

**THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT GARDEN TOWN
HIGHWAYS INFRASTRUCTURE – A4130 IMPROVEMENT (MILTON GATE
TO COLLETT ROUNDABOUT), A4197 DIDCOT TO CULHAM LINK ROAD,
AND A415 CLIFTON HAMPDEN BYPASS) COMPULSORY PURCHASE
ORDER 2022**

**THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT TO CULHAM THAMES
BRIDGE) SCHEME 2022**

**THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT GARDEN TOWN
HIGHWAYS INFRASTRUCTURE – A4130 IMPROVEMENT (MILTON GATE
TO COLLETT ROUNDABOUT), A4197 DIDCOT TO CULHAM LINK ROAD,
AND A415 CLIFTON HAMPDEN BYPASS) (SIDE ROADS) ORDER 2022**

**THE CALLED-IN PLANNING APPLICATION BY OXFORDSHIRE COUNTY
COUNCIL FOR THE DUALLING OF THE A4130 CARRIAGEWAY,
CONSTRUCTION OF THE DIDCOT SCIENCE BRIDGE, ROAD BRIDGE
OVER THE APPLEFORD RAILWAY SIDINGS AND ROAD BRIDGE OVER
THE RIVER THAMES, AND ASSOCIATED WORKS BETWEEN THE A34
MILTON INTERCHANGE AND THE B4015 NORTH OF CLIFTON HAMPDEN,
OXFORDSHIRE (APPLICATION NO: R3.0138/21)**

PLANNING INSPECTORATE REFERENCE:

APP/U3100/V/23/3326625 and NATTRAN/SE/HAO/286 (DPI/U3100/23/12)

**Proof of evidence of
JANE ELIZABETH ASH
(Landscape and Visual Impact)**

Note: This proof of evidence is of primary relevance to the Inquiry into the called-in Planning Application, but addresses objections raised by remaining Objectors to the Orders in Section 6 of this proof of evidence.

1 INTRODUCTION AND QUALIFICATIONS

- 1.1 I am Jane Elizabeth Ash and I am an Associate Director Landscape Architect at AECOM and have been with AECOM for over 17 years. I hold a BSc (with Honours) in Landscape Design and Plant Science and a Diploma in Landscape Architecture, both from The University of Sheffield. I am also a Chartered Member of The Landscape Institute (LI), since 2004. I work within an 80+ UK&I Landscape Practice area within AECOM. I am a Studio Lead (with resource and line management responsibilities for a team of twelve across our UK & I regions). I am also a mentor under the LI Pathway to Chartership.
- 1.2 I have 24 years' experience in landscape consultancy, my current role is primarily the delivery of landscape design and landscape and visual assessments (LVIA) for infrastructure schemes, including highways and projects across a wide range of stages, from initial conception to the planning application and assessment stage, to the pre-construction stage, construction, and landscape management. I have assessed and designed highways schemes being consented under the Town and Country Planning Regulations and under the Planning Act. At AECOM I have delivered LVIA's and landscape design for more than ten major road schemes including the A40 Smart Corridor for Oxfordshire County Council, A6 Manchester Airport Relief Road for Stockport Council, SMART Motorway Programme (M23 J8-J10; M3 J9-14; and M62 J10-12), Area 4 MAC (M20 Chegwirth and M23 Pyecombe), A19/A1231 Pinch Points, A46 Newark to Widmerpool Improvement, Nottinghamshire, M1 Widening J10-13, A5-M1 Link Road and A14 Kettering Bypass for National Highways. I have also undertaken LVIA's and landscape design for numerous other transport infrastructure schemes including HS2 LWM CFA 026/Washwood Heath to Curzon Street, Birmingham for HS2 Ltd, Oldham Mumps and Manchester Road, Oldham for TfGM, and light rail routes from Birmingham City Centre for Midland Metro (Centro), including schemes within the Green Belt.

Scope of Evidence

- 1.3 My Proof of Evidence addresses matters raised by the Planning Inspector, which relate to "harm to landscape" concerns derived from the Planning and Regulation Committee's meeting of July 2023 (CD F2), along with design matters specifically relating to Didcot Science Bridge. I also address the Green Belt, as whilst a planning designation, landscape and visual matters are related to the perception and assessment of 'openness', because the concept of openness is not narrowly limited to the absence of built development but includes a visual dimension.
- 1.4 This proof of evidence has been prepared regarding landscape and visual impact matters relating to:
- 1.3.1 The called-in planning application by Oxfordshire County Council for the dualling of the A4130 carriageway, construction of the Didcot Science Bridge, road bridge over the Appleford Railway Sidings and road bridge over the River Thames, and associated works between the A34 Milton Interchange and the B4015 north of Clifton Hampden, Oxfordshire (Application No: R3.0138/21) (the **Planning Application**);
 - 1.3.2 The Oxfordshire County Council (Didcot Garden Town Highways Infrastructure – A4130 Improvement (Milton to Collett Roundabout), A4197 Didcot to Culham Link Road, and A415 Clifton Hampden Bypass) Compulsory Purchase Order 2022 (the **CPO**);
 - 1.3.3 The Oxfordshire County Council (Didcot to Culham Thames Bridge) Scheme 2022 (the **Bridge Scheme**); and
 - 1.3.4 The Oxfordshire County Council (Didcot Garden Town Highways Infrastructure– A4130 Improvement (Milton to Collett Roundabout), A4197 Didcot to Culham Link Road, and A415 Clifton Hampden Bypass) (Side Roads) Order 2022 (the **SRO**) (taken together referred to as the **Orders**).

- 1.5 The Planning Application was submitted, and the Orders were made, to facilitate the delivery of the Access to Didcot Garden Town Highway Improvements (“the Scheme”) which consists of a highway scheme approximately 11km in length, including converting 1.8km of single carriageway to dual carriageway, 6.8km of new single carriageway and approximately 20km of new and/or improved off-carriageway cycling and pedestrian infrastructure. Connections into the existing public rights of way network will also be provided. The Scheme also includes three over bridges.
- 1.6 The Orders were made by Oxfordshire County Council as Acquiring Authority (the **Acquiring Authority**) on 21 December 2022 and submitted to the Secretary of State for Transport on 26 January 2023.
- 1.7 The Planning Application was submitted to the Local Planning Authority (**LPA**) by Oxfordshire County Council as Applicant (the **Applicant**) on 4 October 2021 and called-in by the Secretary of State for Levelling Up, Housing and Communities for his determination on 25 July 2023. Further detail on the planning history is given in Section 2 of this proof of evidence.
- 1.8 The Planning Application and the Orders are now due to be considered by an Inspector, Lesley Coffey, at conjoined Public Inquiries scheduled to open on 20 February 2024. This proof of evidence has been prepared in connection with those Inquiries.
- 1.9 The purpose of my evidence is to address the LVIA and landscape design matters of the Scheme, including landscape and visual policy relevant to the Scheme; the methodology used to assess the landscape and visual impact; the mitigation measures proposed and the overall likely landscape and visual impact of the Scheme. I also address the concerns raised in objections and representations on the called-in Planning Application insofar as they relate to my area of expertise. Whilst the impacts to existing vegetation are accounted for in the landscape and visual impact assessment, I do not address specific Arboricultural matters (these are covered in Mr Maddox’s proof of evidence).
- 1.10 My proof of evidence should be read in conjunction with other separate but interrelated proofs of evidence submitted on behalf of the Council, including:
 - 1.10.1 Strategic need and benefits, Highways issues, Scheme selection and alternatives, prepared by Aron Wisdom of Oxfordshire County Council;
 - 1.10.2 Technical Highways Engineering, prepared by Andy Blanchard and Karl Chan of AECOM;
 - 1.10.3 Traffic modelling, prepared by Claudia Currie of Atkins Realis;
 - 1.10.4 The Local Transport and Connectivity Plan (LTCP), prepared by John Disley of Oxfordshire County Council;
 - 1.10.5 Environmental Impact Assessment, prepared by Alex Maddox of AECOM;
 - 1.10.6 Noise impacts, prepared by Andy Pagett of AECOM;
 - 1.10.7 Air quality, prepared by Anna Savage of AECOM;
 - 1.10.8 Climate change, prepared by Chris Landsburgh of AECOM;
 - 1.10.9 Land Assembly and Ongoing Negotiations prepared by Steve Moon of Gateley Hamer;
 - 1.10.10 Compulsory Purchase Justification prepared by Tim Mann of Oxfordshire County Council; and
 - 1.10.11 Planning matters, including the Green Belt and Very Special Circumstances case prepared by Bernard Greep of Stantec.

- 1.11 With reference to the following section of this proof which sets out the processing of the Planning Application relevant to landscape and visual matters, I was appointed to advise in relation to the Scheme in September 2021 as Landscape Lead.
- 1.12 Therefore, whilst I did not undertake the Planning Application LVIA, I have reviewed its findings and agree with its conclusions. Since the LVIA submission I have responded to queries relating to the Scheme's landscape and visual impact, including Regulation 25 Responses (see paragraphs 2.7 to 2.16 below). I attended the Planning and Regulation Committee meeting (July 2023) to respond to various landscape and visual questions as required (see paragraphs 2.19 to 2.21 below).
- 1.13 I confirm that the evidence that I have prepared in respect of the Inquiries is given in accordance with the guidance of my professional institution and I can confirm that the opinions expressed are my true and professional opinions.

2 PROCESSING OF THE PLANNING APPLICATION AS RELEVANT TO LVIA AND LANDSCAPE DESIGN

Scoping, Consultation and EIA

- 2.1 The EIA Scoping Report (April 2020) set out that the study area for the Landscape and Visual Assessment (**LVIA**), the proposed viewpoints for the visual assessment, the visualisation types, and the viewpoints for nighttime assessment would be agreed between the Applicant and the LPA prior to the preparation of the LVIA. The Scoping Opinion, consultation and responses are detailed in Tables 8.1, 8.2 and 8.3 of ES (CD A15) Chapter 8 Landscape and Visual Impact.
- 2.2 A letter was issued to the LPA's Landscape Officer on 18 August 2020 and to South Oxfordshire District Council (**SODC**) and the Vale of White Horse District Council (**VoWHDC**) on 19 August 2020 setting out the Applicant's proposed:
- LVIA study area;
 - Representative viewpoints;
 - Visualisation types for each representative viewpoint; and
 - Representative viewpoint locations to be used for the night-time assessment.
- 2.3 Details of consultation with the LPA on the Scoping Report, and SODC and VoWHDC on the contents of letter mentioned in paragraph 2.2 above, are detailed in Table 8.2 of ES (CD A15) Chapter 8 Landscape and Visual Impact. However, with reference to Tables 8.1, 8.2 and 8.3 the LVIA methodology, landscape and visual receptors was agreed with Landscape Officers at the LPA, SODC and VoWHDC.

