

STATEMENT OF OBJECTION (R3.0138/21) ON THE BASIS OF HEALTH AND WELLBEING

Planning Application R3.0138/21, HIF1 road between A34 Milton Interchange and B4015 north of Clifton Hampden.

THIS STATEMENT OF OBJECTION IS BASED ON A REVIEW OF THE ENVIRONMENTAL STATEMENT: VOLUME 1 CHAPTER 13, POPULATION AND HUMAN HEALTH, accompanying the application.

1.0 Basis for Refusal

The application for the development of the HIF1 road should be refused planning permission for the following reasons.

The proposal fails to comply with the following policies within Local and County Plans:

1.1 South Oxfordshire District Council

1.1.1 SO District Council Local Plan Policy EN12 which states that *“the merits of development proposals will be balanced against the adverse impact on human health the natural environment and/or local amenity from factors (such as) noise and vibration, smell, dust, odours artificial light... air Pollution.”*

The Environmental Statement for the road fails to adequately investigate and present the impact of noise, air pollution on local communities living close to the proposed path of the road. The communities of Appleford, Sutton Courtenay, Culham, Clifton Hampden, and Nuneham Courtenay will be particularly impacted by increased traffic, noise and pollution generated by the proposal. Local factors in relation to cumulative noise and pollution in these communities have been ignored in the Environmental Statements.

1.1.2 The South Oxfordshire District Corporate plan 2020-2024 recognises the Climate Emergency and pledges to support a district target of net zero carbon by 2030 and to *“take positive action on air quality improvement measures and sustainable transport”* and commit to *“Active travel including walking public transport and cycling infrastructure to reduce car dependency and air pollution.”* The proposal to develop the HIF1 road fails to meet the objectives of this corporate plan as it will:

- Contribute to increased carbon emissions, both embodied in the construction and by facilitating increase in vehicle journeys in south Oxfordshire, making the 2030 zero carbon target less reachable.
- Fails to prioritise sustainable transport modes (a modal shift). Fails to actively discourage car dependency by failing to providing infrastructure exclusively for zero emission public vehicles and active travel modes.
- Fails to prioritise development of existing rail services between Didcot, Oxford and beyond including the commuter link to Culham Science Centre

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1.2 Vale of White Horse District Council Local Plan 2031 part2

Core policy 16b refers to the Didcot Garden Town masterplan which aim to “*reduce reliance on motorised vehicles and promote a step change towards active and public transport*”. The HIF1 road proposal, ultimately providing a dual carriageway arterial link between the A34 and east Oxford/ M40 will increase reliance on vehicle use for both commuting and freight handling. It does not provide a step change to give exclusive access for active travel, zero carbon modes and public transit systems. It fails to integrate the existing rail connection between Didcot Oxford and intermediate stations. For these reasons the HIF1 scheme fails to meet the objectives of Core policy 16b.

1.3 Oxford Health and Wellbeing board

The Oxfordshire Health and Wellbeing Strategy 2018-2023 (2019) seeks to promote community health and wellbeing, by encouraging active travel and protection from the impact of poor air quality (amongst other factors) on health. The development of the HIF1 by facilitating more vehicle use is counter to the health and wellbeing objectives of Oxfordshire.

In particular elevating the HIF1 road over the rail sidings at Appleford will increase the distribution of road emissions downwind over the dwellings in Appleford.

2.0 Environmental Statement Chapter 13, Population and Human Health

The effects of the road on public health issues is reported in **the Environmental Statement , Chapter 13 “Population and Human Health”**. All following references to Sections refer to this document.

- 2.1 This document follows the assessment procedure of the Design Manual for Roads and Bridges (DMRB) sections LA 104 environment and LA112 Human health. It fails to acknowledge and follow the guidance of a Health Impact Assessment as stated as a requirement in the OCC policy document LTCP 2021.
- 2.2 As Sections 13.4.7 to 13.4.14 make clear this document was not developed in consultation with all the Parish Councils from Didcot, and Abingdon through to Nuneham Courtenay that would be affected by the proposals. It is clear that this Statement has been written with little direct information or understanding of local issues within the communities close to and affected by the road proposal. The following comments exemplify this.
- 2.3 With reference to table 13.3, the Environmental Statement fail to meet the requirements of the Scoping opinion in particular “*The health and socio-economic impacts on residents. Adjoining the scheme... including Sutton Courtenay, Appleford Culham and Clifton Hampden, this includes the impact of the development proposed on the Appleford Sidings including the proposed crossing of the railway line.*” The HIF1 planning application cannot be given consent while the impact on these communities is so poorly understood.

