

**JOINT SUBMISSION**

**BY CHOLSEY PARISH COUNCIL AND WALLINGFORD TOWN  
COUNCIL**

**Joint consultation response to planning application  
MW.0033/18 for sand and gravel extraction at  
White Cross Farm  
Cholsey, nr Wallingford**

**July 2018**

Wallingford Town Council Offices  
9 St Martin's Street  
Wallingford  
Oxfordshire OX10 0AL

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## **1. Introduction**

This is a joint response by Cholsey Parish Council and Wallingford Town Council (“Cholsey and Wallingford”) to the planning application for sand and gravel extraction at White Cross Farm, located just south of the Wallingford town boundary in the parish of Cholsey .

In preparing this response, Cholsey and Wallingford have considered the updated and additional documents submitted in July 2018.

We object to this development on the grounds that the wide range of negative impacts arising from the proposed extraction and the restoration to a marina are not outweighed by its benefits and therefore the development is unacceptable. Our detailed objections are set out below in the main body of this response.

If, notwithstanding our objections and those of others (including South Oxfordshire District Council), the Minerals Planning Authority is minded to grant permission, we urge it to impose conditions to ensure that the planned restoration to a marina is fully funded before the commencement of extraction. Our reasoning is set out below in the main body of this response.

## **2. Impact on Ecology**

The environmental statement (“ES”) and the ecological impact assessment (“EIA”) for this proposal are deficient and misleading with regards to the cumulative impact on ecology:

- Whilst the ES contains a chapter (17) on Cumulative and Combined Impacts, the EIA does not.
- Both documents are silent on the combined effects of the development on the Wallingford to Goring Conservation Target Area (“CTA”);
  - Impacts on individual species are assessed, but there is no assessment of the effect on the ecosystem as a whole.
  - In particular, the assessment does not address the fact that the development will truncate the CTA and isolate the northern part (north of Nosworthy Way) from the remainder of the CTA.

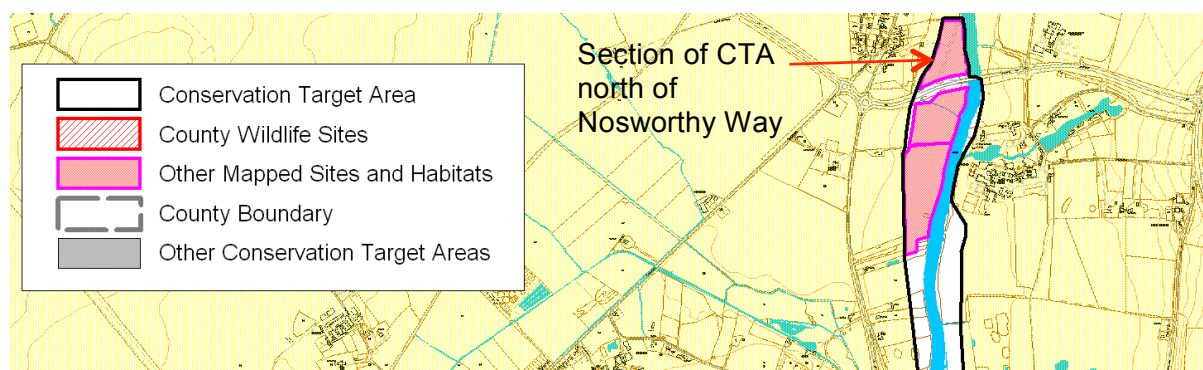


Figure 1 Northern Section of CTA

This is contrary to

- NPPF 109 (the requirement to establish coherent ecological networks)
  - NPPF 17 (requirement to conserve and enhance the natural environment).
  - OCC Minerals and Waste Core Strategy policy C5 (proposals should demonstrate that they will not have an unacceptable adverse impact on the local environment)
  - OCC Minerals and Waste Core Strategy policy C7 (Minerals development should conserve and where possible deliver a net gain in biodiversity,
    - Development that would result in significant harm will not be permitted,
    - Development that would result in the loss or deterioration of irreplaceable habitats, including ancient woodland and aged or veteran trees, will not be permitted except where the need for and benefits of the development in that location clearly outweigh the loss.
    - Development shall ensure that no significant harm would be caused to:
      - Local Nature Reserves;
      - Local Wildlife Sites;
      - Sites of Local Importance for Nature Conservation;
      - Protected, priority or notable species and habitats,
- except where the need for and benefits of the development in that location clearly outweigh the harm.

