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11 October 2020

By email only to: planningdc@gloucestershire.gov.uk

Dear Linda,

20/0030/CWMAJW - Proposed increase in importation of waste for feedstock for the existing Anaerobic Digester Plant from 70,000 tonnes up to 120,000 tonnes annually - Stanleys Quarry, Greenway Road, Blockley

Thank you for consulting the Cotswolds Conservation Board on the above planning application, for which the proposed development is located in the Cotswolds Area of Outstanding Natural Beauty (AONB).¹

The Cotswolds Conservation Board acknowledges that the anaerobic digester waste facility is already in operation at Stanleys Quarry. We also acknowledge that the proposed development would represent an expansion of that existing operation, in terms of the amount of waste that is to be imported, rather than creating a new waste facility.

However, for the reasons outlined below, we consider that that the proposed expansion should, itself, be classed as major development, in the context of paragraph 172 of the National Planning Policy Framework (NPPF). We do not consider that exceptional circumstances apply or that the development would be in the public interest. As such, we recommend that planning permission should be refused.

Nature and scale of the proposed development

The planning application proposes increasing the amount of waste to be imported from 70,000 tonnes per annum (tpa) up to 120,000tpa – an increase of 50,000tpa. It is worth noting that the planning application also refers to a potentially increasing the amount of waste to be imported up to 150,000tpa, which would be an increase of 80,000tpa compared to the current limit (i.e. more than

¹ The Cotswolds Area of Outstanding Natural Beauty (AONB) has a new name – the Cotswolds National Landscape. This reflects one of the proposals of the Government-commissioned Landscapes Review, for AONBs to be renamed 'National Landscapes'. However, given that 'Conservation Board' and 'AONB' are still the legislative and national and local planning policy acronyms, this is the terminology that is used in this planning application consultation response.

Cotswolds Conservation Board

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The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty (AONB), managed and looked after by the Cotswolds Conservation Board.

cotswoldsaonb.org.uk

Chairman:
Brendan McCarthy

Vice Chair:
Rebecca Charley

double). However, for the purposes of this response, it is assumed that the relevant maximum would be 120,000tpa.

Core Policy WCS5 of the Gloucestershire Waste Core Strategy (WCS) defines anaerobic digestion schemes >50,000tpa to be 'strategic' in scale. It states that such strategic scale waste operations should be located in what the WCS calls 'Zone C' (which is the area between the AONB boundary and the Severn / Avon floodplain). In addition, Policy CE13 of the Cotswolds AONB Management Plan states that '*proposals for ... strategic waste facilities should not normally be permitted*'.

Given that the proposal would increase the amount of waste to be imported by 50,000tpa, we consider that this increase is, itself, strategic in scale. For this reason, the Board considers that the proposal should be classed as major development in terms of both its nature and scale.

The applicant has not adequately addressed the assessments that the NPPF specifies for such major development. For example, the applicant has not demonstrated that there would not be scope for this quantity of waste to be dealt with outside the AONB.

Potential for significant adverse impacts on the purpose of AONB designation - tranquillity

The Board is concerned about the increase in HGV movements, compared to the current baseline, associated with the proposed development. For example, the Board's calculations (see attached Excel spreadsheet) show that HGV movements to / from the quarry would potentially increase by 38%, compared to the current baseline.

As outlined below, we consider that the proposed development should be considered to be major development in this regard because of the significant adverse impact that it would have on the tranquillity of the AONB (which is one of the factors that contributes to the AONB's natural beauty).

The Board acknowledges that the total % increase in HGV movements on the adjacent B4081 could potentially be less than this 38% figure, given that there may also be some HGV movements associated with Westington Quarry on this section of the B4081. However, in the absence of a comprehensive assessment by the applicant of total HGV movements on the B4081, this 38% figure is the most useful reference point.

The Board's Tranquillity Position Statement² states that that an increase in HGV movements on local roads of 10% or more should be considered significant. Such an increase would have a significant adverse impact on the tranquillity of the AONB and would potentially merit an Environmental Impact Assessment (EIA). In this context, an increase of 38% is likely to have a very significant impact on the tranquillity of the AONB in this locality.

In addition to the tranquillity of the AONB being one of the factors that contributes to the area's natural beauty, it is also one of the 'special qualities' of the AONB. As such, it is: (i) one of the aspects of the area's natural beauty which makes the area distinctive and valuable at a national scale; and (ii) one of the key attributes on which the priorities for the conservation, enhancement and management of the AONB should be based.

In addition, Policy CE4 of the Cotswolds AONB Management Plan³ seeks to avoid and minimise new sources of noise pollution and other aural and visual disturbance and to remove and reduce existing sources of such pollution and disturbance.

² <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/06/Tranquillity-Position-Statement-FINAL-June-2019.pdf>

³ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/12/Management-Plan-2018-23.pdf>

The Board acknowledges that the total number of HGV movements related to the Stanleys Quarry has decreased since the traffic assessment that was carried out in 2014 (as indicate in Tables 1 and 2 of the applicant's Transport Appraisal). However, we do not accept that the current proposal should simply be assessed against that 2014 baseline. We consider that the current baseline is equally, if not more, important.

Given that HGV movements have decreased over recent years, it follows that the tranquillity of the AONB in this locality will have improved. It would be a retrograde step to now substantially increase HGV movements compared to the current baseline and, as a result, reduce the tranquillity of the AONB in this locality. Such an increase would also be contrary to Policy CE4 of the Cotswolds AONB Management Plan.

Also, it is worth noting that, at the time of the 2014 appraisal, HGV movements associated with the anaerobic digester plant formed a relatively small proportion of the overall HGV movements associated with Stanleys Quarry. In comparison, the HGV movements associated with the anaerobic digester plant now constitute by far the largest proportion of HGV movement associated with Stanleys Quarry. This increases the significance of the HGV movements associated with the anaerobic digester plant.

If you have any queries regarding this response please do not hesitate to get in touch.

Yours sincerely,

A handwritten signature in black ink that reads "John Mills". The signature is written in a cursive style with a long, sweeping underline.

John Mills
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