

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

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

PROOF OF EVIDENCE OF
STEVEN J SENSECALL DIP. T.P. MRTPI
ON BEHALF OF
THE UNITED KINGDOM ATOMIC ENERGY AUTHORITY

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 Southwest. 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 Science and Technology Facilities Council (STFC), Commercial Estates Group, 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 have been the retained planning consultant for the United Kingdom Atomic Energy Authority for more than 20 years, securing numerous planning consents, promoting the growth of its sites through Local Plans, and overseeing the development of masterplans for its sites in Oxfordshire.
- 1.5 I secured several consents for development at Culham Campus (previously known as Culham Science Centre) when it was in the Green Belt by demonstrating "*very special circumstances*," and through the latest iteration of the South Oxfordshire Local Plan, I worked closely with the District council to demonstrate that there were "*Exceptional Circumstances*" to justify the removal of the Campus from the Green Belt.
- 1.6 I acted for UKAEA in promoting the case for the removal of Culham Campus from the Green Belt and worked closely with South Oxfordshire's Local Plans Team in formulating Local Plan Policy STRAT8, which identifies Culham Campus as a strategic employment site in the adopted South Oxfordshire Local Plan 2011 – 2035. I represented UKAEA at the Local Plan Examination in Public (EIP).
- 1.7 In addition, I am currently working closely with South Oxfordshire Council's Planning Team and Oxfordshire County Council in its role as Highway Authority in drafting a Local Development Order (LDO) for Culham Campus to facilitate the delivery of the strategic growth envisaged in the Local Plan.
- 1.8 I also represent CEG who are the promoter of the land comprising adopted South Oxfordshire Local Plan Policy STRAT8: 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. Again, I represented CEG at the Local Plan EIP and worked closely with South Oxfordshire in formulating the policy and its supporting text.

- 1.9 Policies STRAT8 and STRAT9 relate respectively to the largest employment and housing allocations in the South Oxfordshire Local Plan and are both dependent on the delivery of the HIF Scheme. Without HIF, the jobs and much needed housing that these policies are intended to deliver will not materialise. This will completely undermine South Oxfordshire's strategy for growth and its vision for the district as a whole, as set out in the Local Plan, and will have a materially harmful effect on the economic wellbeing of South Oxfordshire, the County of Oxfordshire and UK PLC.
- 1.10 My CV is attached at **Appendix A**.

Statement of Truth

- 1.11 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

- 1.12 I appear at this Inquiry on behalf of The United Kingdom Atomic Energy Authority ('**the UKAEA**'), which is a Rule 6(6) party in this case. This Proof of Evidence ("**PoE**") has been prepared in accordance with the Town and Country Planning (Inquiries Procedure) (England) Rules 2000/1624.
- 1.13 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.'

- 1.14 Oxfordshire County Council ("**OCC**") is promoting the HIF Scheme. Pursuant to Regulation 3 of the Town and Country Planning General Regulations, OCC applied to itself for planning permission for the HIF Scheme. The application for planning permission for the HIF 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 HIF Scheme.

1.15 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.

1.16 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.

1.17 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.”

1.18 I now understand 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

1.19 I am therefore not expecting OCC as the Planning Authority to submit any further evidence, or to ‘defend’ its reasons for refusal at the inquiry.

1.20 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.

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

¹ See most recent Technical Note

- (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.

The Inspector's Main Issues

1.22 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 HIF 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
- 1.23 I have structured my evidence around the matters on which the Secretary of State wishes to be informed but in addressing those matters, and where it is relevant to the UKAEA's case, I will also cross refer to the Inspector's expanded main issues.
- 1.24 To assist the Inquiry, I will present the strategic case for the HIF roads scheme as it is necessary to support growth and investment at Culham. I will also provide my understanding of the processes and assessments – some of which I was involved in – where issues 4, 10 and 11 are concerned.
- 1.25 This proof of evidence should be read in conjunction with those of:
- (a) Prof. Sir Ian Champman, Chief Executive Officer of the UK Atomic Energy Authority, and
 - (b) Mr Tim Foxall, Transport Consultant and Managing Director, Glanville Consultants

Matters Agreed with OCC in its Role as the Applicant

- 1.26 A Statement of Common Ground ("**SoCG**") is in the process of being agreed with OCC in its role as the applicant. The SoCG will provide a full description of the Site and surrounding area, the relevant planning history of the Site and a summary of the Proposed Development. The SoCG also lists the planning policies and other documents that are relevant to consideration of this application.

2.0 THE CASE FOR UKAEA

- 2.1 The UKAEA supports the HIF Scheme and submits that planning permission should be granted.
- 2.2 The HIF 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 HIF Scheme on the development of Culham Campus will be to support the delivery of significant new employment development, and internationally important research and innovation. Culham Campus is the headquarters of the UKAEA. It is one of the foremost examples of how the HIF Scheme will deliver significant benefits for both the District and the UK.

3.0 THE UKAEA

3.1 Prof. Sir Ian Chapman sets out in his evidence the purpose and function of the UKAEA, but in short, it is an executive non-departmental public body, sponsored by the Department for Energy Security and Net Zero.