Landscape and Visual Impact Assessment

- 2.4 The LVIA was carried out between January 2020 and September 2021 (fieldwork undertaken between January 2020 and March 2021).
- 2.5 As set out in paragraph 201 of the Planning and Regulation Committee Report, the submitted LVIA is stated to be a reasonable assessment following review by the LPA's Landscape Officer.
- 2.6 Paragraph 200 of the Committee Report states that '*The Landscape and Visual Impact Assessment (LVIA) submitted as part of the ES concludes that the introduction of the proposed development and ancillary features into the predominantly agricultural landscape would have an inevitable and significant harmful effect that could not be avoided completely through mitigation or changes in design. However, once proposed planting is established, it is anticipated that the level of harm would be reduced such that in the longer term (after fifteen years) the effects on landscape character would not be significant other than at a local level.*'

Regulation 25 Requests

- 2.7 Following submission of the planning application in November 2021, the LPA made two requests for further information under Part 5, Regulation 25 of the EIA Regulations, firstly on 26 April 2022 and secondly on 31 March 2023. Responses to these (known as EIA Regulation 25 Response documents) were submitted in November 2022 and April 2023. Alongside these response documents, two ES Addendums were submitted where the response to requests for further information necessitated changes to the ES. The chapters, figures and appendices in the ES Addendums directly replace those submitted as part of the original planning application submission in November 2021. Revised and additional text was highlighted in yellow in most cases where changes were minor, to allow the reader to clearly identify amendments. In some cases, where wider changes

were made, no highlights were provided, and the document directly replaced the previously submitted version of the document. For clarity, reference to the ES, hereafter, includes any amendments made to original ES, submitted with the planning application, through the submission of the two ES Addendums as described above.

- 2.8 Further information was requested on landscape and visual impacts, as part of the Regulation 25 Request provided on the 26 of April 2022.
- 2.9 The Revised Submission: Reg 25 (November 2022) included an ES Addendum Annex 4 Chapter 8: Landscape and Visual (CD B.1) and revised Outline Landscape and Biodiversity Management Plan (CD B.3) that addressed the additional information.
- 2.10 Annex 4 incorporated the following changes to the mitigation described:

A4130

- There are strategic linear planting blocks of trees and shrubs within the landscape design, which once established will help screen both infrastructure and traffic, particularly around the junctions.

Didcot Science Bridge

- The existing hedgerow on the north side of the A4130 Northern Perimeter Road as it passes Southmead Industrial Estate will be largely retained to maintain landscape structure and provide screening of traffic.

Didcot to Culham River Crossing

- The landscape design seeks to integrate the Scheme by planting trees, shrubs, and hedgerows alongside the road including enhancing woodland blocks to restore vegetation patterns and strengthen the landscape structure where practicable.
- Substantial areas of proposed planting are proposed, both on the River Thames bridge in the form of a sedum blanket as well as the approaches to the Appleford Railway Sidings crossing for the purposes of landscape integration and to soften the aesthetics of these structures.
- The noise barrier located on the Appleford Railway Sidings crossing will include climbing vegetation, this will help to screen this element and assimilate it into the landscape.
- Hedges, species rich grassland and grass interplanted with bulbs alongside strategic tree planting using locally characteristic species are proposed around the Abingdon Roundabout to integrate the new infrastructure.

Clifton Hampden Bypass

- The landscape design at the Culham Science Park roundabout creates a gateway feature which gradually blends into a landscape strategy which seeks to integrate the Scheme into the wider landscape.
- Trees and hedgerows are proposed alongside the road to restore vegetation patterns and strengthen the landscape structure where possible, particularly to the north of Clifton Hampden where extensive planting is proposed to reduce a perception of fragmentation of the vegetation patterns.
- The landscape design reduces potential visual intrusion of the Scheme, with substantial planting of woodland edge scrub and low-level planting at the Culham Science Park roundabout. This becomes more heavily wooded to the east as trees and shrubs are proposed to screen both infrastructure and traffic, particularly around junctions.

- Noise barriers along this part of the Scheme will include climbing vegetation on the façade that faces road users, this will help to screen these elements and assimilate them into the landscape.
- 2.11 Substantial improvements were made to the Landscape Masterplans as a consequence of the Regulation 25 Request provided by the LPA on 26 April 2022. These changes included:
- The majority of acoustic barriers will incorporate the potential for climbing vegetation.
 - At Clifton Hampden, at the far north-east of the Scheme, the bat connection corridor was enhanced across the existing watercourse, by providing additional woodland edge scrub and additional native individual trees to provide enhanced habitat connectivity north and south. The width of the proposed woodland buffer on the northwest side of the link road was increased.
 - At Culham Science Centre (CSC) roundabout, the density of the native individual tree planting was increased to provide visual screen mitigation from the link road. The amount of proposed woodland and woodland scrub has been increased to improve green connectivity.
 - At the Abingdon Road roundabout, the quantity of native individual tree planting was increased to provide additional visual mitigation for the adjacent future housing development and to reinforce the gateway road exit to Culham. To the south of the roundabout, an additional line of individual trees was included to provide visual mitigation for farm buildings to the east.
 - On the northern side of the River Thames the area of riparian vegetation was increased, and sedum blanket planting was proposed on the bridge crossing itself on the central reservation to provide some degree of greening on the bridge. It was proposed to colour the acoustic barrier/ bridge parapet green, but a colour palette from the 'North Wessex Downs Area of Outstanding Natural Beauty: Guidance' on the selection and use of colour in development will now be used.
 - At the Appleford Sidings Bridge, a sedum blanket was proposed on either side of the crossing (to be located in areas of concrete which forms the roof of the structure, either side of the road), to help soften the appearance of the structure and provide intrinsic biodiversity value.
 - Additional trees were provided at the Didcot Science Bridge to further reinforce visual mitigation on the south-west and south-east side of the structure.
 - A low growing species rich grassland seed mix, which will include flowering species and will have a maximum height of 0.5m, was proposed and will replace all former amenity grassland.
 - All proposed woodland, woodland scrub and proposed hedge locations, where feasible, were increased in size area and extents to provide additional improvements to the landscape mitigation proposals.
- 2.12 Further information was requested on topics, including Landscaping, as part of the Regulation 25 Request provided on 31 March 2023.
- 2.13 The Regulation 25 Request provided on 31 March 2023 asked for "*Further information and revised landscape drawings are required in response to concerns raised by the*

Landscape Advisor and others over the lack of planting and landscape mitigation throughout the proposal. In general, all opportunities should be taken to enhance tree, hedgerow and other planting including along highway boundaries, in areas of leftover space within the red line, and to attenuation basins wherever feasible. Where there are constraints or contextual issues that prevent further planting or that you consider should be taken into account in our assessment of the planting proposals, these should be clearly explained."

- 2.14 Marked-up landscape masterplans were provided by Atkins, working on behalf of the LPA as a landscape architect.
- 2.15 The Revised Submission: Reg 25 (April 2023) included an EIA Regulation 25 Response (CD C.2) with Appendix C being Marked Up Landscape Masterplans with Applicant Responses and Appendix D being Revised Landscape Masterplans.
- 2.16 Within this response (CD C.2) key comments made by Atkins on the Marked-up Masterplans were summarised with associated responses. Substantially more landscaping is now shown across the Scheme. It is believed that this represents the most landscaping that can be reasonably and practicably provided, and that every opportunity has now been taken to enhance tree, hedgerow and other planting including along highway boundaries and at attenuation basins.

Revised Drawings Submission, June 2023

- 2.17 The Landscape Masterplans, updated in relation to consultee comments as part of the Regulation 25 Response (CD C.2 Appendix D), formed part of the Revised Submission: June 2023 (CD D.134 to D.152).
- 2.18 None of the additional information provided in response to both Regulation 25 Requests resulted in a change to predicted significant environmental effects as reported in the ES submitted with the original planning application. This was because whilst the changes were improvements, they were assessed as remaining within the predicted tiers of landscape and visual effects.

Planning Committee, 17th-18th July 2023

- 2.19 Paragraphs 189-204 of the Planning and Regulation Committee Report July 2023 (CD F1) provided information regarding Landscape and Trees. Key extracts from this report are provided below:
 - 2.19.1 Paragraph 202 stated that *'The Landscape Advisor has reviewed the revised proposals and has stated that the amended scheme is an improvement compared to the original and has resulted in a development that is better integrated with its surroundings. The advisor has raised no objections to the amended scheme and, although there are some areas where further improvements could be made, has concluded that the proposal is now in accordance with planning policies that seek to protect and enhance the landscape.'*
 - 2.19.2 Paragraph 203 stated that *'whilst it remains the case that the development would result in the loss of some trees and other landscape features, and not all of those would be replaced, the applicant has demonstrated that all reasonable opportunities available to maximise retention and replacement planting have been taken. The applicant has also amended the proposed development to ensure that the most valuable tree features are retained'.*
 - 2.19.3 Paragraph 204 concluded that *'Subject to the recommended conditions, it is considered that the development would protect and enhance the landscape as far as is reasonably practicable given its nature and associated constraints. The applicant has demonstrated that the removal of trees as proposed is necessary to facilitate the development and is therefore sufficiently justified. Accordingly, the development is considered to be in*

accordance with national and local planning policies and the TP, which seek to protect and enhance trees and landscape feature'.

- 2.20 The Planning and Regulation Committee meeting in July 2023 addressed the impacts of the Scheme on landscape and visual amenity. There were several objectors who raised concerns regarding landscape and visual amenity. These are addressed in Section 3 of my proof of evidence.
- 2.21 The Planning and Regulation Committee Minutes July 2023 (CD F2) record that it was resolved to refuse planning permission, with one of the eight reasons for the resolution to refuse given as “*Harm to landscape*”.

