

NEIGHBOURING PARISH COUNCILS -JOINT COMMITTEE.  
Appleford-On-Thames, Culham, Burcot & Clifton Hampden, Nuneham Courtenay, Sutton Courtenay.

**STATEMENT OF OBJECTION (R3.0138/21) ON THE BASIS OF NOISE.**

**Planning Application R3.0138/21, HIF1 road between A34 Milton Interchange and B4015 north of Clifton Hampden.**

**THIS STATEMENT OF OBJECTION IS BASED ON A REVIEW OF THE ENVIRONMENTAL STATEMENT: VOLUME 1 CHAPTERS 2 & 10, NOISE AND VIBRATION, WHICH ACCOMPANY THE APPLICATION.**

**1.0 BASIS FOR REFUSAL**

The application for the development of the HIF1 road should be refused planning permission for the following reasons.

The proposal fails to comply with the following policies within national, Local and County Plans:

**1.1 South Oxfordshire District Council**

1.1.1 Local Plan 2035 Policy ENV12 (3) states that:

*“Development proposals should be located in sustainable locations and should be designed to ensure that they will not result in significant adverse impacts on human health, the natural environment and/or the amenity of neighbouring uses.”*

*2. The individual and cumulative impacts of development on human health, the natural environment and/or local amenity will be considered when assessing development proposals.*

*3. The consideration of the merits of development proposals will be balanced against the adverse impact on human health, the natural environment and/or local amenity, including the following factor....s: noise or vibration; ...*

1.1.2 Local Plan Policy DES6 states :

*“Development proposals should demonstrate that they will not result in significant adverse impacts on the amenity of neighbouring uses.....in relation to (iii) noise and vibration.”*

The noise assessment chapter 10 references this policy (in sect 10.2.19, & 10.2.20) No noise assessment has been undertaken to convincingly demonstrate that there are no significant adverse cumulative noise impacts to adjacent communities along the length of the proposed HIF1 road, such as Clifton Hampden and Nuneham Courtenay . In this absence the planning proposal fails to comply with SoDC policies ENV12 & DE26. The proposals will result in significant adverse impacts in terms of operational noise in neighbouring communities.

**1.2 Vale of White Horse District Council Local Plan 2031 part2**

Development Policy 23 Impact of Development on Amenity states:

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*“Development proposals should demonstrate that they will not result in significant adverse impact on the amenity of neighbouring uses when considering both individual and cumulative impacts... in relation to... Dominance or visual intrusion, noise and vibration.”*

Policy 23 is not satisfied. The proposals will generate significant adverse noise effect to adjacent neighbouring uses, notably at Appleford, Clifton Hampden and Nuneham Courtenay. Proposed noise barriers to ameliorate the severity will result in an unacceptable visual impact in terms of being overly dominant and intrusive in the landscape.

Development Policy 25: Noise Pollution of the Local Plan 2031 Part 2 Detailed Policies and Additional Sites states:

*“Noise-generating development that would have an impact on environmental amenity or biodiversity will be expected to provide an appropriate scheme of mitigation that should take account of.... ii) existing levels of background noise... iii) measured to reduce or contain generated noise, hours of operation and servicing ....”.*  
*Development will not be permitted if mitigation cannot be provided within an appropriate design standard”*

VoWHDC Policy 25 is not satisfied.

The noise assessment Chapter 10 references this policy (in sect 10.2.18), but fails to demonstrate that all existing and proposed background noise sources have been included in the assessment. In the instance of Appleford Sidings, the combination of mainline rail, industrial rail sidings, bridge and road traffic has not been included in the assessment. In regard to Appleford, Clifton Hampden and Nuneham Courtenay, no provision of mitigation, acceptable in noise, landscape and visual terms has been proposed to meet identified adverse noise effects.

**1.3 National Planning Policy Framework**

Paragraph 185 of the NPPF states that

*‘planning decisions should mitigate and reduce to a minimum, potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life’. And*

*“Identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason;”*

The HIF1 Planning Statement admits that there will be significant noise impacts due to the road. As itemised in this report these impacts on Appleford, Clifton Hampden and Nuneham Courtenay have been under-estimated within the design. Specific tranquil areas impacted by the scheme have not been identified and protected.

