

For: PLANNING & REGULATION COMMITTEE – 7 SEPTEMBER 2020

By: ASSISTANT DIRECTOR FOR STRATEGIC INFRASTRUCTURE AND PLANNING

Development Proposed:

Planning Application to allow the development of an offline River Thames marina basin with fixed and floating pontoon moorings for approximately 280 boats, slipway, secure and public car parking, refuelling and pump-out dock, refuse and recycling area, marina office and café, toilet and shower block and laundry facilities, boat hire building, picnic and barbeque area, open water area, circular footpath, boat workshop, new footbridge and creation of new grazing marsh, grassland, pond, reedbed and wet woodland habitat with a construction phase involving the extraction and processing of sand and gravel, the importation of inert fill and the construction of new site accesses, landscaping and screening bunds.

Division Affected: Cholsey and Wallingford South

Contact Officer: Catherine Kelham **Tel:** 07824 545378

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

OCC Application No: MW.0033/18

SODC Application No: P18/S1641/CM

District Council Area: South Oxfordshire District Council

Applicant: London Rock Ltd

Application Received: 9 May 2018

Consultation Period: 24 May 2018 - 15 June 2018
23 January 2020 – 23 February 2020
6 August 2020 – 8 September 2020

Contents

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

RECOMMENDATION

Subject to no additional material comments being received by the completion of the consultation period, it is recommended that application no. MW.0033/18 for Planning Application to allow the development of an offline River Thames marina basin with fixed and floating pontoon moorings for approximately 280 boats, slipway, secure and public car parking, refuelling and pump-out dock, refuse and recycling area, marina office and café, toilet and shower block and laundry facilities, boat hire building, picnic and barbeque area, open water area, circular footpath, boat workshop, new footbridge and creation of new grazing marsh, grassland, pond, reedbed and wet woodland habitat with a construction phase involving the extraction and processing of sand and gravel, the importation of inert fill and the construction of new site accesses, landscaping and screening bunds be REFUSED for the following reasons:

- 1) There is no identified need for a 280 berth marina of which 80% of the moorings would be for permanent moorings. The development is therefore contrary to saved policy R9 of the South Oxfordshire Local Plan 2011, policy CSS1 of the South Oxfordshire Core Strategy 2012 and policy ENV4 of the South Oxfordshire Local Plan 2034.
- 2) The proposed development would constitute a dramatic land-use change that is both discordant with the landscape character of the area and detracts from the open and undeveloped countryside setting of the River Thames and Chilterns AONB. It is therefore contrary to policies CSEN1 of the South Oxfordshire Core Strategy 2012, C4 and C8 of the Oxfordshire Minerals and Waste Local Plan – Part 1 Core Strategy and C3 of the South Oxfordshire Local Plan 2011.
- 3) The development would harm the setting of listed buildings and the public benefit of the development is not considered to outweigh that harm. It is therefore contrary to policies CON5 of the South Oxfordshire Local Plan 2011, CSEN3 of the South Oxfordshire Core Strategy 2012 and C9 of the Oxfordshire Minerals and Waste Local Plan – Part 1 Core Strategy and Section 66(1) of the Listed Buildings and Conservation Areas Act 1990.
- 4) The development is not considered to be a well-designed place and does not accord with policies D1 of the South Oxfordshire Local Plan 2011 or policy CSQ3 of the South Oxfordshire Core Strategy 2012.
- 5) There would be a loss of Best and Most Versatile agricultural land contrary to policy C6 of the Oxfordshire Minerals and Waste Local Plan – Part 1 Core Strategy.
- 6) The accessibility of the site for non-vehicular modes is not considered to comply with policies T1 of the South Oxfordshire Local Plan 2011 and TRANS 2 of the South Oxfordshire Local Plan 2034.
- 7) It has not been demonstrated that the development would not have an unacceptable impact on air quality, pollution and human health contrary to elements of policy EP1 of the South Oxfordshire Local Plan 2011 OLP and policy C5 of the OMWCS
- 8) It has not been demonstrated that the development would not have an unacceptable impact on highway safety nor a severe impact on the road network

contrary to policies T1 of the South Oxfordshire Local Plan 2011, CMS1 of the South Oxfordshire Core Strategy 2012 TRANS 2 of the South Oxfordshire Local Plan 2034 and paragraph 109 of the National Planning Policy Framework.

- 9) It has not been demonstrated that the development would not have an unacceptable impact on groundwater contrary to policies C4 of the Oxfordshire Minerals and Waste Local Plan – Part 1 Core Strategy and policy SP7 of the South Oxfordshire Local Plan 2011.**
- 10) It has not been demonstrated that the development would not have an unacceptable impact on the enjoyment of existing recreational users of the river though additional water traffic generation and is contrary to policy R4 of the South Oxfordshire Local Plan 2011.**

PART 1- FACTS AND BACKGROUND

Location (see Site Plan Annex 1)

1. The application site is located approximately 1.5km to the south of Wallingford town centre within the South Oxfordshire District in the south east part of Oxfordshire County. It is approximately 20km south east of Oxford and approximately 18km northwest of Reading.

Site and Setting (see Plans Annex 2)

2. The application site covers an area of 19 hectares. 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, intensively farmed landscape overlying river gravel terraces.
3. The site itself is used as grazing land and there is a derelict barn in the central west section. It is not considered to be Best and Most Versatile (BMV) Agricultural Land
4. The majority of the site lies within flood zones 2 and 3. A drainage ditch runs north-south through the site and a second drainage ditch in the north-eastern part of the site discharges into the River Thames.
5. The site is not within either the Chilterns AONB or the North Wessex Downs, though the Chilterns AONB abuts the site as it incorporates the River Thames which runs along the eastern boundary of the application site. The North Wessex Downs AONB is approximately 1.6km to the west and 2.3 km to the south.
6. On the opposite riverbank to the application is Mongewell Park, part of the former Carmel College. There are three Grade II (Former Church of St John the Baptist, Jewish Synagogue at former Carmel College and Amphitheatre at former Carmel College) and one Grade II* (Julius Gottlieb Gallery and Boathouse at former Carmel College) listed buildings within the estate grounds. To the west of the site on Reading Road is a Grade II listed milestone.
7. Along the eastern edge of application site (alongside the River Thames) is part of the Thames Path National Trail that runs from Kemble in Gloucestershire to the Thames Barrier in South East London.
8. The river itself in this area 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 Loch.
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.

12. The closest residential property is Winward House, approximately 80 metres south of the application site. 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). Planning permission has also been granted for residential development in the grounds of the former Mongwell Park on the opposite bank.
13. The site is approximately 3km south west of RAF Benson.
14. Planning permission was granted in 2014 by South Oxfordshire District Council for the redevelopment of the former Carmel College site to provide 166 residential dwellings (C3) and other elements (Application reference: P11/W2357)
15. To the west of the site, beyond the solar farm development, planning permission has been granted for mineral extraction at New Barn Farm.

Planning History

16. There is no recent planning history on the site.
17. Several planning applications were made 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
 - P77/W0190/E - Use for general dealing in incl. buying and dealing in hay, straw, tractors, JCB's 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
 - SO/W/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

Details of Proposed Development

Overview

18. The proposed development seeks to create a 280 berth marina and associated amenity buildings, infrastructure and landscaping. This would involve mineral extraction and the importation of inert clay material to create an engineered basin adjacent to the existing river and on land operational development. The basin would have a permanently open connection to the River Thames.

Mineral Extraction

19. It is proposed to extract around 550,000 tonnes (340,000m³) of River Terrace Sand and Gravel reserves and around 180,000 m³ of soils and overburden alluvial clay from the site. The proposed extraction area would measure 15.5 ha.
20. It is anticipated the sand and gravel deposits are between 2 to 4 metres thick. The site

would be dewatered as necessary to work the materials in a 'dry state'. It is proposed that extracted water would be pumped through settlement lagoons and discharged off-site into the River Thames (subject to a permit from the Environment Agency).

21. Mineral extraction would take place in five phases over a period of four years with an output of around 140,000 tonnes per annum. Material would be excavated from a single face using excavators and transported across the site in dumper trucks. It would be washed and screened on site.
22. A number of building, plant and other structures associated with the mineral working are proposed. This includes office, welfare facilities, workshop, weighbridge, silt lagoon, wheel wash and processing plant (including a silt thickener plant. These would be temporary and on site for the duration of the mineral working. They would be located in the northwest part (Phase A- Plant Area) of the development site close to Nosworthy Way (A4130) and Reading Road (A4329). Parking for eight HGVs would also be provided within the plant area.
23. The officers, welfare facilities and workshop are proposed to be 'portakabin' type buildings.
24. To facilitate the mineral extraction it is proposed to provide a new site entrance off Reading Road (A4329) and a new exit off the site on to Nosworthy Way (A4130). Vehicles would turn left into and left out of the site.
25. Internal haul roads would be constructed of imported hard-core materials. The plant area would be constructed on an apron of re-in forced concrete. The site entrance would be surfaced with asphalt for 30 metres. A ramp would be required to raise the exit road to the level of Nosworthy Way (A4130). This would be constructed using compacted granular full and surfaced with road planings until 30 metres from the site exit. The last 30 metres would be level with Nosworthy Way and surfaced with asphalt.
26. No workings are proposed to take place within a 30 metres margin of the River Thames.
27. There would be an estimated maximum of 50 HGVs in and 50 HGVs out of the site each day during the mineral extraction and backfilling operations.
28. The proposed hours of operation for the mineral extraction are 7am-6pm Mondays to Fridays and 7am-1pm on Saturdays with no working on Sunday or Bank/Public holidays.
29. It is proposed to provide external lighting around the site offices, plant and workshop area. It is proposed that low level lighting around the offices would remain on during the hours of darkness.
30. Approxi mately ten persons are anticipated to be employed at the site during the mineral extraction works.

Marina Construction

31. To create the marina basin, following mineral extraction the site would be partially backfilled and sculpted to form the landform proposed. This would be akin to 'rolling restoration' type works as the basin liner construction and backfilling is proposed to progress behind the mineral extraction. Inert clay material would be imported to the site for lining purposes
32. Topsoil
and subsoil not required for the creation of a marina scheme would be exported from the site.
33. The marina basin would be around 7.9 hectares in area (including the areas where reedbed planting is proposed to be created).
34. A small outflow would be created in the southern part of the marina basin to allow flood water to leave the site downstream of the marina entrance.
35. Following the extraction of material it is anticipated that to complete the marina infrastructure and landscaping works an additional year will be required (bringing the total construction phase time to 5 years).
36. At the completion of construction of the marina basin, the exit on to the A4130 (Nosworthy Way) would be closed and removed.

Marina Operation

37. The
marina would contain five floating pontoons designed to cater for varying size of water craft including narrow boats and larger river cruisers. The pontoons would be fixed to steel pipes installed into the base of the marina.
38. Of the 280 berths provided, up to 20% would be for visitors. The remaining berths (upwards of 224) would be leisure moorings (i.e. permanent moorings for boats whilst not in use). No residential moorings (i.e. permanent moorings for boats whilst in use) are proposed. A dedicated mooring would be provided within the main marina area with level access to allow wheelchair users to easily access a boat moored in this location.
39. Access between the River Thames and marina would be located approximately 150 metres south of the Winterbrook Bridge (A4130 Wallingford Bypass - Nosworthy Way) in the north-eastern part of the development area via a 10 metre wide channel.
40. Vehicular access to the marina would be via a new T-junction from the Reading road (A4329) (approximately 100 metres south of the junction with Nosworthy way (A4130)) in the northwest section of the site.
41. Several new buildings are proposed as part of the marina development. Indicative dimensions and form have been submitted as part of the application. The applicant has stated that detailed dimensions and designs of the buildings would be submitted for approval prior to the construction commencing.
42. The main marina building would be located in the western part of the site, close to the site entrance. Indicative dimensions suggest it would be 50 metres in length and 22.5 metres in width with a hipped pitched roof (eaves height 3.5 metres and ridge height of 6.5 metres). On the front (water facing) east elevation an outdoor patio measuring 8 metres by 26 metres would be provided. This building would contain a marina office, café/restaurant area, toilets, showers, laundry facilities, a shop and storage areas.

43. In the north part of the marina, a slipway, refuse collection area and out of water work space for up to two boats and a workshop building are proposed. A service dock area with refuelling and pump-out facilities would be also be provided in this area. Indicative dimensions indicate the workshop building would measure around 24 metres by 24.5 metres with a gable roof (ridge height approximately 10 metres).
44. The southern part of the development would be designed for the hire of non-motorised watercraft and open to the public. This area would be separated from the boat moorings by a landscaped berm. A Watercraft Hire Centre building and Facilities building is proposed as well as a beach for water access. Indicative dimensions indicate the Hire Centre building would measure 6 metres by 11 metres with an eaves height of 3.5 metres and ridge height of 5.5 metres. Indicative dimensions indicate the facilities building would be 8 metres in length and 4 metres in with an eaves height of 3 metres and ridge height of 5 metres. Both buildings are indicated to have pitched roofs.
45. Separate car parking for berth holders and visitors would be provided. For berth holders there would be 130 spaces (i.e. one car parking space for every two berths). There would be a further 90 spaces for visitors and the public. The total number of car parking spaces would be 220 and include spaces for disabled visitors close to the facilities and moorings.
46. Several landscaped/habitat areas are proposed. This includes a pond and area of wet woodland measuring approximately 0.3 hectare in the southwest of the site, an area of grassland measuring approximately 1.6 hectares in the south east of the site, reed bed planting around the north boundary, east boundary and northwest corner and a total of approximately 3 hectares of floodplain grazing split between the northern edge of the marina, in the northeast corner of the site and the 30 metres buffer strip between the marina basin and River Thames.
47. Low level external lighting around the facilities building, access walkways, moorings and pontoons is proposed. This would remain on during the hours of darkness.
48. Eight people would be permanently employed at the marina during the majority of the year.
49. The areas accessible by the public would be separated from areas accessible by boat owners by landscape, fencing and hedges.
50. A barrier would be installed on the main access road within the marina to restrict access to the boat owner area. CCTV surveillance cameras would also be installed on the site.

Footpaths

51. A circular footpath, making use of the Thames Path National Trail along the river, would be provided around the site.
52. Where the marina entrance crosses the Thames Path National Trail, a new foot bridge would be provided. This would have a minimum width of two metres and be 170 metres in length to accommodate a gentle slope (1v:20h) so to be accessible for all users (in accordance with the Equalities Act requirements). At its maximum height, the bridge would be 5.1 metres about the mean River Thames water level.
53. The footbridge would be constructed using a series of piled steel legs to support a steel deck. The sides of the bridge would be constructed using open steel barriers 1.8 metres in height.

Environmental Impact Assessment

54. 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 3.
55. Further information was submitted pursuant to the Environmental Statement and has been consulted on and assessed as part of determining this application.

PART 2 – OTHER VIEWPOINTS

56. There were three periods of public consultation.
57. The full text of the consultation responses can be seen on the e-planning website¹, using the reference MW.0033/18. These are also summarised in Annex 4 to this report.
58. The application is being reported to this Committee as it is EIA development. It has also received objections from members of the public and consultees.
59. Twenty-five representations from members of the public were received. Fourteen of these object to the proposed development, eight are in support and the remaining three are considered to be of neutral stance. The points raised are summarised below. The points raised are covered in Annex 5.

