



THAME

Town Council

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Graham Hunt, Town Clerk & RFO

Chris Grayling MP
Secretary of State for Transport
Department for Transport
LONDON
SW1P 4DR

4 July 2018

Dear Minister

The Oxford-Milton Keynes-Cambridge Expressway

Thame was a front-runner in terms of Neighbourhood Planning, was one of the first areas to have a Neighbourhood Plan adopted and is a strong advocate for the continued success of Neighbourhood Plans. We enjoy specific support from our MP, John Howell.

With detailed planning permission already granted for 620 out of 775 allocated dwellings, of which over 350 are already built and occupied, Thame is an exemplar in proving that Neighbourhood Planning speeds up development in appropriate and sustainable locations. With windfalls included, of which another 106 are already occupied, we expect close to 1000 new dwellings being built in Thame by the end of 2019, just 6 years into the plan.

Thame has, therefore, more than fulfilled its responsibilities as a Neighbourhood Plan Area. With a mind to these responsibilities, the Town has taken great interest in the discussions regarding the choice of corridor for the proposed Oxford-Milton Keynes-Cambridge Expressway.

This is a decision that is critical to us, as one of the proposed routes would skirt Thame's ring road, along the current line of the A418, the M40 – Aylesbury road. Against this background, we are aware that other parishes and towns across South Oxfordshire have been disappointed that Thame Town Council has not expressed an opinion on the choice of corridor for the proposed Oxford – Milton Keynes – Cambridge Expressway. This matter has been discussed by the Town Council in both public and private meetings and the view of the Town Council has been, until this point, to observe. We are not in a position to either decide for or against a corridor close to Thame. This is largely because of the paucity of information in the public domain that would enable Thame to make an informed decision on the corridor choice.

While examining the limited evidence base in front of us, it has been noted that we have no record of being invited to participate in the consultation on the Expressway that took place between May and August 2016. We had believed this was an individual case of oversight, but now know that this experience has been shared by Parish and Town Councils across South Oxfordshire. We can now only express our disappointment that this happened.

Thame Town Council has recently looked more closely at the comments and evidence produced by Expressway stakeholders. There is clearly much disquiet among the stakeholders. It was particularly alarming to note that England's Economic Heartland Strategic Alliance (EEH), an organisation consisting of 11 local and county authorities and LEP groups, were similarly unable to provide an informed choice between the three corridor options, in spite of having access to a greater evidence base (letter to Secretary of State for Transport, 20 April 2018). This is especially pertinent given the fact that the Treasury have commissioned EEH to investigate how communities not on the Expressway route could benefit from it (HM Treasury Policy Paper, 22 November 2017). If EEH, a sizeable consortium with ready access to transport specialists, demographers and town planners are unable to suggest a corridor that

would provide benefits to wider communities, it strongly suggests that the current evidence for the corridor choice is not fit for purpose.

Thame Town Council has two concerns over the method used to bring forward the corridor choice. Firstly, the corridor is perceived as a regional strategy, as it is prescribing transport infrastructure on the basis of related housing and employment allocations. The options for the corridor and growth sub-options do not, however, appear to have been subject to a Sustainability Appraisal (SA). Mention is made of a Strategic Appraisal which appears to have taken into account socio-economic objectives, such as the role of the corridor in delivering access to jobs and in relieving congestion (Oxford to Cambridge Expressway Strategic Study: Stage 3 Report, *Addressing the socio-economic corridor challenges*). Although undoubtedly important, no specific attention has been paid, for example, to the role the corridor could play in affecting the well-being of current and future residents, i.e., the social aspect, through reducing the need to travel to work or local services. This is pertinent as the delivery of the corridor's settlement aspirations will be made through local development plans, which must be subjected to sustainability appraisal. In order to be compatible, the social, economic and environmental impact of development plan proposals must be examined both in turn and as a whole from the start of the plan making process. If reasonable alternatives between the short-listed corridors have not been adequately addressed in a way that is compatible with the SA process then it is possible that each local authority land use plan will be open to legal challenge at the point at which adoption is sought.

Secondly, as the Expressway route will be brought through the NSIP process, any assumed development may not happen, as there will be no statutory, regional plan through which proposed housing, employment and leisure areas will be assigned as areas of search. It was a strong recommendation by the NIC that single, joint planning authorities were formed along the Oxford – Cambridge Arc, in order to ensure alignment of plan making along the route. The Town Council is not aware that this recommendation is being followed; instead, it appears that the partner authorities will rely on promises and memoranda. Within Oxfordshire, a joint spatial strategy is being discussed. This is, both bound to the Oxfordshire Growth Deal, and currently, wholly without terms of reference. Given recent history, there is little confidence locally that the joint spatial strategy will either emerge or be adhered to, ultimately leaving a defined Expressway route that literally has gaps in its means of delivery on the ground.

Thame Town Council is further concerned about the assumptions that have been made in connection with the associated Oxfordshire Growth Deal. The Oxfordshire Growth Board, for example, suggests that 5,100 homes per annum should be provided for Oxfordshire between 2016 – 2040. It has only come to this conclusion though by rolling forward the current SHMA figure from its 2031 endpoint (Oxfordshire Infrastructure Strategy, November 2017). This SHMA was out of date on its publication in 2014; it uses travel to work data from the 2001 Census, and net migration data from 2005-11. This document was and is no longer fit to be used for the purpose of strategic planning and its continuing use is harming any argument for growth.

On a similar note, the Chair and officers of Thame Town Council recently met with the Expressway stakeholder Expressway Action Group. As a stakeholder body, this group believes that the role of the southern Expressway route is being overtly promoted by the Oxfordshire Growth Board. This is an observation that is backed up by commentary from our District Councillors. The Growth Board are, of course, the owners and authors of the 2014 SHMA document mentioned above. There is considerable concern locally that their ageing evidence base, when coupled with their drive to promote economic activity in Oxfordshire, is leading them to recommend an infrastructure option that is not the best choice. The EAG, who have access to a greater evidence base than ourselves, presented a case for a northern, A34-based route to be chosen, stating the wider economy would be better served that way. Thame Town Council could see an alternative argument for a northern route can be made from the same evidence base. The Town Council itself firmly believes that the southern route would, in any case, be more likely to be used to assist in commuting to London, which is not a prime objective of the Corridor project

On the basis of the lack of suitable evidence, dissatisfaction with the appraisal strategy and recognition that many other key parties are questioning the evidence base on which the decision will be made, Thame Town Council is unable to support any proposed Expressway corridor. The corridor route is highly contentious and the evidence around each corridor option should be fully within the public domain. The decision should also be linked to a sound sustainability appraisal

process, to ensure that the corridor and its subsequent route can be simply transposed into local development plans. This is all the more important as effectively, a regional development plan is being delivered through a NSIP.

We look forward to your response.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'G. Markland'.

**Graeme Markland
Neighbourhood Plan Continuity Officer**