

White Cross Farm, Reading Road, Cholsey,  
Wallingford, Oxfordshire

**Proposed 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.**

APP/U3100/W/25/3361505

**Proof of Evidence**

**Oxfordshire County Council  
July 2025**

## **1.0 INTRODUCTION**

### **1.1 Personal Details and Qualifications**

1.1.1. My name is David Periam. I hold a Bachelor of Arts degree in Geography from the University of London, a Master of Sciences degree in Soil Science from Reading University and a diploma in Town and Country Planning from Oxford Polytechnic. I am a member of the Royal Town Planning Institute.

1.1.2. The evidence which I have prepared and provide for this appeal reference APP/U3100/W/25/3361505 in this proof of evidence, is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

1.1.3. I have been employed in the planning services of local government since February 1987 commencing at Salford City Council and subsequently Buckinghamshire County Council and Oxfordshire County Council. Since December 2023 I have been the Planning Development Manager for the County Council.

1.1.4. I am familiar with the application site and with other sites in Oxfordshire permitted and proposed for mineral extraction and waste management developments.

## **2.0 CONSIDERATION OF THE DEVELOPMENT WITH REGARD TO THE REASON FOR REFUSAL**

### **2.1 Adverse Landscape and Visual Impact**

- 2.1.1 A planning application for the proposed development (reference MW.0115/21) was submitted to Oxfordshire County Council in September 2021. The details of the development and its location are summarised in the agreed Statement of Common Ground. The application was refused by the council's Planning and Regulation Committee on 3<sup>rd</sup> September 2024 for one reason as set out in the agreed Statement of Common Ground.
- 2.1.2 This proof of evidence considers the appeal development in relation to relevant development plan, national planning and other material considerations with regard to the reason for refusal and the evidence provided in the proof of evidence of Graham Woodward, the council's expert witness on landscape and visual impact and in the appellant's Statement of Case.
- 2.1.3 The appeal site is located on agricultural fields adjacent to the River Thames and Thames Path National Trail and in the setting of the Chilterns National Landscape (CNL) to the east. The site is flat, low-lying land which lies largely within the flood plain of the River Thames. Despite the proximity of Nosworthy Way to the north and the traffic passing along it and the Reading Road to the west, the site is a markedly tranquil location where in my experience from having visited the site on several occasions since 2018, the main sounds heard are from users of the River Thames, grazing cattle and bird song.
- 2.1.4 Section 245 of the Levelling-up and Regeneration Act places on local authorities a duty to further the purpose of conserving and enhancing the natural beauty of Areas of Outstanding Natural Beauty (AONBs) (National Landscapes).
- 2.1.5 The development is contrary to development plan policies C8 of the Oxfordshire Minerals and Waste Local Plan – Part 1 Core Strategy 2017 (OMWCS) (CD12.01) and ENV1 of the South Oxfordshire Local Plan 2035 (SOLP) (CD12.03). Policy C8 seeks to enhance local landscape character, mitigate impact on the landscape and that where significant adverse impacts cannot be avoided or adequately mitigated, compensatory environmental enhancements be made to offset the residual

landscape and visual impacts. It states that great weight will be given to conserving the landscape and scenic beauty of AONBs and high priority will be given to the enhancement of their natural beauty. Proposals for minerals development 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.

- 2.1.6 Policy ENV1 seeks to protect the landscape and countryside from harmful development and that development protects and, where possible enhances, features that contribute to the nature and quality of landscapes, including user enjoyment of the River Thames, important views, and aesthetic features such as tranquillity. It states that the highest level of protection will be given to the AONBs and development 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.
- 2.1.7 These policies reflect paragraph 189 of the Framework which makes clear that the Government attaches great importance to National Landscapes and their settings. Development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.
- 2.1.8 The development is also contrary to draft policies NH4, NH6 and NH7 of the South Oxfordshire and Vale of White Horse District Council Joint Local Plan Pre-submission publication version (Regulation 19) October 2024 (JLP 2024) (CD13.01) which make similar provision. The hearing into this was due to commence on 3<sup>rd</sup> June 2025 and this document and its supporting policies are considered to carry some weight in decision making.
- 2.1.9 Some weight should also be attached as material considerations to the Chilterns AONB Management Plan (CMP) policy DP4 (CD12.05) and the Chilterns Conservation Board – Position Statement Development Affecting the Chilterns AONB (CD12.06). These set out that in the setting of the CNL, full account should be taken of whether proposals harm the CNL.
- 2.1.10 The appeal development would have a significant large adverse landscape and visual effect whilst operational for mineral extraction and processing, infilling and restoration and so would

impact on users of the River Thames, the Thames Path National Trail and its users and on the setting of the Chilterns National Landscape as detailed in Mr Woodward's evidence. This also renders the development at odds with CMP policy DP4 and contrary to the Position Statement Affecting the Chilterns AONB. There is therefore significant harm arising from the appeal proposal which is contrary to the development plan and other material considerations.

