

Division Affected – Benson & Cholsey

PLANNING AND REGULATION COMMITTEE

Date 2nd September 2024

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

Report by Head of Strategic Planning

Contact Officer: Mary Hudson **Tel:** 07393 001 257

Location: Land at White Cross Farm, Wallingford, Oxfordshire

OCC Application No: MW.0115/21
SODC Application No: P21/S3961/CM

District Council Area: South Oxfordshire

Applicant: London Rock Supplies Ltd.

Application Received: 9th September 2021

Consultation Period: 16th September – 16th October 2021 (First consultation)
14th April – 17th May 2022 (First Reg 25 consultation)
14th March – 15th April 2024 (Second Reg 25 consultation)
30th May – 29th June 2024 (Third Reg 25 consultation)

Contents

- Part 1- Facts and Background
- Part 2 – Other Viewpoints
- Part 3 – Relevant Planning Documents
- Part 4 – Assessment and Conclusions

PART 1- FACTS AND BACKGROUND

Location (see Plan 1)

1. The application site is located approximately 1.5km to the south of Wallingford town centre within South Oxfordshire District. It is approximately 12 miles (20km) south-east of Oxford and approximately 11 miles (18km) northwest of Reading.



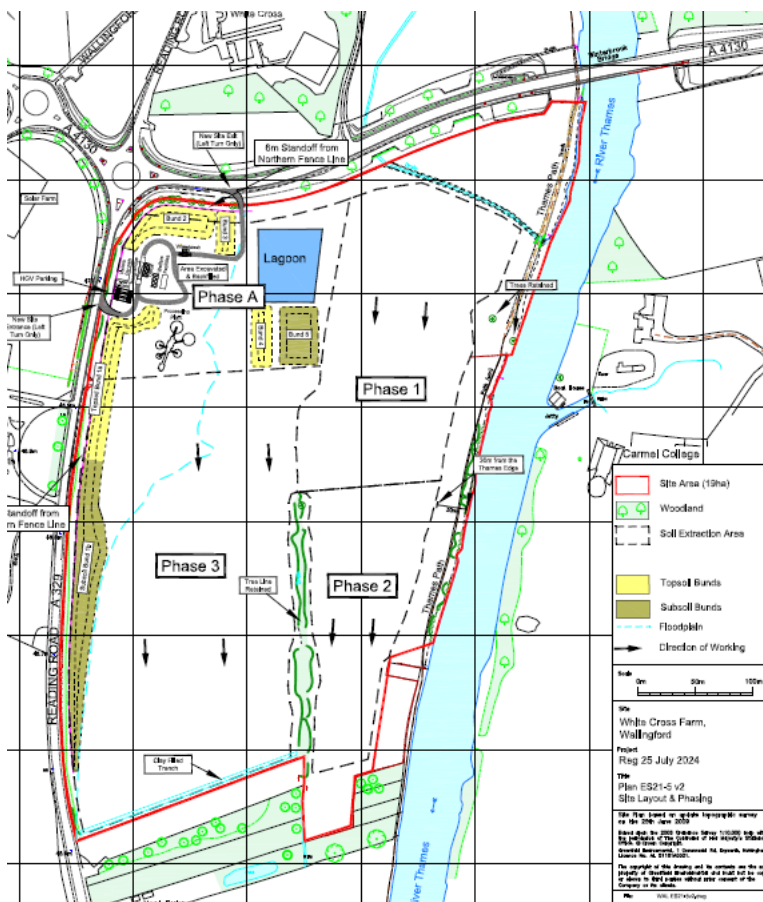
Plan 1 – Site Location

Site and Setting (see Plan 2)

2. The application site covers an area of 19 hectares. It is broadly rectangular with an irregular southern boundary. It is bounded by the River Thames to the east, Nosworthy Way (A4130) to the north and Reading Road (A329) to the west. It lies in a rural area beyond the boundary of Wallingford town and within the terrace farmlands landscape character area. This is a flat open, farmed landscape overlying river gravel terraces.

3. The site itself is used as grazing land with one field used for crops. There is a derelict barn in the central west section. 45% of the site area is classified as Best and Most Versatile (BMV) Agricultural Land.
4. Figures provided by the applicant state that 12.5 hectares (84%) of the site lies in Flood Zone 3 and 2.3 hectares (16%) lies in Flood Zone 1, with the area in Flood Zone 2 being inconsequential and difficult to measure. A drainage ditch runs north-south through the site, and another one cuts across the north-east corner and discharges into the River Thames. The site is not at increased risk of surface water flooding, except a very small area along one of the ditches in the north of the site, which is at low and medium risk, and another small area in the south west corner of the site, which is at low risk.
5. The Chilterns National Landscape (CNL) (formerly the Area of Outstanding Natural Beauty (AONB) abuts the site, as the boundary incorporates the River Thames which forms the eastern edge of the application site. A tiny part of the site (approximately 0.05 hectare) appears to be within the Chilterns AONB where the AONB boundary runs slightly out from the riverbank. The North Wessex Downs CNL/AONB lies approximately 1.6km to the west and 1.8 km to the south.
6. On the opposite riverbank to the application is Mongewell Park. This estate was occupied by Carmel College, a boarding school, until the 1990s. There are three Grade II listed buildings (Former Church of St John the Baptist, Jewish Synagogue at former Carmel College and Amphitheatre at former Carmel College) and one Grade II* listed building (Julius Gottlieb Gallery and Boathouse at former Carmel College) within the estate grounds. To the west of the site on Reading Road is a Grade II listed milestone. The former Carmel College site has planning permission to be redeveloped for housing (SODC application reference P11/W2357).
7. The Thames Path national trail runs alongside the River Thames along the eastern edge of application site. There are no other public rights of way within the site itself.
8. The river is around 40 metres wide in this location and used by boaters including those associated with the University of Oxford, Wallingford and Oxford Brookes University Rowing Clubs. There is a measured 2km course for rowing that starts to the north of the application site upstream of the Winterbrook Bridge (A4130 Wallingford bypass) and continues past the application site towards Goring Lock.
9. There are no sites of Special Scientific Interest within 2.5km of the site.
10. The eastern part of the site falls within the Thames Wallingford to Goring Conservation Target Area (CTA).
11. The site is not within the Green Belt. There is no ancient woodland near the site.

12. The closest residential property is Windward House, approximately 80 metres south of the application site. This has a private water supply located approximately 47 metres from the application area. Elizabeth House, a day nursery and preschool is approximately 60 metres west of the application on the opposite of Reading Road (A329). There is also a solar farm between Elizabeth House and Nosworthy Road (A4130).
13. The site is approximately 3km south-west of RAF Benson.
14. To the west of the site, beyond the A329, the solar farm development and Wallingford Road, there is another sand and gravel quarry at New Barn Farm. This lies approximately 200 metres from the application site at the closest point. Permission (MW.0094/16) was granted in 2018 and the site is fully operational with permission for extraction until 2037.



Plan 2 – Site and Setting

Planning History

15. A planning application (MW.0033/18) for the extraction of sand and gravel and restoration to a marina providing moorings for 280 boats, was made to OCC in 2018 and refused by Planning and Regulation committee in September 2020¹.

¹ [Agenda for Planning & Regulation Committee on Monday, 7 September 2020, 2.00 pm \(oxfordshire.gov.uk\)](https://www.oxfordshire.gov.uk/agenda-for-planning-and-regulation-committee-on-monday-7-september-2020-2-00-pm)

16. Prior to this there was no recent planning history on the site, however, several planning applications were made to the District Council on Land at White Cross Farm in the 1970s and 1980s. These include:
- P85/W0373 - Construction of fish farm – no decision issued
 - P77/W0423 - Erection of stock proof fences around and dividing the land as necessary to enable animals to be kept – permitted 19.01.1978
 - 77/W0190/E - Use for general dealing in incl. buying and dealing in hay, straw, tractors, JCBs etc, general agricultural machinery, trailers, buildings, government surplus and scrap, caravans and lorries, hire of farm equipment, farm contract work and repairs to machinery – Withdrawn 13.09.1978
 - SOW/421/77 - The winning and working of minerals and spoil generally for the construction of an agricultural fish farm – refused 08.03.1978
 - P77/W0169 - Use for fish production for food – withdrawn 11.07.1977
 - P72/R4998 - Site for boat mooring and mushroom cultivation sheds – refused 01.03.1973
17. Immediately south of the site, an application (P22/S4164/FUL) for the change of use of land to informal private leisure use; to include an area allocated to the open storage of non-motorised boats and the siting of a trailer storage shed was made to SODC in November 2022. This was a retrospective application and was refused. An appeal was lodged in October 2023. An enforcement notice (P23/S3506/DA) was served in relation to a material change of use of land from agriculture to a mixed sui generis use of leisure, outdoor education and outdoor therapeutic uses including facilitating development comprising the erection of wooden cabin with raised platform, wooden camping toilet cubicle, wooden sheds, wood stores and tree platform. An appeal was lodged in December 2023.

Details of Proposed Development

18. This application is essentially for the same development previously applied for under MW.0033/18, with the proposals amended to address the reasons for refusal of that application. Most significantly, the restoration and afteruse proposals have been changed so that it is now proposed to restore the land to agriculture and nature conservation using imported inert fill. The marina afteruse is no longer proposed.

Mineral Extraction

19. It is proposed to extract 550 000 tonnes of sand and gravel in 5 phases (A, 1, 2, 3 and 4) over a 5-year period, from a 15.5-hectare area within the 19-hectare site. It is anticipated that the annual output would be 140 000 tonnes. The site would be restored using 280 000 cubic metres of imported inert fill material. 180 000 cubic metres of soils and overburden would need to be removed in order to extract the mineral and replaced during the restoration. It is anticipated that the sand and gravel deposits are between 2 and 4 metres deep and the overburden is around 1-1.5 metres deep. Therefore, the total maximum depth of working

would vary across the site from a maximum of approximately 7 metres to around 3.5 metres adjacent to the Thames.

20. Mineral would be excavated using a tracked excavator, which would load the dug material onto a series of dump trucks. The dump trucks would take the material via internal haul roads to a stockpiling area adjacent to the processing plant. The first area to be stripped and extracted would be Phase A, where the plant would be located. Mineral would be extracted, and the area backfilled with inert fill, prior to constructing the site facilities and processing plant.
21. Extraction would then take place in a southerly direction in the eastern part of the site (Phases 1 and 2) and in a southerly direction in the western part of the site (Phase 3). The excavation would be dewatered and worked dry. This would also allow the void to be lined and backfilled with restoration materials. The water pumped from the excavation would enter a lagoon located in Phase A and measuring 66 metres by 55 metres by 5 metres deep. From there it would be discharged to the Thames via a ditch on the north-east boundary.

Processing Plant Site

22. Mineral would be washed and screened on site. The plant area would be established in the north-west part of the site, outside of the flood zone 3 in close proximity to the proposed new access and exit to the highway. Sand and gravel would be stored in temporary stockpiles, then processed through the plant. The washed and graded product would be loaded onto HGVs and transported. The plant site would include a weighbridge, car parking for 15 cars, HGV parking for 8 HGVs, an office building and a canteen building providing mess room and welfare facilities.
23. The full details of the processing plant have not been provided, but a plan has been submitted showing a typical processing plant layout. This shows a plant with a maximum height of 10.3 metres. The total area taken up by the typical processing plant including feed hopper and stockpiles of processed material is 43 metres by 54 metres.
24. Provisional elevations of the office and amenity portacabin structure have been submitted. This would be 9.7 metres long, 3.6 metres wide and approximately 2.5 metres high. The canteen unit would also be a portacabin and would be 8.5 metres long, 3.6 metres wide and approximately 2.5 metres high. Each structure would have a door and windows. A weighbridge office is also proposed. A plan of a typical weighbridge office building has been provided, showing a building which is 9.5 metres long, 2.5 metres wide and 3.3 metres high.
25. The plant site would have external lighting around the offices, plant and workshop areas.
26. Surface water run-off from the plant area would drain to the main site lagoon.

27. Soils and overburden would be stored in landscaped bunds in the north-west part of the site, out of the floodplain. There would be landscaped bunds on either side of the new access from the A4130 and running along the western site boundary south of the new exit onto the A329. There would also be an area for soil storage within the area south of the plant site reserved for stockpiling of extracted material. Topsoil bunds would be 3 metres high and subsoil bunds 5 metres high. Extracted material would be stored in a stockpile of up to 10 metres high.

Restoration

28. Restoration using inert fill would take place progressively, with restoration being commenced in each phase once extraction is complete, i.e. whilst Phase 2 was being extracted, Phase 1 would be being restored. Phase A would be the last area to be restored, once the processing plant was no longer required.
29. Following the completion of extraction, it would take a further year to complete restoration of the site. The western part of the site would be restored to agriculture with hedgerows, using imported inert fill to raise land to original levels. The eastern part of the site would be restored to nature conservation, incorporating reedbeds, marshland and floodplain grazing marsh. The applicant has proposed long term management of the restored site for 30 years.
30. It is proposed that the internal haul roads would be retained following restoration to allow agricultural access.

Traffic and Access

31. A new access into the site would be created off the A329 and a new exit would be constructed onto the A4130. Vehicles would turn left from the A329 westbound into the site. All traffic leaving the site would turn left onto the A4130 westbound to the roundabouts. Whilst the new access roads were under construction, access to the site would be from the existing agricultural entrance off the A329, using a banksman.
32. It is anticipated that there would be an average of 56 (28 in, 28 out) HGV movements per day when mineral extraction was solely occurring and an average of 66 (33 in, 33 out) HGV movements per day associated with extraction and infilling when both in occurrence. The import of fill would not generate significant additional movements, because vehicles importing fill would export aggregate. During busy periods the total could rise to a daily maximum of 100 (50 in, 50 out) HGV movements per day but conversely during slower periods they would be considerably less.
33. The site access from the A329 would be surfaced with asphalt for 30m. The road to the processing plant would be hard surfaced with imported hardcore material. An exit ramp would be constructed to raise the exit road to the A4130. The last 30m of the exit road onto the highway would be level and surfaced in asphalt.

Further Details

34. A 30-metre margin would be left undisturbed between the River Thames and the extraction area. There would be a post and wire fence 15 metres from the bank, to prevent access from the Thames Path into the extraction area.
35. The proposals would result in the loss of six trees and seven groups of trees. None of the trees to be removed are classified as a veteran tree. Most of the vegetation within the centre of the site would be lost, although a linear vegetation feature running north-south across the site would be retained. Boundary vegetation would generally be retained, except where removal is necessary for access and an area of blackthorn scrub at the southern end of the site.
36. Stripped soils would be stored in bunds. Topsoil bunds would be no higher than 3m and subsoil bunds no higher than 5m.
37. The development would generate 8-10 additional jobs onsite.
38. Hours of working would be 7am-6pm Monday to Friday, 7am – 1pm on Saturdays with no working on Sundays or Bank/Public holidays.
39. Groundwater levels would be monitored within boreholes on the site boundary during dewatering. Water levels would be compared to trigger levels within a Water Management Scheme. Monitoring would also take place in at the well at Windward House.
40. It is proposed to use straw bales to mitigate visual impacts of the Thames Path, the River Thames and the Chilterns AONB. These would be set back approximately 30 metres from the bank of the river.

Environmental Impact Assessment

41. The application is supported by an Environmental Impact Assessment (EIA) and an Environmental Statement (ES) was submitted with the application. This covers the range of potential environmental impacts of the proposal. A summary of the findings can be found in Annex 5.

PART 2 – OTHER VIEWPOINTS

42. The full text of the consultation responses can be seen on the e-planning website², using the reference MW.0115/21. These are also summarised in Annex 3 to this report.

²Click here to view application [MW.0115/21](#)

43. 351 third-party representations were received. One of these supported the application and the others were objecting or expressing concerns. The points raised are addressed in Annex 4. The main concerns raised included the impacts on the River Thames, the Thames Path, and the biodiversity and amenity value of the application site. There were concerns about noise, dust and visual impacts. Concerns were raised about whether another quarry is needed in the local area and that recycled aggregate should be used instead. There were concerns about impacts on groundwater and flooding from the infill and earthworks. There were concerns about HGV traffic and impacts on the A4130.
 44. Following the first period of consultation, the applicant was asked for further information on a range of topics including transport, biodiversity, landscape, flooding, groundwater, drainage, air quality, noise and climate change. This was provided and a further consultation was held in April and May 2022. The further information included revised phasing and application plans.
 45. Following the second period of consultation, the applicant amended the detail of the restoration proposals to address concerns raised by the MOD with regard to bird strike risk. Further plans were submitted in response to comments from the OCC Landscape Officer, detailing the relationship between the extraction limits and the soil bunds to the root protection zones for retained trees and vegetation. The applicant also liaised with the Environment Agency to overcome their flood-risk objection. Once the Environment Agency had informally indicated that they were satisfied with the flood modelling and would remove their objection, further documentation on flood modelling was formally submitted.
 46. A third period of consultation was held in March and April 2024, to seek views on all changes and additional information since the May 2022 consultation. No new issues were raised during this consultation, and the Environment Agency formally confirmed that they no longer object.
 47. A fourth period of consultation was necessary in June 2024, because it became clear that the documents submitted for the third consultation were not consistent with each other with regards to the restoration proposals. Following this consultation, the Environment Agency, MOD, and OCC Ecologist confirmed that they have no objections. There remains an objection from SODC and from the OCC Landscape Officer, as well as from local town and parish councils, the Chilterns Conservation Board and the local community.
 48. Slightly amended plans were submitted in July 2024 because the Tree Officer was concerned that plans did not accurately show the proposed standoff between the workings and retained vegetation. As the changes to the plans were very minor and did not move any bunds or stockpiles into an area of
-

greater flood risk, it was considered that these amended plans could be accepted without the need for further consultation.

PART 3 – RELEVANT PLANNING DOCUMENTS

Relevant planning documents and legislation (see Policy Annex to the committee papers)

49. In accordance with Section 70 of the Town and Country Planning Act 1990, planning applications must be decided in accordance with the Development Plan unless material considerations indicate otherwise.

