#### NEIGHBOURING PARISH COUNCIL JOINT COMMITTEE

(Appleford-on-Thames PC, Sutton Courtenay PC, Culham PC, Clifton Hampden & Burcot PC, and Nuneham Courtenay PC)

BY EMAIL 21 MARCH 2023

The Secretary of State for Transport
Department for Transport National Transport Casework Team
Tyneside House, Skinnerburn Road
Newcastle Business Park
Newcastle upon Tyne
NE4 7AR

Dear Sir or Madam

# HIGHWAYS ACT 1980 AND ACQUISITION OF LAND ACT 1981 - OBJECTION

Didcot Garden Town & Oxfordshire Highways Infrastructure comprising A4130 Improvement (Milton Gate to Collett Roundabout), A4197 Didcot To Culham Link Road, and A415 Clifton Hampden Bypass.

- 1. COMPULSORY PURCHASE ORDERS 2022
- 2. DIDCOT TO CULHAM THAMES BRIDGE
- 3. SIDE ROAD ORDERS 2022

The Neighbouring Parish Council Joint Committee (NPC-JC) represents five parish councils along the route of the HIF1 road scheme. None of the Parish Councils own land listed for acquisition, however, they represent the interests of circa 5,000 residents that will be affected

The Joint Committee wishes to object to the Compulsory Purchase Orders (CPOs), Side Road Orders (SROs) and other related plans and urge the Secretary of State to reject the Orders.

The Joint Statement of Reasons (JSOR) provided is misleading and the underlying facts do not justify this development. It fails to demonstrate a **compelling case** in the public interest. The HIF1 scheme will just deliver more traffic to the area and will not relieve congestions as claimed.

The HIF1 scheme fails to satisfy the compelling case standard in several areas:-

### 1. Climate Policies

by this development.

Building a road scheme of this nature linked to a major highway route (A34) runs counter to the climate policies of Oxfordshire County Council (OCC) and the two district councils (SODC & Vale of White Horse). This will release 154,000 tonnes of CO2 (OCC estimate<sup>1</sup>) plus 15,000 tonnes of CO2 per annum from operations. This is not compatible with the County's climate policies, nor can these CO2 emission levels be held to be in

<sup>&</sup>lt;sup>1</sup> OCC conservative estimate. Using the Leeds University EE-IOA model the estimate is 288,414 tonnes of CO2.

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any way in the public interest<sup>2</sup>.

## 2. Traffic Congestion

There is a perfectly good road network in place which has been used to build houses at Great Western Park, Ladygrove and other locations around Didcot. This road will link the A34 at Milton will deliver increasing volumes of traffic to a B road (B4015 Oxford Road) close to Nuneham Courtenay.

The traffic assessment is deeply flawed and the impact on local roads (through village traffic) has not been measured. The model assumes the same amount of traffic will arise 'with' the scheme as 'without'. This is unrealistic and ignores induced demand. The analysis is misleading and exaggerates the benefits of the scheme. Taking OCCs own figures travel times increase from 19.2 mph to 25.9 mph in 2024 but fall back to 18.1 mph by 2034. This is less than the current speed. Thus, any benefit will only be (at best) temporary and will not relieve traffic congestion.

All available evidence shows new road space quickly fills up with cars which in turn leads to more congestion. None of this is in the public interest particularly at such high cost £294M and poor value for money (£32.8M per mile).

## 3. Local Policies and National Planning Policy Framework (NPPF)

The scheme conflicts with a range of local policies and NPPF requirements - breach of greenbelt, requirements for climate mitigation, noise, air quality and health. For example, we note that a Health Impact Assessment (HIA) has <u>NOT</u> been provided contrary to NPPF requirements.

All parish councils in the NPC-JC wish to confirm that the consultation by OCC on this scheme has been totally inadequate.

### 4. Local Transport and Connectivity Plan (LTCP)

The development runs counter to the LTCP plan which requires a reduction of 1 in 4 car journeys by 2030 and a reduction of 1 in 3 (and Net Zero) by 2040.

The JSOR fails to show how the material change in model shift required to meet these objectives can be achieved. The provision of public transport required to reduce car usage is simply inadequate.

This major road development runs counter to the above plan and therefore is not in the public interest.

### 5. Biodiversity and Natural Environment

The development will remove 114 hectares from private landowners. This is the equivalent of 180 football pitches being removed from the natural environment to give it over to road space and cars over its nine-mile length. We note the Environment Agency

<sup>&</sup>lt;sup>2</sup> The recent UN-IPCC statement on Climate Change underlines the importance of adherence to climate reduction measures and policies. Major roadbuilding cannot be held to be in the public interest.

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has a similar objection (ref. letter 13 March 2023 on OCC's ePlanning portal).

Such an impact on the climate and natural environment cannot be in the public interest.

## 6. Funding

Funding of HIF1 continues to be a concern with funding provision now standing at £296M. Originally estimated at £234M, the scheme was re-costed in 2021 and required additional funding of £62M. No update on these costs have been provided despite rampant inflation and supply issues in the construction sector.

The plans by Oxfordshire County Council Cabinet to appoint consultants to conduct a value engineering review and to descope elements of the scheme flies in the face of their claim that sufficient funds are available to deliver HIF1. The scheme comprises 4 interrelated sections (A, B, C & D) and part delivery must reduce and eliminate claimed benefits.

We ask that funding adequacy is now addressed with reference to the Vicarage Field decision (APP/PCU/CPOP/Z5060/3278231).

NPC-JC claim that this development fails to meet the high standard required to demonstrate a compelling case in the public interest. The scheme is deeply flawed and runs counter to any objective assessment on the climate emergency and need to reduce CO2 emissions. There is no basis to compulsorily acquire land which if the scheme does not proceed due to funding constraints or part delivery will lie fallow as unproductive assets held by OCC.

We urge that these Orders are rejected.

Please acknowledge this letter.

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Your faithfully

Greg O'Broin (Chair)

**Neighbouring Parish Council Joint Committee**