

Planning

Head of Service: Adrian Duffield



Listening Learning Leading

Via email

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Abbey House, Abbey Close
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14 October 2021

Ref: P21/S3961/CM

Dear Ms Hudson,

Location: White Cross Farm, Wallingford

Proposal: Extraction and processing of sand and gravel including the construction of new site access roads, landscaping and screening bunds, minerals washing plant and other associated infrastructure with restoration to agriculture and nature conservation areas, using inert fill. Any comments before the 16 October 2021.

Thank you for consulting the District Council on above application. I am still awaiting responses from the Council's internal specialist consultees and will write again with these in due course. However, in order to meet the 16 October 2021 deadline for a response I set out my assessment of the application so far. In summary, the District Council **Objects** to the proposed application for the reasons set out below.

There have been previous applications on this site for gravel extraction and restoration of the site as a 280-berth marina. The latest application for the site (MW.0033/18) was refused for multiple reasons relating to a lack of need for a marina; landscape impact; heritage impact; design; loss of best and most versatile agricultural land; accessibility for non vehicular modes of transport; impact on air quality, pollution and human health; flood risk; impact on groundwater and impact on the enjoyment of the existing recreational users of the river.

In their application, the applicant has stated that the reasons for refusal "focused particularly on the marina end-use, with limited concern raised over the enabling mineral development". I do not consider this to be an accurate representation as many consultees raised objection to both the marina and the mineral extraction element of the proposal.

Planning Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the development plan, unless material considerations indicate otherwise. Since the previous application was determined the South Oxfordshire Local Plan (SOLP) 2035 has been adopted. Below is the list of policies from the SOLP that I consider to be relevant to the consideration

of this application:

STRAT1: The Overall Strategy
WAL1: The Strategy for Wallingford
TRANS2: Promoting Sustainable Transport and Accessibility
TRANS4: Transport Assessments, Transport Statement and Travel Plans
TRANS5: Consideration of Development Proposals
TRANS7: Development Generating New Lorry Movements
INF4: Water Resources
ENV1: Landscape and Countryside
ENV2: Biodiversity – Designated Sites, Priority Habitats and Species
ENV3: Biodiversity
ENV4: Watercourses
ENV5: Green Infrastructure in New Developments
ENV6: Historic Environment
ENV7: Listed Buildings
ENV9: Archaeology and Scheduled Monuments
ENV11: Pollution – Impact from Existing and/or Previous Land Uses on New Development (Potential Receptors of Pollution)
ENV12: Pollution – Impact of Development on Human Health, the Natural Environment and/or Local Amenity (Potential Sources of Pollution)
EP1: Air Quality
EP3: Waste Collection and Recycling
EP4: Flood Risk
EP5: Minerals Safeguarding Areas
DES6: Residential Amenity
DES7: Efficient Use of Resources
CF1: Safeguarding Community Facilities

The site is within the Designated Area for the Cholsey Neighbourhood Plan (CNP), which was made (adopted) in April 2019 and therefore forms part of the Development Plan. The following policies in the CNP are relevant to the application:

CNP STRAT 1
CNP E1
CNP E2
CNP E3
CNP E4
CNP T1

Principle of Development

The Oxfordshire Waste and Minerals Local Plan Part 1 – Core Strategy Policy M4 clarifies the criteria of the most suitable locations for working aggregate minerals. In relation to these:

a) The quality and quantity of the resource

This is not my area of expertise but in comparing the amount of gravel to be extracted to the proposals at New Barn Farm, Cholsey, it seems relatively little gravel can be taken from the proposed site. The proposed site proposes around 15.5 hectares producing around 550,000 tonnes of gravel. In comparison, the extraction at

New Barn Farm, a short distance away will provide 2.5 million tonnes from a 34 hectare site. This means that the proposed site will be just under half the size of the New Barn site but will only provide less than a quarter of the gravel. I therefore question whether the amount to be extracted is that significant and whether it would be financially viable without the marina end use.

b) priority for extension to existing quarries;

This will be an entirely new quarry.

c) potential of restoration and after-use;

Restoration would involve the creation of biodiversity habitats including a small lake and wetlands area. However, the site already contains Conservation Target Areas and BAP Priority Habitats so I question how much of a benefit this restoration really is.

d) suitability and accessibility of the primary road network;

I leave this for the appropriate officers at the County Council to provide comment. However, Policy TRANS7 of the SOLP states that proposals for development leading to significant increases in lorry movements should only be permitted in locations where the increase can be accommodated on the surrounding road network, the opportunities for sustainable transport access have been maximised and the development does not result in adverse environmental effects on the surrounding area. I question whether it meets criterion one but it certainly doesn't meet two or three.

e) proximity to large towns and other locations of significant demand to enable a reduction in overall journey distance from quarry to market;

The site is located close to Wallingford, one of the market towns in the District, which will be seeing some growth. However, it is not the primary focus of growth for the area, which is the Science Vale area.

f) ability to provide more sustainable movement of excavated materials;

The only way to move excavated materials from this location is via road.

g) avoidance of locations within or significantly affecting an Area of Outstanding Natural Beauty;

The Chilterns AONB in this location starts on the western bank of the River Thames, therefore the site is immediately adjacent to, if not in some small part within, the AONB.

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;

The site is not near any such locations.

i) avoidance of locations likely to have an adverse effect on the significance of designated heritage assets;

There are three listed buildings associated with Carmel College on the other side of the River.

