

**Draft South Oxfordshire Local Plan 2011 - 2034**  
**Proposed strategic allocations at Culham**  
**Planning Report**



**February 2019**

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## Introduction

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1. This report has been commissioned by Save Culham Green Belt, a committee of Culham Parish Council comprising residents of Culham parish whose remit is to interrogate South Oxfordshire District Council's Final Publication Version of the Draft Local Plan 2011 - 2034 dated January 2019.
2. Policy STRAT2 of the Draft Local Plan says that 22,775 new homes and 37.5 hectares of employment land need to be delivered over the plan period (2011 - 2034). 4,950 of these new homes are intended as South Oxfordshire's contribution towards Oxford City's unmet housing need (this has been increased from the previously agreed figure of 3,750). According to the Table 5C on page 86 of the Draft Local Plan, 15,726 of the total number of required new homes have either already been delivered within the plan period or are current commitments. That leaves 7,049 new homes that need to be delivered up to 2034. The Draft Local Plan, however, makes provision for 12,739 new homes up to 2034 (i.e. 5,690 more than is currently needed) as *"this provides additional flexibility to enable the management of our housing land supply trajectory going forwards and to respond to changing circumstances"* (paragraph 5.12 of the Draft Local Plan).
3. Policies STRAT8 and STRAT9 of the Draft Local Plan propose to remove 301 hectares of land at Culham from the Oxford Green Belt and to include the land as strategic allocations providing 3,500 dwellings and 7.3 hectares of new employment land.
4. This report looks into the following aspects of the Draft Local Plan and its evidence base in relation to the proposed strategic allocations at Culham:
  1. Green Belt
  2. Sustainability Appraisal
  3. Strategic site selection
  4. Landscape and visual impact
  5. Transport
  6. New Thames river crossing

5. Considering the evidence on these key issues, the firm conclusion is that the Draft Local Plan's proposed strategic allocations at Culham fail the tests of "soundness" as set out in paragraph 35 of the National Planning Policy Framework. In particular, the proposed strategic housing allocation at Culham is **not justified** when considered against the reasonable alternatives and is **not consistent with national policy** in relation to the need, as set out in the National Planning Policy Framework, to protect Green Belts from harmful development.

## Green Belt

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### Government policy

6. Paragraph 133 of the National Planning Policy Framework (NPPF) says that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts, therefore, are their openness and permanence. Land is included in Green Belts based on its importance in meeting the five purposes of the Green Belt as set out in paragraph 134 of the NPPF.

These are:

- a) to check the unrestricted sprawl of large built-up areas
  - b) to prevent neighbouring towns merging into one another
  - c) to assist in safeguarding the countryside from encroachment
  - d) to preserve the setting and special character of historic towns
  - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land
7. Although part of the importance of Green Belts is their permanence, the NPPF sets out a mechanism for reviewing Green Belt boundaries. Paragraphs 136 and 137 say:

*"Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.*

*"Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development."*

8. Paragraph 138 of the NPPF advocates a sequential approach to the development of land in the Green Belt. This requires that land outside the Green Belt should be considered for development ahead of land within the Green Belt, then urban areas inside the Green Belt boundary should be considered for development first, followed by towns and villages inset from the Green Belt and locations beyond the outer Green Belt boundary. The release of Green Belt land should only be a last resort after all of the above options have been exhausted.
9. Government policy on Green Belts, therefore, is very clear. Land within Green Belts needs to be protected from development to maintain their openness. Whilst Green Belt boundaries can be reviewed as part of the Local Plan preparation process, that should only be done if land is needed for development, "exceptional circumstances" exist to justify the removal of land from the Green Belt, and it can be demonstrated that all other reasonable options have been fully examined to meet housing needs.

## **Oxford Green Belt**

10. The Oxford Green Belt was approved by the Secretary of State for the Environment as an amendment to the County Development Plan in 1975. This set the outer boundaries, with an extensive inner area being left as interim Green Belt pending the adoption of local plans. The Central Oxfordshire Local Plan defined the boundaries of the Green Belt within South Oxfordshire in 1992.
11. Paragraph 3.45 of the subsequent South Oxfordshire Local Plan 2011 says:

*"The retention of the special historic character of Oxford is one of the fundamental objectives of planning policy in Oxfordshire. The special character of Oxford is comprised not only of the University buildings themselves and the views of the 'dreaming spires' from the surrounding hills, but also the wedges of open land which extend along the floodplains of the River Thames and Cherwell into the City, and the*

*general area of attractive countryside which surrounds the City and creates its wider setting. The scale of activity in this area is an important determinant of its character. Any significant increase in the level of activity will result in increased pressures for development which threaten the character and setting of the City."*

12. The essential purpose of the Oxford Green Belt in South Oxfordshire, therefore, continues to be to preserve the famous and unique setting of Oxford, including the river floodplains and surrounding countryside. The city remains intimately connected with its landscape setting, which is an essential and distinctive feature of its special character. In addition, the Oxford Green Belt is one of the narrowest Green Belts in the country at only four to six miles wide, so it is very sensitive to incremental erosion at its edges.

### **Green Belt Studies**

13. When it became known that Oxford City would not be able to meet all of its housing needs within its administrative boundary, all of the Oxfordshire Councils commissioned the preparation of the Oxford Green Belt Study (October 2015). Paragraph 1.5 of the Study says:

*"...the outputs of the study, alongside other assessments will assist local authorities in considering the extent to which some existing Green Belt land could be used to accommodate sustainable forms, patterns and types of new development."*

14. The Oxford Green Belt Study assesses the contribution that 13 large "Broad Areas" and 83 more specific "Green Belt Parcels" make towards meeting the five purposes of the Green Belt. This is intended to inform decisions about the potential release of Green Belt land to meet housing needs. The proposed strategic allocation at Culham is included within Broad Area 6, but is not included within any of the 83 smaller Green Belt Parcels. The Study, therefore, did not consider it was even a possibility that it may be appropriate to remove the land at Culham from the Green Belt.

