

BY EMAIL

12 JUNE 2023

230612 NPC-JC Consultation Response [R3.0138-21]

Ms Emily Catcheside  
Planning Department  
Oxfordshire County Council  
County Hall  
New Road, Oxford  
OX1 1ND.

Dear Ms Catcheside

**STATEMENT OF OBJECTION – PLANNING APPLICATION [R3.0138/21]  
HIF1 Road between A34 Milton Interchange & B4015 north of Clifton Hampden  
REVIEW OF THE ENVIRONMENTAL STATEMENT - DATED APRIL 2023**

I am Chair of the Vale & South Oxfordshire, Neighbouring Parish Council Joint Committee (NPC-JC) comprising the five Parish Councils named above.

NPC-JC maintains its objection to the planning application. This letter refers to the Regulation 25 request dated 31 March 2023 and AECOM's response uploaded to OCC's planning portal 26 April 2023 and related documents.

**SECTION 1 - CONSTRUCTION PROGRAMME & TIMETABLE**

The Regulation 25 request dated 31 March 2023 is seeking information on project delivery and confirmation of the 'validity' of the proposed construction programme referencing conditions, boundaries between parts, 'drawings' and the implications of project delay and timeframe for conclusions on environmental effects.

AECOM fails to answer or address these questions and invokes the Rochdale Envelope without providing any analysis or explanation to avoid addressing the matters raised. Please refer to the Planning Inspectorate's advice note (#9). This refers to the Government National Planning Policy Statement (NPS) on assessment of proposed developments.

AECOM fails to provide a viable 'project management plan for the development showing work within the scheme boundaries proposed. The three constituent parts<sup>1</sup> of the scheme

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<sup>1</sup> **Para 5.5** Part 1 - A4130 & Didcot Science Bridge, Part 2 - Didcot to Culham, Part 3 - Clifton Hampden Bypass.

are to be constructed simultaneously by separate contractors, starting in July 24 with the road opening to traffic in 2026. Three separate contractors will have to interface, yet there is no risk analysis to demonstrate how potential issues that are bound to arise will lead to escalation of costs and delays in completion of the project as a whole.

No evidence is provided that the work can be delivered in the 30-month timeframe suggested without any explanation for a 6-month delivery reduction.

AECOM recites previous submissions with a 'worse case 'of 36 months, amended to 35 months and now reduced to 30 months. This improvement in delivery timescale is not explained in their response.

We draw your attention to the Major Infrastructure Capital Programme information presented at Cabinet on 24 Jan 2023 as the "**Latest Forecast**" for HIF1 representing project expenditure and timings. This shows construction expenditure for project delivery from 2023-24 to 2026-27, a project timeline of 36 months and expected completion by Dec-26 (open to traffic).

		Latest Forecast					
Fig 1. Extract Infrastructure Capital Prog. Jan-23	Hist	2022/23	2023/24	2024/25	2025/26	2026/27	TOTAL
HIF Project	£'000s	£'000s	£'000s	£'000s	£'000s	£'000s	£'000s
Dualing A4130	2,918	750	4,300	10,800	13,900	832	33,500
Didcot Science Bridge	3,234	750	5,500	22,500	23,100	2,116	57,200
1. A4130 & Science Bridge	6,152	1,500	9,800	33,300	37,000	2,948	90,700
2. Didcot to Culham	6,373	1,400	10,500	60,000	73,500	8,227	160,000
3. Clifton Hampden Bypass	2,931	700	6,900	12,900	19,200	2,169	44,800
DGT OBC	637						637
	16,093	3,600	27,200	106,200	129,700	13,344	296,137
Annual %	5%	1%	9%	36%	44%	5%	100%

It is inconceivable that in just two months, the HIF1 scheme is now expected to complete six (6) months earlier than previously forecast. This new timeframe advised by AECOM is parsed into time periods and illustrated in Fig 2 below: -