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

i. locally designated areas of nature conservation and geological interest;

The site is within the Thames Wallingford to Goring Conservation Target Area.

ii. non-designated heritage assets;

None known.

iii. local landscape character;

Site is in the setting of the AONB and the setting of both Cholsey and Wallingford. The site is also very prominent from the A4130 as it is elevated as it crosses the River.

iv. water quality, water quantity, flood risk and groundwater flow;

Gravel extraction has the potential to alter the water quality and groundwater, given its location on the River Thames.

v. best and most versatile agricultural land and soil resources;

Grade 4 (Poor) closest to the River, Grade 2 (Very Good) closest to the A329.

vi. local transport network;

For OCC Highways Officers to comment.

vii. land uses sensitive to nuisance (e.g. schools & hospitals);

On the other side of the A329 Reading Road is a nursery and preschool, the site will be around 15m away. The nursery would be affected by noise and dust.

viii. residential amenity & human health; and

Approximately 250m to the east of the site is the former Carmel College, which has planning permission for conversion to 166 residential dwellings. This would be affected by both the gravel extraction and by the marina.

ix. character and setting of local settlements;

Site is close to Wallingford and Cholsey.

On the basis of this brief summary, I would suggest that the proposal is not in accordance with this policy and the principle of development is not supported.

Landscape Impact

Paragraph 176 of the NPPF affords great weight to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty. It further states that "*development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.*"

SOLP Policy ENV1 states that development affecting the setting of an AONB will only be permitted where it conserves, or where possible, enhances the character and natural beauty of the AONB. It also states that *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... the landscapes, waterscapes, cultural heritage and user enjoyment of the River Thames... areas or features of cultural and historic value...aesthetic and perceptual factors such as tranquillity, wildness, intactness, rarity and enclosure."

I would like to point out that the LVIA refers to the South Oxfordshire Landscape Character Assessment 2003 but a more update to date Character Assessment for

the District was published in 2017. The content of these documents is largely the same.

Throughout the LIVIA I consider that the impact of Stage A (gravel extraction) has been understated and the impact of Stage B (restoration) has been overstated. This is supported by the Council's Landscape Officer, who states that:

"The LVIA finds an effect of moderate adverse significance on the local landscape character type during the mineral extraction and restoration phases, and also an effect of moderate adverse significance on the AONB. The significance of benefits after restoration for the AONB is the same as the adverse effect, or in the case of the local landscape character type, the significance of the benefit after restoration is stated to be greater than the adverse effect during extraction; this seems unrealistic. Whilst restoration proposals represent some enhancement of the landscape, they are not dissimilar in form to the existing landscape structure. Visual effects during operation, even from the Thames Path within the site, are noted to be no higher than moderate adverse, with benefits after restoration again as high as adverse effects during extraction. There are noted to be no significant adverse effects. I did not find any photomontages to illustrate the effect of the proposals. Overall, benefits seem overstated and adverse effects understated."

Below are some examples of this:

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."*

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 do not agree with the LVIA Assessment of the site that it has "low intervisibility". And that the site has strong landscape boundaries. The site is clearly visible from the north, south and east. The strongest site boundary is the western boundary along the Reading Road, but there is clear visibility through the boundary hedge, particularly in the winter and at the site access. The site is very visible by a great many people along the A4130, the Thames Path and the River Thames itself. In light of all of the above, I would suggested that the overall effect of Stage A on the landscape character to be high adverse.

The Assessment of the Stage B has overestimated its beneficial effects on all counts. The creation of new shallow ponds and scrapes and associated sparse native vegetation structure may have a high beneficial magnitude when compared with how it will look after gravel extraction has taken place; however, the site currently has habitats that are characteristic of their location by the River, and these habitats are locally recognised. So I would suggest that they represent a low beneficial magnitude of effect at best. Similarly, the change to the landscape character should theoretically be minimal compared to how the site currently appears, as it is already characteristic of flood plain. Therefore the effect on landscape character should be neutral. I would not consider the addition of signage on the Thames Path to be a medium beneficial magnitude, rather a low beneficial magnitude. Overall I would suggest the magnitude of effect from restoration to be low beneficial. This needs to be reflected in Table Two Furthermore, given the immediate proximity of the Chilterns AONB I would expect the magnitude of impact on it during Stage A to be significantly higher than “Low Adverse”. The conclusions at paragraph 5.49 that there will not be a significant effect on the landscape character of the site during Stage A is clearly incorrect because the magnitude of effect has been underestimated.

As explained above, 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 suggested screening for the site includes bunds, strengthening of tree planting around the boundaries and temporary hay bales on the inner side of the Thames Path. I do not think much weight can be attached to these methods of screening. Given the temporary nature of the extraction, the strengthening of tree planting is unlikely to have a significant effect during the operational years. Hay Bales are unlikely to provide an effective screen for something that is 14m high and they also are unable to provide any kind of acoustic function. Whilst hay bales may be a regular occurrence in agricultural settings I think their placement so close to the river and the amount of them required to create a screen would be incongruous in views from the River and the Thames Path in particular. Bunds along to the south west of the site boundary will be incongruous, intrusive and will also not provide enough screening to cover the height of the plant machinery. Furthermore there has been no acknowledgement of the increased visual impact that the exit from the site onto the A4130 will have, particularly on users of that road.

SOLP Policy ENV1 states that development will only be permitted where it protects, and where possible enhances, features that contribute to the nature and quality of South Oxfordshire’s landscape, in particular trees (including individual trees, groups

of trees and woodlands), hedgerows and field boundaries. I will leave comments on the specifics of tree loss and restoration to the District Council's Forestry Officer but the proposal involves the loss of a significant number of trees, which is contrary to ENV1.