15. The Oxford Green Belt Study says that Broad Area 6 as a whole scores "high" in two of the four relevant purposes of including land in the Green Belt, as follows:

- to assist in safeguarding the countryside from encroachment
- to preserve the setting and special character of historic towns

16. The Oxford Green Belt Study is not included in the Draft Local Plan's evidence base. However, the Local Green Belt Study for South Oxfordshire District Council (September 2015) is included in the evidence base. Paragraph 1.1 of that Study says:

*"The principal purpose of this Local Green Belt Study is to assess the extent to which the land within the Green Belt still meets the five purposes of the Green Belt as stated in paragraph 80 of the National Planning Policy Framework in the context of the current need to identify additional land for housing in the District to meet local and Oxford based demand."*

17. The proposed strategic housing allocation at Culham is included within wider land parcels 02 and 03. Table 5 confirms that both of these land parcels make an important contribution to three of the four relevant purposes of including land in the Green Belt, as follows:

- to assist in safeguarding the countryside from encroachment
- to preserve the setting and special character of historic towns
- to prevent neighbouring towns merging into one another

18. Page 64 of the Study suggests that Culham Science Centre is inset from the Green Belt as this developed area is considered to reflect few of the Green Belt's purposes. The following reference is made to the open land to the west of the railway line (i.e. the site of the proposed strategic housing allocation):

*"The field to the west of the Culham Science Centre beyond the railway line could provide a potential area for expansion. However the area's openness and degraded field boundaries means it is vulnerable to the perception of encroachment into open countryside and would require reinforcement planting. Expansion into this field would also result in a westwards expansion of built form towards Culham village. It will be important to avoid the perception of the settlements merging."*

19. Paragraph 14.5 of the Study recognises that any development potential of the land to the west of Culham Science Centre is constrained by the difficulty in finding a well defined new boundary to the Green Belt (as required by the NPPF) without taking a large swathe of open land. The Study says that further assessment of the suitability of the land to the west of Culham Science Centre needs to be carried out. This has now

been carried out in the form of the Green Belt Assessment of Strategic Sites (December 2018), which has been prepared by the same consultants who prepared The Oxford Green Belt Study in 2015.

20. The Green Belt Assessment of Strategic Sites (December 2018) assesses eight potential development sites in relation to the level of harm to the five purposes of including land in the Green Belt. Unsurprisingly, the Assessment finds that the harm to the purposes of the Green Belt arising from releasing the whole of the Culham site (301 hectares) or the whole of the proposed housing site (220 hectares) from the Green Belt would be "high". It says on page 70:

*"The intention is to create a new settlement, associated with Culham Science Centre, rather than to extend an area of existing inset development. Abingdon, to the west of the site, is the closest inset settlement, but is separated from it by Back Water and by the River Thames and its associated floodplain. Tree cover adds visual separation across the flat, valley floor landscape, and on the slope of the east-west ridge, therefore the site is much more associated with the surrounding countryside than with the town.*

*"Development would constitute encroachment on a sizeable area of undeveloped countryside, and whilst strong barriers and open space would remain to prevent the coalescence of towns, it would nonetheless represent a significant increase in the extent of urban development between Abingdon, Didcot and Berinsfield, particularly as perceived along the Abingdon Road between Abingdon and Berinsfield. Although boundary features are largely well defined, development would weaken the Green Belt to the south of the site between the A415 and the Thames, and to the north between the river and Abingdon. There would be some impact upon the historic setting of Oxford, as the River Thames which runs along the northern edge of the site is important to its setting, particularly for those approaching by boat or along the Thames path." [my emphasis]*

21. As the proposed strategic housing allocation at Culham would urbanise a large swathe of attractive open countryside, contribute towards the coalescence of Culham village and Culham Science Centre and, in the process, subsume the existing properties along Thame Lane and at Culham Station, the Assessment says there would be a high level of harm to the Green Belt purposes. On a larger scale, the proposal would also contribute



towards the coalescence of Culham village, Clifton Hampden and Abingdon, and result in development effectively connecting Culham village and Clifton Hampden. The development would be seen as a large “island” of housing set within a wider area of open countryside in the Green Belt.

22. The 2018 Green Belt Assessment of Strategic Sites confirms that the Culham site is the only one of the eight sites assessed which was not considered even a possibility to be removed from the Green Belt in the original 2015 Green Belt Study. And, significantly, it is the only proposal which involves the creation of a new settlement in the Green Belt as opposed to an extension to an existing settlement.
  
23. Nothing in the Oxford Green Belt Study, the South Oxfordshire Local Green Belt Study or the Green Belt Assessment of Strategic Sites gives any encouragement to the proposed strategic housing allocation at Culham. It is only considered to have a highly harmful impact on the Green Belt. This is clear evidence that the land at Culham cannot be considered suitable for such a large-scale development. There is no other evidence to suggest that the land might be considered suitable for development in Green Belt policy terms.
  
24. All of the evidence, therefore, points to the proposal's substantial harm to the Green Belt. This is significant given that Strategic Objective 7.1 of the Draft Local Plan says that "particular importance" will be placed on the value of the Oxford Green Belt in protecting and enhancing the natural environment and the landscape.

