

Submission to the Planning Inquiry
CASE REF: APP/U3100/V/23/3326625

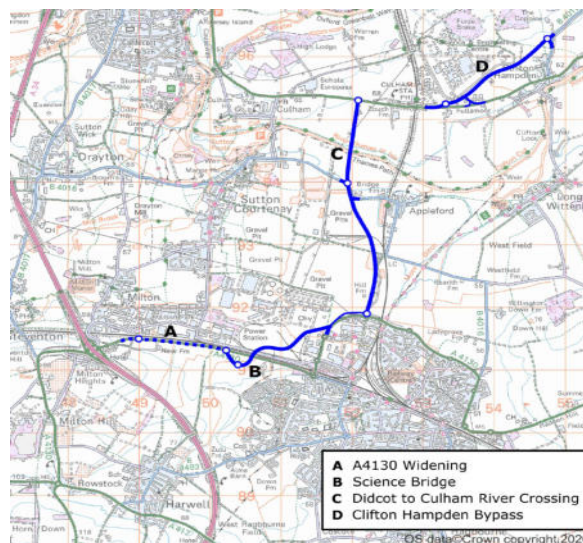
PROOF OF EVIDENCE ON
NOISE (Matter 6), AIR QUALITY (Matter 7), DESIGN (Matter 9),
HEALTH & WELLBEING, OPTION APPRAISALS, PLANNING COMMITTEE REFUSAL (Matter 14)

**Scheme: Application by Oxfordshire County Council : planning application number
R3.0138/21**

**Title: Dualling of the A4130 carriageway, construction of the Didcot Science Bridge, road
bridge over Appleford railways sidings and road bridge over the river Thames and
associated works between A34 Milton Interchange and the B4015 north of Clifton
Hampden Oxfordshire.***

Submitted by C J Hancock on behalf of
Neighbouring Parish Councils -Joint Committee (NPC-JC)
Representing
Parish Councils of Appleford, Culham, Burcot & Clifton Hampden, Nuneham
Courtenay, Sutton Courtenay

January 2024



Plan of the route of the HIF1 road as shown in the planning application

In the following material reference to this application has been shortened to the "HIF1 Scheme". As used in the application documents.

[Summary of Proof on Pages 4 - 7](#)

My name is Christopher Hancock.. At this Inquiry I am presenting **as a** resident of Appleford and as a member of the Working Group of Appleford Parish Council and the NPC-JC.

Since March 2020 I have represented Appleford's interests in this scheme, through the consultation exercises organised by the Parish Council with Oxfordshire County Council. Prior to the Planning and Regulation Committee of the 17th & 18th July 2023 I have submitted evidence on the noise, air quality and health and wellbeing impacts in response to the environmental statements provided with the HIF1 Scheme.

I am a practicing architect with the following qualifications BA. Dip Arch. M Phil. Reg Arch. I have 40 years' experience in development and design.

This Proof of evidence addresses,

- Matter 6 – Noise
- Matter 7 – Air Quality
- Matter 9 – High Quality design
- Matter 14 – policy matters relating to Health & Wellbeing, Option Appraisals, planning committee refusal

A summary of this evidence is presented at page 4 of this document.

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Glossary

OCC – Oxfordshire Country Council

SODLP - South Oxfordshire District Local Plan

VoWHLP – Vale of White Horse Local Plan

NPC-JC - Neighbouring Parish Councils Joint Committee (Representing Appleford on Thames, Culham, Burcot & Clifton Hampden, Nuneham Courtenay, Sutton Courtenay).

WebTAG -Transport Analysis Guidance: the transport appraisal process January 2014

ES – Environmental Statement, as submitted with the planning application

CCC Climate Change committee

LTCP -OCC's Local Transport and connectivity plan

1 Summary

1.1 On the 17th and 18th July 2023 The Planning and Regulation Committee of Oxfordshire County Council considered the planning application for the HIF1 scheme. On the 18th July The committee voted to refuse full planning permission for the application R3.0138/21.¹

Representatives of The Neighbouring Parish Councils Joint Committee-(NPC-RC) attended the committee session amongst the twenty-four speakers objecting to the HIF1 scheme.

1.2 Section 2, The introduction to this document states the central principle of objection to the HIF1 scheme.

1.3 Section 3 of this document summarises the reasons for refusal, based on the bullet point minutes of the committee meeting. An amplified report on the reasons for refusal is given in Appendix 1 to this document.

1.4 Section 4 of this document reviews the content of the Environmental Statement (ES) submitted in September 2021 in support of this planning application. The NPC-RC considered the impact of the HIF1 scheme on the local Parish communities regarding noise, air quality and health and wellbeing issues. Arising from omissions in the scheme and within the ES, requests under Regulation 25 of the EIA Regulations 2017 for further information were submitted and passed to the applicant's consultant AECOM in the period upto April 2022.² Further information was supplied by the applicant in November 2022. The NPC-JC submitted further reviews of these responses in January 2023.

1.4.1 Section 4.1 addresses the impact of noise.

Examination of the noise sections of the ES shows that the scheme is not compliant with NPPF and adopted local plans, specifically; NPPF paragraph 185; SODLP 2035 policy ENV12, DES6; VoWHDLP 2031 parts 1 & 2 policy STRAT 4, Dev policy 23 & 25. It fails to meet guidance in webTAG 2014 and fail to meet the aims of the Noise Policy Statement for England (NPSE) 2010, and PPG 2019 on noise.

Appleford village is a community under noise duress from industrial activity at Appleford Sidings and main line trains, recognised by DfT as a Noise Action Plan Important Areas (NAPIA). HIF1 fails to follow PPG2019 guidance, *"In cases where existing noise sensitive locations already experience high noise levels, a development that is expected to cause even a small increase in the overall noise level may result in a significant adverse effect occurring even though little to no change in behaviour would be likely to occur."* The HIF1 scheme includes a road bridge over the industrial rail Appleford siding. This will add road noise and redistribute rail and industrial noise. HIF1 fails to follow PPG2019 guidance take account of *"how the noise (source) relates to the existing sound environment"* and *"the local arrangement of buildings, surfaces and green infrastructure, and the extent to which it reflects or absorbs noise"*.

Appleford pointed out that baseline existing noise measurements failed to represent the qualities of the noise environment, rendering the noise computer model, based on these data, unreliable. The Applicant failed to undertake subsequent appropriate monitoring during the consultation and scheme development stages.

¹ Minutes of Planning & Regulation Committee 17,18th July 2023 published by OCC.

² OCC Letter from Environment & Place to AECOM dated 26 April 2022.

Nuneham Courtenay village lies astride the A4074 between Oxford and Wallingford and is also a NAPIA. The HIF1 scheme's eastern termination discharges all traffic onto the A4074. Most of the traffic will pass through the centre of Nuneham Courtenay. The impact of this traffic on the community has been excluded from assessment in the Environmental Statement (ES) notwithstanding that this traffic *"is forecast to experience an 87% increase in daily traffic by 2034."*³

1.4.2 Section 4.2 addresses the local impact on air quality

Examination of the noise sections of the ES shows that the scheme is not compliant with NPPF paragraphs, 105 & 185; SODLP Strat 4, policy EP1, ENV12; VoWHLP policies DP 23 & 26, 33(vi), 34, 43.

