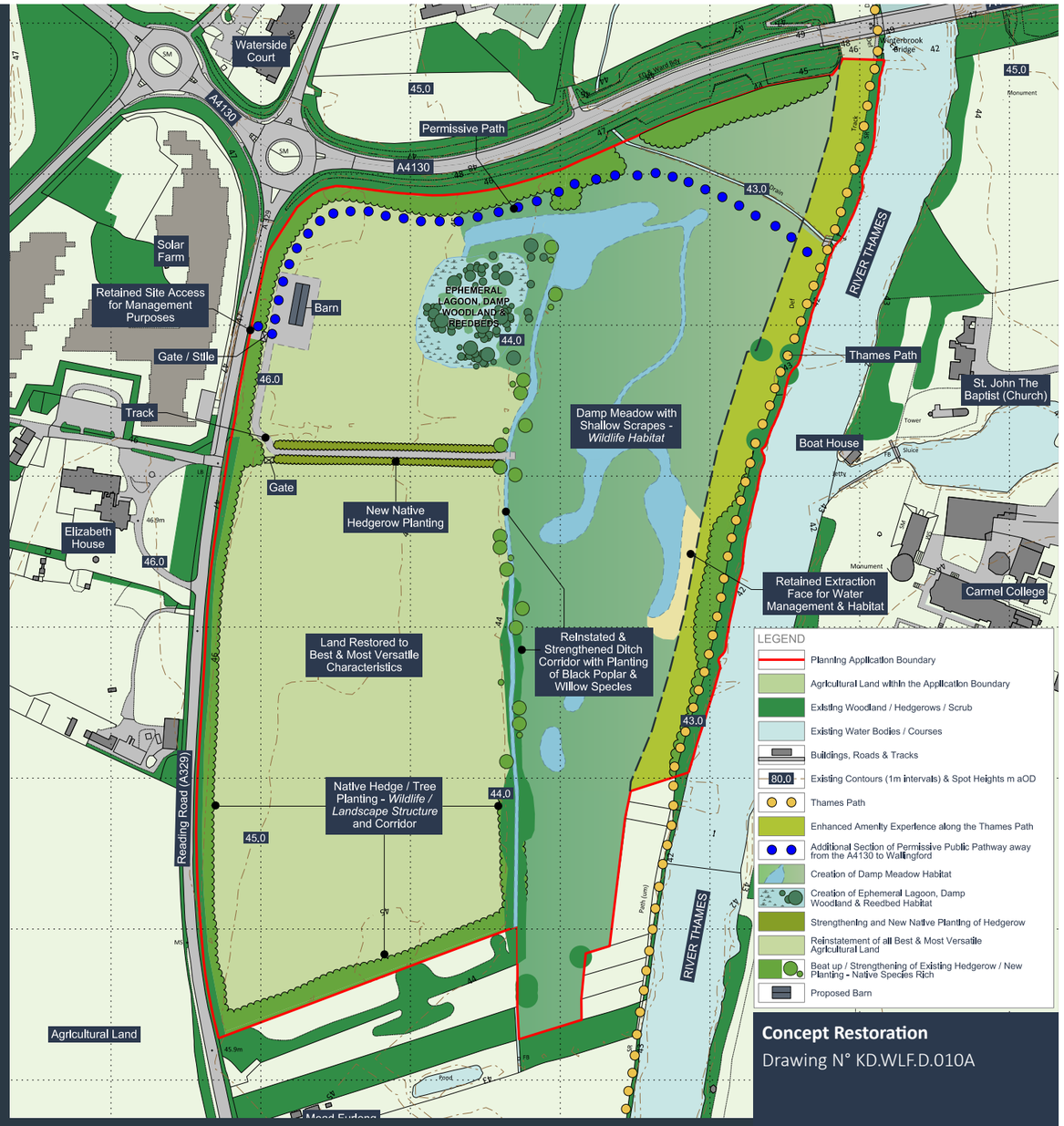

**Current Situation**
Drawing N° KD.WLF.D.002




**Concept Restoration**
Drawing N° KD.WLF.D.010A

## TEMPORARY DEVELOPMENT
## PERMANENT ENHANCEMENT

*Further Information in respect of Landscape Matters, forming part of a Regulation 25 Request by Oxfordshire County Council*

# Proposed Sand & Gravel Extraction at Land at White Cross Farm, Wallingford, Oxfordshire

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KEDD Limited

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## *Summary of Key Responses to Queries & Requested Additional Information:*

1. All landscape works have been carried out in accordance with the Guidelines for Landscape and Visual Impact Assessment (GLVIA3). The LVIA methodology being tested both within planning application processes and at planning inquiries.
2. The proposed development works are not located within an AONB. There are no landscape, ecological or heritage designations within the development area
3. The proposed development is temporary for a relatively short period of time (5-6 years). Mineral extraction and restoration works will be sequential and progressive, meaning that not all land will be disturbed / required for operations at any one point in time.
4. The site itself has a very limited zone of actual visual influence. It is set down within the landscape. Views into and out of it are limited. It is not a skyline feature.
5. The proposed mitigation measures during the operational period, include soil bunds and straw bales. Most potential views into the site are from locations at the same / similar elevations as the site and from close proximity. Therefore, relatively low height mitigation measures and angles of view will prevent / minimise potential views.
6. There is one principle receptor location from a higher elevation. This being the A4130 road bridge across the River Thames. Traffic on this bridge causes noise and disturbance / movement within the local area. Views from visual receptors in vehicles are very temporary / as receptors pass by. Potential views from users of an adjacent footpath are both transitory and not from a highly sensitive location adjacent to the busy road.
7. The bridge traffic, vehicles on the A4130, the Reading Road and road into Wallingford result in an unsettling and at the time constant background noise, which reduces the tranquility of the local area. Intermittent boat use of the river also occurs.
8. Concern has been raised in respect of the Chilterns AONB on the eastern boundary of the site, along with the Listed structures of St. John the Baptist Church and Carmel College Boat House.
9. It should be noted that the eastern boundary of the river, opposite the site, is generally heavily wooded / vegetated, notably limiting potential views of the proposed temporary operations from these listed buildings and the AONB. It is also noted that it was deemed acceptable by SODC to permit the development of 91 new houses within Carmel College, with the context and setting of listed structures, and within the Chilterns AONB. This development altering the setting of the AONB in this location. The construction period of these properties is similar to the whole of the temporary nature of the proposed quarry and restoration development.

## 1.0 INTRODUCTION

This document forms a response to the White Cross Farm, Wallingford Regulation 25 requests, specifically in relation to Landscape and Visual related items. It also summarises and provides responses to comments made on Landscape aspects, including those by South Oxfordshire District Council in their consultation response letter to Mary Hudson of Oxfordshire County Council, Haidrun Breith – Landscape Officer, Oxfordshire County Council, to Mary Hudson and Dr Michael Stubbs of the Chilterns Conservation Board. These three consultations being contained within Appendix A of this report.

Section 2.0 provides a general response to consultee comments, which are set out in further detail within Section 4.0. Section 3.0 provides a series of additional information items, requested by OCC and SODC.

Based upon the requested additional Regulation 25 information and response to comments, a summary assessment of the proposed applications accordance with relevant policies is provided in full within Section 4.0 of this document.

## PART 2.0 - General Response to Landscape Orientated Comments received as part of the Submitted Application

***a. Assessment Methodology***
***b. Progressive Nature of the Temporary Development***
***c. Mitigation***
***d. AONB***
***e. Policies***

# PART 2.0

## *General Response to Landscape Orientated Comments received as part of the Submitted Application*

## 2.0 GENERAL RESPONSE STATEMENT

It is noted within Oxfordshire County Council's Regulation 25 request, under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, that:

*"You should carefully consider the comments made by the Landscape Officer, Chilterns Conservation Board and Historic England, as they have expressed fundamental concerns about the proposed development in its location, which may be difficult to overcome."*

Please see below, five general responses in relation to the joint Landscape and Visual orientated comments received as part of the consultation process. Further commentary is provided within this supplementary information document.

### A - Methodology

The baseline assessment works associated with the production of the Landscape and Visual Impact Assessment LVIA) have been carried out In accordance with the Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3), produced by the Landscape Institute and Institute of Environmental Management and Assessment.

Based upon telephone discussions with Oxfordshire County Council's Landscape Officer Haidrun Breith, it appears that although a high level consideration of the requirements of GLVIA3 has taken place, this has not been supported or tested (assessed) against any form of systematic methodology. By taking this approach, the Landscape Officer judgements appear to be subjective, unsubstantiated and not justifiable. In respect of South Oxfordshire's Landscape and the Chilterns Conservation Board Officers, again no methodological approach / reference to GLVIA3 has been made. No clarification has been provided on considered Sensitivity of receptors, nor Magnitude (of Effect) from the proposed development and so no subsequent assessment of levels of Significance of Effect. In these respects, comment made on landscape and the AONB are again, subjective and unsubstantiated. This has in turn resulted in their misjudgement, referring to understated and / or overstated effects associated with the proposed temporary development and final restoration scheme, which are incorrect.

**e.g. effects associated with the Chilterns AONB within proximity to the site upon final restoration.** The LVIA has not understated the value and susceptibility, which combine to form the sensitivity of the AONB receptor, which is actually assessed as Very High (i.e. the highest level of sensitivity). It is acknowledged that the proposed restoration of the site is relatively small comparable to the current agricultural situation, in respect of landscape character and visual amenity. However, due to the assessed Very High Sensitivity of the AONB receptor to any form of change (Magnitude of Effect), results in relatively high levels of overall beneficial effects (in this case Moderate Beneficial). It is noted that in this instance, the Magnitude of Effect was assessed Low Beneficial due to the nature of land use restoration and enhancement (again not overstating the benefit of the scheme). This methodological process following that stated within GLVIA3 and Appendix B of the submitted LVIA. The Methodology used within the submitted LVIA is provided at Figure 1.

***FIGURE 1***

***RECEPTOR SENSITIVITY & MAGNITUDE OF EFFECTS***

***"Assessment of receptor sensitivity involves an evaluation of the 'Nature of the Receptor' (Sensitivity), in respect of the identified aspects of the development likely to give rise to effects. The receptors Sensitivity is considered to be dependent upon the susceptibility to change of the receptor with respect to the permitted or proposed development and on the value attached to either the landscape (landscape assessment) or view (visual assessment)."***

***"Following an assessment of the nature or sensitivity of the landscape/visual receptor an assessment was made of the nature or magnitude of effects associated with the proposed development. Those elements of the development that may affect landscape character and visual amenity can be defined as occurring during two main stages of the development and can be either associated with direct or indirect effects."***

***SIGNIFICANCE OF EFFECT***

| | | | NATURE of the Landscape/ Visual Receptor (Sensitivity) | | | | |
|---|---|---|---|---|---|---|---|
| | | | **Very High** | **High** | **Medium** | **Low** | **Very Low** |
| NATURE OF Effect (magnitude) | Adverse | **Very High** | Severe | Major | Notable | Notable / Moderate | Moderate |
| | | **High** | Major | Notable | Notable / Moderate | Moderate | Slight |
| | | **Medium** | Notable | Notable / Moderate | Moderate | Slight | Very Slight |
| | | **Low** | Notable / Moderate | Moderate | Slight | Very Slight | **Minimal** |
| | | **Very Low** | Moderate | Slight | Very Slight | Minimal | **Negligible** |
| | Neutral | **Neutral** | Neutral | Neutral | Neutral | Neutral | Neutral |
| | Beneficial | **Very Low** | Moderate | Slight | Very Slight | Minimal | **Negligible** |
| | | **Low** | Notable | Moderate | Slight | Very Slight | **Minimal** |
| | | **Medium** | Substantial | Notable | Moderate | Slight | Very Slight |
| | | **High** | Major | Substantial | Notable | Moderate | Slight |

## B - Progressive Phased Nature of the Proposed Development

As part of the landscape comments received, it also appears that consultation judgements are concentrated on two stages of the proposed development, **A** – during the Operational Stage, and **B** – at Post Restoration. There is limited consideration of the actual nature of the progressive phased working and restoration of the site. This by its very nature will limit the extent of 'temporary' changes and associated impacts on landscape and visual matters.

**e.g.** as a worst case scenario, within Phase 3, quarry operational land would include the plant site, mineral extraction and progressive restoration within Phase 3, associated soil storage bunds (Operational Land) equates to 8.76 Ha. The remainder of the site would cover ~4.61Ha of undisturbed land and ~ 5.58Ha of previously restored land / land restoration aftercare and management. This equates to approximately 40% of the operational area of the site being restored by this stage. Please note, at this point in time, progressive restoration will also be taking place within the southern area of Phase 3.

## C - Mitigation Measures

The appropriateness and effectiveness of mitigation measures, including the use of temporary straw bales, grass seeded and maintained soil storage bunds, and advanced planting, has been questioned. These measures are commonly accepted mechanisms by which developments of this nature can be temporarily screened in an effective manner and are suitable for this location.

We do not consider that an alternative mitigation measure e.g. soil bund or fencing is required to the proposed use of straw bales. The use of straw bales in respect of this specific proposal are considered appropriate. Further detailed information is provided at Section 4.0- Sheet 20 and 21, along with images of straw bales within the existing site and examples of soil screening bunds.

