

**Corridor between the A34 Milton Interchange and the B4015 north of  
Clifton Hampden.**

**NEIGHBOURING PARISH COUNCILS - JOINT COMMITTEE (NPC-JC)**

**SUMMARY PROOF OF EVIDENCE ON GREEN BELT**

**ALAN JAMES BSc MA MLI (RETIRED)**

1. My name is Alan James. I have a BSc Honours in Geography (University College London), an MA in Landscape Architecture (University of Sheffield), and am a retired chartered Member of the Landscape Institute (MLI). I have worked as a landscape architect since 1973, and from 1996 also worked as a consultant on sustainable transport. I have been an expert witness on both landscape and transport matters in over 20 public inquiries since 1996, including several major road schemes. I have worked on behalf of the NPC-JC since November 2021, shortly after the submission of the HIF1 planning application.
2. The HIF1 application was rejected by Oxfordshire CC (OCC) Planning and Resources committee (PRC) in July 2023 but was called in by the Secretary of State a week later. The PRC reviewed its decision of July 2023 at a meeting in September 2023, and in effect withdrew its objection to HIF1 on green belt grounds. It is unclear why the decision was reverse, given that the officer report to the September meeting was copied directly from the report to the July meeting, and no new evidence or argument was presented. OCC LPA seek to present the PRC's position as neutral for inquiry purposes, but this should not alter the fact that the July 2023 decision was **made**, even if OCC could no longer **enact** it.
3. The central argument in this proof is that under the terms of NPPF section 13, in particular paragraphs 152-155 (December 2023 version) ***the section of HIF1 north of the Thames is inappropriate development in the Green Belt and very special circumstances to override its inappropriateness do not exist.***
4. OCC LPA officers agree that the scheme constitutes inappropriate development in the green belt. OCC Highways, as Applicants for planning permission for HIF1 (OCC-A), also agreed for over two years, until 17 January 2024 when they changed their mind and attempted to argue the opposite.
5. OCC-A's argument relies entirely on a selectively chosen statement from NPPF paragraph 155, that local transport infrastructure which can demonstrate a requirement for a green belt location might not be inappropriate development. This not only pre-empts the question before the inquiry of whether HIF1 can demonstrate a requirement for a green belt location: it also ducks the rest of NPPF 155 which has criteria of preserving openness and not conflicting with green belt purposes. OCC-A's consultants for the HIF1 planning application (AECOM) went into this in great

detail and concluded unequivocally that HIF1 failed to maintain openness and conflicted with some purposes of including land in the green belt.

6. As a result of OCC-A's shift in position, they are now in disagreement with OCC LPA.
7. Both sections of Oxfordshire County Council claim that there are 'very special circumstances' that outweigh inappropriate development in the green belt. Without HIF1 it is said that there is a threat to future development of Culham Science Centre and there would be gridlock on the local road network. The second of these arguments is pure 'predict and provide', whereas OCC has moved, through the Local Transport Connectivity Plan (LTCP), towards 'decide and provide' and traffic reduction. This involves a wide range of possible transport strategies to head off gridlock, rather than assuming that new road capacity is the only solution when over several decades new capacity has been shown not to work.
8. It is said future development at Culham Science Centre/ Campus might be prevented, but the LPA SoC can say no more than that this is 'likely'. The UKAEA supports HIF1 (it has no reason not to) but any claims that HIF1 is necessary for future development are questionable, and in conflict with both its own Transport Assessment and with its Framework Masterplan. The TA concludes that without HIF1 the only short-term problem would be the site entrance itself, and that longer term forecasts of congestion 'hypothetical'. Unproven future scenarios do not add up very special circumstances to outweigh the undoubted harm to the green belt. The Framework Masterplan has a core objective to pursue a 'modern mobility strategy' in support of climate change targets (and the LTCP), and has modal shift targets that suggest it means business, which is incompatible with support for massive new road infrastructure on its doorstep.
9. A combination of a concerted rail-led multi-modal strategy to reduce demand for travel by car, assists UKAEA in its objectives for clean growth and a modern mobility strategy, and furthers the Council's LTCP. Along with possible but much more targeted highway capacity interventions, this has every prospect of working rather better than a blockbuster road scheme that opens the floodgates to cross-Thames traffic.
10. It is therefore very difficult to sustain a case that the harm HIF1 causes to the green belt as inappropriate development is outweighed by very special circumstances.

### **Additional documents**

The following documents are submitted with the proof of evidence, should they not be amongst the core documents to the inquiry. If any further documents referenced in the proof need to be provided I shall do so.

LTP3 Update: section 17 Science Vale Area Strategy, OCC May 2014

Culham Science Centre Addendum Transport Assessment by BSP consulting, 21 November 2021

Culham Science Centre Framework Masterplan, UKAEA July 2022

PPG 13 2001 (the 1994 version is said to be not available online, but the 2001 version reiterates the 1994 objectives, see opening summary paragraph and para 4: I may be able to find a hard copy of the 1994 version if required)

Alan James

January 2024