

SUBMISSION BY CAGE
(Communities Against Gravel Extraction)

relating to the inclusion of the area close to Cholsey & Wallingford as suitable for sand and gravel extraction
SG33, SG57 & SG60

CAGE represents the views of and is supported by the following local councils

Cholsey Parish Council
Wallingford Town Council
Aston Tirrold Parish Council
Aston Upthorpe Parish Council
Brightwell-cum-Sotwell Parish Council
North Moreton Parish Council
Moulsford Parish Council

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1. Summary

CAGE objects to sand and gravel extraction in the Cholsey and Wallingford area as it would seriously harm the local economy and the important amenity value of the area both in the short term and the long term. It has identified a significant number of constraints on extraction in this area that would not appear to have been previously considered in the Oxfordshire Minerals Planning Strategy Consultation (OMPSC). The professional appraisal commissioned by CAGE confirms that the Cholsey and Wallingford area is the least suitable of the areas identified in South Oxfordshire for gravel extraction.

CAGE is also concerned that the OMPSC appears to lack any logical progression from earlier consultations in 2010 and has resulted in the selection of a single precise new area for sand and gravel extraction in South Oxfordshire, based on rationale that appears flawed and information that may be incorrect.

The process has apparently relied heavily on the information provided in Site Nomination Forms by mineral companies and landowners, and not on any strategic appraisal by Oxfordshire County Council (OCC). Only sites put forward in this way have been considered.

The OMPSC plan is so specific in its selection of one new area in South Oxfordshire that it provides no flexibility to consider alternative areas, should the chosen area be found on detailed analysis to be either unsuitable or too small to meet OCC's requirements.

CAGE's research casts considerable doubt on the correctness of the decision to propose the Cholsey/Wallingford area as suitable for sand and gravel extraction, which appears to be based on the belief that the site is:

- the least constrained;
- has good access to the lorry route network;
- and is closer (by road) to areas of demand for construction materials in southern Oxfordshire

(Source: Paragraph 19 of the County Council's report to Cabinet of February 2011)

This submission demonstrates that these conclusions are fundamentally flawed, and CAGE believes that alternative, less sensitive, sites should be considered, if indeed a new site is required in the district. CAGE's principal concerns, together with reference to the relevant OMPSC *Common Core Policies for Minerals and Waste*, are that:

1. It would severely harm the character of the land between two large settlements, Wallingford and Cholsey. (*Policy C5*)
2. It would adversely affect the setting of the North Wessex Downs AONB and Chilterns AONB. (*Policy C5*)
3. It would destroy valuable undisturbed geological history. (*Policy C6*)
4. It would be contrary to *Policy C1* as two of the sites, SG33 & SG57, are subject in part to flooding and one, SG60, which abuts the River Thames, is almost entirely subject to river flooding.
5. It would be contrary to *Policy C2* as there may be risks of contamination to the groundwater from Cholsey Sewage Works.
6. It would mutilate the preserved setting of an historic Saxon town and ancient village and destroy its landscape archaeology. (*Policy C6*)
7. It would affect the setting of two Grade II listed buildings and threaten the future existence of one of them. (*Policy C6*)
8. It would harm important popular rights of way. (*Policy C8*)
9. It would severely threaten the existence of a heritage and tourist railway.
10. It would adversely affect OCC's approved cycle path between Wallingford and Cholsey. (*Policy C8*)
11. It would adversely and directly impact on the lives of some 10,000 people living in Wallingford and Cholsey. (*Policy C3*)

12. It would damage the local economy and tourism and be contrary to the District and Town Councils' core strategy for the future.
13. It would destroy the undisturbed habitat of a rich variety of birds and other wildlife. (*Policy C4*)
14. It would almost certainly not be possible to restore the sites to a standard acceptable to the RAF, and in keeping with the District LDF policies and the surrounding AONB, as there is a shortage of inert waste material, a constraint recognised in the OMPSC. (*Policy M6*)
15. It would put an unsustainable burden on local roads and encourage more local traffic to divert through an historic town rather than use the bypass which was created to protect the town. (*Policy C7*)
16. Site access would create an unavoidably dangerous junction onto the narrow busy local road connecting Cholsey and Wallingford. (*Policy C7*)
17. The site would not provide a replacement for Sutton Courtenay, as the quality of the mineral reserve would be inadequate to meet the demand for construction materials in South Oxfordshire, and minerals would have to be imported from elsewhere. (*Policy M3*)
18. The many constraints on the site, some not previously identified, mean that the reserves would be less than anticipated, reducing the economic viability of the site. The site operator may therefore be likely to want to use the plant from their existing site in the Lower Windrush Valley, once the reserves there are exhausted. As those reserves are likely to last for some considerable time beyond 2020, the Cholsey/Wallingford sites would not provide continuity of supply when the Sutton Courtenay reserves become exhausted. (*Policy M3*)
19. The proposed strategy would have the effect of putting at least half, if not 70%, of Oxfordshire's supply in the hands of one operator. This casts some doubt on whether it would be deliverable, or appropriate in terms of market effects.
20. All the other South Oxfordshire sites are closer to Oxford, which would be the probable destination of half the reserve, and none of the sites is materially further from the rest of the market, so there is no benefit in selecting Cholsey/Wallingford as closer to areas of demand for construction materials. (*Policy C7*)
21. A more detailed analysis of the available sites demonstrates that the Cholsey/Wallingford sites actually rank amongst the least favourable.

It would appear that there are no OMPSC *Core Policies* relevant to points 9 & 12 above, two issues which are both particularly significant in this case.

2. Introduction

CAGE (Communities Against Gravel Extraction) has been set up by Cholsey Parish Council and Wallingford Town Council to respond to the Oxfordshire Minerals Planning Strategy Consultation (OMPSC) plans for new sand and gravel extraction in the Parish of Cholsey. The two councils only became aware of these plans in February 2011, from reading Oxfordshire County Council's (OCC) cabinet minutes of 16 February. No prior communication had been received from OCC. CAGE appointed a mineral consultant to advise them on the issues and, following an initial report, decided that there were strong and reasonable grounds to object to the OMPSC plans for this new sand and gravel area/quarry. The town council and six neighbouring parish councils formally support this submission.

CAGE is concerned about the lack of consultation with the main stakeholders directly affected by the OMPSC proposals, including South Oxfordshire District Council, the Wallingford Town Council, Cholsey Parish Council, the Environment Agency and the RAF/MOD. CAGE contacted these five bodies and all confirmed that they had not been consulted by OCC either at the time CAGE was researching this submission or prior to the present consultation.

OCC's 'consultation workshop' in Benson in July 2010 gave the misleading impression that there was little or no likelihood of sand and gravel extraction in the Wallingford/Cholsey area. This view was reinforced by an article following the consultation workshop in the Wallingford Herald on 27th October 2010 which stated that "...the cabinet rejected the option of taking gravel from areas such as Clanfield, Bampton, Stanton Harcourt, Clifton Hampden, The Wittenhams, Benson, Shillingford, Warborough and Cholsey. Instead, the cabinet agreed to focus extraction work on areas already being worked in the Lower Windrush Valley, Eynsham, Cassington, Yarnton, Radley, Sutton Courtenay and Caversham." It is not surprising that in these circumstances Cholsey Parish Council and Wallingford Town Council gave no further thought to the matter and made no further representations to OCC.

CAGE question the transparency, basis and logic of the decision making process. Some of these concerns were highlighted at a meeting with OCC on 12 September 2011 (Appendix II). In particular there appeared to be

- No clear mineral map showing where the economically recoverable sources of sands and gravels are available in Oxfordshire.
- No clear statement as to where the market for these materials will be, what they are to be used for and how the market works. The OMPSC's overriding priority appears to be to reduce 'tonne miles to market', but in a free market this is not within their control, as will be discussed.
- No explanation about the significance and weighting given to all the points in their Appendix 2 table titled 'Site Assessment' which not only appears to have a number of inaccuracies but also ignores important issues such as, in the Cholsey and Wallingford case, the economic and social impact a quarry may have close to two large settlements, encircled by an AONB.
- No consideration is given at this stage of the process to probably one of the most important issues of all, the long term impact extraction would have on sensitive environments, such as the environs of Wallingford and Cholsey, and how the countryside should be best restored and if indeed the objective is actually deliverable within a reasonable timeframe – or ever.

This last point is particularly relevant when the OMPSC plan is not actually identifying a broad area, as it suggests, and as OCC maintained in the meeting of 12 September 2011 (see point 22 of meeting note at Appendix II) but a specific new site for sands and gravels in Cholsey. The fact that a specific site has been chosen is further evident from the Council's background paper: "Development of Draft Minerals Planning Strategy September 2011", which identifies at Section 12 that Stage 10 of the process involved an assessment of the sites nominated by mineral operators and landowners to check that they could potentially deliver the required amount of aggregate. Even the mining operators invited to the Discussion Group

meeting in Oxford on 29th September questioned the logic of a consultation process that puts forward a choice of just one specific new site (SG33 - the other two SG57 and SG60 are too small on their own) and they asked for more openness and flexibility in the site selection process.

There also appears to be a lack of logical progression from the options offered at the workshops in 2010 to the strategy that has now been chosen.

At the 2010 workshops referred to at paragraph 2.30 of the OMPSC a number of options for sand and gravel supply were being presented. Initially (February - April 2010) the options were:

- Option 1: Concentration of sand and gravel extraction in areas in central Oxfordshire;
- Option 2: Dispersal of mineral extraction as widely as possible;
- Option 3: Meeting the requirement up to 2026 from extensions to existing workings, then identifying a new area from Clanfield, Warborough/Benson/Shillingford and Clifton Hampden.

These options were then developed for the July 2010 workshops to:

- Option 1: Concentration on Existing Working Areas;
- Option 2: Concentration on New Working Areas
- Option 3: Dispersed Working

The Cholsey/Wallingford area was identified within Options 2 and 3, but alongside and with working also taking place at a number of other sites.

It is apparent that OCC has not adopted any one of the options discussed at the workshops, but a hybrid of those options, on which there has been no further consultation until now, at this very late stage, in the form of the final version of the draft core minerals strategy.

The CAGE research which has gone into this submission, assembled by necessity in a very short period of time, casts considerable doubt on the correctness of the decision to propose the Wallingford and Cholsey sites as suitable for sand and gravel extraction. The issues raised need to be openly considered and then compared to the alternative sites in South Oxfordshire, if indeed a site is required in the district.

From the information in this submission, it is clear that this small largely undisturbed piece of land has very significant economic, ecological, amenity and historic value, all of which would be seriously damaged by gravel extraction.

