

31 July 2020

Matthew Williams
Case Officer
Warwickshire County Council

By email only to matthewwilliams@warwickshire.gov.uk

Dear Matthew



PLANNING APPLICATION: SDC/20CM009

LOCATION: Edgehill Quarry, Edgehill, Banbury, OX15 6DH

PROPOSAL: Infilling of redundant quarry with inert soils and clays to include temporary soils and aggregates recycling and recovery facility and restoration of the quarry to provide 4 No. affordable dwellings and 10 No. Recreational EcoPods.

Thank you for consulting the Cotswolds Conservation Board on the above planning application.

The Board objects to the proposed development for the reasons outlined below.

The Board acknowledges that the applicant has taken some steps to reduce the potential adverse impacts of the proposed development, compared to the previous, withdrawn planning application (SC/19CM023). However, we consider that the planning application should be considered on its own merits, rather than in comparison to the previous planning application.

Whilst the Board acknowledges some of the potential benefits of the proposed development, we consider that the nature and scale of the proposed landfill and waste processing operation is completely inappropriate in the highly sensitive landscape of the Cotswolds Area of Outstanding Natural Beauty (AONB).

The Board's own analysis of the information submitted by the applicant shows that the amount of waste required to be imported to the site (and the amount of material that would be exported from the site) is actually 20% more than the figures provided by the applicant. For example, we have identified that the site would need to import an average of 53,125 tonnes per annum. This would bring the operation above the threshold for 'large scale waste sites', as defined in the Warwickshire Waste Core Strategy.

The Board also considers that the landfill and waste processing operation is likely to have a significant adverse impact on the statutory purpose of AONB designation, which is to conserve and enhance the natural beauty of the AONB. In particular, we consider that the operation is likely to have a significant adverse impact on the relative tranquillity of the AONB, which is one of the AONB's 'special qualities'.

This impact on tranquillity primarily relates to the large number of – and significant increase in – HGV movements that would be required for the landfill and waste processing operation for over a decade. For example, the Board's analysis indicates that there would be a nearly 900% (or nine-fold) increase in HGV movements compared to the current baseline (based on the HGV movements permitted with the existing planning permission). Given that this site is likely to be the only source of HGV movements on the minor roads adjacent to the site, these minor roads are likely to experience a similar percentage increase in HGV movements. To put this increase in perspective, a 900% increase is 90 times larger than the 10% threshold identified in the Board's Tranquillity Position Statement.

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

Cotswolds Conservation Board Fosse Way Northleach Gloucestershire GL54 3JH

Tel: 01451 862000 Fax: 01451 862001 Email: info@cotswoldsaonb.org.uk

Website: www.cotswoldsaonb.org.uk

Given the inappropriate nature and scale of the proposed development, the high sensitivity of the setting and the potential for significant adverse impacts on the purpose of AONB designation, the Board considers the proposed development to be major development, in the context of paragraph 172 and footnote 55 of the National Planning Policy Framework (NPPF). This is further justified by the fact that the dual purpose of the proposed development (i.e. the combination of landfill / waste operation and housing / holiday development) adds a high level of complexity to the assessment of the proposal and to the decision-making process

For major development, in this context, the starting point for the decision-making process should be a presumption against granting planning permission. Granting planning permission should only be considered if exceptional circumstances are considered to apply *and* if the development would be in the public interest. However, the Board does not consider that the applicant has adequately demonstrated:

- (i) the need for the proposed development;
- (ii) that there are no suitable, alternative locations for the landfill and waste processing operation outside the AONB; or
- (iii) that the need for the landfill and waste processing operation could not be met in some other way.

We also consider that the adverse effects of the proposed development significantly outweigh the potential beneficial effects.

Based on the points outlined above, we do not consider that exceptional circumstances apply or that the development would be in the public interest. Any public interest that the development may have would need to be weighed against the fact that AONBs are landscapes whose distinctive character and natural beauty are so outstanding that it is in the nation's interest to safeguard them. It is also important to note that the NPPF affords the highest level of protection to AONBs, on par with the level of protection afforded to national parks.