Fig 2. Revised Project Time Line		Months	Cum Months	Orig. Cum Mths
2023-24	(1 Sep-23 to 31-Mar-24)			6
2024-25	(1 Jul-24 to 31-Mar-25)	9	9	15
2025-26	(1 Apr-25 to 31-Mar-26)	12	21	27
2026-27	(1 Apr-26 to 31-Dec-26)	9	30	36

No explanation is provided as to how this improved delivery can be achieved. The construction work for the £27M expenditure originally forecasted in 2023-24 will fall into a more compressed time period. This will allow 21 months to complete 95%<sup>2</sup> of construction work forecast by the funding deadline (31 Mar-26) leaving 9 months to finalise the project.

<sup>2</sup> £283M / £296M = 95% (£16M + £4M + £27M + £106M + £130M =£283M)

All work falling into this latter period will be at OCCs risk. The shorter time available means that work on the project is compacted thus increasing the risk of delivery failure with a back-loaded construction schedule (i.e. distribution of work skewed towards to end of the Project).

The revised timeline of 30 months seems to be driven by the government funding deadline and not by changes to underlying project fundamentals. What penalties will be built into contracts to ensure the taxpayer does not have to foot the bill for poor planning by the contractors?

AECOM invoke the Rochdale Envelope (RE), but does not state in the Environmental Statement (ES; as required) the nature of the uncertainties, and how the flexibility sought has been taken into account, nor why it is required? The RE is meant to apply where some details of the **whole** project have not been confirmed. It is not intended as a reason to avoid flexing the Project Plan because of a delay in the start date. Flexing project plans in MS Project or other planning tools is a normal project management task.

The Rochdale Envelope should not be used as an excuse (ref para 2.3 of the guidance) to avoid providing necessary information and timelines to make an assessment on a range of ES matters. It should not be used to mask an unexplained reduction in the project timeline (ref para 5.2).

The Reg 25 response should clarify which elements have been identified as uncertain and if the Rochdale Envelope applies to other documents or mitigations? We further note the caveat at para 5.4 which states that the ES has been prepared on best available knowledge at the time of writing. This suggests possible deficiencies and that the underlying information may not be a sound basis for decision making. The scale of the HIF1 project warrants a high degree of confidence that the scheme can be delivered on time to enable relevant assessments to be made.

A major project of this nature should contain a **risk analysis** with different scenarios across various probability ranges – P10, Pmean, P50 & P90 (low mean, mid and high). The applicant should produce an overall summary of the Project plan (ideally with a risk analysis profile) showing the work planned for each part of the scheme. This planning application must not be brought to committee until this is provided.

The decision by the Secretary of State<sup>3</sup> to hold a **Public Enquiry** into the Compulsory Purchase Orders and Side Road Orders for HIF1 introduces further uncertainty and pending the outcome will impact OCC's ability to assemble the necessary land required to start the project.

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<sup>3</sup> Letter from Secretary of State dated 8 June 23 to NPC-JC.

Given the scale of the Scheme, construction plans should be subject to a “cold eye review” by a reputable independent civil engineering company to benchmark and sense check the feasibility of the project plan. This should be undertaken prior to planning permission and not as a value engineering scoping review after the planning hearing.

This question (validity of plan) should be referred to AECOM to prove viability and ensure managers are not working to a schedule to fit an imposed completion deadline.

### **BASIS FOR REFUSAL**

1. AECOM's failure to demonstrate the validity and robustness of the construction programme, despite the Regulation 25 request, specifically asking for this. The applicant should be asked to provide a summary project plan fully risk assessed to show that HIF can realistically be delivered in full in the new reduced timeframe advised.
2. Failure to explain the 6-month improvement.
3. Invoking the Rochdale Envelope without explanation; contrary to policy and guidance. The delivery plan proposed is being driven by an imposed deadline and is unrealistic. The lack of information provided means the impact of the ES cannot be properly assessed.
4. The AECOM schedule of 30 months contradicts the capital programme approved by Cabinet and Council in Jan-23. The conflict between the published Cabinet Papers and the Reg 25 response requires explanation.

