# The Oxfordshire County Council (A40 Access to Witney) Compulsory Purchase Order 2023

The Oxfordshire County Council (Highways Infrastructure – A40 Access to Witney) Side Roads Order 2023

PLANNING INSPECTORATE REFERENCE:

DPI/U3100/23/25

Summary Proof of evidence of

**Nicholas William Blades** 

(Strategic Case and Need)

#### 1 INTRODUCTION AND QUALIFICATIONS

1.1 I am Nicholas William Blades. I have 30 years' experience in transport planning and policy. I have worked for Transport for London and number of Local Authorities in England. I am currently a Principal Infrastructure Planner at Oxfordshire County Council providing transport and infrastructure planning advice on the Access to Witney Scheme (the Scheme).

#### Scope of Evidence

- 1.2 This summary proof of evidence has been prepared regarding the background context, need and justification for the Scheme and the Orders. I also consider the regard the Council has given to its human rights and equalities duties and address the grounds of objection raised by statutory and non-statutory objectors insofar as they relate to my area of expertise.
- 1.3 The Orders relate to the delivery of improvements to the existing junction of the A40 Principal Road, the B4022 and the C16886 South Leigh Road at its junction with the B4022, at Shores Green, Witney at the location of the junction of the A40 with the B4022. The Scheme is known as the A40 Access to Witney Scheme.
- 1.4 I confirm that the evidence that I have prepared in respect of this Inquiry is given in accordance with the Code of Professional Conduct of the Transport Planning Society, of which I am a member. I can confirm that the opinions expressed are my true and professional opinions.
- 1.5 My summary proof of evidence should be read in conjunction with my full proof of evidence and other separate but interrelated proofs of evidence submitted on behalf of the Council: Philippe Nirmalendran; Bal Tiwana; Theo Genis; Alison Morrissy; Gareth Slocombe; Jessica Bere.

# 2 LOCATION OF THE SCHEME AND ORDER LAND

2.1 The Scheme is located to the South-East of Witney at the existing junction of the A40 principal road, the B4022 and the C16886 South Leigh Road at a location known as Shores Green, Witney.

# 3 THE NEED FOR THE SCHEME

#### Need for the Scheme

3.1 A range of existing and future transport, environmental, economic and housing delivery challenges have led to the need for transport infrastructure investment in the Witney area and specifically for the delivery of this Scheme and the Orders. The existing road network configuration in Witney, and specifically the limited river crossings and the restricted access to and from the A40 at the A40/B4022 Shores Green junction, means that local and longer distance vehicular traffic currently needs to route through Witney Town Centre. This results in high volumes of traffic throughout the day, traffic delays for road users, an unattractive environment for pedestrians and cyclists and a range of negative environmental impacts in the town centre and particularly on the B4095, Bridge Street, which has been designated an Air Quality Management Area.

- 3.2 The provision of new housing is recognised as a critically important issue for West Oxfordshire and vital to local economic growth. Witney has been identified as a key focus area for new housing in the West Oxfordshire Local Plan. The adopted West Oxfordshire Local Plan 2031 emphasises that housing growth in Witney needs to be supported by appropriate and timely investment in enhanced highway infrastructure and other transport measures. This is required to help mitigate the impact of development traffic on the town's road network and also to promote more sustainable and active travel in Witney.
- 3.3 To support Witney's future growth and to help address the traffic and air quality problems in the town centre both the adopted West Oxfordshire Local Plan 2031 and the Council's 2015 Local Transport Plan 4 Area Plan for Witney identified a need for range of strategic highway improvements and other transport measures in the Witney area, including specifically a scheme to improve access to the A40 Principal Road at the A40 / B4022 Shores Green junction.

#### Alternative Options, Stakeholder Engagement and Public Consultation

- 3.4 The Council has completed a thorough, proportionate and inclusive assessment of potential options based around Department for Transport (DfT), Transport Analysis Guidance to select the preferred Scheme and to ensure the Scheme addresses the challenges the area faces, meets a series of appropriate Scheme objectives, meets local and wider policy ambitions and takes no more land than is necessary.
- 3.5 Throughout the evolution of the Scheme to date, there has been wide and extensive consultation with stakeholders, landowners and the public. The Council has been responsive to feedback and information it has gathered during its engagement and public consultation, which has shaped and informed the Scheme design currently proposed. The majority of those who provided feedback during the public consultation supported the preferred Scheme. West Oxfordshire District Council and Witney Town Council have provided strong support for the Scheme.

