

Ox-Cam Forum for Strategic Environment: Expressway Corridor Consultation

Response from Campaign to Protect Rural England (CPRE)

Introduction

1. The Campaign to Protect Rural England (CPRE) welcomes the opportunity to respond to this consultation.
2. CPRE campaigns for a beautiful and living countryside. We work to protect, promote and enhance our rural towns, villages and countryside to make them better places to live, work, value and enjoy, and to ensure that the countryside is protected for both for present and future generations.
3. As a charity with some 60,000 members comprising individuals, Town/Parish Councils and other supporting organisations, and a Branch in every English county, we have long had an interest in infrastructure proposals of all kinds, whether on a local, regional or national scale. We fully engage with the planning system and other policies and initiatives at all of these levels.
4. CPRE is one of very few environmental charities for whom landscape and rural tranquillity are at the core of its values. We work for their positive enhancement as well as their protection from being despoiled.
5. In other consultation responses, particularly those to National Infrastructure Commission and so-called “England’s Economic Heartland”, CPRE has expressed its opposition to the very concept of an Oxford – Cambridge Arc and the large-scale growth that some envisage for the area.
6. Before going on to consider the Expressway Corridors in detail, we have to say that a multi-modal approach to transport between Oxford and Cambridge embracing all modes would have been the better way to proceed instead of the present separate projects in which road, rail and other modes are considered separately. Indeed, we would go further and suggest that the transport proposals should have formed part of a comprehensive statutory development plan for the Oxford–Cambridge Arc which would, of course, have been subject to full public consultation and Strategic Environmental Assessment.
7. We now understand that a ‘2050 Transport Strategy’ for the Arc is being proposed. If this is so, we question why the current consultation is taking place in advance of a proper multi-modal strategy looking at the Corridor holistically, and fully exploring more sustainable alternatives to road-building. Such a strategy should be consulted on and finalised before detailed consultation on the alignment of any new road takes place.

Consultation Questions posed to the Environmental Forum by Highways England

8. Highways England has identified three principal Corridors for consideration for an Expressway between Milton Keynes and Oxford, linking to the existing A421/A428 in the east and the A34 towards the south and west. Additionally, a number of sub-options for the potential corridor round Oxford have been identified.
9. Highways England Engagement has written out to Strategic Environment Forum members posing two questions about the choice of corridor for the proposed Expressway:
 - What is your preferred Corridor and why?
 - Are there any Corridors you do not support, and why?
10. Each of the Expressway Corridors and sub-options has different environmental impacts. CPRE is opposed to bridging the Milton Keynes – Oxford ‘gap’ in principle, for the reasons set out in Appendix 2 to this consultation response. These include *inter alia* threats to the Green Belt around Oxford, to tranquil, open and unspoilt countryside in both Oxfordshire and Buckinghamshire and to the Greensand Ridge Nature Improvement Area in Bedfordshire, as well as numerous important wildlife sites and habitats.
11. Notwithstanding this, we wish fully to engage in the consultation and discussion on the corridors and we have answered the Consultation Questions on the basis of ‘least worst’ options. We would emphasise, however, that corridor (and ultimately route) choices should not be made either on the basis of least cost alone nor on the basis of the maximum potential for built development, but on the basis of least environmental harm.
12. We feel obliged to add, though, that the *corridor* consultation should have been wider and more public than it has been. We appreciate the difficulties that this can pose, not least the public understanding of ‘corridors’ versus ‘routes’, but we feel that this is no excuse not to make the attempt. It should be borne in mind that there has been little if any *public* consultation on the whole concept of the Oxford-Cambridge Arc (the National Infrastructure Commission’s consultations were not exactly ‘public-friendly’).
13. Whilst this was not within the purview of Highways England, the Agency did have an opportunity to redress the balance in respect of the Corridor Consultation. The scale and ambition of accelerated development in a largely rural area are clearly a matter of public concern and this issue, which has so far bypassed any democratically-accountable decision-making, deserved full public consultation. CPRE continues to press for full exposure and public consultation on any proposed development of the ‘Arc’.
14. In view of our principal position on the Expressway, we do not and cannot have a ‘preferred corridor’, and so have answered the Consultation Questions on the basis of ‘least worst’ options. We have analysed each Corridor in turn and our conclusions on each one are given at the end of the respective section of this Response.
15. CPRE fully understands that this is a *corridor* and not a *route* consultation. Nevertheless, when one is looking at environmental issues the distinction is not so easily made. For example, a particular corridor may initially be seen as a ‘least worst’ option, but certain routes within that corridor may still be totally unacceptable. We feel that it is better to restrict the corridor and so to avoid the major environmental assets in the first place.
16. In order to deal with this problem, we have sought to amend the map for our ‘least-worst’ Corridor C (p. 35 of the Slides presented to the Forum on 23rd March 2018) by narrowing it in one place and to widen the published corridor area in another in order to be able to

embrace a slightly different route option. These details are provided under the section dealing with Corridor C, below.

