

**THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT GARDEN TOWN
HIGHWAYS INFRASTRUCTURE – A4130 IMPROVEMENT (MILTON GATE
TO COLLETT ROUNDABOUT), A4197 DIDCOT TO CULHAM LINK ROAD,
AND A415 CLIFTON HAMPDEN BYPASS) COMPULSORY PURCHASE
ORDER 2022**

**THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT TO CULHAM THAMES
BRIDGE) SCHEME 2022**

**THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT GARDEN TOWN
HIGHWAYS INFRASTRUCTURE – A4130 IMPROVEMENT (MILTON GATE
TO COLLETT ROUNDABOUT), A4197 DIDCOT TO CULHAM LINK ROAD,
AND A415 CLIFTON HAMPDEN BYPASS) (SIDE ROADS) ORDER 2022**

**THE CALLED-IN PLANNING APPLICATION BY OXFORDSHIRE 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)**

PLANNING INSPECTORATE REFERENCE:

APP/U3100/V/23/3326625 and NATTRAN/SE/HAO/286 (DPI/U3100/23/12)

**Proof of evidence of
JOHN PATRICK DISLEY
(Local Transport and Connectivity Plan)**

Note: This proof of evidence is of primary relevance to the Inquiry into the called-in Planning Application, but also addresses objections raised by remaining Objectors to the Orders in Section 3 of this proof of evidence.

1 INTRODUCTION AND QUALIFICATIONS

- 1.1 I am John Patrick Disley and I am Head of Transport Policy at Oxfordshire County Council, where I have worked for almost 30 years in transport planning, with 20 of those years in senior management roles. I have a MSc in Transport Planning & Engineering.
- 1.2 I have been in my current role as Head of Transport Policy since June 2022, prior to which I held the positions of Infrastructure Strategy & Policy Manager (2018-2022) and Policy & Strategy Manager (2013-2018) in the Transport Service. In all of these roles, I have been the professional lead on the development and implementation of transport policy and strategy for Oxfordshire. This includes responsibility for the Oxfordshire County Council's Local Transport and Connectivity Plan (**LTCP**) (and the Local Transport Plan (**LTP4**) prior to this), Area and Corridor Travel Plans, Public Transport (including Bus Partnership, Bus Service Improvement Plan and Rail Strategy), Active Travel, Travel Planning, Regional Transport and Freight Strategies. The current Transport Policy service has over 30 professional specialists working in six teams to fulfil these responsibilities.

Scope of Evidence

- 1.3 This proof of evidence has been prepared regarding transport planning matters relating to:
- 1.3.1 The called-in planning application by Oxfordshire 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) (the **Planning Application**);
- 1.3.2 The Oxfordshire County Council (Didcot Garden Town Highways Infrastructure – A4130 Improvement (Milton to Collett Roundabout), A4197 Didcot to Culham Link Road, and A415 Clifton Hampden Bypass) Compulsory Purchase Order 2022 (the **CPO**);
- 1.3.3 The Oxfordshire County Council (Didcot to Culham Thames Bridge) Scheme 2022 (the **Bridge Scheme**); and
- 1.3.4 The Oxfordshire County Council (Didcot Garden Town Highways Infrastructure– A4130 Improvement (Milton to Collett Roundabout), A4197 Didcot to Culham Link Road, and A415 Clifton Hampden Bypass) (Side Roads) Order 2022 (the **SRO**) (the CPO, SRO and Bridge Scheme, taken together, are referred to as the **Orders**).
- 1.4 The Planning Application was submitted, and the Orders were made, to facilitate the delivery of the Access to Didcot Garden Town Highway Improvements (the **Scheme**) which consists of a highway scheme approximately 11km in length, including converting 1.8km of single carriageway to dual carriageway, 6.8km of new single carriageway and approximately 20km of new and/or improved off-carriageway cycling and pedestrian infrastructure. Connections into the existing public rights of way network will also be provided. The Scheme also includes three over bridges.
- 1.5 The Orders were made by Oxfordshire County Council in its capacity as acquiring authority (the **Acquiring Authority**) on 21 December 2022 and submitted to the Secretary of State for Transport on 26 January 2023.
- 1.6 The Planning Application was submitted to the LPA by Oxfordshire County Council in its capacity as applicant (the **Applicant**) on 4 October 2021 and called-in by the Secretary of State for Levelling Up, Housing and Communities for his determination on 25 July 2023.

