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Mary Thompson
Senior Planning Officer
Oxfordshire County Council
Environment & Economy
Speedwell House
Speedwell Street
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OCC ref: MW.0157/15

4 January 2016

Dear Mrs Thompson,

Scoping Opinion

Request for Scoping Opinion for proposed sand and gravel extraction at New Barn Farm, Reading Road, Cholsey, Oxfordshire, OX10 9HA

CAGE considers that any minerals planning application on this site will be premature, on the following grounds:

- a) based on the average sales of sharp sand and gravel in Oxfordshire in the last five years of 507,000 tonnes, the county currently has 24 years and 7 months of permitted reserves, well in excess of the 10 years required by Government Policy (see Appendix 1 below); and
- b) Oxfordshire's Core Minerals Strategy has not yet been submitted to the Department of Communities and Local Government, let alone adopted.

Notwithstanding the above, we recognise that you are obliged to respond to a scoping request. We therefore consider that, as well as the areas already identified, the following matters should be addressed in the EIA:

Hydrology, Fauna & Flora

- The site is located over a main aquifer which appears to flow towards the River Thames in a south-easterly direction. The distance from the eastern boundary of the site to the Thames ranges from 560m to 960m. This stretch of the Thames is part of the Thames Wallingford to Goring Conservation Target Area ("W-G CTA"). We note that in carrying out its search for European or nationally important wildlife sites, the applicant did not identify this locally important site, something that we consider

perturbing. The impact of operations on the flora and fauna of the W-G CTA (which include nationally important species), particularly during the summer, needs to be carefully assessed.

- The fall in elevation from the eastern boundary of the site to the Thames ranges from 5.4m to just 3.1 m. The shallow gradient of the water table is further demonstrated by the fact that parts of the application site are prone to surface flooding (as also pointed out by the County Drainage Engineer). In order to correctly assess the impact of the workings on the aquifer and therefore the W-G CTA, we consider that the applicant's proposal to rely on hydrological data in the public domain is inadequate. We consider that a proper piezometric survey is required.
- The applicant is proposing that the workings are back filled with "inert material" once the minerals have been extracted. We are concerned that, once in place, these materials may have an impact on the aquifer and the River Thames, and therefore on the fauna and flora of the W-G CTA. We are further concerned that with the increased recycling of demolition and construction waste (as a consequence of widespread application of site waste management plans) there may not be adequate amounts of inert material to restore ground levels on the site. We therefore feel that the EIA should detail the sources and nature of the inert material to be imported, and demonstrate the impact of these materials on the aquifer, flora and fauna.
- Otters have been seen in the stream close to the proposed workings. The ecological impact assessment should therefore specifically take into account the possible presence of otters in the land in the applicant's ownership immediately to the south of the proposed workings, and the impact of the workings upon them.
- The site itself is currently undisturbed and supports a rich variety of birds as is regularly recorded in the Cholsey Parish magazine. We would therefore expect a full ornithological survey to be carried out as part of the EIA.
- The applicant notes that it has identified a protected reptile species on the proposed site. We surmise that this is the same species found on the W-G CTA. As the applicant has recognised, the potential effects of the proposed development could extend beyond the boundaries of the site and we consider that this is such a case: we are of the opinion that the Ecological Impact Assessment should consider in detail the impact on the total local population of this species; in particular, translocation of individual reptiles from the proposed site may render the remaining population in the area surrounding the site unviable.

Traffic

- The applicant proposes to use the A4130 as its primary route to and from the site. As Oxfordshire County Council itself has pointed out in its responses to Planning Application P14/S2860/O, Slade End Farm (Site "B"), Wallingford regarding the impact of that development on the A4130,

“It was found, and acknowledged, that the Portway and Crowmarsh Roundabouts and to a lesser extent the Winterbrook Roundabout, are presently at capacity, with RFCs on some arms at or above 0.85. In the horizon year of 2024, baseline flows even without development (of 550 homes at Site B), were predicted to rise further, with 1.0 RFCs and above on some arms.”

- We therefore cannot understand why the County’s Highway Authority has decided that a Transport Assessment is not required. By our calculations, the site will require approximately 70 vehicle movements per day to export won minerals and import fill materials. Additional movements will be required for staff and service vehicles. We are therefore of the opinion that a Transport Assessment is absolutely essential, and that it should examine the cumulative impact of vehicles from the site over and above both existing traffic and the traffic that will be generated by Site B and the CABI redevelopment.
- The Traffic Assessment should include an assessment of the impact of the proposed development on the new cycleway between Cholsey and Wallingford which runs immediately to the east of the site. Specifically, it should examine the impact on children going to and from Wallingford school, and commuters going to and from Cholsey station.

