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By email only to: [mary.hudson@oxfordshire.gov.uk](mailto:mary.hudson@oxfordshire.gov.uk)

2 February 2022

Dear Mary,

**APPLICATION NO:** MW.0124/21

**DESCRIPTION:** The modification of the approved restoration scheme through importation of inert soil material for nature conservation afteruses and the erection of 18 single storey holiday lodges with associated landscaping and car parking

**LOCATION:** Alkerton Quarry, Rattlecombe Road, Alkerton with Shenington

Thank you for consulting the Cotswolds Conservation Board ('the Board') on this proposed development, which would be located within the setting of the Cotswolds National Landscape.<sup>1</sup>

For the reasons outlined below, the Board **objects** to the proposal, pending further information and clarification from the applicant on current and proposed vehicle movements to allow the Board to more clearly assess the proposal's likely impact upon the tranquillity of the National Landscape.

In reaching its planning decision, the local planning authority (LPA) has a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of the National Landscape.<sup>2</sup> The Board recommends that, in fulfilling this 'duty of regard', the LPA should: (i) ensure that planning decisions are consistent with relevant national and local planning policy and guidance; and (ii) take into account the following Board publications:

- Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 ([link](#));
- Cotswolds AONB Landscape Character Assessment ([link](#));
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#));
- Cotswolds AONB Local Distinctiveness and Landscape Change ([link](#)); and
- Cotswolds Conservation Board Position Statements ([link](#)) particularly, in this instance, with regards to the Development in the Setting of the AONB ([link](#)) and the Tranquillity Position Statement ([link](#)) with regards to Section 4.5.

The application area is approximately 1.2 km (0.8 miles) south of the Cotswolds National Landscape, which is contiguous with the county boundary with Warwickshire and the western edge of the A422/Stratford Road at that point.

The Board's Tranquillity Position Statement referenced above recommends that proposals that have the potential to impact on the tranquillity of the AONB should accord with Policy CE4 of the Cotswolds AONB Management Plan 2018-2023, give great weight to conserving and enhancing the

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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](http://cotswoldsaonb.org.uk)

*Chairman:*  
**Brendan McCarthy**  
*Vice Chair:*  
**Rebecca Charley**

tranquillity of the AONB and assess potential impacts on tranquillity, particularly with regards to noise, vehicle movements and landscape and visual impacts. Cumulative impacts on tranquillity should also be taken into consideration in such assessments and with regard to the impact of the proposed development combined with other existing or proposed developments.

Section 4.5 of the Tranquillity Position Statement outlines how 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. On this basis, it can be argued that an increase in traffic flows of more than 10% from a development proposal or in combination with other proposals is likely to be significant and have an adverse impact on the tranquillity of the Cotswolds AONB.

As part of the restoration process, the proposed development involves the importation of c.90,000m<sup>3</sup> of inert waste soils which equates to c.150,000 tonnes over three years (i.e. 50,000 tonnes per year). This is in contrast to the approved restoration scheme which does not involve the importation of material, though the applicant now states, and OCC accepts, that the approved restoration scheme cannot be carried out. The applicant states that the approved restoration scheme would now require importing at least 75,000m<sup>3</sup> of infill material.

The applicant's Planning Statement identifies that the material will be sourced from specific waste categories set by the Environment Agency, for example, from local building projects. Infill material will be from local urban areas where residential and employment development is due to take place in the 2020s and other sites accessed from the immediate areas of the Midlands and M40 corridor.

The Transport Statement identifies that *'It is understood that some, but not all will come through Wroxton and from the Banbury area with the remainder being transported from the Stratford-upon-Avon area via the A422 from the north'* (paragraph 3.2). The applicant further estimates that there will be a 50/50 split in terms of the direction of HGV movements along the A422 with approximately 11 HGV movements from the south and 11 from the north per day. HGVs travelling to and from the site in a northbound direction (i.e. towards/from Stratford-upon-Avon) on the A422 would travel through the AONB.

Although the applicant asserts that the proposed development would lead to a reduction in trips on the highways network as the existing quarry consent allows for up to 350,000 tonnes of material per annum to be exported which is a greater amount than is proposed to be imported, it is understood that the quarry is no longer working at that level (the Transport Statement states at paragraph 2.4 that it was last worked in mid-2020) and is currently generating minimal traffic, therefore the proposed development would likely generate additional HGV movements along the A422 and through the AONB.