- 1.7 The Planning Application and the Orders are now due to be considered by an Inspector, Lesley Coffey at conjoined Public Inquiries scheduled to open on 20 February 2024. This proof of evidence has been prepared in connection with those Inquiries.
- 1.8 Oxfordshire County Council's Planning & Regulation (P&R) Committee, at its meeting on 17 and 18 July 2023, had considered an officer report which recommended approval to the Planning Application. P&R Committee disagreed with the officer's recommendation and sought to resolve to refuse the Planning Application on 18 July 2023; however, the Planning Application was called-in for the determination of the Secretary of State for Levelling Up, Housing and Communities and so the Planning Application remains undetermined. In the deliberations and subsequent minutes [CD F.2], P&R Committee referred to a number of reasons why they were opposed to the Planning Application at that time (July 2023).
- 1.9 Of relevance to LTCP is proposed reason for refusal 8:
- "Reason 8. Conflict with policy of the Council's Local Transport and Connectivity Plan 2022 – 2050 (LTCP)"*
- 1.10 Specifically, as outlined in the Oxfordshire County Council Statement of Case of the Local Planning Authority (**LPA**) [CD L.2, paragraph 1.6]:
- "...whilst not directly opposing the application on this point, instead to set out the committee's concerns with regard to how the applicant had approached the traffic modelling for a new road scheme contrary to the policies of the LTCP and ask that, in reaching their recommendation to the Secretary of State, the inspector should only recommend approval to the application if they were satisfied that, having considered the evidence put forward, the traffic modelling for the proposed new road had adopted a 'Decide and Provide' approach or that, if it was concluded it had not or had done so inadequately, that this did not outweigh the strong support for the development provided in the development plan as a matter of principle and that it was necessary therefore to accept it if the spatial strategy was to be delivered and the aims of chapters 5 and 6 of the NPPF were to be met."*
- 1.11 Paragraphs 2.47 and 2.54 of the LPA Statement of Case [CD L.2] give further detail on proposed reason for refusal 8.
- 1.12 The purpose of my evidence is to explain the relevance of the LTCP [CD G.4] to the Scheme, demonstrate how, overall, the Scheme complies with and supports LTCP and the policies it includes, and respond to concerns raised that allege that the Scheme conflicts with the LTCP.
- 1.13 My proof of evidence should be read in conjunction with other separate but interrelated proofs of evidence submitted on behalf of the Council, including:
- 1.13.1 Strategic Need and Benefits, Highway Issues, Scheme Selection and Alternatives, prepared by Aron Wisdom of Oxfordshire County Council;
 - 1.13.2 Technical Traffic and Highways Engineering – A4130 Widening and Didcot Science Bridge, prepared by Andrew Blanchard of AECOM;
 - 1.13.3 Technical Traffic and Highways Engineering - Culham River Crossing and Clifton Hampden Bypass, prepared by Karl Chan of AECOM;
 - 1.13.4 Traffic Modelling, prepared by Claudia Currie of AtkinsRéalis;
 - 1.13.5 Environmental Impact Assessment, prepared by Alex Maddox of AECOM;
 - 1.13.6 Noise and Vibration, prepared by Andrew Pagett of AECOM;
 - 1.13.7 Air Quality, prepared by Anna Savage of AECOM;

- 1.13.8 Climate Change, prepared by Chris Landsburgh of AECOM;
- 1.13.9 Landscape and Visual Impact, prepared by Jane Ash of AECOM;
- 1.13.10 Planning, prepared by Bernard Greep of Stantec;
- 1.13.11 Negotiations and Acquisition prepared by Steven Moon of Gateley Hamer;
and
- 1.13.12 Compulsory Purchase Justification prepared by Timothy Mann of
Oxfordshire County Council.

2 THE RELEVANCE OF THE LTCP [CD G.4]

2.1 This section summarises the LTCP and sets out how the Scheme is compliant with the LTCP and the Vision, Objectives and Policies it contains.

2.2 The LTCP is Oxfordshire's statutory Local Transport Plan, adopted by Full Council in July 2022, meeting the requirements of the Transport Act 2000. The LTCP is the Council's fifth local transport plan and replaces the previous Local Transport Plan 4 (**LTP4**) [CD G.5], which was adopted in September 2015 and updated in 2016. The LTCP covers the time period up to 2050.

2.3 The LTCP was developed over an extensive period between 2019 and 2022, which included a number of engagement and consultation exercises. In summary, the stages of LTCP development conducted were:

- Stage 1 – Topic Papers (Engagement in March 2020)
- Stage 2 – Development of Vision Document (Public consultation in February 2021)
- Stage 3 – Development of LTCP and supporting documents (Public consultation in January 2022)

These all fed into the approval of the final document in June 2022 and its adoption by Full Council in July 2022.

LCTP Vision

2.4 The LTCP Vision (set out on page 31 of the published Plan) outlines a clear long-term ambition for transport in Oxfordshire, as follows:

“Our Local Transport and Connectivity Plan vision is for an inclusive and safe net-zero Oxfordshire transport system that enables all parts of the county to thrive.

It will tackle inequality, be better for health, wellbeing and social inclusivity and have zero road fatalities or life-changing injuries. It will also enhance our natural and historic environment and enable the county to be one of the world's leading innovation economies.

Our plan sets out to achieve this by reducing the need to travel and private car use through making walking, cycling, public and shared transport the natural first choice.”

