

**Opening Statement for Cholsey Parish Council, Crowmarsh Parish Council and  
Wallingford Town Council, 15<sup>th</sup> July 2025**

**Appeal Reference: APP/U3100/W/25/3361505**

**Planning Application Reference: MW.0115/21**

**Appellant: London Rock Supplies Ltd**

**Site: Land at White Cross Farm, Wallingford, Oxfordshire**

**Proposal: “Extraction and processing of sand and gravel including the construction of new site access roads, landscaping and screening bunds, minerals washing plant and other associated infrastructure with restoration to agriculture and nature conservation areas, using inert fill”**

1 I am Beryl Guiver. I hold a Bachelor of Science degree in Geography and a Master of Science degree in Environmental Management and Technology from Oxford Brookes University. I hold a Diploma in Town Planning and I am a Member of the Royal Town Planning Institute. I am representing Cholsey, Crowmarsh and Wallingford Parish and Town Councils.

2 I will set out relevant policies of the development plan for this area. Whilst the Oxfordshire Mineral and Waste Core Strategy is now 8 years old, many policies are still relevant. The South Oxfordshire Local Plan 2035 and the Cholsey Neighbourhood Plan Review are recently adopted plans and still carry full weight in accordance with the NPPF paras 12 and 48. In assessing whether a proposal is sustainable development I will highlight that the development plan must be read as a whole and regard must be had to the delivery potential and likely achievements over the lifetimes of the plans. I will set out that individual policies which may appear to support a proposal cannot be cherry picked and read in isolation from the whole development plan strategy. Neither is it relevant just to look back at the historic or current position in relation to delivery, it is important to look forward to what plans will achieve.

3 Planning practice guidance is clear that the planning system should focus on whether the development itself is an acceptable use of land and the impacts of that use. (Minerals para 12).

4 The appeal site lies in an area at the highest risk of flooding. I will highlight that Planning Practice Guidance sets out that the flood risk sequential test should be carried out for proposals in such areas. The aim of the sequential approach is to ensure that areas with little or no risk of flooding are developed in preference to areas at higher risk. Even where a risk assessment shows the development can be made safe without increasing risk elsewhere the sequential test still needs to be satisfied. This steers development to the lowest risk areas. (PPG Flood Risk para 23).

**Effectively, even though minerals development is water compatible the sequential test needs to be carried out and followed.** (Para 27 NPPF footnote 63?) So, it is only when there are no reasonably available sites in low and medium risk areas that high-risk areas should be considered.

5 I will show that the sequential test has not been properly carried out and that the potential of other sites in minerals consultation areas in South Oxfordshire to contribute to the 7 year supply has not been considered. It is only after the sequential test at the Oxfordshire level has been carried out that a sequential approach to the development of the individual site should be followed. Evidence for the sequential test does not appear to be available.

6 In relation to the detailed impacts of the proposal I will weigh the benefits against the many harms that are likely to arise, in particular in relation to:

- The important landscape of the Chilterns and its setting
- The environment of the River Thames
- The environment of the Thames National Trail
- The biodiversity of the site, part of the Thames Wallingford to Goring Conservation Target Area, a Priority Habitat and a key area for the draft Oxfordshire Local Nature Recovery Strategy.
- The Natural Flood Management services provided by the site
- The health of children attending Elizabeth House

7 We will argue that:

- a) This is a floodplain meadow that is regularly inundated with deep fast flowing water. The increased flood risk potential of this proposal has been underestimated particularly in the longer term. It will seriously risk polluting the River Thames and irreversibly altering the local hydrology.

- b) The proposal will harm this valued landscape part of the setting of the nationally important Chilterns Landscape for the medium term, at least six years.
- c) The proposal will harm the local biodiversity of this important and valuable greenspace for 10 to 15 years. The impact on the soil will be long term and likely irreversible.
- d) The Thames Path is a much-loved walking and running route for thousands of people. The tranquillity of these fields will be destroyed by the gravel pit for at least six years.
- e) The potential impacts on the children's nursery at Elizabeth house have not been properly explored. Children are far more sensitive to pollution than adults, treating the site as a residential property is inappropriate and may result in young children being exposed to unacceptable risks. The proposal may also put the nursery business at risk.

8 CCWs view is that these impacts are likely to be substantial and significant and have been underestimated by the appellants.

9 We believe there are other less harmful options available to supply our future sand and gravel needs. The small contribution this site makes to the regional gravel supply simply does not justify these irreversible or long-term environmental harms.

10 The land is far more valuable in terms of natural capital for carbon and flood water storage, and for biodiversity as floodplain grazing marsh habitat, than it is for gravel. CCW wants to protect this beautiful and tranquil stretch of riverside that's important to our community and to the thousands who walk the Thames Path each year.

10 There is a gravel pit almost next door to this site and the community understands the value and impact of this type of development. I will argue that the harms we will set out outweigh the suggested benefits of adding a very limited increase in the sand and gravel supply position and the other limited biodiversity gains proposed in the site restoration. This is simply the wrong place for gravel extraction, and **the proposal should be refused.**