

**THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT GARDEN TOWN HIGHWAYS INFRASTRUCTURE –
A4130 IMPROVEMENT (MILTON GATE TO COLLETT ROUNDABOUT), A4197 DIDCOT TO CULHAM
LINK ROAD, AND A415 CLIFTON HAMPDEN BYPASS) COMPULSORY PURCHASE ORDER 2022**

(“THE CPO”)

AND

**THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT GARDEN TOWN HIGHWAYS INFRASTRUCTURE –
A4130 IMPROVEMENT (MILTON GATE TO COLLETT ROUNDABOUT), A4197 DIDCOT TO CULHAM
LINK ROAD, AND A415 CLIFTON HAMPDEN BYPASS) SIDE ROADS ORDER 2022**

(“THE SIDE ROADS ORDER”)

HIGHWAYS ACT 1980

AND

ACQUISITION OF LAND ACT 1981

PROOF OF EVIDENCE OF

STEVEN J SENSECALL DIP. T.P. MRTPI

ON BEHALF OF CEG



JANUARY 2024

Carter Jonas

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1.0 INTRODUCTION

Personal Details

- 1.1 I am Steven John Sensecall. I have an Honours Degree in Planning Studies and a Graduate Diploma in Conservation and Urban Renewal. I am a member of the Royal Town Planning Institute. I am an Equity Partner at Carter Jonas LLP. I am the firm's Head of Planning & Development for the South and South-west. I am based in the firm's office in Oxford, the address for which is Mayfield House, 256 Banbury Road, Oxford OX2 7DE.
- 1.2 I have been in practice as a consultant Town Planner in Oxfordshire for over 40 years, during which time I have been involved in a wide range of planning applications, appeals, development plan inquiries and Examinations in Public throughout England and Wales.
- 1.3 I am acting currently for a diverse list of clients including, the UK Atomic Energy Authority (UKAEA), Science and Technology Facilities Council (STFC), Oxford Preservation Trust, the University of Oxford, Rebellion Film Studios, the Defence Infrastructure Organisation, Berkeley Strategic, Berkeley (Oxford & Chiltern) Limited, St Modwen Developments and Advanced Research Clusters (ARC).
- 1.4 I represent CEG which is the promoter of the land comprising adopted South Oxfordshire Local Plan Policy STRAT9: Land Adjacent to Culham Science Centre. This is an allocation relating to the 217 hectares of land immediately to the west of Culham Campus for circa 3,500 new homes and new employment-generating development in the adopted South Oxfordshire Local Plan 2011 – 2035. I represented CEG at the Local Plan Examination in Public and worked closely with South Oxfordshire District Council in formulating the policy and its supporting text.
- 1.5 My CV is attached at **Appendix 1**.

Statement of Truth

- 1.6 I confirm that my evidence to this Inquiry has been prepared and is given in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions.

Scope of Evidence

- 1.7 I appear at this Inquiry on behalf of CEG. My Proof of Evidence supports the original Objection to the CPO as submitted on behalf of CEG [**Core Doc. J22**] and the subsequent Statement of Case [**Core Doc. M3**].
- 1.8 The scheme the subject of the inquiry is known as The Didcot Garden Town HIF Roads Scheme ("**the HIF Scheme**") and is more fully described as:

'The dualling of the A4130 carriageway (A4130 Widening) from the Milton Gate Junction eastwards, including the construction of three roundabouts; - A road bridge over the Great Western Mainline (Didcot Science Bridge) and realignment of the A4130 north east of the proposed road bridge including the relocation of a lagoon; - Construction of a new road between Didcot and Culham (Didcot to Culham River Crossing) including the construction of three roundabouts, a road bridge over the Appleford railway sidings and road bridge over the River Thames; - Construction of a new road between the B4015 and A415 (Clifton Hampden bypass), including the provision of one roundabout and associated junctions; and - Controlled crossings, footways and cycleways, landscaping, lighting, noise barriers and sustainable drainage systems.'

- 1.9 Oxfordshire County Council ("**OCC**") is promoting the HIF Scheme, and pursuant to this OCC has applied for CPO and an accompanying Side Roads Order for:

"The Oxfordshire County Council (Didcot Garden Town Highways Infrastructure – A4130 Improvement (Milton to Collett Roundabout), A4197 Didcot to Culham Link Road, and A415 Clifton Hampden Bypass) Compulsory Purchase Order 2022"

- 1.10 This proof of evidence should be read in conjunction with that of Mr Dean Swann, Civil Engineer, and Technical Director for Brookbanks.

2.0 CEG

- 2.1 Established in 1989, CEG is a private company with strong financial backing that actively invests in a wide range of property assets across the UK with offices in London, Leeds, and Cornwall.
- 2.2 The work of CEG spans residential, retail, office, industrial and mixed-use sectors, divided between the Development and Investment/Asset Management portfolios. In total, the Group is currently managing around 7,500 acres of land mixed between town centre redevelopment, regeneration, tall buildings, and strategic land.
- 2.3 Land within the CEG Development portfolio ranges from Urban to Brownfield to Greenfield and at present the strategic development land proportion extends across 60 sites around the UK. The scale of these sites ranges from around 100 to 5,000 dwellings with varying quantities of supporting facilities and infrastructure. CEG is responsible for projects on 8,000 acres capable of delivering 45,000 new homes and have the potential to deliver almost 10 million sq.ft of commercial development on its controlled sites.
- 2.4 CEG has an exemplary track record in delivering planning permissions on strategic development sites. Particularly, CEG has skill in working in partnerships with landowners, local authorities and communities to find effective and efficient solutions to complex development and planning issues. CEG's ability to engage with local communities is well proven.

