



Sutton Courtenay Parish Council

To

The Secretary of State for Transport
National Transport Casework Team
Tyneside House
Skinnerburn Road
Newcastle Business Park
Newcastle upon Tyne
NE4 7AR

Tuesday 7th March 2023

SUTTON COURTENAY PARISH COUNCIL RESPONSE TO HIF1 BRIDGE & SRO

**THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT TO CULHAM THAMES BRIDGE) SCHEME 2022
("THE BRIDGE SCHEME")**

**THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT GARDEN TOWN HIGHWAYS INFRASTRUCTURE –
A4130 IMPROVEMENT (MILTON GATE TO COLLETT ROUNDABOUT), A4197 DIDCOT TO CULHAM
LINK ROAD, AND A415 CLIFTON HAMPDEN BYPASS) (SIDES ROADS) ORDER 2022 ("THE SIDES
ROAD ORDER")**

Sutton Courtenay Parish Council (SCPC) has objected strongly to the current HIF1 Planning Application (OCC Ref R3.0138/21) on the detailed grounds in the attached letter. From these and other objections it is clear that despite that the OCC claims (para 5.2 of the Order) that the scheme meets all the objectives at Table 2, it in fact fails to meet:

- Objectives 3 and 4 that the impact of the additional housing and increased employment on the transport network is acceptable and that the impacts on the transport network are adequately mitigated.
- Objective 6 with its requirement for future proofing.
- Objective 7 to minimise the need to travel and where it is necessary promote sustainable modes of transport.
- Objective 8 to minimise carbon emissions and noise impacts.
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Site 12. Of particular concern to SCPC has been the belated addition of a junction on the B4016 (Sutton Courtenay to Appleford Road stretch) included in the Side Road Order Site 12. For over five years SCPC has sought assurance from OCC that the addition of this junction would reduce traffic through the village rather than attracting more through traffic to access the HIF1 scheme at Site 12. Despite frequent requests for the data underpinning the requirement, neither the above assurance nor access to that data has been received.

Moreover, it is clear from a detailed analysis of the available data that no allowance has been made for the 'induced traffic' the HIF1 scheme would attract. Although OCC does admit that even without including the 'induced traffic' factor, the congestion through the village would return to



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the current unacceptable levels within 8 to 10 years. Experts adding the 'induced traffic' factor into the equation, indicate that congestion would return to the current levels, much sooner and possibly even within 2 years, thus negating the primary rationale for the HIF1 Scheme of reducing congestion and mitigating the impact of the additional housing and employment opportunities in Objectives 3 and 4.

For that reason, SCPC urges the Secretary of State to reject the HIF1 Bridge Scheme and Side Roads Order at Site 12.

Site 4. SCPC also has grave concerns about the Science Bridge plan at Site 4. The elevation of this bridge is at extreme levels in order to cross both the railway and the adjacent 'Sutton Courtenay to Didcot' Road to the north of the railway. The design of the access to the south and the flyover over the B4130 exacerbate the difficulties of constructing the bridge and the traffic situation will be further aggravated by the single-lane arrangement necessitated by the elevation.

Site 13. The design of the new River Thames Bridge and the flyover requirements over the current gravel extraction pits within SCPC's parish boundary will have an adverse impact on the landscape of the area as well as posing considerable engineering and financial challenges. It is suggested that the Secretary of State reviews these arrangements very carefully and considers whether they can be delivered given the financial constraints and inflationary pressures.

Value Engineering. SCPC is also concerned at Oxfordshire County Council's decision to seek to control the budget through 'Value Engineering' not just post the Secretary of State approval of the Bridge and Side Roads Order, but also after its own Planning Committee consideration of the HIF application itself. SCPC does not consider this to be an acceptable practice, especially as it would adversely affect the already limited 'sustainable transport' provision of cycleways and footpaths and the other mitigation measures that the local parishes are seeking.

Review of the HIF Scheme. Finally given the congestion, pollution and landscape issues surrounding the HIF1 scheme, its failure to meet many of its stated objectives and doubts over whether it can be delivered within the finance available, SCPC also recommends that the Secretary of State orders an immediate review of the whole HIF1 scheme.