The Environmental Statement, Chapter 6 Air Quality, submitted in support of the road proposal does not demonstrate that the road has been aligned to minimise impact on air quality at neighbouring communities. It contains inaccuracies and limitations that renders it unreliable.

There have been no adequate measurements of the current levels of NO₂ PM₁₀ and PM_{2.5} at property boundaries for critical areas in Appleford. Limited to a single measurement which fails to capture the emissions from industrial activities at Appleford Sidings. The air quality dispersion computer model is not calibrated to real data and is therefore unreliable.

The ES fails to address the air quality implications of the HIF1 scheme for Nuneham Courtenay. As previously commented all HIF1 traffic, to and from the north will pass through the centre of this village. Pollution levels are already high due to existing traffic on the A4074, (See figure 4.1.3.C). This constitutes major omission in the assessment of harms against benefits.

The Environmental Statement fails to address concerns regarding levels of emissions of NO₂ PM₁₀ PM_{2.5} as identified by the World Health Organisation in 2021 and as identified and advised by the UK Health Security Agency in its response to the HIF1 road.⁴

The failure to include induced traffic on the proposed HIF1 road in the traffic modelling and over-reliance on expected reduction in village traffic has skewed the air quality assessment, unbalancing the assessment of harms against benefits.

1.4.3 Section 4.3 addresses the local impact on Health and Wellbeing

The HIF1 scheme has not been subject to a Health Impact Assessment (HIA) as required in District Council policies (SoDLP Strat 4 clause 5ii provision of HIA), and OCC's LTCP 2021, policy 12 and as suggested to OCC by Oxfordshire's Director of Public Health. This is required to fulfil the requirements of NPPF and PPG and as advised in "Health Impact Assessment in Spatial Planning", 2020, published by Public Health England.

Further issues of wellbeing include carbon reduction, sustainable transport, active travel and reduced car dependency. In these regards the HIF1 scheme fails to meet the SODC Corporate

³ ES Volume 1 Chapter 16 Transport Sept 2021 para 16.10.38.

⁴ UK Health Security Agency letter to OCC 8th December 2021

Plan 2020-2024 and the VoWHL 2031 core policy 16b to “reduce reliance on motorised vehicles “ in the Didcot Garden Town masterplan.

The ES Chapter 13 Population and human health attempts to address the health issues, but fails to meet the requirements of the scoping opinion referenced in table 13.3 *“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.”*

Deficiencies in Noise and air pollution assessment have been commented upon. In addition, access to community assets will be severely impacted by the HIF1 scheme. The road divides the Linked communities of Sutton Courtenay and Appleford.

The position of the HIF1 road will permanently disrupt typical 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 PRoW/BOAT following the Portway/Old Wantage Way path.

The admitted negative health outcome due to the impacts of the HIF1 scheme on local landscape character will not be mitigated as claimed. The intrusive scale and height of the viaduct and Thames bridge will remain dominant in the recreational landscape. The position of the Appleford Sidings bridge will be a permanent blight on the nearby residents of Appleford.

1.4.4 Section 4.4 Summarises the examination of Option Appraisal

The design of the HIF1 scheme was preceded by Option Appraisal Reports (OAR) in two parts in 2018 and 2019, and a further ‘updated’ OAR in 2021. The last of these underpins the current HIF1 proposal’s status as the preferred option in the planning application.

These appraisals fail in relation to two elements of planning guidance:

1. Non-compliance from the outset with guidance on ‘optioneering’, in particular the DfT WebTAG document ‘Transport Analysis Guidance: The Transport Appraisal Process’ January 2014
2. Conflict with Oxfordshire County Council (OCC) Local Transport Plan policies, updated and distilled in the new Local Transport Connectivity Plan (LTCP) adopted in July 2022

From the outset the preference for a road scheme has determined the option appraisals. No equal detailed assessment was undertaken of the ability of non-road packages of measures to meet parts of the transit and connectivity needs of current and future residents of Didcot and surrounding communities. Existing rail links across the Thames and potential public transport interlinks to form a reliable commuting network were not thoroughly examined. Comparative carbon emission and impact and benefits to local communities of alternative options were not undertaken in the OARs.

1.4.5 Section 4.5 examines the Design quality of Bridges within the HIF1 scheme.

The HIF1 scheme includes three road bridges; “Science Bridge” over the mainline railway; Appleford Siding Bridge over the private industrial railhead at Appleford; Thames Crossing, a viaduct over wetlands and a bridge over the River Thames.

The respective poor quality of these design fail to meet the objectives of NPPF paragraph 126 and for sustainability paragraph 157. The science bridge, as a gateway structure to Didcot fails to meet the objectives of paragraph 3.3 of the Didcot Garden Town Delivery Plan, and core policies 37 and 44 of the VoWHLP 2031.

2 Introduction

“The climate chaos may prove that humanity has not yet fully grasped the "deeply structural character" of climate change,”⁵

The Central Objection

The main dilemma for this application is to facilitate the provision of homes and employment in a manner that also serves the urgent need to address the global climate crisis.

For this scheme the most recent, relevant material considerations to define the required response to the climate crisis are:

- Climate Change Committee (CCC) 2023 report to Parliament “Progress in Reducing Emissions”
- OCC’s Local Transport and Connectivity Plan 2022 (LTCP)

The application is based on the premise that *“ It would not be practical to deliver the infrastructure necessary to the delivery of the adopted spatial strategy for housing and employment growth... without a highway of this scale and nature”⁶* NPC-JC disagrees. It is not axiomatic that this particular road, on this particular alignment, is uniquely able to facilitate homes and employment in South Oxfordshire.

The idea of a new road in south Oxfordshire, aligned north south, crossing the river Thames has been mooted for a decade. The application is a realization of this long held ambition by the highway authority. Now however, a road proposal has to be reconciled with current requirements (as CCC & LTCP) to reduce both traffic flows and traffic emissions in order to achieve transport carbon reduction targets.

The central objection to the road component of the application is that it does not attempt a reduction in vehicle journeys from new and existing housing and employment sites. It is widely appreciated that this can only be achieved by matching disincentives for private car use to incentives for the use of low emission travel, currently buses, trams, cycles, walking but also emerging electric micro-mobility units. The scheme does not offer this match.

⁵ Francois Gemenne , author contributor intergovernmental Panel on climate change (IPCC)

⁶ Officers planning report page 13 to OCC P&R Committee meeting 27/09/2023

Moreover the total carbon emissions, and other manifestations of traffic are not realistically presented in this application's support documents. NPC-JC argues that the traffic modelling for this road scheme is not a reliable representation of the flows across the road network and along the new road. Increase in traffic due to "induced demand" is not modelled. Changes to driving behaviour due to emission reduction measures are not modelled.

