

LITTLE TEW – REVIEW OF OBJECTION COMMENTS
LEAD PROFESSIONAL(S) RESPONSES – 28 OCTOBER 2024

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REPRESENTATION ON BEHALF OF THE LITTLE TEW CONSERVATION GROUP – John Steel KC, 39 Essex Chambers				
1	P4	Previous refusal is a material consideration	The decision of the Council on the 2022 planning application (for the construction of a country house and gardens with stable courtyard, new highway accesses, drainage works and landscape proposals including a new lake, all on the same site Ref 22/01785/FUL) is a material consideration in the determination of the current application. A decision on a subsequent application should be followed by the decision maker on matters of planning policy and principle unless there are sound planning reasons the contrary.	SW
2	P6	Scheme is essentially the same as previous, other than the detailed architectural design	It is the detailed architectural design only that has changed in 2024, the basic design parameters including form has not changed. This is not surprising as the architect, Francis Terry and Associates, is the same in both cases. It is axiomatic that if the principles of a development remain the same, but it is merely the detailed design of a building by the same architect which changes in a resubmission by way of a new planning application, decisions concerning planning policy which relate to matters of principle should remain the same unless external factors change materially, such as planning policy or factors affecting the area surrounding the building. In respect of changed principles, there are none.	FT Between 2022 and 2024 the proposed design has been substantially developed with the input from the Design Review Panel. The 2022 submission was for a fairly generic Georgian design, which would have been inoffensive, but which was not specific to the location. The 2024 design is very specific to the County of Oxfordshire in its choice of decorative details, but also in the fundamentals of its plan. A genuinely baroque/classical approach has been adopted, with a clear visual hierarchy and a sequence of dramatic architectural spaces. The current design is therefore a serious essay in the classical style, with much more substance than the one submitted in 2022.
3	P8	Location of new dwelling is unsustainable – absence of need for a new dwelling	The decision of the Council in 2022 was that there would be an adverse impact upon the setting of the Little Tew Conservation Area which would not be offset by public benefits in the form of, firstly, the provision of a new dwelling and, secondly, biodiversity benefits. The first benefit previously placed in the balance, namely the provision of a new dwelling, is of no material weight given the unsustainability of the location for a new dwelling and the absence of need for a new dwelling. The sustainability of the village of Little Tew and of the site itself weighs strongly against the proposal. Permission should be refused on sustainability grounds unless in the planning balance there are clear and convincing reasons for permitting a dwellinghouse in the proposed location.	SW MR The comment relates to sustainability in purely need and biodiversity limitations only and thus does not itself meet the intent of the NPPF framework definition that includes social, economic and environmental benefits. The proposal has measurable, sustainable public benefit derived from the uplift in knowledge and technical detailing through the delivery of a complex building meeting the Passive House standard – the only data proven energy saving standard. The learning from which will benefit both local residents in historic properties subject to increasing energy prices (10% just in October 24 alone) and high carbon emissions polluting the air locally, and more widely the

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				country houses of the UK by showcasing the weight behind the art of the possible. The UK's Climate Change Committee (CCC) says residential retrofits need to increase to a rate of 500,000 per year by 2025, and one million per year by 2030 to meet the UK's net zero target. Becoming a beacon for learning would more than benefit local properties through increased energy savings and house values if the learning were to be enacted in practice. Thus offering significant benefit/material weight.
4	P9	Impact upon biodiversity is not a benefit in the planning balance – following Bioscan site survey	Bioscan who, after a survey of the site in September 2024 at the time of a joint site visit with the applicant's biodiversity consultants, reached totally different conclusions to those of the applicant's consultants Windrush Ecology. As set out in the Bioscan report, the impact upon biodiversity is not a benefit to be placed in the balance but a detriment and one which is a significant detriment of substantial weight as being contrary to policy both national and local level.	TB The Biodiversity Net Gain (BNG) Assessment (of which there are now three iterations following Bioscan's survey and comments) shows that there will be a significant net gain in biodiversity as a result of the proposals. The net gain is being driven by the substantial habitat creation and enhancement that is included within the proposals, particularly with regard to landscaping, habitat creation and habitat enhancement. Further net gains in biodiversity are likely to be delivered through the installation of bat and bird boxes, for example, that can be delivered through an Ecological Enhancement Plan as a condition to the planning consent. In addition, there will also be a condition for a Habitat Management and Maintenance Plan (HMMP) which will be needed for the delivery and management of the proposed habitats moving into the future (to cover the 30 year period over which BNG will function). The Statutory BNG Metric is a tool by which net gains can be quantified. The greater than +10% uplift in the biodiversity value of the

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				site is driven through the retention and enhancement of grassland habitats, the creation of grassland habitats (from former arable land), creation of woodland, parkland and a lake, as well as the creation and enhancement of hedgerows. The removal of arable cultivation alone is likely to result in a significant ecological enhancement. The BNG Metric was first run in April 2024, with the result of +78.48% net gain in habitats (+66.37 Habitat Units) and +17.40% net gain in hedgerows (+10.26 Hedgerow Units). There was a minor error in that Metric, in that on-site (red line) and off-site (blue line) habitats were not separated as they should have been. This has now been corrected (in October 2024), with the result of +649.48% net gain in habitats (+65.28 Habitat Units) and +75.82% net gain in hedgerows (+4.72 Hedgerow Units). In light of the field survey data gathered by Bioscan in September 2024, the Metric was re-run using Bioscan's new habitat baseline, with the result of +470.81% net gain in habitats (+87.49 Habitat Units); result for hedgerows remains unchanged. It is clear from the above that wherever you chose to take your baseline, the proposals will deliver a significant uplift in biodiversity value.
5	P9	Harm to the setting of the Conservation Area	The proposal would cause heritage harm contrary to policy. In the circumstances, there are no planning benefits to outweigh the 'less than substantial harm' which would be caused to the setting of the Conservation Area, a heritage asset, recognised in planning policy in the Local Plan and Little Tew Conservation Area Character Appraisal to be required by policy to be conserved and enhanced.	NW The proposals will not affect the character or appearance of the conservation area; the site lies some distance beyond the boundary of the conservation area. Whilst not a statutory duty under s72 of the 1990 Act, the National Planning Policy Framework explains that the contribution that the setting makes to the significance of a designated heritage asset and therefore the impact of a development on that contribution must be assessed and is a

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				material consideration in decision making. The setting of the conservation area is described in the Council's conservation area appraisal as one that is, 'tucked away', 'within its cupped landform' 'cloaked by a folded landform' with a 'sense of enclosure' (pages 2,7). The heritage report (para 1.11, 10.7, 11.5 – 11.7, pages 42 – 44) explains how this setting can be experienced in views. This setting is not experienced in views from the application site, which sits in the wider agricultural context around the village. Whether or not the application site is within the setting of a designated heritage asset, which it is considered it is not, the heritage report accompanying the application has undertaken a comprehensive analysis of any impact the proposed development would have on the character or appearance of the conservation area and people's experience and understanding of its special interest. This has demonstrated that the introduction of a large, detached house set in its own designed parkland and gardens with a range of ancillary buildings would be entirely consistent with the long tradition of country house building (that para 84 of the NPPF seeks to sustain) and that is a familiar component of the surrounding area (see Appendix 3 in WA report). The proposals do require a rural location, are appropriate and are sensitive to the defining characteristics of the area. The intent and opportunity to add to the rich heritage of rural areas is set out in PPG7: Countryside, which introduced this exceptions policy, stating <i>This means that each generation would have the opportunity to add to the tradition of the Country House which has done so much to enhance the English countryside. (emphasis added)</i>
6	P9	Contrary to national and local plan policy	The site and proposed development are unsustainable and thereby contrary to national policy and Local Plan Policy OSI, OS2, H2, T1 and T2.	SW MR OSI - Presumption in favour of sustainable development. The sustainability of the proposal is met clearly against the WODC KPI's. The potential for increased learning from

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				inclusion of the PH standard has capacity to benefit not just local residents in historic properties but the public more widely in the capture and sharing of knowledge across the construction industry. OS2 - Locating development in the right places – policy linked to policy OS3 below. OS3 - Prudent use of natural resources – met through the increase in land opportunity for biodiversity gains (section 5), minimising use of energy, on-site energy generation (reducing impact on the grid locally), maximising solar gain etc (Appendix 4), use of materials (section 8) of ES Report H2 - Delivery of New Homes - Only residential development of exceptional quality or innovative design; T1 – Sustainable transport – the site maximises opportunities for cycling and includes both a home office and electric charging point in line with the policy guidance (section 6) T2 – Highway improvements schemes – safe access Separate transportation issues response may be needed
7	P10	Site is not isolated within the meaning of Para 84	...isolation is not to be considered in relation to individual buildings alone but also should have regard to the functional and physical form of a settlement. The settlement of little Tew is considered by those who live within Little Tew to extend to include Quarry Barn. The fact that the LPA has concluded that there is an impact upon the setting of the Little Tew Conservation Area is of itself strong evidence that the location of the application site or proposed dwelling is not isolated within the meaning of NPPF para 84.	SW
8	P10	Site area for change should be all within blue line	The area which will be the subject of the area of change as a consequence of and unarguably an integral part of the development proposals includes the land within the blue line on	SW

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			the Site Location Plan LA/09, which arguably should be within the red line area in any event.	
9	PI0	Site is 30m approx. from houses on Meetings Road	This area is clearly not isolated from the settlement of Little Tew, but merely a few meters away from the houses on the Meetings Road which are part of the village (at most 30m).	SW
10	PI1	Development site is not “isolated”	The red line is merely 215m away from Rylands Cottage which is considered to be the north-western edge of the settlement of Little Tew by Counsel acting for the owner of the land and the applicant in 2022 (ref para 15 of the Opinion of Stephen Whale of Counsel of Landmark Chambers, in support of the application). I agree with his assessment and conclusion on this point of the extent of the village, but not with his conclusions that the development would be isolated within the meaning of NPPF 84. It is ‘outside’ the settlement, in ‘open countryside’, on a bare agricultural field, but certainly not isolated.	SW
11	PI1	Contrary to LP Policy OS2	The application proposals do not require a rural location, are not appropriate for a rural location, and do not respect the intrinsic character of the area. None of the criteria are met and the proposals are therefore contrary to Local Plan Policy OS2.	SW
12	PI1/12	Contrary to Policy H2	if the proposal does not comply with policy OS2, it cannot comply with policy H2 even if one of the exceptions in H2 applies and is met, again contrary to the contentions made below in relation to the design.	SW
13	PI2	NPPF Policy for isolated dwellings	The policy exceptions for isolated dwellings only as exceptions to normal policy against such development has been in NPPF since its first edition published in 2012. The purpose of the restrictive policy is to ensure that settlements in rural areas are not able to be expanded by new houses being developed on the edge of villages, including along the roads leading out from villages, to avoid ribbon development, and to avoid development creep outside villages on opportune unplanned greenfield sites which might become available. In other words, to avoid and prevent by planning policy precisely what is being proposed here. The proposal is clearly contrary to national and Development Plan policy.	SW
14	PI3	Para 139 cannot be	Para-139 is relied on by the applicant and states as follows....	ML The applicant does not rely upon NPPF Para 139 –

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		used as substitute for Para 84	If a site which by reason of its location is unacceptable in accordance with Local Plan policy and does not accord with NPPF paragraph 84, para 139 cannot take its place to cause the development to be acceptable.	which is completely separate from fulfilling the criteria of NPPF Para 84e.
15	PI3/14	No material difference between the applications	there is no material difference in the design considerations between the two applications relating to matters of principle. The differences lie in the differences of detailed design of the main house, a matter of no material difference in terms of the principles applying to development of the site.	FT The 2024 design has been substantially developed in terms of its consideration and incorporation of Passivhaus technology. The adoption of such features as stone faced dormers and large casement style windows with triple glazing has made the house innovative and changed its aesthetic considerably. The elimination of conventional fireplaces and the use of ventilation stacks instead of chimneys was encouraged by the design review panel.
16	PI4	All aspects of the scheme must be appropriate and acceptable	the landscape design, layout of the buildings, driveway, gardens and the siting, scale, massing, form and any other factors of relevance to the design of the built development in its proposed location. If any one of these principles is considered inappropriate and unacceptable for the location, it is highly unlikely that the design as a whole can be considered acceptable, let alone outstanding.	FT The proposed location of the house with respect to the road is the most logical one on the site. The relationship with the proposed parkland view draws on the English landscape tradition which naturally creates vistas from the house and reciprocal views of it. The layout is therefore appropriate to a house of this nature and to the proposed landscape type.
17	PI4	In principle, this scheme is not materially different – therefore should be refused	It was concluded by the Local Planning Authority and its officers in 2022 that the proposal by reason of its nature, siting, scale, massing, design and form would fail to represent a development which is truly outstanding, inadequately reflecting the highest standards in architecture, nor helping to raise standards of design more generally in rural areas. The same conclusion is to be reached in relation to the 2024 proposed design which, although different in matters of detail, is not materially different in matters of principle.	SW
18	PI5	No public benefits of significant or material weight	where there is less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits proposal. There is no part of the proposals that enhances or better reveals the significance of heritage assets, none that preserve elements of Conservation Area or its setting. There are no other public benefits relating to historic value and, as stated below, no others of any material weight. Where there are no public benefits of significant weight to weigh	SW