Encl: SCPS's response to Oxfordshire County Council objection to application R3.0138/21

SUTTON COURTENAY PARISH COUNCIL'S RESPONSE TO APPLICATION R3.0138/21

Comment on the Notice of Submission of Further Information in relation to Application for Planning Permission Accompanied by an Environmental Statement (Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 as Amended)

Sutton Courtenay Parish Council (SCPC) is also represented in the submission¹ by the Neighbouring Parish Councils' Joint Committee (NPC-JC)² which has been produced by its consultant Mr Hopkins. This response seeks to reinforce aspects of that submission with particular reference to SCPC's concerns.

Inadequate Consultation

There is a long history of Oxfordshire County Council's (OCC) consultation with Sutton Courtenay Parish Council (SCPC) on the HIF1 project. To date key questions asked by SCPC have not received substantive responses.

A presentation was made to SCPC in July 2019 by Oxfordshire County Council's Principal Infrastructure Planner. Subsequently, we welcomed the offer by OCC's HIF1 Transport Planning Team, in July 2020, to hold more detailed discussions. We feel extremely frustrated by the lack of substantive responses to queries raised by Sutton Courtenay Parish Council since 2019. This frustration has been heightened by the failure to address our issues in the additional information provided by OCC and its consultant pursuant to the Regulation 25 request.

We appreciate that it is important that local planning authorities identify and consider all relevant planning issues associated with a proposed development. Consultation is a requirement and part of the planning process. However, in this case the consultation feels like a box-ticking exercise. It ignores the fact that consultees may be able to offer particular insights or detailed information which is relevant to the consideration of the application and hence issues raised should be meaningfully addressed. In essence, therefore, SCPC does not feel that its concerns/comments/questions have been adequately addressed during the consultation process, including in the Regulation 25 Response.

Traffic Modelling

A key issue for Sutton Courtenay, raised repeatedly over the last five years, remains a lack of modelling data in the public domain with no sight of validated traffic modelling assessments, that clearly demonstrate that having a junction between the B4016 (Appleford Road) with the proposed 'Didcot to Culham' Road, will reduce or indeed increase, the traffic impact through Sutton Courtenay.

¹ NPC-Joint Committee - Further objection 20.1.23 emailed to Emily Catcheside by Gregory O'Broin on 20/11/2023 at 2:10 PM

² Neighbouring Parish Council Joint Committee (NPC-JC) which represents five Parish Councils along the route, namely Appleford, Sutton Courtenay, Culham, Burcot and Cliffron Hampden and Nuneham Courtenay.

Despite repeating this in Query B in the Regulation 25 request, it remains unanswered. Instead, the Regulation 25 response merely repeats the data originally provided in the application and makes no allowance for the induced traffic that this junction and the scheme as a whole will attract.

The Regulation 25 Traffic Assessment response is also notable for the number of times AECOM (on behalf of OCC) seeks refuge in an 'out of scope' response to our queries.

We are told that the scheme aims to 'future-proof the local infrastructure' provision and reduce congestion around, and through, the villages, whilst providing value for money. SCPC has been seeking clarification around many issues, including the efficacy of the transport data underpinning the scheme for several years. However, to date the evidence provided, has failed to demonstrate:

- that traffic (both through and local) in Sutton Courtenay and Appleford will be eased by the HIF1 improvements.
- the resilience and robustness of the proposed new road network against gridlock in Sutton Courtenay due to untoward traffic incidents and future (planned and unplanned) growth. Traffic incidents are not unknown on the A34 around the Harwell to Milton Interchange to Abingdon sections and result in grid lock of Sutton Courtenay. The inclusion of a junction on the B4016 will most certainly exacerbate the grid lock through Sutton Courtenay during A34 accident conditions. No test of reassignment has been conducted.
- that the proposed junction on the Appleford Road (B4016) will ease traffic flow through Sutton Courtenay even with the cumulative impact of 15,500 new homes (3,300 already built), that the HIF1 is supposed to support.

Despite frequent requests, OCC has ignored SCPC's recommendations on traffic mitigation measures, including: derating of the B4016 through Sutton Courtenay; termination of the Hanson and FCC routing agreements and traffic calming through the village. OCC has stated that traffic mitigation measures through the village are 'out of scope' of the current HF1 proposals.