PART 3 – RELEVANT PLANNING DOCUMENTS

60. 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

The Development Plan for this area comprises:

- Oxfordshire Minerals and Waste Local Plan Part 1: Core Strategy (OMWCS)
 - Saved Policies of the Oxfordshire Minerals and Waste Local Plan 1996 (OMWLP)
 - South Oxfordshire Core Strategy adopted December 2012 (SOCS)
 - Saved Policies of the South Oxfordshire Local Plan 2011 (SOLP)
61. 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.
 62. 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. They are due to be replaced on the adoption of Oxfordshire Minerals and Waste Local Plan Part 2: Site Allocations. The saved policies are site-related

¹Click here to view application [MW.0033/18](#)

policies and none of them apply to the area proposed in this planning application. Therefore, they are not relevant to the determination of this planning application.

63. Some policies of the **South Oxfordshire Local Plan 2011** (SOLP) were saved following the adoption of SOCS in 2012. A number were also unsaved in 2008 following direction from the Secretary of State and the publication of the first NPPF.

Emerging Plans

64. Work on the **Oxfordshire Minerals and Waste Local Plan Part 2: Site Allocations** (OMWSA) is progressing. This plan will allocate sites required to provide the additional capacity for minerals supply and waste management as set out in the adopted core strategy. The Regulation 18 Preferred Options consultation closed on 4th April. Subject to the outcome of this consultation, it is anticipated that the final draft Plan will be submitted later in 2020. It will then be subject to an examination in public before adoption. Although work has commenced on OMWSA, it is at a relatively early stage and the weight that can be given to the emerging plan in decision making is very limited.
65. The **South Oxfordshire Local Plan 2034** (SOLP2034) was submitted to the Secretary of State on Friday 29 March 2019 for independent examination. On 9th October 2019, the Secretary of State exercised his power under Section 21A of the Planning and Compulsory Purchase Act 2004 and directed the Council (temporary direction) not to take any steps in connection with the adoption of the emerging Local Plan 2034 while he considers and decides on the next steps. Following discussions between South Oxfordshire District Council representatives and officials from the Ministry of Housing Communities and Local Government (MHCLG), the Secretary of State sent a [letter to Cllr Sue Cooper](#), Leader of South Oxfordshire District Council, on 3 March in which he stated he is using government powers in Section 27 of the Planning and Compulsory Purchase Act 2004 and directing the council to progress the plan through examination to be adopted by December 2020 and for senior council officers to report monthly to MHCLG officials on progress of the plan. An updated draft schedule of proposed modifications to the Plan was made on 6th July 2020 and the Examination in Public Hearing commenced on 14th July 2020. In summary, as the South Oxfordshire Local Plan 2034 has not yet completed independent examination, been found sound or adopted, it is currently considered to carry limited weight.

Other Policy Documents

66. The **National Planning Policy Framework** (NPPF) was first published in 2012 and revised in July 2018 with minor further revisions made in February 2019. This is a material consideration in taking planning decisions. 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.
67. The **National Planning Policy Guidance** (NPPG) contains specific advice on matters including flood risk, minerals, conserving and enhancing the historic environment, determining a planning application and natural environment.
68. There is no neighbourhood plan affecting the site area.

Relevant Development Plan Policies

69. The OMWCS most relevant to this development are:

PN7

- M2 – Provision for working aggregate minerals
- M3 – Principal locations for working aggregate minerals
- M8 - Safeguarding mineral resources
- C1 – Sustainable development
- C2 – Climate Change
- C3 – Flooding
- C4 – Water environment
- C5 – Local environment, amenity and economy
- C6 – Agricultural land and soils
- C7 – Biodiversity and Geodiversity
- C8 – Landscape
- C9 – Historic environment and archaeology
- C10 – Transport
- C11 – Rights of way

70. The SOLP saved policies most relevant to this development are:

- G2 – Protection and enhancement of the environment
- G4 – Development in the countryside and on the edge of settlements
- C3 – The River Thames and its valley
- C6 - Biodiversity conservations
- C9 – Landscape features
- CON5 – The setting of listed buildings
- EP1 – Prevention of Polluting emissions
- EP2 – Noise and Vibrations
- EP3 – Light Pollution
- EP6 - Surface water protection
- EP7 - Ground water protection
- D1 - Good design and local distinctiveness
- D2 - Vehicle and bicycle parking
- D7 – Access for all
- R4 - Recreation in the Countryside
- R8 - Public Rights of Way
- R9 – River Thames
- E5 – General employment policies
- TSM1 - General approach to tourism
- TSM2 - Tourist attractions and facilities
- T1 – Transport requirements for new development
- T2 – Parking and Circulation space provision

71. The SOCS policies most relevant to this development are:

- CS1 - Sustainable Development
- CSS1 – The Overall Strategy
- CSM1 - Transport
- CSEN1 - Landscape
- CSEN3 – Historic Environment
- CSQ2 – Sustainable Design and Construction
- CSQ3 - Design
- CSG1 – Green Infrastructure
- CSB1 – Conservation and improvement of Biodiversity

- CSEM1 – Supporting a Successful and Thriving Economy
- CSR2 – Employment in Rural Areas

Relevant Emerging Plan Policies

72. The emerging SOLP2034 draft policies most relevant to this development are:
- EMP11 – Development in the Countryside and Rural Areas
 - EMP12 – Tourism
 - TRANS2 – Promoting Sustainable transport and Accessibility
 - INF4 – Water Resources
 - ENV1 – Landscape and Countryside
 - ENV3 - Biodiversity – Non- Designated Sites, Habitats and Species
 - ENV4 - Water Courses
 - ENV5 – Green Infrastructure in New Developments
 - ENB6 - Historic Environment
 - ENV7 – Listed Buildings
 - ENV12 – Pollution - impact of development on Human Health, the Natural Environment and/or Local amenity
 - EP4 - Flood Risk
 - DES 1 – Delivering High Quality Development
 - DES2 – Enhancing Local Character
 - DES8 – Efficient Use of Resources
 - CF3 – New Open Space, Sport and Recreation Facilities

PART 4 – ASSESSMENT AND CONCLUSIONS

73. The NPPF sets out a presumption in favour of sustainable development (paragraph 10), which is supported by policy C1 of the OMWCS and Core Policy 1 of the VLP1. 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.
74. All planning applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise, in accordance with the Town and Country Planning Act 1990. The key planning policies are set out above and discussed below in accordance with the key planning issues.
75. The key planning issues are:
- | | |
|--|---|
| <ul style="list-style-type: none"> • of the development • Extraction • – Landscape and Development along the River Thames • y and Tourism • on • t • • Resources | <ul style="list-style-type: none"> Principle Mineral Location Econom Recreati Transpor Design Water |
|--|---|

- Environment Historic
- ity Biodivers
- and Air Quality Amenity

Principle of the development

76. Policy CSS1 of the SOCS sets the overall strategy for the principles of development in South Oxfordshire. Outside of towns, villages and other major developments it directs that proposals for any change will need to relate to very specific needs, such as those for the agricultural industry or enhancement of the environment.
77. The principle of the proposed development is to create a marina containing 280 berths. For clarity, a berth is considered to be a designated location for mooring a vessel where the loading of people and cargo can be facilitated. 'Mooring a vessel' is to attach it to something on land or to the surface under the water to keep it in place. Following from this, 'moorings' are places where a boat may be moored (i.e. attached to a fixed point). It may consist of a buoy or mooring stage for example. 'Mooring stages' are taken to be the physical infrastructure linked to the land or to the surface under the water to facilitate keeping a boat in place and enable access for people and good from the shore. This would for example include timber staging, posts, quay headings and pontoons.
78. Policy R9 of the SOLP stipulates that in considering proposals for recreational development associated with the River Thames and its valley, the overriding aim will be to preserve the river environment and landscape. To this end part (i) of policy R9 of the SOLP states new permanent moorings or new hire bases will not be permitted. There is no differentiation between 'on-river' or 'off-river' or between leisure and residential moorings in this part of the policy. The main aim of the development, the creation of a marina containing 280 berths (or designated locations for mooring) of which over 80% would be permanent moorings, is therefore not considered supported in principle by the Development Plan.
79. The supporting text of the SOLP, paragraph 5.102 states that *"The District Council is anxious to reduce the number of permanent moorings on the river as they lead to congestion and reduce the visual amenity of the river for both walkers on the river bank and other users of the river. The Council considers that such moorings are best located off the river either in side channels or in purpose-built facilities such as the marina in a former gravel pit east of Caversham"* This aim is seen in Policy R9 part (ii) and in this part of the policy, there is specification of on-river (as opposed to off-river) moorings. It is agreed the proposed development is not for 'on-river' moorings and that the proposal is for purpose-built facilities which first specifically requires the extraction of sand and gravel as opposed to being located within an existing former gravel pit. The proposed development does not propose to re-locate existing moorings. It is however accepted that by giving boaters a choice and ability to moor within a marina people may not choose to permanently moor on the river.
80. The applicant has stated there is a need for additional moorings on the River Thames and that due to the presence of the Green Belt and AONB this is the only part of the River Thames that could be developed for a marina facility between Oxford and Reading. Information has been provided to demonstrate that the

inland South-East region has the second highest number of available marina berths, that the South East is the registered home of 23% of boats in the UK, and that it contains 19% of inland moorings.

81. The British Marine industry data which supplies the figure does not appear to differentiate between inshore and coastal boats in providing the statistic on where they are registered. As such the statistics of the proportion of boats registered in the South East do not appear to be comparable to the proportion of inland moorings in the South East. It should also be acknowledged that if the figures were comparable, the difference of four percentage points does not equate to a demonstrable need for 280 moorings, of which over 80% would be leisure berths (i.e. permanent moorings for the boat while not in use).
82. Information provided as part of the application states there are already existing marina facilities at Osney and Abingdon. These are believed to contain around 40 and 115 leisure berths respectively. There are also permanent off-river moorings at Purely Garden Moorings between Pangbourne and Reading, permanent moorings at Nag's Head Island (Abingdon) and seasonal moorings at Benson. It is recognised that in summer some of these mooring places can reach capacity and so some sites run waiting lists of users.
83. Part (iii) of policy R9 of the SOLP does support temporary and overnight moorings for visitors in suitable locations. The proposed development would provide up to 56 visitor berths (assumed to be for short term/overnight use). This is a low proportion (up to 20%) of the total number of moorings that would be provided (280) but still a sizable quantity. In the area between Reading and Oxford, short stay visitor moorings are already available at Wallingford, Iffley Loch, Sandford Loch, Culham, Benson and Goring and amongst other locations. Overall, the specific need for this number of visitor moorings is not known but it is accepted that there may be a desire for some additional summer moorings in this part of the River Thames. There is some in-principle support for the temporary and overnight mooring element of the proposed development provided it is demonstrated that these moorings are in a suitable location, where no environmental damage is caused and where proper access and other facilities are available.
84. The need for a mooring along this part of the Thames identified by the applicant has also not been identified in the emerging SOLP2034. Furthermore, draft policy ENV4 states that outside settlements, proposals for mooring stages will not be permitted. Again, there is no differentiation within the policy between 'on-river' or 'off-river' mooring stages or whether they are mooring stages for temporary, leisure or residential moorings. The proposed development is approximately 1.5km to the south of Wallingford town, outside the built-up area of the settlement and would provide floating infrastructure to facilitate moorings. As such, the proposed development is not considered to be supported in principle in the emerging SOLP2034.
85. In conclusion, a very specific need for a 280-berth marina in this location has not been demonstrated. The development is beyond Wallingford Town and is not an allocated major developed site. It is therefore considered contrary to policy CSS1 of the SOCS.
86. In relation to water-sports activities, policy R9 of the SOLP encourages that these are developed through existing sites and premises rather than the creation of new ones. It further states that planning permission may be given for new facilities for water-sports, where it can be satisfactorily demonstrated that existing facilities

would not meet the need and that there would not, as a result of the development, be insurmountable conflicts between river users, or significantly increased congestion. The proposed development does include space for water-sports ancillary to the moorings. It has not been demonstrated that existing facilities would not meet this need but letters of support from potential users, including the Boys Brigade Rowing Club, suggest there are limited sites which would meet their needs. It is recognised that if development was acceptable in principle and the criteria of Policy R9 of the SOLP was met, the creation of an area for water sports could have wider community benefit and so may weigh in favour of the development.

Mineral extraction

87. The site is in a Mineral Safeguarding Area for sharp sand and gravel as identified under policy M8 of the OMWCS and within Mineral Strategic Resource Area 5 (Thames & Lower Thames Valleys – Standlake to Yarnton) as identified under Policy M3 of the OMWCS. Mineral deposits are finite resources and can only be worked where they exist in the ground.
88. It is acknowledged that the marina could be viewed as the restoration of a mineral extraction site. Indeed, concern has been raised by members of the public, Wallingford Town Council and Cholsey Parish Council in that the mineral working would not be restored to a marina. The applicant has however been clear that the development as described is for the creation of the marina and a mineral working. They do not consider the marina should be considered in terms of restoring a mineral working to its former or alternative uses. Nevertheless, should planning permission be granted, the minerals planning authority would seek to impose restoration and aftercare conditions in accordance with policy M10 of the OMWCS.
89. Policy M8 of the OMWCS seeks to prevent development that would hinder the possible future working of mineral on a site unless the mineral will be extracted prior to the development taking place. There is no option to create a marina in the proposed location without the extraction of minerals due to the underlying site substrate. Nevertheless, on the basis that the proposed marina would otherwise hinder the possible future working of mineral on the site, the extraction of the mineral prior to the development of a permanent marina is supported in policy.
90. The applicant has suggested that the Council is consistently failing to meet its own adopted supply provision for sharp sand and gravel. On this basis they suggest that further sites are needed and greater weight should be given to the ability of the proposed development to contribute to Oxfordshire's land bank. The OMWCS policy M2 provides for 1.015mtpa of sharp sand and gravel for the whole 18 year plan period. The annual sales data shows that 0.796mt sharp sand and gravel were sold in 2018. In comparison, the three year sales average is 0.717 mt and the ten years sales average is 0.592 mt. These suggest that the demand for sharp sand and gravel is slowly increasing. As in paragraphs 1.10 and 1.11 of the latest available Local Aggregates Assessment (2018), total permitted reserves of sharp sand and gravel in Oxfordshire at the end of 2018 were 12.925 mt. This equates to a 12.3 year sharp sand and gravel land bank at the time of writing. Overall, there is no need for further sharp sand and gravel at this point in time and on this basis it is not agreed that great weight should be given to the ability of the proposed development to contribute to Oxfordshire's land bank. It must though be recognised that a landbank in excess of the minimum does not preclude the

development of additional mineral workings where these are in accordance with the development plan.

91. It is also acknowledged that as in paragraph 4.19 of the OMWLP, around 5 million tonnes of additional reserves need to be provided before 2031. These are to be allocated in the Oxfordshire Minerals and Waste Local Plan: Part 2 (Site Allocations) in accordance with policies M3 and M4 of the OMWLP. The proposed site has not been put forward by the Council as a preferred area for mineral extraction in the emerging Oxfordshire Minerals and Waste Local Plan: Part 2 (Site Allocations). This plan however is at an early stage, has not been subject to examination in public and has yet to be adopted. At the time of writing it is considered to carry limited weight.
92. Overall, should the marina be acceptable in principle then the extraction of mineral extraction as a subsidiary element would be acceptable in principle. It would contribute as a windfall development to the Oxfordshire land bank. Given there is a 12.3-year sharp sand and gravel land bank at the time of writing, the need for the aggregate is not however considered a material consideration that weighs heavily in the balance of assessing the acceptability of a marina in this location.

