

TOWN AND COUNTRY PLANNING ACT 1990 – SECTION 77

TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT
PROCEDURE) (ENGLAND) ORDER 2015

TOWN AND COUNTRY PLANNING (INQUIRIES PROCEDURE) (ENGLAND)
RULES 2000

SUMMARY OF PROOF OF EVIDENCE

APPLICATION BY OXFORD COUNTY COUNCIL

Emma Baker BA (Hons) MRTPI on behalf of South Oxfordshire District Council and
Vale of White Horse District Council

Appeal reference: PCU/RTI/U3100/3326455

Council's reference: P23/S2955/CM

January 2024

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INTRODUCTION

1. This Proof of Evidence has been prepared as part of the evidence for the Rule 6 party, South Oxfordshire District Council, concerning PINS ref: APP/U3100/V/23/3326625 related to the HIF1 scheme.

Qualifications and Experience

2. I am Emma Baker, a Chartered Town Planner (MRTPI) holding a Bachelor of Arts (hons) Town Planning Degree and a Post Graduate Diploma in Town and Country Planning. I am employed by both South Oxfordshire District Council and Vale of White Horse District Council as a Planning Policy Team Leader.
3. I have 20 years of experience working in various planning policy roles in local government, including over 17 years in lead policy roles. I have worked for both South Oxfordshire and Vale of White Horse in a shared Planning Policy team for 6 years.
4. The evidence expressed which I have prepared and provided for this appeal is true to the best of my knowledge and it has been given in accordance with the guidance of my professional institution within the Royal Town Planning Institute Code of Professional Conduct. I confirm that the opinions expressed are my true and professional opinions.

Scope of Evidence

5. Paragraph 27 of the Inspector's notes that followed the Case Management Conference on 9 November 2023 advises that all evidence will be heard in topics. The topics were reorganised by the Inspector in the letter of 12 January 2024. Having regard to the list of topics in the 12 January letter, my Proof of Evidence has been prepared in response to:

- Topic 1 - The need for and benefits of the scheme;
- Topic 2 - Whether the transport modelling on which the proposal is based is robust and takes account of any significant traffic impacts in the wider area; and
- Topic 3 - Whether the proposal would make acceptable provision for sustainable travel, including walking and cycling and accord with the Local Transport and Connectivity Plan (LTCP).

6. This Proof should be read in conjunction with the other Proof of Evidence for South Oxfordshire District Council prepared by Emma Bowerman, which covers matters relating to Planning Policy. My Proof of Evidence does not intend to repeat that evidence.

THE NEED AND BENEFITS OF THE SCHEME

a) Wider employment and housing objectives

Housing Infrastructure Fund Objectives

7. The 'HIF1 scheme' related to the planning application subject to this Inquiry, is mostly forward-funded by the Housing Infrastructure Fund (HIF). Oxfordshire County Council were notified of the award of £218 million from the government's Housing Infrastructure Fund in 2019 following the announcement in the chancellors 2019 Spring Statement¹.

8. Page 3 of the Governments 'An introduction to the Housing Infrastructure Fund'² states that HIF was a government capital programme totalling £2.3 billion to help deliver 100,000 new homes in England. The funding was awarded to local authorities on a highly competitive basis through a formal bid process. The HIF fund was intended to provide grant funding for new infrastructure that sought to unlock new homes in the areas of greatest housing demand.

9. The purpose of the Housing Infrastructure Fund is set out in page 4 of the Governments 'An introduction to the Housing Infrastructure Fund' which was:
 - To deliver new physical infrastructure to support new and existing communities;
 - To make more land available for housing in high-demand areas, resulting in new additional homes that otherwise would not have been built;
 - To support ambitious local authorities who want to step up their plans for growth and make a meaningful difference to the overall housing supply;
 - To enable local authorities to recycle the funding for other infrastructure projects, achieving more and delivering new homes in the future.

