

Mary Hudson
Principal Planning Officer
Oxfordshire County Council
County Hall
New Road,
Oxford, OX1 1ND

Our Ref: LRS/WAL/110
Your Ref: MW.0115/21

22nd July 2022

Dear Mary

**Planning Application for the Extraction and Processing of Sand and Gravel on
Land at White Cross Farm, Wallingford, Oxfordshire.**

We are writing to you in relation to detailed revisions we have made to our restoration scheme whilst maintaining the overall concept of restoring the eastern sector of the site to nature conservation and the western sector to agriculture.

These revisions, and associated information in relation to habitat establishment and biodiversity metric calculations, have been assembled in response to the Reg 25 consultation responses received from the MoD (Defence Infrastructure Organisation) and Oxfordshire CC Biodiversity Officer.

Attached to this letter are the following:

- Restoration Concept Plan 2022 v5
- Habitat Map (Windrush Ecology)
- Biodiversity Net Gain Calculation (Windrush Ecology) – based on Habitat Map

Set out below is our explanation of the approach we have taken, and the adjustments made in response to the comments.

MoD

Besides their comments on the management of birds (which we will respond on separately) the MoD made two quite specific recommendations regarding the restoration scheme:

1. That the shallow scrapes and water areas alongside the Thames are too extensive and therefore need to be removed from the proposals for the restored floodplain.
2. That the former lagoon should be designed to be unattractive to hazardous birds by fully enclosing the pond with dense vegetation like wet woodland and/or reedbed.

Given the nature of the MoD comments and the importance of safeguarding the defence infrastructure at RAF Benson you will see on the attached Restoration Concept Plan 2022 v5 that we have removed the scrapes and shallow areas of water previously proposed alongside the River Thames. You will note that the plan now confirms an extensive area of floodplain grazing. As part of this habitat, where the land will continue to be hydraulically linked to the River Thames, it is proposed to enhance the ditching by linking the existing main drain in the centre of the site (running south to north) with an existing ditch in the north-east corner of the site (which runs under the road embankment and connects to the River Thames), as well as connecting with the former lagoon feature of wet woodland and reedbed. These ditches are shown on the plan along with some representative cross-sections and effectively re-instate the general layout of the original ditch pattern.

We have also confirmed on this plan our proposal to restore the former operational lagoon to a mix of reedbed and wet woodland to provide the dense vegetation sought by the MoD.

Biodiversity Officer

To summarise, the Biodiversity Officer specifically requested an increase in the amount of “Coastal and Floodplain Grazing Marsh” (CFGM) to be delivered as part of the restoration. Her suggested requirement being a further 9.82 units of this habitat to meet Biodiversity “Trading Rules”.

In addition, she requested that:

- delays in restoration or early delivery of habitat to be taken into account in the metric calculations; and
- river units be accounted for in the metric calculations and the delivery of 10% net gain in river units.

Her response appears to be predicated on an overall principle of providing a net gain in habitat biodiversity on the site through the restoration scheme.

In relation to these comments, we wish to highlight the following:

1. The extent of Floodplain Grazing Marsh to be delivered a part of the restoration scheme has been increased significantly, which can be seen on both the Restoration Concept Plan 2022 v5 and the Habitat Plan (Windrush), to provide the number of units sought and comply with Trading Rules. As confirmed above, this includes enhancement to the ditch network on the site to facilitate damp conditions in the grazing land – hence the broad description of “Damp Meadow” on the Restoration Concept Plan 2022 v5. These revisions are also embodied into the attached biodiversity net gain calculations.
2. The metric calculations, which have been revised in regard to the adjustments to the restoration scheme, now accounts for a 3 years habitat creation delay in the eastern part of the site and a 5 years habitat creation delay in the west of the site. These calculations and timescales have had specific regard to the proposed phasing of extraction and infilling and the carrying out of restoration works in the phased programme of works.

3. To achieve maximum biodiversity net-gain the restoration scheme has been revised to include a greater amount of neutral grassland – which is shown on the Restoration Concept Plan 2022 v5 and the Habitat Plan (Windrush). This includes neutral grassland in the north-western corner of the site and neutral grassland establishment within the 30m corridor of undisturbed land adjacent to the River Thames (including an area in the north-east corner of the site adjacent to the road embankment). The plans also confirm the enhancement of areas of broadleaved woodland in the south of the site and the scheme will also include hedgerow enhancement and management. The effect of the revisions (and confirmations) is to achieve an overall biodiversity net gain of 14.24%.
4. We feel it is unjustified to specifically address river units in the metric calculations as there are no proposals for any development/operations within a 30m corridor from the riverbank. The key feature of the riverbank is its status as the Thames Path, which is well used by walkers and dog walkers. The emphasis within this strip of land and the riverbank, that sits outside the area proposed to be developed/operated, is on informal recreation rather than nature conservation. Therefore, the 30m corridor could have been excluded from the planning application – due to the absence of any development/operations – but has been included to provide the MPA with planning control. As confirmed on the Restoration Concept Plan 2022 v5 and the Habitat Plan (Windrush) it is proposed, following completion of operations, to enhance the 30m corridor with the establishment and management of neutral grassland which contributes positively to the overall biodiversity net gain. The MPA is capable of imposing planning controls to ensure the delivery of these proposals which reflect a positive approach to delivering biodiversity enhancement off-site within an area that is well established for recreational use.

Overall

We trust that all parties can see the genuine efforts that have been made to refine and adjust the restoration scheme to satisfy differing requirements and to support these revisions with plans and calculations that justify the approach.

In our view the restoration scheme represents an appropriate balance of maximising biodiversity, whilst utilising best and most versatile agricultural soils, and ensuring that the interests and safety of RAF Benson are not unacceptably compromised.

We consider that the end-uses are wholly appropriate to this location and comply with the thrust, spirit and specific relevant requirements of Policy M10 of the OMWLP CS Part 1 2017, and we do not believe there is evidence to suggest otherwise.

Having regard to this policy we would highlight the following:

- The proposals involve progressive, phased restoration over a relatively short duration.
- The proposed end-uses and the mix/location of those uses are appropriate to this location and the characteristics of the existing site, including floodplain grazing, grasslands as well as arable land (including best and most versatile soils).
- The restoration scheme will deliver biodiversity net gain in a way that is appropriate to the location and the existing uses.
- The scheme has specific regard to the proximity to the river Thames and the related recreational interests as well as nature conservation interests.
- The risk of bird strike and requirements concerning aviation safety in relation to RAF Benson have been carefully taken into account and attractiveness to flocking birds “designed out” of the proposed restoration scheme.

As you will recall, the applicant has given a commitment to put the areas of nature conservation into a programme of longer-term management (beyond the standard 5 years aftercare for agricultural land). In this regard we feel that planning weight should be attached to the delivery of biodiversity gains that will be delivered and sustained in this part of the Thames Valley as a consequence of the proposed temporary and relatively short-lived mineral operations.

We hope that you and your consultees can look favourably on the adjustments we have made to address their points.

Please contact us if you have any queries in relation to the submitted information.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'S J Rees', with a stylized flourish at the end.

S J Rees B.Sc., M.Sc., C.Geol, FGS, MIQ
for Greenfield Environmental