## D - AONB

Comments received in respect to the AONB, include the protection of setting and amenity of receptors. It must be stressed that the proposed development activities are not located within either the Chilterns or North Wessex Down AONB

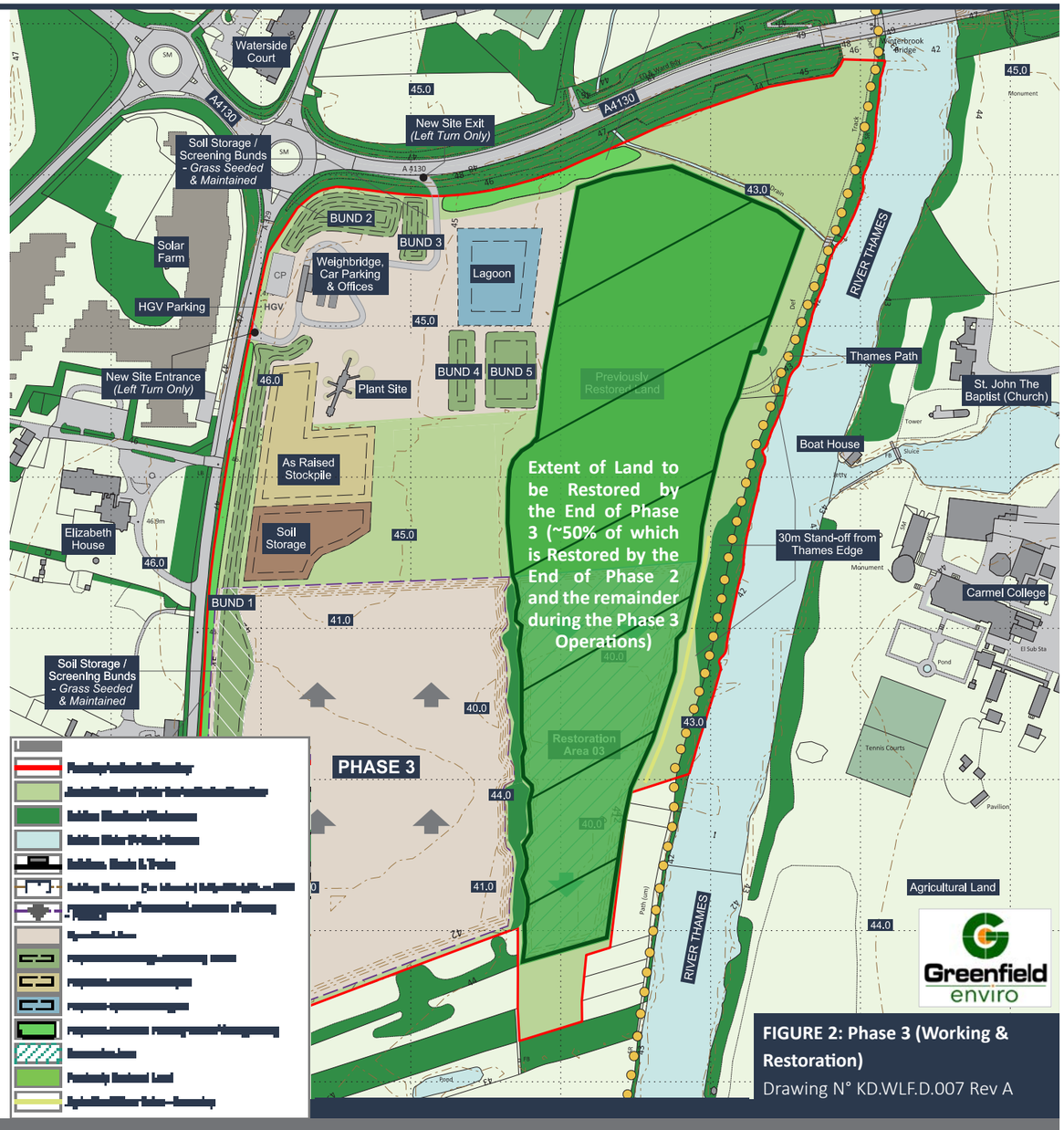



**FIGURE 2: Phase 3 (Working & Restoration)**
Drawing N° KD.WLF.D.007 Rev A

The proposed development will not physically result in any change to the AONB. Quarrying and restoration works will be of a temporary nature and are fully reversible, with restoration returning the site to its existing characteristics and setting (with enhancements to landscape character and potential Biodiversity Net Gain). The proposed development reflects considerations required of the now permitted Grundons Quarry development, located ~180 to the west of the site.

The size and scale of the proposed White Cross Farm development is small, compared to the geographical area and scale of the two AONB (Figure 3). It is also set down low within the landscape and it is not a skyline feature (Figure 4: View from site towards Chilterns AONB (contained landscape)). Its potential to effect the setting of the Chilterns AONB being very localised, of minimal effect, and of a temporary nature. This is in distinct contrast with the permitted residential development on the opposite bank of to the proposed quarry, at Mongewell / Carmel College, which is located within the Chilterns AONB with temporary construction activity, leading to long term / permanent change. It should also be noted that the permitted residential development is within the land use curtilage of listed buildings / assets of St. John the Baptist Church and Carmel College Boat House.

**E - POLICY CONSIDERATIONS**

From the outset, the proposed development has considered and addressed all relevant polices. The primary guiding policies being as follows. Further planning policy considerations are provided on Sheets 25 to 30 of this document.

**Policy M3** - Principal Locations or Working Aggregate Minerals- which states *"the principal locations for aggregate minerals extraction will be within the following strategic resource areas, in south Oxfordshire (South Oxfordshire District), The Thames and Lower Thames Valleys area from Oxford to Cholsey."*

**Policy M4** - states Specific sites for working aggregate minerals in accordance with policy M3, to meet the requirements set out in policy M2 will be allocated in the Minerals & Waste Local Plan: Part 2 – Site Allocations Document, taking into account the following factors:

**g)** avoidance of locations within or significantly effecting an Area of Outstanding Natural Beauty,
**i)** avoidance of locations likely to have an adverse effect on the significance of designated heritage assets, including World Heritage Sites, Scheduled Monuments, Conservation Areas, Registered Parks and Gardens and Registered Battlefields, or on archaeological assets which are demonstrably of equivalent significance to a Scheduled Monument; OMWLP Core Strategy – adopted plan 52 September 2017
**j)** avoidance of, or ability to suitably mitigate, potential significant adverse impacts on: **iii.** local landscape character;

Along with **Policy C8** - Landscape, **Policy C9** - Historic Environment and Archaeology, and **Policy ENV1** Landscape and Countryside.

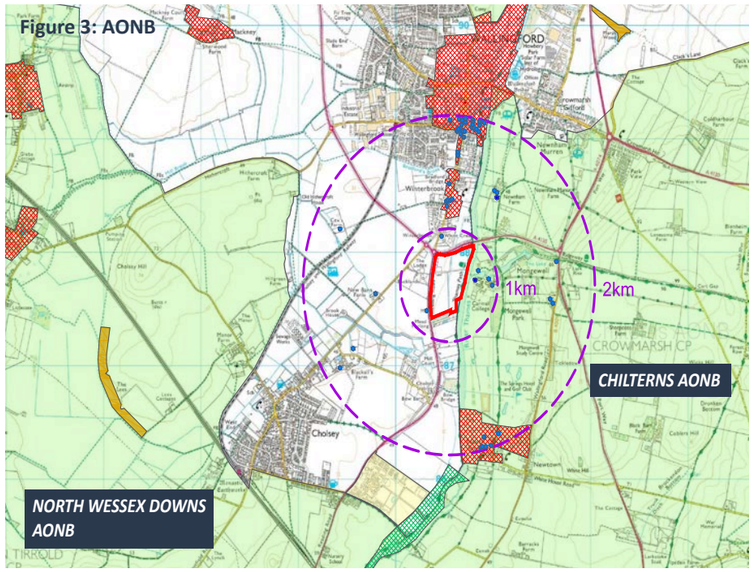


Figure 3: AONB


Figure 4: View from site towards Chilterns AONB (contained landscape)

The proposed temporary development, which falls within the defined strategic resource area, returns land to original ground levels and reinstates the typical agricultural land use parcel, with site wide enhancements to increase biodiversity and habitat inclusion, together with the strengthening of primary landscape character elements and features. The long term setting being maintained, protected and enhanced, whilst the phased operational development has been designed to both minimise the extent of disturbance at any one time, incorporate suitable mitigation measures, and to ensure no significant adverse effects within the temporary period of disturbance. Landscape and visual aspects being both mitigated and reversible.

**Based upon the above, the location of the proposed development both accords with policy and can be successfully integrated during the operational period without significant adverse effects on landscape and visual receptors (including AONB), and upon final restoration provides a long term sustainable management platform to both maintain best and most versatile agricultural land characteristics, with associated new habitat creation to promote Biodiversity Net Gain, and public amenity benefit.**

It also appears that both the comments from The Chilterns Conservation Board and inferences from South Oxfordshire, partly relate to the previously application for the site, for both mineral extraction and the creation and use of the site as a marina. The marina landscape not being proposed within the new application, rather this proposal being for mineral extraction and the use of original soils and inert fill to restore land to permanent wildlife enhanced agricultural land, with enhanced landscape character and visual elements and features. This may lead to confusion and / or misjudgement.

# PART 3.0
## Provision of Further Requested Information (Landscape)

## 3.0 PROVISION OF FURTHER REQUESTED INFORMATION (LANDSCAPE)

Oxfordshire County Council, in their Regulation 25 request, has sought additional information / clarification on the following landscape items:

1. **Clarification on whether it is proposed to retain the hedgerow and trees in the centre of the site, as the tree survey refers to their removal.**
2. **Further information is required on root protection areas, buffers and how vegetation will be protected.**
3. **Further details on the proposed bunds, including heights, locations, materials and visual impacts.**
4. **Further information on the type and source of the infill material .**
5. **A detailed landscaping scheme**
6. **An alternative treatment to the proposed straw bales.**
7. **Information on how the HGV movements would affect the AONB, for example further detail of the routes they would take.**

**Clarification and additional information is provided below:**

**Item 1** – ***Retention of Internal Hedgerow and Trees***
It is confirmed that the existing vegetation structure in the centre of the site is to be retained. The reason for this, being to both maintain a local site landscape feature (as requested by OCC Landscape Architect), together with its site internal screening potential, particularly afforded during the summer months when vegetation structure is at is greatest. Please note, the revised Arboricultural Assessment to reflect this is contained within Appendix B of this report. However, the main retained vegetation will comprise of seasonal growth and scrub, which will also maintain a site internal wildlife corridor.

**Item 2** – ***Root Protection***
It is confirmed that all trees are to be protected during the proposed operation period, in full accordance with BS 5837 This will include a minimum stand-off of 10m from all boundary woodland unless where additional stand-offs are required for specific root protection reasons. Please see Appendix B for the full Arboricultural Assessment. Within this document, the Arboricultural Protection Plan illustrates the stand-offs and Construction Exclusion Zones associated with existing trees / vegetation.

**Item 3** – ***Bunds***
Please refer to Drawing N° KD.WLF.D.013 Proposed Bunds and Straw Bales, within Appendix C. Details are provided below and on this drawing of the heights, locations, materials, and potential for visual impact. In summary, the following comments and assessment is made in respect of each individual bund.

| Bund ref. | Location | Height | Potential Receptors | Description Comments on Potential Visual Impact |
|---|---|---|---|---|
| Screening / Storage Bund 1 | Adjacent to western vegetated boundary with Reading Road (A329) / entrance and plant site | 3m Topsoil | Secondary screening beyond existing tree belt, for road users (including adjacent footpath) of Reading Road (A329), and tertiary screening for visitors and ground floor receptors of Elizabeth House (set back approximately 60m) | All temporary screening bunds will be established either fully or partly behind existing adjacent woodland block vegetation, and prior to any mineral extraction works. The bunds will be grass seeded and maintained. The location of the bunds will ensure that immediate potential receptors using and adjacent to the local road network will have minimal opportunity to view plant site activities. As a result of their locations beyond the existing vegetation (to be strengthened) the bunds will not appear as engineered structures.<br><br>It is not assessed that proposed new tree and shrub planting will result in an immediate change in screening potential. These plants will need to establish and grow. It is however, proposed to plant 20% of the stock as feathered trees of between 1.5 to 2.2m in height. These will add to site external screening. The main purpose of the site peripheral planting being to enhance and maintain the landscape structure planting at post restoration.<br><br>With respect to users of the Thames Pathway / River Thames- even if the proposed temporary straw bales screening mitigation was not in place, due to distance, the height of the proposed screening bunds, and the existing vegetation structure, the bunds would not be observed as skyline features, nor in isolation. Existing vegetation structure and the seeding of the bunds, visually integrating them into the existing site boundaries and local visual context.<br><br>As a result of the above aspects, the temporary bunds themselves, would not result in any significant adverse visual impact and will be effective in screening adjacent and local receptor potential views of the proposed development. |
| Screening / Storage Bund 2 | Adjacent to northern vegetated boundary with A4130 / site exit and plant site | 5m Subsoil | Secondary screening beyond existing tree belt, for road users of the A4130 and Reading Road (A329) (including adjacent footpath users), and tertiary screening for residents of Waterside Court. | |
| Screening / Storage Bund 3 | Adjacent to northern vegetated boundary with A4130 / site exit and plant site | 3m Topsoil | Secondary screening beyond existing tree belt, for road users of the A4130 and Reading Road (A329) (including adjacent footpath users), and tertiary screening for residents of Waterside Court. | |
| Temporary Soil Storage Area | Phase 4 extraction area- adjacent to Bund 1 | 3m Topsoil<br>5m Subsoil | Not for screening purposes. | Set internally to the proposed development, beyond soils screening bunding. Soils stored in this location will be seeded if in place for more than six months.<br><br>There is potential for occupants of the limited upper storey windows from Elizabeth House, to look across and down onto this bund, however, the potential visual impact is considered as Low as a result of intervening vegetation. |

The overall potential for visual impact has already been considered and assessed within the submitted Landscape and Visual Impact Assessment (LVIA).