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2.4. Section 13.7.6 lists existing businesses “commercial receptors” that could be affected by the road proposal. This list is incomplete and fails to acknowledge access restrictions that the HIF1 road may bring to:

- Businesses at Manor Farm Appleford
- Shops, filling station, public houses, primary school ,music school, Church and businesses at the Nursery, Sutton Courtenay
- Public house and BB businesses at Burcot and Clifton Hampden

2.5 Section 13.7.32 makes the statement “*The two BOAT (Byway open to all traffic) in the study area connect Sutton Courtenay to a byway with restricted traffic, which leads to but terminates before the Appleford Level Crossing.*” The Termination of the BOAT at Appleford Level Crossing is disputed. There is no evidence that the existing byway continuing onto the B4016 was ever truncated by the intersection of the railway line.

Section 13.10.38 describes the impact of the HIF1 road on Public Right of Ways in the area of Appleford Level Crossings. This section omits to include the large adverse effect of the HIF1 road on the BOAT/PRoW number 4 crossing Appleford level crossing to join with the B4016 Appleford Road. This route is an Historic and continuous byway known as the Old Wallingford Way. It provides a direct connection between Appleford and Sutton Courtenay and will be adversely compromised by the alignment of the proposed HIF1 road. Section 13.10.46 fails to recognise the permanent dislocation and potential closure of this BOAT due to the alignment of the HIF1 road.

2.6. Section 13.10.5 examines the effect of the road on Appleford community assets. This fails to include the permanent disruption to the following journeys:

- from Abingdon and Sutton Courtenay direction to access Appleford Recreation ground, playground, football field, allotments and village hall.
- access between Appleford and the community assets in Sutton Courtenay, such as church, school, shops, nursery, petrol station, pubs and village hall.
- access between Appleford and the facilities of the market town of Abingdon.
- access from Appleford to the Millenium Common, a jointly administered community asset shared between Appleford/Sutton Courtenay.
- Access between Appleford and Sutton Courtenay via Appleford Level Crossing and the BOAT following the Portway/Old Wantage Way path.

The sensitivity of these assets is very high as they form daily links for many residents in Appleford and surrounding communities. The road will have a significantly adverse effect due to the density of traffic on the proposed HIF1 road and the complexity of access from the north and south of Appleford via the HIF1 road.

2.6 Section 13.10.14 states that to minimise any disruption to the operator of Appleford Sidings (Hanson) “*the construction of the bridge (will be undertaken) during non-working hours (as the railway operations at Appleford Sidings are not 24 hours, 7 days a week) .*” This statement fails to grasp the significance of activities at Appleford Sidings. Currently the 6 days a week operating hours of the sidings are proposed to be extended to between 6.00am and 10:30pm subject to planning approval. Any attempt to construct a road and bridge at

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Appleford sidings between 10:30pm-:00am will subject nearby dwelling to 24 hour noise and pollution. This is a major adverse impact. This will cause an intolerable and severe impact on an extremely sensitive area. This area is classified by DEFRA as a Noise Action Plan Important Area.

