# Planning Application Response

# Landscape

To: Mary Hudson

From: Haidrun Breith, Landscape Officer, Oxfordshire County Council

Site: White Cross Farm, Reading Road, Cholsey, Oxfordshire

**Detail:** Additional Information - 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: 7<sup>th</sup> June 2022

Recommendations: Objection.

#### **Additional Information reviewed:**

- Landscape Masterplan LMP22-1
- Additional Information Landscape (Kedd)
- Landscape appendix B Arboricultural Impact Assessment
- Landscape appendix C Proposed bunds and straw bales
- Revised application plans
- LVIA (Kedd)

# 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.

# **ADDITIONAL Landscape comments**

The key landscape planning policies and landscape character context are outlined in my previous comments, which should be read in conjunction with these comments.

Additional information relating to landscape and visual matters has been provided. This includes further information on mitigation, the appearance of the proposed bunds, HGV movements and an updated tree survey as requested in my previous comments. It also provides further detail on a number of other issues including impacts on the AONB and its setting, tranquillity and policies.

# Tree survey and Aboricultural Impact Assessment (AIA)

An updated tree survey has been provided which concludes that the proposal will result in the loss of six relatively low-grade trees and seven groups of trees.

Most of the vegetation within the centre of the application site will be lost with the exception of the linear vegetation feature that runs in north-south direction across the application site (groups G12 & G13), which will be retained.

Boundary vegetation along the western, northern and eastern boundary is largely retained with the exception of the access and exit points, and a group of blackthorn scrub (G14) at the southern end of the site.

It considers that the creation of construction exclusion zones through appropriate approved fencing can ensure adequate protection and prevent lasting damage of retained trees, and that the restoration plan will restore and enhance lost canopy and vegetation cover over time.

I am not an arboriculturist but this approach seems acceptable to me subject to appropriate replacement planting and subject to the trees and their root protection areas (RPA) being adequately protected from both excavation and storage of material including bunds.

I note that the proposed phasing plan shows the extraction areas and the bunds tightly drawn around the existing vegetation suggesting that RPAs might be encroached upon. This will need to be addressed on the drawings and any mineral calculation, and a condition will be required to ensure adequate tree protection is put in place should the development be approved.

# **Mitigation Measures**

The additional information includes further detail on the mitigation measures proposed in the LVIA.

# • Retention of existing periphery vegetation and additional planting:

Existing boundary vegetation is proposed to be retained and to be strengthened with additional planting to help screening quarrying operations from nearby roads and properties. New planting along the periphery will help to strengthen the landscape structure along the boundaries post restoration but as planting takes time to mature it is unlikely to be effective during operation.

# Grass-seeded bunds

Bunds are proposed along the western boundary and near the Reading roundabout to mitigate views from the West of the site. Bunds are commonly used in connection with quarries but can be uncharacteristic elements in the landscape in their own right. Additional information has been provided on the height, make-up and location of screening bunds.

Both topsoil bunds (3m) and subsoil bunds (5m) are proposed to be placed alongside the existing boundary vegetation along the western boundary and near the roundabout. Care will need to be taken that these are placed outside the RPAs as required by the AIA. The bunds will be reasonably well screened during the summer months but are likely to become more visible through the vegetation during the winter months when vegetation is not in leaf.

The combination of existing boundary vegetation together with bunds is expected to be largely effective in mitigating impacts of operations within the site on low-level views from the West and Northwest. Visibility of operations within the site is likely to increase when bunds are removed to enable the extraction of the material from underneath the bunds. The 10m high raised stockpile might also be visible in views above the boundary in selected local views.

Views of the development from the entrance and exit points will be possible. The Proposed Phasing Plan suggests that no bunding is proposed immediately north of the site entrance so that the HGV parking, office and welfare facilities, as well as the 10m high 'as raised stockpile' mound are likely to be visible in glimpsed and intermittent views through the existing boundary vegetation, especially during the winter months when the vegetation is not in leaf.

Occasional views into the site will also remain possible from Nosworthy Way at the proposed exit point and east of it, where the A4130 runs on an embankment towards the River Thames bridge. Existing trees and scrub will provide some screening from this elevated position but occasional views into the site are likely to remain possible through gaps in the trees. Visibility will also increase during the winter months when trees are not in leaf.

