#### **INQUIRY STATEMENT**

#### PROOF OF EVIDENCE – DELIVERY & CONSTRUCTION RISKS Prepared by R.Harman CEng MCIBSE

# Scheme: Application by Oxfordshire County Council : planning application number R3.0138/21

# Title: Dualling of the A4130 carriageway, construction of the Didcot Science Bridge, road bridge over Appleford railways sidings and road bridge over the river Thames and associated works between:

### A34 Milton Interchange and the B4015 north of Clifton Hampden Oxfordshire.

My name is Russell Harman and I'm an advisor to the NPC -JC. I am a Chartered Engineer and have over 40 years' experience working in the Construction Industry with Tier 1 Civil Engineering Contractors such as Costain & Taylor Woodrow, Managing Projects in very challenging Public Interfacing Environments, such as operational Airports [Gatwick] and Railways [Kings Cross and London Victoria].

My specialism is Infra-structure Systems & and management of Infrastructure System Stakeholders such as London Underground, Network Rail and SSE.

The purpose of my Proof of Evidence is to provide the Inspector with potential Construction Risks that could affect the viability of the overall HIF 1 Project Designs, Programme and Costs.

There are three main risks that will affect the viability of this project:

- 1. Design surety
- 2. Programme surety
- 3. Cost surety (as a result of Design and Programme outcomes + any external influences such as Inflation).

These three main risk considerations can be applied to the following example topics:

- Stakeholder Management Requirements and Mitigations Project wide
- Construction Phase Plan coinciding with Network Rail Possession Schedule
- A4130 & Milton Road Closures Science Bridge
- Geotec Information Science Bridge & Culham River Crossing
- Flood Risks Management Culham River Crossing

From the number of Objections to HIF1 by the Utilities, established businesses, and landowners, it can be reasonably concluded that key Stakeholders Requirements and needs have not been addressed and closed out. Adjustments to the Road alignment and or enhancements to the scope and designs, including utility hardening, following Stakeholder consultation is highly likely.

The HIF1 Scheme Designs will be affected by Primary Stakeholders such as Network Rail, National Grid, SSE, Thames Water, UKAEA, Commercial Estates Group, LEDA Properties, and RWE Generation. These Stakeholders will need to be consulted and could be a lengthy process to achieve a final agreed HIF1 Scheme. The outcomes may be subject to supplementary Planning Applications. For example, Road Realignment to accommodate LEDA's and CEG's aspirations. See Objections 25 & 26.

The Science Bridge/Network Rail Interface will be the biggest Construction Risk and I believe will have a major impact on the HIF1 Project Schedule. Complying with the NR's Safety Requirements, Possession Management Procedures and Schedule will be a costly and time consuming exercise.

During the Science Bridge construction, lane and road closures of both the A4130 and Milton Road will be potentially required to accommodate piling and lifting operations. It is possible that more inventive methods to construct the Science Bridge could be considered, but it is highly likely these will have a high cost impact.

If approved, the HIF1 will be a major piece of infrastructure which will have a design life of around 100 years if not more. Given that Appleford Sidings will be in existence only for the short term 10year-15years, it seems excessive to build a Bridge, that potentially will become redundant by 2035. The Appleford Sidings Bridge will then become an unnecessary costly blot on the landscape, which will require OCC to maintain until 2128 if not longer. This would seem to me to be a total waste of public money.

I believe the Planning Application Process should consider induced heavy Construction Traffic and the impact it will have for various construction scenarios. For example, there will be more than 5,400 lorry deliveries alone just to provide the material to elevate the road above the Network Overhead Line Cabling height.

It is also my opinion that the Inspector should be provided with Construction Traffic Model scenarios which considers other major Construction Projects where the project schedules run in parallel. For example, the Hobbyhorse Lane development would add a further 2,300 lorry deliveries to provide the required drainage scheme. This would make a total of 7,700 lorry deliveries in/around Milton alone.

The Applicant may consider that the Construction Risks are the "Contractors" responsibility and therefore do not need to be considered during the Planning Stage. This is a seriously risky assumption to make, if the project is being sold to the Government and the General Public with an overall time scale and budget.

I believe the Inspector should have a full appreciation of the Construction Delivery Methodology as part of the "viability assessment". The Inspector should have at this Inquiry, the Applicants Top 10 Construction, Safety and Financial Risks to be able to make an informed decision.

The only winners here will be the Contractors who will make money on any changes or additions to the scope. For me, the HIF1 Scheme is a fabulous commercial opportunity for the Contractors, which will be to the detriment of the Tax Payer.