Consideration of the eight reasons given in the Committee's resolution to refuse planning permission, September 2023

- 2.22 Following on from the resolution to refuse planning permission, the Director of Planning, Environment and Climate Change wrote to the Applicant on 14 September 2023 to invite a response to these reasons. The applicant responded by letter dated 19 September with attachments. This correspondence was attached as Annex 5, to the Planning and Regulation Committee Report (CD F.5).
- 2.23 In this the Applicant proposed that there are number of measures, which could be provided as part of Planning Conditions, that could be implemented to supplement the Application that are likely to potentially alleviate the landscape reason in the resolution to refuse, see below:

- **Didcot Science Bridge** - a selected number of trees could be planted on the southern verges adjacent to the alignment, on the southern side of the Didcot Railway Line, at a semi-mature size at Operation Year 1. The emphasis is to reduce the immediate magnitude of visual impact at Year 1, and therefore the resulting visual effect, from the key adjacent residents or stakeholders that are affected. Due to vegetation establishment rates, the visual effect will not be reduced at Year 15.
- **Appleford Sidings Bridge Area** - a selected number of proposed trees within the proposed woodland planting and woodland scrub mix on both the western and eastern side of the Scheme alignment could be installed at a semi-mature size at Operation Year 1. The emphasis is to reduce the immediate magnitude of visual impact at Year 1, and therefore the resulting visual effect, from the key adjacent residents or stakeholders that are affected. Due to vegetation establishment rates, the visual effect will not be reduced at Year 15.
- **Culham Science Centre Roundabout Area** - a selected number of proposed trees within the proposed woodland planting and woodland scrub mix at the eastern area could be installed at a semi-mature size at Operation Year 1. The emphasis is to reduce the immediate magnitude of visual impact at Year 1, and therefore the resulting visual effect, from the key adjacent residents or stakeholders that are affected. Due to vegetation establishment rates, the visual effect will not be reduced at Year 15.
- **Clifton Hampden Conservation Area** - a selected number of proposed trees within the proposed woodland planting and woodland scrub mix at the north and south side of the alignment could be installed at a semi-mature size at Operation Year 1. The emphasis is to reduce the immediate magnitude of visual impact at Year 1, and therefore the resulting visual effect, from the key adjacent residents or stakeholders that are affected. Due to vegetation establishment rates, the visual effect will not be reduced at Year 15.

immediate magnitude of visual impact at Year 1, and therefore the resulting visual effect, from the key adjacent residents or stakeholders that are affected; and also to establishing a Landscaping Enhancements Fund by setting aside £50,000 for the local community to apply for additional landscaping work”.

- 2.25.3 Paragraph 75 ‘Summary and Officer Recommendation’ states that *“This proposal from the applicant as set out in Annex 5 is welcomed and demonstrates that it is seeking to address landscape concerns where possible. Subject to the proposed wording of conditions to secure the additional detail now proposed by the applicant it is advised that this reason for refusal could now be resolved through the Statement of Common Ground with the applicant and not pursued thereafter at the Local Inquiry”.*
- 2.26 The Planning and Regulation Committee Minutes September 2023 (CD F6) concluded that the reason for resolution to refuse, no.6 ‘Harm to Landscape’ was resolved and *“that this proposal from the applicant as set out in Annex 5 was welcomed and demonstrated that it was seeking to address landscape concerns where possible. Subject to the proposed wording of conditions to secure the additional detail now proposed by the applicant, it was advised that this reason for refusal could now be resolved through the Statement of Common Ground with the applicant and not pursued thereafter at the Local Inquiry”.*

Processing of the Application Summary

- 2.27 From the above, the importance of landscape and visual matters has been embedded in the Scheme throughout the application process. This started with the EIA Scoping Report in April 2020, which agreed landscape and visual impact assessment matters and using the landscape and visual impact assessment process to inform the Scheme design via embedded mitigation, as set out in the ES, submitted in November 2021.
- 2.28 As part of the Regulation 25 Request in April 2022, additions to the Landscape Masterplan were made. This included new planting along the A4130, retaining existing hedgerows at the Didcot Science Bridge, additional tree planting at the Didcot to Culham River Crossing and on the noise barriers at the Clifton Hampden Bypass.
- 2.29 Further information was requested on Landscape Design in March 2023, with additional planting suggestions across the Scheme provided by the LPA’s Landscape Architect. These revised designs were submitted in June 2023 and did not require amendments to the landscape and visual impact assessment, whilst the changes were improvements, they were assessed as remaining within the predicted tiers of landscape and visual effects.
- 2.30 In the Planning Committee Report of July 2023, the Committee concluded that all reasonable opportunities to maximise retention and replacement planting have been taken and that subject to the recommended conditions, the development would protect and enhance the landscape as far as is reasonably practicable given its nature and associated constraints.
- 2.31 The Planning and Regulation Committee Minutes July 2023 record that it was resolved to refuse planning permission, with one of the eight reasons for the resolution to refuse given as “Harm to landscape”.
- 2.32 In September 2023, the Applicant’s response to the Director of Planning, Environment and Climate Change’s refusal letter there are number of measures, which could be provided as part of Planning Conditions, that could be implemented to supplement the Application that are likely to potentially alleviate the landscape reason in the resolution to refuse. These covered the Scheme as a whole, with specific focus on the Didcot Science Bridge, Appleford Sidings Bridge Area, Culham Science Centre Roundabout Area and Clifton Hampden Conservation Area.

- 2.33 With the incorporation of the above measures, the September 2023 Planning Committee concluded "Harm to Landscape" was resolved and would not be pursued thereafter at the Local Inquiry.

3 RELEVANT PLANNING POLICY

- 3.1 Policies relevant to landscape and visual matters are summarised below. Relevant Green Belt policies are included in Section 5 of this proof of evidence.

Legislative and policy framework

National Planning Policy

National Planning Policy Framework (NPPF), December 2023

- 3.2 The relevant NPPF chapters are:

- Section 9: Promoting Sustainable Transport: which encourages safe, secure, and attractive infrastructure design which responds to local character and design standards.
- Section 12: Achieving Well-Designed Places: which aims to ensure developments are visually attractive as a result of their layout and landscaping, as well as being sympathetic to local character.
- Section 15: Conserving and Enhancing the Natural Environment: which includes protecting, maintaining, and enhancing valued local environment, National Landscapes (formerly Areas of Outstanding Natural Beauty (AONB), and networks of green infrastructure.

District (Local) Planning Policy

South Oxfordshire District Council (SODC) Local Plan 2011-2035 (CD G.1)

- 3.3 The SODC Local Plan 2011-2035 adopted in December 2020 sets the vision, objectives, and policy for SODC. The following policies are relevant to LVIA and landscape design:

- Policy TRANS1b: Supporting Strategic Transport Investment and Policy TRANS3: Safeguarding of Land for Strategic Transport Schemes: which identify and support the Scheme and safeguard land for strategic highway improvements, such that the Scheme is principally within an area safeguarded for highway infrastructure.
- Policy ENV1: Landscape and Countryside: which seeks to protect the landscape and scenic beauty of the North Wessex Downs AONB and its setting. The policy requires development proposals that could affect the special qualities of an AONB (including the setting of an AONB) to prepare a LVIA.
- Policy ENV1 also seeks to protect the landscape, countryside and rural areas of South Oxfordshire from harmful development, with consideration to trees; hedgerows; irreplaceable habitats; the River Thames; other watercourses; the setting of settlements of special character; topographical features; areas of cultural and historic value; important views and skylines; and perceptual factors such as tranquillity and rarity. Supporting text for the policy states that significant weight will also be given to protecting non-designated landscapes, the countryside and green infrastructure assets from harm.
- Policy ENV8: Conservation Areas: which requires development within or in the setting of a conservation area to conserve or enhance its special interest, character, setting and appearance. This should take into account important views within, into or out of conservation areas.

- Policy ENV12: Pollution Impact of Development on Human Health, the Natural Environment and/or Local Amenity: which states that the consideration of the merits of development proposals will be balanced against the adverse impact on human health, the natural environment and/ or local amenity, including impacts of artificial light.
- Policy DES1: Delivering High Quality Development: which requires all new development to be of a high-quality design that uses land efficiently while respecting the existing landscape character and incorporating green and blue infrastructure.
- Policy DES2: Enhancing Local Character: which requires all new development to be designed to reflect the positive features that make up the character of the local area, and physically and visually enhance and complement the surroundings. This should be informed by context analysis and take account of existing local character assessments.
- Policy DES6: Residential Amenity: which states that development proposals should demonstrate that they will not result in significant adverse impacts on the amenity of neighbouring uses, with consideration to visual intrusion and external lighting.

Vale of White Horse District Council (VoWHDC) Local Plan 2031 Part 1 (CD G.2.1)

3.4 The VoWHDC Local Plan 2031 Part 1, adopted in December 2016, provides the spatial strategy and policies for VoWHDC.

3.5 The following policies are relevant to the LVIA:

- Core Policy 17: Delivery of Strategic Highway Improvements within the South-East Vale Sub-Area: which safeguards land for strategic highway improvements within the South-East Vale Sub-Area, such that the Scheme is principally within an area safeguarded for highway infrastructure.
- Core Policy 33: Promoting Sustainable Transport and Accessibility: which promotes sustainable transport and accessibility and states that *“The Council will work with Oxfordshire County Council and others to ... v.) ensure that transport improvements are designed to minimise any effects on the amenities, character and special qualities of the surrounding area, ...”*.
- Core Policy 37: Design and Local Distinctiveness: which supports design and local distinctiveness and states that *“All proposals for new development will be required to be of high-quality design”*.
- Core Policy 44: Landscape: which seeks to protect the landscape of the Vale of White Horse from harmful development, and protect trees, important views and skylines, landscape settings, and tranquillity.

VoWHDC Local Plan 2031 Part 2 (CD G.2.2)

3.6 The VoWHDC Local Plan 2031 Part 2 (Ref 8.5) adopted in October 2019 provides additional development management policies for the Vale of White Horse District. The following policies are relevant to LVIA:

- Development Policy 21: External Lighting: which sets out measures to ensure that development involving external lighting is appropriately designed and located.

- Development Policy 23: Impact of Development on Amenity: which sets out measures to minimise the impact of development on neighbouring amenity.
- Development Policy 29: Settlement Character and Gaps: which sets out measures to ensure that proposals do not compromise important gaps between settlements.

Neighbourhood Planning Policy

3.7 The Site crosses the following designated neighbourhood plan areas:

- Burcot and Clifton Hampden, which has published a pre-submission draft of a neighbourhood plan (the relevant aspects are reviewed below);
- Culham, which is a designated area, but is yet to publish a draft neighbourhood plan or draft policies; and
- Sutton Courtenay, which is a designated area, but is yet to publish a draft neighbourhood plan or draft policies.

Burcot and Clifton Hampden Neighbourhood Plan 2011-2034 (CD G.8)

3.8 The Parish of Burcot and Clifton Hampden published a pre-submission draft of their Neighbourhood Plan in November 2020. The plan is not yet adopted but will gain weight as it moves through the examination process to a referendum. The following policies are relevant to LVIA and landscape design matters and are listed for reference.

- Policy BCH6: Design Principles in Clifton Hampden: which states that development proposals will be supported, provided they sustain and enhance the distinctiveness of the village and where appropriate, the character and setting of the conservation area.
- Policy BCH9: Local Landscape Character: which states that the culturally and historically important local landscape character of the parish will be conserved and where possible enhanced.

Changes since publication

3.9 The Environment Act 2021 has now come into force. This does not alter the conclusions in the ES in respect of landscape and visual considerations.

3.10 With regards to Neighbourhood Planning Policy, there have been neighbourhood plans published since the publication of the ES. The Culham Neighbourhood Plan in March 2023 (CD G.7) and the Burcot and Clifton Hampden Neighbourhood Plan in December 2022 (CD G.8). Again, this does not alter the conclusions in the ES in respect of landscape and visual considerations.