We draw attention too to the reasons put forward by Wallingford Town Council in 1987 against the same gravel extraction proposals. These reasons, which were upheld by OCC, are no less valid today than they were then. (Appendix III)

3. Farmland Closely Encircled by AONB

3.1 Character of land between Cholsey & Wallingford

Cholsey village and Winterbrook on the outskirts of Wallingford are separated by just under a mile of arable and grazing farmland, hedges and trees. It is a peaceful and largely undisturbed area, supporting an amazingly wide variety of bird and wildlife, as will be explained in this submission. The farmland is largely Grade 2 agricultural land, and as such should be protected from mineral workings.

The area is close to the Thames, overlooked from Cholsey Hill, around which the river used to meander many years ago, before straightening its course. Unlike any of the alternative areas that were being considered for sand and gravel extraction in South Oxfordshire, this area borders directly on an Area of Outstanding Natural Beauty and is closely surrounded by both the North Wessex Downs AONB and Chilterns AONB.

3.2 The North Wessex Downs and Chilterns AONB

North Wessex Downs AONB has advised CAGE that it has already responded to the OMPSC, advising against the selection of the Cholsey/Wallingford area for gravel extraction. Their comments are as follows –

“All three sites (SG 33, 57 and 60) lie in a narrow gap between the North Wessex Downs AONB to the west and the Chilterns AONB to the east [see map on page 10]. The sites lie within the setting of both AONBs, and although not within the AONBs, run a very high risk of affecting the setting of both.

“The preference of the North Wessex Downs AONB unit is therefore that the Cholsey sites are excluded at this stage of the process on the basis of likely impact on the setting of two nationally protected landscapes.

“Alternatively, that these sites progress no further until detailed landscape and visual impact assessments have been prepared to assess in detail the potential for harm to the setting of both AONBs.

“The North Wessex Downs AONB Position Statement on Setting is attached with these comments.

“Policy C5 should be amended to include the supporting text actually within the Policy.

“Policy C5 should refer specifically to the AONBs, the duty to conserve and enhance AONBs (Section 85 CRoW Act 2000), and refer to the need to consider the potential impact of development outside but within the setting of the AONBs. The scale of development in AONBs (PPS 7) is again referred to in the supporting paragraph but should be brought into the Policy itself.

*“Policy C5 should be more specific in respect of potential harm to AONB setting as the Cholsey sites SG 33, 57 and 60 all lie in a narrow gap between the North Wessex Downs AONB and Chilterns AONB. As stated in respect of the map that illustrates this within the Plan, **the Cholsey sites are requested to be rejected by the North Wessex Downs AONB as they stand, based on likely setting impact on the AONBs.** Alternatively these sites should not proceed any further in terms of consideration until detailed landscape and visual impact assessments have been prepared, as there is a substantial risk from these sites impacting negatively on two nationally protected landscapes.”*

The North Wessex Downs AONB position statement on setting gives very relevant examples of adverse impacts on the setting of the North Wessex Downs AONB:

- *Development which would have a significant visual impact on views in or out of the AONB;*

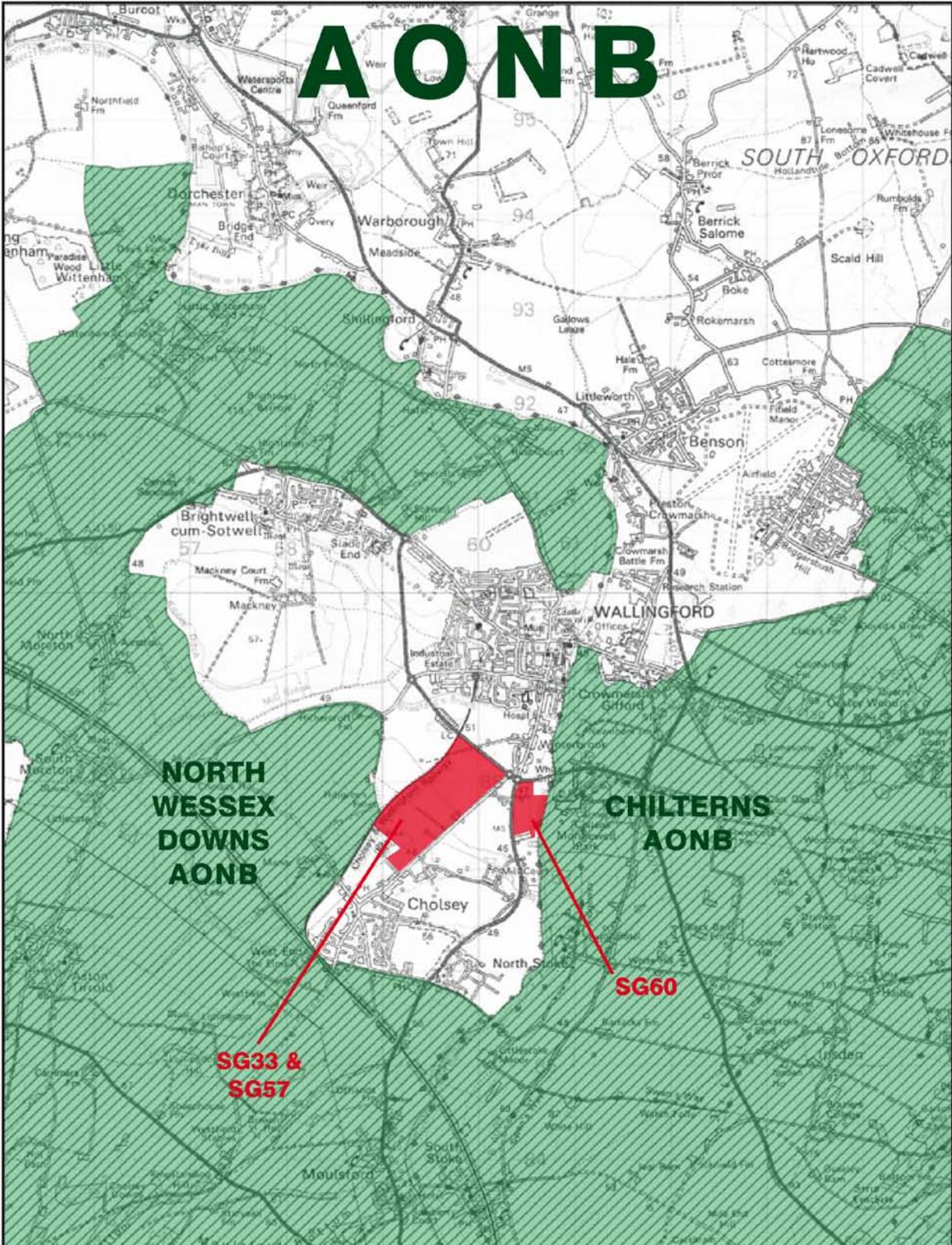
- *Loss of tranquility through the introduction or increase of lighting, noise, or traffic movement or other environmental impact like dust, vibration, spatial associations and historic relationships;*
- *Introduction of abrupt change of landscape character;*
- *Loss of biodiversity, particularly if of habitats or species of importance to the AONB;*
- *Loss of features of historic and natural landscape interest, particularly if these are contiguous with the AONB;*
- *Change of use of land where of a significant enough scale to cause harm to landscape character;*
- *Development individually or cumulatively giving rise to significantly increased traffic flows to and from the AONB, resulting in loss of tranquility and erosion of the character of rural roads and lanes.*

The OMPSC points out in the section on Landscape (5.26) that it is Government policy that major minerals developments should only be permitted in areas not likely to have a negative impact on views and settings associated with an AONB. Annex 2 of the County Council's report to Cabinet of February 2011 (at which it was agreed to pursue the draft Minerals Core Strategy) identifies the planning criteria against which each of the site nominations are to be assessed, and endorses this Government policy. It states at the section headed "Environmental constraints":

"There is a policy presumption against mineral working unless it can be shown that the need for the development outweighs any adverse environmental consequences on:

- **Areas of Outstanding Natural Beauty or their setting;**
- The conservation interest of a Special Area of Conservation, SSSI or National Reserve;
- A Scheduled Ancient Monument or other nationally important archaeologically (*sic*) asset." (bold not in original)

Given the significant importance of AONB designations it is not surprising that it is given prominence as the first in the above list of environmental constraints. The County Council has, however, not followed its own assessment criteria that areas such as Cholsey/Wallingford should only be identified for mineral working in very exceptional circumstances.



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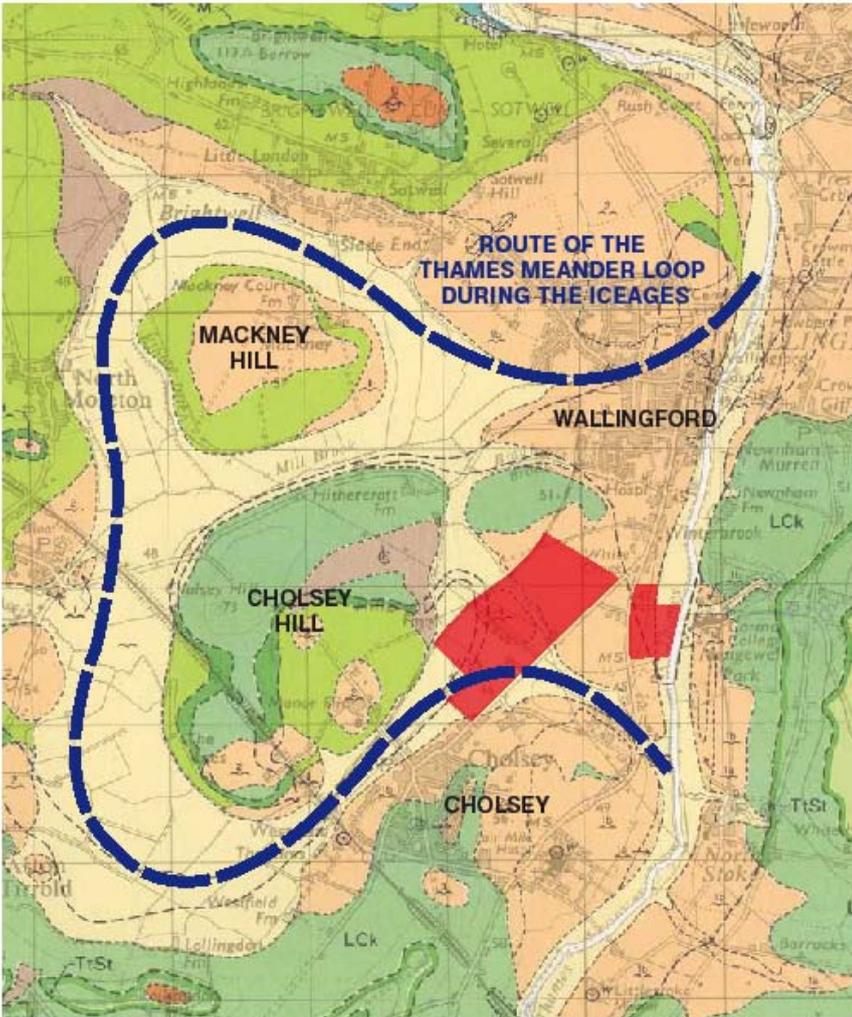
4. Valuable Undisturbed Geological History

4.1 Geomorphology

The proposed sites for gravel working lie to the west of the current course of the River Thames which flows north to south. The Thames has a very long history during which its size and course have varied considerably as the climate has changed. At Sugworth near Abingdon the Thames Gravels are dated to 600,000 years before present and contain fossils of rhino and exotic plants and fruits. 450,000 years ago the Anglian glaciation caused the re-routing of the Thames, while 250,000 years ago there is evidence of the presence of Neanderthals, and at the end of the last glacial advance the Thames Valley was used as a corridor for migration of peoples from Europe.