3.2 The UKAEA leads on research into fusion energy and related technologies. UKAEA's mission is to lead the delivery of sustainable fusion energy, to position the UK as a leader in sustainable nuclear energy and to maximise the scientific and economic benefit of this research.

4.0 CULHAM CAMPUS

4.1 Culham Campus is situated approximately 2.75 miles to the east of Abingdon, 4.5 miles north of Didcot and 5.5 miles south of Oxford.

4.2 Culham Campus is owned and run by the UKAEA.

4.3 Culham Campus occupies land formerly used as a naval airfield. In 1959, the UKAEA sought a site for a new laboratory for plasma physics and nuclear fusion research. The site needed to be within easy reach of the UKAEA's existing facilities at Harwell and Aldermaston, and in close proximity to Oxford University. The old naval airfield at Culham came nearest to meeting those requirements and on 29 January 1960, the UKAEA secured planning permission from OCC for the development of the site as a research establishment with access (OCC reference M.1015/59).

4.4 The laboratory, which covers some 80 hectares, was conceived, planned and built as a whole, and remains largely as it was when construction was completed in the mid-1960s. The original complex of buildings extended to approximately 59,000m².

4.5 Culham Campus combines world-class, publicly funded research into fusion power; commercial technology organisations and Culham Innovation Centre, to create a powerhouse of high technology innovation and enterprise in South Oxfordshire.

4.6 Culham Campus is an established part of the southern Oxfordshire cluster of education, science and technology, now known as Science Vale, and has established a broad high technology business base. The UKAEA is a partner in Science Vale and as such, is committed to working together with the other partners, including the

Oxfordshire authorities and Local Enterprise Partnership, to help to promote and develop the Science Vale area as an internationally recognised location for enterprise and innovation in science and technology.

- 4.7 The Culham Campus forms a key part of Science Vale and the Oxfordshire Knowledge Spine and is one of the largest employment centres in the County. Culham Campus currently supports over 3,000 jobs. It also has policy support for significant further growth under Policy STRAT8 of the South Oxfordshire Local Plan 2035 (**“the Local Plan”**), which sits alongside planned housing growth on the allocated ‘Land Adjacent to Culham Science Centre’ Strategic Housing Site (Policy STRAT 9 of the Local Plan).
- 4.8 The UKAEA is committed to further develop Culham Campus, in line with the ambition set in the Culham Science Centre Framework Masterplan (January 2022). The Framework Masterplan can be found at **Appendix 1 to Prof. Sir Ian Chapman’s Proof of Evidence**.

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 application.

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 **I will show in this proof of evidence that the HIF Scheme is “sustainable development” consistent with the meaning of that phrase in the Framework. I will show also that it conforms with the Development Plan and that accordingly it should be approved without further delay.**

Building a Strong and Competitive Economy

5.7 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. The UK Government's Powering Up Britain identifies that the UK is recognised as a global leader in the most promising fusion energy technologies.

5.8 **The UKAEA is a cornerstone of the Government's Fusion Strategy and the work undertaken at Culham Campus is vital to the future of clean growth. I will show in this proof of evidence that the HIF Scheme is vitally important to support the continued growth of an industry in which the UK is a global leader, and critical to the economy of the UK, and its future innovation and diversification.**

5.9 I note also 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..."

5.10 **I will show in this proof that the relevant development plan for the area contains policies precisely to address infrastructure barriers which could stymie economic growth and investment. The HIF Scheme is central to the delivery of these policies and thus is entirely in accordance with the strategic objectives of the development plan.**

Promoting Sustainable Transport

5.11 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."*

5.12 **Drawing on the evidence of Mr Foxall and in support the significant amount of work which the applicant has undertaken, I will demonstrate how the HIF Scheme is the result of evidenced based work which emerged through strategic**

local planning for South Oxfordshire. The HIF Scheme's impacts have been considered and opportunities to promote active travel form an integral part of the overall strategy.

Design

- 5.13 Paragraph 131 acknowledges that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 5.14 Paragraph 135 is also relevant to the consideration of this application stating that planning policies and decisions should ensure that development:
- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
 - d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
 - f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users⁴⁹; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*
- 5.15 **I am confident that the design of the HIF Scheme is appropriate, but the details of the design are outside of the scope of the UKAEA's case, except (1) where directly related to Culham Campus and (2) to note that if there are any residual harms identified, the benefits which are detailed in this evidence are manifold and substantial and capable of outweighing those harms.**

Green Belt

- 5.16 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 goes on to confirm 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*”.
- 5.17 **My starting point for considering the impact of the HIF roads scheme on the Green Belt is to note that it can be considered as local transport infrastructure which requires a Green Belt location for the purposes of paragraph 155(c) of the Framework. Further, it appears to me that the HIF Scheme is capable of complying with the openness and purposes provisos at the start of paragraph 155 of the Framework, such that it is not inappropriate development in the Green Belt.**
- 5.18 **If the HIF Scheme is considered to be inappropriate development, I suggest 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 national and international importance of the work of the UKAEA at Culham Campus which will be enabled by the HIF Scheme.**

Meeting the Challenge of Climate Change and Flooding

- 5.19 The Framework acknowledges that we face significant challenges in the form of climate change and flooding. At paragraph 157 it is explained that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions; minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- 5.20 Turning to flood risk the Framework seeks to direct development away from areas at the greatest risk from flooding, however, at paragraph 169 it states:

If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will

depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.