# 4 DESCRIPTION OF THE SCHEME

4.1 The Scheme will construct two new west-facing slip roads at the junction of the A40 Principal Road and the B4022 ("Shores Green junction"); a new eastbound exit slip road from the A40 to a new junction with the B4022; and a new westbound entry slip road onto the A40 from a new junction with the B4022. The Scheme will maintain existing connections for pedestrians in the area and also provide new walking and cycling facilities on the B4022 and alongside the A40.

# 5 SCHEME OBJECTIVES AND BENEFITS

- 5.1 The main objectives of the Scheme are to improve access to the A40 from east and north-east Witney; to reduce congestion and improve air quality in Witney Town Centre and to support planned housing growth in Witney.
- 5.2 The Scheme's transport and environmental benefits and impacts have been robustly and proportionately assessed and reported in the Transport Assessment and the Environmental Statement which were prepared in support of the Scheme's planning

application (R3.039/22) submitted in March 2022. The main findings of those assessments have been provided in Section 6 of the Statement of Case [CD A.6] and Section 5 of my Proof.

- 5.3 The transport modelling and environmental assessments forecast that the Scheme will deliver outcomes and benefits that meet the Scheme's objectives and in particular it will:
  - Improve access to the A40 from east and north-east Witney and reduce the need for local and longer distance traffic to travel through the town centre by providing an attractive alternative traffic route around the edge of the town via the B4022 and A40.
  - Reduce traffic volumes within the town centre, including on A4095 Bridge Street and improve journey times for traffic on multiple routes across the town. Reduced traffic volumes and delays will improve air quality within the Bridge Street AQMA, help support economic vitality in the town centre and improve public health. It will also improve the operational resilience of the highway network and enable the Council to implement schemes that form part of its area transport strategy to manage and deter through traffic in the Town Centre and promote use of sustainable and active travel and improve the environment, road safety and the streetscape in Witney's historic core.
  - Improve traffic conditions and reduce delays to journey times thereby rendering the highway network more capable of supporting the delivery of new housing in Witney (including at the EWSDA), which is vital to economic growth, as set out in the West Oxfordshire Local Plan 2031.
  - Provide better and safer walking and cycling connections and conditions through the local area improving connections between South Leigh, High Cogges, Cogges and Witney, improving connectivity to local bus stops, as well as enabling linkages with development proposed at the EWSDA. This will support more walking and cycling in the area, reducing car use, improving public health and wellbeing, and reducing emissions of harmful pollutants.

# 6 HUMAN RIGHTS AND EQUALITIES DUTIES

6.1 In pursuing the Orders, the Council has carefully considered the balance to be struck between the effect of acquisition on individual rights and the wider public interest in the Scheme construction. Interference with human rights is considered by the Council to be justified in order to secure the economic, environmental and public benefits which the Scheme will bring. The Council has also had due regard to its public sector equality duties in assessing options and developing the Scheme design.

# 7 OBJECTIONS TO THE ORDERS

7.1 The reasons for objection described in Section 6 do not justify the refusal of the scheme. There is a compelling case for the Orders to secure the outstanding interests required to enable the timely implementation of the Scheme and to achieve the Council's objectives for the area. I am satisfied that the Council is acting legally and there is no misuse of statutory powers in promoting the Scheme or the Orders.

# 8 CONCLUSIONS AND JUSTIFICATION FOR THE USE OF CPO POWERS

8.1 Overall, the Scheme will provide wide ranging transport, economic, environmental and health benefits to the public that outweigh the limited local adverse environmental effects the Scheme will have on landscape and noise and justify the acquisition of individuals' land interests using compulsory purchase powers.

#### 9 STATEMENT OF TRUTH AND DECLARATION

9.1 My statement of truth is contained in full within section 8 of my proof of evidence. I can confirm that the contents of that section apply equally to my summary proof of evidence.

#### NICHOLAS WILLIAM BLADES

19 February 2024