

Planning

HEAD OF SERVICE: **Adrian Duffield**



Emily Catchside
Oxfordshire County Council
Environment & Place
County Hall
New Road
Oxford
OX1 1ND

CONTACT OFFICER: **Adrian Butler**

registration@southandvale.gov.uk

Tel : 01235 422600

Textphone: 18001 01235 422600

Abbey House, Abbey Close
ABINGDON OX14 3JE

22 December 2022

Ref: P22/V2475/CM

Dear Emily

Re: Application R3.0138/21

- **The dualling of the A4130 carriageway (A4130 Widening) from the Milton Gate Junction eastwards, including the construction of three roundabouts;**
- **A road bridge over the Great Western Mainline (Didcot Science Bridge) and realignment of the A4130 north east of the proposed road bridge including the relocation of a lagoon;**
- **Construction of a new road between Didcot and Culham (Didcot to Culham River Crossing) including the construction of three roundabouts, a road bridge over the Appleford railway sidings and road bridge over the River Thames;**
- **Controlled crossings, footways and cycleways, landscaping, lighting, noise barriers and sustainable drainage systems.**

Location: A linear site comprising a corridor between the A34 Milton Interchange and the B4015 north of Clifton Hampden including part of the A4130 east of the A34 Milton Interchange, land between Didcot and the former Didcot A Power Station and the Great Western Mainline, land to the north of Didcot where it crosses a private railway sidings and the River Thames to the west of Appleford-on-Thames before joining the A415 west of Culham Station, land to the south of Culham Science Centre through to a connection with the B4015 north of Clifton Hampden.

Thank you for re-consulting the Vale of White Horse District Council on the above application.

The Vale of White Horse District Council continues to support the principle of the proposals as the infrastructure will assist in delivering the housing and employment

growth identified in the Vale of White Horse Local Plan 2031 Parts 1 and 2. Without this proposed infrastructure planned new growth is unlikely to be delivered.

Previous comments provided by this council in its response dated 4 February 2022 remain applicable and this council's further observations on the proposals are set out in the table below:

Planning Team – Development Management

Bridges

In response to this council's comment that the Science Bridge should be a landmark feature as envisaged in the Didcot Garden Town Delivery Plan (the DGTDP), paragraph 3.3 of the Aecom EIA Regulation 25 response states *"Given the recent plans for large monolithic data centres and warehousing immediately north of the Science bridge the appropriateness of a 'spectacular bridge' structure may now be inappropriate"*.

Perceived *"large monolithic"* structures justify a 'spectacular bridge' design to enhance the approach to Didcot.

The design of the River Thames Crossing between Didcot and Culham is not revised. Appendix G (Oversized bridge examples) of the Reg 25 response, provide little confidence that the bridge will an attractive feature or sensitive to its rural setting.

The NPPF places great weight on good design. Paragraph 126 of the NPPF expects *"The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities"*.

The bridge designs by reason of their concrete materials, massing, unbroken grassed banks, lack of vertical landscaping on the approaches to the Science Bridge and on the banks of the bridge will result in them being an unspectacular and visually intrusive feature comprising poor design contrary to paragraphs 126, 130 and 131 of the NPPF, core policies 37 and 44 of the Local Plan 2031 Part 1 and the Didcot Garden Town Delivery Plan.

Tree and Hedge Planting

The DGTDP envisages Didcot as a *"super green town prioritising green infrastructure including tree lined streets"*. This aligns with the principles of core policies 44 and 45 of the Local Plan 2031 Part 1 and paragraph 131 of the NPPF. The widened A4130 is a key gateway to Didcot. To aspire to the DGTDP vision, the A4130 needs to be judiciously tree and hedge lined.

Tree and hedge planting is necessary to screen the road in views from new housing proposed on the southern side of the A4130 e.g. Valley Park, and act as a noise buffer.

Trees and hedges should visually separate the road from the cycle and pedestrian paths alongside the road.

The planting comprising shrub planting and occasional trees is weak and will not achieve the aims above or the expectation in paragraph 131 of the NPPF that streets should be tree lined.

A comparison of the landscaping and street lighting plans shows that street lighting conflicts with the proposed locations of trees and even more so if OCC requires 10m gaps between lighting columns and trees. Consequently, landscaping will be further weakened.

The proposed landscaping is considered inadequate to address the expectations of the DGTDP, core policies 44 and 45 of the Local Plan and paragraph 131 of the NPPF.

