

CORRIDOR BETWEEN THE A34 MILTON
INTERCHANGE

AND THE B4015 NORTH OF CLIFTON
HAMPDEN

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

PROOF OF EVIDENCE OF

RICHARD TAMPLIN

30 JANUARY 2024

1. Preface

1.1 Proof of Evidence of Richard Tamplin on behalf of POETS

This proof of evidence is submitted as being my professional opinion on the issues raised by the development subject of this Inquiry and is made on behalf of POETS¹, a group of professional land use and transport planners living in Oxfordshire, all of whom have many years' experience in those fields.

1.2 Personal Expertise and Experience

My qualifications are an Honours Degree in Land Use Studies from Newcastle University (1968), Membership of the RTPI from 1970 (retiring in 2012), and a Diploma in Conservation Studies from York University (1979). During my career I have gained expertise in local planning, development management, heritage, minerals and waste, archaeology, energy, enforcement and environmental assessment. I am generally familiar with southern Oxfordshire.

2. Introduction

2.1 My evidence is in three parts, namely that: -

- a. 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, and secondly, it fails to consider reasonable, realistic, alternative options, as required by the EIA Regulations 2017;
- b. that current circumstances require an urgent, radical response to the issues of the area proposed to be served by the application proposals and this is not provided by those proposals, and
- c. 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.

2.2 I am not surprised at what has been proposed in this application. It has been put forward by the Applicant as Highway Authority, whose main purpose

¹ Planning Oxfordshire's Environment and Transport Sustainably

is to provide safe and convenient highways for all forms of transport and to maintain them in good working order. Responsibilities for considering and providing alternatives to highway provision have, in recent years, been bolted onto this core purpose. This unfortunately has given rise to conflicting aims and objectives which, in an era of financial constraint, has made the reconciliation of those responsibilities increasingly difficult. Against this background, and given the large sum made available by Government to fund most (though not all) of the cost of these proposals, this situation has unfortunately led to the adoption of a road-only application.

SECTION 3 (A)

ENVIRONMENTAL STATEMENT

NO TOPIC IDENTIFIED

3. A. The Accompanying Environmental Statement

3.1 I do not intend to repeat what I wrote on behalf of POETS to the County Council's Planning & Regulation Committee in July 2023 and my Request to the Inspector at the Case Management Conference to issue a Regulation 25 request to the Applicant, November 2023. These are attached as Appendix A, and explain why the ES is fatally flawed². I add clarification here to Appendices B - D, a judgment of the European Court of Justice and two Court of Appeal judgments, all of which support my arguments. Firstly, in *Holohan and others and An Bord Pleanala [2018], Case C -461/17*, paras 10 – 16 and 56 – 69 and rulings 4 and 5, (*Holohan*)³ it is clear that the EIA Directive, and hence the UK EIA Regulations 2017, apply not only to protected species (as was the situation in that case), but to all significant effects of any development covered by Directive 2011/92/EU (The EIA Directive). This results in two conclusions, one arising from Ruling 4 and one from Ruling 5 of *Holohan*.

3.2 Firstly in terms of Ruling 4, the assessment of the effects of an EIA development project, as is HIF1, on the environment means the developer (in this case Highway Authority) is obliged to supply information that expressly addresses the significant effects of its project. By failing to assess those effects on Abingdon town centre, the core of a town of similar size to Didcot (around 32,000 people), the ES is seriously deficient. My colleague Roger Williams reaches similar conclusions in relation to the failure to assess the significant effects of HIF1 on the environment at its eastern end, as does Roger Turnbull in his evidence in relation to those effects on the area west of the Milton

² Appendix A, Statement to OCC Planning and Regulation Committee, 17 & 18 July 2023 and Request to Inspector to issue a Regulation 25 Letter to the Applicant, 8 November 2023

³ Appendix B, ECJ Judgment, *Holohan and Others*, 2018

Interchange along the A417 towards Wantage. I therefore adopt their conclusions on this matter and consider they reinforce those I have made.

3.3 An ES must assess, not only the effects of the scheme to construct the HIF1 road, but also the effects of its use. (Regulations 4(2) and 18(3) and Schedule 4) Though Abingdon town centre is beyond the construction site itself, it lies on the same A415 Witney to Berinsfield road, on part of which HIF1 would lie, beyond the proposed roundabout near Zouch Farm, where HIF1 turns south towards Didcot, the A415. At that point any driver going towards Abingdon, apart from those relatively few going to Culham village, a few isolated dwellings, or car parks and sports pitches south of Abingdon Bridge, has no choice but to pass through Abingdon town centre and its gyratory road system. The traffic already carried by the A415 already has significant environmental effects on the town centre. But additional traffic on this part of the A415 between Abingdon, Didcot and between Abingdon and Culham Campus would, in the event of HIF1 being permitted, be increased due to the traffic this new road would generate and induce to serve development of the proposed Culham housing site of 3,500 dwellings, the development of Culham Campus, and the substantial proposed new housing and employment sites in Didcot and Milton Park.

3.4 Yet no environmental assessment has been made of this substantially changed situation in the ES. Similar, but quantitatively and qualitatively different, effects would occur if HIF1 is constructed, beyond its planned end north of Culham Campus, both towards and beyond the Golden Balls junction with the A4074 Oxford to Reading road. The need for such assessment of the indirect effects of HIF1 is shown both by the Regulations and by the judgment in the High Court case of *R (oao Sarah Finch and Others) and Surrey CC [2022] EWCA Civ 187 and Others*⁴, where Lindblom, President of the Court, explains the correct understanding of the environmental assessment process in paragraphs 5 to 15, and especially paragraphs 15(3) and (6). In turn, from paragraph 15(6), the referenced judgment in *R (oao Squire) v Shropshire CC [2019] EWCA Civ 888*⁵, shows that a failure to carry out environmental assessment of relevant indirect effects leads to a conclusion that the application itself is unlawful and should be quashed. This latter judgment reflects the provisions of Regulation 3 of the EIA Regulations 2017, which was drawn to the attention of the Planning

⁴ Appendix C, EWCA Judgment, oao Sarah Finch, 2022

⁵ Appendix D, EWCA, Judgment, oao Squire, 2019

& Regulation Committee at their meeting of 17 and 18 July, and which applies today. In fairness, I note that *Sarah Finch* has been appealed to the Supreme Court and that judgment is awaited⁶.

