

**CALLED IN PLANNING APPLICATION:
CORRIDOR BETWEEN THE A34 MILTON INTERCHANGE
AND
THE B4015 NORTH OF CLIFTON HAMPDEN**

PINS REFERENCE: APP/U3100/V/23/3326625

**INTERESTED THIRD PARTY STATEMENT
ON BEHALF OF CEG**



JANUARY 2024

Carter Jonas

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1.0 INTRODUCTION

- 1.1 This statement is submitted to the Inquiry on behalf of CEG. Carter Jonas LLP is instructed by CEG.
- 1.2 CEG is promoting land adjacent to Culham Campus (Policy STRAT9), known as Culham Science Village, for approximately 3,500 homes (at least 2,100 up to 2034) and a net increase of at least 7.3ha of employment land, with associated infrastructure, services and facilities.
- 1.3 CEG promoted the site opportunity through the production of the South Oxfordshire Local Plan, making representations in response to the consultations held on the informal (Regulation 18) Plan and the two versions of the Publication Plan (Regulation 19). Ultimately, CEG worked closely with South Oxfordshire District Council to secure a ‘sound’ development allocation in the now-adopted Local Plan.

The scheme

- 1.4 The scheme the subject of the inquiry is known as The Didcot Garden Town HIF Scheme (“**the 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.’

- 1.5 Oxfordshire County Council (“**OCC**”) is promoting the Scheme. Pursuant to Regulation 3 of the Town and Country Planning General Regulations, OCC applied to itself for planning permission for the Scheme. The application for planning permission for the Scheme was considered by OCC’s Planning & Regulation Committee (“**the Committee**”) at a meeting held over two days; namely, the 17th and 18th of July. The Committee resolved to refuse the Application and to refuse to grant planning permission for the Scheme.
- 1.6 Before OCC issued a decision notice to give effect to the Committee’s resolution, the Secretary of State for Levelling Up, Housing and Communities (“**the Secretary of State**”) called in the Application pursuant to s.77 of the Town and Country Planning Act 1990 (“**TCPA 1990**”) on 25 July 2023.

1.7 The Committee met again on 27th September 2023 to consider a further report from OCC's officers. The report:

- 1) explained the Secretary of State's call in; and
- 2) sought to refine what OCC's reasons for refusal would have been, had the Application been determined by OCC.

1.8 At that meeting, the Committee agreed that its final reasons for refusal would have been (in summary):

Reason 1 – The Climate Change Committee's June 2023 Report to Parliament had not been properly taken into account in the application.
"This could be managed by an appropriate condition."

Reason 2 – Lack of Very Special Circumstances for the development set against Green Belt Policy.
"Not maintained."

Reason 3 – The impact of traffic on Abingdon and Didcot had not been assessed in the application.
"The committee maintains a concern about this and asks in reaching their recommendation to the Secretary of State, the inspector only recommended approval if they were satisfied that the traffic modelling carried out had robustly examined."

Reason 4 – Noise impacts on Appleford.
"The committee maintains a concern about this and asks in reaching their recommendation to the Secretary of State, the inspector only recommended approval if they were satisfied that the benefits did outweigh the harms."

Reason 5 – The absence of a Health Impact Assessment
"Not maintained."

Reason 6 – The harm to landscape.
"This could be managed by an appropriate condition."

Reason 7 – The Science Bridge was not of adequate design for a gateway feature to Didcot.
"This could be managed by an appropriate condition."

Reason 8 – Conflict with policy of the Council's Local Transport and Connectivity Plan 2022-2050.

"The committee maintains a concern about this with regard to how the applicant had approached the traffic modelling for a new road scheme contrary to the policies of the LTCP and ask that, in reaching their recommendation to the Secretary of State, the inspector should only recommend approval to the

application if they were satisfied that, having considered the evidence put forward, the traffic modelling for the proposed new road had adopted a 'Decide and Provide' approach or that, if it was concluded it had not or had done so inadequately, that this did not outweigh the strong support for the development provided in the development plan as a matter of principle."

1.9 It is now understood that OCC's position as the Planning Authority is as follows:

*"...in view of the additional information now provided by the applicant in their own Technical Note requested by the Inspector, the Origin review also demonstrates that the remaining concerns in relation to reasons for refusal 3 and 8 have now been addressed."*¹

1.10 Notwithstanding the position of OCC as the Planning Authority, the Secretary of State has indicated the matters which he particularly wishes to be informed about for the purposes of his consideration of the application are:

- (1) the extent to which the proposed development is consistent with Government policies for delivering a sufficient supply of homes as set out in the NPPF (Chapter 5); and
- (2) the extent to which the proposed development is consistent with Government policies for building a strong, competitive economy as set out in the NPPF (Chapter 6); and
- (3) the extent to which the proposed development is consistent with the development plan for the area; and
- (4) any other matters the Inspector considers relevant.

1.11 Regarding matter (4), the Inspector has identified (at the Pre-Inquiry Meeting) the following relevant other matters:

- (1) whether the extent of traffic modelling is robust, including wider traffic impacts and consideration of Oxfordshire County Council's Local Transport and Connectivity Plan ("the LTCP");
- (2) the effect of the proposal's carbon impact and contribution to climate change;
- (3) the effect of noise from the proposal upon the living conditions of people living and working in Appleford;
- (4) whether the design for the Science Bridge is suitable; and
- (5) whether there are any reasonable alternatives.