Street Lighting

Street lighting continues to be shown extending north of Didcot beyond Hartwright House (OX14 4PJ) when there appears to be no overriding need for it particularly as this is a rural area whereby the lighting will be intrusive.

Acoustic Barriers and Noise

Acoustic barriers of unspecified height but possibly 2 or 3 metres in height, beside the road leading from Didcot to the River Thames Crossing will be visually intrusive in this primarily rural area.

Given the comments made by the council's Environmental Protection Team (see below), whereby a number of residents of affected dwellings will experience significant adverse effects despite acoustic barriers and given the visually intrusive appearance of the acoustic barriers, this authority questions the suitability of the road alignment between Didcot and the Thames Crossing and consideration should be given to moving the road further west.

Environmental Protection Team – noise and vibration

Aecom's response indicates that there is little further that can be done to mitigate the noise impacts of the proposed development. This suggests that there will remain a number of properties which will experience a significant adverse impact from this development but will not benefit from the Noise Insulation Regulations 1975. The decision process will have to balance this negative impact against any benefits that the development is expected to bring.

Forestry Team

The following previous three comments have been addressed in Aecom's Reg 25 response at paragraphs 9.2, 9.3 and 9.4 respectively:

1. There are inconsistencies between the information included within the Arboricultural Impact Assessment and shown on the Tree Protection Plan and information shown within other plans submitted for the application. For example, drainage shown on the Tree Protection Plans is not consistent with the locations of drainage shown on the drainage plans. Therefore, this may lead to further arboricultural impacts than is shown in the Arboricultural Impact Assessment.
2. The submitted Arboricultural Impact Assessment has not assessed the impact of works to existing services/utilities and new services/utilities will have on trees. Works for services/utilities have the potential to cause

significant adverse impact on trees and should therefore be accurately assessed in an Arboricultural Impact Assessment.

3. It is not clear from assessing the Arboricultural Impact Assessment, whether or not all of the physical construction works that will be required to implement this project, for example any changes in land levels that may be required, have been assessed in relation to their impact on trees. The submitted Tree Protection Plans also include statements such as 'Final extent of tree removals to be determined following site clearance works and setting out of scheme'. It is therefore foreseeable that the proposed works may lead to a larger tree loss than has been identified in the Arboricultural Impact Assessment submitted.

However, other points remain unresolved and inappropriate being:

- Whilst the drainage has been amended in the vicinity of tree T24 which is a veteran tree, there still appears to be construction works proposed within the root protection area/buffer of this tree which remains contrary to BS 5837:2012, Forestry Commission and Natural England standing advice and section 180 of the NPPF.
- The preliminary landscape masterplans submitted, still do not show the level of detail required to be able to scrutinise the mitigation planting in detail, to determine whether or not the proposed planting will mitigate the proposed tree loss. Considering the extensive tree removal proposed for this application, very considerable amounts of tree planting will be required. This is essential to ensure that the scheme delivers a net increase in canopy cover to address environmental issues such as climate change and carbon sequestration, as well as the landscape and amenity benefits required to be achieved for this project. Many of the landscape masterplans submitted appear to show very limited levels of tree planting along the route of the proposed road.

Conclusion:

When assessed against both local plan and national policies the impact of the proposal is contrary to:

- Core Policies 37 and 44 of the Local Plan 2031 Part 1;
- Paragraphs 131 and 180 of the NPPF; and,
- BS 5837, 2012 Trees in Relation to Design, Demolition and Construction.

Landscape Architect

There have been very limited changes to the proposals, largely restricted to a few more individual trees and areas of planting, such that previous comments generally still apply.

The extent of planting mitigation proposed remains inadequate, figures included in 9.6 of the Aecom EIA Regulation 25 response document, show that for the scheme overall there will be over 5000m² more tree cover lost than planted, which is not acceptable. This would be contrary to Core Policy 44 of the local plan, which states development will only be permitted where it protects and where possible enhances features that contribute to the nature and quality of the landscape, including trees, woodlands, hedgerows and field boundaries. Hedges have not been included in the figures, but loss and replacement of these should also be quantified. The opportunity to plant more woodland in line with the central Government's aim to plant more trees is lost.

Overall, the proposed mitigation to the road is limited, and hasn't been designed to link into the existing landscape pattern to help to integrate the road into the landscape. Embankments in many places need to grade out more softly to better fit the topography, rather than using standard 1 in 3 gradients. The use of false cutting should be considered in preference to acoustic barriers, also where this would help assimilate the road rather than cutting across the grain of the landscape.