The Board acknowledges that restoring the pre-quarrying landform does have some potential benefits. However, it should be recognised that disused quarries are a key feature / characteristic of the High Wold landscape in which the site is located. So, whilst, from a landscape perspective, it may have been preferable if the land had not been quarried in the first place, this does not necessarily mean that the original landform should be restored post-quarrying. This is particularly true where restoring the proposed landform has not been an integral part of the mineral operation, as is the case with this site.

In particular, it is important to note that unfilled quarries have the potential to provide a valuable wildlife resource in their own right. Indeed, whereas the biodiversity of quarry sites where the original landform has been restored might be compromised by competing land uses such as farming, housing or tourism, unfilled quarries can provide a haven for rare habitats and species. For example, many of the country's important limestone grassland sites are found on former, unfilled quarries that are surrounded by more intensive land uses.

The Board acknowledges that, in this instance, the proposed restoration does have potential to deliver biodiversity net-gain, compared to the current baseline. However, with an appropriate restoration and aftercare scheme, significant gains for biodiversity could also be achieved in the unfilled quarry. Indeed, the Board's recommendation would be that the site should not be filled in and that, instead, it should be restored to primarily lowland calcareous grassland habitat. Restoring the site in this way would make a significant contribution to halting and reversing ongoing declines in this nationally important habitat which is so iconic

for the Cotswolds AONB. The restoration should also include an element of Open Mosaic Habitat on Previously Developed Land.

For the reasons outlined above, the Board does not consider that importing hundreds of thousands of tonnes of waste into the AONB and either landfilling it or re-exporting the processed material is justified in terms of: waste management; conserving and enhancing the natural beauty of the AONB; or delivering four dwellings and / or tourism accommodation in this locality.

In addition, the Board recommends that further assessments should be carried out to assess:

- the % increase in HGV movements on local roads and through local settlements
- if the lighting during the operational and after-use phases complies with the obtrusive light limitations specified by the Institution of Professional Lighting Professionals.

Without prejudice, if planning permission is granted, the Board recommends that conditions should be imposed to limit the amount of waste that can be imported / exported each year and the number of HGV movements per year (and, potentially, for shorter timescales). Limitations should also be imposed on the hours of operation for the landfill and waste processing operation, preferably not to include Saturdays. We also recommend that conditions should be imposed to ensure that the proposed dwellings reflect the local vernacular architecture, in addition to using Horton Stone cladding.

Additional, supporting information is provided in Annexes 1-3, below.

If you have any queries regarding the Board's 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 MRTPI
Planning and Landscape Officer

Tel: 07808 391227

Email: john.mills@cotswoldsaonb.org.uk

ANNEX 1. SUPPORTING INFORMATION RELATING TO THE COTSWOLDS CONSERVATION BOARD'S OBJECTION TO PLANNING APPLICATION SDC/20CM009 MAJOR DEVELOPMENT

As outlined in the covering letter, the Board considers that the proposed development constitutes major development, in the context of paragraph 172 and footnote 55 of the National Planning Policy Framework.

The Board acknowledges that the waste planning authority (WPA), Warwickshire County Council, did not consider that the proposed development required an Environmental Impact Assessment (EIA). In other words, they did not consider the proposed development was likely to have significant adverse effects on the environment. However, the Board would argue that the development is, in fact, likely to have significant adverse effects, as outlined elsewhere in this response.

Also, it is important to note that the threshold for major development is lower than that for an EIA. For an EIA to be required it would have to be *likely* that there would be significant adverse effects. For major development, on the other hand, there only needs to be the *potential* for significant adverse effects.

The Board would certainly consider that the proposed development is above this major development threshold.

A brief outline of the Board's considerations in this regard is provided below. A tabulated summary is also provided in Annex 2.