**Question 1: Why has the strategic housing site at Culham been proposed when the evidence demonstrates it would have a highly harmful impact on the purposes of including land in the Green Belt?**

**Question 2: Contrary to the evidence provided by all of the Green Belt studies, why does paragraph 4.72 of the Draft Local Plan assert that the Culham site is *"... at a distance from the special historic setting of the City of Oxford and does not make a significant contribution towards the purposes of including land in the Green Belt to check the unrestricted sprawl of Oxford City"* ?**

## Exceptional circumstances

25. Paragraph 136 of the NPPF says that Green Belt boundaries should only be altered in "exceptional circumstances". This issue is addressed in paragraphs 8.2.1 to 8.2.6 of the Strategic Site Selection Background Paper Part 2 (January 2019) which say, whilst it is inevitable that any proposed releases from the Green Belt *"will result in harm to some degree"*, there are two key "exceptional circumstances" to justify releasing Green Belt sites. These are, firstly, *"the unprecedented need for housing"* and, secondly, *"the significantly more sustainable options for strategic allocation that are available and deliverable on sites, albeit within the Green Belt."* In addition, the two following site specific "exceptional circumstances" are put forward relating to Culham:

- The additional land provides an opportunity to deliver housing adjacent to one of the major employers in southern Oxfordshire.
- Development in this location is at the heart of Science Vale and supports the delivery of *"much needed significant strategic infrastructure"*.

26. Regarding the above first key "exceptional circumstance", paragraph 5.14 of the Local Plan 2032 First Preferred Options said in June 2016:

*"We also prefer that this single location [for a strategic allocation of at least 3,500 dwellings] be outside the Oxford Green Belt. The need to supply more housing is not considered to be an exceptional circumstance for a review of the Green Belt and this is particularly the case as we have options which are not within the Green Belt. The Green Belt was a particular topic that was referenced by over half the respondents to our "Refined Options" consultation, with strong support for its protection."*

The Draft Local Plan and its evidence base have not explained what has changed since June 2016 to justify the volte-face and propose a strategic allocation of 3,500 dwellings in the Green Belt at Culham. This is particularly relevant given there is no current need for the total amount of housing now being proposed in the Draft Local Plan (see paragraph 2 above) and land in the Green Belt should only be released as a last resort.

27. In addition, the suggestion in the Draft Local Plan that the proposal to release 220 hectares of land from the Green Belt to create a new settlement at Culham *"will result in harm to some degree"* significantly underplays the scale of the harm. The evidence

demonstrates that the Culham proposal would have a highly harmful impact on the Green Belt (see paragraphs 13 to 24 above). This confirms that the extent of the harm has not been properly weighed in the balance against the purported two key "exceptional circumstances".

28. Regarding the suggested site specific "exceptional circumstances", the proximity of new housing to any employment site offers benefits only to those new residents who would work at the employment site. As the co-location of housing and employment land can only provide some people with opportunities and as the scale of that benefit cannot be quantified, this can best be described as a positive rather than an exceptional circumstance in Green Belt policy terms. In addition, there is no evidence to suggest that the proposed strategic housing allocation is essential to the realisation of the employment growth which the Draft Local Plan envisages taking place at Culham Science Centre up to 2034.
29. The location of the Culham strategic housing site at the heart of Science Vale is much less significant than its location within the Oxford Green Belt. Policy STRAT9 of the Draft Local Plan confirms that the reference to supporting the delivery of "*significant strategic infrastructure*" means, principally, providing significant financial contributions towards a new Thames river crossing and the Clifton Hampden by-pass. However, in planning policy terms, there is nothing "exceptional" about new development securing funding for the provision of new infrastructure - the development of any site can be required to support the delivery of necessary infrastructure. Securing funding for a new Thames river crossing and the Clifton Hampden by-pass, therefore, cannot constitute an "exceptional circumstance" to justify the proposed large-scale and harmful development in the Green Belt at Culham. This is particularly so in this case as other sources of infrastructure funding may well be available (see paragraph 70 below).
30. Taken together, the suggested "exceptional circumstances" have little substance. They can best be described as purported benefits and do not justify the proposed strategic allocations of 3,500 dwellings and 7.3 hectares of new employment land.

**Question 3: Why has the strategic housing site at Culham been proposed when there are no truly "exceptional circumstances" to justify such a large-scale and harmful development in the Green Belt?**

## Sustainability Appraisal

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31. The Sustainability Appraisal (SA) dated December 2018 which accompanies the Final Publication Version of the Draft Local Plan follows earlier Sustainability Appraisals accompanying the First and Second Preferred Options stages of the Local Plan process and the First Publication Version of the Draft Local Plan, which are dated June 2016, March 2017 and September 2017 respectively. Paragraph 1.2.4 of the current SA Report says that the SA:

*"... will help to ensure that a local plan is 'justified', a key test of soundness that concerns the extent to which the plan is the most appropriate strategy, when considered against the reasonable alternatives and available and proportionate evidence."*

32. Paragraph 1.1.3 of the SA Report says:

*"The SA appraises the environmental, social and economic performance of the Draft Local Plan and any reasonable alternatives. In doing so, it has helped to inform the selection of Plan options concerning (in particular) the quantum, distribution and location of future development in the district and identify measures to avoid, minimise or mitigate any potential negative effects that may arise from the Plan's implementation as well as opportunities to improve the contribution of the Draft Local Plan towards sustainability."*

33. To achieve these purposes and to provide consistency in the assessment of the Local Plan's options (i.e. including the selection of strategic development sites from 15 options), the SA employs 17 Sustainability Appraisal Objectives. Only one of these SA Objectives refers to the Green Belt (i.e. no. 8 relating to land use and conserving open spaces and the countryside), and that reference is subsumed by other considerations such as the AONB, biodiversity, cultural assets, and agricultural land quality. This is confirmed by paragraph 7.5.48 of the SA Report which says:

*"Objective 8 relates to efficiency in the use of land and the SA focuses on the extent to which sites would involve the use of brownfield land or the loss of best and most versatile agricultural land and potential for impacts on landscape."*

34. This explains why the Green Belt is not mentioned once in the brief appraisal of the strategic site options under the 17 Objectives given at paragraphs 7.5.37 to 7.5.59 of the SA Report or in the commentary under SA Objective 8 in Appendix I, "Options for Strategic Sites", or Appendix P, "Strategic Sites". As a result, the SA makes no appraisal of the effects of the strategic development site options on the Green Belt and makes no reference to the finding of the Green Belt Assessment of Strategic Sites that the proposed strategic housing allocation at Culham would have a highly harmful impact on the Green Belt. This is a significant omission which undermines the declared purposes of the SA (see paragraphs 31 and 32 above).
35. The current SA's omission of any appraisal of the effects of the strategic development site options on the Green Belt is in stark contrast to previous Sustainability Appraisals. The appraisals of the site options given in Tables 7 and 8 of Appendix A of the SA dated March 2017, for example, include many references to the Green Belt resulting in scores of "significant negative effects" under SA Objective 8 for all of the sites which lie within the Oxford Green Belt. In addition, Table 7 of the SA Report dated March 2017 confirms that the appraisal of the housing distribution options did *"take account of existing policy designations such as Green Belt and Area of Outstanding Natural Beauty"*. As with previous SAs, therefore, the current SA should take into account Green Belt effects when assessing the strategic site options, particularly as (unlike the SHELAA dated October 2017) it does not adopt a "policy off" approach.

**Question 4: Why has the Sustainability Appraisal's assessment of the strategic development site options not taken into account effects on the Green Belt?**

36. Appendix I of the current SA also includes inconsistencies in considering the effects of the 15 strategic development site options under Sustainability Appraisal Objective 8 relating to land use and conserving open spaces and the countryside. Under SA Objective 8 the site options relating to Harrington, Lower Elsfeld, East of Caversham Park and Berinsfield all score "significant negative effects" for the following reasons:
- *The site currently compromises an extensive tract of rural landscape, therefore there is potential for a significant change in landscape and landscape character.*

- *Given the nature and scale of development and the strong rural character that characterises the site, significant negative effects are anticipated in relation to landscape.*
- *The development of the site would also have significant negative effects on the surrounding landscape due to a large part of the site changing from open countryside to residential development.*

However, by contrast, the Culham site option scores partial "significant positive effects" under SA Objective 8 on the basis that the eastern portion of the site (i.e. Culham Science Centre), in landscape terms, has a high capacity for further development and there is the potential to provide mitigation. This is inconsistent as the housing element of the Culham option comprises a substantial new settlement in the open countryside and is on a significantly larger scale than the Lower Elsfeld, East of Caversham Park and Berinsfield options. The greater "significant negative effects" on the landscape of the housing element in the Culham option should not be diluted by the employment element re-using brownfield land. In addition, the partial "significant negative effects" of the Culham option (i.e. relating to the northern part of the site) should not be adjusted to a "neutral score with regard to landscape in the absence of mitigation" as no other site option has had its negative score moderated by any reference to mitigation.

37. The March 2017 SA scored the Culham site option "significant negative effects" under SA Objective 8 due to the harmful impact on the landscape and the Green Belt. To be consistent (i.e. in relation to both the March 2017 SA and the assessment of other site options in the current SA), the Culham site option should continue to score "significant negative effects" due to its dramatic impact on the landscape and the Green Belt.

38. In addition, it is important to note the findings of an Environmental Scoping Report dated October 2017 prepared on behalf of CEG and included on the Council's website under application no. P17/S3719/SCO. The report is a preliminary stage in the preparation of an Environmental Statement which is intended to accompany an outline planning application for a residential led mixed use development on the proposed strategic allocations at Culham. Paragraph 13.23 of the report confirms that, following a soil survey, 186 hectares of the land included within the proposed strategic allocations at Culham comprises Best and Most Versatile agricultural land - i.e. grades 2 and 3a.

This adds further weight to the need for the Culham option to score "significant negative effects" under SA Objective 8.

**Question 5: Why is the Sustainability Appraisal inconsistent in its appraisal of the strategic development site options in relation to SA Objective 8 relating to land use and conserving open spaces and the countryside?**

39. Table 6.3 on page 148 of the current Sustainability Appraisal Report recognises that the Draft Local Plan proposes a substantial over-provision of housing when it says that the housing supply figure "far exceeds the need figure" to allow for flexibility and to ensure that delivery can be managed across the plan period.
40. Table 7.7 of the SA Report, "Reason for rejecting sites after initial assessment", explains why five of the original 15 site options have been rejected. However, it is not explained how Table 7.6, "Summary of Performance against the SA Objectives for Strategic Sites", and / or paragraphs 7.5.37 to 7.5.59 of the SA Report have informed and led to the selection of the Culham site. It is not clear how the negative and positive effects of each option have been collated or whether some effects either have been or should be weighted. For example, what are the reasons for rejecting the Harrington site option and why do those reasons carry more weight than the obvious Green Belt, landscape and other objections to the Culham site? The Strategic Site Selection Background Paper Part 2 (January 2019), which now forms part of the evidence base and is intended to address this issue, is considered below.