The proposal fails to meet the requirements of the NPPF.

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**1.4 Noise Policy Statement for England (NPSE) 2010**

The central justification of the noise assessment of the HIF1 road is with reference to the NPSE 2010.

The NPSE has three aims *“within the context of Government policy on sustainable development.”*

- 1 *“Avoid significant adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise”.*

The HIF1 scheme does not meet this aim, (see section 3.9.6 of this report) as significant adverse impacts on health and quality of life are predicted for this road scheme.

- 2 *“to Mitigate and minimise adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise”.*

The HIF1 scheme does not meet this aim (see section 3.9.7 of this report), as the use of noise barriers, as proposed mitigation, cannot be justified for reasons of adverse Landscape impacts and visual intrusion.

- 3 *“Where possible, contribute to the improvement of health and quality of life”.*

The HIF1 scheme cannot meet this aim, as it fails to meet aims 1 & 2.

**2.0 ENVIRONMENTAL STATEMENT CHAPTER 2, THE SCHEME**

**2.1 The effects of Noise -Scheme C ,Didcot to River Crossing**

DEFRA, under the obligations of the Environmental Noise Regulations 2006, have mapped road and rail noise corridors throughout the UK. The Noise Action Plan for the Didcot area identified four “Noise Important Areas” where noise has already reached a critical level. One of these is Appleford, adjacent to main line rail and at the closest point to the proposed road. OCC has a duty to recognise noise critical areas and seek to control future noise.

The OCC supporting Document “Environmental Statement chapter 2” disregards this obligation. There is no analysis of the cumulative noise environment that will result from the combination of noise from multiple sources, viz: main line rail, freight shunting and unloading at Appleford Sidings, reverberant effect of proposed road bridge over Appleford Sidings and the imposition of road noise with HGV traffic. The document acknowledges that it makes *“no attempt to combine noise levels from different sources.”* and that *“ambient noise levels may be higher than indicated”*. The conclusions of the Environmental Statement on noise are therefore seriously in error.

Route option appraisals, including noise assessment for each option, are required. For a Sidings bridge option this must include the specific noise contribution of vehicles accelerating and decelerating on the gradients leading to the bridge for both HGV and cars. This assessment must demonstrate that the preferred route has been selected on the basis

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of minimizing or avoiding noise impact on dwellings in Appleford and at the other communities with Noise Important Areas. This assessment must be undertaken in the context of a Noise Action Plan as required for DEFRA for this location in Appleford. .

DEFRA recognizes that at Noise Important Areas, such as Appleford *“the population is likely to be at greatest risk of experiencing a significant adverse impact to health and quality of life”* OCC will fail to meet its obligation to seek reduction in future noise in Appleford by deliberately increasing noise to unprecedented levels due to the routing of the HIF1 road..

Therefore, the current planning application for the HIF1 road must be rejected in order to permit an alignment to be investigated that minimises the noise impacts and comply with adopted planning policies.

**3.0 ENVIRONMENTAL STATEMENT CHAPTER 10, NOISE AND VIBRATION**

**3.1 CONSULTATION WITH RELEVANT STAKEHOLDERS**

The scoping exercise was deficient and failed to adequately define the scope of the study to meet the requirements of VOWH and SODC.

- 3.1.1 Section 10.3.2 of Chapter 10, 3<sup>rd</sup> bullet identifies that *“ It was acknowledged that in some areas along the Scheme which are remote from existing main roads, but close to other existing noise sources such as the railway between Didcot and Oxford and industrial operations, ambient noise levels may be higher than indicated by a prediction of existing traffic noise levels. However, whilst the presence of other noise sources will be acknowledged in the assessment, given the different characteristics of railway and industrial noise to road traffic noise, in order to ensure a worst-case approach, no attempt to combine noise levels from different sources will be made.”*

This is a fundamental deficiency in the noise assessment for the sector of the scheme between Didcot and Thames River crossing. The study ignores the cumulative noise impact of the road, rail, industrial sidings and road bridge created in the area around Appleford Sidings and alongside Appleford village.