- All proposals for mineral working and landfill shall demonstrate how the development will make an appropriate contribution to the maintenance and enhancement of local habitats, biodiversity or geodiversity (including fossil remains and trace fossils), including contributing to the objectives of the Conservation Target Areas wherever possible.
- OCC M&W policy M10 restoration (requirement to restore to a high standard, taking into account the characteristics of the site prior to mineral working, opportunities to enhance green infrastructure and provide local amenity uses, the conservation and enhancement of biodiversity appropriate to the local area, supporting the establishment of a coherent and resilient ecological network through the landscape-scale creation of priority habitat).
- SODC policy CSB1 (the requirement to avoid a net loss of biodiversity), SODC policy C6 (biodiversity maintenance and enhancement) and
- Policy C9 (which protects the loss of landscape features where they make an important contribution to the local scene and/or provide an important habitat).

This development would reduce the viability of the isolated section of the CTA, and therefore further reduce the viability of the CTA as a whole. The impact of the development on the CTA will therefore be much larger than the applicant has claimed (or has assessed). It is unscientific to simply assume that flora and fauna will be able to migrate between the truncated northern section and the remainder of the CTA around the periphery of the workings/marina. This is particularly the case when it is considered that the 30 metre strip along the bank of the River Thames, which should be the primary corridor, will itself be cut by the marina entrance and will be subject to heavy human disturbance from users of the Thames Path (including anglers). At present, disturbance by users of the Thames Path is mitigated by the fact that the rest of the site is relatively undisturbed and there are ample alternative corridors. Again, this is in conflict with NPPF 109, NPPF 17, OCC M&W C5, OCC M&W C7, OCC M&W M10, SODC CSB1, C6 and C9.

- The EIA (Para 5.15) merely notes that the development will result in a loss of “ of 6.89ha of semi-improved grassland, 6.46ha of arable, 3.65ha of marshy grassland, 303m of defunct hedgerow, 519m of wet ditch, 0.40ha of scrub, one individual tree, 0.14ha of tall herb/ruderal”. It fails to mention that within the whole CTA, Biodiversity

Action Plan Coastal and Floodplain Grazing Marsh habitat amounts to just 34.5ha<sup>1</sup>. This proposal will, if approved, amount to the loss of 10.6% of this priority habitat. When considering the isolation of the truncated northern section of the CTA, which is almost entirely marshy grassland, an additional 3.1 ha of the marshy grassland in the CTA will be negatively affected by this proposal. This means that in total 6.75 ha, or 19.6% of this priority habitat within the CTA will be negatively impacted. Neither the EIA or the Wintering Birds Survey (“WBS”) take this into account, indeed the WBS actually states

*“The area of floodplain grazing marsh which is UK BAP priority habitat provides high quality habitat for a variety of ‘notable’ and common and opportunistic species. However with the implementation of the above recommendations, it is considered that the long term avian biodiversity have a minor negative impact on the avian diversity within the site. “*

Cholsey and Wallingford are of the opinion that as nearly 20% of the BAP priority habitat in the CTA will be affected it can only be considered a major negative impact and contrary to NPPF 109, NPPF 17, OCC M&W C5, OCC M&W C7, OCC M&W M10, SODC C6, C9 and CSB1.