2.1.11 As also set out in Mr Woodward's evidence, this significant large adverse effect cannot be mitigated by the measures proposed by the appellant including the provision of a four metres high barrier of straw bales sited approximately 30 metres from the bank of the river which would itself be an unnatural, incongruous feature. The two metres high post and wire fence with two strands of barbed wire proposed to be sited between 15 metres from the river would also be unnatural and intrusive. Both of these proposed mitigation measures would contribute to the significant large adverse effect and so impact of the development as set out in Mr Woodward's evidence and so to the significant harm arising from the appeal proposal. The proposed planting whilst beneficial in the longer term, would not mature sufficiently during the operational period of the development to effectively screen the quarry whilst operational.

2.1.12 The appeal development would replace the existing agricultural meadows, which lie in the setting of the CNL, with an active quarry for several years whilst mineral extraction and processing, infilling and restoration was being carried out. Quarrying and mineral processing and subsequent infilling and restoration are inherently industrial in nature and disruptive developments including from the associated plant and machinery and heavy goods vehicle movements. As well as the identified significant large adverse landscape and visual effect and so impact on the River Thames and its users, the Thames Path National Trail and its users and the setting of the CNL, this would not work to conserve and enhance the natural beauty of the CNL.

2.1.13 Whilst the site would be restored to a mixture of agriculture and nature conservation, which Mr Woodward has identified as providing some beneficial improvement including biodiversity enhancements over a longer period of time, the site already serves these purposes as it exists albeit the habitats differ from

those proposed. There is though no inherent environmental issue with the site as it exists and so there is no overriding landscape, biodiversity or other environmental benefit arising from this development at this sensitive location which would outweigh the identified harm or further the purpose of conserving and enhancing the natural beauty of the CNL.

### **3.0 THE PLANNING BALANCE**

- 3.1.1 The significant benefit which has to be weighed in the planning balance which could outweigh the identified harm is the great weight to be given to the benefits of mineral extraction, including to the economy, in line with paragraph 224 of the Framework.
- 3.1.2 It is not disputed that there are economic developments at both the local and national scale associated with the proposed development. It would create local jobs both directly and indirectly and be both a customer and supplier to local businesses. Business rates would be payable as would the aggregates levy and other national taxes. This would be true of any such proposal for the extraction of mineral and subsequent infill with inert material.
- 3.1.3 There is development identified in the SOLP and JLP 2024 which requires aggregate mineral to be provided for its construction and a further local source of sand and gravel would have potential sustainability benefits including through reduced travel distances from the source of the mineral to where it would be used and providing a site for locally produced inert fill material as part of the site's restoration.
- 3.1.4 It is not disputed that the council has a duty to deliver sufficient planning permissions to maintain the landbank for sand and gravel over the OMWCS period and beyond.
- 3.1.5 As of the end of 2023, Oxfordshire held an estimated 7.693 million tonnes (mt) of sand and gravel reserves, equating to a landbank of approximately 7.8 years based on the 2023 Local Aggregate Assessment (LAA) Annual Provision Rate (APR) of 0.986mt per year. The next formal update, expected in late 2025, will reflect 2024 sales and reserve data. National policy requires a minimum seven-year landbank, which, based on the 2023 LAA, equates to 6.902 mt. While the updated figures are

pending, a provisional assessment—factoring in end-2023 reserves, new permissions since then, and applying the 2023 APR as a proxy for 2024 and early 2025 sales—suggests current reserves could be around 6.296 mt. This falls short of the required threshold of 6.902mt, indicating Oxfordshire may not be currently meeting its minimum landbank requirement. This calculation is set out in the table below.

	<b>Million Tonnes</b>	<b>Cumulative Total</b>
Reserve at end of 2023	7.693	7.693
New Sand and Gravel Permissions 1 <sup>st</sup> Jan 2024 and 31 <sup>st</sup> May 2025	0	7.693
APR Rate applied as sales for 2024	0.986	6.707
APR Rate applied as sales between Jan-May 2025	$(0.986/12) \times 5 = 0.411$	6.296
<b>Estimated reserve at the 31<sup>st</sup> May 2025</b>		<b>6.296</b>

3.1.6 It is not therefore disputed that the consented mineral reserves do not provide the seven years landbank for sand and gravel. There is a need for further permissions to be granted which the grant of permission to the appeal development would contribute to.