- 5.21 At Annex 3 in the Framework, some development can be acceptable in the areas of highest flood risk (so long as they also pass the exception test if in Flood Zone 3), including:

- *Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.*

- 5.22 The exception test for development in areas of high flood risk is explain at Paragraph 170 of the Framework:

The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that:

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and*
- b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.*

- 5.23 **The UKAEA, and specifically work at Culham Campus, is delivering the transition to a low carbon future. This work will be severely hampered if the HIF Scheme is not delivered. The HIF Scheme is essential transport infrastructure, which is necessary to realise residential and economic growth, and to support the aspirations of the UKAEA, and by extension the UK Government.**

Landscape and AONB

- 5.24 Chapter 15 in the Framework sets out policies and guidance for “Conserving and enhancing the natural environment”. Paragraph 180 explains that planning policies and decisions should contribute to and enhance the natural and local environment by:

“a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

- c) *maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- e) *preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate”*

5.25 **I acknowledge that the HIF Scheme passes through open countryside. However, none of it is designated for its landscape value. The route of the HIF Scheme was also the subject of a Strategic Assessment at the plan-making stage, which necessarily considered reasonable alternatives, and which resulted in the proposal to safeguard that being confirmed in the adopted Local Plan.²**

5.26 **It is likely that parts of the HIF Scheme will be visible from the AONB, but I will demonstrate that the public benefits of the HIF Scheme are such as to outweigh any residual landscape impact. This I intend to do by reference to the HIF Scheme’s social, economic, and environmental benefits.**

Heritage

5.27 Chapter 16 is concerned with “conserving and enhancing the historic environment”. It makes clear that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be) and that “*any harm to, or loss of, the significance of a designated heritage asset*”, including “*from development within its setting*” requires “*clear and convincing justification*”. It goes on to explain that where a development proposal will lead to “less than substantial harm” to the significance of a designated heritage asset, “*this harm should be weighed against the public benefits of the proposal...*”³

5.28 **The applicant has shown that limited, or no harm will be caused to the heritage significance and setting of local heritage assets. This has been done to the satisfaction of the County Archaeologist and Historic England. The Case Officer’s conclusion in the Committee Report was that if there was any harm to**

² SODC Local Plan Policy TRANS3

³ NPPF, paragraph 208

a heritage asset it was less than substantial and that it was outweighed by the benefits of the proposed development.

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.

- 6.6 The important policies in so far as this inquiry is concerned are set out hereunder, grouped into relevant 'themes' for ease of reference. I have focussed on those policies which are most critical to the interests of the UKAEA 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

6.7 The HIF Scheme is embedded in policies of both the SOLP and the VoWHLP. The need for the HIF Scheme and its early testing came about as a result of the spatial options which emerged through those Local Plans. In short, the HIF Scheme is an essential element of infrastructure package that supports 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 at Culham.

6.8 Considering first the principle need, and the policy support for the HIF Scheme as set out in the SOLP, Policy STRAT 1 states 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...

6.9 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;

2. *...*

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.*

- 6.10 Culham Campus, which is covered by Policy STRAT8, extends in all to some 77 hectares; while the land west of the Campus the Policy STRAT9 land) covers some 217 hectares. The Campus already supports 59,000m² of built development and there is a further 10 hectares of commercial development on the Culham No.1 Site element of the land covered by Policy STRAT9. Policies STRAT8 and STRAT9 also promote a minimum of a further 7.5 hectares of employment-generating development spread across the two sites.
- 6.11 In addition, Policy STRAT9 seeks to deliver “approximately 3,500 new homes” (with approximately 2,100 in the Plan period) with associated services and facilities.
- 6.12 This planned and much needed market and affordable housing and employment-generating development is uniquely sustainable by virtue of its ability to collocate housing and jobs at scale and its proximity to a railway station that can be upgraded to provide quick and easy access to Oxford and to the east-west main line via Didcot.
- 6.13 The purpose of the HIF funding is to facilitate the construction of the HIF Scheme, which in turn provides the road infrastructure that is necessary to ‘kick start’/serve the committed STRAT8 and STRAT9 development, which though S106 payments will enable some of that funding to be ‘clawed back’, and in facilitating investment in associated non-car modes of travel, including walking and cycling infrastructure, increased capacity for buses and further investment in rail travel.
- 6.14 Without the HIF Scheme this strategy will unravel, and the much-needed market and affordable housing with collocated jobs cannot/will not be delivered.
- 6.15 The necessary infrastructure is explained most clearly in Policy STRAT9, including at criterion vi) which states that:
- ...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...*
- 6.16 Core Policy 1 in the VoWHLP sets out the principles enshrined in law and national policy, which are 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.*
- 6.17 The evidence I present here demonstrates that the HIF Scheme accords with the development plan and should therefore be approved.

- 6.18 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.

- 6.19 The policy text is clearly contemplating a situation where partnership working, and collaboration will be necessary to deliver essential 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.

- 6.20 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*".

- 6.21 Finally, Core Policy 16 is the site policy for the (former) Didcot A Power Station. This is the southern end of the HIF roads 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.