Location (Landscape and Development along the River Thames)

93. The application site lies between the North Wessex Downs AONB and the Chilterns AONB. The Chilterns AONB is closer and encompasses the River Thames running adjacent to the proposed development.
94. The AONB is provided with statutory protection by section 85(1) of the Countryside and Rights of Way Act 2000. Paragraph 172 of the NPPF requires that great weight should be given to conserving and enhancing landscape and scenic beauty. It further continues to say that the scale and extent of development within these designated areas should be limited and planning permission refused for major development other than in exceptional circumstances where it can be demonstrated that the development is in the public interest. The proposed development is not within the AONB and as such, the requirement to establish whether exceptional circumstances exist is not considered to apply. The impact of the proposed development in the landscape and on the setting of the AONB remains a material consideration.
95. The River Thames is recognised as an attractive and important environmental asset of the district within the development plan. In the SOCS, the River Thames is identified as a key environmental asset of the district while the Thames Valley is noted for its unspoilt peace and tranquillity while the River Thames and its banks are recognised for supporting leisure activities. The SOLP similarly supports that the River Thames and its valley constitute one of the most attractive features of the landscape of southern England with the section of the river between Reading and Oxford particularly noted for its special visual and environmental qualities which are, for the most part, unspoilt. It further states that one of the main features of the river valley is its peace and tranquillity and it is essential that this is preserved
96. Policy CSEN1 of the SOCS seeks to protect the district's distinct landscape characters and key features against inappropriate development and where possible enhance them. It states that the landscapes and waterscapes of the River Thames corridor will be maintained and where possible enhanced as will the setting and heritage of the river for its overall amenity and recreation use.

Similarly, Policy C3 of the SOLP states the distinctive character of the River Thames and its valley and the settlements on its banks will be maintained and, where appropriate, enhanced. It further states that any form of development which detracts from its special character will not be permitted.

97. Other relevant development plan policies pertaining to landscape include: policy G2 of the SOLP which seeks to protect the district's countryside, settlements and environmental resources from adverse development; policy G4 of the SOLP which states that the need to protect the countryside for its own sake is an important consideration when assessing proposals for development; policy C9 of the SOLP which as part of protecting the district's landscape features, states that any development that would cause the loss of landscape features important to the local scene will not be permitted; policy C4 of the OMWCS which requires that where minerals development are proposed along the River Thames landscape, nature conservation or amenity value are adequately protected from unacceptable adverse impacts; and policy C8 of the OMWCS which requires amongst other elements that proposals for mineral development demonstrate that they respect and where possible enhance local landscape character.
98. The emerging SOLP2034 similarly states that the valley and tributaries of the River Thames are highly attractive features of the landscape and its special visual and environmental qualities are for the most part unspoilt. Draft policy ENV1 of the SOLP2034 seeks to protect South Oxfordshire's landscape, countryside and rural areas against harmful development. The policy states that development will only be permitted where it protects and, where possible enhances, feature that contribute to the nature and quality of South Oxfordshire's valued landscapes, including the landscapes, waterscapes, cultural heritage and user enjoyment of the River Thames, its tributaries and flood plains. In addition, draft policy ENV4 of the SOLP2034, amongst other elements, requires that development of land that contains or is adjacent to a watercourse must protect and where possible, enhance the function and setting of the watercourse and its biodiversity.
99. Taken together, the development plan and specific policies outlined above are considered to place a landscape value beyond that of generic countryside on the location of the application and protect the setting of the River Thames.
100. There are major concerns with the nature and scale of the development from a landscape perspective. The OCC Landscape advisor disagrees with the conclusions of the LVIA due to a combination of an underestimation of the sensitivities of the landscape and an underestimation of the magnitude of the impacts. The landscape advisor also considers that insufficient consideration has been given by the applicant to the site's role in the setting to the AONB and to users of the River Thames. The South Oxfordshire Landscape advisor similarly raises concern and considers the application would cause unacceptable harm to the Chilterns AONB and believes the LVIA gives insufficient weight to role of the site in providing a setting for both the Chilterns and North Wessex Downs AONB, the special character of the river Thames and river Thames Valley, and the role of the site as countryside between Wallingford and Cholsey. In addition, representation from the Chilterns Conservation Board set out an objection to the development stating that that the setting of the AONB is negatively affected and disagreeing with the conclusions of the LVIA in this regard.

101. Several specific elements from the landscaping proposals, such as the depth of landscape planting, suitability of the evergreen species and width of the floodplain grazing marsh, have also been raised by consultees.
102. Concern about the development impacting the character and tranquillity of the area has been raised by SODC planning officer and Chilterns Conservation Board, and it is agreed this is a point of concern. The application site is part of the Thames River Valley area which, as above, is recognised for its tranquillity within the Development Plan.
103. The NPPG provides guidance on what factors are relevant if seeking to identify areas of tranquillity. It states that *to justify an area being protected for its tranquillity, it is likely to be relatively undisturbed by noise from human sources that undermine the intrinsic character of the area. It may, for example, provide a sense of peace and quiet or a positive soundscape where natural sounds such as birdsong or flowing water are more prominent than background noise, e.g. from transport.* On this basis, tranquillity is not considered to be solely about proximity to roads, power stations and railway lines. It includes positive factors including sense of peace, quiet and calm, positive features in the landscape and links to nature.
104. It is considered that the presence of a marina would reduce the current level of tranquillity by increasing human presence in the area, increasing the perception of urbanisation through the introduction of hard surfaces, vehicles, structures and large engineering works, and reducing the perceived naturalness of the landscape. This is considered to be an adverse impact on existing recreational users of the Thames Path and users of the river. Unlike the mineral extraction period, this change to the tranquillity of the area would be a permanent change to the character of the area.
105. In summary, the proposed development would constitute a dramatic land-use change that is both discordant with the landscape character of the area and detracts from the open and undeveloped countryside setting of the River Thames and Chilterns AONB. It is considered to be contrary to the development plan and specifically policies CSEN1 of the SOCS, C4 and C8 of the OMWCS, and C3 of the SOLP.

Economy and Tourism

106. Taken together policies CSEM1 and CSR2 of the SOCS and policies TSM1 and TSM2 of the SOLP seek to support the prosperity of South Oxfordshire's rural economy and tourist industry where proposals are of a scale and type appropriate to their location. Likewise, draft policy EMP11 of the SOLP2034 provides support for sustainable rural tourism and leisure developments that benefit businesses, communities and visitors in rural areas and which respect the character of the countryside and specifically in relation to tourism, draft policy EMP12 of the SOLP2034 provides support to development which supports economic growth in rural areas provided it conserves and enhances the landscape countryside and rural areas.
107. Policy E5 of the SOLP seeks to prevent proposals for business which conflict with the policies to protect the countryside, conflict with the policies to protect the built environment, are of a scale and type of development inappropriate to the proposed site and its surrounding; have inadequate access; are not in locations accessible by public transport in accordance with policy T2; and/or cause

problems as a result of noise, smell, dust or loss of privacy. These aspects are considered in other sections of this report.

108. The economic benefit of the proposed development has been questioned by Wallingford Town Council and Cholsey Parish Council. They note that a large proportion of berths would be leisure moorings where boats are kept while not in use. As such they consider it questionable whether those storing their boat in this location would shop locally on arrival to the marina or bring provisions with them. Once the boat has left the marina it would travel up or down river to other areas thereby diluting the economic benefit to the local area. They also consider the economic benefits must be balanced against potential negative impacts, namely harm to the Thames Path.
109. As in the comments from the SODC Economic Development Officer, it is agreed that leisure boating and marina based boats can contribute to the UK Economy. It also agreed that if there are two people per mooring using the facility for approximately 100 days in the year when running at 80% occupancy (224 berths) and an average daily spend per person of £32, there is potential to generate approximately £1.4 million for the Oxfordshire and local economy.
110. Overall, while the accuracy of the numeric value of the proposed development to the Oxfordshire and local economy is questioned, it is considered the proposed development would have an economic benefit and this weights in support of the proposed development. The relevant development plan policies are however caveated by requirements be of a type and scale suitable to their location. As set out above, there are major concerns in this regard and as such, it is not considered that the development is in accordance with policies CSEM1 and CSR2 of the SOCS and policies TSM1 and TSM2 of the SOLP.

Recreation

111. In regard to rights of way, policy C11 of the OMWCS requires that the integrity and amenity value of the rights of way network shall be maintained and, if possible, retained in situ in safe and useable condition. Policy R8 of the SOLP similarly seeks to retain and protect the existing public rights of way network.
112. The proposed development would maintain the route of the Thames Path National Trail along the river. The Countryside Access Strategy & Development Officer has advised that any impacts of visual amenity, dust and noise on the Thames Path National Trail during the mineral extraction can be reduced by maintaining effective natural vegetation. This may be secured via condition. He further considers that as no excavation would happen in a wide corridor around the Thames Path National Trail the path's integrity would be maintained.
113. The development would provide new opportunity for public recreation and outdoor sport. An area in the southern part of the site has been allocated for the hire of non-motorised water uses as a facility for use by the public. The route of the Thames Path National Trail would be maintained and a new footpath around the north, west and eastern perimeters of the site to connect to the Thames Path National Trail would be provided. Where the marina entrance would cross the Thames Path National Trail, a new accessible for all footbridge would be provided. In addition to the procession of the footbridge, it is recommended that the developer carry out improvements to the Thames Path National Trail through the site, such as bank repairs works, as it forms an integral part of the site's perimeter path network. These elements may be secured via condition.

114. Concern has been raised about disruption to the Thames Path National Trail when the footbridge was put in place and it has been highlighted that a temporary diversion that ensures minimum disruption to users of the trail would be required. It has been commented that if the new footbridge could be constructed and installed before the marina river entrance is constructed then the level and duration of disturbance on users of the National Trail would be significantly reduced. Should planning permission be granted, in order to minimise disturbance, it is recommended a plan for the work and measures to minimise disturbance to users of the Thames Path National Trail are sought via condition.
115. Subject to the conditions outlined above, the proposed development is considered to be in accordance with policy R8 of the SOLP and policy C11 of the OMWCS.
116. Policy R4 of the SOLP supports proposals for outdoor sport in the countryside provided that the proposals would not detract from the rural character and landscape of the area, particularly in the AONBs; would not adversely affect the amenities of residents in the vicinity or spoil the enjoyment of other users of the countryside, particularly by noise, but also by smell, traffic generation or any other disturbance; and would not adversely affect sites of archaeological, historical or natural conservation importance. Similarly, draft policy CF3 of the SOLP2034 seeks to encourage and support proposals for sport and recreation facilities where they are in accordance with other planning policies and Sport England Guidance. Policy R9 of the SOLP is also considered to be of relevance and has been discussed in paragraph 86 above.
117. Sport England raise no objection to the development but do express disappointment that the community water area has reduced in size as the application has progressed. The Boys Brigade Rowing Club and Wallingford Accessible Boat Club have identified the site as a facility that they may wish to use, and elements of the site have been designed with the latter in mind. Some suggestions have been made by British Canoeing and British Rowing in regard to public use of the rowing launch and ease of the public to launch their own boats which would bring wider public benefit to the facility and these may be further investigated should the principle be considered acceptable.
118. There are already outdoor sports taking place on the River Thames in this area and there is concern about the impact of river traffic associated with the proposed marina may have on them. The Oxford University Rowing Club and Oxford Brookes University Rowing have provided comments to the application setting out the volume of rowing eights that may be using the river already at peak times and raised serious safety concerns regarding access to and from the river. A number of representations have similarly raised concern about the safety of boats exiting the marina. In summary, boats should travel on the right-hand side of the river and pass other boats left-to-left. This is the opposite to cars on roads. With the marina entrance on the right-hand bank when travelling downstream there is a concern that boats exiting the marina may have their visibility impeded by the footbridge and not be able to see or avoid rowing eights which are already low on the water and travel down river at speed, especially when travelling along the measured course in the area.
119. Sport England have also likewise commented that interaction between boats leaving the proposed marina and that using the river for sport, such as rowers and canoers needs careful consideration and management, including potentially installing signage to minimise the likelihood of collision with larger boats. It is accepted that in any location boats must keep a look out and the hazards of

exiting or entering the main river and avoiding other boats is not a novel issue in relation to this proposed marina.

120. The health and safety issues and risk of accidents is a concern in cumulation with the existing high use of the river for rowing in this location, the upstream bend to the river, existing bridge for Nosworthy Way (A4130) and proposed footbridge all of which potentially impede visibility for those exiting the river, and the large size of the proposed marina.
121. If there is sufficient visibility, signage warning those leaving the marina of the rowers travelling at speed close to the water level and the need to be vigilant would be helpful and may be secured via condition. If there is insufficient visibility, this is unlikely to help avoid accidents and would harm the existing recreational use of the area. Additional land take to create visibility splays may overcome the health and safety issue but these would lead to a reduction in habitat along the River corridor and would therefore require further evaluation from an ecological perspective. The OCC Ecologist has advised that additional habitat loss along the River corridor, either for access or accommodating a bigger bridge, would pose a likely unacceptable loss.
122. In summary, the proposed development would provide new opportunities for outdoor sport and some existing groups have shown support for the facilities that would be provided. Should planning permission be granted it is recommended this is subject to a guarantee of community use. There are however large concerns over conflict with those already using the river for outdoor sport and the safety of the marina entrance/exit. It has not been demonstrated that the development would not have an unacceptable impact on the enjoyment of existing recreational users of the river though additional water traffic generation and this is contrary to policy R4 of the SOLP 2011.

Transport

123. Through the SOCS and policy CMS1, there is an aim to work with OCC and others in regard to transport and, amongst other elements, to ensure the impact of development on the road network is adequately mitigated, support measures which promote a modal shift to public transport, walking and cycling, support active travel and cater for the needs of all users. Paragraph 109 of the NPPF states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
124. Policy T1 of the SOLP requires that proposals will, amongst other elements as appropriate be required to provide for a safe and convenient access to the highway network; provide safe and convenient routes for cyclists and pedestrians; be accessible by public transport and have a safe walking route to nearby bus stops or new bus stops and appropriate infrastructure should be provided; and be served by an adequate road network which can accommodate traffic without creating traffic hazards or damage to the environment. Draft policy TRANS2 of the SOLP2034 makes similar provision. Policy T2 of the SOLP requires development to make provision for reducing the need for vehicle parking where appropriate and provide turning and circulation space, cycle parking, vehicle parking and parking for people with disabilities. Likewise, policy D2 of the SOLP requires adequate, safe and secure access for vehicles and cycles. It further requires that vehicle parking should be provided in a discreet and sensitive manner.

