

## Claire James

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**From:** Gregory O'Broin <applefordpcworkinggroup@gmail.com>  
**Sent:** 03 October 2023 20:48  
**To:** Skinner, Helen  
**Cc:** Palmer, Leanne  
**Subject:** Re: Reference: APP/U3100/V/23/3326625. (R3.0138/21 - HIF1 Call-in)

Helen

Thank you for your prompt reply.

Can you please note and list as interested parties:-

- (a) The Neighbouring Parish Council Joint Committee (NPC-JC) and
- (b) Appleford-on-Thames Parish Council,

The Parish Councils of Sutton Courtenay, Culham, Burcot & Clifton Hampden, and Nuneham Courtenay represented by NPC-JC above may subject to formal confirmation from them seek to be similarly listed.

Subject to sight of Oxfordshire County Council's (OCC) Statement of Case due 27 Oct our provisional outline representations and comments are:-

### Provisional Outline Representation to reject HIF1

1. The Officers Reports (planning application & extraordinary meeting 27 Sep) are defective and fail to show an impartial objective assessment (refs. to government funding £240M, expressions such as 'unique opportunity' and 'essential' and judgements made on material considerations). The ORs are unsatisfactory and demonstrate inherent bias in favour of HIF1, overlooking non-compliances with NPPF.

2. The eight material planning reasons for refusal listed in the minutes of the planning meeting dated 17 & 18 Jul remain valid and unchanged.

2.1 Failure to take into account the Climate Change Committee Report to Parliament 2023.

2.2 Lack of "very special circumstances" for a development breaching the Green Belt.

2.3 Inadequate Traffic Modelling based on old data (2016) which ignores "induce demand" contrary to all empirical evidence.

The Paramics model does not take into account many factors that affect road usage - demographic assumptions, economic factors, cost of fuel, availability / quality / cost of public transport, speed limits and induced traffic.

The scheme and traffic model was heavily criticised by Prof. Phil Goodwin, Emeritus Professor of Transport Policy at University College London.

The lack of any traffic assessment on Abingdon and Didcot noted in the minutes but also Sutton Courtenay (Drayton Road), and particularly B4015 leading to Golden Balls / Nuneham Courtenay.

There is no justification for scoping out a number of key areas from the analysis. In summary the traffic modelling is deeply flawed and unreliable.

2.4 The impact on Appleford Village, not only noise (SOAEL - damaging to health & more than 19 dwelling) but a 50ft flyover overlooking the village and damaging to the landscape.

2.5 The absence of a Health Impact Assessment - in breach of policy 9 of LTCP.

2.6 Harm to Landscape at Appleford, Clifton Hampden where the landscape outlook will be changed with the loss of 283 tree features (incl. 169 mature trees, 98 tree groups, a third (35%) of hedgerows and two woodlands). In addition over 300 acres will be lost to the natural environment.

Visual impact and harm to the wetlands and riparian environment with potential flood impact at the Thames crossing or up stream.

2.7 Poor design of the Science bridge as a gateway feature to Didcot and noted by the Vale of White Horse DC. Other elements suffer from poor design (e.g. flyover at Appleford).

2.8 Conflict with Oxfordshire County Council's Local Transport and Connectivity Plan (LTCP). This is a material consideration for a major highway development.

Note. The above is not an exhaustive list of all the reasons the development is deficient.

3. Para 7 of the Secretary of State's letter dated 25 July-23.

HIF1 is a flawed scheme which will lead to more congestion, slower average speeds, greater climate and carbon reduction challenges and will not deliver long term sustainable outcomes to support housing or employment and satisfy these requirements.

#### Case Management Conference

Given NPC-JC's involvement at every stage in the planning process and that we represent five parish councils and affected residents along the route, we request an invitation to the Case Management Conference on 9 Nov.

#### Umbrella Group

We are exploring collaboration with a range of interested parties viz, Oxfordshire Roads Action Alliance, NPC-JC, individual parish councils, Oxford Friends of the Earth, POETS Group and others.

We are also exploring possible registration under Rules 6 subject to funding availability and ask that we are given sufficient time to explore this and to respond to the Statement of Case submissions on 27 Oct.

Can I point out that the recent Extraordinary Planning & Reg. Committee meeting on 27 Sept (last Wed) has changed the context and direction it is taking on this call-in?

We ask for some leeway to explore the above collaboration in the circumstances.

Regards

Greg O'Broin  
Appleford-on-Thames Parish Council (Chair), and  
Neighbouring Parish Council Joint Committee (Chair)  
M. 07768 490 277

On Tue, 3 Oct 2023 at 14:42, Skinner, Helen <[HELEN.SKINNER@planninginspectorate.gov.uk](mailto:HELEN.SKINNER@planninginspectorate.gov.uk)> wrote:

Dear Greg,

I can confirm the new inquiry opening date is 20 Feb 2024.

The interested part deadline is unchanged (4<sup>th</sup> October) but comments received after this will be accepted.

The council's Statements of Case are due by 27<sup>th</sup> October.

Kind regards

Helen