- 3.1.2 Section 10.3.2 of Chapter 10, 5th Bullet indicates a failure to identify tranquil areas, as referred to in the NPPF, alongside the proposed route of the road. There are a number of such areas along the route, for example the Millennium Common between Sutton Courtenay and Appleford, Appleford recreation ground, the wetlands area on the south bank and the Thames Path on the north bank of the River Thames, the countryside east of the Culham Science Centre and north of Clifton Hampden and the woodland of the adjacent Nuneham Courtenay Estate. These amenity areas crossed by public paths provide recreational value at present undisturbed by noise.

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**3.2 ASSESSMENT METHODOLOGY**

3.2.1 Section 10.4.3 of Chapter 10 describes assessment for construction noise. This demonstrates a significant flaw in the assessment methodology. The threshold for significant observed adverse effect level (SOAEL) is dependent on the ambient noise level. This assessment allows areas with high existing ambient noise level to be subject to high additional noise level on top of the ambient noise level. Moreover the selection of LAeq T equivalent continuous A weighed sound pressure level would tend to ignore impulsive and low frequency noise both in the background and in the assessment for the impact of the road. Setting the Lowest Observable Adverse Effect Level (LOAEL) at the existing ambient level fails to recognise that the ambient level may already be above the tolerable level, particularly for a mixed sound environment. Categories A, B, C, of table 10.3 may therefore be inappropriate to define the values of Significant Observed Adverse Effect (SOAEL).

**3.3 APPLICATION OF LA111 NOISE AND VIBRATION, HIGHWAYS ENGLAND.**

3.3.1 Section 10.4.40 describes the magnitude of traffic noise in terms of short and long-term changes in noise level. The report considers short term changes to be the comparison of traffic noise in the opening year with or without the HIF1 road. The assessment, and baseline measurements should relate only to the elevations facing towards the proposed route of the HIF1 road. These elevations do not presently face a road and are not presently subject to road noise. This noise level change should be compared to the magnitude figures, ranging to +5 dB  $La_{10,18h}$  quoted in table 3.54a, of LA111.

3.3.2 For Appleford Sidings, it must be emphasised that any offsetting of noise predicted from the HIF1 road due to the modelled traffic density, without the HIF1, on the B4016 (Main Road) through Appleford road cannot be used from the present traffic model. This is because;

- The present traffic model is deficient, as it fails to include induced traffic on the HIF1 road and fails to allow for traffic restrictions on Main Road.
- The relevant façade for dwellings and gardens faces towards the HIF1 Road but away from Main Road. The loss of amenity for, gardens facing the HIF1 route needs to be identified.

3.3.3 It should also be emphasised that the “Acoustic Context” is relevant to dwellings close to Appleford Sidings. LA111 states “*If a proposed scheme changes the acoustic character of an area. If a scheme introduces road noise into an area where road noise is not currently a major source, it may be appropriate to conclude a minor short-term change is a likely significant effect.*” In this context the short-term change is likely to be a Significant Adverse effect on all west facing dwelling and gardens in Appleford.

Similarly LA111 states that for “*changes to the landscape or setting of a receptor,..... minor change in the short term and/or long term is a likely significant effect*” , Further in-depth noise assessment is required in Appleford.

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3.3.4 With reference to the technical information whereas it is stated that daytime SOAEL is not exceeded in the short term for Appleford receptors, no information on the night-time noise levels in relation to SOAEL is provided.

3.3.5 As both the 2024 do-minimum and the 2024 do-something scenarios have not been adequately considered, additional baseline surveys in Appleford are required.