- 2.7 . Section 13.10.39 states that the effect of the proposed road on PRoW 12 from Sutton Courtenay to Appleford will be neutral and not significant. This assessment fails to appreciate that this is the only viable footway between Sutton Courtenay and Appleford. The existing road link B4016, has no pavement and has a number of hazardous bends. The construction of the HIF1 Road will have severely adverse effect on access to this PRoW.
- 2.8 Section 13.10.52 declares that “*no accessibility or severance issues have been identified for community educational recreational or health facilities*” . this fails to recognise the strong dependance in Appleford on convenience access to these facilities in Sutton Courtenay and Abingdon. The HIF1 will impede existing convenient access along the B4016 Appleford road by splitting this road with two junctions intercepting with the HIF1 route. This HIF1 has a severe adverse effect on accessibility as a community health indicator. In this respect the conclusion of section 13.10.66 is misleading. No sizable access benefits accrue to the communities of Appleford, Culham, Clifton Hampden and neighbouring parishes to outweigh the impact on community assets. The conclusion of section 13.10.74 is also false and misleading. This states that residents living in proximity to the Scheme will see “improved access to healthcare and social infrastructure” The proposed road, ultimately designed as a dual carriageway regional link road between the A34 and east Oxford/M40, is not primarily intended to meet local connectivity needs. Health benefits attributed to the Scheme, such as public transport infrastructure (section 13.10.75) and footpath cycleway networks (section 13.10.76) are achievable without the necessity of constructing an arterial road.
- 2.9. Section 13.10.57 & 58 refers to air quality. Examination of the submitted ES Chapter 6 on Air Quality has demonstrated that this document is defective in the analysis of the impact of air pollution on communities close to the proposed road.
- 2.10 . Section 13.10.77 anticipates “*no likely significant air quality effects on human health*” . Examination of the ES Chapter 6 on Air Quality has shown a paucity of baseline measured data and conclusions on air pollution based upon suspect traffic modelling. Exposure limits of NO₂ do not use the most recent advisory limits (WHO) and PM_{2.5} is not assessed. The conclusion that “the scheme is assessed to have a neutral health outcome” is therefore not based on robust evidence and is defective.
- 2.11 Section 13.10.79 to 82 in respect noise and vibration, recognizes negative health outcome for some properties in Appleford, Sutton Courtenay, Culham and Clifton Hampden. It also states “*a residual positive health outcome*” in respect of noise for some properties in these locations. The ES noise assessment fails to encompass local noise sources, and forecasts noise outcomes on the basis of suspect traffic data and modelling. The ES noise assessment fails to address the impact of an expected high proportion of HGV and elevating the proposed road, above adjacent dwellings in Appleford. The conclusion of a positive outcome is not based on robust evidence.

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2.12 . Section 13.10.79 to 82 admits that the Scheme will result in *“impacts on local landscape character areas”* particularly the Thames floodplain and Clifton Hampden farmland. This will have a *“negative health outcome on people who live in and regularly access and use”* these areas. This section concludes that *“by operational year 15 the Scheme’s proposed landscaping will have established”* and the adverse effects *“will be effectively mitigated”*.

This fails to admit salient condition:

- mitigation measures must be incorporated at the completion of any scheme, and not reliant on uncertain future provision.
- the intrusive scale and height of the viaduct approach to the Thames and the Thames river bridge could not be mitigated by tree planting. These structures would remain dominant in the Green Belt landscape and local viewpoints.
- The height of the structure, and lack of separation ground between the Appleford Sidings bridge and adjacent dwellings in Appleford severely limit the ability to use landscape to mitigate the dominance of this structure over the dwellings.

2.14 . Section 13.11 declares that no monitoring, after construction, will be required as no severe impact have been identified. Many of the assessments on noise and vibration and air quality are based on unreliable traffic forecasting and lack cumulative assessment in the case of noise and vibration. To ensure that the road, in whatever revised form it is developed, abides by agreed limits on noise and air quality, there is a need for ongoing monitoring, against standards agreed by local communities, to assess the impact on the lives of residents close to the road.

3.0 Conclusion

The NPPF National Planning Policy Framework States *“planning Policies and decisions should aim to achieve healthy inclusive and safe places.”* (Section 8, Paragraph 92 a),).

The Environmental Impact Analysis for the HIF1 road fails to demonstrate that the HIF1 proposal will meet this objective of the NPPF. The Planning application for the HIF1 road should therefore be refused.

It is now widely recognised that any benefits of new roads on traffic congestion is transitory . For the HIF1 road average traffic speed across the road network are predicted to drop back to the pre-road-construction traffic speed within 10 years.(1) The overall increase in traffic that this result implies will make achieving net zero transport in OXfordshire much harder to achieve.

(1) Traffic forecasts within the Didcot Paramics model, 2020 to 2034,

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On behalf of Appleford-on-Thames Parish Council