3.5 Secondly, in terms of Ruling 5 of *Holohan*, it is clear that the developer **must** (my emphasis) supply information in relation to the environmental impact of both the chosen option and of all the main alternatives studied by him, together with the reasons for his choice, taking into account at least the environmental effects, even if such an alternative was rejected at an early stage. This Ruling was, in effect, transposed into the UK 2017 EIA Regulations by Regulations 4 and 18(3) and Schedule 4, and therefore applies to this application and its accompanying ES. Again, the conclusion I draw from the Applicant's failure to carry out an early and full assessment of the significant environmental effects of, not just HIF1, but also of all the alternatives studied during the analysis of the project, was contrary to the purposes of the EIA Directive and the requirements of the Regulations. Consequently, this failure rendered the ES unlawful and the application must be refused (Regulation 3) or be open to challenge.

3.6 Neither of these implications of the *Holohan* on the lawfulness of the ES and hence of the application itself have been rectified since the application was called-in by the Minister. In this situation, unless the Inspector acting in place of the Minister issues a request under Regulation 25 of the 2017 Regulations for the Applicant to rectify these omissions or, failing that, the Applicant withdraws the application, then any recommendation by the Inspector, or decision of the Minister, to approve the application would in my view remain open to challenge in the Courts.

⁶ Ref Code ID, UKSC 2022/0064

SECTION 4 (B)

POLICY CONTEXT TO HIF1

TOPIC 14

4. B. The Current Context to HIF1

4.1 HIF1 has a long planning history, dating back to at least as early as 2014. It has been described correctly by a former OCC Cabinet Member for Transport as “a legacy scheme”, given its progress in almost unaltered form since then. But it is incorporated into a development planning system which operates today in precisely the same ongoing manner as it has since 1947, resting on historic data, historic concepts and historic preconceptions.

4.2 There have been attempts to “speed up” this process since at least 1974, when the Dobry Report⁷ examined the then development plan system, but to little avail. Similar considerations apply to the glacially slow recognition and response to those causes of climate change which are within the power of national and local land use and transport planning management. The contradictions between the effects of ever-increasing car ownership and the desire to live environmentally civilised lives was recognised by Government as early as 1963 in its acceptance of the recommendations of the Buchanan Report⁸.

4.3 Today such delay and reliance on an anachronistic system to deal with current real-world issues is no longer just frustrating but dangerous. The Climate Change Act 2008 is the best-known legislation implementing Government recognition of the increasingly urgent need to combat climate change since the Kyoto Conference (COP3) of 1997. In parallel, the need for

⁷ Review of the development control system in England, George Dobry QC, HMSO, December 1973

⁸ Traffic in Towns, Report of the Steering Committee, Colin Buchanan, HMSO 1963

international action to promote sustainable development arising from the Brundtland Report of 1987, is recognised by the NPPF.

4.4 It is 25 years since Kyoto and 35 years since the Brundtland Report; progress in line with the aims of both has been painfully slow. Meanwhile, climate change has increased and accelerated. I believe that in England the nature of the current planning system is an obstacle, not an opportunity, to achieving sustainable development goals and combat climate change effectively. A new, radical approach to the production of plans and the assessment of proposals is required now, applied immediately to all development proposals, and most importantly of all, implemented in any new development.

4.5 Three more recent events reinforce my conclusion. The first was the financial ‘crash’ of 2007-8, which led to emergency funding of the banking system in this country, and an ongoing disruption of economic and fiscal systems. Secondly, the Government decision to accept the outcome of the 2016 referendum and exit the European Union affected economic and scientific co-operation with Europe and beyond. The third, and perhaps the most influential, significant event was the outbreak of the Covid pandemic. This resulted in a “lockdown” of the UK population from March 2020 until March 2021, during which patterns of work and travel were fundamentally changed. All these events seriously affected the population nationally and locally, in terms of private and public financial resources, public and personal health, the nature and patterns of travel and transport, and physical planning.

The Current Development Plans for the Vale and for South Oxfordshire Districts

4.6 The most significant local event, which is key to understanding this Inquiry, and which it is imperative to take into account in assessing HIF1, is the issue in 2019/2020 by the Secretary of State for Housing, Communities and Local Government of two Directions under the Planning and Compulsory Purchase Act 2004. The first required South Oxfordshire District Council (SODC) to abandon work on the, then emerging, 2034 Local Plan, while the second required that continuing work on that plan had to reflect Government policy on housing. From published correspondence, it is clear that the funding from Homes England for HIF1 was central to this highly controversial central issue⁹.

⁹ Appendix E, SODC Archived Local Plan 2034, Direction Correspondence, 9 October 2019 and 3 March 2020

4.7 In particular, the March 2020 Direction required that South Oxfordshire's ongoing Local Plan work had to be reported monthly to Departmental officers, and: -

"One of the matters that I expect your council to report monthly on is how you will ensure that the Plan delivers a sufficient supply of new homes, in line with national policy. The National Planning Policy Framework sets out that in addition to the relevant local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for"¹⁰.

