



## HABITATS REGULATIONS ASSESSMENT (HRA) REVIEW OF THE MAIN MODIFICATIONS OF THE MINERALS LOCAL PLAN FOR GLOUCESTERSHIRE 2018 - 2032

### 1.1 INTRODUCTION

In accordance with European Directive 92/43/EEC Article 6(3) and Article 6(4) transposed into UK law by the Conservation of Habitats Species Regulations<sup>1</sup>, it is necessary for Gloucestershire County Council in preparing and finalising the Minerals Local Plan for Gloucestershire 2018 - 2032 to consider any potential impacts that might arise on European or Natura 2000 sites<sup>2</sup> and Ramsar sites<sup>3</sup>, referred to as 'International / European Sites' in this addendum. This is required to ensure that an adopted Minerals Local Plan for Gloucestershire 2018 - 2032 would result in likely significant effects on International / European sites and the overall Natura network.

The HRA Main Report (March 2018<sup>4</sup>) was produced to review all aspects particularly the policies and strategic sites for the submission version of the Minerals Local Plan for Gloucestershire 2018 - 2032. This report concluded that no likely significant effect on any International/European Site could occur. **The purpose of this addendum is to review the main modifications of the Minerals Local Plan for Gloucestershire 2018 – 2032 to see if they might change existing HRA conclusions.**

The following section of this HRA addendum reviews the major changes to the Minerals Local Plan for Gloucestershire 2018 - 2032 as are to be presented at the Modifications Consultation stage (Summer 2019).

<sup>1</sup> Also known as the Habitats Regulations 2017 (as amended)

<sup>2</sup> In May 1992 European Union governments adopted legislation designed to protect the most seriously threatened habitats and species across Europe. This legislation is called the Habitats Directive and complements the Birds Directive adopted in 1979. At the heart of both these Directives is the creation of a network of sites called Natura 2000. The Birds Directive requires the establishment of Special Protection Areas (SPAs) for birds. The Habitats Directive similarly requires Special Areas of Conservation (SACs) to be designated for other species, and for habitats. Together, SPAs and SACs make up the Natura 2000 series.

<sup>3</sup> Ramsar sites are wetland sites of international importance designated under the Ramsar Convention, signed in Ramsar, Iran, in 1971. It is Government policy that Ramsar sites are also treated as if they are European designated sites in accordance with the Habitats Directive.

<sup>4</sup> To be found currently at <https://www.goucestershire.gov.uk/planning-and-environment/planning-policy/minerals-local-plan-for-goucestershire/evidence-base-for-the-minerals-local-plan-for-goucestershire/>

## **1.2 CONSIDERATION OF MAIN MODIFICATIONS TO THE MINERALS LOCAL PLAN FOR GLOUCESTERSHIRE 2018 - 2032**

*Table 1* includes a summary of the Minerals Local Plan for Gloucestershire 2018 – 2032 main modifications and considers them against the existing HRA (Main Report<sup>5</sup>) conclusions. Comment has been included to reveal the outcome of this and whether legal compliance will be maintained in using these main modifications.

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<sup>5</sup> To be found currently at <https://www.goucestershire.gov.uk/planning-and-environment/planning-policy/minerals-local-plan-for-goucestershire/evidence-base-for-the-minerals-local-plan-for-goucestershire/>

**Table 1 HRA Review of the Minerals Local Plan for Gloucestershire 2018 - 2032 Main Modifications<sup>6</sup>**

<b>MM Reference</b> (former reference used in Examination document EX5a – Proposed Modifications)	<b>Origin of MM within MLP</b> (paragraph and / or policy location and page no.)	<b>Main Modifications (MMs) brought forward by GCC</b>	<b>HRA Review of Main Modification Outcome</b>
<b>MM   01</b> (New proposed modification)	Introduction (paragraph 13, page 4)	<p>Revise Publication MLP paragraph 13: -</p> <p>Minerals of economic value in Gloucestershire that are presently worked and / or could be in the foreseeable future include: - clay; coal; limestone; sand &amp; gravel (<b><u>including sharp and soft sands</u></b>); and sandstone. These minerals are mostly found at or near the surface and are concentrated in four main resource areas – the Cotswolds; Forest of Dean; Seven Vale; and the Upper Thames Valley. Coal is present underground, although at relatively shallow depths within the Forest of Dean resource area.</p>	<i>Qualification that does not affect the HRA Main Report conclusions.</i>
<b>MM   02</b> (New proposed modification)	The Strategy (page 26)	<p>Revise the Publication MLP Strategy: -</p> <p><b>Secondary &amp; recycled aggregate supplies (see section 6)</b></p> <p>To <b><u>make provision for the supply of secondary and recycled aggregates and</u></b> support local decision makers in giving weight to the planning merits of increasing the use of recycled and secondary aggregates <b><u>in development</u></b> as an alternative to primary land-won aggregates.</p>	<i>MLP Strategy confirmations that do not affect the HRA Main Report conclusions.</i>
<b>MM   03</b> (New proposed modification)	The Strategy (page 27)	<p>Revise the Publication MLP Strategy: -</p> <p><b>The future supply of minerals (see section 8) and Areas for future aggregate working (see section 9)</b></p> <p>To make provision for the steady and adequate supply of <b><u>nationally important minerals found locally including aggregates made up of crushed rock, sharp and soft sands and gravel; secondary and recycled aggregates; and the industrial mineral brick clays key local minerals</u></b> (clay, brick clay and aggregates throughout the plan period and beyond where necessary, which will contribute towards meeting identified <b><u>local, sub-national and national</u></b> needs as advised appropriately through the monitoring of relevant landbanks of permitted reserves;</p>	<i>MLP Strategy clarifications that do not affect the HRA Main Report conclusions.</i>

<sup>6</sup> Note: This Table includes the Draft Proposed Main Modifications (MMs) to the Publication Minerals Local Plan for Gloucestershire (2018 – 2032) following the MLP examination hearing sessions that took place on the 11th and 12th June 2019. Proposed deletions are ~~strikethrough~~ and additional text is **bold and underlined**.

Each MM has been afforded a unique identifying reference and has also been referenced back to the relevant paragraph, strategic objective or policy from the Publication Minerals Local Plan for Gloucestershire (2018 – 2032). Where the MM refers to an earlier presentation, this relates to Proposed Main Modifications (Examination document EX5a) and new Proposed Main Modifications are those following the MLP examination hearing sessions.

MM Reference (former reference used in Examination document EX5a – Proposed Modifications)	Origin of MM within MLP (paragraph and / or policy location and page no.)	Main Modifications (MMs) brought forward by GCC	HRA Review of Main Modification Outcome
		<p>To provide for the future working of aggregates <u>principally</u> from within allocated areas located in the Forest of Dean, Cotswold and Upper Thames Valley resource areas, <u>but acknowledging that some aggregates may also be sourced from outside of allocated areas under certain circumstances.</u> Aggregate working outside of allocated areas will only be allowed in certain circumstances;</p> <p>To make provision for the supply of <u>important and valuable</u> local natural building stones, which <u>will contribute towards maintaining the maintenance of Gloucestershire's historic built environment, heritage assets further afield and the promotion of local distinctiveness through the design of in-new build development design;</u></p>	
MM   04 (New proposed modification)	The Strategy (pages 27 and 28)	<p>Revise the Publication MLP Strategy: -</p> <p>Development management (see section 10)</p> <p>To <u>support actions for tackling and responding to climate change and to</u> ensure that the natural (including water) and historic environment, health, wellbeing and quality of life of local communities, the efficient, effective and safe functions of the highway network, and the economic <u>prosperity of Gloucestershire</u> viability of local businesses, will not suffer unacceptable adverse impacts caused by mineral developments, through: -</p> <ul style="list-style-type: none"> <li>• demanding that all proposals set out sufficiently detailed and evidenced appraisals of potential adverse impacts <u>including making reasonable allowances for the impacts of climate change</u>, their possible significance and a clear demonstration of how these could be avoided or that effective mitigation measures will be employed;</li> <li>• giving prominence to the potential risk of cumulative impacts through either multiple impacts from a single mineral development or a number of mineral developments clustered within one of Gloucestershire's mineral resource areas or another equivalent resource area within a neighbouring local authority area;</li> <li>• <u>pursuing actions that contribute towards decarbonising the economy and minimising greenhouse gas emissions by requiring: - increasingly efficient mineral operations that will achieve a reduction in journey frequency and the distance travelled by minerals, the use where practicable of alternative and more sustainable modes of non-road based transport and / or haulage vehicles that use increasingly reduced emissions technology or are able to employ more sustainable alternatives to the internal combustion engine; and</u></li> <li>• seeking to avoid, wherever possible, future working of aggregate minerals from within AONB designations or where the setting of such designations might be affected. <u>But</u></li> </ul>	<i>Environmentally positive and clarifying changes to the MLP Strategy which do not affect the HRA Main Report conclusions.</i>

<b>MM Reference</b> (former reference used in Examination document EX5a – Proposed Modifications)	<b>Origin of MM within MLP</b> (paragraph and / or policy location and page no.)	<b>Main Modifications (MMs) brought forward by GCC</b>	<b>HRA Review of Main Modification Outcome</b>
		<p><b>However</b>, where <u>mineral</u> working is justified and allowed, an appropriate balance will be achieved that is reflective of the <u>importance of the mineral resource</u> <u>reasonableness of these areas to contribute towards key aggregate and other</u> mineral supplies <u>such as natural building stones</u>, having given great importance to the protection of landscape quality, scenic beauty, cultural heritage and wildlife conservation.</p>	
<b>MM   05</b> (New proposed modification)	The Strategy (page 28)	<p>Revise the Publication MLP Strategy: -</p> <p>Mineral restoration (see section 11)</p> <p>To make certain that the 'temporary nature' of minerals development is upheld and that opportunities to maximise beneficial after uses are realised by: -</p> <ul style="list-style-type: none"> <li>requesting appropriately detailed reclamation site plans that demonstrate how effective, progressive restoration will be achieved to a high environmental standard and in the shortest possible timescale to the effect of ensuring the minimum amount of disturbance occurs; and</li> <li>positively encouraging restoration that contributes towards the achievement of sustainable development, which will not limit the range of potential acceptable after-uses and that, will secure long lasting community and environmental benefits particularly in terms of biodiversity, geological conservation interest, resilience to and adaptation to climate change, <u>contributing towards minimising the carbon footprint of mineral activities through increasing vegetation and / or open water bodies</u> and where appropriate, the reinstatement of soil resources including to the highest possible achievable grade of best and most versatile agricultural land.</li> </ul>	<i>Environmentally positive and clarifying changes to the MLP Strategy which do not affect the HRA Main Report conclusions.</i>
<b>MM   06</b> (New proposed modification)	Policy SR01 (page 30)	<p>Revise Publication MLP Policy SR01:-</p> <p><b>Part a   Mineral developments</b></p> <p><b>Mineral development proposals will be permitted where they adopt best practice in the extraction, processing and transportation of primary minerals in order to minimise the amount of waste generated and make provision for the sustainable production of secondary and recycled aggregates, subject to the requirements to policy MW06   Ancillary minerals development.</b></p> <p><b>Part b   Non-mineral developments</b></p>	<i>Environmentally positive and clarifying changes to the Policy which do not affect the HRA Main Report conclusions.</i>

MM Reference (former reference used in Examination document EX5a – Proposed Modifications)	Origin of MM within MLP (paragraph and / or policy location and page no.)	Main Modifications (MMs) brought forward by GCC	HRA Review of Main Modification Outcome
		<p>Non-mineral developments <u>proposals will be permitted where they adopt sustainable design principles, construction methods and procurement policies that are in line with the adopted Gloucestershire Waste Core Strategy Policy WCS 2: Waste reduction. This includes using the minimal amount of primary minerals; reusing or facilitating the recycling of mineral wastes generated on-site and using alternative construction materials sourced from</u> should use secondary and recycled aggregates in preference to primary aggregates wherever reasonable and practicable to do so.</p> <p>Major non-mineral developments should maximise the use of secondary and recycled aggregates including building products made from these materials, and demonstrate this through supporting evidence.</p> <p><b><u>Part c   Non-mineral developments involving the production of secondary aggregates</u></b></p> <p><u>Non-minerals development proposals involving the production of secondary aggregates will be permitted subject to such operations meeting the applicable requirements of other local development plan policies such as those concerned with amenity protection and environmental acceptability.</u></p>	
MM   07 (New proposed modification)	Supporting text to Policy SR01 (paragraph 89, page 30)	<p>Revise Publication MLP paragraph 89:-</p> <p>The aim of policy SR01 is to <u>support measures that will achieve the best use of primary minerals and to facilitate increased availability and use of alternative secondary and recycled aggregates in development throughout Gloucestershire. This will contribute towards achieving increasingly sustainable local mineral supplies.</u> increase awareness of and to encourage greater uptake of recycled and secondary aggregates within new development. In turn this may help stimulate local markets in favour of alternatives to primary land won aggregates. A stimulated local market may also generate a more attractive investment environment that could further enhance alternative aggregate supplies over time through more efficient and effective infrastructure and product innovation.</p>	<i>Environmentally positive and clarifying changes to the Policy supporting text which do not affect the HRA Main Report conclusions.</i>
MM   08 (New proposed modification)	Supporting text to Policy SR01 (paragraph 90, page 30)	<p>Revise Publication MLP paragraph 90:-</p> <p><u>All non-minerals development should use as much secondary and recycled aggregates as possible within reasonable construction and design quality constraints, environment limits and where potential impacts on local communities are not made worse.</u></p>	<i>Environmentally positive and clarifying changes to the Policy supporting text which do not affect the HRA Main Report conclusions.</i>

MM Reference (former reference used in Examination document EX5a – Proposed Modifications)	Origin of MM within MLP (paragraph and / or policy location and page no.)	Main Modifications (MMs) brought forward by GCC	HRA Review of Main Modification Outcome
		<p><u>In recognition of potential synergies between mineral working and inert recycling operations, due consideration should be given to the possibility of secondary and recycled aggregates production derived from inert waste taking place at mineral development sites. However, such proposals must not prejudice the delivery of permitted mineral working incorporating previously agreed restoration plans and avoid generating unacceptable adverse impacts on the environment and amenity of surrounding local communities. The acceptability of any secondary and recycled aggregate production at mineral development sites will need to meet the relevant criteria set out in policy MW06   Ancillary minerals development.</u></p>	
MM   09 (New proposed modification)	Supporting text to Policy SR01 (paragraph 91, page 30)	<p>Revise Publication MLP paragraph 91:-</p> <p>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. A focus on major development offers an opportunity to achieve meaningful change by way of economies of scale. It also enables an effective means of monitoring policy SR01.</p> <p><u>Non-mineral development proposals brought forward throughout Gloucestershire over the coming years will need to demonstrate their sustainable credentials in order to meet local development plan requirements. This includes adherence to the principles of waste minimisation, the re-use of materials and the adoption of high sustainable construction standards. The adopted Gloucestershire Waste Core Strategy Policy WCS 2   Waste Reduction requires the submission of a Waste Minimisation Statement (WMS) that demands the monitoring of waste generated during construction (including minerals where they have been used), and the demonstration of how construction and demolition waste materials may be re-used on-site or will be recycled for later use off-site.</u></p>	<i>Environmentally positive and clarifying changes to the Policy supporting text which do not affect the HRA Main Report conclusions.</i>
MM   10 (New proposed modification)	Supporting text to Policy SR01 (paragraph 92, pages 30 and 31)	<p>Revise Publication MLP paragraph 92:-</p> <p>92. The definition of major development is set out in planning regulations and this should equally apply to major non-minerals development. It involves 10 dwellings or more, or a site for housing of over 0.5 hectares; and for all other development types, any building that creates floor space of 1,000m<sup>2</sup> or more, or will be carried out on a site of 1 hectare or more.</p> <p><u>In relation to construction materials used in non-minerals development proposals, there are adopted local plan policies that seek the achievement of high sustainable construction standards, including some support for exceeding the minimum requirements under the building control framework. This could be achieved through meeting the Building Research Establishment Environmental Assessment Method (BREEAM) technical standards, which</u></p>	<i>Environmentally positive and clarifying changes to the Policy supporting text which do not affect the HRA Main Report conclusions.</i>