- In considering the impact on birds, the EIA and ES do not examine the impact of the proposal on non-breeding species. Whilst the WBS mentions Kingfishers, it dismisses any impact with the statement *“Kingfisher was observed commuting along the River Thames during one survey, it is considered unlikely that this species is foraging or sheltering within the site.”* There is no mention whatsoever of herons. Residents of Cholsey and Wallingford can attest that both Herons and Kingfishers are frequent visitors to the application site and the eastern bank of the Thames opposite the site, and contribute greatly to their appreciation of this site for recreation.
- The ES (Chapter 13, RAF Benson Safeguarding) refers to the Bird Management Plan which it considers will prevent significant impact on operations on RAF Benson. However, neither it nor the EIA nor the WBS consider the impacts of the Bird Management Plan on the birds, or indeed other fauna, that currently use the site. 4.3.7 of the Bird Management Plan states:

*Where necessary mitigation measures may include the following:*

- *Visual repellents e.g. Flags, red tape, reflectors*

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<sup>1</sup> Thames Wallingford to Goring CTA definition paper, Oxfordshire County Council (attached to this representation)

- *Bird scaring measures e.g. manual dispersal methods or distress calls*
- *Population control (taking into account relevant legislation and licenses)*
- *Habitat review and change. This is a last resort should all other mitigation methods fail.*

The bird management measures will deter not only large water fowl, but the smaller species already present on the site. The measures are therefore likely to have a negative impact on all birds on the site and lead to a net loss in biodiversity. Their application is therefore contrary to NPPF 109, NPPF 17, OCC M&W C7, OCC M&W M10, SODC C6 and CSB1.

- The EIA, WBS, and the EA disingenuously fail to mention the Cholsey Marsh Nature Reserve run by Berks, Bucks & Oxon Wildlife Trust<sup>2</sup>. Instead they simply rely on the fact that it is included within the CTA. The reserve is home to many species, including the nationally rare Desmoulin's whorl snail and the Loddon lily, as well as many species of birds. The EIA, WBS and EA are silent on the impact of the development on the reserve, and the species within it that use the application site for foraging.
- The EIA does not examine the impact on flora on the application site, including orchids and the Loddon Lily.
- The EIA and the Hydrological Impact Assessment do not assess the impact of the marina on fish. Examination of the borehole data indicates that considerable areas of the marina will have depths of less than 4 m in summer, when temperatures are highest and oxygen levels lowest. 4 m is the minimum depth required to ensure that there is oxygenated water at depth within bodies of water that are not free flowing, as will be the case with this marina. The narrowness of the entrance means that fish from the River Thames will be able to enter the marina but it will be difficult for them to escape. Low oxygen levels in the marina in summer means that fish mortality rates will increase, negatively impacting on fish populations in the Thames. Once again, this will result in a net loss of biodiversity.
- Cholsey and Wallingford contend, for the reasons above, that this application is contrary to NPPF 109 (the requirement to minimise the impact on biodiversity and provide net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures),

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<sup>2</sup> <http://www.bbwt.org.uk/reserves/cholsey-marsh>

NPPF 17 (requirement to conserve and enhance the natural environment), OCC M&W C5 (unacceptable adverse effect on the local environment), OCC M&W C7 (loss of irreplaceable habitats failure to maintain and enhance biodiversity, impact on the CTA), OCC M&W M10, SODC policy CSB1 (requirement to avoid a net loss to biodiversity), SODC policy C6 (maintenance of biodiversity) and SODC C9 (loss of habitat).

### **3. Impact on People**

If permitted, this development will have a highly negative net impact on people. There will be two key impacts, on persons using the Thames Path and on rowers

- The first key negative impact will be the loss of a valued landscape that is used extensively used not just by the people of Cholsey and Wallingford, but by national and international visitors walking the Thames path. If this application is granted, this valued landscape will be transformed from one with the character of riparian grazing and marsh habitat to that of an open water marina. The motorised boats using it will produce noise and fumes and destroy the tranquillity of this section of the Thames Path. This application is therefore contrary to
  - NPPF 17 (requirement to prefer land of lesser environmental value)
  - NPPF 74 (requirement that existing open space should not be built on unless the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location).
  - NPPF 109 (the requirement to protect and enhance valued landscapes).
  - NPPF116 (the requirement to refuse planning permissions (except in exceptional circumstances in the public interest) where there is a detrimental effect on the environment, the landscape and recreational opportunities).
  - NPPF 123 (the requirement to protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason).
  - NPPF 144 (requirement for there to be 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).