2.5 The Scheme contributes to this vision by:

2.5.1 Providing a road network which will support housing and employment allocations and growth, so “*enabling the county to thrive*” and “*to be one of the world's leading innovation economies*”

2.5.2 Providing significant dedicated infrastructure for Active Travel and highway infrastructure which enables enhanced bus connectivity

2.5.3 Enhancing the resilience of the transport network in the area

2.6 Detail on the evidence on the need for the Scheme, how it supports delivery of housing and employment growth and network resilience is set out in section 6 of the proof of evidence of Aron Wisdom.

LTCP and Council Priorities

2.7 The LTCP aligns with and helps to achieve Oxfordshire County Council's strategic priorities as set out in the County Council's adopted Strategic Plan 2023-2025 [Appendix JD2.1 – page 4], which lists Oxfordshire County Council's nine strategic priorities. The LTCP is particularly critical to delivering the following four strategic priorities:

- 2.7.1 Put action to address the climate emergency at the heart of our work;
 - 2.7.2 Tackle inequalities in Oxfordshire;
 - 2.7.3 Prioritise the health and wellbeing of residents; and
 - 2.7.4 Invest in an inclusive, integrated and sustainable transport network.
- 2.8 The Scheme particularly supports the last of these strategic priorities - *invest in an inclusive, integrated and sustainable transport network* - by providing dedicated transport infrastructure, which supports better and safer travel by all modes of transport.

LTCP Themes and Outcomes

- 2.9 LTCP contains a series of themes covering environment, health, connectivity, productivity, inclusivity and Healthy Place shaping, focused on meeting the following outcomes:
- 2.9.1 **Theme: Environment.** *Outcome:* Sustainable communities that are resilient to climate change, enhance the natural and historic environment, improve biodiversity, reduce greenhouse gas emissions and are supported by our net-zero transport network.
 - 2.9.2 **Theme: Health.** *Outcome:* Improved health and wellbeing and reduced health inequalities, enabled through active and healthy lifestyles, improved road safety and inclusive communities.
 - 2.9.3 **Theme: Healthy place shaping.** *Outcome:* Sustainable, well designed, thriving communities where healthy behaviours are the norm and which provide a sense of belonging, identity and community.
 - 2.9.4 **Theme: Productivity.** *Outcome:* A world leading business base that is sustainable, has created new jobs, products and careers for all communities and is supported by an effective, net-zero transport network.
 - 2.9.5 **Theme: Connectivity.** *Outcome:* Communities are digitally connected, innovative technologies are supported and there is improved connectivity and mobility across the county, enabling greater choice and seamless interchange between sustainable modes.
 - 2.9.6 **Theme: Inclusivity.** *Outcome:* Barriers to access are removed and all communities are supported by our inclusive transport system to play a full role in society and have independence, choice and control.
- 2.10 The Scheme directly contributes to these themes, particularly the following:
- 2.10.1 Environment – resilience to climate change through the provision of new transport network capacity, reducing reliance on existing, constrained highway networks and enabling more walking and cycling and public transport, which is a climate benefit;
 - 2.10.2 Health – by providing new and better infrastructure to support Active Travel and improve road safety;
 - 2.10.3 Productivity – connectivity to housing and employment development;
 - 2.10.4 Connectivity – enhanced connectivity for and between all modes of transport.

LTCP Targets

- 2.11 LTCP includes a set of headline targets, in order to track delivery of the vision and key themes that the LTCP includes. These targets are set out in the LTCP (CD G.4, page 33) and are reproduced below:
 - 2.11.1 By 2030, our targets are to:
 - Replace or remove 1 out of every 4 current car trips in Oxfordshire
 - Increase the number of cycle trips in Oxfordshire from 600,000 to 1 million cycle trips per week
 - Reduce road fatalities or life changing injuries by 50%
 - 2.11.2 By 2040, our targets are to:
 - Deliver a net-zero transport network
 - Replace or remove an additional 1 out of 3 car trips in Oxfordshire
 - 2.11.3 By 2050, our targets are to:
 - Deliver a transport network that contributes to a climate positive future
 - Have zero, or as close as possible, road fatalities or life-changing injuries
- 2.12 It must be borne in mind that these targets are for the LTCP as a whole, rather than targets that all of its strategies, schemes and measures are required or committed to meet.
- 2.13 Further and in any event, the Scheme will contribute to LTCP car trip reduction and modal shift targets through the provision of dedicated infrastructure for non-car modes of travel.
- 2.14 For Active Travel, the Scheme’s provision for cycling and walking will directly support the targets set out in the LTCP (see paragraph 2.11.1 above), to increase cycle trips and help reduce road fatalities and life-changing injuries.
- 2.15 For public transport, the Scheme will support improved bus services and better bus connectivity, and help safeguard the future of the bus network in this area. The call-in representation by Luke Marion, Managing Director of the Oxford Bus Company and Thames Travel (the principal operator of bus services in this area) [CD N.7] makes it very clear (page 3 of this representation) that *“without the timely delivery of the proposals, the level and quality of bus service both current and in the future, would be placed in very serious peril”*. I expand on this point in paragraph 2.29 to 2.31 of my evidence.
- 2.16 The ES climate change assessments [CD A.15, Chapter 15 Climate] also state that the operational emissions of the Scheme will be lower with the Scheme than without it, so once in place it would contribute positively to meeting the net zero and climate positive objectives outlined in paragraphs 2.11.2 and 2.11.3 above.