MM Reference (former reference used in Examination document EX5a – Proposed Modifications)	Origin of MM within MLP (paragraph and / or policy location and page no.)	Main Modifications (MMs) brought forward by GCC	HRA Review of Main Modification Outcome
		<p><u>includes demonstrating material efficiency through the procurement of materials with high levels of recycled content</u> <small>[retain footnote 50]</small> <u>or securing credits towards Leadership in Energy and Environmental Design (LEED) certification by way of using materials that include a recycled element.</u> In addition, the adopted Gloucestershire Waste Minimisation in Development Projects Supplementary Planning Document (WM-SPD) which supports Policy WCS 2 contains a target of 10% (by value) for major development to be constructed from materials derived from recycled and sustainable sources.</p>	
MM   11 (New proposed modification)	Supporting text to Policy SR01 (paragraph 93, page 31)	<p>Revise Publication MLP paragraph 93:-</p> <p>93. Collaboration between the MPA and local planning authorities will be essential to achieve desirable increases in the demand and subsequent use of secondary and recycled aggregates. Local planning authorities will largely be responsible for determining accordance with policy SR01, but may seek advice from the MPA from time to time to ensure the realistic deliverability of proposals through confirmation of proposed sources and uses of secondary and recycled aggregates.</p> <p><u>The MPA will work closely with Gloucestershire's local planning authorities to support the implementation of local development plan policy requirements relating to matters of waste reduction, reuse and sustainable construction, specifically where this relates to mineral matters. The MPA may advise decision makers in response to any applicants' analysis of availability and possible sources of local alternative secondary and recycled aggregates</u> <small>[retain footnote 46]</small> <u>. This is alongside a review of evidence provided by applicants on meeting the principles of waste minimisation, which has been available from the County Council in its capacity as Waste Planning Authority (WPA) since the adoption of the Gloucestershire Waste Core Strategy in 2012.</u></p>	<p><i>Environmentally positive and clarifying changes to the Policy supporting text which do not affect the HRA Main Report conclusions.</i></p>
MM   12 (New proposed modification)	Supporting text to Policy SR01 (paragraph 94, page 31)	<p>Revise Publication MLP paragraph 94:-</p> <p>94. For major non-minerals development proposals, consideration will need to be given to the arrangements put in place to assess and monitor materials used in the construction phase of the development. This should include scoping the potential use of secondary and recycled aggregates to determine what is realistic, and practicably achievable. Availability, viability and technical suitability are all valid matters that should be reviewed. This scoping exercise could be secured through a pre-commencement condition.</p> <p><u>For non-mineral development proposals that could involve the production of secondary aggregates, permission should be granted subject to all relevant site-specific matters such as</u></p>	<p><i>Environmentally positive and clarifying changes to the Policy supporting text which do not affect the HRA Main Report conclusions.</i></p>

MM Reference (former reference used in Examination document EX5a – Proposed Modifications)	Origin of MM within MLP (paragraph and / or policy location and page no.)	Main Modifications (MMs) brought forward by GCC	HRA Review of Main Modification Outcome
		<p><u>protecting the amenity of local communities and safeguarding the environment are appropriately addressed. Decision makers must consider the wider benefits of supporting the supply of an alternative construction material to primary minerals against the implications of any intensification of development that could result from the production of secondary aggregates such as increased highway movements.</u></p>	
MM   13 (New proposed modification)	Supporting text to Policy SR01 (paragraph 95 to 98, pages 31 and 32)	<p>Delete paragraphs 95 to 98:-</p> <p>95. The adopted Gloucestershire Waste Minimisation in Development Projects Supplementary Planning Document (WM SPD) contains a target of 10% (by value) for major development to be constructed from materials derived from recycled and sustainable sources<sup>47</sup>. The use of secondary and recycled aggregate as advocated by policy SR01 could make an invaluable contribution to the achievement of this target. It is important to note that major non-minerals development proposals that fall short of this target should be required to present a robust justification for doing so.</p> <p>96. The content of the WM SPD may be subject to a review over the time horizon of the plan. As such any new target(s) put forward covering recycled and / or sustainable materials in construction, will need to be taken into account.</p> <p>97. In the majority of instances, evidence needed to support policy SR01 will relate to other local development plan policy requirements for major non-minerals development in Gloucestershire. The use of recycled aggregate is also actively encouraged under both waste reduction and sustainable construction policies<sup>48</sup>. For example, Adopted Waste Core Strategy Policy WCS 2 (Waste Reduction) requires the submission of a Waste Minimisation Statement (WMS) that includes a requirement to monitor and measure waste generated during construction, and to show how its re-use on / or off site will be encouraged. Adopted Gloucester-Cheltenham-Tewkesbury Joint Core Strategy policy SD3 (Sustainable Design and Construction) also contains an expectation that development will incorporate the principles of waste minimisation and re-use. The policy's supporting text goes on to explain that higher standards for sustainable construction than those required through the building control framework will be encouraged. This could be achieved by meeting or exceeding the Building Research Establishment Environmental Assessment Method (BREEAM) technical standards. These include demonstrating material efficiency through evidence of the procurement of materials with high levels of recycled content.</p> <p>98. To avoid unnecessary duplication and excessive and overly burdensome information it would</p>	<p><i>Deletion that does not affect the HRA Main Report conclusions.</i></p>

<b>MM Reference</b> (former reference used in Examination document EX5a – Proposed Modifications)	<b>Origin of MM within MLP</b> (paragraph and / or policy location and page no.)	<b>Main Modifications (MMs) brought forward by GCC</b>	<b>HRA Review of Main Modification Outcome</b>
		be wholly appropriate for matters relating to policy SR01 to be incorporated with other evidential requirements for major non-minerals development. For example an expanded WMS or an addendum to a submission report tasked with demonstrating how sustainable construction and design standards are to be met.	
<b>MM   14</b> (New proposed modification)	Supporting text to Policy SR01 (paragraph 99, page 32)	<p>Revise Publication MLP paragraph 99:-</p> <p><b><u>Non-mineral developments that provide for a supply of recycled aggregates</u></b> Infrastructure matters related to the supply of secondary and recycled aggregates are dealt with through other local development plan policies covering the county. The policies contained within the adopted Gloucestershire Waste Core Strategy (WCS) are more likely to be of key importance. New, expanded or maintained recycled aggregate sources will largely be influenced by the successful implementation of Core Policy WCS 4, which is concerned with inert waste recycling &amp; recovery, and Core Policy WCS 11 that deals with the safeguarding of sites for waste management.</p>	<i>Text change that does not affect the HRA Main Report conclusions.</i>
<b>MM   15</b> (New proposed modification)	Supporting text to Policy MS01 (paragraph 102, page 33)	<p>Revise Publication MLP paragraph 102: -</p> <p>Mineral safeguarding is the means available to avoid the needless sterilisation of primary mineral resources by non-minerals developments. National policy and practice guidance advises this can be achieved through defining Mineral Safeguarding Areas (MSAs), which identify the location of specific minerals of local and national importance and an appropriate policy framework to assess the significance of the matter and <u>to</u> consider mitigation where appropriate. <b><u>This approach accords the 'agent of change' planning principle that is laid down in national policy through the revised NPPF 2018</u></b> <small>[new footnote]</small>.</p> <p>New footnote <b><u>National Planning Policy Framework (NPPF) 2018, paragraph 182</u></b></p>	<i>An addition/clarification that describes accordance with the revised NPPF 2018. It is not considered that it affects the HRA Main Report conclusions.</i>
<b>MM   16</b> (Previously PMM   01)	Policy MS01 (1 <sup>st</sup> sentence and the 1 <sup>st</sup> , 3 <sup>rd</sup> , 4 <sup>th</sup> and 5 <sup>th</sup> clauses, page 35)	<p>Revise the 1<sup>st</sup> sentence and the 1<sup>st</sup>, 3<sup>rd</sup>, 4<sup>th</sup> and 5<sup>th</sup> clauses of Publication MLP Policy MS01: -</p> <p>Non-mineral developments <b><u>proposals</u></b> within a Mineral Safeguarded Area (MSA) will be permitted provided: -</p> <ol style="list-style-type: none"> <li>I. <b><u>it is they are</u></b> exempt from <b><u>safeguarding requirements</u></b> as set out in the list contained in table 2; or</li> <li>II. needless sterilisation of mineral resources will not occur; or</li> <li>III. the mineral <b><u>resources of</u></b> concerned <b><u>is-are</u></b> not economically valuable; or</li> <li>IV. it is appropriate and practicable to extract <b><u>the-minerals</u></b> prior to development taking place; or</li> <li>V. the overriding need for <b><u>the-development</u></b> outweighs the desirability to safeguard</li> </ol>	<i>This clarification of the process that will operate does not affect the HRA Main Report conclusions.</i>

MM Reference (former reference used in Examination document EX5a – Proposed Modifications)	Origin of MM within MLP (paragraph and / or policy location and page no.)	Main Modifications (MMs) brought forward by GCC	HRA Review of Main Modification Outcome
		mineral resources.	
MM   17 (Previously PMM   02)	Supporting text to Policy MS01 (Table 2, page 37)	<p>Add a new bullet point item at the end of the list in Table 2 of Publication MLP page 37: -</p> <ul style="list-style-type: none"> <li><b>All development considered under the 'Permission in Principle' consent route unless the Mineral Planning Authority (MPA) specifically requests that a Mineral Resource Assessment is included on the local Brownfield Land Register entry or a 'Permission in Principle' decision notice.</b></li> </ul>	Addition that does not affect the HRA Main Report conclusions.
MM   18 (Previously PMM   03)	Supporting text to Policy MS01 (paragraph 122, pages 37-38)	<p>Revise Publication MLP paragraph 122: -</p> <p>A MRA will need to consider the site specific nature of the mineral resources present along with an analysis of the relationship between these resources and the proposed non-minerals development. <b>The MRA must meet PERC Reporting Standards</b> <small>New footnote</small>. <b>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.</b> In addition to assessing <b>In making a judgement, careful consideration will be given to technical details concerning</b> the extent to which non-minerals development may <b>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</b> overlay mineral resources, attention should be given to accessibility issues affecting the potential to exploit unworked and currently worked resources. The risk of unreasonably curtailing / constraining permitted mineral working activities should also be investigated.</p> <p><small>New footnote</small> <b>PERC refers to Pan-European Reserves and Resources Reporting Committee Standard of Exploration, Results and Mineral Resources - <a href="http://www.percstandard.eu">http://www.percstandard.eu</a></b></p>	Clarification that does not affect the HRA Main Report conclusions.
MM   19 (New proposed modification)	Supporting text to policy MS02 (paragraph 130, page 39)	<p>Revise Publication MLP paragraph 130: -</p> <p>Effective site safeguarding for the county's mineral infrastructure is therefore needed to avoid conflicting land uses from disrupting supply networks and / or generating a loss of handling capacity or future capability. <b>Safeguarding in this manner also accords with the 'agent of change' planning principle that is laid down in national policy through the revised NPPF 2018</b> <small>[new footnote]</small> ..</p> <p><small>New footnote</small> <b>National Planning Policy Framework (NPPF) 2018, paragraph 182</b></p>	An addition/clarification that describes accordance with the revised NPPF 2018. It is not considered that it affects the HRA Main Report conclusions.
MM   20 (Previously PMM	Policy MW01 (1 <sup>st</sup> clause, page 47)	Revise the 1 <sup>st</sup> clause of Publication MLP Policy MW01: -	Evidence clarification that does not affect the HRA Main Report conclusions.

MM Reference (former reference used in Examination document EX5a – Proposed Modifications)	Origin of MM within MLP (paragraph and / or policy location and page no.)	Main Modifications (MMs) brought forward by GCC	HRA Review of Main Modification Outcome
04)		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, <del>calculated using the rolling 10 years' sales based on the LAA rate data presented published</del> in the <u>most recent</u> annual Gloucestershire Local Aggregates Assessment; and	
MM   21 (Previously PMM   05)	Supporting text to Policy MW02 (paragraph 174, page 51)	<p>Revise the final sentence of Publication MLP paragraph 174: -</p> <p>In carrying out an assessment of sustainability, a review of the potential impacts on key designations will be required. Attention must be given to key designations present in the locality such as the valued landscapes of the Cotswolds and Wye Valley AONBs. The scale and significance of any impacts on the conservation of the landscape and scenic beauty, and ability to protect wildlife and cultural heritage will be of paramount importance. Meeting the relevant criteria set out in policies DM06, DM08 and DM09 and MR01 will be crucial. However, as supported by national policy, a degree of flexibility may be shown when analysing individual proposals for small-scale natural building stone workings, <del>which are likely to operate over a protracted timescale, experience low rates of working and / or periods of intermittency</del> <u>Subject to the merits of any given proposal and consideration of possible environmental impacts, 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 desirable</u><sup>84</sup>.</p>	<p><i>Deletion, addition and clarification that do not affect the HRA Main Report conclusions.</i></p>
MM   22 (Previously PMM   06)	Supporting text to Policy MW02 (paragraph 176, page 51)	<p>Revise Publication MLP paragraph 176: -</p> <p>Natural building stone working <del>may</del> positively contributes to the economic well-being and cultural heritage of the county's rural local communities. <del>This may arise</del> <u>It does so through the directly and indirect through</u> local employment opportunities <u>and indirectly by contributing to the localities attractiveness as an area for tourism, recreation and other businesses</u>, being offered. Support for new or sustained local skilled labour, particularly traditional quarrying-related skills <del>will</del> <del>may</del> be a noteworthy benefit <u>with mineral development proposals for the working of building stone</u>. Appropriate provision for local apprenticeships secured either by way of a planning condition or a planning obligation could <u>also prove to</u> be materially significant <u>in the decision making process</u><sup>86</sup>. However, <u>in accordance with the 'agent of change' planning principle, proposals for new or extended natural building stone working that could have a significant adverse effect on the operation of other existing established businesses will need to provide suitable mitigation measures.</u> <sup>(new footnote)</sup> <u>This will ensure the broader local economy is not unduly weakened or suffers from a net decline as a consequence of new mineral developments. In assessing 'agent of change' impacts consideration will be given to</u></p>	<p><i>Deletions, additions and clarification that do not affect the HRA Main Report conclusions.</i></p>

MM Reference (former reference used in Examination document EX5a – Proposed Modifications)	Origin of MM within MLP (paragraph and / or policy location and page no.)	Main Modifications (MMs) brought forward by GCC	HRA Review of Main Modification Outcome
		<p><u>the temporary nature of mineral working, that some adverse impacts are unavoidable and there may be a lack of alternative options given minerals can only be worked where they are found. Advice should be sought from the MPA at the earliest possible opportunity and ideally at the early pre-application stage, to establish whether matters relating to the 'agent of change' are relevant or to what extent they will need to be addressed.</u> it is equally important to demonstrate how any potential negative economic impacts will be sufficiently outweighed. An assessment of possible impacts on the future economic performance of other industries that are operating locally and / or which are being promoted through regeneration and growth initiatives may represent justified and credible evidence.</p> <p><u>New footnote National Planning Policy Framework (NPPF) 2018, paragraph 182</u></p>	
MM   23 (New proposed modification)	Supporting text to Policy MW06 (paragraph 210, page 63)	<p>Revise Publication MLP paragraph 210: -</p> <p>Worked minerals may need to undergo some form of processing before they can be put to use. This may include washing, screening, crushing, cutting and bagging. It could also involve secondary processing such as the manufacturing of coated materials (e.g. asphalt); batching for mortar and concrete; and block, tile and brick-making, often this will include bringing other materials and minerals to the site to manufacture the final product. <u>In addition, the production of secondary and / or recycled aggregates could be incorporated to complement primary mineral working and processing, and to support the delivery of post-working site restoration.</u> Where this takes place within an existing mineral site it is termed ancillary minerals development.</p>	<i>Addition and clarification that does not affect the HRA Main Report conclusions.</i>
MM   24 (Previously PMM   07)	Policy MW06 (2 <sup>nd</sup> and 5 <sup>th</sup> clauses, pages 63 and 64)	<p>Revise the 2<sup>nd</sup> and 5<sup>th</sup> clauses of Publication MLP Policy MW06: -</p> <p>II. any importation of minerals <u>and other materials used to produce secondary and / or recycled aggregates</u> from elsewhere will represent an environmentally acceptable and sustainable option; and</p> <p>V. a positive contribution will be made to sustaining or growing the local economy and <u>/ or</u> upholding cultural heritage throughout Gloucestershire.</p>	<i>Addition and clarification that does not affect the HRA Main Report conclusions.</i>
MM   25 (New proposed modification)	Supporting text to Policy MW 06 (paragraph 214, page 64)	<p>Revise Publication MLP paragraph 214: -</p> <p>Proposals for ancillary minerals development will need to demonstrate how they will be beneficial to and function alongside mineral working activities at the site. In doing so information will be required to show how mineral processing <u>and the production of secondary and / or recycled aggregates</u> will support diversity of mineral supplies and / or will be able to</p>	<i>Addition that does not affect the HRA Main Report conclusions.</i>