¹ [Spring Statement 2019: Philip Hammond's speech - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/speeches/spring-statement-2019-philip-hammond)

² An introduction to the Housing Infrastructure Fund
https://assets.publishing.service.gov.uk/media/5a82d2cee5274a2e8ab59882/DCLG_Introduction_to_Housing_Infrastructure_WEB.pdf

10. The Government stated on page 5 of ‘An introduction to the Housing Infrastructure Fund’ that it was concerned that numerous housing sites across the country were being held back because the costs of putting in the infrastructure and building the homes were too great. The Government hoped that the HIF fund would provide the final, or missing, piece(s) of infrastructure funding to get additional sites allocated or existing sites unblocked quickly. They expected the infrastructure to be built soon after schemes were awarded funding, and for the homes to follow at pace.
11. The relevant Government department at that time (MHCLG) ran a competitive bid process after appointing an assessment panel, who were required to review bid documents' claims about the links between potential housing sites and the HIF scheme bidders were promoting.

Housing Objectives

12. Reflecting on wider housing objectives, the NPPF (December 2023) in Chapter 5 sets out the Government’s objective of significantly boosting the supply of homes, using planning policies to identify a sufficient supply and mix of sites. I draw attention to paragraph 74 of the NPPF that states *“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)”*. The NPPF goes on to instruct strategic policy-making authorities to *“consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains”*. This is important context for the adopted South Oxfordshire Local Plan 2035 (Core Document G1) which took on board the approach set out in what is now paragraph 74 of the NPPF in the development of the plan.
13. The South Oxfordshire Local Plan 2035 included a housing requirement in Policy STRAT2 of 23,550 dwellings. The planned housing supply totals 30,056

dwellings, exceeding the evidenced housing need by 27%. This buffer of housing supply was required to account for the Local Plans' strategy of meeting some of the housing requirements through the provision of several large strategic allocations around the district (Policies STRAT7 – STRAT14). The Examining Inspector stated in the South Oxfordshire Local Plan Inspectors Report³ in paragraph 201 that around 39% of the total planned housing supply is being delivered on large allocations during the plan period. This combination of large allocations needed to be planned alongside investment in infrastructure; an approach which is supported in NPPF paragraph 74. This meant that it was sensible to include a buffer of housing supply to account for the strategic allocations having long delivery periods and for the sites to secure the necessary infrastructure to bring them forward. Such sites have long lead in times and some of them will be delivering homes after the end of the plan period in 2035. This approach was supported by the Examining Inspector. At paragraph 205 of the Inspector's Report it states *"This is of particular concern in South Oxfordshire because the site allocations are large and critical to the Plan's delivery; they require infrastructure to be in place to enable development to proceed as anticipated... Without this size of contingency buffer in place, there would be a greater likelihood that infrastructure delivery problems and slippage would jeopardise the delivery of the plan and the adequate provision of much needed housing, threatening the 5 year supply position."*

14. In December 2015, the Government announced that Didcot would become a Garden Town delivering 15,050 homes and 20,000 high-tech jobs in the greater Didcot area⁴. The South Oxfordshire Local Plan 2035 also counted other sources of housing supply including the previous Core Strategy 2015 allocations and other new sites to ensure that the Didcot Garden Town targets (which were set at the time of the designation of the Garden Town), ensuring those targets could be met.

³ South Oxfordshire Local Plan 2035 Inspectors Report - https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1670535423&CODE=0E0BE05B297DC02E146797D2655847AD

⁴ Government press release announcing Didcot Garden Town - [New garden towns to create thousands of new homes - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/new-garden-towns-to-create-thousands-of-new-homes)

15. South Oxfordshire Local Plan 2035 Policy STRAT3 Didcot Garden Town made it clear at paragraph (1) that the Local Plan included supporting policies to enable the acquisition of significant funding investment and safeguarding land to implement infrastructure schemes. Paragraph 3.49 that accompanies Policy STRAT3 explicitly states *“The Housing and Infrastructure Fund awarded to Oxfordshire County Council of £218m will enable the delivery of infrastructure to support key sites in and around Didcot. This includes sites in Vale of White Horse District.”* Policy STRAT3 (3) also states that significant infrastructure improvements are committed to under Policy TRANS1b Supporting Strategic Transport Investment, and that infrastructure will need to be in place to enable sites allocated in the Local Plan in and around Didcot to be delivered. Policy TRANS1b criteria vii specifically references the support for the HIF1 scheme.
16. The HIF1 scheme is consistent with the Government’s aim of boosting the supply of housing. At the time of the last South Oxfordshire Local Plan 2035 examination in 2020, a calculation was undertaken to assess how many homes HIF1 would underpin across the area to answer the Local Plan Inspector’s questions about how much growth was assumed in and around Didcot. This was assessed using information from the HIF1 bid as well as other infrastructure evidence and monitoring information about planning permissions in the area. This was an assessment done at a point in time. This assessment was provided in a note (Core Document G.16) to the Local Plan examination, which demonstrated that HIF1 would underpin at least 19,319 homes directly at that time within the South Oxfordshire and Vale of White Horse districts. The figure of at least 19,319 homes factored in monitoring information on completions from 2016 to 2020. Although there has been no reassessment of the HIF1-linked housing since the calculation was undertaken in 2020, more completions from windfall sites in the area linked to the HIF1 schemes are likely to have been granted planning permission in the Districts, therefore the figure is likely to be higher than the 19,319 calculated in 2020.