3.0 CULHAM SCIENCE VILLAGE

- 3.1 The STRAT9 Site is situated to the north of Appleford-on-Thames, northeast of Culham, southeast of Abingdon-on-Thames, south of Radley and north west of Clifton Hampden and Culham Campus. It comprises approximately 260ha of both agricultural and brownfield land and is currently accessed off the A415 Abingdon Road and Thame Lane. Culham Railway Station is situated within the Site and Culham Campus is immediately adjacent, providing excellent opportunities for enhanced public transport services and local jobs.
- 3.2 The STRAT9 Site was released from the Green Belt – through the examination and adoption of the extant South Oxfordshire Local Plan – to provide, inter alia, a new strategic allocation of around 3,500 dwellings and a net increase of at least 7.3 hectares of employment land in combination with the adjacent Culham Campus (Policy STRAT8). In order to demonstrate that releasing the site from the Green Belt was justified, a number of strategic and site-specific exceptional circumstances were presented, both in isolation and in combination with one-another. These included (amongst other matters): the need for housing in South Oxfordshire, and land use constraints across the district; significant employment potential at the heart of Science Vale; and, the contribution that strategic development at Culham will make towards planned strategic improvements to public transport networks (rail and bus) and new road infrastructure.

3.3 The guiding vision for the STRAT9 site is as follows:

Culham Science Village comprises around 220 hectares of brownfield and greenfield land adjacent to Culham Campus, an internationally recognised centre for fusion research and development and home to a community of related businesses.

Culham Railway Station, located within the heart of the village, will be upgraded to form a multi-modal interchange for the site and the neighbouring Science Centre offering excellent rail connections and a variety of active and sustainable transport choices to all.

The associated green infrastructure strategy for Culham Science Village will enhance the biodiversity of the local area as well as providing the opportunity for multifunctional public realm that enhances the health and well-being of new residents and visitors.

Culham No.1 Site

- 3.4 Carter Jonas is in the process of submitting the first outline planning application for Culham Science Village, on the area of land between the Culham Campus, and the railway line; known as Culham No.1 Site.
- 3.5 The Culham No.1 Site comprises approximately 22.8ha of brownfield land which currently accommodates a range of primarily employment businesses. The lawful use of all of the buildings on the Site is for Class B1, B2 and B8 uses.
- 3.6 The Site was removed from the Green Belt in the recently adopted South Oxfordshire Local Plan.
- 3.7 The Site is located to the north of the A415 Abingdon Road. The only vehicular access to the Site is from the A415.
- 3.8 Culham Railway Station is situated to the west of the Culham No. 1 Site at its southern end. The Didcot Parkway to Oxford train line runs along the western boundary.
- 3.9 As is explained in more detail by Mr. Swann in his evidence, as part of a former airfield, the existing site gradients are relatively shallow, generally falling from north to south. From a Topographic Survey, produced by MK Surveys in July 2016, it's been established that the majority of the site lies between 57.0m and 59.0m AOD. In the southernmost third of the site, the ground falls to the west, reaching its lowest level of circa 52.0m AOD where the existing water courses are present as discussed above. The ground then rises again to meet the A415 Abingdon Road.
- 3.10 CEG's Vision for the site is to achieve a high-quality and sustainable development of modern office, laboratory and research and development (R&D) space to meet an identified need in the Oxfordshire science market. An indicative Culham No 1 masterplan can be seen at **Appendix 2** of my evidence.

- 3.11 The emerging landscape-led proposals – as shown in the indicative masterplan – seek to work with the existing site features and constraints to make the development fit in its context. Of particular importance to this case, and the CPO and Side Roads Order, is that the masterplan includes built form at the southern end of the site in the early phases and the forthcoming planning application proposes implementation of a comprehensive flood risk and surface water drainage strategy across the Culham No 1 site that delivers drainage and sustainability benefits. However, the CPO in its current form proposes to acquire land at the southern end of the Culham No 1 site which could accommodate built development, and land expected to be involved in the implementation of a comprehensive drainage strategy serving the site. The overlap between the masterplan, and the land currently effected by the Orders can be seen at **Appendix 3** of my evidence.
- 3.12 In summary, the outline proposals are seeking to achieve:
- Up to 115,000sq.m of employment floorspace [Use Class B2, B8 and E(g)];
 - Up to 2,500sq.m of hotel floorspace (equating to approximately 100 hotel bedrooms) [Use Class C1];
 - Up to 600sq.m of retail floorspace [Use Class E(a) and (b)];
 - Up to 500sq.m of health club / gym floorspace [Use Class E(d)];
 - Up to 500sq.m of creche / children's nursery floorspace [Use Class E(f)]; and
 - Up to 800sq.m of restaurant / public house floorspace [Sui Generis].
- 3.13 The emerging proposals will comply with the South Oxfordshire Local Plan and specifically STRAT9 which requires the delivery of a minimum net gain of 7.3 ha of employment land.
- 3.14 Given that the Culham No.1 site already accommodates occupied employment development, development at the site can proceed before any transport interventions are completed. This point has been agreed with South Oxfordshire District Council and Oxfordshire County Council as part of pre-application discussions pursuant to the Culham No.1 application.
- 3.15 Given the accepted position that development at the Culham No 1 site can be served by existing access and transport arrangements, there is a need to ensure that any strategic highway works do not impede such development or delay its delivery.