In the area around Wallingford and Cholsey the Thames valley contains a wide plain formed by the Lower Chalk and Upper Greensand at levels between 42m and 52m above Ordnance Datum. A large former meander enclosed the low rounded hills at Cholsey and Mackney. When the river changed course again and abandoned the meander loop the old channel silted up with sediments brought down from the surrounding Chalk hills by spring fed waters of the Kibble Ditch, the Mill Brook and Cholsey Brook.

THAMES MEANDER LOOP



The Thames Gravels are remnants of deposits which once covered the floors and lower flanks of the main valley and tributary valley. With uplift of the land after the end of the last glaciation and changes in the course of the Thames the river eroded into the sediments leaving disconnected terraces on the valley sides. The river terrace deposits underlie much of Wallingford, Cholsey, Brightwell and South Moreton providing raised and well drained land ideal for settlements. Cholsey Church and Mackney are also located on terrace deposits.

The three proposed extraction sites lie in the former channel and on the river terraces between Cholsey Hill and the current river Thames, and have the potential to destroy valuable evidence about the history of the river valley and the influences of climate change.

4.2 Geology

The solid geology of the area is mainly formed of Lower Chalk comprising a soft grey marly chalk with hard silty seams. The basal 2 to 4m are glauconitic and sandy, and are termed the Glauconitic Marl. These formations overlay the Upper Greensand which is a sequence of banded pale grey to pale green siltstones and sandy limestones (Corser, 1981).

Lower Chalk is present beneath all three proposed excavation sites with Glauconitic Marl being found in the south west corner of site SG33. Site SG57 is underlain by the sequence of Lower Chalk, Glauconitic Marl and Upper Greensand.

The drift geology in the area comprises periglacial deposits, river terrace deposits and alluvium. At least eight levels of river terrace can be traced, but it is the First Terrace that is present on sites SG33 and SG60. Alluvium is present on site SG57 (BGS, 1980).

The First Terrace is a continuous deposit covering some 24.6km², but about half is overlain by alluvium. The deposits around Cholsey are about 2m thicker than those in the present-day valley and comprise sands with pebbles of Jurassic limestone, chalk and flint and minor amounts of ironstone, quartz and quartzite.

The alluvium reaches its greatest extent along the former course of the River Thames to the west of Cholsey with a maximum thickness of 3.4m. It consists of dark grey calcareous loams, silts and clays with sporadic lenses of sand and fine gravel and seams of peat and molluscan shells.

4.3 Mineral Information

In Mineral Assessment Report 64 (Corser, 1981) a borehole (SU 68 NW 9) was drilled immediately to the west of the southern end of site SG60 on the opposite side of the Reading Road. Beneath a topsoil cover of 0.2m the First Terrace River Deposits comprised 1.0m of sandy clay over 2.6m of clayey pebbly sand. Lower Chalk was encountered at 4.8m depth. The particle size distribution was dominated by sand with a mean gravel content of 16% and the composition of the gravel was predominantly chalk and limestone (66-70%).

In site SG33 a mineral assessment borehole (SU 58 NE 14) was located in the south west corner, and another borehole (SU 58 NE 13) was located immediately to the west of the railway line in the northwest corner. Borehole SU 58 NE 13 comprised 0.1m of soil over 0.6m of very silty clay over 5.1m of clayey sandy gravel. Sand (61%) was the dominant particle size with 23% gravel. The mean limestone and chalk content of the gravel was 65%.

Borehole SU 58 NE14 was drilled to a depth of 5.7m. The sequence comprised 0.2m of soil over 0.9m of sandy clay over 4.3m of clayey gravel. The particle size distribution was split between 41% sand and 40% gravel with 19% fines. The average composition of the gravel component was 52% limestone, 18% chalk, with flint, quart, quartzite, ironstone and some minor constituents comprising the remaining 30%.

No mineral assessment boreholes were present on site SG57. However, two nearby borehole records are available on the GeolIndex for the UK at www.bgs.ac.uk. Borehole SU 58

NE 88 and SU58 NE 89 indicate that beneath a topsoil and less than 1m of clay there is a horizon described as 'ballast' with chalk and clay of approximately up to 3m.

4.4 Assessment of Mineral Potential

The mineral deposits are essentially sands with gravels of a high carbonate content. Such aggregates are not of the best quality and their usefulness may therefore be limited without further augmentation and processing.

4.5 Hydrogeology

The Lower Chalk beneath the area is a Principal Aquifer which means the rocks usually provide a high level of water storage. They may support water supply and/or river baseflow on a strategic scale. The First River Terrace deposits and the Alluvium around Cholsey are classed as a Secondary A aquifer with permeable layers capable of supporting water supplies at a local scale, and potentially forming an important source of baseflow to brooks and the river. Both aquifers have a high permeability and are highly vulnerable to pollution of the groundwater. www.environment-agency.gov.uk

Groundwater levels as indicated in the Minerals Assessment Report (Corser, 1981) lay at the time of measurement between 1m and 3.2m below ground level. However, depending on the extent of hydraulic continuity with the River Thames, groundwater levels are likely to be influenced by the seasons and water levels in the river itself. The hydrogeological map of the area (IGS, 1978) does not define the direction of groundwater flows in the area.

No groundwater protection zones are indicated in the Cholsey and Wallingford area close to the proposed extraction areas, www.environment-agency.gov.uk. The significance of the local aquifers to local supplies will require a search of local authority private water supply records and the Environment Agency's register of permitted abstractions.

4.6 Impact on Groundwater

The detail of the groundwater regime in the vicinity of the extraction sites is not well known. Investigations are required to establish the impact of the sites on the groundwater quality and flows in the context of the abandoned Cholsey meander loop and its connectivity and storage potential with the current River Thames channel.

Consideration should also be given to the proximity of Cholsey Sewage Works and its potential to be a source (like many other sewage works) of groundwater contamination from contaminants such as ammonium salts. This sewage works was the source of a major sewage Pollution Incident on 8th September 2003, www.environment-agency.gov.uk.

Any dewatering operations need to consider the impact on:

- sensitive ecological areas;
- dehydration of peat deposits in the Cholsey meander loop and the release of carbon dioxide; and
- ground stability.

4.7 Hydrology

The watercourses around Cholsey Hill, and the River Thames are designated as main river. Site SG60 abuts the River Thames and is almost entirely subject to river flooding. Site SG57 is extensively subject to flooding from rivers, and the southern part of site SG33 is prone to extreme flooding events, www.environment-agency.gov.uk.

The water quality of the Mill Brook is not identified by the Environment Agency. Water quality in the Cholsey Brook has a B rating for chemistry and biology, but has a high nitrates and phosphates content.

The River Basin Management Classification www.environment-agency.gov.uk for the local main rivers is assessed as follows:

	River Thames	Cholsey Brook	Mill Brook
<i>Ecological Quality</i>	Moderate	Poor	Good
<i>Chemical Quality</i>	Good	Good	Not assessed

Mitigation of the impact of any planned extraction operations will be required on the flooding potential, chemical quality and ecological quality of these sensitive surface waters. Such development is likely to have a negative influence on sustained improvement in flood management and quality objectives.

References

British Geological Survey, 1980. *Henley-on-Thames Sheet 254*. Solid and drift Edition 1:50,000 series.

Corser C E , 1981. *The sand and gravel resources of the country between Wallingford and Goring, Oxfordshire*. Mineral Assessment Report 64. Institute of Geological Sciences, Natural Environment Research Council.

Institute of Geological Sciences, 1978. *Hydrogeological Map of the South West and the Berkshire and Marlborough Downs*. Scale 1:100,000.

5. Historic Environment

5.1. The Historic Background

Wallingford and Cholsey lie in a rich archaeological and historical environment. Their boundaries were established over a thousand years ago and their hinterlands have revealed a continuity of settlement dating back at least three thousand years.

Wallingford is the largest and most complete surviving example of a Saxon fortified town in England; its still impressive earthen defences and town ditch (in places eight metres deep beneath the height of the surviving rampart) date from the time of King Alfred (871-899). Cholsey was acquired by the king in the same period, part of the build-up of royal lands as a defensive hinterland to Wallingford and was an important royal holding until it was gifted to the new Reading Abbey in 1121 by Henry I. Both places are listed in Domesday Book (1086) by which time Wallingford was the leading town of Berkshire, with a royal castle that played a major role in the dominance of the Thames Valley throughout the medieval period and was visited or inhabited by numerous medieval kings, queens and princes.

The town received its royal charter in 1155, one of the earliest granted, and thrived until the late 13th century when, for complex economic reasons, its fortunes waned. Unlike neighbouring towns such as Reading, Oxford and Abingdon, Wallingford did not grow hugely, so preserving the essence of the late Saxon and early medieval town. This historical accident has made it a unique survival.

The historic and archaeological potential of Wallingford secured a substantial Arts and Humanities Research Council (AHRC) grant from 2008-2010 for a team from the Universities of Leicester, Exeter and Oxford. With the help of The Wallingford Historical and Archaeological Society (TWHAS) and Wallingford Museum and the encouragement of local councils, it has undertaken geophysics, excavations, test-pitting and topographic surveys of the town and its suburbs with a view to expanding understanding of Wallingford and medieval urbanism.

This combined university and community *Wallingford Burh to Borough Project* has highlighted the importance both of the town and its hinterland as a whole. Interim results, several articles and a British Archaeological Report have so far been published, with two further publications in preparation for 2012. The research work is continuing, as is the test-pitting, and further archaeology is planned.

The *Burh to Borough* project has raised the awareness of the town nationally, and locally has reinforced the already highlighted potential of tourism as a key role in the town's economic future. Numbers of tourists are already increasing, visitor numbers to Wallingford Museum have substantially risen in 2011 and various new town trails – including the Dame Agatha Christie trail to Cholsey – are proving popular.

The proposed gravel extraction in Cholsey lies within the historic southern hinterland of Wallingford and would not only mutilate the preserved setting of the historic town and ancient village but also totally destroy its landscape archaeology.