<b>MM Reference</b> (former reference used in Examination document EX5a – Proposed Modifications)	<b>Origin of MM within MLP</b> (paragraph and / or policy location and page no.)	<b>Main Modifications (MMs) brought forward by GCC</b>	<b>HRA Review of Main Modification Outcome</b>																		
		achieve certain mineral product specifications. Details of the arrangements concerning the temporary nature of any built structures will be necessary. This should incorporate a timetable for closure and dismantling, which will ensure previously approved mineral site restoration will not be prejudiced.																			
<b>MM   26</b> (New proposed modification)	Supporting text to Policy MW 06 (paragraph 215, page 64)	Revise Publication MLP paragraph 215:-  Proposals that incorporate the importation of minerals <b><u>and other materials to support the production of secondary and / or recycled aggregates</u></b> from elsewhere must be shown to be environmentally acceptable and accord with the principles of sustainable development.	<i>Addition and clarification that does not affect the HRA Main Report conclusions.</i>																		
<b>MM   27</b> (Previously PMM   08)	Supporting text to Policy MW06 (paragraph 217, page 65))	Revise the 1 <sup>st</sup> sentence of Publication MLP paragraph 217: -  A comparative analysis will be required <b><u>for ancillary mineral development proposals involving the importation of any minerals and other materials</u></b> where existing, permitted alternative <b><u>processing</u></b> arrangements are potentially available nearby. Evidence as to why it is not practicable and / or viable to use alternative facilities will be necessary. The ability to achieve certain product specifications and / or to facilitate the creation of desirable blended products could be a reasonable justification, although this will need to be demonstrated through supporting evidence. In addition, information concerning the efficient movement of minerals could also prove to be significant. A justification will be necessary to show how allowing ancillary development rather than using alternative facilities will make a positive contribution to reducing transport-related impacts and / or greenhouse gas emissions by way minimising freight miles travelled or the use of more appropriate freight routes. The plans for site restoration and the impact on its timely delivery at the proposal site <b><u>and alternative facilities</u></b> should also be factored into the analysis.	<i>Deletion and additions that do not affect the HRA Main Report conclusions.</i>																		
<b>MM   28</b> (New proposed modification)	Supporting text to Policy MA01 (page 66)	Introduction of a new table after paragraph 223: -  <b>Forest of Dean (FoD) Limestone resource area:</b> <table border="1" data-bbox="574 1208 1612 1494"> <thead> <tr> <th data-bbox="574 1208 871 1335">MLP Allocations</th> <th data-bbox="871 1208 1163 1335">Resource area requirement (at 2016)<sup>†</sup> (after landbank deductions)</th> <th data-bbox="1163 1208 1388 1335">Potential yield</th> <th data-bbox="1388 1208 1612 1335">% Contribution to the resource area requirement</th> </tr> </thead> <tbody> <tr> <td data-bbox="574 1335 871 1367">Allocation 01</td> <td data-bbox="871 1335 1163 1367" rowspan="3">10.426mt (FoD)</td> <td data-bbox="1163 1335 1388 1367">Between 10 and 17mt</td> <td data-bbox="1388 1335 1612 1367">96% - 100% +</td> </tr> <tr> <td data-bbox="574 1367 871 1399">Allocation 02</td> <td data-bbox="1163 1367 1388 1399">Between 3 and 4 mt</td> <td data-bbox="1388 1367 1612 1399">29% - 38%</td> </tr> <tr> <td data-bbox="574 1399 871 1430">Allocation 03</td> <td data-bbox="1163 1399 1388 1430">7.4mt</td> <td data-bbox="1388 1399 1612 1430">71%</td> </tr> <tr> <td data-bbox="574 1430 871 1494">Total for allocations 01,02,03</td> <td data-bbox="871 1430 1163 1494">10.426mt (FoD)</td> <td data-bbox="1163 1430 1388 1494">Between 20.4mt and 28.4mt</td> <td data-bbox="1388 1430 1612 1494">100% +</td> </tr> </tbody> </table>	MLP Allocations	Resource area requirement (at 2016) <sup>†</sup> (after landbank deductions)	Potential yield	% Contribution to the resource area requirement	Allocation 01	10.426mt (FoD)	Between 10 and 17mt	96% - 100% +	Allocation 02	Between 3 and 4 mt	29% - 38%	Allocation 03	7.4mt	71%	Total for allocations 01,02,03	10.426mt (FoD)	Between 20.4mt and 28.4mt	100% +	<i>Addition/Clarification that does not affect the HRA Main Report conclusions.</i>
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		<p><b>Cotswolds (C'wolds) Limestone resource area:</b></p> <table border="1" data-bbox="579 393 1612 663"> <thead> <tr> <th data-bbox="579 393 871 520">MLP Allocations</th><th data-bbox="871 393 1163 520">Resource area requirement (at 2016)<sup>+</sup> (after landbank deductions)</th><th data-bbox="1163 393 1455 520">Potential yield</th><th data-bbox="1455 393 1612 520">% Contribution to the resource area requirement</th></tr> </thead> <tbody> <tr> <td data-bbox="579 520 871 568">Allocation 04</td><td data-bbox="871 520 1163 568" rowspan="2">3.016mt (C'wolds)</td><td data-bbox="1163 520 1455 568">Up to 9mt</td><td data-bbox="1455 520 1612 568">100% +</td></tr> <tr> <td data-bbox="579 568 871 616">Allocation 05</td><td data-bbox="1163 568 1455 616">Up to 10mt</td><td data-bbox="1455 568 1612 616">100% +</td></tr> <tr> <td data-bbox="579 616 871 663"><b>Total for allocations 04 and 05</b></td><td data-bbox="871 616 1163 663"><b>3.016mt (C'wolds)</b></td><td data-bbox="1163 616 1455 663"><b>Up to 19mt</b></td><td data-bbox="1455 616 1612 663"><b>100 % +</b></td></tr> </tbody> </table> <table border="1" data-bbox="579 695 1612 822"> <tbody> <tr> <td data-bbox="579 695 871 822"><b>Total for allocations 01,02,03,04 and 05</b></td><td data-bbox="871 695 1163 822"><b>Resource requirement countywide = 13.442mt</b></td><td data-bbox="1163 695 1455 822"><b>Potential yield countywide = Between 39.4 and 47.4 mt</b></td><td data-bbox="1455 695 1612 822"><b>% Contribution to requirement countywide = 100 % +</b></td></tr> </tbody> </table> <p><b>Sand and gravel (countywide):</b></p> <table border="1" data-bbox="579 886 1612 1171"> <thead> <tr> <th data-bbox="579 886 871 1013">MLP Allocations</th><th data-bbox="871 886 1163 1013">Resource area requirement (at 2016) (after landbank deductions)</th><th data-bbox="1163 886 1455 1013">Potential yield</th><th data-bbox="1455 886 1612 1013">% Contribution to the resource area requirement</th></tr> </thead> <tbody> <tr> <td data-bbox="579 1013 871 1060">Allocation 06</td><td data-bbox="871 1013 1163 1060" rowspan="2">9.456mt</td><td data-bbox="1163 1013 1455 1060">7.8mt</td><td data-bbox="1455 1013 1612 1060">82%</td></tr> <tr> <td data-bbox="579 1060 871 1108">Allocation 07</td><td data-bbox="1163 1060 1455 1108">3 mt</td><td data-bbox="1455 1060 1612 1108">32%</td></tr> <tr> <td data-bbox="579 1108 871 1171"><b>Total for allocations 06 and 07</b></td><td data-bbox="871 1108 1163 1171"><b>9.456mt</b></td><td data-bbox="1163 1108 1455 1171"><b>10.8mt</b></td><td data-bbox="1455 1108 1612 1171"><b>100% +</b></td></tr> </tbody> </table> <p>+ The resource area requirements are based on the MLP's provision approach, which presents a '70/30 split' between the Forest of Dean and Cotswold limestone resource areas (see pages 45 to 46 for more details).</p>	MLP Allocations	Resource area requirement (at 2016) <sup>+</sup> (after landbank deductions)	Potential yield	% Contribution to the resource area requirement	Allocation 04	3.016mt (C'wolds)	Up to 9mt	100% +	Allocation 05	Up to 10mt	100% +	<b>Total for allocations 04 and 05</b>	<b>3.016mt (C'wolds)</b>	<b>Up to 19mt</b>	<b>100 % +</b>	<b>Total for allocations 01,02,03,04 and 05</b>	<b>Resource requirement countywide = 13.442mt</b>	<b>Potential yield countywide = Between 39.4 and 47.4 mt</b>	<b>% Contribution to requirement countywide = 100 % +</b>	MLP Allocations	Resource area requirement (at 2016) (after landbank deductions)	Potential yield	% Contribution to the resource area requirement	Allocation 06	9.456mt	7.8mt	82%	Allocation 07	3 mt	32%	<b>Total for allocations 06 and 07</b>	<b>9.456mt</b>	<b>10.8mt</b>	<b>100% +</b>	
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<b>MM   29</b> (New proposed modification)	Supporting text to Policy MA02 (paragraph 233, page 69)	<p>In Gloucestershire, proposals for the working of aggregates outside of allocations may still come forward and could prove to be acceptable in planning terms. This could include the prior-working of aggregate bearing land to avoid needless sterilisation by other development, (see policy MS01); or <del>relatively small scale residual working related to an</del> <u>working adjacent to / or within close proximity of an</u> existing permitted site <u>that would otherwise be impractical to exploit in any other way and / or could secure enhancements to the restoration of the existing permitted site.</u></p>	<i>Deletion and additions that do not affect the HRA Main Report conclusions.</i>																																		

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MM   30 (Previously PMM   09)	Policy MA02 (1 <sup>st</sup> sentence and 1 <sup>st</sup> , 2 <sup>nd</sup> , 3 <sup>rd</sup> , 4 <sup>th</sup> and 5 <sup>th</sup> clauses, page 70)	<p>Revise 1<sup>st</sup> sentence and 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup> and 5<sup>th</sup> clauses and add two new clauses (6<sup>th</sup> and 7<sup>th</sup>) to Publication MLP Policy MA02: -</p> <p>Mineral development proposals for aggregate working outside of allocations will be permitted only where <u>one or more of the following</u> it can be demonstrated: -</p> <p>I. the plan's allocations as set out in policy MA01 are not able to contribute towards maintaining minimum landbank levels in accordance with policy MW01; and / or</p> <p>II. constraints on the availability of existing permitted reserves and / or productive capacity are likely to limit output or restrict the range of available products over the plan period; and / or</p> <p>III. they represent the residual 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; and / or</p> <p><b>III. they represent the working of an area of aggregate mineral resource that is adjacent to / or within close proximity to an existing permitted aggregate working that would otherwise be impractical to exploit in any other way;</b></p> <p>IV. they will facilitate enhancements to previously approved plans for mineral restoration and the achievement of beneficial after-uses that will outweigh the desirability to restrict working from outside of allocated areas; and / or</p> <p><b>IV. they would function as enabling development to allow an allocation for future aggregate working to be delivered or a permitted working to be worked in a more efficient manner;</b></p> <p>V. they will facilitate the working of aggregate minerals prior to non-minerals development taking place in accordance with policy MS01.</p> <p><b>V. they will not prejudice the delivery of previously approved restoration plans and facilitate enhancements to site restoration that will support the achievement of beneficial after-uses and satisfactorily meet the requirements of policy MR01 (Restoration, aftercare and facilitating beneficial after-uses);</b></p> <p><b>VI. they will facilitate the working of aggregate minerals prior to non-minerals development taking place in accordance with policy MS01;</b></p> <p><b>VII. they represent a borrow pit that is justifiably required to facilitate the delivery of a specific adjacent / or nearby development project(s) and will be fully reclaimed as part of the project(s).</b></p>	<p><i>Deletion and additions showing when development outside of MLP allocations would be considered. There are no new implications identified for International / European Sites. Developments coming forward outside allocated sites would have to meet the requirements of this modified policy as well as Policy DM06 too. The changes therefore do not affect the HRA Main Report conclusions.</i></p>
MM   31 (Previously PMM   10)	Supporting text to Policy MA02 (paragraph 239, page 71)	<p>Revise the 1<sup>st</sup>, 2<sup>nd</sup>, 4<sup>th</sup> and 5<sup>th</sup> sentences of Publication MLP paragraph 239: -</p> <p>Aggregate working outside of allocations, which represents <u>that is adjacent to / or within close proximity to an existing permitted aggregate working and would otherwise be impractical to</u></p>	<p><i>Deletion and additions clarifying when development outside of MLP allocations would be considered. There are no new implications identified for International /</i></p>

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		<p><u>exploit in any other way</u> or <u>enabling development</u>, will need careful consideration. Proposals will be assessed <u>on a case by case basis</u> with regards to their size, scale and timeframe compared to the characteristics of the existing <u>or planned for</u> aggregate working site it relates to. Ensuring that mineral working will not be excessively extended will be a critical factor. <u>Evidence of the operational, economic viability, amenity and / or environmental case for allowing non-allocated aggregate working to take place in the manner proposed</u>. Furthermore, <u>The deliverability of</u> previously approved mineral site restoration <u>and aftercare schemes</u> must not be unduly <u>affected inhibited</u>. Although, where <u>it is necessary to make any amendments to any existing revised mineral restoration and aftercare schemes for operational reasons, due consideration will be given to any potential enhancement opportunities that may be achieved (e.g. an increase in public access, improvement in the provision of green infrastructure, facilitating biodiversity gains or the creation of a landform that would be more sympathetic to the local landscape character)</u>, is submitted, this must be acceptable in principle and offer demonstrable benefits with regard to future land use opportunities.</p>	<p><i>European Sites. Developments coming forward outside allocated sites would have to meet the requirements of this modified policy as well as Policy DM06 too. The changes therefore do not affect the HRA Main Report conclusions.</i></p>
MM   32 (Previously PMM   11)	Supporting text to Policy MA02 (after paragraph 240, page 71)	<p>New paragraph to be inserted after Publication MLP paragraph 240: -</p> <p><u>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 potential delivery of a specific, named development that is either subject to a planning application or benefits from a planning consent must be shown. The consequences of the relationship must also meaningfully contribute towards the achievement of 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 inert construction wastes of the supported development. However, under all circumstances site restoration of a borrow pit must be acceptable in planning terms having been appropriately assessed against the relevant development management plan policies from DM01 to DM11 and policy MR01.</u></p>	<p><i>Definition added which does not affect the HRA Main Report conclusions.</i></p>
MM   33 (New proposed modification)	Supporting text to Policy DM01 (paragraph 267, page 77)	<p>Revise Publication MLP paragraph 267: -</p> <p>Amenity impacts can be numerous and differ in frequency, significance and complexity on a case-by-case basis related to the types of activities taking place and the relationship to nearby land uses. Nevertheless, for minerals development there are usual risks that arise such as: -</p>	<p><i>Deletion and addition that gives a clarification that does not affect the HRA Main Report conclusions.</i></p>

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		noise; air pollution from fumes and / or dust; vibration and visual intrusion, which can incorporate light pollution and loss of privacy. The way in which minerals are worked, how they are stored and <del>moved</del> <u>transported in, out and</u> around the site, whether ancillary processing takes place to create saleable products; and the phase of development (e.g. site preparation, working of minerals, implementing restoration etc.) are likely to be influential factors.	
<b>MM   34</b> (New proposed modification)	Supporting text to Policy DM01, (paragraph 268, page 77)	Revise Publication MLP paragraph 268: -  It is important that a balance is struck between enabling the need for minerals to be met through their working <del>and</del> , processing <u>and transportation</u> and ensuring that those who might be affected are afforded protection. The extent to which a good standard of amenity is achievable for all users and occupants of land and buildings now and in the future is a measure of success in this regard and is a core land-use planning principle set out in national policy <sup>127</sup> .	<i>Deletion and addition that do not affect the HRA Main Report conclusions.</i>
<b>MM   35</b> (New proposed modification)	Supporting text to Policy DM01, (paragraph 271, page 78)	Revise Publication MLP paragraph 271: -  Mineral development proposals must be accompanied by thorough investigations concerning amenity impacts. These investigations must be clear in their presentation of outcomes and be able to be scrutinised. They must highlight the potential for adverse amenity impacts to occur and their possible significance. Furthermore, details of any proposed mitigation measures and what commitments and resources will be afforded to them to ensure implementation and routine monitoring must be provided. <u>This could include the delineation on a case-by-case basis of amenity buffer zones between minerals development and sensitive receptors.</u> All monitoring programmes will be carefully scrutinised before any development is allowed to take place.	<i>Positive environmental addition that does not affect the HRA Main Report conclusions.</i>
<b>MM   36</b> (Previously PMM   12)	Supporting text to Policy DM01 (paragraph 272, page 78)	Revise the 2 <sup>nd</sup> sentence of Publication MLP paragraph 272: -  Health Impact Assessments (HIAs) provide information to help decision-makers consider how a proposal might impact, directly or indirectly, on people's health <u>and wellbeing</u> . Mineral development proposals may benefit from the carrying out of an HIA, as <u>public health and wellbeing status and needs are potentially important</u> critical matters that <u>should be need to be considered</u> <u>taken account in the determination of planning proposals</u> <small>(New footnote)</small> . decision-making process, as required by national policy. A successfully completed HIA should present sufficient evidence to determine whether potential significant health related effects will arise from on site mineral working and other associated activities such as restoration, the transportation of minerals and any importation, and where relevant, facilitated after uses following restoration. HIA information may contribute to the reasoned justifications for why	<i>Clarification changes that do not affect the HRA Main Report conclusions.</i>