- 6.22 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 HIF Schemes are a package of measures to work together to improve the whole network.
- 6.23 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 noted 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 roads scheme, Policy TRANS1b states that:

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;*

- 6.24 Criterion vii) of Policy TRANS1b is referring specifically to the HIF roads 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 roads scheme, at:

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

- *Science Bridge, Didcot*

6.25 Policy TRANS3 also explains that:

4. *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 HIF Schemes progress, the impact of the HIF 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.*

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

6.27 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.*

6.28 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.

6.29 Core Policy 18a of the VoWHLP Part 2, is an update to Core Policy 18. As work continued in support of the SOLP, which was behind the VoWHLP 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.

- 6.30 Mr Foxall explains in his proof of evidence how the HIF Scheme is compliant with the OCC LTCP.

Green Belt

SOLP:

- Policy STRAT6: Green Belt

VoWHLP

- Core Policy 13: The Oxford Green Belt

- 6.31 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.

- 6.32 Both policies also set out how the Councils have assessed Green Belt in their area and changed boundaries to accommodate strategic growth. I note specifically that SOLP Policy STRAT6 refers to other policies, including Policy STRAT8 and Policy STRAT9.

Sustainable Development and Climate Change

SOLP:

- Policy DES7: Efficient use of Resources
- Policy DES8: Promoting Sustainable Design
- Policy DES9: Renewable and Low Carbon Energy
- Policy DES10: Carbon Reduction

VoWHLP:

- Core Policy 40: Sustainable Design and Construction
- Core Policy 43: Natural Resources.

- 6.33 The Local Plans for both South Oxfordshire and the Vale of White Horse were written prior to both authorities declaring climate emergencies and are products of a time before the (important) raised awareness of climate change and carbon management. The emerging Joint Local Plan for both authorities is seeking to introduce new strategic policies regarding climate and carbon management.

- 6.34 I do not comment on the potential materials, and sustainable design of the HIF Scheme as it is beyond the scope of the UKAEA's interests. I note, however, that the Sustainability Appraisal which supported the SOLP concluded (when considering the infrastructure policies) that:

Obj. 5. To reduce harm to the environment by seeking to minimise pollution of all kinds especially water, air, soil and noise pollution.

Policies INF1, TRANS1a and b, TRANS3 and TRANS6 set out various requirements for infrastructure provision, strategic transport schemes and rail provision which would directly affect this SA objective through creating new or improving the infrastructure of the District which could result in the creation of water, air, soil and noise pollution during construction and operation and therefore have minor negative effects on this objective. However, policy TRANS2 promotes sustainable transport and accessibility, possibly reducing the negative effect these policies would have on this SA objective. The policies themselves could potentially reduce the creation of air and noise pollution through encouraging a modal shift towards more sustainable modes of transport such as walking, cycling and public transport. Policies EP1, ENV12 and ENV13 require developments to be implemented in ways that heavily reduce the amount of pollution they create. A minor negative effect is therefore identified.

Obj. 10. To seek to address the causes and effects of climate change

Policies INF1, TRANS1a and b, TRANS3 and TRANS6 sets out the requirements for infrastructure provision, strategic transport schemes and rail provision, which would directly affect this SA objective through creating new or improving the infrastructure of the District, which could result in the creation of greenhouse gases during construction of the transport and infrastructure developments. The policies themselves could potentially reduce the creation of greenhouse gases through encouraging a modal shift towards walking, cycling and public transport. Policy DES8 requires new developments to consider and reduce its contribution to climate change. A minor positive effect is identified for policy TRANS6 due to its provision of greener and sustainable transport methods and a minor negative effect is identified for the remaining policies due to the scale of the impacts these policies would create.

- 6.35 Whilst the introduction of new infrastructure has the potential to increase greenhouse gas emissions, the ‘package’ of policies is designed to manage and mitigate any negative effects. In my view, it is clear from the OCC’s appraisals that the delivery of the HIF Scheme is consistent with the pathway to net zero, both at a local and national level. It would be erroneous in my view to assume that the pathway to net zero excludes the delivery of any strategic transport schemes (including any new roads). The HIF Scheme is an example of how such schemes can promote sustainable transport to facilitate the move to net zero.
- 6.36 Moreover, I refer to the central tenet of the UKAEA’s case at this Inquiry, which is that the delivery of the HIF Scheme will facilitate the continued growth of Culham Campus and its internationally vital work towards fusion power, which will herald abundant energy production with no carbon emissions. There is no more climate aware and carbon reducing aspiration than realising fusion power.

Landscape

SOLP:

- Policy ENV1: Landscape and Countryside

VoWHLP:

- Core Policy 44: Landscape

- 6.37 Policy ENV1 and Core Policy 44 both reflect the Framework, and the aim to protect valued landscape. Both policies recognise the inherent ‘hierarchy’ of protection, that designated areas, such as AONB, are afforded the greatest level protection whilst acknowledging that there is a value in protecting the countryside for its own sake.
- 6.38 The detailed landscape effects of the HIF roads scheme are beyond the scope of the UKAEA’s case; however, I note that the Sustainability Appraisal which supported the SOLP concluded (when considering infrastructure-related policies):

Obj. 8. To improve efficiency in land use and to conserve and enhance the district’s open spaces and countryside in particular, those areas designated for their landscape importance, minerals, biodiversity, and soil quality.

