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working locally and nationally to
protect and enhance a beautiful,
thriving countryside for everyone to
value and enjoy

Vale of White Horse Local Plan Part 2

CPRE Oxfordshire Hearing Statement - MATTER 1 - Duty to Co-operate and other legal requirements

1.1 What are the strategic matters relevant to the LPP2 and which other authorities/organisations are affected?

As we stated in our submission, by far the largest strategic matter affecting the Vale (and the rest of the Arc of which Oxfordshire is a part) is the Oxford-Cambridge Growth Corridor plan, and its associated rail links and Expressway.

The Corridor Growth Plan intends to more than double both the housing stock and the population of the County, concentrating on “hi-tech” areas notably in the Vale, between 2031 and 2050. The Vale itself asked the Government last year to route the Expressway South of Oxford in order to unlock and facilitate development.

Although the exponential growth is proposed to begin the year this plan ends, the Corridor is to be chosen this July (indeed may already have been announced before this hearing), the development of rail is in progress, and the Expressway works could commence in three years with a view to opening to traffic within the Vale Plan period in 2030.

This widely publicised Growth Corridor Plan is already a major influence on business and development decision making, on land prices as developers seek to option all land that may be involved, and as blight settles on potentially affected areas across a wide swathe of the County from now until 2030, all effects which will increase over the next few years, and throughout this plan period.

However, this massive and transformative development, with wide ranging and immediate implications, receives only a passing mention in para 2.126, and the Vale intends in proposed modification AMD9 to tone down even that, removing for instance the reference to route options whilst still failing to state that the District itself had been closely involved and in its “final” letter (See Appendix 1) confirmed preference for a Southern route citing inter alia the potential to unlock the 4,000 extra houses at Dalton Barracks. The District’s preferred route would incidentally be

a brand new road slicing through the countryside and Green Belt, which the LP2 refers to by saying merely that *depending on the route chosen there COULD BE environmental impacts*.

The Ox Cam corridor and its transformative intent should be at the forefront of this plan, not consigned to an opaque footnote.

The plan is therefore unsound, and it is unsound also that the public has not been made aware during the consultations of the magnitude of the scheme, and the Districts' involvement in its development.

1.6 Has the preparation of the LPP2 complied with the Statement of Community Involvement?

No. The essential ingredient of community involvement is that the public is made aware of the background behind the proposals on which its involvement is sought. There have been multiple failures of transparency across the Plan.

- i. As rehearsed under 1.1 there has been a failure to openly lay out and assess the impacts, development implications and environmental harm the Growth Corridor Scheme and Expressway would have on the District and its neighbours - particularly as there is no mention of the fact that the District itself is proposing one of the more environmentally damaging alternatives for the Expressway route. Given the magnitude and implications of the Growth scheme we consider that this one issue may be capable of making the plan unsound.
- ii. The Executive Summary at Page 10 refers to the plan consisting of *policies and locations for the new housing to meet the Vale's proportion of Oxford's housing need, which cannot be met within the City boundaries*. (our underlining) This statement is not simply misleading, but incorrect, since there is no evidence at all in this plan or elsewhere that Oxford's housing need (itself a disputed figure) could not be met within the City boundaries. To the contrary, CPRE has provided detailed evidence that it could. Whilst the detail is for a later session it is relevant here because the public would obviously view differently a situation where they are told that a need exists and can only be provided within the Vale to a more accurate statement that Oxford declines to address its population's needs within the City and seeks instead to force them upon its neighbours through (in our view) a misuse of the Duty to Co-operate, not just by the City but by the Growth Board and the District Councils which are members of it.
- iii. The public are not advised that the intention of Part 1 and Part 2 combined is to provide 1,300 more houses than the SHMA, itself inflated by double counting, requires, and which is now further undermined by lower population forecasts. Nor that following sustained criticism from CPRE, the SHMA methodology has been abandoned by Government which has substituted a new OAN (Objectively Assessed Need) formula which would reduce the Vale requirement by 8,000 houses as well as deleting Oxford's unmet need entirely. Passing off all these figures as "need", without qualification, is effectively to mislead the public of the basis on which they are being consulted, and thereby invalidate public responses, especially in that the Vale could have opted to base its plan on the new lower numbers but decided not to do so.
- iv. Nor does the Consultation Plan advise the public of, or even mention, the Growth Deal, which is in fact the proximate motivation for the inflated

figures. In the Growth Deal, Oxfordshire's Councils agree with the Government to provide 100,000 houses in Oxfordshire in exchange for infrastructure funding. The Growth Deal itself at para 25 recognises this figure as *significantly in excess of the Local Housing Need figures set out in the Government consultation paper 'Planning for the right homes in the right places' (DCLG September 2017)*. This makes it clear that the Government itself sees the 100,000 houses (of which this Plan provides a part) as optional and not enforceable.

