

The Oxford to Cambridge Expressway Team

By email only

12 April 2018

Dear Sir or Madam,

**Re: Oxford to Cambridge Expressway – consultation on corridor options**

Thank you for asking the RSPB for our comments on the Expressway corridor options between Oxford and Milton Keynes.

As a nature conservation charity the RSPB's comments must focus on issues affecting nature, but we fully appreciate the concerns local communities will also have about other potential impacts of the Expressway on their lives – after all, many of our staff, volunteers and supporters are members of these communities too.

The RSPB manages almost 400 hectares of wetlands at Otmoor nature reserve, and we work in partnership at a landscape scale with many farmers and organisations throughout the area affected – notably, the two Wildlife Trusts covering the affected counties of Oxfordshire, Buckinghamshire and Bedfordshire, with “Wild Oxfordshire” and with the Greensand Ridge Nature Improvement Area (NIA).

This letter summarises the major points of our response. Further detail and evidence is provided in the accompanying annexes. This must be treated as a “without prejudice” response: the corridors are very broad, we do not have access to all biological data for the whole area, and we have had to make some assumptions about possible routes within the corridors. **So, if new information emerges we reserve the right to review our position on any corridor option.**

**Main points:**

- 1) We are concerned at the intention to choose a preferred Expressway corridor without proper public consultation, and without proper consideration of the full scale of impacts likely to arise from not just the road, but also the urban growth likely to follow it. We therefore call on the Government, the NIC and Highways England to undertake proper public consultation on the corridor options, and a full Strategic Environmental Assessment (SEA) for all the proposed corridors now, before the options for a specific route begin to be narrowed down.**
- 2) The RSPB places the highest importance on the continued protection and enhancement of the protected sites network. The choice of preferred corridor should treat potential direct and indirect impacts of the Expressway (and follow-on urban growth) on protected sites and ecological connectivity between them as a very significant constraint, especially – in the context of these corridors – internationally important Special Areas of Conservation (SACs) and nationally important Sites**

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of Special Scientific Interest (SSSIs). This includes protecting and enhancing ecological connectivity between such sites – a particular challenge posed by major road schemes.

- 3) **This is not just about a new road: statements from the Government and National Infrastructure Commission (NIC) suggest the preferred route is likely to be the focus for major new urban growth.** We have taken this into consideration, and we believe Highways England should do the same in selecting a preferred corridor, working with the Government and NIC to understand the full implications before making this choice.
- 4) **The area covered by the Expressway corridors is rich in nature, but not uniformly so. On a large scale, there are two particular landscape-scale areas we think the preferred corridor should completely avoid because of their relative abundance of protected sites and important habitats for nature, and because of the presence of a few species of the highest national priority and restricted range.** These two areas are:
  - In the west: an area from south-west of Oxford around Cothill Fen running north-east through Otmoor, the Upper Ray Valley and Bernwood Forest, to Calvert Jubilee. It includes the Thame Valley and parts of the Cherwell Valley.
  - In the east: the Greensand Ridge between Leighton Buzzard and the M1.
- 5) **Taking these areas into account, the RSPB believes a route in corridor B plus either sub-corridor S1 or S2 would have the worst impact on important homes for nature including Calvert Jubilee nature reserve, woodland SSSIs in Bernwood Forest, wetlands and lowland meadows in the Upper Ray, and (depending on the sub-option chosen), either the two internationally important SACs west of Oxford, or the nationally important wetlands of Otmoor RSPB reserve.**
- 6) **In particular, an Expressway in corridor S2 crossing the Upper Ray and any part of the Otmoor basin would, in our opinion, be a disastrous outcome for nature.** If this became the preferred route we would like you to understand that the RSPB will fight it at every possible step, to defend the nationally important wildlife of Otmoor, the amenity of thousands of visitors, and the nature-rich landscape that surrounds it. It is already clear to us that numerous local people and community groups identify strongly with this position. We are simply not prepared to see the victory that local people gained over the M40 routing in the 1980s undone by this new proposal.
- 7) **Curlews (a breeding wading bird of lowland meadows), Bechstein's bats and black hairstreak butterflies all breed in restricted parts of Oxfordshire and Buckinghamshire.** We highlight these three species in particular (out of a potential list of thousands in the corridors) because of their national and local importance, protected status, and restricted distributions within the corridors. Their presence adds great weight to the case to avoid Corridors B and C, and S2 in particular. We strongly recommend that Highways England seek input from other nature conservation charities with specialist expertise in some of these species, notably the Bat Conservation Trust and Butterfly Conservation as well as the Wildlife Trusts.
- 8) **An Expressway in corridor S1 is likely to cause significant damage to two internationally important Special Areas of Conservation (SACs)** classified under the European Habitats Directive. A route following the existing line of the A34 across the Thames is very likely to cause additional damage (e.g. from air pollution) to Oxford Meadows SAC to that already arising from the A34, and if a route from Botley to Abingdon passed west of Wootton (rather than continuing south on the A34) severe direct and indirect damage to Cothill Fen SAC would probably be inevitable. The RSPB is strongly opposed to corridor S1 for these reasons, especially if considered in conjunction with main corridor option B.
- 9) **While we consider that any route in corridor B with S1 or S2 would pose the most serious threat to nature, the RSPB has concerns about all of the corridors, since they would all potentially have significant impacts on nature at a local level. Therefore, rather than identifying a “preferred”**

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**corridor, we feel it is only possible to identify a corridor that poses least risk to the highest value sites, habitats and species. This is a southerly corridor comprising a mix of options B and A described as follows:**

Such a corridor would run west from the M1 towards Bletchley but stay north of the Greensand Ridge, then follow the A4146 south past Stoke Hammond to follow corridor A west to the A34. The corridor should stay out of the Thame Valley, an important floodplain landscape with breeding curlews. Such a corridor would offer the potential for a preferred route (and follow-on urban growth) that largely avoids the two landscape-scale clusters of important sites, habitats and species discussed above.

- 10) Nonetheless, any route will have local impacts on nature, so we will expect to see a clear and realistic plan for mitigation and compensation that follows the “mitigation hierarchy” laid down in the National Planning Policy Framework. We also believe Highways England should set out a clear objective that this project will seek to achieve a net gain for nature – not simply “no net loss” as at present.** So overall, the approach must be that harm to nature must first be avoided as far as possible; mitigation for unavoidable harm must be provided; and where residual effects still exist, compensation must be provided. Finally, every effort to enhance biodiversity must be made. These steps are distinct and the order to be followed is crucially important.
- 11) Last but not least, even though the principle of building an Expressway is outside the scope of the current consultation we have very serious concerns on climate change grounds about the wisdom of building yet another major road.**

The enclosed annex adds detail to many of the above points, with data and maps where appropriate.

In closing, we would be pleased to meet representatives of Highways England in person to view parts of Otmoor, the Upper Ray Valley and the Thame Valley at your convenience, and to discuss our comments with you at any time prior to a decision about a preferred corridor. Equally, any further information we can provide (subject to data sharing agreements) that will help inform your decision will be sent at the earliest opportunity.

Yours sincerely,



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