Policies INF1, TRANS1a and b, TRANS2, TRANS3 and TRANS6 set out various requirements for infrastructure provision, strategic transport schemes and rail provision, which would directly affect this SA objective through creating new or improving the infrastructure of the District which could result in the loss of land within the countryside and effects on local landscape. Policies DES1, ENV1, ENV2 and ENV3 would require the developments to be well designed, ensuring they blend in with the local landscape. A minor negative effect is therefore identified.

- 6.39 I note that the assessment in the SA refers to the loss of countryside and local landscape effects, but that the ‘package’ of policies is designed to manage and mitigate any negative effects. Moreover, I set out in this proof of evidence that the benefits of the HIF Scheme are manifold and substantial and would be sufficient to outweigh most levels of landscape harm to non-designated landscape areas, and certainly the “minor negative” identified in the SA.

Historic Environment

SOLP:

Policy ENV6: Historic Environment

VoWHLP:

- Core Policy 39: The Historic Environment;

- 6.40 Policy ENV6 and Core Policy 39 both reflect the Framework, and the aim of conserving and enhancing the historic environment. They also recognise the inherent ‘hierarchy’ of protection (with designated assets being afforded the greatest level protection) whilst acknowledging that there is a value in protecting all assets of heritage interest depending upon their identified significance and accepting that some loss can be acceptable when balanced with public benefits.
- 6.41 The detailed heritage effects of the HIF Scheme are beyond the scope of the UKAEA’s case; however, I note that the Sustainability Appraisal which supported the SOLP concluded (when considering the Infrastructure policies) that:

9. To conserve and enhance the district’s historic environment including archaeological resources and to ensure that new development is of a high quality design and reinforces local distinctiveness.

Policies INF1, TRANS1a and b, TRANS2, TRANS3 and TRANS6 sets out various requirements for infrastructure provision, strategic transport schemes and rail provision, which would directly affect this SA objective through creating new or improving the infrastructure of the District which could have an effect upon the historic environment and archaeological assets. Policies DES1 and ENV1 would require developments to be well designed, reducing effects on the wider area, including heritage features. Furthermore, policies ENV9 and ENV10 affords protection to the District’s conservation areas and archaeological assets respectively. The potential for a minor negative effect is identified as there could be effects on the setting of heritage assets.

- 6.42 I note that the assessment in the SA refers to the effects on the setting of heritage assets, but that the ‘package’ of policies is designed to manage and mitigate any negative effects. Moreover, I set out in this proof of evidence that the benefits of the HIF roads scheme are manifold and substantial and would be sufficient to outweigh most levels of less than substantial harm to heritage assets, and certainly the “minor negative” identified in the SA.

Design

SOLP:

- Policy DES1: Delivering High Quality Development
- Policy DES2: Enhancing Local Character

VoWHLP:

- Core Policy 37: Design and Local Distinctiveness; and

- 6.43 From a strategic perspective, and within the scope of the UKAEA’s case, design is not a matter of particular concern and there are other development management type policies of detail about which I do not comment here. However, the principle of quality design is set out in both the SOLP and VoWHLP, which reflects the importance placed on design in the Framework.

- 6.44 I turn, again, to the SA of the SOLP which considered how design would be managed through the package of policies in the SOLP, and this concluded:

9. To conserve and enhance the district's historic environment including archaeological resources and to ensure that new development is of a high quality design and reinforces local distinctiveness.

Policies INF1, TRANS1a and b, TRANS2, TRANS3 and TRANS6 sets out various requirements for infrastructure provision, strategic transport schemes and rail provision, which would directly affect this SA objective through creating new or improving the infrastructure of the District which could have an effect upon the historic environment and archaeological assets. Policies DES1 and ENV1 would require developments to be well designed, reducing effects on the wider area, including heritage features. Furthermore, policies ENV9 and ENV10 affords protection to the District's conservation areas and archaeological assets respectively. The potential for a minor negative effect is identified as there could be effects on the setting of heritage assets.

- 6.45 From a strategic perspective, I am confident that there is a policy framework at the local level that can manage the appropriate design of the HIF roads scheme, and that the HIF Scheme itself can meet the requirements of these policies.

Biodiversity

SOLP

- Policy ENV2: Biodiversity Designated Sites, Priority Habitats and Species;

VoWHL

- Core Policy 45: Green Infrastructure; and
- Core Policy 46: Conservation and Improvement of Biodiversity.

- 6.46 This is another policy area which is beyond the strict remit of the UKAEA case, but I record here, for completeness, my understanding of the strategic approach to managing biodiversity in the context of the HIF Scheme.

- 6.47 The SOLP SA, concluded that the infrastructure policies would have the following effects:

6. To conserve and enhance biodiversity

Policies INF1, TRANS1a and b, TRANS3 and TRANS6 set out various requirements for infrastructure provision, strategic transport schemes and rail provision, which would directly affect this SA objective through creating new or improving the infrastructure of the District which could result in the loss of biodiversity. However, policy TRANS2 does require for infrastructure and transport developments to be sustainable, possibly reducing the negative effect these policies have on this SA objective. Policies ENV2 and ENV3 relating to

biodiversity would require new developments to be well designed and avoid a net loss of biodiversity, or where this can't be avoided, contributions given to biodiversity projects. A minor negative effect is therefore identified.