LTCP Policies

- 2.17 The LTCP also includes a comprehensive set of 54 policies covering all aspects of transport. These include policies covering Walking and Cycling, Road Safety, Public Transport, Congestion Management and Local Connectivity, all of which the Scheme contributes to. The main policies which the Scheme supports are listed below:

Policy Area	Policy No	Policy Title
Walking and Cycling	1	Transport User Hierarchy
	2	Cycle and Walking Networks
	3	Local Cycling and Walking Infrastructure Plans
	4	Strategic Active Travel Network

Road Safety	15	Vision Zero
Public Transport	18 21 22	Bus Strategy Rail Strategy Multi-mode Travel
Network, Parking and Congestion Management	31 36	Network Management Road Schemes
Local Connectivity	52 54	Area Transport Strategies Rural Journeys

2.18 The sections below deal with how the Scheme meets or contributes to each of these LTCP policy areas.

Walking and Cycling

2.19 This section demonstrates how the Scheme supports Active Travel and the opportunity for more trips to be made by Active Travel modes, both directly (via infrastructure provision) and indirectly via it forming part of the wider transport planning proposals for the Didcot Area, which it helps to enable.

2.20 The LTCP [CD G.4, Page 37, Policy 1] states that, *“the transport user hierarchy will ensure that future transport schemes consider walking, cycling, public and shared transport before the private car. This will deliver infrastructure that enables people of all abilities to travel without being dependent on a car ... the hierarchy recognises that private cars will still play a role in Oxfordshire’s future transport network.”*

2.21 The Scheme clearly and demonstrably provides for all modes in the hierarchy, with dedicated infrastructure for Active Travel. It creates new public transport links, as well as providing a better route for car trips, i.e., that other benefits would result from opportunities created on the existing network arising from the re-routing of car trips onto the Scheme itself.

2.22 It is very important that the Scheme should not be interpreted as solely a ‘road for cars’. The Planning Application documents and description of the Scheme make it clear that the Scheme provides very high quality walking and cycling infrastructure, directly linking many of the growth areas to both existing locations and other growth areas. This is discussed further in Aron Wisdom’s proof of evidence.

2.23 These elements of the Scheme are a key element of the ‘decide and provide’ methodology used, whereby up to date national design guidance for walking and cycling infrastructure (Local Transport Note 1/20 Cycle Infrastructure Design) has been used in the design of the Scheme, to ensure the proposals are attractive and help to engender modal shift in this area.

2.24 It can therefore be demonstrated that the Scheme directly contributes to LTCP Policy 2 [CD G.4, Page 40] through the provision of significant, dedicated infrastructure for Active Travel, which would form part of the Didcot area Active Travel Network, enhancing connectivity between Didcot and the surrounding area.

2.25 In addition, the emerging Didcot Area Travel Plan and the proposals it would include would complement the Scheme by including Active Travel, Public Transport and other supporting schemes and measures, some of which can be realised as a result of the infrastructure which the Scheme will provide.

2.26 The Didcot Area Travel Plan will include plans and schemes for dedicated Active Travel provision, as outlined and included in the Didcot Local Cycling and Walking Infrastructure

Plan (approved by the Council in December 2023) [CD G.4.1], which includes the walking cycling provisions delivered by the Scheme, and the Science Vale Active Travel Network (Phase 1 of which has been completed, with future phases planned and under development). The Science Vale Active Travel Network is now being incorporated into the Oxfordshire Strategic Active Travel Network (under development for consideration by the County Council's Cabinet in Spring 2024).

2.27 Together, this demonstrates how the Scheme directly supports the LTCP Walking and Cycling Policies, listed in the table above, as follows:

- 2.27.1 Policy 1 (Transport User Hierarchy)
- 2.27.2 Policy 2 (Develop Comprehensive Walking and Cycling Networks)
- 2.27.3 Policy 3 (Develop Local Cycling and Walking Infrastructure Plans (LCWIPs) for all main urban settlements)
- 2.27.4 Policy 4 (Develop a Strategic Active Travel Network in order to identify key routes for walking and cycling between destinations across the county and prioritise interventions to existing and new infrastructure, and identify and support all opportunities to develop and link up the Strategic Active Travel Network in new developments, rural and major roadworks and road schemes)

Road Safety

2.28 The Scheme will contribute to better Road Safety outcomes and LTCP Policy 15 (on Vision Zero) [CD G.4, page 65] in the Didcot area in the following ways:

- 2.28.1 By providing dedicated high-quality walking and cycling infrastructure informed by modern design guidance, including safe crossing facilities. More information regarding the Scheme's walking and cycling provision, and comparisons to the existing low-quality and/or non-existent provision, is provided in the evidence of Aron Wisdom.
- 2.28.2 By ensuring that the road elements of the Scheme have been informed by modern design standards, which take account of elements that are important for safety, such as visibility at junctions.
- 2.28.3 By providing a more suitable, alternative route to the existing routes through villages, which in many cases are narrow and have low-quality or no walking and cycling provision. The alternative route provided by the Scheme enables reductions in traffic flow through the villages, which would improve road safety and perception of safety. An example of this is in Clifton Hampden, where the Scheme reduces traffic flows on the two roads adjacent to Clifton Hampden C of E Primary School.

