

19 December 2017

Rt Hon Chris Grayling, Minister for Transport Department for Transport Great Minster House 33 Horseferry Road London SW1P 4DR CPRE Oxfordshire 20 High Street Watlington Oxfordshire OX49 5PY

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working locally and nationally to protect and enhance a beautiful, thriving countryside for everyone to value and enjoy

Dear Mr Grayling,

## CaMkOx Growth Corridor:

Call for a Public Inquiry into the need and possible routing of an Expressway

Following the Chancellor's endorsement of the NIC's *Partnering for Prosperity* recommendation to develop an Oxford-Cambridge Growth Corridor, Highways England (HE) is now engaging with Stakeholders on Stage 1a of the Expressway which, with East West Rail, will be at its core.

Stage 1a will determine not only the overall corridor choice but also which of the sub routes, largely confined to Oxfordshire, will be chosen.

The western section, the Oxfordshire end, currently involves fundamentally different choices of Oxford sub-route options, from the A34 south of Oxford to the north-east of the City, where they join the chosen corridor. In summary, the Oxford sub-route choices are between:

- 1. Passing to the west, then north of Oxford, continuing to Junction 9 of the M40, by essentially upgrading the existing A 34;
- 2. Passing to the south, then east of Oxford, by striking off a new Expressway from the A34, near to the City and on to Bicester or Aylesbury; or
- 3. Also passing south, then east of Oxford, with the Expressway leaving the A34 further south (perhaps south of Didcot), and then on to Aylesbury.

These fundamentally different route corridor choices will also affect - indeed will determine - where the 'transformational growth' and consequential development the Expressway is supposed to facilitate will be sited. Whereas previous strategic roads have been 'corridors of movement not development', the NIC elevates development objectives for the Expressway above others, particularly in the Oxford area.

Needless to say, these routes would involve the Green Belt and/or the AONB, and encompass many historic and culturally valued small communities, protected under former and emerging Local Plans.

A great many lives will be adversely affected by the choice, as will the composition of this largely rural County.

The previous work of the National Infrastructure Commission (NIC) appears to have been accepted as the factually correct starting point for the Highways England engagement process. This is despite the NIC final report never being subject to an adversarial in depth analysis or independent inspection process. CPRE contends that the whole concept of the Oxford Cambridge Growth Corridor is in reality a subregional plan or a joint spatial strategy either of which would require far more comprehensive public consultation than is currently being envisaged. It is not acceptable that eventual public consultation on a final route is substituted for comprehensive, independent, transparent examination of the need for and consequences of the transformational growth being promoted without any reference to the views of the public.

At present it is HE's intention to inform its decision-making through engagement with discreet Stakeholder groups representing Infrastructure, Customers, Environment Groups, etc. Our recent attendance at the Strategic Environment Stakeholder Reference group has confirmed our concerns that these groups are likely to be ineffective in gathering the critical information to ensure that the environmental and landscape consequences of the proposals are adequately considered.

The result will be that HE will need to consider the merits of what has been heard from individual members of the discreet groups, and then weigh the evidence from one group as against another. Although HE has indicated that it will make its scoring system known, the intended process is far from satisfactory for three reasons:

- 1. The public is excluded and will not have a say in a decision which will so fundamentally affect their lives and livelihoods.
- 2. The process and its wholly inappropriate duration (decision in effect by Spring 2018) prevents extensive evidence gathering in the necessary depth to consider all the environmental consequences across corridors AB&C and up to 4 sub routes in Oxfordshire.
- 3. The final decision itself will be made behind closed doors, leading to inevitable concerns that it may not be fair and certainly not transparent or open.

This may well have serious political repercussions, quite apart from provoking widespread public concern. What exactly is the evidence for making such a fundamental change to constituents' lives and the countryside? How has it been tested? More generally: How will comparative objective assessment be made against the ever-changing economic forecasts? Which other parts of the country has it been considered alongside? Answers to these questions will crucially affect public acceptance of the growth corridor and most critically the Expressway and its route.

CPRE has repeatedly called for far greater public engagement. The Oxfordshire Growth Board, considered by the NIC in its report to be a template on which the governance of the Corridor should be modelled, agreed to write in support of our call (in a written answer to a question put to its meeting on November  $30^{\rm th}$ ).

However, a public consultation alone is not enough. In order to guarantee transparency, the choice of corridor needs to be decided by way of a Public Inquiry. This has been supported by Oxfordshire County Council who passed a motion on the 12<sup>th</sup> December also calling for a Public Enquiry into the need for the road and the selection of a route.

This is not without precedent. The second M40 Inquiry - again largely concerned with routing through Oxfordshire - also considered a number of widely different

alternatives. It is significant that Inquiry followed an Inquiry into a single route, which was rejected. If that first Inquiry had examined a variety of routes (or corridors as expressed in current terminology), the rejected single route (which was shorter, quicker and cheaper) might well have been chosen.

We are therefore requesting you - as a matter of urgency - to ensure that a Public Inquiry, as well as a public consultation, is commissioned as part of the process to determine the need for and effects of the "Growth Corridor concept" and which of the corridors and Oxford sub route options are chosen.

There may be some slippage in the timetable for HE's Stage 1a, but this will be more than compensated for by the public confidence generated from greater transparency and the reduction in the likelihood - the very real likelihood - of legal challenges to a decision made behind closed doors, as HE presently intends.

Yours sincerely,

Dr P.J. Collins, Chairman, CPRE Oxfordshire

Deter Callins

CC

Rt Hon Michael Gove, Secretary of State, Department for the Environment, Food and Rural Affairs

Lord Adonis, Chairman, National Infrastructure Commission

Oxfordshire MPs - Robert Courts MP, Anneliese Dodds MP, John Howell MP, Layla Moran MP, Victoria Prentis MP, Ed Vaizey MP

Oxfordshire local authority leaders - Cllrs Matthew Barber, John Cotton, Ian Hudspeth, James Mills, Bob Price, Barry Wood

Nigel Tipple, Chief Executive, Oxfordshire LEP

Bev Hindle, Strategic Director for Communities, Oxfordshire County Council