NPC-JC takes the view that the core provision of this scheme is inappropriate to match growth to emission reduction. The scheme if implemented will fix long term car dependency for existing and new housing areas. This application must be rejected to allow a strategy to be developed that brings housing developers, employers and infrastructure authorities to work together to provide local, low emission commuter and transport systems, in South Oxfordshire. This is required to provide the alternative to ever increasing private car dependency.

3 Reasons for refusal of full planning application.

On the 17th and 18th July 2023 The Planning and Regulation Committee of Oxfordshire County Council considered the planning application for the HIF1 scheme. On the 18th July The committee voted to refuse full planning permission for the application R3.0138/21.⁷

The NPC-RC attended the committee session amongst the twenty-four speakers objecting to the HIF1 scheme. NPC-RC amplified the reasons for refusal based on the bullet point minutes of the meeting. Appendix 1 provides these reasons.

The reasons for refusal can be summarised as :

A Carbon Emissions /Net Zero .

The application is not consistent with Oxfordshire's Climate Action Framework 2020 and Climate Change Committee 2023 report to parliament. The climate change Position Statement (CCPS) submitted with the application fails to meet the requirements of policy 27 of the LTCP. The scheme undermines the intent of adopted District CO2 emission policies: e.g SODLP: Objective 8, policy Strat 1, STRAT 3 (1vii), STRAT 4 (clause 5x), DES 7, DES 8, DES 10, ENV 12.

B Transport and Infrastructure

The application conflicts with the requirements of the adopted LTCP of July 2022 policies 1, 2, 16, 17, 26, 27, and policy 36

C Traffic modelling

The Environmental Statement on traffic modelling fails to meet the requirements of the DfT Transport Analysis Guidance (webTAG) 2014, due to its failure to consider alternatives to the road and to its alignment.. Modelling fails to include induced demand within the traffic

⁷ Minutes of Planning & Regulation Committee 17,18th July 2023 published by OCC.

modelling, leading to over-estimation of the benefits and under-estimation of the harms of the scheme.

D Harm V Benefits

Insufficient examination and weight afforded to the harm presented by the scheme compared to the benefits cited to meet the requirements of the NPPF. Absence of Health Impact Assessment in conflict with NPPF, LTCP policy 9, SODLP Policy STRAT 4. The application fails to comply with adopted Development Plans, NPPF and PPG guidance on the impact of the scheme on noise, air quality and health.

E Option Appraisals

The assessments of options undertaken do not comply with DfT WebTAG and with the adopted LTCP July 2022.

F Green Belt Policies and Harm to Landscape

With reference to NPPF paragraphs 147, 148, 150 the application does not represent “very special circumstance” or provide preservation of “openness” that would justify its development within the Green Belt.

G Bridge Designs

The bridge designs fail to meet the standards and processes required in NPPF 126,129,130,131 and the Didcot Garden Town Delivery plan.

H Heritage assets

The traffic impact of the scheme on the historic centres of Abingdon and Nuneham Courtenay has not been considered. The scheme conflicts with NPPF paragraph 199, 200, SODC policies ENV6, ENV7, ENV8. VoWHLP core policy 39.

4 Review of the Environmental Statement submitted with the planning application.

4.1 Noise

4.1.1 Appleford-on-Thames

A statement of objection to the road proposal was submitted on 20th May 2022 by Appleford Parish Council on behalf of the Joint Committee of Neighbouring Parish Councils of Appleford, Clifton Hampden & Burcot Culham, Nuneham Courtenay and Sutton Courtenay (NPC-JC). This addressed the deficiencies in the Environmental Statement Volume 1 Chapter 2 & 10 on Noise and Vibration, see Appendix 2 Tab1. The applicant provided comments within a general response under EIA regulation 25 requests on 14th November 2022” (file name: “*Additional Information EIA Regulation 25 Response(1). Pdf*) See Appendix 2 Tab 2 for the extracts relevant to noise issues in Appleford. The Parish Councils responded with

further comment on 17th January 2023, see Appendix 2 Tab 3. Subsequently the Applicant issued a revised version of ES Chapter 10 dated 26th April 2023. The Parish Councils issued a response to this on 7th May 2023, see Appendix 2 Tab 7

- 1 From the ES report and subsequent responses, the Parish Councils conclude that the HIF1 scheme is not compliant with NPPF paragraph 185 requiring that it should *“mitigate and reduce to a minimum potential adverse impacts resulting from noise.... and avoid noise giving rise to significant adverse impacts on health and the quality of life”*;

The HIF1 scheme does not comply with District and County planning policies **SODLP 2035** policy ENV12 Pollution Human Health, natural environment, local amenity, policy DES6 Residential Amenity; **VoWHDLP 2031 parts 1 & 2** policy STRAT 4 Strategic Development, Development Policy 23 Impact of Development on Amenity, Development Policy 25 Local plan part 2 Noise pollution.

- 2 The HIF1 scheme fails to meet the three aims of the Noise Policy Statement for England (NPSE) 2010. These aims are the fundamental basis for noise assessments and require a scheme to *“Avoid significant adverse impacts on health and quality of life...”*; *Mitigate and minimise adverse impacts on health and quality of life;* *“contribute to the improvement of health and quality of life”*;
- 3 The scheme, and its noise assessment, fails to meet the requirements of the DfT Transport Analysis Guidance (webTAG) 2014 due to its failure to consider alternatives to the road and to its alignment to ensure a balanced transport provision with least impact on existing communities.
- 4 The scheme fails to match the requirements of Government Planning Practice Guidance 2019 on Noise as it fails to take account of *“how the noise (source) relates to the existing sound environment”* and *“the local arrangement of buildings, surfaces and green infrastructure, and the extent to which it reflects or absorbs noise”* and fails to recognise that *“In cases where existing noise sensitive locations already experience high noise levels, a development that is expected to cause even a small increase in the overall noise level may result in a significant adverse effect occurring even though little to no change in behaviour would be likely to occur.”*

And for the following reasons applicable to Appleford:

- 5 Specifically the scheme fails to follow PPG 2019 requiring that *“Noise Action Plans ..Important Areas (NAPIA)..should be taken into account”*. The NAPIA at Appleford as identified by DEFRA, has been ignored in the assessment of the adverse noise effect of the HIF1 road. The Regulation 25 response of 14th November claims that the rail noise source *“is unrelated to the Scheme”*. This response fails to meet the need to assess the cumulative effect of different noise sources impinging on this NIA and surrounding locations.
- 6 No further noise monitoring in Appleford has been undertaken in the period May to November 2022 to address the deficiency in base line assessment of the noise environment. NPC-JC has pointed out that noise contributors include main line rail, industrial aggregate handling at Appleford Sidings, HGV movements at the Portway and traffic on Main Road.