## Strategic site selection

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41. The Strategic Site Selection Background Paper Part 2 supplements the Sustainability Appraisal and provides a seven stage site selection process which has led to the proposed allocation of the seven strategic housing sites. Paragraph 4.2.6 confirms that the Culham housing site is *"a new settlement"*. Paragraph 4.2.11 says that the original area of search for a new settlement *"...encompasses the area in the heart of South Oxfordshire that falls outside of the Green Belt to the north and the AONB to the south, as shown on in Appendix 2."* Paragraph 4.2.12 supplements that by saying *"the area considered suitable for a new settlement had also been expanded to include the Science Vale as this covers the part of the district where there is a focus on delivering housing and economic growth..."* However, nothing more is said to indicate that Green Belt land might now be considered to accommodate a new settlement.
42. Table 8, Summary of Conclusions, says on page 76 that the Culham site *"scores very well in the detailed appraisal"*. This follows a detailed appraisal of the Culham site which was carried out under Stage 5 of the site selection process and is included in Appendix 6. This information provides the Council's justification for the proposed strategic housing allocation at Culham. However, the following flaws in the detailed appraisal of the Culham site at Appendix 6 undermine the credibility of the conclusion that the site *"scores very well"* which, in turn, confirms that the inclusion of the Culham site as a strategic housing allocation cannot be justified.
43. Firstly, under the headings "Housing & Infrastructure" and "Business in Science Vale", the detailed appraisal at Appendix 6 says that the Culham site is required to facilitate the new Thames river crossing and that, without it, Oxfordshire County Council is effectively placing an embargo on further development at Culham Science Centre on traffic generation grounds. As a result, it is asserted that *"...one of SODC's best science and technology parks would be constrained without the adjoining housing provision being delivered."* However, as set out in paragraphs 67 to 72 below, there is nothing "exceptional" in planning policy terms about new development securing funding for the provision of new infrastructure. Securing funding for a new Thames river crossing, therefore, cannot justify the proposed large-scale and harmful development in the Green Belt at Culham. In addition, it is not known how much developer funding has already



been raised or how much Government funding is being made available to deliver a new Thames river crossing and, as a result, how much additional funding may be required. Accordingly, further large-scale development in the Green Belt should not be promoted through the Draft Local Plan to justify raising the an unknown amount of funding for a new Thames river crossing which has already been largely or wholly justified by existing development commitments and is the subject of potential Government funding.

44. Secondly, under the heading "Housing & Infrastructure", Appendix 6 says that, by locating housing adjacent to an employment centre of international significance, the Culham site has the benefit of *"significantly reducing the need to travel"*. And under the heading "Spatial Strategy", Appendix 6 says that *"the development of housing at this location would support the growth of one of the district's best Science and Technology Parks and help to retain and expand a skilled workforce"*. However, as set out in paragraph 28 above, this significantly over-states the potential benefit of co-locating employment and housing sites and there is no evidence to suggest that the proposed strategic housing allocation is essential to realising the employment growth planned at Culham Science Centre up to 2034.
45. Thirdly, under the heading "Landscape, Open Space and Countryside", Appendix 6 says that development of the Culham site could be mitigated by *"landscape improvements and structural planting"* and *"appropriate masterplanning and policy requirements"*. However, the extent to which these measures could mitigate such a large-scale and intrusive development is highly uncertain. In addition, if sufficient landscaping could substantially obscure views of the new development it would also all but eliminate the current attractive, panoramic views across the countryside (see paragraphs 53 to 58 below). Harm, therefore, would be caused both to the landscape and openness of this part of the Green Belt and to the recreational opportunities it currently provides.
46. Fourthly, under the heading "Landscape, Open Space and Countryside", Appendix 6 again attempts to dilute the significant negative effects on the landscape of the proposed housing element in the Culham strategic option by referring to the benefits of the employment element re-using brownfield land (see paragraph 36 above).

47. Fifthly, under the heading "Landscape, Open Space and Countryside", Appendix 6 underplays the amount of Best and Most Versatile agricultural land which would be lost by the proposed housing allocation at Culham when it says:

*"The majority of the site is classified as Grade 3 agricultural land, with some Grade 2 around Warren Farm to the north of the site."*

This reiterates what Table 6, Summary of general appraisal and recommendations for progression to detailed appraisal, says on page 35:

*"Agricultural land across most of the site is of low value (Grade 3), the remainder is Grade 2 but this is limited to a small part of the potential allocation to the north east of Warren Farm."*

However, most of the land at Culham is not "of low value". 186 hectares comprises grades 2 and 3a agricultural land (i.e. Best and Most Versatile) as explained in paragraph 38 above.

48. Sixthly, under the heading "Sustainability Appraisal (SA)", Appendix 6 does not even mention SA Objective 8 (relating to land use and conserving open spaces and the countryside). As a result, the Culham housing site's dramatic and harmful impact on the landscape is again underplayed and the SA is again shown to be ineffectual in relation to appraising Green Belt effects.

49. Finally, under the heading "Other Evidence Base Considerations" relating to Green Belt harm, Appendix 6 says the following to justify the strategic housing site at Culham despite the strong Green Belt objections:

*"The [2018 Green Belt] study concludes that the release of sections of 08b and all of 08c would have a less than 'High' effect, scoring 'Moderate High' and 'Low Moderate' respectively. Releasing just the southern half of parcel 08b would reduce the degree of encroachment on the countryside by limiting the area affected, and by maintaining visual openness along the ridge above the river valley. It would also contain new development to an area already framed by existing development to the east and west. However, release of this section of the parcel would still affect the settlement gaps to the south. Parcel 08c, although in isolation does not represent a strong urbanising*

*influence, the existing built development, proximity to Culham Science Centre and containment by the railway line combine to limit the effect that an intensification of development would have on the wider countryside."*

