

CORRIDOR BETWEEN THE A34 MILTON  
INTERCHANGE

AND THE B4015 NORTH OF CLIFTON  
HAMPDEN

CASE REF:APP/U3100/V/23/3326625

SUMMARY

PROOF OF EVIDENCE OF

RICHARD TAMPLIN

30 JANUARY 2024

**Planning Application Case Ref  
APP/U3100/V/23/3326625**

**Proposed Construction of Roads and Bridges Between  
the A34 Milton Interchange and the B4105 at Clifton  
Hampden by Oxfordshire County Council**

**Summary Proof of Richard Tamplin for POETS**

1. The Environmental Statement (ES) is fatally flawed in its current form because, firstly, it fails to deal with the significant environmental effects of the application on a range of issues arising from its failure to assess the significant environmental effects of HIF1 on the Town Centre of Abingdon. This is despite HIF1 being within 3km of that town centre of its closest point on the only road between those two points.
2. Secondly, the ES fails to consider reasonable, realistic, alternative options, as required by the EIA Regulations 2017. Judgments of UK Courts and the European Court of Justice demonstrate that not only are such assessments required in an ES, but that failure to do so renders its accompanying application open to challenge if permission for that application were to be granted.
3. Thirdly, in this case there are existing realistic and reasonable alternatives to what is proposed by this application, which could and should be adopted in preference to those in the application. This is because the Applicant has failed to approach the claimed requirement for infrastructure to address the traffic congestion and delay to all road

vehicles by generating a sustainable transport system as an alternative to road building.

4. The proposed construction of HIF1 fails to follow Policy 36 of the County Council's recently adopted LTCP which requires the Highway Authority as Applicant in this case to adopt road capacity schemes only when all other options have been considered. No evidence of that test being applied to HIF1 has been provided in this application.
5. This proposal is a result of using the discredited 'predict and provide' approach to transport planning in and around Didcot, instead of the adopted 'decide and provide' approach required by the LTCP. The former is based on historic levels of traffic growth which assumes that this will continue, with only a marginal allowance for any variation of this historic trajectory. By contrast, 'decide and provide' is based on an approach by first deciding what should be the preferred future situation and then providing the means to work towards that future in a manner which can accommodate uncertainty.
6. This is especially necessary in the present national and international context of climate challenge and the advice and guidance of the respected organisations monitoring the climate and recommending changes to policy and implementation of counter measures. The UK planning system has been too low in its response to the increasingly urgent need to develop and implement such measures, though there are some signs locally that this historic but presently ineffective system may be moving towards the necessary changes.
7. In addition, interference by Government in the past has had a seriously detrimental effect on the planning process locally, with the imposition of housing targets on locally determined and assessed housebuilding needs. This has, in conjunction with the use of the 'predict and provide' approach to transport issues and planning in this part of Oxfordshire, led to this unnecessary road-based proposal which is extremely expensive, inflexible, unsustainable and contrary to new policy in government locally and nationally. It is also infeasible given its cost and the limited time available to implement it before Government funding ceases, even if permission was to be granted.

8. The proof shows that a sustainable transport for the Science Vale area of the County is possible, using a simple logical approach to planning, including transport planning locally. This could use the important potentially low carbon resource of the Didcot to Oxford passenger and freight rail line serving the existing stations of Didcot Parkway, Appleford, Culham and Radley. This system could be improved to provide higher frequency passenger services during a longer availability by measures to improve line capacity and provision of park and ride provision at one station at least. This alone could leave to significant modal shift from road to rail in this area.
9. This suggested alternative could also be flexible by being provided instead via high-speed bus services between Didcot and central Oxford using lower cost, lighter structures for a Thames crossing, and for the viaduct and bridge south to Appleford Sidings, on which bus access only would be possible. This could be implemented via a wider Thames bridge over the river where the railway crosses the river. It could also use a different route also serving the four stations mentioned above using a segregated busway system in part.
10. At a second level of sustainable transport, each local station could be a base service hub for more frequent, smaller and more adaptable, buses to link with the nearby villages using existing roads. This can be implemented within months of being agreed between bus operators and the County Council and would need little capital investment beyond secure cycle parking at stations. A variant could also provide car park and ride option, for example at Radley Station using the current general car parking provision. A further sustainable option could use the existing track bed of the former Abingdon – Radley branch line along most of its route to a point close to Abingdon town centre where buses would rejoin the existing road. This would enable a higher frequency and more reliable service to serve Abingdon using some of the existing roads there such as the Ring Road.
11. Finally, the provision of active travel in its purest form could be a new cycleway and footway around the entire area of Science Vale. This could be largely segregated from highways by constructing simple, light pavements or using existing resurfaced laneways at very little cost. This system would of course have to feel safe and secure to users, but this

can be ensured using well-known design principles of overlooking by dwellings and areas of frequent pedestrian activity; some would remain alongside or close to existing minor roads but this would retain the advantage of being part of a system linking stations with residential areas, places of employment, local shops and town centres, sport and recreation provision and similar.

12. These alternative sustainable transport suggestions offer a realistic alternative to the discredited, outdated, end-state planning proposal of HIF1 and would be far more beneficial to the whole population of this part of southern Oxfordshire. This I hope would be recognised by both the Inspector and the Secretary of State, and should therefore lead to refusal of the HIF1 planning application.

Richard Tamplin

25 January 2024