Nature and scale of the proposed

Amount of material

The applicant has identified that the void space that needs to be filled is 340,000 cubic metres and that filling this void would require 510,000 tonnes (t) of waste material. The applicant has also identified that approximately 20% of this imported material would be re-exported once it had been processed. However, re-exporting 20% of the 510,000t required for infilling would leave a 20% shortfall in the infill material. The applicant does not appear to have accounted for this shortfall.

In order to provide 510,000t for infilling, whilst also re-exporting 20% of the imported material, a total of 637,000t of waste would actually need to be imported. If 637,000t is imported, approximately 127,000t would be re-exported. The total amount of material that is imported and exported would then be 765,000t.

If this 765,000t is divided equally over 12 years, the annual average for the amount of material that needs to be moved into and out of the site would be 63,750t per annum (tpa). Core Strategy Policy 3 (Policy CS3) of the Warwickshire Waste Core Strategy states that facilities managing 50,000t of waste per annum or more are classed as 'large scale waste sites'. Policy CS3 states that new facilities of this scale should be located within 5km of primary or secondary Warwickshire settlements. Edgehill Quarry does not match these criteria.

Even if the applicant's figure for the average amount of waste that would be imported (i.e. 42,500tpa) is accepted, it is important to note that this is just the average. The actual amount imported each year is likely to vary considerably, both above and below this average, depending on the vagaries of the construction and demolition industries. As such, it is likely that the permitted amount of waste that could be imported each year would need to

be considerably more than 42,500tpa. So, even in this scenario, it is still likely that the permitted amount of waste would need to be 50,000tpa or more, which is above the 'large scale waste site' threshold.

Further information regarding the potential implications of this quantity of material, with regards to HGV movements, is provided below, under the heading 'Tranquillity'.

A tabulated version of these figures is provided in Annex 3.

Multi-purpose complexity

The dual purpose of the proposed development (i.e. the combination of the landfilling / waste processing operation and the housing / tourism development) adds a high level of complexity to the assessment of the proposal and to the decision-making process.

This dual purpose potentially combines the worst of both purposes. For example, it has the effect of complicating and / or precluding alternative options / sites for one or both aspects of the development, in different combinations that ought to be considered. It also requires justification of all aspects of both purposes, including need, the scope for developing outside the AONB, the contribution (or harm) to the local economy and the balance between adverse and beneficial effects.

This multi-purpose complexity is itself a significant factor in the development meriting major development status.

AONB Management Plan and other Cotswolds Conservation Board Guidance

Policy CE13 of the Cotswolds AONB Management Plan 2018-2023¹ states that:

- *Proposals for new landfill sites and strategic waste facilities should not normally be permitted.*

In addition, the Cotswolds AONB Landscape Strategy and Guidelines (LSG) for Landscape Character Type 7 (High Wold), Section 7.6, states:

- *Avoid strategic waste disposal proposals within or adjacent to the AONB.*²

The proposed development is clearly landfill and so should not be permitted in the AONB. Given that the Board's analysis has shown that the landfill operation would be above the 'large scale waste site' threshold, it should also be considered to be a strategic waste facility (or strategic waste disposal proposal) within the AONB and should therefore be avoided.

Policy CE12 of the Cotswolds AONB Management Plan 2018-2023 states that:

- *Development in the Cotswolds AONB should be based on robust evidence of local need arising from within the AONB.*

On a related point, the Government's National Planning Practice Guidance (Natural Environment, paragraph 041), states that AONBs:

¹ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/12/Management-Plan-2018-23.pdf>

² <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/lct-7-high-wold-2016.pdf>

- [AONBs] are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas.³

In addition, Section 7.6 of the LSG states:

- Avoid importing waste into the AONB.

As outlined above, the primary sources of waste material would be urban areas outside the AONB. Given that there are no main towns or main rural centres within the Warwickshire section of the AONB (which extends approximately 20km beyond the site) and only four local service villages (Long Compton, Brailes, the Tysoes and Ilmington), the amount of waste that would be sourced from the AONB is likely to be very small. As such the vast majority of waste would be imported into the AONB and the development would not be based on local need arising within the AONB. On that basis, it should be avoided.

