

Planning Department
South Oxfordshire District Council
Abbey House,
Abbey Close,
Abingdon,
OX14 3JE

12.09.25

Dear Sir/Madam,

**Response to SODC – Planning Application Ref: P25/S1653/FUL
Proposed Waste Vehicle Depot, Haseley Trading Estate**

The Parish Councils listed below, and many residents we represent, remain firmly opposed to this application. Having already set out our detailed objections, this letter builds upon that with additional points that highlight key gaps in the applicant's evidence and in the Council's handling of the process.

1. Site Selection & Transparency (STRAT policies; NPPF para 84)

We originally submitted a Freedom of Information request which the Council determined under the Environmental Information Regulations (EIR). While confirming that other sites had been considered, the Council refused to release details, citing commercial and Cabinet confidentiality.

This lack of transparency is unacceptable. South Oxfordshire District Council is both the applicant and the determining authority. Councillors are being asked to approve a scheme without being allowed to see the evidence base for the location. That is not compatible with the EIR presumption in favour of disclosure, nor with principles of fairness in planning decision-making.

Until a transparent and robust site selection assessment is published, the application cannot demonstrate compliance with STRAT1/STRAT5 of the Local Plan or NPPF paragraph 84.

2. Highways & Safety (TRANS5; NPPF para 111)

The applicant relies heavily on the absence of objection from the Highways Authority. However, this is not determinative. Their assessment has focused narrowly on junction capacity and visibility splays, and has not considered the lived realities of vulnerable road users in Little Milton and neighbouring villages.

The A329 through Little Milton is narrow and constrained, with no pavements for large sections. Pedestrians, children walking to school, and cyclists are forced to share the carriageway with vehicles in certain areas. Introducing over 100 HGV movements per day, many of them concentrated in convoy-style departures before 6:00am, represents a

fundamentally different and more dangerous profile of highway use compared with the former Countax/Ariens operations.

Furthermore, South Oxfordshire District Council's own planning officers previously emphasised that **“the potential impact of this proposal on Little Milton is a key consideration that must be assessed as part of any future transport submission,”** specifically referencing ongoing local concern about HGVs using the A329 given its narrow width and constrained layout. Despite this explicit requirement, the applicant's original and amended submissions **completely fail to address** the impacts on Little Milton or to propose any mitigation measures. Ignoring a specific consideration raised by planning officers undermines the integrity of the process and demonstrates a failure to provide the required transport evidence. This omission alone provides ample grounds for refusal on highways safety policy grounds.

In addition to the early morning convoy, it must be noted that every vehicle leaving the site in the morning also returns in the afternoon. These return trips will coincide with the school run and peak pedestrian use of village roads. In Little Milton this means refuse lorries will pass the primary school and bus stops precisely at the time children are walking home. This compounds the danger and underlines that the scheme does not provide “safe and suitable access for all users.” This also coincides with Le Manoir's afternoon check in times and will increase the danger associated with the new entrance to be built off the A329, yards from the Great Haseley turnoff.

These concerns are strongly echoed by our local MP for Henley, Freddie van Mierlo, who has long campaigned to reduce HGV traffic through Little Milton. In his letter to David Rouane on the 21st July 2025 regarding this application he wrote that:

“Residents are understandably anxious about the impact increased HGV movements associated with this proposed development could have on road safety, pollution, character of the area, and resident wellbeing.”

He further warned that:

“The local roads in villages such as Little Milton are ill-suited to increased HGV traffic, particularly at certain pinch points and passing by the village school.”

He urged that any permission must include robust conditions to route vehicles via the strategic road network, stressing that:

“The council should avoid putting a price on the safety and wellbeing of rural villages.”

For councillors, the choice is stark: either stand by national and local policy and protect the safety of residents, or accept daily HGV convoys (and increased car travel to this site) through an unsafe village environment. On highways grounds alone, this application should be refused.