### **SECTION 2 - NOISE AND VIBRATION, VOLUME 1 CHAPTERS 10.**

The errors in the noise assessment remain. These major deficiencies as detailed in the NPC-JC objection report dated 5<sup>th</sup> May 2022 remain unanswered. The noise report in the Environmental Statement is an unsafe basis for granting planning approval to the HIF1 road scheme.

### **BASIS FOR REFUSAL**

1. The HIF1 Scheme remains non-compliant with local plan policies of the Vale of White Horse District Council and South Oxfordshire District Council.  
SODC Local Plan 2035 Policy ENV12 (3) and Local Plan Policy DES6  
VoWH Development Policy 23 Impact of Development on Amenity

These policies require that a development should not result in significant adverse impact on human health.

- 2 No adequate noise assessment has been undertaken to convincingly demonstrate that all significant adverse cumulative noise impacts to adjacent communities along the length of the proposed HIF1 road have been identified. Where significant adverse impact has been identified, such as at Appleford, the true extent of the severity has not been admitted and no alternative road alignment has been investigated to select the least harmful.
3. The HIF1 scheme fails to meet the requirements of national planning policy and guidance.
  - (a). The scheme does not meet the requirement of National Planning Policy Framework (NPPF) at paragraph 185 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’  
  
Note: Significant Observed Adverse Effect Level (SOAEL) is likely to cause material change in behaviours, attitude, or other physiological responses where the quality of life is diminished where there is a change to the acoustic character of the area.
  - (b). 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 in the ES and to its alignment to ensure a balanced transport provision with least impact on existing communities.
  - (c). 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”.
  - (d). 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”

- (e). 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.

## **2 RESPONSE TO APPLICANTS ADDITIONAL COMMENTS**

A specific response, to the additional comments provided by the applicant in the revised (April 2023) issue of the noise report, is provided below.

The noise assessment is flawed and misrepresents the noise impact of the operation of the road.

- 2.1 It is based on traffic modelling that fails to recognise “induced” traffic, i.e., additional vehicles attracted by a fast new highway and is based on the false premise that in the absence of the new HIF1 road the predicted traffic will use village roads and thereby increase traffic noise in the villages. This ignores the HGV and traffic restraints already present on village roads and anticipated wider traffic reduction measures introduced by OCC and others to encourage alternative transport. To support the road proposal the noise assessment underestimates the noise impact of the proposed road and overestimates the traffic noise in residential communities if the road is not built.
- 2.2 No further noise monitoring at critical locations has been undertaken since the absence of representative ambient noise levels was pointed out in by NPC-JC in May 2022.
- 2.3 The noise report fails to emphasize the increased traffic noise that will be generated by the scheme, for properties at the eastern end of the proposed route. Para 10.10.644 in describing the significant increase in noise for properties along the B4015 up to the Golden Balls Roundabout, dismiss it as “remote from the scheme” and “due to anticipated traffic growth on the B4015 from other developments in the area, not the scheme directly”. The assessment fails to acknowledge the encouragement that a new fast highway and HGV or LGV route linked to the A34, will have at the eastern end joining the B4015 at the existing road network. The detrimental noise effect, as this traffic passes through the middle of the village of Nuneham Courtenay en

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<sup>4</sup> Environmental Statement Vol 1 Chapter 10 Noise and Vibration revised Apr 2023

route to Oxford, is ignored. There is no provision in this scheme to assess and ameliorate the impacts on such noise damaged communities.