The application fails also to demonstrate that increasing the road network connectivity, including the junction, will **not** result in Induced Traffic Demand (ITD) and "create" further congestion or create a rat run through Sutton Courtenay under anomalous conditions.

Alarming, the application acknowledges the congestion will return to current levels in eight to ten years. However, estimates, which include 'Induced Traffic', indicate that it could be as short as two years. Either timeframe raises questions over the scheme's benefits and value for money and whether the funds could not be better used with a more modern approach to sustainable traffic, which could be more effective in meeting the HIF1 aim of 'future proofing local infrastructure provision'. All that is not to mention the upheaval the construction of the current scheme will involve.

It should also be noted that the HIF1 road is an arterial development from the A34 to the B4025 close to Nuneham Courtenay and a few miles from M40. It will, therefore, bring significant commercial traffic to the area.

In addition to the above, we are concerned with the lack of comparative assessment of alternative options. Most have been arbitrarily dismissed with no proper assessment of alternatives carried out.

Conflict with Policies and other Issues

As NPC-JC's comprehensive response³ has been fully endorsed by Sutton Courtenay Parish Council, for the sake of brevity, we do not repeat the details here but note that the planning application conflicts with a significant number of planning and internal policies and despite the additional Regulation 25 information still remains deficient in that regard. In particular:

- Part-2 of OCC's newly adopted Local Transport and Connectivity Plan (LTCP), contrary to the guidance set out in para 49 of the NPPF.
- Legally binding national targets for significant reductions in carbon emissions and carbon neutrality.
- Financial constraints may compromise Didcot Garden Town's emerging Local Cycling and Walking Infrastructure Plan (LCWIP) as the design is pruned to meet budgetary constraints.

Other points of note are:

No Health Impact Assessment (HIA) has been submitted, despite the specific policy requirements of LTCP Policy 9.

Although a Climate Change Position Statement has now been submitted it fails to meet the requirements of LTCP Policy 27.

The HIF 1 scheme fails to comply with the Department for Transport's Transport Analysis Guidance (WebTAG) in its assessment of alternatives to a new road.

Air Quality – SCPC consider the claim of benign impact of the HIF1 road on local communities is unrealistic and has not been demonstrated. Levels of NO₂, PM₁₀, PM 2.5 in the Environmental Statement are based on computer predicted values and no evidence is provided that the values reflect the expected local distribution of pollutants for local communities. The area borders an active landfill and gravel works, with specific environmental conditions which have not been assessed.

The Noise Assessment has been arbitrary with no measurement of traffic noise on the Drayton Road in Sutton Courtenay. This a busy road with heavy volumes of traffic and failure to measure noise impact is a major omission.

³ NPC-Joint Committee - Further objection 20.1.23 emailed to Emily Catcheside by Gregory O'Broin on 20/11/2023 at 2:10 PM

Financial Viability

Post-Covid, the original HIF1 budget is acknowledged to be a considerable underestimation and potentially any further costs largely falling on local taxpayers, which raises very serious doubts on whether the project can be delivered, particularly given current levels of inflation. Whether a scheme is viable and deliverable within the given budget is a material planning consideration and should lead to this project being withdrawn.

The County Council is already alert to this and concerned about the associated risks to its finances. However, it hopes to prevent escalating costs by reviewing the scheme and applying 'value engineering', which is likely to reduce support for more sustainable transport provisions such as cycleways, walkways and links to footpaths. The demand for increased funding is also likely to mean that only part of the scheme would be completed. Given that Sections B (Science Bridge), C (Didcot to Culham) & D (Clifton Hamden bypass) are interrelated, the objectives claimed cannot be achieved.

Summary

It is clear that the proposed scheme is unaffordable (poor value for money for an A road that will cost £33m per mile or £64m per mile for Section C) and fails to meet its basic aims of reducing congestion and future proofing the local infrastructure provision. SCPC therefore urges OCC to withdraw the current application and adopt a more modern approach to sustainable traffic, which would be more effective in meeting the HIF1 aims.

Finally, the Parish Council contends strongly, that any modifications, including belated attempts at 'value engineering' to a major planning application such as this, must be treated as a new application and the consultation process started afresh. It also reserves the right to comment further should more documents be submitted by the applicant before the planning committee consideration.