Appendix C of the Transport Statement presents the results of an Automated Traffic Count survey instructed by the applicant and carried out during July 2021, however it is difficult to analyse them

meaningfully to assess whether or not the 10% rule of thumb threshold may be reached by the proposal.

The daily count tables feature counts for 13 separate vehicle classifications, however neither the report nor the appendices provide any details as to what types of vehicles these 13 classes relate to. The counts are then grouped into three further higher order groups of 'Car/LGV/Caravan', 'OGV1/Bus' and 'OGV2', however, when discussing additional trip generation associated with the proposed restoration, the Transport Statement refers to 'HGVs' rather than the OGV1 and OGV2 classes used in the counts. Whilst OGV2 class vehicles would be clearly considered to be HGVs, OGV1 can include a wide range of vehicle types, some of which would be considered to be HGVs and some which would not.

The Vehicle Classification tables show that there was an average of 315 OGV1/Bus/OGV2 movements a day southbound on Stratford Road (i.e. travelling from the AONB) and 365 OGV1/Bus/OGV2 movements a day northbound (i.e. travelling towards the AONB). The vast majority of these movements are OGV1/Bus class vehicles (an average of 301 per day southbound and 351 per day northbound), with many fewer OGV2 class vehicle movements (14 per day southbound and 14 per day northbound).

The applicant states that the restoration material will be delivered to site by both 18 tonne rigid and 25 tonne articulated lorries. The Board's understanding is that whilst both would be considered to be 'HGVs', the 18 tonne vehicles would be classed as 'OGV1' and the 25 tonne vehicles classed as 'OGV2'. As such, due to the unclear and inconsistent way in which both the current and proposed additional levels of traffic movements, the Board cannot reach a definitive conclusion as to whether or not the 10% rule of thumb threshold is likely to be breached.

Therefore, **the Board requests that the applicant provides further clarification** of:

- What vehicles the 13 classification categories used in the counts included at Appendix C of the Transport Statement relate to;
- Which of these categories are then included in the three higher order categories shown in the table;
- Give figures for current 'HGV' movements from the counts to allow an easy comparison with the stated proposed movements; and
- Whether or not there is likely to be seasonal differences in HGV movements during the restoration phase.

The Board further notes that OCC Transport Development Control have raised an objection on the basis of an increase in HGV movements along the A422 as it is not a designated lorry route and in particular through Wroxton and Drayton to the east of the quarry.

Without prejudice, if the Council is minded to grant planning permission and is seeking to impose conditions concerning HGV routing in light of OCC Transport Development Control's objection to increasing HGV movements on the A422 south of the site, the Board similarly would not support any alternative routing or alternative sourcing of landfill which lead to a further increase over and above that proposed by the applicant in their Transport Statement, in the number of HGVs travelling along the A422 to the north in the interests of conserving the tranquillity and scenic beauty of the AONB.

Please don't hesitate to contact me if you would like to discuss this response further.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Joyce', with a small dot at the end of the signature.

Simon Joyce

Planning Officer

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## NOTES:

- 1) Cotswolds National Landscape is the new name for the Cotswolds Areas of Outstanding Natural Beauty (AONB). The 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.
- 2) Section 85 of the Countryside and Rights of Way Act 2000.  
[www.legislation.gov.uk/ukpga/2000/37/section/85](http://www.legislation.gov.uk/ukpga/2000/37/section/85)
- 3) The documents referred to in our response can be located on the Cotswolds National Landscape website under the following sections
  - a. Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023  
[www.cotswoldsaonb.org.uk/management-plan](http://www.cotswoldsaonb.org.uk/management-plan)
  - b. Cotswolds AONB Landscape Character Assessment  
[www.cotswoldsaonb.org.uk/lca](http://www.cotswoldsaonb.org.uk/lca)
  - c. Cotswolds AONB Landscape Strategy and Guidelines  
[www.cotswoldsaonb.org.uk/lsg](http://www.cotswoldsaonb.org.uk/lsg)
  - d. Cotswolds AONB Local Distinctiveness and Landscape Change  
[www.cotswoldsaonb.org.uk/ldlc](http://www.cotswoldsaonb.org.uk/ldlc)
  - e. Cotswolds Conservation Board Position Statements  
[www.cotswoldsaonb.org.uk/ps1](http://www.cotswoldsaonb.org.uk/ps1)  
[www.cotswoldsaonb.org.uk/ps2](http://www.cotswoldsaonb.org.uk/ps2)