Overall I do not consider that the proposal will be in accordance with paragraph 176 of the NPPF or SOLP Policy ENV1. The development would not be sensitively located and is not designed to minimise adverse impacts on the Chilterns AONB. The development would be harmful to South Oxfordshire's landscape and countryside and would not protect or enhance the landscape, waterscape, cultural heritage and user enjoyment of the River Thames in particular. Furthermore it would not protect features of cultural and historic value or aesthetic and perceptual factors such as tranquillity and wildness.

In relation to the Cholsey Neighbourhood Plan, the proposal would not be in accordance with Policy CNP E3, which states that *"Development proposals should respect the landscape, waterscape, cultural heritage and user enjoyment of the River Thames, its tributaries, floodplains, the Rideway [sic] 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."*

As the proposal would involve earthworks I would suggest that it is directly contrary to this policy and, as shown above, it would not respect the landscape etc. The supporting text for the policy explains that informal recreation is the main way that residents and visitors will enjoy the riverside area. Proposals that support this objective will be supported and proposals that cause damage to the riverside environment or its tranquil character will be resisted.

In previous assessments for the Oxfordshire Waste and Minerals Local Plan Part 2, the County's Landscape Officer recognised that the mineral extraction and marina previously proposed would adversely impact on the Chilterns AONB. It was stated that *"Overall the landscape and visual impact of this allocation is expected to be substantial due to permanent loss of characteristic features, the impacts on the Chilterns AONB, the impact on high-sensitive users of the Thames Path and the River Thames, and adjacent roads, and the potential impact on the separation between settlements. Site has also potential to affect the setting of the North Wessex Downs AONB (eg through activity and lighting)."*

Some of these effects are no longer relevant as the marina is proposed, but the impacts on the Chilterns AONB, the users of the Thames Path and River Thames, adjacent roads and separation between settlements remain relevant for this application. Therefore the site is still contrary to policy and unsuitable for mineral extraction.

The Council's Landscape Officer has provided the following conclusion in relation to the development:

"Due to the sensitive location of the site and the nature of the proposals, there would be adverse landscape and visual impacts, including adverse effects on the setting of

the River Thames, the Thames Path and the Chilterns AONB. The LVIA finds a moderate adverse effect on the AONB during extraction, this would conflict with policy ENV 1 of the Local Plan which gives the highest level of protection to AONB's, development in or affecting the setting of an AONB is only permitted where it conserves and where possible enhances the character and natural beauty of the AONB. There would also be conflict with the aim of Policy ENV 1 to protect the countryside, including the landscape and user enjoyment of the River Thames. The temporary nature of the proposals does not necessarily overcome these conflicts. The site is not allocated and has come forward in advance of the new Oxfordshire Minerals and Waste Plan, it has not been considered against possible alternative sites, which may be less sensitively located and have less adverse landscape and visual impact."

Heritage

I support the comments made by Historic England in relation to the setting of the listed buildings at Carmel College, particularly in the assessment of other sites suitable for sand and gravel extraction. SOLP Policy ENV7 states that proposals that affect the setting of a listed building will be expected to conserve, enhance or better reveal those elements which contribute to the heritage significance and/or its setting and should respect any features of historic interest, including the historic context such as its setting.

The representation from Historic England emphasises the importance of the river setting in revealing the significance of the grade II* boathouse and grade II listed Church of St Johns. Such significant engineering works within the setting will not be conserved, enhanced or better revealed and it will not respect the setting as a feature of historic context. Though hay bales are proposed to screen the development from the river, this is woefully inadequate in mitigating the harm caused by the development on the setting of the listed buildings.

SOLP Policy ENV7 also states that development proposals that would result in less than substantial harm to the significance of a listed building will be expected to minimise harm and avoid impacts; and should identify any demonstrable public benefits or exceptional circumstances in relation to the development proposed. The Committee Report for the previous application MW.0033/18 stated that there was a need for sharp sand and gravel at that point in time and therefore great weight should not be given to the ability of the proposed development to contribute to Oxfordshire's land bank. Further reserve will be allocated in the Oxfordshire Minerals and Waste Local Plan: Part 2 (Site Allocations) (OMWLP Part 2), which is currently assessing sites for suitability. This site has been submitted as part of that process and its suitability will be weighed against alternative sites. In previous site assessments for the OMWLP Part 2 the site has been categorised as unsuitable for development as it is contrary to the South Oxfordshire Core Strategy (which was part of the Development Plan at the time). This remains the case and other sites will be less constrained and therefore more suitable for development.

Environmental Concerns

The Council's Environmental Health Officers will comment on this in more detail but I would like to raise a few concerns. The Noise and Air Quality Assessments were both done more than five years ago, which means that the baseline against which to

assess the proposals is out of date. This should be updated to more accurately reflect the current situation.

Both of the assessments include mitigation measures that are vague and cannot be controlled or enforced against in order to keep effects to a minimum. For example, in the Air Quality Assessment it states that the on-site transportation is said to have a small-scale impact, but this is based measures such as vehicle speeds, and the maintenance of roads. Similarly, the Noise Assessment refers to measures such as minimising drop heights of materials, starting up plant and vehicles sequentially. Whilst these sorts of measures might be best practice they cannot be relied upon to mitigate against harmful effects and a worst case scenario should be considered without these measures.

The Air Quality Assessment refers to Elizabeth House as a residential property, which is incorrect as it is a nursery and preschool with over 135 children in attendance. The effects of the extraction on the nursery, and on so many sensitive receptors, has therefore not been properly assessed. It also states that the site is 73m from Elizabeth House, when it is actually more like 60m. Furthermore, the woodland area at the front of the nursey is regularly used by the children for forest school, and therefore the receptors will spend extended periods of time within 15m of the site, which is not recognised in the Noise or Air Quality Assessments.

