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By email only to: emma.bolster@oxfordshire.gov.uk

27 October 2020

Dear Emma

APPLICATION NO: MW.0149/18

DESCRIPTION: To continue the development permitted under permission 07/1777/P/CM without complying with conditions 1 and 10, to increase the number of HGV movements via the access onto the C115 highway and to bring forward planned restoration to 31 December 2030

LOCATION: Rollright Quarry, Little Rollright, Chipping Norton, Oxfordshire

Thank you for consulting the Cotswolds Conservation Board ('the Board') on the additional information that has been provided by the applicant with regards to planning application MW.0149/18 at Rollright Quarry, which is located within the Cotswolds National Landscape.¹

As you will be aware, the Board has previously objected to this planning application, in a consultation response that we submitted on 11 June 2019.

The Board has now reviewed the further information provided by the applicant. We acknowledge that this information touches on some of the issues that we raised in our consultation response, albeit not directly. However, it falls well short of fully addressing the recommendations that we made in our 2019 response. As such, we maintain our objection and continue to recommend that planning permission should be refused.

The potential adverse impacts of the proposed increase in HGV movements on the Rollright Stones adds further weight to the Board's position, as outlined below.

The Board's response is grouped under three headings:

1. Comments on the further information provided by the applicant.
2. Issues and recommendations from the Board's 2019 response that have still not been addressed.
3. Additional issues.

¹ Cotswolds National Landscape is the new name for the Cotswolds Areas of Outstanding Natural Beauty (AONB). This new name takes forward one of the proposals of the Government-commissioned 'Landscapes Review' to rename AONBs as 'National Landscapes'. This change reflects the national importance of AONBs and the fact that they are safeguarded, in the national interest, for nature, people, business and culture.

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

Comments on the further information provided by the applicant

The further information provided by the applicant indicates that the proposed increase in HGV movements would equate to an overall anticipated increase of 7-8% of all traffic within the wider area. However, the applicant has not clarified the anticipated % increase in HGV movements in the wider area. Given that the 7-8% increase relates to *all* traffic, including cars, then the % increase in HGV movements is likely to be significantly higher.

As outlined in the Board's Tranquillity Position Statement², which the Board adopted shortly after our previous consultation response was submitted, if a proposed development would result in HGV movements on local roads increasing by 10% or more, then this should be considered to be a significant increase. Such an increase would be likely to have a significant adverse effect on tranquillity of the Cotswolds National Landscape.

The further information provided by the applicant relating to the total length of the Shakespeare's Way and Macmillan Way long distance footpaths is completely irrelevant. The key issue in relation to these footpaths is that the users of these footpaths, particularly the Shakespeare's Way, would have to walk along the section of road for which the increase in HGV movements will be most significant. The proposed increase in HGV movements is not compatible with the quiet enjoyment of these popular footpaths. Furthermore, the increase in HGV movements is likely to mean that more HGVs would need to pull up onto the road verges along this lane, in order to avoid pedestrians and other road users, which would further erode these road verges.

The further information provided by the applicant asserts that quarrying activity is '*characteristic of the area and contributes to the perception of a living and working landscape with the Cotswolds AONB*'. The Board acknowledges that '*occasional active and disused limestone quarries*' are identified as a 'key feature' of the High Wold Landscape Character Type (LCT)). However, this does not mean that an intensification of quarrying activities at this site would be appropriate or compatible with the purpose of AONB designation, which is to conserve and enhance the natural beauty of the area. On the contrary, it is likely that the proposed intensification would have a significant adverse effect on this statutory purpose.

Even if planning permission was refused, quarrying would still continue, albeit at a lower intensity, so such activity would still remain a feature of this '*living and working landscape*' for the time being. As such, it is not appropriate for the applicant to use this '*living and working landscape*' argument as justification for planning permission being granted.

For the reasons outlined above, we strongly disagree with the applicant's assertion that the proposed increase in HGV movements '*raises no significant adverse impact upon the landscape and visual character of the immediate or wider area*'.

Issues and recommendations from the Board's 2019 response that have still not been addressed

As outlined above, the applicant has not identified the % increase in HGV movements on local roads that would result from the proposed increase in HGV movements at the quarry. This is a crucial consideration given that an increase of 10% or more should be considered significant (as outlined in the Board's Tranquillity Position Statement). Furthermore, the applicant has not identified the likely distribution of HGVs on local roads.

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

In addition, the applicant has not addressed the Board's recommendation that the restoration of the quarry should focus on the creation of species-rich limestone grassland.

Finally, the further information provided by the applicant has not provided justification for why:

1. works would have to recommence in Phase 1 before works cease in Phase 2 (i.e. before December 2021);
2. output would have to be almost doubled (across the whole site), from 60 HGV movements per day to 114 HGV movements per day, in the period up to December 2021;
3. higher output levels would need to be maintained after works cease in Phase 2.

Further details relating to these points are provided in our 2019 consultation response.

Additional issues

In the Board's previous consultation response, we did not address the potentially significant adverse effects of the proposed increase in HGV movements at Rollright Quarry on the scheduled monuments of the Rollright Stones complex. This was a significant oversight on our part.

The Rollright Stones are a hugely significant asset in the Cotswolds National Landscape's historic environment and cultural heritage. As such, they are also a significant component of the natural beauty of the National Landscape.

Existing traffic levels are already a cause for concern in relation to the Rollright Stones, in terms of the potential adverse impacts on:

- the scheduled monuments themselves (for example, as a result of vibration associated with HGV movements); and
- the safety of visitors and the way in which they can experience, enjoy and appreciate the Rollright Stones.

The proposed increase in HGV movements at Rollright Quarry would further exacerbate these issues on what is already a dangerous and, at times, congested stretch of road. Given the significance of the Rollright Stones and the existing traffic problems in this location, it could potentially be argued that the 'significance' threshold for the increase in HGV movements should actually be less than the 10% 'rule of thumb' threshold specified in the Board's Tranquillity Position Statement.

The national significance of this issue is demonstrated by the fact that nearly 32,000 people from all over the UK signed a petition for traffic calming measures to be implemented at the Rollright Stones.

The Board considers that this issue adds further weight to its objection to the planning application.

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
Planning & Landscape Lead
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