

THRINGS

SOLICITORS

Ms Leanne Palmer
Case Officer
Planning Inspectorate

For submission via Appeals Casework Portal Only

20 September 2023

Your Reference: APP/U3100/V/23/3326625
Our Reference: FMQ/M8040-1

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Dear Ms Palmer

APP/U3100/V/23/3326625 - The dualling of the A4130 carriageway (A4130 Widening) from the Milton Gate Junction eastwards, including the construction of three roundabouts; - A road bridge over the Great Western Mainline (Didcot Science Bridge) and realignment of the A4130 north east of the proposed road bridge including the relocation of a lagoon; - Construction of a new road between Didcot and Culham (Didcot to Culham River Crossing) including the construction of three roundabouts, a road bridge over the Appleford railway sidings and road bridge over the River Thames; - Construction of a new road between the B4015 and A415 (Clifton Hampden bypass), including the provision of one roundabout and associated junctions; and - Controlled crossings, footways and cycleways, landscaping, lighting, noise barriers and sustainable drainage systems on A linear site comprising a corridor between the A34 Milton Interchange and the B4015 north of Clifton Hampden including part of the A4130 east of the A34 Milton Interchange, land between Didcot and the former Didcot A Power Station and the Great Western Mainline, land to the north of Didcot where it crosses a private railway sidings and the River Thames to the west of Appleford-on-Thames before joining the A415 west of Culham Station, land to the south of Culham Science Centre through to a connection with the B4015 north of Clifton Hampden – Call in of Oxfordshire County Council Application reference R3.0138/21

We are instructed by Mrs Jacqueline Mason (“our Client”) of [REDACTED].
[REDACTED] is a grade II listed building [REDACTED].

Our Client is aware of the above application (“the Application”) that has been made by Oxfordshire County Council (“the Applicant”) for extensive infrastructure works on a linear site passing very close to [REDACTED]. In particular works relating to the Clifton Hampden bypass occur both directly adjacent to, and on our Clients land.

On our Clients instructions we have submitted a number of representations in relation to the Application. We will not restate those objections in this correspondence, and trust that the Inspector will take full account of the existing comments. However, our Client is disappointed that her concerns

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have not been fully addressed by the Applicants despite the opportunity to do so. As a result, we are instructed to summarise our Clients position in order to assist in the determination of the Application.

Heritage

1. Our Client owns and occupies a Grade II listed building. The proposed development runs immediately to the north of this property. A report prepared by HCUK confirms that the land to the north of [REDACTED] (including the application site) contributes to the significance of our Clients property as a designated heritage asset. This report should be a part of the suite of application documents already in-front of the Inspector. If it is not available we would be happy to provide a copy.
2. The proposed development would result in a notable change to the setting of [REDACTED]. There will, therefore, be harm to a designated heritage asset which may be less than substantial, but must be considered as part of the application. Further given the statutory duty to protect heritage assets as set out in the Planning (Listed Buildings and Conservations Areas) Act 1990 steps must be taken to appropriately minimise and mitigate this harm.

Noise and Landscaping

3. Whilst the impact of the new road will, ostensibly, be to take the main body of traffic further away from our Client this is a superficial response. As a matter of fact the proposed works are designed to facilitate a significant increase in traffic numbers. This will exacerbate existing impacts and have a significant detrimental effect on our Client. Given that [REDACTED] is a Grade II listed building, these impacts cannot be easily mitigated by our Client (for example through modern double glazing) and so under the agent of change principle which is enshrined in national policy, this harm must be addressed by the Applicant.
4. The application makes reference to the noise attenuation measures which are proposed to limit the impact of the proposed development. However, these attenuation measures are largely landscape based. Further, no conditions were proposed which would secure the ongoing monitoring of the noise impacts of the proposed development and allow for further mitigations to be required should there be a future requirement. Questions have been raised about the accuracy of the Noise Reports provided by the Applicants and in the circumstances, future monitoring would be wholly appropriate.
5. The report prepared by officers when the Application was taken to committee did not provide a list of approved plans and yet all the mitigations delivered by the scheme rely on reference to these plans. It is simply not possible for the public to have confidence that the development is being appropriately controlled without certainty on the plans which are being referred to. In particular, the plan showing proposed landscaping and planting outside our Clients property has been amended a number of times and without some clarity on which plan is to be secured as part of the permission it is impossible for our Client to have comfort that her concerns have been appropriately considered by the Council.

Safety and access

6. One aspect of the proposals which concerns our Client the most is the downgrading of the existing A415 in to an accessway. The current design provides opportunity for uncontrolled parking and the ability for gypsies and travellers to use it as a layby for periods of time. These legitimate concerns must be dealt with as part of the assessment of the proposed works. It is not sufficient to dismiss these concerns as a part of a balancing exercise of public good against private harm. It is noted that officers suggested that this could be controlled by condition, but did not attempt to impose any such condition. If this approach is to be taken, a condition must be imposed.
7. Finally, whilst the retention of a footpath and cycle way will ostensibly link Clifton Hampden with the railway station, it is clear that the proposals do not represent any improvement. In particular there is no proposed safe crossing point between the “downgraded” A415 and Culham Station. Any suggestion that people should travel up north to the new road and turn left to the Station ignores all rational desire lines. Safe sustainable transport links require a controlled crossing at the roundabout.

We would be grateful if this letter, and these concerns, could be referenced as part of the upcoming Inquiry. If we can be of any further assistance in relation to this matter, please don't hesitate to contact the writer on the above contact details.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Thrings LLP', with a stylized flourish at the end.

Thrings LLP