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			in the balance but only substantial planning harm, it is to be expected that the decision should be to refuse planning permission.	
19	PI7	Harm to SSSI	The evidence submitted both in the hydrological report of Water Resource Associates (WRA) and also the ecology and biodiversity report of Bioscan shows that there are clear risks of harm to the SSSI from the development either during construction but also subsequently after development has been constructed through use of the dwelling house, land and lake for domestic and other purposes.	TB There will be no direct impacts on the SSSI during construction or operation. All potential indirect impacts will be mitigated. The proposed building and hardstanding areas will have negligible impact on groundwater flows, as the soils are quite impermeable at this location. The proposed development will affect approximately 0.61% of the River Dorn's catchment area and therefore have a negligible impact on flow rates. A surface water drainage strategy has been submitted with the planning application providing information for the proposed Sustainable Drainage Systems (SUDS) and flow control measures. The proposals will control surface water from the proposed development, mimicking pre-development conditions. Furthermore, the proposed SUDS will treat surface water from the site before discharging into the river. A construction environmental management plan (CEMP) will be submitted prior to construction, via a planning condition, including temporary measures for managing and treating run-off from the site during construction. There is sufficient space on site to provide Sustainable Drainage Systems for collection of silt and contaminants and for controlling the surface water from the site. The surface water drainage strategy states that gravel surfaces will form the access road and several paths, allowing water to infiltrate into the ground and mimicking natural conditions. The proposed building will be constructed in an

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				area where Whitby Mudstone forms the bedrock geology. This stratum has a very low permeability and therefore its contribution to the catchment is more by surface water than baseflow. The surface water from the new building will mimic existing conditions. The proposed SuDS and flow control device will further treat and regulate the flows from this area. The proposed lake will be lined and will not be in contact with the groundwater. The foul water from the development will be directed through a sewerage treatment system. Treated water will discharge into a proposed drainage field where it will infiltrate into the ground. An overflow from the drainage field will direct any excess clean, treated water to the lake where it will be further diluted. The claim by Bioscan that this type of sewage treatment system is “notorious for periodic failures” is not backed by any evidence. No embankments or other above ground retaining structures are proposed for the lake. The lake will be constructed below the existing ground level. Therefore, the risk of a breach is low. An overflow can be provided to mitigate the risk of overtopping. Details will be provided in the detail design and can be shared with the LPA. A planning condition for the development’s drainage proposals is expected for this development.
20	P17	BNG is incorrect and if +10% not met, scheme should be refused	The Bioscan Report also demonstrates that the claim of an excess over the requirement for a Biodiversity Net Gain +10% is not made out. Further, there has been degradation and therefore the baseline is not the existing position but must be set with the level at the time before degradation took place, namely in 2017/18, which would further increase the net gain required to meet policy and legal requirements. If the BNG + 10% level is not	TB The Biodiversity Net Gain (BNG) Assessment shows that there will be a significant net gain in biodiversity as a result of the proposals. The net gain is being driven by the substantial habitat creation and enhancement that is included within the proposals.

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			met, this is of itself a reason for refusal of planning permission.	The Statutory BNG Metric is a tool by which net gains can be quantified. The greater than +10% uplift in the biodiversity value of the site is driven through the retention and enhancement of grassland habitats, the creation of grassland habitats (from former arable land), creation of woodland, parkland and a lake, as well as the creation and enhancement of hedgerows. The removal of arable cultivation alone is likely to result in a significant ecological enhancement. The BNG Metric was first run in April 2024, with the result of +78.48% net gain in habitats (+66.37 Habitat Units) and +17.40% net gain in hedgerows (+10.26 Hedgerow Units). There was a minor error in that Metric, in that on-site (red line) and off-site (blue line) habitats were not separated as they should have been. This has now been corrected (in October 2024), with the result of +649.48% net gain in habitats (+65.28 Habitat Units) and +75.82% net gain in hedgerows (+4.72 Hedgerow Units). In light of the field survey data gathered by Bioscan in September 2024, the Metric was re-run using Bioscan's new habitat baseline, with the result of +470.81% net gain in habitats (+87.49 Habitat Units); result for hedgerows remains unchanged. There has been no degradation of habitats since the site was first surveyed in 2020. Agricultural practices that were undertaken prior to the current landowner purchasing the two southern fields (i.e. prior to October 2018) has no relevance to the planning application, or to the BNG calculation. The Government's rules and guidelines regarding what date

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				to use when determining the ecological baseline for Biodiversity Net Gain Assessments is quite clear. It states that the date used to calculate the on-site pre-development biodiversity value should be “the date of the application; or a proposed earlier date. If the applicant proposes an earlier date, they must provide a reason for this. This earlier proposed date cannot be a date which is before the day on which Schedule 7A came into force in relation to the development.” For the application site, this date is 12th February 2024. The date of the Biodiversity Net Gain Assessment (Windrush Ecology, 2024) for the application site is 17th April 2024. The Government rules go on to state that “Surveys of the development site to calculate the pre-development biodiversity value of the on-site habitat should ideally be done shortly before the submission of the planning application, to ensure.....the pre-development biodiversity value is accurate. Older surveys can be used where there has been no material change in the on-site habitat when the planning application is submitted.” The application site was first surveyed by Windrush Ecology in July 2020. Surveys in 2021 and 2024 have confirmed that there has been no “material change in the on-site habitat” since that date. The surveys undertaken by Windrush Ecology and Bioscan clearly show that there has been no degradation in grassland (or other) habitats since the first habitat survey was undertaken in July 2020, and the current land manager has confirmed that no fertiliser has been used within these two fields since the current owner took ownership in October 2018 (south-western field) and October 2019 (south-eastern field). No unauthorised degradation of the on-site habitat has taken place between 30th January 2020 and 2nd April 2024.

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21	P20	Impact on SSSI and River Dorn protected species and habitats	there is no consideration of the cumulative impact of the proposed development on the SSSI, River Dorn, protected species and habitats when considered together with the development of the proposed development Application 24/01521/FUL also proposed above the same SSSI. It is incumbent on the Local Planning Authority to consider potential cumulative impacts – see NPPF 186(b). As the BNG + 10% requirement is not met and, as concluded by WRA in combination with Bioscan, that the proposed development represents a significant risk to the SSSI both during the construction and operational phases, it would be contrary to policy to grant planning permission.	TB There will be no direct impacts on the SSSI during construction or operation. All potential indirect impacts will be mitigated. The proposed building and hardstanding areas will have negligible impact on groundwater flows, as the soils are quite impermeable at this location. The proposed development will affect approximately 0.61% of the River Dorn's catchment area and therefore have a negligible impact on flow rates. A surface water drainage strategy has been submitted with the planning application providing information for the proposed Sustainable Drainage Systems (SUDS) and flow control measures. The proposals will control surface water from the proposed development, mimicking pre-development conditions. Furthermore, the proposed SUDS will treat surface water from the site before discharging into the river. A construction environmental management plan (CEMP) will be submitted prior to construction, via a planning condition, including temporary measures for managing and treating run-off from the site during construction. There is sufficient space on site to provide Sustainable Drainage Systems for collection of silt and contaminants and for controlling the surface water from the site. The surface water drainage strategy states that gravel surfaces will form the access road and several paths, allowing water to infiltrate into the ground and mimicking natural conditions. The proposed building will be constructed in an area where Whitby Mudstone forms the bedrock geology. This stratum has a very low permeability and therefore its contribution to the catchment is more by surface water than

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				baseflow. The surface water from the new building will mimic existing conditions. The proposed SuDS and flow control device will further treat and regulate the flows from this area. The foul water from the development will be directed through a sewerage treatment system. Treated water will discharge into a proposed drainage field where it will infiltrate into the ground. An overflow from the drainage field will direct any excess clean, treated water to the lake where it will be further diluted. No embankments or other above ground retaining structures are proposed for the lake. The lake will be constructed below the existing ground level. Therefore, the risk of a breach is low. An overflow can be provided to mitigate the risk of overtopping. Details will be provided in the detail design and can be shared with the LPA. A planning condition for the development's drainage proposals is expected for this development. The BNG Metric was first run in April 2024, with the result of +78.48% net gain in habitats (+66.37 Habitat Units) and +17.40% net gain in hedgerows (+10.26 Hedgerow Units). There was a minor error in that Metric, in that on-site (red line) and off-site (blue line) habitats were not separated as they should have been. This has now been corrected (in October 2024), with the result of +649.48% net gain in habitats (+65.28 Habitat Units) and +75.82% net gain in hedgerows (+4.72 Hedgerow Units). In light of the field survey data gathered by Bioscan in September 2024, the Metric was re-run using Bioscan's new habitat baseline, with the result of +470.81% net gain in habitats (+87.49 Habitat Units); result for hedgerows remains unchanged.

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22	P20/21	Information missing from application	Further, substantial information is clearly absent from the application in order to satisfy the basic requirements which the local planning authority would require in order to be in a position to be able to take all relevant matters into account before determining whether to grant planning permission, Where, as here, there are detailed expert reports submitted by an objector, the standard of reasons required to be given if their conclusions are not accepted by an Local Planning Authority is higher than in the case of non-expert reports. This is as is required by law - see <i>Watton v Cornwall Council</i> [2023] EWHC 2436 (Admin).	SW
23	P21	Harm and irreversible harm to SSSI	If on the evidence available the development outside a SSSI is likely to have an adverse effect on it, planning permission should be refused. If there is insufficient evidence to reach a positive conclusion that harm will not occur and over time harm is likely to be irreversible, planning permission should also be refused applying the precautionary principle.	TB There will be no direct impacts on the SSSI during construction or operation. All potential indirect impacts will be mitigated. The proposed building and hardstanding areas will have negligible impact on groundwater flows, as the soils are quite impermeable at this location. The proposed development will affect approximately 0.61% of the River Dorn's catchment area and therefore have a negligible impact on flow rates. A surface water drainage strategy has been submitted with the planning application providing information for the proposed Sustainable Drainage Systems (SUDS) and flow control measures. The proposals will control surface water from the proposed development, mimicking pre-development conditions. Furthermore, the proposed SUDS will treat surface water from the site before discharging into the river. A construction environmental management plan (CEMP) will be submitted prior to construction, via a planning condition, including temporary measures for managing and treating run-off from the site during construction. There is sufficient space on site to provide Sustainable Drainage Systems for collection

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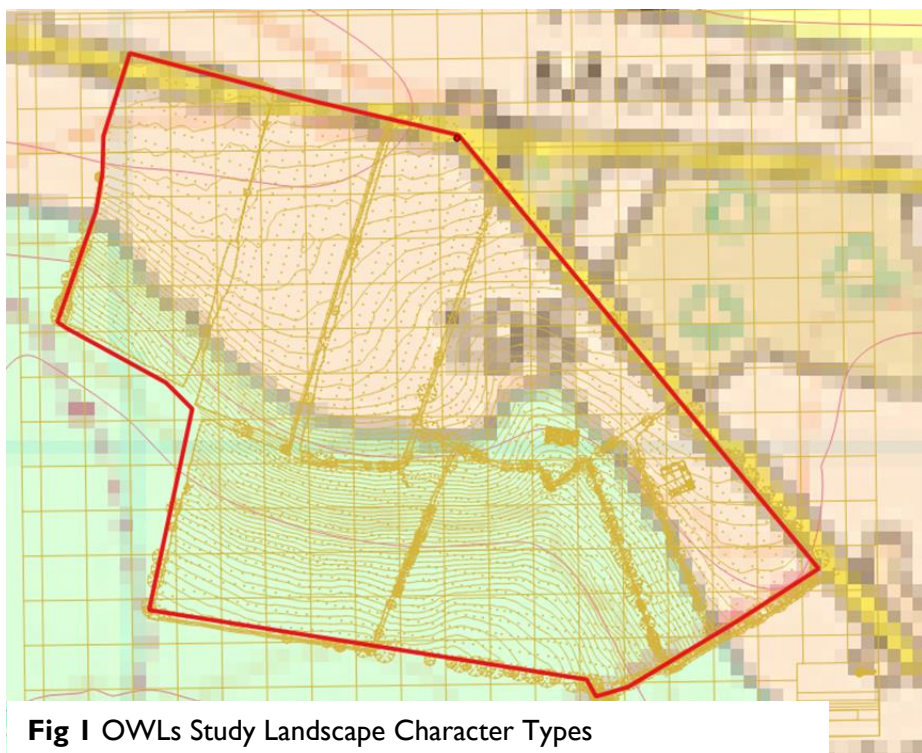
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				of silt and contaminants and for controlling the surface water from the site. The surface water drainage strategy states that gravel surfaces will form the access road and several paths, allowing water to infiltrate into the ground and mimicking natural conditions. The proposed building will be constructed in an area where Whitby Mudstone forms the bedrock geology. This stratum has a very low permeability and therefore its contribution to the catchment is more by surface water than baseflow. The surface water from the new building will mimic existing conditions. The proposed SuDS and flow control device will further treat and regulate the flows from this area. The foul water from the development will be directed through a sewerage treatment system. Treated water will discharge into a proposed drainage field where it will infiltrate into the ground. An overflow from the drainage field will direct any excess clean, treated water to the lake where it will be further diluted. No embankments or other above ground retaining structures are proposed for the lake. The lake will be constructed below the existing ground level. Therefore, the risk of a breach is low. An overflow can be provided to mitigate the risk of overtopping. Details will be provided in the detail design and can be shared with the LPA. A planning condition for the development's drainage proposals is expected for this development.
24	P22/23	Harm to openness of landscape and views across Dorn Valley	the landscape of the plateau on which the proposed development would sit would be transformed from the currently open spacious landscape of the plateau to a wooded landscape with substantial woodland planting on the ridge as well as surrounding the proposed development. The proposed house would sit prominently at the highest point on the ridge within funnel emphasising its existence and grandeur.	CB Far from sitting on a ridge (which is along the line of the main road to the north of the application site), the contours clearly show that the house is sited on the steeper and lower part of the slope, off the plateau. As shown below, the main house is within the 'Woodland Pastures Valleys and Slopes' Character Area Type (green