# Straw bales

These are proposed to mitigate the visual impacts of the development on users of the Thames Path, the River Thames and the AONB. I have not been able to find any information on the height and type of the quarry safety fence or the straw bales. The typical cross-section on sheet 17 indicates the fence to be lower than the height of the straw bales and I'm not clear how this will overcome safety concerns. The location and alignment of the cross-section is also not clear as phase 2 is located further South than the plant site.

It is not clear how high the bales are proposed to be stacked, what the proposed size of the individual bales is, how they will be secured, nor what the expected functional lifespan is and replacement period.

Even if they were to be stacked to a height that provides low-level screening of the machinery and processing equipment in views as suggested, I remain unconvinced that they will be fully effective in filtering out noise and activity associated with the quarrying operations.

Despite being a natural material that is associated with agriculture I expect that the straw bales will look incongruous in the landscape when used as a long linear barrier as proposed. Straw bales also have a tendency to deteriorate and become unsightly, which will increase their impact on views. As the screen will be in sections, views into the site from the north and south might also remain possible.

The straw bales are proposed to be set back by 30 metres from the bank of the River Thames. The Thames Path runs roughly in parallel to the river bank but its distance from the bank varies with the path running in closer proximity to the straw bale bund and excavation areas in places.

In order to provide further mitigation to views from the Thames Path, the additional information suggests delivering a clear bankside route closer to the edge of the River Thames. This will require creating a passage through existing dense vegetation, which has the potential to adversely affect riverside vegetation and biodiversity. If such a measure was to be considered, it is important that its acceptability is discussed with the Public Rights of Way officer, the Thames Path National Trail officer, the Parish Council and other interest groups associated with this long-distance national path.

I remain unconvinced that the straw bales will be effective in mitigating views from the East and believe that the Thames Path will be highly impacted upon during operation due to its proximity to excavation areas and the intrusive nature of the development, which will adversely affect the

tranquillity and perception of the wider area, including users of the Thames Path, the River Thames and residents or visitors to the Carmel College on the other side of the river.

# • Progressive restoration

It is recognised that the site will be worked in phases and that only parts of the site will be worked at any one time. The additional information (sheet 3) suggests that 40% (the eastern part) of the land would be restored by phase 3 reducing the impact on users of the Thames Path. No timescale is given on when this point might be reached. Whilst progressive restoration will assist in gradually mitigating visual effect from the Thames Path over time, adverse impacts caused by the nature of the development (e.g. heavy machinery, noise, dust, HGV movements) will remain, and will continue to adversely affect the perception and the enjoyment of the local area.

It is also important to remember that the restoration of habitats will take time. Progressively restored areas will not deliver immediate landscape and visual benefits but will take years to establish and to achieve a similar landscape and visual condition.

I note that the information suggests a maintenance period for five year. A longer-term management will be required for habitats associated with achieving Biodiversity Net Gain

Proposed mitigation measures will assist in reducing effects on some visual receptors, but I don't believe that they will be fully effective in mitigating adverse effects of the development on users of Nosworthy Way and the Thames Bridge, the River Thames, the Thames Path or the Chilterns AONB.

# LVIA / Impact of the development

The LVIA concludes that the development will not cause any significant adverse landscape or visual effect. As stated in my previous response I believe that the LVIA is understating impacts on the local landscape character and selected views. The following examples provide further detail why I consider this to be the case.

# Landscape effects

I believe that the landscape effect for the site has been underestimated during operation due to a combination of underestimating the value and related sensitivity of the site, and the magnitude of impact. I consider the sensitivity level of the local area (site level) to be higher than *medium* as assessed in the LVIA as I judge the scenic quality, the recreational value, tranquillity and the cultural and historic aspects to be greater than stated.

Scenic quality: The LVIA assesses the scenic quality of the site to be *medium* but I consider it to be higher. The scenic quality can be appreciated from the Thames bridge, the Thames Path National Trail, the River Thames, Nosworthy Way and in glimpsed views from across the river. The river and its riparian context of floodplain agricultural uses on one side and the parkland character with listed buildings and boat houses on the other side add interest and scenic quality to the site. The Wallingford bypass is visible in sections but partly screened by vegetation, the bridge itself is functional but not intrusive and it still allows connectivity along the river underneath it. I therefore judge the scenic quality to be *high rather than medium*.

