensure the risk of bird hazard will be	**Possible Modifications –** **Under the 'Aerodrome Safeguarding' theme, make the**

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						the 15.2m safeguarding aerodrome height, technical and birdstrike safeguarding consultation zones. Therefore, if the site were to use any equipment which exceeded 15.2m agl we would need to be consulted with regards to aerodrome height/technical safeguarding. As identified within my assessment the MOD has concerns with regards to wet restoration schemes and the creation of open water bodies.	aftercare is a key consideration with regards to aviation safety. Therefore, with regards to birdstrike safeguarding the MOD would recommend dry phased working and dry restoration schemes.	effectively managed through the need for sufficient evidence from applicants and specific early consultation with the Defence Infrastructure Organisation (DIO). However, it is acknowledged that revisions would be justified to assist future applicants in their consideration of bird hazard risk and to confirm the current strategic view held by DIO.	**following changes:- In the 4th sentence, replace *"Particularly"* with *"Particular"* and after *"…within.."* delete *"a"* and also revise the remainder of the sentence so that it reads: *"…statutory safeguarding aerodrome height, technical and birdstrike safeguarding consultation zones and an area where instrumental Landing Systems (ILS) may need to operate "* Also, add a new 6th sentence; *"Consultation with the DIO will be required if any equipment is proposed that exceeds 15.2 metres in height above ground level."* In addition, revise the last sentence after *"…bird hazard risk*s…" so that it reads; *"…to an acceptable level and that effective monitoring of their success over time, including post-mineral working, restoration and*

Representation Reference	Full Name	Organisation Details	Do you consider that the Appendix 4: Allocation 07: Land at Lady Lamb Farm, west of Fairford is sound?	If No, do you consider it is unsound because it is:	Do you consider that the Appendix 4: Allocation 07: Land at Lady Lamb Farm, west of Fairford is legally compliant?	Please give details in the box below of why you consider the document is not legally compliant, is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the document, please also use this box to set out your comments.	What change(s) do you consider necessary to make the document legally compliant or sound? It will be helpful if you are able to put forward your suggested revised wording or any policy or text. Please be as precise as possible.	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
									aftercare, should form a major element of the BHMS. **Under 'Restoration opportunities and constraints' theme, within the 5th sentence after *"…RAF Fairford"* add the additional text *"…and / or other nearby aerodromes."* Also, insert a new 6th sentence that reads; "*This may significantly restrict opportunities to achieve wet restoration, particularly involving the introduction of open water bodies."***

Matters related to all other general issues raised by the consultation

Publication MLP Consultation Questionnaire Reference | Questions 73.1, 73.2

Representation Reference	Full Name	Organisation Details	Do you have "no comments" to make regarding the content of the Gloucestershire Minerals Local Plan Publication Version (Regulation 19)?	If No, and you have a general point(s) to raise that are not applicable elsewhere in the questionnaire, please use this box to set out your comments	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
852905/1/OTH/COM	Mr Chris Vickery	Cotswold District Council	Yes	CDC Officers are generally supportive of the Regulation 19 Minerals Local Plan and do not wish to raise any objections to its contents.	The representation, which considers the plan as a whole to be 'sound', is noted.	No modifications are considered necessary in response to the representation.
852999/2/OTH/COM	Mrs Gemma Ormond		No		The MPA note the comment made.	No modifications are considered necessary in response to the representation.
1169771/18/OTH/COM	Mr Michael Krier	Chairman Temple Guiting Parish Council	Yes	Minerals Plan: Document Review July 2018 Temple Guiting Parish Council's response to Local Minerals Plan Consultation General The Plan represents a significant amount of work over many years and the pulling the documentation together into a consolidated repository; this is welcomed. Application The Plan would benefit from a clarification statement on the status of the plan and it's application to existing quarries; extension of existing sites and new applications. Paragraph 6 states " will replace and update all aspects" of the current plan and provides a clear framework for how mineral developments should take place across Gloucestershire. Quarrying is a part of our landscape and plays a key part in providing materials for maintaining the character of our area and is a key source of employment. However we need to manage the level of activity and preserve the AONB. However; little or no reference is made to the other quarries in our Parish:	The MPA acknowledge and note the comments made. With regard to the status of existing quarries, the MLP will provide a policy framework for assessing future minerals development proposals It has no retrospective powers to tackle issues, which may have arisen from extant permissions. However, any new proposals coming forward on existing minerals sites whether they are for new extensions or to vary existing conditions will need to be assessed against the policy framework within the plan. It is recognised that there are a significant number of quarry operations within and adjacent to Temple Guiting parish which is also located within the Cotswolds AONB. Publication Policy DM02 Cumulative Impact is specifically designed to address circumstances where a new proposal comes forward in an area where mineral working could or has become intensified. Furthermore, there are strict tests within both the building stone policy MW02 and Landscape policy DM09 which will ensure that an appropriate balance is made between economic value of the proposal, the overriding need	No modifications to the MLP are considered necessary in response to the representation. However, a section will be included within the evidence paper to address mineral working within the AONB.