4.0 COMPULSORY PURCHASE PROCESS AND THE CRICHEL DOWN RULES

- 4.1 The Department for Levelling Up, Housing and Communities has published guidance on Compulsory Purchase and The Cricchel Down Rules, July 2019 ("**CPO Guidance**").
- 4.2 Paragraph 2 of the CPO Guidance explains that:

Acquiring authorities should use compulsory purchase powers where it is expedient to do so. However, a compulsory purchase order should only be made where there is a compelling case in the public interest.

The confirming authority will expect the acquiring authority to demonstrate that they have taken reasonable steps to acquire all of the land and rights included in the Order by agreement. Where acquiring authorities decide to/arrange to acquire land by agreement, they will pay compensation as if it had been compulsorily purchased, unless the land was already on offer on the open market.

Compulsory purchase is intended as a last resort to secure the assembly of all the land needed for the implementation of projects...

When making and confirming an order, acquiring authorities and authorising authorities should be sure that the purposes for which the compulsory purchase order is made justify interfering with the human rights of those with an interest in the land affected. T

- 4.3 Paragraph 12 of the CPO Guidance confirms that a compulsory purchase order “*should only be made where there is a compelling case in the public interest*”.

- 4.4 Paragraph 13 of the CPO Guidance states that a minister confirming a CPO:

“has to be able to take a balanced view between the intentions of the acquiring authority and the concerns of those with an interest in the land that it is proposing to acquire compulsorily and the wider public interest. The more comprehensive the justification which the acquiring authority can present, the stronger its case is likely to be.

...It is not essential to show that land is required immediately to secure the purpose for which it is to be acquired, but a confirming minister will need to understand, and the acquiring authority must be able to demonstrate, that there are sufficiently compelling reasons for the powers to be sought at this time.

- 4.5 Paragraph 15 of the CPO Guidance states that:

“The acquiring authority will also need to be able to show that the scheme is unlikely to be blocked by any physical or legal impediments to implementation. These include:

- the programming of any infrastructure accommodation works or remedial work which may be required; and*
- any need for planning permission or other consent or licence*

Where planning permission will be required for the scheme, and permission has yet to be granted, the acquiring authority should demonstrate to the confirming minister that there are no obvious reasons why it might be withheld. Irrespective of the legislative powers under which the actual acquisition is being proposed, if planning permission is required for the scheme, then, under

section 38(6) of the Planning and Compulsory Purchase Act 2004, the planning application will be determined in accordance with the development plan for the area, unless material considerations indicate otherwise. Such material considerations might include, for example, a local authority's supplementary planning documents and national planning policy, including the National Planning Policy Framework."

- 4.6 Paragraph 44 of the CPO Guidance recognises that a confirming minister may confirm a compulsory purchase order with modifications provided that such modifications would not authorise the acquiring authority to compulsory purchase additional land without all interested persons providing consent (section 14 of the Acquisition of Land Act 1981).

5.0 CEG'S CASE

- 5.1 As is set out in the statement of case [**Core Doc. M3**], CEG's position regarding the HIF Scheme and the CPO, can be summarised as follows:

1. CEG does not object to the CPO or the HIF Scheme 'in principle.'
2. CEG is therefore supportive of the HIF Scheme in principle, particularly as the proposed highway works offer an opportunity to assist in the realisation of the significant social and economic benefits that the STRAT9 allocation (of which Culham No.1 is the first phase) will provide.
3. However, the current terms of the Orders extend beyond what is necessary to successfully deliver the HIF Scheme. In their current form, the Orders could adversely affect elements of the Culham No 1 development and which could come forward in advance of the HIF Scheme being completed

- 5.2 I do note, however, that it might be that CEG's objections can be addressed through appropriate modifications to the Orders, and/or completion of private agreements with the Council and relevant landowners. Such measures would enable the OCC's objectives in making the Orders to still be met, whilst avoiding the unnecessary acquisition of land through the CPO process.

The HIF Scheme in principle

- 5.3 As can be read in CEG's third party statement to the 'called-in' inquiry: its position on the issues identified by the Secretary of State is that the HIF Scheme:

- (1) will support significant economic growth and investment;
- (2) will support the delivery of a substantial amount of much needed new homes;
and

- (3) is directly supported by – and in accordance with – the development plan, and other material considerations, including the Local Transport Plan, and the National Planning Policy Framework.
- 5.4 In particular, the HIF Scheme will support the delivery of the STRAT9 allocation, the first phase of which – the Culham No.1 site – has been the subject of extensive preapplication discussion with the district and county councils and has been the subject of an environmental assessment.
- 5.5 CEG understands the complexities of delivering infrastructure projects, such as the HIF Scheme, and understands the general need for CPO and Side Roads Order in this case. CEG does not object to the principle of CPO, however there are matters of detail relating to the interplay between these Orders (in their current form) and the proposed development of the Culham No 1 site which could raise significant issues as outlined hereunder.