Recreational value: The site is very popular for informal recreation by people walking the Thames Path, dog walkers or by people enjoying water related activities such as fishing, paddling, boating and rowing. Some of the university boat clubs are located a short distance north of the site and regularly use this stretch of the river for training purposes. Unlike some other areas along the River Thames this stretch of the river also offers several opportunities for easy access into the

water. I therefore consider the recreational value as high rather than medium to high as stated in the LVIA.

- Tranquillity: tranquillity has been assessed as being low to medium. The Thames Path runs along the River Thames underneath the Nosworthy bypass bridge. Being lower lying than the bypass, and being accessed via a long ramp that is framed by vegetation the site feels somewhat detached from the road even though traffic on Nosworthy Way is audible and partly visible. Although the site is not tranquil as such, the river and its riparian landscape setting (including the site) offer relative calmness. I do not consider Nosworthy way as intrusive in views as suggested, and noise levels also decrease with increasing distance from the roads. I would therefore judge tranquillity levels to be at least medium to high rather than low to medium.
- Cultural and historic aspects: The site is set in a context that increases the sensitivity of the site. Not only does the site include a section of the Thames Path National Trail and directly abuts the River Thames and the Chilterns AONB, but it is also only a short distance from the Ridgeway National Trail, three conservation areas, the NWD AONB and located opposite three listed buildings set in parkland. Whilst the eastern bank of the river is largely vegetated with parkland trees, glimpsed views from historic buildings such as the Grade II\* listed St John's the Baptist church are possible during winter months adding interest and offering a sense of time depth. The importance of the river setting on the historic interest within the Carmel College site is also highlighted in the Historic England response. I consider the cultural and historic context to be at least high rather than medium-high.
- Rarity: The site is not rare but it is characteristic. The site can be recreated but it will take time for it to reach similar character and condition.

Based on the above I consider overall sensitivity levels of the site to be high rather than medium.

The LVIA considers the overall magnitude of impact on the landscape character of the site to be *medium adverse* during operation (table 2).

The proposal will introduce quarrying activity and therefore movement of heavy quarrying equipment, stockpiles, noise, dust, lighting and HGV movements into a rural area next to the River Thames and which directly adjoins the AONB.

The site shows many of the characteristics outlined in the SODC LCA. Even though the majority of the boundary vegetation is proposed to be retained, quarrying operations will result in the loss of characteristic agricultural land uses (including pasture and some best and most versatile agricultural land) and habitats, and it will also adversely affect the tranquillity, and enjoyment of the River Thames and the Thames Path. Operations are proposed to last five to six years but it will also take several years for habitats to reach a similar character and quality as existing. I consider the magnitude of impact during operation to be higher than stated, i.e. as *high adverse* during operation, resulting in a *notable adverse* (*significant*) overall effect on the local landscape character.

Notwithstanding that the restoration will deliver biodiversity benefits, the creation of habitats will only offer a limited uplift in the landscape character and visual terms. The site already comprises land uses, structure, vegetation, habitats, views and recreational value that are characteristic for this landscape character area so that the restoration will only offer a small improvement in landscape character terms. The restoration will also only result in a minor visual improvement in the long-term through strengthened boundaries, water bodies and wetland habitats.

I therefore suggest that the restoration will only offer a 'low beneficial magnitude' resulting in a slight to moderate beneficial effect in the long-term. This benefit would heavily depend on the adequate

implementation and long-term management of habitat, i.e. 25+ years, which would need to be secured should the development be approved.

#### Visual effects

As with the landscape character I consider that some of the operational visual effects have been underestimated, due to an underestimation of the sensitivity and/or magnitude of impact of some visual receptors.

Users of the Thames Path National Trail (VP1/5):
 The LVIA assessed users of the Thames Path to have high sensitivity and the magnitude as low to medium adverse.

The Thames Path National Trail is one of the special qualities of the Chilterns AONB as outlined in the Chilterns AONB Management Plan. The value of National Trails has also been recognised in the Glover Review on Protected Landscapes. Based on this and the immediate proximity of the Thames Path to the development I believe that the Thames Path National Trail should be given the same level of sensitivity as AONBs, i.e. *very high*.

Views from the Thames Path will be directly impacted on by the line of straw bales a short distance from the path restricting the view, or, where views past the straw bales exist, by the introduction of detracting elements of quarry plant equipment and stockpiles into the site. The bales themselves will look incongruous in the view and will adversely affect the extent and character of the views currently experienced from the path. These effects will be further accentuated by the nature of the development (eg noise) which will change the perception of the area and the viewer. I would judge the magnitude of impact at least as *medium to high* resulting in a *notable* (*significant*) effect.