Policy CE10 of the Cotswolds AONB Management Plan 2018-2023 states that development in the Cotswolds AONB should be compatible with the guidance produced by the Cotswolds Conservation Board, including the Cotswolds AONB Landscape Strategy and Guidelines (LSG). Therefore, if a proposal is not compatible with the guidance in the LSG then it is also not compatible with the AONB Management Plan.

The Warwickshire Waste Core Strategy (paragraph 9.34) states that:

- Proposals that lie within ... the Cotswolds AONB ... must ... comply with the necessary policies of the Cotswolds AONB Management Plan.

In a similar fashion, the Stratford-on-Avon Core Strategy 2011-2031 (Policy CS.11) states that:

- *Development proposals ... within ...the Cotswolds AONB should ... be consistent with the objectives set out in the Cotswolds AONB Management Plan.*

Therefore, given that the proposed development does not comply with Cotswolds Conservation Board guidance or the Cotswolds AONB Management Plan, it also does not comply with the Warwickshire Waste Core Strategy and the Stratford-on-Avon Core Strategy.

Major development tests

As indicated in the covering letter, the Board does not consider that the applicant has adequately demonstrated the need for the proposed development. For example, paragraph 8.54 of the applicant's Planning Statement states that:

- *It has not been possible to quantify whether there is a shortfall in capacity for processing C&D waste within the County.*

We also do not consider that the applicant has adequately demonstrated that:

- (i) there are no suitable, alternative locations for the landfill and waste processing operation outside the AONB, especially given that there are 25 other facilities in the County with permission to manage inert and construction and demolition waste; or

³ <https://www.gov.uk/guidance/natural-environment#landscape>

- (ii) the need for the landfill and waste processing operation could not be met in some other way.

As indicated elsewhere in this response, we also consider that the adverse effects of the proposed development significantly outweigh the potential beneficial effects.

Setting

The Cotswolds AONB Landscape Character Assessment⁴ identifies 19 landscape character types (LCTs) within the Cotswolds AONB. The proposed development is located within LCT 7 (High Wold). More specifically, it is located in Landscape Character Area (LCA) 7G (High Wold: Edge Hill Ironstone Plateau).

Table 4.1 of the applicant's Landscape and Visual Impact Assessment (LVIA) states that, with regards to landscape sensitivity, the AONB in LCA 7G has very high value and high overall landscape sensitivity.

The site is also very close to multiple other AONB landscape character types / areas:

- LCA 2G Escarpment: Edge Hill (classified as 'very high overall landscape sensitivity' in the applicant's LVIA);
- LCA 6B Ironstone Hills and Valleys: Ratley Hills and Valley (classified as 'high overall landscape sensitivity' in the applicant's LVIA);
- LCA 19E Unwooded Vale: Vale of Feldon Fringe (not referred to in Table 4.1 of LVIA).

The Board considers that the close proximity of multiple LCAs and the high, or very, high overall landscape sensitivity of all of the relevant LCAs, means that development should be classed as major development in terms of 'setting'.

Potential to have a significant adverse impact on the purpose of AONB designation

Tranquillity

As outlined above, the Board's analysis indicates that the total amount of material that would be imported and exported would be 63,750 tonnes per annum (tpa).

Using the applicant's figures of 18t per HGV, this would equate to 3,542 HGV's per year, which equates to 7,083 HGV movements per year. Based on 250 working days per year, this would equate to approximately 28.3 HGV movements per day (mpd). The number of HGV movements associated with the currently permitted processing operation is 3.24 HGV mpd. The increase to 28.3 mpd would represent a huge 876% (or nearly 900%) increase on the current baseline.

Given that this site is likely to be the only source of HGV movements on the minor roads adjacent to the site, these minor roads are likely to experience a similar percentage increase in HGV movements. To put this increase in perspective, a 900% increase is 90 times larger than the 10% 'rule of thumb' threshold identified in Section 4.5 of the Board's Tranquillity Position Statement.⁵ This threshold is based on the thresholds set out in the Institute of Environmental Assessment's '*Guidelines for the Environmental Assessment of Road Traffic*'.