3. Odour & Air Quality (DES6; ENV9)

The applicant asserts that odour will be negligible because vehicles return “empty.” In practice, refuse collection vehicles carry residual waste matter, liquids and odours even when unloaded. No quantified Odour Risk Assessment has been submitted, with the matter instead deferred to a future management plan. This is contrary to DES6 and ENV9, which require impacts to be assessed at application stage.

The applicant also relies heavily on Culham’s record of minimal complaints, but this is not a valid comparison. Culham is located within a remote science and industrial park with direct access to the A415/A34, far from sensitive receptors. By contrast, Haseley is surrounded by small villages, schools and tourism businesses, with HGVs routed through rural lanes. The fact that Culham operated without issue does not prove that Haseley will do the same.

No Air Quality Assessment has been undertaken, despite the fact that relocation will generate additional HGV mileage compared with Culham, increasing emissions of CO₂, NO_x and particulates. This omission is a further failure against ENV9.

4. Flooding & Pollution (ENV8; NPPF para 167)

The applicant’s response relies almost entirely on the fact that the Lead Local Flood Authority (LLFA) and Thames Water have not objected. However, this does not resolve the substantive risks, nor does it demonstrate compliance with policy. Consultees often rely on the applicant’s submitted Flood Risk Assessment at face value, but that does not remove the Council’s responsibility to interrogate whether the evidence is adequate. In this case, it is not.

The Flood Risk Assessment itself acknowledges that the site already suffers from surface water flooding, particularly in the car park area. The planners’ rebuttal does not explain how these risks will be mitigated once the site is repurposed as a large-scale vehicle depot with extensive hard surfacing, regular washing of vehicles, and additional impermeable areas. Simply stating that the LLFA has not objected ignores the fact that increased impermeable coverage, combined with climate change rainfall allowances, is likely to worsen run-off risks.

Crucially, the applicant’s position is also at odds with clear and well-documented local evidence in Little Milton. The Thames Water statement implies that the network and pumping station can accommodate additional load, but this is simply not borne out by reality on the ground. The brook adjacent to the pumping station suffers from **frequent sewage discharges** caused by the existing system being overwhelmed, and the surrounding area has suffered **severe flooding** both last year and again this year. In fact, the road near the pumping station has been **closed for several weeks** while Thames Water attempts emergency works to patch up a system that is already failing. It is therefore wholly unacceptable for the applicant to rely on a simplistic “no objection” from Thames Water when **recent, visible, and repeated failures** show that the local network cannot cope even with existing demand.

Ignoring this evidence places further pressure on already failing infrastructure and increases the risk of pollution incidents.

The application fails to deal at all with the risk of contaminated run-off and washwater pollution. Refuse and cleansing vehicles, even when “empty,” generate oily residues, leachate, and detergents during routine washing and yard operations. This polluted water cannot be allowed to discharge untreated into the drainage system. The planners’ rebuttal completely ignores this issue, even though it is a well-known environmental risk from waste fleet depots across the country.

Policy ENV8 requires development to demonstrate that it will not increase flood risk elsewhere and that it will protect the water environment. NPPF paragraph 167 is explicit that planning decisions should ensure flood risk is not increased from any source and that residual risks are properly managed. Neither test is met here. No sustainable drainage (SuDS) strategy has been provided to show that contaminated water will be safely captured, treated, and monitored before discharge. Nor has any condition been proposed that could realistically secure this — because this is a fundamental design issue, not a minor detail.

In short, the applicant’s rebuttal amounts to “no consultee objection, therefore no problem.” This is not good enough. The application still fails to demonstrate how flood risk will be mitigated or how polluted run-off will be prevented. The absence of objection from consultees cannot substitute for the applicant’s own duty to prove compliance with ENV8 and NPPF 167. On this basis, refusal is justified.