Built form and layout of Culham No.1 site

- 5.6 As can be seen at **Appendix 2** of my evidence CEG, and its consultant team has produced an indicative masterplan for the Culham No 1 site and which will form the basis of the forthcoming planning application for development of the same. This indicative masterplan is the result of significant amounts of technical work, including landscape assessment, drainage (more on this below), ecology, design (inc. layout and massing), and commerciality (the types of employment development that the market is demanding). The masterplan has also necessarily considered the efficient use of land, and not allowing development to be properly delivered across the Culham No.1 site risks the need for greater land use elsewhere to meet the overall needs for employment development as set out in the South Oxfordshire Local Plan.
- 5.7 The indicative masterplan anticipates built development at the southern end of the Culham No.1 site, fronting the road. This part of the development is directly affected by the extent of the land currently proposed to be acquired through the CPO as can be seen in the Overlay Plan in my **Appendix 3**.

Drainage

- 5.8 In respect of drainage matters Mr Swann explains in his evidence, in summary, that:

[The drainage scheme for Culham No.1] has to be considered as a whole from initial concept to first submission for planning and beyond.

For this proposed development, the CPO plots affected and detailed in paragraph 2.2 lie adjacent to the discharge point to the existing water courses. It also forms a crucial area of material for the cut and fill requirements of the proposed development when balancing materials and rationalising plateaus for future construction and therefore the creation of a basin in the CPO plots affected.

As is usual for developments of this nature, regardless of where development may start, strategic earthworks and drainage infrastructure are constructed in the first phases of work. Once complete then secondary infrastructure such as services roads and then the main buildings are programmed and can be delivered.

If the CPO plots affected are to be returned at some unspecified date, it will still be necessary to construct temporary drainage measures along with unnecessary borrow pits in land that would have otherwise had been developed for employment use in the early stages of development. This will be required so that drainage is always available and that an earthwork balance can be achieved while the CPO plots affected are vested in the County Council. Once the land is returned then further works will need to be undertaken to establish development and drainage in this area akin to the original masterplan. This effectively is either abortive works and or alteration and double handing of materials which, not only have a and increased cost and viability implication for the Site, but also has safety implications due to the abortive and unnecessary works required to develop the site in two stages.

If the CPO plots affected are not returned and remains within the highway then the development area would be reduced from that seen today, with an unnecessary unused swathe of open land between the development and highway.

To lose control of over 1ha of land from the proposed development and have that land placed in effective limbo with no defined timescale for its return and without discussion with CEG or the landowners before the CPO stage, is not conducive to effective infrastructure planning and more importantly compliant drainage design. The County Council have also not demonstrated why it is necessary for the works compound to be sited in the currently proposed location. Indeed, CEG have with both Brookbanks and other members of the development team, identified alternative area within the proposed development that could accommodate works compound areas which do not require holistic consideration for either infrastructure or drainage. In addition these areas that lie within land under the same ownership as the land proposed to be taken via CPO for compound purposes, and that both promoter and landowner have expressed a readiness to work with OCC and appointed contractors to essentially 'swap' these areas.

- 5.9 In short, OCC is seeking to permanently acquire land compulsorily which is expected to be utilised in the delivery of the first phase of the Culham No 1 development. That development is allocated in the South Oxfordshire Local Plan and is capable of being delivered in advance of the HIF Scheme being completed. As Mr Swann explains in his evidence, alternative drainage solutions that would not involve the land proposed to be acquired are not optimal to the efficient delivery of significant employment development on the Culham No.1 Site.
- 5.10 Supporting the delivery of housing and employment growth at allocated strategic sites is central to the HIF Scheme's defined objectives (paragraph 5.1 of OCC's Statement of Case). It is therefore acknowledged by all parties that the specific terms of the

Orders and the extent of land proposed to be compulsorily acquired should not unnecessarily impede development at such sites that could otherwise proceed.

Planning policy implications

- 5.11 Culham Science Village (and its first phase on the Culham No.1 site) is allocated for development under Policy STRAT9: Land Adjacent to Culham Science Centre, of the adopted South Oxfordshire Local Plan.
- 5.12 I also note that South Oxfordshire and the Vale of White Horse District Councils are midway through producing a new joint Local Plan to cover both authority areas. The Councils' preamble to the Joint Plan explains that it will guide the kinds of new housing and jobs needed and where they should go, informing planning application decisions for the districts. In the Joint Local Plan, the Councils' are developing planning policies that are aimed at helping to address their declared "climate emergency," restore nature, and approach the delivery of low-carbon homes with the right infrastructure to go with it.
- 5.13 Against this backdrop of sustainable growth in the emerging Joint Plan, the STRAT9 site (site reference AS2 in the emerging Joint Plan) is proposed to be retained as a development allocation, and land for the HIF Scheme continues to be safeguarded for its delivery. The drafted policies are very similar to those in the extant Local Plan:
- Proposed Policy AS2 - Land adjacent to Culham Science Centre
 - Proposed Policy AS11 - Culham Science Centre
 - Proposed Policy IN3 – Transport infrastructure and safeguarding
- 5.14 I note that there is a revised criterion in proposed Policy AS2 which states:
- "...2) Proposals for the development must demonstrate:*
- ...
- ... b) how the site will retain and optimise the employment use of the Culham No.1 site..."*
- 5.15 Clearly then, Culham Science Village (and increasingly the Culham No.1 Site) is a vital part of the overall strategy of the development plan (both extant, and emerging) for the area. The objectives of the HIF Scheme are proposed, in part, to support the delivery of development at Culham.
- 5.16 Allocated development at Culham (both in STRAT8 and STRAT9) and the HIF Scheme should not then be mutually exclusive. The extent of land acquired through the CPO and the proposed timings for acquisition should therefore align with the proposed layout and delivery programme for the STRAT 9 allocation. In its current form, the CPO unnecessarily proposes to acquire land involved in the delivery of the early phases of the Culham No.1 scheme, and which could result in less preferable design solutions needing to be pursued. Such an approach would not be conducive to comprehensive strategic planning and would undermine the objectives of the Orders in wanting to (amongst other matters) facilitate employment growth at strategic sites.