⁴ <https://www.cotswoldsaonb.org.uk/our-landscape/landscape-character-assessment/>

⁵ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/06/Tranquillity-Position-Statement-FINAL-June-2019.pdf>

The applicant does not appear to have explicitly identified the % increase in HGV movements associated with the proposed development (particularly the proposed landfill and waste processing operation). The Board recommends that the applicant should be required to provide this information, both with regards to the adjacent minor roads and with regards to other nearby roads (including the A422 and B4086) and settlements (including Edgehill and Ratley). This should take into account the fact that the eastern access will be opened up at the end of the second stage of infilling and would allow access for 'municipal waste lorries' at this entrance.

The Board considers that the increase in HGV movements, which would continue for more than a decade, would have a significant adverse impact on the relative tranquillity of the Cotswolds AONB.

The tranquillity of the AONB is one of the 'special qualities' of the AONB. 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.

The relative tranquillity of the AONB is also one of the factors that Natural England has identified as contributing to the natural beauty of AONBs.

Tranquillity is also an integral component of 'landscape' and 'landscape character'. As such, a significant adverse impact on the AONB's tranquillity would also represent a significant adverse impact on its landscape character.

ADDITIONAL COMMENTS

Landscape and Visual Impact Assessment

The applicant's Landscape and Visual Impact Assessment (LVIA) acknowledges that, as levels on the site rise through the infilling operations:

- there would be some awareness of the movement of machinery at high higher levels (for example in paragraph 5.81);
- the plant and machinery could become visible above surrounding vegetation – would just be glimpsed through vegetation in winter (for example, in paragraph 9.1).

Based on the information provided, these increased visual impacts would occur between approximately year 3 and year 11.

However, even where the LVIA acknowledges these visual impacts at individual viewpoints, it claims that the size / scale and geographical extent of the visual effects would not change from the current baseline. This does not provide an appropriate assessment of the magnitude of the visual effects.

Even if the size / scale of the visual effects is small, there would still be some change from the baseline of no visual effect. This change would be made more significant by the fact that there would be a high degree of contrast between the machinery and the more characteristic hedges and trees surrounding the site. The geographical extent would also increase from a baseline of zero to include the extent of the area over which the changes would be visible.

The geographical extent of the visual effects could be even more significant if the lighting used during the operational phase extends above the level of the surrounding trees and hedges. Given that the land drops away sharply on either side of the site, such lighting could potentially be seen for many miles.

The Board considers that the LVIA should have included viewpoints:

- where King John's Lane joins the land to the north of the site, as this is an access point to the footpaths along the escarpment edge; and
- on the adjoining minor roads (which are used recreationally used by cyclists, walkers and local residents), including at the entrance points to the quarry.

For the reasons outlined above, the Board considers that that it is likely that the LVIA has underplayed the visual impacts.

Dark skies

The Board acknowledges the measures that have been identified to minimise levels of light pollution.

However, in order to ensure that the lighting in both the operational and after use phases is acceptable in this sensitive AONB location, we recommend that the applicant should be required to assess this lighting against the obtrusive light limitations specified in Tables 1 and 2 of the 'Guidance Notes for the Reduction of Obtrusive Light', published by the Institution of Lighting Professionals.⁶ This guidance is included in Appendix B of the Board's Position Statement on Dark Skies and Artificial Light.⁷

As outlined in our comments on the LVIA, above, the Board is concerned about the potential visual impacts of lighting being seen for miles around, especially with regards to the waste processing machinery as ground levels rise during the infilling process. Whilst we recognise that this would be limited (timewise) to operational hours, the potential geographical extent of the visual impact increases the significance of this issue.

This also has the potential to have a significant adverse effect on the dark skies of the AONB, which are one of the AONB's 'special qualities'.

Proposed housing development

The Board acknowledges that the provision of four affordable, rented dwellings is much closer to the identified local affordable housing need than in the previous application.