17. Transport evidence underpinning both districts' adopted Local Plans assumes HIF1 would be delivered, therefore it indirectly underpins all planned housing in South and Vale Districts contained in the adopted Local Plans. I cover this again indirect link between the evidence and the scheme assumption below in paragraphs 53 and 54. With Vale's housing requirement of at least 22,760 homes and South Oxfordshire's supply of 30,056 homes (which intentionally exceed the housing requirements), this amounts to at least 52,816 homes indirectly at risk (although some of these will already have been developed).

18. Another related matter to housing which was considered in the examination of the South Oxfordshire Local Plan was the treatment of Green Belt land. The Council had to demonstrate that there were exceptional circumstances to release significant areas of land from the Green Belt, and this included land for strategic allocations that are linked to HIF1 schemes including Land adjacent to Culham Science Centre (STRAT9) and land at Berinsfield (STRAT10i). A very high bar is set for a Local Plan to demonstrate that exceptional circumstances exist for Green Belt amendments. The five exceptional circumstances justifying a release of the Green Belt at Culham and Berinsfield were set out in paragraphs 3.70 and 3.78 of the South Oxfordshire Local Plan:

- To enable the Culham Science Centre to realise its full potential as a science campus where publicly funded science research and commercial technology growth can flourish.
- The additional land provides an opportunity to deliver housing adjacent to one of the major employers in southern Oxfordshire.
- Development in this location is at the heart of Science Vale and supports the delivery of much-needed significant strategic infrastructure.
- The tenure mix of housing in Berinsfield is more unbalanced than in other parts of the district, with higher levels of social rent. Releasing land for development will help to rebalance the mix as well as provide further opportunities for employment and service provision.
- For Oxfordshire, the village scores highly on the Indices of Deprivation (2019), particularly in the following domains: income; employment;

education, skills and training, including adult skills, children and young people; and access to housing, including affordability.

A compelling set of exceptional circumstances relating to the potential of Science Vale was made and accepted. Without HIF1, the Local Plan allocations that were successfully justified to be removed from the Green Belt are undermined. The implications of this would be that these sites that are linked directly to HIF1, would lose the necessary supporting infrastructure and are at risk of not being delivered. This would risk leaving allocations that were justified on former Green Belt land unable to come forward for development.

19. Following extensive examination of the delivery of the Didcot Garden Town and its aim for at least 15,000 homes and the related HIF1 infrastructure, the South Oxfordshire Local Plan 2035 was found to be sound.

20. The homes linked to HIF1 are plan-led, in adopted development plans (Core Document G.1, G.2.1 and G.2.7), and they include larger scale developments (allocated sites in South Oxfordshire Local Plan Policy H2: New Housing in Didcot and Land Adjacent to Culham Science Centre STRAT9, for example). The planned homes and the HIF1 scheme accompanying them have developed together as an integrated, sound, and tested package, which is plan-led and funded together with the necessary infrastructure.

21. Significant weight should be placed on the ability of HIF1 to help support the delivery of the housing supply established in the South Oxfordshire Local Plan 2035.

Economic Objectives

22. The NPPF paragraph 85 is relevant guidance that helps to justify why the HIF1 scheme is important. It states *“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to*

build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.”