MM Reference (former reference used in Examination document EX5a – Proposed Modifications)	Origin of MM within MLP (paragraph and / or policy location and page no.)	Main Modifications (MMs) brought forward by GCC	HRA Review of Main Modification Outcome
		<p>certain actions, such as mitigation measures will be necessary. An important feature of a HIA is that it offers a way of ensuring all sections of an affected community will be afforded sufficient scrutiny including those that already experiencing disadvantage and / or present vulnerable health characteristics. <u>A proportionate approach to determining whether a HIA is required will be taken based on the scale and significance of mineral development proposals having regard to the health and wellbeing of local communities. Major mineral schemes that must be accompanied by an Environmental Statement will represent the threshold for considering the need to prepare a HIA. However, major mineral development proposals that are within close proximity to potentially sensitive uses such as schools, child care centres, hospitals, adult and older persons' facilities and leisure and recreational centres will likely require a HIA. Advice from the Director of Public Health should be sought at the earliest possible opportunity and ideally at the early pre-application stage, to establish whether preparing a HIA would represent the most efficient and effective way of presenting supporting evidence on health matters and for determining the scope and level of detail necessary. A HIA can be undertaken as a stand-alone assessment or integrated into a wider Environmental Statement, although in all instances it should be closely aligned with other technical investigations such as those covering environmental and transport impacts</u></p> <p><b>New footnote – Planning Practice Guidance (PPG), Health and wellbeing section, paragraph: 001, reference ID: 53-001-20140306.)</b></p>	
MM   37 (Previously PMM   13)	Supporting text to Policy DM01 (paragraph 273, page 79)	<p>Revise Publication MLP paragraph 273: -</p> <p><u>Where a HIA is completed it should present sufficient evidence to determine whether potential significant health-related effects (positive and / or negative) will arise from on-site mineral working and other associated activities such as restoration, the transportation of minerals and any importation, and where relevant, facilitated after-uses following restoration. HIA information may contribute to the reasoned justification(s) for why certain actions, such as mitigation measures will be necessary or not required. An important feature of a HIA is that it offers a way of ensuring the health and wellbeing of all sections of an affected community will be afforded sufficient scrutiny including those that already experiencing disadvantage and / or present vulnerable health characteristics.</u></p> <p>At the early preparation stage for minerals development proposals, a HIA screening exercise should to be carried out. This must establish whether preparing a HIA will represent the most efficient and effective way of presenting supporting evidence on health matters and for determining the level of detail necessary. A HIA can be undertaken as a stand-alone assessment</p>	<p><i>Clarification changes that do not affect the HRA Main Report conclusions.</i></p>

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		or integrated into a wider Environmental Statement, although in all instances it should be closely aligned with other technical investigations such as those covering environmental and transport impacts. In the event that a HIA is to be prepared, the screening exercise should provide a sound basis for understanding the size and nature of the local communities likely to be affected and to identify in the broadest of terms, what potential risks and impacts on health could occur – positively and / or negatively and in terms of their significance.	
MM   38 (New proposed modification)	Supporting text to Policy DM01 (paragraph 274, page 79)	<p>Delete Publication MLP paragraph 274: -</p> <p>Early engagement with the County Council's as an advisor on local public health matters across Gloucestershire is strongly encouraged. This will ensure that the most appropriate and up to date evidence is being used and to help establish the most effective approach for preparing an HIA. Good practice guidance is also available on HIA in respect of carrying out a screening or scoping exercise and for formal HIA preparations.</p>	<i>Consequential change due to other modifications above. Does not affect the HRA Main Report conclusions.</i>
MM   39 (Previously PMM   14)	Supporting text to Policy DM01 (paragraph 281, page 81)	<p>Revise the 4<sup>th</sup> sentence of the Publication MLP paragraph 281: -</p> <p>Mineral developments can impact upon local air quality. This may occur through the release of particulates from emissions and dust, and <u>in</u><del>on</del> some instances, through unpleasant odours. Air pollution can arise from on-site mineral working activities, but may also be caused by vehicles using unsurfaced roads, from wind blowing across stockpiles and quarry waste storage, and the exposure of unconsolidated, bare ground. An air quality impact assessment <del>based on the advice contained in planning practice guidance should be provided alongside</del> <u>may be necessary to accompany a mineral development proposal and the requirement for such an assessment, will be decided on a case-by-case basis having considered the nature and scale of development and the level of concern about air quality</u> mineral development proposals<sup>135</sup>.</p> <p>Where Assessments <u>are required, they</u> must take into account existing air quality levels prior to development and establish whether any new sources of air pollution are likely to arise and what their influence on existing air quality could be. The impact on air quality from changes to local traffic linked to minerals development both near to the site and / or further afield along defined freight routes will need to be included. Account should also be given to the scale, duration, hours of operation, type of activities being proposed; whether they are likely to be temporary or continuous and the existence of other operations in the same locality.</p>	<i>Clarification changes that do not affect the HRA Main Report conclusions.</i>
MM   40 (New proposed modification)	Supporting text to Policy DM01 (after 286, page 82)	<p>New paragraph to be inserted after Publication MLP paragraph 286:-</p> <p><u>Adverse impacts associated with ground vibration may also be generated by the movement of minerals to and from mineral workings. In Gloucestershire, this is most likely to be a concern</u></p>	<i>Addition which gives some clarification and which does not affect the HRA Main Report conclusions.</i>

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		<p><b><u>with the use of heavy goods vehicles on local roads for means of access and / or local delivery.</u></b></p> <p><b><u>In the event there is a risk of unacceptable adverse impacts occurring with mineral development proposals, careful consideration must be given to the size, scale and frequency of vehicle movements that cause ground vibration and whether it is reasonable and justified to impose operational restrictions through the use of planning conditions.</u></b></p>	
MM   41 (New proposed modification)	Supporting text to Policy DM02 (paragraph 294, page 84)	<p>Revise Publication MLP paragraph 294: -</p> <p>Mineral development proposals will be expected to identify potential cumulative impacts and to show how these will be avoided or sufficiently mitigated to prevent unacceptable adverse impacts from arising. In respect of cumulative impacts related to intensified development across a locality, the parameters for this will need to be agreed on a case-by-case basis depending upon prevailing environmental conditions and geography, the scale of development proposed <b><u>in relation to permitted activities</u></b> and the nature of the individual matter of <b><u>amenity and / or environmental</u></b> concern subject to a cumulative impact assessment. <b><u>Nevertheless, in all instances advice should be sought from the MPA at the earliest possible opportunity and ideally at the early pre-application stage, to establish how cumulative impact matters should be addressed.</u></b></p>	<i>Environmentally positive clarification that does not affect the HRA Main Report conclusions.</i>
MM   42 (New proposed modification)	Supporting text to Policy DM03 (paragraph 297, page 86)	<p>Revise Publication MLP paragraph 297: -</p> <p>Mineral developments are heavily reliant on Gloucestershire's highway networks and those of surrounding areas. They allow for the hauling of minerals to markets or for further processing and provide the means by which staff and customers can gain access. The county's mineral supplies are predominately local in nature and follow well established routes that are strongly aligned with the existing road infrastructure. This presents very limited opportunities for more sustainable modes of <b><u>non-road</u></b> transport such as rail, ports or other inland waterways to attract the necessary interest and accompanying investment to act as a viable alternative. Nevertheless, Gloucestershire still contains numerous rail links, navigable waterways and canals that under the right circumstances could be used as an alternative to the movement of minerals by road.</p>	<i>Small additional qualification that does not affect the HRA Main Report conclusions.</i>
MM   43 (New proposed modification)	Supporting text to Policy DM03 (new paragraph between paragraphs 299 and 300)	<p>New paragraph to be inserted between paragraphs 299 and 300:-</p> <p><b><u>In addition, significant technological advancements across the transport sector are anticipated over the coming years, which will also make a valuable contribution towards tackling climate change. These are likely to include major improvements in fuel efficiency, the introduction of low and ultra-low emission haulage vehicles, and in time, zero emission vehicles that employ only non-fossil based means of power [new footnote].</u></b></p>	<i>Environmentally positive addition which does not affect the HRA Main Report conclusions.</i>

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		<b>[New footnote] - BEIS (2017) Clean Growth Strategy: An ambitious blueprint for Britain's low carbon future</b> <a href="https://www.gov.uk/government/publications/clean-growth-strategy">https://www.gov.uk/government/publications/clean-growth-strategy</a>	
MM   44 (Previously PMM   15)	Policy DM03 (part a, and part c, 1 <sup>st</sup> clause, page 87)	<p>Revise part a and part c of Publication MLP Policy DM03: -</p> <p>Part a   Alternatives to read <u>Sustainable</u> transport Mineral development proposals <u>that minimise</u> <del>will be permitted</del> <u>the miles travelled by minerals and demonstrate how road-based transport will also be kept to a minimum will be permitted</u>. <u>Wherever possible alternative and</u> <del>that</del> use more sustainable, alternative modes of non-road transport <u>must be used along with fuel efficient and / or low, ultra-low or zero greenhouse gas emitting haulage vehicles</u>.</p> <p>Part c   Public Rights of Way (ProW) Network and open access land Mineral development proposals will <u>only</u> be permitted where it can be demonstrated: -</p> <p>I. 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 satisfactorily mitigated; and / or</p>	<i>Environmentally positive changes which do not affect the HRA Main Report conclusions</i>
MM   45 (New proposed modification)	Supporting text to policy DM03 (New paragraph between paragraphs 305 and 306)	<p>New paragraph to be inserted between paragraphs 305 and 306:-</p> <p><u>Furthermore, the benefits resulting from a transition away from fossil-fuel based road haulage should be taken into account. Increasing significance should be given to the most advanced technology available at the time, moving from increased fuel efficiency to low emission vehicles, then ultra-low emission vehicles, and ultimately zero emission vehicles.</u></p>	<i>Environmentally positive addition that does not affect the HRA Main Report conclusions.</i>
MM   46 (Previously PMM   16)	Supporting text to Policy DM03 (paragraph 303, page 88)	<p>Revise Publication MLP paragraph 303: -</p> <p>For new mineral development proposals that use the local and / or strategic highway network, the potential for adverse impacts arising must be carefully scrutinised. National policy provides a clear threshold in this respect, focused on ensuring severe impacts on the highway network is prevented<sup>151</sup>. Particular issues likely to be scrutinised include: - 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 <u>(see also Policy DM01)</u>. These impacts may be of significance to a variety of sensitive receptors located along mineral haulage routes and not just those local communities that are close by to the proposal site. <u>For matters relating to potential impacts on the maintenance of the highway, this is dealt with under s.59 of the Highways Act 1980 and the provision available to recover expenses due to extraordinary traffic</u>.</p>	<i>Changes that do not affect the HRA Main Report conclusions.</i>

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MM   47 (Previously PMM   18)	Policy DM04 (1 <sup>st</sup> clause, 2 <sup>nd</sup> clause, 3 <sup>rd</sup> clause, part a, part b, part c and part d, pages 91 to 93)	<p>Revise 1<sup>st</sup>, 2<sup>nd</sup>. and 3<sup>rd</sup> clauses; add new 4<sup>th</sup>, 5<sup>th</sup>, 6<sup>th</sup>, 7<sup>th</sup> and 8<sup>th</sup> clauses and a new bullet-pointed sentence; delete part a, part b and part c and replace part d with a new bullet-pointed sentence for Publication MLP Policy DM04: -</p> <p>Mineral development proposals will be permitted, where it can be demonstrated: -</p> <ul style="list-style-type: none"> <li>I. <del>they will be resilient to the impacts of flooding; there will be no increase in the risk of flooding on site and elsewhere from all sources of flooding now and in the future;</del></li> <li>II. <del>there will be no increase in the risk of flooding from all sources now and in the future; and- wherever possible, flood risk reduction initiatives will be incorporated that will achieve a reduction in the risk of flooding overall;</del></li> <li>III. <del>wherever possible, flood risk betterment initiatives will be delivered. 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);</del></li> <li>IV. <del>wherever possible, a net increase in flood water storage capacity will be achieved;</del></li> <li>V. <del>where applicable, flood flow routes will be improved such as through the removal of obstructions;</del></li> <li>VI. <del>where 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;</del></li> <li>VII. <del>they accord with the policies contained in the River Severn, Severn Tidal Tributaries and Thames Catchment Flood Management Plans; and</del></li> <li>VIII. <del>any mineral processing plant, associated building(s), and / or equipment should be designed to remain operational, safe for users, and flood resilient during a flood event.</del></li> </ul> <p>The application of a sequential test that will favour the location of development within Flood Zone 1 is fundamental to assessing the acceptability of mineral developments and will be</p>	<p><i>Significant environmentally positive changes to the Policy here do not affect the HRA Main Report conclusions.</i></p>

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		<p>required as part of the supporting evidence for proposals. 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 Sequential Test and, where applicable, the Exception Test as set out in national policy.</p> <p>Mineral development proposals involving sand and gravel working along with water-compatible development<sup>(New footnote)</sup> may be appropriate within 'Flood Risk Zone 3b' or any identified 'functional floodplain', providing that: -</p> <ul style="list-style-type: none"> <li>• there will be no net loss in flood storage and flood risk reduction measures (betterment opportunities) are provided where possible;</li> <li>• there will be no impediment to water flow routes; and</li> <li>• any mineral processing plant, associated building(s), and / or equipment is designed to remain operational, safe for users, and flood resilient during a flood event.</li> </ul> <p>New Footnote - <u>Water compatible development types other than sand and gravel working is set out under Planning Practice Guidance (PPG), Flood risk and coastal change section, paragraph 066, reference ID: 7-066-20140306)</u></p> <p>Part a   Proposals located within Flood Zone 2</p> <p>Mineral development proposals will be permitted in Flood Zone 2, where it can be shown no reasonable alternative locations within Flood Zone 1 are available.</p> <p>Part b   Proposals located within Flood Zone 3a</p> <p>Mineral development proposals will only be permitted in Flood Zone 3a, where they are classified as 'less vulnerable' or 'water compatible' and it can be demonstrated that no reasonable alternative locations are available within both Flood Zones 1 and 2.</p> <p>Part c   Proposals located within Flood Zone 3b (the functional floodplain)</p> <p>Mineral development proposals will only be permitted in Flood Zone 3b, where it can be demonstrated:-</p>	

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		<p>I. <del>they are classified as 'water compatible'; and</del></p> <p>II. <del>there will be no net loss of floodplain storage, no impediment to water flows, and no increase in flood risk elsewhere; or</del></p> <p>III. <del>wider sustainability benefits to the community exist that outweighs the risk of flooding as determined through an exception test.</del></p> <p><b>Part d   Proposals exceeding 1 ha within Flood Zone 1 and all other proposals within Flood Zones 2, 3a or 3b</b></p> <p><b>Mineral development proposals in areas of flood risk and where they exceed 1ha must be accompanied by a Flood Risk Assessment (FRA) that <del>will</del> shows 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 <u>the following</u>: -</b></p> <ul style="list-style-type: none"> <li>• <del>all current and future sources of flooding, appropriately taking into account the anticipated impacts of climate change;</del></li> <li>• <del>set out how flood risk on-site and elsewhere will be effectively managed for the lifetime of the proposal including during site restoration and aftercare; and</del></li> <li>• <del>identify 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.</del></li> </ul>	
MM   48 (Previously PMM   19)	Supporting text to Policy DM04 (paragraph 322, page 94)	<p>Revise the 2<sup>nd</sup> and 3<sup>rd</sup> sentences of Publication MLP paragraph 322: -</p> <p>Mineral development proposals must be able to demonstrate how an increase in flood risk at their immediate location, elsewhere and in the future –<del>taking into account the impacts of climate change</del> will not occur. <b><u>Climate Change Allowances have been published by the Government and these 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.</u></b> All elements of minerals development must <b><u>form part of the assessment of flood risk</u></b> adhere to these requirements, including all built structures, the working of minerals themselves and also the</p>	<i>Consequential changes to supporting text due to changes to PolicyDM04 above. Do not affect the HRA Main Report conclusions.</i>

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MM   49 (Previously PMM   20)	Policy DM05 (1 <sup>st</sup> , 2 <sup>nd</sup> , 3 <sup>rd</sup> , 4 <sup>th</sup> , 5 <sup>th</sup> clauses, page 97)	<p>carrying out of restoration and aftercare.</p> <p>Revise 1<sup>st</sup>, 2<sup>nd</sup>, 3<sup>rd</sup>, 4<sup>th</sup> and 5<sup>th</sup> clauses to Publication MLP Policy DM05: -</p> <p>Mineral development proposals will be permitted where it can be demonstrated: -</p> <ul style="list-style-type: none"> <li>I. <u>there will be no deterioration 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;</u></li> <li>II. <u>they will not prejudice the quantity of water contained within water bodies; measures will be incorporated to enhance and protect water quality, including Gloucestershire's groundwater resources;</u></li> <li>III. <u>due regard has been given to the actions and objectives of the Severn and / or Thames River Basin Management Plan (RBMP) in striving to protect and improve the quality of water bodies 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;</u></li> <li>IV. <u>Unless justifiable and agreeable change is achievable to the physical integrity of watercourses <small>(New Footnote)</small>, they will be preserved and wherever possible 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 or adjoining the development site; and</u></li> <li>V. <u>Wherever possible, measures to achieve the efficient use of water will be delivered including incorporating appropriate water conservation techniques.</u></li> </ul> <p>New Footnote - <u>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.</u></p>	<i>Significant environmentally positive changes to Policy that do not affect the HRA Main Report conclusions.</i>
MM   50 (Previously PMM   21)	Supporting text to Policy DM05 (paragraph 335,	<p>Revise Publication MLP paragraph 335: -</p> <p>Mineral development proposals <u>may benefit from</u> should be supported by a hydrological and</p>	<i>Significant environmentally positive changes to supporting text that do not affect the HRA Main Report conclusions.</i>

