

Planning

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Listening Learning Leading

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17 May 2022

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.

Thank you for reconsulting the District Council on the amendments to the above application. The submitted information does not change the **objection** of the District Council to the scheme, as set out in previous correspondence. Specialist officers at the Council have viewed the documentation and have provided comments on key issues.

The Council's Landscape Officer maintains their objection to the scheme and has made the following comments:

"Additional information was requested by the County Council and has been submitted, including the following.

Further details of proposed bund, heights and materials – these are largely as anticipated in previous comments, but with some additional soil storage bunds in the north western part of the site.

Clarification on retention of central hedgerow / A detailed landscape scheme – a plan of similar detail to the previous submission is included; the central north- south hedgerow in the southern part of the site is shown as retained with additional tree planting, otherwise the proposals appear to be largely the same. Previous comments on the restoration proposals still apply.

An alternative to straw bales – straw bales are still indicated to be used to screen the Thames Path, to be placed and removed progressively in sections, in the revised phasing plans. The placing of the bales as indicated on the phasing plans would allow views of the working areas from locations to the north and south of the bales on the Thames Path. I share the concerns of the County Council Landscape Officer over the appearance and safety of these.

Conclusion

The additional information provided does not change my previous comments. Due to the sensitive location of the site and the nature of the proposals, they would result in adverse landscape and visual impacts, including adverse effects on the setting of the River Thames, the Thames Path and the Chilterns AONB. This would be contrary to policy ENV1 of the SOLP and paragraph 176 of the NPPF."

The Council's Forestry Officer has made the following comment, demonstrating that the proposals have not adequately considered the trees on site and their constraint upon development:

"The applicant has submitted an updated Arboricultural Report, Arboricultural Implications Assessment dated February 2022.

As set out at section 6.1 of the report, the proposal will require the removal of 7 groups of trees and 6 individual trees. These trees were categorised as having low arboricultural quality and should therefore not be considered a constraint to the proposed development, from an arboricultural perspective. Suitable mitigation planting will however be required to mitigate their loss.

There appears to be conflicting information regarding the extent of the extraction area shown on the plans found within the Arboricultural Report and those shown on the latest submitted Phasing Plans and other submitted plans. For example, the Arboricultural Impact Assessment plan Date 18/03/22 shows the excavation limits avoiding the root protection area (RPA) of T70, a high quality poplar tree. Whereas on the Phase 1 plan (Ref No: KD.WLF.D.005 Rev A Dated March 2022) and the majority of other submitted plans, the proposed limit of extraction is almost against the tree's stem and well within the RPA of T70, which would lead to the trees loss. This is also contrary to 6.4 of the Arboricultural Report, that states Excavations limits have been adjusted to avoid the RPA of the Category A Black Poplar tree T70 . As a result of this, if permitted, the development will have much greater arboricultural impacts than is currently shown within the Arboricultural Report and therefore the arboricultural impacts have been significantly underestimated.

It would appear also from overlaying the arboricultural constraints on the Arboricultural Plans onto the other submitted plans and by measuring the plans, that the bunds 2 and 3 are in the RPAs of the poplars to the North and Bund 1 is in the RPAs of trees located to the West and therefore likely to adversely impact on these trees. In its current form due to the above reasons, I consider that the applicant has failed to demonstrate that the proposal could be implemented whilst satisfactory protecting the trees throughout the site that are shown to be retained in the Arboricultural Report and has failed to demonstrate compliance with Policy ENV1 of South Oxfordshire Local Plan Local Plan 2035.

The plans should be amended and the layout, including extraction areas and bunds redesigned to accurately reflect the arboricultural constraints that have been identified on the Arboricultural Plans.

If permission is to be granted for this application, then a comprehensive landscaping scheme will be needed, to soften the proposed development and mitigate the tree loss that will be required.

A condition would also be required to secure an arboricultural method statement and tree protection plan, in accordance with BS 5837:2012 to minimise impact on trees to be retained."

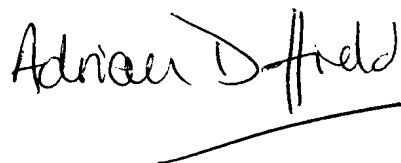
The Council's Drainage Engineer has no comments to add and note that the detailed modelling provided is being reviewed and assessed by the Environment Agency. The applicants are reminded that any changes to the existing on-site ordinary watercourses will require Land Drainage Consent from the District Council. Applications forms can be obtained from engineering.services@southandvale.gov.uk.

Conclusion

The conclusion remains the same as previously stated: that the proposed development is not in accordance with Policies ENV1 and ENV7 of the South Oxfordshire Local Plan and Policy E3 of the Cholsey Neighbourhood Plan. The benefits of the proposal do not outweigh the harm.

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