Public Transport

2.29 The Scheme will also enable additional connectivity for existing and future/proposed bus services. Whilst the details of this, including links to Culham Science Centre and the Railway Station, are set out in Aron Wisdom's evidence, the points set out below demonstrate the crucial importance of the Scheme to the current and future strategic and local bus network. Future bus service proposals are being developed as part of the emerging Didcot Area Travel Plan proposals.

2.30 As referenced in paragraph 2.15, it can clearly be demonstrated that the Scheme is essential to the success of delivering future bus services in this area. The extracts below from the call-in representation of 26 September 2023 from Luke Marion, Managing Director of Oxford Bus Company and Thames Travel [CD N.7] clearly explain the highway performance challenges faced by the main bus operator in this area.

2.30.1 *"The chronic congestion and delay that arise have a particularly serious impact on bus service delivery:*

- Buses cannot reassign route when particularly severe delay is encountered, unlike most other traffic.

- There is a wide and increasing variability in delay, which is quite unpredictable. In practical terms it is impossible to schedule for extreme delay... such a timetable would be irrelevant to the public. However, it makes it impossible to avoid buses on occasions being very late, with resulting knock-on issues.

- Notwithstanding the above, we have a statutory duty under the Transport Act 1985 to run on time and reliably. Strict punctuality standards are set out by the Traffic Commissioners. To meet these standards, we account for the bulk of reasonably foreseeable delays, which means on many occasions, to avoid buses running early, they must "wait time" when traffic is more freely flowing than usual. This is a substantial drain on operating efficiency and resources, and also greatly exasperates the travelling public, reducing the attractiveness and potential of bus services in the area."

2.30.2 Luke Marion goes on to explain how elements of the Scheme directly improve the highway operation, and therefore bus routes:

- "However, the main public transport movement is east to west across the A4130 between Basil Hill Road and Milton Road. This is the busiest bus corridor in South Oxfordshire by a considerable margin, being the main link between Didcot station and town centre, and Milton Park. Services operate as frequently as every 5 minutes in each direction across the junction at peak time, something typically only seen in dense metropolitan contexts. Beyond Milton Park most of these services continue to provide links to Wantage, Abingdon and Oxford, as well as the wider Science Vale UK. Each and every bus route serving Science Vale UK that we operate runs across this roundabout at some point, with one minor exception. Disruption and delay here thus adversely affects our entire operation.

- There is no credible means of providing relief to this area without the scheme. The A4130 rail overbridge and the proximity of the roundabouts to it at either end create obvious multiple serious engineering constraints to an on-line improvement."

- "It is the absence of regular links across the Thames towards Culham and South Oxford, including the Oxford Eastern Arc from Didcot and committed developments to the north that is the main issue here. These form a key element of a sustainable connectivity and movement strategy in support of the SOLP2035, and are also featured in the current County LTCP5 as well as its predecessor. Notwithstanding these policy aspirations, chronic congestion on the approaches to the existing river crossings make it all but impossible to envisage their implementation in a form that would be relevant to the public, sufficiently reliable, and commercially sustainable in the longer term. Without these links, major development north of Didcot, at Culham, and potentially at Berinsfield cannot be anything other than greatly more car-dependent than it ought to be."

- "This package of bus service improvements represents one of the most ambitious public transport network interventions anywhere in the County, or, for that matter, in Southern England. They would transform the options for current and future residents of Didcot and wider South Oxfordshire to reach key employment destinations at Culham Science Centre, ARC Oxford, Oxford Science Park and the East Oxford research hospitals. Equally, in the opposite sense, the new bus routes that the scheme would facilitate would provide crucial connectivity from large parts of Oxford including the key knowledge and research sites mentioned above, to other parts of the Science Vale UK cluster, helping to facilitate the agglomeration benefits of the cluster in a radically more sustainable manner.

- The services involved are relatively long distance and by their nature, need to be reasonably competitive against driving a private vehicle both on frequency and journey time. To be economic to provide, buses must be able to make consistent swift progress. Only the scheme proposals can facilitate this."