Policy Summary

3.11 From the above, policies from National to Neighbourhood level set out the importance of the landscape, the need for high quality design measures which respects the landscape and incorporates new green infrastructure and protects the landscape from harmful development.

4 LANDSCAPE AND VISUAL IMPACT ASSESSMENT OF THE SCHEME

4.1 This section of my Proof of Evidence sets out the LVIA methodology, the relevant design measures and the predicted landscape and visual effects of the Scheme.

Methodology used to assess the landscape and visual impact

4.2 The LVIA is based on a methodology taken from:

- The Guidelines of Landscape and Visual Impact Assessment (GLVIA) 3rd Edition, published by the Landscape Institute and Institute for Environmental Management and Assessment;
- The Landscape Institute's Technical Guidance Note 02/21: Assessing landscape value outside national designations, 2021;
- Design Manual for Roads and Bridges (DMRB) LA 107 Landscape and Visual Effects (Ref 8.9), published by the Department for Transport (DfT) and National Highways (NH), which provides best practice in the assessment of landscape and visual effects for highway infrastructure; and
- DMRB LA 104 Environmental Assessment and Monitoring, published by DfT and NH which provides best practice in the assessment of environmental effects for highway infrastructure.

4.3 The LVIA follows the scope and methodology as set out in the approved Scoping Report (see para 2.1 above) and agreed with Landscape Officers at the LPA.

Landscape and Visual Baseline

4.4 The landscape baseline is set out in paragraphs 8.7.1 to 8.7.29 in the ES LVIA (CD A.15).

4.5 ES LVIA paragraphs 8.7.30-8.7.36 (CD A.15) set out designated landscapes, which in summary are that:

- As illustrated on Figure 8.8, the Site is not within any statutory designated landscapes.
- The wider study area lies partially within the North Wessex Downs National Landscape, with the far south of the study area south of Harwell being within the National Landscape, and the Wittenham Clumps in the east of the study area also within the National Landscape (refer to Figure 8.8).
- There are no non-statutory local landscape designations in the study area.
- There are several conservation areas within the study area relating principally to areas of settlement, the closest of which to the Site are Milton, Sutton Courtenay, Culham, Long Wittenham, Clifton Hampden and Nuneham Courtenay (refer to Figure 8.8).
- Only the Milton Conservation Area has a Conservation Area Appraisal (Ref 8.19). This has been reviewed in relation to the Site and there are no identified views or character management guidelines of relevance to the Site or the Scheme.

- The non-statutory Grade I listed Nuneham Courtenay registered park and garden lies across the elevated land in the north of the study area north of CSC and Clifton Hampden.
 - Whilst not a landscape designation, the part of the Site north of the River Thames lies largely within Green Belt, however, CSC, Culham Railway Station and the fields west of Culham Station are inset within the Green Belt.'
- 4.6 ES LVIA Paragraphs 8.7.45 to 8.7.90 set out the relevant published landscape character publications covering the study area, which with reference to Figures 8.9 to 8.14 are:
- Natural England, National Character Area 108;
 - Oxfordshire Wildlife and Landscape Study;
 - South Oxfordshire District Council Landscape Assessment;
 - Vale of White Horse District Council Landscape Character Assessment; and
 - North Wessex Downs Landscape Character Assessment.
- 4.7 To add a further level of landscape character detail at a more local scale proportionate to the Scheme, the LVIA identified local landscape character areas, as set out in paragraph 8.7.91 to 8.7.93.
- 4.8 ES LVIA Table 8.11 summarises the landscape receptors and their sensitivity to the Scheme.
- 4.9 The visual baseline is set out in paragraphs 8.7.94 to 8.7.151, with the location of the viewpoints illustrated on Figure 8.15. As set out above, the location of these viewpoints has been agreed with Landscape Officers. LVIA Table 8.12 summarises the visual receptors and their sensitivity to the Scheme.
- 4.10 The character of the Night Sky is set out in paragraphs 8.7.152 to 8.7.165.

Mitigation

LVIA Application

- 4.11 Design Mitigation and Enhancement Measures are described in Section 8.8 of ES (CD A.15) Chapter 8 Landscape and Visual Impact.
- 4.12 The overarching primary landscape and visual mitigation measures for the Scheme are:
- Alignment of the Scheme as a principally off-line link road between Didcot and Culham, and as a bypass to Clifton Hampden, to retain the existing local rural roads and reduce traffic through the nearby settlements of Sutton Courtenay, Appleford, Culham, Long Wittenham and Clifton Hampden, such that there is an improvement to tranquillity within the settlements;
 - Provision of new high-quality cycleway and footway which for the majority of the Scheme length are segregated, providing a new sustainable route connecting Milton Park and CSC, with connections to nearby villages and emerging/allocated housing and employment developments. The intention of the cycleway and footway is to improve connectivity, recreational opportunities and reduce severance in the landscape, whilst promoting sustainable transport; and

- Limiting the height of the proposed lighting of the new cycleway and footway to 5 metres as well as the junctions and roundabouts between the River Thames crossing to 10 metres. The lighting will use low-energy LED (light-emitting diode) lighting that has limited light spill or glare, to reduce the impact of lighting on views and the character of the night sky, as well as to respond positively to ecological matters at the River Thames crossing.
- 4.13 The following specific measures have been incorporated into the Scheme design with regard to the Didcot Science Bridge:

- The southern embankment of the Didcot Science Bridge has been designed to allow for new grassland and tree planting at the base of the embankment, that once established will reduce the perceived form of the earthworks and structure in views from Great Western Park to the south, and aid in its integration with the existing landscape features on the south side of the A4130;
- Lighting will be avoided across the high point of the Didcot Science Bridge to reduce the visual impact of lighting columns and to avoid train driver glare. Lighting will be provided up to, but not over, Network Rail land. Lighting is being proposed over the A4130 and Milton Road;
- To the south of the Great Western Railway Mainline, vegetation alongside Meadow Brook will be retained as far as practicable, with proposed enhancements to the watercourse; and
- The existing hedgerow on the north side of the A4130 Northern Perimeter Road as it passes Southmead Industrial Estate will be largely retained, with the proposed cycleway/footway constructed on the north side of the hedgerow, offline, to maintain landscape structure and provide screening of traffic. Photomontage VP04 (Figure 8.74d) and photomontage VP07 (Figure 8.75d) illustrate views of the Didcot Science Bridge with proposed mitigation planting. These are included in Appendix JA2.2.

- 4.14 The Scheme landscape masterplans are presented on Figures 8.72a to 8.72s of ES Vol II (CD A.16).

Regulation 25 Response (November 2022)

- 4.15 Within the ES Addendum Annex 4 (CD B.1) the embedded mitigation was described, and reference made to Arboricultural Impact Assessment and Tree Protection Plans (CD B.2) Sheet 2 to 7 for more detail, refer to paragraphs 2.8 above.
- 4.16 Substantial improvements were made to the Landscape Masterplans as consequence of the Regulation 25 Request provided by the LPA on 26 April 2022, refer to paragraphs 2.9 and 2.10 above.

Regulation 25 Response (April 2023)

- 4.17 The Revised Submission: Reg 25 (April 2023) included an EIA Regulation 25 Response (CD C.2) with Appendix C being Marked Up Landscape Masterplans with Applicant Responses and Appendix D being Revised Landscape Masterplans, refer to paragraphs 2.14 and 2.15 above.

Overall assessment of likely effects of the Scheme

- 4.18 The likely effects of the Scheme are as stated in paragraphs 8.9.91-8.9.95 ES (CD A.15) Chapter 8 Landscape and Visual Impact. I shall focus on the year 15 assessments, along with comparison to the year 1 effects, as the year 15 effects represent the residual

effects, e.g. accounting for the establishment of the mitigation, which is representative of the Scheme intent.

- 4.19 The design of the Didcot Science Bridge, as part of the Scheme, has been assessed for the relevant landscape and visual receptors and is therefore considered in the residual significant effects summarised below.

Landscape Effects at Completion and Operation Summer (Year 15)

Year 15 Effects at the Site Level

- 4.20 At a Site level, by year 15 the establishment of the proposed planting will aid in reducing the perception of the Scheme, associated highway infrastructure and vehicles, although the change in land use will be permanent, along with the severance to the landscape from the new road.
- 4.21 The predicted effects at year 15 are moderate adverse (significant), reducing from the predicted large adverse at year 1.

Year 15 Effects on Landscape Character Areas

- 4.22 In relation to the published landscape character areas, the establishment of the proposed planting will reduce the perception of the Scheme; although as per the impacts at the Site scale, the change in land use and new road infrastructure will be a permanent change.
- 4.23 With reference to Appendix 8.5 of the ES [CD A.17], the relatively localised scale and extent of the Scheme will not result in significant adverse effects to published landscape character areas. This includes effects upon the North Wessex Downs AONB. Refer to Appendix 8.5 of the ES for details of impact magnitudes and sensitivity.

Year 15 Effects to Local Landscape Character Areas

- 4.24 At operational year 15, the establishment of the proposed planting will result in no predicted significant adverse landscape effects to local landscape character areas. Refer to Appendix 8.5 of the ES for details of impact magnitudes and sensitivity, and resultant effects.

Summary, paragraph 8.11.9 and 8.11.10 ES (CD A15) Chapter 8 Landscape and Visual Impact.

- 4.25 At operational year 15, the establishment of the proposed planting mean that the earthworks will be better integrated into the underlying pattern of landform, the extent of vegetation loss will be mitigated, and the perception of the Scheme will reduce. Due to this, there will be no permanent significant landscape effects beyond those at the Site level, which are considered to be inevitable from the change in land use.
- 4.26 Table 4.1 summarises the significant adverse landscape effects predicted as a result of the Scheme.

Table 4.1: Summary of likely significant landscape effects at operation year 15

Receptor/	Receptor Sensitivity	Impact Description	Impact Magnitude	Residual Effect
The Site	Medium	Permanent (long-term)	Major adverse	Moderate adverse

Visual Effects at Completion and Operation Summer (Year 15)

Year 15 Effects on Visual Amenities

4.27 At operational year 15 the visible extent of the Scheme will reduce due to the retained vegetation and new planting being in leaf. The new planting will have established and be taller in height than at year 1. The magnitudes of impact (moderate to major) predicted for the year 1 assessment will reduce.

4.28 It has been assessed that there will be residual significant effects on: Views from south Appleford (Representative Viewpoint (RV) 10); Views from Thames Path National Trail (RV 18, 19, 20 and 21); Views from the entrance to Culham Science Centre (RV 27); Views from around Clifton Hampden (RV 31, 34, 36 and 37).

Summary, paragraph 8.11.15 to 8.11.17 ES (CD A15) Chapter 8 Landscape and Visual Impact.