Development Plan Documents

50. The Development Plan for this area comprises:

- Oxfordshire Minerals and Waste Local Plan Part 1: Core Strategy (OMWCS)
- Oxfordshire Minerals and Waste Local Plan 1996 (Saved Policies) (OMWLP)
- South Oxfordshire Local Plan 2035 (SOLP)

51. The Oxfordshire Minerals and Waste Local Plan Part 1: Core Strategy (OMWCS) was adopted in September 2017 and covers the period to 2031. The Core Strategy sets out the strategic and core policies for minerals and waste development, including a suite of development management policies.

52. The Oxfordshire Minerals and Waste Local Plan 1996 (OMWLP) was adopted in July 1996 and covered the period to 2006. Some policies of the OMWLP were replaced following adoption of the OMWCS in 2017 but 16 policies continue to be saved.

53. Cholsey Neighbourhood Plan (CNP) was made (adopted) in April 2019 and covers the whole of Cholsey Parish, including the application site.

Emerging Plans

54. Work had commenced on the OMWCS Part 2 – Site Allocations, although it was at an early stage. However, in December 2022, the Oxfordshire Minerals and Waste Local Development Scheme (13th Edition) (OMWDS) was approved at Cabinet. This sets out a process for pursuing a new Minerals and Waste Local Plan which will combine Part 1 and Part 2, and upon adoption will replace the OMWCS 2017. The emerging OMWLP is scheduled for submission in March 2025 and there are no draft policies to consider at this time. The OMWCS 2017 remains part of the Development Plan, until the adoption of a new OMWLP.

55. South Oxfordshire and Vale of White Horse District Councils are working together to prepare a new Joint Local Plan 2041. Once adopted, the Joint Local Plan 2041 will replace The South Oxfordshire Local Plan 2035. As the draft plan progresses it will begin to carry some weight in decision making, according to its stage of preparation, the extent to which there are unresolved objections to relevant policies, and the degree of consistency with policies in the National Planning Policy Framework. A 'Preferred Options' consultation took place in early 2024. The Preferred Options document includes draft policies; however, these have very limited weight due to the stage that the plan is at. It is anticipated that a full draft plan will be published for a further consultation in autumn 2024.

Relevant Development Plan Policies

56. The OMWCS policies most relevant to the consideration of this application are:

- M2 - Provision for working aggregate minerals
- M3 - Principal locations for working aggregate minerals
- M5 – Working of Aggregate Minerals
- M10 - Restoration of Mineral Workings
- W6- Landfill and other permanent deposit of waste to land
- C1 - Sustainable Development
- C2 - Climate Change
- C3 - Flooding
- C4 - Water Environment
- C5 - Local Environment, Amenity & Economy
- C6 – Agricultural Land and Soils
- C7 - Biodiversity and Geodiversity
- C8 - Landscape
- C10 - Transport
- C11 - Rights of Way

57. The SOLP policies most relevant to the consideration of this application are:

- STRAT1 – The Overall Strategy
- WAL1 – The Strategy for Wallingford
- EMP10 – Development in Rural Areas
- INF1 – Infrastructure Provision
- TRANS2 - Promoting Sustainable Transport and Accessibility
- TRANS4 - Transport Assessments, Transport Statement and Travel Plans
- TRANS5 - Consideration of Development Proposals
- TRANS7 – Development Generating New Lorry Movements
- INF4 – Water Resources
- ENV1 – Landscape and Countryside
- ENV2: Biodiversity – Designated Sites, Priority Habitats and Species
- ENV3 – Biodiversity

- ENV4 – Watercourses
- ENV5 – Green Infrastructure
- ENV6 – Historic Environment
- ENV7 – Listed Buildings
- ENV9 - Archaeology and Scheduled Monuments
- ENV12 – Pollution and Amenity
- EP1 – Air Quality
- EP4 – Flood Risk
- EP5 - Minerals Safeguarding Areas
- DES6 - Residential Amenity
- DES7- Efficient Use of Resources

58. None of the saved OMWLP are relevant to the consideration of this application. The saved policies are all site-specific and none of them apply to the area proposed in this planning application.

59. Although Neighbourhood Plans cannot cover minerals and waste development, some policies from the CNP have relevance, including:

- E1 - Landscape
- E2 – Riverside Recreation
- E3 – River Thames and Thames Path
- EP4 – Flood Risk
- E4 – Historic Environment
- T1 – Walking and cycling

Other Material Considerations

60. The current version of the National Planning Policy Framework (NPPF) was published in December 2023 and relevant sections include those on facilitating the sustainable use of minerals, meeting the challenge of climate change, flooding and coastal change, conserving and enhancing the natural environment.

61. There is a current consultation on a revised NPPF. This is a material consideration which carries very limited weight and full weight should be given to the current version of the NPPF pending the completion of the consultation period and any revisions then made to it.

62. Relevant sections of the Planning Practice Guidance (PPG) include specific advice on matters including flood risk, minerals, conserving and enhancing the historic environment, determining a planning application and natural environment.

63. The AONB Management Plans are material considerations in the decision-making process. The AONB Management Plans and position Statements for the Chilterns and North Wessex Downs are of relevance due to the location of the site within the setting of both AONBs.
64. The Chilterns AONB Management Plan (CMP) policies most relevant to the consideration of this application are:
 - DP3 – Major Development in the AONB
 - DP4 – Development in the Setting of the AONB
 - Position Statement – Development Affecting the Setting of the AONB

PART 4 – ASSESSMENT AND CONCLUSIONS

Comments of the Head of Strategic Planning

65. The NPPF sets out a presumption in favour of sustainable development, which is reflected in OMWCS policy C1. This means taking a positive approach to development and approving an application which accords with the development plan without delay, unless material considerations indicate otherwise.

Need for Mineral Extraction

66. The NPPF contains a 'presumption in favour of sustainable development,' and Section 17 specifically promotes 'facilitating the sustainable use of minerals.' It clearly sets out at paragraph 217 that when determining planning applications, local planning authorities should 'give great weight to the benefits of mineral extraction, including to the economy.'
67. Paragraph 219 of the NPPF states that minerals planning authorities (MPAs) should plan for a steady and adequate supply of aggregates by, amongst other things; maintaining landbanks of at least 7 years for sand and gravel and ensuring that large land banks bound up in very few sites do not stifle competition.
68. OMWCS policy M3 states that the principal locations for sand and gravel extraction will be within three identified strategic resource areas. This site lies within the Thames & Lower Thames Valleys –Oxford to Cholsey Strategic Resource Area and therefore this location complies with the locational strategy set out in this policy.
69. OMWCS policy M3 goes on to state that the OMWLP Part 2 will allocate specific sites for new quarries within the strategic resource areas. There is currently no Part 2 Plan to consider. In the absence of allocated sites, new sites must come forward as planning applications to maintain mineral supply.
70. OMWCS policy M2 sets out the quantities of sand and gravel needed in order to maintain landbanks of at least 7 years for sharp sand and gravel. The most

recent Local Aggregate Assessment (LAA) published in September 2023 sets out that Sharp Sand and Gravel reserves at the end of 2022 were 9.607 million tonnes. The LAA also identifies an Annual Provision Rate (APR) of 0.986 million tonnes per annum, which means that Oxfordshire had a Sharp Sand and Gravel landbank of 9.74 years at the end of 2022.

71. This is above the 7-year minimum landbank required by the NPPF. However, the policy team have considered permissions granted and estimated sales since the end of 2022 to calculate the landbank position at the end of 2023 of 7.8 years. This figure will be included in a report to the council's Cabinet in October 2024 on the Local Aggregates Assessment for the calendar year of 2023. There will have been further sales during 2024 but the information to inform the level of these is not yet available and so this is considered the best available figure for the landbank at the current time. Therefore, at the time of determining this application in 2024, the landbank has not fallen below the 7-year minimum but in the absence of any further planning permissions having been granted during 2024 and ongoing sales then it is likely to do so. The PPG on Minerals, paragraph 82, states that low landbanks may be an indicator that suitable applications should be permitted as a matter of importance. Planning and Regulation resolved to grant permission for MW.0027/22 for the Oxford Flood Alleviation Scheme in July 2024. This would involve removal of approximately 12 300 tonnes of sand and gravel from the site. However, permission has not yet been issued and this quantity of mineral would not have a significant impact on the landbank position.
72. This development would provide 0.55 million tonnes, which at the APR rate of 0.96 million tonnes would add less than one year's additional landbank. Therefore, by the end of 2024 there would still be the need for additional sand and gravel permissions to maintain the landbank above the 7-year minimum, even if this is granted planning permission.
73. Two other applications for sand and gravel extraction are currently with the County Council for determination, however, these were submitted in 2024 and are therefore at an earlier stage in the process and not yet ready for decision. There is an application for an extension to Gill Mill Quarry (MW.0057/24), which would provide an additional 1 million tonnes, and extension to Sonning Quarry (MW.0036/24) which would provide an additional 2.5 million tonnes. Should these applications be approved, the landbank position would be different. However, the landbank needs to be considered as it is at the time of making this decision, and it cannot be assumed that any other application would be approved.
74. The PPG makes it clear that there is no maximum landbank level and each application for minerals extraction must be considered on its own merits (paragraph 84). It goes on to set out reasons why an application for mineral extraction might be brought forward where an adequate landbank exists, these include:
 - Significant future increases in demand that can be forecast with reasonable certainty;

- The location of the consented reserve is inappropriately located relative to the main market areas;
 - Known constraints on the availability of consented reserves that might limit output over the plan period.
75. OMWCS policy M2 also states that the need to maintain sufficient productive capacity to enable the rates of sand and gravel provision to be realised will be taken into account. This is because if a large part of the landbank is coming from one or two sites, it may not be possible to produce the annual requirement. In Oxfordshire, a significant proportion of the sand and gravel landbank is contained in one site (Gill Mill), which has a large reserve but has a production capacity of 450 000 tonnes per annum and permission until 2040. Therefore, the ability to meet the annual requirement could become limited by production capacity. This proposal would produce around 140,000 tpa from a new site, which would assist in maintaining adequate production capacity whilst it was operational.
76. OMWCS policy M3 sets out that the sites allocated to meet the requirement in policy M2 will be located such that approximately 75% of the additional tonnage requirement is in southern Oxfordshire, to achieve an approximately equal split of production capacity between northern and southern Oxfordshire by 2021. This part of the policy relates to how sites will be allocated in Part 2 of the Oxfordshire Minerals and Waste Local Plan and is not directly relevant to making decisions on planning applications. However, this proposal would provide additional sand and gravel production capacity in the south of the county, which is in line with the aspiration driving this policy to increase the tonnage of sand and gravel from the south of Oxfordshire, in order to achieve an equal split in the future. There is also significant growth taking place in the Wallingford area, meaning that the site is well located to a source of demand for the building materials produced, although it should be noted that there is an existing, active sand and gravel quarry in very close proximity to the application site at New Barn Farm.
77. OMWCS policy M5 states that prior to the adoption of the OMWLP Part 2, permission will be granted for the working of aggregate minerals where it would contribute towards the requirement for provision in M2 provided that the location strategy in policy M3 and the requirements of policies C1-C12 are met.
78. The locational strategy in policy M3 is met, therefore, subject to assessment of the details of the proposal against policies C1-C12, the OMWCS supports mineral extraction in this area as it is within an identified strategic resource area and the mineral that it would provide would assist in maintaining Oxfordshire's landbank and a steady supply of mineral.

Location

79. As set out above, the site is in accordance with OMWCS policy M3 regarding the location of sand and gravel quarries. This is the most relevant locational policy as it directly relates to the type of development proposed.

80. SOLP policy STRAT1 sets out that the overall strategy includes supporting the role of Wallingford by maintaining the attractiveness of its town centre and supporting and enhancing the role of larger villages including Cholsey. It states that the countryside will be protected, particularly within the AONBs.
81. Concerns have been raised that this proposal would not protect the countryside, which is valued in this location for recreation. However, minerals can only be worked where they are found and this development would be temporary for approximately 6 years (5 years of extraction plus completion of restoration). The development would be phased, ensuring that only part of the site would be active at any time and the countryside would be protected in the long term through the imposition of restoration conditions. The site is not within an AONB, although it is adjacent to the boundary of one and in close proximity to another. Overall, it is considered that although SOLP policy STRAT1 does not support these proposals, there is no significant conflict either, particularly as it does not specifically seek to provide a strategy on minerals development.
82. SOLP policy EP5 confirms that minerals are a non-renewable resource, therefore, to safeguard future potential extraction, development will be directed away from identified Minerals Safeguarding Areas. This policy is not specifically relevant to the proposal but does confirm that the SOLP recognises that minerals can only be worked in certain locations.
83. SOLP policy WAL1 states that SODC will support proposals which; improve the attraction of Wallingford for visitors with emphasis on the River Thames, address air quality issues in the town centre and provide new employment opportunities. Whilst this proposal would not improve the attractiveness of Wallingford, it is not considered that it would significantly detract from it either. The application site is located some distance from the centre of Wallingford and although there would be impacts on the riverside including adjacent to the Thames Path, these would be temporary for the duration of extraction and restoration activities.
84. SOLP policy EMP10 states that proposals for sustainable economic growth in rural areas will be supported. The proposal would lead to a modest number of new jobs in the local area for a temporary period. It would also generate indirect employment in associated activities, such as mineral transportation.

Restoration and Aftercare

85. OMWCS policy M10 expects mineral sites 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. The restoration of the site to agriculture and nature conservation is considered to be appropriate at this site, which currently comprises 45% BMV agricultural land. The restoration of part of the site to nature conservation is also appropriate as it is located in a Conservation Target Area adjacent to the wildlife corridor created by the River

Thames and this would contribute towards an overall increase in biodiversity in Oxfordshire. This proposal removes the previous conflicts with this policy generated by the previous proposal to restore to a marina.

86. OMWCS policy W1 states that provision will be made to provide capacity to allow Oxfordshire to be net self-sufficient in the management of its principal waste streams. The proposal would provide additional capacity to manage inert waste which cannot be managed higher up the waste hierarchy. This is supported by policy W1.
87. OMWCS policy W2 sets targets for the diversion of waste from landfill, including a target that 25% of inert construction, demolition and excavation waste should be diverted to 'permanent deposit of inert waste other than for disposal to landfill'. The proposal would help to meet this target.
88. OMWCS policy W6 states that priority will be given to the use of inert waste that cannot be recycled as infill material to achieve satisfactory restoration of quarries. Permission will not otherwise be granted for development that involves the permanent disposal of inert waste on land unless there would be overall environmental benefit. The proposals therefore accord with this policy, providing that the waste used could not be recycled, as inert waste would be used to achieve an appropriate restoration by ensuring that best and most versatile agricultural land could be returned to productive use and that the rest of the site would be returned to appropriate nature conservation use delivering biodiversity enhancements.
89. SOLP policy ENV5 states that development should contribute towards the provision of additional green infrastructure and protect existing green infrastructure. The provision of areas to be managed for nature conservation as part of the restoration, is considered to improve the provision of green infrastructure compared to the current agricultural use, in accordance with this policy.
90. Overall, the proposals to restore the quarry using inert fill to return the site to agriculture and nature conservation use, are considered to be supported by development plan policy. Returning the site to its current landform and these uses after working would also limit the impact of the proposals on the landscape in the longer term.
91. The MOD originally expressed concern that the restoration proposals could lead to an increased risk of bird strike for air traffic from RAF Benson, as the new habitats could attract hazardous bird species. The restoration proposals were amended to remove the scrapes and the MOD has no objection, subject to goose proof fencing adjacent to the Thames and a commitment to fence the area of reed and wet woodland. This can be secured by condition. The submitted Bird Management Plan is also required to be implemented in perpetuity, a Section 106 agreement would be needed to secure this. Consultation has taken place to confirm that the amended restoration proposals are also acceptable in terms of biodiversity and flood risk.

Landscape & Visual Impacts

92. Policy C5 of the OMWCS expects proposals for minerals and waste development to demonstrate that they will not have an unacceptable adverse impact on the local environment, amenity, human health and safety and the local economy including through visual intrusion and light pollution, amongst other things.
93. Policy C8 of the OMWCS states that proposals for mineral and waste development shall demonstrate they respect and where possible enhance local landscape character. Proposals shall 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. It states that great weight will be given to conserving the landscape and scenic beauty of AONBs and high priority will be given to the enhancement of their natural beauty. Proposals for minerals development 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.
94. SOLP policy ENV1 states that the landscape and countryside will be protected from harmful development. Development will only be permitted where it protects and, where possible enhances, features that contribute to the nature and quality of landscapes, in particular: trees, hedgerows, the landscapes, waterscape, cultural heritage and user enjoyment of the River Thames, important views, areas of historic value and aesthetic features such as tranquillity, wildness, intactness, rarity and enclosure. It states that the highest level of protection will be given to the AONBs and development 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.
95. Background information on the local landscape character can be found in Oxfordshire Wildlife & Landscape Study (OWLS), SODC Landscape Character Assessment (SODC LCA) (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.
96. Under 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. The 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.

97. Under the SODC LCA, the site is located in Landscape Character Area 4 - River Thames Corridor and Landscape Type Flat floodplain pasture. It highlights in its guidelines for mitigation of mineral extraction that visual impacts should be minimised 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.
98. CNP policy E1 states that Cholsey's landscape, countryside and rural areas will be protected against inappropriate development and where possible enhanced. Great weight will be given to conserving landscape and scenic beauty within the AONB and elsewhere proposals will only be supported where it would promote small scale economic growth which promotes the conservation and enhancement of the countryside.
99. The NPPF paragraph 182 requires that great weight is given to conserving and enhancing the landscape and scenic beauty in Areas of Outstanding Natural Beauty. Paragraph 183 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.
100. The Chilterns AONB Management Plan (CMP) policy DP3 reflects the NPPF in stating that proposals for major development within the AONB will be refused unless there are exceptional circumstances and where there is a clear demonstration it is in the public interest.
101. NPPF footnote 64 sets out 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. This proposal is considered to be major development for the purposes of NPPF paragraph 183. However, the application site is not within the AONB, except for a small area covering approximately 550 m² where the boundary of the AONB diverges very slightly from following the riverbank but there is no actual mineral extraction or other development proposed in this part of the application site.. Therefore, the development is not considered to be 'major development in the AONB' and does not need to be considered against NPPF paragraph 183.
102. The application site is in the setting of the AONB. CMP policy DP4 states that in the setting of the AONB, full account should be taken of whether proposals harm the AONB. For example, development of land visible in panoramic views

from the Chilterns escarpment, or which generates traffic in or travelling across the AONB.