Each of these issues is fundamental to the numbers in the Plan and to the public's understanding of the strategies proposed. The Public were not properly alerted (or alerted at all) to the relevant facts in their consideration of the Plan numbers and policies, and consequently the public consultation has fallen far short of the standard required. The Vale's SCI states that *We want our plan-making to fully consider and take account of community views*, but a pre-requisite for that is that the public are fully and proactively informed of the facts and issues that lie behind it in order to be able to properly consider them.

We submit that it is also unsound, because it is not conducive to the proper planning of the area. Housing figures so far in excess of objectively assessed need should not be planned, for two reasons:

- Sites are unnecessarily allocated whose loss will be most damaging, e.g. as in this plan Green Belt and Area of Outstanding Natural Beauty which, without phasing, developers will inevitably choose first.
- It is a recipe for falling short of five year supply and thereby opening the District to predatory development putting at risk even more valued sites.

Neighbouring South Oxfordshire District Council is asking Government for a two year reprieve from compliance with the Growth Deal whilst it reassesses its own Plan.

It is our recommendation that this Plan should be deferred on the evidence we have given, providing the Vale with a chance to review and to re-present the Plan, on the new OAN figures and with a realistic and evidenced assessment of any unmet need Oxford may have.

APPENDIX 1

Vale of White Horse District Council's response to Highways England on Expressway Corridors, April 2018

Planning

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Our reference: OxCamCorridorsCons/VOWH

12 April 2018

Dear Oxford to Cambridge Expressway Stakeholder Team

Stakeholder Engagement on Expressway Corridors

Please find attached written feedback from Vale of White Horse District Council (VOWH) to your e-mail of 23 February asking for views on the currently identified Expressway Corridors.

The full response and rationale is set out below, but in summary I would note that the current preference of VOWH is for **Road Option A** in association with **Oxford Sub-Option 4**.

The Council is not generally supportive of **Road Option B or C**, particularly if this is linked to the **Oxford Sub-Option S1** routing to the north and west of Oxford.

Yours sincerely

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Head of Planning

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Oxford to Cambridge Expressway Corridor Stakeholder Consultation

Response to Stakeholder Engagement, due on 12 April 2018

Questions asked in the consultation:

-What is your preferred Corridor, and why?

-Are there any Corridors you do not support, and why?

Response from the Vale of White Horse District Council

Introduction

The Vale of White Horse District Council continue to take a keen interest in development of plans for the Oxford to Cambridge Expressway. It is noted that at this stage, the Expressway Team have asked for feedback from stakeholders on preferences regarding the corridor to be chosen for the Expressway. It is understood that, alongside more detailed assessment work, this will help inform the government decision on a preferred corridor planned for this summer.

The Council believe that delivery of the Expressway could impact both positively and negatively on our communities for years to come, with the scale of impact dependent on the corridor and route chosen. Meaningful and detailed consultation with our communities will therefore be necessary as the Expressway scheme further develops, particularly as more detail of proposed routes comes forward.

The views outlined below on corridor preferences should therefore be taken as an assessment based on the current evidence and information available. These views may change as more detailed evidence comes forward, and as this becomes available for discussion and review by all those potentially impacted by the proposed scheme. The response also builds on views on potential routes previously sent by the Leader of the Vale of White Horse to Lord Adonis, chair of the National Infrastructure Commission in August 2017.

Context

The Vale of White Horse is located in Oxfordshire, to the south and west of Oxford City, with population spread between a number of market towns and villages. Significant growth of jobs and homes is planned across the district, predominately in the Science Vale area where approximately 20,000 new homes and 20,000 new jobs are planned over the next 20 years (over Vale of White Horse and the adjacent district of South Oxfordshire). This growth includes two Enterprise Zones and the Didcot Garden Town. Further development is also proposed at strategic sites close to Abingdon, and at settlements along the A420. The Vale is located at the western end of the Oxford to Cambridge growth arc.