**Item 4** – ***Further Information on the type and source of the fill material***

The fill material imported into the site will be for restoration purposes only. It will be directly placed within the sequential void created through mineral extraction. As such, it will be placed progressively behind

the working extraction face.

The fill will comprise inert construction waste – mainly clays and soils sourced from the local housing and development sector. There is substantial sources of fill from the Didcot, Wallingford and Abingdon housing schemes.

The fill material will be placed to create the restoration formation levels i.e. the topography and landform below the surface soil horizon. The soil horizon being comprised of currently in-situ topsoil, subsoil, and overburden. This material will be progressively stripped, temporarily stored and / or directly placed to re-establish the existing soil profiles and ensure appropriate areas of land are re-established to create Best and Most Versatile Agricultural Land Characteristics.

**Item 5** – ***Detailed Landscape Scheme***

A landscape scheme (plan) confirming the final landform (restoration contours) and the proposed post-restoration drainage network for the restored site is provided to compliment the proposed restoration scheme for the application site, which details the agricultural and nature conservation end uses to be established within the framework of the retained landscape features of the site (trees, hedgerows, central ditch feature and vegetation). The landscape scheme and restoration scheme are thus capable of being the subject of planning conditions requiring the delivery of all the proposed elements in a phased manner (as proposed in the Planning Application). In the normal manner, pre-commencement style planning conditions can then also be imposed on the grant of permission requiring the agreement of all planting/sowing details, planting maintenance regime and future aftercare of the land.

Please see opposite Figure 5, which illustrates the restoration contours for the site, integrating into the surrounding land levels / landform, together with Figure 6, which illustrates the detailed drainage layout Post Restoration.

**Item 6** – ***An alternative treatment to the proposed straw bales***

We do not consider that an alternative mitigation measure e.g. soil bund or fencing is required to the proposed use of straw bales. The use of straw bales in respect of this specific proposal being appropriate for the following reasons.

A The use of straw bales allows flexibility to enable their placement and removal quickly and efficiently utilising none specialist agricultural equipment. This provides the ability to limit the requirement for a long run of bales (or other screening materials or medium), by specifically placing bales adjacent to the actual limited area of land under extraction / adjacent progressively restored area of land (at any one time period of time). Once an area of each phase has then been extracted and subsequently restored the same straw bales can then be sequentially relocated to screen the next area of part phased extortion. This rolling process both limits the time the screening bales will be in place and is a sustainable use of locally sourced resources.

B The type of bales to be used are illustrated on Sheet 20 of this document. As can be seen by their very nature they are unobtrusive, of an agricultural nature

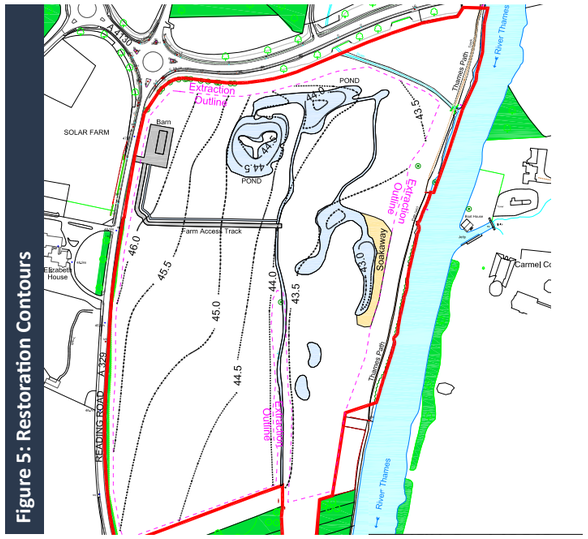



Figure 5: Restoration Contours

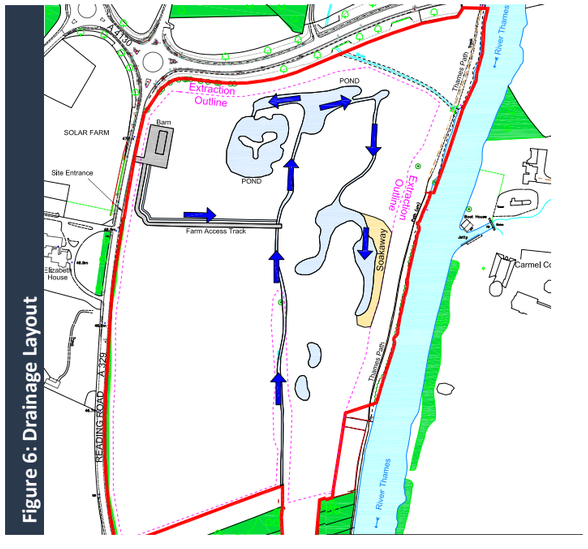



Figure 6: Drainage Layout

observed within the local character and which can be easily integrated into the specific site setting. The bales are also very versatile and adaptive to screen any specific on site and / or adjacent receptor and do not result in an adverse visual effect in themselves.

C As well as providing appropriate temporary visual mitigation straw bales also have very good noise attenuation capabilities through a combination of density and mass.

D The bales can also be staggered to both break up their form and also allow access off the river bank Thames Pathway should it be required. By their use in this way and limited sections of approximately 50 to 100m. (indicative plan of mineral extraction in Phases 1 and 2 to be provided illustrating how the straw bales will be used and length of section) the placement of the bales principally parallel to the river will not interfere with any water movement if temporary flooding should occur. If required and given the nature of the River and flexibility of the bales they could actually be totally remove in a very short period of time if needed

E It should be noted that on the quarry side of the bales will be a quarry safety fence. The bales themselves not being required as a physical barrier.

**Item 7** – ***HGV Movements and Impacts on the AONB***

It is noted within the AONB Management Plan 2019-2024 on matters of setting, that a development outside of the AONB can cause harm, and that this includes an increase in traffic generation.

The following information has been extracted from the submitted highways assessment, relating to traffic impact and movements:

**Traffic Impact**

***"The proposed mineral extraction process is anticipated to generate 56 movements per day. This equates to an increase of less than 0.6% on Reading Road. This impact cannot be material and the operations will be undertaken for a five year period.***

***On an hourly basis, this equates to an average generation of 5 - 6 movements per hour. These will be predominantly HGVs and therefore in passenger car units equivalent to around 12 cars per hour. There will of course be some variability in the generation as it will respond to demand.***

***The location adjacent to the principal road network means that traffic will disperse quickly on the road network.***

***Assuming that the demand is split between the A4130 and A4074 corridors then each corridor is likely to experience peak increases of only 3 HGVs/Hr in both directions and 1 additional vehicle every 20 minutes in both directions.***

***The traffic impact at the double roundabouts will be minimal, even accounting for the larger vehicle sizes, the change in traffic flows is well below 1% baseline link traffic flows. Such small changes are well within day-to-day variations in traffic and cannot be meaningfully represented in models.***

***Overall, the nature of the local road network is suitable to accommodate HGVs. A left-in, left-out arrangement will ensure minimal conflict between vehicles arriving and leaving the site as well as those already on the local network."***

On the basis that half the traffic will travel west towards Didcot, then only half will enter the AONB to the east. It should be borne in mind that this mineral related traffic will pass through the AONB only on existing routes, which will currently experience vehicle / HGV use with both landscape and visual receptors currently experiencing these types of movements as part of day to day experiences. Given the actual number of proposed vehicle movements within the AONB, of potential 2-3 per hour, in respect of landscape and visual / AONB setting impacts we do not consider that this would be a noticeable intensification, nor would it degrade the amenity and setting value of either receptors or the AONB designation.

In any case, any mineral HGV movements into the AONB will only be as a result of there being demand for construction aggregate for the carrying out of permanent built development that has been permitted in the AONB. As this application is for the supply of a finite and relatively modest amount of sand and gravel it will be a temporary/short-term operation responding mainly to anticipated demand from outside the AONB, particularly planned development around Oxford, Abingdon and Didcot. Any development demand for construction aggregate from within the AONB will need to be supplied with aggregate from any available source. Therefore, any mineral related HGV traffic travelling into the AONB will occur in any event from any available source – simply in response to the demand within the AONB. In this regard the Planning Application itself does not give rise to mineral HGV's in the AONB – they will occur in any event. As stated, most of the demand for the sand and gravel contained in the application site is anticipated from planned development outside the AONB, which is evidenced by the Oxfordshire Local Aggregates Assessment 2021 where it deals with future forecast demand, including significant population growth in Oxfordshire (see the "Need" section of the Regulation 25 documentation).

## PART 4.0 - Specific Responses to Landscape and Visual Considerations

*i.* ***AONB Setting, Users of the Thames Path, River Views and the A4130 Nosworthy Way (elevated road bridge) - <u>including Assessment Justification</u>***

**- The North Wessex Down and Chilterns Areas of Outstanding Natural Beauty (AONB)**

**- The Thames Pathway and River Views**

*ii.* ***Mitigation Measures***

*iii.* ***Tranquility***

*iv.* ***Heritage Setting***

*v.* ***Consideration and Accordance with Policies***

# PART 4.0
## Specific Responses to Landscape and Visual Consultation Comments

## 4.0 SPECIFIC RESPONSES TO LANDSCAPE AND VISUAL CONSULTATION COMMENTS

### *i. AONB Setting, Users of the Thames Path, River Views and the A4130 Nosworthy Way (elevated road bridge) - <u>including Assessment Justification</u>*

In response to comments made by Dr Michael Stubbs, principally relating to the North Wessex Down and Chilterns AONB, the following information provides additional commentary and LVIA assessment justification, clarifying the site's location and scale with respect to this and the North Wessex Downs AONB designated areas and their respective settings, its contained nature and the extent of actual visual influence associated with the site and proposed development, together with the potential impacts upon the limited number of localised visual receptors from the proposed temporary development.

*OCC Comment:* ***"I don't agree with the conclusions of the LVIA and consider that some of the landscape and visual impacts to be greater than stated. This is due to a combination of the LVIA underestimating the sensitivities of the landscape or visual receptors, and/or an underestimation of the magnitude of impacts. For example, I believe that insufficient consideration has been given to the site's role as a setting to the Chilterns AONB and to users of the Thames Path National Trail. I also believe that the effects of noise, dust and traffic movements caused by quarrying on the landscape resource (including the AONB) and its users have been insufficiently taken into account."****

**Further consultation comments are provided and responded to within the following Sheets.*

In summary, with respect of the site's role as a setting to the Chilterns AONB, we confirm that the current situation, operational period and post restoration scenarios of the proposed development have been considered. Based upon detailed site survey works, it is apparent that it is very difficult to actually view the site from anywhere other than adjacent / in close proximity to its boundaries. Additional commentary is provided with respect to the assessment of Susceptibility and Value in determining receptor Sensitivity, together with the assessed Magnitude of effect associated with the proposed development, combining to determine the overall Significance of Effect, in full accordance with the Guidelines of Landscape and Visual Impact Assessment (GLVIA3). As highlighted by OCC, SODC, these include users of the Thames Pathway, users of the River Thames, and users of the Nosworthy Road A4130 elevated road bridge.

## The North Wessex Down and Chilterns Areas of Outstanding Natural Beauty (AONB)

*OCC Comment:* ***"The Chilterns AONB Position statement highlights further the importance of views in and out of the AONB but also the need to give consideration to the loss of tranquillity caused by the introduction of lighting, activity and noise. It also highlights the impact of changes in landuse that are of sufficient scale to cause harm to the landscape character, and the introduction of abrupt changes to the landscape character particularly where they are originally of a similar character to the AONB.***

***The site is in an area that is already subject to a high number of developments, which cumulatively have put pressure on the existing local road network, and which affect the tranquillity and experience of the AONBs. I am concerned that the proposed development will further adversely affect tranquillity by introducing an industrial use into the area and adding further HGV movements onto the local road network.***

***I note that the Transport Assessment suggests that the development will result in only a very minor increase in vehicle movements on the local road network overall. I am no expert in this and am guided by the comments of my highway colleagues. However, as HGVs tend to have a greater impact on the landscape resource than cars it would be good to understand how the increase in HGVs compares with the current level of lorry movements. I am also not clear about the routing of the HGVs and the potential impacts they might have on the AONBs"***

The site and proposed development are set within and against an abundant, mature vegetation structure, including that associated with the River Thames corridor. This site contextual setting restricts the potential area of influence of both the existing site and proposed development upon the AONB, principally to the River Thames corridor itself and land immediately adjacent to it.

The images on Sheets 13 to 15 illustrate the existing vegetated nature of the site context and subsequent resulting screening effects from site adjacent and elevated land of both the North Wessex Down and Chilterns AONB. No opportunities exist at close range for receptors within the North Wessex Down to observe the site and / or proposed development, nor from receptor locations within and / or adjacent to the site towards the AONB.

Figure 7 illustrates the short section of River Thames and the Thames Pathway (~500m) which form the limited locations where observers can either gain views in or out of the AONB. These views are typically short range and principally from the Thames Pathway, where limited intervening vegetation exists and views are typically open, limited by the sites northern, western and southern boundaries. Visual mitigation measures, appropriate for the environment, have been designed and are integrated within the proposed development, together with the design of the proposed phased working and restoration scheme, which limits the area of disturbance at any one time and provides early restoration of the eastern half of the site (closest to the Chilterns AONB boundary).