Users of the River Thames (VP1/6):
 The LVIA assess users of the river as medium sensitive and the magnitude as low resulting in a slight adverse effect.

Users of the river do not only comprise boats and rowers but also people engaging in less transient water-related activities such as paddling, swimming, fishing or by people sitting on the bank. The Chilterns AONB boundary runs along the western bank of the River Thames and as such the river forms part of the Chilterns AONB. In reflection of this and the importance of the River Thames corridor in landscape character and visual terms, and that the majority of the recreational activities focus on the enjoyment of the outdoors and surrounding landscape I believe that the sensitivity of the receptors should be at least *high*.

The magnitude of visual impacts is likely to vary with receptor groups but will for some users be similar to those experienced on the Thames Path. I consider the magnitude of impact to be at least *medium* resulting in a *notable/moderate* effect.

Users of Nosworthy Way at the River Thames Bridge (VP 4/24)
 Table 4 (Assessed significance of visual effects) only appears to cover motorists at this viewpoint with pedestrians being addressed as part of in VP 4/25 further West on Nosworthy Way. However, I consider it important that not only the impact on motorists but also on cyclists and pedestrians are assessed for this viewpoint as it is an important crossing point across the river.

The bridge offers a partial view of the site in the context of the River Thames from the elevated position, which will be particularly appreciated when travelling from East to West. The LVIA considers both motorists and pedestrians to be *low sensitivity* for this elevated position but I believe that it should be *low to medium* for motorists and *medium to high* for pedestrians, as the latter tend to take in more of their surroundings. The bridge is used by a large number of vehicles, and motorists will experience the opening up of views across the river and the site at this point. With regard to pedestrians, the bridge it is a key connector between two National Trails, the Ridgeway on the East side of the river and the Thames Path West side of the river, and it is therefore an important pedestrian route.

Users of the bridge will experience partially restricted views across the site looking south. The proposed plant site together with areas of excavations and storage piles will introduce uncharacteristic intrusive elements. I consider the magnitude of impact for motorists and pedestrians to be *medium*. This would result in a *slight to moderate effect* for motorists and *moderate-notable effect* for pedestrians.

- St John's the Baptist church in Carmel College (VP 1/2) I agree with the LVIA that sensitivity of this listed building is high. The LVIA considers the magnitude of impact to be very low, however, I believe it should be slightly higher to reflect the greater availability of views during the winter months. The impact on tranquillity will also affect the experience of visitors to the site and listed buildings. Similar concerns have also been outlined in the Historic England response. I would therefore suggest the impact to be at least low resulting in a moderate adverse effect.
- Elizabeth House nursery and pre-school (VP 5/29)
  I agree with the LVIA that sensitivity of this receptor as high. The LVIA considers the magnitude of impact to be low to medium, however, I believe this should be higher to reflect the greater visibility during winter months and that the pre-school uses the garden on the side of the building as a forest school. The retained boundary vegetation and additional 5m bunding will assist in mitigating effects but will be less effective from upper floor windows and once the bunding is removed. This receptor is also close to the entry point to the site and is therefore likely to experience HGVs turning into the site, which might cause additional impact. The magnitude of impact should in my view be at least medium, which would result in a notable/moderate effect.
- Residents / visitors to the Wet Boat House (VP 1/1)
  I agree that the sensitivity level of the receptor is high but consider that the magnitude of impact will be greater than low. Users of this house currently have clear views across the river. Riverside vegetation along the western bank of the Thames partially screens views into the site but uncharacteristic elements of straw bale screen or quarrying machinery might be partly visible especially during the winter months. Viewers from this viewpoint will also experience a change in tranquillity caused by the development. I therefore consider the magnitude of impact to be slightly higher, i.e. medium rather than low, which would result in a notable/moderate effect.

# Impact on the Chilterns AONB

With regard to the impacts on the Chilterns AONB the LVIA considers the sensitivity level of the AONB to be *very high* and the magnitude to be *low adverse* resulting in *a moderate adverse effect*.