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	pages 97 and 98)	<p>hydrogeological assessment that provides <u>incorporates</u> an analysis of risk to water <u>quality and quantity</u> resources and how any possible adverse impacts will be avoided or mitigated. In line with planning practice guidance, <u>The assessment must be carried out where it is anticipated water quality impacts pose a significant</u> should identify the water bodies that represent potential planning concern – those directly affected through proposed modifications or as a consequence of indirect activities<sup>178</sup>. The assessment must also consider the nature of potential adverse impacts upon identified water bodies and the options for reducing impacts to acceptable levels including an analysis of the delivery of effective and deliverable mitigation measures. In certain circumstances a specific WFD Compliance Assessment may also be necessary. <u>A WFD Compliance Assessment will need to consider biological quality, physico-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 reducing impacts to acceptable levels including an analysis of the delivery of effective and deliverable mitigation measures.</u> The <u>overarching</u> objective must be to demonstrate at least, how the current <u>WFD</u> status of identified water bodies will not suffer any deterioration.</p>	
MM   51 (Previously PMM   22)	Supporting text to Policy DM05 (paragraph 336, page 98)	<p>Revise the 1<sup>st</sup>, 4<sup>th</sup> and 6<sup>th</sup> sentences to Publication MLP paragraph 336: -</p> <p><u>In preparing a hydrological and hydrogeological</u> <u>The assessment of water quality and quantity impacts will need to pay</u> particular attention should be paid, where relevant to the Severn River and / or Thames River Basin Management Plans<sup>179</sup>. 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 hydrological influences affecting a larger-than-local area. A catchment-based approach to water management is encouraged through planning practice guidance<sup>180</sup>. 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 <u>improvements, where possible, or to secure</u> there is 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 <u>improvements ambitions</u> outlined within the relevant River Basin Management Plan.</p>	<p><i>Significant environmentally positive changes to supporting text that do not affect the HRA Main Report conclusions.</i></p>
MM   52	Supporting text	Revise the 4 <sup>th</sup> and final sentence of Publication MLP paragraph 337: -	<i>Qualification of approach in respect of</i>

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(Previously PMM   23)	to Policy DM05 (paragraph 337, page 98)	<p>Mineral development proposals involving dewatering activities should be supported by detailed technical evidence as part of a wider hydrological and hydrogeological assessment. The approach put forward must accord with advice published on this matter by the Environment Agency<sup>181</sup>. Furthermore, for locations which contain significant archaeological deposits, potential risks associated with dewatering will need to be careful scrutinised. Where minerals development proposals are located near to <u>could affect</u> watercourses, it will always be preferable for their physical integrity to be preserved. The provision of 'stand-off' strips or areas between the banks of the watercourse affected and mineral working may be an effective means of achieving this <u>and might</u> which may also present a number of complementary activities. Through the appropriate treatment of stand-off areas, visual and / or landscape impacts of mineral developments could be reduced (see policies DM01 and DM09). Stand-off areas may also be used to positively contribute to the management of flood risk (see policy DM04) and / or facilitate tangible biodiversity enhancements (see policy DM06) that in turn may aid the delivery of ecological improvements to the status of water bodies. <u>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 rigorously scrutinised including through consultation with the Environment Agency and / or the Lead Local Flood Authority where necessary, to ensure that an acceptable and deliverable scheme is brought forward that will secure the least amount of change and / or alteration possible.</u></p>	<p><i>watercourses that may be affected by development. Environmentally positive and does not affect the HRA Main Report conclusions.</i></p>
MM   53 (Previously PMM   24)	Policy DM06 (Part a and Part b, pages 101 to 103)	<p>Revise the 1<sup>st</sup> sentence of Part a and 2<sup>nd</sup> paragraph of Part B of Publication MLP Policy DM06: -</p> <p>Part a   Biodiversity and geodiversity outside of designated areas</p> <p>Mineral development proposals that demonstrate the conservation of biodiversity and/or geodiversity, in addition to providing net gains <u>where possible</u>, will normally be permitted. Potential adverse impacts on natural environment assets must be avoided or satisfactorily mitigated in line with Gloucestershire Local Nature Partnership objectives. <u>In exceptional circumstances</u><u>Exceptionally</u>, where an impact cannot be avoided or mitigated, then compensatory measures including the use of <u>biodiversity and / or geodiversity</u> offsets <u>for habitat or geological feature losses</u> will be considered <u>provided these deliver significant net gain</u> as a means to provide an overall net gain. <u>Irreplaceable habitat and geological assets must be retained and protected from deterioration unless this cannot be avoided because there are exceptional overriding reasons of demonstrable public benefit.</u></p>	<p><i>Additions and deletions providing clarification of approach in respect of allowing biodiversity offsetting in exceptional circumstances. Protection of irreplaceable habitats and approach to net gains is made explicit and is now more consistent with the NPPF (2018). Correction of name change for a type of local site is also proposed here. These environmentally positive changes do not affect the HRA Main Report conclusions.</i></p>

<b>MM Reference</b> (former reference used in Examination document EX5a – Proposed Modifications)	<b>Origin of MM within MLP</b> (paragraph and / or policy location and page no.)	<b>Main Modifications (MMs) brought forward by GCC</b>	<b>HRA Review of Main Modification Outcome</b>
		<p>Part b   Designated sites and protected species</p> <p>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 will only be permitted, where they have been subject to an Appropriate Assessment, which has determined that either:-</p> <ul style="list-style-type: none"> <li>I. there will be no adverse effect upon the integrity of such designated sites; or</li> <li>II. where adverse effects on integrity have been concluded, has satisfactorily addressed the subsequent stages in the Habitats Regulations Assessment (HRA) process as set out in table 3, which present imperative reasons of overriding public interest.</li> </ul> <p>Mineral development proposals will only be permitted within designated Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and in localities that could have an impact upon such designations, where it can be demonstrated: -</p> <ul style="list-style-type: none"> <li>I. there will be no conflict with the conservation, management and enhancement of a designation;</li> <li>II. that any potentially harmful aspects of mineral development can be satisfactorily mitigated; and</li> <li>III. there would be no wider indirect and/or cumulative impact on the national network of SSSIs; or where the benefits of mineral development clearly outweigh the potential adverse impacts upon the key features of any designation.</li> </ul> <p>Mineral development proposals on local sites that include Local Nature Reserves (LNR), Gloucestershire <b>Key Local</b> Wildlife Sites (<b>KLWS</b>) and Regionally Important Geological Sites (RIGS) and in localities that could have an impact upon such designations will be permitted where it can be demonstrated: -</p> <ul style="list-style-type: none"> <li>I. adverse impacts can be avoided and /or satisfactorily mitigated; or</li> <li>II. where the benefits of minerals development clearly outweigh the potential adverse impacts upon the key features of any designation.</li> </ul> <p>Mineral development proposals that could adversely affect legally protected species will only be</p>	

MM Reference (former reference used in Examination document EX5a – Proposed Modifications)	Origin of MM within MLP (paragraph and / or policy location and page no.)	Main Modifications (MMs) brought forward by GCC	HRA Review of Main Modification Outcome
		permitted where it can be demonstrated that suitable safeguarding measures will be provided.	
MM   54 (New proposed modification)	Supporting text to Policy DM06 (paragraph 353, page 106)	<p>Revise Publication MLP paragraph 353: -</p> <p>As highlighted in national policy, irreplaceable habitats including ancient woodland and aged or veteran trees found outside of ancient woodland, which clearly cannot be replaced should not be subject to loss or deterioration in condition. <u>However, in extreme circumstances where a significant public benefit can be proven, which clearly overrides the loss or deterioration of irreplaceable habitats, development may be acceptable</u> <small>[new footnote]</small>. Mitigation will only be acceptable where it will result in a reduction in residual adverse impacts to such an extent, that the benefits of the development will outweigh any occurrence of loss<sup>189</sup>. Standing advice prepared by Natural England and the Forestry Commission on development with ancient woodland and veteran trees should be reviewed at <u>the earliest possible opportunity and ideally during at the initial pre-application preparations stage</u><sup>190</sup>.</p> <p><small>New footnote National Planning Policy Framework (NPPF) 2018, paragraph 175</small></p>	<p><i>Additions and deletions providing clarification of approach in respect of allowing biodiversity offsetting and protection of irreplaceable habitats and approach to net gains is made explicit which is more consistent with the NPPF (2018). These positive environmental changes do not affect the HRA Main Report conclusions.</i></p>
MM   55 (Previously PMM   25)	Policy DM07 (2 <sup>nd</sup> and 4 <sup>th</sup> clause, page 108)	<p>Revise the 2<sup>nd</sup>, 3<sup>rd</sup> and 4<sup>th</sup> clauses of Publication MLP Policy DM07: -</p> <p>Mineral development proposals will be permitted where they have been informed by and are sympathetic to the protection of soil resources by demonstrating: -</p> <ul style="list-style-type: none"> <li>I. unacceptable adverse impacts on the quality of soil including as a result of disturbance and / or from contamination will be avoided or satisfactorily mitigated; and</li> <li>II. <u>wherever possible, measures to achieve improvements in opportunities for soil quality enhancement will be delivered</u> facilitated; and</li> <li>III. where Best and Most Versatile Agricultural Land (BMVAL) is present, it will be avoided, or where this is not possible, it will be restored to the highest grade possible <u>unless in doing so, beneficial restoration that outweighs the importance of protecting soil resources would be compromised</u> and any other potential adverse impacts will be kept to a minimum; or</li> <li>IV. the <u>overall</u> benefits of minerals development will clearly outweigh unacceptable adverse impacts on the quality of soil <u>and / or opportunities to achieve soil quality</u></li> </ul>	<p><i>Deletions. Additions and qualifications are environmentally positive overall and the changes do not affect the HRA Main Report conclusions.</i></p>

<b>MM Reference</b> (former reference used in Examination document EX5a – Proposed Modifications)	<b>Origin of MM within MLP</b> (paragraph and / or policy location and page no.)	<b>Main Modifications (MMs) brought forward by GCC</b>	<b>HRA Review of Main Modification Outcome</b>
		<b><u>improvements</u> to justify the grant of planning permission <b>being granted</b>.</b>	
<b>MM   56</b> (Previously PMM   26)	Supporting text to Policy DM08 (paragraph 372, page 112)	<p>Revise Publication MLP paragraph 372: -</p> <p>However, in recognition that certain archaeological assets may not be identifiable or fully appreciated early on in the decision-making process, it <del>may be</del> <ins>is</ins> reasonable for a phased approach to be adopted for assessing significance and determining the subsequent treatment of assets, which involves initial desk-based assessment and / or field evaluations. A clear national framework for assessing the significance of heritage assets is provided by national policy, which sets out specific requirements of prospective applicants and expectations for determining planning authorities<sup>209</sup>. There is a necessity for the G-HER to be consulted and technical expertise should also be <u>sought</u> employed, where necessary.</p>	<i>Minor text changes that do not affect the HRA Main Report conclusions.</i>
<b>MM   57</b> (Previously PMM   27)	Supporting text to Policy DM08 (paragraph 374, page 113)	<p>Revise the 1<sup>st</sup> and 2<sup>nd</sup> sentences of Publication MLP paragraph 374: -</p> <p>From a minerals planning perspective, the ability to maintain steady and adequate supplies of an important mineral is a material consideration that may <u>outweigh any</u> substantial degree of harm caused to the significance of an affected heritage asset. <del>It should however</del> <ins>Nevertheless, be noted that</ins> <u>attempts to avoid harm should be explored wherever possible</u>. <del>it is expected that to avoid harm, alternative options should first be considered</del>.</p>	<i>Minor text changes that do not affect the HRA Main Report conclusions.</i>
<b>MM   58</b> (New proposed modification)	Supporting text to Policy DM09 (paragraph 392, page 120)	<p>Revise Publication MLP paragraph 392: -</p> <p>A robust comparative analysis must also be undertaken with <b>major mineral developments</b> to show that non-AONB sources of the type of mineral proposed to be worked and / or processed will not be appropriate. Careful consideration will be given to evidence concerning the present and forecast future availability of non-AONB mineral supplies and its suitability to meet the same technical specifications. Before any judgement can be made, information must be submitted to establish the size and scale of the pattern of mineral supplies that could be affected; whether productive capacity issues might arise with non-AONB supplies; and a robust explanation of any other possible supply challenges, <u>including matters of sustainability</u> that might emerge from having to rely upon alternative non-AONB sources. <u>The fact that minerals can only be worked where they occur and that their distribution is therefore limited will be a defining factor in determining whether a comparative analysis is necessary. Furthermore, the importance of the mineral to be worked in meeting local, sub-national and national needs will be an important matter that will be taken into account by decision makers. At the earliest possible opportunity and ideally at the initial pre-application stage, advice should be sought from the MPA regarding the preparation of a comparative analysis of potential, alternative non-AONB mineral supplies.</u></p>	<i>Qualifications that do not affect the HRA Main Report conclusions.</i>

<b>MM Reference</b> (former reference used in Examination document EX5a – Proposed Modifications)	<b>Origin of MM within MLP</b> (paragraph and / or policy location and page no.)	<b>Main Modifications (MMs) brought forward by GCC</b>	<b>HRA Review of Main Modification Outcome</b>
<b>MM   59</b> (Previously PMM   28)	Supporting text to Policy DM10 (paragraph 397, pages 122 and 123)	<p>Revise 1<sup>st</sup> and 2<sup>nd</sup> sentence of Publication MLP paragraph 397: -</p> <p>National policy also makes provision for mineral <u>extraction</u> working to be allowed to take place in principle within the Green Belt where openness is preserved and no conflict will occur with purposes of the designation<sup>231</sup>. <u>Evidence that considers both anticipated visual impacts and spatial effects of mineral extraction on the openness of the Green Belt will be required by decision makers.</u> This is reflective of the temporary nature and low intensity of any built structures such as certain forms of plant that usually accompanies this type of activity.</p>	<i>Clarification that does not affect the HRA Main Report conclusions.</i>
<b>MM   60</b> (Previously PMM   29)	Policy MR01 (1 <sup>st</sup> clause, page 126)	<p>Revise the 1<sup>st</sup> clause of Publication MLP Policy MRO1: -</p> <p>Mineral development proposals will be permitted where it can be demonstrated high quality restoration and aftercare will: -</p> <ul style="list-style-type: none"> <li>I. take place at the earliest opportunity and without generating unacceptable adverse impacts; <u>and</u></li> <li>II. be delivered to a high environmental standard; and</li> <li>III. facilitate beneficial after-uses that will contribute to the delivery of sustainable development.</li> </ul>	<i>Clarification that does not affect the HRA Main Report conclusions.</i>
<b>MM   61</b> (Previously PMM   30)	Supporting text to Policy MR01 (paragraph 413, page 127)	<p>Revise the 2<sup>nd</sup>, 3<sup>rd</sup> and 4<sup>th</sup> sentences of Publication MLP paragraph 413: -</p> <p>Provision for site restoration and aftercare will be heavily <u>dependent</u> upon the nature of the minerals development under consideration and site-specific circumstances present at the time. <del>For existing permitted workings, evidence will be required as to how previously agreed restoration and aftercare commitments will not be adversely affected. Existing planning conditions related to the cessation of operations, equipment removal and end dates should not be compromised without justification. Proposals that seek to vary previously permitted restoration and aftercare schemes will be subject to rigorous scrutiny. Information must be presented to show how the environmental condition of previously approved development, will not be degraded. Where restoration and aftercare proposals of permitted mineral workings need to be revised, careful consideration must be given to any potential adverse impacts on the envisaged, final environmental status of the site once it has been restored. In all cases the possibility of environmental degradation must be avoided. If revised restoration aims to deliver enhancement opportunities, these must be clearly identified in the supporting evidence.</del> Further enhancement opportunities deemed achievable through a modified restoration and aftercare scheme will be carefully assessed and only where positive change is materially significant and delivered to a high quality standard, will this be seen as beneficial. <u>For</u></p>	<i>Clarification that is generally environmentally positive and does not affect the HRA Main Report conclusions.</i>

