

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**

**APPLICATION BY OXFORD COUNTY COUNCIL C/O JONATHAN HILL, AECOM
(AGENT) FOR THE DUALLING OF THE A4130 CARRIAGEWAY,
CONSTRUCTION OF THE DIDCOT SCIENCE BRIDGE, ROAD BRIDGE OVER
THE APPLEFORD RAILWAY SIDINGS AND ROAD BRIDGE OVER THE RIVER
THAMES AND ASSOCIATED WORKS BETWEEN THE A34 MILTON
INTERCHANGE AND THE B4015 NORTH OF CLIFTON HAMPDEN,
OXFORDSHIRE (APPLICATION NO: R3.0138/21)**

PROOF OF EVIDENCE (PLANNING APPLICATION) (TOPICS 1, 2 AND 3): 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/V2012/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 Vale of White Horse District Council, evidence for Topic 1 Strategic Need and Benefits, 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 updated by the Inspector in the letter of 12 January 2024. 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 Vale of White Horse District Council prepared by Adrian Butler, 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 chancellor's 2019 Spring Statement¹.

8. Page 3 of the Government's '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 Government's '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 Vale of White Horse Local Plan Part 1 (LPP1) (Core Document G.2.1) and Local Plan Part 2 (LPP2) (Core Document G.2.7) which took on board the approach set out in what is now paragraph 74 of the NPPF in the development of these Local Plans. The

adopted Local Plans were prepared to align with the NPPF's principle of growth being focused on a location that can be made sustainable.

13. Core Policy 4 of LPP1 and Core Policy 4a of LPP2 set a combined housing requirement of at least 22,760 homes for Vale of White Horse District and some of that (2,200) was for the cross-boundary housing needs of Oxford City, for which LPP2 allocated sites. At least 11,850 homes are included in the spatial strategy to be delivered within the Science Vale ringfenced area, as well as this being a location with a positive strategy for economic growth.
14. LPP1 paragraph 4.44 sets out how critical HIF1 is to the Vale Local Plan spatial strategy by stating *“Infrastructure delivery is important to ensure new development is sustainable and this is particularly important across the Science Vale area. This is where around 70 % of our projected jobs and 75 % of our strategic housing is directed. Essential strategic highway infrastructure has been identified to support the identified growth across Science Vale.”*
15. 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 area³. The Vale LPP1 allocated employment sites around Didcot and some housing allocations to contribute towards the Didcot Garden Town targets (which were set at the time of the designation of the Garden Town), ensuring those targets could be met.
16. To help secure the infrastructure needed to deliver the strategy for development in Science Vale and to deliver the aims of the Didcot Garden Town, the Vale LPP1 Policy CP17 identified HIF1 related highways infrastructure to mitigate the impact of the planned growth across Science Vale. Policy CP18 then safeguarded the necessary land to support the delivery of the related scheme.

³ 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)

17. 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, including within Vale of White Horse, 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.

18. 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 49 and 50. 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 as risk (although some of these will already have been developed).

19. 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 in Core Policy 15 of LPP1 are Valley Park for at least 2,250 homes but has planning permission for up to 4,254 homes, North West Valley Park for 800 homes, Milton Heights for 400 homes, 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.

20. Significant weight should be placed on the ability of HIF1 to help support the delivery of the housing requirement established in the Vale Local Plan Part 1.

Economic Objectives

21. 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.”*
22. 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.
23. 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 Vale Local Plan (Core Policies 4 and 5) to focus development at Science Vale where around 70% of the projected jobs and 75% of the strategic housing were projected to be delivered.

24. 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. The Local Plan envisaged that we would do this 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.
25. 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. 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.
26. The planned employment development directly linked to HIF1 will include some of the 208 hectares within the 'South-East Vale sub-area' allocated by Vale LPP1 Core Policy 15: Spatial Strategy for South East Vale Sub-Area, as many of these employment sites are located within Science Vale at Didcot Power Station, Milton Park and Harwell Campus.
27. Harwell Campus within Science Vale has over 200 organisations sited there, and it has received over £3 billion in scientific infrastructure investment. It is a pioneering site which hosts companies making advances in energy, space, health and quantum computing.
28. Milton Park is home to 250 businesses at the UK's largest single ownership science, business and technology community.

29. The route of the HIF1 schemes intersects with three of the Didcot Growth Accelerator Enterprise Zones including at Milton Interchange, Didcot A (also known as Signia Park) and Didcot Technology Park. The close link between the HIF1 scheme and these zones is geographically significant. All business rate growth generated within the Didcot Growth Accelerator Zone from April 2016 to March 2041 will be retained for use in funding local infrastructure projects. The HIF1 scheme is currently key to unlocking up to £110m in retained rates.
30. 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

31. The Proof of Evidence from Adrian Butler includes a relevant reflection of the scheme against the development framework in terms of the Development Plan, which I will not repeat.
32. 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 Plan⁴. I do not accept that argument. The emerging Joint Local Plan has reached Regulation 18 consultation (its second Regulation 18 consultation) which commenced on January 10 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 therefore at a relatively early stage and only limited weight can be afforded to it. In any case, the emerging

⁴ <https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2024/01/Joint-Local-Plan-Preferred-Options-Document.pdf>

Joint Local Plan is reliant on the sites that have not yet been delivered from the 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. 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.