- 2.4 The noise report para 10.10.65 wrongly asserts that “it is considered that the first NPSE aims to avoid exceedances of the SOAEL as a result of the scheme within the context of sustainable development has been met”. Furthermore, proposed mitigation measures such as 3m noise barriers mounted on 8m high bridge parapets at Appleford, will block residential outlooks and when applied to the bridge crossing the Thames and north of Clifton Hampden will compromise landscape amenity. The scheme fails the 2nd aim of the NPSE.
- 2.5 The noise report at para 10.10.68 & 10.10.69 in the revision of April 2023 now acknowledges that more than 20 properties in Appleford close to the proposed road alignment will suffer an increase in road noise which will not be adequately mitigated. However, the assessment underestimates the increased effect of HIF1 road noise by overestimating the reduction in predicted traffic through Appleford due to the HIF1 road.
- 2.6 Moreover the noise assessment fails to assess the noise impact of forming a tunnel bridge taking the proposed road over a commercial railway siding, directly facing dwellings in Appleford. The cumulative effect of noise from rail shunting, bridge reflection and funneling of train noise and superimposed road traffic has not been investigated. The reflection of rail noise back to dwelling from the noise barrier proposed as a parapet to the bridge has not been investigated. Comparison with noise generated by an alternative road alignment and bridge position has not been undertaken to determine the alignment with least noise impact.
- 2.7 British Standard BS 8233: 2014 ‘Sound Insulation and noise Reduction ’ recommends that “For traditional external areas that are used for amenity space, such as gardens and patios, it is desirable that the external noise level does not exceed 50 dB LAeq,T, with an upper guideline value of 55 dB LAeq,T which would be acceptable in noisier environments.” No attempt has been made to assess the total noise environment in Appleford in comparison to recommended limits.
- 2.8 No attempt has been made to assess the noise impact on dwellings comparing alternative road alignments to select a route with least impact on the existing communities, of Appleford, Clifton Hampden and Sutton Courtenay. There will also be a negative impact from traffic and noise on the A415 at the Europa School (Thame Lane).
- 2.9 Nor has any analysis been conducted on the feasibility of a controlled level crossing at the private rail sidings (which are private and not part the

Network Rail controlled system), thus avoiding the need to construct an elevated road and flyover bridge. On average no more than 3 trains per day access the sidings outside peak hours (often very early morning & late evening). It should be noted that the licence for receiving waste expires in 2030 when the landfill is due to close, albeit the gravel works will remain operational.

- 2.10 We challenge the assertion that traffic and related noise will decrease at Appleford Main Road or in Sutton Courtenay. Both the B4016 and Drayton Road will act as feeder routes to and from the new road. Appleford will be used by traffic from Ladygrove North and Long Wittenham for access and as a back road short cut.
- 2.11 We note the concerns of the Principal Major Planning Officer (Vale of WH DC) that consideration should be given to moving the road west. We reject any statements that damage to Appleford should be balanced with beneficial outcomes elsewhere.

### **SECTION 3 - LANDSCAPE & LIGHTING**

We support the comments by the Principal Major Planning Officer (Vale of WH) that acoustic barriers 2 or 3 meters in height are visually intrusive and that the area including the section Didcot to River Thames Crossing is rural in nature.

The scheme will have three major visual impacts that conflict with the character of the area and run counter to policy.

- 3.1 **The Science Bridge** will have a major visual impact on the local landscape. There is nothing distinct or appealing about its design or appearance.
- 3.2 The **Elevated Road and Flyover Bridge at Appleford** has a negative visual impact and is an unjustified imposition on the local community, including from the Wittenham Clumps which is set within an Area of Outstanding Natural Beauty (AONB) and is a site of Site of Special Scientific Interest (SSSI). It is visually intrusive and will bring additional noise and vibration to the local area, with light spill from moving traffic polluting local dark skies. The road will overlook the village and is physically too close to resident dwellings. It will be damaging to human health and wellbeing (mentally and physically).
- 3.3 The **Double Roundabout** at Culham Science Centre is not appropriate to a country area and will change the whole character of the surrounding locality.



