

Planning

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23 December 2022

Ref: P22/S4168/CM

Dear Emily

Re: R3.0138/21 Notice of Submission of Further Information

Proposal:

- 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;
- Construction of a new road between the B4015 and A415 (Clifton Hampden bypass), including the provision of one roundabout and associated junctions;
- 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 South Oxfordshire District Council on the above application.

South Oxfordshire District Council continue to support the principle of the proposals as the infrastructure will assist in delivering the housing and employment growth identified in the South Oxfordshire Local Plan 2035. Without this proposed infrastructure planned new growth is unlikely to be delivered.

Previous comments provided by this council in its response dated 21 January 2022 remain applicable and this council's further observations on the proposals are set out in the table below:

Planning Officer

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 do not then justify a monolithic bridge design. On the contrary, this authority considers that a 'spectacular bridge' design is all the more appropriate and important 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 bridges will be attractive features 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, 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 policies ENV5 and DES1 of the South Oxfordshire Local Plan 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.

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 insists on 10m gaps between lighting columns and trees. Consequently, landscaping will be further weakened.

Landscape Officer

Summary

The extent of planting mitigation proposed remains inadequate, as noted in previous comments. Paragraph 9.6 of the Aecom EIA Regulation 25 response document states that, for the scheme overall, initially there will be over 50,000m² more tree cover lost than planted. No figures are given for hedgerows, the loss and replacement of these should also be quantified. There has been very little increase in planting compared to the previous proposals.

The proposal is therefore contrary to policy ENV1 of South Oxfordshire Local Plan 2035, 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, tree groups, woodlands, hedgerows and field boundaries. The opportunity to plant more woodland in line with the government's aim to plant more trees is lost.

Overall, the proposed mitigation 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 where it cuts across the grain of the landscape.

There appears to have been no consideration of alternative options at the Culham Science Centre (CSC) site entrance; this remains a significant concern. Current proposals result in an unacceptable loss of mature trees which are important in mitigating the impact of development within the CSC site, and also, due to the complicated road arrangement, limit opportunities to mitigate this; refer to previous comments. Important groups of trees are also lost along Thame Lane. All these trees currently help provide softening of the Science Centre especially in views from the south; their loss will result in additional adverse impact to that of the road, due to opening up of views of the CSC site.

The landscape plans do not include sufficient information to enable a proper understanding of the scheme, such as embankments and cuttings, and vegetation removed.

Detailed comments

Landscape preliminary masterplan 13

The planting shown does not reflect the existing landscape pattern. North of the bridge planting is limited to occasional trees and small blocks of scrub, this does not reflect the local landscape pattern of hedges and linear tree belts - a new hedgerow

along the western side of the new road up to the A415, forming the new field boundary, would fit better with landscape pattern and provide better screening.

At the bridge embankments, extend the woodland block on east side to the hedge and wrap around the balancing pond to the east and north within the red line. Extend woodland west of the road to the north and south to screen views of the road north of the river and of the bridge from the Thames path to the west, woodland has been removed here from the previous proposals.

How will the sedum blanket survive in periods of drought, presumably this is just laid on concrete?

A dark green acoustic barrier on the bridge will be viewed against the sky and will stand out making it more intrusive.

Has any change been made to the colour and thickness of bridge supports? No new photomontages appear to have been submitted.

Landscape preliminary masterplan 14

Limited changes from previous scheme, more individual trees added. Extend hedgerow on western side southwards, see comments above. Add woodland blocks at roundabout, not just individual trees and bulbs. Link short sections of retained existing hedge with new hedges. Tie in with local landscape pattern of hedges and woodland blocks. Do not emphasise the shape of balancing ponds/ roundabout, use blocks of woodland/ tree groups to disguise them and blend into landscape.

Landscape preliminary masterplan 15

No change from previous plans. There should be tree and shrub planting and marginal planting associated with the balancing pond, is it necessary to surround ponds completely with a gravel track? Add some blocks of trees as above. Add tree planting to enhance existing the hedge on south side of Abingdon Road.

Landscape preliminary masterplan 16

Little change from previous proposals, some areas of scrub added at eastern side, this would be better as woodland. Unacceptable loss of mature trees which play a significant role in screening the CSC site. Proposals around the roundabout lack any significant planting, refer to previous comments. Has any consideration been given to an alternative location to access the CSC site which would allow retention of the mature tree belt? The roundabout should not be located on embankment, this will only increase the impact. Existing ground level should be indicated on the extended cross sections

Landscape preliminary masterplan 17

Limited change from previous proposals, some additional woodland edge planting around existing properties – could the use of false cutting not have been employed here rather than acoustic fencing, at least to the north of properties? Acoustic fencing should be the last resort when there is no room for more visually acceptable methods. Continue woodland planting along the side of the slip road on the east side of the existing property to provide screening.