- 6.48 From a strategic perspective, again, I am confident that there is a policy framework at the local level that can manage the biodiversity effect of the HIF roads scheme. I note that the adopted policy approach is to avoid a net loss of biodiversity, or where this cannot be avoided, contributions should be made towards biodiversity projects. This is something that the HIF Scheme can deliver.

Flood Risk

SOLP:

- Policy EP4: Flood Risk

VoWHL

- Core Policy: 42 Flood Risk.

- 6.49 Flood risk is approached in both Local Plans as it is in the Framework, by seeking to direct development to areas of the lowest risk, and where this is not possible, and exception test will be required.

- 6.50 Looking again at the SA from the SOLP, this concluded that:

11. To reduce the risk of, and damage from, flooding.

Policies INF1, TRANS1a and b, TRANS2, TRANS3 and TRANS6 sets out the requirements for infrastructure provision, strategic transport schemes and rail provision, which would directly affect this SA objective through creating new or improving the infrastructure of the District, which could result in an increased risk of surface water flooding. However, policy TRANS2 does require for infrastructure and transport developments to be sustainable, possibly reducing the negative effect these policies have on this SA objective. Policy DES8 requires new developments to be well designed and resilient to the anticipated effects of climate change. No effects are therefore identified, and so overall impacts are neutral.

- 6.51 I note that the SA concluded that there could be an increased risk of surface water flood risk, in particular, as a result of the policies for infrastructure.
- 6.52 I note also that the HIF Scheme includes a river crossing that must cross an area of flood risk. However, the HIF Scheme is essential transport infrastructure and is considered in a specific way in flood management terms. Standing advice explains that more flood risk vulnerable uses and essential infrastructure should only be permitted in flood zone 3 if the Exception Test is passed. Essential infrastructure permitted in flood zone 3 should be designed and constructed to remain operational and safe for users in times of flood.

- 6.53 I have set out the criteria for the exception test earlier in this proof of evidence, but in short, the need for and benefits of the HIF roads scheme, as I set out in this proof of evidence, are sufficient to deliver wider sustainability benefits to the community that outweigh the flood risk.

Minerals and Waste

SOLP:

Policy EP5: Minerals Safeguarding Areas.

OMWCS:

- Policy M8 Safeguarding Mineral Resources
- Policy M9 Safeguarding Mineral Resources
- Policy W11 Safeguarding Waste Management Sites

- 6.54 I note that parts of the HIF Scheme pass through areas which are ‘safeguarded’ for minerals extraction. This matter is outside of the scope of the UKAEA case, but I note that the above listed policies allow for extraction as a prelude to development, extraction should not occur if it would not be viable and/or a judgement is made to the effect that the need for and benefit of an alternative use is more appropriate when the development plan is read as a whole.

- 6.55 The policies framework for the HIF Scheme as tested through the SOLP SA concluded that:

8. To improve efficiency in land use and to conserve and enhance the district’s open spaces and countryside in particular, those areas designated for their landscape importance, minerals, biodiversity, and soil quality.

Policies INF1, TRANS1a and b, TRANS2, TRANS3 and TRANS6 set out various requirements for infrastructure provision, strategic transport schemes and rail provision, which would directly affect this SA objective through creating new or improving the infrastructure of the District which could result in the loss of land within the countryside and effects on local landscape. Policies DES1, ENV1, ENV2 and ENV3 would require the developments to be well designed, ensuring they blend in with the local landscape. A minor negative effect is therefore identified.

- 6.56 I note that although the objective specifically mentions minerals, there is no significant conclusion drawn, and I therefore assume that any effect was deemed to be *de minimis*.
- 6.57 Moreover, I note that the manifold and substantial benefits of the HIF Scheme would outweigh the need to extract minerals in this limited area.

Other Material considerations

- 6.58 OCC adopted its Local Transport and Connectivity Plan, in July 2022. The LTCP was adopted pursuant to the Transport Act 2000.
- 6.59 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.
- 6.60 Under this heading I would also refer to the Department of transports *Draft National Policy for National Networks* (March 2023), paragraph 5.37 in which reads as follows:
- 5.37 Operational greenhouse gas emissions from some types of national network infrastructure cannot be totally avoided. Given the range of non-planning policies aimed at decarbonising the transport system, government has determined that a net increase in operational greenhouse gas emissions is not, of itself, reason to prohibit the consenting of national network projects or to impose more restrictions on them in the planning policy framework. Any carbon assessment will include an assessment of operational greenhouse gas emissions, but the policies set out in chapter 2 of the NPS, apply to these emissions. Operational emissions will be addressed in a managed, economy-wide manner, to ensure consistency with carbon budgets, net zero and our international climate commitments. Therefore, approval of schemes with residual carbon emissions is allowable and can be consistent with meeting carbon budgets, net zero and the UK's Nationally Determined Contribution.*
- 6.61 Put more succinctly, the message I take from this statement, and with which I concur, is that the path to net zero does not and cannot mean an end to road building.