¹ See most recent Technical Note

The Inspector's Main Issues

- 1.12 The Inspector has also indicated, via a letter dated 12th January 2024, that the following are likely to be the "Main Issues" in this case:
- (1) The need for and benefits of the scheme
 - (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
 - (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)
 - (4) Consideration of alternatives
 - (5) The effect of the proposal on the character and appearance of the surrounding landscape, including any loss of trees and/or hedges
 - (6) Whether the proposal would be acceptable in terms of impacts on noise
 - (7) Whether the proposal be acceptable in terms of air quality
 - (8) The effect of the proposal on climate change and carbon emissions
 - (9) Whether the proposed bridge would deliver the high-quality design sought by the Framework and development plan policies
 - (10) The effect of the proposal on biodiversity, including Biodiversity Net Gain and whether a Habitat Regulations Assessment (HRA) Screening should be undertaken for Cothill Fen Special Area of Conservation (SAC) and Little Wittenham SAC.
 - (11) The effect of the proposal on the significance of heritage assets
 - (12) Whether the proposed scheme would be safe from flooding over its lifetime and the effect on flood risk elsewhere. I shall also need to understand arrangements for the management and maintenance of any surface water management features.
 - (13) The effect of the proposal on the Green Belt
 - (14) Other policy matters and the overall planning balance
- 1.13 This statement is structured around the matters on which the Secretary of State wishes to be informed but in addressing those matters, where it is necessary and appropriate to the CEG case, it cross refers to the Inspector's main issues.
- 1.14 To assist the Inquiry, this statement presents the strategic case for the HIF Scheme as it is necessary to support the allocated housing and employment growth at Culham Science Village.

2.0 THE CASE FOR CEG

2.1 CEG supports the Scheme and submits that planning permission should be granted.

2.2 The Scheme will:

- (1) meet a critical need for improved infrastructure in the District;
- (2) support the delivery of essential sustainable development within the District; and
- (3) as a result, unlock the delivery of significant economic, social and environmental benefits within the District and more widely, across the UK.

2.3 The impact of the Scheme on the development of STRAT9 will be to support economic growth; the provision of new employment opportunities; and the delivery of significant levels of new homes. These homes will help to meet the needs of communities in South Oxfordshire, but also across the whole county. Moreover, the location of STRAT9, and in particular the Culham No.1 site, adjacent to one of the largest employment locations in Oxfordshire – and a location critical to Research and Development, UK plc, and specifically Fusion Power – makes it a very sustainable location for further growth to consolidate what is already an internationally-significant cluster location. STRAT9 is the truest example of sustainable development and underlines the beneficial impact of co-locating homes and jobs.

3.0 CEG

3.1 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

3.2 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.

3.3 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.

3.4 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.

4.0 CULHAM SCIENCE VILLAGE

- 4.1 The STRAT9 Site is situated to the north of Appleford-on-Thames, north east of Culham, south east 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.
- 4.2 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.
- 4.3 CEG is working closely with the UKAEA to maximise the benefits of the juxtaposition of Culham Campus, and the innovative technologies being explored there, its employment opportunities and the adjacent innovative mixed-use community.
- 4.4 The guiding vision for the Culham Science Village (STRAT9) 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

- 4.5 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.

- 4.6 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. As such, the Site is an existing and operational employment site.
- 4.7 The Site is located to the north of the A415 Abingdon Road. The only vehicular access to the Site is from the A415.
- 4.8 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.
- 4.9 The Site is generally flat, rising slightly where it meets the A415.
- 4.10 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 further consolidate what is already a significant 'cluster' location adjacent to Culham Campus and meet an identified need in the Oxfordshire science market.
- 4.11 The emerging landscape-led proposals seek to work with the existing site features and constraints to make the development fit in its context.
- 4.12 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].
- 4.13 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, plus the retention of the 10 ha of employment land currently in operation at the No.1 Site. The balance of the STRAT9 development, including the 3,500 dwellings and community and civic infrastructure will be delivered as part of the wider STRAT9 site west of the railway line.
- 4.14 Given the current use of the Culham No.1 site there is some redevelopment potential before any transport interventions (in essence, the HIF1 works) are necessary. This point has been agreed with South Oxfordshire District Council and Oxfordshire County Council as part of pre-application discussions pursuant to the No.1 application. However, the HIF1 Scheme is required to enable the delivery of the totality of the STRAT9 allocation.

5.0 NATIONAL PLANNING POLICY AND GUIDANCE

- 5.1 Section 70(2) of the Town & Country Planning Act 1990 requires that in dealing with an application for planning permission "*the authority shall have regard to the provisions of the development plan, so far as material to the application.*" Consideration also

needs to be given to Section 38(6) of the Planning and Compensation Act 2004, which states that:

“if regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise”

5.2 These statutory provisions are reflected in paragraph 2 in the Framework, which states that:

“Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise”.