- OCC M&W C8 Landscape (requirement to respect and where possible enhance local landscape character)
- OCC M&W M10 (restoration to take into account the characteristics of the site prior to mineral working, the character of the surrounding landscape, the amenity of local communities conserve and enhance of biodiversity)
- SODC Policy CSEN1 (the requirement to protect the District's distinct landscape character and the requirement to maintain and enhance the landscapes and waterscapes of the River Thames corridor, as will the setting and heritage of the river for its overall amenity and recreation use).
- SODC Policy G2 (protection of the countryside, settlements and environmental resources from adverse developments)
- SODC 4 Policy G4 (protection of the countryside for its own sake as an important consideration when assessing proposals for development).
- SODC Policy C3 (maintenance of the distinctive character of the River Thames and its valley - proposals for any form of development that detracts from its special character will not be permitted)
- SODC policy R7 (only small scale facilities for recreational use, no overriding amenity or environmental or traffic objections).
- SODC policy R9 (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).
- SODC Policy TSM1 (Tourism proposals will only be supported if they are based on the conservation and enjoyment of the inherent qualities and heritage of the area)

In National terms, the applicant has remained silent on the exact use of the Thames Path National Trail. The current estimates, based on the Orval Modeling system, are that across its 184 mile length, the trail received over 22.5 million visits per year, with an estimated welfare value of just over £92 million per year<sup>3</sup>. Cholsey and Wallingford obviously recognise that not all visitors to the trail visit the section covered by the application site and that some sections are more heavily used than others. However, if one divides the total number of visitors by 296 (the length of the trail in kilometres)

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<sup>3</sup> Personal communication from the manager of Thames National Path Trail

one arrives at the figure of an average of 86,000 visitors per kilometre per year, or 236 visitors per km per day. Cholsey and Wallingford consider that this is representative of the usage of our section of the trail. The Welfare value of this usage is equivalent to £347,000 per year, a little under £1,000 per day.

The applicant has failed to take into account the cumulative effect that this development will have on the recreation of the residents of Cholsey and Wallingford: this landscape has become even more valued since the planning approvals for:

- MW.0094/16 (New Barn Farm);
- APP/Q3115/W/15/3032691 (Site E part, for development of 85 dwellings in Winterbrook);
- P16/S4275/O (Site E remainder, for the development of 502 dwellings in Winterbrook); and
- P14/S2860/O (Site B, 555 houses in the north-west of Wallingford)

were granted. The location of these consents is shown in Appendix 1.

Together, these aforementioned developments change the nature of most of the footpaths in Wallingford and the northern part of Cholsey from rural footpaths to footpaths in a built or industrial setting. In particular, MW.0094/16 and P16/S4275/O together completely change the Agatha Christie Trail to the point that the trail would be unrecognizable to Dame Agatha. Once all these planning permissions are completed, the Thames Path from Wallingford to the Four Arches Bridge (aka Moulsoford Railway Bridge) will effectively be the last (and longest) unbroken rural pathway available to residents with unrestricted views, to serve a population which is set to increase by 38% in the next 7 years. In its EA, the developer has completely failed to assess the cumulative impact of this development on recreational walking in our two parishes.

- The second key impact will be a significant (national) negative impact on rowing. Wallingford Rowing Club has produced a number of Olympic medallists, a fact of which the people of Wallingford are proud. The stretch between Wallingford and Goring is the longest unbroken stretch of the River Thames upstream from Teddington, making it ideal for training rowing crews. There is a similar length reach at Radley, but this is more congested as a result of the marina developments in Abingdon. Both Oxford University and Oxford Brookes have boathouses here to train the crews that compete in the Boat Race, and in national and international competitions. As such, rowing has become a recognised and valued part of our way of

life. When the Inspector heard the appeal for the current university boat house, he stated that *“The University Boat Race is an event of national importance, which provides a showcase for rowing”*. He went on to say *“It seems to me beyond question that the participants need proper training facilities”*. At present, upwards of 200 rowers can be using the stretch of the River in which the application site is located. The EA is silent on how many boat movements there would be in and out of the marina. However, the Transport Assessment (5.3.3) states that on Sunday (a peak day for rowing) there will be approximately 109 vehicles per hour. Even if just half of these vehicle movements are associated with boat movements, this will still equate to circa 54 boat movements per hour, or a little under one per minute, which will interfere with training. Should this application be allowed, it will greatly increase congestion on this stretch of the Thames and compromise the ability of crews to train. The location of the entrance to the marina at a point where the river is just 40m wide will compromise the safety of the crews. This would be a negative impact at a national scale given the Inspector’s comments and the fact that rowing is one of our most successful Olympic sports. In policy terms, this is contrary to