7.0 THE UKAEA'S CASE ON THE INSPECTOR'S IDENTIFIED MAIN ISSUES

- 7.1 In this section I deal with specifically with the identified 'main issues' as they relate to the UKAEA's case.

The Need for and Benefits of the HIF Scheme

- 7.2 The need for the HIF Scheme first emerged through the Local Plan drafting exercises undertaken by SODC and the Vale of White Horse District Council around 10 years ago. The HIF Scheme is intended to relieve development pressures, which are a legacy of the previous Core Strategy in South Oxfordshire. The HIF 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 Campus is at the northern end of the HIF Scheme. The HIF Scheme will unlock further employment development at Culham Campus. The HIF Scheme is very clearly the best solution for the transport constraints on future development at Culham

Campus. Although other transport options may allow a degree of future development at Culham Campus, they are all considerably inferior alternatives.

- 7.4 In his evidence, Professor Sir Ian Chapman explains the role of UKAEA, its Vision and its plans for growth. My take on that Vision and those plans for growth is summarised below.
- 7.5 Further development at Culham Campus will support the UK's Fusion Energy Strategy at Culham Campus. Towards Fusion Energy: the UK Government's fusion strategy⁴ was launched in October 2021, and updated in October 2023, placing Culham Campus (and its growth) at the centre of the UK's Fusion and sustainability ambitions. This was supported by the injection of c £184m of funding via the Fusion Foundations Programme (FFP) to transform the Culham Campus into a global hub for fusion innovation. The government has shown its commitment to realising the Fusion strategy by announcing a new £650m Fusion Futures programme in addition to the £700m already allocated to UK fusion energy programmes between 2022 and 2025. Fusion energy is a key element of the UK's Green Energy strategy⁵ (which was launched by the Prime Minister from the Culham Campus, exemplifying its importance) and in October 2023 when it announced an additional £650M for fusion development⁶ UKAEA has been working to establish a Framework Masterplan for the site and to deliver the first phase of this by 31st March 2025. This includes the delivery of a new Main Gate building and infrastructure works directly linked to the HIF Scheme.
- 7.6 The consequential risk of the HIF Scheme not being delivered is that the UKAEA's planned infrastructure works will become much harder to deliver. The UKAEA could also miss out on opportunities to improve Active Travel (improved cycle routes for example) and to support the modal shift towards a more sustainable "campus" that the HIF Scheme is due to enable.
- 7.7 In addition, the failure to deliver the HIF Scheme would undermine the vision in the Local Plan for the development of Culham Campus. The Local Plan recognises Culham Campus's status as '*the leading UK centre for fusion research technology and [its] international importance*' as well as '*the key role of the Culham Campus site and supports and encourages its redevelopment*'.⁷ However, the Local Plan also recognises that Culham Campus cannot expand without the necessary infrastructure, including road infrastructure.⁸ The HIF Scheme is a specific response to that need (amongst others) and a failure to deliver the HIF Scheme will be directly harmful to the objectives of the Local Plan.
- 7.8 The UKAEA's Framework Masterplan clearly articulates the vision for redevelopment of Culham Campus. It is ambitious and, with the right supporting road infrastructure,

⁴ [Towards fusion energy: the UK government's fusion strategy \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/towards-fusion-energy-the-uk-government-s-fusion-strategy)

⁵ [Powering Up Britain - The Net Zero Growth Plan \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/publications/powering-up-britain-the-net-zero-growth-plan)

⁶ [Government announces up to £650 million for UK alternatives to Euratom R&T - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/government-announces-up-to-650-million-for-uk-alternatives-to-euratom-r-t)

⁷ See paragraphs 3.67 and 3.68.

⁸ *ibid*

will deliver significant growth on site both in terms of building density and job creation. Consistent with the Government's Plan for Growth and its support for the science and technology sector, and in particular Fusion-related research and development, these high-quality jobs - bringing together those working directly in the private Fusion sector and those in its wider supply chain – will support the local economy as the transition to Net Zero continues.

7.9 In summary on this issue, my evidence taken together with that of Professor Sir Ian Chapman, demonstrates that:

- (1) the development needs of UKAEA at Culham Campus are a good example of the strategic need for the HIF Scheme within the District(s); and
- (2) the benefits that will arise from unlocking future development at Culham Campus (and the adjacent planned strategic housing site) will have a significant effect at both a local (District) scale and at a national scale, given the critical importance of UKAEA's work to the UK as a whole.

Transport Planning

7.10 Tim Foxall explains in his evidence that 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.

7.11 The extent of existing constraints is such that they pose a significant barrier to the continued development of the Campus – in recent years I have been directly involved in a number of planning applications at Culham where we have had to off-set development trip generation for more urgent schemes or schemes with limited budget windows against extant consents so as to ensure a net-neutral impact on the local road network is achieved, or where the UKAEA has had to agree to what would in normal circumstances be an unreasonably high contribution to bus services and works related to other non-car modes again because that was the only way to mitigate the impact in the absence of an approved HIF Scheme, and in an environment where there are fundamental constraints on network capacity.

7.12 The HIF 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.

7.13 In so doing, the HIF Scheme will deliver relief to those junctions which immediately affect the Campus, 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.