103. Section 245 of the Levelling Up and Regeneration Act places on local authorities a duty to further the statutory purposes of AONBs. Further guidance on how this should be applied is awaited.
104. The OCC Landscape Officer originally objected to the proposals, stating that it would introduce an industrial use associated with noise, dust, heavy machinery and HGV movements into a rural area in the setting of the Chilterns AONB. She considered that it would have an adverse effect on the local character and views and would significantly affect the views and experience of users of the Thames Path. Additional landscape information was submitted, including details of mitigation and a further consultation was held. However, the Landscape Officer maintained her objection. She stated that she believed the landscape effects and some of the visual effects during operation were underestimated in the LVIA, and that whilst the proposed mitigation would assist in reducing effects on selected receptors, they would not be fully effective in mitigating adverse effects on local landscape character, due to the site's sensitive location and the intrusive nature of the development. Due to the objection from the Landscape Officer and the significance of these comments to the decision on this application, the full comments are provided in Annex 7 to this report for ease of reference.
105. OMWCS policy C8 requires that proposals that would be within, or significantly affect, an AONB shall demonstrate that they take this into account and that they have regard to the relevant AONB Management Plan. The Landscape Officer has not described the impact on the AONB as significant, although it would be adverse. Notwithstanding this, in my view the proposal does take into account the site's location in the setting of the AONB and has had regard to the Chilterns AONB Management Plan, for example by including a 30 metre buffer between the extraction and the bank of the Thames, which is also the AONB boundary, and proposing straw bales to visually screen the operational areas from the AONB, river and Thames Path. However, it is considered that despite these mitigations the development would have adverse landscape impacts in a sensitive location which is adjacent to the River Thames and Thames Path and within the setting of the AONB. Impacts on the Thames Path are described by the Landscape Officer as significant. These impacts would be temporary for the duration of extraction and restoration and there would be no long-term landscape impacts. However, the OCC Landscape Officer considers that the 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.
106. OMWCS policy C8 requires proposals to respect the local landscape character and to include adequate and appropriate measures to mitigate adverse impacts on landscape, including careful siting, design and landscaping. The Landscape Officer's view is that the proposal is contrary to this policy, because the site is sensitive in landscape and visual terms, and

adverse landscape and visual effects would not be effectively mitigated during operation. The policy goes on to state 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 this case, the adverse impacts have not been described by the Landscape Officer as significant. The Landscape Officer has advised that in this case, compensatory measures are unlikely to be appropriate because the development would not result in residual landscape or visual effects in the long-term. Therefore, the proposal does not fully accord with OMWCS policy C8

107. The second part of OMWCS policy C8, and NPPF paragraph 182 both require great weight to be given to conserving the landscape and scenic beauty of AONBs. This development would lead to significant effects on the site's landscape character, creating a tension with OMWCS policy C8 and the Chilterns AONB Management Plan policy DP4 due to the harm they would cause to the setting of the AONB in this location.
108. The proposal is also considered to not fully accord with SOLP policy ENV1 because it would not conserve the character and natural beauty of the AONB, and would not protect features contributing to the quality of the landscape, or the enjoyment of the River Thames, or the tranquillity of the area.
109. Neighbourhood plans cannot cover minerals development; however the policies may have some relevance. The proposals are not supported by CNP policy E1 as they would lead to adverse impacts on Cholsey's landscape and countryside.
110. The application originally proposed external lighting which would remain on all night around the site offices, for security reasons. Through further discussion with the applicant, they have accepted that this is not necessary and have agreed that they would accept a condition restricting the use of external lighting to reduce potential impacts on the local landscape and ecology. It is considered that such a condition would serve to mitigate one element of the potential landscape impacts during the quarrying phase.
111. The application originally proposed to retain the quarry haul road in the landscape post-restoration, for agricultural purposes. This element would represent a continued impact on the landscape following the end of the active quarrying phase. Following further discussion, the applicant has agreed that they would not need the haul road to be retained. Instead, they propose to remove the haul road and retain a short section of farm access track set between two hedgerows to provide the landowner with access to riverside grazing land in the long term. This would be the re-instatement of an existing feature, with additional landscape planting benefits. On that basis, I am satisfied that the most significant landscape impacts would be temporary for a relatively short time period.

Landscape Mitigation

112. Notwithstanding, the landscape objection, the Landscape Officer has requested a number of landscape conditions be added to any permission that may be granted. It is proposed to retain boundary vegetation as far as possible, protect retained trees through fenced construction exclusion zones and to restore lost canopy and vegetation over time, through the implementation of the restoration plan. This is considered to be an acceptable approach, subject to conditions to secure the replacement planting and tree root protection zones.
113. The Landscape Officer has reservations about the proposed use of straw bales to mitigate visual impacts on the River Thames, Thames Path and AONB, although the applicant has declined to remove these from the proposals, stating that they are commonly accepted and appropriate in the location given their flexibility to be moved as the works progress and agricultural appearance. If permission is granted, a condition should be imposed for full details of the proposed boundary treatment. If straw bales are to be used this should include location, height, size of individual bales, method of securing and replacement timeframe.

River Thames

114. SOLP policy ENV1 states that development will only be permitted where it protects and, where possible enhances the landscapes, waterscape, cultural heritage and user enjoyment of the River Thames. SOLP policy ENV4 states that development adjacent to a watercourse must protect and where possible enhance the function and setting of the watercourse. There should be a minimum buffer of 10 metres.
115. OMWCS policy C4 states the River Thames should be adequately protected from unacceptable adverse impacts.
116. The proposals would have an adverse impact on the section of the River Thames and the Thames Path National Trail that run adjacent to the site. However, these impacts would be temporary. Mineral can only be worked where it is found, and sand and gravel is found in river valleys. Although these policies do not support the proposals, given the temporary nature of the impacts and the potential to mitigate impacts through conditions, it is not considered that there is a significant conflict.

Landscape Conclusions

117. Overall, taking into account the objection from the Landscape Officer, the proposals are considered not to accord with landscape policies, including OMWCS policy C8, SOLP policy ENV1 and CNP policy E1, because they would not respect or enhance the local landscape character and would adversely affect the setting of the AONB and River Thames. These policies, and the NPPF, require great weight to be given to conserving the landscape of the AONB and whilst this site is not within the boundary other than the very small element as set out above, it is within the setting.

118. However, the most significant landscape impacts would take place during the operational period and during the implementation of restoration, which is a relatively short timeframe. The impacts on the landscape must be balanced with all other relevant policy considerations, including the need for the mineral.

Biodiversity

119. Policies C7 and M10 of the OMWCS taken together expect mineral and waste development, including the restoration of mineral workings, to conserve biodiversity and, where possible, deliver biodiversity net gain. OMWCS policy C7 also states that long term management arrangements for restored sites shall be clearly set out and included in proposals, which should include a commitment to ecological monitoring and remediation.
120. SOLP policy ENV2 states that development likely to result in the loss, deterioration or harm to priority habitats and species, Conservation Target Areas, important hedgerows or ancient woodland or veteran trees, will only be permitted if the need for the development in the location outweighs the adverse effect.
121. SOLP policy ENV3 states that development that will conserve, restore and enhance biodiversity will be supported. There should be no net loss of biodiversity and there should be a net gain where possible.
122. Whilst the development would lead to the removal of habitat in the short term, the site is not especially sensitive in terms of ecology and the restoration proposals would increase the biodiversity value of the site. The impacts of the development on ecology could be mitigated through the use of conditions to ensure a phased approach and to address any specific impact on species.
123. Following the submission of further information as requested, there has been no objection from the OCC Ecology Officer. There were queries initially about the application of the Biodiversity Net Gain (BNG) metric, however the Ecologist was ultimately satisfied that, whilst the site is not subject to mandatory BNG as the application was submitted in 2021, the proposals should deliver biodiversity net gain in excess of 10%. Conditions can be used to address protected species.
124. A number of representations have expressed concern about the impacts on wildlife. Although there would be a short-term impact on habitats and species, the proposals are considered to be acceptable in terms of ecological impact as there would be long-term benefits following the restoration of the site, and conditions could be applied to protect wildlife during the operational phase. There would need to be a condition for a Habitat Monitoring and Management Plan for a period of 30 years to ensure that the benefits for ecology were delivered as planned with the provision of an associated monitoring fee through a section 106 Legal Agreement.

125. Due to the length of time between the submission and determination of this application, the ecological surveys submitted as part of the ES are more than three years old at the time of making a decision. However, the applicant's ecologist has provided a letter, informed by a site walkover, confirming that there has been no change in the status of habitats since the previous ecological appraisal. The OCC Ecologist is satisfied with this, subject to pre-commencement conditions for updated surveys.
126. Subject to the conditions recommended by the Ecology Officer and a legal agreement for long term management of the site for 30 years post-restoration, the proposals are considered to be in accordance with OMWCS policies C7 and M10 and SOLP policy ENV2 and ENV3.

Trees

127. SOLP policy ENV2 specifically protects important hedgerows, ancient woodland or veteran trees. An Arboricultural Report has been submitted with the application which identifies which trees would need to be removed and confirms that these are lower quality. It states that higher quality trees adjacent to the works could be retained with appropriate mitigation measures. It concludes that the implementation of the restoration plan would enhance lost canopy and vegetation cover over time.
128. SODC and the OCC Tree Officers expressed concerns that the Arboricultural Report wasn't consistent with the phasing plans. Updated information was provided to clarify the proposed root protection zones. The OCC Arboricultural Officer has confirmed that the information demonstrates that sufficient distance can be maintained between the trees to be retained and the limits of excavation and bunds. However, updated phasing plans are still required due to some discrepancies in the drawings submitted regarding the exact location of bunds. This could be secured by condition. It is considered that the proposals are acceptable in terms of impacts on trees and hedgerows, subject to conditions to ensure the proposed arboricultural protection measures are implemented.

Transport

129. Policy C5 of the OMWCS expects proposals for minerals and waste development to demonstrate that they will not have an unacceptable adverse impact on the local environment, amenity, and economy including through traffic effects and mud on the road amongst other things. OMWCS policy C10 states that minerals and waste development will be expected to make provision for safe and suitable access to the advisory lorry routes shown on the Oxfordshire Lorry Route Maps.
130. SOLP policy TRANS2 states that SODC will ensure that the impacts of new development on the strategic and local road network are adequately mitigated. SOLP policy TRANS5 states that proposals for all types of development will provide for a safe and convenient access for all users to the highway network

and be served by an adequate road network which can accommodate traffic without creating traffic hazards or damage to the environment.

131. SOLP policy TRANS4 states that applications should be accompanied by a Transport Assessment or Transport Statement, where there would be significant transport implications. It also sets out what these should include. Appropriate provision for works and/or contributions will be required towards providing an adequate level of accessibility.
132. SOLP policy TRANS7 states that proposals leading to significant increases in lorry movements should only be permitted in locations where the increase can be accommodated on the surrounding road network, opportunities for sustainable transport have been maximised and the development does not result in adverse environmental effects on the surrounding area.
133. SOLP policy INF1 states that new development must be served and supported by appropriate infrastructure. Development will also need to take account of existing infrastructure running across development sites.
134. CNP policy T1 states that where appropriate new developments should connect to, and where possible, improve Cholsey's walking and cycling network. Concerns have been raised that this proposal would have adverse impacts on walking routes between Cholsey and Wallingford. However, the impacts would be temporary, and they would be limited. Existing rights of way, including the Thames Path would remain open at all times and there is no formal public access over the wide site in any case.
135. Transport Development Management (TDM) originally objected to the proposals, requesting further assessment work of the proposed new junction and a revised highway impact assessment using more recent survey data. This further information was provided and TDM removed their objection subject to a Traffic Regulation Order to ensure that HGVs do not turn right into our right out of the site, and also conditions to ensure the new access and vision splays are provided as proposed, gates are set back from the highway and a Construction Traffic Management Plan (CTMP) is provided, approved and implemented.
136. The information submitted demonstrates that the proposed new access meets the required technical specifications and would not cause an issue in terms of highway safety. The Transport Assessment shows that the proposed additional HGV movements per day would have less than a 2% impact on the local highway network, which is acceptable to the TDM officer. Although representations have been made expressing concern about traffic impacts, the site is considered to have good access on the strategic road network, with a direct access from and exit to A-roads.
137. The development is considered to be in accordance with relevant transport policies including OMWCS policy C5, SOLP policy TRANS2, TRANS4, TRANS5, TRANS7 and INF1.

Rights of Way

138. OMWCS policy C11 states that the integrity and amenity of the rights of way network shall be maintained and improvements and enhancements to the rights of way network will be encouraged. Where appropriate, provision should be made for this in restoration schemes.
139. CNP policy E2 states that proposals which improve opportunities for residents and visitors to informally enjoy Cholsey's riverside location, or which improve facilities for river-based sport or recreation, and are compatible with CNP E1 and CNP E3 will be supported. CNP policy E3 states that development proposals should respect the landscape, waterscape, cultural heritage and user enjoyment of the River Thames, its tributaries, floodplains, the Ridgeway and the Thames Path.
140. There has been no objection from the Rights of Way team, subject to provision for the periodic inspection and replacement of the straw bales which would provide a visual buffer along the public footpath. This can be secured by planning condition.
141. It is acknowledged that the presence of a quarry could detract from enjoyment of the riverside in this location, and this has given rise to local concern. However, the impacts would be temporary for the five-year duration of extraction and restoration and would be mitigated through phasing and screening. Once the site is restored there would not be any long-term impacts on rights of way. The development is not considered to conflict with OMWCS policy C11 or CNP policies E2 or E3.

Flooding and Drainage

142. OMWCS policy C3 states that minerals and waste development should take place in the areas of lowest flood risk. Where development takes place in an area of identified flood risk this should only be where alternative locations in areas of lower flood risk have been explored and discounted and where a Flood Risk Assessment (FRA) is able to demonstrate that the risk of flooding is not increased from any source. It goes on to state that opportunities should be taken to increase flood storage capacity in the floodplain, particularly through quarry restoration.
143. SOLP policy INF4 states that all development proposals must demonstrate that there is or will be adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the whole development.
144. SOLP policy EP4 states that the risk and impact of flooding will be minimised through directing new development to areas of lowest flood probability, ensuring effective management of sources of flood risk, ensuring development does not increase the risk of flooding elsewhere and ensuring wider environmental benefits in relation to flood risk. The suitability of development

proposed in Flood Zones will be strictly assessed using the 'Sequential Test' and a sequential approach should be used at site level.

145. CNP policy STRAT1 states that part of the overall neighbourhood plan strategy is to ensure that development does not worsen the extent and frequency of flooding events in the village by siting new development away from areas liable to flood.
146. The submitted Flood Risk Assessment includes a number of mitigation measures, including locating stockpiles, bunds, buildings and the weighbridge in Flood Zone 1, a 30 metre stand off from the River Thames and phased excavation and backfill.
147. The Environment Agency initially objected to this application on the grounds that the flood modelling did not consider climate change allowances and insufficient information had been provided to demonstrate that risks to groundwater resources from which supplies of potable water are obtained, could be managed safely. Further information was provided, however the objection related to modelling was maintained as various issues were found with the model when files were provided for review. They also had a new in-principle objection to the proposed use of inert fill as restoration material, in flood zone 3. Further information was submitted and a concern was raised about a potential increase in flood risk off-site, arising from the modelling work.
148. Ultimately, the Environment Agency removed all their objections, following the provision of further information and amendments to the detailed phasing plan. The in-principle objection was removed as the applicant confirmed that a recovery, rather than a landfill permit was being sought for the restoration activity, and that this activity would be necessary to progressively restore the site. The technical objection relating to flood modelling was also removed once further information adequately demonstrated that there would be no significant increase in off-site flood risk. Conditions were requested to ensure only inert waste is used in restoration, ensure the mitigation measures in the FRA are followed, to require a detailed restoration plan, a monitoring and maintenance plan for groundwater and surface water, a groundwater monitoring plan for the deposit of waste, and a Construction Environmental Management Plan (CEMP).
149. There has been no objection from the Lead Local Flood Authority, subject to a condition for details of the installed drainage scheme to be submitted.
150. On the basis of the information submitted and the advice of consultees with the relevant technical expertise, it is considered that the development would not increase the risk of flooding. The development is considered to be in accordance with relevant policies relating to flood risk, including OMWCS policy C3, SOLP policies INF4, EP4 and CNP policy STRAT1.

Sequential Test

151. PPG 066 Reference ID: 7-066-20140306 Table 2 classifies sand and gravel working as 'water compatible' and Table 3 confirms that this means that it is appropriate in all flood zones, including the functional floodplain.
152. Regardless of the water compatible classification of sand and gravel extraction, the PPG Notes to Table 3 confirm that the sequential test should be applied. OMWCS policy C3 states that mineral development will, wherever possible, take place in areas with the lowest probability of flooding. Where development takes place in an area of identified flood risk this should only be where alternative locations in areas of lower flood risk have been explored and discounted using the sequential test and where a flood risk assessment is able to demonstrate that the risk of flooding is not increased.
153. As set out above, the FRA demonstrates that the risk of flooding is not increased. However, the OMWCS requires that a Sequential Test is undertaken by the County Council to assess whether there are other sites reasonably available for the extraction of sand and gravel in an area of less flood risk. This is contained in Annex 8 to this report and it concludes that the application site fails the sequential test, as there is a potential alternative site in an area of lesser flood risk at Gill Mill Quarry.
154. The proposal is therefore not in complete accordance with OMWCS policy C3, which states that where development takes place in an area of identified flood risk this should only be where alternative locations in areas of lower flood risk have been explored and discounted. However, it should be noted that there is currently a Natural England objection to the application at Gill Mill Quarry due to proximity to an SSSI and it is not clear whether the site is suitable for extraction. Even if permission was granted for the Gill Mill extension which would add one million tonnes of sand and gravel to the landbank, there would still be the need for additional permissions for sand and gravel extraction over the plan period. In addition, a site-specific flood risk assessment has demonstrated that there would be no increased risk of flooding as a result of this development. There have been no objections from the Environment Agency or Lead Local Flood Authority following the provision of a site specific Flood Risk Assessment. Therefore, the conflict with OMWCS policy C3 needs to be weighed against the compliance with other relevant policies and the need for the development.
155. SOLP policy EP4 also requires that a sequential approach is taken to flood risk at a site level. The PPG Table 3 classifies sand and gravel processing as 'less vulnerable' rather than 'water compatible' and states 'less vulnerable' development should not be permitted in the functional floodplain (3b). The proposals have been designed such that the temporary plant and stockpiles would be located in flood zone 2, an area of lower flood risk. Development within the areas of highest flood risk would be limited to mineral extraction, which is classed as 'water compatible' development by the PPG. Therefore, the sequential test is passed within the site.