- 5.17 Turning to the specifics of the extant site allocation policy, STRAT9 sets out the following:

Land within the strategic allocation adjacent to Culham Science Centre will be developed to deliver approximately 3,500 new homes, with approximately 2,100 homes within the plan period, a net increase of at least 7.3 hectares of employment land in combination with the adjacent Science Centre, 3 pitches for Gypsies and Travellers and supporting services and facilities.

- 5.18 The principle of, and need for, development I have dealt with above, and I have not set out the full policy text for STRAT9 here, but the remaining text provides details about how development will be delivered in an acceptable way. However, there is no specific reference to flood management or surface water drainage. For this, one must turn to Policy EP4: Flood Risk which states:

Policy EP4: Flood Risk

1. *The risk and impact of flooding will be minimised through: i) directing new development to areas with the lowest probability of flooding; ii) ensuring that all new development addresses the effective management of all sources of flood risk; iii) ensuring that development does not increase the risk of flooding elsewhere; and iv) ensuring wider environmental benefits of development in relation to flood risk.*
2. *The suitability of development proposed in Flood Zones will be strictly assessed using the 'Sequential Test' and where necessary the 'Exceptions Test'. A sequential approach should be used at site level.*
3. *A site-specific Flood Risk Assessment (FRA) should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1 a FRA should accompany all proposals involving:*
 - *sites of 1 hectare or more;*
 - *land which has been identified by the Environment Agency as having critical drainage problems;*
 - *land identified in the Strategic Flood Risk Assessment as being at increased flood risk in future; or*
 - *land that may be subject to other sources of flooding, where development would introduce a more vulnerable use.*
4. *All development proposals must be assessed against the current South Oxfordshire Strategic Flood Risk Assessment or any updates and the Oxfordshire Local Flood Risk Management Strategy to address locally significant flooding. Appropriate mitigation and management measures must be implemented and maintained.*
5. *All development will be required to provide a Drainage Strategy. Development will be expected to incorporate Sustainable Drainage Systems and ensure that run-off rates are attenuated to greenfield run-off rates. Higher rates would need to be justified and the risks quantified.*

Development should strive to reduce run-off rates for existing developed sites.

6. Sustainable Drainage Systems should seek to enhance water quality and biodiversity in line with the Water Framework Directive.

- 5.19 The above policy requires all development to be assessed against a Strategic Flood Risk Assessment, provide a drainage strategy, and seek to enhance water quality etc. The proposed development scheme for the Culham No.1 Site includes all these elements. The currently envisaged drainage strategy would involve land that is currently included within the CPO boundary. Such land would be permanently acquired through the CPO, notwithstanding the fact that OCC would only require the use of such land temporarily during the construction stage of the HIF Scheme.
- 5.20 Mr Swann explains in his evidence that there are other drainage strategy options. However, these are all less preferable in terms of cost and delivery timings. The drainage infrastructure for the entire Culham No 1 site will also be designed / installed at the outset, so will form part of the early phase work. Moreover, as I have explained above, early phases of Culham No.1 site can proceed in advance of the HIF scheme, so there is a risk that the Orders could unnecessarily impede upon the Culham No.1 scheme. Once again, I note that this is particularly pertinent as the Culham No.1 Site is an employment generating scheme, and the first phase of a wider strategic allocation, which the case for the HIF Scheme is explicitly pertaining to support.

Alternative locations for the works compound.

- 5.21 Turning to the use of the land, which is proposed to be subject to CPO. I note that Council only needs the relevant land referred to in the Orders temporarily during the construction phase to accommodate works compounds. There are other possible locations for the compound, and the Council does not need to therefore acquire this land. Such alternative locations for the compound would enable the construction of the HIF Scheme and the Culham No.1 scheme to be completely compatible with one another.
- 5.22 CEG and its consultant team has proposed to OCC an alternative location for its works compound which would avoid the Council needing to compulsorily acquire plots 16/6a, 16/6b, 16/c and 16/6z , and this is shown in purple hatching on the overlay plan at **Appendix 3** of this evidence. If OCC was to utilise this alternative location, then the comprehensive drainage strategy currently envisaged by the Culham No 1 development could be fully implemented.
- 5.23 In light of the above, the CPO boundary should be amended to reflect that shown green on the Sheet 16 overlay plan at **Appendix 4**.

Residential-Led Development within the STRAT9 Allocation

- 5.24 Land forming part of the STRAT 9 allocation and which is located to the west of the railway track is intended to be brought forward for residential-led development through later phases (**the Residential Led-Development**). A planning application has yet to

have been prepared for the Residential-Led Development. However, it is noted from Sheet 14 of the CPO Map and Sheet 4 of the General Arrangement Plan that the CPO proposed to acquire a large area of land upon which HIF Scheme works would not be delivered (plot 14/1a).