5.3 The Framework is a relevant material consideration in the consideration and determination of this appeal.

National Planning Policy Framework (2023)

Achieving Sustainable Development

5.4 Paragraph 7 states in the Framework that the purpose of the planning system is to contribute to achieving sustainable development of which there are three dimensions – economic, social and environmental. Paragraph 8 sets out the three roles:

- a) *“an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
- c) *an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

5.5 At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both the plan-making and decision-taking process. Paragraph 11 confirms that this means approving development proposals that accord with the development plan without delay.

5.6 **CEG is of the view that the Scheme represents “sustainable development” consistent with the meaning of that phrase in the Framework. Indeed, CEG notes that the Department for Transport’s Draft National Policy Statement for National Networks states that:**

3.3 *Evidence that development on the network leads to induced demand is limited. A recent literature review suggested that the scale of any induced demand is likely to vary depending on circumstances. Under Department for Transport’s Transport Appraisal Guidance, government-funded investments in transport schemes need to consider the effects of variable demand (and the resultant induced or suppressed traffic) on the justification for intervention.*

3.4 *On roads, poor network performance, in the form of congestion or unexpected delays undermining reliability, has many costs. These costs include constraining economic activity by increasing costs to businesses and can constrain job opportunities if they limit access to labour markets. It causes frustration and stress for users.*

5.7 **This statement also demonstrates, below, that the Scheme conforms with the Development Plan and that accordingly it should be approved without further delay.**

Housing

5.8 Paragraph 60 confirms the Government’s objective to significantly boost the supply of homes using a sufficient amount of varied land where necessary, avoiding unnecessary delay.

5.9 Paragraph 74 specifically explains that:

“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).”

5.10 The same paragraph has further advice when considering large scale development and this includes:

“a) consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains;”

- 5.11 **CEG believes that it is quite plain that Culham Science Village fits squarely into the growth envisaged by the Framework at paragraphs 60, and 74. Culham Science Village will deliver a substantial amount of new residential development that is already in a sustainable location: co-located with employment, and with the added benefit of an existing railway station. The HIF investment in infrastructure and delivery of the Scheme provides an opportunity to support the development of the STRAT 9 allocation.**

Building a strong, competitive economy

- 5.12 The Framework provides a narrative in terms of building a strong competitive economy, (see chapter 6). Paragraph 85 of the Framework explains that 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 same paragraph goes on to specifically cite that support for economic growth 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.
- 5.13 Footnote 44 in the Framework adds that *“driving innovation”* emerges from The Government’s Industrial Strategy sets out a vision to drive productivity improvements across the UK, identifies a number of Grand Challenges facing all nations, and sets out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility; and catering for an ageing society. HM Government (2017) Industrial Strategy: Building a Britain fit for the future.
- 5.14 **It is CEG’s firm view that that the HIF Scheme is important to support the delivery of the STRAT 9 allocation that will deliver high quality employment development and a mix of units designed to meet identified demand. More generally the HIF Scheme, will also support the continued growth development of science and R&D industry in which the UK is a global leader, and critical to the economy of the UK, and its future innovation and diversification.**
- 5.15 CEG also notes that at paragraph 86 in the Framework it states that planning policies should:

“c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment...”

- 5.16 **This statement from CEG demonstrates that the relevant development plan for the area contains policies precisely to address infrastructure barriers which could stymie or impede economic growth and investment. The HIF Scheme represents the delivery of these policies.**

Promoting sustainable transport

- 5.17 Chapter 9, and paragraph 108, of the Framework explains how transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) *“the potential impacts of development on transport networks can be addressed;*
- b) *opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) *opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) *the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) *patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.”*

- 5.18 **CEG is of the firm view that the Scheme is the result of evidenced based work which emerged through strategic local plan for South Oxfordshire. The scheme’s impacts have been considered and opportunities to promote active travel form an integral part of the overall strategy.**

Green Belt

- 3.16 Chapter 13 of the Framework is concerned with protecting the Green Belt. Paragraph 152 explains that construction of new buildings in the Green Belt is inappropriate, and that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. It continues that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. Paragraph 153 states that “very special circumstances” will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. Paragraphs 154 and 155 confirm that there are some limited exceptions where buildings are not considered inappropriate, including “c) *local transport infrastructure which can demonstrate a requirement for a Green Belt location*”.

- 5.19 **CEG believes that the HIF Scheme can be considered as local transport infrastructure, which is not inappropriate development in the Green Belt. The same position which has now been adopted by Bernard Greep (the applicant's planning witness). However, it is also acknowledged that parts of the HIF Scheme have the potential to impact on openness.**
- 5.20 **If the HIF Scheme is considered to be inappropriate development, CEG suggests that there are multiple public benefits to it which when taken together amount to very special circumstances sufficient to outweigh the harm by way of inappropriateness and any other harm. This includes the delivery of substantial numbers (around 14,000) of new homes, new employment space, and the continued important work of the UKAEA, all of which will be enabled by the HIF Scheme.**

6.0 THE DEVELOPMENT PLAN AND OTHER MATERIAL CONSIDERATIONS

- 6.1 As referenced above, Section 70(2) of the Town & Country Planning Act 1990 requires that in dealing with an application for planning permission an authority shall have regard to the provisions of the development plan, in so far as it is material to the application under consideration, and Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