3.3.6 Highways England LA111 and LA104 require that

“EIA, undertaken in accordance with the EIA Directive 2014/52/EU [Ref 1.N], must include:

- 1) *a description of the main difficulties encountered in compiling the required information; and*
- 2) *the main uncertainties involved in the forecasting methods or evidence.” (...)*

“Reporting of uncertainty should address:

- 1) *the availability and validity of baseline data;*
- 2) *the effect of the passage of time on the validity of data; and*
- 3) *future changes (e.g. project design) that could affect the conclusions of an environmental assessment.”*

The HIF1 Chapter 10 noise assessment only includes a sensitivity test used in relation to the benefits (or lack of, at low speed) of low noise road surfaces. Additional surveys and assessments are required to examine the sensitivity to numerous influences e.g;

- The proposed noise barrier along embankments and bridge at Appleford Sidings will have the unintended adverse consequence of reflecting railway noise and noise from aggregates freight wagons back across to the dwellings to the east of the railway line. This adverse consequence will be significant.
- The noise and vibration noise chapter provides LA111 thresholds for significant adverse effects at night (>55 dB L<sub>night</sub>). No baseline night time information has been provided. It is likely that the acoustically reflective noise barrier could result in rail noise levels which exceed this value.

**3.4 ASSESSMENT ASSUMPTIONS AND LIMITATIONS**

3.4.1 Section 10.5.1 advises that no long-term noise assessment without the HIF1 road has been possible. This is due to the traffic modelling being unable to predict an alternative scenario, without HIF1 road where other road management activities are used to maintain flow on roads with new development advancing up to 2039. This effectively undermines the whole HIF1 road analysis including the noise assessment. The HIF1 road is not demonstrated to be the option, amongst considered alternatives, to deliver the least adverse impact, including the least noise effect on adjacent communities.

**3.65 STUDY AREA**

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3.5.1 Section 10.6 describes the study area. Although the area has been extended to encompass the northern extent up to the junction of the B4015 and the A4074 (Golden Balls Roundabout) the study fails significantly to include affected communities.

- The village of Nuneham Courtenay straddles the A4074, 1.5km north of the Golden balls Roundabout on the main road to Oxford. LA 111 requires that “*Where any do-something absolute noise levels are above the SOAEL, a noise change in the short term of 1.0dB or over results in a likely significant effect.*” The very significant effect on this village from increased traffic, noise and air quality due to the HIF1 road proposal is ignored in the environmental statement. Noise measures are required at along the length of the village, and noise predictions produced to show the impact of funnelling HIF1 traffic from its north east end further north through Nuneham Courtenay.-
- Noise monitoring has not been undertaken at significant locations affected by the HIF1 road proposal including the full extent of Main Road & Chambrai Road, Appleford, properties in Sutton Courtenay along the B4016 (Church Street), properties along the Tollgate road at Culham , properties along High Street in Long Wittenham , Home Farm & the Coppice Clifton Hampden , Burcot and surrounding properties on the A415.

In the absence of these important data the noise assessment is incomplete and cannot be used to support the proposed HIF1 road.

**3.6 BASELINE CONDITIONS**

3.6.1 Section 10.7.15 acknowledges that Noise Important Areas (NIA) will be affected by the HIF1 road proposal:

- In Clifton Hampden, road noise on the A415 near Watery Lane (ID 13243)
- In Appleford, rail noise at Appleford Sidings (ID 564)
- A34 road noise at Milton Height (ID4187)

For all locations the noise assessment dismisses the need to particularise the noise impact of the HIF1 road on these vulnerable locations. The noise assessment is deficient in assessing the impact of the HIF1 road.

3.6.2 Section 10.7.17 indicates a noise baseline survey at a limited number (only 12), monitoring locations. At the one location near Appleford Sidings (M12) it was noted that the noise level was elevated by 6dB above the prediction for road traffic. Whilst it was recognised that train and industrial noise and HGV access to the landfill site was present no attempt was made to distinguish the characteristics of the noise, its impulse and tone or to attribute the various sources of the noise. As this is one of the affected NIAs this is a serious omission and undermines the assessment of the effect of the HIF1 road at this location. The conclusion that “*the noise model developed to estimate traffic noise ....is robust*” cannot be sustained.

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An extended baseline noise survey should have been provided across all vulnerable locations facing the HIF1 Route, to quantify the current levels. The primary data should have been made available for scrutiny with mapped locations, photographic records, and microphone heights.