- 2.31 From the above paragraphs, it is very clear that this operator views the Scheme as essential to the future operation of bus services in the area, and to reduce car dependency, strongly supporting the overall 'decide and provide' approach taken in the Scheme and LTCP car reduction targets.
- 2.32 The Scheme is also instrumental in supporting future development of rail in this area. In particular, Culham Railway Station has the potential to be significantly redeveloped as a result of the envisaged rail service frequency and connectivity enhancements. These would arise from – and are dependent in part on - the approved South Oxfordshire Local Plan housing and employment development (located respectively on the western and eastern sides of the existing station site), which the Scheme would facilitate. Without these developments, the case for these enhancements would be much weaker.
- 2.33 The redevelopment of Culham Rail Station as a major transport / mobility hub – one of the seven main rail hubs identified in the Oxfordshire Rail Corridor Study [CD G.17] – will facilitate opportunities for enhanced and additional rail services to serve the station. These potentially include extension of east-west rail services and/or new rail connectivity being developed, including a new service directly linking Bristol to Oxford. It would also facilitate new and improved bus services to the station.
- 2.34 The above paragraphs therefore demonstrate how the Scheme directly supports LTCP Public Transport Policies, as follows:
- 2.34.1 Policy 18 (Bus Strategy, in particular 18(c) which *"seeks to make the bus a natural first choice through development of infrastructure and network management measures which give priority over the private car and improve journey speeds"*, and 18(e) *"ensure that all new strategic development is designed for bus access"*)
- 2.34.2 Policy 21 (Rail Strategy)
- 2.34.3 Policy 22 (Multi-mode Travel in particular 22(a). *"planning for new developments to achieve greater integration of the transport system"*)

Network, Parking and Congestion Management

- 2.35 This section demonstrates how the Scheme complies with LTCP policies on Network Management and Road Schemes, including how it is consistent with subsequently approved Oxfordshire County Council Policy covering a 'decide and provide' approach to transport provision.
- 2.36 The LTCP policy on Network, Parking and Congestion Management (Policy 31 (c)) [CD G.4, page 97] sets out that Oxfordshire County Council will *"balance the needs of all network users, whilst promoting and prioritising walking, cycling and public transport at every opportunity"*.
- 2.37 The LTCP does not aim to eliminate car use and recognises that travel by car will still be required. The explanatory text for LTCP Policy 31 [CD G.4, page 97] states: *"Whilst our priority is on reducing car use and the need to travel, we recognise that in some cases new roads, or widening roads and junctions may be necessary, to ensure a reliable and effective transport network"*.
- 2.38 The Scheme therefore directly supports this LTCP policy through the provision of new highway infrastructure as part of an overall network approach, which would also influence travel choices by supporting public transport, walking and cycling.
- 2.39 LTCP includes a section on Road Schemes and LTCP Policy 36 covers this. Policy 36 (CD G.4 p107) states that Oxfordshire County Council will:
- "a. Only consider road capacity schemes after all other options have been explored.*

b. Where appropriate, adopt a decide and provide approach to manage and develop the county's road network.

c. Assess opportunities for traffic reduction as part of any junction or road route improvement schemes.

d. Require transport assessments accompanying planning applications for new development to follow the County Council's 'Implementing 'Decide & Provide: Requirements for Transport Assessments' document.

e. Promote the use of the 'decide and provide' approach in planning policy development to support site assessment."

2.40 Paragraph (a) clearly demonstrates that the Scheme is not in conflict with the LTCP, as this allows Road Capacity schemes to be considered. There appears to be a misunderstanding by many parties raising representations to the Scheme that the LTCP, and specifically Policy 36, indicates that Oxfordshire County Council will never deliver infrastructure 'for cars', and that any scheme doing so must be following a 'predict and provide' methodology. This is incorrect, as clearly set out in the LTCP Policy 36 and the supporting text for that policy, set out on pages 105/106 of the document and highlighted below:

2.40.1 *"However, there are examples where road schemes may be required and will deliver improvements. This includes where access is needed to new developments or where the existing road is unsafe."*

2.40.2 *"It is important that a 'decide and provide' approach is taken during the development of new schemes to ensure that they contribute towards delivery of our vision and do not reinforce traditional transport planning approaches."*

2.40.3 *"Where appropriate, road capacity schemes will help to tackle congestion and pollution providing benefits to health and everyday journeys. It will also support the economy and ensure the county remains an attractive place to work and live."*

2.40.4 *"Adopting a decide and provide approach to planning new infrastructure, including alongside proposed new development will mean that any road capacity enhancements align with our transport user hierarchy, prioritising the most space efficient modes of walking, cycling and public transport. This will help to create attractive environments for residents to walk and cycle in."*

2.41 Paragraph (a) also sets out a requirement for all other options to be explored. The optioneering work undertaken for the Scheme is set out at significant length in section 8 of Aron Wisdom's evidence, which explains how other options that did not include extra road capacity were thoroughly explored and discounted as schemes in their own right. These included public transport options (covering rapid transit, rail station and service upgrades, Park & Ride development and bus network and service improvements) as well as lower cost options focused on cycle and pedestrian facilities and traffic management. This clearly demonstrates compliance with this area of this Policy.