Groundwater and Water Quality

156. OMWCS policy C4 states that proposals must demonstrate that there would be no unacceptable adverse impact or risk to the quantity or quality of surface or groundwater, the quantity or quality of water obtained through abstraction or the flow of groundwater through the site.
157. The Environment Agency initially objected to this application on the basis that it could threaten potable water supplies causing insufficient quantities of water. They identified that the site is located upon a principal and secondary A aquifer, and there is a licensed domestic abstraction 50 metres to the south. However, this objection was removed following the submission of a risk assessment demonstrating that the risks could be safely managed.
158. The dewatering operations have the potential to impact groundwater levels in the area. However, mitigation measures are proposed, including the monitoring of water levels in boreholes around the site and in the private well at Windward House and comparison of these levels with trigger levels in a Water Management Plan, to be submitted pursuant to a planning condition. A clay filled trench is also proposed on the southern boundary of phase 3.
159. The risk of water quality being adversely affected by the inert waste infill is considered to be low as the fill material would be subject to strict acceptable criteria. The applicant would also require an Environmental Permit from the Environment Agency for the deposit of waste which would be the pollution control regime.
160. The proposal is considered to be in accordance with OMWCS policy C4.

Amenity

161. OMWCS policy C5 states that proposals for minerals and waste development shall demonstrate that they will not have an unacceptable adverse impact on the local environment, health and safety, residential amenity or the local economy, including from noise, dust, visual intrusion, light pollution, traffic, air quality, contamination or cumulative effects.
162. SOLP policy DES6 states that development proposals should demonstrate that they will not result in significant adverse impacts on the amenity of neighbouring uses, including through noise, dust and external lighting.
163. SOLP policy ENV12 states that development should be designed to ensure that it will not result in significant adverse impacts on human health, the environment or amenity of neighbouring uses. The consideration of the merits of development proposals will be balanced against the adverse impact on human health, the natural environment and local amenity, including from noise, dust, odour, light, air pollution, land instability or any other relevant types of pollution.

164. SOLP policy EP1 states that developments should include measures to minimise air pollution and mitigation should be offered where needed.
165. CNP policy STRAT1 states that part of the overall strategy of the plan is to improve the health and wellbeing of the community.
166. The noise assessment provided with the application recommends that a detailed noise monitoring scheme is required by pre-commencement condition, and routine noise monitoring should be undertaken throughout the life of the development in accordance with the approved scheme. There has been no objection from the Environmental Health Officer in relation to noise, and it is considered that conditions can be used to ensure that noise limits are complied with, therefore protecting nearby noise-sensitive receptors. Conditions would also be used to restrict hours of working.
167. Regarding dust, there has been no objection from the Environmental Health Officer or the OCC Public Health team. A condition should be used to require the submission and implementation of a comprehensive dust management plan including details of air quality monitoring and mitigation measures.
168. The applicant originally proposed that external lighting around the offices would be on during all hours of darkness. It is not clear why this is necessary and given the sensitivity of the landscape in this area, as well as the potential impact on ecology, this may not be acceptable. Therefore, a condition should be added to control the specifications and timing of external lighting, as this has the potential to be a nuisance, impact landscape in the AONB setting and disturb wildlife. The applicant has agreed to this. Subject to adequate controls, it is considered that the limited external lighting necessary for the development is capable of being acceptable.
169. Overall, it is considered that the proposals would not give rise to an unacceptable impact on amenity. There has been no objection from the Environmental Health or the Public Health teams. The site is not in particularly close proximity to residential properties, and conditions could be used to ensure appropriate mitigation measures are applied.
170. Subject to conditions, the proposal is considered to be in accordance with OMWCS policy C5, SOLP policies DES6, ENV12, EP1 and STRAT1

Historic Environment

171. NPPF paragraph 195 states that historic assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraph 205 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Paragraph 206 states that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. Paragraph 207 states that where a development would lead to substantial harm to a designated heritage asset, consent should be refused. Paragraph 208 states that where the harm would

be less than substantial, the harm should be weighed against the public benefits of the proposal.

172. OMWCS policy C9 states that proposals for minerals and waste development will not be permitted unless it is demonstrated that they would not have an unacceptable adverse impact on the historic environment. Proposals for mineral working shall wherever possible demonstrate how the development will make an appropriate contribution to the conservation and enhancement of the historic environment.
173. SOLP policy ENV6 states that development should be sensitively designed and should not cause harm to the historic environment. SOLP policy ENV7 protects listed buildings and their settings. SOLP policy ENV9 states that development proposals must have regard to any archaeological remains. Relevant assessments must be submitted. The effect of a development proposal on the significance of the remains, either directly or indirectly, will be taken into account in determining the application.
174. CNP policy E4 states that proposals which would affect a listed building or its setting should identify the special interest, character, appearance, importance and significance of the heritage asset and contribution to those of the setting. Proposals should be well designed to conserve, or enhance and respect those attributes.
175. The site is within an area of considerable archaeological interest and the geophysical survey and trenched evaluation already undertaken have recorded archaeological features. There has been no objection from the archaeology team, subject to conditions for the approval of a Written Scheme of Investigation and the implementation of a staged programme of archaeological investigation. This will ensure that the archaeological features are properly recorded and analysed. In terms of archaeology, the proposal is considered to be in accordance with relevant heritage policies.
176. Historic England have not objected to the proposals, but they have expressed concerns about its proximity to the former Carmel College, Mongewell Park, particularly in relation to the grade II* listed boathouse and grade II listed church. They originally stated that it would be premature to grant planning permission for this development until the Part 2 Plan (Site Allocations Document) has been adopted and sites allocated.
177. The NPPF paragraph 49 states that arguments that an application is premature is unlikely to justify a refusal of planning permission other than in the limited circumstances where both a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process; and b) the emerging plan is at an advanced stage. Neither of these circumstances apply in this case and therefore, the application should not be considered to be premature.
178. Heritage impacts are considered as part of the LVIA submitted to support the application. This assesses various impacts on various assets. Overall, the

report concludes that the development would not physically alter the cultural value of historic assets or indirectly significantly affect the visual setting of identified assets. A minor adverse impact is predicted for the boathouse and a negligible impact at the church, which is set behind vegetation.

179. There would be a 30 metre stand-off between the development and the River Thames, which would mitigate impacts on buildings on the other side of the river. It is also proposed to use straw bales to screen the quarry from the Thames Path, the river and the AONB boundary. This visual screen between the workings and the listed buildings, although it could potentially itself also have a minor impact on the setting of the assets.
180. The NPPF distinguishes between proposals which have or would cause substantial harm to the significance of a heritage asset and those which would cause less than substantial harm. Planning Practice Guidance states that substantial harm is a high test, so it may not arise in many cases. Case law (Bedford Borough Council and the SoS for Communities and Local Government and Nuon UK Ltd) indicates that substantial harm requires such a serious impact on the significance of a heritage asset that its significance is lost or very much reduced. Therefore, I consider that the harm to listed buildings on the other side of the river would be less than substantial at the lower end particularly considering that the impacts would largely be temporary for a relatively short period.
181. NPPF paragraph 208 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
182. Historic England consider that the proposed restoration plan is 'markedly improved' from the previous proposal for a marina. The impacts of this development on the heritage assets at the Carmel College site would be temporary. There would be public benefits from the provision of mineral needed for building materials at a site close to the demand for these materials. This reduces transportation distances and therefore minimises the environmental impact of transportation. The provision of building materials to supply building sites also facilitates the provision of housing and economic growth.
183. Historic England's initial response states that the harm to the boathouse and church cannot be considered to be outweighed by public benefits as the application is premature. However, following the guidance in the NPPF, the application cannot be considered to be premature. It is noted that Historic England have not actually objected to the proposal and there has been no specific objection from a heritage officer at the District Council, only a general comment that SODC support Historic England's comments. The Environmental Statement assesses impacts on designated heritage assets and concludes that no significant impacts are likely. In my view the limited and temporary harm to the significance of listed buildings at the Carmel College site would be outweighed by the public benefits of the proposal.

184. There is also a requirement to take into account section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess. In my view, the proposal would preserve the listed buildings in close proximity and their settings as there would be no direct impacts on the buildings themselves and no change to the setting following the completion of restoration.
185. Overall, the development is considered to be in accordance with relevant development plan policies protecting heritage assets and archaeology, including OMWCS policy C9, SOLP policies ENV6, ENV7 and ENV9 and CNP policy E4.

Agriculture and Soils

186. OMWCS policy C6 states that proposals must take into account the presence of best and most versatile agricultural land. Provision should be made for the management of soils to maintain agricultural land quality and soil quality. Significant development leading to the permanent loss of best and most versatile agricultural land will only be permitted where it can be shown that there is a need for the development which cannot reasonably be met using lower grade land and where all options for reinstatement without loss of quality have been considered taking into account other relevant considerations.
187. The proposal would restore the site to agriculture and nature conservation use. This is considered to be an appropriate afteruse in this location and it would preserve the existing BMV agricultural land. There has been no objection from Natural England with regards to soil resources. Conditions should be used to ensure that soils are stored appropriately such as to ensure a high-quality agricultural restoration where required within the site. Subject to those conditions, the development is considered to be in accordance with OMWCS policy C6.

Climate Change

188. The planning system has an important role to play in meeting the challenge of climate change. Paragraph 159 of the NPPF makes this explicit, and states that development should be planned for in ways that:
- (a) Avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
 - (b) Can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the government's policy for national technical standards.

189. OMWCS policy C2 states that minerals and waste proposals, including restoration proposals, should take account of climate change for the lifetime of the development. Applications for development should adopt a low carbon approach and measures should be considered to minimise greenhouse gas emissions and provide flexibility for future adaptation to the impacts of climate change.
190. The application did not originally address climate change mitigation. However, further information was provided stating that the development is located close to the market for processed sand and gravel and would therefore reduce HGV distances and therefore emissions compared to importing this material from quarries further away. The restoration proposals include tree and hedgerow planting which would make a modest contribution to mitigating climate change. The drainage systems have been designed to ensure there is no increase in run-off and therefore would not exacerbate climate change driven flood events.
191. SOLP policy DES7 states that new development must make provision for the effective use and protection of natural resources, for example through making efficient use of water, minimising waste and avoiding the development of best and most versatile agricultural land.
192. Overall, the development is considered to be in accordance with policies related to climate change and natural resources, including OMWCS policies C1 and C2 and SOLP policy DES7.

Sustainable Development

193. OMWCS policy C1 reflects the presumption in favour of sustainable development contained in the NPPF. It states that applications in accordance with policies in the plan will be approved unless material considerations indicate otherwise. This application is generally supported by development plan policies, however, there would be temporary harm to a sensitive landscape, which is not supported by relevant landscape policies. It also does not pass the sequential test, as required by OMWCS policy C3. This must be weighed up against the need for the mineral and the fact that the impacts would be temporary for a relatively short period.

Weighing Up the Need for Mineral with Landscape Impacts

194. This application has been before the County Council for three years and in this time the applicant has worked to address various issues raised by consultees. However, it has not been possible to overcome the landscape objection. The Landscape Officer has objected to this application due to the site's sensitive location adjacent to the Chilterns AONB and Thames Path and the introduction of noise, heavy machinery and HGV movements to the site. Although further information was submitted, it has not addressed these

concerns such that the objection can be removed. The Landscape Officer has advised that further mitigation would not make the development acceptable in landscape terms, because of the nature of the development and the sensitive location. Therefore, no further mitigation or further information can be requested that would fully address this fundamental objection.

195. The proposal does not fully accord with OMWCS policy C8, because soil stripping, mineral extraction, the presence of plant, machinery and stockpiles would have an impact on the landscape in this location. Because the site is adjacent to the River Thames and in the setting of the AONB, it is considered to be particularly sensitive. .
196. The impacts on the landscape need to be weighed against other policy considerations, including the need for the mineral. At present, the council's estimate of the landbank is above the seven-year minimum required by the NPPF but it is likely to drop below it assuming ongoing sales during 2024 and given that no other planning permissions for additional sand and gravel reserves have been granted so far in 2024. It should also be taken into account that most impacts would be limited in duration to the 6-year period of extraction and restoration. In the long term, the restored site would be returned to agriculture and therefore landscape impacts would not be significant.
197. The relatively small contribution that this site would make to the landbank (less than one year's additional supply), may be a relevant consideration in balancing the benefits of the proposal with the impacts on the landscape. However, the relatively small amount of mineral is reflected in the relatively short extraction period of five years, following which the site would be restored and impacts would reduce significantly.
198. OMWCS policy C8 does not set out the circumstances when a proposal should be refused due to impacts on the landscape. It 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. The Landscaper Officer has not requested any further compensatory environmental enhancements; however, the development would result in a net gain in biodiversity.
199. Overall, in my view the level of the landbank of sharp sand and gravel reserves of 7.8 years indicates a need for additional reserves of sharp sand and gravel to be granted planning permission which outweighs the landscape impacts of the development. Although the site is in a sensitive location in the setting of the Chilterns CNL/AONB, the impacts would be temporary due to the proposal to restore the site to agriculture. Whilst there would be impacts on recreational visitors to the River Thames, including walkers on the Thames Path, mineral can only be worked where it is found and sand and gravel is found in river valleys. The quarrying would be phased and would only be taking place in close proximity to the Thames Path for part of the operational phase. The applicant has amended the proposal where possible to reduce landscape and visual impacts, including agreeing to conditions to remove the

haul road as part of the restoration and ensure external lighting is time-controlled. The relevant policy in the OMWCS (policy C8) does not set out circumstances where applications should be refused on landscape grounds alone. Therefore, despite the impacts on the landscape, overall, the development is considered to be acceptable subject to conditions.

Sequential Test Conclusions

200. The site is located in an area at risk of flooding and fails the sequential test as there may be an alternative location for sand and gravel extraction within an area of lesser flood risk. However, there is no certainty that this alternative location would be granted planning permission and a site specific flood risk assessment has demonstrated that the development would not lead to an increased risk of flooding. Therefore, the conflict with policy is considered to be outweighed by the current need for additional reserves of sand and gravel.

Financial Implications

201. Not applicable as the financial interests of the County Council are not relevant to the determination of planning applications.

Legal Implications

202. Legal comments and advice have been incorporated into the report.

Equality & Inclusion Implications

203. In accordance with Section 149 of the Equality Act 2010, in considering this proposal, due regard has been had to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
204. It is not however considered that any issues with regard thereto are raised in relation to consideration of this application.

Conclusions

205. The application site is in a relatively sensitive location, adjacent to the River Thames, Thames Path, AONB and a number of listed buildings. Objections have been received from the District Council, Parish and Town Councils,

Landscape Officer and AONB Board. Historic England have expressed concern. It is within an area at risk of flooding and therefore fails the sequential test, although there has been no objection from technical consultees on flood risk grounds.

206. The development would be temporary, and impacts would be limited to the duration of extraction and restoration activities. It is not considered that there would be any long-term impacts beyond the 6-year temporary period proposed. Conditions could be used to mitigate the impacts during the operational phase.
207. The impacts of the development, particularly on landscape, recreation and heritage, need to be balanced against the need for the mineral. In my view, the need for the mineral outweighs the concerns, particularly in view of the temporary nature of the development for a relatively short duration of six years and the current landbank position.
208. There is a fine balance between the need for the mineral that this proposal would supply, and the impacts that it would have on the local environment. However, in view of the temporary nature of those impacts and the location of the site within the Strategic Resource Area, overall, it is considered that the need for the development outweighs the impacts. Therefore, it is recommended that planning permission is granted, subject to the conditions listed in Annex 1 and legal agreements to cover the points in Annex 2.

RECOMMENDATION

It is RECOMMENDED that subject to a Traffic Regulation Order to prohibit right-turn movements into the site from the A329 Reading Road and right-turn movements out of the site onto the A4130 Nosworthy Way first being made and a S.106 legal agreement to cover the matters in Annex 2, planning permission for MW.0115/21 be approved subject to conditions to be determined by the Head of Strategic Planning, to include those set out in Annex 1.