- NPPF 74 (requirement that existing open space should not be built on unless the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location – clearly the Wallingford to Goring reach of the Thames cannot be replaced)
- NPPF116 (the requirement to refuse planning permissions (except in exceptional circumstances in the public interest) where there is a detrimental effect on the environment, the landscape and recreational opportunities).
- OCC M&W C5 (affect on the local environment, human health and safety (rowers), and amenity from noise and visual intrusion).
- OCC M&W M10 (amenity of local communities)
- Policy CSEN1 (the requirement to protect the District’s distinct landscape character and the requirement to maintain and enhance the landscapes and waterscapes of the River Thames corridor, as will the setting and heritage of the river for its overall amenity and recreation use).
- SODC Policy G2 (protection of the countryside, settlements and environmental resources from adverse developments)

- SODC Policy C3 (maintenance of the distinctive character of the River Thames and its valley - proposals for any form of development that detracts from its special character will not be permitted)
  - SODC policy R7 (only small scale facilities for recreational use, no overriding amenity or environmental or traffic objections).
  - SODC Policy R9 (preservation of the river environment and landscape, prohibition of new permanent moorings or new hire bases will not be permitted, water-sports activities should develop through existing sites and premises rather than through the creation of new ones, planning permission new facilities for water-sports only where it can be satisfactorily demonstrated that there would not, as a result of the development, be insuperable conflicts between river users, or significantly increased congestion).
- There will be an negative impact on anglers through the negative impact on fish populations.

#### **4. RAF Benson Safeguarding**

OCC M&W policy M10 requires bird strike risk and aviation safety to be taken into account when considering minerals restoration plans. Cholsey and Wallingford are greatly concerned that in operation, the bird control measures will be ineffective in preventing a bird strike hazard to aircraft from RAF Benson. It is difficult to see how any planning conditions for the control of birds can be enforced, particularly if the marina is not profitable and the owners are incentivised to cut staff in winter when there is little usage of the marina. OCC as the MPA is under enormous budgetary pressures and it will not be able to devote the staff necessary to monitor the adherence or otherwise to the bird control measures.

Residents of our two parishes are rightly proud of RAF Benson and its service men and women. Should the bird control measures not be applied, or prove ineffective, this has the potential to endanger the lives of the air-crew. In our opinion this vastly outweighs any benefits that the development may bring. In our opinion this is a prime case where the precautionary principle should be applied, and the development refused.

If OCC is minded to grant this application despite our objections, we urge OCC to impose a condition for the establishment of a fund of sufficient size (such that no costs will fall on the public purse) that it will enable OCC (or its successors) to appoint a contractor to operate the bird management plan in perpetuity, independently of the operator of the marina. This fund should be agreed and fully funded prior to the commencement of development.