4.8 The reason behind those Directions and their relationship to HIF1 was explained by the then Leader of the County Council in a letter of September 2019 to the then Leader of SODC¹¹: -

"As you are fully aware your Council will be making a decision on the 10th October on whether it should withdraw its currently submitted Local Plan. I wanted to take this opportunity to explain the relationship this decision has with the Didcot Garden Town Housing Infrastructure Fund (GDT HIF) bid, and the potential impact the decision will have on Southern Oxfordshire, including both South Oxfordshire, the Vale of White Horse and Oxfordshire residents as a whole.

Oxfordshire County Council is completely committed to securing the necessary infrastructure for Didcot and the surrounding area. The £218m DGT HIF bid provides our councils with the opportunity to address the local transport issues that our residents have long suffered. It is for this reason that this GDT HIF bid is the highest priority of all infrastructure schemes in the county. The Didcot Garden Town HIF consists of four interdependent strategic transport infrastructure schemes:

- A4130 widening between Milton Interchange and a 'Science Bridge' including 'hybrid' cycle lanes & segregated pedestrian path
- 'A Science Bridge' from the A4130 over the railway and Milton Road through the former Didcot A site; including 'hybrid' cycle lanes & segregated pedestrian path
- A Didcot to Culham River Crossing, providing a new road link between the A4130 north to the A415; including 'hybrid' cycle lanes & segregated pedestrian path
- A Clifton Hampden Bypass west of Clifton Hampden village; including a segregated cycle & pedestrian path. All four schemes will provide significant improvements in accessibility, benefiting residents across southern Oxfordshire"

The letter continues: -

¹⁰ Ibid, 3 March 2020

¹¹ Ibid, Letter, 29 September 2019

“It is my obligation as Leader of the County Council to ensure you’re are fully aware of the consequences if your Council decides to remove its Local Plan from the examination process, thereby jeopardising the £218m much needed infrastructure required for residents.

This is essential infrastructure required now. Given existing growth, including many historical speculative sites, there has been a worsening of the highway network. Without this funding we cannot deliver the infrastructure needed to improve the network and the County Council will be forced into a position of objecting to any development, including commercial, significantly impacting on our collective ability to provide much needed new homes and jobs.”

4.10 It is this absolute insistence on the claimed essential role played by HIF1 in planning in southern Oxfordshire which has dominated the thinking of both the County and District Councils, supported by others, including the UKAEA, so that they can see no alternative to providing this particular infrastructure to support housing and employment, regardless of any other issues or their importance.

4.11 But unless and until a realistic, radical approach to transport planning in southern Oxfordshire is applied and implemented urgently, in both planning for and managing development, including to HIF1, the challenge of climate change will simply be, once again, deferred for another day. It has to be recognised through this Inquiry that permission for HIF1 does not simply mean that this particular road will be built, but that the very large sum of public money funding this scheme will be diverted from the provision of sustainable transport, not necessarily locally, but also in other locations and in sustainable ways. Once this road is built it will last for decades, if not centuries and its presence will be used as a justification or excuse to repeat the same approach here and elsewhere.

4.12 Hopefully, there are some signs of a recognition of the primacy of tackling climate change and the need to develop and implement sustainable approaches to transport planning are appearing in national policy and guidance.¹² The most relevant to this Inquiry is the current Local Transport and Connectivity Plan (LTCP) adopted unanimously by the County Council itself in June 2022. Policy 36 of this plan says that the County Council will:

“a. Only consider road capacity schemes after all other options have been explored. My comment: - *This has not been done precisely for the reasons explained in my proof concerning the failure to explore reasonable alternative options to HIF1.*

¹² Chapter 9, NPPF, December 2023

b. Where appropriate, adopt a decide and provide approach to manage and develop the county's road network. My comment: - *Despite the Applicant's protestations that the County Council did not use the discredited "predict and provide" approach to develop the HIF1 proposals, the evidence of POETS' witness, Professor Phil Goodwin, shows that this is precisely what was done.*

c. *[Not relevant to this proposal to build a new road]*

d. Require transport assessments accompanying planning applications for new development to follow the County Council's 'Implementing Decide & Provide': 'Requirements for Transport Assessments' document. My comment: - *No such TA accompanies this application because there has been no assessment using Decide and Provide approach as at my comment of (a) above.*

e. Promote the use of the 'decide and provide' approach in planning policy development to support site assessment." My comment: - *No evidence I have seen suggests promotion of this approach to planning policy, and in any event this approach was plainly not used to generate this application for the previous reasons.*

Hence I welcome the LTCP as a sign that local transport policy is moving in this new direction.¹³ Unfortunately, the current statutory development plans for southern Oxfordshire failed to do this in the case of the Vale of White Horse Local Plan 2031, Parts 1 & 2 which are out of date, while the early promise of the South Oxfordshire District Local Plan 2035 was distorted by the Government Directions of 2019/2020 as noted above¹⁴. The Joint Vale and South Local Plan 2041 (JLP) is in its early stages of preparation and, though it shows encouraging signs of adopting a more radical approach to land use and transport planning in this area, the NPPF continues to advise that it be afforded only limited weight at this time.

4.12 This uninspiring, if not depressing, application and its accompanying ES demonstrate precisely why a different and radical approach to HIF1. A simple analysis of the current statutory planning context of this area which would be affected by HIF1, shows it to be subject to: -

- a. statutory development plans for the area which have little sense of urgency in tackling climate change;

¹³ Appendix F, For example, OCC LTCP, Policy 36, June 2022

¹⁴ Op cit, Appendix E

- b. these statutory plans are based on historic administrative areas which have little relevance to the day-to-day form and function of the area;
- c. these two plans mean there is no single strategic or local statutory land use plan for the area as a whole;
- d. progress in preparing a combined statutory plan is slow and cumbersome due to legislative requirements; and
- e. The implementation of measures to provide rapid responses to urgent change and serious transport issues is hampered by the fragmented situation of service providers.