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			The landscape design is in stark contrast and indeed contradiction to the landscape strategy and recommendations of the LVIA. This is not Parkland and Estate landscape character, which applies to the historic Great Tew landscape and is in contrast to it. These dissimilar character areas of open farmland, some of which like the application site continue to be owned by the Great Tew estate, are of landscape and historic importance as they enhance the historic character of the Parkland landscape by reason of their juxtaposition and contrasting character to that of the Parkland. The openness of the landscape in views in particular from across the Dorn Valley is one of its important landscape features and qualities. That would be materially altered and harmed as described above.	shading) (OWLS), while the stables is on the interface between the Woodland Valley Slope and the Open Farmland Plateau (yellow shading). In limiting tree planting to sparse individual trees within the flatter landscape to the north, the scheme meets the landscape strategy for this landscape type set out in 5.2.2 of the LVIA and maintains the open nature of the type. Similarly, the landscape scheme strengthens the characteristics of the ‘Wooded Pastures valleys and Slopes’ types and contributes to the strategy for this type set out in 5.2.2 of the LVIA, introducing a mosaic of grassland and trees, strengthening the tree cover in the hedges and planting wet woodland type trees on the lower slopes and around the proposed lake. The proposed woodland planting on the southern slope is also consistent with the character described for the West Oxfordshire Landscape Character Type ‘Semi-enclosed limestone wolds’ set out in 5.2.3 if the LVIA with a key characteristic of the type stated as ‘some visual containment provided by large blocks and belts of woodland creating a semi-enclosed character.’ Section 9.6 of the LVIA, along with the visualizations set out in the appendices demonstrate that intervisibility between the site and the surrounding landscape is very limited to a small number of locations close to the site on the southern slopes. This is detailed within the assessment. The intervisibility is limited largely due to intervening field boundaries with tall trees. The landscaping scheme seeks to maintain natural views and the visualisations in appendices 3 and 4 show the (limited) views of the house to be partially screened by existing trees at year 1 and fully screened by both existing and proposed trees at maturity. (Figs 1&2 on next page)
25	P24	Precedent	The Local Planning Authority will find it difficult to distinguish	SW

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			some of the characteristics of this development from others, in particular in relation to its location outside Little Tew, but also from similar circumstances concerning development of large houses outside other Cotswold villages within the West Oxfordshire District. It therefore is important that the decision takes this into account as a matter of importance to have regard to.	
26	P26	Contrary to policy	The proposal is contrary to policies OS1, OS2, OS4, H2, EH2, EH3, EH9, and EH10 of the West Oxfordshire Local Plan 2031; the relevant provisions of the NPPF in particular paras 11(b) and (d), 84(e), 180(a) and (b), 186 and 205-206, the West Oxfordshire Design Guide and the Little Tew Conservation Area Character Appraisal.	ML In the circumstances where NPPF Para 84e criteria are satisfied, none of these referenced policies, nor the design guide, nor the LTCA character appraisal would “override” satisfying Para 84e.

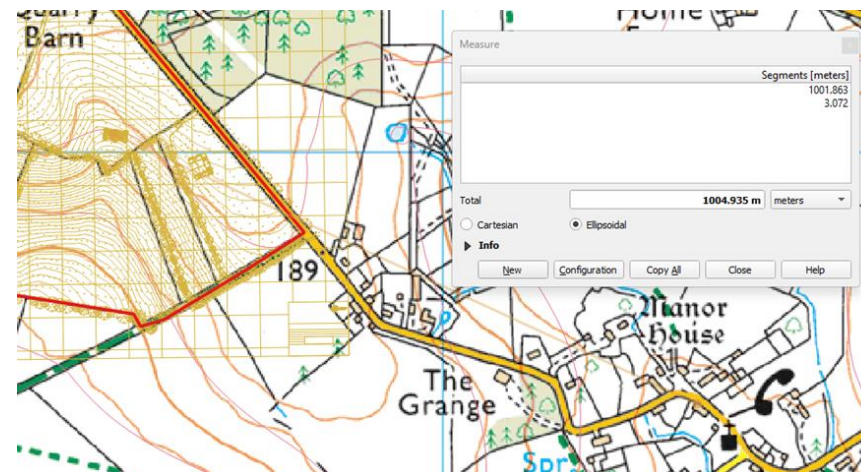


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1	P4/P6	Site location/not compliant with LP Policy OS2	The Proposals Map accompanying the adopted Local Plan shows that the application site is in the open countryside outside the settlement of Little Tew, some 430m northwest of the boundary of the Little Tew Conservation Area and circa 150m north of the Little Tew Meadows SSSI. The application site is within the open countryside where Local Plan Policy OS2 limits development to that which requires and is appropriate for a rural location and which respects the intrinsic character of the area. We contend that the proposals satisfy neither of these requirements. In our view, the proposals do not accord with the requirements of six of the 13 General principles contained within Policy OS2. That being the case, the proposals are indisputably contrary to Policy OS2 and so Policy H2 is unable to be engaged. In our opinion, the principle of development is contrary to Local Plan Policy OS2.	ML By definition an NPPF Para 84e proposal is an “isolated” dwelling and away from a settlement...therefore all such consents occur in the open countryside.
2	P7	Not compliant with LP Policy H2	Of the eight circumstances specified within Local Plan Policy H2 (as listed in the bullet points above), it is clear that the proposals do not involve development that accords with the first two or the last five bullet points. The remaining potentially relevant circumstance is where the proposals involve residential development of exceptional quality or innovative design. The proposals are plainly not of an innovative design. Moreover, the Conservation Group (including one of its members who is an architect) is adamant that it is also not of exceptional quality in that it is not truly outstanding reflecting the highest standards in architecture and would significantly enhance its immediate setting and be sensitive to the defining characteristics of the area.	SW
3	P8/P9	Do not consider the site is “isolated”	There is some disagreement, however, as to the specific element of the proposals that should be assessed. Counsel in 2022 considered that it should be the actual house. Others deem it to be the boundary of the application site. In Braintree, Sir Keith Lindblom refers to “the development” which in the case of the current proposals includes the house, stables, accesses, formal gardens and the lake. In our view, it is correct to consider the proposals in their totality as they collectively form the proposed	SW CB The site of the main house to the centre of Little Tew village is approximately 1km. The figure stated in 2.1 Site and study area, within the LVIA is simply to set context and not intended to be a technical figure.

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			home. We estimate the distance from the proposed development (the application site boundary) to the settlement of Little Tew (Rymans Cottage) is circa 215m, that is roughly the length of two football pitches. In our opinion, such a distance cannot reasonably be considered to be ‘far away from’ or ‘remote from’ the settlement. Accordingly, we do not consider the proposals amount to the provision of an isolated home in the countryside. Looking at the detail, it is noted that the LVIA says that the site lies about 1 km northwest of the village of Little Tew, which is plainly not correct.	
4	P9	Landscape Considerations	These photographs show the elevated, open and exposed nature of the application site, which is readily visible in panoramic views, some of which include parts of the village, from a host of public vantage points. The footpaths, bridleways and lanes from which the photographs... “Low grade, low quality agricultural landscape.” Mr Harris clearly disagrees with this description because of the intact condition of the landscape, its distinctiveness and its representativeness of the published landscape character types that inform the character of the local landscape at Little Tew.	CS/ CB The contour lines show that the application site is slightly higher than the land to the south and this is shown clearly and accurately in the visualisations in Appendices 2 and 3 of the LVIA. While the photography referred to does not comply with Landscape Institute technical guidance on LVIA photography, the views broadly equate to viewpoints 5, 11, 12 and 13 assessed within the LVIA. Appendices 2 - 4 of the LVIA demonstrate clearly the impact on views and this is accounted for within the visual impact assessment.



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				Section 9 and table 5. The change in view from these viewpoints has been assessed as majorly beneficial since the landscaping scheme strengthens the key characteristics of the landscape type and addresses the landscape strategy for the types, set out in both the OWLS study and the 1998 LCA. Section 5.5 of the LVIA highlights the condition factors that are set out clearly in both the character evidence bases, in so far as they relate to the application site. This section highlights the fact that the site overall is consistent with a number of poor condition factors such as intensively managed arable fields, conversion from pasture to arable, the loss of species richness from existing pasture fields due to agricultural improvement over decades, over failed and gappy hedgerows and the replacement in places of hedgerows with fencing. The landscape strategy seeks to address all of these condition factors, strengthening the field pattern and returning arable land to species-rich pastures.

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				The LVIA also considers the value of the different landscape attributes and ascribes value ratings to them in section 5.4 using guidance set out in ‘Assessing Landscape Value Outside National Designations’ Landscape Institute Technical Note 02/21. Table 5.4.1 sets out the value ratings and gives a clear and transparent justification for them.
5	P10	Harm to landscape	The LVIA also gives weight to one of the key strategies in the OWLS to safeguard, maintain and enhance the characteristic landscape features of the existing parklands in order to support the creation of a new area of parkland. It does not give a ‘green light’ to establish new parklands. In any event, as Mr Harris further explains at paragraph 32 of the Technical Note, “Introducing views of a house and its parkland into a landscape distinctive for its exposed, sparsely settled rural characteristics would be harmful ...”	CB The LVIA accepts that there will be a change to the landscape as a result of the development. The key question is whether that change will be a positive or negative change. The LVIA describes the landscape features of Parkland and Estate Farmland character types, since these types are both found within the same broader Landscape Character Area (Ironstone Valleys and Ridges) as the application site and as such are relevant in terms of the landscape context of the site and the proposal, since the proposal introduces attributes from these landscape types The LVIA then examines the value of both existing and proposed landscape attributes supported by the evidence base. This assist in helping to determine if the change is a positive or negative change. Within table 5.4.1, landscape attributes from the Parkland and Estate Farmland types have been assessed in terms of their value and afforded high value for the reasons outlined in the justification. Other attributes from the types within the application site have also been highly valued, enabling a fair and balanced assessment. The Landscape Institute/ IEMA guidance addressed the question of negative and positive effects in 5.3.7 of the guidance. <i>“One of the most challenging issues is deciding whether the landscape effects should be categorised as positive or negative. It is also possible for effects to be neutral in their consequences for the</i>

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				landscape. An informed professional judgment should be made about this and the criteria used in reaching the judgment should be clearly stated. this might include, but should not be restricted to - - The degree to which the proposal fits with existing character - The contribution to the landscape that the development may make in its own right, usually by virtue of good design, even if it is in contrast to existing character.” The West Oxfordshire Landscape Study defines parkland and estate farmland types as follows “These are highly distinctive landscapes associated with large country houses and estates where a formal or designed character has been imposed upon the underlying landscape. They include: • Parkland - comprising the grand designed landscapes of the C18 and other, smaller areas of formal parkland with typical characteristics of parkland trees, avenues, woods, lakes and other formal landscape features; • Estate farmland - the wider farmed landscape of large country estates, typically with a mature, well-managed and well wooded character (with copses and coverts).” While clearly the definition of parkland does major on those landscapes associated with parkland developed during the C18, the definition allows for other areas of formal parkland. There is no time depth element to the definition of estate farmland. There is no red light on the establishment of new areas of these landscape types, particularly since they are already highlighted by the study as occurring within the same character area as the application site.
6	P10	Artificial lighting affecting quality of the dark skies	harm will be exacerbated by the inevitable introduction of artificial lighting which will lead to the development being more noticeable, particularly at night, as well as a reduction in the quality of the dark skies in an area of existing very dark night sky.	CB As with other NPPF Para 84e projects – even within AONB landscapes – this matter can be covered by condition
7	P10	Value of agricultural	The LVIA assess the value of the agricultural landscape to be low	CB The LVIA establishes value within table 5.4.1 where it

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		landscape	and the landscape and visual effects of seeing a new country house and its formal landscape as beneficial. This is a flawed approach that ignores the distinctiveness of the local landscape character and the magnitude of harmful change that would result from its loss.	ascribes value for all relevant landscape attributes and gives reasoned justification for the value ratings. It is not the case that the LVIA assesses the agricultural landscape to be low across the board, and in some cases, it ascribes high value to existing landscape attributes. There are, however, significant condition factors at play, described clearly in 5.5 that mean that the agricultural landscape is in poor condition, and this has a bearing on its landscape value.
8	P10	Loss of rural openness and agricultural character	in substantial landscape harm through the loss of rural openness and agricultural character. The landscape character of the site forms a part of the wider agricultural landscape ... This harm cannot be mitigated through the extensive tree planting proposed as part of the application.	CB The landscape impact assessment (section 8.3) assesses the impact on the 'Open exposed character on the plateau.' landscape attribute in table 2. It finds the significance of effect to be 'minor neutral' because the flatter, more exposed three fields on the plateau are little changed in terms of landform, although the hedge boundaries will be strengthened with further tree planting, increasing the sense of enclosure. Table 2 also contains a detailed assessment of the land cover elements which lend themselves to the agricultural character of the application site. Some impacts have been shown to be minor adverse and this has been weighed in the overall balance of effects. Adverse effects on agricultural attributes are minor due to being localised in their impact, largely confined to the immediate built form and curtilage. Some change to agricultural attributes, such as the change from intensive arable to species-rich pasture has been assessed as moderately beneficial.
9	P10	Significant visual harm	main house has been located in a commanding position within a parkland landscape intended to frame a broad vista to the south over the valley. This increases the visual prominence of the main building to visual receptors to the south, south west and south east. These receptors include users of the bridlepaths and public rights of way who are sensitive to changes in existing rural views....significant visual harm	CB Views from the house do not necessarily equate to views toward the house, since visibility must be assessed from points of public access, i.e. Public Rights of Way and the road network. A comprehensive spread of viewpoints has been chosen from around the site which give a fair assessment of the visibility from key points of public access. These include close up views where they are available and from locations to the south of the site with views towards the proposed house. Appendices 2-4 show the images from the chosen viewpoints and visualisations from those views