The Development Plan

- 6.2 In this instance, the Development Plan comprises:
- The South Oxfordshire Local Plan (SOLP) 2035;
 - The Vale of White Horse Local Plan (VoWHLP) 2031; and
 - The Oxfordshire Minerals and Waste Core Strategy (OMWCS).
- 6.3 The SOLP was adopted in December 2020 and sets out development in South Oxfordshire up to 2035. The plan identifies locations for housing, retail, and employment land as well as the infrastructure required to support this growth.
- 6.4 The VoWHLP is divided into two parts: (a) the Local Plan 2031 Part 1 which was adopted in December 2016, and (b) the Local Plan 2031 Part 2 which was adopted in October 2019. The Local Plan Part 1 sets out the spatial strategy and strategic policies for VoWH to deliver sustainable development. The Local Plan Part 2 complements the Part 1 Local Plan and sets out policies and locations for housing for the VoWH proportion of Oxford's unmet housing needs up to 2031.
- 6.5 The OMWCS was adopted in September 2017 by OCC which is the determining authority for this application. The OMWCS sets out the vision, objectives, spatial

planning strategies and policies for meeting development requirements for the supply of mineral and the management of waste in Oxfordshire up to 2031.

Other Material considerations

- 6.6 Oxfordshire County Council (OCC) adopted its Local Transport and Connectivity Plan, in July 2022. The LTCP was adopted pursuant to the Transport Act 2000.
- 6.7 The LTCP outlines OCC's vision to deliver a net-zero transport and travel system that enables the county to thrive while protecting the environment and making Oxfordshire a better place to live for all residents.
- 6.8 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.
- 6.9 Against this backdrop of sustainable growth in the emerging Joint Plan, Culham Campus, and the land adjacent to it (Culham Science Village) are proposed to be retained as development allocations, and land for the HIF Schemes continues to be safeguarded for its delivery. The drafted polices 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
- 6.10 The important policies in so far as this inquiry is concerned are set out hereunder, grouped into relevant 'themes' for ease of reference. CEG has focussed on those policies which are most critical to its interests and its case at this inquiry.

Principle of Development

SOLP:

- Policy STRAT1: The Overall Strategy
- Policy STRAT3: Didcot Garden Town
- Policy STRAT8: Culham Science Centre
- Policy STRAT9: Land Adjacent to Culham Science Centre

VoWHLP

- Core Policy 1: Presumption in Favour of Sustainable Development
- Core Policy 7: Providing Supporting Infrastructure and Services
- Core Policy 15: Spatial Strategy for South East Vale Sub-Area
- Core Policy 16: Didcot A Power Station

6.11 The principle for the HIF Scheme is also set out in policies TRANS1b, and TRANS3 of the SOLP and Core Policies of 17 and 18 of the VoWHLP and these are considered in greater detail in the ‘transport’ section below.

6.12 The HIF Scheme is embedded in policies of both the SOLP and the VoWHLP. The need for the Scheme and its early testing came as a result of the spatial options which emerged through Local Plan drafting at both Councils. The HIF roads are part of the infrastructure package to support the delivery of development across “Science Vale,” and in particular at Didcot Garden Town (both of which straddle the district boundary between South Oxfordshire and the Vale of White Horse), and north to Culham.

6.13 Considering first the principle need, and policy support, for the HIF Scheme as set out in the SOLP: Policy STRAT 1 sets out that:

Proposals for development in South Oxfordshire... should be consistent with the overall strategy of:

i) focusing major new development in Science Vale including sustainable growth at Didcot Garden Town and Culham...

6.14 Policy STRAT3 goes on to explain that:

1. Within the Didcot Garden Town masterplan area the Local Plan will:

i) promote Didcot as the gateway to Science Vale;

ii) identify Didcot as the focus of sustainable major new development for Science Vale;

...

vi) assist in having policies supporting the acquisition of significant funding investment and safeguarding land to implement infrastructure schemes;

...

viii) require infrastructure to unlock development in Didcot Town Centre, Didcot and the wider area;

...

3. Significant infrastructure improvements are committed to under Policy TRANS1b Supporting Strategic Transport Investment. Infrastructure will need to be in place to enable sites allocated in the Local Plan in and around Didcot to be delivered.

6.15 Policies STRAT8 and STRAT9 allocate significant amounts of new development at “Culham Science Centre” and the land adjacent to the west. The two allocated site areas are approximately 77ha and 217 ha respectively and combined the policies seek to deliver a net increase in employment land of at least 7.3 ha, and 3,500 new homes and associated services and facilities. To enable this significant and innovate new

growth, in a highly sustainable location (which represents the clearest example of the colocation of homes and jobs in the Local Plans, and includes a railway station), there is a need for new road infrastructure.

- 6.16 The infrastructure requirements are explained most clearly in Policy STRAT9, including at criterion vi) as follows:

...all necessary infrastructure, referring to the Infrastructure Delivery Plan, which is likely to include:

a. new junctions onto the A415 and significant contributions towards the Clifton Hampden Bypass, the Didcot to Culham River Crossing, and upgrading the A4074/B4015 junction at Golden Balls...