**Nicholas Perrins
Head of Strategic Planning**

Annexes:

- Annex 1: Conditions
- Annex 2: Section 106 Heads of Terms
- Annex 3: Consultation Responses
- Annex 4: Representations
- Annex 5: Environmental Impact Assessment
- Annex 6: European Protected Species
- Annex 7: Landscape Officer comments
- Annex 8: Sequential Test

Annex 1 – Conditions

1. Complete accordance with plans and particulars.
2. Commencement within three years.
3. Temporary consent – extraction completed within 5 years of commencement and restoration completed within 1 year of cessation of extraction.
4. No working outside approved hours (7am-6pm Monday to Friday, 7am – 1pm on Saturdays with no working on Sundays or Bank/Public holidays).
5. Restoration in accordance with plans and removal of all associated plant and development.
6. 5-year aftercare, in accordance with an aftercare scheme to be submitted and approved.
7. Screening and soil storage bunds to be constructed and maintained in accordance with plans to be submitted and approved prior to commencement.
8. Soil screening bunds in situ for more than 6 months to be grassed and subject to weed control.
9. Submission, approval and implementation of full details of buildings and structures within the plant site.
10. Implementation of approved final restoration contours.
11. Progressive working and restoration, in accordance with plans.
12. Submission, approval and implementation of a Water Management Plan to protect groundwater levels at the private well at Windward House.
13. Recovery of inert waste only, no landfill.
14. Development to be carried out in accordance with approved FRA.
15. Submission, approval and implementation of detailed restoration plan .
16. Submission, approval and implementation of monitoring and maintenance plan in respect of groundwater and surface water including timetable of monitoring and submission of reports.
17. Submission, approval and implementation of monitoring plan in respect of deposition of waste including a timetable of monitoring and submission of reports for approval which shall include any necessary contingency action.
18. Groundwater monitoring at the perimeter of the site.
19. Provision of site wide drainage scheme and submission of details for Lead Local Flood Authority register.
20. Submission, approval and implementation of a Construction Environmental Management Plan (CEMP).
21. Submission, approval and implementation of Habitat Monitoring and Management Plan to deliver at least 10% BNG for a period of 30 years.
22. Submission, approval and implementation of a Landscape Monitoring Plan.
23. Written scheme of archaeological investigation.
24. Staged programme of archaeological investigation.
25. Maximum noise limits at closest dwellings, as specified in noise assessment.
26. Noise management plan, including details of monitoring, submission of noise monitoring data for inspection, mitigation measures and details of weather conditions during which specified noisy activities would stop.
27. No reversing beepers other than those which use white noise.
28. Servicing and maintenance of plant and machinery.

29. Submission, approval and implementation of a detailed dust management plan covering operational and non-operational hours and incorporating proposed monitoring, mitigation and details of weather conditions that would cause working to stop.
30. Submission and approval of external lighting scheme, compliance with approved scheme.
31. Establishment and maintenance of straw bale barrier to screen the footpath, details to be submitted and approved prior to commencement, including provision for regular inspection and replacement of bales.
32. Management of soils during the aftercare period.
33. Maximum height of temporary storage mounds and mineral stockpiles.
34. Submission and approval of updated protected species surveys prior to commencement of development and commencement of working in a new phase, a revised ecological mitigation scheme should the surveys indicate changes.
35. Submission, approval and implementation of a scheme for bird and bat boxes, including kestrel and/or barn owl. Provision of boxes in accordance with approved scheme.
36. Submission, approval and implementation of a reptile mitigation scheme.
37. Submission, approval and implementation of an appropriate method for felling of silver birch with low bat roost potential.
38. Replacement tree planting to be implemented as proposed, details of bund layout and heights at each stage to be submitted and approved
39. No mud, dust or debris to be deposited on the highway. Submission, approval and implementation of measures for keeping the public highway free of mud, dust and debris.
40. Formation of site access and egress prior to any other commencement of development.
41. Vision splays to be provided and maintained.
42. Any gates to be set back a minimum of 18 metres from carriageway and to open inwards.
43. Submission, approval and implementation of a scheme for the protection of retained trees, including an updated Arboricultural Protection Plan and Arboricultural Method Statement (AMS). Limits of extraction and positioning of boundary bunds and soil mounds in accordance with this.
44. Submission, approval and implementation of details of boundary treatment for the eastern site boundary with the Thames Path.
45. Details of a liaison meeting to be set up and run by the operator, to be submitted for approval and implemented.

Compliance with National Planning Policy Framework

In accordance with paragraph 38 of the NPPF Oxfordshire County Council takes a positive and creative approach and to this end seeks to work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. We seek to approve applications for

sustainable development where possible. We work with applicants in a positive and creative manner by;

- offering a pre-application advice service, as was the case with this application, and
- updating applicants and agents of issues that have arisen in the processing of their application, for example in this case further information was requested under Regulation 25 and this was provided. Changes were made to the proposed restoration scheme in response to consultation responses. The proposals to retain the haul road post-restoration and for overnight external lighting were withdrawn.

Annex 2 – Heads of Terms of Legal Agreement

- Covering the cost of monitoring implementation of 30 years Habitats Monitoring and Management Plan
- Bird Management Plan to be kept up to date and implemented in perpetuity.

Annex 3 – Consultation Responses Summary

South Oxfordshire District Council - Planning

Third Regulation 25 Consultation (June 2024)

1. Object. Fundamental objections as set out in substantive response still stand. This response should be read in conjunction with previous responses. The conclusion remains 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.
2. Ecology – Surveys are out of date. The BNG matrix should be re-calculated as it uses an older version. The ecology ES chapter is inadequate.
3. Landscape – The originally proposed planting has been re-instated on the Landscape Masterplan, which is an improvement. However, general comments still stand.
4. Trees – The updated phasing plan addressed some of the conflicts between development and Root Protection Zones, but not all of them. There are still inconsistencies with other plans. An arboricultural method statement and tree protection plan will be needed, should the development be approved.

Second Regulation 25 Consultation (April 2024)

5. Object. The additional information does not alter the fundamental objections previously put forwards/ The conclusion remains the same; the development would be contrary to SOLP policies ENV1 and ENV7 and CNP policy E3, and the benefits do not outweigh the harm.
6. Ecology – Careful consideration should be given to direct and indirect impacts on the River Thames. Habitats should be retained where feasible. Restoration provides an opportunity to create positive outcomes for biodiversity.
7. Trees – The latest phasing plan conflicts with the root protection zones of trees shown to be retained. The phasing plan should be consistent with the Arboricultural report to ensure trees are adequately protected.
8. Environmental Protection – No objection subject to implementation of proposed noise mitigation measures.
9. Landscape – The July 2022 Restoration plan appears to show a reduced planting scheme and additional loss of existing vegetation along the central north-south ditch. Black poplar and willow tree planting is no longer indicated and there is no longer a permissive path proposed south of the A4130 linking to the Thames Path.

Regulation 25 Consultation (May 2022)

10. Object. The submitted information does not change the objection as set out in previous correspondence.
11. Landscape – The development would lead to adverse landscape and visual impacts, contrary to policy. Concerned about safety and appearance of the proposed straw bales.
12. Forestry – The development will require the removal of 7 groups of trees and 6 individual trees. This have low arboricultural value and are not a constraint to the development, but new planting would be required to mitigate the loss. However, there appears to be some conflicts between the information in the phasing plans and the Arboricultural Report regarding excavation limits. The phasing plans should be amended to reflect the arboricultural constraints identified in the Arboricultural Report. A condition should be used to secure an Arboricultural Method Statement.
13. Drainage – No comments other than to note that any changes to the existing on-site ordinary watercourses will need Land Drainage Consent from the District Council.

Initial Consultation (November 2021)

14. Object. Question whether the development is viable without the marina restoration due to the relatively small amount of mineral to be extracted. This would be a new quarry and priority should be given to extensions. Question the benefits of the restoration given that the site already contains BAP priority habitats. The primary focus of growth in the District is Science Vale rather than Wallingford. Impacts on the AONB and listed buildings in the Carmel College complex.
15. Concerned about landscape impacts and do not agree some of the findings of the LVIA. The development would not be sensitively located and is not designed to minimise adverse impacts on the Chilterns AONB. The proposed earthworks would be contrary to policies protecting landscape.
16. Support the comments made by Historic England.
17. The baseline used in the Noise and Air Quality Assessments are out of date. They assessments include vague mitigation measures which cannot be controlled or enforced against. The Air Quality Assessment incorrectly refers to Elizabeth House as a residential property rather than a nursery. The woodland area in front of the nursery is regularly used by children, which is not recognised in the assessments. Overall, the harm of the proposal significantly outweighs the benefits.
18. Drainage - Only minor information on proposed surface water and foul drainage to proposed buildings and further information would need to be secured by

condition. A condition is required for the phase-by-phase management of the silt created in the washing process, to ensure that silt does not enter 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.

19. Trees - 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. Until updated arboricultural information is submitted, 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.

South Oxfordshire District Council – Environmental Protection

Second Regulation 25 Consultation (March 2024)

20. No objection in relation to noise, odour and dust, subject to implementation of mitigation measures and recommended conditions in the noise assessment. Have given specific consideration to the noise assessment, given proximity to noise sensitive receptors.

Initial Consultation (October 2021)

21. No objection. The noise assessment was based on sound levels taken during 2016. Noise levels during the pandemic lockdown would have been reduced but traffic levels are rising back to pre-pandemic levels, so I believe the assessment carried out would be representative. Elizabeth House nursery has not been accounted for in the noise assessment.

Cholsey Parish Council

Third Regulation 25 Consultation (June 2024)

22. Object. Resubmit comments made jointly with Wallingford Town Council in 2018 on application MW.0033/18, and repeat covering comments made during original consultation.

Original Response (2021)

23. Object. Resubmit comments made jointly with Wallingford Town Council in 2018 on application MW.0033/18. Nothing in the new proposals changes the Parish Council's view, other than that it no longer includes a marina. Grundon now have an operational gravel extraction in Cholsey, and this proposal would

further degrade the natural habits, impact on the Thames Path and generate additional traffic and noise pollution in the village.

24. Summary of 2018 comments: Object. Impact on ecology and loss of biodiversity associated with loss/disruption of Biodiversity Action Plan Priority Habits, concentration of human disturbance disturbing the wildlife, fish mortality from low oxygen level during summer in the marina and disturbance of non-target species by the bird management plan. Impact on users of the Thames Path and Rowers. Bird Strike and risk of this impact on the operation of RAF Benson. Impact on Air Quality, especially Nitrogen Dioxide levels from vehicle on the downwind Wallingford AQMA and diesel-powered boats. Visual Impact on the setting of the Chilterns and North Wessex Downs AONB, the setting of Cholsey and Wallingford, the River Thames National Trail and the listed buildings at Carmel College. Traffic, particularly in cumulation with the nearby 70 bed care home. Negative impact on Economy and Tourism as those using the marina are unlikely to shop or use local pub/restaurant as they would take their boat elsewhere, impact on RAF Benson, creation of few jobs, devaluing of Thames River Path.

Wallingford Town Council

Third Regulation 25 consultation (June 24)

25. Support the comments on South Oxfordshire District Council.

Regulation 25 consultation (May 2022)

26. The fundamental reasons for objection to this planning application remain, despite the further information provided. Support the previous objections. The site is within the setting of the AONB, an exceptional landscape which should be safeguarded. Disagree with the statement in the additional information that the site has a limited zone of visual influence. Concerned about impact on Thames Path.

Initial Consultation (2021)

27. No response

Crowmarsh Parish Council

28. Object. The proposed industrial process is inappropriate in this location. It would harm the setting of the River Thames and the Thames Path National Trail and negatively affect the amenity of users of these. It would harm the setting of the Chilterns AONB, the listed buildings at the former Carmel College (notably the Grade II* listed Julius Gottlieb Gallery and Boathouse designed by Sir Basil Spence) and the church of St John the Baptist - all immediately across the river from the application site. The application site and surroundings are in the Thames Wallingford to Goring Conservation Target Area, where the policy requires restoration and improvement in biodiversity, which would be totally undermined by gravel extraction here. As well as loss of agricultural land, the proposed

development carries risks of damage to the subsurface hydrology of the River Thames floodplain and the release of sediment as well as of water, air and noise pollution from the operations themselves. This is also an area of archaeological interest, with the important late Bronze Age settlement site at Whitecross Farm.

County Councillor – Cllr Felix Bloomfield

29. No response received.

Environment Agency

Third Reg 25 consultation (July 2024)

30. Have reviewed amended plans and can confirm previous comments still stand. The proposal would be acceptable if planning conditions are included as previously requested.

Second Reg 25 consultation (April 2024)

31. No objection, subject to conditions. Confirm that the comments from the January letter still apply.

Informal Consultation (January 2024)

32. No objection, subject to conditions. Previously raised issues regarding fluvial flood risk and offsite detriment have now been addressed and a Waste Recovery Plan has been provided confirming that the restoration would be a recovery operation rather than waste disposal. Conditions are required to ensure restoration material is only inert waste, the mitigation measures detailed in the FRA are implemented, no ground raising above baseline levels, submission, approval and implementation of a groundwater and surface water monitoring and maintenance plan, a restoration plan, a CEMP, a monitoring plan for the deposit of waste, and a Restoration Strategy and Landscape Management Plan.

33. Advises that management of groundwater risk is the responsibility of the LLFA. The proposal may affect groundwater flows by acting as a barrier, therefore the LLFA may need to request further information as to the need for mitigation.

May 2023

34. Maintain in-principle policy objection to landfilling in flood zone 3b. Will address technical objection separately.

September 2022

35. Maintain objection as Flood Risk Assessment does not comply with NPPF requirements. Model files should be provided for review because the letter from the applicant confirms that modifications were made to the Environment Agency Abingdon Flood Scheme model. It is not clear how the applicant has arrived at a 12% climate change allowance. The development lifespan is stated as five years, but this does not take account of restoration. The sequential test should be

applied by the Local Planning Authority in accordance with Planning Practice Guidance.

Regulation 25 Consultation (May 2022)

36. Maintain objection as Flood Risk Assessment not satisfactory as it fails to consider how a range of flooding events would affect people and property.

Initial Consultation (October 2021)

37. Objection due to inadequate Flood Risk Assessment (FRA) and insufficient information regarding impacts on potable water supplies. The site lies within the functional floodplain, adjacent to the River Thames, over a principal and secondary aquifer and within close proximity to a domestic water abstraction at Windward House. A Climate Change Assessment has not been included, therefore the modelling provided needs to be update. Concerned about impacts on groundwater and the effects on potable water at Windward House.

38. To overcome these objections, a revised FRA and a satisfactory risk assessment demonstrating that risks to potable water can be safely managed, are required.

39. Concerned about the clay barrier proposed as mitigation to protect the Windward House abstraction. This would be dealt with through the Transfer Licence. An Environmental Permit will be required for works close to the river.

Natural England

40. Responses received to subsequent consultations confirm

Initial Consultation

41. No objection. The proposed development would not have significant adverse impacts on statutorily protected nature conservation sites. Consideration should be made of the impacts on the AONB, impacts on best and most versatile agricultural land and impacts on the Thames Path and The Ridgeway National Trails.

42. Responses received to subsequent consultations confirmed there is no change to these comments.

Historic England

Regulation 25 Consultation (May 2024)

43. No further comments, but the previous advice provided still stand.

Regulation 25 Consultation (November 2022)

44. The proposals would result in some temporary harm to the listed buildings, for the duration of the mineral extraction operation. Beyond the extraction period, the proposed landscape reinstatement would provide a setting that would have a neutral impact on the significance of the listed buildings.
45. Therefore, it is for the Council to determine if, in accordance with NPPF paragraph 200, the temporary harm to the listed buildings is justified and if it is whether the public benefits outweigh this harm, as set out at paragraph 201.

Initial Consultation (October 2021)

46. Concerned about the application on heritage grounds, due to the proximity to the former Carmel College at Mongewell Park. Carmel College closed as a school in 1997 and now has permission for conversion to housing. Mature trees surrounding both listed buildings filter views out from the environs of both listed buildings. However, the proposed development site is clearly visible from both, particularly the grade II* boathouse, as there is a gap in the trees which allows reasonably clear views across the river. Gravel extraction would dramatically change the character of the development site, causing the open field to become an unattractive industrial landscape for 6 years.
47. The proposed restoration plan is markedly improved from the earlier marina scheme.
48. Due to the timescales, it is not possible to minimise negative change to the setting of the listed buildings through planting, although it may be possible to improve planting along the riverbank at the start of the scheme, rather than waiting until restoration.
49. The harm to the grade II* boathouse and grade II church of St John the Baptist cannot be considered to have been justified and outweighed by public benefits as required by paragraphs 200 and 202 of the NPPF at present as the OMWLP Part 2 has yet to be prepared and the relative merits of all potential sand and gravel extraction sites properly evaluated.
50. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

CPRE

Third Regulation 25 Consultation (June 2024)

51. Object. Previous comments still stand.

Regulation 25 Consultation (2022)

52. Object. The original reasons for objection remain, despite the further information submitted. The site is not suitable for aggregate extraction as it is in the setting of the Chilterns AONB. The LVIA underestimates the impacts of the development and overestimates the impacts of the mitigation. The site is highly visible from the Thames Path. The proposed straw bales would make only a marginal amelioration.

Initial Consultation (October 2021)

53. Object due to loss of amenity in particular the Thames Path and the AONB, loss of biodiversity especially from the removal of vegetation, flooding particularly due to disruption of flood storage through inert infill, traffic due to additional HGVs on the Wallingford bypass and loss of local distinctiveness and green space leading to the inevitable merging of Wallingford, Cholsey and other nearby settlements.

Chilterns Conservation Board

Second Regulation 25 Consultation (April 2024)

54. Object. Endorse the objections raised by other consultees in relation to impacts on the AONB. The development would have a significant adverse impact on the setting of the AONB and on tranquillity. The development would undermine the diverse and resilient nature of the Chilterns AONB, and result in a disconnect between people and nature.

Regulation 25 Consultation (May 2022)

55. Object. Make brief observations in relation to the additional information. Accept that the Ridgeway National Trail is set away from the site. However, the more pronounced impact is on the Thames Path. There would be a highly material change to the peaceful enjoyment of this popular route. The site is not allocated. There would be harm to the AONB setting. One of the special qualities of the AONB is its relative tranquillity.

Initial Consultation (Oct 2021)

56. Object. The proposal would harm the setting of the AONB during the operational and restoration periods. There would be impacts on the Thames Path and also glimpsed views from The Ridgeway National Trail as it passes through Mongewell. Great weight must be given to the protection of the AONB and its setting. The policies in the AONB Management Plan confirm that development visible from the Chilterns escarpment, or noisy developments which affect tranquillity, can affect the setting of the AONB. The application is premature pending the Part 2 plan.

Ministry of Defence (MOD)

Third Regulation 3 Consultation (July 2024)

57. No objection. Repeats comments made in August 2022 response.

First Regulation 25 Consultation – Further Response (August 2022)

58. No objection, subject to design requirements including there being goose proof fencing adjacent to the Thames and a commitment to fence the area of reed and wet woodland to prevent damage by livestock and ensure good plant overage. Welcome the removal of the scrapes. The restoration proposed should not result in exploitable habitats for larger hazardous bird species.