Conclusion

South Oxfordshire District Council objects to the proposed mineral extraction at White Cross Farm. The site is not necessary to meet the sharp sand and gravel targets going forward. The process for deciding on the most suitable site for mineral extraction should be through the OMWLP Part 2 and the site assessment process, which will look at all of the alternatives together. This site has several constraints, which mean that it is unlikely to be the most suitable site. Furthermore, I do not believe that the site will yield a significant amount of minerals to justify the harm the proposal would cause.

The site is situated on the banks of the River Thames, immediately adjacent to the Chilterns AONB and within it setting. The proposed development would be harmful to the Chilterns AONB, the landscape character of the site and would be visually intrusive to users of the River, the Thames Path and the elevated sections of the A4130. The submitted LVIA underestimates the impact of the gravel extraction and overestimates the benefits of the mitigation proposed and of the restoration of the site. The proposed development is contrary to SOLP Policy ENV1 and CNP Policy E3 and planning permission should be refused.

The River Thames and its banks have historical significance in the setting of the three listed buildings at Carmel College. Such significant engineering works within the setting will not conserved, enhance or better reveal it and it will not respect the setting as a feature of historic context. The development would not minimise harm and avoid impacts. Furthermore, no public benefits or exceptional circumstances have been presented in relation to the proposed development. The proposal is therefore contrary to SOLP Policy ENV7.

Concerns are also raised regarding the adequacy of the submitted Noise Assessment and Air Quality Assessment as they were undertaken five years ago and therefore do not provide an up-to-date baseline in assessing the application. The Air Quality Assessment fails to recognise that opposite the site is a nursery and preschool, not a residential development, and that these children spend a high proportion of their time outside, in some cases just 15m from the site. Both assessments set out mitigation measures that are unenforceable and therefore cannot be taken into account in assessing the impact of the proposals.

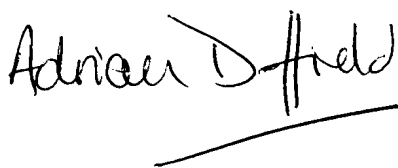
Overall I consider the harm of the proposal significantly outweighs the benefits and therefore planning permission should be refused.

I am sure that you have already done so, but I would recommend that the Environment Agency, Natural England and Thames Water are consulted on the proposals. As requested, the District Council did not carry out any external consultations. However, we have received 46 comments from local residents at the time of writing. These responses can be found on the Council's website here:

<https://data.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P21/S3961/CM>

If the County Council is minded to approve the application I would request that the District Council is able to have input into the conditions attached to the scheme. We would like to continue to work with officers at the County Council in assessing this planning application. Please do not hesitate to contact Katherine Pearce if you require any further assistance.

Yours sincerely,



Adrian Duffield
Head of Planning

Planning Application Response

Landscape

To: Mary Hudson

From: Haidrun Breith, Landscape Officer, Oxfordshire County Council

Site: White Cross Farm, Reading Road, Cholsey, Oxfordshire

Detail: Extraction and processing of sand and gravel including the construction of new site access roads, landscaping and screening bunds, minerals washing plant and other associated infrastructure with restoration to agriculture and nature conservation areas, using inert fill

Application number: MW.0115/21

Date sent: 20th October 2021

Recommendations: **Objection.**

The proposal

Extraction and processing of sand and gravel including the construction of new site access roads, landscaping and screening bunds, minerals washing plant and other associated infrastructure with restoration to agriculture and nature conservation areas, using inert fill.

Key Landscape planning policy

NPPF (2021)

- Para 174 a) requires planning decisions to contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes
- Para 174 b) requires planning policies and decisions to contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside.
- Para 176 requires that great weight is given to conserving and enhancing the landscape and scenic beauty in Areas of Outstanding Natural Beauty.
- Para 177 requires permission for major development in the AONBs to be refused other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest.

Detail on what constitute major development for the purposes of para 176 & 177 is provided in footnote 60. It states that whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

Oxfordshire County Council's Adopted Mineral & Waste Plan Core Strategy (MWPCS)

Policy C8: Landscape requires minerals and waste development to 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. It states further that great weight will be given to conserving the landscape and scenic beauty of Areas of Outstanding Natural Beauty (AONB).

Policy M10: Restoration of Mineral Workings requires mineral workings to be restored to a high standard and in a timely and phased manner to an after-use that is appropriate to the location and delivers a net gain in biodiversity.

South Oxfordshire DC Local Plan 2035

Policy ENV1 (Landscape and Countryside) gives highest level of protection to the landscape and scenic beauty of the Chilterns and the North Wessex Downs AONB. It requires that 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. It further seeks to protect the countryside and rural areas from harmful development by requiring development to protect, and where possible enhance, features that contribute to the nature and quality of the South Oxfordshire's landscape.

Policy ENV4 (Watercourses) requires development of land adjacent to a watercourse to protect and enhance the function and setting of the watercourse and its biodiversity. It requires a minimum 10m buffer zone along both sides of the watercourse to create a corridor favourable to the enhancement of biodiversity, and a Construction Management Plan prior to commencement of work for major development proposals which are located within 20m of a watercourse.

Policy ENV5 (Green Infrastructure in New Developments) requires development to protect or enhances existing Green Infrastructure and contribute towards the provision of additional Green Infrastructure.

AONB Management Plans

AONB Management plans are material consideration in the decision-making process (CROW Act 2000, section 85). The AONB Management Plans and position Statements for the Chilterns

AONB and North Wessex Downs AONB are of relevance due to the location of the site within the setting of both AONBs.