- 5.25 It is understood that OCC proposes to acquire such land for the provision of a temporary works compound during the construction phase of the HIF Scheme. However, and in light of the defined objectives of the HIF Scheme discussed above, it is important to ensure that the CPO does not unduly affect or impede the Residential-Led Development. As discussed in its Statement of Case, CEG and the relevant landowner(s) remain willing to discuss the terms of a licence that would enable OCC to use plot 14/1a for a construction compound during the HIF Scheme's construction phase.
- 5.26 Given that the use of the land for OCC's required purposes could be secured by private agreement, the use of compulsory purchase powers in respect for this plot is unnecessary and unjustified. The CPO boundary should be modified to reflect the boundary shown on the Sheet 14 overlay plan at **Appendix 4**.

Objections to the Side Roads Order

- 5.27 CEG's objections to the Side Roads Order are discussed in section 5 of its Statement of Case and are maintained. As is discussed above, phases of the Culham No 1 development will be able to proceed in advance of the HIF scheme being completed. It is therefore important to ensure that enforceable arrangements are secured at this time to provide occupiers of the Culham No 1 site with rights of access to the public network at all times, both during the HIF scheme construction phase and following. Sufficient private rights must also be granted over proposed private access routes. Completion of an appropriate private agreement with the relevant landowner(s) would enable the proposed north-easterly access towards Culham Campus to be removed from the CPO and Side Roads Order.

6.0 SUMMARY AND CONCLUSION

- 6.1 CEG does not object to the CPO or the HIF Scheme in principle. Indeed, CEG acknowledges that additional highway capacity will be necessary to accommodate all of the STRAT 9 development (of which Culham No.1 is the first phase) and mitigate the effects of other proposed development schemes in the locality, although the current vehicle movements across the site indicate that some redevelopment of the Culham No.1 Site can be delivered and occupied before the highway improvements proposed by the HIF Scheme are delivered.
- 6.2 CEG is therefore supportive of the HIF Scheme in principle, particularly as the proposed highway works offer an opportunity to assist in the realisation of the significant social and economic benefits that the Proposed Development will provide.

- 6.3 However, the CPO currently proposes to unnecessarily acquire land for temporary purposes which is involved with the delivery of the early phases of the Culham No 1 development, and which can come forward in advance of the HIF development being completed. Such land is intended to be utilised by OCC for works compounds in constructing the HIF Scheme. However, other land can be utilised for the provision of such compounds, and the landowners are willing to discuss the terms of a licence that would enable OCC to occupy such land for its required purposes.
- 6.4 The compulsory acquisition of plots 16/6a, 16/6b, 16/c and 16/6z is therefore unnecessary. There is no compelling case in the public interest to compulsorily acquire such land in the context of there being other land available that can be made available to and utilised by OCC during the construction phase of the HIF scheme. The CPO should therefore be modified to reflect the boundaries shown in green on the sheet 14 and sheet 16 overlay plans included at **Appendix 4**.
- 6.5 Revisions should be made to the Side Roads Order to reflect the revised CPO boundaries, with enforceable commitments provided by OCC in ensuring that occupiers of the Culham No 1 site have sufficient rights of access to the public network and over private roads both during the HIF scheme construction phase and following.

APPENDIX 1: CV: STEVEN JOHN SENSECALL



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Steven is Head of Carter Jonas' Planning & Development Team in the south and south-west having joined the firm in May 2017 as part of the acquisition of Kemp & Kemp. He leads a team of 22 planning and development professionals working for a wide variety of public and private sector clients for whom the firm provides planning and development consultancy services on a national basis.

Steven is an equity partner and was until recently, the Oxford 'Head of Office'. He is also a member of the firm's Planning & Development Board.

Steven appears regularly at Planning Inquiries and Development Plan Examinations in Public as both an advocate and expert witness. He is also a frequent speaker on planning matters.

Primary Skills

- Strategic Planning & Development Advice
- Site-wide masterplans
- Securing planning permissions
- Development plans
- Expert Witness
- Advocacy

Awards: 2022 Oxfordshire Property Festival Awards Property Leader of the Year

Examples of Current and Recent Experience

- Led the professional team appointed by the landowners and a promoter to secure a housing allocation and outline planning permission for 1,500 new homes and associated infrastructure on land at Crab Hill, Wantage in Oxfordshire.
 - Acting for Berkeley Strategic in the promotion of land at Broadwater Farm, Tonbridge & Malling for circa 900 new homes and leading the professional team currently preparing an outline planning application consistent with a draft Local Plan allocation.
 - Secured an allocation on Green Belt land in the South Oxfordshire Local Plan 2035 for circa 3,500 new homes with associated services and infrastructure, including improvements to the rail network. Now heading up the professional team instructed to prepare and submit an outline planning application pursuant to the allocation.
 - Promoting land for inclusion in emerging Local Plans in Wiltshire, North Somerset, Staffordshire, Kent, Oxfordshire and Dorset for circa 10,000 new homes and new employment-generating development.
 - Acted for Berkeley Homes (Oxford & Chiltern) Limited and leading the professional team in securing planning permission in respect of a hybrid application (part outline, part detailed) for 750 homes on land at Warfield near Bracknell.
 - Acted as lead consultant in securing outline planning permission on behalf of Lands Improvement
-

Holdings Ltd for a scheme for 550 homes and a 23-hectare business park on land at Oteley Road South, Shrewsbury.