First Regulation 25 Consultation (June 2022)

59. The updated Bird Management Plan does not incorporate all the changes previously requested have not all been made. It should be further amended to include a proposed frequency of monitoring and a commitment to immediate action should trigger levels be met. It should also include failure criteria which would trigger a review of the management plan. The shallow scrapes next to the River Thames have the potential to attract a range of large and flocking birds and should be removed.

Initial Consultation (December 2021)

60. A Bird Hazard Management Plan has been submitted with the application; however, some changes are needed. The trigger levels for geese should be revised, the plan should include a commitment to disperse hazardous birds at the reasonable request of RAF Benson and the plan should be in perpetuity rather than limited to the 5-year aftercare period.

OCC Transport Development Management

Second Reg 25 Consultation (March 2024)

61. No further comment.

Final Response (August 2022)

62. Confirm that a routeing agreement is not required to prevent HGVs going through Wallingford, as there is already a Traffic Regulation Order in place to prevent vehicles over 7.5 tonnes routeing along Winterbrook and through Wallingford. A Construction Traffic Management Plan would also not be required for the scheme were planning permission to be granted as it would serve little purpose, considering there would be no construction phase as such and that the development proposal would have less than a 2% impact on the local highway network, which would be acceptable.

First Reg 25 Consultation (May 2022)

63. No objection, subject to conditions, a routeing agreement and a legal agreement to secure a Traffic Regulation Order to prohibit right-turn movements in to the site

from A329 Reading Road and right-turn movements out of the site onto A4130 Nosworthy Way. A Section 278 agreement will also be needed to deliver the works to the site access.

64. Conditions are required to ensure the new access is in place prior to extraction, vision splays are provided and maintained, a Construction Traffic Management Plan is provided and that any gates are set back at least 18 metres from the carriageway and open inwards.
65. Satisfied following receipt of the additional information that there are no highway safety concerns. The Transport Assessment demonstrates that the additional 100 HGV movements per day would have less than a 2% impact on the local highway network, which is acceptable.

Initial Consultation (November 2021)

66. Objection. Further information and details are required. Further assessment is needed to demonstrate that the access arrangements would be safe. Details should be provided showing how an acceptable visibility splay would be provided along the A4130. Dimensions and geometry for the left-in junction should be provided. Swept path analysis should be provided. The taper of the left-in junction should be amended. A longitudinal section plan showing proposed levels and gradients should be submitted. A Stage 1 safety audit for the access arrangement is needed. A revised highway impact assessment calculation for both the A329 and A4130 is required.

OCC Rights of Way

67. No objection. The straw bale visual buffer proposed next to the public footpath may become unstable, be prone to vandalism and/or degrade over time. Provision should be made for regular periodic inspection and replacement of the bales.

OCC LLFA

Third Regulation 25 Consultation (June 2024)

68. No objection, subject to condition as set out in earlier response.

Second Regulation 25 Consultation (April 2024)

69. No objection, subject to condition as set out in earlier response.

Regulation 25 Consultation (May 2022)

70. No objection subject to a condition requiring details of the installed drainage scheme to be submitted to the Minerals Planning Authority.

Initial Consultation (October 2021)

71. Further information required. Concern over the surface water treatment. The applicant should demonstrate whether the lagoon has an overflow mechanism for time of severe cumulative rainfall and prove that the lagoon will be sufficient to provide water quality improvements before discharge into the proposed ditch. Justification is required that any overland flows will be treated before reaching the Thames. Evidence of required permits is required. Groundwater monitoring should be undertaken for the duration of the proposed works. Calculation files demonstrating that surface water flow will be maintained to Greenfield discharge rates for all relevant return periods, including a 40% Climate Change allowance. Further information required regarding mitigated surface water flows post remediation. Evidence of consent to discharge into ordinary watercourses is required to be provided.

OCC Archaeology

72. No objection, subject to conditions for a written scheme of investigation and a staged programme of archaeological investigation including processing, research and analysis and a full report for publication. The site is located in an area of considerable archaeological interest, 260 metres south east of a possible Neolithic hengiform monument and a pit alignment or segmented ditch. Bronze Age barrows have been recorded immediately west of the proposed development from aerial photographs and a geophysical survey. This geophysical survey also recorded a probable Prehistoric or Roman settlement site consisting of clusters of possible pits or tree throws, field boundaries or trackways, possible ditches, hearth or similar burning, possible enclosure and structures. A considerable number of Roman coins have been recorded for this field on the Portable Antiquities Scheme. Trenched evaluation to date has only focused on the western areas of the site and this has recorded a number of archaeological features to be present across its northern extent. This development will therefore impact on these identified archaeological features, potential further associated evidence with which may also be present across the site's eastern extents.
73. Therefore, should planning permission be granted, conditions should be attached for a staged programme of archaeological investigation to be maintained during the period of construction.

OCC Ecology

Third Regulation 25 Consultation – Second Response (July 2024)

74. No objection, subject to conditions. A letter from the applicant's ecologist following an ecology site walkover in July 2024 has addressed concerns around the age of survey data. Pre-commencement surveys should still be conditioned.

Third Regulation 25 Consultation – First Response (July 2024)

75. Further information needed. The proposals would result in the loss of approximately 2 hectares of the priority habitat coastal floodplain grazing marsh. However, the proposed measures would compensate for the adverse effects of the loss of this habitat. There is a policy requirement that no significant harm should be caused to priority habitats unless the need for and benefits of the proposal outweigh the harm.
76. Given that at least 3 years have lapsed since the ecological surveys supporting this application were undertaken, request that the applicant has their ecologist undertake a site visit to inform a review of the ecological appraisal including whether any surveys need to be updated.
77. Would like clarification on the areas shown as wet woodland in the restoration plan, as the BNG metric does not include this.
78. Conditions and a legal agreement would be required to secure 30 years long term management, including species measures set out in the Ecological Appraisal.

Regulation 25 consultation – Third Response (September 2022)

79. No objection, subject to conditions. Satisfied that the scheme demonstrates an overall net gain in biodiversity in excess of 10%. To ensure that the habitats proposed, and the habitat condition anticipated in the metric, are achieved, habitat management and monitoring should be secured for the site for a 30-year period. An aftercare scheme, and habitat management and monitoring plan will be needed to set out how this will be delivered. This should also include species measures as recommended in the Ecological Appraisal, such as bat and bird boxes and log piles. Conditions are required to ensure that Protected Species are appropriately addressed, including conditions requiring up to date surveys should they become out of date, a revised ecological mitigation scheme should updated surveys suggest this is required, up to date water vole and otter surveys prior to commencement, full details of external lighting, a scheme detailing the location and design of bird and bat boxes, a reptile mitigation scheme, a method for felling silver birch.

Regulation 25 consultation – Second Response (June 2022)

80. Requires a review of the restoration plan, to ensure that the BNH metric trading rules are met.

Regulation 25 consultation – First Response (May 2022)

81. Request for clarifications regarding BNG metric calculations.

Initial Consultation (October 2021)

82. Further information required. The scope of the ecological surveys is satisfactory; however, some clarifications are required before a full response can be provided.
83. The site contains a potential Black Poplar tree; however, it is not clear that it is to be retained. The Ecology Report does not confirm whether there are invasive species on the site. There are some discrepancies between the Ecology Strategy and the Biodiversity Metric.

OCC Landscape Advisor

84. Comments are summarised below and available on the website in full as usual. However, due to the objection from the Landscape Officer and the significance of these comments to the decision on this application, the full comments are also provided in Annex 7 to this report for ease of reference.

Third Regulation 25 Consultation (July 2024)

85. No changes to previous comments. The latest version of the Conceptual Restoration Plan includes less agricultural land, which is an improvement. No further information has been provided in relation to queries about the height of the straw bale barrier, the lack of information about circulation areas and access points between phases.

Second Regulation 25 Consultation (April 2024)

86. These further comments should be read in conjunction with previous comments. No material change to previous comments. The development would introduce quarrying to an area which is sensitive in landscape and visual terms, causing adverse landscape and visual effects, including on the Thames Path, River Thames Corridor and Chilterns AONB and its setting. These effects would be temporary, which is a mitigating factor. However, this is not considered to justify the impacts. The development does not meet the requirements of national and local policy. However, if permission is given, conditions should be attached to cover a Construction Environmental Management Plan, retention of existing vegetation, lighting, mitigation planting and bunding, details of treatment of the eastern site boundary with the Thames Path, a detailed restoration plan, a landscape management plan, and aftercare scheme and implementation of long-term management.
87. Additional information received includes a Flood Risk Assessment, Waste Recovery Plan and Proposed Phasing Plan. The submitted plans should provide further detail, including on the height of the proposed straw bales, details of internal access points between phases. Concerned that the scrapes and shallow pools have been removed from the restoration plan. Accept that the noise assessment does not suggest that the proposal would result in a significant increase in noise levels. Consider therefore that effects on the tranquillity of the Chilterns AONB would be limited to areas with visibility of the site, such as the eastern bank of the river. Photomontages have not been

provided and might be helpful for committee members in the decision-making process. Section 245 of the Levelling Up and Regeneration Act places on local authorities a duty to further the statutory purposes of AONBs. Therefore, it is important not only that adverse effects on the river corridor are avoided or mitigated, but also that these characteristics elements are actively enhanced in the restoration.

Regulation 25 Consultation (June 2022)

88. Object. Previous comments still stand. Additional information has been considered but does not change 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.
89. 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.
90. The approach to tree protection appears suitable and should be secured by condition. The current phasing plans show extraction boundaries close to retained vegetation, so updated drawings will be required and this may affect the quantity of mineral. Further detail on mitigation measures have been provided. The combination of existing boundary vegetation and the proposed bunds is expected to be effective in mitigating impacts of operations within the site on low-level views from the west and northwest. Visibility of operations would increase when bunds are removed to allow extraction from beneath them. Views will also be possible from the entrance and exit points. Occasional views will be possible from the A4130 where it is elevated over the Thames. Visibility will increase in winter months. Remain unconvinced about the use of straw bales and note that full details have still not been provided. Use of bales as a linear feature as proposed would look incongruous in the landscape. It is suggested that a blear bankside route closer to the edge of the River Thames could be delivered to further mitigate views from the Thames Path. This has the potential to adversely impact riverside vegetation and biodiversity and such a measure would need to be discussed with OCC Rights of Way, Thames Path National Trails officer, the Parish Council and other interest groups.
91. It is noted that the site would be progressively restored, but it should be remembered that restoration of habitats takes time. Progressively restored areas would not deliver immediate landscape and visual benefits. Do not believe that the proposed mitigation measures would 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.
92. Still consider the LVIA to understate impacts on local landscape character and views. Consider overall sensitivity levels of the site to be high rather than

medium. Consider the magnitude of impact during operation to be higher than stated, high adverse during operation, resulting in a notable adverse (significant) overall effect on the local landscape character.

93. 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. Therefore consider that the restoration would 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 long-term management of habitat, for 25+ years, which would need to be secured should the development be approved.
94. Also consider that some of the operational visual effects have been underestimated and that the overall impact on the Chilterns AONB is at least medium, resulting in a notable adverse (significant) effect during operation. Consider the development would adversely affect the setting of the AONB, through the loss of tranquillity through the introduction of lighting, noise, or traffic movement, and the introduction of significant or abrupt changes to landscape character. The development would also 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.
95. Consider that the proposal is contrary to NPPF paragraph 176 and OWMCS policy C8 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.
96. OWMCS policy C8 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. Proposal not considered in accordance with SOLP policy ENV1 or the Chilterns AONB Management Plan.
97. A number of landscape conditions would be required should the development be approved

Initial Consultation (October 2021)

98. Object. Do not agree with the conclusions of the LVIA. Consider some of the landscape and visual impacts would be greater than stated. For example, I consider 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. 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 relies heavily on mitigation, but although new planting is welcomed it will take time to mature. Existing planting will assist in softening views, but would not be fully effective in winter. It is not clear how existing vegetation would be protected from excavations and material storage. Further detail should be provided on the 3-5-metre-high bunds as they can adversely impact character and views.

99. The submitted tree survey has not been updated from the previous application. It contradicts the planning statement which suggests that the hedgerow and trees in the centre of the site would be retained. Further information is required on root protection areas, buffers and how vegetation will be protected.
100. 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.
101. Users of the Thames Path will have uninterrupted views of the development and their experience will be adversely affected by the quarrying operations through views, noise and dust. The proposed straw bales are not 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.
102. Overall, the proposed restoration to agricultural land and nature conservation looks acceptable in landscape terms.
103. The application is an improvement from the previous proposals and the impacts would be temporary. However, 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 during the operational phase. I consider the development to be in conflict with national and local landscape policies, and I can therefore not support the application.
104. I therefore do not consider these to be an effective measure in mitigating adverse effects on users of the Thames Path and the AONB.

OCC Tree Officer

Third Reg 25 Consultation – Third Response August 2024

105. The updated plans address previous concerns. A tree protection condition should be added to any permission granted.

Third Reg 25 Consultation – Second Response July 2024

106. Amended plans should be provided prior to determination, as the plans currently show bunding within Root Protection Zones and the restoration and working plans also show works within the RPZ of tree T70. This should not be left to condition. Comments in relation to T33 are noted, OCC will seek compensation for the removal of this tree through the s278 process.

Third Reg 25 Consultation – First Response June 2024

107. Further information required. There should be justification of why the access can't be relocated slightly to the east, avoiding the loss of tree T33. There are inconsistencies in the bund locations shown on current plans. Plans show works in the Root Protection Zone of tree T70. These plans should be amended. In its current form the application is contrary to SOLP policy ENV1. If these amendments are made and permission is granted, this should be subject to a tree protection condition requiring a Tree Protection Plan and Arboricultural Method Statement.

First Reg 25 Consultation - August 2022

108. No objection, subject to conditions. The Arboricultural Impact Assessment (AIA) includes a Draft Arboricultural Protection Plan. This does not include details of the location of tree protection fencing, though it does identify general construction exclusion zones. Taken together the new Root Protection Zones and Cross Section Plans indicate that sufficient distance can be maintained between the trees to be retained and the limits of excavation / proposed bunding. However, the plans are not comprehensive and consistent. More detailed, final drawings are required, however these can be secured by pre-commencement condition.

OCC Public Health

109. No objection, subject to a condition for a comprehensive dust management plan including details of air quality monitoring at nearby receptor sites and proposals for mitigating harm from dust, including from vehicles that transport materials. The plan should also include explicit criteria describing when action should be taken, a clear mechanism for monitoring and responding to complaints, and plans for what happens outside of working hours.

Anex 4 – Representations

1. A total of 352 letters have been received from local residents. The points raised are summarised below. One was a letter of the support and the others were objections. 252 of these were received during the first consultation, a further 99 was received during the second consultation period, 1 further letter of objection was received during the third consultation period and none were received during the fourth consultation period. Objectors were informed that they did not wish to write again if their views hadn't changed, and their original comments would still be taken into account.
2. Cllr Sue Roberts, SODC Councillor for Wallingford objected to the proposals on the basis of it being an inappropriate site due to proximity to the AONB and the leisure uses of the field, Thames Path and river.
3. Other representations are reported anonymously, and the issues raised by objectors are summarised below.

Environmental Destruction

- Impact on species including grass snakes, barn owls, otters, beavers, deer, rare butterflies and snails
- Impact on habitats, including BAP priority habitats
- Impact on land which is in a Conservation Target Area
- Impact on beautiful, wild area adjacent to Thames
- Not possible to restore flood meadows which have developed over centuries
- Economic benefits do not outweigh environmental cost
- Net gain is required – this would be hard to demonstrate

Officer response – There has been no objection from the OCC Ecology Officer and net gain has been demonstrated. Therefore, although there would be temporary disturbance to habitats, in the long term, the scheme would be beneficial for habitats and species. Conditions could be used to ensure that mitigation measures are implemented to protect wildlife.

Industrial development in countryside/ near residential properties

- Noise, including reversing beepers
- Dust, including fine silica dust
- Will look unattractive
- Concern that it would be permanently developed after extraction complete

Officer response – The proposals are for a temporary development and the site would be restored after extraction was complete. There is the potential for visual, noise and dust impacts during the operational period, however, the application was supported by an Environmental Statement which sets out that these impacts can be mitigated to acceptable levels. There has been no objection from the Environmental Protection Officer and conditions could be attached to any consent

granted to ensure that relevant mitigation measures are implemented. Once restored the site would have greenfield site status in planning terms.

Landscape and Visual Impacts

- Impacts on Thames and AONBs
- Loss of pastoral landscape which is distinctive and rare remnant of agricultural heritage
- Impacts on people approaching across the river bridge from west – elevated position
- Would destroy green fields which are pleasant to look over
- Visual impacts on people driving past
- Concerned visual impacts have been understated in the application

Officer response – There would be impacts on the landscape during the operational and restoration periods, and this is considered in detail in the report.

Need for mineral

- No need for further gravel extraction in Wallingford – another gravel site very close
- Site should not be allowed to be worked concurrently with nearby site at New Barn Farm
- Mineral wouldn't be used locally
- Demand for building materials likely to fall soon when inflation rises
- Recycled aggregate should be used instead of digging new quarries
- Recycled glass should be used in concrete
- Need assessment fails to recognise that increased sales in this area are due to the existing quarry, rather than an increase in general demand.

Officer response – The need for the mineral is addressed in the report. The Oxfordshire Minerals and Waste Local Plan contains policy M1 stating that there is a preference for mineral to be supplied from recycled materials rather than primary aggregates, however, there is still a need for primary minerals.

Impacts on Leisure and Recreation

- Loss of pleasant, tranquil, green, open landscape for walking and picnicking, impacts on physical and mental health
- Noise impacts from machinery
- Impacts on people using boats on river
- Impacts on rowing on this particularly wide stretch of river
- Site connects Wallingford and Cholsey and is well used
- Impacts on anglers
- Impacts on swimmers
- Proximity of site to urban settlement makes its retention more important – site is well used by the community

- Impact on high profile running and rowing events in the area which attract tourists and visitors
- Negative economic impacts as walkers and tourists will be discouraged from the area

Officer response – There would be some impacts on users of the River Thames and Thames Path. However, there would be a buffer zone between the river and the workings, which would mitigate impacts. There is no formal public access to the application site other than along the Thames Path, which would remain in place.