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				determined to be the most significant. The visibility assessment summarised in the LVIA section 9.6 shows that views of the stables are not possible and views from the main house are available from a very limited number of locations. Views of the house are available from locations to the south of the site and from the new proposed gateways on the lane to Little Tew. Visibility of the house will be largely screened by tree planting as part of the landscape strategy, upon the trees reaching maturity. However, views of the house in the interim and residual views e.g. those from VP 16 are considered to be positive, linked to the conclusions of the landscape assessment, summarised in 8.4.2 of the LVIA, where the introduction of a new country house and associated planned landscape is considered to be a positive change.
10	PI0	Visually prominent – fundamental change to character of views	The scale and nature of the proposed stable buildings are also assessed to be potentially visually prominent ...the proposed tree planting will create a fundamental change to the character of the views enjoyed along the road corridor.	CB Viewpoints 8, 9, 14, 15 and 16 show the currently available views from the road corridor. The photography for these views is in Appendix 2. This demonstrates that, aside from some gateway gaps in the roadside hedge (see VPI4), road users are afforded a view of the roadside hedge. There would be no available views of the stables from the road. Road users may experience a sense of a denser field boundary as tree planting matures behind it and eventually grow up above it, as shows in VPs 15 and 16.
11	PI0/11	Landscape assessed as med-high sensitivity	Although the landscape is not designated or identified as a 'valued landscape' I have assessed it to be of medium to high sensitivity due to its distinctive rural character, its intactness and its importance in informing the setting of the dispersed small scale, rural settlement.... scale of change is substantial and passes above a threshold of acceptable harm ... the proposals conflict with both national and local policies that seek to conserve the character... my view that considerable weight should be given to this landscape and visual harm when weighed with other considerations in the overall planning balance.	CB Sensitivity of a landscape attribute to change is assessed by function of its value and its susceptibility to change (i.e. how far the attribute can absorb the change without unduly altering its baseline character). Table 2 of the LVIA sets out the sensitivity assessment for the range of attributes assessed. Some attributes have been awarded a rating of low sensitivity where the baseline position will not be unduly influenced by the proposal and where, by function of being very common and being in poor condition, they have been assessed as having low value. However, other attributes have been assessed as having medium or high sensitivity, for example the

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				enclosed patchwork landscape of the Semi Enclosed Valleys and Ridges landscape type. Section 5.5 of the LVIA explains the current condition of the site and why it isn't currently intact. Since they are all within the same character area, described within the 1998 West Oxfordshire Landscape Character Assessment, it follows that the parkland and estate landscape types found at Great Tew are also important in informing the setting of Little Tew.
12	P11	Failure to comply with LP Policy EH2	In our view, supported by the analysis and conclusions provided in the Landscape Review Technical Note prepared by Paul Harris of MHP Design Ltd, the current application proposals fail to comply with most, if not all, of the requirements of Local Plan Policy EH2.	CB The conclusions of the LVIA summarises in section 10, demonstrates that there is a change to character but that the change will be a positive one, with the introduction of valued elements from the Parkland and Estate Farmland landscape types found within the Character Area. The design of the house and the landscape strategy seeks to strengthen these valued characteristics. The LVIA also examines attributes of existing character found on the site and judges the effects on these characteristics to be minor, and in many case beneficial, since the landscape strategy seeks to address the issues of poor condition of these attributes and deliver on the landscape strategies outlined for the existing landscape character types on site. From a visual perspective, views of the house will be localized and of the stables, negligible, since the landscape strategy aims to rest the built form within a well treed landscape. Despite this, and linked to the conclusions of the landscape assessment, limited residual views of the exceptionally designed new estate house within its planned landscape will be beneficial. In line with the conclusions, the proposal accords with policy EH2 in that it is an overall beneficial change linked to culturally valuable landscape types found within the landscape setting of the application site. In addition, the landscape strategy seeks to enhance character, tranquility, visual

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				amenity and biodiversity by strengthening field boundaries, enhancing pastures, reverting intensive arable to species-rich pasture, introducing natural water features and introducing a significant number of mature trees.
13	P13	Potential adverse impacts on SSSI – missing documents from application	potential adverse impacts of the proposals on the SSSI arising during the construction and operational phases together with the paucity of the information and analysis of likely effects provided within the application documentation. A number of very important documents are simply missing from the current application, which at the very least should be provided to allow the Council to fulfil its dutythe reaction of Natural England to the nearby application is indicative that the report prepared by Water Resource Associates is well informed and accurate in its assessment of the lack of necessary information.	TB There will be no direct impacts on the SSSI during construction or operation. All potential indirect impacts will be mitigated. The proposed building and hardstanding areas will have negligible impact on groundwater flows, as the soils are quite impermeable at this location. The proposed development will affect approximately 0.61% of the River Dorn's catchment area and therefore have a negligible impact on flow rates. A surface water drainage strategy has been submitted with the planning application providing information for the proposed Sustainable Drainage Systems (SUDS) and flow control measures. The proposals will control surface water from the proposed development, mimicking pre-development conditions. Furthermore, the proposed SUDS will treat surface water from the site before discharging into the river. A construction environmental management plan (CEMP) will be submitted prior to construction, via a planning condition, including temporary measures for managing and treating run-off from the site during construction. There is sufficient space on site to provide Sustainable Drainage Systems for collection of silt and contaminants and for controlling the surface water from the site. The surface water drainage strategy states that gravel surfaces will form the access road and several paths, allowing water to infiltrate into the ground and mimicking natural conditions. The proposed building will be constructed in an

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				area where Whitby Mudstone forms the bedrock geology. This stratum has a very low permeability and therefore its contribution to the catchment is more by surface water than baseflow. The surface water from the new building will mimic existing conditions. The proposed SuDS and flow control device will further treat and regulate the flows from this area. The foul water from the development will be directed through a sewerage treatment system. Treated water will discharge into a proposed drainage field where it will infiltrate into the ground. An overflow from the drainage field will direct any excess clean, treated water to the lake where it will be further diluted. No embankments or other above ground retaining structures are proposed for the lake. The lake will be constructed below the existing ground level. Therefore, the risk of a breach is low. An overflow can be provided to mitigate the risk of overtopping. Details will be provided in the detail design and can be shared with the LPA. A planning condition for the development's drainage proposals is expected for this development. There are no "very important documents" missing from the application.
14	PI3/14	Ecological Impact Assessment/BNG unreliable	There are significant and serious omissions and factual errors within the surveys underpinning the EcIA, BNG Assessment and calculations, mapping and condition sheets. Consequently, the ecological impact assessment and BNG calculation etc. are unreliable. Strong evidence exists that the nature conservation interest of a grassland field (identified as a Priority Lowland Meadow habitat on the 'Magic' website) has been substantially and actively denuded over the last 5-7 years. Restoration of this grassland field should be a minimum requisite and not count as part of the proposals BNG enhancements.	TB There was one minor error within the BNG Metric, and that was that the on-site (red line) and off-site (blue line) areas of habitats were not separated, as they should have been. This has now been corrected. The correction has had no significant effect on the results of the calculation, which still show a BNG of greater than +10%. The BNG Metric was first run in April 2024, with the result of +78.48% net gain in habitats (+66.37 Habitat Units) and +17.40% net gain in hedgerows (+10.26 Hedgerow Units).

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			Insufficient consideration is given in the application assessments to the risks posed by the proposals to the SSSI.	There was a minor error in that Metric, in that on-site (red line) and off-site (blue line) habitats were not separated as they should have been. This has now been corrected (in October 2024), with the result of +649.48% net gain in habitats (+65.28 Habitat Units) and +75.82% net gain in hedgerows (+4.72 Hedgerow Units). In light of the field survey data gathered by Bioscan in September 2024, the Metric was re-run using Bioscan's new habitat baseline, with the result of +470.81% net gain in habitats (+87.49 Habitat Units); result for hedgerows remains unchanged. The Biodiversity Net Gain (BNG) Assessment shows that there will be a significant net gain in biodiversity as a result of the proposals. The net gain is being driven by the substantial habitat creation and enhancement that is included within the proposals, particularly with The Statutory BNG Metric is a tool by which net gains can be quantified. The greater than +10% uplift in the biodiversity value of the site is driven through the retention and enhancement of grassland habitats, the creation of grassland habitats (from former arable land), creation of woodland, parkland and a lake, as well as the creation and enhancement of hedgerows. The removal of arable cultivation alone is likely to result in a significant ecological enhancement. There has been no degradation of habitats since the site was first surveyed in 2020. Agricultural practices that were undertaken prior to the current landowner purchasing the two southern fields has no relevance to the application, or to

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				the BNG calculation. The Government’s rules and guidelines regarding what date to use when determining the ecological baseline for Biodiversity Net Gain Assessments is quite clear. It states that the date used to calculate the on-site pre-development biodiversity value should be “the date of the application; or a proposed earlier date. If the applicant proposes an earlier date, they must provide a reason for this. This earlier proposed date cannot be a date which is before the day on which Schedule 7A came into force in relation to the development.” For the application site, this date is 2nd April 2024. The date of the Biodiversity Net Gain Assessment (Windrush Ecology, 2024) for the application site is 17th April 2024. The Government rules go on to state that “Surveys of the development site to calculate the pre-development biodiversity value of the on-site habitat should ideally be done shortly before the submission of the planning application, to ensure.....the pre-development biodiversity value is accurate. Older surveys can be used where there has been no material change in the on-site habitat when the planning application is submitted.” The application site was first surveyed by Windrush Ecology in July 2020. Surveys in 2021 and 2024 have confirmed that there has been no “material change in the on-site habitat” since that date. The surveys undertaken by Windrush Ecology and Bioscan clearly show that there has been no degradation in grassland (or other) habitats since the first habitat survey was undertaken in July 2020, and the current land manager has confirmed that no fertiliser has been used within these two fields since the current owner took ownership in October 2018 (south-western field) and October 2019 (south-eastern field).

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				No unauthorised degradation of the on-site habitat has taken place between 30th January 2020 and 2nd April 2024. Enhancement of the south-western field to Lowland Meadow will be undertaken as part of the proposals and will count as part of the proposals BNG enhancements. There is nothing within the Government's rules or guidance that say that this should not be the case. Potential risks to the Little Tew Meadows SSSI have been discussed within other responses.
15	PI4	Contrary to LP Policy EH3 and NPPF Para 186	the Council must adopt a precautionary approach and apply its stated mitigation hierarchy and reject the current application on the basis of it being contrary to Local Plan Policy EH3 and paragraph 186 of the NPPF. As Bioscan conclude in paragraph 8.7 of their report "In short, the submission material on ecology is subject to serious omission, error and deficiency which, independently and collectively, provide no confidence that the scheme is, or can be made policy compliant."	TB The Ecological Impact Assessment is considered to be robust and accurate. Please refer to other responses for more detail.
16	PI4/15	BNG Metric is incorrect	In conclusion, the BNG Metric that has been submitted to West Oxfordshire District Council is subject to clear and significant error and cannot be relied upon for planning determination purposes. There needs to be a greater commitment to genuine, realistic and achievable on and off-site enhancements, greater confidence that these will be delivered given the land-use history here and (as a pre-requisite) a commitment to restore all of the damage recently done.	TB There was one error within the BNG Metric, and that was that the on-site (red line) and off-site (blue line) areas of habitats were not separated, as they should have been. This has now been corrected. The correction has had no significant effect on the results of the calculation, which still show a BNG of greater than +10%. The BNG Metric was first run in April 2024, with the result of +78.48% net gain in habitats (+66.37 Habitat Units) and +17.40% net gain in hedgerows (+10.26 Hedgerow Units). There was a minor error in that Metric, in that on-site (red line) and off-site (blue line) habitats were not separated as they should have been. This has now been corrected (in October 2024), with the result of +649.48% net gain in

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DK PLANNING & DEVELOPMENT - covering letter				
				habitats (+65.28 Habitat Units) and +75.82% net gain in hedgerows (+4.72 Hedgerow Units). In light of the field survey data gathered by Bioscan in September 2024, the Metric was re-run using Bioscan's new habitat baseline, with the result of +470.81% net gain in habitats (+87.49 Habitat Units); result for hedgerows remains unchanged. The proposed habitat creation and enhancement, as demonstrated within the landscaping plans, is genuine, realistic and achievable. This includes the enhancement of one field to Lowland Meadow. There has been no recent damage to habitats within the site. Please refer to other responses for more detail.
17	PI6	No material change since last application	This lack of any material change suggests that the Council's view on the impact on the setting of the Little Tew Conservation Area should not alter from that concluded two years ago.	SW/FT
18	PI6	Adverse impact on setting	...impact on the setting of the village conservation area, not simply in visual terms when viewed from across the Dorn valley and from the lane between the Meetings and the northwest edge of Little Tew, but also in respect of the nature of the activity that will be introduced particularly as observed and experienced from the bridleway immediately to the southeast of the application site.	NW/ND
19	PI6	Harm outweighs any benefits	We have already commented on the applicant's inability to rely on BNG to represent a positive factor in the determination of the current application which solely leaves the provision of a single dwelling and its contribution to the Council's 5 year housing land supply. As a result, it is our view that the harm to designated heritage assets as previously identified by the Council will not be outweighed by any public benefits as required by Local Plan Policy EH9 and the NPPF.	TB The Biodiversity Net Gain (BNG) Assessment shows that there will be a significant net gain in biodiversity as a result of the proposals. The BNG process compares the ecological value of the site as it is currently (baseline), with the proposed habitat creation and enhancement. The result clearly indicates that the benefits outweigh any "harm". The net gain is being driven by the substantial habitat creation and enhancement that is included within the proposals, particularly with

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				The Statutory BNG Metric is a tool by which net gains can be quantified. The BNG Metric was first run in April 2024, with the result of +78.48% net gain in habitats (+66.37 Habitat Units) and +17.40% net gain in hedgerows (+10.26 Hedgerow Units). There was a minor error in that Metric, in that on-site (red line) and off-site (blue line) habitats were not separated as they should have been. This has now been corrected (in October 2024), with the result of +649.48% net gain in habitats (+65.28 Habitat Units) and +75.82% net gain in hedgerows (+4.72 Hedgerow Units). In light of the field survey data gathered by Bioscan in September 2024, the Metric was re-run using Bioscan's new habitat baseline, with the result of +470.81% net gain in habitats (+87.49 Habitat Units); result for hedgerows remains unchanged. The greater than +10% uplift in the biodiversity value of the site is driven through the retention and enhancement of grassland habitats, the creation of grassland habitats (from former arable land), creation of woodland, parkland and a lake, as well as the creation and enhancement of hedgerows. The removal of arable cultivation alone is likely to result in a significant ecological enhancement.