125. Policy C10 of the OMWCS requires minerals and waste development to make provision for safe and suitable access to the advisory lorry routes shown on the Oxfordshire Lorry Route Maps in ways that maintain and, if possible, lead to improvements in the safety of all road users including pedestrians; the efficiency and quality of the road network; and residential and environmental amenity, including air quality. Where minerals are to be transported by road it requires that road distances to the areas of demand are minimised.
126. During the mineral extraction phase, it is proposed that vehicles would access the proposed development via a new site entrance off Reading Road (A4329) and egress via a new exit off the site on to Nosworthy Way (A4130). They would turn left into and left out of the site. There would be an estimated maximum of 50 HGVs in and 50 HGVs out of the site each day during the extraction of minerals from the site. The A4130 near Wallingford is recognised as a route for local access only on the Oxfordshire Lorry Route Map but connects to the A43, a designed through route for lorry movements, to the west of Didcott. The possibility of exporting mineral from the site along the River Thames has not been explored despite it lying adjacent to the site. Given the concerns over the conflict with rowers using this stretch of the River Thames it is questionable whether moving material by barge would be suitable in this location.
127. The marina would provide 280 berths, up to 20% would be for visitors. The remaining berths (upwards of 224) would be leisure moorings (i.e. permanent moorings for boats whilst not in use). It is unlikely that those using the visitor berths would arrive at the site by means other than water. The occupiers of the remaining berths (upwards of 224) plus day visitors would however need to access the site via land. It should be noted that no residential moorings (i.e. permanent moorings for boats whilst in use) are proposed. A number of public representations raise concern about traffic associated with the development both during the mineral extraction phase and while operating as a marina.
128. Modelling of the traffic and junctions has been undertaken by the applicant and this has been reviewed by the OCC Transport team. Concern has been raised as to whether the data in the Transport Assessment is up-to-date, capacity of nearby junctions, accessibility and upgrading of the footway and lack of information over the vehicle movements associated with use of the marina during the week. An objection has been raised due to the access arrangements. Concern has been raised by Cholsey Parish Council and Wallingford Town Council over the increase in traffic in the area, especially in cumulation with the 70-bed care home to the north of the site. The OCC Transport Team have advised the issues potentially have 'severe' consequence for the proposed development's influence on the highway network. Further information has been submitted by the applicant but at the time of writing, no updated comments have been provided. A verbal update will be provided to committee if available.
129. When a marina, both access and egress would be via a new T-junction from the Reading road (A4329) in the northwest section of the site. The marina would be easily accessible by car. Around 220 parking spaces would be provided with 130 allocated for the long-term berths and 90 allocated to visitor moorings, the public and visitors to the marina. This is a large amount of car parking, requiring without circulation space or landscaping an area of over 2,500 square metres. In providing one space for every two berths there is an assumption that not all berth holders would be using the facility at the same time and/or that a substantial proportion would access the site by means other than private motor vehicle. An

overspill of berth holders' car parking into the public and visitor car parking area could displace those people from the facility.

130. It is agreed the site is less easily accessible by non-private vehicle. By foot, Wallingford is 20-30 minutes journey either alongside Reading Road or on the Thames Path while Cholsey is about a 30-minute journey alongside roads. There are no cycle routes that pass the site though the area is relatively flat. No designated parking is provided on the site for cyclists, but should the development be considered acceptable in principle, this may be secured via condition. A determined person could reach the site by public transport - The closest bus stops are approximately 500 metres from the site entrance but reaching these bus stops would require use of an informal crossing/pedestrian refuge across the A4130 (Nosworthy Way) with narrow footways only available on the north side of Reading road by the entrance to the marina. The bus stops provide services to both Wallingford and Cholsey. The railway line at Cholsey connects to London and Didcot with peak time commuter services to Reading and Oxford and a heritage railway connection to Wallingford.
131. At the time of determination there remain several substantial concerns relating to transport and accessibility. Accessibility of the site for non-vehicular modes is also concerning at the present time and the development is also not considered to comply with policy T1 of the SOLP or draft policy TRANS2 of the SOLP2034.

Design

132. In accordance with the National Design Guide, a well-designed place is based on a sound understanding of the features of the site and the surrounding context; integrated into their surroundings; influenced by and influencing their context positively; and responsive to local history and cultural heritage. A place's character is not separate from its other attributes but a combination of them all as they have developed through time. It includes the current uses, how the place works, the patterns of movement, what the spaces are like and how they are enclosed, how adaptable and resilient the place is, how efficient it is in its use of resources, and what it looks like.
133. Policy D1 of the SOLP requires that the principles of good design and the protection and reinforcement of local distinctiveness are taken into account in all new development. Amongst other elements, this comprises respecting the character of the existing landscape, providing for a choice of routes and transport modes to, from and within the development and providing good quality site and building design and appropriate materials. Policy CSQ3 of the SOCS supports places that are of a high quality and inclusive design. This includes responding positively to and respecting the character of the site and its surroundings, particularly the historic significance and heritage values of the historic environment, enhancing local distinctiveness and ensuring that new development is of a scale, type and density appropriate to the site and its setting. It also includes providing links to green infrastructure, ensuring high levels of accessibility and ease of use by all modes of transport, and being adaptable to changing requirements.
134. There is a requirement through the development plan for inclusive design. Policy D7 of the SOLP requires that proposals for new buildings to which the public have access include in their design and external layout appropriate measures to ensure adequate access for those with impaired mobility, hearing or sight. It further requires that the safety and access requirements of those with impairments

should also be taken into account in the design and layout of new roads, parking areas, footways, pedestrian routes, cycle ways, traffic management measures and pedestrian priority areas.

135. In regard to sustainable design and construction, policy CSQ2 of the SOCS states that proposals for new development of this scale (>1000 m² of non-residential floor space) will be acceptable where 20% of energy demand is secured from decentralised (on or near site) and renewable or local carbon energy sources (including the use of Combined Heat and Power where appropriate), where this would be viable and where the proposed development will achieve at least BREEAM 'Excellent' standard.
136. The SOLP2034 also contains several policies relevant to the proposed development including DES1 which seeks to deliver high quality design which reflects positively the features that make up the character of the area, DES2 which seeks to ensure new development enhances local character and DES8 which seeks to minimise waste and maximise energy and water efficiency.
137. Viewing the proposed development in isolation from its surroundings, it seems that consideration has been given to the layout and accessibility for users of the marina. The pontoons are floating allowing them to rise and fall with water level in the river, minimising inconvenience for boaters occupying berths long term. The area for the hire of non-motorised craft is located at the opposite site to the marina entrance and re-fuelling area to minimise conflict between these user groups. The footpath around the site linked to the public right of way is welcomed, as is retaining the route of the River Thames Footpath.
138. Measures have been taken to facilitate inclusive access to the development. Provision has been made for a dedicated slipway and mooring location to allow wheelchair users to roll on and off the boat onto pontoon walkways. This accessible area would be located near to the accessible parking spaces further aiding accessibility. The facilities building is all one level and pathways will provide easy access for all users across the site, with the footbridge over the River Thames at a slope to be accessible for all users. This is in accordance with policy D7 of the SOLP.
139. Layout and inclusive access are however just two parts of design. In addition, there are less satisfactory layout elements once a marginally wider context is considered. The site caters primarily for those arriving at the site by car and yet those arriving at the site by road would be greeted by a car park, refuse and recycling area and rear façade of the facilities with some landscaping. This is not considered to be an attractive gateway to the River Thames and Chilterns AONB beyond.
140. There are also concerns about the resilience of some elements of the proposed landscaping in the marina design. For example the OCC Landscape advisor has highlighted the proposed floodplain grazing marsh between the Thames Path and marina is narrow and will come under pressure from users of the Thames Path, recreational users of the marina/ circular path, users of the boat house who carry their boats across this stretch of grassland and transient boaters/kayakers who might want to stop.
141. It has already been set out in earlier sections of this report that the proposed development is not well suited to the character of the area and that its scale is out

of context within its surroundings. The extent to which it is facilitating ease of movement along the river is unclear as serious concerns have been raised regarding conflict with other users of the river.

142. It is not possible to comment further on the appearance, details and materials of the built form including hard surfacing and boundary treatment as it is proposed that detailed dimensions and designs would be agreed via condition should the proposed development gain planning permission. Nevertheless, these would have a significant impact on the attractiveness and appearance of the development. As the development is not considered to be acceptable in principle, these have not been sought from the applicant. For the same reason, no information has been sought from the applicant in regard to achieving BREEM 'Excellent' Standard, decentralised and renewable energy as required through policy CSQ2 of the SOCS. Should the development be found acceptable in principle, these matters would require further consideration.
143. In summary, it is accepted that the proposed development is broadly fit for purpose as a marina. It is not however considered to be integrated into its surroundings or sympathetically designed for this specific location. Beyond the retention of the River Thames footpath, the design does not appear to have been influenced by its context. Overall, and for these reasons, it is not considered to be a well-designed place. Taken holistically, the development cannot be said to be in accordance with policies D1 of the SOLP, policy CSQ3 of the SOCS or the energy requirements of policy CSQ2 of the SOCS.

Water Resources

144. Policy C3 of the OMWCS states that minerals and waste development will, wherever possible, take place in areas with the lowest probability of flood risk. Where development takes place in an area of identified flood risk, it states this should only be where alternative locations have been discounted and where a flood risk assessment is able to demonstrate that the risk of flooding is not increased from any other source. In addition, the opportunity should be taken to increase flood storage capacity in the flood plain where possible, particularly through the restoration of sand and gravel workings.
145. Policy CSQ2 of the SOCS requires all developments to implement SuDs where appropriate and to incorporate measures that address issues of adaptation to climate change taking account of best practice. These include resilience to increasing temperatures and heavy rainfall events and the need for water conservation and storage. Policy EP6 of the SOLP similarly supports the use of sustainable drainage principles designed into the development layout. Within the SOLP2034, draft policy EP4 requires that the risk and impact of flooding are minimised and that flood risk is not increased elsewhere as a result of development and supports the use of sustainable drainage systems while draft policy INF4 requires that all proposals must demonstrate there is or will be adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the whole development.
146. Paragraph 170 of the National Planning Policy Framework states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of water pollution. Policy C4 of the OMWCS further requires that proposals for minerals and waste development need to demonstrate there would be no

unacceptable adverse impact to the water environment. In relation to ground water, Policy SP7 of the SOLP states that development that may have an adverse effect upon groundwater resources will not be permitted unless effective preventative measures are taken to ensure that the quality and quantity of these resources are maintained.

147. The site is in part of the flood plain and between the application being submitted and determined, further flood modelling for the River Thames has been carried out. The results of this modelling increase the flood risk for the site. Both marinas and mineral extraction developments are however water compatible as set out in paragraph 066 Reference ID: 7-066-20140306 of the Planning Practice Guidance. Adaptation to flooding measures have been taken in the marina using floating pontoons to work with rising and falling water level. Following the comments of the SODC Flooding and Drainage Officer it is recommended that the finished floor levels of non-water compatible buildings (such as the main marina building) are raised and flood avoidance/ resistant/ resilience measures are incorporated into its design (e.g. installing services above the predicted flood level and appropriate use of materials). This may be secured via conditions should planning permission be granted.
148. Some concern has been raised by the SODC Flooding and Drainage officer about silt being washed into the River Thames from the extraction and washing process in the mineral extraction phase. It is recommended a plan for the management of this is provided to reduce the risk of silt entering the water course. It is also recommended that prior to each phase further details of surface water drainage are provided. These again may be secured via condition should planning permission be granted.
149. The development would utilise the mains sewerage network for foul water when operational as a marina. No objection has been raised by the network provider (Thames Water) to this. Concerns have been raised about the water demand from the development and it is requested the developer work with Thames Water to resolve this matter.
150. When a marina, the site would utilise elements such as permeable paving, ditches, ponds and wetlands to store the runoff waters. This utilisation of sustainable drainage is in accordance with policies EP6 of the SOLP and CSQ2 of the SOCS. To ensure that the system provides adequate filtering to prevent polluted surface waters from entering the River Thames, it is recommended that the details of a surface water drainage scheme and provision for its on-going maintenance are secured via condition. The surface water run off mobilising pollutants is considered to most acute in the workshop and car parking areas.
151. Within the marina itself, there is a risk of fuel and oil spillages from boats entering the water. The concentration of boats in the area make this of greater concern. It is however noted that the proposed development includes a fuel-pump out dock as well as refuse and re-cycling areas.
152. The Environment Agency have in their objection to the development raised concerns about the marina construction causing pollution or unnecessary impacts to the water environment, particularly relating to the clay barrier and concrete/sheet piling for the marina entrance. The applicant disputes this, stating that the EA require borehole monitoring to assess the pre and post development levels of the groundwater, comment that an EA permit would be sought for the imported fill and state their awareness of new groundwater abstraction regulations

which in their view is supported by the Hydrological Impact Assessment. At the time of writing, no updated comments have been provided from the Environment Agency. A verbal update will be provided to committee if available.

153. When determining applications, Planning Authorities are obliged to concern themselves with implementing the planning strategy in the Development Plan and not with the control of processes, such as permitting, which are a matter for the Environment Agency and pollution control authorities. Planning Authorities must also work on the assumption that the relevant pollution control regime will be properly applied and enforced. It is not clear at the time of writing whether and with the information available the above concerns are a permitting matter. This would need to be established before planning permission was granted.
154. Aside from this last matter, subject to conditions as outlined above, the proposed development is considered to be broadly compliant with policies C3 and C4 of the OMWCS, CSQ2 of the SOCS, EP6 of the SOLP and draft policies EP4 and INF4 of the SOLP2034.

Historic Environment

155. OMWCS Policy C9 states that proposals for minerals and waste development will not be permitted unless it can be demonstrated that they, or associated activities, will not have an unacceptable adverse impact on the historic environment. Policy CSEN3 of the SOCS seeks to protect the district's designated heritage assets including listed buildings and their settings. In regard to non-designated heritage assets, it states that proposals will be considered taking into account the scale of any harm or loss and the significance of the heritage asset. In addition, Policy CON5 of the SOLP states that proposes for development which would adversely affect the setting of a listed building will be refused.
156. In the emerging SOLP2034, policy ENV6 similarly seeks to protect, conserve and enhance the District's historic environment (including historic buildings and structures, Conservation Areas, landscapes and archaeology) while policy ENV7 focuses on listed buildings. It requires that where development proposals affecting the significance of a listed building or its setting will lead to substantial harm to or total loss of significance they will only be supported where it is justified that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
157. Section 66(1) of the Listed Buildings and Conservation Areas Act 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
158. Paragraph 190 of the NPPF requires decision makers to avoid or minimise the impact of proposed development on the conservation of a heritage asset. This may, for example, be achieved by conditions which screen the development so to minimise the impact of the setting of the listed buildings. Paragraph 193 of the NPPF 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 (and the more important the assets, the greater the amount of weight). The same paragraph states that this great weight should be applied irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

159. There are no designated heritage assets on the site but the site is in close proximity to a number of listed buildings; specifically White Cross House and the former Carmel College site on the opposite bank of the River Thames which contains a number of listed buildings and structures including the grade II* Gottlieb Gallery and Boathouse and the grade II ruin of the Church of St John the Baptist.
160. Historic England do not consider the proposals minimise conflict with the conservation of nearby historic assets as required by paragraph 190 of the NPPF and advise the landscaping on the riverbank could be improved to mitigate impacts. The SODC Conservation Officer has raised similar concerns on the application. Both advise that consideration is given to paragraphs 193, 194 and 196 (formerly paragraph 132 and 134) of the NPPF and Section 66(1) of the Listed Buildings and Conservation Areas Act 1990. Given the reference to paragraph 196 of the NPPF, it is concluded that the proposed development would result in 'less than substantial harm' which must be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
161. In regard to minimising the impact of the proposed development on heritage assets as supported by paragraph 190 of the NPPF, Historic England has suggested landscaping along the western bank of the river between the development site and heritage assets may help mitigate harm from the proposals. It has already been established that the proposed development is in a sensitive landscape. As such, and mindful that it is not guaranteed the landscaping would mitigate harm, it is not considered appropriate in this instance for such a scheme to be secured by condition.
162. The PPG, paragraph 020 Reference ID: 18a-020-20190723, provides information on what is meant by 'public benefits' and states they could be anything that delivers economic, social or environmental objectives, should flow from the proposed development and should be of a nature or scale to be of benefit to the public at large but do not have to be visible or accessible to them.
163. As set out in earlier sections of this report, there a land bank in excess of the minimum for sharp sand and gravel and supply exceeds demand. As the main purpose of the development is for a marina, aggregates from the site would contribute as a windfall development. It is not meeting an identified need and it is not considered that the aggregate extraction in this location would be of benefit to the wider public.
164. The marina itself would deliver some public benefit. It would provide permanent employment for around eight people, contribute to the Oxfordshire Economy and would contain areas accessible to the wider public including those less able bodied. These public benefits are not the drivers of the development and are considered to be relatively minimal compared to the scale of the scheme and nature as a commercial enterprise. On balance, it is not considered they would out-weigh the less than substantial harm.
165. Due to the impact of the proposed development on the setting of two listed assets, the proposed development is not considered to accord with policy CSEN3 of the SOCS or Policy C9 of the OMWCS. In accordance with policy CON5 of the SOLP, it is advised that planning permission is refused.
166. The mineral extraction element of the development would result in total disturbance of the land to remove the aggregate. The OCC Archaeologist has

highlighted the site is located in an area of considerable archaeological interest. Information submitted as part of the application has identified a number of archaeological features in the northern part of the site, thought to be of Mesolithic/Bronze age and later prehistoric to Roman. These features would be impacted and archaeological work would therefore be required should planning permission be granted. These may be secured via a pre-commencement condition. From an archaeology perspective, the proposed development is considered to accord with policy C9 of the OMWCSC and Policy CSEN3 of the SOCS.