- 7 The Regulation 25 response admits *“ambient noise levels in this location (Appleford Level Crossing) are higher than indicated by the predicted Do-Minimum traffic noise levels”*, due to these contributors not being adequately assessed.
- 8 Modelling of the predicted noise environment is deficient as it fails to incorporate the characteristics of noise sources, e.g., Tonal, low frequency and impulsive nature of the industrial noise, periodicity of the main line rail noise, and continuity of imposed traffic noise from the HIF1 road scheme. It also fails to acknowledge and represent the noise impact of the proposed elevated road over Appleford railway sidings, i.e., rail noise below the arching bridge structure and the roadside noise screens reflected towards adjacent dwellings in Appleford. It fails to represent the specific noise contribution of vehicles accelerating and decelerating on the gradients leading to the road bridge.
- 9 There are no noise assessments for alternative alignments of the route of the road. It cannot be demonstrated that this alignment has been chosen as the one causing least adverse impact on adjacent communities.

The consultation response dated 22nd December 2022, of the Vale of White Horse District Council, recommends realigning the road in the section Didcot-to-River Crossing, to reduce the “significant adverse effects” of the road on adjacent dwellings. This comment recognises that the adverse environmental impacts, in terms of noise, air quality and visual intrusion were not adequately assessed at the route selection stage of the scheme.

- 10 The need for noise mitigation measures demonstrates an inappropriate alignment of this road scheme. The proposed mitigations are inadequate and inappropriate. The proposed low noise road surface addresses only tyre noise and is ineffective for speeds below 75km/hr. Noise from engines, acceleration and aerodynamic sources are not mitigated. The response from the planning team of the Vale of White Horse District Council (22 December 2022 ref P22/V2475/CM) confirms that the proposed *“acoustic barriers are visually intrusive”*. Moreover *“a Green barrier,”* as proposed to soften the appearance, *“will be viewed against the sky and will stand out making it more intrusive”*.
- 11 NPC-JC’s objection of 20th May 2022 cited a long list of unresolved deficiencies in the Environmental Statement, Chapter 10, Noise and Vibration including:
- Failure to identify impacts on “tranquil areas”
 - Lack of monitoring/modelling at building elevations and gardens facing the HIF1 road
 - Limited traffic modelling, excluding induced HIF1 traffic & alternative traffic management strategies for village roads.
 - No consideration of the intrusive landscape impact of 3m high noise barriers. Failure to examine alternative LA111 mitigation measures.
 - Failure to assess noise impact on Nuneham Courtenay, properties in Sutton Courtenay, Culham, Clifton Hampden & Burcot, and Milton Heights.
 - Misleading statements on construction impact, e.g. Appleford sidings bridge.

These concerns remain, despite the further information supplied under Regulation 25.

Appleford is a community under noise duress. A survey of residents commissioned in 2022 ,see Appendix 2 tab 6, shows that existing noise from industrial activity at Appleford sidings negatively affects 78% of respondents. The proposed HIF1 road will provide a further noise source in the same location. 95% of Appleford respondents consider this will adversely affect noise levels in the community.

4.1.2 Nuneham Courtenay.

The village of Nuneham Courtenay consists of rows of cottages sitting astride the A4074 connecting Reading to Oxford. The HIF1 road connects the regional A34 at its western end to the B4015 at the eastern end, connecting at the Golden Balls roundabout, to the A4074 approx 1.4Km south of Nuneham Courtenay.

The cottages form a tight chasm enclosing the road, resulting in a concentration of traffic noise (figure 4.1.2A, Figure 4.1.2B) and air pollution (Figure 4.1.2C) close to the dwelling. Existing traffic conditions are already damaging to the village.

If the HIF1 is built, all Oxford bound traffic entering and leaving the eastern end of the HIF1 road will pass through the village, generating further noise and air pollution. There are no alternative routes. The impact of this traffic has been excluded from assessment in the Environmental Statement (ES) supporting the HIF1 Application. The ES states *“the applicant has not assessed these areas due to the intervening distance between the proposed development and the receptors”*⁸

However the ES does state: *“The B4015 Oxford Road (link 41) is forecast to experience an 87% increase in daily traffic (including 74% increase in daily HGVs) by 2034 with the implementation of the Scheme”*.⁹ (Figure 4.1.2D)

The traffic flow on the HIF1 road is expected to be between 14,000 to 30,000 vehicles per day with Oxford traffic, passing through Nuneham Courtenay, forming a high proportion. Noise and traffic pollution is planning harm, Failure to assess and to design to avoid or mitigate, is a breach of adopted development plans. (SODLP Policies STRAT4[5iv & 6v], EN12, DES6, EP1), NPPF para 185, material consideration of the LTCP, PPG on noise, failure to take into account Noise Action Plans Important Area (NAPIA) of Nuneham Courtenay.

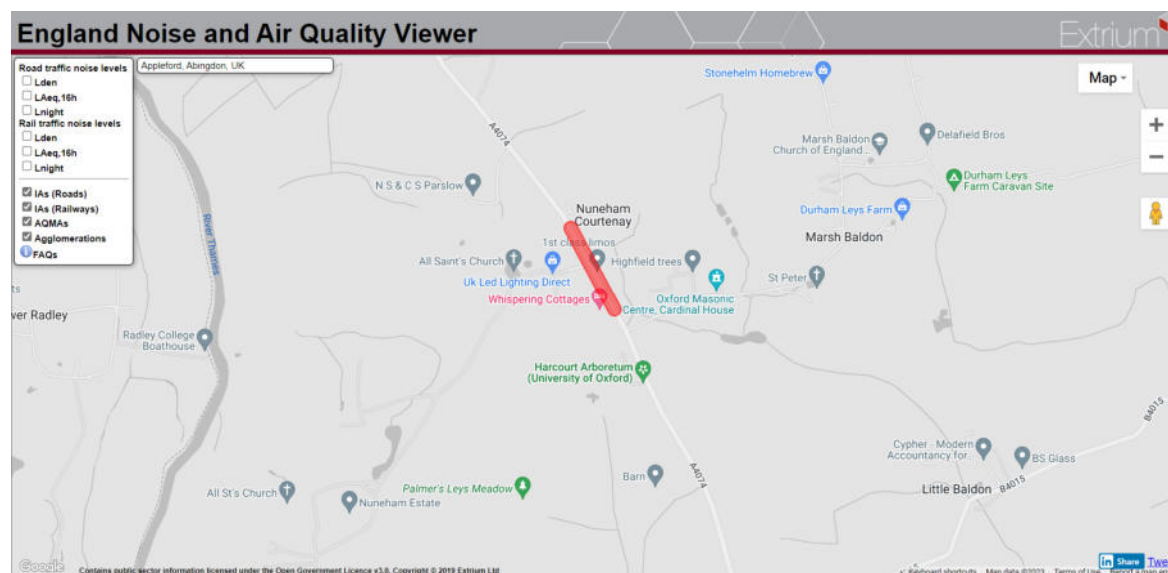


Figure 4.1.2A DEFRA mapped Noise Important Area (NAPIA) covering the entire roadside village of Nuneham Courtenay.

