

## **SUTTON COURTENAY PARISH COUNCIL'S RESPONSE TO APPLICATION R3.0138/21**

Comment on the Notice of Submission of Further Information in relation to Application for Planning Permission Accompanied by an Environmental Statement (Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 as Amended)

Sutton Courtenay Parish Council (SCPC) is also represented in the submission<sup>1</sup> by the Neighbouring Parish Councils' Joint Committee (NPC-JC)<sup>2</sup> which has been produced by its consultant Mr Hopkins. This response seeks to reinforce aspects of that submission with particular reference to SCPC's concerns.

### **Inadequate Consultation**

There is a long history of Oxfordshire County Council's (OCC) consultation with Sutton Courtenay Parish Council (SCPC) on the HIF1 project. To date key questions asked by SCPC have not received substantive responses.

A presentation was made to SCPC in July 2019 by Oxfordshire County Council's Principal Infrastructure Planner. Subsequently, we welcomed the offer by OCC's HIF1 Transport Planning Team, in July 2020, to hold more detailed discussions. We feel extremely frustrated by the lack of substantive responses to queries raised by Sutton Courtenay Parish Council since 2019. This frustration has been heightened by the failure to address our issues in the additional information provided by OCC and its consultant pursuant to the Regulation 25 request.

We appreciate that it is important that local planning authorities identify and consider all relevant planning issues associated with a proposed development. Consultation is a requirement and part of the planning process. However, in this case the consultation feels like a box-ticking exercise. It ignores the fact that consultees may be able to offer particular insights or detailed information which is relevant to the consideration of the application and hence issues raised should be meaningfully addressed. In essence, therefore, SCPC does not feel that its concerns/comments/questions have been adequately addressed during the consultation process, including in the Regulation 25 Response.

### **Traffic Modelling**

A key issue for Sutton Courtenay, raised repeatedly over the last five years, remains a lack of modelling data in the public domain with no sight of validated traffic modelling assessments, that clearly demonstrate that having a junction between the B4016 (Appleford Road) with the proposed 'Didcot to Culham' Road, will reduce or indeed increase, the traffic impact through Sutton Courtenay.

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<sup>1</sup> NPC-Joint Committee - Further objection 20.1.23 emailed to Emily Catcheside by Gregory O'Broin on 20/11/2023 at 2:10 PM

<sup>2</sup> Neighbouring Parish Council Joint Committee (NPC-JC) which represents five Parish Councils along the route, namely Appleford, Sutton Courtenay, Culham, Burcot and Cliffron Hampden and Nuneham Courtenay.

Despite repeating this in Query B in the Regulation 25 request, it remains unanswered. Instead, the Regulation 25 response merely repeats the data originally provided in the application and makes no allowance for the induced traffic that this junction and the scheme as a whole will attract.

The Regulation 25 Traffic Assessment response is also notable for the number of times AECOM (on behalf of OCC) seeks refuge in an 'out of scope' response to our queries.

We are told that the scheme aims to 'future-proof the local infrastructure' provision and reduce congestion around, and through, the villages, whilst providing value for money. SCPC has been seeking clarification around many issues, including the efficacy of the transport data underpinning the scheme for several years. However, to date the evidence provided, has failed to demonstrate:

- that traffic (both through and local) in Sutton Courtenay and Appleford will be eased by the HIF1 improvements.
- the resilience and robustness of the proposed new road network against gridlock in Sutton Courtenay due to untoward traffic incidents and future (planned and unplanned) growth. Traffic incidents are not unknown on the A34 around the Harwell to Milton Interchange to Abingdon sections and result in grid lock of Sutton Courtenay. The inclusion of a junction on the B4016 will most certainly exacerbate the grid lock through Sutton Courtenay during A34 accident conditions. No test of reassignment has been conducted.
- that the proposed junction on the Appleford Road (B4016) will ease traffic flow through Sutton Courtenay even with the cumulative impact of 15,500 new homes (3,300 already built), that the HIF1 is supposed to support.

Despite frequent requests, OCC has ignored SCPC's recommendations on traffic mitigation measures, including: derating of the B4016 through Sutton Courtenay; termination of the Hanson and FCC routing agreements and traffic calming through the village. OCC has stated that traffic mitigation measures through the village are 'out of scope' of the current HF1 proposals.