- Secured on allocation in the St Edmundsbury Plan for circa 1,300 new homes on land at Bury St Edmunds in Suffolk and subsequently secured an outline permission on appeal pursuant to that allocation.
- Advising a large US corporation on proposals for new data centres across the UK.
- Acting for Herford College and the University of Oxford on a scheme for graduate accommodation and academic space.
- Retained for over 25 years by the United Kingdom Atomic Energy Authority (“UKAEA”) and then by Harwell Campus Partnership to deal with all planning and development matters relating to Harwell, Oxford. Notable successes include:
 - Co-authorship of *Laying the Foundations*, which set out the blueprint for the redevelopment of the Harwell Oxford Campus
 - Securing a site-wide employment and housing allocation in the Vale of White Horse Local Plan
 - Securing detailed planning permission for over 90,000 square metres of new science and technology related development
 - Securing detailed planning permission for Diamond Synchrotron
 - Securing detailed planning permission for the Vaccines Manufacturing and Innovation Centre
 - Securing planning permission for Moderna for a new Vaccines Manufacturing and research Facility
- Retained for over 25 years by the UKAEA to provide planning consultancy services in connection with Culham Science Centre (CSC). Notable successes include:
 - Securing the removal of CSC from the Green Belt and the allocation of the site in the SODC Local Plan 2035 as a strategic employment site
 - Renewing/extending the Joint European Torus temporary permissions to allow the continued operation of that facility.
 - Working up and agreeing a Masterplan Framework for the CSC as a whole and agreeing the same with officers from SODC as the basis for a Supplementary Planning Document (SPD) for the site
 - Securing planning permission for 9,000 square metres of new Class B1 development
 - Securing planning permission for a new Remote Applications in Challenging Environments (RACE) building
 - Securing planning permission for a new Materials Handling Facility and the National Fusion Technology Platform
 - Securing planning permission for the General Fusion Research Facility
- Acted for the Defence Infrastructure Organisation in the promotion through the development plan process of an army barracks (and former airfield) at Abingdon in Oxfordshire. Secured the removal of the site from the Green Belt and allocation for circa 2,750 homes. Now heading up the team preparing an outline planning application.

- Secured an allocation in the recently adopted Cherwell Local Plan for circa 300 new homes on land at Begbroke in Oxfordshire. Now leading the team appointed to progress an outline planning application pursuant to the allocation.
- Securing a Local Plan application for Müller UK for some 31 hectares of new employment development at Market Drayton in Shropshire and then pursuing an outline planning application for a new 1,100 sqm, 28-metre-high production facility, planning permission for which was secured.
- Acting for the University of Oxford in seeking planning permission for the new £2000m Humanities Building in the Radcliffe Observatory Quarter, Oxford.
- Currently advising the University of Oxford on plans to demolish and redevelop student accommodation in the heart of the City's Central Conservation Area and to replace the demolished building with new student accommodation and academic space.
- Currently advising a number of Oxford College's on strategic planning & development issues and a range of site-specific proposals.
- Currently advising clients at a strategic level on Science & Technology related development and the Life Sciences sector in Oxford and across the Oxford – Cambridge Arc.

Qualifications

- Member of the Royal Town Planning Institute
- Graduate Diploma Planning for Urban Conservation and Renewal
- BA (Hons) Planning Studies