Tranquillity is one of the special qualities of the AONB. The introduction of quarrying activity into the site will abruptly change the landscape character and perception within the application site. It will

also adversely affect the tranquillity beyond the site boundaries including the River Thames and areas on the eastern side of the river, latter of which form part of the AONB. The AONB and its setting is also experienced from the Thames Path, which will be adversely impacted by the proposals.

Whilst I agree with the *very high sensitivity* level, I consider the magnitude of impact on the Chilterns AONB, which includes the River Thames to *be at least medium*, resulting in a *notable adverse* (*significant*) effect during operation.

# LVIA summary:

Based on the above assessment the development will significantly affect the landscape character of the site, the Chilterns AONB and users of the Thames Path during operation. Users of the River Thames, the Thames bridge, Elizabeth House, the Wet Boat House and other buildings in the Carmel College site are also expected to be more affected than stated in the LVIA.

# **AONB** and setting

The Chilterns AONB Management Plan Policy DP4 and the board's position statement on 'Setting' offer the following guidance on development in the setting of the AONB:

# CCB Policy DP4 states:

"In the setting of the AONB, take full account of whether proposals harm the AONB."

# CCB Position statement on setting states:

"4. The Board considers that, although it does not have a defined geographical boundary, the setting of the Chilterns AONB is the area within which development and land management proposals, by virtue of their nature, size, scale, siting, materials or design could be considered to have an impact, either positive or negative, on the natural beauty and special qualities of the Chilterns AONB. ...

16. <u>Adverse impacts might not be visual</u>. <u>The special qualities of the Chilterns AONB include tranquillity.</u> A development which is noisy may well impact adversely on tranquillity even if not visible from the AONB."

(my underlining).

Examples of adverse impacts on the setting of the AONB are given under 15) and include amongst other things the loss of tranquillity through the introduction of lighting, noise, or traffic movement, and the introduction of significant or abrupt changes to landscape character particularly where they are originally of a similar character to the AONB. I consider both of these impacts to apply to the proposed development on this site during operation, and therefore consider the development to adversely affect the setting of the AONB.

The special qualities of the AONB are outlined in the AONB Management Plan and include amongst other things relative tranquillity and the extensive public rights of way networks including National Trails, i.e. the Ridgeway and the Thames Path. Both of these qualities are relevant to this site and will be adversely affected by the proposed quarrying operations.

The Chilterns AONB Management Plan further states in policy PD1 that planning decisions should take full account of the importance of conserving and enhancing the natural beauty of the AONB and the great weight given to its protection in the NPPF. It states further in the supporting text that:

"Planners must assess impacts on natural beauty which are both direct, like loss of habitat for construction or a proposed new building of unsympathetic design, and indirect, like a new development affecting traffic levels, air quality, chalk streams and tranquillity in the AONB." (my underlining).

The proposal will introduce quarrying activity and therefore heavy machinery, noise, lighting, HGV movement into a rural area adjacent to the River Thames and the Chilterns AONB that is popular for informal recreation.

Impacts of noise and activity from the development will not only be experienced within the site boundary but are also expected to adversely affect levels of tranquillity beyond the site itself including the river (which forms part of the AONB) and other nearby sensitive locations in the AONB such as the heritage interest in the Carmel College site.

The Thames Path runs along the river and the boundary with the AONB. The Thames Path is one of the special qualities of the Chilterns AONB but is in this case also part of the setting, from which the special qualities of AONB can be experienced (e.g. tranquil river environment, views across the river). Although views from the Thames Path towards the AONB will remain possible, the extent and character of views from the path will be impacted by the development and associated mitigation measures. The development will also by its nature adversely affect the perception, tranquillity and enjoyment of users of the Thames Path and the River Thames, and by doing so adversely affect the Chilterns AONB and its setting.

# Planning policy considerations

The applicant makes the case that there is a need for quarrying the mineral of this site. It is for my policy colleagues to advise on this, but it is important to note that the site is not an allocated minerals site and that the Mineral & Waste Plan (MWP) Site Allocation process is ongoing.

#### NPPF (2021)

Paragraph 176 of the NPPF requires that great weight is given to the landscape and scenic beauty in Areas of Outstanding Natural Beauty, which have the highest status of protection on these issues. It also states:

"The scale and extent of development within all these 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." (my underlining).

The policy requires development within the setting of AONBs to be sensitively located. This includes avoiding sites that are sensitive in landscape and visual terms, and where development would adversely affect the AONB.