50. This again underplays the harmful impact the Culham strategic housing allocation has on the Green Belt by implying that the proposal does not affect any Green Belt land ranked as "high" in the 2018 Green Belt Study. This is clearly wrong as 82.3 hectares of the proposed strategic housing allocation (i.e. over half of the proposed housing development area) is ranked as "high" in the 2018 Green Belt Study. This issue is addressed in paragraphs 20 to 24 above. The conclusion of the detailed appraisal of the Culham housing site in Appendix 6 subsequently says:

*"In terms of Green Belt harm this site is very sensitive to the eastern edge with two studies suggesting that this area contributes strongly to the Green Belt. There are unique exceptional circumstances to the release of green belt to enable development here, and the benefits that development brings to unlock infrastructure in this critical part of Science Vale far outweigh the harm that green belt release would cause."*

51. The conclusion, therefore, simply asserts there are "*unique exceptional circumstances*" to justify the proposed allocation of the Culham housing site. However, as explained above, none of these "*unique exceptional circumstances*" stand up to scrutiny and cannot justify the proposal's significant harm to the Green Belt.
52. Finally, as with the Sustainability Appraisal, it is still not clear how the Strategic Site Selection Background Paper has collated and weighed the negative and positive effects of each potential strategic site. For example, why do the reasons for rejecting the Harrington site option carry more weight than the obvious Green Belt, landscape and other objections to the Culham site?

**Question 6: How have the Sustainability Appraisal and the Strategic Site Selection Background Paper Part 2 collated or assessed the effects of each of the strategic development site options resulting in the selection of the strategic housing site at Culham?**

## Landscape and visual impact

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53. The proposed strategic housing allocation at Culham comprises a large swathe of open countryside close to the River Thames. The site is particularly prominent in views from public footpaths to the north, west, and east including the Thames Path and the Green Belt Way. The Landscape Character Assessment (LCA) (November 2017) in the Draft Local Plan's evidence base includes the Culham site within the Nuneham Courtenay Ridge Landscape Character Area. However, the LCA does not assess the capacity of the local landscape to accommodate such a large-scale development. The Landscape Capacity Assessment Update (October 2018) and the Landscape Sensitivity Assessment - Potential Strategic Allocations (January 2018) are now included in the evidence base, and these documents have informed the Strategic Site Selection Background Paper Part 2 (January 2019).
54. The Landscape Capacity Assessment Update (October 2018) updates the previous Landscape Capacity Assessments relating to Sites on the Edge of the Larger Villages (2015) and Sites on the Edge of the Four Towns (2017). These previous Assessments include detailed reports on the potential capacity of each edge-of-settlement site to accommodate new development on landscape and visual grounds. However, as the proposed strategic housing allocation at Culham does not lie on the edge of a larger village or one of the four towns, none of the three Landscape Capacity Assessments include a detailed report on the capacity of the landscape to accommodate the proposed large-scale development at Culham. Instead, only a summary of the landscape sensitivity issues relating to the Culham site are included in Appendix 2.
55. The Landscape Sensitivity Assessment - Potential Strategic Allocations (January 2018) provides a more detailed analysis of the Culham site. Table 1 summarises the landscape quality and sensitivity of the potential strategic allocations and says the following in relation to the Culham site west of the railway line:

*"High scenic quality; Strong sense of place; Intrusive elements uncommon; Frequent heritage assets; Low visual sensitivity; Moderate sensitivity to change."*

56. Table 2 provides a Phase 1 assessment of the potential strategic allocations and says the following in relation to the Culham site west of the railway line:

*"Visually prominent in views from roads and public rights of way including Oxford Greenbelt Way. Potential harm to settlement pattern and separation of Clifton Hampden / Culham Science Centre and Culham village and extensive area of open and somewhat exposed farmland; potential harm to the setting of and views from Oxford Greenbelt Way."*

57. The Phase 2 report on the potential strategic allocation at Culham and the accompanying record sheets at Appendix A confirm that the land west of the railway line has a Medium / High visual susceptibility to change due to its openness and prominence in public views, including *"panoramic views across countryside to the south"*, and a Medium / High wider landscape susceptibility to change due to its open and exposed character and its links to the surrounding landscape.

58. The Landscape Sensitivity Assessment - Potential Strategic Allocations, therefore, reinforces the findings of the Green Belt Assessment of Strategic Sites and confirms that the proposed strategic housing allocation at Culham would cause a significant level of harm to the visual amenity and landscape character of the area. It is highly uncertain whether the mitigation measures set out under the heading "Recommendations" on page 73 could mitigate such a large-scale and intrusive development. In any event, such mitigation measures would all but eliminate the current attractive, panoramic views across the countryside referred to in the Landscape Sensitivity Assessment - Potential Strategic Allocations.

59. Apart from brief comments under the "Recommendation" headings in the Phase 2 reports on each strategic development site option, there is no proper explanation as to how the Landscape Sensitivity Assessment - Potential Strategic Allocations has determined which of the five strategic development site options which score an overall landscape rating of Medium / High should be progressed to be considered further as potential strategic allocations. Why, for example, has it been decided that Harrington should not progress whilst Culham west of the railway line should progress? The following generalised reasons given on page 87 for not progressing Harrington apply equally to the proposed new settlement at Culham:

*"Development within a part of the area could adversely affect the whole and would not relate well to any of the nearby settlements, and could erode the separate identities of the villages. The approach to and setting of Great Haseley Conservation Area could be affected and panoramic and elevated views could be lost. The strong rural character and contribution the area makes to the wider landscape is important."*

**Question 7: How has the Landscape Sensitivity Assessment - Potential Strategic Allocations determined which of the strategic development site options with an overall landscape rating of Medium / High should be considered further as potential strategic allocations on landscape and visual grounds?**