Archaeology

- It is becoming apparent from field work carried out in support of housing planning applications that there is evidence of both Roman and Anglo-Saxon settlement outside the historical boundaries of Wallingford. It is clear from nearby villages that Anglo-Saxon dispersed settlement patterns were in use in the area (c.f. Cholsey) prior to King Alfred consolidation the population in Wallingford, fortifying it and making it a “Great Burh”. Likewise, historical maps show evidence of Roman finds in the area adjacent to the northern part of the proposed site. However, as archaeological studies in the area have tended to focus on Wallingford Castle, little attempt has been made to identify the pre-9th century settlements. We are therefore of the opinion that a desk based assessment as suggested by the Archaeological Team Leader will be inadequate. Instead we consider that a geophysical survey is a necessity to avoid the possibility that important pre-9th century settlements are not identified before gravel working commences.
- It has been postulated that a late Iron Age/early Roman boundary structure comparable to Grim’s Ditch existed on the west bank of the Thames. If this is the case, its course would likely take it across the northern part of the proposed mineral workings. In our opinion, the archaeological assessment should specifically consider this.

Air Quality

- We disagree with the applicant’s contention that an air quality baseline study is not required; during dry periods, dust from agricultural activities can result in sharp

reductions in air quality. We are concerned that without the baseline study, during operation dust emissions from the site could be blamed on farming.

- As well as considering the impact on properties bordering the site and the Mongewell nursery, we consider that the air quality assessment should also focus on the impact on the residents of Winterbrook, who are immediately down-wind of the proposed site. We also consider that, as it is a maternity hospital, the air quality assessment should specifically include Wallingford Hospital.

Noise & Vibration

- Whilst the applicant has committed to carrying out a full noise assessment, they have not detailed the standard to which the assessment will be carried out. As with dust, the impact of noise on properties in Winterbrook is a cause of concern as it is down wind of the site. We therefore consider that as part of the noise impact assessment, a baseline study to determine background noise levels at nearby properties should include properties in Winterbrook. Without the background noise study, it will not be possible to set a noise limit of 10dB(a) ($L_{A90,1h}$) above background at nearby and down-wind residences.
- We expect that the applicant will be required to assess the impact of ground vibrations on surrounding properties.

Heritage, Tourism & Recreation and Landscape

- We note that the applicant has made no mention of the impact of the proposed development on Heritage and Tourism. We consider that the impact of the proposed workings on the following should be specifically considered:
 - the Agatha Christie Trail:
 - the Cholsey & Wallingford heritage railway (both of which run along the north-western site boundary)
 - the Mill Brook 5 mile circular walk (which takes in most of the Agatha Christie Trail and is which is used extensively by Cholsey and Wallingford residents for recreational and exercise purposes).
 - The listed building within the site.
- Cholsey and Wallingford are two distinct settlements that are closely related but with separate identities. The proposed development would have a major impact on the character of the land between the two settlements, which will alter the spatial relationship. This impact needs specific consideration.
- The impact of the proposed development on North Wessex Downs and Chilterns AONBs (which is 600m from the site) must be considered.

Socio-Economic Impacts

- The applicant has stated that the socio-economic impact assessment will address wider impacts: In our opinion this should include the impact of the development on the land south of the existing Hithercroft industrial area (Site D) which is zoned for commercial development in SODC's Core Strategy. We are concerned that noise, vibration, dust and traffic from the proposed mineral workings, taking place as it will over a period of 20 years, will render this site unattractive for development. We consider that this is a key issue: Wallingford and Cholsey are both growing. Together there are already over 750 new homes either with planning permission or in construction, and we have been warned by the District Council that we will be expected to take further allocations of housing. Site D is the last site available to us to develop for much needed employment use, with an increasing trend towards Hi-tech employment. As such, the potential socio-economic benefit in terms of jobs created at Site D is much greater than the handful of jobs that will be created by mineral working.

Utilities

- The north western boundary of the site contains the rising sewer that takes effluent from Wallingford to the Cholsey Waste Water Treatment Plant. From discussions taking place regarding the development of Site B, we understand that not only must this line be protected, but space must be found for an additional line to cope with the growing population. The Environmental Impact Assessment must specifically address this issue.
- There is a gas main running to the west of the site. The impact of the proposed development on the gas main should be considered.

Yours sincerely,



Cllr Adrian Lloyd

Appendix 1 Sharp Sand & Gravel Sales and Reserves

All data extracted from the Draft Core Minerals and Waste Strategy 2014, communications with Oxfordshire County Council and the Aggregate Minerals Survey 2014 for England and Wales.

Year	Sales (to nearest 100,000 tonnes)
2010	455,000
2011	489,000
2012	559,000
2013	401,000
2014	639,000
Total	<u>2,543,000</u>
Rolling 5 Year Average	<u>509,000</u>

Sharp Sand & Gravel Reserves

Reserves at end of 2014:	7,283,000
Extracted in 2015 (estimate):	-680,000
Reserves added in 2015: Gill Mill	5,000,000
Thrupp Lane	925,000
Reserves at end of 2015:	<u>12,528,000</u>

Life of reserves at 5 year rolling average: 24 years & 7 months