

**STATEMENT OF CASE FOR ABP MOCKLER &
THE TRUSTEES OF THE MILTON MANOR SETTLED ESTATE**

THE HIFE1 ROAD BUILDING PROPOSAL - CASE REF: APP/U3100/V/23/3326625

INTRODUCTION

1. I, Mr ABP Mockler, will be appearing as representative, both of my own personal interest as owner of a section of the land that would be affected if the Compulsory Purchase Order were to go ahead; and as one of the two Trustees of the Milton Manor Settled Estate of which I am, in any case, the Life Tenant.
2. The other Trustee is Mrs GM Marsh, who also lives at Milton Manor, but who is at present, unfortunately, bedridden – though she did appear and speak briefly at a Oxfordshire County Council meeting last autumn when I was unable to attend in person.
3. I will call as a witness one of the Tenants of New Farm, listed as OBJ/19, Mr David Page, rather than asking him to make a separate Statement of Case. Mr Page and his family will be those most directly and immediately affected if the Compulsory Purchase Order and the road widening scheme were to go ahead.

**OBJECTIONS TO THE PLANNING APPLICATION FOR HIF1 IN GENERAL:
APP/U3100/V/23/3326625**

4. Having studied the Statements of Case put forward both by POETS and by the Neighbouring Parish Councils Joint Committee, we absolutely support all POETS objections, as indeed we would also support almost all the objections of the Joint Committee. In particular both of the previous objectors raise the Local Transport and Connectivity Plan (LTCP 2022) as being in obvious contradiction with what the applicant is proposing.
5. We also support very strongly the conclusions drawn by the Joint Committee on pages 5, 6, 7, 9 and the Oxfordshire Friends of the Earth Report as summarised on pages 12 and 13 which seems to put the case against HIF1 extremely clearly; and the further Report, whose conclusion is published on pages 21 and 22.

GENERAL OBJECTIONS TO THE COMPULSORY PURCHASE ORDER

6. The main reason given for the Compulsory Purchase Order which immediately affects the Trust's land lying between the Milton Interchange and the proposed Science Bridge is that it is necessary to double the width of the existing road, the A4130, to make it into a dual carriageway.

Why?

7. It seems to be blindingly obvious that this is a ridiculous and unnecessary proposition and that it should be rejected out of hand. If the whole purpose of HIF1 is to enable further development and house building to take place, we would question 'Why?', as there is already a perfectly good road for building materials and such like to be carried along and there is **no reason at all** to double its size. For the whole purpose of the HIF1 concept, as funded by Homes England, is basically, as its title indicates, to enable more houses to be built.
8. Furthermore, there is surely an innate contradiction between the plan to build a single carriageway for the vast majority of the proposed HIF1 scheme, but a dual carriageway for the first stages of the scheme. The logical conclusion is surely either to build a dual carriageway the whole way or a single carriageway the whole way. It makes no sense at all to create a future bottleneck where the proposed dual carriageway suddenly has to funnel into a single carriageway.
9. What indeed is the purpose of the dualling of the A4130? Apparently, it must be simply to relieve the congestion at rush hours between the Milton Interchange roundabout and the centre of Didcot.
10. But, a) this is nothing at all to do with facilitating house building; b) if we have understood it rightly, the very forceful argument put forward by both POETS and the Joint Committee is that any extra road space will simply induce car drivers to use their cars more and more; and that any increased capacity will fill up and result in further jams within a year or two. This is what we understand is meant by "induced demand".

TWO SPECIFIC OBJECTIONS

11. The first specific objection (which indeed is highlighted both by POETS and the Joint Committee) is that the planners have not properly considered alternatives to the HIF1 scheme.
 12. Indeed, in the original planning application submitted by Aecom, there is – almost hidden away within the half a million words – a few pages devoted to alternatives; all of which, unsurprisingly, were rejected by Aecom using very suspect – indeed self serving – criteria.
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13. Secondly, there is the financial question which the Joint Committee deals with on page 30 of its Statement of Case and POETS refers to on page 6. What we would ask the Inspector to consider is that this could very well be, mutatis mutandis, Oxfordshire County Council's equivalent of the HS2 scheme.
 14. There costs have rocketed; and apparently will continue to rocket; with great distress caused to many owners on both sides of the proposed scheme whose land and houses have been compulsorily purchased.
 15. And all for what? For what, it is now generally agreed (except by one former PM – now living locally! - who notoriously favoured vast infrastructure schemes) to be a white elephant that in the end will bring very little, if any, benefit; and will have cost the taxpayer – ie ourselves – a vast amount of money.

OBJECTIONS ON DIDCOT GARDEN TOWN GROUNDS

16. As the Inspector will have seen from our submitted documents, (Milton Fields Masterplan and Stantec's Transport Proposals) the road widening would have a pretty disastrous effect on the whole Milton Fields proposal. It would reduce the land available, obviously; it would increase noise and pollution, obviously; it would add to the volume of run-off water, obviously, and, even more obviously, it would be contrary to the whole idea of a car free development. In fact, it would risk having a most damaging effect on the whole scheme.
17. What we are particularly concerned about, and might only too easily happen, is that the planners, and indeed Councillors of Oxfordshire County Council, will say to themselves: "we've spent so much money on Aecom and on getting this whole scheme prepared that we really must have something to show for it" – a very human reaction! "So let's, even if we have to abandon the rest of the scheme, go ahead with dualling the A4130 so that then at least we can say we haven't wasted all this money that we've spent so far but achieved nothing at all."
18. This of course is very like keeping the London to Birmingham part of HS2; and one imagines that the same thought process went on there; as we believe the Inspector will appreciate.
19. It would really be the *worst of all worlds* if Phase A were to go ahead, almost as a face saving device and the applicants were sooner or later to abandon the rest of the scheme as being too expensive/too difficult/incurring too much opposition...

CONCLUSION

20. We rather agree with POETS that an alternative, much more moderate solution to the various traffic problems (perhaps including the re-allocation of road space as Professor Goodwin has often suggested) should be considered. We would propose adopting the Dutch solution, now apparently gaining favour in various part of Europe as well as in Holland, whereby those interested in such a project are consulted before any proposals are put forward; in, for instance, a round table discussion involving perhaps 20 to 30 people, including planners and those most directly concerned.
21. That way a consensus may emerge – instead of having a half a million word Planning Application put in by a party, and only then asking for comments/objections - (with all the difficulties, delays and time wasting for everyone concerned that the Inspector will no doubt appreciate has occurred in this most regrettable case).

List of Witnesses

Mr ABP Mockler

Mr David Page

Possibly Mrs G Marsh (the other Trustee) if well enough