4.29 Significant adverse visual effects are predicted at operational year 15 in views from:

- south Appleford, for recreational users of 106/4;
- the Thames Path National Trail, between approximately 0.5 km either side of the Scheme;
- the entrance to Culham Science Centre, for residents at Fullamoor; and
- around Clifton Hampden, for residents along the northern edge of the village, and users of the public right of way (PRoW) between Clifton Hampden, Culham Science Centre, and Nuneham Courtenay.

4.30 This represents a reduction in the number of significant adverse visual effects predicted during the Scheme year 1 of operation due to the Scheme landscaping becoming established and maturing. The operational year 15 effects are considered to be permanent. For each of these receptors, either the Scheme cannot be effectively screened or integrated into views by planting, or even when the proposed mitigation planting has established and matured, the planting will represent an adverse change to the view when compared to the baseline situation.

4.31 Table 4.2 summarises the significant adverse visual effects predicted as a result of the Scheme.

Table 4.2: Summary of likely significant visual effects at operation year 15

Receptor	Receptor Sensitivity	Impact Description	Impact Magnitude	Residual Effect
10 – Recreational users	Low	Permanent (long-term)	Major	Moderate adverse
18 – Recreational users	High	Permanent (long-term)	Moderate	Moderate adverse
19 – Recreational users	High	Permanent (long-term)	Major	Large adverse
20 – Recreational users	High	Permanent (long-term)	Major	Large adverse
21 – Recreational users	High	Permanent (long-term)	Moderate	Moderate adverse

Receptor	Receptor Sensitivity	Impact Description	Impact Magnitude	Residual Effect
27 – Residents	Medium	Permanent (long-term)	Major	Moderate adverse
31 – Recreational users	Medium	Permanent (long-term)	Moderate	Moderate adverse
34 – Recreational users	Medium	Permanent (long-term)	Major	Moderate adverse
36 – Recreational users	Medium	Permanent (long-term)	Moderate	Moderate adverse
36a – Residents	Medium	Permanent (long-term)	Moderate	Moderate adverse
37 – Recreational users	Medium	Permanent (long-term)	Major	Moderate adverse

Revised Design (June 2023)

- 4.32 The landscape masterplans were updated in relation to consultee comments and formed part of the Revised Submission: June 2023 (CD D.134 to D.152).
- 4.33 In these updated landscape masterplans substantial greening of the Scheme was made by changes to landscape mitigation across every part of the Scheme, as described in 2.9 above.
- 4.34 The Revised Landscape Masterplan Sheet 4 of 19 (CD D.137) shows additional individual tree planting to the southern embankments of Didcot Science Bridge (30 No. trees), over and above the species rich grass with intermittent trees originally proposed.
- 4.35 With reference to the Ecological Assessments, these changes also saw Biodiversity Net Gain figures rise from 11.11% of habitat units, 13.37% of hedgerow habitats and 1.26% linear (river) habitat units in November 2021 (see Biodiversity Net Gain (BNG) Report September 2021 [CD A.13], Section 4, paragraph 4.1.1; BNG Report October 2022 [CD B.2], Section 4; and BNG Report April 2023 [CD C.2], Section 4) to 23.13% of habitat units, 40.90% hedgerow units and 10% (or above) in linear (river) habitat units (partly secured through offsetting) in April 2023.
- 4.36 It was proposed to install noise barriers with climbing vegetation (see Regulation 25 Response (November 2022), paragraph 8.11 and Appendix Q), to agree the colour of the bridge parapet (which also acts as a noise barrier) on the eastern side of the River Thames crossing with the LPA prior to construction (see Regulation 25 Response (April 2023), paragraph 7.2, bullet point five [CD C.2]), and to provide a 3D Cellular Confinement System in an area subject to a Tree Preservation Order (TPO) located south-west of the Culham Science Centre (see Regulation 25 Response, paragraph 8.1, bullet point three) thereby avoiding impacts on the TPO trees.
- 4.37 In addition, sedum blanket was proposed to leftover areas of the Appleford Sidings bridge and the divider between traffic and footpaths on the Thames river crossing. See Sheet 9 and 12 Landscape Masterplans.

- 4.38 Information relating to tree loss can be seen in the Arboricultural Impact Assessment (AIA) which formed part of the Revised Submission: Reg 25 (November 2022) EIA Regulation 25 Response, Appendix W (CD B.2).
- 4.39 Having considered the revised design, the design changes were important and considered an improvement, however the effects were assessed to remain as stated above due to the thresholds of the effect terminologies.

LVIA Summary

- 4.40 From the above, the LVIA has been undertaken in accordance with industry guidelines and via a methodology agreed with the LPA. The LVIA has identified the existing landscape character and visual baseline and informed the Scheme design via embedded mitigation, including the retention of existing vegetation, the alignment of the Scheme and substantial new planting.
- 4.41 Accounting for the establishment of this proposed planting, at the Site level, the predicted effects at year 15 are moderate adverse (significant), reducing from the predicted large adverse at year 1. This is considered inevitable, given the nature of the Scheme and the change in land use. The pertinent matter is that the predicted effects would reduce from year 1 to year 15, due to the establishment of the proposed planting.
- 4.42 At operational year 15, the establishment of the proposed planting will also mean that the earthworks will be better integrated into the underlying pattern of landform, the extent of vegetation loss will be mitigated, and the perception of the Scheme will reduce. Due to this, there will be no permanent significant landscape effects beyond those at the Site level.
- 4.43 The visible extent of the Scheme will also reduce at year 15 due to the retained vegetation and new planting being in leaf. Therefore, the significant adverse visual effects will reduce from year 1 to year 15, with eleven visual receptors predicted to experience a significant adverse visual effect at year 15.
- 4.44 The landscape masterplans were updated in relation to consultee comments and formed part of the Revised Submission: June 2023, which included new planting across the Scheme. Having considered the revised design, the design changes were important and considered an improvement, however the effects were assessed to remain as stated above due to the thresholds of the effect terminologies.

5 GREEN BELT

- 5.1 As set out in the scope of my evidence, I have also reviewed Green Belt matters, as the concept of openness is not narrowly limited to the absence of built development but includes a visual dimension which is implicit in the purposes of Green Belt. This section of my proof of evidence should be read in combination with Mr Greep's evidence on planning matters and the Very Special Circumstances.
- 5.2 With reference to the planning application LVIA drawing Figure 8.8 Designations, the northern part of the Scheme, to the north of the River Thames covering the Clifton Hampden Bypass and the approach along the A415, along with the northern section of the Didcot to Culham River Crossing, is within the Green Belt. The Green Belt extends across South Oxfordshire and the VoWHDC.
- 5.3 The following section reviews the relevant Green Belt policy and associated assessments of the Site and concludes with a Green Belt assessment.

Policy

National Planning Policy Framework (NPPF), December 2023

- 5.4 NPPF Chapter 13 sets out policies for the protection of Green Belt land, with the stated fundamental aim of the policies to prevent urban sprawl by keeping land permanently open.
- 5.5 NPPF paragraph 143 states the five purposes of the Green Belt:
- a) *“to check the unrestricted sprawl of large built-up areas;*
 - b) *to prevent neighbouring towns merging into one another;*
 - c) *to assist in safeguarding the countryside from encroachment;*
 - d) *to preserve the setting and special character of historic towns; and*
 - e) *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*
- 5.6 NPPF paragraph 147 sets out that where it is necessary to release Green Belt land for development, consideration should be given to land which is well-served by public transport, and improvements to the environmental quality and accessibility of remaining Green Belt land.
- 5.7 NPPF paragraph 148 includes for Green Belt boundaries being clearly defined, using physical features that are readily recognisable and likely to be permanent.
- 5.8 NPPF paragraph 150 states:
- “Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”*
- 5.9 NPPF paragraph 153 states:
- “When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”*

National Guidance, Green Belt, 2019

- 5.10 Matters of relevance in assessing the impact of a proposal on the openness of the Green Belt include:

“openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume.”

- 5.11 Stated improvements to the environmental quality and accessibility of the Green Belt include:

- *“new or enhanced green infrastructure;*
- *woodland planting;*
- *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
- *improvements to biodiversity, habitat connectivity and natural capital;*
- *new or enhanced walking and cycle routes; and*
- *improved access to new, enhanced or existing recreational and playing field provision.”*

South Oxfordshire Local Plan 2035

- 5.12 Policy STRAT6: Green Belt sets out that the Green Belt will be protected from harmful development so as to ensure it continues to serve its key functions. The policy also sets out that development (beyond that permitted by the NPPF) will require very special circumstances and new development should be carefully designed to minimise its visual impact.

VoWHDC Local Plan 2031

- 5.13 Core Policy 13 The Oxford Green Belt similarly sets out that the Green Belt will be protected to maintain its openness and permanence and that very special circumstances will be required for inappropriate development.

Published Green Belt Assessments

- 5.14 With reference to ‘The Green Belt Assessment of Strategic Sites in South Oxfordshire’ report, dated December 2018, the Scheme is located in Broad Area 8.

- 5.15 The published study concludes that Broad Area 8 (which covers Culham) makes:

- no contribution to NPPF Green Belt purpose a;
- a low contribution to NPPF Green Belt purpose b and d; and
- high contributions to NPPF Green Belt purpose c.

- 5.16 ‘The Green Belt Assessment of Strategic Sites in South Oxfordshire’ report, dated December 2018, states in relation to Parcel 8 (relevant to the HIF1 Scheme route) that the harm to the Green Belt resulting from the allocations coming forward will be low-moderate, to moderate-high, but that circumstances exist to justify such harm.

- 5.17 With reference to the ‘Local Green Belt Study for South Oxfordshire District Council’ (2015) the Scheme is in Land Parcel 3 (Areas A, B and C).

- 5.18 The published study concludes that Land Parcel 3 makes:

- no contribution to NPPF Green Belt purpose a; and
- a contribution to NPPF Green Belt purposes b, c and d.

5.19 The VoWHDC Green Belt Review (2014) does not cover the Scheme extent.

Relevant Design Matters

5.20 The HIF1 Scheme areas affected include:

- Didcot to Culham River Crossing (RIV), Thames Crossing to Culham Roundabout (west of Culham Rail station)
- Clifton Hampden Bypass (CHB), Clifton Hampden east of the secondary Culham Science Centre road entrance.

5.21 The following list summarises the key design features of the Scheme within the Green Belt:

- Thames Crossing Bridge- including parapets, the noise barrier green wall, and the support columns;
- The embankments going northbound after the Thames Crossing Bridge and attenuation pond features;
- Cycleways, footways and the HIF1 Scheme between Thames Crossing and Culham Roundabout;
- Culham Roundabout and all attenuation pond features;
- Culham Science Centre Roundabout; and
- Clifton Hampden Bypass - the area east of the second Culham Science Centre road entrance to the end of scheme in east, including the attenuation ponds and SuDs.