Policy DP3 of the Chilterns AONB Management Plan requires planning permission for major development in the AONB to be refused unless there are exceptional circumstances and there is a clear demonstration that it is in the public interest. As such it reiterates the requirements of paras 176 & 177 NPPF (2021).

Policy DP4 requires development within the setting of the AONB to take full account of whether proposals would harm the AONB. This could for example include development of land visible in panoramic views from the Chilterns escarpment, or which generates traffic in or travelling across the AONB, or which increases water abstraction from the chalk aquifer, thereby reducing flow in chalk streams.

Chilterns AONB Position Statement – Development affecting the setting of the Chilterns AONB.

Cholsey Neighbourhood Plan

The Cholsey Neighbourhood Plan includes policies and considerations that are relevant to the site. These include amongst other things the protection of the rural setting and surrounding countryside from inappropriate development.

Landscape Character background

Background information on the local landscape character can be found in Oxfordshire Wildlife & Landscape Study (OWLS), SODC Landscape Character Assessment (2017), the management plans of the Chilterns AONB Conservation Board and the North Wessex Downs AONB, and the Cholsey Neighbourhood Plan. These also offer recommendations of how the local character can be conserved and strengthened.

OWLS:

The western, slightly higher lying part of the site lies within the Landscape Character Type: Terrace Farmland and the Local Landscape Character Area: Wallingford (WH/29). The eastern part lies within the Landscape Character Type: River Meadowlands and the Local Landscape Character Area: Lower River Thames (WH/1).

The key characteristics for the Terrace Farmland include low-lying gravel terraces, large regularly shaped field patterns and localised tree lined ditches. Key characteristics for the River Meadowlands include flat, low-lying topography, seasonally flooded alluvial floodplains, grazing meadows, small fields of pasture and riparian character with strong pattern of riverside willows and tree-lined ditches.

Landscape Strategy recommendations comprise the strengthening of hedgerows, hedgerow trees and water courses, and the conservation of the tranquil, small-scale, intimate pastoral character and visual unity of river corridors. Related to this biodiversity recommendations seek the safeguarding of surviving priority habitats and the maintenance and enhancement of locally important habitats in a way that is appropriate to the landscape character of the area.

SODC LCA (2017):

The site is located in Landscape Character Area 4 - River Thames Corridor and Landscape Type Flat floodplain pasture. It highlights in its guidelines (p100) for mitigation of mineral extraction that visual impacts should be minimized by judicious planting of characteristic species. It also states the requirement for sympathetic restoration and management, and the need to maintain high standards of restoration of gravel pits to accommodate a range of after-uses that integrate successfully with the character of the surrounding landscape.

Historic Landscape Characterisation (HLC)

The HLC identifies the site as a frequent and often historic part of the landscape which contributes to the character of an area by shaping patterns of landscape use. It further considers that development is highly likely to have a significant impact on the landscape character.

Landscape comments:

The site is located south of the A4130 Wallingford bypass, southwest of where the road crosses the River Thames. The western boundary of the site is defined by the Reading Road (A329), whilst the River Thames and a woodland belt define the eastern and southern boundaries respectively.

The site comprises 19 ha of predominantly agricultural land of coastal grazing marsh with some arable use being found on the slightly higher-lying southwestern part of the site. The northern, western and southern boundaries are vegetated with trees and hedgerows, a section of hedgerow and a number of individual trees are also found within the site. With the exception of the vegetated boundaries the site is largely open allowing views across the site.

Despite traffic noise from nearby roads being audible (especially the A4130) I consider the application site to be rural in character and to reflect many of the characteristics outlined in relevant landscape character assessments. Most built development appears to take place north of the ring road except for a solar farm west of Reading road, which is reasonably well screened.

The site is in close proximity of two national designated landscapes, the Chilterns AONB and the North Wessex Downs AONB. The boundary of the Chilterns AONB runs along the western

bank of the River Thames and as such the application site directly adjoins the Chilterns AONB. The Planning statement also highlights that a minor part of the site falls into the Chilterns AONB. The North Wessex Downs AONB can be found only a short distance to the West and South of the site.

Landscape and Visual Impact Assessment (LVIA)

An LVIA by KEDD Limited has been submitted as part of the application to assess the landscape and visual impacts of the proposal. It concludes that the proposed development will not result in any significant adverse landscape or visual effects. It also concludes that the proposed development will not result in any likely cumulative adverse effects in combination with either existing or proposed developments (LVIA, para. 8.21).

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.

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.

Tree survey

A tree survey to BS5837:2012 standard from 2016 has been submitted but this appears not to have been updated from the previous application. The tree survey states that the central

hedgerow will be removed to enable extraction, but the planning statement suggests that the hedgerow and trees within the centre of the site will be retained. Clarification is required.

It is also important that the root protection areas (RPA) of trees and mature hedgerows are not adversely impacted on by excavations and/or the storage of materials (including bunds) Further information is required on root protection areas, buffers and how vegetation will be protected.

Impact on the Chilterns AONB

The boundary of the Chilterns AONB runs along the western bank of the River Thames and therefore directly adjoins the application site. A small section in the northeastern corner of the site is also located within the AONB. The development seeks a 30m buffer between the extraction boundary and the River Thames, which will avoid development within the AONB boundary and which will also enable the retention of the Thames Path during operation.

AONBs are nationally important landscapes and the NPPF requires that great weight is given to conserving and enhancing the landscape and scenic beauty in Areas of Outstanding Natural Beauty (para. 176).

Policy ENV1 of the SODCLP gives highest level of protection to the landscape and scenic beauty of the Chilterns and the North Wessex Downs AONB. It requires that development in an AONB or affecting the setting of an AONB should only be permitted where it conserves, and where possible, enhances the character and natural beauty of the AONB.