However, it is not clear if the proposed housing complies with the requirements of Policy CS.15 (Section F) of the Stratford-on-Avon Core Strategy 2011-2031, which specifies that development should be restricted to '*small-scale community-led schemes which meet a need identified by the local community*' (underlining added for emphasis).

The Board is pleased to see that the bungalows would be clad in local Horton Stone. However, the bungalows should also be required to reflect the local Cotswold vernacular architecture, such as the vernacular features found on houses in the Conservation Areas of Radway and Edgehill. Using Cotswold / Horton stone for the roof tiles would also be a positive step.

⁶ <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2019/03/Dark-Skies-Artificial-Light-Appendix-B-ILP-Guidance-Notes-For-the-reduction-of-Obtrusive-Light.pdf>

⁷ <https://www.cotswoldsaonb.org.uk/our-landscape/position-statements-2/>

Previously developed / brownfield land

The Board acknowledges that the site could be regarded as previously developed, or 'brownfield' land, given that the mineral development phase did not include an agreed restoration scheme.

However, it is important to note that the requirement to make as much use as possible of previously-developed or brownfield land, as set out in paragraph 117 of the NPPF, does not apply where this would conflict with other policies in this Framework. As outlined elsewhere in this response, the Board considers that the proposed development would have a significant adverse effect on the purpose of AONB designation. As such, it would conflict with paragraph 172 of the NPPF. On this basis, the requirement to make as much use as possible of previously developed or brownfield land does not apply in this instance.

Also, the requirement to give substantial weight to the value of using brownfield land for homes only applies within settlements and, even then, only where this brownfield land is 'suitable'. In this instance, it is questionable if the site could be considered to be within a settlement. Given the points raised elsewhere in this response, the Board would not consider this brownfield land to be 'suitable' for the proposed development.

ANNEX 2. TABLE OF MAJOR DEVELOPMENT CONSIDERATIONS

Major Development Considerations	Infilling	Afteruse	Major Development?
Nature	<p>Large scale waste site (i.e. managing > 50,000 tpa).</p> <p>Infilling void of 350,000 cubic metres.</p> <p>Importing and exporting 765,000t (63,750tpa).</p> <p>Not within or in close proximity to (i.e. within 5km of) primary or secondary settlements or Coventry Major Urban Area.</p> <p>EIA Schedule 2 development (11b) – instillation for the disposal of waste (larger than 0.5ha).</p> <p>Major development in the context of The Town and Country Planning (Development Management Procedure) (England) Order 2015 – waste development.</p> <p>Cotswolds AONB Management Plan 2018-2023: Policy CE13 (Waste Management) - Proposals for new landfill and strategic waste management facilities should not normally be permitted in the AONB.</p> <p>Cotswolds AONB Landscape Strategy & Guidelines for LCT 7: - avoid strategic waste disposal proposals within or adjacent to the AONB; - avoid importing waste into the AONB.</p> <p>The principle sources of waste are likely to come from outside the AONB (Stratford on Avon, Shipston on Stour and Banbury). There are no main towns or main rural centres the Warwickshire section of the AONB and only four local service villages, so the AONB is only likely to provide a tiny proportion of the overall waste. (N.B. The Warwickshire section of the AONB extends approximately 20km from the site).</p>	<p>4 dwellings and 10 eco-pods.</p> <p>Not particularly significant, in this context, with regards to their nature, other than being located beyond the current limit of dwellings in Edgehill.</p>	Yes (infilling)

