

LETTER OF REPRESENTATION

PUBLIC INQUIRY APP/U3100/V/23/3326625

Application by Oxford County Council for the dualling of the A4130 carriageway, construction of the Didcot Science Bridge, road bridge over the Appleford railway sidings and road bridge over the River Thames and associated works between the A34 Milton Interchange and the B4015 north of Clifton Hampden, Oxfordshire (Application no: R3.0138/21)

Background. On 18 July the Planning and Regulation Committee (PR&C) at OCC refused the application by an overwhelming majority of 7-2, having spent 2 days carefully considering the evidence. This was followed within a week, by the almost unprecedented Call In by the Secretary of State of a refusal of an application, despite the application having been decided.

Since then, considerable pressure has been applied by the applicant on the Local Planning Authority which led to an Extraordinary General Meeting of the PR&C on 27 September. This committee was differently constituted from the PR&C which decided to refuse the application on 18 July and in turn, decided to adopt a 'neutral' position on the application. That was despite there having been no material changes to the application and the reasons for rejection remaining extant.

This late development has caused considerable confusion as to the approach to take to the Call-In, exacerbated by the change in dates. Herewith, however, are my initial comments. As discussed with the Case Officer I may well request to enlarge on those later. At this stage, however, I also wish to register my wish to participate in the Inquiry as an Interested Party.

Call In

The Call In letter stated that 'On the information so far available to the Secretary of State, the matters which he particularly wishes to be informed about for his consideration of the application are:

- a) The extent to which the proposed development is consistent with Government policies for delivering a sufficient supply of homes as set out in the NPPF (Chapter 5); and
- b) The extent to which the proposed development is consistent with Government policies for building a strong, competitive economy as set out in the NPPF (Chapter 6); and
- c) The extent to which the proposed development is consistent with the development plan for the area; and
- d) any other matters the Inspector considers relevant.

I ask that the Inspector initially focuses on the 'other matters' in the last sub-para, as the 'extent to which' the development meets the issues in the earlier sub-paras is dependent on the current proposal being viable and deliverable.

The scheme's stated aims were to ensure that the impact of increased housing on the traffic network was acceptable, whilst future-proofing local infrastructure

provision, reducing congestion and providing 'value for money'. Disappointingly objective analysis has shown that the scheme fails to meet any of those aims. Nowhere in those aims, were the provision of a strategic national highway or a requirement to underpin national facilities such as the Fusion Centre, as UKAEA is now claiming as a justification for the scheme.

Moreover, the close examination of the scheme by the OCC PR&C on 17/18 provided 8 reasons for refusal. Those reasons remain extant, despite the Emergency PR&C rowing back from them on 26 Sep or the leader of the County Council arguing that the 'Perfect is the enemy of the Good' at that meeting. The fact remains that the proposed scheme cannot be regarded as good. It is flawed and fails to meet the local aims it is meant to achieve so is not viable and whether it can be delivered remains highly questionable. Another claim by the Leader of the County Council is that it is part of a wider scheme. That is not a material consideration as no details are available and the scheme is meant to future-proof local infrastructure requirements. Indeed, the proposal even fails to consider the impact on Abingdon or of the frequent diversions from the A34 or of HGVs using the route as a cut-through to the M4.

Improvements to the Scheme. Here it should be stressed that since the refusal by the PR&C, it has been accepted by the County and District Councils that the scheme needs to be improved. Indeed, even before that, the applicant had instigated a Value Engineering review of the proposal, the results of which are not clear. That will, however, almost certainly lead to a reduction in the alternative transport provisions which the scheme is meant to deliver and the mitigations requested by local communities. Recently a further £50,000 has been allocated, though where the funds will come from is yet to be announced.

OCC Aim of Reducing Traffic - Induced Traffic

At the heart of my objection to the current proposal is that the traffic data underpinning the application is based on out-of-date input and fails to prove that the scheme will reduce traffic congestion in the area. Indeed, the application admits that congestion will return to current levels by 2034 and that makes no allowance for the 'induced traffic' the scheme will attract, particularly through the villages. If that had been included, estimates vary, but congestion is likely to return to current levels much earlier and possibly in as little as two years. Here I draw the Inspector's attention to Professor Goodwin's Report to the OCC Traffic Scrutiny Working Party in Feb 2022 (1) in which he states that 'the forecast relief from congestion of the HIF schemes is expected to be very short-lived'. Other experts consider that allowing for induced traffic might even be as little as two years.

The OCC TDC Officer attempted to counter that at the initial PR&C meeting on 18 July but failed to convince the committee in the face of more expert opinion and merely fell back on a defensive statement that in her professional opinion the modelling was fit for purpose.

I ask, that the Inspector robustly queries the input to and efficacy of the modelling at an early stage, to form an opinion on whether the scheme is firmly based and has the potential to meet the issues the SofS raised. In that attention should also focus on the impact of the new road on Abingdon and Golden Balls roundabout and the

stimulation of further congestion as opposed to reducing it in Sutton Courtenay and Appleford. Sutton Courtenay has for some five years been seeking assurance that the belated addition of the roundabout on the Appleford Road would not increase through traffic rather than decrease congestion. So far, no data has been produced to prove the OCC contention that the HIF1 scheme would reduce congestion in the villages.

The reality is that the network will quickly return to gridlock, at a cost of £296m without even allowing for inflation or the myriad of other risks facing the scheme. That is hardly value for money and cannot be described as future-proofing local infrastructure provision. In that context alone it fails to meet the assurances the SofS is seeking. Moreover, the current HIF1 scheme will not meet the traffic requirements of further housing and expansion of facilities in meeting the aim of Science Vale such as envisaged by UKAEA, without considerable improvements and a new application.

Deliverability of the Proposal. Given the complexity of the scheme and the limited budget, I urge the Inspector to also review the financial provision for the scheme. This may not on the surface be a material planning consideration at the local level, but the SofS in reaching his decision should be made aware of the limited financial provision, the lack of allowance for inflation and the indications that even the County Council has asked for a review of its delivery. The latter has already raised concerns that the scheme would only be partially completed, which would negate nearly all of the claimed benefits.

Other Issues. I shall leave it to others to address the wide range of issues such as climate change, health, landscape, breaches of NPPF and local policies and spell out the resultant impact on the SofS's matters of particular interest and the extent to which the proposal is consistent with Government and the Local plans.

I would, however, ask the Inspector to carefully review the balance between the harm and benefits of the scheme as currently proposed, especially bearing in mind the very limited nature of any relief in congestion across the area, which was a primary aim of the scheme.

Summary. Given the current flaws and without drastic improvements amounting to a new scheme, I contend that the proposal will not be consistent with the Government and Local Plans the SofS is seeking assurance on. I ask the Inspector therefore consider recommending that the current application be withdrawn.

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Sutton Courtenay

4 October 2023

(1) Outline Comments on HIF Forecasts and Appraisal For OCC Transport Scrutiny Working Group

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28 Feb 22