- 6.17 In the VoWHLP Core Policy 1 sets out the principles enshrined in law and national policy that:

Planning applications that accord with this Local Plan 2031 (and where relevant, with any subsequent Development Plan Documents or Neighbourhood Plans) will be approved, unless material considerations indicate otherwise.

- 6.18 CEG is of the view that this clearly demonstrates that the HIF Scheme accords with the development plan and should therefore be approved.

- 6.19 Core Policy 7 explains the Vale of White Horse Council's approach to supporting infrastructure delivery. The policy explains that:

All new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal. Infrastructure requirements will be delivered directly by the developer and/or through an appropriate financial contribution prior to, or in conjunction with, new development. Where appropriate, developers will be expected to collaborate on the provision of infrastructure which is needed to serve more than one site. In ensuring the timely delivery of infrastructure requirements, development proposals must demonstrate that full regard has been paid to the Infrastructure Delivery Plan and all other relevant policies of this plan.

- 6.20 The policy text is clearly contemplating a situation where partnership working, and collaboration will be necessary to deliver some important infrastructure. The HIF Scheme is one such situation where the Councils have worked together to successfully secure Government funding for infrastructure, some of the cost of which will be 'clawed back' via developer contributions.

- 6.21 Core Policy 15 identifies a housing requirement for the plan period, in the "South East Vale Sub-Area," of some 12,450 new dwellings. This growth includes housing development "adjoining Didcot" and employment development at Harwell Campus

Milton Park, and other locations in Scienc Vale. To support this growth new infrastructure will be required, to ensure generally acceptable development but also to ensure that development is “*in accordance with the Development Plan taken as a whole*”.

- 6.22 Finally, Core Policy 16 is the site policy for the (former) Didcot A Power Station. This is the southern end of the HIF Scheme, and the site policy includes the following text:

The proposed route of the new Science Bridge and A4130 re-routing is safeguarded. Planning permission will not be granted for development that would prejudice the construction or effective operation of this highway infrastructure...

Transport

SOLP:

- Policy TRANS1b: Supporting Strategic Transport Investment
- Policy TRANS3: Safeguarding of Land for Strategic Transport Schemes

VoWHLP:

- Core Policy 17: Delivery of Strategic Highway Improvements within the South-East Vale Sub-Area;
- Core Policy 18: Safeguarding of Land for Transport Schemes in the South East Vale Sub-Area.
- Core Policy 18a: Safeguarding of Land for Strategic Highway Improvements within the South-East Vale Sub-Area

OCC:

- LTCP - Policy 36.

- 6.23 As the SOLP was emerging through evidence collection, plan drafting, and consultation part of the process was an Evaluation of Transport Impacts (ETI) this document concluded that to support growth, several strategic transport improvements would be required. Transport improvements and investments form a significant part of the SOLP, and the schemes are a package of measures to work together to improve the whole network.

- 6.24 Schemes should not be seen in isolation when considering the range of transport types necessary to achieve a properly operational network (although each scheme might need its own development consent). Policy TRANS1b includes 9 sub criteria, and this illustrates the amount of strategic work put into assessing the whole transport network for the district, and that new roads are not the only improvements and investments sought (it should also be notes that there is another policy: Policy TRANS2: Promoting Sustainable Transport and Accessibility which also forms part of the network strategy for the district). However, when considering the HIF Scheme, Policy TRANS1b states the following:

The Council will work with Oxfordshire County Council and others to:

- i) *deliver the transport infrastructure which improves movement in and around Didcot, including measures that help support delivery of the Didcot Garden Town;*
- ii) *support measures identified in the Local Transport Plan for the district including within the relevant area strategies;*
- ...
- vii) *support the development and delivery of a new Thames River crossing between Culham and Didcot Garden Town, the A4130 widening and road safety improvements from the A34 Milton Interchange to Didcot, a Science Bridge over the A4130 and railway into the former Didcot A power station site and the Clifton Hampden Bypass;*

6.25 Criterion vii) of Policy TRANS1b is referring specifically to the HIF Scheme. There is a subsequent policy which in combination with TRANS1b seeks to support the delivery of strategic roads improvements, and that is Policy TRANS3: Safeguarding of Land for Strategic Transport Schemes. TRANS3 (and its accompanying maps in Appendix 5 of the SOLP) 'safeguards' land for the delivery of the HIF Scheme, at:

- *Clifton Hampden bypass*
- *A new Thames River crossing between Culham and Didcot Garden Town*
- *Science Bridge, Didcot*

6.26 Policy TRANS3 also explains that:

- 2. *New development in these areas should be carefully designed having regard to matters such as building layout, noise insulation, landscaping, the historic environment and means of access.*
- ...
- 5. *As the options for the schemes progress, the impact of the schemes will be subject to thorough assessment. This will include full environmental and archaeological assessments working in association with the relevant statutory bodies. Where schemes are located in areas of Flood Zones 2 and 3, a flood risk sequential test and the exception test should be undertaken as part of the appraisal process.*

6.27 The VoWHLP also went through the same policy development and assessment process as the SOLP, and it had its own supporting ETI.