The importance of the AONBs and their settings is also reflected in MWP Core Strategy policy C8 and its supporting text (para. 6.44), which states: *The setting of and views associated with the Chilterns, Cotswolds and North Wessex Downs AONBs should also be taken into account in considering development proposals.*

Details of potential impacts affecting the AONBs are outlined in the Chilterns AONB Management Plan (policy DP4) and in the Chilterns AONB position statement on Setting. The setting of an AONB is not a fixed geographical boundary but is the area within which a development by virtue of its nature, size, scale, siting and materials could be considered to have an impact on the natural beauty and special qualities of the AONB (Chilterns AONB position statement).

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.

Thames Path

The Thames Path, a national long-distance trail, runs along the western bank of the River Thames and therefore within the site boundary. The path is proposed to be retained throughout the development, with the quarry being set back by 30m from the western bank of the river.

The importance and value of National Trails has been highlighted in the findings of the Glover Review, which recommends the integration of National Trails into a family of National Landscapes, which also contain AONBs and National Parks. If the recommendations were to be adopted by the government, National Trails could be given the same status and protection as AONBs.

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.

Restoration

Overall, the proposed concept restoration to agricultural land and nature conservation looks acceptable in landscape terms. The scheme appears to also aim for a net increase in biodiversity, which would be welcomed in landscape and policy terms, but this should be confirmed by the County Council's ecologist.

Further information on the type and source of the infill material and on a detailed landscaping scheme will be required should the development be approved.

Conclusion:

The development would introduce a highly industrial use that is associated with noise, dust, heavy machinery and HGV movements into an area that is currently rural in character and which provides a setting to the Chilterns AONB. I consider that the proposal will by its nature adversely affect the local character and views (including the AONB) and will significantly affect the views and experience of users of the Thames Path.

I am also concerned about the indirect impacts the development might have on the nearby AONBs with regard to affecting the tranquillity of the Chilterns AONB and NWD AONB eg through operational noise and increases in HGV traffic.

Whilst I recognise that the application is an improvement from the previous proposals and that impacts would be temporary, I consider the development to be in conflict with national and local landscape policies, and I can therefore not support the application.

Without prejudice, if the development was to be approved further information and conditions will be required.

I also recommend that SODC, the Chilterns AONB and NWD AONB Conservation Boards are also consulted on this application.

Comment for planning application MW.0115/21

Application number	MW.0115/21
Name	Dr Michael Stubbs - Chilterns
Address	The Chilterns Conservation Board The Lodge Station Road Chinnor Oxon OX39 4HA
Type of Comment	Objection
Comments	<p>Extraction and processing of sand and gravel including the construction of new site access roads, landscaping and screening bunds, minerals washing plant and other associated infrastructure with restoration to agriculture and nature conservation areas, using inert fill</p> <p>Land at White Cross Farm, Reading Road, Cholsey, Oxfordshire</p> <p>MW.0115/21</p> <p>CCB Objection</p> <p>The Chilterns Conservation Board (CCB) previously objected to the marina / inert fill restoration proposal (reference MW.0033/18 and CCB's objection dated 1st June 2018). For ease of reference, we set that out below.</p> <p>The same policy framework is largely in place, including the same statutory and policy protection for the AONB, including the duty of regard in the CROW Act at section 85 and in the Minerals and Waste Local Plan. What has changed is the adoption of a new SODC South Oxfordshire Local Plan in December 2020 and policy ENV 1, a new AONB Management Plan 2019-2024 and the additional reference to the setting of the AONB in the July 2021 NPPF at its 176. In essence, the setting of the AONB is highly material and great weight can be attributed to this when the planning authority come to strike the planning balance on the merits.</p> <p>This proposal harms the AONB during the operational and restoration periods. Harm to the setting will be clear, with a denuded and quasi- industrial landscape juxtaposed with the AONB. Walkers along the Thames Path will experience an AONB highly protected landscape on one side of the Thames and an extensive minerals extraction on the other. Some glimpsed views will be apparent from The Ridgeway national trail as it passes through Mongewell, albeit the former Carmel College will screen some of these views. Nevertheless and when taken overall the setting of the AONB will be harmed and great weight must be attributed to this.</p> <p>Further, alternatives exist, and the site is not allocated in the Waste and Minerals Local Plan. This site is part of a wider area of search for a yet to determine site selection process. The AONB will be a key criterion in such site selection. Clearly when the Chilterns Conservation Board is consulted on that part 2 site selection document, we will push for alternative and less harmful sites. This application is thus premature. Harm follows to the AONB.</p> <p>To update the previous policy position, we would also now identify</p> <p>The NPPF (2021) at 176, 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 adverse impacts on the designated areas.</p> <p>The AONB Management Plan 2019-2024 on matters of setting, DP4 In the setting of the AONB, take full account of whether proposals harm the AONB. For example, development of land visible in panoramic views from the Chilterns escarpment, or which generates traffic in or travelling across the AONB, or which increases water abstraction from the chalk aquifer, thereby reducing flow in chalk streams. A development outside the AONB boundary can cause harm to the AONB, even if it is some distance away. The local authority's legal duty towards the AONB49 applies when a proposal affects land in the AONB, regardless of where that effect originates (inside or outside the AONB). We have produced special advice in a Position Statement on Development Affecting the Setting of the Chilterns AONB50. The setting of the AONB is not a geographic zone that can be mapped, nor does it cover a set distance from the AONB boundary. Tall structures like chimneys that break the skyline or large growth proposals even far away can have an impact on the AONB, and so fall within the setting. Adverse impacts are not only</p>

visual, a noisy development may impact adversely on the tranquillity of the AONB even if not visible from the AONB. We consider that the setting of the Chilterns AONB is the area within which development and land management proposals (by virtue of their nature, size, scale, siting, materials or design) may have an impact, either positive or negative, on the natural beauty and special qualities of the area.