17. One of the principal criteria in our choice of 'least worst' option is to utilise the corridors provided by the existing road network as far as possible, so as to reduce the effect on open and unspoilt countryside. Where any road improvements are considered necessary, upgrading existing roads is generally preferable to the creation of new routes across virgin countryside. For both upgraded and new roads, damage to designated areas, (e.g. Green Belt, AONBs, SSSIs, SACs, Ancient Woodland etc) should be kept to a minimum or preferably avoided altogether.
18. A further criterion is to consider the access to existing towns, better to serve existing communities and business locations, and also to encourage any growth that does take place to be directed there, where (a) brownfield opportunities can be maximised, (b) there is potential for sustainable urban extensions and (c) public transport can more easily and viably be provided, always provided of course that the designated areas listed in our previous paragraph are not thereby compromised.
19. CPRE has undertaken an objective assessment of the corridors and sub-routes against some of these parameters and these are summarised in Appendix 1 to this Response, based on the information supplied in table 5.3 of the Highways England Stage 3 Report. The table should be read in conjunction with our partially revised version of Figure 5-2.
20. We note that the revised Highways England environment intervention objectives have been updated. In our view the use of a corridor already encompassing existing, largely expressway-standard routes would be more likely to facilitate:
 - Improvement in the net environmental impact of transport on communities;
 - Reduction in the impact of new infrastructure on the natural and historic environment by design;
 - No net ecology loss. (Note: CPRE believes that the objective should be to achieve a "net gain" in biodiversity in line with the current Government 24-year environment plan).

We have utilised these criteria in our assessments of the corridors.

21. Our opposition to large-scale growth in the 'Arc' leads us to oppose the identification of corridors and any Expressway in principle for the reasons set out above and in Appendix 2 to this response. Nevertheless, we conclude that a variant of Corridor C, using the A421, A43, M40 and A34, is our 'least worst' option. See below for details of our analysis.

Corridor A (unacceptable)

22. If Corridor A is pursued, against our better judgment, it should follow the lines of the existing highway network as far as possible, e.g. A418/A4146, with new construction keeping as close as possible to existing urban areas rather than striking across open countryside. Even with this caveat, we remain concerned about opening up areas for development in open countryside between these towns.
23. However, the Corridor should not extend east of Leighton Buzzard or include the Woburn area as this would have an unacceptable impact on the Greensand Ridge and its designated Nature Improvement Area. This designation has been recognised by the local authorities both in their Local Plans and in development management, and grant funding

has been secured for ecological, educational and public access improvement in the designated area.

24. The consequence of this would be to reduce the Corridor A area south of Milton Keynes. The Corridor must run north of Aspley Guise, Aspley Heath, Woburn Sands and Bow Brickhill in order to avoid the Greensand Ridge.
25. If Corridor A is chosen, it could extend to the west of Oxford on the A34 either north of Abingdon or on the "S4" route between Didcot and Abingdon as shown in the attached Appendix 1. CPRE has significant concerns over the potential North of Abingdon route as it directly compromises a large area of picturesque highly valued unspoilt rural Green Belt including the River Thame Valley and will encourage southern expansion of the City of Oxford. Conversely, whilst still not favoured, if Corridor A were imposed, CPRE believes that the S4 option could be positioned in such a manner to minimise effect of designated landscapes including AONB and Green Belt.
26. Overall, we reject Corridor A even if the above adjustments in the corridor area were incorporated. Without these adjustments Corridor A becomes even more unacceptable.