23. There was significant financial investment of £218 million made towards the HIF1 scheme, and the scheme related to development around Didcot Garden Town and the wider area. However, as the bid for HIF1 argued, it is also related to the consideration of the opportunities linked to the development of Science Vale as an area of economic potential i.e. with the homes enabled there is a better balance between homes and jobs.
24. The HIF1 scheme will unlock the potential of Science Vale to deliver significant economic, social, and environmental benefits across the area, and therefore for the UK. This was part of the rationale for the focus on Science Vale that was adopted for the spatial strategy for the South Oxfordshire Local Plan 2035. Paragraph 3.7 of the South Oxfordshire Local Plan 2035 sets out the options for the spatial strategy, listing options a to h. Paragraph 3.8 then explains the reasons for choosing the final strategy in Policy STRAT1, choosing the original options a, b and h. In summary, the spatial strategy was to principally focus development at Science Vale and sustainable settlements (which include Towns and Larger Villages), where over 70% of housing was to be located, continuing the Core Strategy approach, development next to the neighbouring major urban area of Oxford, and locating development where it related to specific locations that would fund projects.
25. An important part of the strategy for Science Vale was to improve and strengthen its relationship with Didcot and realise Didcot’s full potential as a thriving and attractive location to live, work and visit. At paragraph 3.42 of the Local Plan it sets out that it was envisaged that this would be achieved by providing the homes, jobs, skills, and infrastructure needed to turn Didcot into a successful and sustainable town, and a vital part of a thriving Science Vale.

26. HIF as a funding method was only meant to relate to new homes. Through the bid process for funding, the impact on the supply of new jobs without HIF being in place wasn't explored. However, it is the plan-making system that links housing and employment, by the methodology used in preparing Housing Market Assessments which are then used to set the housing requirement. The South Oxfordshire Local Plan 2035 Inspectors report at paragraph 43 confirms the link between jobs growth and the planned housing growth. This planned housing growth is supported by the HIF1 scheme. By supporting housing growth in the plan, HIF1 also supports the economic growth which the housing underpins. This approach is supported by the Oxfordshire Local Enterprise Partnership and within the Science Vale Area Transport Strategy, stating that a trigger for the need for HIF1 was the significant employment generation in the area and its resulting impacts on the road network, but also the need to maintain that jobs growth with sufficient population growth in the area.
27. The planned employment development directly linked to HIF1 will include 9.5 hectares of employment around Didcot in South Oxfordshire, the redevelopment and intensification of operations at Culham Science Centre, and also 7.3 hectares (net) of new employment and at least 5 hectares of additional employment land at Berinsfield.
28. Culham Science Centre is the focal point of the European fusion research programme aiming to create carbon-free and sustainable energy sources for future generations. It is also a base for fusion-related technology developments and the Culham Innovation Centre, and the site is benefiting from investments from the Government to cement its place as a significant scientific and economic base of operations in the UK.
29. Significant weight should be placed on how the scheme aligns with paragraph 85 of the NPPF by supporting economic growth and productivity, creating conditions for businesses to invest and expand, and allowing areas to build on their strengths. Also significant weight should be placed on the ability of HIF1 to help address infrastructure challenges to secure a significant amount of employment

development of high value, located within the nationally and globally important hotspot for enterprise and innovation that Science Vale is.

b) Development and local transport policy framework

30. The Proof of Evidence from Emma Bowerman includes a relevant reflection of the scheme against the development framework in terms of the Development Plan, which I will not repeat.

31. There is an argument presented within Rule 6 Statements of Case that there should be greater weight applied to the emerging South Oxfordshire and Vale of White Horse Joint Local Plan⁵. I do not accept that argument. The emerging Joint Local Plan has reached Regulation 18 consultation (its second Regulation 18 consultation) which commenced on 10 January 2024 for 6 weeks. The emerging Joint Local Plan contains options, preferred options, and full draft policies. The plan has not reached Regulation 19 stage yet, it is at a relatively early stage and only limited weight can be afforded to it. In any case, the emerging Joint Local Plan is reliant on the sites that have not yet been delivered from the existing adopted plans. Furthermore, it proposes more development in line with an emerging joint spatial strategy with an increased site allocation proposed at the Dalton Barracks site in Vale of White Horse district, and slightly more development is planned to be attributed to sites around Didcot in the South Oxfordshire area because of changes through site masterplanning and planning permissions being granted with slightly higher site capacities. The emerging Joint Local Plan is prepared again with the presumption that HIF1 will need to be delivered. Without HIF1 the emerging Joint Local Plan would also not be achievable. Even if the emerging Joint Local Plan is given more weight as some Rule 6 parties suggest, the emerging plan is equally as supportive of HIF1 as the adopted Local Plans for South and Vale.