MM Reference (former reference used in Examination document EX5a – Proposed Modifications)	Origin of MM within MLP (paragraph and / or policy location and page no.)	Main Modifications (MMs) brought forward by GCC	HRA Review of Main Modification Outcome
		More substantial mineral development proposals or those likely to involve a fundamental change to an existing restoration and aftercare scheme plan, will need to be accompanied by a detailed revised restoration strategy will be required.	
MM   62 (Previously PMM   31)	Supporting text to Policy MR01 (paragraph 427, page 132)	<p>Delete Publication MLP paragraph 427: -</p> <p>Possible benefits linked to importing materials for restoration purposes such as improving in-soil conditions must be justified in terms of their wider sustainability credentials. This should include consideration of the proposed time period over which importation will occur; the impact importation may have on the timescales for completing restoration and facilitating the delivery of future beneficial after-uses; and the transport implications incorporating effects and significance on the safe and efficient functioning of the highway network and possible impacts on local actions for tackling climate change. Evidence used to show the relevant criteria of policies DM01, DM03, DM05, DM08, DM07 and DM09 have been met, could reasonably be applied in these circumstances.</p>	<i>Deletion due to matters covered adequately elsewhere. Change that does not affect the HRA Main Report conclusions.</i>
MM   63 (Previously PMM   32)	Supporting text to Policy MR01 (paragraph 428, page 132)	<p>Revise the 1<sup>st</sup> and final sentence of Publication MLP paragraph 428: -</p> <p>Importing recovered waste<sup>259</sup> for use in mineral restoration may be considered a recovery operation that is acceptable as outlined in paragraph 4.43 of the adopted Gloucestershire Waste Core Strategy<sup>260</sup>. Imported waste suitable for mineral restoration but managed by way of disposal to landfill, might also be justified<sup>261</sup>. However, for the latter, the relevant criteria contained within adopted Gloucestershire Waste Core Strategy policy WCS 8 (Landfill) (or future replacement) will need to be successfully addressed<sup>262</sup>.</p>	<i>Clarification change that does not affect the HRA Main Report conclusions.</i>
MM   64 (New proposed modification)	Monitoring Schedule (page 135)	<p>Revise Publication MLP Monitoring Schedule: -</p> <p>Add indicators for Policy SR01  </p> <p><u>Planning applications for minerals development involving infrastructure for the production of secondary and / or recycled aggregates;</u></p> <p><u>Planning applications for non-minerals development involving infrastructure for the production of secondary aggregates</u></p> <p>Revise existing indicator for Policy SR01  </p> <p>Planning applications for major (non-minerals) development that will require aggregates for construction accompanied by a Waste Minimisation Statement (WMS) that incorporate the reuse of construction, demolition and excavation waste in construction and the procurement of construction materials with a recycled content.</p>	<i>Revision and addition of MLP indicators does not affect the HRA Main Report conclusions.</i>

MM Reference (former reference used in Examination document EX5a – Proposed Modifications)	Origin of MM within MLP (paragraph and / or policy location and page no.)	Main Modifications (MMs) brought forward by GCC	HRA Review of Main Modification Outcome
		<p>Revise existing target for Policy SR01   100% of permitted major (non-minerals) development applications committing to the use of secondary and / or recycled aggregates in their construction <u>accompanied by a Waste Minimisation Statement (WMS) that incorporate re-use of construction, demolition and excavation waste in construction and the procurement of construction materials with a recycled content.</u></p> <p>Add indicators for Policy MW01   <u>Most recently published landbank of permitted reserves for crushed rock aggregate covering the West of England (WoE) Authorities;</u></p> <p><u>Most recently published landbank of permitted reserves for sand and gravel aggregate covering the neighbouring Mineral Planning Authorities of Herefordshire, Oxfordshire, Wiltshire and Worcestershire.</u></p> <p>Ass review triggers for Policy MW01   <u>Evidence of a significant annual decline and / or declining trend of least 3 years in the published landbank of permitted reserves for either crushed rock or sand and gravel aggregates for neighbouring and / or nearby authority areas as reported within Local Aggregate Assessments (LAAs) and Aggregate Working Party (AWP) Annual Reports and / or at Duty to Cooperate (DtC) meetings.</u></p>	
MM   65 (New proposed modification)	Appendix 2 (page 142)	<p>Revise the schedule of safeguarded mineral infrastructure sites: -</p> <p>Add two sites for handling and / or processing and distributing recycled and secondary aggregates -</p> <p><u>Land at Cowfield Mill, Northway Lane, Tewkesbury GL20 8JG</u> <u>Land at Shurdington Road, Shurdington, Cheltenham GL51 4HU</u></p>	<p><i>Omission of existing <u>known</u> facilities/sites that should have been referenced in the MLP for safeguarding does not affect the HRA Main Report conclusions.</i></p>
MM   66 (New proposed modification)	Appendix 4 (‘Water resources’ theme of Allocation 01: Land east of Stowe Hill)	<p>Revise the Water resources theme for Publication MLP Allocation 01: -</p> <p>A hydrological / hydrogeological impact assessment in accordance with EA guidance will be required. As the underlying geology of the allocation is classified as a Principal aquifer, attention will need to be given to identifying and quantifying risks associated with all possible minerals-related development activities (e.g. working, processing and site restoration) to groundwater resources and for establishing a stringent monitoring regime commencing 24-months prior to</p>	<p><i>Consistency and consequential changes of a positive environmental nature. These do not affect the HRA Main Report conclusions.</i></p>

<b>MM Reference</b> (former reference used in Examination document EX5a – Proposed Modifications)	<b>Origin of MM within MLP</b> (paragraph and / or policy location and page no.)	<b>Main Modifications (MMs) brought forward by GCC</b>	<b>HRA Review of Main Modification Outcome</b>
	Quarry, page 145)	<p>development, continuing throughout the operational phase, and including site restoration and aftercare. In addition, <u>potential</u> hydrological impacts on nearby surface water bodies (up to 5km) will require scrutiny. These include: - several tributaries of Oakwood Brook, a small spring and the resulting flow into the Slade Brook, several unnamed springs to the north of the allocation, Valley Brook, Warth Brook and Cannop Brook. However, a more definitive sphere of hydrological influences will need to be established through a Water Features Survey. This could identify other and / or more distant surface water bodies that are also worth assessing along with other relevant receptors. Particular attention will need to be given to the potential hydrological / hydrogeological impacts on the Slade Brook SSSI. This contains a karst feature – an active tufa-forming stream, which is likely to be sensitive to local hydrological and hydro-geochemical change. There are known hydrological linkages between the SSSI and the allocated area.. An holistic approach should be adopted when considering the Slade Brook SSSI with technical advice on this matter sought from both the EA and Natural England at the earliest possible opportunity. Avoiding the derogation of the SSSI must be the primary focus. Possible cumulative / in-combination hydrological / hydrogeological impacts associated with permitted mineral working and other related activities should also be considered such as proposed restoration and aftercare at the existing Stowe Hill Quarry and the adjacent Clearwell Quarry. The HIA will need to establish mitigation requirements and where necessary provide a strategy for their implementation. It must also incorporate a strategic, catchment-scale view of water resource management and identify how development of the allocation may positively contribute towards protecting and improving the water environment in line with the Severn River Basin Management Plan (RBMP)<sup>275</sup> <b>and Wye and Severn Vale Catchment Management Plans</b> <small>New web linked footnote - <a href="https://www.gov.uk/government/collections/catchment-flood-management-plans">https://www.gov.uk/government/collections/catchment-flood-management-plans</a></small>.</p>	
MM   67 (New proposed modification)	Appendix 4 ('Economic development' theme of Allocation 01: Land east of Stowe Hill Quarry, page 146)	<p>Revise the Economic development theme for Publication MLP Allocation 01: -</p> <p>An Economic Impact Assessment (EIA) <b>should be carried out</b> will be required to identify potential economic impacts and their significance as a result of further aggregate working at Stowe Hill Quarry. <b>The Whether a dedicated EIA is prepared or related information is to be presented as part of another type of assessment, it</b> must establish whether current local economic conditions are likely to be influenced and the scale and significance of any positive contribution to economic well being at the local, sub-national and national levels, having taken into account the occurrence of possible negative economic impacts. The EIA should be based on a balanced and credible analysis of evidence that has been published and / or has been robustly generated to support the proposal. Information concerning the potential impact on local employment both direct and indirectly will be crucial. The prospect of new jobs being generated should be highlighted. Commitments to secure employment and training</p>	<i>Provides consistency across the MLP allocations and does not affect the HRA Main Report conclusions.</i>

<b>MM Reference</b> (former reference used in Examination document EX5a – Proposed Modifications)	<b>Origin of MM within MLP</b> (paragraph and / or policy location and page no.)	<b>Main Modifications (MMs) brought forward by GCC</b>	<b>HRA Review of Main Modification Outcome</b>
		opportunities that will benefit local communities (e.g. provision of local apprenticeships) will be best placed set out within the EclA. This is in addition to any evidence to show how existing direct and indirect employment will be safeguarded. The possibility that existing non-minerals related local businesses and / or permitted emerging enterprises could be exposed to undue economic risk from further aggregate working at Stowe Hill Quarry must be explored. The nature of any risks to other businesses, their likely significance and any proposed means of mitigation will need to form part of the EclA.	
<b>MM   68</b> (New proposed modification)	Appendix 4 ('Economic development' theme of Allocation 02: Land west of Drybrook Quarry, page 152)	<p>Revise the Economic development theme for Publication MLP Allocation 02: -</p> <p>An Economic Impact Assessment (EclA) <b>should be carried out</b> will be required to identify potential economic impacts and their significance as a result of further aggregate working at Drybrook Quarry. The <b>Whether a dedicated EclA is prepared or related information is to be presented as part of another type of assessment, it</b> must establish whether current local economic conditions are likely to be influenced and the scale and significance of any positive contribution to economic well being at the local, sub-national and national levels, having taken into account the occurrence of possible negative economic impacts. The EclA should be based on a balanced and credible analysis of evidence that has been published and / or has been robustly generated to support the proposal. Information concerning the potential impact on local employment both direct and indirectly will be crucial. The prospect of new jobs being generated should be highlighted. Commitments to secure employment and training opportunities that will benefit local communities (e.g. provision of local apprenticeships) will be best placed set out within the EclA. This is in addition to any evidence that will show how existing direct and indirect employment will be safeguarded. The possibility that existing non-minerals related local businesses and / or permitted emerging enterprises could be exposed to undue economic risk from further aggregate working at Drybrook Quarry must also be explored. The nature of any risks to other businesses, their likely significance and any proposed means of mitigation will need to form part of the EclA.</p>	<i>Provides consistency across the MLP allocations and does not affect the HRA Main Report conclusions.</i>
<b>MM   69</b> (Previously PMM   33)	Appendix 4 ('Water resources' theme of Allocation 02: Land west of Drybrook Quarry, page 153)	<p>Revise the Water resources theme for Publication MLP Allocation 02: -</p> <p>A hydrological / hydrogeological impact assessment in accordance with EA guidance will be required. As the underlying geology of the allocation is classified as a Principal aquifer, attention will need to be given to identifying and quantifying risks associated with all possible minerals-related development activities (e.g. working, processing and site restoration) to groundwater resources and for establishing a stringent monitoring regime commencing at least 12-months prior to development, continuing throughout the operational phase and including site restoration and aftercare. In addition, potential hydrological impacts on nearby surface water</p>	<i>Positive environmental addition that does not affect the HRA Main Report conclusions</i>

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		<p>bodies (within 1km) will require scrutiny. These includes: - Cinderford Brook to Blackpool Brook, Dry Brook, Bailey Brook, Lodgegrove Brook and the quarry lagoons within the existing Drybrook Quarry. Although a more definitive sphere of hydrological influences will need to be established through a Water Features Survey. This could identify other and / or more distant surface water bodies that are also worth assessing along with other relevant receptors. Possible cumulative / incombination hydrological / hydrogeological impacts associated with permitted mineral working and other related activities should also be considered such as proposed restoration and aftercare at the existing Drybrook Quarry. The HIA must scrutinise the need to employ mitigation and where necessary provide a strategy for implementation. It must also incorporate a strategic, catchment-scale view of water resource management and identify how development of the allocation may positively contribute towards protecting and improving the water environment in line with the Severn River Basin Management Plan (RBMP)<sup>281</sup> <u>and Wye and Severn Vale Catchment Management Plans</u>  <small>New web linked footnote -</small>  <a href="https://www.gov.uk/government/collections/catchment-flood-management-plans">https://www.gov.uk/government/collections/catchment-flood-management-plans</a></p>	
MM   70 (New proposed modification)	Appendix 4 ('Economic development' theme of Allocation 03: Depth extension to Stowfield Quarry, page 157)	<p>Revise the Economic development theme for Publication MLP Allocation 03: -</p> <p>An Economic Impact Assessment (EIA) <u>should be carried out</u> will be required to identify potential economic impacts and their significance as a result of further aggregate working at Stowe Hill Quarry. <u>The Whether a dedicated EIA is prepared or related information is to be presented as part of another type of assessment, it</u> must establish whether current local economic conditions are likely to be influenced and the scale and significance of any positive contribution to economic well being at the local, sub-national and national levels, having taken into account the occurrence of possible negative economic impacts. The EIA should be based on a balanced and credible analysis of evidence that has been published and / or has been robustly generated to support the proposal. Information concerning the potential impact on local employment both direct and indirectly will be crucial. The prospect of new jobs being generated should be highlighted. Commitments to secure employment and training opportunities that will benefit local communities (e.g. provision of local apprenticeships) will be best placed set out within the EIA. This is in addition to any evidence to show how existing direct and indirect employment will be safeguarded. The possibility that existing non-minerals related local businesses and / or permitted emerging enterprises could be exposed to undue economic risk from further aggregate working at Stowfield Quarry must be explored. The nature of any risks to other businesses, their likely significance and any proposed means of mitigation will need to form part of the EIA.</p>	<p><i>Provides consistency across the MLP allocations and does not affect the HRA Main Report conclusions.</i></p>
MM   71	Appendix 4	Revise the Water resources theme for Publication MLP Allocation 03: -	<i>Positive environmental addition that does</i>

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(Previously PMM   34)	('Water resources' theme of Allocation 03: Depth extension to Stowfield Quarry, page 159)	<p>A hydrological / hydrogeological impact assessment in accordance with EA guidance will be required. As the underlying geology of the allocation is classified as a Principal aquifer, attention will need to be given to identifying and quantifying risks associated with all possible minerals-related development activities (e.g. working, processing and site restoration) to groundwater resources and for establishing a stringent monitoring regime commencing at least 12-months prior to development, continuing throughout the operational phase and including site restoration and aftercare. In addition, potential hydrological impacts on nearby surface water bodies (within 1km) will require scrutiny. These includes: - Whippington Brook, an unnamed drain, tributary and pond at Swan Pool, and the lagoon within Stowfield Quarry. Although a more definitive sphere of hydrological influences will need to be established through a Water Features Survey. This could identify other and / or more distant surface water bodies that are also worth assessing along with other relevant receptors. Possible cumulative / in-combination hydrological / hydrogeological impacts associated with permitted mineral working and other related activities such as proposed restoration and aftercare at the existing Stowfield Quarry should also be considered. The HIA must scrutinise the need to employ mitigation and where necessary provide a strategy for implementation. It must also incorporate a strategic, catchment-scale view of water resource management and identify how development of the allocation may positively contribute towards protecting and the improving water environment in line with the Severn River Basin Management Plan (RBMP)<sup>286</sup> <b>and Wye and Severn Vale Catchment Management Plans.</b> <small>New web linked Footnote - <a href="https://www.gov.uk/government/collections/catchment-flood-management-plans">https://www.gov.uk/government/collections/catchment-flood-management-plans</a></small></p>	<p><i>not affect the HRA Main Report conclusions</i></p>
MM   72 (New proposed modification)	Appendix 4 ('Economic development' theme of Allocation 04: Land northwest of Daglingworth Quarry, page 162)	<p>Revise the Economic development theme for Publication MLP Allocation 04: -</p> <p>An Economic Impact Assessment (EIA) <b>should be carried out</b> will be required to identify potential economic impacts and their significance as a result of further aggregate working at Daglingworth Quarry. The <b>Whether a dedicated EIA is prepared or related information is to be presented as part of another type of assessment,</b> it must establish whether current local economic conditions are likely to be influenced and the scale and significance of any positive contribution to economic well being at the local, sub-national and national levels, having taken into account the occurrence of possible negative economic impacts. The EIA should be based on a balanced and credible analysis of evidence that has been published and / or has been robustly generated to support the proposal. Information concerning the potential impact on local employment both direct and indirectly will be crucial. The prospect of new jobs being generated should be highlighted. Commitments to secure employment and training opportunities that will benefit local communities (e.g. provision of local apprenticeships) will be</p>	<p><i>Provides consistency across the MLP allocations and does not affect the HRA Main Report conclusions.</i></p>