Career

- 2017 to present: Equity Partner, Carter Jonas
- 1982 to 2017: Kemp & Kemp LLP

APPENDIX 2: INDICATIVE CULHAM NO 1 MASTERPLAN



CULHAM NO.1 SITE INDICATIVE MASTERPLAN

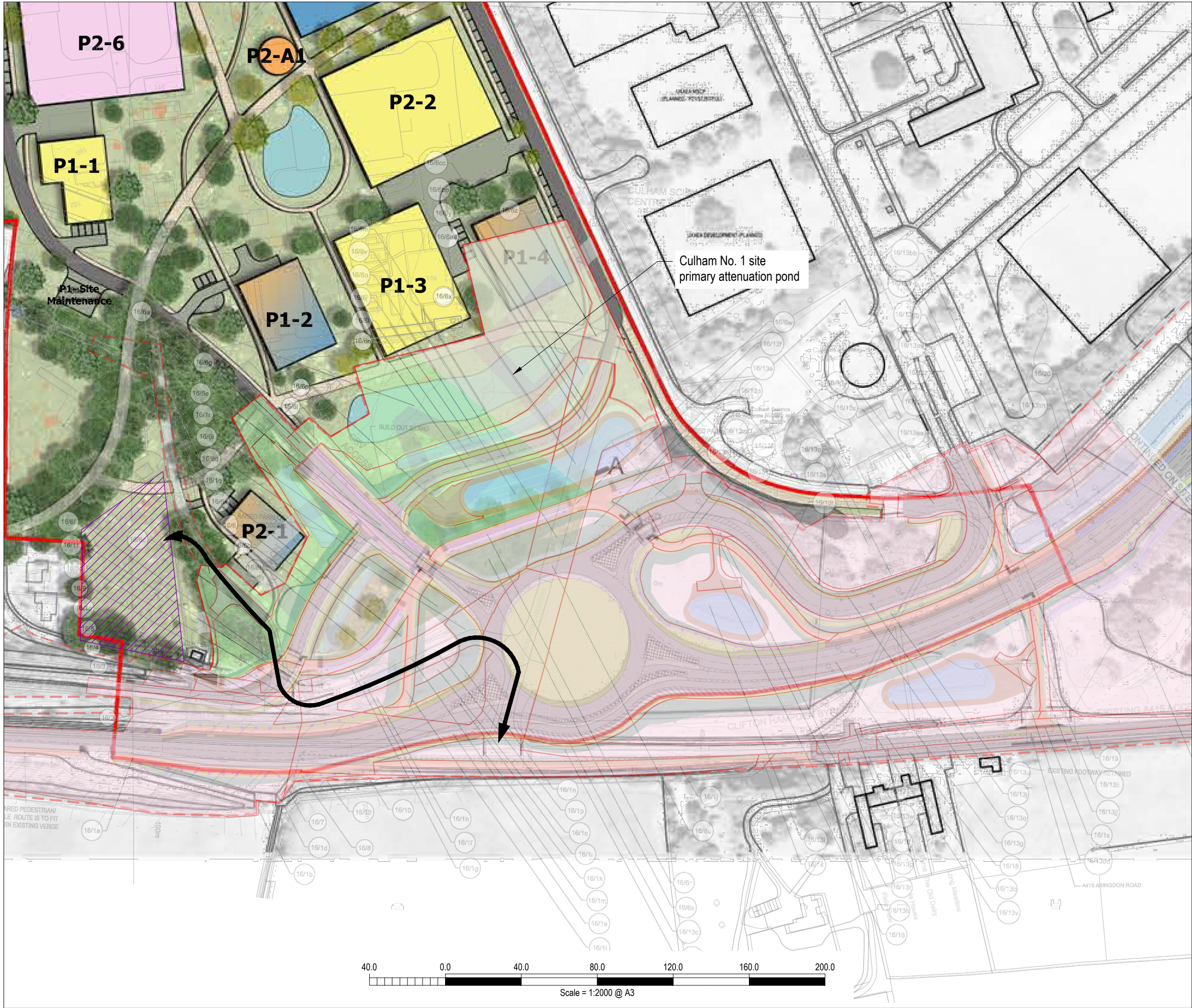
- SITE NO.1 BOUNDARY
- EXISTING TREES
- PROPOSED TREES
- PROPOSED ACID GRASSLAND
- EXISTING LANDSCAPING
- AMENITY BUILDING
- MIXED USE AMENITY / LAB/ OFFICE
- LAB / OFFICE
- LIGHT INDUSTRIAL
- MIDTECH
- DECKED PARKING

nbbj

CEG CULHAM SCIENCE PARK
 ISSUE DATE: 28th September 2022
 DRAWING NUMBER:
 CUL1-NBBJ-ZZ-00-DR-A-011001



**APPENDIX 3: INDICATIVE MASTERPLAN FOR CULHAM NO 1 OVERLAID WITH THE
CPO BOUNDARY**



- NOTES**
1. This drawing is to be read in conjunction with all relevant documents and specifications.
 2. Dimensions are not to be scaled.

Source: AECOM's drawing number
GEN_PD-AMC-GEN-DGT_ZZ_ZZ-DR-T-0016 Rev P02.
NBBJ's drawing number CUL-NBBJ-ZZ-00-DR-A-011001
Oxfordshire County Council drawing numbers
GH-132861001-LOLP-LEDA-1 P02.2 - 1
GH-132861001-CPO-16-FINAL P01 - 1

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KEY

- Land to be acquired permanently
- Land to be acquired temporarily
- Alternative compound location
- Access route (based upon existing access road / highway arrangements)



A	CPO overlay updated.	04/10/2023 T. Hart	TF
Rev.	Description	Date	Chkd



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Client : CEG

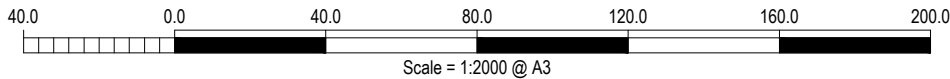
Project : Culham

Title : CPO Extents Overlay
Alternative Site Compound Location

Project Engineer : T. Hart Scale : 1:2000 @ A3
Project Director : T. Foxall Date : March 2023
Status : INFORMATION

Drawing No. 8150529/6011 Rev A

APPENDIX 4: SHEET 14 AND SHEET 16 OVERLAY PLANS




- NOTES**
1. This drawing is to be read in conjunction with all relevant documents and specifications.
 2. Dimensions are not to be scaled.

Source: AECOM's drawing number
GEN_PD-AMC-GEN-DGT_ZZ_ZZ-DR-T-0016 Rev P02.
Oxfordshire County Council drawing number
GH-132861001-CPO-16-FINAL

- KEY**
- Current extent of CPO
 - Suggested alternative CPO extents

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original scope of this project.



Rev.	Description	Date	Chkd
<div><div>Glanville Cornerstone House 62 Foxhall Road, Didcot Oxon, OX11 7AD Tel: (01235) 515550 Fax: (01235) 817799 postbox@glanvillegroup.com www.glanvillegroup.com</div></div>			
Client :		CEG	
Project :		Culham	
Title :		CPO Extents Overlay - Culham No.1 Site Access	
Project Engineer :		T. Hart	Scale : 1:2000 @ A3
Project Director :		T. Foxall	Date : March 2023
Status :		INFORMATION	
Drawing No. 8150529/6007			Rev