⁵ <https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2024/01/Joint-Local-Plan-Preferred-Options-Document.pdf>

32. The relevant current transport policy framework will include Oxfordshire County Council's Local Transport and Connectivity Plan 2022 (Core Document G.4). South Oxfordshire District Council had not raised concerns regarding the scheme's compliance with the Local Transport and Connectivity Plan.
33. An argument is made in Rule 6 parties Statements of Case that the HIF1 planning application does not comply with Policy 27 of the Local Transport and Connectivity Plan (Core Document G.4) regarding assessments of the application against local carbon budgets. This is not accepted. The HIF1 scheme is an integral part of the Local Transport and Connectivity Plan, featured in Appendix 1 of Core Document G.4, which monitors and updates about the progress of the HIF1 scheme as part of the Science Vale Area Strategy. It updates us in Appendix 1 that *“The infrastructure proposed in this policy is being delivered as part of the HIF project. The project is estimated to completed by 2024”*. In all emerging Local Plans in Oxfordshire, there are currently no defined carbon budgets upon which the scheme can be assessed.
34. I do not support the Oxfordshire County Council's Planning Committee's concern raised (reason for refusal number 8), that the applicant had approached the traffic modelling for a new road scheme contrary to the policies of the Local Transport and Connectivity Plan. Neither do other Rule 6 Statements of Case raise a warranted concern.

c) Identification of broad need

35. My expertise does not include traffic modelling, therefore my proof focuses on the need for the scheme from the perspective of the district's Local Plans and broadly what the evidence supporting those plans has stated.

Earlier stages of identification for the need for the scheme

36. The relevant economic strategies and policy context at the time of identifying the need for a HIF1 scheme is important to consider why HIF1 was required.
37. The South Oxfordshire Local Plan 2035 states in paragraph 6.17 that *“Road and rail connections within and through South Oxfordshire are currently experiencing significant growth in demand because of strong economic growth”*. This statement is explanatory text to Policy TRANS1b, a policy that supports the HIF1 scheme delivery. The statement reflects the context for the Local Plan i.e. that the commitments in the previous Core Strategy and the outcomes of wider economic strategies at that time as well as the transport evidence point to significant demand and pressure on the road and rail network.
38. In 2016 when the South Oxfordshire Local Plan was early in development, transport modelling work was being undertaken aiming to support the choices to be made in the Local Plan, but also to help with the development of wider transport work undertaken by the County Council, such as the Local Transport Plan at that time (LTP4, Core Document G.5) and its related Area Strategies, especially the Science Vale Area Strategy⁶ which was updated in 2016.
39. Transport modelling to assess the impact that future developments would have on the Science Vale transport network was being undertaken. During the South Oxfordshire Local Plan 2035 development, it was known that there would be a significant housing need that was identified by evidence in the Oxfordshire Strategic Housing Market Assessment⁷. It was also evident that this could trigger a demand for several transport schemes, when factoring in housing need with the past job growth and the projections for future job growth. These issues would need to be considered collectively in order to mitigate the cumulative impact of

⁶ Science Vale Area Strategy (page 35 onwards) https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-connecting-oxfordshire/ConnectingOxfordshireAreaStrategies_1.pdf

⁷ Oxfordshire Strategic Housing Market Assessment
https://data.southoxon.gov.uk/ccm/support/dynamic_serve.jsp?ID=1670533659&CODE=F0466A8D7F61D0D6EB661DFD1A27AEA0

proposed growth and to support the continued success of delivery of high-value jobs growth.

40. Before the Local Transport and Connectivity Plan was approved by Oxfordshire County Council in July 2022 (Core Document G.4), the previous Local Transport Plan 4 (Core Document G.5) included a Science Vale Area Strategy⁸. At paragraph 13 the Area Strategy was clear that to support planned growth it was vital that new and improved transport infrastructure would need to be provided. Paragraph 13 further stated that movement within Science Vale and connections with the rest of Oxfordshire's transport network also needed to be efficient and reliable. High-quality, efficient transport links along what is known as the 'Knowledge Spine' (a geographical connection between Oxford at the centre, Science Vale to the south and Bicester to the North) were also essential. The Knowledge Spine and the concept of Science Vale was rooted within a wider economic strategy produced by the Oxfordshire Local Enterprise Partnership in 2016 – the Strategic Economic Plan for Oxfordshire⁹ (see figure 3 on page 19 for the mapped Knowledge Spine). Science Vale is where existing science and technology industries are focussed, and it was envisioned in the Science Vale Area Strategy to be the area with the greatest development potential for both employment and housing growth (see paragraph 13).