Impact on Thames Path

- Visual, noise and dust impacts on this National Trail, used by locals and tourists
- Currently the only path out of Wallingford not hemmed in by construction
- Tranquil part of the Thames
- Concern about access to riverbank and path
- Bunds and bales would disturb enjoyment and obscure views
- Proposed fence and straw bales will not provide adequate protection/ will not create a pleasant walking environment
- Prevailing winds would make dust impacts on Thames Path worse

Officer response – The Thames Path would remain open and there would be a buffer between the path and the workings, but there would still be some impact on this part of the Thames Path in terms of noise and visual impacts. Conditions could be used to ensure that impacts were minimised to acceptable levels and the development would be temporary.

Flood Risk

- Concern that inert fill will change groundwater flows
- Concern that bunds and earthworks would lead to flooding upstream and cause floodwater to divert around the site
- Concern that lagoons would lead to flooding downstream
- Concern that ground stabilisation techniques would be needed on the A4130 embankment and additional flood storage capacity would be needed to compensate for the additional embankment required
- Concern that development in floodplain would cause flooding in Wallingford
- Threat to human life on the site due to fluvial flooding
- Alteration to floodplain in this location will drive flood water into Carmel College site, putting lives at risk

Officer response – Detailed assessment work has been submitted with the application and there has been no objection from the Environment Agency, or the Lead Local Flood Authority.

Water Quality

- Receding flood water taking fuel from plant and sediment from stockpiles into the Thames
- Concerned about pollution from landfilling beneath adjacent to river in floodplain
- Pollution of river/aquifer through infilling
- Sediment from gravel washing could contaminate river
- Water will be lost from aquifer through evaporation from waterbody
- Impacts on river stability
- More detail is needed about waste infill to ensure there is no water pollution

Officer response – Detailed assessment work has been submitted with the application and there has been no objection from the Environment Agency, or the Lead Local Flood Authority.

Impacts from HGVs

- Congestion
- Noise
- Dust
- Air pollution, particularly considering cumulatively with other new developments in Wallingford
- Concern about impacts on Reading Road
- Materials should be imported and exported via the River Thames
- Dangerous for walkers and cyclists on Reading Road
- Congestion on Wallingford bypass
- Even if mineral is used locally, HGVs will still be required to import inert fill from elsewhere for restoration
- Safety along the route to Didcot
- Danger to children at nursery and parents collecting them
- Concern that stone falling from lorries would damage cars and create a mess on the road
- Cumulative traffic impacts with other development in area

Officer response – There has been no objection from Transport Development Control. The site would have direct access onto A-roads and it is considered that there is capacity on the network to accommodate the additional movements proposed.

Impacts on the A4130 in particular

- Concern that the A4130 embankment is weak and subsiding and main egress from the development would run up the weak section of the embankment
- Concern that the road is dangerous for cyclists due to inaccurate road markings
- Concern about impacts of HGVs on road surface
- Concern about cyclist safety due to OCC Highways actions – poor signage etc

Officer response – The concerns about the A4130 embankment and road markings and signage appear to be a wider issue which are not directly related to this planning application.

Inadequacies in application/ES (prior to Reg 25 request)

- The application ignores the impact on the 550 houses that are currently planned to be constructed on 'Site E' at Wallingford and the impact on the recently constructed houses at the CABI development on the other side of the river
- Concerned that vibration measurements are not credible due to poor field practices
- Question the conclusions regarding the quality of the gravel resource
- Does not mention invertebrates
- Further detail is required on the infill material
- Arboricultural report is from a forestry perspective and does not take account of biodiversity value
- Plans do not show the mature trees in centre of field
- More detail should be provided on how the Thames Path will be fenced and maintained
- Plans are out of date and don't show recent surrounding development

Officer response – Following the first period of consultation, a request for further information was made and further information was submitted. Following a consultation, there were no objections amongst technical consultees, other than the OCC Landscape Officer, which is addressed in the report.

Inadequacies in application/ES (following the Reg 25 submission)

- Disagree with assessment of tranquillity – it is a highly tranquil site
- Disagree with assessment of visual impacts – site is visible from surroundings
- Response on groundwater is not based on data or modelling. More should be done.

Officer response – As set out in the report, the OCC Landscape Officer also had queries on parts of the Landscape and Visual Impact Assessment. These concerns have to be balanced with other policies and the temporary nature of the harm. There has been no objection from either the EA or the LLFA on groundwater.

Contrary to Policies

- Contrary to Wallingford Neighbourhood Plan Reg 15 version – as it would not improve biodiversity and would lead to traffic, noise and air pollution
- Contrary to SOLP and OMWLP policies due to landscape impacts
- Site not in the South Oxfordshire Core Strategy
- Premature as Part 2 plan not been prepared yet
- Site not allocated in OMWLP
- The sequential test and exception test should be applied to the landfill element
- Disposal of waste in the functional floodplain is contrary to NPPF technical guidance

- Contrary to Green Belt policies

Officer response – Relevant planning policies are addressed in detail in the report. It should be noted that the site is not within the Green Belt. The site lies within Cholsey Parish and is covered by the Cholsey Neighbourhood Plan, rather than the Wallingford Neighbourhood Plan.

Concern about impacts on specific properties

- Impacts on properties on the other side of Windward, which are not mentioned in ES
- Concern that development would increase the flood risk at White Cross (one of closest houses)
- Impact on vulnerable babies and elderly people at Elizabeth House day nursery and Waterside Court care home, including air quality as pollution is already high
- Concern about impacts on Windward House – noise, dust, vibration and water supply. Only water supply is via a well, the aquifer is only a few metres down, concerned about reduction in water supply and contamination
- Own land immediately adjacent to the site area, concerned about noise, dust and visual impacts on land and that the application site cuts across access to their land
- Wallingford Rowing Club – concerned about air pollution from dust as athletes are more vulnerable
- Concerned about noise and dust at residential properties in Carmel College
- Dust impacts on adjacent solar farm
- Close to new areas of housing

Officer response – The Environmental Statement has assessed the impacts on relevant sensitive receptors. The Environmental Protection Officer has considered the ES and has no objections to the proposals.

Opposed to further development in Wallingford

- Loss of local distinctiveness as gaps between villages are filled with housing and industry
- Wallingford already doing its part in building houses and industrial units
- Challenge the assumption that economic growth is unquestionably good and that housing need and major capital developments should go unchallenged
- Wallingford is a market town – not suitable development
- Wallingford has been over developed and infrastructure cannot keep up
- No benefits for the local area
- If permission is granted it should be subject to an order to restrict the future use of land

Officer response – Points raised about development around Wallingford appears to be general concerns rather than a specific objection to these proposals, which would be temporary. The land would be restored to green field agricultural land following the mineral extraction.

Restoration

- Is there any guarantee the restoration proposals would be implemented?
- Ponds and reedbeds would be preferable to the agricultural restoration
- Concern that it will be left unrestored and end up with a marina by stealth
- Restoration proposals show a lack of understanding of current habitat – should not be destroyed and replaced with something different

Officer response – The restoration proposals would be secured by condition. The site would be progressively restored as it is worked. Whilst ponds and reedbeds might be preferable from an ecological perspective, the MOD has concerns about bird strike risk at this site therefore the extent of water habitats has been minimised.

Process

- Site notices on the gate was facing away from town
- Inadequate consultation with the community
- Conditions should be used to control the timescale of each phase and the restoration
- Waste use for infill should be monitored
- Stringent conditions should be imposed if development is approved

Officer response – The correct planning process has been followed in determining this application. Conditions would be used to control the timeframe of the development. Waste fill imported to the site would be subject to an Environment Agency permit. OCC would monitor compliance with conditions on the planning consent.

Impacts on heritage assets

- Impacts on listed buildings within the Carmel College site
- Site is of archaeological importance and do not believe contractor would take enough care

Officer response – The impact on heritage assets was assessed through the EIA process. There has been no objection from OCC archaeology and although Historic England have raised concerns about listed buildings in Carmel College, they have not objected.

Climate Change

- Climate change and carbon – construction industry is a major contributor
- Destruction of grass, shrubs and trees will reduce area's ability to absorb CO₂.
- Climate change impacts - floodwater plain captures more carbon than trees

Officer response – The ES contains a section on climate change, which concludes that there would be a minor positive contribution to offsetting the wider effects of climate change.

Better uses for the site

- Site would be better used for housing or a marina
- Limited economic benefits – would not create many jobs
- Site should be developed as a nature reserve or riverside park

Officer response – The application that has been submitted needs to be determined on its merits. There is not currently a proposal for an alternative development which would deliver a marina, housing, a park or more jobs.

Support

- In the long term it will provide better habitat for wildlife and green space for people

Other Impacts

- Air quality – dust from operations
- Impacts on high quality agricultural land

Officer response – The ES assesses air quality and there has been no objection from the Environmental Health Officer or the Public Health team. The site contains 45% best and most versatile agricultural land, however, this would be restored following mineral extraction. There has been no objection from Natural England.

Annex 5 – Environmental Impact Assessment

1. An Environmental Statement has been submitted with this application, setting out the findings of the Environmental Impact Assessment. This is summarised below.
2. Sections 1-4 introduce the development and the site. Section 5 considers alternative methods, sites and forms of development. This concludes that if the mineral was not worked the site would remain agricultural and not contribute towards the rebalancing of supply towards the south of Oxfordshire. It considers working the site over a shorter timeframe and concludes that this would lead to greater traffic impacts. It concludes that alternative sites nearby are constrained by the AONB or highways access. It states that as the site is in the floodplain it does not have potential for many other types of development.
3. Section 6 covers surface water and flood risk. This states that the Flood Risk Assessment (FRA) modelling show a decrease in water levels during the operational period as additional flood storage capacity is created. Following restoration there would be a reduction in water levels upstream, but an increase downstream. The increase is considered to be small and not significant. No further mitigation is proposed, other than that incorporated into the design of the scheme.
4. Section 7 covers hydrogeology and covers the impacts of dewatering. It concludes that there would be no significant impacts on the local hydrogeological regime either during operations or after restoration, subject to the proposed mitigation measures. This states that any lowering of the water table would be temporary and reversible. A clay filled trench is proposed on the southern boundary to Phase 3, along with water level monitoring.
5. Section 8 covers highways and traffic and concludes that the proposed additional HGV movements would not be significant compared to existing traffic flows.
6. Section 9 covers noise. Ten noise sensitive locations are identified, and the findings of baseline monitoring results are provided. It states that background noise levels are high due to the proximity of roads. It predicts the noise at these locations during normal quarry operations and concludes that in all cases noise levels would be less than 55 dB. A cumulative noise assessment with New Barn Farm quarry was also carried out, cumulative noise levels were also predicted to be less than 55 dB. Noise mitigation measures are outlined including working within standard hours only, using silencers on machinery and minimal noise on reversing beepers, starting up machinery sequentially, minimising drop heights, maintaining haul routes and maintaining perimeter bunds.

7. Section 10 provides details of the air quality assessment that was undertaken. This concludes that predicted PM10 and PM2.5 emissions from the site would not result in exceedances Air Quality Objectives and that it is unlikely that the proposals would lead to a significant reduction in air quality. Mitigation and monitoring measures are proposed to help ensure that any dust and air quality impact is limited in scale and duration. These measures include minimising drop heights, controlling vehicle speeds, seeding restored areas as soon as possible, sheeting lorries, using water to reduce dust in the processing area, routing HGVs to avoid AQMAs and use of a road sweeper.
8. Section 11 covers landscape and visual amenity. A Landscape and Visual Impact Assessment (LVIA) has been undertaken which concludes that there would be medium adverse impacts on landscape during the operational phase but following restoration the impact would be medium to high beneficial. No significant adverse impacts are identified on any receptor, although a moderate adverse impact is identified at four receptors (Boat House, Thames Path, Elizabeth House day nursery and Barchester Waterside Court Care Home) during the operational period. There would be no long-term visual effects following restoration.
9. Section 12 covers soils and agriculture. This states that the site is poor quality agricultural land with only one field suitable for crops. However, 48% of the site is classified as Grade 2 or 3a. This part of the site would be restored to agricultural land.
10. Section 13 covers RAF Benson Safeguarding. This explains that areas of open water would be designed to mitigate bird strike hazard. A bird management plan is provided, and the section concludes that there would be no significant impacts on aerodrome safety.
11. Section 14 covers geology and geotechnical impacts. This confirms that the temporary extraction slopes would be stable for the period between excavation and backfilling.
12. Section 15 covers ecology and nature conservation, including details of ecological surveys, a tree survey and a biodiversity metric calculation. It includes details of mitigation measures including maintaining a 30-metre margin from the River Thames, retention of boundary features and a large part of the ditch in the north eastern part of the site. Specific mitigation measures for reptiles would be undertaken prior to soil stripping, lighting would be minimised to minimise impacts on bats. It concludes that the proposal would create new habitats following restoration and there would be biodiversity net gain.
13. Section 16 covers cultural heritage and archaeology. This concludes that it is unlikely that there is any unrecorded archaeology within the site. The Cultural Heritage assessment concludes that the proposed development and restoration scheme are likely to result in no significant impact upon the heritage assets within the Wallingford area.

14. Section 17 covers cumulative and combined effects, including in relation to new residential development in the area and New Barn Quarry. It concludes that there would be very few significant cumulative impacts on the local environment.
15. Section 18 concludes that the proposals have evolved in response to the technical work and environmental protection measures have been incorporated into the scheme design.

Regulation 25 Information

16. Further environmental information was requested and provided, following the first period of consultation.
17. Section 1 contains information on the need for sand and gravel and referenced the Local Aggregate Assessment 2021 (LAA 2021). It concludes that there is an increase in demand for aggregate and this site would assist in meeting the planned provision level to meet demand and deliver growth.
18. Section 2 contains further information on landscape. This confirms the intention to use straw bales and provides confirmation of the proposed bunds, root protection, vegetation to be retained, details of fill material (construction waste sourced from the local area). Figures are provided to show views to/from the AONBs, further information is provided on impacts on the River Thames and users of the Thames Path. An Arboricultural Assessment and a Landscape Masterplan is provided.
19. Section 3 contains an updated Transport Assessment, addressing the requests for further information. This includes the results of new traffic surveys and updated access drawings showing the highway extent. A new Road Safety Audit is provided and identifies no issues. The report concludes that the development is compliant with policy and there are no existing highway issues.
20. Section 4 contains additional ecological information, including that the Black Poplar tree will be retained, that no invasive plant species were found on site and clarification on the biodiversity metric calculation. A Proposed Habitat Plan is provided.
21. Section 5 contains a revised Flood Risk Assessment. This concludes that phases 1 and 2 are wholly within the functional floodplain and phase 3 is partly within it. However, sand and gravel working is water compatible. Hydraulic modelling has indicated no material change in flood extent and a negligible increase in off-site water levels. There is no need for flood storage compensation as land levels will be restored to existing or below. It sets out recommendations including ground levels to be no higher than existing, stockpiles to be located outside of floodplain, a Flood Response Plan, Excavation Method Statement and Drainage Plan to be developed and provided.

22. Section 6 covers the potential impact on private water supply. It includes mitigation measures, including the placement of clay overburden against the quarry face as a barrier between the extraction area and private water supply. It explains that it was not possible to access the well as the owner did not permit this. On the basis of the information available it concludes that the potential for the development to adversely affect the well is insignificant.
23. Section 7 covers further drainage information, as requested. This confirms that all surface water run off would be collected within the quarry sump and pumped to the silt lagoon prior to flowing into the clean water lagoon. An overflow would connect this to the ditch on the northern boundary.
24. Section 8 covers impacts on Elizabeth House day nursery and concludes that the outcome of the original assessment is unchanged.
25. Section 9 covers climate change. This states that the quarry would provide material close to the markets in south Oxfordshire which would reduce HGV movements associated with development around Wallingford. The restoration would ensure that run-off is properly managed and the additional tree and hedgerow planting would help offset climate change. It concludes that in the long term there would be a minor positive contribution to offsetting the wider effects of climate change.

Second Regulation 25 Request

26. Further documentation explaining the approach to flood modelling was provided, explaining the methodology that was used and addressing the risk of flooding off-site, confirming that the modelling demonstrates that any increase or decrease to risk is so negligible that is beyond the mathematical tolerance of the models.

Second Regulation 25 Consultation

27. The third Regulation 25 consultation was held because an updated set of application plans was submitted, following the identification of inconsistent plans in the previous consultation.

Annex 6 - European Protected Species

The Local Planning Authority in exercising any of their functions, have a legal duty to have regard to the requirements of the Conservation of Species & Habitats Regulations 2017 (as amended) which identifies 4 main offences for development affecting European Protected Species (EPS).

1. Deliberate capture or killing or injuring of an EPS
2. Deliberate taking or destroying of EPS eggs
3. Deliberate disturbance of a EPS including in particular any disturbance which is likely
 - a) to impair their ability –
 - i) to survive, to breed or reproduce, or to rear or nurture their young, or
 - ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or
 - b) to affect significantly the local distribution or abundance of the species to which they belong.
4. Damage or destruction of an EPS breeding site or resting place.

The habitat on and around the proposed development site and ecological survey results indicate that there is a low likelihood of European Protected Species (bats and otter) to be present.

It is considered that sufficient information has been submitted with the application which demonstrates that measures can be introduced which would ensure that an offence is avoided. The application is therefore not considered to have an adverse impact upon protected species provided that the stated mitigation measures are implemented.

Annex 7 – Full Consultation Responses from OCC Landscape Officer

Third Regulation 25 Consultation (July 2024)

1. In my previous consultation response I commented on the drawings in the Waste Recovery Plan, which includes previous versions of the Concept Restoration Plan (ref KD.WLF.D.010B in this document) and the Phasing Plan (ref KD.WLF.D.003 RevB), as well as other plans relating to phasing. I noted the limited information on levels (including the height of the straw bale barrier), the lack of information on internal access points/circulation areas between phases, and the concept restoration potentially delivering fewer ecological benefits. No further information has been provided on these points.
2. The latest revision of the Conceptual Restoration Plan v3 includes less agricultural land, which is an improvement to the previous version (V2).
3. The latest revisions of the plans don't change my previous advice and my previous comments still apply. It is important that the comments of the Council's ecological officer are also taken into account.

