

Mary Hudson
Principal Planning Officer
Oxfordshire County Council

Clr Katherine Foxhall
Clr Viral Patel
Watchfield and Shrivenham ward
Vale of White Horse District Council

Dear Ms Hudson,

Re: MW.0151/23, Outline Flexible Planning Application at Former Wicklesham Quarry, Faringdon, Oxfordshire, SN7 7PH.

Thank you for the invitation to respond to additional reports and the proposed changes submitted by the applicant on this former quarry site. In our view, our earlier consultation response still holds and the additional material submitted by the applicant and the minimal changes proposed do not materially change this planning application.

We stated in our earlier response that the impact on the rural Vale and specifically the villages of; Little Coxwell, Great Coxwell, Fernham and Longcot would be significant. The changes proposed in this outline application (which are subject to change) by the applicant go a short way towards reducing the visual impact of the development from certain viewpoints, but do nothing to address the impact on traffic, ecology, Local Plan adherence, impact on landscape, highways and access and sewerage and water infrastructure.

We respond here once again in our capacity as ward members for Watchfield and Shrivenham District Council ward, which is within a few hundred meters of the site proposed to be developed.

Development Plan

Our earlier comments in relation to the conflict between the Vale Local Plan, and the Faringdon Neighborhood Plan (FNP) still hold, we see the proposal on this site as in conflict with the Vale Local plan and any development on this site as speculative.

We note the applicant has chosen to highlight the merits of the development against some aspects of the FNP while disregarding or minimizing the aspects of the Vale Local Plan 2031 Core Policies which the application conflicts with.

Further details are included in our earlier consultation response.

Precedent

As noted in our earlier consultation response, granting this permission would set a precedent for the industrial development in the rural Vale. This application is a departure from the Vale Local Plan in allowing for the first time a built-up area to straddle both sides of the A420, further this conflicts with LP Core Policies 37, 38, 44.

Further details are included in our earlier consultation response.

Not a Brownfield Site

We outlined in our earlier consultation response that the applicant's assertion that this site is brownfield is inaccurate. As we noted earlier the definition of brownfield land "includes land used for mineral extraction and waste disposal where provision for restoration has **not** been made through development control procedures", OCC having put a 5-year aftercare provision negates any provision of this site as brownfield.

The applicant has de-emphasised the "brownfield" terminology in recent submissions however, following the Vale Ecology officer's report from February, which highlights the biodiversity net-gain calculation as unjustifiable, the applicants response highlights the calculation is performed on the basis that the development site is excluded from this calculation and only the outer rim was considered from the biodiversity perspective. This highlights that current assessments carried out by the applicant are in effect as measured against a brownfield site.

Further details are included in our earlier consultation response.

Impact on Landscape

We recognize the applicant has proposed a reduction in the height of the buildings to be constructed. This minimally reduces the impact on the landscape from a visual perspective if observed from specific points, however, to maintain the capacity the footprint of buildings is increased, negating any improvement.

The height reduction proposal was part of an earlier suggestion by the applicant, so we do not see any material change here which addresses the policies outlined in the FNP policy 4.5B. Given that this is an outline application only for access, it is hard to see how any visual impact reductions can be taken at face value.

Further details are included in our earlier consultation response.

Highways and Access

Please see our earlier response on highways and access. We feel they are still applicable, and the applicant's response does not go towards addressing them.

However, we note the applicant has added additional modelling in relation to traffic flows in Traffic Assessment Technical Note 2. The assessment appears to indicate the roads would be over capacity in 2025 and 2029, but that capacity mitigation put in place due to planned development elsewhere would help address this, meaning the applicant need do little to address the matter.

The applicant does note "The effect of introducing sustainable travel measures for the site should therefore assist in reducing the traffic impact of the proposed development", but it is not clear what is meant by sustainable travel here, and what guarantees there are that such measures will (1) be adopted by occupants (2) reduce the capacity needs on the road network. As such, any such mention of these measures is wholly speculative and does not go at all towards addressing any of the concerns around the impact on highways and the rural road network in proximity to the site, particularly around the rural villages in our ward where residents frequently see A420 traffic divert through the villages of Fernham, Little Coxwell and Longcot to avoid traffic on the A420.

Biodiversity and Geological Significance

We highlighted several reports that should be considered before determining this application in our earlier response. We feel this is still applicable and further note particular attention should be given to the comments of the Vale Ecology officer's report (Feb 2024) and OCC Arboricultural officer's report (June 2024).

The applicant continues to downplay the impact on ecology, while continuing to treat the site as a brownfield site in principle if not in name. As highlighted earlier, this is evident from the comments of the Vale ecology officer on the calculations of BNG and the applicant's response to that report emphasizing that the BNG calculation excludes most of the site from ecology concerns.

We note the applicant has submitted an Arboricultural Impact Assessment (AIA May 2024). In this they highlight the need to remove 4 mature trees, 3 groups of early mature trees, partially remove a further 3 groups of young trees (made up of 250+ individuals) and one hedge. Most of these proposed removals are of established trees in good health, and as such any justification for these removals needs to be well founded and not solely based on convenience.

Each of these removals will result in a loss of biodiversity and a reduction of habitats; the OCC Arboricultural officers report particularly highlights that the "partial removals" from the larger groups are problematic as the AIA arbitrarily defines trees as being of limited or low value and the quantity of removals is unspecified. The applicants' own impact assessment notes there are no trees with protection orders in place on the site, and as such once planning permission is granted removals and thinning of trees can proceed without any further consultation. It would be risky to accept the AIA as presented at present, as any granting of planning without first capturing specifics in conditions, in terms of quantity of removals and specific identification of which trees are to be removed, along with a concise justification of the need to do so could decimate any biodiversity gain achieved through restoration conditions placed by the aftercare provision on this former quarry.

The applicant does not dispute the site's significance as a geological site, but continues to emphasise the significance of the exposed rock walls on the outskirts of the site only. However, the designation applies to the whole site and not just to exposed walls, and it is the whole site that is of scientific significance. Once concrete footings are in place and buildings erected there is no possibility of accessing the bulk of the site for any research purposes.

Sewage infrastructure

Since our original response, we have seen no improvements in this regard, please accept our earlier comments as stated.

Thank you once again for allowing us the opportunity to respond to this application.

Cllr Katherine Foxhall and Cllr Viral Patel