The landscape plans do not include sufficient information to enable a proper understanding of the scheme, such as embankments and cuttings, vegetation removed, and in some instances existing vegetation retained. In the Arboricultural Impact Assessment Report many areas of retained vegetation on the Tree Protection Plans are caveated that "Final extent of tree removals to be determined following site clearance works and setting out of scheme. Trees retained where feasible."

The proposals

Tree and vegetation removal, replacement and mitigation

- Overall, the proposed mitigation to the road is limited, with limited planting and where hedgerows have been used, they tend to follow the road accentuating its alignment. A more imaginative approach sympathetic to the existing landscape pattern could help to integrate the road into the landscape. There are numerous areas where land has been left over from the road alignment that are now likely to be too small to farm.
- The use of offsite planting should be explored where the impact of the road is difficult to mitigate, such as the viaduct section. The use of hedges with trees, larger areas of tree planting alongside offsite roads and footpaths would help limit visibility.
- It would help to have the tree and vegetation removal information marked on the Landscape Masterplan to fully understand the vegetation being lost and whether this is being replaced. For example, there are many areas where the roadside vegetation/ hedgerows have been lost but are not proposed to be replaced. Replacement vegetation is required both to soften the edge of the roads and help reduce its landscape and visual impact but also to replace the lost vegetation linkages.

Planting

- Detailed planting plans are not provided (these should be conditioned to follow) but I note the information provided on the Preliminary Landscape Masterplan Sheets does not fully tally with the information provided in the Landscape Biodiversity Plan.
- More variety of shrub species are required for the woodland edge mix, such as hazel, holly, crab apple, guelder rose which are listed in the woodland mix. I also wouldn't plant blackberries, to limit competition at the establishment phase, this species is likely to self-seed at a later date.
- Hedgerow planting should also contain hedgerow trees, there should be an indication of what species will be used for hedgerow trees.
- There are some areas of larger tree planting blocks, it may be more appropriate to rabbit fence areas of planting rather than only using tree guards. Are there any proposals for deer protection to planting?

Bridges and Acoustic Fences

- The design of the bridges does not necessary minimise their visual impacts, the viaduct supports are visually bulky, and there is minimum space to soften the northern side of the Science Bridge.

- While planting is proposed to soften the acoustic fencing, this will take time to establish and a good maintenance regime to be successful. Can a softer approach to the acoustic fencing be used? A green barrier will be prominent in views where seen against the sky, such as on bridges, alternative colours should be explored.
- Care is needed with regards to the proposed sedum treatment of some of the bridge areas. This will require bespoke maintenance to allow establishment to be successful. The cost/ benefit of this approach needs to be fully understood.

Balancing ponds

Why are all balancing ponds completely surrounded by a gravel track? This increases the artificial appearance. There should be marginal planting and tree and shrub planting associated with the balancing ponds to break up the engineered appearance of consistent slopes and improve wildlife value.

Use of embankments

The road should not be located on embankment simply to achieve a balance of cut and fill, but should be kept as low as possible in the landscape to limit the adverse impact. Surplus fill can be accommodated through appropriate creation of false cuttings.

Presentation of information

Embankment and cutting slopes should be shown on the landscape plans, also tree loss as previous comments.

Recommendations

Recommendations remain as previous comments. The mitigation planting associated with this scheme needs additional work and the scheme should provide the opportunity to create new woodland in line with the governments aims and be designed to fit in with the existing landscape pattern. Softer gradients are required for the embankments and the use of false cutting should be considered.

The issues raised in the comments above should be addressed including further clarity with regard to the extent of vegetation loss, and areas of embankment and cutting.

Countryside Officer

With reference to previous ecological comments provided by the district, the only matter that has been potentially addressed is the biodiversity metric assessment. Other matters raised are not explicitly addressed in this latest submission / amendment.

The updated BNG assessment document (Appendix R) has concluded that development can likely achieve a net gain for biodiversity. This conclusion is based upon the assumption that high value (distinctiveness) habitats will be retained and enhanced as a result of development. OCC should be satisfied that the habitat creation and enhancement proposals contained within the Outline Landscape and Biodiversity Management Plan are sufficient (and practically deliverable) to meet the relevant condition criteria of the 3.1 metric for each habitat.

Yours sincerely,

A Butler

Adrian Butler
Principal Major Applications Officer