Biodiversity

167. Avoiding a loss of biodiversity and maximising opportunities for biodiversity net gain in development is supported through policies CSB1 of the SOCS, policy C6 of the SOLP and Draft policy ENV3 of the SOLP2034. Where there is any significant loss in biodiversity as part of a proposed development, policy C6 of the SOLP requires the creation and maintenance of new landscape features, habitats, habitat links and wildlife corridors of appropriate scale and kind will be required to ensure there is no net loss in biodiversity resources. In the OMWCS, Policy C7 provides the basis for considering whether the impact of minerals or waste development in terms of biodiversity is acceptable or capable of satisfactory mitigation. The creation of priority habitat through the restoration of mineral working sites can also play a role in adaptation to climate change and is supported through policy C2 of the OMWCS.
168. Policy CSG1 of the SOCS states a net gain in green infrastructure, including biodiversity will be sought through developer works, developer contributions and the target use of other funding. It requires that new developments must demonstrate that they have taken into account the relationship of the proposed development to existing green infrastructure. Draft Policy ENV5 of the SOLP2034 relates to Green Infrastructure. Amongst other elements, it similarly seeks to protect, conserve and enhance this, ensure appropriate provision in new development and avoid its loss or other negative impacts.
169. Much of the site's current biodiversity value is associated with the grassland and marsh areas. Some of this would be lost as a result of the development and loss of the floodplain grazing marsh, a habitat of importance, is a concern highlighted by the Ecology Officer and Natural England. The proposed development would lead to a net-gain of three biodiversity units. This has been demonstrated using a biodiversity impact calculator metric accepted by the Ecology Officer. Much of the site's biodiversity gain comes from the creation of open water habitat (standing water – mesotrophic) and Natural England have expressed some concern of use of the biodiversity metric given the design and nature of the open water habitat as it is a marina.
170. There is a wider argument about the applicability of biodiversity accounting metrics and whether it is suitable for one habitat to be substituted for another. This is predominantly beyond the scope of this application and while the planning authority accepts the position of Natural England, notes the position of the OCC Ecologist that the development has been designed foremost as a marina rather than for biodiversity, it equally accepts that the metric used is valid and demonstrates there would be a net-gain in biodiversity.
171. The establishment of additional biodiversity benefits, for example through the use of planting of known benefit to wildlife such as pollinators, artificial roost features

and long-term ecological management of areas closed off to the public, are recommended. Should the development be considered acceptable a number of biodiversity related conditions as detailed by the Ecologist in her comments are recommended.

172. The majority of trees around the boundary of the site would be retained. Some concerns have been raised in relation to tree T53. This is located close to the riverbank in the north east part of the site and on the edge of the extraction zone. The proposed development would see it located on the area of floodplain grazing marsh between the marina basin and river. The tree is possibly a rare Black Poplar and has high landscape and ecological value due to its size, isolated position within open grassland, and observed use by a kite and buzzard. The extraction works would have a major impact on this tree likely leading to its loss. Further works are recommended to establish whether this tree can be retained in the submitted Arboricultural report and the need for clarification on this matter has been highlighted by the Tree Officer and Ecology Officer. Should the committee resolve to grant planning permission, it is recommended this matter is resolved prior to the issuing of any consent.

Amenity and Air Quality

173. Policy EP1 of the SOLP seeks to prevent polluting emissions which would have an adverse effect on people and other living organism, the atmosphere, the land and water resources unless effective mitigation measures are implemented. This is similarly seen in in draft policy ENV12 of the SOLP2034. In relation to noise, policy EP2 of the SOLP states that development which would have an adverse effect on existing or proposed occupiers will not be permitted unless effective mitigation measures are implemented.
174. Policy C5 of the OMWCS requires that proposals for minerals and waste development demonstrate they will not have an unacceptable adverse impact on the local environment, human health and safety, residential amenity and other sensitive receptors and the local economy including from noise, dust, litter and mud on the road.
175. Concerns have been raised by members of the public in regard to dust, air quality and pollution.
176. The information submitted as part of the application focuses on dust and particulate matter. The OCC Public Health Officer has raised concerns that dust from the development would negatively impact local residents and would be greater than estimated in the Air Quality Assessment and considers further information is necessary. There is also an AQMA for nitrogen dioxide level in the centre of Wallingford and the impact of the mineral extraction phase and marina operation (including the traffic generation and manoeuvring of boats) on this need to be considered. At the present time, the proposed development is not considered to comply with policy EP1 of the SOLP or policy C5 of the OMWCS in relation to dust, particulate matter or air quality.
177. A noise assessment was submitted to accompany the development. This focuses on the mineral extraction phase. It recommends establishing a noise limit of 54 dB(A) LAeq,1h (free field) for three nearby properties and 55 dB(A) LAeq,1h (free field) for seven others for the duration of mineral extraction. This limit of 55 dB(A) LAeq,1h (free field) is the maximum limit recommended in the PPG and is considered acceptable. This would exclude temporary noise operations, such as soil stripping which again is in accordance with the PPG. A number of other noise

reduction measures are recommended including exhaust silencers, minimising drop height of materials, hours of operation and perimeter bunding. It is agreed these may be secured via conditions should planning permission be granted. Subject to these conditions, the proposed development is considered to accord with policy EP2 of the SOLP and the noise elements of policy C5 of the OMWCS.

178. Due to the scale of the development with provision for day visitors with picnics and barbecues, and proximity to water, should planning permission be granted it is recommended a scheme for managing litter at the site be secured via condition in the interest of local amenity and avoiding harm to aquatic creatures.
179. With regard to lighting, policy EP3 of the SOLP states that proposals for new floodlighting and other external lighting that would have an adverse effect on neighbouring residents, the rural character of the countryside or biodiversity will not be permitted, unless effective mitigation measures will be implemented. During the mineral extraction phase, it is proposed to provide external lighting around the site offices, plant and workshop area. When operational as a marina, low level external lighting around the facilities building, access walkways, moorings and pontoons is proposed. This would remain on during the hours of darkness.
180. A number of aspects, such as the character and tranquillity of the area are also relevant to lighting and have already been raised in the location section and there are further considerations in relation to biodiversity. The nearest residential property is approximately 80 metres to the south of the site, away from the facilities building, access walkways and pontoons. There is potential to mitigate the impact of lighting through lighting design and the landscaping scheme and reinforced boundary planting during the mineral extraction phase and marina development. With this mind, it is not considered the lighting would cause great harm to local residents in their dwellings.

Agricultural Land

181. Paragraph 170 (b) of the NPPF requires that planning decision recognise the economic and other benefits of the best and most versatile (BMV) agricultural land as part of conserving and enhancing the natural environment. Policy C6 of the OMWCS requires that proposals for minerals and waste development demonstrate they take into account the presence of any BMV agricultural land. It continues to state that 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.
182. The proposed development would cover an area of approximately 19 hectares and would include around 9.3 hectares of BMV agricultural land; namely Grades 1, 2 and 3a. It is proposed to export the BMV soils for sale. In the view of Natural England, this method does not enable the land to retain its longer-term capability and so does not meet the requirements of sustainable mineral development.
183. As set out above, there is no aggregate need supporting the development and no specific need for a marina of 280 berths in this location. BMV agricultural land loss is not a factor included in the alternative site search. The proposed development is therefore not considered to be in accordance with policy C6 of the OMWCS.

184. Should the development be found acceptable in principle and needed in this location then the loss of BMV land would likely be outweighed. In this instance, and should planning permission be granted, it is recommended that soil handling conditions are imposed in accordance with Defra's Good Practice Guide for Handling Soils to avoid compaction and harm to the resource.

Other Matters

185. Much concern has been raised in representations that a marina may not be created once the sand and gravel was extracted and an empty basin would instead be left in the landscape. Responsibility for the restoration and aftercare of mineral sites, including financial responsibility, lies with the minerals operator and, in the case of default, with the landowner
186. It would be possible through the use of phasing conditions to move the development towards the creation of a marina. Various elements, for example the accesses, may also be conditioned where they are necessary to make the development acceptable to ensure they are implemented.
187. In accordance with paragraph 205 of the NPPF bonds or other financial guarantees to underpin planning conditions should only be sought in exceptional circumstances. The Planning Practice Guidance contains further information on this and suggests exceptional circumstances may exist where there are not justifiable reasons to refuse the development, but a novel approach is to be used or where there is reliable evidence of the likelihood of either financial or technical failure.
188. The application is recommended for refusal. If the committee were minded to grant planning permission, it is recommended that further consideration is given to this matter, additional information sought from the applicant, and legal advice sought.
189. Concern has also been raised in relation to bird strike. The application and supporting documents have been assessed in relation to this and the MOD has no safeguarding concerns subject to a number of minor amendments to the monitoring scheme and a legally based Bird Strike Management Plan. Should the committee be minded to support the application it is recommended that the first element is resolved prior to planning permission being granted. The second element may be secured via condition or legal agreement.

Conclusion

190. All planning applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise, in accordance with the Town and Country Planning Act 1990. The NPPF sets out a presumption in favour of sustainable development (paragraph 10), which is supported by policy C1 of the OMWCS and Core Policy 1 of the VLP1. 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.
191. It is not considered a very specific need for a 280-berth marina in this location has been demonstrated. It is therefore considered contrary to policy CSS1 of the SOCS.
192. Due to its purpose, scale, location and the existing character of the location, the development is contrary to the Development Plan as a whole and specifically

policies CSEN1 of the SOCS, C4 and C8 of the OMWCS, and R9 and C3 of the SOLP. The need for the marina and economic benefit (in relation to tourism, recreation and mineral extraction) have been considered but are not considered sufficient to outweigh the lack of in-principle support. Aside from the lack of in-principle support there are concerns over the acceptability of details of the proposed development.

193. The development would harm the setting of listed buildings and the public benefit of the development is not considered to outweigh that harm. It is therefore contrary to policy CSEN3 of the SOCS, Policy C9 of the OMWCS and Section 66(1) of the Listed Buildings and Conservation Areas Act 1990. Planning permission should be refused in accordance with policy CON5 of the SOLP.
194. The development is not considered to be a well-designed place. It is not integrated into its surroundings or sympathetically designed for this specific location. Beyond the retention of the River Thames footpath, the design does not appear to have been influenced by its context. Taken holistically, the development cannot be said to be in accordance with policies D1 of the SOLP or policy CSQ3 of the SOCS. Accessibility of the site for non-vehicular modes is also concerning and the development is not considered to comply with policy T1 of the SOLP.
195. The loss of BMV agricultural land without it being shown that there is a need for the development which cannot reasonably be met using lower grade land and without all options for reinstatement without loss of quality having been considered is contrary to policy C6 of the OMWCS.
196. Unresolved matters relating to air quality and human health result in the proposed development being contrary to air quality, pollution and human health elements of policy EP1 of the SOLP and policy C5 of the OMWCS.
197. Furthermore, there are unresolved issues and outstanding objections relating to water resources, access/egress by vehicle on to the public highway, and conflict between boats entering/exiting the marina and those already using the river for rowing and paddling. The development may have a severe impact on highway safety, impact ground water and have an unacceptable impact on existing recreational users of the river.
198. In summary, the development is on balance considered contrary to the development plan. Material considerations do not indicate that planning permission should be granted. It is recommended that planning permission is refused.

RACHEL WILEMAN

ASSISTANT DIRECTOR FOR STRATEGIC INFRASTRUCTURE AND PLANNING

August 2020

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:

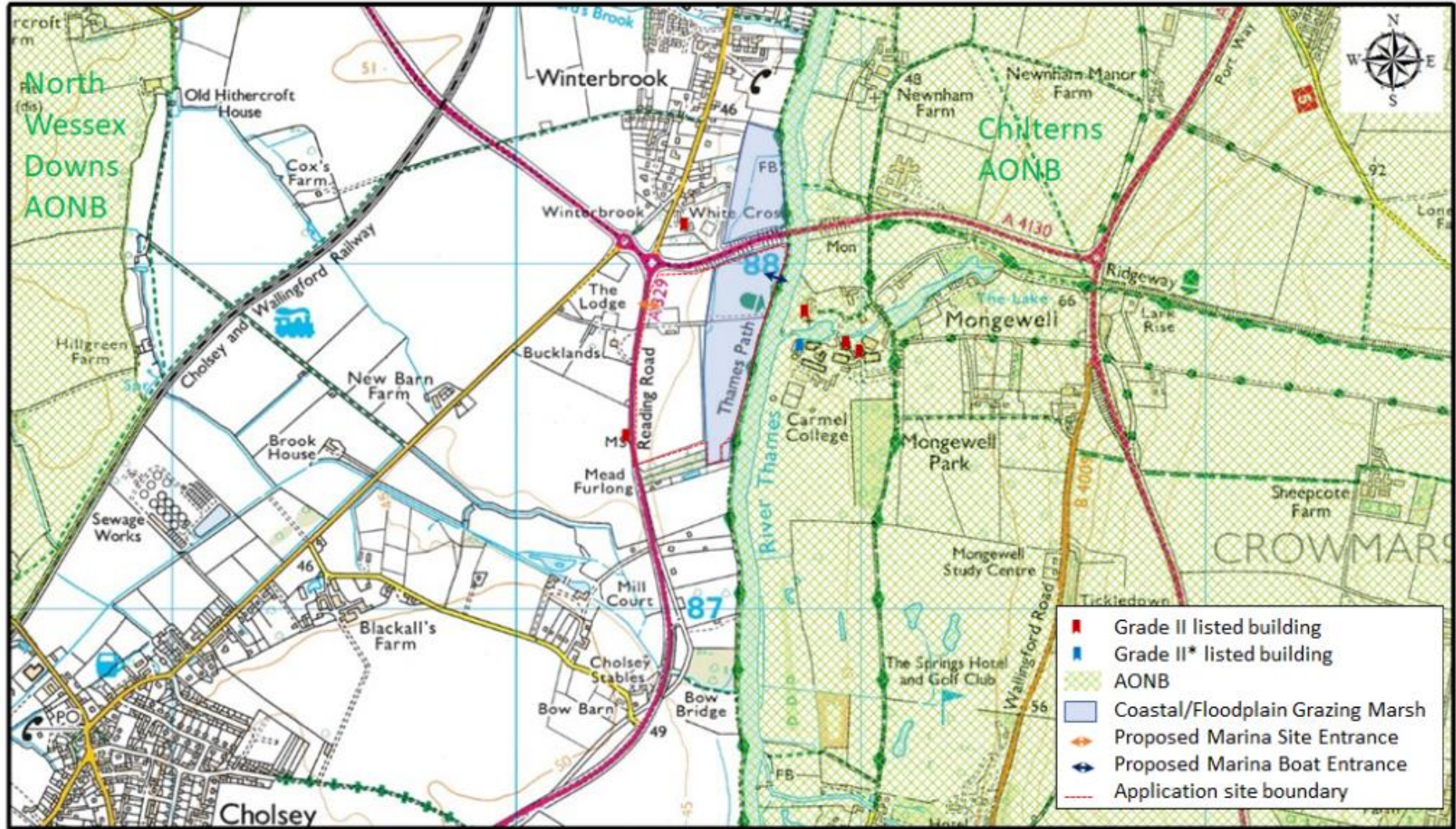
- offering a pre-application advice service, as was the case with this application;
- updating applicants and agents of issues that have arisen in the processing of their application, for example in this case the Flood Risk Assessment following a change to the Thames Model; and
- agreeing to extensions of times so that further information to overcome some points of objection may be submitted and reviewed.