## **BASIS FOR REFUSAL**

1. National Planning Policy Framework (NPPF) requires that decisions should ensure “a new development is appropriate to its location taking into account the likely effects including cumulative effects of pollution, on health, living conditions and the environment”.
2. The visual impact of the Science Bridge, elevated road Flyover Bridge at Appleford and Double roundabout at Clifton Hampden, which all suffer from poor design<sup>5</sup>, will change the nature and character of localities along the route of the road from a rural country area to a sub-urban if not an urban district.
3. The proximity of the elevated road and flyover at Appleford village is not appropriate for a small village and it will be physically damaging to the health and well being of residents contrary to NPSE and NPPF policy.
4. The removal of trees and loss of hedgerow (see below) will change the character and visual outlook of the area permanently.

## **SECTION 4 – MITIGATION**

It is not possible to mitigate against the impact of traffic noise in various locations acknowledged as “significant adverse”. These are detrimental to the health and wellbeing of residents and cannot be mitigated to within tolerable limits.

## **BASIS FOR REFUSAL**

1. Mitigation does not remove the harmful effects (noise, air quality, light intrusion) of the HIF1 road and cannot avoid the negative health outcomes arising from the scheme.
2. Significant adverse (and constant) noise levels anticipated in various locations cannot be effectively mitigated or balanced against claimed benefits elsewhere. The health and wellbeing of residents is not a commodity that can be ethically traded for benefit elsewhere!

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<sup>5</sup> See comments on design by the Principal Major Planning Officer (Vale of White Horse District Council).

## **SECTION 5 – ABORICULTURE**

- 5.1 The HIF1 scheme requires an area of 155 hectares (383 acres). This is the equivalent to the loss of over 200 football pitches removed from the natural environment to be given over to road use. There is a discrepancy between the area quoted in the planning application dated 4 Oct 2021 (155 hectares) and the CPO information (127 hectares) published some months ago. This should be explained.
- 5.2 The biodiversity and environmental impact from tree loss is significant, particularly in Clifton Hampden, and to a lesser extent at Appleford. In total circa three (3) miles of hedgerow will be lost along the nine- mile length of the road.

Fig 1 below illustrates the extent of the tree loss which cannot be minimised.

<b>Fig 1 - Trees &amp; Hedgerows to be removed</b>	<b>Trees, T Groups &amp; Hedgerows</b>	<b>Removed HIF1</b>	<b>Removed %</b>	<b>A4130 &amp; Didcot to Clifton</b>		
				<b>Sc Bridge</b>	<b>Culham</b>	<b>Hampden</b>
Individual trees	457	169	37%	14	21	134
Tree groups	228	98	43%	32	33	24
Hedges	40	14	35%			
Woodlands	3	2	67%			
Tree features	728	283	39%			

Note: Partial groups combined with Groups in removals.

Excludes 8 low quality tress (Cat U)

- 5.3 The analysis at Fig 1 is based on the original Table 5 & does not include the 5 trees with TPOs now saved. This is laudable but the effect is marginal and does not change the overall impact. We cannot see ref. to G318 & G327 which appears to conflict with para 8.2 (No trees subject to TPO will be removed).
- 5.4 Eighty (80%) of the tree loss due to the HIF1 scheme will be in Clifton Hamden that will change the landscape and natural character of the village. In Appleford 33% of tree groups (incl. 2 partial woodlands) will be lost.
- 5.5 The impact on biodiversity along with the visual impact of the tree, hedgerow and canopy loss will denude the landscape and change the nature of the area forever.
- 5.6 We cannot understand how the loss of 383 acres for road use along with the loss of so many trees and hedgerow can result in a biodiversity net gain as claimed by AECOM.

## **BASIS FOR REFUSAL**

1. The loss of 383 acres to the natural environment for road use coupled with significant removal of trees (160+), tree canopy (30%) and hedgerow (3 miles) with

the consequent impact on biodiversity is significant. No amount of replanting can repair the damage to the environment and climate.

(Note. Landfill areas also contain a rich resource of wildlife and biodiversity which should not be overlooked!)