Loss of belt of mature trees along Thame Lane which help screen the CSC site remains a concern, could the road not be pulled south-east to avoid this? There

appears to be room to do this. Woodland planting should be included on the south-east side of the road. There should be significant planting of tree belts along this section of road, not just individual trees, both to contain the new road, tie in with the existing landscape framework of tree belts, and to compensate for loss of existing vegetation.

Landscape preliminary masterplan 18

Very little change from previous proposals. The road cuts across the grain of the landscape to the west of Clifton Hampden, emphasised by the linear belts of planting. False cutting could be used to conceal the road within the landscape and avoid the need for an acoustic barrier, as previous comments. No planting is shown on the south side of the road, south of Thame Lane; this is required to mitigate the impact on views from the public footpath. Where the tree line is severed by the road replant trees to continue the line – can more trees not be retained here, why are so many removed on the northern side of the new road?

Landscape preliminary masterplan 19

Very little change from previous proposals. As above, false cutting would be a better solution than an acoustic barrier. Include a new hedgerow and tree line along the west side of Oxford Road to strengthen the existing landscape framework and provide containment. Replace any hedge lost at the end of the scheme on the north side of Oxford Road to continue existing hedge and repair link to the hedge which runs along the field boundary to the north. Add trees to replace existing mature trees lost at this point. It is important to show existing vegetation, including hedges, on the plans so that linkages like this are not missed. Vegetation lost should also be shown.

Lighting

Is it necessary to light the road between the CSC roundabout and joining the B4015? The Abingdon Road is only lit at the CSC entrance.

Acoustic barrier

A green barrier will be prominent in views where seen against the sky, such as on bridges.

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 improve appearance and 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. It may be possible to accommodate any surplus fill through the creation of false cuttings where appropriate. Embankments should be graded out to tie in with the local topography, not kept at a standard 1 in 3 engineered slope.

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. The design of the road south and west of CSC should be revisited to see if this is the most appropriate design for this area.

Forestry Officer

Several of the issues raised in response to the initial submission have been addressed, as outlined at paragraphs 9.2, 9.3 and 9.4 of Aecom's Reg 25 response.

However, the following points remain unresolved and inappropriate:

- 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:

- Policies ENV1, ENV8, DES1 and DES2 of the South Oxfordshire Local Plan 2035;
- Paragraphs 131 and 180 of the NPPF; and,
- BS 5837, 2012 Trees in Relation to Design, Demolition and Construction.

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.

Conservation Officer

Environmental Statement:

Although the documents have been updated in part to consider impacts to Fullamoor Farmhouse, references to supporting figures are not supported by updated Chapters of the Environmental Statement – in particular Chapter 10.

Acoustic Barriers:

There are no detailed updates to proposed mitigation now that the Farmhouse has been included within the assessment. Likewise, the more detailed acoustic assessments do not appear to have been provided with this latest update to the documents. The proposed acoustic noise barrier to the west of the Clifton Hampden and the edge of the village conservation area is an unfortunate solution and it does not appear to be supported by justification or alternatives that would have less potential visual impact.

Lighting and Landscaping:

The revised Lighting and Landscaping plans do not provide adequate assurances of appropriate mitigation in the setting of listed buildings and the conservation areas. The existing entrance to CSC is characterised by the mature tree-scape and hedge-scape and the proposed new planting around the new much larger junction does not appear on the plans to offer adequate replacement. Given the raised levels of the road at the new entrance to the CSC, which will in turn raise the height of street lighting here, the replacement planting needs to be a genuine mechanism for enhancing the appearance of the area. Can this detail also be provided in section?

Construction Impacts:

It is noted that representations have been made concerning the impact during construction on the listed Fullamoor Farmhouse. Given the level of vibration impact required to damage a listed building (see *Design Manual for Roads and Bridges* and IHBC publication *Context May 2015*) the works will be sufficiently distanced from the listed building not to impact likely shallow foundations. The impact of noise during construction would not result in harm to the significance of the designated heritage asset. This is likely a valid amenity issue for the occupants but the temporary nature of this would result in the reinstatement of the existing roadside character of the farmhouse, albeit with traffic actually further removed from the main house.

Conclusion and recommendations

There is still insufficient detail to understand the impacts of proposed lighting on the significance of heritage assets or the potential success of mitigation proposed. The plans do not indicate that a suitable landscaping scheme can be employed here to offer mitigation nor has consideration of options that remove the need for embankment and raised road levels been provided.

The proposed works are considered likely to cause harm to the Listed Building of Fullamoor Farmhouse as a result of development within its setting that would erode its overall significance. The impact of acoustic barriers on the wider setting of Clifton Hampden Conservation Area is also a material planning consideration and could be improved with further design consideration.

It may be possible to address concerns and mitigate some identified impacts, but the detail required has not been provided and as such the proposals remain contrary to paragraphs 199 and 200 of the NPPF and policies ENV6, ENV7 and ENV8 of the South Oxfordshire Local Plan 2035.

Environmental Protection Officer (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.

I hope the above comments will assist in your determination of the application and if you require any clarification, please do not hesitate to contact me.

Yours sincerely,



Emma Bowerman
Principal Major Applications Officer