5.2. The Archaeological Environment

The building of the bypass in 1992 and subsequent study of the southern hinterland of Wallingford have highlighted the importance of ancient boundaries and the continuity of settlement on the fertile Thames Valley gravel areas. There have been numerous archaeological finds and features identified in close proximity to the proposed gravel extraction site and signs of other as yet unidentified features have been noted on air photographs and recently acquired LIDAR images. What follows is a brief chronological summary [references are to sources S1 etc below]:

Pre-historic

The stretch of the Thames Valley around Wallingford has produced various scatters of flint tools, including Mesolithic axe heads from a garden in Ilges Lane, Cholsey. Also, an ancient buried river channel was located in borings for an extension to the Cholsey Sewage works. [S2p10] This area, and much of the rest of the proposed gravel extraction site, has been highlighted as an Area of Archaeological Restraint on maps prepared by county archaeologists for the planning authority [see page 19].

Neolithic monuments are prolific to the north and east of Wallingford and Cholsey, notably in Dorchester and Benson. A bank barrow was located at North Stoke, on the opposite side of the river from Cholsey and at nearby South Stoke, clusters of Neolithic pits were found [S1Booth,p5]. Within Wallingford itself Neolithic Peterborough ware was found near Wallingford School [S1Booth,p5]. To the south west of the town, a Neolithic double ring ditch was identified just north of Bradford's Brook [S1Booth,p6].

During evaluation excavations for a potential development at Winterbrook in 2009, Wessex Archaeology located a single flake of worked flint, (likely Neolithic), two sub-circular 'ring-ditch' features and two east-west aligned ditches of likely pre-historic date. [S6] Close by, south of Bradford's Brook, but north of the bypass, features of a possible henge or causeway enclosure have also been noted. Although these do not lie within the defined gravel extraction area, they, like the other features mentioned, are in close proximity to it and may relate to other features identified within the threatened area (see below).

Bronze Age

There is considerable evidence of Bronze Age activity close to the threatened areas. A middle Bronze Age waterhole was excavated when the bypass was built in 1992 and elements of a field system in the Bradford's Brook area appear to be late Bronze Age. [S3 pp203, 223] A possible Middle/Late Bronze Age ditch was also noted south of Bradford's Brook by Wessex Archaeology [S6] The discovery of a nationally significant high status Bronze Age island in occupation from c900-700BC, lying close to the site of the new Winterbrook Bridge, gave a context to numerous other discoveries of Bronze Age artefacts from the river in the Cholsey area [S3]. Many of these are held in the Thames Collection at Reading Museum, but a few fine specimens are on display in Wallingford Museum. Gravel extraction close to the river and inland from it might be expected to produce other features from this period.

Iron Age

The discovery of a Middle Iron Age settlement in Winterbrook alongside Bradford's Brook [S6] testifies to the early importance of this water source which eventually became established as the boundary between Cholsey and Wallingford (see below). Another major feature of the period is the impressive Grim's Ditch, which lies on the opposite side of the river. The significance of this massive bank and ditch is not yet fully understood but it is widely considered to have marked an important Iron Age tribal boundary. This part of the Thames Valley (which includes the threatened site) is noted as an area where three tribal groupings converge: the Catevellauni, Dobunni and Atrebates. It is therefore of particular archaeological interest. [S4 p3-6; S5, p365-9]

Roman

Cholsey lies on the route of a known Roman route from Silchester to Dorchester and beyond. Another likely Roman route crossed the Thames close to Wallingford Bridge in a SE/NW direction [S1 Booth p8 & Edgeworth p82-3]. Roman evidence is scarce in Wallingford and the settlement, if any, has yet to be located. Recent LIDAR photographs of the area designated for extraction have revealed evidence of a field system with defined boundary features which could be of Roman origin (personal observation by Richard Oram, County Planning Archaeologist). Their existence is clear and needs investigation. The proposed gravel extraction would destroy them.

Saxon and Medieval

The importance of Cholsey in the Saxon period has been highlighted in the context of the Historic Environment. Bradford's Brook formed its northern boundary with Wallingford by the ninth century [S1 Dewey,p18 and S2 p17,& p236n9]. Cholsey church was founded around 986 and late Saxon work survives in the tower. Domesday Book records large numbers of *cottars* in Cholsey in 1086 which may suggest that the village had many early outlying settlements. This is reinforced by a wealth of later documentary and map evidence from the medieval period to the 19th century [S2p45-58]. Hill Green and Cox's Farm are two such areas affected by the proximity of designated extraction area. LIDAR images of Cox's Farm reveal features of earlier occupation which deserve investigation and may relate to other indications within the threatened site.

Conclusion

The sites proposed for gravel extraction lie in close proximity to an area which has proved rich in archaeological finds and are divided from it only by a modern bypass which created a false barrier across a landscape that has been integrated for thousands of years. Much of the proposed extraction site has already quite rightly been highlighted as an area of archaeological sensitivity [see map on page 19]. Recent developments in archaeology, particularly the work of the *Wallingford Burh to Borough* project, have reinforced the importance of considering the hinterland of towns and villages. In this case there is a strong continuity of occupation to the south of Wallingford which is not yet fully understood or investigated. The gravel extraction would obliterate a large tract of this important landscape and destroy both the historic and archaeological environs between Wallingford and Cholsey.

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5.3 Listed Buildings

There are two listed buildings affected by the OMPSC proposals:

New Barn Farm

This farm within the SG33 site contains a very fine Grade II listed mid 18th century timber-framed aisled barn PRN 20770. It is substantially intact but semi-derelict with some temporary supports, abandoned and open to intrusion. This building appears to be generally 'at risk' and is clearly put at greater risk of demolition from any advance of the gravel site proposition.

It would be invidious in any way to condone the destruction of a building included on the List of Buildings of Special Historic or Architectural Interest without a full evaluation of the possible consequences. No evidence has been produced that new uses have been sought for this building or any scheme explored that might restore its general beneficial value.

Cox's Farm

This building is a Grade II listed building PRN 10943. It is a 17th century farmhouse, now house, with 20th century alterations. It is surrounded by large earthworks which appear to be partly from other buildings and partly from an extensive garden including ponds and water channels, now mainly dry but giving the house and garden to the west a partially moated appearance. The understanding of its history and development would clearly benefit from further investigation.

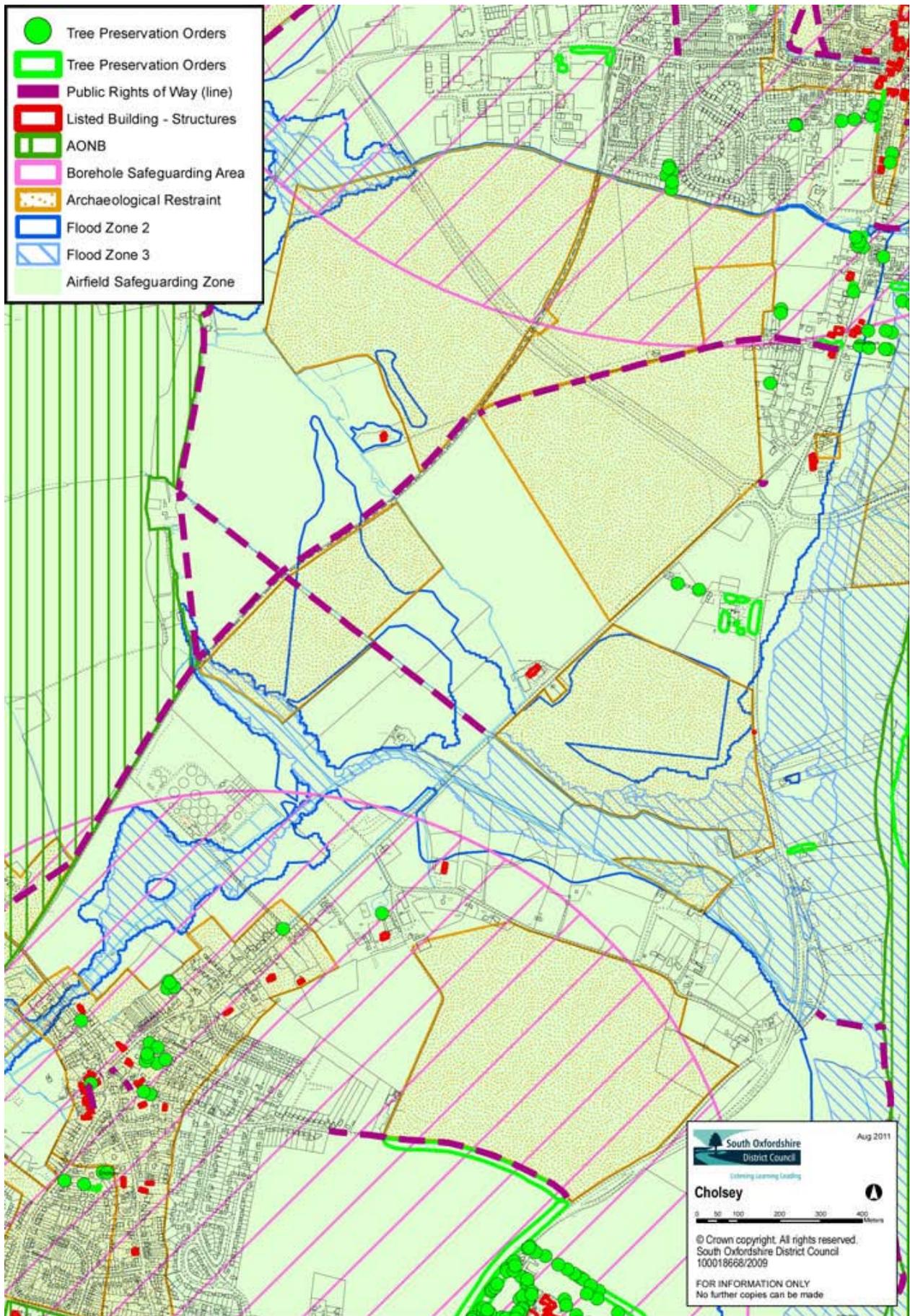
The likely impact of gravel extraction as proposed is that this fine building and its historic setting would be rendered less usable, less capable of being 'enjoyed' and similarly its financial value would be likely to be considerably reduced for many years, to the detriment of its interest and viability.

Access to Cox's Farm is through the quarry site.

There is a duty on local planning authorities within the Planning (Listed Buildings and Conservation Areas) Act 1990 in considering development which affects a listed building or its setting to have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses. The setting is often an essential part of the building's character, and the economic viability as well as the character of historic buildings may suffer and can be robbed of much of their interest, and of the contribution they make to townscape or the countryside, if they become isolated from their surroundings by new development.

The existing farmland is very much part of the setting to the two affected listed buildings: both a farm house and a barn, and for Cox's Farm the setting would include its access. The introduction of industrial gravel pits would clearly significantly harm this setting.

It is furthermore apparent that an assessment of the impact on both the historic and architectural value of the listed buildings directly affected by the proposed working at Cholsey/Wallingford has not been carried out by the County Council in accordance with its statutory obligation.