41. The transport priorities for the Science Vale in the Area Strategy are set out at paragraph 16, and these were to improve access to Culham Science Centre and the Enterprise Zone sites at Milton Park, Didcot and Harwell Campus for international, national and local travel, to enable economic growth at other key employment sites in the area, to plan to manage the impact of future housing growth on the transport network, and to improve connectivity between employment, services and areas of housing growth. In addition, highway schemes to provide extra capacity and accessibility on key routes to Harwell Campus, Milton Park and Culham Science Centre were planned to offer route

⁸ Science Vale Area Strategy (page 35 onwards) https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-connecting-oxfordshire/ConnectingOxfordshireAreaStrategies_1.pdf

⁹ SEP for Oxfordshire 2016

<https://www.oxfordshirelep.com/sites/default/files/uploads/Oxfordshire%20SEP.pdf>

choice and travel options between homes and workplaces, helping to spread the impact of what would be an increase of traffic on the roads (see paragraph 33).

42. The Science Vale Area Strategy outlined the main concepts for what would later become the HIF1 scheme at paragraph 34. It was clear that the infrastructure enhancements would enable better connections around Science Vale and its major employment areas, and it was stated in paragraph 34 that the planned route would provide some relief to the A34 for local movements as well as network resilience and more direct and attractive walking and cycling routes and enable improvements to access Culham Science Centre through increased connectivity by bus and cycle and improved capacity at Culham station.
43. There was a high degree of collaboration between the Oxfordshire Local Enterprise Partnership with the development of economic strategy (principally the 2016 Oxfordshire Strategic Economic Plan¹⁰), Oxfordshire County Council and its development of transport policies, the Government with forward funding for infrastructure and the Local Plans of South Oxfordshire and Vale of White Horse to coordinate the delivery of the collective ambitions.
44. A collaborative approach helped develop the necessary scheme requirements and the evidence needed to demonstrate sound Local Plans, inclusive of the infrastructure and development needed to support employment and housing aspirations and to help deal with critical traffic impacts. The housing and employment development, if not plan-led, would have compounded these existing traffic impacts without the development of the HIF1 scheme.

Evaluation of Traffic Impacts and its relationship with HIF1

45. Atkins was commissioned in 2015 by Oxfordshire County Council and South Oxfordshire District Council to undertake an Evaluation of Transport Impacts (ETI) in relation to the emerging SODC Local Plan.

¹⁰ SEP for Oxfordshire 2016 -

<https://www.oxfordshirelep.com/sites/default/files/uploads/Oxfordshire%20SEP.pdf>

46. The first stage of the ETI considered the suitability of the Oxfordshire Strategic Model (OSM) to assess emerging Local Plan impacts. The subsequent part of the first stage evaluated the transport impacts of five Local Plan scenarios.
47. The second stage of the work looked in more detail at the impacts of the emerging development scenario, and prospective mitigation measures to support the Local Plan.
48. Stage 3 included additional mitigation measures for increased development, as well as alternative infrastructure options, compared with the 'do-minimum'.
49. The ETI Stage 2 Development Scenarios and Mitigation Testing (Core Document G.1.3) included three mitigation scenarios to test the impact of proposed highway schemes against the 'Do-Minimum' and Local Plan scenarios (these scenarios are described in section 2.5 of the report). The four schemes which comprise HIF1 were all included in the 'do minimum' scenario (see section 4.2, Table 11). The three mitigation scenarios tested were:

“Mitigation (a) – Removal of non-funded schemes from Local Plan Scenario

- *Culham to Didcot Thames River Crossing*
- *Clifton Hampden Bypass*
- *Science Bridge*
- *A4130 dualling between Milton Interchange and Science Bridge*

Mitigation (b1) – with non-funded schemes back in (identified under Mitigation (a)) and addition of Highway Mitigation Schemes

- *Stadhampton Bypass*
- *Watlington Bypass*
- *Roundabout improvement at Golden Balls – includes provision of left turn filter lane at Oxford Road (B4015) approach for northbound vehicles accessing the A4074.*

Mitigation (b2) – Addition of highway mitigation schemes to the Mitigation Scenario (b1)