3.1.7 As set out in the council's Statement of Case, there are outstanding planning applications before the council which, if consented, would increase the landbank but it is accepted that no assumptions can be made with regard to their approval at this time. Nonetheless, the identified significant large adverse landscape and visual effect and so impact, as set out in Mr Woodward's evidence and discussed above, would constitute a significant harm that would be caused through the grant of planning permission and its implementation at this sensitive location. This is not considered to be outweighed by the benefits arising from the grant of planning permission to the appeal development. The appeal development would provide 550,000 tonnes of sand and gravel, but this is a relatively small addition to the landbank of sand and gravel; it is approximately 56% of the aggregates provision rate of 986,000 tonnes per annum identified in the Local Aggregates Assessment 2023 (CD12.08). Whilst it is not denied that this would improve the landbank, the relatively limited additional mineral reserves that would be

contributed through the grant of planning permission would not outweigh the significant harms, in my view.

- 3.1.8 In addition, in its Statement of Case, the appellant has argued that the council's Landscape Advisor had no regard to the fact that the OMWCS had already assessed and weighed merits of locations, including proximity to the CNL and the Thames Path National Trail.
- 3.1.9 The appeal site does lie in an identified Strategic Resource Area (SRA) in the OMWCS (CD12.01). OMWCS policy M3 is clear that the principal locations for aggregate minerals extraction will be in the SRAs but goes on to state that specific sites for working aggregate minerals within the SRAs will be allocated in the Minerals & Waste Local Plan: Part 2 – Site Allocations Document, in accordance with policy M4. OMWCS policy M5 states that 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. OMWCS policy C4 states that proposals for minerals and waste development should ensure that the River Thames and other watercourses and canals of significant landscape, nature conservation, or amenity value are adequately protected from unacceptable adverse impacts. OMWCS policy C8 seeks to protect the landscape and scenic beauty of AONBs. OMWCS policy C11 states that the integrity and amenity value of the rights of way network shall be maintained.
- 3.1.10 It is not therefore the case that the OMWCS has identified the appeal site as suitable for mineral extraction, rather that it sits within an SRA and any proposal is then subject to the assessment against the criteria set out in the OMWCS as provided for under policy M5. This the council did in its determination of the application and concluded that the proposed development is not acceptable at the appeal site.
- 3.1.11 In conclusion, it can be seen that the proposals are contrary to the development plan, national planning policy and other material considerations. The need for additional sand and gravel



reserves to be consented and the other economic and sustainability benefits are not considered to outweigh the significant harm arising from the appeal proposal through the significant large adverse landscape and visual effect and so impact identified.

## **4.0 CONCLUSION**

4.1 Section 245 of the Levelling-up and Regeneration Act places on local authorities a duty to further the purpose of conserving and enhancing the natural beauty of Areas of Outstanding Natural Beauty (AONBs) (National Landscapes).

4.2 Paragraph 189 of the Framework makes clear that the Government attaches great importance to National Landscapes and their settings. It states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Landscapes which have the highest status of protection in relation to these issues. The scale and extent of development within such 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.

4.3 Paragraph 224 of the Framework sets out that great weight should be given to the benefits of mineral extraction, including to the economy.

4.4 There is an identified need for further planning permissions to be granted for the extraction of sand in gravel in Oxfordshire which is not disputed. The need for the mineral and any benefit arising has to be weighed in the planning balance against the harm arising from the appeal proposal. In this instance the significant harm caused by the large adverse landscape and visual effect and so impact on the River Thames and its users, the Thames Path National Trail and its users and the setting of the Chilterns National Landscape, as clearly identified in Mr Woodward's proof of evidence, is not outweighed by the benefits of mineral extraction, including to the economy. The need for additional mineral reserves to increase the county's sand and gravel landbank should instead be met at suitable sites where such development is concluded not to cause such significant harm or conflict with other relevant policies.

4.5 The appeal proposal would cause significant harm in conflict with the development plan and other material considerations and adequate justification for this has not been put forward in support of the appeal proposal. The application must be determined in accordance with the

development plan and other material considerations and the refusal of the planning application was consistent with this.