6. Effect on Important Recreational & Amenity Use

6.1 The River Thames

Proposed site SG60 lies directly alongside the River Thames in one of the river's most rural and undisturbed stretches. The impact of the gravel workings would be abruptly to change the landscape character of the river bank and to disturb the tranquility of the totally rural scene. This is the longest reach on the Thames between locks and has been chosen by Oxford University and Oxford Brookes University to train their rowers. It is also recognised as an important corridor for wildlife.

The SODC Core Strategy 2010 states *"Policy CSEN 1 - The district's distinct landscape character and key features will be protected against inappropriate development and where possible enhanced... 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 recreational use."*

The Environment Agency is also actively seeking to increase the recreational use by boaters of the river which is an amenity of national importance. To disturb this stretch would be contrary to both policies.

6.2 Rights of Way

The important and much used Thames Path runs through the length of the proposed site SG60. This is part of a heavily promoted national trail attracting hundreds of walkers to the vicinity each year. This section of the route is particularly noted for its undisturbed rural character.

In addition, well-used rights of way surround and cross the sites SG33 & SG57. These footpaths provide direct routes between Cholsey Church and both Winterbrook and Wallingford, and between Hithercroft and the Wallingford Road. They also form essential parts of several walks featured in the recently revised publication *Parish Potters around Cholsey*, Pie Powder Press 2011.

6.3 Cholsey & Wallingford Railway

This heritage and tourist railway, which was set up thirty years ago and relies on tourism for almost all its funds, runs for much of its length alongside the proposed gravel pit, on land owned by the Wallingford Town Council. The Railway has advised CAGE that they fear that the proposed gravel pit would threaten their ability to continue operating both by destroying its reputation as an attraction and by causing instability to the railway. They wrote to CAGE on 7 September 2011 making the following points:

"Currently our Railway runs through an extremely attractive rural farming area and while planners say that no-one is entitled to a view, it has to be part of what is making us a successful and growing part of the Thames Valley's tourism. With the gravel pit running for one third of the length of our Railway its impact will be enormous and people will just not come to see an industrial hole in the ground. Part of the extraction submission to OCC mentions that there would be an earth bank constructed alongside the Railway. This would give the effect of the Railway running through a continuous cutting on one side and is not offered as a form of protection for the Railway. It is to give the extraction company somewhere to dump the topsoil that they cannot sell.

"The operation of a gravel extraction plant is going to downgrade our area and make it unattractive to visitors. The Cholsey & Wallingford Railway through its members and supporters have worked very hard and given a great deal of voluntary time since 1981 to save, stabilise and grow this railway so that it is becoming a significant part of Thames Valley Tourism. We are on the threshold of a number of initiatives that will add considerably to the Railway's attraction for visitors from a considerable distance as well as the local population. Heritage Railways are

fast becoming a valuable part of the local economy in many parts of the country and we could show many examples of their success.

“All of this effort and potential is under severe threat from this extraction plan and we have very strong reasons to object to the proposal. We do not want to see the Cholsey and Wallingford Railway being forced to close.”

The Railway also voiced concern about the effect gravel extraction would have on the stability and potential subsidence to their tracks caused by artificially lowering the water table. This concern may be well justified as Smith & Sons (Bletchington) Ltd state in their SG33 and SG57 Site Nomination Forms (November 2008) that *“The gravels lie below the water table and would be dewatered and worked dry”*.

6.4 Dame Agatha Christie Trail

Agatha Christie died at her home in Winterbrook in 1976 and is buried in St Mary's churchyard in Cholsey. Her connection with the town and parish attracts people from all over the world. The Dame Agatha Christie Trail [see page 22], part financed by South Oxfordshire District Council and South East England Development Agency, is a circular route from her house to the churchyard on field paths alongside the heritage railway line and then back along the Wallingford Road footpath.

Most of the route is alongside the boundaries of the proposed extraction site, which it effectively encircles and part crosses, and these plans would inevitably destroy this important local attraction.

6.5 Oxfordshire County Council Sponsored Cycle path

The Wallingford Road is a regular route for many commuters travelling daily to Oxford, Reading and London from Cholsey station, and others going the other way to school, work or shopping trips in Wallingford. It is used not just by motorists, but also by cyclists and walkers.

Because of the increase in population, the desire to encourage more sustainable transport, the dangerous nature of Wallingford Road for cyclists and the need of people to access Cholsey Station, OCC approved a cycle route along the Wallingford Road and within the proposed gravel extraction sites SG33 and SG57. This cycle route would run on the quarry site side of the hedge.

A third of the funding is in place and it is anticipated that the balance will be forthcoming within the next five to ten years from Section 106 contributions for infrastructure improvements from developers of new housing in the area. This cycle route should be operational before commencement of any gravel extraction and in consequence would present a difficulty for any site access to be located along the Wallingford Road, and any access along that road would be a major hazard to cyclists. Needless to say, a gravel quarry would inevitably discourage many cyclists and walkers from using the path.

PERSONAL DETAILS ABOUT DAME AGATHA CHRISTIE

DAME Agatha Christie DBE CBE was born Agatha Mary Clarissa Miller on 15 September 1890 in Torquay, Devon. She was the daughter of Clarissa Boehmer and Frederick Miller, an American stockbroker. Agatha was the youngest of three. Her siblings were Margaret Frary Miller, called Madge who was eleven years her senior and Louis Montant Miller called Monty who was ten years her senior.

During the First World War she worked as a nurse in a hospital which she thoroughly enjoyed. She later worked in a hospital pharmacy which gave her a working knowledge of poisons.

Despite a turbulent courtship Agatha married Archibald Christie, an aviator in the Royal Flying Corps, on Christmas Eve 1914. The couple had one daughter, Rosalind. In late 1926 Archibald said that he was in love with another woman and he wanted a divorce. In December of that year, after a quarrel, Agatha 'disappeared' for 11 days. The story made headline news in the papers. Eventually she was discovered in a hotel in Harrogate registered under the name of Mrs Teresa Neele. Agatha and Archibald were divorced in 1928.

In 1930 Agatha married archaeologist Max Mallowan. The marriage was especially happy and remained so until her death. She joined him on archaeological digs in the Middle East which formed the background for several of her novels.

Agatha Christie is the best selling writer of books of all time. Only the Bible has sold more than the four billion copies of her novels. She was made Dame Commander of the Order of the British Empire in 1971 three years after her husband had been knighted for his archaeological work.

Dame Agatha Christie died at her Winterbrook house on 12 January 1976 and is buried in the churchyard of St Mary's, Cholsey.

Begin your walk in the Market Place

1 With your back to the Town Information Centre look right where you will see the Corn Exchange which was built in 1856. Its original purpose is denoted by the carved decoration over the lintel. It is now the home of the Simodun Players an amateur theatrical group. Dame Agatha was their president from 1951- 1976.

You may wish to have refreshment here. After leaving the Corn Exchange turn left down St Mary's Street. You will see the old Alms Houses on your left which were built in 1681. On the right is St John's Green where the road becomes the Reading Road. You will then pass the Wallingford Community Hospital on your right and cross over Bradford's Brook.

www.wallingford.co.uk

2 Not very far from the brook is Winterbrook House to your left where Agatha Christie and Max Mallowan lived from 1934-1976. There is now a blue plaque on the house. The house is not easy to see as there is a large hedge round it. Agatha used to say that 'it was very close to the main road.'



3 Almost opposite on your right is Winterbrook Lane. Go down it. The lane eventually becomes a gravel path. Continue on until you shortly arrive at the Wallingford bypass. Cross the road carefully to the gravel path opposite. Go down the path until you reach-

4 The railway line known as the 'Bunk'. Cross the line very carefully after checking both ways for trains. Trains do not regularly run nowadays but the line can be busy at certain times of the year particularly at holiday times. Having crossed to the other side of the line go through the white gates and turn immediately to your left and follow the waymarked path which is running parallel to the railway line. After a mile or so and several stiles later you will come a place where the path appears to be curving to the right and taking you towards a copse of



trees. Ignore this as you can continue on the path towards a new stile albeit the path is very narrow. Having climbed the stile head in a diagonal direction across the field. You will eventually come to a stile which will bring you onto a road. Cross the road carefully and go down the gravel path to-

5 St Mary's Church, Cholsey. If the church is locked then do take some time to look round the outside. Go to the back of the church where you will see next to a wall on your left -

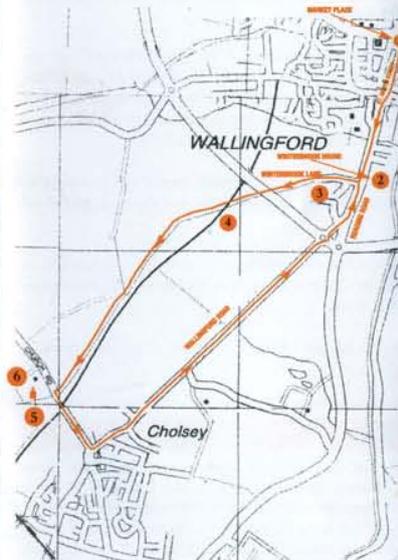


6 The grave of Dame Agatha Christie under her married name of Mallowan. You can't miss it as it is one of the most impressive graves in the churchyard.

To return to Wallingford you have a choice - return to the road and either go back the way you came or turn right and follow the road into Cholsey. At the first mini roundabout turn left (it is signposted to Wallingford). You will go past the Red Lion public house where you can take refreshment.



Continue down the road until you come to a roundabout on the Wallingford bypass. Turn right where almost immediately you will come across another roundabout. Follow the sign to Wallingford. You will soon find familiar landmarks you have previously seen.



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Dame Agatha Christie Trail



7. Effect on Local Economy & Tourism

7.1 Proximity to 10,000 Population

Wallingford is closely surrounded by a number of individual, distinct settlements such as Cholsey, Crowmarsh and Brightwell-cum-Sotwell. Any gravel extraction workings in this area and close to the town of Wallingford are inevitably going to be very close to significant centres of population. Furthermore the prevailing wind is from the southwest and this will bring dust and noise pollution into the very heart of the town. There is a hospital, health centre and housing directly upwind of the site.

The choice of the proposed sites SG33, SG57 and SG60 takes no account of the impact on significant nearby populations. These sites are within a mile of some 10,000 people living in Wallingford and Cholsey, a number that is set to increase by a few thousand during the next decade. Furthermore, 160 new houses are planned at Mongewell Park directly across the river from site SG60. It would seem reasonable to expect that gravel extraction sites, CDE facilities and concrete batching plants, all of which may be located together, should be sited in places which minimise the adverse impact on significant centres of population.

With the pressure for housing, the town and parish councils are working hard to try and preserve the distinctiveness and identities of the surrounding settlements and the separating landscape plays an important part, which would be harmed by these proposed gravel extraction sites.