- *Benson Bypass*
- *Nuneham Courtenay Bypass”*

50. The ETI Stage 2 report at page 18 states that, compared with the Local Plan scenario, for Mitigation Scenario (a) (i.e. removal of the HIF1 infrastructure) *“Table 9 shows forecast reduction of around 1000 total persons trips originating in the South Oxfordshire area and also reduction in car trips (around 450) and bus trips (around 400), and Table 10 shows forecast reduction of around 2000 total person trips destined for South Oxfordshire and also reduction in car trips (around 1300) and bus trips (around 300), suggesting that increased congestion and reduced accessibility in Culham, Didcot and Clifton Hampden area due to removal of mitigation schemes in these areas reduces the trips made in or destined for the South Oxfordshire area”.*

51. The paragraph above from page 18 of the ETI Stage 2 confirms the impact that development without that specific mitigation would have.

52. The ETI stages progressed alongside the Local Plan, and after funding was confirmed for HIF1 the modelling could assume that the mitigations included the schemes related to HIF1.

53. The scenario testing undertaken in the ETI Stage 3 (Core Documents G.1.4, G.1.5 and G.1.6) tested growth scenarios, all of which had the baseline traffic levels presented as if the HIF schemes were in place. Also the HIF1 infrastructure was included in the do-minimum scenario. This means that the do-minimum scenario is fully dependent on that mitigation scheme happening – this therefore underpins the Local Plan's strategy for development in Science Vale as a whole because the Local Plan growth has assumed the HIF1 scheme is happening. In my view based upon the conclusions of the ETI, the Local Plan would not, and could not, have adopted this strategy and housing and

employment provision, without the assumption that HIF1 would be needed and delivered. The South Oxfordshire Local Plan was prepared based on HIF1 being in place and it was examined and adopted in 2020 with the knowledge that the County Council had secured funding for HIF1.

54. As I have already explained, without approval for the HIF1 scheme, the South Oxfordshire Local Plan 2035 housing supply would be at risk both directly (with the sites that are dependent on HIF1 for mitigation) and indirectly (because of the baseline assumptions in the ETI that were used to test overall growth scenarios in the Local Plan).

55. When preparing for the Local Plan examination, Oxfordshire County Council's advice to South Oxfordshire (and what led to the need to consider a 'releasing development strategy' referred to in paragraph 57 below) was that almost all the HIF1 directly dependent sites cannot be accommodated on the highway network without exacerbating the severe impact, as per the NPPF 2018 paragraph 109 (current NPPF paragraph 115). Without the prospect of the HIF scheme, Oxfordshire County Council would likely need to object to any further development that would impact sensitive areas of the highway network.

56. In September of 2019, during the examination of the South Oxfordshire District Council Local Plan, the leader of Oxfordshire County Council (at that time Cllr Ian Hudspeth) wrote to the leader of South Oxfordshire District Council (at that time Cllr Sue Cooper)¹¹ stating *"Given existing growth, including many historical speculative sites, there has been a worsening of the highway network. Without this funding we cannot deliver the infrastructure needed to improve the network and the County Council will be forced into a position of objecting to any development, including commercial, significantly impacting on our collective ability to provide much needed new homes and jobs."*

¹¹ [2019-09-26-Letter-from-Ian-Hudspeth-to-SODC.pdf \(southoxon.gov.uk\)](#)

57. It was demonstrated that with only a small proportion of existing permitted growth (e.g. North East Didcot and other speculative sites in and around Didcot) the highway network would be over capacity around the current river crossings and at Clifton Hampden, as well as various other junctions. In 2019 and 2020 there were several highway-related objections upheld at appeal by the Planning Inspectorate, even for single dwelling developments in both districts. Since HIF1 funding was confirmed, an interim strategy was put in place by the County Council to prevent highway objections whilst the scheme design and planning application was being undertaken. The interim strategy, called the 'releasing development strategy', is not intended to be a permanent solution. Whilst waiting for the HIF1 infrastructure to be delivered, developments in the area are worsening the economic and environmental impacts that come with growth in a constrained area without the infrastructure to support them. Without HIF1, it is not reasonable to presume that the current interim strategy that enables planning permissions with highway impacts to be granted can continue. This could risk a return to the circumstances that were experienced in 2019 and 2020 of highway-related issues preventing development. Without the HIF1 scheme, there is a significant risk to the delivery of the South Oxfordshire Local Plan 2035 and the emerging Joint Local Plan 2041.