6.28 The VoWHLP spatial strategy is divided into sub-areas, but overall has a similar level of strategic and interconnected transport planning as the SOLP. The policy framework is very similar in both plans. VoWHLP Core Policy 17 sets out the transport strategy for the South East Sub-Area and explains that:

In order to deliver the growth in the South East Vale Sub-Area and the wider Science Vale area, the Science Vale Area Strategy has identified highways infrastructure to mitigate [its] impact...

... the infrastructure identified within the Science Vale Area Strategy:

- access to the strategic road network, for example, improvements to the A34 at the Milton and Chilton junctions*

...

- Science Bridge and A4130 re-routing through the Didcot A site • A4130 dualling between Milton Interchange and Science Bridge*
- a new strategic road connection between the A415 east of Abingdon-on-Thames and the A4130 north of Didcot, including a new crossing of the River Thames*

- 6.29 Core Policy 18 then explains that land shown on the policies map is 'safeguarded' for the delivery of the specific roads schemes listed in Core Policy 17.
- 6.30 Core Policy 18a of the VoWHL Part 2, is an update to Core Policy 18. As work continued in support of the SOLP, which was behind the VoWHL in its drafting programme, it became clear that the specific location for some of the road schemes and the Thames River Crossing between Culham and Didcot, in particular, would need to be in a slightly different location. Hence the need for a new policy to 'safeguard' a new area of land.
- 6.31 Turing to the OCC Local Transport and Connectivity Plan (LTCP). The LTCP covers the time period to 2050.
- 6.32 Under the section heading 'Network, parking and congestion management' (page 97 of the LTCP), the role of OCC as the highway and streetworks authority is set out, noting that it is responsible for a range of management functions including working to manage congestion and highways infrastructure.
- 6.33 Alongside managing the existing network, OCC is also responsible for overseeing the delivery of new highways infrastructure. Whilst OCC prioritise reducing car use and the need to travel, the LTCP recognises that in some cases new roads, or widening roads and junctions may be necessary, to ensure a reliable and effective transport network.
- 6.34 Page 105 of the LTCP goes on to note that:

"...there are examples where road schemes may be required and will deliver improvements. This includes where access is needed to new developments or where the existing road is unsafe.

...We will always require careful modelling for major schemes to ensure that the likely effects on the wider network are fully understood."

6.35 The pre-text to Policy 36 of the LTCP notes that:

“Ensuring that Oxfordshire’s transport network remains reliable and effective is key to supporting the local economy and everyday journeys. Some road capacity enhancements may be required to enable this.

Where appropriate, road capacity schemes will help to tackle congestion and pollution providing benefits to health and everyday journeys. It will also support the economy and ensure the county remains an attractive place to work and live.”

6.36 It is the case therefore that although the focus of the LTCP is to deliver a net-zero Oxfordshire transport and travel system by discouraging individual private vehicle journeys and making walking, cycling, public and shared transport the natural first choice, there is clear recognition that there remain instances where it is necessary to increase the capacity of the road network, to help tackle congestion and support economic growth.

Green Belt

SOLP:

- Policy STRAT6: Green Belt

VoWHLP

- Core Policy 13: The Oxford Green Belt

6.37 Both Policy STRAT6 and Core Policy 13 reflect the Framework at Chapter 13 and seek to protect the Green Belt from harmful development only allowing forms of development that would be deemed not inappropriate, unless very special circumstances indicate otherwise.

6.38 Both policies also set out how the Councils have assessed Green Belt in their area and changed boundaries to accommodate strategic growth. CEG notes specifically, that SOLP Policy STRAT6 refers to other policies STRAT8 and STRAT9 as referred to above. Moreover, CEG notes that the Local Plan seeks to safeguard land to enable the HIF scheme to come forward through Polciy TRANS3 and its accompanying plan, so logically the HIF scheme must be viewed by the SODC as being justifiable development, in the Green Belt, in policy terms.

7.0 CEG’S CASE ON THE INSPECTOR’S IDENTIFIED MAIN ISSUES

7.1 CEG’s position is set out below, referring to the Inspector’s relevant ‘Main Issues’ as appropriate.

The need for and benefits of the scheme (Main issue 1)