## 5. Impact on Air Quality and Noise.

- The EIA and the Air Quality Assessment (“AQA”) do not assess the impact of this development on NO<sub>2</sub> levels in the area. It does not assess the impact of emissions from the site (extraction vehicles and, once the marina is built, boats and the vehicles coming to the site) on the Air Quality Management Area in Wallingford, which is downwind of the development according to the AQA. It does not assess the impact from vehicles, particularly HGVs on the Air Quality monitoring point (a diffusion tube) at Portway (Newham Manor Farm, A4074<sup>4</sup>). This monitoring point showed an annual mean of 39.8 µg/m<sup>3</sup> NO<sub>2</sub> in 2016, just 0.2 below the legal limit. As a minimum, the cumulative impact (taking into account Site E and New Barn Farm as well as increasing traffic from elsewhere in South Oxfordshire) on NO<sub>2</sub> levels should have been assessed. This application is therefore contrary to
  - NPPF 120 (requirement to consider cumulative effects of pollution).
  - NPPF 124, (which requires that planning decisions should ensure that any new development is consistent with the local air quality action plan).
  - OCC M&W C5 (requirement to demonstrate no unacceptable adverse impact on air quality).
  - SODC policy EP1(prevention of polluting emissions).
- Cholsey and Wallingford note that the majority of boats using the marina would be powered by diesel engines, which have a greater impact than petrol engines. We note further that, if permitted, a significant proportion of the boats using it will head upstream towards Oxford. As the River Thames runs through the heart of Oxford, the increased traffic on the river that will result from the development will have an impact on air quality in the city. The EIA and the AQA are silent on the impact that this development would have on air quality in Oxford, which intends to ban all light non-zero emission vehicles in the city centre by 2020, and all non-zero emission vehicles by 2035. This application is therefore in conflict with NPPF 120, NPPF 124, OCC M&W C5 and Oxford City Council’s policy CP23.
- As proposed, the application fails to meet OCC Minerals and Waste Core Strategy policy C2: *“Proposals for minerals or waste development, including restoration proposals, should take account of climate change for the lifetime of the development from construction through operation and decommissioning. Applications for*

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<sup>4</sup> [https://oxfordshire.air-quality.info/diffusion\\_tube/141](https://oxfordshire.air-quality.info/diffusion_tube/141)

*development should adopt a low carbon approach and measures should be considered to minimise greenhouse gas emissions and provide flexibility for future adaptation to the impacts of climate change*” This development, if permitted, will generate CO<sub>2</sub> long after extraction has ceased (from vehicles accessing the site and from motorised boats) for no significant economic purpose. Contrast this with the current use of the site by walkers, rowers and anglers, who generate no CO<sub>2</sub> except what they breathe out. It is therefore also in conflict with NPPF 95 (plan for new developments in locations and ways that reduce greenhouse gas emissions).

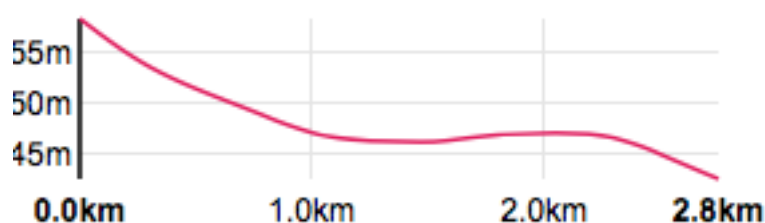
- The AQA has completely failed to assess the impact of dust and noise on the 70 bed care home at the end of Reading Road, Wallingford (P17/S3564/FUL). The meteorological data used in the AQA shows that the care home will be down-wind from the dominant wind direction, meaning that the effects should have been examined carefully. The care home will be just 200m from the minerals processing plant and the mineral stock pile, which means that it will be an Intermediate receptor. However, given the elderly and infirm nature of the occupants, it should be classified as a sensitive receptor. Dust at the care home will in addition include dust from the site roads leading to the processing plant and vehicles tipping at it will also blow towards the care home. The AQA shows (para 4.6) that there will be 57 dry days (less than 0.2mm precipitation) per year when the wind is blowing in the direction of the care home, and 38 dry days when the wind speed will be at or exceed 5.6m/s and will be able to carry dust. The AQA shows that on these days particles between 10 and 30µm from the site will reach the care home. The application therefore is in conflict with OCC M&W C5 (requirement to demonstrate that minerals development will not have an unacceptable adverse effect on human health and safety, residential amenity and other sensitive receptors through noise, dust and air quality).
- If, despite our objections, the MPA decides to grant this application permission, we request that it be conditioned to include:
  - Mandatory meteorological recording on site during the extraction period (reason, to check wind speed and direction at all times);
  - Cessation of working when the wind speed reaches or exceeds 5.6 m/s and the direction is towards Elizabeth House or the care home (reason to protect children and the infirm elderly from the effects of dust);

- A mandatory log book for recording all complaints about dust and noise, to be available for inspection at all times by the MPA, the District Council's Environmental Health team and relevant health agencies.