⁸ Officers report to OCC planning Committee 17/18th July 2023 para 184

⁹ ES Volume 1 Chapter 16 Transport Sept 2021 para 16.10.38.

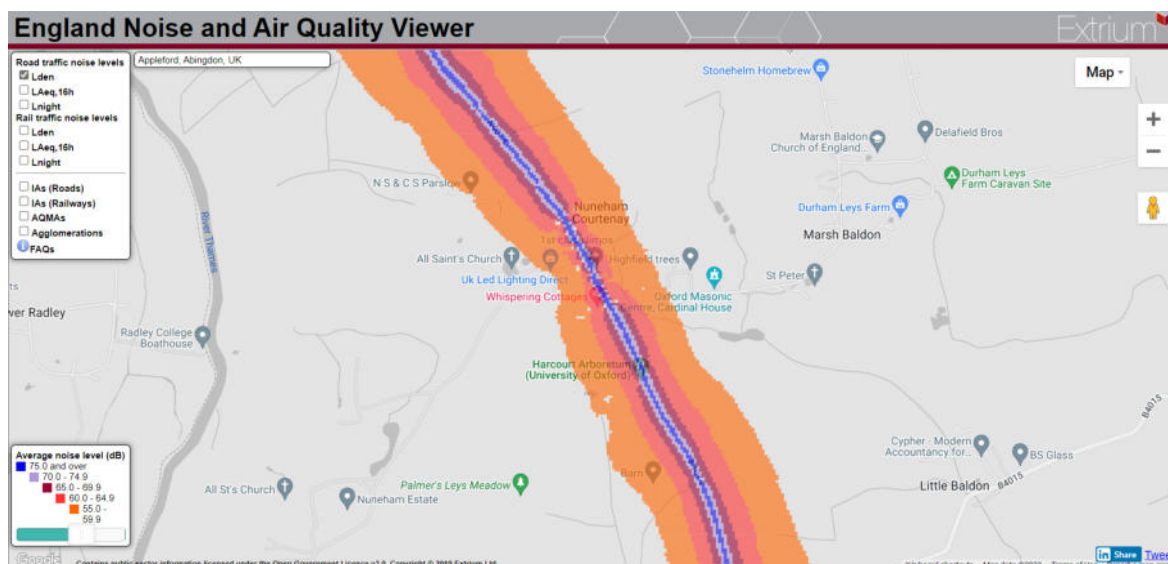


Figure 4.1.2B DEFRA mapped Noise contours for the A4074 , indicates noise levels between 65 dB and 75+dBa due to existing traffic through the centre of Nuneham Courtenay .



Air Quality indices for properties in Nuneham Courtenay Post code OX 44 9NY.

PM2.5 – 11.11mcg/m3 (WHO limit 5mcg/m3)

PM 10 – 17.69 mcg/m3 (WHO limit 15mcg/m3)

NO2 – 20.80 mcg/m3 (WHO limit 10 mcg/m3)

Source: addresspollution.org (COPI)

Figure 4.1.3.C Estimated Air Quality indices in Nuneham Courtenay on the basis of the grade of road.

		All Vehicles				HGV			
		No HIF1	HIF1 In place			No HIF1	HIF1 In place		
Link		2034 DN	2034 DS	Absolute Difference	Percentage Difference	2034 DN	2034 DS	Absolute Difference	Percentage Difference
41	B4015 Oxford Road	14,741	27,640	12,898	87%	451	784	333	74%

Figure 4.1.3.D Extract from Table 16.14: 2034 Daily Two-Way Traffic Flows.

Environmental Statement – Volume I Chapter 16: Transport

(Link 41 is the eastern end of the HIF1 scheme where it meets the existing B4015)

4.1.3 Nuneham Courtenay Heritage Asset

Nuneham Courtenay is a historic village of National importance. One of only two of the best preserved “removed” villages in the UK, it is a conservation area with both the Grade 1 listed house, garden and landscape and all the original cottages along the main road having a Grade 2 listing. It is an entity. Residents have reported structural effects on roadside cottages due to existing traffic flows. For this road scheme, planning officers advised that “*great weight should be attached to the need to conserve the significance of the designated heritage assets*”¹⁰. However, The ES excludes consideration of the effect of additional traffic on the historic roadside fabric of the village and in the absence concludes “*No significant changes to traffic volumes are predicted for this settlement (see ES Chapter 16: Transport) and no impact to the value of listed buildings in this settlement are predicted. The impact of the Scheme is therefore assessed as negligible, resulting in a slight adverse effect and permanent, which is not significant*”.

Failure to include a proper assessment of the scheme on the historic fabric of Nuneham, Courtenay is a breach of Development Plans SODC ENV6(2), ENV7(3i), ENV8(1vii), and NPPF paragraph 199.

¹⁰ Officers report to OCC planning Committee 17/18th July 2023 para 264

4.2 Air Quality

The following is a review of the impact on the health & wellbeing of residents close to the proposed route of the HIF1 road.

The NPPF National Planning policy framework States *“planning Policies and decisions should aim to achieve healthy inclusive and safe places.”*

The Annual report from Oxfordshire’s Director of public Health states *“There is growing evidence that there are significant benefits for local people by taking an approach to planning housing, infrastructure, and the economy, with health and wellbeing as the centre of focus.”* (page 27) Amongst the range of relevant issues are traffic control and air pollution.

District Council policies identified the need for Health Impact Assessments (HIA) to be conducted for all strategic developments to determine how the development will improve health and wellbeing.

The Vale of White Horse, Local Plan 2031 seeks to build healthy and sustainable communities which protect the environment and respond to climate change.

Oxfordshire Joint Health and wellbeing Strategy 03/2019 states. *“There will be a massive increase in new housing in Oxfordshire, creating new communities. The challenge is to find a better way to plan for and shape communities so that they actually promote health and wellbeing”*

Oxfordshire County Council’s - Local Transport and Connectivity Plan (LTCP) October 2021 states. *“Current trends of car use have contributed to congestion and public health issues across the county. In order to address these challenges, we have to reduce the need to travel and discourage unnecessary individual private vehicle use.” “However, the health of Oxfordshire residents and the protection of our environment is paramount. The benefits of this approach will be felt by all people today in terms of improved health, cleaner air and easier journeys.”*

LTCP 2021 also states *“Poor air quality is the largest environmental risk to public health in the UK. “ “Oxfordshire’s air pollution comes from a variety of sources, and the mix of sources varies significantly by location. At roadside locations in the county with heavy traffic, road transport accounts for as much as 75% of NOx and 20% of particulate matter emissions.”*

The current planning application is not based on analyses to minimize pollution and emissions at existing communities adjacent to the proposed road. It should therefore be rejected.

4.2.1 Didcot Garden town HIF1 Scheme Environmental Statement Volume 1 Chapter 6-Air Quality

The Environmental Statement, Chapter 6 Air Quality, submitted in support of the road proposal contains inaccuracies and limitations that renders it unreliable. The sections of this document are analysed in the following notes.

