# LOCAL PLAN 2031 – SAFEGUARDING OF LAND FOR THE SOUTHERN ABINGDON BYPASS.

### 1.Introduction

The Local Plan 2031 includes a policy ('Core Policy 11') for the safeguarding of land for the possible future development of an Abingdon Southern Bypass and a second Thames crossing (hereafter referred to as 'the proposal') to the west of Culham.

In the short and medium term, the proposal would result in the blighting of land within Culham and the imposition of stress to residents who are concerned by the environmental and social impacts associated with the construction and long-term operation of the proposed Bypass and Second Thames crossing. In the longer term, during the possible construction and operation of the proposed Bypass and Second Thames crossing, the development would result in significant adverse environmental impacts to:

- the various and numerous users, and setting, of the River Thames;
- the residents and resources of Culham village.

The proposal would also increase flood risk within the wider area as it would result in the direct occupation of land within the floodplain.

The Local Plan includes no details of the need case for the proposal. In addition, there is no information regarding potential alternative schemes or routes. The lack of a need case, and the absence of consideration of potential alternatives, significantly undermines the rationale for the proposed safeguarding of land.

The concerns relating to the proposals are set out below.

# 2. Absence of a Transparent Need Case

The rationale for the proposal is set out in Paragraph 5.34 in Chapter 5 of the Local Plan, as follows:

'5.34. ...a potential long term approach to alleviating traffic congestion to the south of Abingdon on-Thames is the provision of a new southern bypass, including a second Thames crossing. Additional development to the south of Abingdon-on-Thames is inappropriate without the provision of this new bypass'.

This is implemented via Core Policy 12 which states the following.

'Land is safeguarded to support the delivery of the following identified transport schemes:

• South Abingdon-on-Thames Bypass linking the A415 to the West and South East of the town including a new River Thames crossing

• Diamond Interchange at the A34 Lodge Hill Junction.

New development in these areas should be carefully designed having regard to matters such as building layout, noise insulation, landscaping and means of access.

Any proposals for development that may reasonably be considered to impact the delivery of the identified schemes (as shown by maps in Appendix E and the Adopted Policies Map)\* should demonstrate the proposal would not harm their delivery.

Planning permission will not be granted for development that would prejudice the construction or effective operation of the transport schemes listed above'.

There is no detailed and transparent supporting information provided to justify the need for the proposal. In particular, there is no quantification of existing or future traffic levels. In addition, there is no information provided about the likely level of investment required to facilitate the development of the proposal or the associated benefits including reductions in journey times.

Further, the alleged need for the proposal, as set out in the Local Plan 2031, is in direct conflict with the information presented in Oxfordshire Local Transport Plan 2011-2030 (revised April 2012). This states that the proposal comprises:

'a major infrastructure project(s) that would require significant financial investment. Given that the scheme(s) are of local benefit rather than strategic importance'..it is ..'unlikely to gain funding from central government. Furthermore, the level of development planned for the town would not generate sufficient developer funding to cover the very substantial costs'.

In the Oxfordshire Local Transport Plan, Oxfordshire County Council proposes a range of alternative measures including junction improvements, where appropriate.

Conclusion: Given the lack of a transparent need case for the proposal, it is not appropriate to safeguard land for an unjustified scheme for at least the next 15 years.

#### 3. Consideration of Alternatives

As part of the development of a need case, it is necessary to consider a range of alternatives. This would include, but not be limited to, potential alternatives routes for a Bypass and Second Thames crossing together with less intrusive alternatives such as the promotion of more sustainable (and cheaper) alternatives such as the promotion of pubic transport schemes and the planning of new developments that reduce the need for travelling by car.

<sup>&</sup>lt;sup>1</sup> Oxfordshire Local Transport Plan 2011-2030. Revised April 2012. Chapter 14-Abingdon-on-Thames Area Strategy. Paragraphs 14.25 and 14.26.

No detailed and transparent information regarding alternatives is presented in the Local Plan, thereby undermining the need case for the proposed development and the associated safeguarding of land.

In addition, any future analysis of alternatives would be undermined by the safeguarding of a selected route in the Local Plan.

Conclusion: Given the absence of a detailed and transparent review of alternatives to the proposal, it is not appropriate to safeguard land for an unjustified scheme for at least the next 15 years.

# 4. Unsuitability of the Safeguarded Land for the Proposal

#### 4.1 Overview

The safeguarded land within the vicinity of the River Thames is considered to be unsuitable for the construction and operation of the proposal due to the significant planning constraints and environmental sensitivities associated with this area, as set out below.

#### 4.2 The River Thames

The River Thames, to the south of Abingdon, is a key recreational and commercial resource. The watercourse and adjacent terrestrial habitats are of significant nature conservation interest and support diverse populations of communities and species. The Thames Path is used for informal recreation by numerous local stakeholders and visitors to Abingdon from the wider area. The waterway is well used for rowing (for example, by Abingdon Rowing Club and Abingdon School) and by recreational boat users. It is also used by anglers.