The Wallingford by-pass was constructed to take traffic away from the centre of the town to overcome the severe problems of narrow roads, fragile historic buildings and sub standard air quality. It is a concern that the significant number of lorry movements anticipated in and out of the sites and along the bypass will deter motorists from using the by-pass and encourage them to again go through the town. This would be contrary to the original objective and damaging to the town.

7.2 Local Economy & Tourism

In the past small market towns such as Wallingford have been self-contained and commercial centres for the surrounding area. The economies of these towns were very much dependent upon, and supported by, the retailers, markets, public houses, cafés and supporting services and the businesses that provided local employment.

In more recent times this has changed. In the retail sector there is now competition from larger nearby towns such as Didcot, Reading and Oxford all easily accessed by public transport or car. Didcot, being only five miles away and designated as an expansion town, poses a very significant challenge not only to retailers but also for leisure activities and work. Due to the decision to expand Didcot, significant public and private sector funding is focused there to the detriment of Wallingford.

The Town Council and District Council have for some years now recognised the changing circumstances and the fact Wallingford has to change to remain a vibrant and prosperous town. Both Town and District Councils share the same vision for the future. This vision in general terms sees:

- the promotion of the town through its nationally recognised historical importance as one of the country's best preserved Saxon towns together with its place at the heart of subsequent English history and with its riverside setting in beautiful countryside
- the expansion of cycle ways, historic walks and the like
- the need and opportunity for small independent specialist retailers who would be complementary to the retail offer in the large towns
- the promotion of good restaurants and use of local food
- the promotion and expansion of local markets

- improvements to make the town centre more attractive and visitor friendly

These principles are set out in a number of documents but all with a similar thrust.

In a report prepared by **The Civic Trust** they note *“There are strong assets on which to build: a unique history and heritage, a range of specialist shops, a superb location on the banks of the River Thames. This confirms that Wallingford is a unique town in a superb setting.”*

The **District Council’s Core Strategy**, currently being subjected to review by a Government Inspector, also states *“Wallingford’s strengths include its location by the River Thames and proximity to the Chilterns and North Wessex Downs AONBs”*. The Core Strategy also recognises that Wallingford is now *“hosting events which draw people to the town including markets, festivals and rowing events”*.

The Core Strategy goes on to identify that the strategy for Wallingford is:-

- to support measures that improve the attraction of Wallingford for visitors
- to improve local air quality
- to support schemes that enhance the town’s environment

The **South Oxfordshire Market Towns Action Plan 2010-11**, which draws on the Civic Trust and other reports and is referred to in the Core Strategy, includes the following actions in respect of Wallingford:-

- to increase awareness as a destination
- to support the development of activity packages to stay longer and spend more
- to increase awareness of cycling opportunities
- to increase visibility of Wallingford’s historical assets (improve physical links between historic sites)
- to develop themed trails such as historic tours and Agatha Christie.
- to support the delivery of a cycle path between Cholsey station and Wallingford

These reports, based on expert consultation, emphasise the need to promote the assets of the town and surrounding area in terms of its history, landscape setting and countryside activities in order to maintain a vibrant and sustainable economy. The future of Wallingford is going to be increasingly dependent upon tourism. This must be developed to compensate for losing retail business to the larger towns and other jobs to Milton Park and Science Vale, now part of an Enterprise Zone. To further stress the importance and significance of tourism in South Oxfordshire it is noted that The Tourism South East Research Unit produced a report in 2009 entitled the *‘Economic Impact of Tourism, South Oxfordshire’*. This indicated that tourism was worth about £222 million per annum and that 5,000 jobs (9.5% of all employee jobs) were in tourism-related sectors, particularly important to the three towns of Wallingford, Thame and Henley.

The river and surrounding countryside are key elements to the successful implementation of this strategy. Extensive gravel extraction workings within the Parish of Cholsey and close up to the town of Wallingford, specifically impacting on visitor attractions, would harm this strategy, so essential for the future economies of Wallingford and Cholsey.

8. Ecology & Wildlife

SG33 & SG57 are farmland sites consisting largely of permanent grassland grazed by beef cattle or sheep, except for the northern end, which is arable and is currently a large ploughed field. There are hedges and trees around much of the proposed sites. Those bordering Green Lane are of particular interest, being well established and supporting a wide range of bird species throughout the year. Much of the hedging is mature hawthorn and to the north east of Green Lane there are also broken lines of mature hedging that are probably of greater value to wildlife than as field dividers. The Cholsey & Wallingford Railway line (known locally as The Bunk) has various mature trees alongside including oaks and ash and both the Wallingford Road and Wallingford by-pass boundaries to the site are marked by continuous mixed hedging and a few oak trees beside Wallingford Road.

Many of the existing hedge lines are old field margins and remaining evidence of former field systems. Some of the fields to the south west of Green Lane are of historical interest since they were former playgrounds where the village football and rugby teams competed. The stand of willows is an interesting remnant of a withy bed when Cholsey was an important centre for basket making.

Most of its environmental value lies in the lack of disturbance. This may explain why it is an area where it is easy to see creatures that require space away from humans. Foxes (not to be confused with urban foxes), roe deer and hares are often seen here. Hithercroft Brook, alongside Green Lane, is where weasels and stoats are seen, and beside which there have been sightings of otters in recent years. (The otter is coming back to our region.) Such mustelids are generally difficult to see, and have most commonly been spotted emerging from the proposed site before crossing the Wallingford Road. Reports of these sightings may be found in Cholsey's *'The Forty'* magazine articles and the Reading & District Natural History Society annual publications of *'The Reading Naturalist'*.

Buzzards, tawny owls and red kites nest here and the fields are much used by flocks of birds in winter especially. These birds include lapwing; golden plover; fieldfare; redwing and roosting grey herons. Mainly in winter kingfishers, snipe and woodcock can be flushed from Hithercroft Brook, whilst that part of Cholsey Brook visible from Wallingford Road hosts moorhen and, in winter, teal with the occasional widgeon.

Lapwings have also nested for the last couple of years in a field next to the Bunk line. Other birds of interest regularly seen from the surrounding footpaths are corn bunting, reed bunting, yellowhammer, linnets, skylark, meadow pipit, song thrush, mistle thrush and green & great spotted woodpeckers. Present in the area are kestrels, little owls, barn owls, and occasionally in winter - short-eared owls. In recent years barn owls have been mainly concentrated around Cox's Farm. The track to Cox's Farm and The Bunk railway line have proved to be regular stopping places for wheatears on migration. Breeding birds include whitethroat, lesser whitethroat, sedge warbler, blackcap, bullfinch – all have been seen or heard in recent months. A pair of hobbys have frequented the area for years, but their nest site is not known which is not surprising since they are incredibly secretive. 2011 has been notable for the presence of yellow wagtails throughout the summer – this is a seriously declining migrant species, so the presence of about 20 on the proposed site recently is of special interest. Cholsey is privileged to still have breeding populations of swifts; house martins and swallows and all of these are seen hunting for insects over the fields.

The area is not one to have been subjected to intensive study in the past, so the short notice provided of the proposal has not allowed more than a brief assessment to be made based largely on recent observations by local naturalists. Without the opportunity to study the area through all the seasons, a full assessment is impossible. To illustrate this point, a single brief evening visit was made this September to the junction of Wallingford Road and Green Lane in search of bats. Within five minutes both serotine and pipistrelle bats were detected flying over the proposed site. Also this September the large noctule bat has been observed

feeding over some of the outlying bungalows beside the Wallingford Road. In 2010 noctules were regularly seen flying over the field between the Sewage Works and the Wallingford Road, sufficient to suggest a nearby roost. This spectacle was also reported in an edition of *The Forty* magazine at the time.

No analysis of the freshwater brooks and their wildlife has been undertaken - Cholsey Brook flows mainly through private land and Hithercroft Brook is much overgrown so both present access problems. Both brooks meet up before reaching Mill Court and the Thames. The flow of Cholsey Brook in particular is used by adjoining landowners for their livestock, or in the case of Mill Court for its amenity value. The examples given of birdlife attracted to the brooks suggests a reasonably rich aquatic food source.

None of the above observations refer to the other Cholsey site SG60 beside the Thames at Whitecross. There has been insufficient time to make detailed comments about this area's ecology, although it should be pointed out that it forms part of a long stretch of undisturbed riverbank that runs all the way from Wallingford to Moulsoford. It is also worth mentioning that much of this area is flooded regularly and may be described as a water meadow with associated wetland plants and wildlife.

Smith & Sons (Bletchington) Ltd suggest in their Site Nomination Form (November 2008) for SG33 and SG57 that there were "*opportunities to increase biodiversity from current intensive arable farming...*" This is an erroneous and misleading statement. The area in question is not intensively farmed and the inevitable result of gravel extraction would be to damage an area already rich in biodiversity, not enhance it.

9. Site Restoration

9.1 Implications for RAF Benson

We have been informed by the Defence Infrastructure Organisation, (DIO), Kingston Road, Sutton Coldfield, that they do not have any record of the proposed gravel extraction site at Cholsey. They say that they therefore assume the proposal is still at a relatively early stage and the DIO will formally comment once the full planning application is in process as they should be consulted under the Town and Country Planning Circular 01/03 (Safeguarded Aerodromes Technical Sites and Military Explosive Storage Areas).

With the Minerals Planning Strategy Consultation Draft – September 2011 being subject to consultation with a closing date of the 31st October 2011 it would seem a major omission if the MOD has not been included as a consultee. It would not seem a sound process if the DIO has not been consulted at the earliest possible stage.

We have been informed via RAF Benson that the main concern of the DIO would be in relation to the creation of large areas of standing open water which can be attractive to large bird species increasing the risk of a hazardous bird strike incident.

We note that there is a significant amount of training and test flying of helicopters and fixed wing trainer planes in the vicinity of RAF Benson. The instruction to pilots is to avoid as much as possible the overflying of built-up areas which results in a considerable amount of air traffic over the proposed gravel extraction site between Wallingford and Cholsey.

This issue was one considered in detail by the Oxfordshire County Council Minerals Working Party as noted in the report dated the 30th March 1987. At that time it was noted that large areas of open water in this area would not be acceptable to the MOD.

9.2 Prospects for Restoration

The question of how the worked out sites would be restored should be a significant issue in the determination of which areas are put forward as part of the draft Strategy. However, it is not apparent that any consideration has been given to this matter by the County Council.

It would be reasonable to expect that mineral workings *“should be restored within a reasonable timescale to an after-use appropriate to the location and which is sympathetic to the character of the surrounding landscape. Proposals for restoration, after-care and after-use should be submitted with applications for mineral working and should accord with District LDF policies, including environmental protection, countryside enhancement and noise management.”* and that planning permission will not be granted unless it can be demonstrated that there is *“...a high quality, phased restoration scheme....”*. These proposed policies were included in the draft OMPSC reported to the County Council's Minerals and Waste Plan Working Group of 9 May 2011, but have been watered down in the first two paragraphs of the current OMPSC Policy M6, excluding mention of District LDF policies and radically changing *“high quality”* to *“satisfactory”*.