- 4.2.2 Section 6.2 makes no reference to the air pollution guidelines produced by the World Health Organisation (WHO). Recently updated WHO guidelines (2021) are based on the evidence that toxic particles and gases harm human health at much lower concentrations than previously thought. Current WHO guidelines for annual emissions limits pollutant concentrations to 5 mcg/m³ for particulates PM_{2.5} and 10 mcg/m³ for nitrogen dioxide NO₂. It is now recognised that UK legislation is no longer adequate to assess the impact of new road proposals. The permitted emissions assumed in the HIF1 Air Quality Assessment exceed the current WHO guidelines by 500% for PM_{2.5} and 400% for NO₂. Whilst there are difficulties in reducing current emissions for existing roads there are no such difficulties in assessing a new road proposal in an area where existing emissions are lower. The highest standard for AQ needs to be adopted for new sections of the HIF1 road. Appleford village is one community lying closest to a new section of the proposed road. Current air quality at Main Road Appleford shows levels of PM_{2.5}, PM₁₀, NO₂ in excess of WHO guidelines, see Appendix 2 Tab 5. It is reasonable to position the HIF1 road in relation to Appleford to ensure that the road does not, in itself, increase emissions further in excess of the WHO guidelines. If more punishing levels of emissions are to be considered to facilitate the road, this must be through consultation and agreement with the communities that will be affected. OCC undertook no consultation with the Parish Council and residents of Appleford to agree emission standards to assess the road proposal.
- 4.2.3 In so far as the change to air quality, due to the proximity of the proposed HIF1 road close to Appleford, has not been properly assessed, the road scheme does not follow the Planning Policy Guidance of the NPPF.
- 4.2.4 A proper air quality assessment would demonstrate that, for locations like Appleford, the Scheme does not comply with the VoWH local plan as it will increase air pollution. It fails to meet VoWH policy DP26 and DP23 (iv) Impact of development on amenity, as it does not demonstrate that the road has been aligned to minimise air quality impact.
- 4.2.5 The document makes no attempt to model PM_{2.5} (as section 6.4.17 confirms). There is increasing awareness that smaller particulates have a critical effect on respiration. The Air Quality Analysis is therefore incomplete.
- 4.2.6 There have been no adequate measurements of the current levels of NO₂ and PM_{2.5} at property boundaries for critical areas in Appleford. A single roadside measurement at a junction of the village Main Road and Church Street (table 6.10 location RIV3) indicated an annual NO₂ mean of 25.5 µg/m³. Unfeasibly this appears to exceed all roadside values measured at the busy A4130 between the A34 and Didcot town centre. This single measurement, possibly in error, cannot be relied upon to characterise the current air quality in Appleford. The Air Quality Assessment has no reliable basis to predict the change to Appleford's air quality.
- 4.2.7 With insufficient local air quality monitored data for Appleford, the air quality dispersion model, as described in paragraph 6.4.25) cannot be calibrated to real data. The output from the dispersion model for Appleford is therefore unreliable.
- 4.2.8 Contrary to paragraph 6.4.28, as there are insufficient local air quality monitored data for Appleford, existing pollutant concentrations from specific local activities have not been

included in the assessment, e.g. rail aggregate handling at Appleford Sidings, asphalt works, landfill and HGV movements immediately south west and upwind from Appleford.

- 4.2.9 The modelled pollutant concentrations at “public exposure receptors” along Main Road in Appleford, (locations R107, R26, R90, R69, R24, R100, R66, R74, in table 2 of ES vol III Appendix 6.2) are not based on credible traffic flows. Weight restrictions on HGV through Appleford will continue to apply. Speed restrictions will be maintained or lowered with or without the HIF road. The modelled reduction in NO₂ along Main Road due to the HIF is not credible. The only location of monitored real data, (location R107, matched to location RIV3), shows modelled values from the road well below the present measured value. The contribution from HIF1 and also local road traffic on top of other sources of pollution is not explored or explained.
- 4.2.10 HIF1 ES Chapter 6 Air Quality section 6.8.6 states “*Higher traffic flows and average speeds are expected on the new proposed roads and bridges when compared (to) a do minimum situation without these roads. This could lead to higher emissions and higher annual mean concentrations of NO₂, NO_x, and PM₁₀ at sensitive receptors close to these new roads in the opening year with the Scheme when compared to the opening year without the Scheme.*”

The above statement appears to be common sense. However in contradiction the scheme Planning Statement, para 7.11.2 asserts that “*the Site is not considered particularly sensitive in terms of air quality*”. And “*there will be no exceedance of the objective for annual mean NO₂*”.

Therefore the HIF1 ES Chapter 6 Air Quality, section 6.9.2 & 6.9.6 confirms that “*no specific, essential or enhanced air quality mitigation measures have been incorporated into the Scheme design.*” And “*no monitoring of significant effects is proposed*” para 6.11.2

Due to errors and omissions in the Air Quality Assessment as described above the true magnitudes of the resulting emissions in communities close to the proposed road have not been established and are likely to be under reported.

The underpinning assumption within the Air Quality Assessment for the benign affect of the proposed road is stated in section 6.8.5 as “*intended to relieve unsustainable congestion between Clifton Hampden and Milton Interchange with a focus on the A4130 and Didcot Town, and thereby reduce emissions via reducing the quantity of idling or slow-moving vehicles in heavy traffic. It is therefore expected that there will be reductions in annual mean concentrations of NO₂, NO_x and PM₁₀ within these locations due to the Scheme.*” No supporting evidence is presented. No measurements and analyses are presented to show the current emissions of idling traffic compared to flowing traffic on roads surrounding the proposed HIF1 route. Neither are there analyses of air quality at higher total traffic flows and speeds as induced by the proposed new road.

It would be expected that the net result, on the A4130, will be an overall growth in the amount of traffic, attracted from the A34 by the HIF1 new route to east Oxford and the M40. The scheme documents recognise this, as it is stated that the HIF will relieve congestion on the A34 (and by implication, on the Oxford Ring Road). Overall traffic emissions on this part of the A4130 are likely to rise, not fall.

Moreover, much higher levels of emissions will now be generated close to settlements, not currently experiencing high flows of passing traffic, eg Appleford, Sutton Courtenay, Culham and Clifton Hampden.

4.2.11 HIF1 ES Chapter 6 Air Quality. Para 6.10.16 refers to modelled levels of NO₂ and states “*The largest increase in annual mean NO₂ concentration is predicted at a residential property north of Hall Farm (R75, Appleford). With the Scheme in operation, the annual mean NO₂ concentration predicted at this receptor in the Scheme opening year is 16.0 µg/m³, an increase of 3.3µg/m³ from 12.7µg/m³.*”. This statement is likely to be the nearest reflection of the effect of the HIF road on dwellings in Appleford that lie closest to the proposed road route. Even this assessment fails to include existing emissions from the adjacent industrial activities around Appleford sidings. Moreover, the modelling is for a ground level road, at this location. The relationship of a proposed elevated road above the roof level of adjacent dwellings is not explored.