5. Rural Economy & Tourism (NPPF para 84)

The application has not assessed the impact on the rural economy or tourism sector. Businesses such as Le Manoir aux Quat’Saisons, which depend on the tranquillity and quality of the local environment, are particularly vulnerable to the intrusion of an industrial-scale depot.

It is not enough for the applicant to dismiss objections as “unsupported.” The burden lies with the developer to demonstrate that no unacceptable harm will occur to local businesses or the wider rural economy. Until this assessment is made, the application fails to meet NPPF paragraph 84 or the Local Plan’s objectives for a strong and diverse rural economy.

6. Landscape, Lighting & Biodiversity (ENV1, ENV3, ENV4)

The applicant’s rebuttal reduces landscape and ecological impacts to a narrow point about bat lighting. This misses the wider picture. The site is located in open countryside, where dark skies and rural character are an integral part of amenity and landscape value. The introduction of an industrial-scale waste depot with extensive external lighting, high-mast columns, and all-night vehicle activity will fundamentally alter the rural landscape. Addressing bat corridors alone does not address the wider visual and amenity harm.

The application also fails to consider skyglow and light trespass. Local villages currently enjoy a dark rural environment, which is highly sensitive to new lighting. The planners' rebuttal does not acknowledge this, nor has any lighting impact assessment been carried out for residential receptors or the wider landscape. This omission is a clear failure to comply with ENV1 and ENV3, which require development to respect local character and minimise light pollution.

On biodiversity, the application still provides no clear strategy to deliver the statutory 10% biodiversity net gain (BNG) now required for all major developments under the Environment Act 2021. The rebuttal does not explain how BNG will be achieved, measured, or monitored. This is not a minor technicality; it is a legal requirement. Reliance on vague landscaping proposals is inadequate without a quantified metric assessment demonstrating net gain.

Finally, the applicant downplays the impact of tree loss and boundary changes. The removal of established vegetation and the industrialisation of the site edges will increase visual exposure of the depot to the wider landscape, particularly from nearby villages and public rights of way. No LVIA (Landscape and Visual Impact Assessment) has been submitted, despite the scale of change. This leaves councillors without the evidence needed to judge the proposal's true impact on landscape character.

In short, the rebuttal selectively addresses a single ecological point while ignoring the wider and more significant issues of light pollution, rural character, tree loss and biodiversity net gain. The application therefore fails to comply with ENV1, ENV3 and ENV4, and should be refused on these grounds.

In Conclusion

This application is unsustainable, unjustified and incomplete. The proposed depot would bring unacceptable harm to highway safety, residential amenity, environmental quality and the rural economy, while being advanced through a process that has lacked both transparency and fairness.

For decades our communities have lived alongside the former Countax / Ariens operations at Haseley in relative harmony. That was a well-managed neighbour which, although active, caused little disturbance to residents. What is now proposed is of a wholly different character, introducing large-scale HGV activity, increased traffic flow and external operations into a sensitive rural setting.

South Oxfordshire District Council has known for at least seven years that it would lose the use of the Culham site, yet it has failed to secure even a shortlist of better-suited alternatives. As a result, our communities are now being told this unsuitable site must go ahead simply because no contingency plan was made. That is not sound planning – it is a failure of foresight and strategy, especially on a matter as fundamental as waste management.

For development of this scale, affecting so many rural villages, the “last resort” approach is wholly unacceptable. These concerns are not just ours; they have also been recognised by our

local MP, Freddie van Mierlo, who has warned that the safety and wellbeing of rural villages must not be compromised in this way.

The correct outcome, consistent with the South Oxfordshire Local Plan and the NPPF, is refusal in line with national policy requiring development to avoid significant harm where mitigation is absent.

Yours faithfully,

Stephen Harrod - Chair - Great Milton Parish Council

Francois Van der Merwe - Chair - Little Milton Parish Council

Richard Sheehan - Chair - Great Haseley Parish Council

Neil Fitzgerald - Chair - Stadhampton Parish Council