60. The open countryside location of the Culham site also raises questions about the Strategic Housing and Economic Land Availability Assessment (SHELAA) (October 2017). Figure 3 of the SHELAA explains that its methodology has changed compared to that of the previous HELAA on the issue of a site's relationship with an existing settlement. Figure 3 says that: *"sites which are in an isolated location and do not relate well to an existing settlement or do not accord with the settlement hierarchy as defined in the spatial strategy of the emerging Local Plan have been assessed as unsuitable."* The reason given for the change is: *"Since work was undertaken to the previously published HELAA, the Council has published its spatial strategy for growth in the district. The PPG infers emerging plan policy should be considered when assessing the suitability of sites or broad locations for development."*
61. This confirms that the proposed site allocations in the Draft Local Plan are classed as "suitable" for development simply because they are proposed allocations. Which is why, in Appendix B of the SHELAA, the Culham site (site no. 1095) is classed as "suitable" for development. However, in the light of the updated methodology set out in Figure 3 of the SHELAA, there is an obvious contradiction here in that the Culham site lies in the open countryside and so does not relate at all to an existing settlement and does not accord with the Draft Local Plan's settlement hierarchy. There is no further information in the SHELAA to address the contradiction of the Culham site failing a key test regarding its suitability for development but, nevertheless, being classed as "suitable" simply because it is a proposed allocation.

## Transport

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62. The proposed strategic housing and employment allocations at Culham would generate significant peak hour traffic movements, all of which would have to gain access via the A415. However, the Draft Local Plan's evidence base includes no information on the likely traffic generation from the strategic developments or whether the local road network could be improved to cope with the significant increase in peak hour traffic flows.

63. The introductions in both of the Evaluation of Traffic Impacts (ETI) Stages 2 and 3 (dated October 2017 and January 2019 respectively) say:

*"One of the main purposes of the ETI is to inform the selection of strategic development sites to be allocated in the Local Plan 2034 and to help identify a package of highway mitigation to ensure the plan contributes towards the delivery of sustainable development." And:*

*"Atkins has undertaken a technical modelling assessment of the Local Plan to understand likely transport impacts on the strategic highway network. The modelling assessment is part of a staged process to inform decision making. More detailed work is on-going between the District Council, County Council and others to review local impacts of proposed developments and potential mitigation measures associated with growth."*

64. The ETI Stage 2 confirms that the A415 is forecast to exceed its capacity in the morning and evening peak hours in all of the development scenarios, including the Do-minimum Scenario (i.e. not including the Draft Local Plan proposals) and either with or without a new Thames river crossing. The ETI includes information on additional delays on the road network under the different scenarios - i.e. additional delays of up to 276 vehicles on the A415 in the morning peak hour in 2031. However, there is no information on the consequences of this in terms of the extent to which the A415's capacity would be exceeded (with or without a new Thames river crossing) compared to the Do-minimum Scenario or whether the local road network could be improved to cope with such an increase in traffic.



65. The ETI Stage 3 dilutes the findings of the ETI Stage 2 by saying that the A415 under most of the development scenarios is *"forecast to operate near or at capacity."* There is no further information to justify this changed stance. Scenario 5B includes the Draft Local Plan's proposed strategic developments and the ETI Stage 3 says the following at paragraph 5.10.2:

*"Scenario 5B includes a western alignment of the Thames River Crossing. This alignment allows for a more even distribution of demand along the proposed link. The layout of Culham access junctions has also been refined in this assessment to accommodate improved operational performance. The refined design and consideration of the Culham Didcot Thames River Crossing western alignment is forecast to operate below capacity during the evening peak. Dual access points to the development at Culham are also forecast to relieve congestion along the A415. Refinement of the detailed design of the Culham Crossing may be required to ensure the planned scheme operates as intended."*

However, no further information or evidence is provided to explain or justify the above general comments.

66. The introductions in both of the ETI Stages 2 and 3 confirm that the gathering of necessary evidence (i.e. *"more detailed work"*) is still on-going. This is reinforced by paragraph 4.74 of the Draft Local Plan which says:

*"There is a significant amount of further detailed transport modelling and transport assessment work to support development and delivery of these schemes, including the Culham Crossing. This work, including development of a more detailed Micro-simulation transport model for Didcot Garden Town, is being progressed and funded in partnership with Oxfordshire County Council and Vale of White Horse, and will give an understanding in more detail of the impact and phasing of homes and jobs in the area linked to required infrastructure. This evidence will be used alongside other evidence, including the outputs of Transport Assessments from the proposed new development, to inform any limitations on the level of homes at the site linked to infrastructure funding to be set down at planning application stage."*

The current lack of evidence means that the ETI cannot fulfil its own purpose of informing the strategic development site selection process.



**Question 8: Why has no detailed transport work been carried out regarding the proposed strategic allocations at Culham to inform the strategic development site selection process - particularly in relation to the likely harmful impact on the A415?**

## **New Thames river crossing**

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67. Policy STRAT9 of the Draft Local Plan confirms that the proposed strategic allocations at Culham are largely driven by the desire to secure funding for a new Thames river crossing and the Clifton Hampden by-pass. A new Thames river crossing is clearly what paragraph 4.72 of the Draft Local Plan is principally referring to when it says that *"the delivery of much needed significant strategic infrastructure"* is an "exceptional circumstance" to justify removing the Culham sites from the Green Belt. However, in planning policy terms, there is nothing "exceptional" about new development securing funding for the provision of new infrastructure - the development of any site can be required to support the delivery of necessary infrastructure. Securing funding for a new Thames river crossing, therefore, cannot constitute an "exceptional circumstance" to justify the proposed large-scale and harmful development in the Green Belt at Culham.
68. Paragraph 4.74 of the Draft Local Plan confirms that funding for a new Thames river crossing would come from a variety of sources *"including developer funding, Garden Town and other government funds not yet confirmed."* As such, *"there is a significant amount of further detailed transport modelling and transport assessment work to support development and delivery of these schemes, including the Culham Crossing."* It is not known, therefore, how much developer funding would be required to deliver a new Thames river crossing and, consequently, how much development at Culham would be required to make an appropriate contribution to that funding.
69. In addition, paragraph 5.3 of the Transport Topic Paper confirms that the need for a new Thames river crossing has already been largely or wholly established by existing development commitments when it says:

*"The need for these schemes [including a new Thames River Crossing] has already been established to support development in Didcot as allocated in the South Oxfordshire Core Strategy and Vale of White Horse Local Plan 2031 Part 1."*

Further large-scale development in the Green Belt, therefore, should not be promoted through the Draft Local Plan to justify raising an unknown amount of funding for a new Thames river crossing the need for which has already been largely or wholly justified by existing development commitments.

70. In addition, Oxfordshire County Council announced on 5 February 2019 that it has submitted a bid for Government funding for four new road projects around Didcot, including a new Thames bridge at Culham and a Clifton Hampden by-pass. The £218 million would come from the Government's Housing Infrastructure Fund and the bid says the money is needed to support the expected population growth in the area over the next 10 years. The outcome of the funding bid is expected by early summer 2019.
71. There is a lack of transparency about how much funding has already been or is likely to be secured to provide a new Thames river crossing and, as a result, the need to secure additional funding has been given disproportionate weight in the Draft Local Plan. A new river crossing is being promoted as a vital piece of infrastructure which needs additional funding through the Draft Local Plan's allocations, and the proposed strategic allocations at Culham confirm that the Council believes the sacrifice of 301 hectares of Green Belt land is a price worth paying to realise such a "Grand Project".
72. Disproportionate weight, therefore, has been given to securing an unknown amount of funding for a new Thames river crossing in the selection of the Culham strategic development sites.

**Question 9: Why has disproportionate weight been given to securing funding for a new Thames river crossing in the selection of the strategic development sites at Culham when such a matter does not constitute an "exceptional circumstance" to justify the proposed large-scale and harmful development in the Green Belt and when the need for a new river crossing has already been largely or wholly established by existing development commitments?**

## Conclusion

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73. "Exceptional circumstances" do not exist to justify the proposal to remove 301 hectares of land at Culham from the Green Belt, particularly as the release of Green Belt land should be a last resort after all other development options have been exhausted and as the Draft Local Plan is proposing an amount of new housing which exceeds current needs. The purported benefits set out by the Council do not amount to "exceptional circumstances" and so do not justify the proposed strategic housing site at Culham.
74. To try to justify the proposed strategic housing site at Culham, the Council repeatedly underplays its harmful impacts on the Green Belt and the landscape and overplays the purported benefits. The evidence shows that the large-scale development itself and the potential mitigation measures would cause significant harm to the openness and purposes of the Green Belt and character of the landscape, and the current attractive, panoramic views across the countryside would be all but eliminated.
75. In addition, insufficient evidence has been provided on the capacity of the landscape or the local road network (particularly the A415) to accommodate the proposed large-scale developments at Culham, and disproportionate weight has been given to securing funding for a new Thames river crossing in the selection of the Culham strategic development sites. There is also no evidence to suggest that the proposed strategic housing allocation is essential to the realisation of the employment growth which the Draft Local Plan envisages at Culham Science Centre up to 2034.
76. Further to the above objections, this report has raised the following 9 questions:
1. Why has the strategic housing site at Culham been proposed when the evidence demonstrates it would have a highly harmful impact on the purposes of including land in the Green Belt?
  2. Contrary to the evidence provided by all of the Green Belt studies, why does paragraph 4.72 of the Draft Local Plan assert that the Culham site *is "... at a distance from the special historic setting of the City of Oxford and does not make a significant contribution towards the purposes of including land in the Green Belt to check the unrestricted sprawl of Oxford City" ?*

3. Why has the strategic housing site at Culham been proposed when there are no truly "exceptional circumstances" to justify such a large-scale and harmful development in the Green Belt?
4. Why has the Sustainability Appraisal's assessment of the strategic development site options not taken into account effects on the Green Belt?
5. Why is the Sustainability Appraisal inconsistent in its appraisal of the strategic development site options in relation to SA Objective 8 relating to land use and conserving open spaces and the countryside?
6. How have the Sustainability Appraisal and the Strategic Site Selection Background Paper Part 2 collated or assessed the effects of each of the strategic development site options resulting in the selection of the strategic housing site at Culham?
7. How has the Landscape Sensitivity Assessment - Potential Strategic Allocations determined which of the strategic development site options with an overall landscape rating of Medium / High should be considered further as potential strategic allocations on landscape and visual grounds?
8. Why has no detailed transport work been carried out regarding the proposed strategic allocations at Culham to inform the strategic development site selection process - particularly in relation to the likely harmful impact on the A415?
9. Why has disproportionate weight been given to securing funding for a new Thames river crossing in the selection of the strategic development sites at Culham when such a matter does not constitute an "exceptional circumstance" to justify the proposed large-scale and harmful development in the Green Belt and when the need for a new river crossing has already been largely or wholly established by existing development commitments?

77. The overall conclusion is that the Draft Local Plan's proposed strategic housing allocation at Culham is not soundly based as it is **not justified** and is **not consistent with national policy** in relation to protecting Green Belts from harmful development. The proposed strategic allocation at Culham fails these two tests of "soundness" as set out in paragraph 35 of the National Planning Policy Framework.

13 February 2019