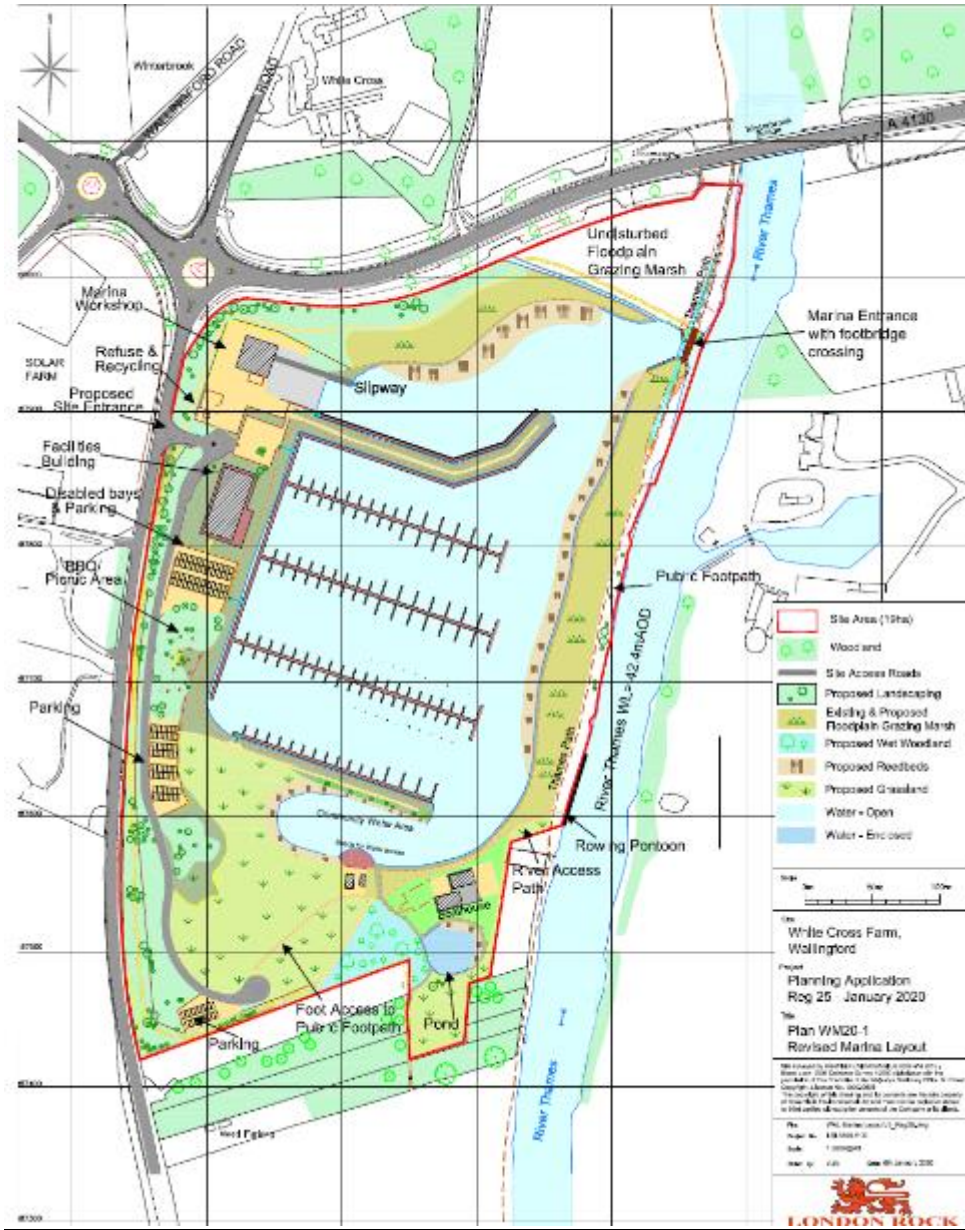
Annex 1 – Location Plan



Plan 1: Site Location outlined in red

Annex 2 – Site and Setting Plans





Annex 3 - Environmental Statement

1. An Environment Statement consisting of eighteen chapters was submitted as part of the planning application.
2. Chapter one is the introduction and sets out background to the planning application.
3. Chapter two contains the legislative background of the Environmental Impact Assessment and summarises the screening and scoping processes that took place regarding this development. It provides information on the significance criteria (non-significant impact – impacts not detectable, minor significant impact – impacts within accepted standards/limits, and major significant impact – impacts exceed acceptable standards/limits) and determining where mitigation measures would avoid, reduce or remedy any adverse effects.
4. Chapter three provides information on the existing site and its environment. It states the application are comprises mainly agricultural land that has been used for arable and livestock grazing purposes. The chapter also covers the topography of the site, flood zones, cultural heritage and archaeology, public rights of way, statutory and non-statuary sites with protective legislation nearby.
5. Chapter four summarises the proposed development.
6. Chapter five considers the alternatives – do nothing, alternative methods, alternative sites and alternative forms of development. Under the ‘do nothing’ scenario it is stated that the land would remain as agricultural land and occasional grazing for cattle. With ‘alternative methods’ it is stated that the marina basin could be excavated and constructed over a very short period, but this would remove time for processing and sale of the aggregates and may require excavated material to be deposited as inert landfill. In regard for ‘alternative sites’ it is stated that it is known that the Wallingford/River Thames area needs new facilities and that local marinas within 20km upstream and downstream are at full capacity. It summarises that a land search was undertaken with several requirements (river frontage, access directly onto local and national highway network, proximity to villages/ towns with accessible services and facilities, not being located within an environmental or historical statutory designation) and the site at White Cross Farm was identified. No information on whether any or sites were identified is provided but is stated that to the north the towns of Abingdon and Oxford already have existing marina facilities. Regarding ‘Alternative Forms of Development’ it is stated that the construction of a marina and mineral extraction are water compatible activates.
7. Chapter six focuses on surface water and flood risk impacts. It concludes that Sand and

gravel extraction is deemed a Water Compatible Development, and the restoration to a boating marina and range of nature conservation is also deemed water compatible and that the FRA modelling, undertaken in 2017, shows a small reduction in water level during the mineral extraction and the removal of material from the flood plain during the operational period will create additional flood storage. It also states that during the marina operations the assessment shows a reduction in water levels upstream of the site and a minor increase in water levels in the south-western corner of the site but these are small and so considered insignificant if assessed against accuracy of the modelling. The assessment concludes there will be no significant impact on surface water of flood risk and proposed no additional mitigation measures above those included in the design of the scheme.

8. Chapter
seven focuses on hydrology. The potential impacts of the proposed construction phase and the proposed long-term operational marina on the local groundwater environment have been modelled and assessed, which confirms that there will be no significant impacts on the local hydrogeological regime. It is proposed that groundwater levels will be monitored within boreholes around the construction phase due to the de-watering operations and that a water management scheme is prepared prior to commencement of the de-watering operations which the monitoring can be against.
9. Chapter
eight provides information on highways and traffic impacts based on 352 berths and was undertaken in 2017. The assessment concludes that traffic movement for the operational period have been forecast based on guidance in a Canals and Rivers Trust document and TRICS assessment. It is indicated the increase traffic would be in the remit of 60-110 vehicles per hour two way (additional 1-2 additional vehicles every two minutes in each direction). Against background flows on Reading Road this would be an increase of 10-15% during the weekend and around 60% of the average weekday flows. It is considered that the proposals would have no significant impact on the current highway network. It is also concluded that sufficient parking is provided as part of the development.
10. Chapter
nine provides information on noise. At ten noise sensitive locations predictions were made of the worst-case noise levels during normal operation and it is considered the proposed operations would not exceed the background rate by more than 10dB(A) and would also not exceed 55dB. It is concluded that is considered that the noise levels from the proposed operations will have no significant impact, and that noise levels will not rise above "noticeable" levels at the residential properties and other areas of concern within the vicinity of the site due to the very high background noise levels recorded and the proposed mitigation measures.
11. Chapter
ten considers air quality, focusing on dust and particulate matter. It is predicted that there will be no decrease in air quality due to the proposed quarry due to the prevailing wind direction and the on-site dust management systems.
12. Chapter
eleven provides information on the Landscape and Visual Amenity. the sensitivity of the landscape resources for both landscape characters to the proposed marina

development has been assessed as 'medium'. The overall magnitude of effect of the proposals has been assessed as low during the operational period and may have potential benefits post restoration. The assessment concludes that with appropriate mitigation measures there will be no significant impact on the landscape character or visual amenity as a result of the marina development. Several recommendations to assimilate the construction phase and marina development in the existing landscape are made, including progressive extraction, placement of screening bunds around the plant area, ensuring the buildings/structures are appropriately coloured/clad to blend in and 30 metres stand off to the River to maintain existing landscape.

13. Chapter twelve focuses on soils and agriculture. Around 50.6% (9.87 hectares) is limited to Grade 3b and 4 due to the regular frequency of flooding that covers the low-lying area adjacent to the River Thames. Around 48.1% (9.13 hectares) is classified as Grade 2 or 3a Best and Most Versatile (BMV). A minor area of the site was not surveyed due to the presence of the barn and hardstanding base. It is proposed the BMV soils could be sold to avoid wastage and enhance other agricultural development. It is also stated that the land is generally poor quality with only one field viable for agricultural crops and therefore alternative development is beneficial.
14. Chapter thirteen focuses on RAF Benson and aerodrome safety. The chapter states that the marina restoration concept, habitat management and mitigation measures have been designed with the aim of mitigating any potential bird strike hazard while enhancing opportunities for leisure, touring and areas for nature conservation and that lagoons during the mineral will be designed to be deep and steep sided to prevent marginal growth. A bird management plan has been prepared to address the mitigation and management of habitats on the site to prevent the risk of any bird strike incidents.
15. Chapter 14 considers geology and geotechnical impacts. It concludes that slope design is appropriate for the proposed development and as slopes will be backfilled within a few weeks of excavation there is reduction in potential for face failure during operation of the marina. The Factor of Safety for the designated slopes confirms that the proposed workings and marina design will have no significant impact on the geological environment.
16. Chapter 15 considers ecology and conservation impacts. Species specific surveys were carried out in 2015 and 2016. It was concluded that proposed development will have a minor significant impact on the local ecology. The mitigation measures proposed will ensure that there will be no impact on any identified protected species and it is considered that the operations will not have an impact on any designated ecological site near the operations. To reduce the potential impact to flora and fauna mitigation measures are proposed, including maintain appropriate margins to the River Thames, installation of bird boxes, mitigation and protection measures for reptiles and grass snakes.
17. Chapter 16 considers the cultural heritage and archaeology impacts. Regarding cultural

heritage it concludes that that the proposed development and marina restoration scheme are likely to result in no significant impact upon the heritage assets within the Wallingford area. In regard to archaeology it concludes that will no significant impact from the proposals on any features of archaeological interest but that soil stripping would be completed in phases and in consultation with OCC.

18. Chapter seventeen considers cumulative and combined effects. It states that no direct or indirect cumulative impacts in respect of the water environment, transport or highways, noise or landscape and visual have been identified.

19. Chapter eighteen concludes the Environmental Statement.

20. Further information was submitted as part of the planning application and additional 'Regulation 25' consultation was carried out. The additional information pertaining to the Environmental Statement includes:

- A review of the Environmental Statement (15th January 2020) containing information on surface water and flood risk, hydrogeology, landscape and visual amenity, soils and agriculture, ecology and conservation. The report concluded that following an examination of each area of potential impact that may have changed following the creation of a revised marina layout plant, the proposed scheme would still have no significant adverse effects on designated landscapes, designated areas of ecological or archaeological interest or other aspects of the local environment. It also states there would be an overall Biodiversity Net Gain compared to the existing/ current site conditions.
- An Ecological Appraisal (December 2019) to provide an update to the ecological assessment and surveys undertaken by Pleydell Smithyman in 2016. It confirms that with no significant changes in ecological status, the conclusions and recommendations of the 2016 study are appropriate and robust.
- A Highways Technical Note (29th June 2020) which reviewed the data used in the original assessment and responded to the comments of the OCC Transport Team.
- Flood Risk Assessment Report (13th July 2020) which concludes that the impact of the restoration phase of the mineral workings to flood risk at the site and adjacent land will be negligible.

Annex 4 – Consultation Responses Summary

Local Member, Councillor Gray

No comments received

Wallingford Town Council

Further Comments (August 2020)

Wallingford Town Council maintain their objection to the application. If the application is granted a robust financial provision such as an escrow account must be made as a condition of planning consent and that this should be in place prior to commencement. The scheme from sand/gravel extraction to an Offline River Thames Marina Basin must be completed within 5 years of commencement.

Initial Comments (June 2018)

Joint response with Cholsey Parish Council

The councils object to the development due to the wide range of negative impacts arising from the proposed extraction and the restoration to a marina are not outweighed by its benefits and therefore the development is unacceptable. These include:

- Impact on Ecology and loss of biodiversity associated with loss/disruption of Biodiversity Action Plan Priority Habitats, 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 Cartmel 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 of use local pub/restaurant as they would take their boat elsewhere, impact on RAF Benson, creation of few jobs, devaluing of Thames River Path
- Viability of marina creation leading to no site restoration

Crowmarsh Parish Council

No comments received

Cholsey Parish Council

Joint response with Wallingford Town Council, see above

South Oxfordshire District Council

Further Comments (August 2020)

The Council maintains its objection to the proposal on all grounds mentioned in previous correspondence. In our opinion, the social and economic benefits of the proposal would not outweigh the environmental harm.