**3.7 POTENTIAL IMPACTS**

3.7.1 Section 10.8.5 describes the potential traffic noise impacts of the HIF1 road. The assertion that *“The scheme will alleviate traffic flows on the existing route, through Appleford, Sutton Courtenay, Culham, and Long Wittenham, through Burcot and the centre of Clifton Hampden”* is misleading. The statement is premised on traffic modelling that has now been shown to be incapable of representing comparative alleviation of traffic flows in these location for alternatives without the HIF1 road in place.

3.7.2 Baseline noise measurements within Clifton Hampden suggest very low sound levels (M10 Woodfield House, Clifton Hampden) 48 dB LA10,18h. with probable low levels at other dwellings. The proposed scheme could result in a change in the amenity levels within gardens. BS8233:2014 recommends that *“For traditional external areas that are used for amenity space, such as gardens and patios, it is desirable that the external noise level does not exceed 50 dB LAeq,T* (for non-noisier environments). Further baseline measurements and further noise predictions are required throughout Clifton Hampden. It is likely that the HIF1 road will have adverse effects both in terms of changing the character of the area as well as exceeding recommended desirable garden noise standards.

**3.8 DESIGN MITIGATION AND ENHANCEMENT MEASURES**

3.8.1 Section 10.9.3 states that construction working hours for the Scheme will be 7:30-18:00 hr weekdays 08:00-13:00 hrs Saturday, with limited out of hours working. However elsewhere it is asserted that the bridge at Appleford Sidings will be constructed out of hours to accommodate the industrial operator. This operator has applied for working hours between 6:00hrs -22:30hr weekdays (16.5 hrs) and a Saturday extension (11hrs). The bridge construction will impose industrial noise for 24 hours a day on the affected residents of Appleford.

3.8.2 Section 10.9.6 makes the statement *“Closely aligning (the Scheme) to existing noise sources (the Great Western Railway) reduces the potential increase in noise levels”*. This statement fails to distinguish the different characteristics and quality of road and rail noise. It is quite likely that road noise added to rail noise would result in potentially severe noise effects, and negative impact on the health and wellbeing of residents .

3.8.3 In section 10.9.8, the statement that *“The scheme has been relocated further west away from Appleford and Zouch Farm compared with.... the proposed alignment in 2018”* ignores the proximity of the Scheme at to the southern portion of Appleford which remains within 60m of the Scheme. The noise impact of this proximity has not been examined.

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3.8.4 Section 10.9.9 refers to moving the “Clifton Hampden bypass” .....*slightly further north away from the Village.*” And a speed limit reduction. The following section acknowledges that this is insufficient to reduce noise emissions to acceptable levels.

3.8.5 Section 10.9.12 itemises extensive noise barriers proposed alongside the HIF1 road where it passes close to existing communities. This is a clear admission that the proximity of the road to these communities will generate unacceptable noise levels. The detrimental visual intrusion of the road edge noise barriers indicates an unsatisfactory attempt at a correction to an erroneous alignment of the HIF1 road at the following positions:

- 3.0m barrier to the south and over the bridge at Appleford Sidings (resulting in a total barriers height of 11m above garden level of adjacent dwellings.
- 2.5m barrier between Appleford Sidings and the junction with Appleford Road (B4016).
- 1.5m barrier over the Thames crossing bridge.
- 3.0m barrier at Fullamore Cottages, Clifton Hampden
- 3.0m barrier to the north of Clifton Hampden to the B4015.

There has been no demonstration that the road with noise barriers provides an acceptable noise, visual and landscape solution in any of these locations.

3.8.6 LA 111 requires “*The suitability of each potential mitigation measure for use within the project area shall be determined based on the following criteria:*

3) *the benefit of a measure in terms of elimination of likely significant effects;”:*

The HIF1 road does not meet this objective. Likely significant effects of mitigation measures have not been eliminated, e.g. reflectance of train noise at Appleford Sidings.

5) *the impact of the measure across other environmental factors, for example the visual impact of a noise barrier.”*

The HIF1 road proposal has not addressed this objective. There are significant landscape and visual adverse effects.