4.13 In response to the above, and to the Secretary of State's call-in letter of 25 July 2023, my view is that on matters a) and b) of paragraph 7 of the letter, I acknowledge that the two statutory development plans for the area affected by HIF1 reflect the situation at the dates they were adopted. For the VoWH District Local Plan 2031, those dates were 2016 for Part 1, Strategic Sites and Policies, and 2019 for Part 2, and for the SODC Local Plan 2035 was 2020.

4.14 In this situation, I consider that the VoWH District Local Plan 2031 is now out of date in terms of NPPF guidance, and, though the SODC Local Plan 2035 is little more than four years old, both these Local Plans are in the process of being replaced by the emerging Vale and South Joint Local Plan 2041 (JLP). The current stage of the JLP is that it is out for consultation on its preferred options and potential locations, with submission for examination anticipated in Spring 2025 and adoption later that year. Accordingly, in my view some weight should be afforded to the emerging JLP.

4.15 For the purposes of this Inquiry, I do not challenge the housing and employment policies and site allocations in either of the statutory Local Plans, and recognise that in any event, the appropriate place to challenge such policies and allocations is at their Examination stage. In the light of progress of the JLP and its whole area coverage, and given the contents of Chapter 9 of the NPPF issued in December 2023, this approach would be entirely appropriate during the coming year. But in relation to what POETS said in its Statement of Case in relation to Chapters 5 and 6 of the NPPF at that time, I have nothing to add to the POETS Statement of Case.

4.16 In terms of matter c) of the Secretary of State's letter, the extent to which the proposed development is consistent with the development plan for the

area, I can only repeat what POETS said in its Statement of Case. Briefly, this is that, despite both statutory development plans including a proposal to build HIF1 or a similar road, this policy aim is outweighed by the far weightier material considerations of the imperatives of combatting climate change and implementing genuinely sustainable development.

Local Non-statutory Plans

4.17 The most encouraging factor, apparently in support of those considerations, emerged in 2015 with the designation by Government of Didcot as a Garden Town¹⁵. This established a Delivery Board which produced a masterplan in 2017, reviewed and amended in 2022. This covered an area across the boundary between the two Districts which bisects Didcot, and identifies a wider Area of Influence¹⁶. The 2017 masterplan introduced some new forward-thinking sustainable principles and proposals, particularly in section 5, “The infrastructure to support the garden town¹⁷.” These included the Evidence Base Study Report by Steer Davies Gleave¹⁸, which analysed sustainable transport options for the garden town. Its analysis of the town’s historic development concluded: -

“...this has resulted in:

- A high level of north/ south severance by the railway line
- A development pattern that has had a high reliance on movement by car
- A road network that is under pressure dealing with both strategic and local movement
- A need for alternatives to car transport”

4.18 This analysis is in my view entirely correct, and the study went on to put forward a vision for tackling them, and summarising its proposed projects thus:

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“The garden town vision identifies a number of projects that both address these historic issues and reinforce the core principles of the transport plan. The vision also seeks to promote the sustainable transport modes that are

¹⁵ Appendix G Press release, New garden towns to create thousands of new homes, MHCLG, 7 December 2015

¹⁶ Map 1, SODCLP 2035, p275, Appendix V

¹⁷ Appendix H, SODC website > Planning > Didcot Garden Town > Delivery Board > Masterplan, Section 5, 2017

¹⁸ Appendix I, South Oxfordshire Sustainable Transport Study for New Developments, Evidence Base Report, Steer Davies Gleave, July 2017

embedded in the need for alternatives to car transport. The garden town vision identifies a number of projects that both address these historic issues and reinforce the core principles of the transport plan. The vision also seeks to promote the sustainable transport modes that are embedded in the Didcot Garden Town masterplan. The garden town team's new proposals include:

- Giving more alternatives to travel by car
- Utilising technology to deliver smarter travel choices
- A greatly improved cycling network with a new regional connection between Harwell Campus, Didcot and Culham Science Centre
- Enhancing a greatly improved public transport system
- Three new "movement corridors".

4.19 But, inexplicably, the Study also proposes, "Infrastructure projects (discussed in more detail later in this chapter) like Science Bridge are primarily associated with severance whilst Station Gateway looks to improve the arrival sequence and sense of place. They all need momentum and funding if future growth is to be achieved. By giving more viable travel alternatives to the private car, the garden town vision seeks to promote a healthy environment where connected, walkable and rideable neighbourhoods encourage an active lifestyle. By creating compact, mixed-use and transit-oriented development it is also possible to reduce local congestion. All of these objectives and proposals give a balanced investment strategy to complement the existing local transport plan in accommodating growth."

4.20 Plainly, the HIF1 scheme patently fails to resolve all but one of the identified legacy problems in the 2017 masterplan, nor does it reflect the first four of the Steer Davies Gleave's five proposals in the preceding paragraph. It stands in marked contrast to the wider climate change imperative repeatedly highlighted by the UK Climate Change Committee, and the ongoing recommendations of the Intergovernmental Panel on Climate Change. All of those considerations highlighted the urgent need for a change of approach to transport planning in particular.

4.21 This conflict within the Report's project recommendations on transport provision appear inexplicable at first sight. The inclusion of most of the HIF1 scheme may have resulted from pressure from County Council and Vale of White Horse District representatives who were part of the Delivery Board and

who had already supported and adopted VoWHDC Local Plan, Part 1, Core Policy 17, “Delivery of Strategic Highway Improvements within the South-East Sub-Area.”¹⁹ This Policy contains three of the four elements of the HIF1 scheme, the fourth element being the Clifton Hampden By-Pass, because that lies within South Oxfordshire District. It is complemented by Core Policy 19 which safeguards land for transport schemes in the south-eastern Vale area.