## 6. Visual Impact

In addition to the extensive comments that have been made on the visual impact of this development on people (in 3 above) concerning the loss of a valued landscape, Cholsey and Wallingford would like to point out that:

- This development would have an adverse impact on the setting of the Chiltern and North Wessex Downs AONBs and detract from them. It will also damage the setting of Cholsey and Wallingford and their relationship to the AONBs. This is contrary to NPPF 115, OCC M&W M4, SODC C4 and SODC CSEN1.
- The minerals processing plant and the marina buildings will be industrial/semi-industrial edifices located in what is currently open countryside. They will be visible from the Wallingford bypass, the Thames Path and PROWs further away (such as Cholsey Hill, contrary to the conclusions of the LVIA). This conflicts with SODC policies D1, G4.



Lowest 42.60m Highest 58.20m  
Total ascent 0.90m

Figure 2: Section from Cholsey Hill through New Barn Farm and the application site to the River Thames, illustrating that both developments and their associated plant and buildings will be visible

- The lighting proposed for the marina will negatively change the nature of the site, the River Thames National Trail, the listed buildings just across the river at Cartmel College and the AONBs. This is contrary to SODC policies C3, EP3.

## 7. Traffic

The ES (8.2.4) shows average daily movements on the Reading Road and on Nosworthy way. It does not show the average peak hour traffic, nor does it show the cumulative impact taking into account Sites B & E, or impact on the 70 bed care home. This is clearly a significant omission as it results in a false presentation of the impact of the proposal on traffic. Government guidance<sup>5</sup> makes it clear that:

*Each application (or request for a screening opinion) should be considered on its own merits. There are occasions where other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development. There could also be circumstances where 2 or more applications for development should be considered together. For example, where the applications in question are not directly in competition with one another, so that both or all of them might be approved, and where the overall combined environmental impact of the proposals might be greater or have different effects than the sum of their separate parts.*

And, in terms of NPPF 36,

*“Local planning authorities must make a judgement as to whether a proposed development would generate significant amounts of movement on a case by case basis (i.e. significance may be a lower threshold where road capacity is already stretched....)”.*

In its commentary on the planning application for Site B (P14/S2860/O-3), OCCs Highways stated:

*“The County previously made comment on this full application in a consultee response dated 2nd October 2015, and whilst in the main found the proposals within the submission acceptable, raised objection to the issue of additional intensification of roundabout junctions on the A4130 Wallingford ring road with geometry mitigation being offered. It was found, and acknowledged, that the Portway<sup>6</sup> and Crowmarsh Roundabouts and to a lesser extent the Winterbrook Roundabout, are presently at capacity, with RFC<sup>7</sup>s on some arms at or above 0.85. In the horizon year of 2024,*

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<sup>5</sup> <https://www.gov.uk/guidance/environmental-impact-assessment> and <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements#transport-assessments-and-statements>

<sup>6</sup> Referred to in the Transport Statement as the “Mongewell Roundabout”

<sup>7</sup> Required Flow Capacity



*baseline flows even without development, were predicted to rise further, with 1.0 RFCs and above on some arms.”*

As:

- both Site B and Site E are now consented, bringing a further 2,500 resident who will use the Wallingford bypass, and
- the entrance to Site E is on the Winterbrook roundabout is now at capacity (the same roundabout that this development would use if consented),

Cholsey and Wallingford object to this application on the grounds that traffic impacts have not been properly assessed.

## **8. Impact on and the Economy and Tourism**

Cholsey and Wallingford consider that this development would have a net negative impact on the economy and tourism.

- As shown in 3 above, the welfare value alone of the Thames Path across the application site is £347,000. This does not include the economic value that visitors to the trail bring to our two parishes. The welfare and economic value are both likely to diminish if this application is approved, but this has not been quantified in the ES.
- We note that a marina is a place where boats are moored by their owners. When they wish to use them, most owners arrive by car with their provisions, load them onto the boat, and head up or down river. The vast majority will not use the retail offerings of Cholsey and Wallingford to purchase their groceries. If they do stop to visit a pub or a restaurant, it is unlikely to be in Cholsey or Wallingford but somewhere else on the river. Thus our parishes will see little or no increase in trade from this Marina. Indeed, the fact that the developer wishes to include a café on site means that it may even detract from our existing offerings. This will be contrary to SODC Policy CST1 (support and strengthen town and village centres) and CSWAL1 (strengthen Wallingford town centre).
- RAF Benson and its staff make a significant contribution to the economy, not just in our two parishes but across the district. Cholsey and Wallingford are concerned that the potential for air strike arising from the application will not just affect the safety of aircrew but also the station's longer term operational viability. The economic impact of this will far outweigh any economic benefit from the marina.