58. I do not support concerns raised after the event, in other Rule 6 Statements of Case that the traffic model supporting the South Oxfordshire Local Plan 2035 should cease to be supported as relevant evidence in support of the HIF1 scheme. The Evaluation of Transport Impacts modelling was thorough and it was relevant to the identification of the sites and strategy for the adopted Local Plan, including the mitigating infrastructure that was assumed within the Evaluation of Transport Impacts Stage (Core Document G.1.6), which was inclusive of the HIF1 scheme.

d) Benefits

59. The most significant benefit of the HIF1 scheme is the number of homes and jobs that the scheme supports across Science Vale. Without the scheme, the delivery of more homes is undermined and the current connectivity issues and traffic impacts in the area, together with the delivery of fewer new homes to support job growth will have a negative economic impact. The delivery of planned homes alongside jobs has significant economic benefits locally and it will enhance the attractiveness of the area for investment into Science Vale. The success of Science Vale provides a benefit for the United Kingdom's science and technology sectors.
60. Railways and the River Thames are physical constraints to movement by various modes around northern Didcot. There are physical severances between Didcot and Culham Science Centre to the north because of the River Thames and the railway lines serving Didcot Parkway. Cyclists need to use indirect routes which are often shared with cars on the main highways.
61. The same severance issues existed between Didcot and Harwell Campus because of the barrier created by the A34. The Oxfordshire Local Transport Plan 4 and the evidence for the Vale of White Horse Local Plan Part 1 (Evaluation of Traffic Impacts Study Final Report) determined that necessary infrastructure was needed, and it has been subsequently delivered, with the provision of Harwell Link Road Section 1 (B4493 to A417) and Harwell Link Road section 2 (Hagbourne Hill). The HIF1 scheme will benefit the area by helping overcome more of the physical constraints to the north and offer more choices by various modes of transport to travel between major employment areas and Didcot. This in turn could help to lessen the car dependence that many in Didcot have when it comes to options for journeys to work.
62. The scheme also has the benefit of offering alternative routes over the River Thames in times of flooding. The area is prone to flooding, with parts of the proposed scheme being located in Flood Zones 2 and 3. The single Thames crossing at Culham that currently exists is in Flood Zone 3 and it is prone to flooding and subject to closure during extreme flood events.

63. It is understood that a potential benefit of HIF1 scheme is that with better and quicker connections north of Didcot, public transport operators will have more reliable options to help cut journey times.
64. Didcot needs this investment. The area has been transforming, after accepting significant planned growth in successive plans, but with the assumption that HIF1 would help achieve several aims for better employer connections, easier movement around Science Vale, and economic and environmental benefits more widely. Without the HIF1 scheme, Didcot and the surrounding areas will risk either suffering from development moratoriums or enduring traffic pressures and poor connectivity from further development without a resolution.
65. It has been nine years since Didcot's 2015 Garden Town status was confirmed, and whilst some infrastructure has been delivered alongside development, the schemes in the HIF1 area have not kept pace with development. Oxfordshire partners are committed to the opportunity to transform Didcot through Garden Town status, to make it a truly sustainable hub in Science Vale, and to bring much-needed movement and connections around the town. Without the critical HIF1 scheme the vision for the Garden Town, which is part way through being achieved, would be unachievable. The adopted Local Plans embed the scheme, and the emerging Joint Local Plan and its draft policies and sites depend on this scheme being approved. With the HIF1 scheme the emerging Joint Local Plan can progress and enable the planned growth of the Didcot Garden Town as a key part of its strategy.

CONCLUSIONS

66. South Oxfordshire District Council has not raised concerns about the strategic need and benefits of the Planning Application.

67. I have outlined what the Council stresses to be a significant strategic need and multiple benefits of the HIF1 scheme relating to the economic and environmental benefits that the scheme would deliver. It is also clear that there is a relationship between significant levels of identified housing and employment in adopted and emerging Local Plans that are dependent on the delivery of the HIF1 scheme.

68. There are no compelling reasons for refusal proposed by the County Council Planning and Regulation Committee (but not subject to a formal decision by the committee before the Secretary of State call-in). Nor are there compelling reasons presented in other Rule 6 Statements of Case that would outweigh the strategic need and benefits for the scheme.

69. Based upon the planning balance judgement made by Emma Bowerman in her Proof of Evidence, planning permission should be granted.