Major Development Considerations	Infilling	Afteruse	Major Development?
	<p>Contrary to the NPPG (Natural Environment, para 041): AONBs are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas.</p> <p>Contrary to Cotswolds AONB Management Plan Policy CE12: development in the Cotswolds AONB should be based on robust evidence of local need arising from within the AONB.</p>		
	<p>The dual purpose of the proposed development (i.e. the infilling and the proposed after use) adds a high level of complexity to the assessment of the proposal and to the decision-making process.</p>		
Scale	<p>See above.</p> <p>7.8ha</p>	See above.	Yes (infilling).
Setting	<p>Located in Landscape Character Area (LCA)7G (High Wold: Edge Hill Ironstone Plateau):</p> <p>Table 4.1 of LVIA (re landscape sensitivity) states very high value, medium susceptibility to the change from the quarry restoration and high overall landscape sensitivity.</p> <p>Also very close to multiple other AONB landscape character types / areas:</p> <ul style="list-style-type: none"> - 2G Escarpment: Edge Hill (very high overall landscape sensitivity). - 6B Ironstone Hills and Valleys: Ratley Hills and Valley (high overall landscape sensitivity) - 19E Unwooded Vale: Vale of Feldon Fringe (not referred to in Table 4.1 of LVIA). 	See previous cell.	Yes
<i>Potential</i> to have significant adverse impact on purpose of conserving and enhancing the natural			

Major Development Considerations	Infilling	Afteruse	Major Development?
beauty of the Cotswolds AONB?			
- Landscape quality	Adverse impacts not likely to be significant (except with regards to tranquillity – see below).	Adverse impacts not likely to be significant.	No (except with regards to tranquillity – see below)
- Scenic quality	Adverse impacts not likely to be significant.	Adverse impacts not likely to be significant.	No
- Relative tranquillity – traffic movements	Adverse impacts of HGV movements likely to be significant.	Adverse impacts not likely to be significant.	Yes
- Relative tranquillity - dark skies	Need to assess proposals against the ‘obtrusive light limitations’ set out in the guidance of the Institution of Landscape Professionals.	Need to assess proposals against the ‘obtrusive light limitations’ set out in the guidance of the Institution of Landscape Professionals.	?
Relative tranquillity - noise	?	Adverse impacts not likely to be significant.	?
- Natural heritage (inc. biodiversity)	Adverse impacts not likely to be significant.	Adverse impacts not likely to be significant.	No
- Cultural heritage (inc. historic environment)	Adverse impacts not likely to be significant.	Adverse impacts not likely to be significant.	No
- Other special qualities	Adverse impacts not likely to be significant.	Adverse impacts not likely to be significant.	No

ANNEX 3. TABLE COMPARING VOLUMES, TONNAGES AND HGV MOVEMENTS⁸

	Current consent	Previous application info			Current application info			CCB revised estimates			% increase compared to current permitted
		Imported	Recycled /exported (20% of imported)	Total imported and exported	Imported	Recycled /exported (20% of imported)	Total imported and exported	Imported	Recycled /exported (20% of imported)	Total imported and exported	
To be moved (cu m)	14,600	390,000	78,000	468,000	340,000	68,000	408,000	425,000	85,000	510,000	3,400% (34 fold)
To be moved (tonnes)	7,301	585,000	117,000	702,000	510,000	102,000	612,000	637,500	127,500	765,000	10,400% (104 fold)
Years	1	6	6	6	12	12	12	12	12	12	1,200% (12 fold)
Tonnes per year	7,301	97,500	19,500	118,000	42,500	8,500	51,000	53,125	10,625	63,750	872% (8.72 fold)
HGVs per year	406	5,417	1,083	6,500	2,361	473	2,834	2,951	590	3,542	872% (8.72 fold)
HGV movements per year	812	10,834	2,166	13,000	4,722	946	5,668	5,903	1,181	7,083	872% (8.72 fold)
HGVs per day	1.62	21.667	4.33	26.0	9.5	1.9	11.4	11.8	2.4	14.2	876% (8.76 fold)
HGV movements per day	3.24	43.33	8.67	52.0	19	3.8	22.8	23.6	4.7	28.3	873% (8.73 fold)
HGVs per hour	0.16	2.17	0.43	2.60	0.95	0.19	1.14	1.18	0.24	1.42	888% (8.88 fold)
HGVs movements per hour	0.32	4.33	0.87	5.2	1.9	0.38	2.28	2.36	0.47	2.83	8.84 fold

⁸ Data adapted from Table 2.23 of the applicant's Transport Statement Addendum, based on loads of 18t per HGV, 250 working days per year and 50 working hours/week.