The reason for this lowering of expectations is most probably linked to OCC's recognition in Paragraph 4.41 of the OMPSC that because of *“... a local shortage of inert waste material for infilling, most new sand and gravel workings in the river valleys of Oxfordshire will have to be restored to water bodies...”*

However, in light of the likely MOD objection, materials would have to be imported to backfill the Cholsey/Wallingford sites, at least to a level to ensure that there were no large areas of open water. Therefore restoration for the Cholsey/Wallingford area, the only “new” working proposed, is unlikely to be to agricultural use in character with the surrounding landscape and AONB, but some sort of sunken depressions, which would be wet in winter and dry in summer.

Furthermore as the sites are in the floodplain there would be an Environment Agency objection to the use of any waste materials other than ones that are inert in nature, i.e. naturally occurring soils and stones. Considering site SG33 only, with a proposed general depth of extraction of 6.0 metres and the water table at about 1 metre below ground level, a volume in excess of 3 million tonnes (2 million cubic metres) of material would need to be imported to the site. It is highly questionable whether it would be feasible or desirable to import this level of material to the site, given the distance of the Cholsey/Wallingford sites from the main source of such material (which would be Oxford), and both the extra lorry movements and additional time it would add to the duration of the development.

At the proposed extraction rate of 200,000 tonnes per annum, the mineral working could be expected to last about 25 years. Inert fill could not be sourced and imported at anywhere near that rate, and even given some potential overlap of the operations, the site is likely to be operational well in excess of 50 years until finally restored, with all the consequential ongoing harm to local interests of acknowledged importance, including the District LDF policies and the surrounding AONB.

10. Impact on Roads

10.1 Impact on Local Roads and Road Network

The roads in this area of South Oxfordshire are already under great pressure and this will become increasingly so due to:

- Rapidly increasing population as identified under section 7.1 in this submission.
- Traffic generated by nearby Didcot, designated a 'growth town'. Wallingford and its bypass, and the A4130 beyond, form a major east-west route to and from Didcot.
- The designation of Milton Park and Science Vale as an Enterprise Zone means that much of the job creation for new residents of Wallingford will be in that area. This will result in increased traffic movements to and from Wallingford.
- The close grouping of Wallingford and its neighbouring settlements, all set to be allocated more housing, which in view of their close interdependence will result in increasing traffic in the area.
- Significant 'out of town' planned developments at Mongewell Park (Carmel College) and CABI with 160 and 189 units respectively and with the prospect of housing development on the site of South Oxfordshire District Council offices at Crowmarsh will result in significant increased traffic movements. These are housing developments which will be close to the town but too far away to expect that the car will not be the primary means of transport.
- The District Council's and Town Council's drive to open up this area of South Oxfordshire, and in particular Wallingford, to a greater number of visitors. This is a policy considered essential to the future prosperity of Wallingford and its hinterland.
- The demographic change to smaller average household sizes which will tend to result in a move towards one car per adult rather than in many cases a shared car per family.

In the report to Oxfordshire County Council's Minerals Working Party on the 30th March 1987 [see Appendix III], when on a previous occasion gravel extraction near Wallingford was proposed, David Young, the Director of Planning and Property Services, stated in its Appendix A, Item 5:

"Although the Wallingford bypass would overcome most local access problems the impact of gravel lorries on routes radiating from Wallingford remains a concern. The nearest major roads are the A34 and M40; the A423/A4074 being an Inter-Town route between Oxford and Reading only (see Diagram 1). Eastwards towards M40 and London the direct routes are B4009 through Watlington and Benson; A329 through Warborough, Stadhampton and Little Milton and A423 through Henley. It may be possible by routeing agreements to discourage many of the gravel lorries from using B4009 and A329 to reach M40.

"In sum, therefore, the Wallingford Bypass is likely to overcome local access problems although there remains a concern about the consequences for radiating roads."

The diagram referred to in that report [see Appendix III] very clearly depicts the nature of the road network and, other than the construction of the Wallingford bypass, there is little change to these radial routes. There has however been a dramatic increase in population and traffic movements through this area of South Oxfordshire over the intervening twenty-four years and in consequence the statement in 1987 that *"the Wallingford bypass is likely to overcome local access problems"* is unlikely now to be valid.

Many of the roads are totally unsuitable for significant heavy lorry movements and a prime example of this is the A4130 between Wallingford and Didcot.

The County Council currently contends that by extracting sand and gravel at Cholsey, this results in the most favourable 'tonne/miles to market'. From this the implication is that lorry

movements will be confined to a very local area and therefore will not result in added pressure on these radial routes. We do not consider this will be the case because:

- The County Council has no control over where the sand and gravel will be used. This will be dictated by market prices and developer's decisions.
- The report to the County Council Minerals Working Party in 1987, referred to above, stated that the gravel from this site *"is not capable of producing structural concrete without the addition of stone. It does not replace the higher quality gravels at Sutton Courtenay."* This means that it will be transported to locations where there is an appropriate use for this quality of gravel or that it will be used locally in combination with stone brought into the area. Either scenario will mean significant lorry movements on local and radial routes. The statement in 1987 that the Cholsey site could not, due to the quality of gravel issues, replace the Sutton Courtenay site is in total contradiction to the statement in paragraph 11 of the Executive Summary in the current draft Minerals Strategy.
- Even if the gravel were used within, say, a 20-mile radius of the proposed site it would still necessitate the use of many of the radial routes from Wallingford.

The bypass was built with a view to relieving the nationally important historic Saxon town of Wallingford with its narrow streets and poor air quality from excessive traffic. This was largely successful for the years immediately after the construction of the bypass but progressively the traffic levels have been increasing. The bypass is a small two lane road, not designed to take significant heavy lorry movements over a prolonged period. With the hazards, dust, mud and disruption which would be caused by lorries travelling to and from the extraction site it is very likely motorists will be deterred from using the bypass and will again choose to drive through the town thus negating the whole purpose of the bypass.

OCC have already been warned by their own consultants Scott Wilson (August 2011) about the *"long term adverse cumulative effects on the environment and on the local communities from sharp sand and gravel working. These include ecological, visual and local landscape impacts, air and noise pollution from HGV movements, traffic congestion, GHG emissions and impacts on the water environment... Cholsey is then (after 2020) expected to experience similar impacts..."* Their report also confirms that *"there is potential for negative transport impacts along the A4130 and A4074 associated with working in Cholsey"*. These statements reinforce CAGE's view that gravel extraction would have a totally unacceptable environmental impact on the both the local roads, the two communities of Wallingford and Cholsey and other neighbouring parishes.

10.2 Site Access

For the proposed sites SG33 and SG57 any site access would have to be either onto the Wallingford Road, which runs from Cholsey to Wallingford along the eastern side of the site, directly onto the bypass or on a further road directly off the roundabout.

Wallingford Road is a narrow road with significant fast moving traffic, being the main link road between Cholsey and Wallingford. It is also used by many cyclists and is the route from Wallingford, and other areas north of Cholsey, to the mainline railway station. If the site access were to be onto this road then all the lorries would have to transit onto the bypass via the roundabout at the north end of Wallingford Road. As this roundabout is within 100 metres of a second roundabout at the junction of the bypass with the A329 (a roundabout which is already very busy) this would create a very dangerous convergence of traffic.

An access on the bypass would be equally dangerous. The length of the northern edge of SG33 is relatively short and may be shortened further by the need to retain the access to Cox's Farm. Any access onto the bypass would therefore be very close to the existing 'twin roundabouts' at the end of the Wallingford Road and on the A329.

It is known from discussions with the County Council highways engineers in relation to access points for new housing developments, that a further roundabout would not be acceptable because the impact on traffic would be such as to deter use of the bypass in total conflict with the reason the bypass was constructed. The alternative would be acceleration/deceleration lanes which, so close to the existing roundabout, would be impractical, dangerous and again would deter other traffic from using the bypass.

An access directly off the roundabout at the northern end of the Wallingford Road, with the anticipated number of lorry movements would make this very dangerous and a traffic bottleneck.

For the proposed site SG60 any site access by road will be very difficult as such an access would have to be very close to the roundabout on the A329. A river access would be unacceptable due to the attractive nature of the Thames in this area, disruption to the Thames Path and the extensive use of the river for rowing and other leisure activities.

11. Suitability & Selection Process of the Cholsey/Wallingford Sites for Sand & Gravel Extraction

11.1 Questionable Soundness of the Selection Process

Paragraph 4.20 of the Oxfordshire Minerals Planning Strategy Consultation Draft (OMPSC) states that the Sutton Courtenay area is likely to be exhausted by around 2020, and that the Cholsey area is proposed to come into production at about that time, to enable continued local supply of sand and gravel to markets in South Oxfordshire. CAGE wishes to challenge the robustness of this approach. In addition to the many constraints identified in the previous sections of this response, which make the Cholsey/Wallingford sites wholly unsuitable for inclusion within the OMPSC, there are several other factors which cast serious doubt as to whether the Cholsey/Wallingford sites would in fact meet the identified need for a continued local supply, or that they are at all preferable to the other sites nominated for sand and gravel extraction in South Oxfordshire.

11.2 Quality of the Reserve

As set out at sections 4.3 and 4.4 the mineral deposits demonstrate a significant level of clay, silt and fines, which would need to be processed out as a waste product, and the remaining sands and gravels are essentially medium grade sharp sand with gravels of high calcium carbonate content.

As a result the reserve would only be appropriate for limited applications, such as fill, and would be unable to meet the wide range of building applications that local (South Oxfordshire) markets would be demanding. For example it could not meet the strength requirements for structural concrete unless mixed with other high quality stone. As a consequence other higher quality aggregate would have to be imported from elsewhere in any event to meet the need for a continued supply.

11.3 Quantity of Reserve

The site nomination forms identify that the main site, SG33 would generate 4.0 million tonnes (mt) of sand and gravel from a net working area of 52.0 hectares. (The total site area is given as 66.0 hectares). This equates to about 77,000 tonnes of mineral per hectare.

However, having carried out a closer examination of the site it is apparent that the net working area would be more like 44 hectares, which would therefore give a yield of about 3.4 mt. This is based on the following assumptions:

- 15 metre margin either side of gas main running through the site
- 16 metre buffer strip to the banks of main rivers through the site. Note: no buffers have been allowed for other watercourses, which may well be required and reduce the working area further;
- 20 metre buffer alongside the railway boundary, to provide for stability of the line and also to accommodate the sewer pipe that runs along here;
- 200 metre buffer zone to settlements. This is a very minimal distance and more may be required. Note: the historic distance adopted in Oxfordshire has been 350 metres;
- 100 metre buffer zone to individual residential properties (in line with historic distance adopted in Oxfordshire), though in particular for the property and listed building within the site, this distance may be insufficient to protect against nuisance and to prevent harm to the setting of the listed building;
- 5 metre buffer strip inside the hedge line alongside Wallingford Road to accommodate the cycle route, though this may need to be larger, because of amenity/safety issues;

- Retention of existing planting alongside roads adjoining the site;
- 10 metre buffer to and retention of access to Cox's Farm, which crosses the northwest corner of the site. The triangle of land in the northwest corner of the site beyond the Cox's Farm access and bordered on other sides by the A4130 and the railway line is therefore assumed to be too small and, with the added complication of transporting mineral across the access to Cox's Farm, not economical to be worked.