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INDEPENDENT REVIEW OF ECOLOGICAL IMPLICATIONS (Executive Summary) – Bioscan (UK) Ltd				
1	P3	Omissions and Errors within application documents	The surveys underpinning the EclA, BNG assessment and related calculations, mapping and condition sheets, are all infected by significant and serious omissions and factual errors. The applicant's ecological impact assessment, BNG calculation and the claims flowing from them are therefore unreliable. The EclA, BNG assessment and all elements of the application that draw from them, require to be substantially corrected and revised in order to be adequate for use in planning determination.	TB There was one error within the BNG Metric and this was that the on-site (within the red line) habitats were not separated from the off-site (blue line) habitats. This has now been corrected, with no significant change within the results, which indicate an uplift well in excess of +10%. The BNG Metric was first run in April 2024, with the result of +78.48% net gain in habitats (+66.37 Habitat Units) and +17.40% net gain in hedgerows (+10.26 Hedgerow Units). The minor error in the Metric (regarding the habitats within the red line versus the blue line) has now been corrected (in October 2024), with the result of +649.48% net gain in habitats (+65.28 Habitat Units) and +75.82% net gain in hedgerows (+4.72 Hedgerow Units). In light of the field survey data gathered by Bioscan in September 2024, the Metric was re-run using Bioscan's new habitat baseline, with the result of +470.81% net gain in habitats (+87.49 Habitat Units); result for hedgerows remains unchanged.
2	P3	Omissions within ECIA/Failure to identify Lowland Meadow	The EclA submitted with the application inexplicably fails to document a) that one of the grassland fields is identified as Priority Lowland Meadow habitat on the Government GIS website 'Magic' (despite claims that this data source was specifically consulted), and b) further fails to record the fact that there is (as confirmed in September 2024) relict Lowland Meadow and calcareous flora growing in this field. In fact, the EclA goes so far as to rule out any scope for named plant species characteristic of the nearby SSSI and/or high value habitats more generally to be present on the application site. Precisely those species were confirmed to be growing on the site by Bioscan on 9th September 2024.	TB The MAGIC website was consulted in 2020, and it was noted that the south-western field was annotated as Lowland Meadow. However, the field survey in July 2020 (updated 2021 & 2024) clearly showed that the habitat was not a Lowland Meadow as defined by the UKHab classification system, or by the (former) UK Biodiversity Action Plan. This should have been discussed within the EclA report, for full transparency. It was not, as it was considered that the field survey data reflected the true status of the grassland habitat on the ground, and that there may have been an error on the MAGIC map.

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				The field data gathered by both Windrush Ecology and Bioscan show that the grassland within the south-western field does not meet the criteria for a Lowland Meadow according to the UKHab Classification, nor the (now defunct) UK Biodiversity Action Plan. In order for the grassland to meet the criteria for a Lowland Meadow under the UKHab Classification, the sward must support more than 15 species on average per m2. Data collected by Bioscan in September 2024 indicate that there are 13.4 species on average per m2. In addition, there must also be >30% cover of broadleaved herbs, and this is also not the case as the grassland is dominated by grass species, with herbs in very low abundance. Bioscan’s quadrat data from 2024 corroborate this. The UK Biodiversity Action Plan states that “In terms of National Vegetation Classification (NVC) plant communities, they primarily embrace each type of Cynosurus cristatus-Centaurea nigra grassland, Alopecurus pratensis-Sanguisorba officinalis floodplain meadow and Cynosurus cristatus-Caltha palustris flood-pasture.” The grassland is not considered to meet any of these NVC communities. Bioscan consider that there are “patches of relict” MG5 grassland (Cynosurus cristatus-Centaurea nigra) but C. cristatus was only noted within one of the quadrats (out of five), at the lowest level of abundance. Following the habitat survey in 2020, and subsequent site visits, it was considered that the grassland of the south-western field was best categorised as modified grassland. This was due to the fact that the sward was considered to be species-poor (with less than 9 vascular plant species per square metre) and was dominated by a few, fast-growing grasses on fertile-neutral soils.

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				Data gathered by Windrush Ecology and Bioscan show that this is the case, with the Bioscan data recording false oat-grass <i>Arrhenatherum elatius</i>, Yorkshire fog <i>Holcus lanatus</i>, creeping bent <i>Agrostis stolonifera</i>, Timothy <i>Phleum pratense</i>, meadow foxtail <i>Alopecurus pratensis</i> and red fescue <i>Festuca rubra</i> as the dominant species. The UKHab Classification states that modified grassland “is found in pastures that are used for intensive agricultural production” (as well as amenity grassland). Using the UKHab system, it was not considered possible to categorise the south-western field as ‘other neutral grassland’ as it was considered to meet the following exemption “Species-poor swards that in previous classifications were included within ‘semi-improved neutral grassland’ (see g4)”; g4 is the UKHab code for modified grassland. The baseline was therefore taken as modified grassland for both fields. However, Bioscan’s data from September 2024 has been used to re-assess the grassland habitats and the following changes have now been made to the BNG calculation: Modified grassland, of poor condition, within the south-eastern field is now inputted as modified grassland of good condition. Modified grassland, of poor condition, within the south-western field is now inputted as other neutral grassland of good condition. An additional habitat of ‘tussocky arable margins’ has been separated from the cereal crops habitat type. The narrow fallow arable field has been re-assigned from ‘cropland’ to modified grassland of good condition. The current land manager has confirmed that there is no intention

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				to plough or cultivate this field, and that the intention is for it to remain grassland, and so grassland is considered to be the most appropriate baseline habitat type. Using the above (revised) baseline, the result of the Metric is: +470.81% net gain in habitats (+87.49 Habitat Units)
3	P4	Part of development site has been actively denuded over 5-7 years	There is strong evidence that the nature conservation interest of this part of the proposed development site has been substantially and actively denuded over the last five to seven years. Historic aerial photography, in conjunction with the evident high value status of this site in the past, and the current (2024) botanical composition of the grassland in this field, strongly points to a rapid degradation in nature conservation value starting around 2017/2018. This degradation appears likely to have come about through intensive applications of slurry or other organic or inorganic fertilisers.	TB The Government's rules and guidelines regarding what date to use when determining the ecological baseline for Biodiversity Net Gain Assessments is quite clear. It states that the date used to calculate the on-site pre-development biodiversity value should be "the date of the application; or a proposed earlier date. If the applicant proposes an earlier date, they must provide a reason for this. This earlier proposed date cannot be a date which is before the day on which Schedule 7A came into force in relation to the development." For the application site, this date is 12th February 2024. The date of the Biodiversity Net Gain Assessment (Windrush Ecology, 2024) for the application site is 17th April 2024. The Government rules go on to state that "Surveys of the development site to calculate the pre-development biodiversity value of the on-site habitat should ideally be done shortly before the submission of the planning application, to ensure.....the pre-development biodiversity value is accurate. Older surveys can be used where there has been no material change in the on-site habitat when the planning application is submitted." The application site was first surveyed by Windrush Ecology in July 2020. Surveys in 2021 and 2024 have confirmed that there has been no "material change in the on-site habitat" since that date. Indeed, the survey by Bioscan in September 2024 indicates that there is likely to have been an increase in botanical diversity of the grassland habitats, which is encouraging, as this shows that proposed enhancement of grassland habitats is achievable.

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				The surveys undertaken by Windrush Ecology and Bioscan clearly show that there has been no degradation in grassland (or other) habitats since the first habitat survey was undertaken in July 2020, and the current land manager has confirmed that no fertiliser has been used within these two fields since the current owner took ownership in October 2018 (south-western field) and October 2019 (south-eastern field). No unauthorised degradation of the on-site habitat has taken place between 30th January 2020 and 2nd April 2024. Therefore, there is no need to calculate the biodiversity value as it would have been immediately before the degradation activities were carried out (as there have been none). There has been no “very recent degradation of high value (very high distinctiveness) unimproved grassland habitat” as claimed by Bioscan.
4	P4	Deliberate degradation of land to ensure BNG results	Regardless of any conclusions one might draw from these collective facts (and related questions around any confidence that can be had in future land management commitments), this seems to be a clear-cut case for where elements of BNG guidance that are intended to dissuade developers from benefiting from recent degradation of habitats, apply, whether such degradation is deliberate or otherwise.	TB There has been no deliberate degradation of land to ensure BNG results.
5	P4	Land should be re-evaluated as Lowland Meadow and BNG recalculated	We do not believe the applicant can or should expect to be rewarded for merely undoing damage recently inflicted on a high value habitat. We conclude that the starting point for assessment of impact using the BNG scheme should be that this field should be considered, per its Magic designation, as Lowland Meadow, and further that in the absence of any evidence to the contrary, it should be considered as having been in ‘good’ condition prior to recent degradation. It considered in that condition, any recovery of quality and condition of this field cannot be considered an enhancement benefit of the proposals, merely an attempt at restoration from damage very recently done. It cannot count positively towards a BNG score. We note that relevant BNG	TB The proposals are to enhance the south-western field to Lowland Meadow (from other neutral grassland) of good condition. This is considered to be easily achievable since the grassland is particularly poor in its herb diversity and abundance. The resultant uplift in Habitat Units can be used within the BNG score, and count positively towards it. There has been no deliberate degradation of land to ensure BNG results. The applicant should therefore not be ‘punished’ for any actions by a previous land manager.

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			guidance is supportive of this approach.	Dates for taking baseline habitat status are controlled by the Government rules and guidelines for BNG assessments. You cannot simply state that you believe that degradation (as a result of quite normal agricultural practice) has, at some point in the past, been undertaken to suit your purpose to discredit the BNG results.
6	P4/5	Field should be returned to original status and not considered a benefit in the planning balance	suggest that restoration of this field from its current degraded condition to that original status should be a minimum requisite of this and/or any other future planning proposal and/or planning permission (or indeed any future agri-environmental payments) related to this landholding. Further, that due commitment to it by the applicant/landowner should be treated as an essential, but otherwise entirely neutral matter in the planning balance, not something that counts in favour of the scheme. In other words, no positive planning weight should be attributed, either via the BNG calculation or in the consideration of the application more generally, to the action of undoing the harm recently done to nature conservation here. This applies regardless of whether such damage has come about intentionally or inadvertently.	TB There has not been any ‘recent harm’ to nature conservation. The proposals are to enhance the grassland within the south-western field to Lowland Meadow. This is just one of a number of habitat enhancement, and creation, measures that are proposed and which are ignored within the Bioscan report. Habitat creation and enhancement also includes woodland, parkland, grassland, lake and hedgerows.
7	P5	Risks to SSSI not considered – in particular, surface and foul water drainage/pollution	the site extends as close as 140m from the Little Tew Meadows SSSI, is upslope of it, and is connected to it by both groundwater conduits and by means of surface drainage features – the existence of some of which is omitted from the EclA and drainage strategy. Insufficient consideration is given in the collective assessments to the risks posed by the proposed development to the SSSI, in particular from surface and foul water drainage and disposal, and the risk of pollution. Such risks engage with statutory obligations and also with weighty policy presumptions against granting consent for projects that risk harm to such sites.	TB The EclA does consider the potential risks to the Little Tew Meadows SSSI. The conclusion is that (with the proposed mitigation in place, including a Drainage Strategy) there will be no significant direct or indirect impacts on the SSSI. The proposed removal of arable agriculture (which includes fertiliser application) is likely to result in an enhancement. The majority of these arable fields are directly above the Principal Aquifer.
8	P5	Harm to SSSI – surface and foul water discharge and diversion to lake of surface/groundwater	Due to the topographic relationship between the proposed development and the adjacent SSSI, and the nature of the local soils and geology, this surface and groundwater discharge is likely to resurface within the SSSI. The diversion of surface and groundwater to the lake may also interfere with groundwater	TB There will be no direct impacts on the SSSI during construction or operation. All potential indirect impacts will be mitigated.