4.22 Whether or not this was the reason for inclusion of most of HIF1 in the Garden Town Delivery Plan 2017, its subsequent Revised Delivery Plan 2022 cemented the road scheme into the proposals and policies of Didcot Garden Town masterplan²⁰. This also allocated the responsibility for delivering all four of the elements comprising HIF1 to the County Council as Proposed Project Nos 1 to 4, and hence has deferred development implementation of a comprehensive, rational, sustainable garden town strategy for Didcot. It reflects OCC’s insistent adherence to the HIF1 proposals, as if they are the only way in which the issues of congestion, emissions, delay and fragmentation of transport in and around Didcot can be achieved. They are not by any means the only feasible solution and, as I intend to demonstrate, other solutions are not only feasible, but are also better value for money, cheaper in themselves, cleaner, quieter, healthier and in accordance with the urgent need to combat accelerating climate change.

4.23 I conclude that the existing statutory and non-statutory plans and policies for the Didcot area are of very limited, or of no, practical value for combatting the over-riding imperative of climate change. The HIF1 application faces both the Inspector and the Secretary of State with either accepting that a radical alternative must be considered, because granting permission for this road would be indeed leave the area with an unsustainable legacy, or refusing to grant permission and release the opportunity to adopt positive, sustainable planning principles to improve the area’s environment and population as a whole.

¹⁹ VoWHLP, Part 1, Core Policy 17,

²⁰ Appendix J, Revised Garden Town Delivery Plan, Schedule to Chapter 11, 2022

SECTION 5 (C)

ALTERNATIVE SUSTAINABLE STRATEGY

TOPIC 4

5. C. An Alternative Sustainable Strategy for the Science Vale

Introduction

5.1 What I suggest here is a scheme with various elements forming alternatives to the HIF1 road and its car-dependent, high emissions, unhealthy, congestion-generating and poor value for money features. It is based on evidence from existing examples of sustainable transport in this country and beyond to show how other administrations have tackled transport issues not dissimilar to those in Didcot and the surrounding area. It is NOT a blueprint, but just one idea of how new approaches to land use and sustainable transport planning for this area could provide, I believe, not only feasible, but cost-efficient, sustainable, civilised, of human scale outcomes far preferable to a road proposal. That surely must be the aim of all those involved in planning in a time of climate emergency²¹.

5.2 I have employed the term “Science Vale” because this has been used in local plans for this area since at least as far back as 2011 (see the SODC and VoWHDC planning websites). The key ‘anchors’ of this concept are Harwell Campus, to the south-west, and Culham Campus, to the north-east, both science-based developments which were sited here for strategic wartime and early postwar reasons. They employ several thousand staff between them, generating large traffic movements. Together with Milton Park, another former military site close to Didcot, they provide the employment core of southern Oxfordshire; accordingly, their transport-generating capacities and development implications must be recognised. What I do NOT accept is that, despite their (relatively) difficult locations, poorly served by the sustainable

²¹ BBC News, 1 May 2019, “UK Parliament declares climate change emergency” Accessed online 18 January 2024

transport modes of foot, cycle and road or rail, demand a vehicular, private car-based solution. I accept that the Culham site has some rail access, so it has a more sustainable location.

5.3 I also accept, as already stated, that the proposed housing allocations of the development plans for the Science Vale area should be met, at least until alternative locations can be incorporated in the emerging South and Vale Local Plan 2041. I also recognise that the traffic generated by this proposed housing has to be served by adequate and efficient transport, especially between home and work. But that does NOT mean that the only, or even the preferred, answer to the undeniably huge traffic demand of home to work journeys must be served by this large, expensive, environmentally damaging and land-hungry road scheme. To give one example of an obvious alternative to daily commuting between home and work, one of the previously unexpected side-effects of the Covid 'lockdown' on such journeys is now widely recognised, with an increasing proportion of employees today working from home for all or part of each week. The extent of this effect is dealt with by others in their proofs but, as HM Treasury and the Planning Inspectorate have known for decades, homeworking is today possible and cost-efficient, and produces many benefits (and some disadvantages) for homeworkers. For this reason, I believe that alternative and already utilised modes of transport between home and work are an option for homeworkers needing to visit workplaces occasionally; similar considerations apply to other journeys between home and examples including school, shopping, leisure and so on.

5.4 To develop a possible alternative sustainable transport system in the Science Vale as an alternative to HIF1, I used a simplified 'SWOT' (strengths, weaknesses, opportunities and threats) analysis, as applied in the South Oxfordshire Local Plan 2034, the predecessor of the current 2035 plan²². The area analysed was limited to the Science Vale area, excluding Wallingford, Thame and Faringdon, but extended northwards to include Abingdon and Radley. The inclusion of Abingdon was to emphasise my concern that the ES does not assess the effects of HIF1 on the town centre, despite its size and proximity of Abingdon to HIF1, barely 3km to the south-east. Given that traffic flows and associated congestion between Abingdon and Culham Campus are

²² Appendix K, SODC Core Strategy, archived Local Plan 2012, p20

referred to by the Minister for Net Zero and Climate Change in his request for this application to be called-in²³, that seems an inexplicable omission.