3.8.7 Section 10.9.13 indicates that low noise road surfacing is proposed for the locations listed above. However elsewhere it is admitted that this not effective for traffic speeds below 75 K/hr. The modelling assumption (Appendix 10.4) for <75 k/hr allows no sound reduction due to low noise surfacing. This measure will be marginal or ineffective. The environmental implications, e.g. particulate emissions from tyres and road surface for this grade of surface has not been explored.

**3.9 ASSESSMENT OF LIKELY SIGNIFICANT EFFECTS**

3.9.1 In section 10.10.5, 7<sup>th</sup>, 8<sup>th</sup> 9<sup>th</sup> bullet points describe the construction noise effect resulting from the construction of embankments, bridge and road over Appleford Sidings. This asserts

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that *“the anticipated duration of the evening and night time Appleford rail sidings bridge work are very low, well below the DMRB criterion of 10 or more working days or evening/weekend or nights in any 15 consecutive days.”* This is not substantiated by the complexity of the proposed construction , involving embankments, retaining structures, piles and bridge works and the challenge of construction over an operating industrial site with freight train movements . The construction noise effect is likely to be significant adverse and prolonged with much extended overnight and weekend working.

It is likely that there will be a major impact above the SOAEL, continuously for many months, well above the DMRB criteria. No realist assessment of the noise consequences has been undertaken.

3.9.2 Section 10.10.24ff summarises the short-term change in predicted traffic noise. It must be emphasised that all statements are predicated on:

- A traffic modelling exercise that is shown to be deficient in representing options and in representing the resulting traffic on village roads around the HIF1 road..
- A noise prediction program that is calibrated on a very localised and limited actual measurements.

The predicted noise levels cannot therefore be considered as representing the range of noise disturbance or benefit that will actually occur if the HIF1 road is built.

The statement that *“traffic noise reduction...in the scheme opening year... is due to the diversion of traffic off existing routes through villages ...”* is a speculative assertion and cannot be held to be accurate.

3.9.3 Section 10.10.31ff summarises the long term predicted change in traffic noise. The comments on short term predictions apply. No comparison with traffic in 2039 without the HIF1 road was possible, due to strategic and modelling deficiencies.

3.9.4 Table 10.14 provides a summary of operational traffic environmental effects. The short term and long term effects, do not demonstrate that optional appraisals of road alignments and alternative strategies have been undertaken to achieve the objective that avoids significant adverse noise impacts to communities affected by the strategy.

The assertions of “significant benefit” in locations such as “Appleford 79 properties close to the B4026” is a computer prediction based upon the traffic modelling prediction of increased traffic without the HIF1 road. The traffic modelling ignores the alternative strategies of traffic management to reduce traffic across the network. The assertion is therefore not based on any sound evidence and cannot be supported.

However, it is clear that locations currently not facing an arterial road but which will do so under the HIF road proposal will suffer “significant adverse” noise effects as recognised in

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table 10.14. Listed Appleford properties on southern Main Road, Fullamore Cottages, properties in north and north east Clifton Hampden, properties up to the Golden Balls roundabout, will all suffer more noise due to the proximity of the HIF1 road . The degree of increase is uncertain, since it can only be estimated by monitoring, at all these locations, the current noise characteristics at the elevations facing the HIF1 proposed road alignment and then adding the predicted noise due to the new HIF1 road. This has not been done. The table indicates that in these locations 3m, and 2.5m high noise barriers will be erected. It is recognised in landscape terms barriers will not be an acceptable feature, neither in open fields and woodland at Clifton Hampden nor rising above the 8m high bridge and embankments at Appleford Sidings.

The adverse effects of increased traffic and noise of the proposed HIF1 road on the community of Nuneham Courtenay is not included at all in the noise assessment.

