

4th March 2020

Minerals & Waste Policy Team
Oxfordshire County Council
County Hall
Oxford OX1 1ND

By email only to mineralsandwasteplanconsultation@oxfordshire.gov.uk

Dear Sir / Madam



OXFORDSHIRE MINERALS & WASTE LOCAL PLAN PART 2 – SITE ALLOCATIONS – PREFERRED OPTIONS

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the Preferred Options consultation for the Oxfordshire Minerals & Waste Local Plan Part 2 – Site Allocations.

The Board is pleased to see the consideration that has been given to the Cotswolds Area of Outstanding Natural Beauty (AONB) in the assessments of the potential site allocations. The Board acknowledges that the Preferred Options consultation does not propose any minerals or waste site allocations in the AONB.

However, we do have some concerns about Policy SP6 (Whitehall Quarry, Burford (Site 026)), which is located adjacent to the AONB boundary, on the south side of the A40, approximately 2km east of Burford. In particular, we are concerned about the potential impacts of the proposed allocation on the relative tranquillity of the Cotswolds AONB, which is one of the AONB's 'special qualities'. These potential impacts include:

- (i) the potential increase in HGV movements in the Cotswolds AONB resulting from the proposed development;
- (ii) the potential noise and light pollution arising from the proposed development, particularly in relation to recreational users of the Windrush Valley in the Cotswolds AONB.

Neither of these issues appear to have been explicitly addressed in the assessments that have been undertaken to-date.

The Board recommends that, in order to address these issues, any planning application for this site should be required to demonstrate that the development:

- would not increase HGV movements in – or directly adjacent to - the AONB (including at the A361 roundabout, Burford High Street, the A40 west of Burford and the A419) by more than 10%.
- would not increase levels of noise pollution and light pollution in the Cotswolds AONB, in particular in the Windrush Valley.

The principle about increased HGV movements in the AONB also applies to other minerals and waste allocations that are in relatively close proximity to the Cotswolds AONB.

Further information relating to these issues and these recommendations is provided in Annex 1.

Conserving, enhancing, understanding and enjoying the Cotswolds Area of Outstanding Natural Beauty

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Yours faithfully,

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

John Mills MRTPI
Planning and Landscape Officer

ANNEX 1. SUPPORTING INFORMATION FOR THE RESPONSE OF THE COTSWOLDS CONSERVATION BOARD TO THE OXFORDSHIRE MINERALS & WASTE LOCAL PLAN PART 2 – SITE ALLOCATIONS – PREFERRED OPTIONS

The relative tranquillity of the Cotswolds AONB

The tranquillity of the Cotswolds Area of Outstanding Natural Beauty (AONB) - away from major sources of inappropriate noise, development, visual clutter and pollution – is one of the AONB's 'special qualities'. In other words, it is one of the features of the Cotswolds that makes the area so outstanding that it is in the nation's interest to safeguard it. Tranquillity is also one of the factors that contributes to the natural beauty of the AONB. As such, it should be a key consideration for local authorities in relation to their statutory duty to have regard to the purpose of AONB designation. Tranquillity is an integral component of the landscape and scenic beauty of the AONB. As such, great weight should be given to conserving and enhancing this tranquillity.

Further information and recommendations on the issue of tranquillity are provided in the Board's Tranquillity Position Statement.¹

Tranquillity – potential impact of HGV movements

The potential impacts of HGV movements on the tranquillity of the Cotswolds AONB are addressed in Section 4.5 of the Board's Tranquillity Position Statement. This states that the Institute of Environmental Assessment's '*Guidelines for the Environmental Assessment of Road Traffic*' recommends using two 'rules of thumb' for identifying the scale at which increases in traffic movements should be considered in an Environmental Impact Assessment (EIA).

- Rule 1: Where traffic flows will increase by more than 30% (or the number of heavy goods vehicles (HGVs) will increase by more than 30%).
- Rule 2: Any other sensitive areas where traffic flows have increased by 10% or more.

AONBs are specifically identified as 'sensitive areas' in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. As such, Rule 2 should be applied in the Cotswolds AONB and should relate to both traffic flows and HGV numbers. On this basis, it can be argued that an increase in traffic flows - or HGV numbers - of more than 10% is likely to be significant and have an adverse impact on the tranquillity of the Cotswolds AONB. However, there may be circumstances where a lower threshold would be appropriate, for example, where there is a particularly high landscape – or historic - sensitivity or where impacts on tranquillity are already significant, including cumulative impacts.

The Board recommends that where a development is likely to increase traffic flows – or increase the number of heavy goods vehicles – by 10% or more, this should be considered significant. Such development proposals should require a Transport Assessment and, where appropriate, a Transport Plan and / or an Environmental Impact Assessment (EIA). Any such assessment should include consideration of relevant locations in the AONB but outside the development site

¹ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/06/Tranquillity-Position-Statement-FINAL-June-2019.pdf>

Tranquillity – potential impacts of noise pollution

Policy CE4 (Tranquillity) of the Cotswolds AONB Management Plan 2018-2023 states that:

- Proposals that are likely to impact on the tranquillity of the Cotswolds AONB should have regard to this tranquillity, by seeking to (i) avoid and (ii) minimise noise pollution and other aural and visual disturbance.

In the context of the Whitehall Quarry allocation, this means ensuring that any associated development (i) avoids and (ii) minimise noise pollution in the Cotswolds AONB. In particular, development should not increase noise levels for recreational users in the Windrush Valley. This includes users of the bridleway on the opposite side of the A40 from Windrush Quarry (which extends to Widford), National Cycle Route 57 and the other public rights of way in the Windrush Valley.

Tranquillity – potential impacts of light pollution

The dark skies of the Cotswolds AONB are an integral component of the AONB's tranquillity and a 'special quality' of the AONB in their own right. Policy CE5 (Dark Skies) of the Cotswolds AONB Management Plan 2018-2023 states that:

- Proposals that are likely to impact on the dark skies of the Cotswolds AONB should have regard to these dark skies, by seeking to (i) avoid and (ii) minimise light pollution.

In the context of the Whitehall Quarry allocation, this means ensuring that any associated development (i) avoids and (ii) minimises light pollution in the Cotswolds AONB. In order to achieve this, it is likely that the operational hours will need to be restricted during hours of darkness.