

IN THE MATTER OF:

A CALLED IN APPLICATION FOR PLANNING PERMISSION FOR THE DUALLING
OF THE A4130 CARRIAGEWAY, CONSTRUCTION OF THE DIDCOT
SCIENCE BRIDGE, ROAD BRIDGE OVER THE APPLEFORD RAILWAY SIDINGS
AND ROAD BRIDGE OVER THE RIVER THAMES, AND ASSOCIATED WORKS

LAND BETWEEN A34 MILTON INTERCHANGE AND B4015 NORTH OF CLIFTON
HAMPDEN, OXFORDSHIRE

OPENING STATEMENT
ON BEHALF OF UKAEA

I. INTRODUCTION

1. The United Kingdom Atomic Energy Authority (“**the UKAEA**”) appears at this inquiry because the development of the UKAEA’s headquarters at the Culham Campus is one of the foremost examples of why the proposed development (“**the Scheme**”) is needed now.
2. The Culham Campus is at the centre of fusion development globally.¹ By permitting the Scheme now, the future development of the Culham Campus will be unlocked and substantial national benefits will be secured through the future growth of what is already a facility of national – as well as international – significance.²
3. The importance of this future development at Culham Campus is recognised in the Government’s Fusion Energy Strategy and has been confirmed very recently in a letter directly to this inquiry from the Secretary of State for Energy Security and Net Zero.³ The development plan also recognises that the Culham Campus ‘*is the leading UK centre for fusion research and technology and is of international importance*’; with commensurate policy support for its growth.⁴

¹ Professor Sir Ian Chapman’s Proof of Evidence (“**POE**”) at [1.4] on PDF p. 4.

² Ibid at [4.6] on PDF p. 8.

³ Core Document (“**CD**”) N18.

⁴ CD G1 at [3.67] on PDF p. 46.

4. If planning permission is not granted for the Scheme, the future development of the Culham Campus and the associated national benefits will be stifled and may be lost altogether.⁵ The Scheme is long overdue: it must be permitted now and delivered quickly. Any further delay would be intolerable, both for the UKAEA and for Oxfordshire.

II. ACCORDANCE WITH THE DEVELOPMENT PLAN – THE SECRETARY OF STATE’S THIRD ISSUE⁶

5. The proper starting point for the determination of this application is the development plan.⁷ At the commencement of this inquiry, three aspects of the development plan are of critical importance.⁸

Future development of the Science Vale & Culham Campus

6. First, support for the future development of the Science Vale – and the Culham Campus specifically – pervades the development plan.
7. The Science Vale is recognised as ‘*an international location for science and technology*’ which should ‘*continue to grow as a world- renowned science, research and innovation hub that attracts business, creates job opportunities and delivers housing growth*’.⁹ This ambition is embedded in the overarching vision and objectives of the development plan;¹⁰ and it is made real by the strategic policies in the development plan which make the Science Vale the focus for major new development, including specifically at Culham.¹¹
8. The growth of the Science Vale is not a one-dimensional objective focussed on never-ending swathes of employment land; rather, the development plan envisages

⁵ Mr Sensecall’s POE at [7.5] ff on PDF p. 33.

⁶ Given the statutory scheme it is logical to consider this issue first.

⁷ See s. 70(2) of the Town and Country Planning Act 1990 and s. 38(6) of the Planning and Compulsory Purchase Act 2004

⁸ The focus here is on the South Oxfordshire Local Plan, given Culham’s location. However, there is complete consistency with the Vale of White Horse Local Plan.

⁹ CD g1 at [2.29] on PDF p. 29 and [2.5] on DPF p. 13.

¹⁰ CD G1 at PDF pp. 13 – 14 – see in particular the desire for a ‘*prosperous place to live*’ in the vision to 2035 and objective 1.4 (growth of Science Vale).

¹¹ See, especially, Policy STRAT1 which specifically refers to the Science Vale and Culham – CD G1 on PDF p. 22.

sustainable growth within the Vale where housing and employment sites are co-located and interlinked.¹² Nowhere is this more apparent than at the Culham Campus.