<b>MM Reference</b> (former reference used in Examination document EX5a – Proposed Modifications)	<b>Origin of MM within MLP</b> (paragraph and / or policy location and page no.)	<b>Main Modifications (MMs) brought forward by GCC</b>	<b>HRA Review of Main Modification Outcome</b>
		best placed set out within the EIA. This is in addition to any evidence which shows how existing direct and indirect employment will be safeguarded. The possibility that existing non-minerals related local businesses and / or permitted emerging enterprises could be exposed to undue economic risk from further aggregate working at Daglingworth Quarry must be explored. The nature of any risks to other businesses, their likely significance and any proposed means of mitigation will need to form part of the EIA.	
<b>MM   73</b> (Previously PMM   35)	Appendix 4 ('Water resources' theme of Allocation 04: Land northwest of Daglingworth Quarry, page 164)	<p>Revise the Water resources theme for Publication MLP Allocation 04: -</p> <p>A hydrological / hydrogeological impact assessment in accordance with EA guidance will be required. As the underlying geology of the allocation is classified as a Principal aquifer, attention will need to be given to identifying and quantifying risks associated with all possible minerals-related development activities (e.g. working, processing and site restoration) to groundwater resources and for establishing a stringent monitoring regime commencing at least 12-months prior to development, continuing throughout the operational phase and including site restoration and aftercare. The allocation also lies within a Source Protection Zone 1 (SPZ1). This will require a very specific risk assessment to be carried out to consider potential pollution of potable water supplies and other sensitive commercial water supplies. Beyond the allocation, potential hydrological impacts on nearby surface water bodies (within 1km) will require scrutiny. These include: - Elkstone Brook and Daglington Stream. Although a more definitive sphere of hydrological influences will need to be established through a Water Features Survey. This could identify other and / or more distant surface water bodies that are also worth assessing along with other relevant receptors. For example, the River Churn is just over 3 km to the South East of the allocation. Possible cumulative / in-combination hydrological / hydrogeological impacts associated with permitted mineral working and other related activities such as proposed restoration and aftercare at the existing Daglingworth Quarry should also be considered. The HIA must scrutinise the need to employ mitigation and where necessary provide a strategy for implementation. It must also incorporate a strategic, catchment-scale view of water resource management by identifying how development of the allocation may positively contribute towards protecting and the improving water environment in line with the Thames River Basin Management Plan (RBMP) and also the Severn RBMP, which covers an area that may be within the sphere of influence of the allocation<sup>291</sup> <b>and Thames Catchment Management Plans</b> <small>New web linked Footnote - <a href="https://www.gov.uk/government/collections/catchment-flood-management-plans">https://www.gov.uk/government/collections/catchment-flood-management-plans</a></small></p>	<i>Positive environmental addition that does not affect the HRA Main Report conclusions</i>
<b>MM   74</b> (Previously PMM   36)	Appendix 4 ('Historic environment including	<p>Revise the final sentence of the historic environment including archaeology theme for Publication MLP Allocation 04: -</p> <p>A Heritage Statement (HS) will be required to establish the presence of heritage assets that</p>	<i>Clarification that does not affect the HRA Main Report conclusions.</i>

MM Reference (former reference used in Examination document EX5a – Proposed Modifications)	Origin of MM within MLP (paragraph and / or policy location and page no.)	Main Modifications (MMs) brought forward by GCC	HRA Review of Main Modification Outcome
	archaeology' theme of Allocation 04: Land northwest of Daglingworth Quarry, page 165)	<p>could be affected and to assess the nature, extent and importance of their significance and their settings. The HS must also provide a detailed analysis of potential impacts and their envisaged significance associated with all activities related to the working of the allocation. Where the potential for adverse impacts is identified, details of the means of avoiding such impacts or delivering sufficient mitigation to eradicate and / or reduce their significance to an acceptable degree must be included. The prime focus should be on the preservation of key heritage assets. A proportionately detailed, reasoned justification will be necessary in every instance that harm to, or the potential loss of a heritage asset is envisaged. Information regarding how recording and / or the excavation of heritage assets may also be necessary. The HS must be comprehensive in its coverage by considering both designated and undesignated heritage assets including those of potential archaeological interest. Information contained on the Gloucestershire Historic Environment Record (G-HER) should be interrogated along with the National Heritage List (NHL) produced by English Heritage. Of potential relevance <u>that could result in restrictions upon future working proposals, to the allocation</u> is the grade II listed milestone (NL list entry: 1090206); <u>a possible Bronze Age barrow; and the linear, and an earthworks that borders the</u> located close to the south eastern boundary <u>of the allocation and forms part of the late Iron Age / early Roman settlement of</u> . Other archaeological features associated with the historic settlement of Bagendon. may need investigation.</p>	
MM   75 (New proposed modification)	Appendix 4 ('Economic development' theme of Allocation 05: Land south and west of Naunton Quarry, page 168)	<p>Revise the Economic development theme for Publication MLP Allocation 05: -</p> <p>An Economic Impact Assessment (EIA) <u>should be carried out</u> will be required to identify potential economic impacts and their significance as a result of further aggregate working at Daglingworth Quarry. The <u>Whether a dedicated EIA is prepared or related information is to be presented as part of another type of assessment, it</u> must establish whether current local economic conditions are likely to be influenced and the scale and significance of any positive contribution to economic well being at the local, sub-national and national levels, having taken into account the occurrence of possible negative economic impacts. The EIA should be based on a balanced and credible analysis of evidence that has been published and / or has been robustly generated to support the proposal. Information concerning the potential impact on local employment both direct and indirectly will be crucial. The prospect of new jobs being generated should be highlighted. Commitments to secure employment and training opportunities that will benefit local communities (e.g. provision of local apprenticeships) will be best placed set out within the EIA. This is in addition to any evidence to show how existing direct and indirect employment will be safeguarded. The possibility that existing non-minerals related local businesses and / or permitted emerging enterprises could be exposed to undue economic risk from further aggregate working at Naunton Quarry must be explored. The nature</p>	<i>Provides consistency across the MLP allocations and does not affect the HRA Main Report conclusions.</i>

<b>MM Reference</b> (former reference used in Examination document EX5a – Proposed Modifications)	<b>Origin of MM within MLP</b> (paragraph and / or policy location and page no.)	<b>Main Modifications (MMs) brought forward by GCC</b>	<b>HRA Review of Main Modification Outcome</b>
		of any risks to other businesses, their likely significance and any proposed means of mitigation will need to form part of the EclA.	
<b>MM   76 (Previously PMM   37)</b>	Appendix 4 ('Water resources' theme of Allocation 05: Land south and west of Naunton Quarry, page 170)	<p>Revise the Water resources theme for Publication MLP Allocation 05:-</p> <p>A hydrological / hydrogeological impact assessment (HIA) in accordance with EA guidance will be required. As the underlying geology of the allocated units has been classified as a Principal aquifer, attention will need to be given to identifying and quantifying risks associated with all possible minerals related development activities (e.g. working, processing and site restoration) to groundwater resources and for establishing a stringent monitoring regime commencing at least 12-months prior to development, continuing throughout the operational phase and including site restoration and aftercare. In addition, potential hydrological impacts on nearby surface water bodies (up to 3km) will require scrutiny. These includes: - the River Windrush, River Eye, several springs feeding an unnamed tributary of the Windrush; and small ponds and a small lake that are linked to existing and previous mineral working at the existing Naunton Quarry. Although a more definitive sphere of hydrological influences will need to be established through a Water Features Survey. This could identify other and / or more distant surface water bodies that are also worth assessing along with other relevant receptors. Possible cumulative / in-combination hydrological / hydrogeological impacts associated with permitted mineral working and other related activities should also be considered such as proposed restoration and aftercare proposals at the existing Naunton Quarry and also the nearby Tinker's Barn Quarry. The HIA must scrutinise the need to employ mitigation and where necessary provide a strategy for implementation. It must also incorporate a strategic, catchment-scale view of water resource management by identifying how development of the allocated units may positively contribute towards protecting and the improving water environment in line with the Thames River Basin Management Plan (RBMP) and the Severn RBMP, which covers an area that may be within the sphere of influence of the allocation<sup>296</sup> <b>and Thames Catchment Management Plans</b> <small>New web linked Footnote - <a href="https://www.gov.uk/government/collections/catchment-flood-management-plans">https://www.gov.uk/government/collections/catchment-flood-management-plans</a></small></p>	<i>Positive environmental addition that does not affect the HRA Main Report conclusions</i>
<b>MM   77 (Previously PMM   38)</b>	Appendix 4 ('Economic development' theme of Allocation 06: Land south east of Down Ampney, page 174)	<p>Revise the Economic development theme for Publication MLP Allocation 06:-</p> <p>An Economic Impact Assessment (EclA) <b>should be carried out</b> will be required to identify potential economic impacts and their significance as a result of aggregate working taking place at land south east of Down Ampney. The <b>Whether a dedicated EclA is prepared or related information is to be presented as part of another type of assessment</b>, it must establish whether current local economic conditions are likely to be influenced and the scale and significance of any positive contribution to economic well-being at the local, sub-national and national levels, having taken into account the occurrence of possible negative economic impacts.</p>	<i>Clarification that does not affect the HRA Main Report conclusions.</i>

<b>MM Reference</b> (former reference used in Examination document EX5a – Proposed Modifications)	<b>Origin of MM within MLP</b> (paragraph and / or policy location and page no.)	<b>Main Modifications (MMs) brought forward by GCC</b>	<b>HRA Review of Main Modification Outcome</b>
		<p>The EclA should be based on a balanced and credible analysis of evidence that has been published and / or has been robustly generated to support the proposal. Information concerning the potential impact on local employment both direct and indirectly will be crucial. The prospect of new jobs being generated should be highlighted. Commitments to secure employment and training opportunities that will benefit local communities (e.g. provision of local apprenticeships) will be best placed set out within the EclA. This is in addition to any evidence to show how existing direct and indirect employment will be safeguarded. The possibility that existing non-minerals related local businesses and / or permitted emerging enterprises could be exposed to undue economic risk from aggregate working starting up at land south east of Down Ampney must be explored. The nature of any risks to other businesses, their likely significance and any proposed means of mitigation will need to form part of the EclA.</p>	
<b>MM   78</b> (Previously PMM   39)	Appendix 4 ('Highways' theme of Allocation 06: Land South east of Down Ampney, page 175)	<p>Revise the 2<sup>nd</sup> sentence and last sentence of the highways theme for Publication MLP Allocation 06: -</p> <p>A Transport Assessment (TA) will be required. Advice on the necessary content of a TA should be sought from the Local Highway Authority, Highways England and also the neighbouring Local Highway Authority for Wiltshire (Wiltshire Council) at the earliest possible opportunity as part of pre-application preparations. Highways matters, which will need to be investigated include: - the creation of a safe and suitable means of vehicular access that will achieve the shortest possible route to the A419; <u>and the avoidance, wherever possible, of associated vehicular movements through</u> the locally significant settlement of Latton; and the establishment of acceptable freight routes using the A419, which do not create a conflict with Gloucestershire Local Transport Plan policies LTP PD 3.1 and LTP PD 3.4, and follow the advice contained within the Gloucestershire Freight Gateway <u>or its future replacement</u>. In addition, where it is relevant, consideration should be given to the Wiltshire Local Transport Plan Freight Strategy. <u>For matters relating to potential impacts on the maintenance of the highway, this is dealt with under s.59 of the Highways Act 1980 and the provision available to recover expenses due to extraordinary traffic.</u></p>	<p><i>Clarification that does not affect the HRA Main Report conclusions.</i></p>
<b>MM   79</b> (Previously PMM   40)	Appendix 4 ('Water resources' theme of Allocation 06: Land South east of Down Ampney, page	<p>Revise the Water resources theme for Publication MLP Allocation 06: -</p> <p>A hydrological / hydrogeological impact assessment in accordance with EA guidance will be required. The superficial deposits of the allocation host a Secondary 'A' shallow aquifer for which little information is known as to its properties. Consequently, a detailed analysis of the existing local groundwater regime will be essential. The assessment must also afford attention to identifying and quantifying groundwater risks associated with all possible minerals-related development activities (e.g. working, processing, site restoration including aftercare) and</p>	<p><i>Clarification and additions that do not affect the HRA Main Report conclusions.</i></p>

MM Reference (former reference used in Examination document EX5a – Proposed Modifications)	Origin of MM within MLP (paragraph and / or policy location and page no.)	Main Modifications (MMs) brought forward by GCC	HRA Review of Main Modification Outcome
	176)	<p>establish a stringent monitoring regime commencing at least 12-months prior to the commencement of the development, continuing throughout the operational phase and including site restoration and aftercare. The allocation mostly lies within a Source Protection Zone 2 (SPZ2) although a small area falls within a Source Protection Zone 1 (SPZ1). A very specific risk assessment will therefore need to be carried out to consider potential pollution of potable water supplies and other sensitive commercial water supplies <u>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.</u> Beyond the allocation, potential hydrological impacts on nearby surface water bodies (up to 3km) will require scrutiny. These include: - Marston Meysey Brook; Ampney and Poulton Brooks; River Thames (from the River Churn to River Coln); River Churn (Baunton to Cricklade); Thames &amp; Severn Canal; a number of unnamed tributaries and drains to the River Thames and Ampney Brook; and several ponds and lakes some of which can be traced back to previous and existing mineral workings in the locality. Although a more definitive sphere of hydrological influences will need to be established through a Water Features Survey. This could identify other and / or more distant surface water bodies that are also worth assessing along with other relevant receptors. Possible cumulative / incombination hydrological / hydrogeological impacts associated with nearby permitted mineral workings and other related activities such as restoration and aftercare should also be considered. This includes: - Whetstone Bridge Quarry and Roundhouse Farm Quarry and Eysey Manor Quarry (the final two are located across the administrative border in Wiltshire). An early up-to-date survey of the status of nearby mineral workings would be beneficial to this exercise. The HIA must scrutinise the need to employ mitigation and where necessary provide a strategy for implementation. It must also incorporate a strategic, catchment-scale view of water resource management by identifying how development of the allocation may positively contribute towards protecting and the improving water environment in line with the Thames River Basin Management Plan (RBMP)<sup>303</sup> <u>and Thames Catchment Management Plans</u> <small>New web linked Footnote - <a href="https://www.gov.uk/government/collections/catchment-flood-management-plans">https://www.gov.uk/government/collections/catchment-flood-management-plans</a></small></p>	
MM   80 (Previously PMM   41)	Appendix 4 ('Natural environment' theme of Allocation 06: Land South east of Down	<p>Revise the natural environment theme for Publication MLP Allocation 06:</p> <p>A comprehensive assessment of the natural environment will be required. This should include those natural assets present in, which rely upon, and / or that are located within the sphere of influence of the allocation. The assessment must identify potential impacts and scrutinise their significance taking into account the different activities / stages of minerals development ((e.g. the preparation of land prior to mineral working, mineral working and processing and</p>	<p><i>Clarifying the current situation as regards an SSSI notification matter and a new name for locally important wildlife sites. These do not involve implications for International / European Sites. Changes do not affect the HRA Main Report conclusions.</i></p>

MM Reference (former reference used in Examination document EX5a – Proposed Modifications)	Origin of MM within MLP (paragraph and / or policy location and page no.)	Main Modifications (MMs) brought forward by GCC	HRA Review of Main Modification Outcome
	Ampney, page 176)	<p>subsequent restoration incorporating aftercare). Environmental designations in the locality that will need careful consideration include: - North Meadow and Clattinger Farm SAC; North Meadow SSSI / NNR; and Down Ampney Pits <del>KLWS</del>. <b>In the event that</b> The re-notification of the Cotswold Water Park SSSI <b>is re-notified</b> for its breeding and overwintering bird assemblages, <b>an assessment</b> should also be assessed <b>carried out</b> to establish whether adverse effects from proposed mineral developments may occur including the disturbance of the important bird assemblages. In addition, any priority habitats and / or priority species, which encompass or have been recorded in, which rely upon, and / or that are located within the sphere of influence of the allocation must be investigated. A further crucial aspect of the assessment will be the provision of sufficient details concerning measures deemed necessary to avoid, reduce, remedy and / or compensate possible unacceptable negative effects. Any scheme of mitigation must also be accompanied by a clear strategy for implementation and be able to demonstrate its deliverability. In totality, the assessment of natural resources must demonstrate how any issues which arise<del>ing</del>, have been considered in a holistic manner and within a strategic context. In particular it must be clear <del>as to how</del> <b>local ecological networks</b> the nearby: Ampney Corridor; Eysey; Cleveland Lakes; and Roundhouse Farm Strategic Nature Areas (SNAs) as expressed upon the Gloucestershire Nature Map will not be subject to unacceptable adverse impacts. Where opportunities exist to deliver tangible benefits, due consideration should be given to possible collaborations and coordination with the programme of nature conservation actions identified for the Cotswold Water Park Nature Improvement Area (NIA).</p>	
MM   81 (Previously PMM   42)	Appendix 4 ('Historic environment – including archaeology' theme of Allocation 06: Land South east of Down Ampney, page 177)	<p>Revise the historic environment theme for Publication MLP Allocation 06:</p> <p>A Heritage Statement (HS) is required to establish the presence of heritage assets that could be affected and to assess the nature, extent and importance of their significance and their settings. The HS must also provide a detailed analysis of potential impacts and their envisaged significance associated with all activities related to the working of the allocation. Where the potential for adverse impacts is identified, details of the means of avoiding such impacts or delivering sufficient mitigation to eradicate and / or reduce their significance to an acceptable degree must be included. <b>This could include limitations on operations including the working of minerals.</b> The prime focus should be on the preservation of key heritage assets. A proportionately detailed, reasoned justification will be necessary in every instance that harm to, or the potential loss of a heritage asset is envisaged. Information regarding how recording and / or the excavation of heritage assets may also be necessary. The HS must be comprehensive in its coverage by considering both designated and undesignated heritage assets including those of potential archaeological interest. Information contained on the Gloucestershire Historic Environment Record (G-HER) should be interrogated along with the National Heritage List (NHL)</p>	<p><i>Extra detail added about potential limitations where heritage assets are present. Change does not affect the HRA Main Report conclusions.</i></p>