2.42 Paragraphs (b), (d) and (e) all deal with different aspects of the 'decide and provide' approach, which has now been adopted as Oxfordshire County Council Transport Policy, but which was not in place at the time the Scheme was conceived, developed and assessed. Claudia Currie's proof of evidence also discusses 'decide and provide' with a modelling focus. The points below set out how the Scheme meets the principles of the 'decide and provide' approach:

2.42.1 Reduced demand assumptions were used in future year (2034) transport modelling, as explained in Claudia Currie's proof of evidence;

2.42.2 Future year (2034) housing assumptions are not the full site build out in all cases, if the housing trajectories extend past 2034. For example, the housing site called 'land adjacent to Culham Science Centre' is allocated in the

SODC Local Plan 2035 for approximately 3,500 new homes, but has been modelled at 1,850 dwellings, which is the number that SODC advised would be delivered by 2034. This is further explained in Claudia Currie's evidence;

2.42.3 The Scheme includes very high quality walking and cycling infrastructure, directly linking many of the growth areas to both existing locations and other growth areas. This directly helps to engender modal shift. The walking and cycling infrastructure provision is discussed further in Aron Wisdom's evidence.

2.42.4 The Scheme performs an essential role in enabling future services to operate, as set out by the major bus operator [CD N.7], extracts of which are quoted in paragraphs 2.30.1 and 2.30.2 of my proof of evidence. This directly helps to engender modal shift.

2.43 For clarity, the table below summarises what a 'predict and provide' methodology could have meant if the Scheme had been assessed and designed in this way:

Element of Scheme	How might be dealt with in a 'predict and provide' methodology
Trip rates	Assume a high trip rate, based on what people do today, or perhaps a higher trip rate depending on trend lines
Housing and employment growth	Assume full build out of future planned growth, perhaps even assume extra housing or employment comes forward 'just in case'
Junction and link operation	Ensure that spare capacity is left in the future year modelling so that little or no congestion occurs

2.44 As to paragraph (c) and its requirement to "assess opportunities for traffic reduction", this has clearly been done in the Scheme. The Scheme directly enables traffic reduction by enabling modal shift to walking and cycling by including high quality walking and cycling infrastructure, connecting many existing and new places. The Scheme also enables modal shift to public transport as explained by Luke Marion, Managing Director of Oxford Bus Company and Thames Travel [CD N.7]. Additionally, the Scheme (and its design) assumes traffic demand reductions in the future, as described above in the section discussing 'decide and provide'.

2.45 In conclusion, the LTCP does not prohibit the Council from delivering schemes which include highway capacity, and any assertions to the contrary are incorrect. Any scheme proposals must be considered holistically in their geographic context (including balancing the needs of rural as well as urban communities), historic context (existing infrastructure such as road and rail, village/town layouts), and future context (housing and employment growth assumptions). It is clear that the LTCP not only does not prevent, but actually enables schemes like the Scheme from being progressed and that a 'decide and provide' based approach compliant with Oxfordshire County Council policy in this area has been adopted.

Local Connectivity

2.46 This section sets out how the local policy framework developed under the previous Local Transport Plan (LTP4) [CD G.5] remains current and demonstrates how the Scheme is compliant with these policies and the wider transport strategy and plans for the area.

2.47 LTCP is a development and update of the approach set out in LTP4. The three overarching goals that LTP4 included are set out below [CD G.5, LTP 4 Volume 1: Connecting Oxfordshire: LTP 2015-2031, page 16]:

- Goal 1 - To support jobs and housing growth and economic vitality
- Goal 2 - To reduce emissions, enhance air quality and support the transition to a low carbon economy
- Goal 3 - To protect and enhance the environment and improve quality of life (including public health, safety and individual wellbeing)

2.48 Although LTP4 has been superseded by the LTCP, it was Oxfordshire County Council’s adopted LTP at the time that the Scheme was developed, assessed and approved, and the Area Transport Strategies included in LTP4 remain as Oxfordshire County Council Policy. As stated under the ‘Local Transport Plan 4’ pages on Oxfordshire County Council’s website:

“A set of area and corridor strategies was published in support of LTP4. We are working to redevelop the area and corridor strategies, however, until this work is complete the strategies remain adopted policy.”

2.49 The Scheme formed part of the Area Strategy for Science Vale, as adopted as part of LTP4, as one of the specific schemes required to deliver LTP4. In the current LTCP document [CD G.4], Appendix 1 ‘LTP4 review’ (pp.156-158 of the LTCP) comprises a review of these LTP4 strategies and the progress made on delivering them.