- There will be just 10 jobs created during extraction, and “some 8” when the marina is in operation (applicant’s planning statement paras 8.8 and 4.91). We do not consider that this is a significant benefit when contrasted with the over 6,200 jobs already here at our two parishes<sup>8</sup>, and certainly not enough of a benefit to justify the significant harm that this development will cause to local residents and visitors through the loss of a valued landscape.

## **9. Financial Provision for Restoration.**

Cholsey and Wallingford have amply detailed our objections to this proposed development. However, we are concerned that if this site is given planning permission the restoration to a marina may never happen. There is a risk that once the gravel is extracted, there will be no funds available to restore the site, whether to a marina or some other use. Indeed, in recent years we have seen tens of millions of pounds of restoration cost fall on the public purse, particularly in Scotland, where minerals planning authorities had relied on ultimately worthless parent company guarantees and other financial provisions for the restoration of mineral workings that went bankrupt<sup>9</sup>.

This has resulted in the Scottish Government introducing new measure to ensure that minerals extraction restoration liabilities are funded. Interestingly, it has also examined how the restoration and aftercare liabilities of unconventional oil and gas wells should be funded, if the Scottish Government decides to permit them<sup>10</sup>. This relevant to this planning application as, like unconventional oil and gas wells, restoration and after care of this site can only begin after extraction has ceased and operational revenues have come to an end. This research paper concluded that parent company guarantees should only be accepted for minerals restoration liabilities if the parent company could pass stringent financial tests that are re-run every year. If the tests can’t be passed, additional provisions can be compelled by the authorities such as the use of irrevocable letters of credit and pre-funded escrow accounts.

Given that OCC is under severe budgetary pressure, it cannot afford to take any risk that restoration costs of this site could fall upon it. OCC M&W policy M10 gives OCC the right to ensure that the means (funding) of securing restoration is in place before planning permission is given. Cholsey and Wallingford therefore urge OCC, should it be minded to

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<sup>8</sup> Wallingford Neighborhood Plan Baseline Document, derived from SODC and Government data)

<sup>9</sup> Scottish Government, 2015c; Mackinnon, et al., 2014

<sup>10</sup> Unconventional Oil and Gas: Decommissioning, Site Restoration and Aftercare - Obligations and Treatment of Financial Liabilities, <http://www.gov.scot/Publications/2016/11/2034/0>

grant consent, to ensure that robust financial provisions, such as an escrow account, are made a condition of the planning consent with no work permitted to start before the account is funded. This will require an independent assessment of the restoration costs before the application is heard, to ensure that the quantum of the account is adequate.

## **10. Conclusion**

This development if approved, it would have a major negative impact on:

- the environment, through:
  - loss and disruption/isolation of Biodiversity Action Plan Priority Habitat;
  - concentration of human disturbance in, and disjointing of the important wildlife corridor along the west bank of the River Thames;
  - disturbance of non-target species by the Bird Management Plan, including Kingfishers and Herons
  - increase in fish mortalityresulting in loss of biodiversity.
- people, through;
  - the loss of a valued landscape used extensively for recreation and both a local and national level;
  - a reduction in the ability of nationally and locally important rowers to train safely and effectively;
- RAF Benson, through the increased risk of bird-strike;
- air quality, through the cumulative impact of emission of NO<sub>2</sub> on the Wallingford AQMA and on Portway;
- traffic, through the cumulative impact on the Winterbrook roundabout; and
- Tourism and the local economy

Councillor Adrian Lloyd  
Wallingford Town Council

## Appendix 1 Location of Recent Planning Consents in Wallingford



**Joint consultation response by Cholsey Parish Council and Wallingford Town Council to planning application MW.0033/18 by Greenfield Associates for sand and gravel extraction at White Cross Farm and restoration to a marina.**