Due to the nature of the mineral deposit, the proposed development is temporary in operational nature and relatively short term, with restoration providing a fully reversible site scenario with original ground levels and typical land uses reinstated, along with landscape, biodiversity and amenity enhancements, including to the Thames Pathway through interpretation and signage.

With respect to loss of tranquillity, this aspect is addressed on Sheets 22 and 23 Regarding visibility, it is important to note that the site is located within a discrete parcel of land with respect to the wider scale and nature of both the North Wessex Down and Chilterns AONB, with limited direct visibility at either close range or from distance as elevation in gained. Information relating to HGV movements is provided on Sheet 9 and 10.

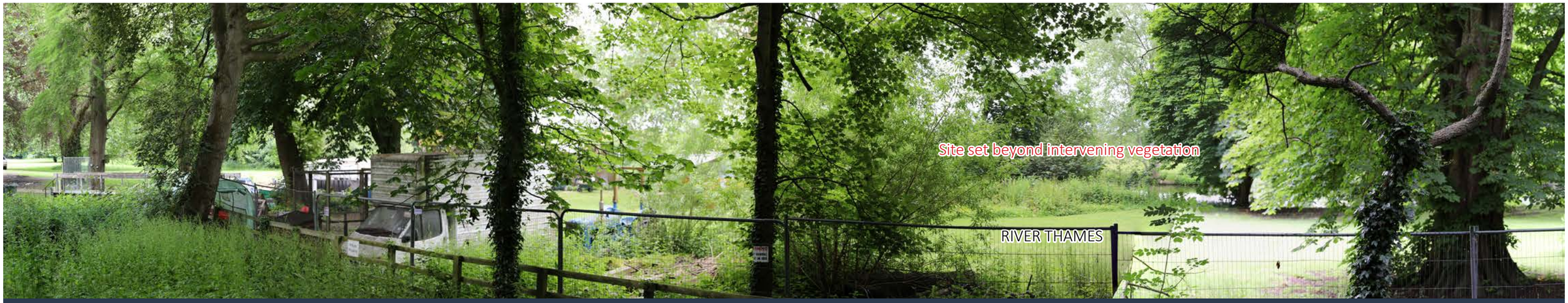



**FIGURE 7: VIEW FROM CHILTERNS AONB looking east towards the site**
**Representative close range AONB receptor view from PROW 181/36 - visibility restricted by existing trees / vegetation (SUMMER VIEW)**


**FIGURE 8: VIEW FROM CHILTERNS AONB**
**Representative medium range AONB receptor view from Constitution Hill - visibility restricted by dense vegetation structure**


**FIGURE 9: VIEW FROM CHILTERNS AONB**
**Representative medium to long range AONB receptor view from PROW 181/43 - woodland blocks in the mid ground screening the River Thames and the site**

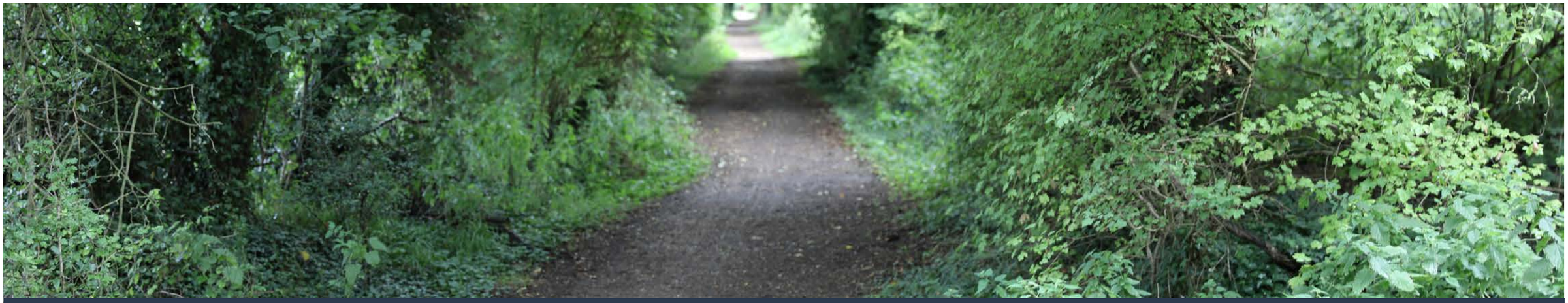


**FIGURE 10: VIEW FROM CHILTERNS AONB**
**View from Ridgeway PROW in relative proximity to the site - site is fully screening by extensive intervening woodland / vegetation**

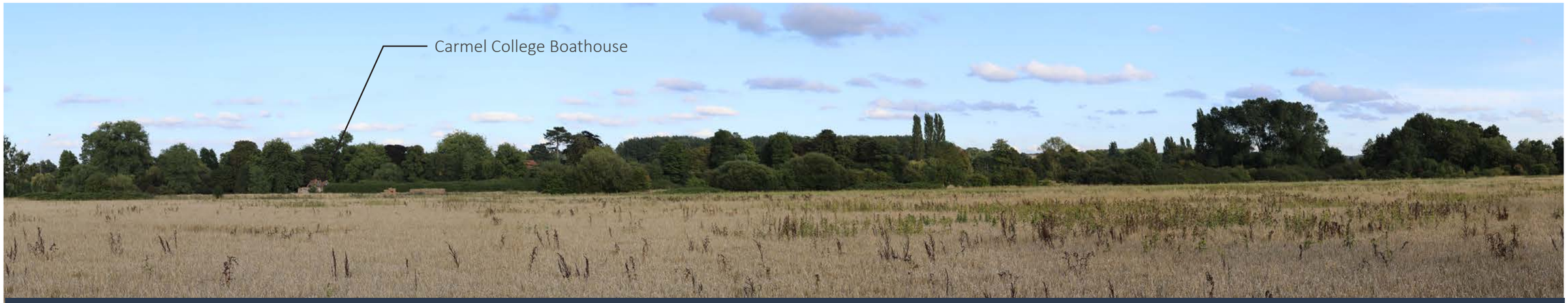



**FIGURE 11: SITE INTERNAL VIEW - looking out towards the Chilterns AONB. Please note, the internal setting is visually restricted and contained by site boundary and external woodland structure, limiting and preventing visual access to the higher escarpment of the AONB.**


**FIGURE 12: VIEW FROM NORTH WESSEX DOWNS AONB - In respect of the North Wessex Downs AONB, the small scale and geographical size of the site is completely obliqued from view. Combined with the strong River Thames corridor valley vegetation structure, this ensures that the proposed development would not be observed within its AONB setting.**

## The Thames Pathway & River Views

*OCC Comment:* ***"Users of the Thames Path will have uninterrupted views of the development and their experience will be adversely affected by the quarrying operations (views, noise and dust). As a way of mitigating these adverse effects the LVIA suggests the use of straw bales to mitigate impacts on views. I don't consider this to be an appropriate measure in this location as straw bales don't tend to last well and often look unsightly even after short periods of time. In addition, they are also unlikely to be very effective in keeping people away from the quarry void as they often attract people to climb on them, which in turn poses a potential risk to injury.***

***I therefore do not consider these to be an effective measure in mitigating adverse effects on users of the Thames Path and the AONB."***

*SOCC Comment:* ***"The recreational values are assessed as Medium to High. As well as the users of the river mentioned such as leisure fishing and boating, this stretch of the river is very well used by rowers. In the vicinity of the site are the rowing clubs for Oxford University, Oxford Brookes University and Wallingford Rowing Club. This stretch of the River is therefore intensively used and I consider the recreational values to be high. Further to this are the walkers along the Thames Path and also people walking across the A4130 bridge, all of whom currently have a clear view and enjoyment of the site. This view will be adversely affected, not just by the extraction itself, but also by the new egress onto the A4130 that would be constructed and the trees required to be removed to enable this.....I consider that the users of the River have a High Susceptibility to change of Visual Receptor and a High Value of View, rather than Medium as expressed in the LVIA. Also, referred to above is the prominence of the site in views from the raised section of the A4130 Nosworthy Way, the value of which has a Low Assessed Value of View. I would suggest that this should be Medium because there are clear and open views of the site and the River as vehicles slow down to enter the roundabout and the River. Pedestrians along this stretch of the A4130 would also have a Medium Assessed Value of View given the openness of the view.***

***Given the importance of the River views in the setting of St Johns Baptist Church, as emphasised by Historic England in their response to the application, I would suggest that the Assessed Value of View should be High rather than Medium."***

**The Thames Pathway:**

With respect to visual effects / impacts associated with users of the Thames Pathway, whilst it is acknowledged that the potential exists for users to "have to the uninterrupted views of the development", it is considered that appropriate low level agricultural mitigation measures of flexible straw bales has been integrated within the proposed temporary operational period, which would successfully mitigate the potential for any significant adverse effects associated with the proposed development upon these visual receptors.

The suitability of the proposed straw bales as an effective method of screening has been clarified on Sheets 8 and 9 of this document. As highlighted, the method of temporary screening is nationally accepted and provides the flexibility for screening to be erected and removed when it is no longer required- minimising the duration that the features will be in place, and allowing for te features to be moved alongside the progressive working and restoration of the development. This approach has been fully integrated into the detailed phased working of the site, with proposed straw bale screening only being required associated with Phases 1 to 3 of the 5 phase proposed development, at which time (upon completion of Phase 3), all land within Phases 1 and 2 will have been fully restored, reppresenting an approximate 100m buffer from the Thames Pathway to operational land. The northern ~ 50% of this restored land will have been restored by the end of Phase 2 of the proposed development and thus negating the need for temporary screening bales along this stretch of the pathway. As well as providing appropriate temporary visual mitigation, straw bales also have very good noise attenuation capabilities.

It is further noted that the Thames Pathway is a long distance access route, with the proposed development being alongside just a 500m stretch of pathway. As outlined within the wider application documents, a 30m stand-off is to be maintained, protected and managed alongside the Thames Pathway, which in combination with the above proposed straw bales, will provide both distance and screening of the proposed development during its temporary lifetime.

Upon final restoration, the visual nature of the site and that of views from the Thames Pathway and its experience will be enhanced, along with the installation of bespoke interpretation and signage to provide further opportunities for enjoyment of this stretch of the route.

With respect to safety, it should be noted that on the quarry side of the bales will be a quarry safety fence. The bales themselves not being required as a physical barrier. The bales would be set some 30m from the route of the pathway. Straw bales are a feature of the current site, utilised alongside its agricultural management. There would be no additional risk through their utilisation for screening purposes.

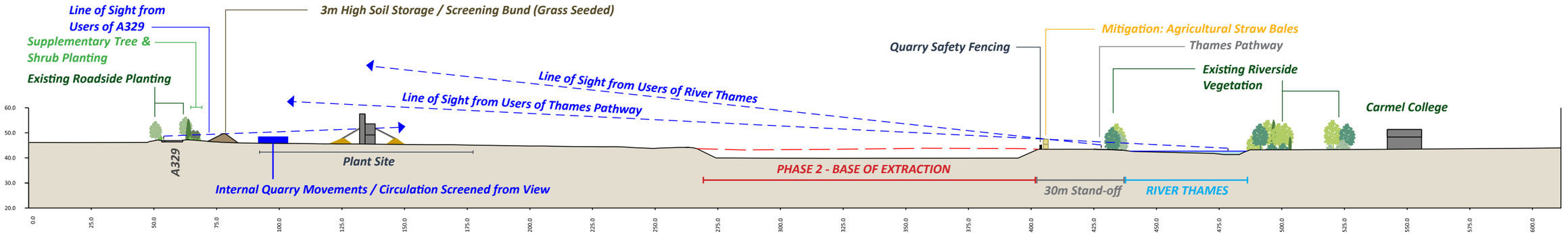
**River Views:**

With respect to the River Thames where it flows adjacent to the site, due to the nature of the waterway, users are transient and recreational. Much of this stretch of river is vegetated, limiting the actual opportunities for visual interaction with the site and the proposed development. As highighted above, a minimum 30m stand-off is integrated which in combination with the proposed straw bales, will provide both distance and screening of the proposed development during its temporary lifetime. Straw bales being features observed within the existing agricultural site, which due to angle of view, would be low level and temporary, progressive moving alongside the phased nature of the working scheme.

Upon final restoration, the visual nature and setting will be full restored and enhanced.

The section below together with photography overleaf, illustrate the visual setting of users of both the Thames Pathway and the River Thames, set within the context of

***FIGURE 13: Typical Section from West to East thorugh the Site:***



With specific regard to the River Thames Pathway National Trail, sections of which are within the eastern site application area, Figure 14 to 19 illustrate the nature of the amenity experience as users pass by the site from north to south.