33. The relevant current transport policy framework will include Oxfordshire County Council's Local Transport and Connectivity Plan 2022 (Core Document G.4). Vale of White Horse District Council had not raised concerns regarding the scheme's compliance with the Local Transport and Connectivity Plan.

34. 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.

35. 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

36. 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

37. 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.

38. In 2016 when the Vale of White Horse LPP2 was early in development, transport modelling work was being undertaken aiming to support the choices to be made in the LPP2, 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 Strategy⁵ 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 both the Vale LPP1 and LPP2 development, it was known that there would be a significant housing need that was identified by evidence in the Oxfordshire Strategic Housing Market Assessment⁶. 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 considered collectively in order to mitigate the cumulative impact of

⁵ Science Vale Area Strategy (page 35 onwards) https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-connecting-oxfordshire/ConnectingOxfordshireAreaStrategies_1.pdf

⁶ 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) 2016 included a Science Vale Area Strategy⁷. 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 Oxfordshire⁸ (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 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

⁷ Science Vale Area Strategy (page 35 onwards) https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-connecting-oxfordshire/ConnectingOxfordshireAreaStrategies_1.pdf

⁸ SEP for Oxfordshire 2016

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

Campus, Milton Park and Culham Science Centre were planned to offer route 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.
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 Plan⁹), 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.
45. The highway network is suffering severe traffic congestion now, and the Vale of White Horse Local Plan Part One Inspector's Report in 2016¹⁰ concluded this, stating at paragraph *"I have read and heard much debate about the robustness of the Impacts Study's findings and whether or not the residual congestion issues it identifies would be "severe" in terms of paragraph 32 of the NPPF. However,*

⁹ <https://www.oxfordshirelep.com/sites/default/files/uploads/Oxfordshire%20SEP.pdf>

¹⁰ Inspectors Report Vale Local Plan Part 1 <https://www.whitehorsedc.gov.uk/wp-content/uploads/sites/3/2019/07/Vale-of-White-Horse-Local-Plan-2031-Part-1-Inspectors-Report-FR.pdf>

there is no convincing and detailed evidence to demonstrate that the study's conclusions are not robust, bearing in mind that they can only ever be a strategic-level forecast and that more detailed transport impact appraisals will be necessary as part of the consideration of specific development proposals. Moreover, whilst it is to a significant degree a matter of judgement, I have read and heard nothing which persuades me that the District and County Councils' conclusion that the likely residual transport impacts would be acceptable is not a soundly-based finding. In considering this point I have borne in mind that the "starting point" situation for the Vale is as a district which very much suffers from traffic congestion."

Evaluation of Traffic Impacts and its relationship with HIF1

46. Atkins was commissioned in 2014 by Oxfordshire County Council and Vale of White Horse District Council to undertake an Evaluation of Transport Impacts (ETI) in relation to the emerging Vale LPP1. A subsequent ETI in 2017 supported Vale LPP2.
47. The first stage of the 2017 ETI (Core Document G.2.9) tested the emerging growth targets to help the council understand the impact of the emerging plan on the highway network.
48. The second stage of the 2017 ETI (Core Document G.2.10) looked in more detail at the impacts of a larger emerging development scenario, and clusters of sites for their worst-case scenario impacts in the highway network. There were two subsequent updates to the ETI to test different scenarios for growth, and the final version (Core Document G.2.12) included a mitigation package including the mitigations which would later become part of the HIF1 scheme.
49. The scenario testing undertaken in the ETI (Core Document G.2.12) 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 Vale Local Plan was prepared based on HIF1 being in place and Vale LPP2 was examined and adopted in 2019 with the knowledge that the County Council had secured funding for HIF1.

50. As I have already explained, without approval for the HIF1 scheme, the Vale LPP1 and LPP2 housing and employment 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 Vale LPP2).

51. When preparing for the Local Plan examination Oxfordshire County Council's advice to officers (and what led to the need to consider a 'releasing development strategy' referred to in paragraph 53 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.

52. 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*

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

development, including commercial, significantly impacting on our collective ability to provide much needed new homes and jobs.”

53. 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 was 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 2015 and the emerging Joint Local Plan 2041.

54. I do not support concerns raised after the event, in other Rule 6 Statements of Case that the traffic model supporting the Vale LPP1 and LPP2 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 Plans, including the mitigating infrastructure that was assumed within the Evaluation of Transport Impacts Stage (Core Document G.2.12), which was inclusive of the elements of the HIF1 scheme.

d) Benefits

55. 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.

56. 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.

57. 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.

58. 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 which impacts on the residents and businesses in the wider area.

59. 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.
60. 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.
61. 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

62. Vale of White Horse Council has not raised concerns about the strategic need and benefits of the Planning Application.

63. 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.

64. 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.

65. Based upon the planning balance judgement made by Adrian Butler in his Proof of Evidence, planning permission should be granted.