4.2.12 [HIF1 ES Appendix 6.2, Local Air Quality Assessment Results, states at paragraph 1.2.12 “*Along the Didcot to Culham River Crossing on the east side there are 12 receptors (R24, R25, R26, R27, R66, R68, R69, R74, R90, R100, R107 and R116) in Appleford which are predicted to experience decreases in annual mean NO₂ concentrations of 0.5µg/m³ to 2.8µg/m³ resulting in predicted concentrations of 12.9µg/m³ to 14.9µg/m³. This improvement is due to a predicted reduction of approximately 4,000 AADT on Main Road through Appleford.*”

This statement does not represent the actuality of the relationship between traffic on Main Road, Appleford and traffic on the proposed HIF1 road adjacent to Appleford. Main Road has weight restrictions prohibiting HGV traffic now and in the future. Traffic calming measures or vehicle restriction for commuter cars on Main Road must be in place if there is a future traffic growth, either due to the HIF1 road or other road scenarios. So there should be no substantial increase in traffic on Main Road (B4016) for future scenarios. The Air Quality Assessment is therefore in error. The HIF1 road will not create a reduction in NO₂ concentrations through Appleford village. However, the siting of HIF1 as an arterial road, will bring many HGVs within 60m of dwellings in Appleford. This is unprecedented and poses a substantial increase in all forms of traffic emissions close to Appleford.

4.2.13 HIF1 ES Appendix 6.2, Local Air Quality Assessment Results, states at paragraph 1.2.13 “*There are three receptors (R23, R65 and R75) close to the new road which are predicted to experience increases in annual mean NO₂ concentrations of 1.5µg/m³ to 3.3µg/m³ resulting in predicted concentrations of 14.3µg/m³ to 16.0µg/m³. This deterioration is due to a predicted flow of around 12,000 - 13,000 AADT with a speed of approximately 65 km/h on this section of the Didcot to Culham River Crossing.*”

This statement fails to recognise the particular circumstances of the traffic flow on the HIF1 road at the closest position to Appleford.

- The road is elevated above the roof level of dwellings that lie downwind and within 60-70m at the closest to the road. This will result in a distribution of the emissions from the road. The spread of emissions from the road at this distance is not specifically recognized in the modelling.
- The HIF1 road is at a gradient at both approaches to the road bridge over Appleford Rail Sidings. The changes of gear and engine speed, particularly for loaded HGVs will result in an increase in emissions. This is not specifically recognized in the modelling.

- 4.2.14 The concluding statement in para 6.10.17 *“Therefore, a conclusion of no likely significant air quality effects for human health is recorded”* is misleading. For communities that will be close to the proposed road alignment there will be serious health implications. The pollution levels will clearly exceed current WHO guidelines for NO₂ and PM_{2.5}.
- 4.2.15 The above notes, section 4.2 on air quality, constitute the substance of a submission to OCC by Appleford Parish Council on 7th February 2022 Council on behalf of the Joint Committee of Neighbouring Parish Councils of Appleford, Clifton Hampden & Burcot , Culham, Nuneham Courtenay and Sutton Courtenay (NPC-JC) To addressed the deficiencies in the Environmental Statement, Chapter 6, Air Quality. The applicant provided a response to this statement on 27th October 2022,” subject Appleford Parish Council Air quality Comments Response” (file name: Reg 25 Appendix S Air Quality Technical Note(1). See Appendix 2 Tab 1. The Parish Councils replied to this statement on 17th January 2023, see Appendix 2 Tab.
- 4.2.16 The Parish Council’s conclusions following this exchange of comments on the Air quality assessment are as follows.

4.2.16. Lack of comparative assessments of alternative routes

The applicant has not demonstrated that the chosen road alignment has been selected as the route with least air quality detriment on adjacent communities.

Contrary to the requirements of local planning policies e.g. VOWHLP Dev policy 26 , the lack of air quality investigations of alternative alignments for the HIF1 road indicates that the current route of the planning application is not based on route analyses to minimize pollution and emissions at existing communities. This planning application therefore remains non-compliant with planning policy.

The consultation response dated 22nd December 2022 submitted by the Vale of White Horse District Council, recommends realigning the road in the section Didcot-to-River Crossing, to reduce the adverse impact of the road on adjacent dwellings. This comment recognises that the adverse environmental impacts, in terms of noise, air quality and visual intrusion have not been given sufficient weight in this scheme.

4.2.16.2 Inadequate standards

The Environmental Statement fails to address concerns regarding levels of emissions of NO₂ PM₁₀ PM_{2.5} as identified by the World Health Organisation in 2021 and as identified as non-threshold by the UK Health Security Agency in its response and advice to OCC on the HIF1 scheme.¹¹ , see Appendix 2 tab 5.

4.2.16.3 Unreliable traffic modelling

Apparent failure to include induced traffic on the proposed HIF1 road and over-reliance on expected reduction in village traffic has skewed the air quality assessment.

¹¹ UK Health Security Agency letter to OCC 8th December 2021

4.2.16.4 Insensitive air quality assessment

The AQTN confirms that critical aspects of vehicle emissions, such as those created by the gradient of the flyover at Appleford sidings have not been modelled. The assessment also shows insensitivity to the presence of HGV traffic and proximity of the HIF1 route and properties in Appleford. The model ignores the impact (noise and tail pipe emissions) of fully laden HGVs and LGVs accelerating up the steep elevated section past Appleford (DN) and similarly HGV and LGV traffic heading south accelerating up the other side. This latter will not only affect Appleford but also properties in Sutton Courtenay (old Amy site area).

The Environmental Statement therefore remains deficient and not in compliance with the applicable EIA Regulations 2017.

4.3 Health & Wellbeing

- 4.3.1 The HIF1 scheme has not been subject to a Health Impact Assessment (HIA) as required in District Council policies (SoDLP Strat 4 clause 5ii provision of HIA), and OCC's LTCP 2021 , policy 12 and as suggested to OCC by Oxfordshire's Director of Public Health. This is required to fulfil the requirements of NPPF and PPG and as advised in "Health Impact Assessment in Spatial Planning", 2020, published by Public Health England.

The applicant acknowledges that "*Whilst a specific HIA was not conducted, Chapter 13: Population and Human Health of the ES has followed Design Manual for Roads and Bridges (DMRB) guidance to consider air quality, noise and visual impacts on the human health of nearby sensitive receptors, such as residents*".¹²

The preceding parts of this submission demonstrate, in the absence of an HIA, that the Environmental Statement for the road fails to adequately investigate and present the impact of noise, air pollution and access issues on local communities living close to the proposed path of the road. Appleford Parish Council provided a response to the Environmental Statement Volume 1 Chapter 13 Population and Human Health on 25th March 2022, see Appendix 2 Tab 8. The scheme fails to follow health related carbon and transport objectives in adopted local plans as explained below.