Outside of growth areas, the district is predominately rural in nature, with significant areas covered by environmental designations, including the North Wessex Downs Area of Outstanding Natural Beauty, several Sites of Special Scientific Interest,

Ancient Woodland and Green Belt to the south and west of Oxford. This includes the Wytham Woods, Hurst Hill, Cothill Fen and Dry Sandford SSSIs.

The Strategic Road Network (SRN) route of main importance to the district is the A34 which routes through the eastern area of the district and provides strategic road access to the towns of Abingdon and Didcot. Also of relevance are the M40 and M4 motorways, which connect to the A34 to the north and south of the district, and which means that there is currently a significant amount of through traffic attracted to the A34.

The A34 is used daily by residents in our district, for travel to work, services and for leisure, and provide key linkages for them to surrounding areas. However, as the route is also heavily used for longer-distance travel, including HGV traffic between the South Coast and the Midlands/ North of England, congestion is often experienced on the part of the route through Oxfordshire. Traffic modelling work undertaken to support local plans in the area shows this is forecast to worsen as new jobs and homes come forward.

There is therefore an acknowledged need to improve the capacity and reliability of these routes, with the Ox-Cam Expressway plans likely to assist in tackling current and forecast operational issues. The Expressway could also link well with new housing and employment along its route where new junctions are located. However, as plans for any improvements to these road routes come forward, there will need to be a careful consideration of environmental matters, including review of possible mitigation.

Answer to questions asked:

What is your preferred corridor and why?

The Council have reviewed the proposed corridors, with reference to the plans within the 'Oxford to Cambridge Expressway Strategic Study Stage 3 Report,' published in November 2016, and in particular the road options plan shown in Appendix 1. On the basis of this plan, the Council would prefer **Road Option A** which would route between Milton Keynes and the A34 to the South of Oxford via Aylesbury (Buckinghamshire) and across the M40 close to Thame.

The plan also includes a number of sub-options around Oxford. The Council would prefer the **Oxford Sub-Option S4** which links south off the route of **Road Option A** towards the north of Didcot and would link back to the A34 between Abingdon and Didcot.

It is considered that a combination of **Road Option A** and the **Oxford Sub-Option S4**, would have the following key benefits:

- Provision of direct linkages between the Expressway and the growth area of the Didcot Garden Town, particularly if a junction was provided to access the proposed new Thames road bridge crossing between Culham and Didcot.
- Through provision of an alternative fast link between the A34 to the M40, enabling traffic relief to a longer section of the A34 past Oxford where

significant congestion already exists. Effectively, in combination with the M40, the Expressway could provide an alternative, faster route between the Didcot and Bicester growth areas

- In turn, this could enable road space on the existing A34 past Oxford to be prioritised for local and public transport access between Abingdon and Oxford and Bicester and Oxford, fitting with plans for significantly improved public transport access linked to new growth areas along this corridor
- An example of this in the Vale of White Horse is the Dalton Barracks site, which is a proposed allocation of 1,200 homes in the new Local Plan, but which could deliver further development in the longer-term, potentially in excess of 4,000 homes. Provision of transport infrastructure capacity will be key to delivering this growth. In particular, enhanced public transport access along the A34 to Oxford, assisted through diversion of traffic along the Expressway to the south of Oxford, would help enable the further development to come forward.
- Helping alleviate Air Quality issues caused by traffic in Abingdon, adjacent to the existing A34 at Botley, and at the Oxford Meadows SAC to the north-west of Oxford.
- It is considered that this route would in general have less impact on environmentally sensitive areas than the other sub-options proposed around Oxford. In particular, it would have less impact on the Green Belt than routes closer to Oxford.

Are there any Corridors you do not support, and why?

The Vale of White Horse is not generally supportive of **Road Option B or C**, particularly if this is linked to the **Oxford Sub-Option S1** routing to the north and west of Oxford. In particular, we are concerned that this route would not provide the benefits of **Road Option A** and **Oxford Sub-Option S4**, and could have the following impacts in our district:

- Depending on exact route (whether on-line or off-line to the existing A34), there may be a need to demolish homes or significantly impact on communities in the Botley, Cumnor and/or Wootton areas.
- Depending on the route, the district would be concerned regarding potential impacts on Ancient Woodland to the south/ east of Oxford and/ or Sites of Special Scientific Interest in the Dry Sandford, Cumnor and Wytham areas. This route might be expected to impact the Cothill Fen and Oxford Meadows Special Area of Conservation and thus be subject to Appropriate Assessment, and
- It is also noted that the topography of the area could be challenging to overcome, for example if the road was routed close to the Boars Hill area