9. The Culham Campus is inset from the Green Belt and entirely within strategic allocation STRAT8 in the South Oxfordshire Local Plan (“SOLP”).¹³ This allocation of some 77 hectares directly supports the redevelopment and intensification of the campus to deliver at least a net increase in employment land of 7.3 hectares – the second largest single employment allocation in the SOLP.¹⁴ Further and at the same time, the adjacent land – amounting to some 217 hectares – is allocated for c. 3,500 home by policy STRAT9 – the largest single housing allocation in the SOLP.¹⁵ There is no better example of strategic, sustainable, development within the Science Vale.

Support for the delivery of the Scheme

10. Secondly, there is clear and unequivocal support for the delivery of the Scheme. There is a raft of strategic policies which lend strong and unequivocal support to the delivery of the Scheme.¹⁶

Link to the delivery of other essential development

11. Thirdly, the development plan expressly acknowledges the link between the delivery of the Scheme and the delivery of other essential development, in particular housing, in the County. This applies specifically to the Culham Campus as well: the development plan recognises that it ‘cannot expand’ as planned ‘without necessary infrastructure, including the Didcot to Culham River Crossing and the Clifton Hampden Bypass’.¹⁷
12. It is, of course, no surprise that the County Council’s officers reached exactly the same conclusion when recommending the grant of planning permission for the Scheme.¹⁸ All of the technical material about the Scheme that they reviewed – and which is now before this inquiry – points clearly to an urgent need to deliver the Scheme in order to unlock essential development in the County, not least at the Culham Campus.

¹² See, for example, Objective 1.4 – CD G1 on PDF p. 15.

¹³ CD G1 at PDF p. 48.

¹⁴ See Policy EMP1 – CD G1 at PDF p. 128.

¹⁵ CD G1 at PDF p. 49.

¹⁶ See, for example, Policy TRANS1b and STRAT3 of the SOLP.

¹⁷ CD G1 at [3.68] on PDF p. 46.

¹⁸ CD F1 at [137] on PDF p. 53.

The inquiry today

13. None of these components of the development plan are seriously disputed by any party. Indeed, faced with the clear words of the development plan, some objectors appear to want to simply wish it away.¹⁹ Such an approach must be rejected outright. The straightforward and unambiguous position is that the development plan positively supports the delivery of the Scheme and sees it as a crucial linchpin in the delivery of its ambitions for the County.
14. Further, when considering these matters, it is important to have well in mind that all of these strategic policies and objectives were thoroughly tested at the recent local plan examinations and found sound, including in the face of many of the arguments that we will hear repeated at this inquiry. The Examining Inspectors expressly endorsed the delivery of homes and employment land within the Science Vale and the use of the Scheme to achieve that outcome, especially at the Culham Campus which they noted to be *'an exceptional centre of knowledge, employment and research which presents a rare opportunity for growth in an area restricted by the Green Belt'* and which was *'particularly well located in respect of the [Scheme]'*.²⁰ The alternatives proposed by objectors were rightly rejected as *'unrealistic'*.²¹
15. Accordingly, the UKAEA's position in this inquiry is that the Scheme accords with the development plan, read as a whole. The positive strategic support for the Scheme is clear cut and when assessed against the development management policies the impacts of the Scheme are acceptable.

III. CONSISTENCY WITH THE GOVERNMENT'S POLICIES FOR DELIVERING A SUFFICIENT SUPPLY OF HOMES - THE SECRETARY OF STATE'S FIRST ISSUE

16. The UKAEA's position is that the Scheme is an essential driver for the delivery of a sufficient supply of homes in the County. Indeed, the reliance on the Scheme to unlock future delivery, such as on land adjacent to the Culham Campus, is a matter that is expressly recognised in the development plan, as already described.

¹⁹ See Mr Tamplin's POE on behalf of POETS at [4.4] and [4.11] - [4.12].

²⁰ CD G18 at [111] on PDF p. 27 and [121] on PDF p. 29.

²¹ CD G18 at [81] on PDF p. 21.