Further Comments (February 2020)

The **Planning Officer** comments that the revised plan does not address any of officer's concerns and there is very little change in the revised layout plan compared to the original. In terms of the Economic Impact Assessment, the officer write that any benefits listed still do not outweigh the harm as per the previous letter.

Initial Comments (June 2018)

The **SODC Planning Officer** suggests the proposal is not in accordance with Oxfordshire Waste and Minerals Local Plan Part 1 – Core Strategy Policy M4. She notes that the Policy R9 of the SOLP specifically refers to recreational development associated with the River Thames and that this policy is clear that new moorings will not be permitted. The policy also requires that water sports activities should develop at existing sites rather than new ones. The officer also considers there has been no demonstration of the different users of the site would interact and whether there would be any conflict or increased congestion. Regarding landscape, the officer comments that the Local Plan Policies seek to maintain the special character and tranquillity of the River Thames and that the landscape is to remain unspoilt. This officer does not consider the development does this.

It is noted that comments about Noise, Odour and Dust have already been received, though it is questioned how enforceable to recommendations made in the reports are. In relation to Air Quality, it is noted that the Air Quality Report looks at dust and particulate matter only and does not make any reference to the nearby AQMA in Wallingford which was declared for nitrogen dioxide. Due to the site and location of the proposed development it is recommended more detailed air quality monitoring is carried out. In relation to land contamination, concerns are raised regarding the potential impact of the development on a private water support to the south of the site.

The SODC Planning Officer recognises that building a strong economy is one of the key strands of sustainable development as set out in the National Planning Policy Framework. The officer acknowledges the comments of the SODC's Economic Development Team which state that the proposed marina would potentially enhance the visitor offer for Wallingford and the wider District and provide opportunities and improve occupancy rates in local hotels and that on this basis.

Overall, the District Council recommends refusal of the planning application.

The SODC Landscape Officer, Tree Officer, Heritage Officer Urban Design Officer, Flooding and Drainage Officer, Economic Development Officer, and Crime Prevention Design Advisor (TVP) have also provided comments as part of the SODC planning response. These are detailed below

The **SODC Landscape Officer** considers submitted LVIA gives insufficient weight to the high sensitivity of recreational users of the River Thames and the Thames Path; the special character of the River Thames which offers beauty, tranquillity and wildness at this location; the role of the site as the countryside setting between Wallingford and

Cholsey and the potential for the coalescence of settlements; and the important role of the site in providing a setting for both the Chilterns and North Wessex Downs AONBs. Although the LVIA concludes that there would be no adverse visual effects on receptors because a marina would not look out of place in the location and setting of a riverfront site, the Landscape officer comments that notwithstanding that a marina would typically be located on a waterway and would not be an unexpected view, the change in visual amenity from a natural riverbank to a large-scale marina and industrial looking buildings would have a significant adverse effect on the visual amenity recreational users of the River Thames and National Path. The impact of lighting remaining on during the hours of darkness is also likely to impact the visual quality of the setting of the two AONBs. Overall, she considers the development is contrary to landscape policies and the NPPF.

The **SODC Tree Officer** has made comments regarding the date of the tree survey. He considers the development is potentially going to have a negative impact on the landscape, but if developed a landscaping scheme and management plan will be essential to reduce the harm. This will need to include planting at the outset around the boundary to boost the screening value of the existing vegetation, and then further phases of planting to address the impact of the new buildings and associated works.

The **SODC Heritage Officer** consider that the extraction and the proposed marina development will result in some loss of the open rural character that forms the setting of the heritage assets of the Gottlieb Gallery and former Church. As existing, the officer comments that the setting of the heritage assets contributes positively to their significance, emphasising their designed and intended presence within the riverside landscape and it reinforces their rural setting. With regard to the tests of the NPPF he considers this harm to be low and not more than less-than-substantial. However, steps to fully mitigate any harm must be taken and any residual less-than-substantial harm must still be demonstrably outweighed by public benefits, as per the tests of paragraph 132 and 134 of the NPPF.

The **SODC Urban Design Officer** comments that more thought needs to be given to the 'sense of arrival' for both motorists and pedestrians/cyclists. He considers the carpark, refuse and recycling area and rear façade of the facilities building do not create an attractive entrance to the site. He also comments that pedestrian and cycle access has been pushed to the periphery of the site and does not encourage access by foot or bike. He questions whether more could be made of the pedestrian bridge and grassed area in front of the facilities building. He also comments that no details of the building materials, hard surface materials or boundary treatment have been provided and that these will have a significant impact in terms of the attractiveness and quality of the development and will help determine whether a high-quality development is being delivered.

The **SODC Flooding and Drainage Officer** raises no objection subject to conditions and informative. The Flood Risk Assessment identifies that the proposal relates to water compatible development and is therefore appropriate for the flood zone. The modelling provided as part of the application confirms a negligible difference in flood risk as a result of the proposed development. The planning statement confirms that the existing flood relief culverts and swale under the A4130 will be retained and it is recommended activity in this area is controlled via condition to maintain the flood relief channel. It is also recommended that no materials is stockpiled in an area liable to flood. Given the location of the development on the edge of the flood plan it is recommended the floor levels of non-water compatible buildings is set 600mm above the associated flood level of the River Thames. It is commented that significant volumes of silt will be created during the extraction and washing process and a plan for the management of this should thereby be provided to reduce the risk of silt entering the water course. It is also recommended that

further details of surface water drainage is provided prior to each phase of the development proceeding and that details of foul drainage should be provided prior to the commencement of the development.

The **SODC Economic Development** Officer is supportive of the proposed development.

The **Crime Prevention Design Advisor** raises no objection to the proposed development but express some concerns in relation to community safety/crime prevention design. He recommends the inclusion of a condition to ensure that measures are incorporated.

Natural England

No further comments received

Comments (February 2020)

Natural England objects to the proposed development as they consider it would have a significant impact on the purpose of designation of the Chilterns AONB. They consider that the nature and scale of the proposed development would have a significant negative impact on the statutory purpose of the Chilterns AONB. Of concern is the detrimental impact on the experience of users of the Thames Path National Trail as they walk within the setting of the AONB.

Natural England have also provided advice in relation to Best and Most Versatile Agricultural Land. They comment that they are not satisfied that the site working and reclamation proposals provided in support of this application meet the requirements for sustainable minerals development. The minerals working and marina construction will involve working of best and most versatile agricultural soils but the methods used in the restoration and aftercare do not enable the land to retain its longer-term capability, since BMV soils will be exported for sale. They advise adoption of loose-handling methods for soils to minimise damage to the soil structure and that should the development proceed they are satisfied the Soils and Agricultural Land Classification report constitutes a satisfactory record of the pre-working physical characteristics of the land within the application site boundary.

Lastly, Natural England question the conclusions of the update to the ecological appraisal, in that they do not consider the proposals to result in biodiversity net gain. They advise that the application of the biodiversity metric is scrutinised, taking into account the design and nature of the open water habitats which will be in use as a marina, as well as the status of the Floodplain Grazing Marsh as a Habitat of Principal Importance.

Environment Agency

No further comments received

Further Comments (March 2020)

The Environment Agency consider the revised detail does not satisfactorily address their earlier concerns and we therefore maintain their objection.

They also state there are several other matters of concern which were not highlighted in their previous response and object to the development on these points.

Since they previously commented on the application, new flood modelling for the Thames has been carried out and flood risk in this location has increased. They do not consider the submitted FRA complies with the requirements for site-specific flood risk assessments. They also comment that a development of this size should connect to the main Thames Water Foul network. In relation to water quality, they consider there is a lack of detail that construction will not cause pollution or unnecessary impacts to the water environment,

especially relating to the clay barrier and concrete/ sheet piling proposals for the marina entrance. While this is referred to in section 5.2.5 of the Geological report and geotechnical review the assessment of risk and potential mitigation measures to reduce pollution risks and impacts are not provided. They also consider that the cumulative impact of the proposed development and quarry at New Barn Farm should be considered and assessed. Lastly, they comment that the proposed description is for an off-line marina but the plans appear to show this is not the case. The marina will be considered on-line unless there is a system in place to control water levels within the marina.

Initial Comments (September 2018)

The Environment Agency object to the proposed development as submitted because of the adverse impact it would have on nature conservation and recommend that planning permission be refused on this basis.

They consider the proposals would have an unacceptable impact on the nature conservation value of the site, including floodplain grazing marsh, a habitat of principal importance listed under Section 41 of the Natural Environment and Rural Communities Act 2006. They state that the proposed development would lead to the permanent loss of floodplain grazing marsh within the site and the loss of lengths of wet ditch within the Thames Wallingford to Goring Conservation Target Area and that to mitigate the potential impacts of bird-strike on the nearby RAF Benson, the large-scale marina is designed to be deliberately unattractive to wildlife, incorporating such features as steep banks and deep water to prevent any marginal vegetation establishing. They comment that with the exception of a relatively small area of recreated 'floodplain grazing marsh' in the north of the site (with little detail about its creation or expected successful establishment), there is little attempt to mitigate or compensate for the loss of the existing floodplain grazing marsh, which means the proposal would result in a net loss of biodiversity.

The Environment Agency also provide information on overcoming this objection and request consideration is given to the whether the buildings, particularly the rowing boat house in flood zone three, can be safe and operational in times of flood.

Sport England

Further Comments (August 2020)

Sport England are disappointed that the community water area has reduced in size significantly. It would, therefore, encourage that the applicant reconsiders the scale of this reduction. However, overall, Sport England does not consider that the additional documentation/amendments submitted significantly affects its position on the proposal therefore Sport England 's comments submitted on 26th November 2018 are still applicable in relation to this application.

Further Comments (January 2020)

Comments sent in November 2018 are still applicable

Initial Comments (November 2018)

Sport England consider that the inclusion of watersport facilities within the development is broadly consistent with Sport England's Planning Policy therefore they would not object to the proposal. Sport England, however, would advise that advice from British Rowing and British Canoeing (included in their response and summarised below) is considered.

Comments from British Canoeing and British Rowing

- Consideration should be given to people paddling to, from or via the canoe, kayak area, such as those who may be inclined to stop and spend money (parking, refreshments etc).
- The 'launch for Rowing club' on the River Thames side is welcomed although it is important that this a public launch for all as it would be useful to allow people journeying to, from or via the area to have this as an option to land here and access the main site.
- An area to secure store/lock boats would allow users to use the wider facilities proposed and travel further afield. The more 'open to all' this site is, the more paddlers would be inclined to spend time and money which could then be reinvested into the site. The store could be located within the rowing boathouse.
- An 'operational' consideration is to avoid charging excessive launch fees for private canoes or kayaks from this site as, if it is prohibitive, users would travel elsewhere and launch where there is no cost. Although, if there is public access to showers, changing rooms etc, people would likely accept some charge.
- Potentially consider a 'boom' with a stirrup gate so that large boats cannot enter the watersports area but canoes and kayaks can get through the gap and out of the Marina onto the Thames.
- Parking next to the watersports centre would useful so there is limited distance to carry equipment to the water, especially if users wanted to launch their own boat. Revenue may be gained from paddlers parking here for the day and journeying downstream

OCC Landscape

No further comments received

Initial comments (February 2020)

The OCC Landscape advisor considers the proposed marina development to cause unacceptable harm on landscape character and visual quality, and to be contrary to national and local planning policy and guidance. She raises an objection to the proposed development.

Despite traffic noise from nearby roads being audible (especially the A4130) she considers the application site to be rural in character and to reflect many of the characteristics outlined in relevant landscape character assessments. She disagrees with the conclusions of the LVIA and consider that overall the landscape character and visual impacts have been underestimated. She believes this is due to a combination of underestimating the sensitivities of landscape and/or visual receptors and an underestimation of the magnitude of impacts. She also believes that insufficient consideration is given to the site's role as a setting to the AONBs, the character of the River Thames corridor in this location and to users of the National Trail and the River Thames. Although the proposed mineral extraction would be temporary, the creation of the marina will comprise a permanent loss of characteristic habitats and features and will fundamentally change the local landscape character and views. She states that the marina does not only comprise a waterbody as stated in the conclusions of the LVIA but will introduce buildings, car parks, lighting, noise, vehicle movements, pontoons and a large number of boats into the area, all of which will fundamentally change the character of the local landscape and views. She is also convinced about the feasibility and long-term survival of some of the landscape elements (e.g. floodplain grazing marsh, reedbeds) as some are narrow are expected to come under

pressure from recreational uses and will have particular management challenges (e.g. grazing).

OCC Ecology

No further comments received

Further comments (April 2020)

The Ecology Officer has reviewed the updated survey report and can confirm she is satisfied with the scope of surveys. Given the timing of the request for updated information, the TVERC impact calculator has been used and is accepted, rather than the updated Defra 2.0 metre.

The officer comments that the surveys confirm that the majority of the site remains unchanged. The working of the site as a quarry is not of significant ecological concern in itself. The impact of the proposed scheme arise primarily from its restoration to a marina. A modest net gain in biodiversity has been calculated, however the officer comments that the marina site is designed for recreational purposes and not for biodiversity. A key concern remains in respect of the loss of Priority Habitat, the floodplain grazing marsh, which will be required to facilitate this scheme. The officer comments that additional biodiversity benefits will need to be established, for example through the use of planting of known benefit to wildlife such as pollinators, artificial roost features and long-term ecological management of areas closed off to the public.

The officer also highlights several points that require further clarification. This includes whether the black poplar would be retained; whether works to make the marina entrance acceptable would require the loss of further habitat loss (this would likely be unacceptable); confirmation on whether EIA screening was required for the change of the grassland to arable land; and the inclusion of the additional of hedgerow planting into to biodiversity net gain calculator.

A number of conditions are recommended should planning permission be granted. These include the provision of an Environmental Management Plan for biodiversity to encompass the extraction operations, updated protected species surveys, a long-term Ecological Restoration and Management Plan and Biodiversity Monitoring and Remediation Strategy.

Initial comments (June 2018)

Concerns were raised relating to the age of the survey data and overall net loss of biodiversity within the site. Further information is requested.

OCC Rights of Way

Further Comments (August 2020)

The previous comments from 2018 are still valid. From a public rights of way perspective, the proposed development respects existing public rights of way, including the Thames Path National Trail - and aims to enhance access with the provision of a free to use circular footpath within the site and integrate public rights of way with appropriate and necessary bridges. During extraction and construction works it should be conditioned that there are adequate visual, acoustic and dust/debris screening if the site from nearby public rights of way.

The Thames Path must remain fully open as a riverside route during the development period, apart from the shortest possible time when footbridges are installed. Even then, the status of the route as a national trail means that a suitable and safe temporary bridge boardwalk or floating pontoon access should be provided.

Given the additional free access proposed to be available to the public, and provided there are suitable protections for amenity put in place, then no objections are raised to the proposal from a PRow perspective.

Initial comments (June 2018)

No issues are raised with regard to mineral extraction at the site as any impacts of visual amenity, dust and noise can be reduced by maintaining effective natural vegetation as screening. As no excavation is proposed within a wide corridor of the Thames Path National Trail it is considered the path's integrity will be maintained.