We would also be concerned that **Oxford Sub-Options S2 and S3** to the east of Oxford would not have the benefits of linking with proposed growth as per the **Oxford Sub-Option S4**, but in general these options are more beneficial to **Oxford Sub-Option S1**, should **Road Option B or C** be chosen as the preferred corridor. If **Road Option B or C** in combination with one of the **Oxford Sub-Options** are chosen by central government to be the preferred Expressway corridor option, the district would want to engage further with Highways England to understand impacts

on the district in more detail. In particular, the district would want to discuss how any routes within the corridor would impact on our communities, and how mitigation could be developed to address these forecast impacts.

Conclusion:

The above comments on route options are given on the basis of the information available at this time. As more detail of assessments comes forward, and once a preferred corridor is chosen, the district would want to continue to be engaged on potential benefits and impacts of the Expressway.

In addition, it is important to note that the Vale of White Horse, along with the other districts in Oxfordshire, is working on a Joint Statutory Spatial Plan (JSSP) which will set out the high level growth in Oxfordshire to 2050. The route of the potential corridor will likely have a significant bearing on this document and the relationship with future growth. For the JSSP to meet the deadlines agreed with MHCLG for its production, this is a critical part of the jigsaw we are keen to understand.

Finally, we would particularly like to see a decision on the preferred corridor also make clear the preferred sub-option around Oxford. This will ensure greater clarity for all regarding the complete proposed corridor.

Appendix 1: Schematic figure from Stage 3 Oxford to Cambridge Expressway Report, Nov 2016

Oxford to Cambridge Expressway Strategic Study: Stage 3 Report

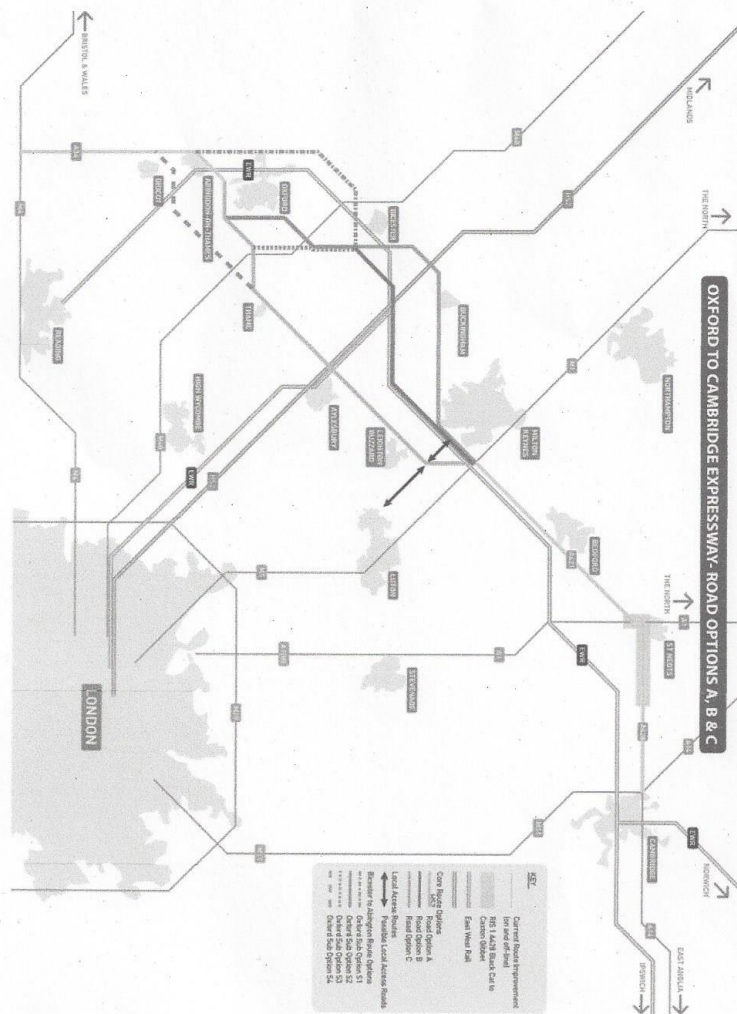


Figure 5-2:
Shortlisted
Intervention
Options