

# CASE REF: APP/U3100/V/23/3326625

## Corridor between the A34 Milton Interchange and the B4015 north of Clifton Hampden.

### NEIGHBOURING PARISH COUNCILS - JOINT COMMITTEE (NPC-JC)

## SUMMARY PROOF OF EVIDENCE ON LANDSCAPE

### ALAN JAMES BSc MA MLI (RETIRED)

1. My name is Alan James. I have a BSc Honours in Geography (University College London), an MA in Landscape Architecture (University of Sheffield), and am a retired chartered Member of the Landscape Institute (MLI). I have worked as a landscape architect since 1973, and from 1996 also worked as a consultant on sustainable transport. I have been an expert witness on both landscape and transport matters in over 20 public inquiries since 1996, including several major road schemes. I have worked on behalf of the NPC-JC since November 2021, shortly after the submission of the HIF1 planning application.
2. The HIF1 application was rejected by Oxfordshire CC (OCC) Planning and Resources committee (PRC) in July 2023 but was called in by the Secretary of State a week later. The PRC reviewed its decision of July 2023 at a meeting in September 2023, and resolved that because of two changes to tree planting offered by OCC as Applicant (OCC-A) any outstanding issues could be resolved by Conditions. The significant adverse landscape impacts of HIF1 are fundamentally linked to the presence and alignment of the road, which no amount of tree planting can overcome. OCC LPA seek to present the PRC's position as neutral for inquiry purposes, but this should not alter the fact that the July 2023 decision was *made*, even if OCC could no longer *enact* it.
3. The central argument of this landscape proof of evidence is that OCC-A have identified several large adverse landscape impacts in the section from Didcot via Culham to Clifton Hampden, but have sought to downplay their significance. It is suggested that these effects are minimal at the scale of local Landscape Character Areas, by which argument all development has at most a minor adverse landscape impact if the scale of comparison is big enough. It is further argued that all roads have large adverse landscape impacts, implying that this is not in itself a factor to set against any given road scheme. The correct assessment should be that large and significant landscape impacts create a very high bar against which scheme benefits should be measured.
4. The playing down of large adverse landscape impacts is especially weak in relation to WebTAG guidance (TAG Unit A3), above all WebTAG's 'most adverse category' rule by which the overall scheme assessment on landscape impact should be 'large adverse'.
5. The proof identifies the four most critical sections for landscape impact:
  - The Thames crossing and its impact on the Thames Path National Trail, an asset of national significance

- The squat concrete viaduct across the gravel pit lakes immediately south of the Thames, the tranquillity of which would be damaged beyond repair
- The Clifton Hampden bypass, which cuts through a quiet enclave of mature countryside on the edge of the village, easily accessed by several footpaths
- The Appleford Sidings bridge, where sensitive residential receptors are undervalued.

Appendix 1 to the proof (written for the planning application objection in January 2023) covers these locations in more detail, including photographs of the gravel pits.

6. The proof also considers the planting offer by OCC-A that seems to have satisfied both OCC LPA and the two District Councils that their concerns have been made. Semi-mature tree planting sounds impressive, but horticulturally they are no more than somewhat bigger than standard trees, not half way to maturity as the name might suggest. A planted semi-mature tree has a trunk diameter 1m off the ground of about 6cm, compared with say a 20 year old 'semi-mature' oak tree that will have a diameter of around 40cm, or a mature oak tree that would have a diameter of 60-80 cm or more.
7. The second part of the OCC-A offer is a fund for additional planting by local communities, which is fine in principle but fraught in practice, with no information on what the fund covers, land acquisition, or long-term maintenance. There has to be a reasonable expectation that this will be delivered for it to have more than limited weight in determining a planning application.
8. The two District Councils South Oxfordshire (SODC) and Vale of White Horse (VWHDC) had serious criticisms of the scheme planting in their joint submissions on HIF1. The proof looks at SODC. The general points were net loss of tree cover (5000m<sup>2</sup>), inadequate replacement planting, lack of integration of scheme planting with existing landscape patterns, and a particular concern at the loss of mature trees at the Culham Science Centre entrance.
9. The SODC landscape officer judged the application contrary to Local Plan policy ENV1 due to its failure to protect or enhance features of importance to landscape quality. In other words, HIF1 is not fully in accordance with the local development plan. By the time of the July 2023 PRC meeting, criticism had ratcheted up to disappointment in OCC-A's responses, and a feeling that *"the extent of mitigation appears to have been largely limited to within the engineering land take, rather than defined by an assessment of landscape and visual mitigation requirements"*.
10. It is hard to understand how 'up to' 50 semi-mature trees and a limited community planting scheme full of potential pitfalls make all the difference to the acceptability of the scheme to OCC LPA and the District Councils. They claim that *"these measures will help manage and mitigate the harmful effects of the development"*. It is not credible that such insignificant changes make all the difference to proposals that the SODC landscape officer describes as inadequate, very disappointing, not defined by landscape and visual mitigation requirements, failing to link with the existing landscape pattern, and non-compliant with the specific policy ENV1.
11. HIF1 has a large adverse impact on the landscape setting between Didcot, Culham, and Clifton Hampden, on sensitive and important landscape settings including that of a National Trail. The significance of landscape effects has been underplayed by Oxfordshire County Council as Applicant, and Oxfordshire County Council as Local Planning Authority has failed to take adequate account of the actual significance of effects.

Alan James  
January 2024