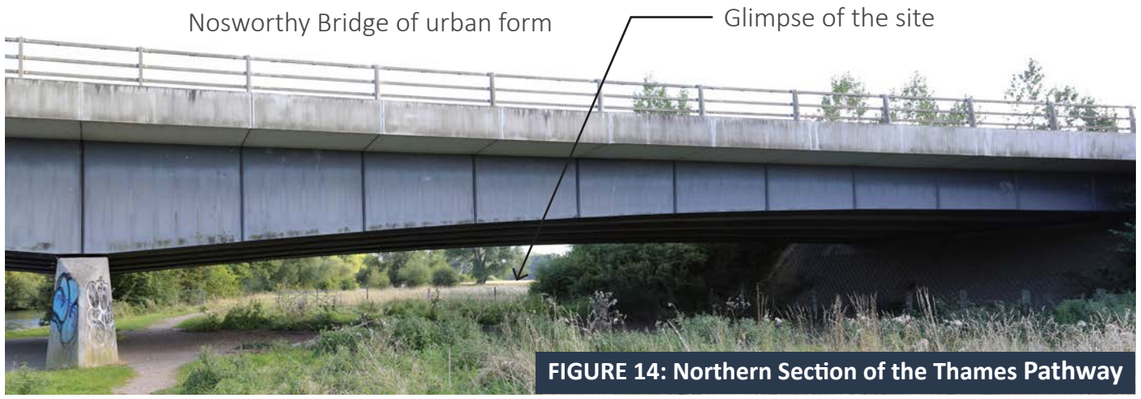


**FIGURE 14: Northern Section of the Thames Pathway**

**FIGURE 15: Recreational river use, set down below adjacent land levels**

**FIGURE 16: Well vegetated boundary of eastern bank of River Thames, adjacent to Carmel College**

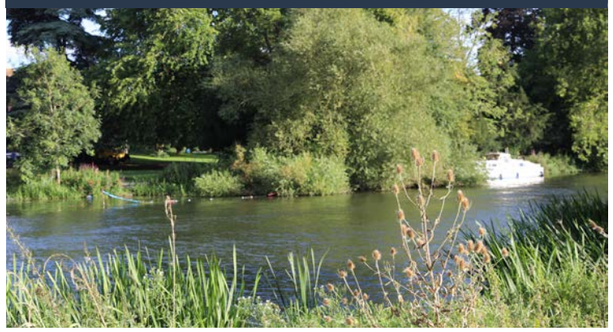


**FIGURE 17: Mid / Southern Section of the Thames Pathway**


**FIGURE 18: Southern Section of the Thames Pathway**

**FIGURE 19: Central Section of the Thames Pathway - looking north**


Users of this section of the River Thames Pathway National Trail are located within a semi-urban fringe / recreational environment, before travelling further south to a more tranquil river setting environment. The character of this area is not wild, as suggested by SODC Landscape Architect. Again, the LVIA has not understated either the Sensitivity (Susceptibility / Value) of users of this pathway. Receptor Sensitivity being considered as High. It is acknowledged that receptors using this pathway could have clear views of all proposed temporary development operations from relatively close proximity. Part of the path is located within vegetation in proximity to the river bank. This thicket of vegetation is approximately 100 metres in length. Currently, walkers are using a minor "informal" diversion around the thicket as they travel along the Thames Path. As a consequence, the thicket, and the obstruction of the "definitive" bankside route of the path has become more dense. Given the potential sensitivity of path users to the impact of temporary views of the adjacent quarry phases a potential mitigation measure that is easily delivered is to judiciously clear a bankside route through the thicket to re-establish the definitive line of the Thames Path, whilst retaining sufficient density of vegetation on the western flank of this route to screen walkers from the proposed temporary quarry phases. The definitive line, once cleared, could be waymarked clearly to provide guidance to walkers on the line of the route. In carrying out such proposed works the surface of the path would be cleared and rendered safe and walkable for path users. Thus, re-establishing the definitive line of the path along this currently obstructed section of the route would reduce and minimise the potential impact of the adjacent temporary working phases of the quarry on Thames Path users. Such mitigation works, if considered acceptable, are capable of being the subject of a planning condition, where the detail and timing of the work could be agreed with the MPA (including Rights of Way Officers) and the works delivered prior to the commencement of workings in proximity to this section of the path. In addition, a simple form of low level agricultural mitigation is proposed that would also screen the works from users of the Thames Path. This being via the use of straw bales which may be relocated along the progressively extracted and restored areas, and thus limiting visual distance. With screening mitigation in place, we assess the potential for visual impact to users of the pathway to be Moderate Adverse. Please note that mineral extraction and restoration woks within ~100m of the path (within Phases 1 and 2) would be completed within 3 years, and in this period, between 50-75% of land would be disturbed at any one point in time. Receptors still having views across and along the River Thames and onto the undisturbed and / or restored land within the site.

### *ii. Mitigation Measures*

*OCC Comment:* ***"The LVIA also heavily relies on proposed mitigation measures. The retention and proposed strengthening of the existing boundary vegetation is welcomed but new planting will take time to mature. Existing planting will assist in softening views but is unlikely to be fully effective especially during winter months when trees and hedges are not in leaf. It is also unclear how existing vegetation will be adequately protected from excavations or storing of materials (including bunds). The phasing drawing suggests that excavation comes close to vegetation potentially adversely affecting the root protection areas of trees and mature hedges.***

***The use of 3-5 m high bunds along the western boundary and northwestern corner are proposed to screen the development in views. This can assist in mitigating views and noise from some locations (eg West of the site), but bunds are also often uncharacteristic elements in the landscape and have the potential to adversely affect character and views in their own right depending on their height, gradient and treatment. Further detail on the bunds is required should the development be approved."***

**Response:**

Strengthening of Existing Vegetation

With respect to the strengthening of the peripheral vegetation structure of the site, this is proposed as an initial / advanced item, to allow new planting the longest possible time to establish. A combination of shrubs and whips would be planted to provide both height elements and overall increased density. Whilst it is acknowledged that this vegetation will not have sufficient time to develop to maturity to provide operational screening in its own right, the proposals are supplementary to further site internal screening methods, and it is considered that the additional planting will provide strengthened lower level screening / additional planted density within the existing woodland / tree blocks. Given the transient nature of immediate peripheral visual receptors to the north and the west of the site (including vehicular road users and pedestrians), this will further filter potential eye level views into the site (including within winter months), where grass seeded bunds will be maintained beyond.

Protection of Existing Vegetation

As highlighted on Sheet 6, it is confirmed that all trees are to be protected during the proposed operation period, in full accordance with BS 5837. This will include a minimum stand-off of 10m from all boundary woodland unless where additional stand-offs are required for specific root protection reasons. Please see Appendix B for the full Arboricultural Assessment. Within this document, the Arboricultural Protection Plan illustrates the stand-offs and Construction Exclusion Zones associated with existing trees / vegetation.

Screening Bunds

All temporary screening bunds will be established either fully or partly behind existing adjacent woodland / tree block vegetation, and prior to any mineral extraction works. The features will note be visible / perceivable as uncharacteristic features from publicly accessible locations and are temporary for the operational period of the development only. From the north and west, the bunds present either secondary or tertiary screening of the proposed development. The bunds will be grass seeded and maintained and as a result of their locations beyond the existing vegetation (to be strengthened) the bunds will not appear as engineered structures with their principal foam being filtered.

The location of the bunds will ensure that immediate potential receptors using and adjacent to the local road network will have minimal opportunity to view plant site activities. Bunds ranging in height from 3m (topsoil) to 5m (subsoil).

Regarding visibility from the east, principally associated with users of the Thames Pathway / River Thames,- even if the proposed temporary straw bales screening mitigation was not in place, due to distance, the height of the proposed screening bunds, and the existing vegetation structure, the bunds would not be observed as skyline features, nor in isolation. Existing vegetation structure and the seeding of the bunds, visually integrating them into the existing site boundary structure.

As a result of the above aspects, the temporary bunds themselves, would not result in any significant adverse visual impact and will be effective in screening adjacent and local receptor potential views of the proposed development.

Figure 20: Straw Bales within the Site

Figure 21: Examples of Soil Storage / Screening Bunds

### *iii. Tranquillity*

*SOCC Comment:* ***"The tranquillity of the site in the LVIA is assessed as being low to medium because of the noise generated by vehicle traffic. However, when the District Council's Landscape Officer visited the site in relation to the marina application, she found that "The experience of using the Thames Path at this location is tranquil. The trail is not well maintained and the place seems somewhat wild as well. Although there is light background noise from roadway, the noise of bird calls and wind blowing through trees is strongly perceived in favour of road noise."***

**Response:**

Tranquillity is considered to be *"a state of calm, quietude and is associated with a feeling of peace"* (ref South Downs National Park Authority: Tranquillity Study 2017). Aspects of tranquillity can involve the strength of a link to nature, positive features in the landscape, the importance of wildlife and peace, quiet and calm. The term is also defined in the glossary of the third edition of the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) (LI and IEMA 2013) as *"a state of calm and quietude associated with peace, considered to be a significant asset of landscape".*

The Clywidian Range and Dee Valley AONB associate Tranquillity, in Landscape Character and Quality terms, as combining the following:

Tranquillity - *"is associated with an atmosphere of calm and stillness, peace and quiet and with dark night skies"*

Remoteness and Wilderness, Space and Freedom - *"Remoteness and wilderness is associated with a feeling of trepidation and sometimes even danger, The Sublime. Space and freedom is related to access to the landscape and the uninterrupted and extensive views from high places within it and the link between communities and their landscape. A sense of belonging and attachment to the landscape."*

Tranquillity is assessed through the review of both audible factors (hearing) and visual factors (seeing) in determining the perceived quality and level of tranquillity.

Figure 22 (opposite), illustrates the site's proximity to the road bridge over the River Thames, along its northern boundary. Figure 23 (opposite), illustrates typical vehicle movement over the bridge in proximity to the site. Figure 24 (below), illustrates vehicle movement along the Reading Road adjacent to the western boundary of the site. Figure 25 (below), illustrates roundabouts and road junctions / traffic movement to the north west of the site, leading into Wallingford.

Based upon site survey works associated with the original proposed marina development, and the subsequent mineral extraction and progressive restoration application, it is clear on the ground that the site is not a typically tranquil environment and comprises both audible and visual man-


Figure 22


Figure 23

made characteristics and components. Along with visible built form and infrastructure, road noise and human presence, movement and use in proximity to the site also emanates from boat users on the River Thames - which is not infrequent. These factors combine to reduce the potential for tranquillity of environment. There is considerably more man-made sound than natural sound and very little of the time when man made sound was not present. In addition to the baseline characteristics, there will also be additional built development from permitted construction works, and subsequent human occupation, associated with the residential development at Mongewell / Carmel College.

The Greenfield Associates Noise Assessment report addresses both current baseline noise (audible) levels, together with those of the proposed operational mineral development. The baseline noise associated with the existing site and that of a series of surrounding noise receptors, including those within the AONB, further clarify the presence of road noise (background and ambient levels). The assessment report continues to conclude that the potential noise associated with the proposed temporary development area acceptable and can be successfully controlled, meeting national criteria and within significant adverse effects to local receptors / users.

It is not considered that the site or its peripheral margins, represent typically tranquil spaces. There are considerably more man made sounds than natural sounds, and very little of the time when man made sounds are not present. Man-made visual structures and features form components of views and remove any sense of visual tranquillity. As highlighted above, these include the raised engineered embankment of the A4130 and the bridge structure itself, together with surrounding built form and river activities. It is considered that the assessment of tranquillity within the LVIA as Low to Medium is suitable given the composition of audible and visual factors.

The lack of tranquillity does not remove the sense of enjoyment attached to the Thames Pathway and its users. It does, however, acknowledge that in this location, enjoyment of the route can be maintained alongside suitable background noise levels and within proximity to man-made visual structures / features.

It is noted that the Thames Pathway is a long distance access route, with the proposed development being along side just a 500m stretch. As outlined within the wider application documents, a 30m stand-off is to be maintained, protected and managed alongside the Thames Pathway, along with temporary agricultural straw bales which will effectively provide intermediate screening of the principal operational areas of the site as they are progressively worked and restored. As well as providing appropriate temporary visual mitigation, straw bales also have very good noise attenuation capabilities. It is noted that upon completion of Phase 3 of the development, all land within Phases 1 and 2 will have been filly restored, presenting an approximate 100m buffer from the Thames Pathway to operational land. The northern ~ 50% of this restored land will have been restored since the end of Phase 2 of the proposed development.

Upon completion of the proposed development, the site will be restored to a agriculturally managed land parcel, with enhanced boundaries and site wide biodiversity benefits. These factors providing an enhanced visual (and potentially audible) setting, increased visual quality via active management, and public amenity value via the provision of interpretation to the Thames Pathway.


Figure 24


Figure 25

### *vi. Heritage Setting*

*Historic England Comment relating to the Grade II Listed Former Carmel College and Boathouse (including attached Julius Gotliebb gallery):* ***"The mature trees surrounding both listed buildings filter views out from the environs of both listed buildings. However, the proposed development site is clearly visible from both, particularly the grade II* boathouse, as there is a gap in the trees which allows reasonably clear views across the river.***

***Gravel extraction would dramatically change the character of the development site, and what is currently an open field would become an unattractive industrial landscape. Extraction is due to take place for 6 years which would result in relatively time-limited harm, but harm would still be caused throughout that time period.***

***The proposed restoration plan is markedly improved from the earlier marina scheme as it would be essentially returning the site to a naturalistic one with a sense of tranquillity which would serve to conserve the significance of the listed buildings nearby.***

***Due to the 4-5-year timeframe for extraction with 1 year for restoration (as set out on page 1 of the Planning Statement 2021) it appears that opportunities to minimise negative change to the setting of the listed buildings during the harmful extraction phase are not possible (such as through planting, which would take longer than this to establish and provide meaningful visual screening), although it might be possible to improve the planting along the riverbank from the outset of any scheme (i.e. not wait until the restoration phase), as this lies outside of the extraction area.***

***Historic England has concerns regarding the application on heritage grounds.***

***The harm to the grade II* boathouse and grade II church of St John the Baptist cannot be considered to have been justified and outweighed by public benefits as required by paragraphs 200 and 202 of the NPPF at present as part 2 of the Oxfordshire Minerals and Waste Local Plan has yet to be prepared and the relative merits of all potential sand and gravel extraction sites properly evaluated."***

A 30m standoff from the western bank of the River Thames is incorporated into the proposed development, providing immediate separation and protection of a significant corridor of grassland habitat beyond the intermediate river corridor and existing mature planting. Beyond the 30m stand-off, proposed agricultural visual mitigation via the placement of straw bales has been incorporated within the proposed operational development. These straw bales being temporary and moveable to allow them to be established and subsequently removed progressively alongside the phased nature of the mineral extraction, inert infilling and restoration, which would closely follow. These features forming part of the existing agricultural management of the site and thus an existing temporary visual feature within the wider setting of the highlighted heritage assets.