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			regimes supporting the SSSI interest features.	The proposed building and hardstanding areas will have negligible impact on groundwater flows, as the soils are quite impermeable at this location. The proposed development will affect approximately 0.61% of the River Dorn's catchment area and therefore have a negligible impact on flow rates. A surface water drainage strategy has been submitted with the planning application providing information for the proposed Sustainable Drainage Systems (SUDS) and flow control measures. The proposals will control surface water from the proposed development, mimicking pre-development conditions. Furthermore, the proposed SUDS will treat surface water from the site before discharging into the river. A construction environmental management plan (CEMP) will be submitted prior to construction, via a planning condition, including temporary measures for managing and treating run-off from the site during construction. There is sufficient space on site to provide Sustainable Drainage Systems for collection of silt and contaminants and for controlling the surface water from the site. The surface water drainage strategy states that gravel surfaces will form the access road and several paths, allowing water to infiltrate into the ground and mimicking natural conditions. The proposed building will be constructed in an area where Whitby Mudstone forms the bedrock geology. This stratum has a very low permeability and therefore its contribution to the catchment is more by surface water than baseflow. The surface water from the new building will mimic existing conditions. The proposed SuDS and flow control device will further treat and regulate the flows from this area. The foul water from the development will be directed

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				through a sewerage treatment system. Treated water will discharge into a proposed drainage field where it will infiltrate into the ground. An overflow from the drainage field will direct any excess clean, treated water to the lake where it will be further diluted. No embankments or other above ground retaining structures are proposed for the lake. The lake will be constructed below the existing ground level. Therefore, the risk of a breach is low. An overflow can be provided to mitigate the risk of overtopping. Details will be provided in the detail design and can be shared with the LPA. A planning condition for the development's drainage proposals is expected for this development.
9	P5	Insufficient evidence to show no harm to SSSI	Insufficient evidence has been submitted to permit the LPA and consultees such as Natural England to fully assess whether the SSSI and its hydrologically dependent special interest will be adequately protected from the range of water quality threats generated by the development	TB Please refer to response above.
10	P5	Drainage Statement does not mention SSSI	In fact, it is notable that the Drainage Strategy does not mention the SSSI, or the need to protect it, at all.	TB Please refer to response above.
11	P5	Ecological/other impacts of excess surface water/treated effluent discharge routes	Neither of these excess surface water or treated effluent discharge routes or systems appear to have been properly particularised or assessed in terms of their ecological (and other) impacts.	TB Please refer to response above.
12	P6	Incorrect information and impact on BNG	It is now evident that WODC were provided with erroneous and sub-standard ecological information. In respect of the current (very similar) scheme, our report demonstrates how if even one of a suite of necessary corrections are made to the applicant's Metric inputs, the BNG score drops to a level below the statutory requirement of 10%	TB The minor error in the Metric (regarding the habitats within the red line versus the blue line) has now been corrected (in October 2024), with the result of +649.48% net gain in habitats (+65.28 Habitat Units) and +75.82% net gain in hedgerows (+4.72 Hedgerow Units). In light of the field survey data gathered by Bioscan in September 2024, the Metric was re-run using Bioscan's new habitat baseline, with the result of +470.81% net gain in

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				habitats (+87.49 Habitat Units); result for hedgerows remains unchanged. The Statutory BNG Metric is a tool by which net gains can be quantified. The greater than +10% uplift in the biodiversity value of the site is driven through the retention and enhancement of grassland habitats, the creation of grassland habitats (from former arable land), creation of woodland, parkland and a lake, as well as the creation and enhancement of hedgerows. The removal of arable cultivation alone is likely to result in a significant ecological enhancement.
13	P6	Inadequately assessed risks to SSSI and River Dorn	closely consider the relevant statutory and national and local policy tests surrounding the inadequately assessed risks to the adjacent SSSI and River Dorn, and the uncertainty around impacts on protected species.	TB There will be no direct impacts on the SSSI during construction or operation. All potential indirect impacts will be mitigated. This is further explained in previous responses.
14	P6	Species Surveys inadequate	there are a range of further deficiencies in the species surveys undertaken by the applicant's ecologists. In particular (and given the known presence locally of the rare bat species barbastelle and lesser horseshoe), the failure to undertake any bat activity surveys to assess which bat species use the site (and how), means the assessments for this species group are made in a data vacuum, and are not robust or reliable. Whilst the Windrush report does include the results of a ground-based assessment of the potential of some boundary trees to harbour bat roosts, this has overlooked numerous other trees with clear bat roosting potential. The scope for reptiles is dismissed, despite known populations and recent records locally, and the presence of suitable habitat on-site. The assessments of use of the site by badgers or birds are wholly incorrect or deficient. These survey and assessment deficiencies leave the LPA bereft of relevant and important detail when contemplating the potential scope for impact on protected species, including from lighting impacts and	TB The species surveys are not inadequate, but they are proportionate to the proposals, which are demonstrated to have a significant enhancement to habitats, and thus to species. Undertaking endless species surveys, which inevitably will not change the approach to mitigation, compensation and enhancement is disproportionate to this application. Bat activity surveys were not considered to be necessary, as they were considered to be disproportionate to the proposals, and unnecessary to inform appropriate mitigation and enhancement. It is considered that the desk study and professional judgement/experience provide an adequate baseline to the habitat assessment for bats (i.e. there is no data vacuum). A Lighting Strategy can be placed as a condition on the planning consent to avoid any indirect impacts on bat

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			loss of foraging area.	activity. There will be no loss of foraging area. Indeed, the opposite is considered to be the case, with arable land converted into grassland and the creation of a lake. Hedgerows will also be strengthened and created, so will woodland and parkland; all of potential benefit to bats. Ground based assessment of trees, for roosting bats, is subjective and open to professional opinion. All of the trees identified by Bioscan as having bat roost potential are located outside of the application site (red line) and will be retained. Reptiles can be protected from killing and injury through the adoption of a Precautionary Working Method and through a Construction Environmental Management Plan (CEMP) as a condition to the planning consent. No reptile survey is considered necessary, as the approach to mitigation will not change if it is confirmed that there are grass snakes within field margins or grassland habitats. There are no badger setts within the site (red line and blue line). This has been confirmed in 2020, 2021 & 2024. There are no foreseeable impacts on badger setts, including disturbance of badgers when occupying a sett. Nesting birds can be protected through the adoption of a Precautionary Working Method and through a Construction Environmental Management Plan (CEMP) as a condition to the planning consent. The majority of grassland habitats will be retained, and enhanced. Arable land will be converted into grassland and parkland, providing suitable habitat for foraging birds, including kestrel and barn owl. There are no foreseeable impacts on great crested newts or hazel dormice as these species are considered to be absent from the site. Natural England's Rapid Risk Assessment for great crested newts shows that an offence is 'highly unlikely'. An appraisal of the hedgerow habitats and habitat

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15	P6	Ecology application submissions are inadequate	the application submissions on ecology fall a long way short of minimum industry standards and a long way short of the information requirements set down by incumbent planning practice guidance. In short, the applicant's supporting information on ecology is in parts erroneous, in parts deficient, and overall, wholly unreliable for decision making. It provides no confidence to the LPA that potentially significant risks to the nearby SSSI, to protected species and to biodiversity generally, can and will be adequately mitigated or compensated.	connectivity to woodland habitats has been undertaken, with the conclusion that dormice are absent from the site. TB This is simply not the case. One minor error has been corrected within the Metric, and it is acknowledged that there should have been more discussion regarding Lowland Meadow habitat being shown on the MAGIC website. The Metric has been updated using the data gathered by Bioscan in September 2024 and the result is +470.81% net gain in habitats (+87.49 Habitat Units). There are no potentially significant risks to the nearby SSSI and all potential impacts on protected species have been adequately considered. What Bioscan's whole study fails to acknowledge is the significant ecological enhancement that will be delivered by the proposals. The habitats enhancements include lowland meadow, other neutral grassland, lake, woodland, parkland and hedgerows. The south-western field is not located within the application site (red line). This field was included within the blue line boundary at the specific advice of the applicant's ecologist, in order to deliver ecological enhancement to the habitat. The applicant could have quite simply left this field out of the blue line boundary entirely. Species that are likely to benefit from these habitat enhancements include bats, breeding birds, amphibians, reptiles, small mammals & invertebrates. The Bioscan report should be read for what it is, a vitriolic and melodramatic attack on a fellow professional with the

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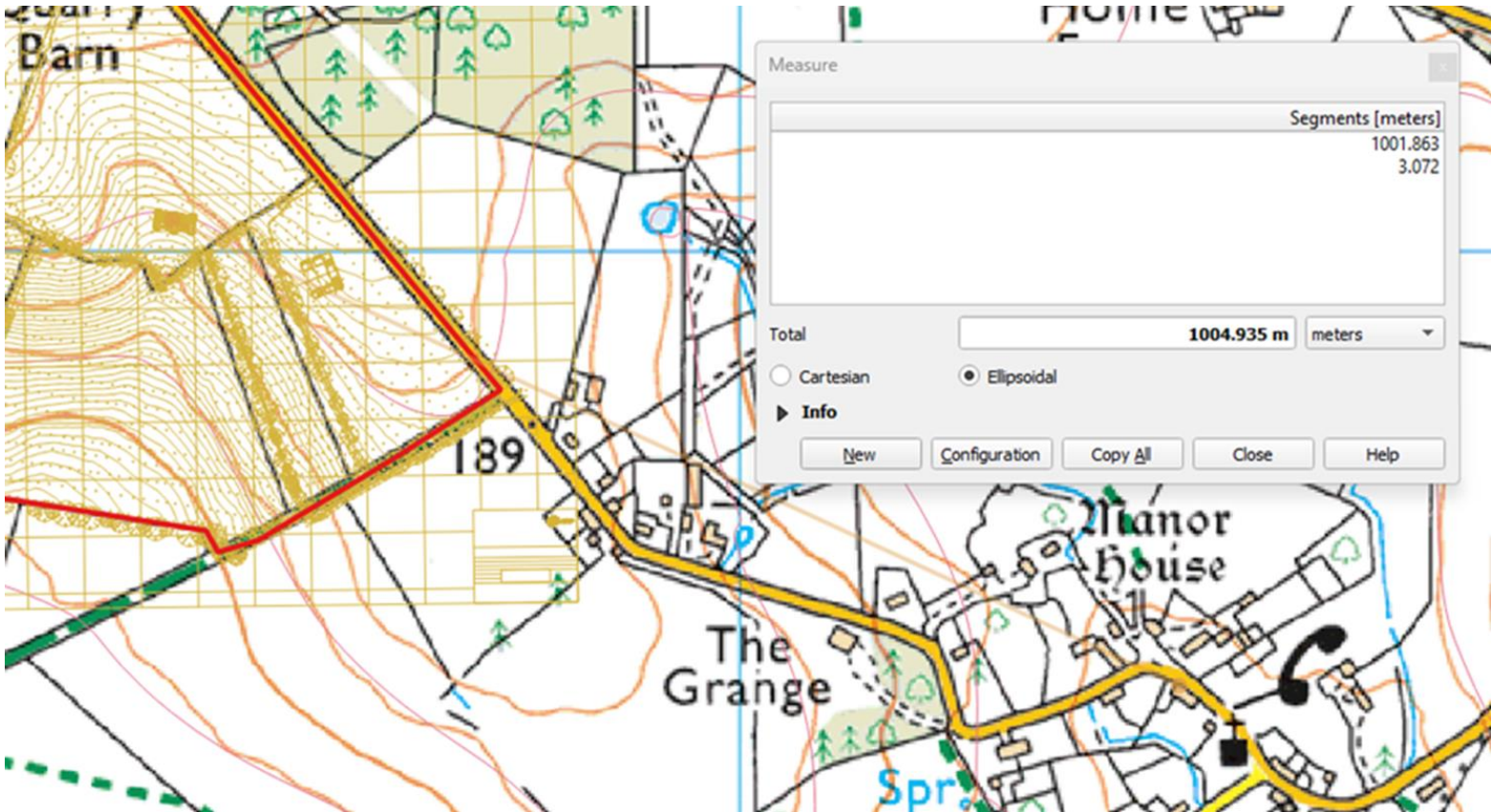
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				sole aim of discrediting what is a robust and accurate ecological assessment.

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MHP - Landscape Review Technical Note				
1	P2	Landscape unchanged from previous scheme – harm is not addressed – LVIA attempts to justify harm	...surprising given that the design statement for the revised scheme makes specific reference to the reason for refusal and acknowledges that the original scheme failed to significantly enhance its immediate setting or be sensitive to the defining characteristics of the local area. However, I can only identify changes to the detailing of the architecture rather than other broader changes that might address the wider implications of the proposals identified in the delegated officers report. ...harm to character and appearance of the landscape, no reference is made in the supporting documentation (that I can identify) of how changes incorporated into the new scheme have addressed previously identified harm through changes to the design or through new mitigation measures. An LVIA has now been prepared for the current scheme and whilst I welcome this, it appears that its role is to justify the current proposals (which appear based on the previous proposals) rather than to have taken the opportunity to inform the approach to a new design which may have been able to address the fundamentals which resulted in the refusal of the previous scheme.	CS It is incorrect to state that the landscape proposals are unchanged. The scheme has evolved from the previous submission with the very helpful input and advice from SEDRP during three rounds of presentation and discussion. Their assessment of the original proposal was that “the visual analysis of the landscape is excellent and the landscape proposal. . . is of a high quality” They did make three particular recommendations which have been incorporated into the new scheme: Firstly that there should be an opening in the boundary planting to enable views to the house and lake for the community from the bridlepath along the south eastern boundary. This has been incorporated. Secondly, that there should be rainwater harvesting scheme to direct water to the lake. This has been incorporated and more detail provided. Finally, that there should be an onsite plant nursery to grow-on seedlings that could provide a diverse source of material for planting within the site and surrounding area. This has been incorporated. Allied to the recommended inclusion of more detailed analysis of the impact of ash die-back and long term visual impact of the scheme and its proposed planting – SEDRP noted that “these measures. . . would help transform what is a good landscape proposition into a truly outstanding one” CB The LVIA seeks to fairly appraise the change and consider whether this change is a negative or positive one. Overall I concludes that the change is a positive one.
2	P3	Location of site is only	The LVIA states that the site lies about 1km northwest of the	CB The site of the main house to the centre of Little Tew

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		217m from nearest dwelling	village of Little Tew. However, the Council identifies that the edge of the site lies at a distance of 217 metres from the edge of the nearest dwelling within Little Tew. The distance of 217 metres is significantly closer than the approximately 1km identified in the LVIA. Distance is important to the baseline because of the pattern of settlement of this 'closed' village. The LVIA identifies key characteristics which it underlines to show relevance to that location but fails to acknowledge the broad landscape characteristics which clearly contribute to the distinctive landscape of the site and its context.	village is approximately 1km. The figure stated in 2.1 Site and study area, within the LVIA is simply to set context and not intended to be a technical figure.



