

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.