It is noted that whilst the life of the development would be ~6 years, the working and subsequent restoration of the eastern half of the site would have been completed by the end of Phase 3 of the five phase proposed development. ~50% of this land having been fully restored by the end of Phase 2. Upon completion of this restoration, the operational areas of the proposed development would be ~100m+ from the western bank of the River Thames and thus a greater distance from the highlighted heritage assets.

It is considered that the above in-built mitigation measures have been designed and integrated to successfully minimise negative changes to the setting of the highlighted listed buildings / heritage assets within the short term temporary development period. On this basis, it is judged that no significant harm would be received.

As highlighted by Historic England, the proposed restoration would serve to conserve the significance of listed buildings nearby.

## *viii. Consideration and Accordance with Policies*

Landscape objections to the application have been submitted by the following:

- OCC Landscape Officer
- SODC Head of Planning Services
- Chilterns Conservation Board

Historic England has also raised concerns over the impact of the proposals on a number of listed buildings.

Having assessed these responses it is notable that there is either a lack of reference to the most relevant (landscape related) mineral planning policies, which are clearly of major importance in the determination of the application, or indeed the somewhat "judicious" references to adopted minerals policy by the OCC landscape officer.

Objections have not been clearly set or framed against the main (adopted) mineral planning policy tests that apply to landscape considerations on this application.

Therefore, the sections below, which deal with important and relevant elements of the Development Plan, as well as other material policy considerations, set out the mineral planning tests that should apply to the landscape considerations in the determination of the proposal and important points as to how the proposals relate to these tests.

**NPPF 2021**
The objectors and English Heritage have all referred to the "non-minerals" elements of the NPPF that relate to AONBs in the context of suggested potential adverse impact of the proposals on (primarily) the Chilterns AONB.
These include:

- *"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues…"The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise impacts on the designated areas"* (Para 176) (Our emphasis underlined)

- *"When considering applications for development within National Parks, the Broads and AONB's, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest"*. (Para 177) (Our emphasis underlined)

It is acknowledged that the above paragraphs are potentially relevant considerations, particularly the need to sensitively locate and design the proposals to minimise impacts on the AONB – which our scheme has done. However, it is our view that considerable weight should be attached to the content of paragraph 211 of the NPPF 2021. This states:

*"When determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy. In considering proposals for minerals extraction, MPAs should:*

*a. As far as practicable, provide for the maintenance of landbanks of non-energy minerals from outside National Parks, the Broads, AONB's and World Heritage Sites, scheduled monuments and conservation areas:*
*b. Ensure that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality;* (Our emphasis underlined)

Having regard to these NPPF references we must highlight the following points that we consider should have considerable positive planning weight attached to them.

Whilst the red line application boundary of the proposals clips the edge of the Chilterns AONB (where its boundary runs close to the bank of the River Thames) all the proposed operational development is situated outside of the AONB. In that regard the grant of planning permission would ensure a positive contribution to the aggregate (non-energy minerals) landbank of sand and gravel permissions in Oxfordshire thus properly according with paragraph 211 (a) of the NPPF 2021.

It is acknowledged that the proposals do sit adjacent to the Chilterns AONB and have potential to impact upon the setting of the AONB, albeit (in terms of the operational elements of the proposals) temporarily and over a short duration. In this regard, and taking account of paragraph 176 of the NPPF 2021 (*"development within their setting should be sensitively located and designed to avoid or minimise impacts on the designated areas"*) the application proposes a series of mitigation measures, such as phasing, retention of important vegetation/features, screening, etc to minimise temporary operational impacts and proposes restoration end uses that are appropriate and beneficial to the setting of the AONB in the long-term with a mixture of agriculture and nature conservation uses. The design of the scheme provides that sufficient mitigation is employed over the relatively short operational phases to ensure that, whilst there will be some short-term transient impacts (as the operations move through phases) there are, overall, no unacceptable impacts on the natural environment, particularly given the beneficial end-uses. In short, the LVIA demonstrates that there will be no significant adverse effects on AONB receptors.

As there is a strong need for additional sand and gravel supplies in south Oxfordshire, the benefits of which are in the wider public interest, it is considered that the proposals fully accord with the thrust and intent of NPPF policy in protecting the setting of AONB's.

**THE OXFORDSHIRE MINERALS AND WASTE LOCAL PLAN PART 1 CORE STRATEGY (2017)**
The objections referred to above either make minimal reference to important relevant minerals policies that relate to development location, landscape and setting of the proposals or are somewhat inaccurate/incomplete in how the reference is presented. In particular, the suggested nature of the alleged landscape effects on the AONB and are not set against the relevant mineral policy tests.

Therefore, set out below is an explanation of important relevant elements of minerals policy contained in the OCC Minerals

and Waste Local Plan Part 1 Core strategy 2017 (MWLP CS 2017) and how the proposals accord with the policy tests.

**Policy M3**- Principal locations for working aggregate minerals

The policy states:

*The principal locations for aggregate minerals extraction will be within the following strategic resource areas, as shown on the Policies Map:*

*Sharp sand and gravel in northern Oxfordshire (Cherwell District and West Oxfordshire District):*
- *The Thames, Lower Windrush and Lower Evenlode Valleys area from Standlake to Yarnton;*
- *in southern Oxfordshire (South Oxfordshire District and Vale of White Horse District):*
- *The Thames and Lower Thame Valleys area from Oxford to Cholsey;*
- *The Thames Valley area from Caversham to Shiplake. Soft sand*
- *The Corallian Ridge area from Oxford to Faringdon;*
- *The Duns Tew area.*

*Crushed rock:*
- *The area north west of Bicester;*
- *The Burford area south of the A40;*
- *The area east and south east of Faringdon.*

*Specific sites (new quarry sites and/or extensions to existing quarries) for working aggregate minerals within these strategic resource areas will be allocated in the Minerals & Waste Local Plan: Part 2 – Site Allocations Document, in accordance with policy M4.*

*Specific sites for extensions to existing aggregate quarries (excluding ironstone) outside the strategic resource areas may also be allocated in the Minerals & Waste Local Plan: Part 2 – Site Allocations Document provided they are in accordance with policy M4.*

*Sites allocated for sharp sand and gravel working (including both new quarry sites and extensions to existing quarries, including any extensions outside the strategic resource areas), to meet the requirement in policy M2 will be located such that approximately 25% of the additional tonnage requirement is in northern Oxfordshire and approximately 75% of the additional tonnage requirement is in southern Oxfordshire, to achieve an approximately equal split of production capacity for sharp sand and gravel between northern and southern Oxfordshire by 2031.*

There has been minimal or no reference to this policy in the landscape objections, yet it is this policy that has guided the minerals industry to the location that is the subject of this application.

The policy indicates that principal locations for sand and gravel extraction are located within Strategic Resource Areas (SRA), including, in South Oxfordshire, the Thames and lower Thames valleys area from Oxford to Cholsey. Policy M3 makes clear that this is a location where OCC are looking to deliver new sand and gravel extraction sites to meet supply requirements of circa 1 mtpa referred to in Policy M2 (a requirement that is not currently being met). Policy M3 also makes clear that 75% of additional tonnage to meet requirements from 2017 onwards is to be delivered in southern Oxfordshire to reduce reliance on northern Oxfordshire.

In locational and therefore broader landscape terms, the adopted strategic policies, are guiding and preferring new extraction to take place in the Thames Valley, where our application is sited, in order to meet adopted supply requirements, but also to make a strategic shift from an operational reliance on north Oxfordshire to a greater proportional future contribution from south Oxfordshire.

When other locational and delivery factors are taken into account, including – quality/quantity of mineral, landowner interest, proximity to markets, access arrangements, avoidance of ecologically sensitive areas, avoiding location in AONB, maintaining distance from settlements, etc (i.e. all part of the deliverability considerations) – there are, in-effect, only limited opportunities within the SRA for the siting and working of important river valley sands and gravels which are needed by the construction industry.

In the context of Policy M3 our proposal site accords with the aims and intent of the policy, whilst also taking account of other potential constraints. In other words, it is strategically situated in an a location that the Core Strategy has strongly indicated is a part of the Oxfordshire landscape where sand and gravel working is likely to take place in the future.

**Policy M4**- Sites for working aggregate minerals

The policy states:

*Specific sites for working aggregate minerals in accordance with policy M3, to meet the requirements set out in policy M2 will be allocated in the Minerals & Waste Local Plan: Part 2 – Site Allocations Document, taking into account the following factors:*
- *a. the quantity and quality of the mineral resource;*
- *b. priority for the extension of existing quarries, where environmentally acceptable (including taking into consideration criteria c) to l)), before working new sites;*
- *c. potential for restoration and after-use and for achieving the restoration objectives of the Plan in accordance with policy M10;*
- *d. suitability & accessibility of the primary road network;*
- *e. proximity to large towns and other locations of significant demand to enable a reduction in overall journey distance from quarry to market;*
- *f. ability to provide more sustainable movement of excavated materials;*
- *g. avoidance of locations within or significantly affecting an Area of Outstanding Natural Beauty;*
- *h. avoidance of locations likely to have an adverse effect on sites and species of international nature conservation importance and Sites of Special Scientific Interest; in the case of locations within the Eynsham / Cassington / Yarnton part of the Thames, Lower Windrush and Lower Evenlode Valleys area, it must be demonstrated that there will be no change*

*in water levels in the Oxford Meadows Special Area of Conservation and the proposal must not involve the working of land to the north or north east of the River Evenlode; in the case of locations within the Corallian Ridge area, it must be demonstrated that there will be no change in water levels in the Cothill Fen Special Area of Conservation;*

*i. avoidance of locations likely to have an adverse effect on the significance of designated heritage assets, including World Heritage Sites, Scheduled Monuments, Conservation Areas, Registered Parks and Gardens and Registered Battlefields, or on archaeological assets which are demonstrably of equivalent significance to a Scheduled Monument; OMWLP Core Strategy – adopted plan 52 September 2017*

*j. avoidance of, or ability to suitably mitigate, potential significant adverse impacts on:*

*i. locally designated areas of nature conservation and geological interest;*
ii. non-designated heritage assets;
*iii. local landscape character;*
*iv. water quality, water quantity, flood risk and groundwater flow;*
*v. best and most versatile agricultural land and soil resources;*
*vi. local transport network;*
*vii. land uses sensitive to nuisance (e.g. schools & hospitals);*
*viii. residential amenity & human health; and*

*k. character and setting of local settlements potential cumulative impact of successive and/or simultaneous mineral development, including with non-mineral development, on local communities; and*

*l. ability to meet other objectives and policy expectations of this Core Strategy (including policies C1 – C12) and relevant policies in other development plans.*

Firstly it should be noted that Policy M5 goes on to allow for sites to come forward tin advance of the adoption of the MWLP Part II Site Allocations document-

*"Prior to the adoption of the Minerals & Waste Local Plan: Part 2 – Site Allocations Document, permission will be granted for the working of aggregate minerals where this would contribute towards meeting the requirement for provision in policy M2 and provided that the proposal is in accordance with the locational strategy in policy M3 and that the requirements of policies C1 – C12 are met."*)

Specific sites for working aggregate minerals in accordance with policy M3, to meet the supply requirements set out in policy M2, need to take account of a series of factors including at item (g) – *"the avoidance of locations within or significantly affecting an AONB"*.

Virtually all the application site (apart from a small area along the boundary with the Thames), and certainly the operational elements, are situated outside the Chilterns AONB and well outside the North Wessex Downs AONB.

Whilst the application site will have some limited, short-term, transient impact at the edge of the Chilterns AONB a combination of factors indicate that the impact would not be significant and would not breach the threshold of acceptability referenced in the NPPF. The reasons are as follows:

- The site's low lying position in the river valley with minimal intervisibility with the Chilterns escarpment.
- The buffering effect of the Carmel College site on the opposite bank of the River Thames (in the river valley) containing an extensive existing development of buildings/structures and woodland and now with planning permission for the construction of an additional 166 residential units and associated development. The permitted development will involve a considerable period of construction with consequent permanent buildings and structures in the location close to the river.
- The low-level nature of the sand and gravel extraction and progressive restoration scheme and the phased, progressive working of the site over a relatively short duration.
- The design of the mineral working and restoration scheme including the retention of central structural features (trees/ hedge/watercourse) and the retention of boundary vegetation, along with the use of screening bunds and other measures to restrict views into the site.
- The phased working and restoration nearest the River Thames – opposite Carmel College – will be completed relatively quickly, thus minimizing/limiting impact, as the sand and gravel deposit is relatively shallow in this part of the site.
- Restoration of the application site will take place progressively and rapidly as the workings progress and the restoration to a mix of agriculture and nature conservation end uses will ensure that the permanent effect on the landscape and the setting of the AONB will be positive.

