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CONTACT OFFICER: Katherine Pearce

registration@southandvale.gov.uk Tel : 01235 540546 Textphone: 18001 01235 540546

> Abbey House, Abbey Close Abingdon OX14 3JE

Ref: P21/S3961/CM

Via email Mary.hudson@oxfordshire.gov.uk

Dear Ms Hudson,

25 November 2021

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.

I wrote on 14 October setting out the District Council's objection to the application. I also informed you that I would write again when I had received all of the technical consultation responses from officers at the District Council. I therefore include comments relating to trees and drainage that may be helpful to you in considering the application.

My previous letter contained the comments from the Council's Landscape Officer and I note that the County Council's Landscape Officer also objects to the proposals.

The District Council's Countryside Officer has deferred to the County Ecologist for comment, and I note those comments have been made.

Drainage

The Council's Senior Flood Risk Engineer has made the following comments:

<u> "Flood Risk</u>

The Environment Agency should review the flood model for this site to assess the effect on flood risk as a result of the proposed extraction works given the location in Flood Zone 3 and high groundwater table present.

The Flood Risk Assessment identifies that the proposal relates to water compatible development and is therefore appropriate for the flood zone.

There are existing flood relief culverts and associated swales running under the A4130 and these will need to be retained. If this application is recommended for approval, a condition requiring no works within 10m of the top of bank of this ordinary





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watercourse without prior consent of the local planning authority should be included.

Surface Water Management

Surface water management is considered in the Hydrogeology Assessment prepared in support of the application. This report highlights that given the high hydraulic conductivity of River Terrace Deposits, surface water runoff from the site is likely to be relatively small with the majority of rainfall currently recharging groundwater. It is confirmed that during the extraction works, there will be a requirement for dewatering. This will require the consent of the Environment Agency. There will be significant volumes of silt created during the extraction and washing process and a plan for the management of this process would need to be submitted by condition on a phase-by-phase basis to reduce the risk of silt entering the watercourse. A Materials Management Plan would also need to be provided on a phase-by-phase basis to fully demonstrate how the site will be operated to avoid stockpiles being located within flood risk areas.

The application documents provide only minor information on proposed surface water and foul drainage to proposed buildings and further information would need to be secured by condition.

Any changes to the existing on-site ordinary watercourses will require Land Drainage Consent from the District Council. Application forms can be obtained from <u>engineering.services@southandvale.gov.uk</u>"

Trees

The Area Tree Officer has made the following comments:

"The submitted Tree Survey Report and Impact Assessment dated April 2016 relates to a previous application, is out of date and is not fit for purpose for this application.

Therefore, the report should be updated to reflect this proposal and an accurate assessment of the impact of the proposed development can be made.

The proposed bunds, extraction and other works on the site all have the potential to have a significant adverse impact on trees throughout the site. The proposed bunds appear to be located within the root protection areas of trees adjacent to the West boundary and is likely to lead to the loss of trees along this boundary. The extraction areas also appear to be located close to trees to be retained and are likely to have adverse impacts on their long-term retention.

Without the arboricultural information being updated, I consider that the applicant has failed to demonstrate that the proposal could be implemented whilst satisfactory protecting the trees throughout the site and has failed to demonstrate compliance with Policy ENV1 of South Oxfordshire Local Plan Local Plan 2035.

The updated arboricultural report should also include an Arboricultural Method Statement and Tree Protection Plan, to demonstrate how the root protection areas of trees will be satisfactorily protected during proposed works."



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Conclusion and Consultation

The District Council would like to reiterate its objection to the application and that the harm of the proposal significantly outweighs the benefits, and therefore recommend that planning permission should be refused.

We have now received 84 objections to the application from members of the public and one from Crowmarsh Parish Council. You have kindly said that you will be able to take these comments into account in reviewing the application, as they are publicly available on the District Council's website. Should re-consultation occur this Council asks that you directly notify these residents (where you have contact details) and others that may be affected by the development as part of public consultation.

Yours sincerely,

Adrian

Adrian Duffield Head of Planning