5.5 My view is reinforced by a failure of the HIF1 scheme to take into consideration of the contents of the Abingdon Central Area Regeneration Framework (CARF) of February 2023²⁴. This was produced by the VoWH with the intention of informing both the emerging Neighbourhood Plan and the emerging Vale and South Local Plan 2041. The CARF aims for the reconfiguration of Abingdon Bridge, including permanent partial, one way only, flow of traffic across Abingdon Bridge, which currently carries the A415 between the town and Culham Campus; such a scheme if implemented would have major implications for HIF1. But the ES simply fails to assess this situation. Whilst CARF is no more than a material consideration, its content demonstrates a move towards sustainable transport, and is an example of public consultation-based, forward thinking in planning today. I therefore adopt, fully support and commend the CARF aims in Section 10.1.

5.6 Despite its non-statutory, advisory status, the CARF plan also reflects recent guidance in the updated NPPF Chapter 9, “Promoting sustainable transport”, and its new guidance; this is refreshing and necessary, especially paragraphs 114 and 116. I consider this Chapter indicates a sea change in Government guidance which undermines the philosophy of the entire HIF1 application. The application is self-evidently a top-down imposition, proposing car-centric road building, barely mitigated by adding cycleways and footways, almost all being alongside the carriageway itself. Public transport provision is barely considered, contrary to the advice in paragraph 116(a) of NPPF Chapter 9.

5.7 Perhaps in anticipation of NPPF Chapter 9, and in complete contrast to HIF1, the Department of Transport’s publication, “Bus Back Better”, of 2021²⁵ shows the value of that form of sustainable transport and how it can be applied to situations very similar to that of southern Oxfordshire. Thus, it refers to concepts such as better integration with rail using the latter as a “spine” from which bus services can radiate, as in Cornwall, and the creation of Bus Rapid Transit using segregated, high-speed networks using high frequency vehicles between key nodes in areas of dispersed settlement patterns, as in south-east Northumberland and Durham. None of these options were explored in the

²³ Appendix L, Letter from Secretary of State for Energy Security & Net Zero, 21 July 2023

²⁴ Appendix M, Abingdon Central Area Regeneration Framework (CARF), (Excerpt) February 2023

²⁵ Appendix N, Bus Back Better, DTp, March 2021

development of HIF1 or, if touched upon, were dismissed; instead, this road-based proposal was preferred, perhaps due to availability of the huge grant sought from Homes England. Yet bus route development is shown by “Bus Back Better” to have a cost-benefit ratio of 4.2, far above almost any road building scheme.

Alternative Proposals

5.6 My suggestions for sustainable transport are set out on Map 2, showing a schematic plan of the existing Science Vale main roads and railways, the proposed route of HIF1, and the centres of population and employment. Map 3 sets out a diagrammatic representation of how those railways and roads could be linked to settlements by bus routes in a more segregated manner. Though Map 3 is at too large a scale to show them, cycleways and footways would also follow this principle of separation from vehicular traffic as far as physically possible and where they should be safe for users.

5.7 The two diagrammatic plans forming Maps 2 and 3, and the thinking behind them are explained as follows: -

5.8 The logical way to construct a sustainable transport scheme is to begin by identifying the existing opportunities of involving the most carbon-efficient form of transport - rail. At the core of the Science Vale, around the Didcot Garden Town area, ***there already exists*** a sustainable transport spine – the railways centred on Didcot Parkway station. The route of the Paddington to Bristol and South Wales (Great Western) Main Line runs east-west through this station, which is also the junction of a second line serving Oxford and the Midlands. The latter is part of a strategic rail freight system between Southampton Container Port and the Midlands via Reading. The strategic nature of both these lines explains why the Great Western Main Line is already electrified; the electrification of the Didcot to Oxford and the Midlands has long been recognised as vital economically and strategically, and I believe that it will be implemented before long. Those existing rail routes are shown in black on both Maps.

5.9 Sharing rail freight and rail passenger traffic limits the overall traffic capacity of any rail line; to increase line capacity, in this instance is by four-tracking and re-signalling the Didcot – Oxford section, already in place on the Great Western Main Line. The potential for this is recognised by Network Rail and I understand that studies have been undertaken into this possibility. This

combination of electrification, improved signalling and four-tracking would then segregate long distance passenger and freight services and enable a much more frequent local passenger service between Didcot and Oxford. This should form the core of a Science Vale sustainable transport system in the longer term, and is shown on Map 3. This capacity improvement would also ensure that all three local stations in the Science Vale, Appleford, Culham and Radley could have more frequent, and hence more attractive, passenger services for longer hours, thereby generating increased revenue, increasing their commercial viability. Culham in particular could divert road traffic currently serving both the adjacent Culham Campus and the proposed housing site beyond, allocated for up to 3,500 dwellings.

5.10 This capacity improvement could, in turn, support the development of a second, closer grained, level of sustainable transport via a much-enhanced Science Vale bus system, based on each of the three local railway stations and Didcot Parkway itself, already a growing sustainable transport hub for bus and cycling modes. Diagrammatically, these potential bus hubs and links are shown in green on Map 3; they could initially use routes on existing roads, planned roads in allocated housing sites, and in due course, use also new, segregated busways on otherwise undeveloped land. Hence Radley Station has already the potential to function as a bus hub for Abingdon and its surroundings to the west with high-frequency “hopper” buses on circular routes including the town’s Ring Road, the main distributor roads and the town centre gyratory system.

5.11 This example could later be developed using a partly segregated system, separate from other vehicular traffic. This could be by constructing a lightly built busway on the track bed of the former Abingdon – Radley branch line, away from existing highways, perhaps linking Radley Station to Abingdon town centre and beyond, including the A415 south of Abingdon Bridge. In addition, the Radley Station car park could change to a Park and Ride facility, encouraging modal shift from cars to trains, especially to and from Oxford at evenings and at weekends. Busways of this nature are more attractive to passengers and efficient because stopping buses on traditional two lane, single carriageway roads hold up all other road vehicles (unless there are bus laybys for stops). Equally, vehicular traffic in high volumes leads to congestion affecting all vehicles, including buses on traditional roads. Hence separate busways (even on part of the route) and the provision of Park and Ride facilities are known to encourage modal shift, as on the Oxford Park and Ride system.