In terms of local landscape character (item Jiii) the level of potential sensitivity is not as great as that of the Chilterns AONB. The LVIA has though had careful regard to the character of the low lying floodplain location and the characterization of the landscape and the habitats by local assessment. The LVIA indicates that there are no significant adverse effects with mitigation of short-term impacts and the delivery of a restoration scheme that will deliver beneficial end uses that retain best and most versatile agricultural land as well as nature conservation uses that deliver biodiversity gains to the locality. The proposed retention of both boundary and central landscape features will help the land quickly assimilate into the local landscape as the restoration is completed.

**Policy W6 -** Landfill and other permanent deposit of waste to land

The policy states:

*"Non-hazardous waste*

*Provision for disposal of Oxfordshire's non-hazardous waste will be made at existing non-hazardous landfill facilities which will also provide for the disposal of waste from other areas (including London and Berkshire) as necessary. Further provision for the disposal of nonhazardous waste by means of landfill will not be made.*

*Permission may be granted to extend the life of existing non-hazardous landfill sites to allow for the continued disposal of residual nonhazardous waste to meet a recognised need and where this will allow for the satisfactory restoration of the*

*landfill in accordance with a previously approved scheme.*

*Permission will be granted for facilities for the management of landfill gas and leachate where required to fulfil a regulatory requirement or to achieve overall environmental benefit, including facilities for the recovery of energy from landfill gas. Provision should be made for the removal of the facilities and restoration of the site at the end of the period of management.*
*Inert waste*

*Provision for the permanent deposit to land or disposal to landfill of inert waste which cannot be recycled will be made at existing facilities and in sites that will be allocated in the Minerals and Waste Local Plan: Part 2 – Site Allocations Document. Provision will be made for sites with capacity sufficient for Oxfordshire to be net-self-sufficient in the management of inert waste.*

*Priority will be given to the use of inert waste that cannot be recycled as infill material to achieve the satisfactory restoration and after use of active or unrestored quarries. Permission will not otherwise be granted for development that involves the permanent deposit or disposal of inert waste on land unless there would be overall environmental benefit.*

*General*

*Proposals for landfill sites shall meet the requirements of policies C1 – C12. Landfill sites shall be restored in accordance with the requirements of policy M10 for restoration of mineral workings."*

The EIA Regulation 25 request for further environmental information from Oxfordshire County Council dated 22nd November 2021, under the heading "Landscape" requests *"further information on the type and source of the infill material".*

In simple terms the infill material will comprise inert construction waste – mainly excavated clays and soils sourced from the local housing and economic development sector. There are substantial sources of this type of fill material from planned housing and other development schemes in and around Oxford, Didcot, Abingdon, Wallingford and other local sites.

There is clear evidence of the likely availability of this type of material from development sites in these locations set out in the latest Oxfordshire Local Aggregates Assessment (LAA) 2021. The following points are relevant:

*"Oxfordshire Housing and Growth Deal: Provides £60m for affordable housing and £150m for infrastructure improvements, including road and rail. Supports the ambition of building 100,000 new homes across Oxfordshire between 2011 and 2031 to address the county's severe housing shortage and expected economic growth."* (LAA 2021)

*"OXIS (2017) (Oxfordshire Infrastructure Strategy) forecasts that in the period 2016-2040, 123,500 additional homes will be built in Oxfordshire, the equivalent of 5,100 homes being built per year; and that population will increase by 39% from 688,000 to approximately 956,000."* (LAA 2021)

*"Adopted Local Plans in the Oxfordshire indicate the major sites for new homes:*

- *Cherwell – concentrated around Bicester, Banbury and the former RAF site at Upper Heyford, plus growth around Begbroke, Kidlington and Yarnton to meet Oxford's unmet need.*
- *Oxford City – concentrated at Barton Park, Northern Gateway and Oxpens.*
- *South Oxfordshire – concentrated around Chalgrove Airfield and the Didcot Garden Town in conjunction with Vale of White Horse, with further strategic land at the edge of Oxford*
- *Vale of White Horse – concentrated around the Didcot Garden Town, Wantage and Abingdon (the Science Vale)*
- *West Oxfordshire - Concentrated at Cotswold Garden Village Eynsham, North Witney and Chipping Norton."*

*(LAA 2021)*

*"In March 2018, the six Oxfordshire authorities signed the Oxfordshire Housing and Growth Deal. It committed the authorities to collectively delivering 100,000 homes and infrastructure across the county between 2011 and 2031."* (LAA 2021)

The volume of developments planned and anticipated in Oxfordshire, as set out in in the LAA 2021, will give rise to both demand for sand and gravel and will also generate substantial quantities of clean, inert, excavated material from initial site works. There will therefore be significant volumes of such material available to fill and restore the planning application mineral workings and accord with the objectives of policy W6 by enabling the satisfactory restoration of the site to a mix of best and most versatile agricultural land and areas of low-lying nature conservation adjacent to the River Thames. The restoration of the site to a mix of original levels and low-lying wetland habitats will produce a landform and land-uses that are sympathetic with the local landscape and the mix of uses within it and will accord with the requirements of policy M10 concerning restoration of mineral workings.

**Policy C8** – Landscape

The Policy states:

*Proposals for minerals and waste development shall demonstrate that they respect and where possible enhance local landscape character, and are informed by landscape character assessment. Proposals shall include adequate and appropriate measures to mitigate adverse impacts on landscape, including careful siting, design and landscaping. Where significant adverse impacts cannot be avoided or adequately mitigated, compensatory environmental enhancements shall be made to offset the residual landscape and visual impacts.*

*Great weight will be given to conserving the landscape and scenic beauty of Areas of Outstanding Natural Beauty (AONB) and high priority will be given to the enhancement of their natural beauty. Proposals for minerals and waste development within an AONB or that would significantly affect an AONB shall demonstrate that they take this into account and that they have regard to the relevant AONB Management Plan. Major developments within AONBs will not be permitted except in exceptional circumstances and where it can be demonstrated they are in the public interest, in accordance with the 'major developments test' in the NPPF (paragraph 116). Development within AONBs shall normally only be small-scale, to meet local needs and should be sensitively located and designed.*

This policy is clearly of specific relevance to the landscape consideration on the application, although only tentative/limited reference has been made to it by the objectors.

The policy sets out a series of requirements that must be addressed, as appropriate. To summarize, these are:

- Proposals should respect and enhance landscape character – based on the landscape character assessment.
- Proposals should include adequate mitigation of landscape impacts.
- If the proposal results in significant adverse landscape impact there should be compensatory landscape enhancements.
- Great weight will be given to conserving the landscape and scenic beauty of AONB and enhancing their natural beauty. Proposals within AONB or proposals that would significantly affect AONB shall demonstrate that they take this impact into account and that they have regard to the relevant AONB Management Plan.
- Major development in AONB will not be permitted expect in exceptional circumstances and where it is in the public interest (see NPPF requirement).
- Development within AONB shall normally only be small-scale, to meet local needs and sensitively located and designed.

The LVIA has made clear that the proposals, both during operations and as a consequence of restoration to soft-end uses, respect and enhance the landscape in the longer term. Landscape character assessment has been taken into account as part of the LVIA and the proposals include various mitigation measures which will ensure that any short-term impacts on the landscape are limited, temporary and kept to within acceptable levels – as required by minerals policy and the NPPF.

The landscape policy highlights the potential sensitivity of the AONB in regard to potential minerals development. At the same time, it actually makes clear that it is still possible to obtain planning permission for mineral development within an AONB, and permission could be granted where such development would significantly affect the AONB in landscape terms, providing: the significant impact is taken into account; regard is had to the AONB Management Plan; major developments pass the exceptional circumstances test (see NPPF); and , small scale developments meet local needs and are sensitively located and designed. This highlights that, whilst the AONB's are sensitive in landscape terms, there is a clear acceptance that impacts from mineral working in the AONB's could be accommodated, mitigated and outweighed by public interest needs.

The application proposals quite clearly do not conflict with the test/requirements of Policy C8 for the following reasons:

a. The proposed mineral extraction, processing and restoration operations are all situated outside of the AONB.
b. The proposed development does not significantly affect the AONB or its setting due to the factors and mitigation measures referred to under Policy M4 above and, importantly, the long-term landscape effect of the development on the setting of the AONB is positive due to the appropriate end uses that will be delivered.
c. Clearly the proposals are not a major minerals development. They are a short term, small scale scheme designed to make a swift contribution to aggregate supply from an area outside of the AONB that has be designated by the MWLP Core Strategy as a Strategic Resource Area for future sand and gravel supply to meet the County's ongoing aggregate requirements.
d. The LVIA makes clear that siting, design, mitigation and end use delivery have all been carefully considered to minimize the impact of the proposed mineral supply site, which is supported by a strong aggregate need case, particularly as the potential Oxfordshire Part II Site Allocations Plan is unlikely to be adopted for a considerable period.

Whilst there will be some impact during proposed operations, the scheme does not run contrary to Policy C8, which is the most relevant landscape related policy in relation to these proposals as it is a minerals policy, rather than a general policy drafted to deal with more permanent forms of built development and uses. The fact that policy C8 specifically requires mitigation and, potentially compensation, demonstrates (appropriately for a minerals landscape policy) that there is an acceptance that there will inevitably be some temporary impacts of a minerals site located in a countryside setting.

**Policy C9** – Historic Environment and Archaeology

The Policy states:

*"Proposals for minerals and waste development will not be permitted unless it is demonstrated, including where necessary through prior investigation, that they or associated activities will not have an unacceptable adverse impact on the historic environment.*

*Great weight will be given to the conservation of designated heritage assets: Blenheim Palace World Heritage Site; scheduled monuments; listed buildings; conservation areas; historic battlefields; registered parks and gardens; and non-designated archaeological assets which are demonstrably of equivalent significance to a scheduled monument; and the setting of those assets.*

*Where an application would affect a non-designated heritage asset, the benefits of the proposal will be balanced against the scale of harm to or loss of the heritage asset and its significance.*

*Where, following assessment of an application, the loss (wholly or in part) of a heritage asset is considered acceptable in principle, the applicant will be required to record and advance understanding of that asset, proportionate to the nature and level of the asset's significance, and to publish their findings.*

*Proposals for mineral working and landfill shall wherever possible demonstrate how the development will make an appropriate contribution to the conservation and enhancement of the historic environment."*

Where a development affects a heritage asset the policy indicates that benefits will be balanced against the scale of the harm or loss of a heritage asset and its significance. The policy therefore indicates that it is possible to have quite a significant level of harm providing the benefits outweigh that harm.
In the case of this proposal there is a considerable supply benefit (given the repeated shortfall in annual sand and gravel supply in Oxfordshire). At the same time the scale/level of potential impact is relatively limited with some visual impact on the setting of a limited number of listed buildings but for a relatively short time period followed by long-term complimentary end uses, including nature conservation adjacent to the river, which will contribute to the river valley scene and long-term

tranquility.

It is also worth noting that these listed buildings are sited on the opposite bank to the proposed mineral scheme, within the Carmel College site. As mentioned earlier, this site is the subject of planning permission for a significant new residential development that will involve both short term construction impacts as well as permanent landscape and setting change within the college grounds.

The proposed end uses of the mineral scheme will compliment the completed Carmel College development and will enhance the setting of that site and the listed buildings within it.

**Policy C10** - Transport

This policy has been considered under landscape policy considerations as a consequence of the Chilterns AONB Management Plan, under development policy DP4, making reference to HGV movements being a consideration in terms of impact upon the AONB (which is a landscape consideration).

The policy states:

*"Minerals and waste development will be expected to make provision for safe and suitable access to the advisory lorry routes shown on the Oxfordshire Lorry Route Maps in ways that maintain and, if possible, lead to improvements in:*

- *the safety of all road users including pedestrians;*
- *the efficiency and quality of the road network; and*
- *residential and environmental amenity, including air quality.*

*Where development leads to a need for improvement to the transport network to achieve this, developers will be expected to provide such improvement or make an appropriate financial contribution.*

*Where practicable minerals and waste developments should be located, designed and operated to enable the transport of minerals and/or waste by rail, water, pipeline or conveyor.*

*Where minerals and/or waste will be transported by road:*

*a) mineral workings should as far as practicable be in locations that minimise the road distance to locations of demand for the mineral, using roads suitable for lorries, taking into account the distribution of potentially workable mineral resources; and*
*b) waste management and recycled aggregate facilities should as far as practicable be in locations that minimise the road distance from the main source(s) of waste, using roads suitable for lorries, taking into account that some facilities are not economic or practical below a certain size and may need to serve a wider than local area.*

*Proposals for minerals and waste development that would generate significant amounts of traffic will be expected to be supported by a transport assessment or transport statement, as appropriate, including mitigation measures where applicable."*

It is also worth considering some of the supporting text to the policy, as follows:

Paragraph 6.57
*"The harm caused by the movement of minerals and waste by road can be reduced by encouraging the uptake of alternative transport methods such as rail, conveyor, pipeline and water. These alternatives can be practicable where movement of large quantities over long distances is involved or in particular local circumstances115. However, it may not be economically viable or practicable for quarries and waste facilities to use such alternatives where minerals are distributed mostly to local markets or where waste is produced and handled locally. For these reasons aggregates and waste in Oxfordshire are likely to continue to be transported mainly by road."*

Paragraph 6.58
*"Most of the traffic associated with minerals and waste development involves heavy goods vehicles, and it is important that sites have safe and suitable access to roads that are suitable for such traffic. Figure 13 shows the network of roads that make up the County Council's preferred routes for use by heavy goods vehicles to get to the major destinations across Oxfordshire (the Oxfordshire Lorry Route Map)."*

Paragraph 6.60
*"The harmful impact of lorry traffic in environmentally sensitive locations and settlements can be reduced by routeing agreements to control traffic movements. Such agreements will direct lorry traffic to and along the lorry route network (figure 13) taking into account road standard, settlements, road safety issues and other factors."*

Sand and gravel aggregate mainly serves local markets that will be requiring construction aggregate in any event. The planning application site is located, inevitably, where the mineral is found (the Thames valley). In this case, that river valley location (with operations sited outside the AONB) is close to the main centers of population, particularly: Oxford (to the north); Benson (to the north); Abingdon (north-west); Didcot (west), as well as Wallingford and Cholsey in closer proximity to the site. These areas, particularly the larger settlements, are the main locations where development demand for aggregate is likely to arise over the next 5 years or so and where the application site is likely to supply the bulk of its material to. Similarly, it is these areas where clean fill from construction projects is most likely to arise and be available for backfilling the worked-out phases of the application site, some of which may take place on a backhaul basis (i.e. combined with the mineral haulage). There is also a permitted housing development of 166 residential units and associated development at Carmel College, located close to the application site, which will potentially require construction aggregate in the same development timeframe. It can therefore be seen that the bulk of the sand and gravel, and the backfill material, will gravitate to local markets and the site is well located to serve those markets, meaning that road travel distances are minimized in accordance with the policy C10. The A4047 (towards Oxford) and the A4130 (towards Didcot) are part of the County's preferred routes for HGV's (as per figure 13 – Oxfordshire Lorry Route Map).