SODC Local Plan Policy ENV1: Landscape and Countryside 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.

Our previous interpretation of landscape character and LVIA matters still applies.

The Chilterns Conservation Board would submit that a refusal of consent based on AONB matters is robust and justified by the landscape evidence and policy / legislative protections. The site's location within an area of future site selection is a broad and ill-defined concept and one that must carry very little weight when placed alongside the negative impacts upon the manifestly negative impacts upon the AONB.

The CCB is grateful for the opportunity to submit these comments. We would also ask that the North Wessex Downs AONB be consulted on this application. Many thanks.

Previous CCB Comments

Planning Application to allow the development of an offline River Thames marina basin with fixed and floating pontoon moorings for approximately 280 boats, slipway, secure and public car parking, refuelling and pump-out dock, refuse and recycling area, marina office and caf, toilet and shower block and laundry facilities, boat hire building, picnic and barbeque area, open water area, circular footpath, boat workshop, new footbridge and creation of new grazing marsh, grassland, pond, reedbed and wet woodland habitat with a construction phase involving the extraction and processing of sand and gravel, the importation of inert fill and the construction of new site accesses, landscaping and screening bunds.

Land at White Cross farm, Reading Road, Cholsey, Oxfordshire

OCC reference: MW.0033/18

CCB Objection

1st June 2018

Thank you for consulting the Chilterns Conservation Board (CCB). CCB raises objection on the grounds that this application harms the setting of the AONB by introducing a dramatic land-use change that is both discordant with the landscape character of the AONB boundary and involves much ephemeral buildings and development that detracts from the open and undeveloped countryside setting of the River Thames and Chilterns AONB. CCB asks that in considering the planning balance that the Waste and Minerals Authority give full weight to the landscape policies that protect the setting of the AONB, namely CSEN1 of the SODC Core Strategy and M4 (section g) of the Minerals and Waste Local Plan and L7 of the AONB Management Plan (setting of the AONB). We also ask that weight is attributed to the CCB Position Statement on Setting, as is appropriate. CCB notes that the application is for sand and gravel extraction with inert fill prior to the implementation of the marina. The planning statement makes the point (10.3.1) that the business model is based on the assumption that sand and gravel will be extracted. The planning authority should, in our judgment, determine this application on the merits of the proposed Marina. Whether or not this site is suitable for sand and gravel extraction should not be a relevant matter in the creation of a post-extraction marina because ordinarily restoration would involve a return to agricultural use.

We are aware that the North Wessex Downs AONB is also impacted and an assessment will also be required for this neighbouring AONB.

CCB raises objection on the following grounds:

1.0 Landscape Impacts

1.1. The application site adjoins and slightly overlaps (at its north-eastern boundary) the Chilterns AONB. The AONB boundary is defined by the Thames and a close landscape relationship is drawn within its setting. The original South Oxfordshire Landscape Study (by Atlantic Consultants) defines this as landscape within the River Thames corridor and

one attributed key characteristic (amongst many) is the 'intimate, pastoral and tranquil character with some 'arcadian' qualities along the Thames close to settlements and riverside parklands (eg. Mongewell)' The Planning and development issues as identified lead on the point that 'Large-scale development of any kind will be inappropriate within open countryside areas and along the river corridors. The ability of the landscape to accommodate small-scale development will depend upon: the potential impacts on distinctive landscape and settlement character and settlement character; the potential impacts on intrinsic landscape quality and valued features and the overall quality sensitivity of the landscape to change; the visual sensitivity of the receiving landscape. The landscape evidence base for the new local plan also includes the new SODC Landscape Character Assessment September 2017 (by Lepus Consultants) and the OWLS: Oxfordshire Wildlife & Landscape Study. Both documents reinforce the importance of landscape character and the need for appropriate development.

The consequential overlap between River Thames Corridor and the Central Vale Fringes (Character Area 6) follows the base of the Chiltern escarpment and form a transitional zone between the chalk uplands and the low-lying clay vale and River Thames floodplain. The AONB to the east of the current application site predominantly falls within Character Area 6 and there is a clear landscape relationship between the uplands - clay vale and River Thames floodplain. At the very junction of 4 and 6 in proximity of this application the combination of floodplain / parkland and amenity landscape creates a pastoral quality of considerable value and sensitivity. Users of the Thames Path and visitors to Mongewell Park appreciate this combination and inter-relationship between these landscape character areas. The applicant's Landscape and Visual Impact Assessment (LVIA) at its 6.1.12 accepts the high sensitivity for users of the Thames Path. Further, the applicant's own photomontages submitted as photo C (view adjacent to Thames Path) illustrates this relationship.

The submitted supporting planning statement does not address the AONB setting relationship in any great detail and the Environment Statement (at 11.3.1 and 11.4.1) concludes that with mitigation there will be no significant impact on landscape character. We assume that reference to the River Trent at 11.4.1 is in error. The LVIA does include consideration of the AONB Management Plan (at its 2.8.7) but when concluding on landscape sensitivity makes the point that (at 5.9.13 - Table 2) impacts on the Chilterns AONB 'will be of a low magnitude and with a slight adverse effect (and no lower than that)'. CCB do not accept this and the applicants' assessment gives insufficient attention to visual impacts and landscape character impacts - especially where the landscape character areas overlap and where they adjoin. The setting of the AONB is given insufficient attention or is glossed over. The magnitude of change is high and negatively so and the landscape and visual impacts must be assessed as medium at the very least. The setting of the Chilterns AONB

In our judgment the setting of the AONB is negatively affected. The relevance of this issue is supported by both Development Plan policy CSEN 1 and M4 (g) and in the AONB Management Plan at Policy L7: The quality of the setting of the AONB should be conserved by ensuring the impact of adjacent development is sympathetic to the character of the Chilterns and at Policy L5: Developments which detract from the Chilterns' special character should be resisted.