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3	P5	Landscape Character Type/ addition of Parkland	Whilst this LCT is found within the wider landscape it is not relevant to the landscape of the site or the landscape setting of Little Tew. This can be seen clearly in Figure 2. Parkland is therefore a landscape characteristic that cannot be added to a landscape to achieve enhancement any more than a new dwelling built in the vernacular style and in local materials can be dropped into the landscape.	CB If this statement is true, then it follows that landscapes cannot be changed. Landscape change does not always result in adverse effects (harm is a subjective term), if we can demonstrate sustainable development. The development introduces landscape attributes from parkland which is a landscape type found within the wider character area as defined by the 1998 landscape evidence base. The LVIA accepts that there will be a change to the landscape as a result of the development. The key question is whether that change will be a positive or negative change. The LVIA describes the landscape features of Parkland and Estate Farmland character types, since these types are both found within the same broader Landscape Character Area (Ironstone Valleys and Ridges) as the application site and as such are relevant in terms of the landscape context of the site and the proposal, since the proposal introduces attributes from these landscape types The LVIA then examines the value of both existing and proposed landscape attributes supported by the evidence base. This assist in helping to determine if the change is a positive or negative change. Within table 5.4.1, landscape attributes from the Parkland and Estate Farmland types have been assessed in terms of their value and afforded high value for the reasons outlined in the justification. Other attributes from the types within the application site have also been highly valued, enabling a fair and balanced assessment. The Landscape Institute/ IEMA guidance addressed the question of negative and positive effects in 5.3.7 of the guidance. “One of the most challenging issues is deciding whether the

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				landscape effects should be categorised as positive or negative. It is also possible for effects to be neutral in their consequences for the landscape. An informed professional judgment should be made about this and the criteria used in reaching the judgment should be clearly stated. this might include, but should not be restricted to - - The degree to which the proposal fits with existing character - The contribution to the landscape that the development may make in its own right, usually by virtue of good design, even if it is in contrast to existing character.” The West Oxfordshire Landscape Study defines parkland and estate farmland types as follows “These are highly distinctive landscapes associated with large country houses and estates where a formal or designed character has been imposed upon the underlying landscape. They include: • Parkland - comprising the grand designed landscapes of the C18 and other, smaller areas of formal parkland with typical characteristics of parkland trees, avenues, woods, lakes and other formal landscape features; • Estate farmland - the wider farmed landscape of large country estates, typically with a mature, well-managed and well wooded character (with copses and coverts).” While clearly the definition of parkland does major on those landscapes associated with parkland developed during the C18, the definition allows for other areas of formal parkland. There is no time depth element to the definition of estate farmland. There is no red light on the establishment of new areas of these landscape types, particularly since they are already highlighted by the study as occurring within the same character area as the application site.
4	P5	Incorrect assessment of	Overall, the LVIA assesses that the landscape is a ‘low grade,	CB Section 5.5 of the LVIA highlights the condition factors

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		landscape	low quality agricultural landscape'. I consider this to be quite incorrect given the intact condition of the landscape, its distinctiveness and its representativeness of the published landscape character types that inform the character of the local landscape at Little Tew.	that are set out clearly in both the character evidence bases, in so far as they relate to the application site. This section highlights the fact that the site overall is consistent with a number of poor condition factors such as intensively managed arable fields, conversion from pasture to arable, the loss of species richness from existing pasture fields due to agricultural improvement over decades, over failed and gappy hedgerows and the replacement in places of hedgerows with fencing. The landscape strategy seeks to address all of these condition factors, strengthening the field pattern and returning arable land to species-rich pastures.
5	P6	Height of proposed house and visibility in views from wider landscape	The ZTV illustrates the potential visibility of a new building up to 10 metres tall. The LVIA states in 6.2 that the 10m scenario is deemed the worst-case scenario. However, elevations within the application documents state that the building is 10.737m in height excluding chimney and pedestal on which the main house is located. ...it may have been more helpful and realistic to produce a ZTV based on a 12m tall building. However, it remains clear that the ZTV produced illustrates a significant potential for built form to be seen in views from the wider landscape.	CB The ZTV is a bare earth scenario model, showing where it may be feasible to view the proposed built form if other buildings trees and hedgerows etc. were not present. The visual impact assessment clearly demonstrates that mainly due to intervening field boundaries with high hedgerows and mature trees, the actual visibility of the building is significantly more limited. This will continue to be the case. The original ZTV showed the main areas where, by function of elevation and landform the buildings would be visible. This enabled the selection of a representative suite of viewpoints from points of public access at a range of distances.
6	P6/7	Parkland and house views within wider agricultural landscape	the LVIA concludes that views of built form will be highly limited and restricted to a number of locations in the immediate vicinity of the site. I do not agree that these are limited to the immediate vicinity but will be experienced from a much longer distance from the south, south east and from the south west. I also do not agree with the LVIA where it states that where the views will be seen, they will be positive changes. This implied positive change is based on the value attributed by published assessment to parkland within the existing landscape and that seeing new parkland will be as positive of views of historic and long established parkland. This assessment is incorrect. Introducing views of a house and its parkland into a landscape distinctive for its exposed, sparsely settled and representative rural characteristics would	CB See above regarding the judgement on positive or negative in relation to parkland attributes. This statement effectively means that we are no longer able to build our historic houses of the future. All historic houses and historic parkland were new at one point in history, having been created from agricultural landscapes, with their historic context developing over time.

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			be harmful as the parkland and house would have no historic context and be meaningless in a landscape where they have not evolved as part of the wider agricultural landscape.	
7	P7	Harm to Dark Skies	LVIA confirms at 6.4.3 that the site lies within a 'highly dark sky area indicating high levels of tranquillity. The introduction of any light into the site in this location will therefore be harmful to dark skies in this location and a further deterioration in the setting of Little Tew.	CB To be covered by condition.
8	P7/8	Harm to the character of the site, the immediate landscape context and setting of Little Tew	The introduction of the large country house and its formal gardens, grounds and parkland are assessed to result in major beneficial landscape effect although the key characteristics of the published landscape character types will be totally displaced. The house and parkland would not have any historic context to justify this displacement and the total transformation of the landscape would result in substantial harm to the character to the site, the immediate landscape context and the character and setting of Little Tew. The current landscape is not low value but intact and representative of the published landscape character types that create a locally distinctive, deeply rural landscape	CB Harm is a subjective term. The LVIA guidance directs us to think about positive and negative (adverse) change. It is not the case that the attributes of the previous landscape types would be totally displaced. Table 2 in section 8.3 of the LVIA describes clearly the residual effects after mitigation and makes an assessment regarding the significance of these effect of landscape attributes from a range of landscape types relevant to the site and the proposal. See point 4 above in relation to why this landscape is not considered to be intact.
9	P8	Harm to the rural character of the site	Harm to the rural character of the site through the loss of open countryside that contributes to the desirable characteristics of the local landscape character. The open and exposed character of the landscape being very important to local distinctiveness.	CB Far from sitting on a ridge (which is along the line of the main road to the north of the application site), the contours clearly show that the house is sited on the steeper and lower part of the slope, off the plateau. As shown below in Fig I, the main house is within the 'Woodland Pastures Valleys and Slopes' Character Area Type (green shading) (OWLS), while the stables is on the interface between the Woodland Pastures Valley Slope and the Open Farmland Plateau (yellow shading). In limiting tree planting to sparse individual trees within the flatter landscape to the north, the scheme meets the landscape strategy for this landscape type set out in 5.2.2 of the LVIA and maintains the open nature of the type. Similarly, the landscape scheme strengthens the

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				characteristics of the ‘Wooded Pastures valleys and Slopes’ types and contributes to the strategy for this type set out in 5.2.2 of the LVIA, introducing a mosaic of grassland and trees, strengthening the tree cover in the hedges and planting wet woodland type trees on the lower slopes and around the proposed lake. Most of the central and western part of the site is contained within the open valleys and ridges character types (lighter green Fig 2) in the 1998 assessment although the site with the site gently sloping with the three northern most field elevated towards the plateau. In table 2 section 8.3 the landscape impact assessment examines the ‘Open and exposed plateau’ attribute and find that “<i>The flatter, more exposed three fields on the plateau are little changed in terms of landform, although the hedge boundaries will be strengthened with further tree planting, increasing the sense of enclosure.</i>” It assesses the impact as ‘minor neutral’, since the topography will not be changed and the open nature of the fields will not be significantly altered. The proposed woodland planting on the southern side is also consistent with the character described for the West Oxfordshire Landscape Character Type ‘Semi-enclosed limestone wolds’ (Yellow shading Fig 2) set out in 5.2.3 if the LVIA with a key characteristic of the type stated as ‘some visual containment provided by large blocks and belts of woodland creating a semi-enclosed character.’ Similarly, the Semi-enclosed Valleys and Ridges types (dark green Fig 2) covering the area around the proposed stables, with key characteristics including • strong landscape structure of hedges, trees and woodland blocks; • an intimate and enclosed patchwork landscape formed by

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				complex landform, mixed land use and strong landscape structure; • moderate to low intervisibility.

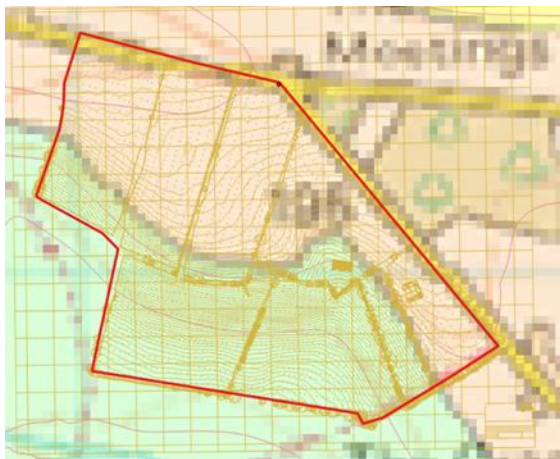


Fig 1. OWLS Landscape Types



Fig 2. 1998 West Oxfordshire LCA

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10	P8	Harm to the character of the adjoining landscape	Harm to the character of the adjoining landscape through change of land use, change of character of the site leading to loss of 'dominant sky' and reduction in tranquillity and dark night skies which would be experienced within the contextual landscape to the site. The proposed development is imposed on this rural landscape but has not evolved from the landscape. This results in an awkwardness in its relationship with its contextual landscape.	CB Parkland and estate farmland form part of the site's landscape context, sitting within the same character area. 'Dominant sky' is not a term recognised in the LVIA guidance and is not described as a key characteristic for any of the landscape character areas of types considered within the assessment. Similarly, tranquillity is not identified as a key characteristic of the types in question. To be covered by condition as required.
11	P8	Addition of inappropriate Parkland to the agricultural landscape	Parkland that is imposed onto the landscape does not replicate a desirable feature of the wider landscape but causes harm by displacing the agricultural landscape that forms an	CB See point 3 above

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			important element in the setting of those parklands that have evolved from the historic use of the landscape.	
12	P8	Harm to the setting and settlement pattern	Harm to the setting and settlement pattern of Little Tew due to the development introducing new built form and appearing to create an extension to the village on the ascending valley side through continuation of sense of enclosure that will be experienced along the lane through new tree planting.	CB The LVIA draws a conclusion that the landscape will be changed via the introduction of elements of parkland and estate farmland landscape type which occur within the wider character area but that this change will be a positive one. The estate and parkland landscape types occurring around Great Tew also exist within the setting of the village. The visual impact assessment set out in chapter 9 of the LVIA demonstrate extremely limited visibility on the north eastern side of the site, demonstrated by viewpoints 8, 15 and 16.
13	P8	Change to the rural character of the road	The rural character of the road which leads directly to Little Tew will be significantly changed by the introduction of built form of the stables and proposed gateways.	CB Glimpses of the house will be available through the gateway entrance at VPI5 shown in Appendices 3 and 4. The view of the house will be significantly screened over time by maturing landscaping and the field boundary strengthened by the planting of tree belts behind the existing hedgerow. The road will reflect other rural roads within the wider character area that travel through and past existing parkland and estate farmland.
14	P9	Removal of field hedgerow	The removal of the field hedgerow to the south of the proposed main house will remove part of the existing field pattern which otherwise remains quite intact.	CB This effect has been identified in the first row of table 2. <i>“The field pattern will be disrupted slightly in the location of the house, where the field boundary will be moved slightly to the south and delineated by a new hedgerow along the line of the Ha-ha.”</i> This has been assessed as minor adverse due to its localized nature.
15	P9	Harm to existing open, rural agricultural views ... for users of roads, footpaths and bridleways	The introduction of buildings into these existing views experienced by local visual receptors I consider to be harmful. This is because the nature of the views will be notably changed with visual receptors experiencing views of a new settled landscape which displaces the present simple and open, rural agricultural views. ...potential for creating a large magnitude of change when considered against the baseline of a simple agricultural landscape without existing built form or settlement features generally in view. This I assess will result in a high level of	CB For reasons outlined above, the development introduces an exceptional building into an exceptional planned landscape which is regarded to be a positive change.

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			change to the appearance of the landscape and result in potential significant visual harm to views enjoyed by walkers, horse riders and road users, using roads, footpaths and bridleways south, south east and south west of the site.	
16	P9	Harm to undeveloped agricultural landscape views for neighbouring properties, fundamental change to character of the landscape for neighbours	...properties such as Magpie Farm and Little Tew Grounds are located within the designed valley vista of the proposed house. These residents are likely to experience views of the proposed development features which will result in a change in the character of their views through the introduction of prominent new buildings and change of land use to parkland and gardens. Although these views are likely to be longer distance, the potential scale and nature of the changes I assess to be harmful due to the displacement of the simple and undeveloped agricultural landscape which presently forms the setting of these properties. ...there will be a fundamental change to the character of the landscape through the loss of the simple agricultural farmland which will be experienced from the driveway and access of Quarry Barn.	CB Views have not been assessed from private residences, although VP 5 is a good proxy for Magpie farm and VP 4 for Little Tew Grounds and VP 15 for Quarry Barn. Viewpoints assessed are all from points of public access where larger numbers of people (rather than private residences) will be able to experience the change. The sensitivity of likely receptors is assessed in 9.4.
17	P10	Harm to the night time character of the rural landscape	Night time lighting associated with the elevated and prominent south elevation of the main building has potential to be visually prominent in an area of existing very dark night sky. Lighting is also likely to be seen when passing the gateways including both lighting associated with the proposed buildings and from entry systems located at the gateway. This introduction of light where none is presently experienced would be harmful to the night time character of the rural landscape.	CB To be covered by condition as required.
18	P10	Harm to users of surrounding lanes/footpaths/bridleways	Harm to views experienced by lane users approaching/leaving Little Tew due to greater sense of enclosure, loss of dominant sky and introduction of built form seen from the lane. Harm to views from footpaths and bridleways south, south west and south east of the Site due to introduction of prominent new built form and parkland character landscape which displace the simple agricultural landscape presently experienced. Harm to views experienced by lane users on Green Lane south of	CB See point 13 above. The viewpoints and visualisations from the south, namely 4, 5, 12 and 13 demonstrate clearly that views (which should be from points of public access) will be really limited and highly mitigated by proposed tree planting.