Mitigation should be used where impacts cannot be avoided through appropriate site selection, or where no other options exist. The applicant is seeking to minimise the impacts and I believe that proposed mitigation measures will assist in reducing effects on selected receptors, however, I don't consider them fully effective in mitigating adverse effects on the local landscape character, the Thames Path, or the AONB as it is demonstrated in the paragraphs above. This is due to the site's sensitive location next to the River Thames, the Thames Path and the Chilterns AONB, and the intrusive and industrial nature of the development.

I do not consider the development to satisfy the requirements of this policy as the development is not sensitively located by choosing a site that is sensitive in landscape and visual terms, nor is it able to effectively mitigate adverse impacts on the local landscape character, on users of the Thames Path and the AONB during operation.

# MWPCS Policy C8

Policy C8 requires proposals for minerals to demonstrate that they respect and where possible enhance the local landscape character, and to include adequate and appropriate measures to mitigate impact on the landscape, which should include careful "siting, design and landscaping". It also states that where significant adverse impacts cannot be avoided or adequately mitigated, compensatory environmental enhancements shall be made to offset the residual landscape and visual impacts".

In its second paragraph the policy requires that great weight is given to conserving the landscape and scenic beauty of Areas of Outstanding Natural Beauty (AONB) and to the enhancements of the natural beauty. It further states that "Proposals for minerals and waste development within an AONB or 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."

The supporting text (para 6.44) states that setting of and views associated with the Chilterns, Cotswolds and North Wessex Downs AONBs should also be taken into account in considering development proposals. Footnote 103 further states that the relevant AONB Management Plan should inform the consideration of proposals for development within or in proximity of an AONB.

The requirement that adverse impacts on the landscape should be avoided or mitigated through appropriate siting is similar to the requirement in the NPPF. As outlined above I consider the development not to be sensitively located by choosing a site that is sensitive in landscape and visual terms, and where adverse landscape and visual effects have been found not to be effectively mitigated during operation.

The policy offers the opportunity for compensatory measures in situations where significant impacts cannot be avoided or mitigated. The application proposals do not include any compensatory measures, and such measures are also unlikely to be appropriate in this case as the development will not result in residual landscape or visual effects in the long-term.

The second paragraph of the policy requires that great weight to be given to conserving the landscape and scenic beauty of the AONB, which again is similar to the requirement of the NPPF.

The policy further recognises the importance of the AONB and its setting, and refers to the Chilterns AONB Management plan for developments that would significantly affect the AONB. Significant effects on the site's landscape character, users of the Thames Path and the AONB have been identified during operation. Relevant Management Plan policies and the impact on the AONB are outlined under the 'AONB and setting' heading above.

<u>SOLP Policy ENV1</u> states that development affecting the setting of an AONB will only be permitted where it conserves, or where possible, enhances the character and natural beauty of the AONB. It also states that *South Oxfordshire's landscape countryside and rural areas will be protected against harmful development. Development will only be permitted where it protects, and where possible enhances, features that contribute to the nature and quality of South Oxfordshire's landscapes, in* 

particular... the landscapes, waterscapes, cultural heritage and user enjoyment of the River Thames... areas or features of cultural and historic value...aesthetic and perceptual factors such as tranquillity, wildness, intactness, rarity and enclosure."

The development will not conserve or enhance the character and natural beauty of the AONB during operation. It will also not protect the countryside including the landscape and enjoyment of the River Thames or conserve or enhance perceptual factors such as tranquillity.

# **Conclusion:**

The additional information does not change my previous comments. The development would introduce a highly industrial use into an agricultural area that is considered sensitive in landscape and visual terms due to its location adjacent to the Chilterns AONB, the River Thames and the Thames Path National Trail.

The introduction of noise, heavy machinery and HGV movements would significantly affect the site's landscape character and users of the Thames Path during operation, adversely affecting the AONB and its setting.

Whilst operational impacts would be temporary and the site would be restored to agriculture and nature conservation in the medium-term, restoration would only deliver a slight to moderate uplift in landscape and visual terms compared to the current situation, not justifying the operational impacts of the development on landscape character, views and the AONB.

I consider the development not to satisfy the requirements of para 176 of the NPPF, policy C8 of the MWPCS, policy ENV1 of the SOLP and the Chilterns AONB Management Plan and can therefore not support this application.

#### **Conditions:**

A number of landscape conditions will be required should the development be approved.