## **SECTION 6 - LOCATION & DESIGN OF BRIDGE OVER APPLEFORD SIDINGS**

- 6.1 NPC-JC objects to the location and design of the bridge at Appleford Sidings. This section provides NPC-JC's response to the Memo issued by AECOM on 13<sup>th</sup> April 2023 to OCC Development Management in relation to Appleford Siding Bridge.
- 6.2 The AECOM memo responds to the question put by OCC planning officer "Please provide a non-technical explanation of why the extended deck area is required for the proposed Appleford Sidings bridge and further information about alternative designs that were considered and the reasons they were discounted."
- 6.3 On 20th January 2023 NPC-JC replied to the regulation 25 response issued by OCC on 13<sup>th</sup> November 2022 on the bridge, road design and landscaping.

NPC-JC's January 2023 report describes the deficiencies of the bridge design that fails to achieve the objectives of the National Planning Policy Framework (NPPF) paragraph 126 (quality & engagement) and paragraph 157 (mitigating climate change).

- 6.4 Paragraph 134 of the NPPF applies to this bridge design; "Development that is not well designed should be refused".
- 6.5 The Vale of White Horse DC planning team, in a response of 22 December 2022 stated that the poor design of the 3 bridges in the scheme runs contrary to paragraph 126, 130, & 131 of the NPPF and contrary to core policies 37, 44, of the local plan 2031 part 1 and the Didcot Garden Town Delivery Plan.
- 6.6 The details of the failure of the location and design of the HFI road bridge over Appleford rail sidings remain as cited in NPC-JC's January 2023 report. AECOM's memo of 13th April 2023 fails to address the serious consequences of the location and design defects.

### **6.7 SUMMARY OF DEFECTS IN BRIDGE POSITION AND DESIGN**

- 6.7.1 The HIF1 road and bridge is located adjacent to a Noise Action Plan Important Area, identified by DEFRA as a location already suffering excessive noise and which should be avoided. OCC's duty is to seek to reduce noise impact. The

HIF1 scheme and bridge will do the opposite by increasing noise well above tolerable thresholds at this location.

- 6.7.2 The structure is within 60m of the nearest dwellings in Appleford. The tunnel design and noise reflecting concrete surfaces will focus siding rail noise on these dwellings. The noise implications of the combination of rail noise, bridge reflection, and superimposed HIF1 traffic noise have not been investigated by the applicant.
- 6.7.3 To attempt to mitigate the HIF1 traffic noise a 3m high noise barrier is proposed on top of the bridge parapet. No investigation has been undertaken of the inevitable reflection, from this barrier towards these dwellings, of rail noise from Appleford sidings and main line rail traffic. The sidings branch and main line lie between the proposed bridge and the dwellings.
- 6.7.4 The concrete structure topped with a noise barrier more than 10m above adjacent gardens will dominate the western outlook and skyline of the adjacent dwellings, and be seen from local landmarks, such as the Wittenham clumps.
- 6.7.5 The skewed inefficient bridge structure is wasteful in materials, with large areas of redundant concrete deck. This design results in excessive CO<sub>2</sub> consequences and is excessive in scale adding to its intrusive and unsightly appearance.

## **ALTERNATIVE ALIGNMENT**

- 6.8 The planning team of the Vale of White Horse DC state that due to the fact that “residents of affected dwellings will experience significant adverse effects despite acoustic barriers” and “the visually intrusive appearance of the acoustic barriers, consideration should be given to moving the road further west.”
- 6.9 A viable alternative road alignment further west, for the road and bridge over Appleford Sidings is available, see figure 1. This alignment would not require a skewed bridge design which would result in a more efficient smaller bridge structure. The road’s further distance away from dwellings in Appleford would reduce the noise impact and provide the offset distance for other landscape-based noise attenuation. A comparison of noise environment of both alignments need to be undertaken to allow a selection of the route alignment that minimises the noise impact on nearby dwellings.

See Fig 1 below.

