

The Rt Hon Chris Grayling MP
House of Commons
London
SW1A 0AA

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Dear Chris Grayling,

I am writing to enquire as to why a Strategic Environmental Assessment (SEA) is not being carried out for the proposed plans for the Oxford to Cambridge Expressway.

The intention, as we understand it, is for an Environmental Impact Assessment to be completed prior to deciding on the final, detailed route after the primary corridor has been chosen. However, we would like to understand why there has not been an environmental assessment made public on these route options, alongside the economic and societal analysis published, and why the selection of the corridors for the route is not being informed by a public consultation. The choice of the routes has far reaching environmental impacts for the region as this is a major strategic piece of infrastructure. Without properly considering these impacts on the route options the correct decision may not be made in line with guidelines around sustainable development.

We are being consulted through Jacobs via the Strategic Study Stakeholder Reference Group, but this is not following a formal public consultation process and is not in line with the SEA Directive (Directive 2001/42/EC). We believe that this Directive instructs that a proposal of this size, which crosses multiple local authorities, and is likely to have significant effects on the environment, should be brought forward within a plan or framework that has been subject to a systematic environmental assessment.

The plan for the Oxford to Cambridge Expressway is clear; there are destinations and potential route options, with associated significant impacts arising including where one million houses will be placed in the coming decades. Our interpretation is that the Expressway is a 'plan' for the purposes of the SEA Directive, and as it has significant effects on the environment; these should be considered during the preparation of the plan.

Please can you provide us with the DfT interpretation of the SEA Directive for the purposes of deciding the route options.

We would also like to understand why the DfT only intends to carry out a Habitats Regulations Assessment (HRA) once the broad corridor route has been chosen. Article 6 (3) of the Habitats Directive outlines that an assessment is required on plans and projects. We would expect a plan level HRA to be undertaken at this stage. It is our interpretation that the Habitats Directive (Directive 92/43/EEC) instructs that alternatives should be considered if there are considerable impacts on designated sites. With the Oxford Meadows Special

Area of Conservation (SAC) and Cothill Fen SAC lying within the broad route options it seems HRA should be essential to the process of selecting routes.

We engaged the government on the use of an SEA when DfT was selecting routes for the HS2 railway. The Wildlife Trust was party to a legal challenge to the Supreme Court, which refused to intervene. With the community action group HS2AA, we complained to the European Commission. Although the case was closed, the Commission stated:

'We remain of the view that large transport infrastructure developments such as this should be best addressed, in particular with regard to the question of alternatives, through the process foreseen in the SEA Directive (a matter which we will continue to raise with the UK authorities.)'

We would like to understand how DfT interprets the Commission's advice in regard to the use of an SEA for the Oxford to Cambridge Expressway.

We would appreciate a prompt response in regard to this letter as we understand the broad corridor for the Expressway will be selected by July this year.

Yours sincerely,



Estelle Bailey
Chief Executive
Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust

Please note that this enquiry has also been sent to Phillip Andrews, Head of Future Roads Strategy and Investment, at the Department for Transport