IV. CONSISTENCY WITH THE GOVERNMENT'S POLICIES FOR BUILDING A STRONG, COMPETITIVE ECONOMY - THE SECRETARY OF STATE'S SECOND ISSUE

17. The UKAEA's position is that the Scheme is entirely in accordance with the Government's policies for building a strong competitive economy. The Scheme satisfies each and every paragraph in Chapter 6 of the NPPF.
18. The unlocking of future development at the Culham Campus exemplifies this consistency with the NPPF. For example, in respect of the overarching objective in paragraph 85:
- 18.1. The UKAEA and its associated cluster businesses can only invest, expand and adapt at the Culham Campus if the Scheme is delivered. The scheme is a necessary precondition to this economic development.
- 18.2. There is a clear national need for the UKAEA and its associated cluster businesses to grow. This need attracts significant weight. So too the Scheme which is the only realistic way to meet that need.
- 18.3. The Science Vale – of which the Culham Campus is a principal part – is an area of scientific innovation and strength. It should be allowed to grow and the Scheme is necessary to remove the barriers to this growth.
- 18.4. The work of the UKAEA at the Culham Campus is an area in which Britain is already a global leader. That position of strength can only be strengthened and protected for the long term through the growth of the Culham Campus, an objective which depends on the Scheme.
19. All of these matters are confirmed by the Secretary of State for Energy Security and Net Zero in her letter to the inquiry: Culham Campus *'is central to the UK's ambition to lead the world in the development of commercially viable fusion energy'*; the Government has identified the UKAEA as an important target for investment; that investment *'is designed to grow the capability of the UK fusion industry and make the UK the primary global hub for fusion innovation'*; in this regard the Culham Campus *'is key to our global advantage'*; and a *'central part of the UK's Fusion Strategy is to grow the Culham campus'*.²²

²² CD N18.

V. OTHER MATTERS

20. A number of additional matters have been identified as issues for consideration in the inquiry. The majority of these relate to various technical complaints about the County Council's transport modelling or allegations of technical planning harm arising from the Scheme. The UKAEA leaves these matters to the County Council in the first instance. However, there are two cross cutting matters which are also raised in objections to the UKAEA's case. None of these objections are robust.
21. First, a number of objectors refer to the possibility of alternatives – either to the Scheme generally or to the reliance of the UKAEA on the Scheme in the development of the Culham Campus. These arguments are flawed in multiple respects. The UKAEA has considered alternative approaches to transport for the campus and none are adequate. Further, outside of the process of environmental assessment, alternatives only require consideration in exceptional circumstances, but none of the objectors have sought to grapple with that test or to demonstrate such circumstances.²³ Finally and in any event, all of the alternatives proposed by objectors today are inchoate. Such vague and unevicenced suggestions – essentially wishful thinking – are not capable of being material considerations in the determination of this application.²⁴ These arguments should not be entertained further.
22. Secondly, a number of objectors contend that the delivery of the Scheme is inconsistent with the attainment of net zero, the decarbonisation of the transport network in the County and travel to the Culham Campus specifically. This is not correct. The Scheme is necessary to unlock further sustainable transport to the campus, in particular by foot, bus and bicycle. Further, the role of the Scheme in achieving decarbonisation is made explicit in the Local Transport and Connectivity Plan (“**the LTCP**”) which specifically lists the Scheme as a necessary measure to achieve its ambitious aims.²⁵ Objectors cannot laud the LTCP without considering it as a whole. Quite simply: building the Scheme now – including the new roads within it – is compatible with attaining net zero.

²³ See *R. (Mount Cook Land Ltd) v Westminster City Council* [2003] EWCA Civ 1346, [2017] P.T.S.R. 1166 per Auld LJ at [30].

²⁴ *Ibid*

²⁵ See CD G4 at PDF pp. 157 – 158.

23. It follows that the other considerations in this case do not support a departure from the development plan; to the contrary, they support the grant of planning permission for the Scheme.

VI. CONCLUSION

24. For the reasons above, as the UKAEA will explain in its evidence and submissions to the inquiry, planning permission should be granted for the Scheme in due course.

MATTHEW HENDERSON

**Landmark Chambers,
180 Fleet Street,
London EC4A 2HG.**

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