3.9.5 Section 10.10.41 asserts that “*no significant effects have been identified at public open green spaces.*” The this ignores the noise impact of the HIF1 road proposal on Appleford Allotments, Appleford Playing field, the Millennium Common, and the wetlands south of the Thames, all located in close proximity to the proposed road. Likewise, the noise assessment fails to judge the scale of the noise from the HIF1 road on the Thames Path on the north bank; the network of Public Rights of Way (PROWs) between Sutton Courtenay and Appleford; the network of Green Belt footpaths around Clifton Hampden and the Nuneham Courtenay Estate. The assessment significantly underestimates the serious intrusion of the HIF1 Road on these tranquil areas.

3.9.6 Section 10.10.54 -10.10.65 seeks to explain that the operation of the road Scheme will meet the aim of the Noise Policy Statement for England 2010 (NPSE) assessed against the guidance of DMRB LA 111. The first aim of the NPSE is to avoid significant adverse noise impacts on health and quality of life. However, as this noise report makes clear, seeking transport management solutions to growth around Didcot, on the basis of avoiding adverse noise was not it’s brief. Only 3 alternative scenarios were examined, initially with and without the HIF1 road and again with the road after 15 years. This lack of examination of other solutions to the management of growth appears to be a fundamental failure of the initial briefing by OCC. This is compounded by the limitations of the Paramics traffic model which appears unable to model other influences on car use (e.g., from demography to fuel costs, availability of public transport and traffic management schemes).

The implicit assumption in the noise and traffic modelling is that with or without the HIF1 road, no surrounding roads will have any traffic management schemes put in place in the future to protect adjacent communities. Thus, the solecistic conclusion is reached that the HIF1 road will lead to reductions in traffic and noise on village roads.

In view of the limited scope of the noise assessment in exploring and identifying the preferred development option for traffic management around Didcot to achieve lowest noise levels below the SOAEL, it cannot be said that the scheme meets the requirement to

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*“avoid significant adverse impacts on health and wellbeing”* . The scheme does not comply with aim 1 of the NPSE.

3.9.7 Section 10.10.66 seeks to explain that the scheme meets the second aim of the NPSE to mitigate and minimise adverse impacts on health and quality of life. It is apparent that, due to the excessive traffic noise that the HIF1 Road will create at neighbouring communities, noise mitigation measures are needed. The principal mitigation measure of distance, aligning the road away from communities, is not considered. Given the open terrain of much of the route between North Didcot and Clifton Hampden this is unconscionable. The mitigation is limited to low noise surfaces and 3,0m high fence noise barriers. These mitigations do not meet the second aim of the NPSE because:

- The effect of low noise surface is not recognised, in LA 111 2020 as effective for vehicle speeds below 75K/hr. Moreover, this only deals with tyre noise and ignores engine & exhaust noise, aerodynamic noise, air brakes, acceleration / deceleration.
- The height and type of noise barrier is a compromise. Whilst the noise assessment examined the preference for 4.0m high barriers (Section 10.10.68) the reduction to 3.0m was to ameliorate the visual and landscape damage. However, the impact at the locations of Appleford and Clifton Hampden remains intrusive and severe. The noise barriers will dominate the skyline.
- LA111 provides advice on other measures, such as vertical and horizontal alignment of a road, earth bunds, speed limits, restrictions on noisy vehicle types. None of these alternatives has been investigated.

Viewing the total, cumulative impacts of the Scheme in terms of noise, landscape and visual intrusion, the proposed measures do not mitigate the adverse impacts of the HIF1 road and cannot be said to meet the second aim of the NPSE.

3.9.8 The third aim of the NPSE is to contribute to the improvement of health and quality of life. Meeting this aim would require the scheme to have an objective to reduce the level of noise experienced in the area of the scheme. The proposal to build an arterial road increases noise in existing and proposed communities along its length. It has not been demonstrated that the proposed HIF1 road provides an enhancement to the health of those communities. As it has not been demonstrated that the HIF1 proposal meets the first or second aim of the NPSE, it follows that the HIF1 road is not shown to meet the third aim of the NPSE.

3.9.9 Reference in section 10.10.71 & 10.12.4 to reduction in traffic noise due to the HIF1 road fails to acknowledge alternative traffic management schemes in these locations to restrict noise without the imposition of arterial road traffic through and around these neighbourhoods.