The Applicant's proposal that the provision of 18 bus stops on HIF1 would improve bus transport and encourage modal shift from cars is simply counterintuitive.

5.12 I illustrate the opportunity offered by busways by a simple case from France, where the campus of the science-based University of Sophia-Antipolis and its huge IT-related employment area is sited some 20 km north-west of Antibes, the main town in this part of the Riviera. The former highway links between the two, which were of traditional two lane, single carriageway, form were notoriously heavily congested due to numbers of students and staff commuting daily between the two places. This congested system was grossly overloaded and inefficient and bus operation became increasingly unviable. The solution developed by the Provence Alpes Department and the Communauté Antibes Sophia Antipolis (CASA) from 2009, was to construct high speed, mostly segregated, busways, providing high frequency, high-capacity bus services between the two centres²⁶. This is now in operation and to my certain knowledge is now heavily used throughout most of every weekday. Again, my colleague Roger Turnbull makes a similar point in terms of busway development in and around Cambridge.

5.13 I see no obvious reason why a similar, partial, busway system should not be constructed parallel to the Didcot – Oxford railway line and linking the two centres (Map 3). For illustrative purposes this possible busway has been shown close to the railway; in that location it might be able to cross the Thames by an enlarged bridge, rather than one accommodating just an electrified and four-tracked line. But perhaps better, the busway route could pass further east of Appleford at a new, but relatively light, bridge structure as in Photo 1, and yet still serve the three local station hubs of Culham, Appleford and Radley. Such a bridge should be made accessible to buses and emergency vehicles only, thus avoiding cars, LGVs and HGVs using it as a “rat-run” (Photo 2). A branch of this Didcot - Oxford busway would be able to serve Abingdon town centre via the A415, or by being routed to Abingdon by using at least part of the surviving track bed of the former branch line between Radley Station and the town, as far as Audlett Drive, close to the town centre. This simpler, cheaper alternative to four-tracking of the Didcot to Oxford rail line could be implemented earlier than potential rail improvements and deliver sustainable transport benefits sooner.

²⁶ Map 4 and Photos 1-4

5.14 Such a segregated system might not be practical on local routes from the local stations of Culham and Appleford, or even maybe, Radley. The diagrammatic arrows on Map 3 are simply that and no more; they are not proposals for the use of any particular road as a route for “hopper” type buses, but to give an idea of the directions in which such routes might go – a suggested link, not a precise route. For example, Sutton Courtenay might be served by a bus link from Appleford Station, as could Drayton and/or Steventon. Clifton Hampden, Shillingford and Dorchester might similarly be served by a bus link from Culham Station. What seems clear is that Culham Campus and the adjacent housing allocation would both benefit from a high frequency circular route centred on Culham Station, and/or a link between Culham Campus via the village itself and Abingdon.

5.15 This leads to the third level of sustainable transport provision, a cycleway and footpath system across the Science Vale to give those living, working or visiting there the chance to exercise readily and enjoyably. This system should again rely, as far as possible, on segregated facilities where those can be provided safely for users through reliance on a sense of security and personal safety due to the proximity of dwellings, overlooking and busy pedestrian use. These are well-established urban design principles and there is no reason not to ensure they are incorporated in cycleway and footpath designs, whether for existing or new development of all types. Due to the area involved in creating illustrative Maps 2 and 3, it is not possible for them to show these cycleways and walking routes, but they are vital to forming this third essential component of a sustainable transport system and there would be a good opportunity for routes for cyclists and walkers to be planned using those users’ experiences and work with the planning and highway authorities to design such a system. It is imperative these facilities for active travel be planned for at the earliest stage of housing and employment sites and incorporated in any proposal for the detailed layout and design of a sustainable transport system for the Science Vale.

5.16 My alternative suggestions for sustainable transport in Science Vale also have an important advantage over the end-state proposal of HIF1. Not only does the latter have to meet a deadline for spending the Homes England grant of £218mn +, but my understanding is that this money has to be spent in total by an end date of 31 March 2025, thus requiring the entire scheme to be built and completed as one in an incredibly short space of time. This is a matter dealt with my colleague Chien in his evidence. By contrast, my alternative

scheme would be able to be implemented in as many stages as feasible and affordable, hence avoiding an ‘everything or nothing’ scenario. The existing rail system is in existence and can probably be improved, even if only by way of electrification and signalling only at first as a ‘standalone’ project. A parallel busway could be routed as in my option for an eastern separate route over a lighter Thames Bridge towards Culham Station and Culham Campus more quickly than the whole scheme. Similarly, bus routes by “hopper” buses can be introduced within months and would require no infrastructure initially. Cycleways and footpath systems can be designed overall but implemented in stages and would be cheap to provide. All these possibilities make a sustainable transport system far more cost-effective and affordable than HIF1, with few, if any, of that scheme’s drawbacks.

5.17 This alternative idea is one illustration of how a sustainable transport system for the Science Vale could be developed. I have not dealt with the core of Didcot in my idea, nor have I covered links to Harwell Campus, Harwell village, or the land and settlements southwest of the A34. The last is covered by my colleague Roger Turnbull in his proofs on behalf of East Hendred Parish Council, and I have no intention of duplicating or contradicting his evidence. Before concluding, I wish to add two points concerning the south western leg of HIF1, essentially the Science Bridge proposal and the Didcot Central Corridor west of the Science Bridge. Firstly, the proposed widening of the A4130 to form a four lane, dual carriageway, on that section fails to serve the major employment centre of Milton Park which lies north of GW Main Line. The existing roads serving that development are tortuous and involve a restricted geometry; that at its eastern end has alternative one-way traffic lights and an 18t weight limit. HIF1 will do nothing to alter this situation. Neither does HIF1 rectify or provide a reasonable link to the former Didcot A power station land, now clear of development, and subject of at least one valid permission for employment development²⁷.