Second Regulation 25 Consultation (April 2024)

4. The following comments should be read in conjunction with my previous comments and those of my colleagues and other interested parties.
5. I have the following observations on the Waste Recovery Plan:
 - the phasing plans and concept restoration plans within the Waste Recovery Plan include limited information on levels. Information on the height of storage bunds is provided in the notes but not for the strawbales. Information on this should be included on the drawings.
 - the phasing plans don't show internal access points between phases to help understand how excavation and restoration is achieved without disturbing the existing vegetation or the Restored Land areas (e.g. for phase 3). This information should be provided.
 - the Concept Restoration Plan (dwg KD.WLF.D.010B) no longer includes scrapes/shallow pools providing fewer ecological and landscape benefits. It is important that the restoration seeks to achieve significant enhancements.
 - the phasing drawings state under 5) that all restored land will be managed under a 5-year aftercare period before being handed back to the landowner. As mentioned previously, long-term management is required to ensure the proposed restoration habitats get established and deliver the envisaged ecological and landscape benefits. It is my understanding that long-term management of 30-years is required from a biodiversity gain point of view. The County ecologist should be consulted on this.

- I note from the District Council comments that the plans might not accurately show the Root Protection Areas (RPA). I recommend that the Council's tree officer is consulted.

Supplementary comments to my previous response:

6. Following my previous response I have been made aware that the noise assessment submitted as part of the application does not suggest a significant increase in noise levels on receptors in the area. This is also reflected by the Environmental Health Officers' comments, who is not objecting to the scheme.
7. Tranquillity is 'a state of calm and quietude' and not just about noise levels, however, noise is a contributing factor. I accept that the operational noise will be lower than I had envisaged and therefore that selected receptors, especially on those further away, will be less affected.
8. As such I consider that effects on tranquillity of the Chilterns National Landscape (Chilterns NL) would be limited to nearby areas that also offer some level of visibility of the site such as the River Thames corridor and locations on the eastern bank of the river (e.g. St. John the Baptist).
9. The information does not materially change my view about effects on tranquillity on receptors within or in close proximity of the site.
10. It should be noted that no visualisations were submitted as part of the application. SODC mentioned the lack of photomontages in their comments (Oct '21). I, like the applicant and others have based my judgements on the information in front of me and my knowledge of the locality. However, photomontages or wireframe images for selected viewpoints (e.g. the Thames Path, Nosworthy Way, Reading Road) usually form part of an Environmental Statement (GLVIA3, TGN 06/19), and planning committee members might find these helpful in the decision-making process in the light of differing views.
11. It should also be noted, that the recently passed Levelling Up and Regeneration Act 2023 (Section 245) has placed a strengthened 'duty to further' the statutory purposes of the National Landscapes on local authorities. This replaces the previous 'duty of regard' local authorities had under Section 85 of the Countryside and Rights of Way Act 2000.
12. It is anticipated that the government will provide further guidance on how this duty should be applied, however, interim advice from Natural England is that the duty has been strengthened, and that it is an active duty rather than a passive one. This means that developments are not only required to avoid and mitigate effects but to explore what can be done in addition, to further the purposes and qualities of the National Landscape.
13. This is of relevance to this development in so far that the site directly adjoins the Chilterns NL. It is therefore important that adverse effects on the river corridor and the Thames Path are not only avoided or mitigated, but that these characteristic elements are actively enhanced in the restoration.

14. The information discussed above does not materially change my previous comments. As previously stated, the development would introduce quarrying into an area that I consider sensitive in landscape and visual terms due to its location adjacent to the Chilterns NL, the River Thames and the Thames Path National Trail. The proposal would cause adverse landscape and visual effects, including adverse effects on the Thames Path, the River Thames Corridor and the Chilterns NL and its setting.
15. I recognise that these effects would be temporary and that the site would be progressively restored to biodiversity and landscape, which is a mitigating factor in LVIA terms. However, I don't consider this to justify the impacts, and judge the development not to meet the requirements of national and local planning policy. My previous recommendation still applies.
16. Conditions covering the following aspects will be required should the development be approved:
- Construction Environmental Management Plan (CEMP)
 - Retention of existing vegetation - I assume that conditions suggested by the County's Arboricultural Officer will cover this
 - Lighting
 - Mitigation planting and bunding
 - Details on treatment of the eastern excavation boundary with the Thames Path
 - Detailed Restoration Plan
 - Landscape Management Plan - This can usually be combined with a Landscape and Ecological Management Plan condition put forward by my ecology colleagues
 - Aftercare scheme
 - Long-term management

Regulation 25 Consultation (June 2022)

17. Objection
18. The key landscape planning policies and landscape character context are outlined in my previous comments, which should be read in conjunction with these comments.
19. 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.
20. Tree survey and Arboricultural 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.

21. 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.
22. 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.
23. 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.
24. 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.
25. 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.
26. Mitigation Measures - The additional information includes further detail on the mitigation measures proposed in the LVIA:
27. 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.
28. 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.
29. 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.

30. 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.
31. 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.
32. 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.
33. 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.
34. 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.
35. 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.
36. 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.
37. 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.

38. 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.
39. 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.
40. 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.
41. 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.
42. I note that the information suggests a maintenance period for five years. A longer-term management will be required for habitats associated with achieving Biodiversity Net Gain.
43. 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.
44. 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.

45. 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.
46. 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.
47. 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.
48. 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.
49. 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.

50. 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.
51. Based on the above I consider overall sensitivity levels of the site to be high rather than medium.
52. The LVIA considers the overall magnitude of impact on the landscape character of the site to be medium adverse during operation (table 2).
53. 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.
54. 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.
55. 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.
56. 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.
57. implementation and long-term management of habitat, i.e. 25+ years, which would need to be secured should the development be approved.
58. 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.

59. • 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.
60. 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.
61. 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 (e.g. 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.
62. • Users of the River Thames (VP1/6):
63. The LVIA assess users of the river as medium sensitive and the magnitude as low resulting in a slight adverse effect.
64. 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.
65. 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.
66. • Users of Nosworthy Way at the River Thames Bridge (VP 4/24)
67. 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.

68. 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.
69. 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.
70. • 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.
71. • 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.
72. • 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.

73. 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.
74. 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.
75. 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.
76. 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.
77. 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: 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. ... Adverse impacts might not be visual. The special qualities of the Chilterns AONB include tranquillity. A development which is noisy may well impact adversely on tranquillity even if not visible from the AONB."
78. 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.
79. 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.

80. 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:
81. “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).
82. 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.
83. 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.
84. 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.
85. 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.
86. 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:
87. “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).

88. 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.
89. 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.
90. 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.
91. 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".
92. 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."
93. 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.
94. 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.

95. 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.
96. 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.
97. 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.
98. SOLP Policy ENV1 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."
99. 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.
100. 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.
101. 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.
102. 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.

103. 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.

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

Initial Response Consultation (June 2022)

105. Objection

106. 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.

107. 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.

108. 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.

109. 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.

110. 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).

111. 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.

112. 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.
113. 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.
114. 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 (e.g. 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.
115. 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.
116. 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.
117. 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.
118. 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).

119. 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.
120. 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.
121. 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).
122. 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 land use 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.
123. 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.
124. 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.
125. 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.

126. 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.
127. 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.
128. I therefore do not consider these to be an effective measure in mitigating adverse effects on users of the Thames Path and the AONB.
129. 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.
130. 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.
131. 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.
132. 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 e.g. through operational noise and increases in HGV traffic.
133. 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.
134. 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.

Annex 8 – Sequential Test

Introduction

1. The National Planning Policy Framework (NPPF) paragraph 167 states that a sequential, risk-based approach should be taken to the location of development, taking into account all sources of flood risk and the impacts of climate change. The sequential test should be applied. Paragraph 168 confirms that the aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.
2. NPPF paragraph 173 states that where appropriate, applications should be supported by a site-specific flood risk assessment. Development should only be allowed in areas at risk of flooding where, in light of this assessment (and the sequential and exception tests as applicable) it can be demonstrated that: within the site, the most vulnerable development is located in the areas of lowest flood risk, unless there are overriding reasons to prefer a different location, the development is appropriately flood resilient, it incorporates sustainable drainage systems, residual risk can be safely managed and safe access and escape routes are included where appropriate, as part of an agreed emergency plan. The exception test does not apply as sand and gravel working is classified as 'water compatible' development in Annex 3 to the NPPF. NPPG Table 2 (Paragraph: 079 Reference ID: 7-079-20220825) confirms that the exception test is therefore not required.
3. OMWCS policy C3 states that development will, wherever possible, take place in areas with the lowest probability of flooding and that where development takes places in an area of identified flood risk this should only be where alternatives in areas of lower flood risk have been explored and discounted, using the sequential test and exception test as necessary and where a flood risk assessment is able to demonstrate that the risk of flooding is not increased from any source.
4. As part of the application site falls within Flood Zones 2 and 3 and the site has not previously been sequentially tested through a development plan allocation, it is necessary to undertake a sequential test exercise to establish whether there is an alternative site in an area of lesser flood risk which could accommodate the proposed development and also to establish whether the most vulnerable development is located in the areas of lowest flood risk within the site.

5. NPPG paragraph 030 (Reference ID: 7-030-20220825) states that, 'planning authorities should apply the sequential approach to the allocation of sites for waste management and, where possible, mineral extraction and processing. It should also be recognised that mineral deposits have to be worked where there is no scope for relocation (and sand and gravel extraction is defined as 'water-compatible development' in the NPPF Annex 3, acknowledging that these deposits are often in flood risk areas). However, mineral working should not increase flood risk elsewhere and needs to be designed, worked and restored accordingly. Mineral workings can be large and may afford opportunities for applying the sequential approach at the site level. It may be possible to locate ancillary facilities such as processing plant and offices in areas at lowest flood risk. Sequential working and restoration can be designed to reduce flood risk by providing flood storage and attenuation. This is likely to be most effective at a strategic (county) scale.'
6. The NPPF paragraph 168 indicates that the Local Planning Authority Strategic Flood Risk Assessment (SFRA) will provide the basis for applying the Sequential Test. Oxfordshire County Council Minerals and Waste Level 1 Strategic Flood Risk Assessment was published in August 2015.

Potential Alternative Sites

7. Local Plan evidence base documents have been used to identify possible alternative sites. The sand and gravel sites nominated for inclusion in the Part 2 plan, whilst it was still in the process of preparation, were listed and sites which had since been granted planning permission, or sites for which the nomination had been withdrawn, were removed from the list prior to work commencing on the sequential test.
8. The full list of sand and gravel sites assessed including details of their yield is set out in Table 1.
9. The proposed quarry would provide approximately 550 000 tonnes of sand and gravel. Sites containing a significantly (25% or more) lower yield were eliminated at stage 1 of the sequential test. Therefore, only sites with 412 500 tonnes or more potential yield were taken forward for further assessment.

Table 1

Site Name and Location	Site Nomination Ref.	Estimated Yield (tonnes)	Comparable yield?
Land adjacent to Benson Marina	SG-03	70 000	No
Land at Lower Road, Church Harborough	SG-08	250 000	Yes
Land north of Drayton St Leonard	SG-09	4 500 000	Yes
Land South of Chazey Wood, Mapledurham,	SG-12	3 000 000	Yes
Land at Shillingford	SG-13	5 300 000	Yes
Dairy Farm, Clanfield	SG-15	5 40 000	Yes
Land at Culham	SG-17	400 000	No
Bridge Farm, Appleford	SG-19	500 000	No
Land between Eynsham & Cassington	SG-20	1 500 000	No
Wharf Farm, Cassington	SG-20a	1 600 000	No
Land at Eynsham	SG-20b	1 900 000	Yes
Sutton Farm, Sutton	SG-29	5 000 000	Yes
New Barn Farm, South of Wallingford	SG-33	4 000 000	Yes
Land at Friars Farm, Stanton Harcourt	SG-36	400 000	No
Land at Grandpont	SG-37	1 500 000	Yes

North of Lower Radley	SG-41	1 500 000	Yes
Chestlion Farm, Clanfield	SG-58	500 000	Yes
Manor Farm, Clanfield	SG-58a	12 000 000	Yes
Stadhampton	SG-59	1 000 000	Yes
White Cross Farm, Wallingford	SG-60	500 000	Yes
Appleford, Didcot,	SG-62	1 100 000	Yes

10. As shown in Table 1, following the elimination of sites which could not provide a comparable yield, there were 15 potential alternative sites remaining:

1. SG08 Land at Lower Road Church Hanborough
2. SG09 Land North of Drayton St Leonard
3. SG11 Land north east of Sonning Eye (Caversham phases D and E)
4. SG12 Land South of Chazey Wood
5. SG13 Land at Shillingford
6. SG15 Dairy Farm, Clanfield
7. SG20 Land between Eynsham & Cassington
8. SG20a Wharf Farm, Cassington
9. SG20b Land at Eynsham
10. SG29 Sutton Farm
11. SG37 Land at Grandpont
12. SG41 North of Lower Radley
13. SG58 Chestlion Farm
14. SG58a Manor Farm Clanfield

11. Flood Risk status was categorised using a Red, Amber, Green (RAG) approach, as used in the Oxfordshire Minerals and Waste Plan Background Paper: Flooding and Minerals, to enable a comparative appraisal of flood risk at different sites. The criteria for the RAG approach was as follows:

- RED: up to 25% deliverable area in Flood Zone 1 (FZ 1) and more than 75% deliverable area in Flood Zone 3 (FZ 3).

- AMBER: 20-50% deliverable area in Flood Zone 1 (FZ 1) and 30-75% deliverable area in Flood Zone 3 (FZ 3).
- GREEN: more than 50% in Flood Zone 1 (FZ 1) and less than 30% in Flood Zone 3 (FZ 3).

12. Not all of the sites fit neatly into these three categories. Where a site does not fit any of the definitions exactly the RAG rating has been assigned on the basis of the percentage of land in flood zone 3 and this has been noted.
13. For the application site, the percentage of the application area in each flood zone was not provided in the Flood Risk Assessment. This information has been provided by the applicant by email.

Table 2

	Site	Site Ref	% FZ1	% FZ2	% FZ3	RAG
1.	Land at Lower Road Church Hanborough	SG-08	66.63	1.91	31.46	Amber (on basis of FZ3)
2.	Land North of Drayton St Leonard	SG-09	52.24	19.39	28.37	Green
3.	Land north east of Sonning Eye (Sonning Quarry phases D and E)	SG-11	0	3.75	96.25	Red
4.	Land South of Chazey Wood	SG-12	0	8.18	91.83	Red
5.	Land at Shillingford	SG-13	42.47	45.59	11.94	Green (on basis of FZ3)
6.	Dairy Farm	SG-15	40.46	8.71	50.84	Amber
7.	Land between Eynsham & Cassington	SG-20	0.43	1.52	98.05	Red
8.	Wharf Farm, Cassington	SG-20a	0.57	3.76	95.67	Red
9.	Land at Eynsham	SG-20b	0	9.37	90.63	Red
10.	Sutton Farm	SG-29	43.9	8.33	47.77	Amber
11.	Land at Grandpont	SG-37	0.81	1.45	97.74	Red
12.	North of Lower Radley	SG-41	25.09	6.29	68.62	Amber
13.	Chestlion Farm	SG-58	94.29	0.67	5.04	Green

14.	Manor Farm Clanfield	SG-58a	65.4	6.16	28.43	Green
	Application site – White Cross		16%	6%	78%	Red

14. Following the assessment of potential alternative sites against flood risk status, it can be seen that none of the sites have a higher flood risk than the application site, because the application site has itself been scored as red. Therefore, none of the sites can be eliminated as potential alternatives and all 15 sites need further consideration.

Further Assessment

15. There is no certainty that any of the potential alternative sites identified in Table 2 above are capable of being delivered. Only SG-11 is the subject of a current planning application, however this is not ready to be determined and a higher proportion of SG-11 lies in flood zone 3, compared to the application site so it can be eliminated on that basis.
16. There is a current application for an extension to Gill Mill Quarry. It would provide an additional 1 million tonnes, which is therefore a comparable yield. A significant proportion of the Gill Mill site is in Flood Zone 1, and approximately half is in Flood Zone 2, therefore it is in an area of lower flood risk than the application site. This site was not identified through the process above as the area had previously been excluded from applications at Gill Mill due to the proximity to a SSSI which is sensitive to changes to the hydrological regime and has not been nominated as a potential site. There is an outstanding Natural England objection to the planning application and further information has been requested to allow the impacts on the SSSI to be fully assessed.
17. None of the other sites listed in the table above have been the subject of a planning application and so would first have to go through the planning process. It typically takes months to years for an applicant to compile a new planning application and the Environmental Impact Assessment for a large minerals development. Ecological survey work can often only take place at certain times of year and data from a number of years of groundwater monitoring work can be required. It would then typically take a number of months to determine an application of this type after it has been submitted by the applicant. Therefore, it is considered that the potentially

alternative sites would not be capable of providing a genuine alternative to the application site, as they could only be provided on a different timescale.

18. The extension to Gill Mill Quarry could potentially be delivered on a comparable timeframe as the application site, as there is an application in the system for it. It has a comparable yield and is in an area of lower flood risk. Therefore, it is considered that there is a potential alternative site and the sequential test is not passed.

Conclusions

19. Having considered the constraints on the potentially available alternative sites, it is concluded that the alternative extraction sites identified cannot be demonstrated to be capable of delivery within the same timescale as the application site. In addition, further assessment work is needed in each case and should this work be undertaken in the future it is possible it could find the alternative sites to be unsuitable, or significantly reduce the area of the site which could be worked.
20. The application site fails the sequential test; there is at least one reasonably available site appropriate for the proposed development in areas with a lower probability of flooding; the proposed extension area at Gill Mill Quarry.