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			the Site due to introduction of new built form and parkland character landscaping resulting in a loss of open agricultural character.	
19	PI0	Harm to the local landscape character – loss of the open agricultural landscape	the harm arising to the local landscape character would be moderate adverse, with a moderate major adverse effect until the landscape mitigation planting was established. The introduction of an extensive framework of new tree planting cannot mitigate the loss of the open agricultural landscape and creates in itself an adverse effect on the character of the immediately adjoining road that provides a gateway to the village of Little Tew.	CB See point 9 above
20	PI1	Adverse visual effects for users of footpaths/bridleways	I consider that visual receptors using footpaths and bridleways north of Green Lane will experience a medium to high magnitude of change. From my assessment this will result in major to moderate adverse visual residual effect after establishment of landscape mitigation. Green Lane and the lane adjacent to the Site I assess that visual effects will be moderate until mitigation measures have established and reduce to a moderate to slight adverse residual visual effect. Although visual effects would be localised, I assess them to be locally significant and harmful to the appearance of the landscape.	CB The judgement made by the LVIA is that visual receptors will experience a change from the green lane to the south of the site, demonstrated by viewpoints 11, 12 and 13. Table 5 clearly describes the visual effect and how it will change over time. It identifies that visual receptors in this location will likely to be highly sensitive to the change but that (linked to the beneficial change identified in the landscape impact assessment), the change will overall be a beneficial one.
21	PI1	Harm to local landscape character	Harm identified exceeds the threshold of acceptable harm when considered in the context of both national and local landscape policy. Although the landscape is without designation, the medium high sensitivity of the local landscape character is because of its distinctive rural characteristics and its importance to the setting of the dispersed but historic pattern of settlement.	CB The LVIA identifies overall positive and beneficial effects of landscape change. Landscapes cannot be preserved in aspic and are often subject to decisions regarding landscape change and the acceptability (or otherwise) of that change.
22	PI1	Change to character of the countryside across the site	The application proposals fundamentally change the character of the countryside across the Site and to a lesser extent to the contextual local landscape. The proposals do not enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside but impose a new landscape onto the underlying landscape.	CB See 21 above.
23	PI1	Not compliant with Policy	Policy EH2: It is my opinion that the loss of rural openness	CB The conclusions of the LVIA summarises in section 10,

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		EH2: Loss of rural openness and introduction of activity/light to the site	cannot be mitigated through the planting of a substantial tree framework. I therefore consider that the application proposals conflict with this policy. The introduction of activity and light to the Site through the large scale nature of the proposal clearly conflicts with this element of the policy in my opinion.	demonstrates that there is a change to character but that the change will be a positive one, with the introduction of valued elements from the Parkland and Estate Farmland landscape types found within the Character Area. The design of the house and the landscape strategy seeks to strengthen these valued characteristics. The LVIA also examines attributes of existing character found on the site and judges the effects on these characteristics to be minor, and in many case beneficial, since the landscape strategy seeks to address the issues of poor condition of these attributes and deliver on the landscape strategies outlined for the existing landscape character types on site. From a visual perspective, views of the house will be localized and of the stables, negligible, since the landscape strategy aims to rest the built form within a well treed landscape. Despite this, and linked to the conclusions of the landscape assessment, limited residual views of the exceptionally designed new estate house within its planned landscape will be beneficial. In line with the conclusions, the proposal accords with policy EH2 in that it is an overall beneficial change linked to culturally valuable landscape types found within the landscape setting of the application site. In addition, the landscape strategy seeks to enhance character, tranquility, visual amenity and biodiversity by strengthening field boundaries, enhancing pastures, reverting intensive arable to species-rich pasture, introducing natural water features and introducing a significant number of mature trees. Suggested to be covered by condition.

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1	P3	Risk from the development	significant risk to the SSSI both during the construction and operational phases. the development will impact the quality and quantity of water draining to the SSSI. Key impacts are the increased surface runoff during construction, increased erosion and contamination during construction, increased surface runoff from the developed site, a reduction of water issuing in springs at the SSSI following development, risk of breaching and overtopping a proposed lake, risk of contamination from sewage effluent from the developed site.	DL A construction management plan will be submitted prior to construction, including temporary measures for managing and treating run-off from the site during construction. There is sufficient space on site to provide Sustainable Drainage Systems for collection of silt and contaminants and for controlling the surface water from the site. A surface water drainage strategy has been submitted with the planning application providing information for the proposed SUDS and flow control measures. The proposals will control surface water from the proposed development, mimicking pre-development conditions. Furthermore, the proposed SUDS will treat surface water from the site before discharging into the river. The surface water drainage strategy states that gravel surfaces will form the access road and several paths, allowing water to infiltrate into the ground and mimicking natural conditions. The proposed building will be constructed in an area where Whitby Mudstone forms the bedrock geology. This stratum has a very low permeability and therefore its contribution to the catchment is more by surface water than baseflow. The surface water from the new building will mimic existing conditions. The proposed SuDS and flow control device will further treat and regulate the flows from this area. No embankments or other above ground retaining structures are proposed for the pond. The pond will be constructed below the existing ground level. Therefore, the risk of a breach is low. An overflow can be provided to mitigate the risk of overtopping. Details will be provided in the detail design and can be shared with the LPA. A planning condition for the development's drainage proposals is expected for this development.
2	P3	Missing documentation	a very brief drainage strategy which is missing required details and should be rejected by the LPA. Missing documents include	DL The Environment Agency's maps show that the site is at low risk of flooding from watercourses, surface water and

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			a flood risk assessment, foul water management plan, contaminated water management plan, hydrological impact assessment on the SSSI, and a lake design and geotechnical assessment.	reservoirs. Thames Water’s sewer records show that there are no sewers at this location and therefore the flood risk from sewers is low. The site’s geology shows that the risk of flooding from groundwater is also low. Therefore, a surface water strategy is sufficient for this development, aiming to provide sustainable drainage systems to control run-off from the site to the existing rates. The proposals are for the construction of a single residential property. CIRIA’s SUDS Manual, Table 26.2 shows that the pollution hazard level from residential roofs and driveways is “very low” and “low” respectively. Furthermore, SuDS are provided in the drainage strategy which will provide further treatment. A CTMP will be submitted to the LPA prior to construction, providing measures for surface water management during construction. As mentioned in No 1, a planning condition is expected for the drainage system. The findings from the geotechnical assessment and the pond’s design will be included in the supporting documents for the planning condition.
3	PI4	Impacts from the Proposed Development	the development site is within the River Dorn catchment and upslope of the Little Tew SSSI, any activity at the development site will impact on the quantity and quality of water which drains from these upslope areas to the River Dorn at the SSSI	DL As explained above, the run-off from the proposed development will mimic existing conditions. The pollution hazard from the proposed development is “Very Low” – “Low”. SuDS are provided in the drainage strategy, aiming to further improve the quality of the water.
4	PI5	Impacts during Constructional phase	- increased surface runoff from vehicle traffic compacting the soil; - erosion from bare earth surfaces and spoil heaps; - contamination from hazardous materials stored on site; - contamination from vehicle washing activities; - increased surface runoff from areas of temporary accommodation;	DL A drainage strategy will be provided in the CTMP including measures for controlling and treating surface water from the site. There is sufficient space on site to incorporate SUDS and other measures to control and manage surface water.
5	PI5	Impacts during Operational phase	increased surface runoff from building roofs access roads and areas of hardstanding;	DL There will be no increase in run-off as explained in No 1. The effluent from the proposed development is domestic. A

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			- contamination from waste water; - pollution from managed areas of grounds receiving fertilisers and pesticides; - risk of overtopping or bank collapse of the proposed lake;	sewage treatment system will be provided. Drainage fields are also proposed to further increase the factor of safety. Arguably the site's conversion from arable farmland to a residential property will reduce the risk of contamination from fertilisers and pesticides. Furthermore, the introduction of swales and a pond will further improve the quality of the water in comparison with the existing situation. Similar techniques have been recently used in the River Dorn to improve the quality of the water and reduce the flood risk. Therefore, the proposals are in line with techniques that Natural England have been using to control flooding and improve the quality of the water in the River Dorn. The risk of bank collapse and overtopping is low as explained in No 1.
6	P15/P16	Flood Risk Assessment	The drainage strategy refers to a preliminary flood risk assessment prepared by Price and Myers, but this is not available on the West Oxfordshire Planning Portal. A flood risk assessment is required for any development > 1ha in size, in accordance with the current government guidelines (Environment Agency, 2014). it is expected that a flood risk assessment for the site would be a detailed document assessing the risk of flooding from all sources including evidence of historical flooding at the site.	DL As explained in No 2 the flood risk from all sources is low. A drainage strategy was submitted with the planning application assessing the flood risk from surface water and providing measures to control run-off from the site.
7	P16	Drainage strategy very brief	The drainage strategy is very brief and is missing some of the basic information expected for the management of surface water namely: - Estimates of the design rainfall at the site; - Estimates of the 100-year greenfield flow from the undeveloped site; - Estimates of the 100-year design flow at the site including an allowance for climate change; - Calculations showing the required attenuation storage to ensure the flow from the developed site does not exceed the greenfield flow;	DL A detailed assessment is absolutely fundamental for site's with a restricted space for SuDS and where connections to the sewer infrastructure could be problematic. However, this is not the case for this development. The drainage strategy provides information for the proposed SuDS and the flow control methods that will be used to control run-off from the new development. Furthermore, preliminary calculations are provided in the drainage strategy. A planning condition for the surface water drainage system is expected. A detailed design and supporting documents will be submitted to the LPA to enable them to discharge the planning condition.

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			Detailed descriptions and justification of the proposed measures for achieving a sustainable drainage system (SUDS) design The drainage strategy report gives output from some drainage software (Flow+, Causeway Technologies Ltd), but this is not explained, and the actual input rainfall values are not listed so the authenticity of the estimates cannot be checked.	
8	PI6	Drainage strategy, purpose of swale	The purpose of a swale is a low shallow ditch to provide temporary storage of surface water as it slowly percolates into the soil or is lost through evaporation. It is not a means of conveying water from one location to another, so having it feeding the pond is misleading.	DL The description of the swale in Water Resource Associates' report is a personal opinion rather than a description that has been borrowed by relevant documents on SuDS. CIRIA's SuDS Manual, Section 17.1 describes swales as "shallow, flat bottomed, vegetated open channels designed to convey, treat and often attenuate surface water runoff". Furthermore, Section 17.1.1 states that "the conveyance swale is a shallow vegetated channel. These are particularly effective ways of collecting and conveying runoff from the drained area to another stage of the SuDS Management Train". It is therefore questionable whether the Water Resource Associates' report is based on personal opinions or relevant design standards and policies.
9	PI6	Impact/mitigation measures during construction/operation phases	In addition to the drainage strategy other documents should be submitted which include an assessment of the potential impact on the SSSI and mitigation measures covering the potential contamination during the construction and operation phases.	DL A CTMP will be submitted to the LPA for approval prior to construction. Refer to No 1.
10	PI6	Foul water management plan required	The drainage strategy mentions that a sewage treatment works will be constructed on site, but no details are given about what this will include, and a separate foul water management plan should be submitted as part of the application.	DL A planning condition for the proposed drainage system is expected for this development. Details will be provided in the reserve matters application.
11	PI7	Impact of sediment erosion during construction	The potential impact of sediment erosion during the construction phase should also be covered in detail by a separate report including the application of water quality modelling to assess the potential sediment loads which could impact on the SSSI.	DL A CTMP will be submitted to the LPA for approval prior to construction. Refer to No 1.
12	PI7	Detailed report	A report should be included which contains details on the lake	DL Details will be provided in the reserve matters

LITTLE TEW – REVIEW OF OBJECTION COMMENTS
LEAD PROFESSIONAL(S) RESPONSES – 28 OCTOBER 2024

No	Page	Objection	Objection Detail	Applicant Response
WATER RESOURCE ASSOCIATES – Review of the impact of the proposed development at Little Tew, Oxfordshire on the Little Tew SSSI				
		required on lake – design/water balance/impact/bank construction	design, the lake water balance and impacts on SSSI hydrology, and geotechnical details on the lake bank construction to prevent an embankment breach.	application.
13	PI7/18	Missing reports	• Flood risk Assessment • Surface Water Management Plan and SUDS Design • Foul Water Management Plan • Contaminated Water Management Plan (during construction) • Hydrological Impact Assessment (for the SSSI) • Lake Design and Geotechnical Assessment	DL The drainage strategy that was submitted with the planning application addresses the flood risk from the proposed surface water drainage system and the hydrological impact on the SSSI. Details for all other points will be provided in the documentations for the reserved matters application.
14	PI8	Environmental Impact Assessment (EIA) required	Given the size and extent of the development and its proximity to the SSSI, these reports could all be combined in an Environmental Impact Assessment (EIA) which makes a proper assessment of all of the risks associated with the development, their impact on the SSSI and the wider environment	DL This is a personal opinion, as an EIA was not requested by the LPA for this planning application.