- 7.2 The need for the Scheme first emerged through the Local Plan drafting exercises of SODC and the Vale of White Horse District Council around 10 years ago. The Scheme is intended to relieve development pressures, which are a legacy of the previous Core Strategy in South Oxfordshire. The Scheme is also required to support new growth as allocated in the extant South Oxfordshire Local Plan 2034 and the Vale of White Local Plan 2031 - in all, the delivery of around 14,000 homes, and several thousand jobs.
- 7.3 Culham Science Village is at the northern end of the Scheme and is a very clear example of sustainable strategic planning which promotes the co-location of homes and jobs, with the additional benefit of an existing railway station. Culham Science Village will be delivered adjacent to the Culham Campus which is a well-established, world-leading research establishment. The Scheme will unlock substantial residential and employment development at Culham Science Village. The Scheme is very clearly the best solution for the transport constraints in the area local to Culham Science Village. Although other transport options may allow a degree of future development at Culham Science Village, they are all inferior alternatives, in terms of delivery timescales and supporting the delivery of much needed new homes in a timely fashion.
- 7.4 The HIF Scheme represents Local Plan led infrastructure delivery in a timely fashion alongside growth.
- 7.5 In summary on this issue, the development which the HIF Scheme can 'unlock' will support the 14,000 homes as referred to above, but more than simply new homes in sustainable locations:
- it will support the UK's Fusion Energy Strategy at Culham Campus and over £1 billion funding;
 - it will support the delivery of a significant quantum and diverse range of jobs, particularly at the Culham No.1 Site, adjacent to Culham Campus;
 - it will support the 'Culham Smart Community' initiative, which benefits from Culham Campus's location on the Oxfordshire Knowledge Spine and the symbiotic relationship between housing and jobs along that spine.
 - it will enable sustainable patterns of movement and active travel;
 - it will support the regeneration of brownfield sites, such as those in the centre of Didcot and at the Culham No.1 site;
 - it will support the delivery of innovative, and sustainable new development, and the realisation of 15-minute neighbourhoods; and
 - it will support modern methods of volume construction.

Transport planning (Main issues 2, 3 and 4)

- 7.6 The local road network in the vicinity of the Culham Campus is heavily constrained, with a number of local junctions, including those within Clifton Hampden, operating well in excess of their operational capacity at peak times, leading to extensive queuing and protracted journey times.

- 7.7 The extent of existing constraints is such that they pose a significant barrier to the development Culham Science Village, post the No.1 Site development.
- 7.8 The Scheme is intended to provide additional network capacity along a broadly north south axis between the A34 at Milton Interchange and B4015 north of Clifton Hampden, which is itself to the northeast of the Campus.
- 7.9 In so doing, the Scheme will deliver relief to those junctions which immediately affect the Culham Science Village, namely those within Clifton Hampden and Culham, as well as providing a further crossing of the Thames so as to remove the need to use the two existing river crossings at Culham and Clifton Hampden.
- 7.10 The Scheme is not, however, simply about providing additional network capacity to support more car journeys; rather it presents an opportunity to materially enhance public transport provision and provide more direct pedestrian and cycle routes between Didcot, the strategic housing allocations in and around Didcot, Culham Science Village and Culham Campus.
- 7.11 The Scheme will afford the opportunity for new intra-urban bus routes to serve the Culham Science Village, and the adjacent Campus from Didcot to the south, Oxford to the north and Abingdon to the west. It will also afford greater opportunity for foot and cycle trips to be made.
- 7.12 The Scheme is fundamental to the full realisation of the STRAT9 site, which will see the delivery of some 3,500 new homes, directly co-located with Culham Campus, affording opportunity for modal shift and trip suppression which arises from the critical mass of mixed-use development and co-location of homes and jobs.
- 7.13 The Scheme meets the relevant policy tests and aligns with the County Council's Local Transport and Connectivity Plan which although seeks to reduce the overall number of car trips on Oxfordshire's roads, recognises that in some instances, new road infrastructure is necessary where access to new development is needed. In this regard, the new development is that identified in the adopted Development Plans and the extensive traffic modelling undertaken by the Applicant demonstrates that the Scheme is required to accommodate the planned level of growth and that alternatives were either ineffective, too expensive or difficult to deliver.
- 7.14 In summary on this issue, CEG's transport constraints are a good example of the issues which the Scheme is intended to address and that the Scheme represents the best way to overcome those constraints.
- 7.15 Moreover, the approach that OCC as the applicant has taken is supported by OCC Local Transport Plan, and the following polices of the Development Plan and an additional material consideration:

SOLP:

- Policy TRANS1b: Supporting Strategic Transport Investment
- Policy TRANS3: Safeguarding of Land for Strategic Transport Schemes

VoWHLP:

- Core Policy 17: Delivery of Strategic Highway Improvements within the South-East Vale Sub-Area;
- Core Policy 18: Safeguarding of Land for Transport Schemes in the South East Vale Sub-Area.
- Core Policy 18a: Safeguarding of Land for Strategic Highway Improvements within the South-East Vale Sub-Area

OCC:

- LTCP - Policy 36.

Planning policy (Main issues 13 and 14)

7.16 The Scheme is a plan led and strategic solution to a known constraint. It is explicitly supported by the following policies of the development plan (as explained above):

SOLP:

- Policy STRAT1: The Overall Strategy
- Policy STRAT3: Didcot Garden Town
- Policy STRAT8: Culham Science Centre
- Policy STRAT9: Land Adjacent to Culham Science Centre
- Policy TRANS1b: Supporting Strategic Transport Investment
- Policy TRANS3: Safeguarding of Land for Strategic Transport Schemes

VoWHLP

- Core Policy 1: Presumption in Favour of Sustainable Development
- Core Policy 7: Providing Supporting Infrastructure and Services
- Core Policy 15: Spatial Strategy for South East Vale Sub-Area
- Core Policy 16: Didcot A Power Station
- Core Policy 17: Delivery of Strategic Highway Improvements within the South-East Vale Sub-Area;
- Core Policy 18: Safeguarding of Land for Transport Schemes in the South East Vale Sub-Area.
- Core Policy 18a: Safeguarding of Land for Strategic Highway Improvements within the South-East Vale Sub-Area

7.17 The HIF roads will support the delivery of a range of strategic growth allocations in the Local Plan, in particular the substantial growth at Culham Science Village.