Corridor B (rejected)

27. Corridor B is also unacceptable, because it crosses open countryside, potentially opening up areas for development in what are currently unspoilt and tranquil areas with scattered rural villages each having their own character and identity. Corridor B also serves no existing towns other than Winslow (and perhaps Bicester depending on the route chosen), and does not maximise the use of existing highway corridors.
28. Any suggestion that road and rail should share the same corridor and thus reduce environmental effects is false. The impact of East-West Rail will be minimal, as the trackbed already exists and noise, stray light and air pollution are much less than for road.
29. Whilst the corridor area shown on the map includes less of the Greensand Ridge on the Bedfordshire/Buckinghamshire border than Corridor A, nevertheless this Corridor too must be limited to north of Aspley Guise, Aspley Heath, Woburn Sands and Bow Brickhill in order to avoid the Greensand Ridge designated area.
30. Corridor B could be accessed by all S1-4 sub-options. However, CPRE strongly prefers the use of the existing S1 on-line A34 Oxford Western Bypass as opposed to all other off-line options. Whilst there are engineering challenges associated with this choice we believe that by investing in this route the current noise and air quality issues that already exist could be addressed that would otherwise persist in perpetuity.
31. We rule out any use of sub-option S2 for accessing Corridors B (or C) as it appears to traverse across the eastern edge of Otmoor with its RSPB Nature Reserve and multiple SSSI sites. In addition it is nearly all within the designated Oxfordshire Green Belt through which an additional route is completely unnecessary and avoidable in comparison with utilising the existing M40 already in close proximity. We also note that the presence of persistent fog associated with Otmoor to some extent dictated the current route of the M40 after the initial route was rejected by the independent inspector. We therefore caution against any route development within a corridor to the west of the existing M40 in this area.

32. Sub-option S3 as shown on the Highways England line diagram is not clear as to its location. If it were the existing M40, CPRE would favour this over any other off-line option if Corridor B were chosen.
33. As noted above, sub-option S4 routing between Abingdon and Didcot connecting the A34 and the M40 is considered less detrimental than any option connecting with the A34 North of Abingdon (with the caveat that on-line S1 using the A34 Oxford Western bypass is less detrimental than all other options).
34. We nevertheless reject Corridor B as detrimental and undesirable for the above reasons.

Corridor C (least worst)

35. Although Corridor C would provide good access to important towns, in this case Buckingham and Bicester, any routes in this Corridor should follow the lines of the existing highway network as far as possible, e.g. the A421, with new construction keeping as close as possible to existing urban areas rather than striking across open countryside. Even with this caveat, we remain concerned about opening up areas for development in open countryside between these towns.
36. A viable potential route [sic] which minimises both the environmental impact and the cost of new construction would follow the A421 from Milton Keynes via the outskirts of Buckingham to the A43 near the Northamptonshire border and would then follow the A43 to M40 Junc 10. This takes advantage of the existing A43 and M40 which are already almost at or above Expressway standard. We fully understand that this consultation is about *corridors* rather than *routes*, but in order to consider this option, the area as shown on the map for Corridor C should be extended north-westwards in order to include these parts of the A421 and A43 (see Fig 2).
37. Whilst the corridor area shown on the map includes less of the Greensand Ridge on the Bedfordshire/Buckinghamshire border than Corridor A, nevertheless, like Corridor B, it also must run north of Aspley Guise, Aspley Heath, Woburn Sands and Bow Brickhill in order to avoid the Greensand Ridge designated area.
38. Corridor C could theoretically be accessed by all S1-4 sub-options. However, in support of the above, CPRE would wish strongly to recommend the use of the existing sub-option S1 on-line A34 Oxford Western Bypass as opposed to all other off-line options. Whilst there are engineering challenges associated with this choice we believe that by investing in this route the current noise and air quality issues that already exist can be addressed that will otherwise persist in perpetuity.
39. As with Corridor B, we rule out any use of sub-option S2 for accessing Corridor C as it appears to traverse across the eastern edge of Otmoor with its RSPB Nature Reserve and multiple SSSI sites. In addition it is nearly all within the designated Oxfordshire Green Belt through which an additional route is completely unnecessary and avoidable in comparison with utilising the existing M40 already in close proximity. We also note that the presence of persistent fog associated with Otmoor to some extent dictated the current route of the M40 after the initial route was rejected by the independent inspector. We therefore caution against any route development within a corridor to the west of the existing M40 in this area.
40. Sub-option S3 as shown in the Highways England line diagram is not clear as to its location. If it were the existing M40 itself, CPRE would favour this over any other off-line option.