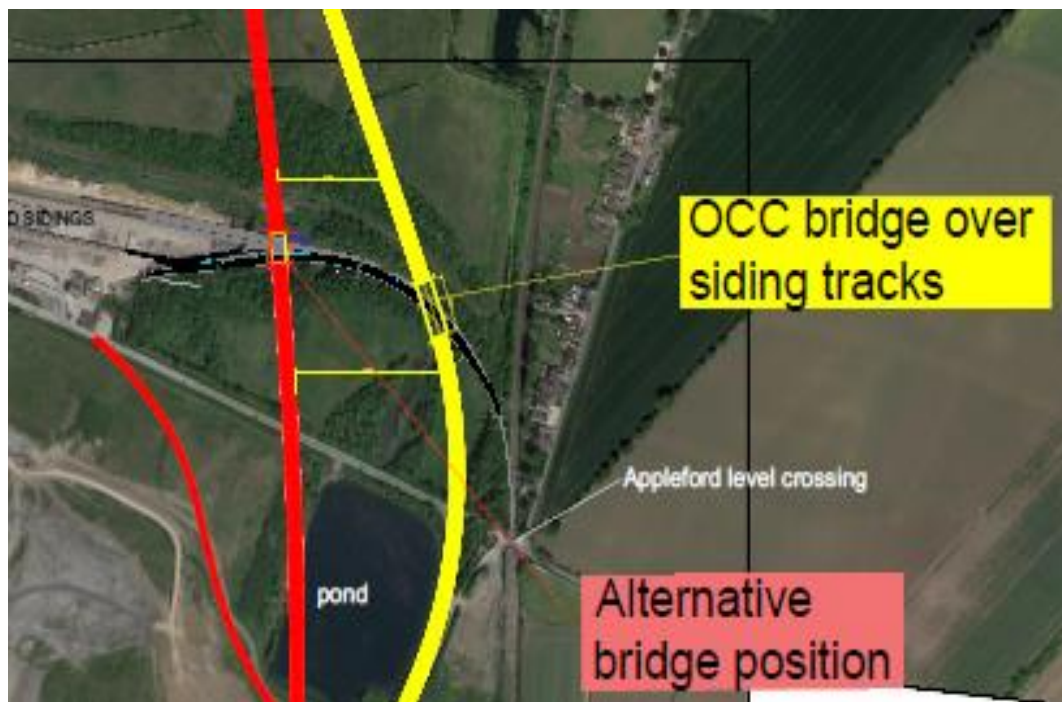


Figure 1 plan illustration of alternative position (in red) for HIF1 road and bridge crossing Appleford rail sidings.

#### **BASIS FOR REFUSAL**

1. The existing bridge proposal must be refused as Paragraph 134 of the NPPF.
2. No planning approval for the HIF1 scheme can be granted until a further analysis is undertaken on road and bridge alignment as part of a consultation exercise with affected residents.

## **SECTION 7 - CLIMATE EMISSIONS**

- 7.1 The predicted CO<sub>2</sub> emissions resulting from the construction and operation of the HIF1 scheme are contained in the Environmental Statement (ES) Vol 1 Chapter 15, September 2021, with subsequent Regulation 25 responses.
- 7.2 OCC Environment Team commissioned a review of these documents by SNC-Lavalin/Atkins, dated 15<sup>th</sup> February 2023.
- 7.3 A significant conclusion within the ES is that there will be a reduction in operational CO<sub>2</sub> emissions if the HIF1 road is built due to reduction in traffic congestion and journey times. This statement is based on flawed assumptions.
- 7.4 A summary of the defects in this assessment was issued to the Planning Department on 19th January 2023 by Friends of the Earth as a response to R3.0138/21. This cites the detailed analysis contained in the report, dated January 2023, "THE HIF1 road proposal; is this plan compatible with Oxfordshire goals?".
- 7.5 This remains the most accurate and comprehensive assessment of the flaws in the ES statement on CO<sub>2</sub> emissions, briefly summarised as:
  - 7.5.1 The traffic modelling fails to account for induced demand caused by the HIF1 road. As new roads encourage more car dependent urban developments, this increased car use leads to an increase in carbon emissions.
  - 7.5.2 The traffic modelling assumes that traffic increases on existing roads, without HIF1, will rise at the same rate, leading to congestion. This ignores the evidence base that driver behaviour, traffic management, public transport will modify predicted congestion.
- 7.6 The ES overestimates the level of congestion without the Scheme and overestimates the improvement in congestion with the Scheme. It therefore overestimates the potential carbon savings from reduced congestion. Using best available data, the operation of the HIF1 scheme would lead to increases in carbon emissions estimated at 359kt CO<sub>2</sub> by 2050.
- 7.7 It is also clear that the cited benefit in traffic flow will not be realised. This is recognised in OCCs LTCP "However, we have found that road schemes often generate new demand and quickly reach capacity again. It is therefore not a sustainable long-term solution for Oxfordshire's transport network."
- 7.8 The HIF1 is an unsuitable solution to enable long-term sustainable housing growth in South Oxfordshire.