Didcot to Culham River Crossing (RIV)

5.22 The Didcot to Culham River Crossing (RIV) is one of the four elements that makes up the HIF1 Scheme. This part of the Scheme comprises of a new single carriageway link between the A4130, to the north of Didcot, and the A415 Abingdon Road. The proposed location of the RIV element is shown in Figure 5.1 below.



Figure 5.1 Didcot to Culham River Crossing Location Plan

- 5.23 Extending north from Sutton Courtenay roundabout, a 336m viaduct is provided to cross the River Thames floodplain with a 65m single span bridge over the River Thames, south bank to north bank. There will be two 45-metre side spans, one on the south bank of the River Thames as the last viaduct span before the bridge, and one on the north bank of the River Thames, before the road continues on embankment northwards. There will be dedicated, off-carriageway, two-way cycle track and footway facilities located adjacent to

the southbound lane on the bridge. The River Thames is navigable at this location so the bridge height above water level has been designed to accommodate river traffic.

- 5.24 The crossing over the River Thames will be a single carriageway, with:
- Paved width: 9.3m wide inclusive of 3.65m traffic lanes and 1.0m hard strips;
 - Raised verge: 2.0m wide on the east side and 0.6m on the west side;
 - Cycleway: 3.0m wide on the east side; and
 - Footway: 2.0m wide on the east side.
- 5.25 For the general arrangement layout of the Didcot to Culham River Crossing refer to CD D.7 to D.15.
- 5.26 For further details refer to 'Scheme Design' section of Mr Chan's proof of evidence.

Clifton Hampden Bypass (CHB)

- 5.27 The Clifton Hampden Bypass (CHB) is one of the four elements that makes up the HIF1 Scheme. This part of the Scheme will provide a new single carriageway link between the A415 Abingdon Road to the west of Clifton Hampden, B4016 Oxford Road, to the north of the village. The proposed location of the CHB element is shown in Figure 5.2 below.

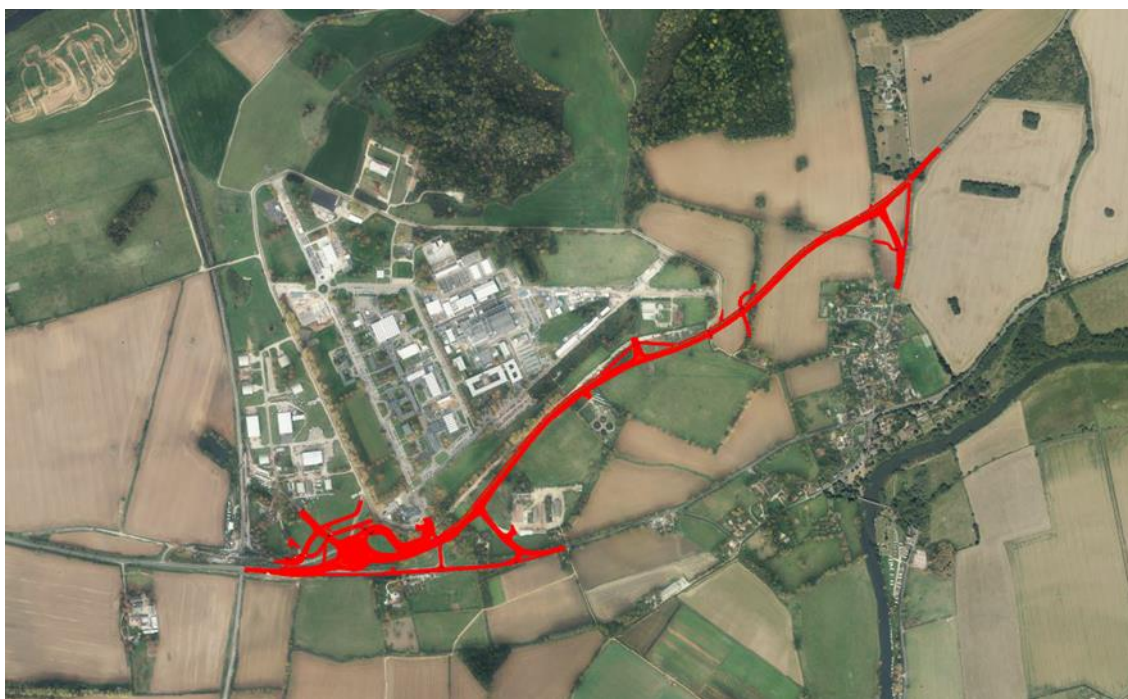


Figure 5.2 Clifton Hampden Bypass Location Plan

- 5.28 For the general arrangement layout of the Clifton Hampden Bypass refer to CD D.16 to D.19.
- 5.29 For further details refer to 'Scheme Design' section of Mr Chan's proof of evidence.

Likely Impact to the Green Belt

- 5.30 From the above, the Scheme would evidently result in new structures within the Green Belt and therefore a reduction in the physical openness of the existing Green Belt in comparison to undeveloped fields.

- 5.31 I consider that the Scheme would respond positively to the guidance for the Green Belt through new woodland planting and the proposed landscape design, such that the pertinent matter is the predicted effects at year 15, to account for the proposed mitigation.
- 5.32 As set out in the landscape assessment the Scheme would result in significant effects for two local landscape character areas (LLCAs), and the Site, within the Green Belt. At year 15 these would relate to the Site only. See Table 5.1 below.

Table 5.1: Summary of likely landscape effects within the Green Belt, during construction and operation

Receptor	Receptor Sensitivity	Construction Landscape Effect	Operational Year 1 Landscape Effect	Operational Year 15 Landscape Effect
Natural England National Character Areas				
NCA 108 Upper Thames Clay Vales	Medium	Slight adverse	Neutral	Neutral
Oxfordshire Wildlife and Landscape Study LCAs				
LCA WH/1 Lower River Thames	Medium	Slight adverse	Slight adverse	Slight adverse
LCA WH/14 Clifton Hampden	Low	Slight adverse	Slight adverse	Slight adverse
LCA WH/15 Nuneham Courtenay	Medium	Slight adverse	Slight adverse	Neutral
LCA CR/15 Nuneham Courtenay	High	Neutral	Neutral	Neutral
South Oxfordshire Landscape Assessment and LCAs				
LCA 2 Nuneham Courtenay	Medium	Slight adverse	Slight adverse	Slight adverse
AECOM defined Local Landscape Character Areas LLCAs				
The Site	Medium	Large adverse (significant)	Large adverse (significant)	Moderate adverse (significant)
LLCA 7 River Settlements	High	Neutral	Neutral	Neutral
LLCA 12 Thames Floodplain	Medium	Moderate adverse (significant)	Moderate adverse (significant)	Slight adverse
LLCA 13 Culham Farmland	Low	Slight adverse	Slight adverse	Slight adverse

LLCA Clifton Hampden	15	High	Slight adverse	Slight beneficial	Slight beneficial
LLCA Clifton Hampden Farmland	16	Medium	Large adverse (significant)	Moderate adverse (significant)	Slight adverse
LLCA Nuneham Wooded Parkland	17	High	Neutral	Neutral	Neutral

5.33 In respect of the visual effects, the following receptors would have views of the Scheme within Green Belt (RV 16 to 40, 47 and 48 refer to CD A.16.20 ES Figure 8.15 Viewpoint Locations). As set out in Table 5.2 below, these receptors are predicted to experience effects ranging between neutral to large adverse at year 15, with nine being significant.

Table 5.2: Summary of likely landscape effects within the Green Belt, during construction and operation

Receptor	Receptor Sensitivity	Construction Landscape Effect	Operational Year 1 Landscape Effect	Operational Year 15 Landscape Effect
RV 16	Medium	Moderate adverse (significant)	Slight adverse	Slight adverse
RV 17	High	Neutral	Neutral	Neutral
RV 18	High	Large adverse (significant)	Moderate adverse (significant)	Moderate adverse (significant)
RV 19	High	Very large adverse (significant)	Very large adverse (significant)	Large adverse (significant)
RV 20	High	Very large adverse (significant)	Very large adverse (significant)	Large adverse (significant)
RV 21	High	Large adverse (significant)	Moderate adverse (significant)	Moderate adverse (significant)
RV 22	High	Neutral	Neutral	Neutral
RV 23	Low	Moderate adverse (significant)	Slight adverse	Slight adverse
RV 24	Low	Moderate adverse (significant)	Slight adverse	Slight adverse
RV 25	Medium	Slight adverse	Slight adverse	Slight adverse

RV 26	Low	Moderate adverse (significant)	Slight adverse	Slight adverse
RV 27	Medium	Large adverse (significant)	Moderate adverse (significant)	Moderate adverse (significant)
RV 28	Low	Moderate adverse (significant)	Slight adverse	Slight adverse
RV 29	Low	Slight adverse	Neutral	Neutral
RV 30	Medium	Neutral	Neutral	Neutral
RV 31	Medium	Large adverse (significant)	Large adverse (significant)	Moderate adverse (significant)
RV 32	Medium	Large adverse (significant)	Moderate adverse (significant)	Slight adverse
RV 33	Medium	Neutral	Neutral	Neutral
RV 34	Medium	Large adverse (significant)	Large adverse (significant)	Moderate adverse (significant)
RV 35	Medium	Neutral	Neutral	Neutral
RV 36	Medium	Large adverse (significant)	Large adverse (significant)	Moderate adverse (significant)
RV 37	Medium	Large adverse (significant)	Large adverse (significant)	Moderate adverse (significant)
RV 38	Medium	Large adverse (significant)	Large adverse (significant)	Slight adverse
RV 39	Medium	Neutral	Neutral	Neutral
RV 40	Medium	Neutral	Neutral	Neutral
RV 47	High	Slight Adverse	Slight adverse	Slight adverse
RV 48	Very High	Slight Adverse	Slight adverse	Slight adverse

5.34 In respect of the NPPF Green Belt purpose a, the Scheme is not located in a part of the Green Belt where there are large built-up areas. Therefore, the Scheme would not impact the function of the Green Belt to check the unrestricted sprawl of large built-up areas. This reflects the published study, which concludes that Broad Areas 6 and 8 do not contribute to this Green Belt purpose.

5.35 In respect of NPPF Green Belt purpose b, the Scheme is not located in a part of the Green Belt where there are neighbouring towns, as the settlement patterns consists of

villages. Therefore, the Scheme would not impact the function of the Green Belt in preventing neighbouring towns from merging.

- 5.36 The Scheme would be located in a part of the Green Belt which is countryside and would result in a reduction in physical openness, as well as visual effects. Therefore, the Scheme would result in moderate harm to NPPF Green Belt purpose c.
- 5.37 The Scheme is not located in proximity to historic towns, however there are views from Clifton Hampden Conservation Area, (RV 32, 33 and 36), and therefore there would be a low level of harm to NPPF Green Belt purpose d.
- 5.38 The Scheme would not impact NPPF Green Belt purpose e.