7.14 The HIF 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 and on land west of Culham Campus and Culham Campus itself.

- 7.15 This will materially benefit the Culham Campus, which is currently constrained by the absence of direct routes south to Didcot and beyond. The HIF Scheme will afford the opportunity for new intra-urban bus routes to serve the 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.
- 7.16 The HIF Scheme is fundamental to the delivery of the adjacent STRAT9 site, which will see the delivery of some 3,500 new homes, directly collocated with the Campus, affording opportunity for modal shift and trip suppression which arises from the critical mass of mixed-use development and collocation of homes and jobs.
- 7.17 The HIF Scheme meets the relevant policy tests and aligns with the County Council's Local Transport and Connectivity Plan which, although it seeks to reduce the overall number of car trips on Oxfordshire's roads, also 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 HIF Scheme is required to accommodate the planned level of growth and that alternatives were either ineffective, too expensive or difficult to deliver.
- 7.18 In summary on this issue, Mr Foxall has demonstrated that the UKAEA's transport constraints are a good example of the issues which the HIF Scheme is intended to address and that the HIF Scheme represents the best way to overcome those constraints.
- 7.19 Moreover, the approach that OCC as the applicant has taken is supported by OCC Local Transport Plan 4, and the following policies of the Development Plan:

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

Environmental effects (including Climate change)

- 7.20 It is important to note that the UKAEA is at the forefront of unlimited and climate resilient energy creation. The fusion research programme truly is a world leader in managing the environmental effects of humankind.
- 7.21 As set out in Professor Sir Ian Chapman's evidence, not delivering the HIF Scheme will place in jeopardy UKAEA's mission to lead the delivery of sustainable fusion energy and the scientific and economic benefit. This has not only national but global significance which will be explained by the UKAEA in its evidence.
- 7.22 As set out above, Mr Foxall has also detailed how the delivery of the HIF Scheme will 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. This is of particular importance to the UKAEA and its active travel programme which will also be explained at the inquiry.
- 7.23 In summary on this topic, the collective evidence of the UKAEA has demonstrated that the delivery of the HIF Scheme will give rise to positive environmental effects of significant importance.

Planning policy

- 7.24 The HIF 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

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

- 7.25 The HIF roads will support the delivery of a range of strategic growth allocations in the Local Plan, in particular the substantial planned investment and growth at Culham Campus.
- 7.26 The Culham Campus is 'inset' from the Oxford Green Belt and is allocated under Policy STRAT8 for significant growth in the Local Plan. The Culham Campus also forms a

key part of two regional employment strategies: “Science Vale” and the “Knowledge Spine,” and is one of the largest employment centres in Oxfordshire. Culham Campus currently supports around 3,000 jobs.

7.27 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.”*

7.28 Policy STRAT8 is a key component in the overall strategy for the District. I would also refer to Policy STRAT1, which specifically identifies development in Science Vale, including at Culham, as being a focus of major new development.

7.29 The land for the road scheme is also ‘safeguarded’ through Local Plan Policy TRANS3: Safeguarding of Land for Strategic Transport Schemes.

7.30 UKAEA worked closely with SODC and OCC, in its role as highway authority, to secure the Policy STRAT 8 allocation. The Inspector appointed to examine the then emerging Local Plan commented in his report (at his paragraph 112) that:

‘[Culham Science Centre] is internationally important for research, and it is essential that change and growth can be accommodated in the future. The purpose of the allocation is to enable the site in its entirety to realise its full potential as a science campus where publicly funded science research and commercial technology growth can flourish.’

7.31 Crucially, the Inspector also concluded (again at his paragraph 121) that accompanying infrastructure was necessary to help facilitate growth at Culham Campus and the adjacent 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.’

- 7.32 The delivery of the HIF 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 My considered view on the issues identified by the Secretary of State is that the HIF Scheme:

- (1) will support significant – internationally important – economic growth and investment;
- (2) will support the complimentary delivery of new homes; and
- (3) is directly supported by – and in accordance with - the development plan.

- 8.2 On the additional issues identified by the Inspector (so far as relevant to its interest in the Culham Campus) my considered view is that:

- (1) OCC's traffic modelling is robust; OCC has had adequate regard to wider traffic impacts; and the HIF Scheme is consistent with the LTCP;
- (2) the HIF Scheme's impact on carbon is acceptable and the HIF Scheme will make a positive contribution to climate change;
- (4) the design for the Science Bridge is suitable; and
- (5) there are no reasonable alternatives which should be pursued instead of the HIF Scheme.

- 8.3 My overall conclusion is that:

- The HIF Scheme is a cornerstone of and fully in accordance with the Development Plan when read as a whole;
- The HIF Scheme is consistent with national planning policy;
- There is a clear and convincing economic case for the HIF Scheme at both a local and national level; and that
- The harms are limited and can, where it is necessary and appropriate to do so, being mitigated effectively.

- 8.4 Accordingly, my clear and considered view is that the planning balance in this case lies squarely with a decision to approve the called-in application as submitted and without delay.

APPENDIX 1: CV: STEVEN JOHN SENSECALL



Steven Sensecall BA (HONS), DIP, TP, MRTPI

Partner
Oxford

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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