The major issue raised relates to construction of the proposed footbridge at the marina's river entrance. This will need to be to DMRB standards. During the bridge construction phase there will need to be a temporary diversion put in place – and this should provide as little disturbance to users of the Thames Path National Trail as possible. It is suggested that a temporary suitable footbridge over the drainage ditch could be installed away from the site of the new bridge which means the pilings and other works could be carried out before the major watering and access creation measures. If the new footbridge can be constructed and installed before the marina river entrance is constructed then this would significantly reduce the level and duration of disturbance on Thames Path National Trail users. The officer states he cannot comment on the technical feasibility of this approach but comments that without it there would be major disruption to the route and amenity of the Thames Path National Trail while the entrance cut is constructed, the marina watered and then the footbridge constructed.

The officer also comments that the route of the Thames Path National Trail should be suitably and sensitively improved in liaison with the TMNT Manager. These improvements should extend outside of the site to junctions with other PRow, especially north to Nosworthy Way. These improvements may extend to bank repairs, drainage and low-impact surface works, seating, gates and signage etc in order to mitigate the increase in traffic from people using and visiting the development.

OCC Trees

No further comments received

Initial comments (February 2020)

The officer objects to the application as the arboricultural survey is out of date as described in its own limitations and it is not clear whether a significant tree, a black poplar (T53) can be retained. Should the application be permitted he requests that proposals are made to retain the significant tree (T53), a separate arboricultural method statement is prepared before the development commences and qualified arboricultural advice will be sought if service trenches and utilities are to cross tree root protection areas

OCC Archaeology

Further Comments (August 2020)

The submitted amendments do not alter the original comments.

Initial Comments (June 2018)

The Archaeology Officer comments that the site has been the subject of a geophysical survey and a trenched evaluation which recorded a number of archaeological features in the northern part of the site. Nine undated pits or postholes were recorded as well as a small amount of prehistoric pottery and a Mesolithic/Bronze Age flake were found. The pits/postholes were undated but thought to date to the later prehistoric or Roman period. As the development will impact these identified archaeological features the officer

recommends that should planning permission be granted the applicant be responsible for ensuring the implementation of a staged programme of archaeological investigation during the period of construction which is secured via condition.

OCC Transport

No further comments received

Initial comments (June 2020)

OCC Transport object to the proposed development due to insufficient information regarding the end use of the Marina function in terms of tracked drawings for trailered vessels, jeopardising the access arrangement and insufficient information regarding the use of the Marina function during the week. The closeness of access and egress to roundabout and visibility splays provided at the accesses is not shown and it is suspected to be sub of standard. Weekday modelling is required of nearby roundabouts on the Wallingford 'bypass' is required for this quantum of development.

They comment that each element of the project takes access from the A329 and the quarrying project, additionally, takes egress from the A4130 (Nosworthy Way). They consider that the recommendations from the pre-app have not been followed or not considered acceptably. They also note the data is over three years old. They advise that the access issues have led to the recommendation of an objection and the issues potentially have 'severe' consequences for the proposed development's influence on the highway network.

SODC Environmental Protection

No further comments received

Initial comments - Noise, Odour and Dust (May 2018)

The officer has considered the matters relating to noise, odour and dust and provided the works are carried out in accordance with the recommendations specified within the reports has no objection to make.

Ministry of Defence

Further Comments (August 2020)

The MoD has no objection to the amendments and their previous comments remain extant. They still note their requirements for the restoration and aftercare and look forward to future correspondence as the application progresses.

Initial Comments (July 2018)

The MOD has no safeguarding concerns with regards to the proposed heights of the development and airstrike. The principal safeguarding concern of the MOD in relation to mineral extraction, is that the creation of new habitats may attract and support populations of large and, or, flocking birds close to the aerodrome and increase the risk in bird strike to aerodrome operations. In principle the MOD has no safeguarding concerns subject to the confirmation on monitoring being daily or annual, amending the trigger levels for geese from 50 to 20 with zero tolerance breeding feral geese and signage to stop public from feeding birds being implemented as part of the legally based Bird Strike Management Plan.

Historic England

Further Comments (August 2020)

Historic England consider the revised proposals appear to do very little to address the concerns previous detailed. They write that it seems eminently possible that a much-improved landscaping design could be achieved but has not been explored. They continue to raise concerns about the proposals covering the same points previously made. They encourage the Council, where it is minded to approve the proposals, to seek to secure meaningful visual screening along the western bank of the river between the development site and the nearby listed structures at Mongewell Park which would go some way to mitigating the harm of the proposals.

Historic England has concerns regarding the application on heritage grounds. They consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 190, 194 and 196 of the NPPF and draw attention to the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990

Initial Comments (June 2018)

Historic England has raised concerns regarding the application on heritage grounds due to its proximity to the Former Carmel College, Mongewell Park. They highlight that the proposed development would be visible from the Grade II* Gottlieb Gallery and Boathouse and to a lesser extent from the grade II ruin of the Church of St John the Baptist as there are gaps in the trees which allow reasonable clear views across the river. They consider that gravel extraction would dramatically change the character of the development site and consider the heritage statement misunderstands the significance of the church and underestimates the role of the rurality in the setting of buildings. They also consider the marina itself would compromise the idyllic rural riverside setting of these listed buildings.

They consider that the proposals do not minimise the conflict between the conservation of nearby historic assets as required by paragraph 129 of the NPPF as the landscaping on the riverbank could be improved. Furthermore, they consider that 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 132 and 134 of the NPPF at present as part 2 of the Oxfordshire Minerals and Waste Local Plan has yet to be prepared and the relative merits of all potential sand and gravel extraction sites properly evaluated.

North Wessex Downs AONB

No Comments Received

Chilterns Conservations Board

Further Comments (August 2020)

Resubmitted original comments

Initial Comments (June 2018)

CCB notes that the application is for sand and gravel extraction with inert fill prior to the implementation of the marina. The planning statement makes the point (10.3.1) that the business model is based on the assumption that sand and gravel will be extracted. The planning authority should, in the judgement of CCB, determine this application on the merits of the proposed Marina. Whether or not this site is suitable for sand and gravel extraction should not be a relevant matter in the creation of a post-extraction marina because ordinarily restoration would involve a return to agricultural use.

CCB raises objection on the landscape impacts, the setting of the Chilterns AONB, it being contrary to the development and the AONB management plan. They consider the LVIA fails to give appropriate weight to the setting of the AONB

The CCB consider the development harmful to the AONB and falling significant short of the policy and the legislative duties that attribute great weight and importance to the conservation of landscape and scenic beauty within and affecting an AONB. In this case they consider the special qualities of the AONB are manifest in the landscape character setting and boundary configuration of the River Thames and the relationship between the Thames and Central Vale character areas. They comment that development proposed here is major and of substantial magnitude involving a land-use change that is out of character and discordant and with a manifestation of inappropriate development covering a refuelling office, café, toilets, 220 car parking spaces, 320 berths, security fencing and CCTV cameras. They state that application cannot possibly satisfy policy and would be significantly harmful to the enjoyment of the Chilterns, whether walking within it (especially in Mongewell) or when walking the Thames Path and in the appreciation of its riparian AONB setting. The further comment that application papers generally conclude that this proposal has a benign effect on landscape character and visual impact which they consider cannot be correct.

Thames Water

No Further Comments received

Initial comments (June 2018)

Thames Water advise that the with regard to Foul Water sewage network infrastructure capacity, they would not have any objection to the above planning application, based on the information provided. The application indicates that surface waters will not be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should this change, Thames water would need to review their position.

In relation to water usage, Thames water consider insufficient information has been provided by the developer to determine if the water network has capacity to supply this development. The description includes details of a cafe, toilet/shower block and laundry facilities but Thames Water have been unable to ascertain the water demand for these and therefore and unable to confirm if capacity is available. The developer is therefore asked to work with Thames Water to ensure there is no detriment to the existing water network.

University of Oxford

Further Comments (August 2020)

The further information does not alter the University's position on the proposal. The comments send by letters dated 18 June 2018 and 14 February 2020 are still applicable

Further Comments (February 2020)

The University of Oxford expresses disappointment that no changes are proposed to the location of the marina entrance and consider the applicant has not investigated or given any consideration to the safety concerns raised. They therefore request the County Council refuse planning permission for the application as the proposed location of the marina entrance is located at a dangerous point, at the north end of the application. They consider there is a risk of serious collisions occurring between boats exiting the river and those already on the River Thames, such as rowing eights travelling at speed down the Thames at this point.

Initial Comments (June 2018)

The University of Oxford expresses concern about the safety of both rowers and boaters on the River Thames. They comment that this is an important stretch of the Thames for crews as there is measured course of 2km that starts to the north of the application and

continues downstream towards Goring Locks. They consider the statement that two rowing clubs (Wallingford and Oxford Brookes) being located downstream of the entrance and therefore not impact is incorrect. They comment that boats leaving the marina will have their site lines upstream impeded by the bridge and the curve in the river and will have little time to see and therefore react to a rowing boat traveling downstream. Both narrow boats and are rowing eights are steered from the stern further impeding visibility.

The University also comments that safety is further compromised by the inclusion of a possible rowing club on the site of the proposed marina itself, downstream of the entrance/exist which would future increase traffic in the area. They comment that the process of crews landing and setting off from a landing stage would mean greater distribution of other traffic on a narrow section of river. Rowing boats have to land with their bows facing upstream which means that any boat would have to cross to their left side into the oncoming river traffic navigating downstream on the right hand side.

Overall, the University of Oxford request that no decision is made until the matter of safety at the exit to the marina and the landing stages for a possible rowing club is fully investigated and consideration given to radically amending the design of marina, especially its exist in view of these safety concerns.

Oxford Brookes University

No further comments received

Initial Comments (June 2018)

Oxford Brookes University expresses concern over the safety of boaters on this stretch of Thames. They note the applicant has acknowledged there are three rowing clubs in the vicinity of the site but do not consider the applicant has demonstrated an adequate understanding of the nature and scale of the actives associated with these rowing clubs. They comment that at busy times there can but upwards of 25 eights rowing past the application site and that these boats, when travelling at full speed downstream, can attain speeds of 15-20 mph. The proposed entrance would be part way along a measured stretch for rowing assessment and boats do pass the proposed site entrance. They consider the statement that two rowing clubs (theirs and Wallingford) being located downstream of the entrance and therefore not impact is incorrect. They comment that boats leaving the marina will have their site lines upstream impeded by the bridge and the curve in the river and will have little time to see and therefore react to a rowing boat traveling downstream. Both narrow boats and are rowing eights are steered from the stern further impeding visibility.

Overall, Oxford Brookes University request that no decision is made until the matter of safety at the exit to the marina is fully investigated and consideration given to radically amending the design of marina, especially its exit, in view of these safety concerns.

OCC Public Health

No further comments received

Initial Comments (June 2018)

The officer has concerns about the dust from the development having a negative impact on nearby residents and that it will be greater than estimated in the air quality assessment. He considers detailed plans are needed about how the applicant will monitor the effects of dust and also wind levels which will impact on the spread of dust to local residents and more detail and assurances will be required regarding the dust mitigation plans for both operational and non-operational hours of the site

Ramblers Association

No further comments received

Initial Comments (June 2018)

The Rambles Association requests there be minimal disturbance to the Thames Path while the footbridge is being built.

CPRE

Further Comments (August 2020)

CPRE South Oxfordshire add to their original comments highlighting the risk of pollution, landscape impact and existing use of the river. They also comment that for a time in April and May 2020 wildlife on the river has thrived and would be harmed by the additional motor craft.

Initial Comments (January 2020)

CPRE South Oxfordshire object to the application. They consider the Thames corridor is a unique and valuable resource which provides a recreational resource for long distance walkers and local residents. They state the development would damage the character and beauty of both the local and regional landscape. They comment on the existing biodiversity value of this part of the river and its floodplain and its role in storing carbon. They consider major gravel workings would damage to wildlife and the nature and character of the riverside landscape and comment that the development of the marina would cause additions damage and disruption. They state the car park and buildings would be both intrusive and disrupt to operation of the flood plain and the inevitable lighting would disrupt any remaining wildlife and the presence of 200 plus boats and cars so close to the river would be a continuing threat of water and air pollution.

Boys Brigade Rowing Club

Further Comments (August 2020)

Further to their previous comments, the **Boys Brigade Rowing Club** comment that dealing with the fallout from COVID-19, has highlighted how essential it is for the young people in the Wallingford area to have an area which they can call their own.

They note that part of this planning application includes a proposal for facilities for young people to be engaged in water-based activities in a safe and controlled environment. The comment that warm weather and young people with nothing better to do has resulted in many young people taking to launching themselves from Wallingford Bridge and lazing about on the river. Although they consider that lazing about on the river is not necessarily an issue, a facility providing safety training to young people will help them avoid many of the dangers, especially those posed by other river users.

They again state support for the application for they benefit it would bring to the population as a whole.

Initial Comments (January 2020)

The Boys' Brigade Rowing Club support the application. They are seeking to provide a community resource to provide young people in the South Oxfordshire area with a location where they can pursue activities on the river and also to provide a location where young people can undertake bush and field crafts and undertake environmental studies and practice conservation. They have searched for a permanent base on the river for a number of years. The organisation already run actives on this area of river so would not add additional traffic and consider relief over congestion of Ferry Lane may be provided.

They comment that the proposed plan provides for an area of community space including an area of wet marsh and a pond. These features would provide an ideal environment for the provision of environmental studies. The community area within the lagoon will also provide an area where safety and rescue training can be conducted removing some further traffic from the main river.

They comment that the land is not within the AONB and is currently strewn with structures and infrastructure in decay. They consider the plan will add to the nature of the area and believe the benefits outweigh the negatives.

Open Spaces Society

No comments received

River Thames Society

No comments received

Chiltern Society

No comments received

BBOWT

No comments received

Annex 5 – Representations Summary

1. Twenty-five representations from members of the public were received. Fourteen of these object to the proposed development, eight are in support and the remaining three are considered to be of neutral stance. The points raised are summarised below.

Support (8)

- Valuable community asset
- Positive for social and physical well being
- Facilitate learning new skills
- Provision of local service
- Provision of employment
- Develop an area in decay

Neutral (3)

- Materials should be imported and exported by water
- No guarantee of public use

Objection (14)

- Conflict with rowing and other users of the River Thames for recreation
- Impact to Thames Path National Trail and recreation in area
- Marina not needed
- Gravel not needed
- Harm to AONB
- Loss of tourism and harm to economy
- No guarantee that marina will be built
- Disturbance, harm and loss to the flora, fauna and habitats
- Damage to the Riverbank
- Harm to listed buildings
- Flood risk
- Disruption of mineral extraction (Adverse impact of human health, residential amenity from noise, dust, visual intrusion, light pollution, traffic and air quality)
- Accuracy of wind direction analysis
- Highway capacity and safety
- Harm to water quality from extraction and marina operation (e.g. fuel contamination)
- Built development is extensive and unsuitable in the area
- Size of the Marina
- Visual impact of mineral extraction and marina
- Change to the character of the land and nature of the river in the area
- Risk of Bird Strike
- Combined impacts of gravel extraction with site adjacent to Wallingford Road
- Contrary to policy
- Public use is not guaranteed
- Materials should be exported by water

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 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.

Our records, survey results and consideration of the habitats within the site area indicate that, with appropriate mitigation, European Protected Species are unlikely to be harmed as a result of the proposals.