Green Belt Summary

- 5.39 Therefore, whilst there would be harm to the Green Belt in respect of landscape and visual matters in respect of NPPF purposes b, c and d, this harm would be localised, to a relatively small part of the overall extent of the Green Belt. The level of harm in respect of NPPF Green Belt purposes would range between low and moderate.
- 5.40 As set out in Mr. Greep's proof of evidence, the HIF1 Scheme is, however, a key piece of transport infrastructure that is critical to the delivery of the growth requirements set out within the adopted SODC Local Plan and the adopted VOWH Local Plan, and most of the route is 'safeguarded land' in the Green Belt that has been earmarked for this specific development.
- 5.41 In conclusion, the safeguarded route has been tested at the examinations of both Local Plans, and therefore the principle of some harm to the Green Belt to accommodate the HIF1 Scheme in this location is firmly established and supported within adopted development plan policy.

6 RESPONSE TO OBJECTIONS AND REPRESENTATIONS

- 6.1 The following section provides responses to objections raised by a number of parties including Rule 6 parties, interested parties with individual call-in representations and objections to the Orders.

Rule 6 parties

Neighbouring Joint Parish Councils Committee (CD L.6)(December 2023)

- 6.2 This representation raises criticism of the landscape and visual impact assessment, pages 22-29 of the Joint Committee's Statement of Case.
- 6.3 The Joint Committee (JC) referred to an expert report on Landscape and Green Belt (page 22) produced by the JC, which it states is '*highly critical of the ES Landscape and Visual Appraisal (LVIA)*'. I would not agree with the suggestion that the '*assessment of the landscape impacts of the scheme is "disingenuous"*' (page 22). Paragraph 201 of the Planning and Regulation Committee Report stated that '*the submitted LVIA is a reasonable assessment following review by the Council's Landscape Assessment*'. Refer to paragraph 2.5 of this Proof of Evidence.
- 6.4 I do not agree with the suggestion that there is an '*apparent acceptance*' (page 22) of significant adverse effects on local residents of the elevated section of the scheme at Appleford Sidings. The LVIA concluded that there will be residual significant adverse landscape and visual effects. Refer to paragraphs 4.18 to 4.31 of this Proof of Evidence, which summarises the likely residual significant effects, including reference to Appleford, Thames Path National Trail and Clifton Hampden (as referred to on page 23 of this representation).
- 6.5 Page 24 of the representation stated that '*the professional officers from both local authorities set out a number of concerns that remain*' in relation to tree and hedge planting. I would not agree with this suggestion, as stated in Planning and Regulation Committee Reports and Minutes (July 2023 and September 2023), refer to paragraphs 2.19 to 2.21 and 2.25 and 2.26 of this Proof of Evidence.
- 6.6 Page 25 of the representation referred to the landscape impact grounds for rejection of the application. The Planning and Regulation Committee Minutes September 2023 (CD F6) concluded that the reason for the resolution to refuse, no.6 'Harm to Landscape' was resolved, refer to paragraph 2.26 of this Proof of Evidence.
- 6.7 The representation refers to Landscape Impact (pages 25 to 29). I do not agree with the suggestions made and refer to paragraph 2.5 of this Proof of Evidence which stated that '*the submitted LVIA is a reasonable assessment following review by the Council's Landscape Assessment*'.
- 6.8 On page 26 of this representation reference is made to WebTAG, and an appraisal undertaken in 2018. This proof of evidence relates solely to the LVIA submitted as part of the Planning Application process. The methodology for the assessment was agreed at EIA Scoping stage (refer to paragraph 2.1 to 2.3 above). Also, WebTAG guidance states that WebTAG be used for transport appraisals for business cases rather than environmental impact assessments.
- 6.9 With reference to 'Major impacts on specific sections' on page 27 of this representation:
- 6.9.1 *Views from Thames Path National Trail (ES LVIA (CD A.15) paragraph 8.9.100 and 8.9.101).* At operational year 15 it is assessed that RV 18, 19, 20 and 21 will experience potential residual significant effects, ranging from moderate to large adverse.
- 6.9.2 *Views from around Clifton Hampden (ES LVIA (CD A.15) paragraph 8.9.103 to 8.9.110).* At operational year 15 it is assessed that RV 31, 34, 36 and 37 will experience moderate adverse (significant) effects.

- 6.9.3 *Viaduct at gravel lakes.* It is understood that this relates to the area north west of Appleford, where the Scheme crosses the Thames. There are no residual significant visual effects assessed as whilst it is understood that access paths may be created in future, following completion of the Scheme, there is currently no public access to this area.
- 6.9.4 *Appleford Sidings, Views from South Appleford. (ES LVIA (CD A.15) paragraph 8.9.98 and 8.9.99).* At operational year 15 it is assessed that RV 10 will experience moderate adverse (significant) effect.
- 6.10 Refer to paragraphs 4.18 to 4.31 of this proof of evidence which summarises likely residual significant landscape and visual effects of the Scheme.
- 6.11 With reference to 'tree loss and planting design' on page 28 of this representation, I do not agree with the suggestion made that '*DC landscape officers are highly critical of the schemes planting proposals*' and refer to paragraph 2.19 of this proof of evidence. The response to the reason for resolution to refuse, no.6 'Harm to Landscape', described in paragraphs 2.22 to 2.26 of this proof, resulted in the proposed reason for refusal being resolved.
- 6.12 The Planning and Regulation Committee Minutes September 2023 (CD F6) concluded that the reason for resolution to refuse, no.6 'Harm to Landscape' was resolved and "*that this proposal from the applicant as set out in Annex 5 was welcomed and demonstrated that it was seeking to address landscape concerns where possible. Subject to the proposed wording of conditions to secure the additional detail now proposed by the applicant, it was advised that this reason for refusal could now be resolved through the Statement of Common Ground with the applicant and not pursued thereafter at the Local Inquiry*".

Call-in representations

Adrian Wear (3 October 2023) (CD N22)

- 6.13 This representation raised criticism of landscape and visual impact in 'Greenbelt'.
- 6.14 I do not agree with the suggestion that the mitigation measures are inadequate, as stated in paragraphs relating to 'Damage to the Greenbelt' of this representation. As described in paragraphs 2.7 to 2.18 of my Proof of Evidence, substantial improvements have been made to the landscape mitigation as part of the Scheme in response to Regulation 25 Requests and updated Landscape Masterplans were included as Appendix D of the Revised Submission, June 2023.
- 6.15 This is supported by paragraphs 189-204 of the Planning and Regulation Committee Report July 2023 (CD F1), and Paragraphs 73-76 of the Planning and Regulation Committee Report September 2023 (CD F5), as detailed in paragraphs 2.19 and 2.25 of this proof of evidence.
- 6.16 The assessment of landscape and visual effects does support the representation's suggestion that significant adverse landscape and visual effects would remain at operation year 15, although I disagree that this is the case '*in the main part*'.
- 6.17 Within the SODC Green Belt designation, the LVIA predicted that there will be residual significant landscape effects at a Site level and residual significant visual effects at nine Representative Viewpoints (RV 18 to 21, 27, 31, 34, 36 and 37). Residual significant effects are summarised in Section 4, paragraphs 4.18 to 4.31, of this Proof of Evidence.
- 6.18 As set out in Section 8.3 of the ES LVIA (CD A.15) an assessment of the Scheme in relation to Green Belt policy is set out in the Planning Statement (as submitted with the planning application). Matters relating to Green Belt are covered in section 5 of this proof and Mr Greep's proof of evidence.

- 6.19 Other concerns including those related to alternative options, health impact assessments, air quality, noise, and climate change are dealt with in the respective proofs of evidence on these matters.

Greg O'Broin, Appleford Parish Council (3 October 2023) (CD N.21)

- 6.20 Appleford Parish Council referred to the eight reasons for the resolution to refuse outlined at the Planning and Regulation Committee meeting held in July 2023. Responses in relation to health impact assessment, climate change, noise, and design are covered by other relevant proofs of evidence.
- 6.21 Paragraph 2.6 of this representation stated that “*harm to Landscape at Appleford, Clifton Hampden where the landscape outlook will be changed with the loss of 283 tree features (incl. 169 mature trees, 98 tree groups, a third (35%) of hedgerows and two woodlands). In addition, over 300 acres will be lost to the natural environment. Visual impact and harm to the wetlands and riparian environment with potential flood impact at the Thames crossing or upstream*”. It is acknowledged in ES Chapter 8: Landscape and Visual Impacts (see the summary in Table 8.13 and 8.14) that there will be remaining significant effects on the landscape and visual amenity. Given the size and scale of the Scheme, it would be very difficult to fully mitigate all adverse landscape and visual impacts of the Scheme. Landscape planting has been increased substantially since the original submission to address concerns of relevant stakeholders. As outlined in Mr Maddox's proof of evidence, there will be tree losses across the site, however, due to replacement tree planting, within 10 years, trees canopy cover will extend across 12.05% to 16.74% of the land within the Scheme boundary; the current baseline tree canopy cover within the Scheme boundary is approximately 14%.
- 6.22 Matters relating to Green Belt are covered in section 5 of this proof and Mr Greep's proof of evidence.

Oxfordshire Roads Action Alliance (ORAA) (4 October 2023) (CD N.26)

- 6.23 Paragraph 9 of the ORAA representation stated that there will be a negative impact on the landscape, significant tree canopy loss and refers to the Appleford Sidings Bridge. It is acknowledged in ES Chapter 8: Landscape and Visual Impacts (see the summary in Table 8.13) that there will be remaining significant effects on the landscape and visual amenity. Given the size and scale of the Scheme, it would be very difficult to fully mitigate all adverse landscape and visual impacts of the Scheme. Landscape planting has been increased substantially since the original submission to address concerns of relevant stakeholders. Accordingly, the Scheme is estimated to achieve 23.13% of habitat units, 40.90% hedgerow units and 10% (or above) in linear (river) habitat units (partly secured through offsetting) (see Biodiversity Net Gain Report April 2023 [CD C.2]; Appendix R of Regulation 25 Response November 2022). Furthermore, the Scheme complies with the trading rules for area and hedgerow habitats, meaning that these habitats will be replaced with habitats that are the like-for-like or better.
- 6.24 The construction of the Appleford Sidings bridge will require the loss of trees in this area, see Tree Protection Plan Sheets 22 and 25 in the Appendix W: Revised Arboricultural Impact Assessment of Regulation 25 Response (November 2022) [CD B.2], which shows trees to retained and removed at the location of the Appleford Sidings. It is acknowledged that there will be tree losses across the site, however, compensatory planting has been included to reduce the overall loss. An Arboricultural Impact Assessment Addendum (April 2023) was submitted in Appendix H of Regulation 25 Response (April 2023) [CD C.2] following updates to the landscape planting proposals. This sets out in Table 2: Summary of Canopy Cover Impacts that the amount of tree canopy lost will be 121,336 m². Replacement tree planting, with 10 years of canopy growth at 500 mm annual growth, will result in a canopy of 169,749 m², as a percentage of the land within the Scheme boundary - this is 16.74%. At a lower growth factor of 250 mm annual growth over 10 years, canopy cover would be 96,751 m² which is 12.05% of the land within the Scheme boundary. Therefore, tree canopy cover across the Scheme, after 10 years, will be between 12.05% and 16.74% of the land within the Scheme boundary. For context, the

current baseline tree canopy cover within the Scheme boundary is approximately 14% (see paragraph 4.1.7 of the Arboricultural Impact Assessment Addendum (April 2023)). It should be noted that the Applicant has a set of Tree Policies, Policy 22 states that on strategic developments the Applicant will seek to achieve 30% tree canopy cover after 10 years, within the public domain. In their report to the July 2023 Planning and Regulation Committee, LPA officers confirmed that these policies are not a statutory document but are a material consideration in the determination of the Planning Application (see paragraph 190). Officers also state in paragraph 198 that whilst the Scheme does not achieve 30% canopy cover after 10 years, as required by the policy, compensatory planting could be undertaken off-site on land under the control of the Applicant.