4.3.2 SOSDC

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.

¹²AECOM Air Quality Technical Note. Appleford Parish Council Air Quality Comments response 27/10/2022 (Regulation 25 Appendix S) Response to 1.3.

- 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

4.3.3 VoWHDC

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.

4.3.4 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.

- 4.3.5 The ES Chapter 13 Population and human health attempts to address the health issues, but fails to meet the requirements of the scoping opinion referenced in table 13.3 “*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*”

Deficiencies in Noise and air pollution assessment have been commented upon. In addition, access to community asserts will be severely impacted by the HIF1 scheme. The road divides the Linked communities of Sutton Courtenay and Appleford.

Section 13.10.5 of ES Chapter 13 examining effect on community assets fails to recognise that The position of the HIF1 road will permanently disrupt typical 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.

- 4.3.6 Section 13.10.52 of ES Chapter 13 declares that *“no accessibility or severance issues have been identified for community educational recreational or health facilities”*. This fails to recognise the strong dependence in Appleford on convenient 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.

Section 13.10.79 to 82 of ES Chapter 13 admits that the Scheme will result in *“impacts on local landscape character areas”* particularly the Thames floodplain and Clifton Hampden farmland, but this *“will be effectively mitigated”*. This fails to recognize:

- 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.

4.4 Optional appraisals

The design of the HIF1 scheme was preceded by Option Appraisal Reports (OAR) in two parts in 2018 and 2019, and a further ‘updated’ OAR in 2021. The last of these underpins the current HIF1 proposal’s status as the preferred option in the planning application.

These appraisals fail in relation to two elements of planning guidance:

3. Non-compliance from the outset with guidance on ‘optioneering’, in particular the DfT WebTAG document ‘Transport Analysis Guidance: The Transport Appraisal Process’ January 2014
 4. Conflict with Oxfordshire County Council (OCC) Local Transport Plan policies, updated and distilled in the new Local Transport Connectivity Plan (LTCP) adopted in July 2022
- 4.4.1 WebTAG requires assessments to start with as wide a range of identified options as possible, without preconceptions of a preferred outcome. However, the requirement for the whole road scheme of HIF1 had been ‘established’ by the Local Plan development targets from 2014 onwards.

Policy 36 of the LTCP states that OCC *“will only consider road capacity schemes after all other options have been explored”*. The central problem of the option assessment is that there has not been adequate consideration of alternatives to road building at the earliest stages in the project development. The application has not demonstrated detailed assessments of the extent to which public and active transport can meet a proportion of the travel needs arising from existing and proposed housing development in the Didcot area. OCCs Appendix K para 3.8 admits that *“one of the main objectives of the Proposed Development (HIF1) is to provide additional highway capacity”*.

4.4.2 Alan James in reviewing the Options Appraisals comments¹³, see Appendix 2 Tab 10 , stated:
*“It is futile to pretend that the scheme promoters only moved on to a road capacity scheme having exhausted all other possibilities. The starting point was that there was a presumption in favour of new highway capacity, purportedly established by earlier Local Plans that have since been revised to reduce the levels of potential development. At best, HIF1 was only ever assessed **alongside** imprecise and half-hearted non-road options: there was never any suggestion that the alternatives were considered **sequentially**, with the road scheme as a last resort. There was also little if any attempt to harness the synergies of non-road options with or without some new highway infrastructure, to present genuine multi-modal options: it is not a multi-modal option simply to provide footways, cycleways, or improved road crossings”*

4.4.3 A review of Option Appraisal Report (OAR) part 2, see Appendix 2 Tab 10 concludes:

“Section 6.1.1 indicates that the long list options were assessed against the criteria of “scheme objectives” plus affordability. Deliverability, acceptability, feasibility. Development options were scored on a 2 to -3 scale. The Sift results are tabulated in appendix 2.

No objective link between the scoring and the characteristics of each option is described. It is clear that the scoring is a subjective matter of personal judgement. There is no indication of a consensus view from individuals from different disciplines or with different viewpoints. The lack of objectivity renders the results highly questionable.

The report admits that “affordability” refers only to already identified/secured funding. This is a skewed criteria, as at the date of the OAR only the 4 component road option had identified HIF1 . Thus, all non-road options (e.g. public transport options) were declared unaffordable.”

4.5 Bridge Designs

The Parish Councils commented on the design and appearance of the road bridges and landscaping of the HIF1 scheme on 14th November 2022, see Appendix 2 tab 9 as a reply to the Regulation 25 response issued by OCC.

The generally poor and unsympathetic design of three bridges structures have been cited by the Planning Team of the Vale of White Horse District Council in their comments, dated 22 December 2023 to the Regulation 25 response, and by others.

4.5.1 Science Bridge

The standard of design for the structures of the HIF1 road scheme fall below the requirements local plans. SODC and VoWHDC have commented that the “Science Bridge” fails to meet the objectives of paragraph 3.3 of the Didcot Garden Town Delivery Plan (the DGTDP),¹⁴ see Appendix 2 Tab 9. SODC further states that the poor design is contrary to paragraphs 126, 130 and 131 of the NPPF and core policies 37 and 44 of the Local Plan 2031 Part 1.

¹³ Planning Application R3 0138/21 (HIF1) Review of Assessment Alternatives. A. James, January 2023.

4.5.2 Thames Bridge

VOWHDC commented *“The design of the River Thames Crossing between Didcot and Culham is not revised. Appendix G (Oversized bridge examples) of the Reg 25 response, provide little confidence that the bridge will be an attractive feature or sensitive to it’s rural setting”*¹⁴.

A landscape expert has described the river bridge and viaduct ¹⁵ as a *“low, squat, functional concrete structure, anything but the image of a soaring bridge allowing the landscape to flow effortlessly beneath.”* The impact on the viaduct and bridge on the riverbanks and otherwise tranquil area of the wetlands has not been properly examined.

4.5.3 Appleford Sidings.

The proposed alignment of the HIF1 road as it crosses private rail sidings at Appleford requires a bridge structure to form a very acute angle with the rail lines below. The design has been described by engineers as *“extremely lazy and wasteful of resources which could be significantly reduced by an improved design. Redundant deck projecting approximately 12m towards the homes in Appleford”* has a detrimental *“visual impact on Appleford residents”*.¹⁶ The height of the structure, at more than 10m above adjacent gardens, will dominate the skyline for adjacent dwellings.

The structures fail to meet the objectives of NPPF paragraph 126 and for sustainability paragraph 157.

¹⁴ Vale of White Horse District Council 22 December 2023 comments on OCC Regulation 25 response (see Appendix 2 Tab 9)

¹⁵ Objection on Landscape Grounds by A James January 2023 as Appendix 2 to Further Objection following receipt of Regulation 25 further information.

¹⁶ Private comments received by Appleford Parish Council from retired OCC bridge engineer Dec 2021.