7.18 Culham Science Village, along with the Culham Campus, were released from the Oxford Green Belt and are allocated under Policies STRAT8 & STRAT9 for significant growth in the extant South Oxfordshire Local Plan. The two allocations also form a key part of two regional economic growth strategies: “Science Vale” and the “Knowledge Spine” and Culham Science Village will support housing opportunities for employees at the Culham Campus which are currently not available to them.

7.19 CEG is of the firm view (reflecting the view of OCC’s Planning witness) that the HIF Scheme can be considered as local transport infrastructure, which is not inappropriate development in the Green Belt, therefore its development is acceptable in Green Belt terms.

- 7.20 If the HIF Scheme is considered to be inappropriate development, CEG suggests that there are multiple public benefits to it which when taken together amount to very special circumstances sufficient to outweigh the harm by way of inappropriateness and any other harm. This includes the delivery of substantial numbers (around 14,000) of new homes, new employment space, and the continued important work of the UKAEA, all of which will be enabled by the HIF Scheme.
- 7.21 Returning to the supporting text to Policy STRAT9 refers directly to:
- “The delivery infrastructure to be forward funded by the Government’s ‘Housing and Infrastructure Fund’ and other existing funding...”*
- 7.22 The land for the road scheme is also ‘safeguarded’ through South Oxfordshire Local Plan Policy TRANS3.
- 7.23 CEG worked closely with South Oxfordshire and the County Council, in its role as highway authority, to secure the Policy STRAT9 allocation. The South Oxfordshire Local Plan Inspector specifically noted the sustainability of development at Culham Science Village and the adjacent Campus in his report.
- 7.24 Crucially, the Inspector also concluded that the accompanying infrastructure was necessary to help facilitate that sustainable growth.
- 7.25 It should be remembered that the delivery of HIF road scheme is designed to improve active and sustainable travel; it is not a road scheme simply to support more car journeys - the intention is that improved bus services, rail services and cycle and pedestrian connections will be provided alongside the road construction programme.
- 7.26 The supporting text to Policy STRAT8 states that:
- “The delivery of the following infrastructure is expected to be complete in 2024, as it is to be forward funded by the Government’s ‘Housing and Infrastructure Fund’ and other existing funding:*
- *the Didcot to Culham River Crossing; and*
 - *the Clifton Hampden Bypass.”*
- 7.27 Policy STRAT9 is a key component in the overall strategy for the District. See Policy STRAT1 of the Local Plan which specifically identifies development in the Science Vale, including at Culham as being a focus of major new development.
- 7.28 The land for the road scheme is also ‘safeguarded’ through Local Plan Policy TRANS3: Safeguarding of Land for Strategic Transport Schemes.
- 7.29 CEG worked closely with SODC and OCC, in its role as highway authority, in promoting the Policy STRAT 9 allocation. The Inspector appointed to examine the then emerging Local Plan commented in his report (at his paragraph 121) that accompanying infrastructure was necessary to help facilitate growth at Culham Science Village (the housing allocation for 3,500 new homes and associated services and facilities - Policy STRAT9: Land adjacent to Culham Science Centre):

'Policy STRAT9 [Land Adjacent to Culham Science Centre] requires contributions towards a new crossing of the River Thames between Culham and Didcot and a bypass of Clifton Hampden (as clarified by MM12) and they must be delivered prior to any significant development at Culham. The intention is that the transport schemes will be delivered by 2024. The site is particularly well located in respect of the planned Didcot to Culham River Crossing and the Clifton Hampden Bypass, which are not only road links but also include pedestrian and cycle links and will help to facilitate new bus services, and there are also other opportunities for sustainable transport modes; in the interests of creating a sustainable development, MM12 requires high quality walking and cycling facilities and infrastructure to support public transport within the site.'

- 7.30 The delivery of the Scheme is designed to improve active and sustainable travel; it is not a road scheme simply to support more car journeys - the intention is that improved bus services, rail services and cycle and pedestrian connections will be provided alongside the road construction programme as part of a wider package of S106 measures linked to the proposed growth in housing.

8.0 SUMMARY AND CONCLUSIONS

- 8.1 In conclusion, CEG's position on the issues identified by the Secretary of State is that the Scheme:

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

- 8.2 CEG's position on the additional issues identified by the Inspector (so far as relevant to its interest in Culham Science Village) is that:

- (1) OCC's traffic modelling is robust; OCC has had adequate regard to wider traffic impacts; and the Scheme is consistent with the LTCP;
- (2) the design for the Science Bridge is suitable; and
- (3) there are no reasonable alternatives which should be pursued instead of the Scheme.

- 8.3 Overall, CEG's position is that the Scheme is supported by the development plan and national planning policy, the harms are limited, and the need, benefits and other matters in support of the grant of planning permission are substantial. Accordingly, the Scheme is in accordance with the development plan, read as a whole, and the other material considerations support the conclusion that planning permission should be

granted. It follows that the Secretary of State should grant planning permission for the Scheme without delay.