As per Policy C10 a Transport Assessment (TA) formed part of the original EIA/ES. It clearly evidences and demonstrates that

the impact of the HGV's from the proposals would have limited impact on the highway network as the potential increases in mineral/waste traffic are proportionately low and are temporary/short-term.

The TA has considered a notional split of traffic between the A4074 towards Oxford and the A4130 that heads east through the Chilterns AONB. Although it is anticipated that the majority of mineral will be supplied to the Oxford, Abingdon, Didcot, Wallingford markets the TA assumes a "worst case" of a 50/50 split between these two routes (thus assuming 50% of material being hauled into the AONB on the A4130 ). Even with a worst-case scenario the impact would only be a peak increase of 3 HGV's per hour on a route that is identified as a "preferred route" for HGV's in the County. Besides this low level of potential/ theoretical impact, account must also be taken of the fact that the sand and gravel supply is a temporary operation of a limited timescale of 5 years approximately. It should also be noted that a large part of the AONB lying to the east/south-east of the application site does not contain significant settlements/centres of population (certainly in comparison to those areas to the north and west of the application site). Therefore, in general, aggregate demand will normally be relatively low from the smaller settlements in the AONB as opposed to the larger day to day demand for aggregate in the more populated areas to the north and north-west of the application site.

These points are highlighted under this transport policy section as they are potentially relevant when consideration is given to the Chilterns AONB Management Plan – see later section of this document – which is a material planning consideration in the determination of the planning application.

**SOUTH OXFORDSHIRE LOCAL PLAN TO 2035 (2020)**
**Policy ENV1** – Landscape and Countryside

The Policy states:

*"1. The highest level of protection will be given to the landscape and scenic beauty of the Chilterns and North Wessex Downs Areas of Outstanding Natural Beauty (AONBs):*

- *Development in an AONB or affecting the setting of an AONB will only be permitted where it conserves, and where possible, enhances the character and natural beauty of the AONB;*
- *Development in an AONB will only be permitted where it is appropriate to the economic and environmental wellbeing of the area or promotes understanding or enjoyment of the AONB;*
- *Major development in an AONB will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest; and*
- *Development proposals that could affect the special qualities of an AONB (including the setting of an AONB) either individually or in combination with other developments, should be accompanied by a proportionate Landscape and Visual Impact Assessment.*

*AONB Management Plans will be a material consideration in decision making.*

*2. South Oxfordshire's landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where it protects and, where possible enhances, features that contribute to the nature and quality of South Oxfordshire's landscapes, in particular:*

*i) trees (including individual trees, groups of trees and woodlands), hedgerows and field boundaries;*
*ii) irreplaceable habitats such as ancient woodland and aged or veteran trees found outside ancient woodland;*
*iii) the landscapes, waterscapes, cultural heritage and user enjoyment of the River Thames, its tributaries and flood plains;*
*iv) other watercourse and water bodies;*
*v) the landscape setting of settlements or the special character and landscape setting of Oxford;*
*vi) topographical features;*
*vii) areas or features of cultural and historic value;*
*viii) important views and visually sensitive skylines; and*
*ix) aesthetic and perceptual factors such as tranquility, wildness, intactness, rarity and enclosure.*
*3. Development which supports economic growth in rural areas will be supported provided it conserves and enhances the landscape, countryside and rural areas.*
*4. The Council will seek the retention of important hedgerows. Where retention is not possible and a proposal seeks the removal of a hedgerow, the Council will require compensatory planting with a mixture of native hedgerow species."*

It is important to note that the Local Plan contains policies that apply to a broader range of development and uses and are not drafted to deal specifically with a minerals development.

Nonetheless, in the consideration of landscape matters concerning this planning application it is relevant to take account of Policy ENV1.

As already indicated, the operations proposed in the planning application (located outside of the Chilterns AONB) will have only a short-term and particularly limited impact at the edge of the AONB with mitigation measures ensuring that potential visual effects will have minimal impact on the setting of the AONB. The LVIA makes clear that there are no significant adverse effects on the important AONB receptors and the special qualities of the AONB (e.g. the chalk escarpment and panoramic views across it; ancient hedgerows and field trees; wooded landscapes; chalk grasslands and chalk streams and their valleys; and common land). The LVIA has followed guidance and accepted methodologies employed in the carrying out of LVIA and EIA.

The restoration end uses are appropriate to the site and its setting in the river valley and will make a long-term positive contribution to the landscape and to biodiversity. A considerable number of retained trees and lengths of hedgerow, along with the retention of the central ditch feature during working, will ensure rapid assimilation of the end-uses into the local landscape.

As indicated above, impact on listed buildings (cultural heritage) is of a limited nature and is short-term/temporary with the end uses ensuring that the setting of these buildings is preserved/enhanced in the longer-term.

It is accepted that there will be a short-term temporary visual impact along a relatively short stretch of the River Thames Path. The closest phases of the operation are where the mineral deposit is shallow and, therefore the working and restoration will be carried out quickly and progressively, with visual screening of the path section carried out using straw bales for a temporary period. The restoration and delivery of nature conservation habitats alongside the Thames Path will then ensure that there is a long-term benefit to the sures of the path with the development of flora and fauna that is appropriate to a low-lying wetland/floodplain location.

**THE CHOLSEY NEIGHBOURHOOD PLAN 2019**
**Policy CNP E1**

- *"Cholsey's landscape, countryside and rural areas will be protected against inappropriate development and where possible enhanced.*
- *Within the AONB (as shown on Map 2) great weight will be given to conserving landscape and scenic beauty. Development proposals for major development will not be supported in this area except in exceptional circumstances and where they can be demonstrated to be in the public interest.*
- *Elsewhere in the neighbourhood area development proposals will only be supported where it would promote small scale economic growth which promotes the conservation and enhancement of the countryside."*

The proposals are not inappropriate development. Minerals have to be worked where they lie in the countryside and the Oxfordshire Minerals Core Strategy Part 1 – confirms that the proposal site is situated within a Strategic Resource Area for future sand and gravel working in the Thames Valley to maintain sufficient aggregate supply. The proposal site is not in the AONB and does not have a significant effect on its setting.

**Policy CNP E2**

Proposals which improve opportunities for residents and visitors to informally enjoy Cholsey's riverside location, or which improve facilities for river-based sport or recreation and are compatible with CNP E1 and CNP E3 will be supported.

In the medium to long-term, post-extraction and progressive restoration, the application proposals will improve/enhance the enjoyment of users of the Thames Path with nature conservation uses alongside the path contributing to tranquillity as well as providing an additional section of informal path off the Thames Path.

**Policy CNP E3**
Development proposals should respect the landscape, waterscape, cultural heritage and user enjoyment of the River Thames, its tributaries, floodplains, the Rideway and the Thames Path. Insofar as planning permission is required proposals for mooring stages, posts, earthworks or river facing banks with piles and planking outside the built-up area boundary will not be supported.

The application proposals have been designed to limit/minimise impact on Thames Path users. The adjacent phases of working and restoration will be short-term temporary and will be set back from the path and screened. Post working and restoration they will be restored to nature conservation which will enhance the local landscape alongside the River Thames.

**THE CHILTERNS AONB MANAGEMENT PLAN 2019-2024**
The Management Plan sets out a series of special qualities of the Chilterns AONB. These include:

- A dramatic chalk escarpment.
- Panoramic views across the escarpment.
- Intimate dip slope valleys and rolling fields.
- Significant ancient hedgerows and field trees.
- Wooded landscapes.
- Concentrations of chalk grassland with diverse flora and fauna.
- Nine chalk streams.
- Large areas of Common Land.
- Relative tranquility but with accessibility.
- A network of National Trails, including the Thames Path.
- Distinctive buildings and attractive villages.

The LVIA demonstrates that there is no evidence to indicate that these features, or their setting, will be significantly adversely impacted upon by the proposals. Any potential impacts will be, at worst, minimal and will be short-term/temporary. The site restoration and end-uses will make a long-term positive contribution to the landscape located outside and at the edge of the AONB.

The Management Plan, particularly in policies NP1-NP17 places significant emphasis on nature conservation, habitats and biodiversity within the AONB. There is no evidence to indicate that the proposals will have a negative impact upon any of these aspects of the AONB environment or the implementation of policies NP1 to NP17.

The Development Section of the Management Plan includes policy DP4. This requires that proposals for development in the setting of the AONB shall take full account of whether the proposals harm the AONB. The examples given are potential effects of development of land that is visible in panoramic views from the Chilterns escarpment, or which generate traffic in or travelling across the AONB, or which increases water abstraction from the chalk aquifer, thereby reducing flows in chalk streams.

The sand and gravel proposals will not be visible in panoramic views from the Chilterns escarpment.

The earlier section on transport policy C10 of the Oxfordshire Minerals and Waste Local Plan Part 1 Core Strategy (2017) indicates that the main development/construction markets for the supply of the sand and gravel in the application site are located outside of the AONB in areas containing larger settlements with future growth planned. By contrast the AONB settlements are generally smaller/less populated and large parts of the AONB are unlikely to give rise to significant demand for sand and gravel aggregate, although some need/demand may arise from time to time. A large proportion of the proposed

mineral traffic is therefore anticipated to supply markets outside the AONB to the north and west of the application site. Even on a "worst case" assumption used in the Transport Assessment (where 50% of traffic would travel into the AONB on the A4130), the proposals would only lead to a relatively low proportional increase in HGVs on that road, which is in any case an identified HGV route. It is also relevant to note that any potential effect will be of a temporary nature and will last for a relatively short duration. In any case, any sand and gravel supplied into the AONB will be serving markets/development in the AONB that will require aggregate from any available source. In other words, any transport of mineral into the AONB is demand led and will take place in any event.

The evidence submitted with the planning application demonstrates that the potential impact of HGV traffic from the proposals on the AONB is likely to be low-level, temporary and for a short duration. If the proposed sand and gravel extraction did not take place mineral/aggregate demand within the AONB would be met from other sources and there would be resultant short-term HGV movements into the AONB. The level of mineral HGV impact in the Chilterns AONB will therefore be governed by the level of development and demand that exists within the Chilterns, rather than the potential supply of sand and gravel from the proposal site, which is more likely to supply material to areas outside the AONB, unless there is a specific need for sand and gravel from within the AONB which needs to be met.

The sand and gravel proposals will provide a contribution to the aggregate landbank located outside the AONB (as per the requirement of the NPPF, mentioned earlier) and will be well placed to serve local markets situated outside the AONB, where demand is likely to be high. It's likely impact on the AONB is considered to be low, temporary and short-term and any traffic would utilize the County Council's preferred HGV route within the AONB – the A4130. The proposed development will not therefore result in an unacceptable HGV impact on the Chilterns AONB beyond that which will occur, in any event, as a consequence of development taking place in the AONB demanding sand and gravel during the lifetime (5 years approximately) of the proposed site.

The proposed development will not impact on the chalk aquifer as the extraction will take place within a different geological sequence.

As stated, the LVIA makes clear that there are no significant adverse effects on AONB receptors. The LVIA has followed accepted procedures and meets the standards of GLVIA for a development that is located outside an AONB but has the potential to affect its setting. There is no evidence to indicate that there will be an unacceptable effect on the Chilterns AONB setting.

**OVERVIEW**

The analysis makes clear, having regard to the available evidence, including the original LVIA and the further landscape information contained in this document, that the proposals, in landscape terms, accord fully with the requirements and tests contained in Development Plan policy concerning landscape considerations for a mineral site of this scale, nature and location. The analysis also demonstrates that the proposals, in landscape terms, accord with the requirements set out in policy documents that are "material considerations" in the determination of the Planning Application – specifically the NPPF (2021) minerals and related AONB policies and the Chilterns AONB Management Plan. There are, therefore, no landscape grounds for sustaining a planning objection to the proposed mineral workings.