The application fails also to demonstrate that increasing the road network connectivity, including the junction, will **not** result in Induced Traffic Demand (ITD) and "create" further congestion or create a rat run through Sutton Courtenay under anomalous conditions.

Alarmingly, the application acknowledges the congestion will return to current levels in eight to ten years. However, estimates, which include 'Induced Traffic', indicate that it could be as short as two years. Either timeframe raises questions over the scheme's benefits and value for money and whether the funds could not be better used with a more modern approach to sustainable traffic, which could be more effective in meeting the HIF1 aim of 'future proofing local infrastructure provision'. All that is not to mention the upheaval the construction of the current scheme will involve.

It should also be noted that the HIF1 road is an arterial development from the A34 to the B4025 close to Nuneham Courtenay and a few miles from M40. It will, therefore, bring significant commercial traffic to the area.

In addition to the above, we are concerned with the lack of comparative assessment of alternative options. Most have been arbitrarily dismissed with no proper assessment of alternatives carried out.

## **Conflict with Policies and other Issues**

As NPC-JC's comprehensive response<sup>3</sup> has been fully endorsed by Sutton Courtenay Parish Council, for the sake of brevity, we do not repeat the details here but note that the planning application conflicts with a significant number of planning and internal policies and despite the additional Regulation 25 information still remains deficient in that regard. In particular:

- Part-2 of OCC's newly adopted Local Transport and Connectivity Plan (LTCP), contrary to the guidance set out in para 49 of the NPPF.
- Legally binding national targets for significant reductions in carbon emissions and carbon neutrality.
- Financial constraints may compromise Didcot Garden Town's emerging Local Cycling and Walking Infrastructure Plan (LCWIP) as the design is pruned to meet budgetary constraints.

Other points of note are:

No Health Impact Assessment (HIA) has been submitted, despite the specific policy requirements of LTCP Policy 9.

Although a Climate Change Position Statement has now been submitted it fails to meet the requirements of LTCP Policy 27.

The HIF 1 scheme fails to comply with the Department for Transport's Transport Analysis Guidance (WebTAG) in its assessment of alternatives to a new road.

Air Quality – SCPC consider the claim of benign impact of the HIF1 road on local communities is unrealistic and has not been demonstrated. Levels of NO<sub>2</sub>, PM<sub>10</sub>, PM 2.5 in the Environmental Statement are based on computer predicted values and no evidence is provided that the values reflect the expected local distribution of pollutants for local communities. The area borders an active landfill and gravel works, with specific environmental conditions which have not been assessed.

The Noise Assessment has been arbitrary with no measurement of traffic noise on the Drayton Road in Sutton Courtenay. This a busy road with heavy volumes of traffic and failure to measure noise impact is a major omission.

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## **Financial Viability**

Post-Covid, the original HIF1 budget is acknowledged to be a considerable underestimation and potentially any further costs largely falling on local taxpayers, which raises very serious doubts on whether the project can be delivered, particularly given current levels of inflation. Whether a scheme is viable and deliverable within the given budget is a material planning consideration and should lead to this project being withdrawn.

The County Council is already alert to this and concerned about the associated risks to its finances. However, it hopes to prevent escalating costs by reviewing the scheme and applying 'value engineering', which is likely to reduce support for more sustainable transport provisions such as cycleways, walkways and links to footpaths. The demand for increased funding is also likely to mean that only part of the scheme would be completed. Given that Sections B (Science Bridge), C (Didcot to Culham) & D (Clifton Hamden bypass) are interrelated, the objectives claimed cannot be achieved.

## **Summary**

It is clear that the proposed scheme is unaffordable (poor value for money for an A road that will cost £33m per mile or £64m per mile for Section C) and fails to meet its basic aims of reducing congestion and future proofing the local infrastructure provision. SCPC therefore urges OCC to withdraw the current application and adopt a more modern approach to sustainable traffic, which would be more effective in meeting the HIF1 aims.

Finally, the Parish Council contends strongly, that any modifications, including belated attempts at 'value engineering' to a major planning application such as this, must be treated as a new application and the consultation process started afresh. It also reserves the right to comment further should more documents be submitted by the applicant before the planning committee consideration.