5.18 Secondly, I am not convinced of either the need or desirability of the Science Bridge proposal, which, despite its inclusion in the garden town Delivery Plan 2017, appears to be nothing more than a vanity project. HIF1 north of the Science Bridge is not required to link land to the north of the A4130 Didcot Central Corridor Road to the A34 and/or Milton Park for the reasons described in the previous paragraph. In addition, the height of the

²⁷ VoWH Ref no. P21/V0167/Ful, Oct 2021

proposed Science Bridge necessary to clear the electrified Great Western Main Line gives rise to serious objections. These are: -

- Its inordinate expense, estimated as some £43 million capital and £14 million revenue expenditure according to the 2017 garden town Delivery Plan, which cost will have risen substantially since then;
- inordinate land take, especially on its southern side, due to the height of the Bridge necessary to clear the Main Line embankment and its electric overhead lines and the need to limit the gradient of the road's approaches to the Bridge from either direction; and
- unnecessary part sterilisation and land take from the cleared site of the former Didcot A power station on its northern side by its approach road cutting across that land. Yet the power station site is relatively close to the town centre and, as perhaps the biggest undeveloped single site in the entire Science Vale, its location offers a huge opportunity for comprehensive development. This would be the case if, within a few months of this Inquiry, the existing valid permission referred to in my Footnote 27, expires, hence permit its use as part of the power station land. Using a road across this in such a profligate manner as does HIF1 would be irresponsible.

All these matters and more are considered in the evidence of Russell Harman in his proof which I support.

Conclusions

5.19 In conclusion and most importantly, I would point to a new report by the social foundation Create Streets, which, at the date of this proof, was about to appear, showing how a large residential extension to Chippenham, Wiltshire, could be developed using sustainable transport and land use planning principles, entitled "Stepping off the Roads to Nowhere"²⁸. The benefits of the report's "vision and validate" integrated approach to transport and land use planning are explained clearly and concisely and in summary are, to create a civilised, healthier, less land hungry and environmentally attractive place to live. Those benefits are very similar to what Colin Buchanan was seeking to ensure in his seminal report "Traffic in Towns" 60 years ago, but which we have lost during the interim.

²⁸ Appendix O, Stepping of the Road to Nowhere, Create Streets, February 2024

5.20 But “Stepping off the Roads to Nowhere” is by no means alone; similar reports or studies have appeared in recent years by Transport Action Network, Transport for New Homes²⁹, The Chartered Institute of Highways and Transportation (CIHT)³⁰, and the Town and Country Planning Association (TCPA)³¹. The Department has contributed to this change of thinking with publications such as “Bus Back Better” noted above, the Transport Decarbonisation Plan review³² and its accompanying DTp Circular 01/22, and Press releases including, for example, “Hundreds of new zero emissions buses to connect new communities in England”, September 2023³³. Most significant of all was the MLUC&H release of the NPPF of December and its Chapter 9 discussed above, and the announcement in September 2023 by the Secretary of State for Levelling Up etc, of a long-term plan for housing to provide beautiful, safe, decent homes in places with high-growth potential in partnership with local communities³⁴. The last concentrated on the Cambridge area as its exemplar, a city dealt with by Roger Turnbull in his evidence. Yet there is no reason why similar sustainable transport and development proposals should not be developed and implemented in Oxfordshire, including the Science Vale and Didcot.

5.21 Implementation of plans of any kind is the key to delivering the benefits of those plans. At present, responsibility for implementation of alternatives to HIF1 in terms of a sustainable transport system is fragmented, with National Rail and Train Operating Operators sharing responsibility for the tracks, the former for signalling systems and stations, and the latter for operating train services using separate companies. Transport provision on roads and footpaths is the responsibility of the highway and planning authorities, under the control of local and central government departments. In this situation the development of an integrated transport system is all but impossible in areas outside London and the main metropolitan areas. Lately, however Parliament has recognised this barrier to sustainability in an era of climate change and introduced legislation to enable local authorities outside those areas to use powers to set up Local Transport Authorities (LTAs) which would, by including

²⁹ Appendix P, Garden Villages and Garden Towns: Visions and Reality 2024 and Building Car Dependency, 2022, Transport for New Homes

³⁰ Appendix Q, Report, Better planning, better transport, better places, CIHT, 2019

³¹ Appendix R, Our shared future – a TCPA White Paper for Homes and Communities, TCPA 2024

³² Appendix S, Decarbonising Transport – One Year On, DTp, 2022

³³ Appendix T, Press release, DTp, September 2023

³⁴ Appendix U, Press Release, “New era of regeneration, inner-city densification and housing delivery across England, DLUH &C, 24 July 2023

those transport matters already under their control, roads, cycleways and footpaths, enable them to manage and operate and integrate all public transport services, rail and road, across their areas. My understanding that this possible approach is now under consideration by this County Council, and probably by others. If so, then this could enable implementation of a sustainable transport system such as that I have suggested and would form the missing part of such a vital system.

5.22 In the light of these considerations, I believe I have shown that this area needs urgently a realistic, humane alternative approach to Didcot's land use and transport planning issues than HIF1. Accordingly, I ask the Inspector to recommend, and the Secretary of State to decide, that this application is not the answer to the land use planning and transport issues of southern Oxfordshire and to refuse planning permission.

Richard Tamplin

30 January 2024