Chris Church, Oxford Friends of the Earth (3 October 2023) (CD N.24)

- 6.25 Oxford Friends of the Earth referred to the eight reasons for the resolution to refuse outlined at the Planning and Regulation Committee meeting held in July 2023. Responses in relation to Health Impact Assessment, flooding implications, climate change, noise and design are covered by the other relevant proofs of evidence.
- 6.26 Matters relating to landscape harm and loss of trees, as referred to in paragraph 2.6 of this representation, are covered in paragraphs 6.20 to 6.21 of this proof of evidence.
- 6.27 Matters relating to Green Belt are covered in section 5 of this proof and the Planning Proof of Evidence.

Vicky Johnson (28 September 2023) (CD N.8)

- 6.28 This representation referred to noise and air quality impacts on residents in Appleford, climate change and Health Impact Assessment - these matters are dealt with by the other relevant proofs of evidence..
- 6.29 On page 1 of this representation, Vicky Johnson stated that *“the proposed flyover associated with this planned road at Appleford will cause irreparable damage in the form of not only a negative visual impact...”*. Visual impacts will be experienced by residents located at the southern end of Appleford. For the majority of the village, views towards the Scheme will be screened by existing intervening vegetation. ES Figure 8.77b and 8.77d: VP14 – View west from an open location at Appleford Recreation Ground shows how the Scheme (illustrated by a redline outline of the Scheme) would be screened by existing vegetation.

Victoria Shepard (3 October 2023) (CD N.23)

- 6.30 This representation referred to the eight reasons for the resolution to refuse outlined at the Planning and Regulation Committee meeting held in July 2023. Responses in relation to alternative options, flooding implications, Health Impact Assessment, climate change, noise, and design are covered by other relevant proofs of evidence.
- 6.31 Matters relating to landscape harm and loss of trees, as referred to in paragraph 6 of this representation, are covered in in paragraphs 5.20 and 5.21 of this proof of evidence.
- 6.32 Matters relating to Green Belt are covered in section 5 of this proof and Mr Greep’s proof of evidence.

Jacqueline Mason (letter from Thrings LLP dated 20 September 2023) (CD. N.3)

- 6.33 Jaqueline Mason’s representation referred to ‘Noise and Landscaping’ (page 2) in relation to Fullamoor Farmhouse. The landscape planting proposed to the north of Fullamoor Farmhouse was increased in density due to concerns raised about the lack of landscape planting at the Culham Science Centre roundabout. Immediately north of Fullamoor Farmhouse, additional native species hedgerow, individual trees and woodland edge/ scrub planting were proposed on land between Fullamoor Farmhouse and the Scheme. A comparison can be drawn by reviewing Appendix V of Regulation 25

Response (November 2022) Preliminary Landscape Masterplan Sheet 16 of 19 and Appendix D of Regulation 25 Response (April 2023) Preliminary Landscape Masterplan Sheet 16 of 19, which is the latest submitted landscape design for that area.

- 6.34 This representation also discusses impacts of the HIF 1 Scheme on the Grade II Listed Fullamoor Farmhouse. This is dealt with by Gillian Scott's Technical Note appended to Mr Greep's proof of evidence. This objection also discusses the impact of noise on the amenity of the property. This matter is dealt with in Mr Pagett's proof of evidence.

Objections to the Orders

Mr and Mrs Aries (17 February 2023) (CD J.2)

- 6.35 This objection stated that *'we will be one of three properties surrounded by traffic on all four sides...would be put in the unenviable position of having the A415 to our front, the proposed bypass to our rear, the farm access on one side and another new road on the fourth side - the proposed A415 connection. This will deny us any privacy, putting us on full display for passing traffic'*.
- 6.36 As reported in the overall assessment of likely effects of the Scheme (paragraphs 4.18 to 4.31 of this proof), at operational year 15, there will be residual significant visual effects on Representative Viewpoints on the A415 at the location of the new roundabout at Culham Science Centre and in relation to the A415 Clifton Hampden bypass.
- 6.37 Representative Viewpoint (RV) 29, road users of the A415, best represents North Cottage, and the baseline description describes that residential properties north and south of the road in this location are enclosed by vegetation such that they do not have views of the Site. Although RV29 will experience a slight adverse visual effect during construction, this reduces to a neutral effect at operational year 1 and year 15.

Sutton Courtenay Parish Council (7 March 2023) (CD J.10)

- 6.38 This objection referred to *'Site 13. The design of the new River Thames bridge and the flyover requirements'*, and stated that this *'will have an adverse impact on the landscape of the area'*.
- 6.39 The landscape assessment resulted in no residual adverse effects to published landscape character areas due to the relatively localised scale and extent of the Scheme.
- 6.40 As reported in the overall assessment of likely effects of the Scheme (paragraphs 4.18 to 4.31 of this proof of evidence), at operational year 15, the establishment of the proposed planting mean that the earthworks will be better integrated into the underlying pattern of landform, the extent of vegetation loss will be mitigated, and the perception of the Scheme will reduce. Due to this, there will be no permanent significant landscape effects beyond those at the Site level, which are considered to be inevitable from the change in land use.
- 6.41 These significant landscape effects at a Site level, assessed to be moderate adverse, will be relevant to the location of the new River Thames bridge due to the introduction of new highway infrastructure and vehicles, permanent change in land use along with severance to the landscape from the new, elevated, road.
- 6.42 The proposed planting around the bridge embankment have established at operation year 15, however it is acknowledged that in relation to the high and medium sensitivity of the recreational receptors, the residual visual effects will range between large adverse (significant) and moderate adverse (significant).

7 SUMMARY PROOF OF EVIDENCE AND CONCLUSIONS

- 7.1 Landscape and visual matters have been embedded in the Scheme throughout the application process. This started with the EIA Scoping Reprint in April 2020, which agreed landscape and visual impact assessment matters and using the landscape and visual impact assessment process to inform the Scheme design.
- 7.2 The importance of this approach to landscape and visual matters is due to the importance of the landscape, high quality design measures protecting the landscape from harmful development as set out in national to local plan policy.
- 7.3 The Landscape and Visual Impact Assessment was undertaken in accordance with industry guidelines and via a methodology agreed with the LPA. The LVIA has identified the existing landscape character and visual baseline and informed the Scheme design via embedded mitigation, including the retention of existing vegetation, the alignment of the Scheme and substantial new planting.
- 7.4 The landscape design has been an iterative process with the LPA, including additional planting suggestions across the Scheme provided by the LPA's Landscape Architect in March 2023. The extent of the landscape planting represents the most landscaping that can be reasonably and practicably provided, and that every opportunity has been taken to enhance tree, hedgerow and other planting including along highway boundaries.
- 7.5 Accounting for the establishment of this proposed planting, at the Site level, the predicted effects at year 15 are moderate adverse (significant), reducing from the predicted large adverse at year 1. This is considered inevitable, given the nature of the Scheme and the change in land use. The pertinent matter is that the predicted effects would reduce from year 1 to year 15, due to the establishment of the proposed planting.
- 7.6 At operational year 15, the establishment of the proposed planting will also mean that the earthworks will be better integrated into the underlying pattern of landform, the extent of vegetation loss will be mitigated, and the perception of the Scheme will reduce. Due to this, there will be no permanent significant landscape effects beyond those at the Site level.
- 7.7 The visible extent of the Scheme will also reduce at year 15 due to the retained vegetation and new planting being in leaf. Therefore, the significant adverse visual effects will reduce from year 1 to year 15, with eleven visual receptors predicted to experience a significant adverse visual effect at year 15.
- 7.8 Part of the Scheme is within the Green Belt and the Scheme would result in a reduction in physical and visual openness. In respect of landscape and visual matters and NPPF Green Belt purposes b, c and d, this harm would be localised, to a relatively small part of the overall extent of the Green Belt. The level of harm in respect of NPPF Green Belt purposes would range between low and moderate.
- 7.9 The HIF1 Scheme is, however, a key piece of transport infrastructure that is critical to the delivery of the growth requirements set out within the adopted SODC Local Plan and the adopted VOWH Local Plan, and most of the route is 'safeguarded land' in the Green Belt that has been earmarked for this specific development.
- 7.10 The safeguarded route has been tested at the examinations of both Local Plans, and therefore the principle of some harm to the Green Belt to accommodate the HIF1 Scheme in this location is firmly established and supported within adopted development plan policy.
- 7.11 With the incorporation of the above measures, the September 2023 Planning Committee concluded that the reason for resolution to refuse no.6 "Harm to Landscape" was resolved and would not be pursued thereafter at the Local Inquiry.

8 STATEMENT OF TRUTH AND DECLARATION

- 8.1 I confirm that, insofar, as the facts stated in my proof evidence are within my own knowledge, I have made clear what they are and I believe them to be true and that the opinion I have expressed represent my true and complete professional opinion.
- 8.2 I confirm that my proof of evidence includes all facts that I regard as being relevant to the opinions that I have expressed and that attention is drawn to any matter which would affect the validity of those opinions.
- 8.3 I confirm that my duty to the Inquiry as an expert witness overrides any duty to those instructing or paying me, and I have understood this duty and complied with it in giving my evidence impartially and objectively, and I will continue to comply with that duty as required.
- 8.4 I confirm that, in preparing this proof of evidence, I have assumed that same duty that would apply to me when giving my expert opinion in a court of law under oath or affirmation. I confirm that this duty overrides any duty to those instructing or pay me, and I have understood this duty and complied with it in giving my evidence impartially and objectively, and I will continue to comply with that duty as required.
- 8.5 I confirm that I have no conflicts of interest of any kind other than those already disclosed in this proof of evidence.

JANE ELIZABETH ASH

30 January 2024