The CCB Position Statement is material (available at <http://www.chilternsaonb.org/conservation-board/planning-development/position-statements>) and states that (paragraph 14). 'The setting of the Chilterns AONB does not have a geographical border. The location, scale, materials or design of a proposed development or land management activity will determine whether it affects the natural beauty and special qualities of the AONB. A very large development may have an impact even if some considerable distance from the AONB boundary. However, the distance away from the AONB will be a material factor in forming a decision on any proposals, in that the further away a development is from the AONB boundary the more the impact is likely to be reduced'.

Paragraph 15 of the position statement gives examples and as (we have underlined issues of significant concern). Blocking or interference of views out of the AONB particularly from public viewpoints or rights of way; Blocking or interference of views of the AONB from public viewpoints or rights of way outside the AONB; Breaking the skyline, particularly when this is associated with developments that have a vertical emphasis and/or movement (viaducts, chimneys, plumes or rotors for example); The visual intrusion caused by the introduction of new transport corridors, in particular roads and railways; Loss of tranquillity through the introduction of lighting, noise, or traffic movement; Introduction of significant or abrupt changes to landscape character

particularly where they are originally of a similar character to the AONB; Change of use of land that is of sufficient scale to cause harm to landscape character; Loss of biodiversity, particularly in connection with those habitats or species of importance in the AONB; Loss of features of historic interest, particularly if these are contiguous with the AONB; Reduction in public access and detrimental impacts on the character and appearance of rural roads and lanes, and Increase in air or water pollution.

Development Plan Policy and legislation to protect the Chilterns AONB.

CCB asks that great weight is given to the Minerals and Waste Local Plan Policy (Sep 2017) M4 at criterion (g) 'avoidance of locations within or significantly affecting an Area of Outstanding Natural Beauty'. The areas of search set out in Policy M3 do not afford a blanket approach to the granting of extraction consents but instead frames a qualified criterion based methodology. Of course these policies apply to the extraction of minerals and in this case the post-development proposal is the most harmful element. This element of the application has to be determined against SODC, National and CCB policies. Restoration policies such as Policy M10 'Restoration of mineral workings' would not apply.

The proposal is contrary to:

The AONB Management Plan 2014-2019 at L5 and L7 (as above) - dealing with the Chiltern's special character and the setting of the AONB.

Section 85 (i) of the Countryside and Rights of Way (CROW) Act - 'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty' - This applies to the small section within the AONB.

Paragraph 115 of the National Planning Policy Framework (NPPF) - 'Great weight should be given to conserving 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 landscape and scenic beauty' - This applies to land within and outside, which exerts an impact on the special character and qualities of the AONB.

Policy CSEN 1 of the Local Plan (SODC Policy CSEN1 Landscape at (ii) - 'High priority will be given to conservation and enhancement of the Chilterns and North Wessex Downs Areas of Outstanding Natural Beauty (AONBs) and planning decisions will have regard to their setting. Proposals which support the economies and social well-being of the AONBs and their communities, including affordable housing schemes, will be encouraged provided they do not conflict with the aims of conservation and enhancement.'

We also would link the relationship between Local Plan policy C3 and R9 to the protection of the Chilterns. C3 requires that Policy C3 'The distinctive character of the River Thames and its valley and the settlements on its banks will be maintained and, where appropriate, enhanced. Proposals for any form of development which detracts from its special character will not be permitted and R9 at (i) where it states that 'In considering proposals for recreational development associated with the River Thames and its valley, the overriding aim will be to preserve the river environment and landscape. To this end: (i) new permanent moorings or new hire bases will not be permitted: temporary and overnight moorings for visitors will be permitted in suitable locations where no environmental damage is caused and where proper access and other facilities are available'.

Conclusions.

The assessment of this application in the LVIA fails to give appropriate weight to the setting of the AONB.

The Chilterns Conservation Board wishes to raise an objection to this application, which is harmful to the AONB and which significantly falls short of the policy and the legislative duties that attribute great weight and importance to the conservation of landscape and scenic beauty within and affecting an AONB. These duties are given a particularly enhanced status in the determination of planning applications. That status requires that planning applications result in the conservation and enhancement of the special qualities. In this case those special qualities are manifest in the landscape character setting and boundary configuration of the River Thames and the relationship between the Thames and Central Vale character areas. The development proposed here is major and of substantial magnitude involving a land-use change that is out of character and discordant and with a manifestation of inappropriate development covering a refuelling office, caf, toilets, 220 car parking spaces, 320 berths, security fencing and CCTV cameras. This application cannot possibly satisfy policy and would be significantly harmful to the enjoyment of the Chilterns, whether walking within it (especially in

Mongewell) or when walking the Thames Path and in the appreciation of its riparian AONB setting. The application papers generally conclude that this proposal has a benign effect on landscape character and visual impact. This cannot be correct and CCB raises objection that the marina proposal is harmful and contrary to policy.

The Chilterns Conservation Board recommends that planning permission is refused for reasons that this development is harmful to the setting of the AONB and significantly detracts from the special qualities of the AONB.

Yours sincerely

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Attachments