41. Using the on-line sub-option S1 along the line of the A34 Oxford Western bypass is less detrimental than all other options. That said, sub-option S4 routing between Abingdon and Didcot connecting the A34 and the M40 is considered less detrimental than any of the remaining sub-options connecting with the A34 North of Abingdon.

42. Subject to our the above, Corridor C is our 'least worst' option.

Conclusion

43. Although CPRE is opposed both to the proposed Expressway and to the 'Arc' as a potential growth area in principle, we have resorted to 'least worst' options in answering the consultation questions. However, CPRE wishes to remain fully and constructively engaged with the process in order to seek to influence to the decisions that will eventually be made. We look forward to seeing Highways England's response to consultees' comments.

Attached:

Appendix 1 – Summary table of Expressway Corridor options with comments

Figure 1 – Modified Highways England line diagram

Figure 2 – Revised Corridor C map

Appendix 2 - The case against the Expressway

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APPENDIX 2

The case against the Expressway

44. There are identifiable potential small-scale local improvements to the existing highway network which would increase safety and improve the environment for local residents and businesses. They can be implemented at much lower cost, with less disruption and with lower environmental impact than larger schemes.

45. In contrast, a major new dual carriageway across the country from south of Oxford to Milton Keynes has the following negative impacts:

Landscape intrusion

46. Most major road schemes have negative landscape impacts which can rarely be mitigated by landscaping and planting schemes. This is most marked where the route passes through open countryside.

Induced traffic

47. It is a proven fact (as well as an obvious consequence) that the provision of more roadspace attracts additional traffic. A proportion of this would be diverted from other routes (and in particular that diverted from the M25, especially heavy goods vehicles), but a significant amount of the additional traffic would be generated (a) by people making journeys that they would not otherwise have made since either distance or journey time would previously have been too long, and (b) by people making longer journeys than they would have previously, especially commuting: it would now be viable for people to live further from their place of work than previously. This is not an *advantage*, as claimed by some, but a distinct downside.

48. It should also be pointed out that history shows that induced traffic alone causes new routes and road improvements themselves to become inadequate after a time. The classic example of this is the A14 which is even now being widened from 2 to 3 lanes in each direction but much of which was a originally completely new route. In Cambridgeshire we have a bypass of a bypass of a bypass ...

Noise, light and air pollution

49. Pollution by noise, light (from both vehicles and street lighting) and emissions (e.g. CO₂, NO_x and particulates) would increase in areas not previously subject to them, both because of the existence of the new route and by reason of the additional traffic compared with the *status quo*. Because of the induced traffic effects, this would not be offset by the modest reductions in emissions resulting from less congestion on existing routes. CPRE has also campaigned for many years about the need for tranquillity in the countryside, which the Expressway proposals would destroy, just as motorways and other trunk roads have done.

Opening up virgin countryside for development

50. One of the most serious potential effects of the Expressway would be to open up virgin countryside for development, whether this be new towns, other settlements or commercial/ industrial activity. New and improved roads always attract built development which itself can blight the countryside and have its own landscape and light pollution effects. This is not to deny the need for any new development, but that should be modest

in scale, re-use brownfield land as much as possible and be concentrated in or adjacent to existing towns where public transport, public services, employment, education, healthcare and retail already exist and can be readily accessed at short distances.

Potential community severance

51. Depending on the final route(s) chosen, new roads can sever communities, farms and the rights-of-way network, and impede access to the countryside from local settlements.

Reduced viability of public transport

52. All new and improved roads increase the attraction of the private car and road-based freight, and this in turn reduces the viability of public transport. The business case even for EWR, which has both official and popular support, would be undermined by the Expressway. (This will become particularly evident in the case of EWR Central Section – Bedford to Cambridge – which is at a far earlier planning stage but where the proposed parallel A428 improvement is more advanced.)

53. As previously mentioned, a multi-modal approach to transport between Oxford and Cambridge embracing all modes is the better way to proceed instead of the present 'silo' approach in which road, rail and other modes are considered separately. This would have examined the impacts of enhancing one particular mode on each of the others and would have more clearly demonstrated the interactions between them and the need for better integration between modes.

54. Taken together, all these remarks lead CPRE to oppose the Expressway in principle. We would, however, constructively engage in discussions in respect of local safety and environmental improvements on the existing network.

CPRE

11th April 2018