The proposal would have a significant impact on the setting of the River Thames during both the construction of the bypass and associated Thames crossing and in the long term as a result of the operation of the bypass. Key impacts would include landscape and visual impacts, and noise and dust generation. There is the potential for impacts on water quality particularly during the construction phase but also during the long-term operational phase as a result of the discharge of contaminated run-off. These impacts would have a significant adverse effect on the use of the Thames Path and the waterway by recreational users.

Conclusion: the safeguarded land within the vicinity of the River Thames is a key recreational, ecological and landscape resource. Due to the sensitivity of the existing environment within the vicinity of the River Thames, it is unsuitable for the construction and long term operation of a Bypass and Second Thames crossing. The majority of potential environmental impacts would not be amenable to mitigation.

#### 4.3 Oxford Greenbelt

The proposal would result in the permanent loss of land within the Oxford Greenbelt.

The purpose of the Oxford Green Belt in the Vale district is to prevent urban sprawl by keeping the land permanently open and to preserve the setting and special character of Oxford.

The proposal would have an unacceptable impact on the Oxford Greenbelt within the vicinity of the River Thames and the village of Culham. In particular, the proposal would have a significant, irreversible and permanent impact on the landscape. This is contrary to Core Policy 9 in the Local Plan

Conclusion: the proposed safeguarded land within the vicinity of Culham is a key part of the Oxford Greenbelt and is therefore unsuitable for the development and long term operation of a Bypass and Second Thames crossing.

#### 4.4 Flood Risk

The proposed development would result in the loss of land that is currently used for flood management. The loss of this land could result in an increase in flood risk to properties both within Abingdon and downstream at the villages of Culham and Sutton Courtenay.

In particular, the proposals would affect land to the west of the village of Culham which is regularly subject to flooding and is designated as follows within the Strategic Flood Assessment (March 2009):

- Flood Zone 2;
- Flood Zone 3.

Planning Policy Statement 25<sup>2</sup> states that Local Planning Authorities allocating land in local plans should 'demonstrate that there are no reasonably available sites in areas with a lower probability of flooding that would be appropriate to the type of development or land use proposed'.

'In areas at risk of river or sea flooding, preference should be given to locating new development in Flood Zone 1'.

As noted previously, no information has been provided about potential alternative routes including those at lower risk of flooding.

Conclusion: the safeguarded land within the vicinity of Culham has a very high risk of flooding and is therefore unsuitable for the development and long term operation of a Bypass and Second Thames crossing.

<sup>&</sup>lt;sup>2</sup> Planning Policy Statement 25. Development and Flood Risk. December 2006. TSO.

# 4.5 Cumulative Impacts on the Residents and Resources of Culham Village

The proposed development would result in significant cumulative impacts to the residents and resources of Culham village as a result of the following direct and indirect impacts.

- Disturbance as a result of increased noise levels associated with both the construction phase and the long-term traffic movements.
- Impacts to human health as a result of the deterioration in local air quality associated with the emissions from additional traffic movements and their closer proximity. Residents with existing health issues, notably asthma, will be most sensitive to the deterioration in air quality associated with the proposals.
- Direct impacts to the setting of a number of properties of historic and architectural value.

In addition, over the next 15 or so years, as a result of the safeguarding of land, there will be considerable stress caused to the residents as a result of the inclusion of proposals within the local plan and the associated blighting of land.

Conclusion: the proposal will have a disproportionate and unacceptable cumulative impact on the residents of Culham village. It is inappropriate to include the proposal within the Local Plan as it would result in the blighting of land and the imposition of stress for the local residents, particularly given the speculative nature of the proposal.

## 5. Summary

The lack of a transparent need case for the proposal undermines the argument for safeguarding land for an unjustified development. The absence of a consideration of alternatives, including more sustainable solutions, further undermines the proposed safeguarding of land for at least the next 15 years. There are significant technical considerations that would prevent the construction and operation of a Bypass and Second Thames crossing within the vicinity of Culham village as follows:

- direct impacts on the floodplain to the south of Abingdon with an associated increase in flood risk within Abingdon and the surrounding villages;
- direct and indirect impacts on the Oxford Greenbelt as a result of landtake and significant direct and indirect landscape and visual impacts;
- direct and indirect impacts on the users of the Thames path and watercourse as a result of landscape and visual impacts and noise disturbance;

- direct and indirect impacts on the landscape and nature conservation value of the River Thames and associated terrestrial habitats;
- significant and disproportionate cumulative impacts on the residents of Culham village as a result of the noise and air quality impacts.

Overall conclusion: the safeguarded land must be deleted from the Local Plan 2031.