It is apparent from the site operator's geological report on the site that many of these constraints have not fully been taken into account in arriving at their estimate of the reserve.

Notably the County Council's report to their Minerals Working Party which considered this site in March 1987 estimated that the yield from the site was approximately 3.0 mt (paragraph 3 of the report at Appendix III) This reduced level of reserve coupled with the poor quality of the material, which would demand a higher level of processing to maximise the potential of the material, and an overall lower return, reduces the economic viability of the site. Significant investment will be required to finance the site infrastructure, such as a new high standard access and a processing plant.

11.4 Deliverability

The proposed site operator of the Cholsey/Wallingford sites (SG33 and SG57), Smiths of Bletchington, has other mineral workings at Gill Mill within the Lower Windrush Valley (LWV), in West Oxfordshire, and in light of the above identified financial implications is likely to wish to work these reserves first, then transfer their Gill Mill processing plant to Cholsey, rather than install a brand new plant.

The existing reserves at Gill Mill are identified at Annex 4 of the County Council's report to Cabinet of February 2011 (at which it was agreed to pursue the draft Minerals Core Strategy) as lasting a further 10 years: The existing Gill Mill complex was granted planning permission in 2001 (no.: 0109/94) until 2010; the other quarry identified in the LWV with a life of 8 years is Hanson's at Stonehenge Farm, Northmoor.

The proposed capacity per year from the LWV (as identified from the table at Annex 4 of the February 2011 Cabinet report) is 500,000 tonnes per annum (tpa). As the Northmoor site has a proposed annual output of 200,000 tonnes (1.55 mt over 8 years), the Gill Mill site has an annual throughput of 300,000 tpa. This volume is consistent with the historical output from Gill Mill, as identified in the original application for the Gill Mill Complex.

The same Annex identifies a total of 14.5 mt of potential further reserves within the LWV through site nominations. Of these potential new reserves 11.6 mt are in land nominated by Smiths, of which 10.9 mt would be worked through Gill Mill. In fact OCC's preliminary assessment tables identify that pre-application discussions are already taking place on site nominations SG21, 22, 23, 24 and 34, which in combination would provide an additional reserve of 8.9 mt. As these sites would be an immediate extension to the existing complex it is very likely that they will go ahead and thus the Gill Mill complex would continue for at least a further 39 years in total (existing 10 years of reserves plus 8.9 mt/300,000 tpa).

As such the Cholsey/Wallingford sites are very unlikely to become operational by 2020 or in fact even by the end of the strategy period.

A further factor to strengthen the conclusion that Smiths would be reluctant to operate their Gill Mill site and the Cholsey/Wallingford sites concurrently is that, in doing so they would need to significantly increase their sales of mineral.

The reserves at Northmoor are expected to last 8 years and there is the potential of a small extension of 0.5 mt (site nomination SG18), which means the supply from this quarry would last until about the 2020 mark. After this point in order to maintain a supply of 500,000 tpa from the LWV (the rate identified in the table at Annex 4 of the February 2011 Cabinet report) the only realistic options are for Smiths to increase their production rate at Gill Mill, or for

a new quarry to be created at SG39, 32 and 34. However, whilst SG39 is a Cemex site, it is doubtful that the reserve of 2 mt would be sufficient to support new infrastructure, unless worked in conjunction with the adjoining Smiths land (SG32 and SG34).

In these circumstances the Strategy would have the effect that Smiths would need to provide 70% of the Oxfordshire market supply of sand and gravel, (500,000 tpa from the LWV and 200,000 tpa from Cholsey/Wallingford of a 1.01 mtpa apportionment) which would be a very difficult challenge for a single operator to meet. Even assuming that the contribution by Smiths from the LWV does not rise to 500,000 tonnes per annum, the Strategy assumes that Smiths will be providing 50% of the apportionment, which is still a big challenge. Alternatively it is highly questionable whether it is appropriate for the Mineral Strategy to be having the effect of putting such a large share of the market in the hands of a single operator.

11.5 The Distance to Markets

The main market for the supply of sand and gravel in Oxfordshire is the City of Oxford and the central Oxfordshire settlements. Furthermore, whilst there is undoubtedly demand for supply in South Oxfordshire, for example to proposed housing growth areas in Didcot and Wantage, a significant proportion of the demand for construction materials is not for housing but for roads.

At the stakeholder meeting of 29 September 2011 organised by the Council, the minerals industry confirmed that the destination of sands and gravels will be determined by market forces, probably half going north towards Oxford and a similar amount west towards Didcot and beyond. Furthermore the industry view was that in terms of haulage, the distances between the various nominated sites in South Oxfordshire are not significant. All of the other sites are closer to Oxford than the Cholsey/Wallingford sites, and none of the areas would be materially closer to the market than any other.

Smiths are themselves clear that much of the gravel from the Cholsey/Wallingford sites would go to Oxford. Their site nomination forms appropriately identify a 50%/50% split between Oxford and South Oxfordshire for the destination of the material.

In light of this situation, the promotion of the criterion 'tonne miles to market', which appears to have been important in the site selection process and the perceived benefit of the Cholsey/Wallingford sites as closer to areas of demand for construction materials in South Oxfordshire (see paragraph 19 of the Council's report to Cabinet of February 2011) is not justified.

11.6 Site Selection Process

For this reason and for many others it is apparent that the Council's conclusion that Cholsey/Wallingford is the most preferred area for gravel extraction in South Oxfordshire is not robust.

As mentioned in the introduction to this submission, the County Council has not started with the premise of determining where the sand and gravel resource is within South Oxfordshire, and then proceeding to sieve out highly constrained areas or rank areas by their benefits in order to arrive at a potential new source of supply. Rather they have relied on sites nominated for mineral extraction, and have made a very rudimentary assessment of the sites in order to arrive at the proposed strategy.

The County Council argues that a detailed analysis is not necessary for the Core Strategy, because that is for the site allocations document. Nevertheless, it is the case, and the County Council has confirmed (see point 21 of the note of meeting between CAGE and County Council Officers of 12 September 2011 at Appendix II) that the proposed new area at Cholsey (part ii of Policy M3) comprises the three sites SG33, 57 and 60, not some broader area. As the new area is so site specific, a more detailed assessment is in fact very necessary in order to confirm the viability of the site, and to ensure that the strategy can be delivered.

11.7 South Oxfordshire Sites Comparison

The attached table: **Appendix I, CAGE Sites Assessment** (based on OCC's preliminary site areas), provides a more detailed assessment of the potential sites expanding on the Council's preliminary site assessment table (background paper) to include factors that should have been taken into account. This shows that the Cholsey/Wallingford sites are amongst the sites that score the least favourably.

The sites rank in order of most preferable sites as follows (positive scores given in brackets):

- | | | |
|-----|-------------------------|------|
| 1. | SG59 Stadhampton | (12) |
| 2. | SG42 Nuneham Courtenay | (11) |
| 3. | SG09 Drayton St Leonard | (10) |
| 4. | SG17 Culham | (10) |
| 5. | SG13 Shillingford | (9) |
| 6. | SG41 Lower Radley | (9) |
| 7. | SG60 Wallingford | (9) |
| 8. | SG57 Cholsey | (8) |
| 9. | SG03 Benson | (7) |
| 10. | SG33 Cholsey | (6) |

Alternatively if the sites are considered in terms of negative impacts, which includes some additional weighting for important national designations such as AONB and Historic Parks, the sites rank as follows (negative scores given in brackets):

- | | |
|-------------------------|------|
| SG59 Stadhampton | (1) |
| SG09 Drayton St Leonard | (3) |
| SG17 Culham | (3) |
| SG42 Nuneham Courtenay | (3) |
| SG13 Shillingford | (4) |
| SG41 Lower Radley | (4) |
| SG60 Wallingford | (6) |
| SG03 Benson | (7) |
| SG57 Cholsey | (8) |
| SG33 Cholsey | (10) |

However, it is also worth pointing out a few key issues about some of the sites.

SG13 Shillingford: The main issue that counts against this site according to the Council's preliminary site assessment is archaeology. It is accepted that there is a Scheduled Ancient Monument (SAM) within the site and other areas of archaeological importance. However, it should be noted that according to the site nomination forms the estimated yield of 5.3 million tonnes would be derived from about a third of the total site area, and so a considerable amount of the site would not be worked, no doubt to protect the SAM and archaeological interest (as well as provide appropriate buffers/working margins etc). Consequently the site should not be blanket discounted on archaeological grounds.

SG17 Culham: It is not apparent from the Council's preliminary site assessment table why this site has not been taken forward. However, the Council advised in an email dated 2 August 2011 (see Appendix IV) that it was because of issues with access and the impact of HGVs on congestion and local amenity (even though the site has direct access onto an A road). The same issues are equally applicable to the Cholsey/Wallingford sites.

SG09 Drayton St Leonard/SG59 Stadhampton: Whilst no reason to preclude site SG59 Stadhampton is identified, SG09 is coloured red as not to be considered on archaeological grounds in the preliminary site assessment table. This conclusion is not consistent with the Council's report to Cabinet of February 2011, which states at paragraph 12 and at Part B. 15. h) of Annex 2 that all sites within the Drayton St Leonard-Stadhampton area are potentially deliverable. Notably the Cholsey/Wallingford sites fall within an area of archaeological restraint identified by South Oxfordshire, yet the appropriate level of caution has not been applied to them as has been done for SG09.

SG41 Radley/SG42 Nuneham Courtenay: It is apparent from Part B. 15. d) of Annex 2 to the Council's report to Cabinet of February 2011 that the Radley site has been discounted because it would not be deliverable in the first 10 years of the plan period. This statement is at odds with the nomination forms for the site, which state that there are no known legal or time constraints. Nevertheless, as it is clear from the table at Annex 4 to that report, that the Sutton Courtenay supply is likely to last a further 11 years, this also does not seem to be a justifiable reason for not pursuing this site. It is furthermore apparent from Part B. 15. d) of Annex 2 to the Cabinet report that the archaeological and historic environment is seen as the main factor in discounting the Nuneham Courtenay site. This decision does not sit comfortably with the equally important archaeological environment of the Cholsey/Wallingford sites, where two listed buildings would also be directly affected (a situation which is not the case with any other of the nominated sites), and the impact on the North Wessex Downs & Chilterns Areas of Outstanding Natural Beauty, which must have at least equal if not more weight than the Historic Park designation and deserve protection.