Representation Reference	Full Name	Organisation Details	Do you have "no comments" to make regarding the content of the Gloucestershire Minerals Local Plan Publication Version (Regulation 19)?	If No, and you have a general point(s) to raise that are not applicable elsewhere in the questionnaire, please use this box to set out your comments	Draft GCC officer response	Possible modifications to Publication MLP under consideration by GCC (officer-level as at Aug / Sept 2018)
				• Oathill (Recent permission to extend working and extraction rate) • Tinkers Barn • Cotswold Hills at Ford (Recent application to extend importation) • Three Gates at Ford In 2017 a scoping application for a major new quarry at Norman's Field at Temple Guiting 2017 was received by GCC. There are also quarries in neighbouring Parishes of Guiting Power and Naunton that impact our Parish. The Parish Council and local residents are fearful of further deterioration in local amenity from extensive quarrying in a small area within the AONB. Given the impact of these on our environment this seems to be a significant omission, as is the fact that we have recently received three major applications for new quarries or extensions of existing quarries. Given the new Minerals Plan how will other local quarrying activities be covered? Whilst the Plan states that "some aggregate working is allowable but is strictly controlled" at Oathill the recent failures to control the amount of aggregate and stone produced raises questions on the validity of this statement and the ability to "control" future works. It is also of note that whilst the Plan makes reference to quarrying for building stone it is difficult to reconcile how this then fits with export of stone for gardens in other countries and the major concrete production facilities at Naunton Quarry. This use of quarries for exporting building stone	for the mineral and the need to protect the special qualities of the AONB all of which carrying great weight within national policy. The MPA aims to enhance the supporting evidence for the plan to articulate the particular local circumstances surrounding the history of mineral working and the county's AONBs.	

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				outside of the AONB and major industrialisation of sites does not seem to be consistent with the stated objectives. It is our view that a clearer statement in the Policy is needed regarding new applications and modification of existing permissions. The comments provided by Mr Drake Strategic Infrastructure Minerals and Waste Policy to Councillor Nigel Moor dated 03 July 2018 would greatly assist the user of the policy of the wider intent and application.		
794035/6/OTH/COM	Mr Dale Moss	Northcot Brick Ltd		We are submitting representations in support of the draft Minerals Local Plan which supports an existing mineral site and allows for new minerals development to meet local and national requirements. The draft Minerals Local Plan is in accordance with national planning policy and is considered to be sound and legally compliant.	The representation, which considers the plan as a whole to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
810002/5/OTH/COM	Respondent	Welsh Water		General Comment - Do you consider the document is sound - Yes Do you consider the document complies with the legal/procedural requirements for preparing a development plan - Yes	The representation, which considers the plan as a whole to be 'sound' and 'legally compliant', is noted.	No modifications are considered necessary in response to the representation.
803161/1/OTH/COM	Respondent	National Grid Plant Protection	Yes	No comments to make	Comments noted.	No modifications are considered necessary in response to the representation.
1038720/72/OTH/COM	Mr Richard Quinn	Chief Executive Farmcare Trading Ltd	Yes	The proposals set out in the consultation include extraction from the land south east of Down Ampney, which is a Farmcare asset. We are broadly supportive of the plans as they stand, we will be undertaking further engagement with the local	The representation, which shows broad support for the plan, is noted. The commitment to undertake pre-application engagement with the local community and the DIO is welcomed. The mineral planning authority is intending to submit the MLP	No modifications are considered necessary in response to the representation.

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				community to ensure that the plans are workable when they are implemented and have been extensively engaged with the DIO regarding BHMS and the threat of bird strike. There will clearly be a requirement to demonstrate the impact of any potential mineral development, but given that this site is of economic and strategic importance to the county reserves, there should be positive engagement to move plans forward.	within a reasonable timeframe following the publication under Regulation 19. However, once the plan has been submitted under Regulation 22 the MPA has very little control over the timescales.	
793641/7/OTH/COM	Mr Rohan Torkildsen	South West Region Historic England		Whole document and appendicies – Several references made to English Heritage, Replace with reference to Historic England	Comment is noted.	No modifications are considered necessary in response to the representation.
1034555/1/OTH/COM	Maxine Smillie		No	For the last 2 years the plan has crashed along, concerned about its effectiveness of the process from which the plan has been collated.	Comments noted. The plan has been prepared in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012 and the National Planning Policy Framework.	No modifications are considered necessary in response to the representation.