## **BASIS FOR REFUSAL**

The ES is an unsafe assessment of the carbon emissions of this scheme. The carbon emission predicted to be produced by the HIF1 Scheme are incompatible with:

1. OCC's Local Transport and Connectivity Plan 2022-2050 policy 27
2. National Planning Policy Framework chapter 14 paragraph 152 and Planning Policy Guidance paragraph 001.
3. The Climate Change Act 2008 amended 2019 and The Climate Action Plans of VoWHDC 2022-2024 and SODC 2022-2024.
4. VOWHDC local plan 2031 core policy 43 Natural resources and core policy 40 sustainable design and construction
5. SODC policies DES 7- Efficient use of resources and DES 8-Promoting sustainable design.

## **CONCLUSION**

The EIA Regulation Response (April 23) fails to provide sufficient clarification on the matters raised and for the reasons outlined above and other objections submitted previously the HIF1 application should not be approved.

NPC-JC continue to question the validity of the traffic assessment which ignores induced demand and has scoped out the impact on key locations such as Milton A34 junction and hinterland on the western side, Drayton Road / Sutton Courtenay, A415 and Abingdon, and Nuneham Courtenay / A4074.

AECOM fails to prove the validity of the proposed Construction Programme as requested. There is no explanation to justify the 6-month reduction in the delivery schedule. The failure to provide a summary Project plan (3 Parts) is a major omission. Moreover, the use of the Rochdale Envelope without explanation or analysis is contrary to government policy and guidance. The discrepancy between AECOMs 30-month plan (for the largest development undertaken by OCC) and the Capital Programme requires explanation.

The HIF1 scheme remains non-compliant with national planning policies including NPPF & NPSE and a raft of local policies (Vale & SODC). The standout features – Science Bridge, Flyover at Appleford and Double roundabout are not suitable for their locations and will change the character of the area (Appleford & Clifton Hampden) from country to urban.

Mitigation at key pinch points is inadequate and will not reduce the traffic noise (understated in the ES). The design and location do nothing to add to the quality of life for residents as required by NPPF. Significant adverse impacts will detract from the quality of life and enjoyment of homes and gardens.

The loss of trees, tree canopy, hedgerow and land taken from the natural environment for road space will damage the biodiversity permanently. We cannot see any basis for a net gain as claimed. Climate damage is understated (benefits overstated). The plan runs counter to OCCs adopted LTCP policies and will fail to achieve a reduction in car usage (1 in 4 trips by 2030 & 1 in 3 by 2040).

There are too many flaws and deficiencies in the HIF1 application, and it should be rejected.

Sincerely

A handwritten signature in black ink, appearing to read 'Greg O'Broin', is written over a horizontal line.

Greg O'Broin (chair)  
Neighbouring Parish Council Joint Committee

On behalf of:

Appleford-on-Thames Parish Council  
Culham Parish Council  
Sutton Courtenay Parish Council  
Burcot & Clifton Hampden Parish Council  
Nuneham Courtenay Parish Council