<b>MM Reference</b> (former reference used in Examination document EX5a – Proposed Modifications)	<b>Origin of MM within MLP</b> (paragraph and / or policy location and page no.)	<b>Main Modifications (MMs) brought forward by GCC</b>	<b>HRA Review of Main Modification Outcome</b>
		produced by English Heritage. The settlement at Bean Hay Copse Scheduled Monument (NH list entry: 1003446) and several grade II listed buildings at Castle Hill Farm (NH list entries: 1341032 and 1304915) are located near to the boundary of the allocation and will likely require some degree of analysis. There are also numerous records of prehistoric and Roman activity in the locality, which will likely require further investigation. In addition, 20th century military activity within the allocation is very evident and should also be carefully assessed <sup>304</sup> .	
<b>MM   82 (Previously PMM   43)</b>	Appendix 4 ('Aerodrome safeguarding' theme of Allocation 06: Land South east of Down Ampney, page 178)	<p>Revise the aerodrome safeguarding theme for Publication MLP Allocation 06:</p> <p>A Bird Hazard Management Scheme (BHMS) will be required. Advice with respect to its scope and content should be sought at the earliest possible opportunity from Defence Infrastructure Organisation (DIO) Safeguarding. The BHMS should establish the nature, scale and significance of any potential bird hazards associated with all mineral-related activities that support the working of the allocation. Particularly attention will need to be given to the functioning of nearby RAF Fairford due to the location of the allocation within <u>the statutory safeguarding aerodrome height, technical and birdstrike safeguarding consultation zones</u> and an area where Instrumental Landing Systems (ILS) may need to operate. Although, other nearby aerodromes could also require investigation and may need to be taken into account.</p> <p><b><u>Consultation with the DIO will be required if any equipment is proposed that exceeds 15.2 metres in height above ground level.</u></b> Details of the deliverable measures and securable commitments to manage and reduce the frequency and severity of any possible bird hazard risks <b><u>to an acceptable level</u></b> and <b><u>that</u></b> the effective monitoring of their success over time, <b><u>including post- mineral working, restoration and aftercare, should</u></b> <b><u>will likely</u></b> form a major element of the BHMS.</p>	<p><i>Clarifications on bird strike risk consultation, assessment and management in vicinity of airfields (particularly RAF Fairford). Additions do not affect the HRA Main Report conclusions.</i></p>
<b>MM   83 (Previously PMM   44)</b>	Appendix 4 ('Restoration opportunities and constraints' theme of Allocation 06: Land South east of Down Ampney, page 178)	<p>Revise the restoration opportunities and constraints theme for Publication MLP Allocation 06:</p> <p>A restoration strategy will be required. Where necessary, individual proposals must give due consideration to their contribution to the delivery of a coherent and combined solution encompassing the entire allocation. Progressive restoration techniques should be applied unless it is demonstrated and justified to be of greater benefit and / or less harmful to apply alternative arrangements. In developing the overall restoration strategy, evidence must be presented to show how integration can be achieved with the existing local environment. Particular attention must be given to continued aviation safeguarding and the avoidance of any increased risk of bird strike at nearby RAF Fairford <b><u>and / or other nearby aerodromes. This may significantly restrict opportunities to achieve wet restoration, particularly involving the introduction of new open water bodies.</u></b> Where the public rights of way network has been affected by development of the allocation, attention will need to be given to the integration of acceptable long term resolutions</p>	<p><i>Clarifications on bird strike risk consultation, assessment and management in vicinity of airfields (particularly RAF Fairford). Additions do not affect the HRA Main Report conclusions.</i></p>

<b>MM Reference</b> (former reference used in Examination document EX5a – Proposed Modifications)	<b>Origin of MM within MLP</b> (paragraph and / or policy location and page no.)	<b>Main Modifications (MMs) brought forward by GCC</b>	<b>HRA Review of Main Modification Outcome</b>
		<p>such as the reinstatement or permanent re-routing of affected paths. Opportunities to contribute to the ambitions of the nearby Eysey and Ampney Corridor Strategic Nature Areas (SNAs) and the nature conservation actions for the Cotswold Water Park Nature Improvement Area (NIA) should be taken. Consideration should also be given to the possibility of facilitating other beneficial land uses and / or positively contributing to the future management of land as identified in locally applicable plans and strategies such as the Cotswold District Local Plan and the Cotswold Water Park Master Plan. This could, under 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<sup>305</sup>. Furthermore, all proposed restoration solutions must be mindful of climate change and the need to deliver a greater degree of environmental resilience to its envisaged impacts. Under certain conditions this could involve the careful integration of measures to facilitate desirable habitat shifts to take place, which may act as suitable refuges for displaced and / or vulnerable species. An outline aftercare management plan covering at least the 1st five-year post-mineral working period should be incorporated into the overall restoration strategy. This must set out the commitments for carrying out aftercare and for undertaking a more detailed programme up to 12 months prior to the commencement of restoration. It must also contain the direction for future management of any restored areas. A longer timeframe of aftercare may be necessary where nature conservation and informal recreation after-uses are likely to dominate.</p>	
<b>MM   84</b> (New proposed modification)	Appendix 4 ('Economic development' theme of Allocation 07: Land at Lady Lamb Farm, west of Fairford, page 174)	<p>Revise the Economic development theme for Publication MLP Allocation 07:-</p> <p>An Economic Impact Assessment (EIA) <u>should be carried out</u> will be required to identify potential economic impacts and their significance as a result of aggregate working taking place at land at Lady Lamb Farm. The <u>Whether a dedicated EIA is prepared or related information is to be presented as part of another type of assessment, it</u> must establish whether current local economic conditions are likely to be influenced and the scale and significance of any positive contribution to economic well being at the local, sub-national and national levels, having taken into account the occurrence of possible negative economic impacts. The EIA should be based on a balanced and credible analysis of evidence that has been published and / or has been robustly generated to support the proposal. Information concerning the potential impact on local employment both direct and indirectly will be crucial. The prospect of new jobs being generated should be highlighted. Commitments to secure employment and training opportunities that will benefit local communities (e.g. provision of local apprenticeships) will be best placed set out within the EIA. This is in addition to any evidence to show how existing direct and indirect employment will be safeguarded. The possibility that existing non-minerals related local businesses and / or permitted emerging enterprises could be exposed to undue</p>	<p><i>Provides consistency across the MLP allocations and does not affect the HRA Main Report conclusions.</i></p>

<b>MM Reference</b> (former reference used in Examination document EX5a – Proposed Modifications)	<b>Origin of MM within MLP</b> (paragraph and / or policy location and page no.)	<b>Main Modifications (MMs) brought forward by GCC</b>	<b>HRA Review of Main Modification Outcome</b>
		economic risk from aggregate working starting up at land at Lady Lamb Farm must be explored. The nature of any risks to other businesses, their likely significance and any proposed means of mitigation will need to form part of the EClA.	
<b>MM   85</b> (Previously PMM   45)	Appendix 4 ('Water resources' theme of Allocation 07: Land at Lady Lamb Farm, west of Fairford, page 182)	<p>Revise the water resources theme for Publication MLP Allocation 07:</p> <p>A hydrological / hydrogeological impact assessment in accordance with EA guidance will be required. The superficial deposits of the allocation host a Secondary 'A' shallow aquifer for which little information is known as to its properties. Consequently, a detailed analysis of the existing local groundwater regime will be essential. The assessment must also afford attention to identifying and quantifying groundwater risks associated with all possible minerals-related development activities (e.g. working, processing, site restoration including aftercare) and establish a stringent monitoring regime commencing at least 12-months prior to the commencement of the development, continuing throughout the operational phase and including site restoration and aftercare. The allocation also lies within a Source Protection Zone 1 (SPZ1). This will require a very specific risk assessment to be carried out to consider potential pollution of potable water supplies and other sensitive commercial water supplies. Beyond the allocation, possible hydrological impacts on nearby surface water bodies (up to 3km) will require scrutiny. These include: Marston Meysey Brook; Dugrove Brook; River Coln; a network of drains and tributaries to the River Coln; and several ponds and lakes some of which can be traced back to previous mineral workings in the locality. Although a more definitive sphere of hydrological influences will need to be established through a Water Features Survey. This could identify other and / or more distant surface water bodies that are also worth assessing along with other relevant receptors. The HIA must scrutinise the need to employ mitigation and where necessary provide a strategy for implementation. It must also incorporate a strategic, catchment-scale view of water resource management by identifying how development of the allocation may positively contribute towards protecting and the improving water environment in line with the Thames River Basin Management Plan (RBMP)<sup>310</sup> <b>and Thames Catchment Management Plans</b>  <u>New web linked Footnote - <a href="https://www.gov.uk/government/collections/catchment-flood-management-plans">https://www.gov.uk/government/collections/catchment-flood-management-plans</a></u></p>	<i>Positive environmental addition that does not affect the HRA Main Report conclusions</i>
<b>MM   86</b> (Previously PMM   46)	Appendix 4 ('Aerodrome safeguarding' theme of Allocation 07: Land at Lady Lamb Farm, west of Fairford, page	<p>Revise the aerodrome safeguarding theme for Publication MLP Allocation 07:</p> <p>A Bird Hazard Management Scheme (BHMS) will be required. Advice with respect to its scope and content should ideally be sought at the earliest possible opportunity from Defence Infrastructure Organisation (DIO) Safeguarding. The BHMS should establish the nature, scale and significance of any potential bird hazards associated with all mineral-related activities that support the working of the allocation. Particularly attention will need to be given to the functioning of nearby RAF Fairford due to the location of the allocation within <del>at the</del> statutory</p>	<i>Clarifications on bird strike risk consultation, assessment and management in vicinity of airfields (particularly RAF Fairford). Additions do not affect the HRA Main Report conclusions.</i>

<b>MM Reference</b> (former reference used in Examination document EX5a – Proposed Modifications)	<b>Origin of MM within MLP</b> (paragraph and / or policy location and page no.)	<b>Main Modifications (MMs) brought forward by GCC</b>	<b>HRA Review of Main Modification Outcome</b>
	183)	<p><b>safeguarding aerodrome height, technical and b</b>irdstrike <b>safeguarding consultation</b> zones and an area where Instrumental Landing Systems (ILS) may need to operate. <b>Consultation with the DIO will be required if any equipment is proposed that exceeds 15.2 metres in height above ground level.</b> Although, other nearby aerodromes could require investigation and may need to be taken into account. Details of the deliverable measures and securable commitments to manage and reduce the frequency and severity of any possible bird hazard risks <b>to an acceptable level</b> and the <b>that</b> effective monitoring of their success over time, <b>including post-mineral working, restoration and aftercare, should</b> will likely form a major element of the BHMS.</p>	
MM   87 (Previously PMM   47)	Appendix 4 ('Restoration opportunities and constraints' theme of Allocation 07: Land at Lady Lamb Farm, west of Fairford, page 184)	<p>Revise the restoration opportunities and constraints theme for Publication MLP Allocation 07: A restoration strategy will be required. Where necessary, individual proposals must give due consideration to their contribution to the delivery of a coherent and combined solution encompassing the entire allocation. Progressive restoration techniques should be applied unless it can be demonstrated and justified to be of greater benefit and / or less harmful to apply alternative arrangements. In developing the overall restoration strategy, evidence must be presented to show how compatibility and wherever possible, integration can be achieved with the existing local environment. Particular attention must be given to continued aviation safeguarding and the avoidance of increased risk of bird strike at nearby RAF Fairford- <b>and / or other nearby aerodromes. This may significantly restrict opportunities to achieve wet restoration, particularly involving the introduction of new open water bodies.</b> Where the public rights of way network has been affected by development of the allocation, attention will need to be given to the integration of acceptable long term resolutions such as the reinstatement or permanent re-routing of affected paths. Opportunities to contribute to the ambitions of the nearby Bibury and Coln Corridor Strategic Nature Areas (SNAs) and the nature conservation actions for the Cotswold Water Park Nature Improvement Area (NIA) should be taken. Consideration should also be given to the possibility of facilitating other beneficial land uses and / or positively contributing to the future management of land as identified in locally applicable plans and strategies such as the Fairford Neighbourhood Plan, Cotswold District Local Plan and the Cotswold Water Park Master Plan. Furthermore, all proposed restoration solutions must be mindful of climate change and the need to deliver a greater degree of environmental resilience to its envisaged impacts. Under certain conditions this could involve the careful integration of measures to facilitate desirable habitat shifts to take place, which may act as suitable refuges for displaced and / or vulnerable species. An outline aftercare management plan covering at least the 1st five-year post-mineral working period should be incorporated into</p>	<p><i>Clarifications on bird strike risk consultation, assessment and management in vicinity of airfields (particularly RAF Fairford). Additions do not affect the HRA Main Report conclusions.</i></p>

<b>MM Reference</b> (former reference used in Examination document EX5a – Proposed Modifications)	<b>Origin of MM within MLP</b> (paragraph and / or policy location and page no.)	<b>Main Modifications (MMs) brought forward by GCC</b>	<b>HRA Review of Main Modification Outcome</b>																																																																				
		<p>the overall restoration strategy. This must set out the commitments for the carrying out aftercare and for undertaking a more detailed programme up to 12 months prior to the commencement of restoration. It must also contain the direction for future management of any restored areas. A longer timeframe of aftercare may be necessary where nature conservation and informal recreation after-uses are likely to dominate.</p>																																																																					
<b>MM   88</b> (Previously PMM   48)	New Appendix 5, after page 184	<p>Insert a new appendix into the Publication MLP that contains a schedule of the existing 'saved' policies that would be replaced: -</p> <table border="1" data-bbox="586 616 1612 1510"> <thead> <tr> <th data-bbox="586 616 676 700">Policy</th><th data-bbox="676 616 938 700">Title</th><th data-bbox="938 616 1253 700">Status (i.e saved or not saved under transitional arrangements)</th><th data-bbox="1253 616 1612 700">Proposed Action</th></tr> </thead> <tbody> <tr> <td data-bbox="586 700 676 747">E1</td><td data-bbox="676 700 938 747">International and European Sites of Nature Conservation</td><td data-bbox="938 700 1253 747">Not Saved</td><td data-bbox="1253 700 1612 747">Replaced by Policy DM06   Biodiversity and Geodiversity</td></tr> <tr> <td data-bbox="586 747 676 795">E2</td><td data-bbox="676 747 938 795">Areas of Outstanding Natural Beauty</td><td data-bbox="938 747 1253 795">Saved</td><td data-bbox="1253 747 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Policy DM06   Biodiversity and Geodiversity	E11	Protection of the Water Environment	Saved	Replaced by Policy DM05   Water resources	E12	Flood Risk/Flood Plain Development	Not Saved	Replaced by Policy DM04   Flood risk	E13	Riparian Buffer Zones	Saved	Replaced by a combination of Policy DM04   Flood risk and Policy DM05   Water resources	E14	Protecting the Local Environment – County-Wide	Saved	Replaced by DM01   Amenity, DM02   Cumulative impact and DM09   Landscape	E15	Protecting the Local Environment – Cotswolds Water Park	Saved	Replaced by DM01   Amenity, DM02   Cumulative impact, and DM09   Landscape	E16	Economic Development	Saved	Replaced by DM01   Amenity and DM02	<p><i>Addition and clarification on saved policies that the MLP would replace. New appendix does not affect the HRA Main Report conclusions.</i></p>
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## 2 HRA CONCLUSIONS

The HRA has been an iterative process working alongside the local plan preparation process and has informed the contents of the final version of the Minerals Local Plan for Gloucestershire 2018 – 2032. This addendum presents a review of the Main Modifications to the Minerals Local Plan for Gloucestershire 2018 – 2032 to see if there is continued compliance with the requirements of the Habitats Regulations and Directive 92/43/EEC.

It is concluded by Gloucestershire County Council as Mineral Planning Authority that a modification version of the Minerals Local Plan for Gloucestershire 2018 – 2032 does not introduce changes that could have a likely significant effect on any International / European Site alone or in combination with other plans or projects. The HRA Main Report<sup>7</sup> conclusions are still valid. The HRA of the Minerals Local Plan for Gloucestershire 2018 – 2032 is now considered to be complete.

July 2019

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<sup>7</sup> To be found currently at <https://www.goucestershire.gov.uk/planning-and-environment/planning-policy/minerals-local-plan-for-goucestershire/evidence-base-for-the-minerals-local-plan-for-goucestershire/>