2.50 The three relevant policies from the LTP4 Science Vale Area Transport Strategy that have been taken forward into LTCP are summarised in the table below:

LTP4 Published Text	LTCP 2022 Update
<p>Policy SV 2.6</p> <p>Delivering Science Bridge and widening of A4130 to provide relief to Manor Bridge and support/enable development in the area including Didcot A, NE Didcot, Valley Park and NW Valley Park.</p>	<p>The infrastructure proposed in this policy is being delivered as part of the Housing Infrastructure Fund (HIF) project. The project is estimated to be completed by 2024.</p>
<p>Policy SV 2.13</p> <p>Delivering improved Access to Culham Science Centre (CSC) Phase 1 (new road from CSC entrance to the B4015 north of Clifton Hampden) to improve connectivity between Science Vale and the Eastern Arc of Oxford and direct access to CSC.</p>	<p>The infrastructure proposed in this policy is being delivered as part of the HIF project. The project is estimated to completed by 2024.</p>
<p>Policy SV 2.16</p> <p>Delivering improved Access to Culham Science Centre (CSC) Phase 2 - new river crossing (between Didcot and CSC) to improve connectivity between Science Vale and the Eastern Arc of Oxford and direct access to CSC. This scheme also increases capacity for north/south movements across southern Oxfordshire and reduces pressure on the A34, whilst increasing network resilience across the Thames floodplain.</p>	<p>The infrastructure proposed in this policy is being delivered as part of HIF project. The project is estimated to completed by 2024.</p>

- 2.51 The adopted LTCP includes a section on local connectivity, containing policies relating to Area Transport Strategies (LTCP Policy 52, CD G.4, p152). This Policy sets out a commitment to developing and delivering these Strategies, stating that Oxfordshire County Council *“will develop and deliver area transport strategies that align with the LTCP vision and translate the LTCP policies into schemes for use in bidding, funding and developer negotiations”*.
- 2.52 These Transport Strategies have now been renamed as Area Travel Plans, with the first of these, the Central Oxfordshire Area Travel Plan, completed and approved in September 2023. As part of the development of Part 2 of the LTCP, a programme of Area Travel Plans covering the other main areas of Oxfordshire is being developed. This programme includes a Didcot Area Travel Plan, which when completed is intended to be adopted as part of the overall LTCP suite of documents.
- 2.53 As referenced in paragraph 2.48 above, until the Didcot Area Travel Plan is completed and in place, the current set of area and corridor strategies published in support of LTP4 (including the Science Vale Area Strategy which covers the area that includes the Scheme) remain the relevant adopted transport policy documents for this area. This therefore includes the three policies identified in the table above.
- 2.54 It is the intention for the Didcot Area Travel Plan, and the schemes and measures it contains, to put the transport user hierarchy into practice by focusing on the improvement of walking, cycling, public and shared transport infrastructure, the latter including the Scheme, enabling more of the current network to be prioritised for non-car modes.
- 2.55 Accordingly, paragraphs 2.46 to 2.54 above set out how the Scheme complies with and supports LTCP Policy 52
- 2.56 In setting out Oxfordshire County Council's approach to rural journeys, the LTCP [CD G.4, page 133] recognises that *“eliminating car journeys is not realistic for rural residents where there are not sustainable alternatives at present... policies in the LTCP will be tailored to support rural communities to reduce car use”* and (page 135) *“in rural areas we can encourage the use walking, cycling, public and shared transport modes”*. The Scheme is a demonstration of this approach by its provision for increased connectivity including by Active Travel and Public Transport across the Didcot Area
- 2.57 This demonstrates how the Scheme helps achieve the outcomes of LTCP Policy 54 [CD G.4, page 135], providing for rural journeys *“that reduce through traffic, improve connectivity, accessibility and contribute to delivery of our transport vision.”*
- 2.58 In conclusion, section 2 of my evidence clearly demonstrates that the Scheme is fully compliant with LTCP policy. It also shows that the Scheme directly supports a number of LTCP policies, including those covering Active Travel (Walking and Cycling), Public Transport (in particular the bus network and services), Network Management (in particular provision of road schemes in the context of the Council's 'decide and provide' approach) and local connectivity. The Scheme remains part of the adopted transport strategy approach for this area, alongside other measures and proposals being developed through the Didcot Area Travel Plan project.

3 RESPONSE TO ALLEGATIONS OF SCHEME CONFLICT WITH THE LTCP

- 3.1 A number of Statements of Case, Objections and Representations to the Orders and the Planning Application have been made, making points concerning alleged conflict with the policies and approach set out in the LTCP (CD G.4), including whether the traffic modelling has followed the 'Decide and Provide' approach.
- 3.2 The majority of these are covered in the Statements of Case and Representations made by, amongst others:
- 3.2.1 Planning Oxfordshire's Environment and Transport Sustainability (POETS, Statement of Case CD L.7)
 - 3.2.2 Neighbouring Parish Council Joint Committee (Statement of Case CD L.6 and Representation CD N.21)
 - 3.2.3 Ian Palmer (CD N.14)
 - 3.2.4 The Oxford Road Actions Alliance (Representation CD N.26)
 - 3.2.5 Councillor Charlie Hicks (Representation CD N.30)
- 3.3 These principally cover the following broad areas:
- 3.3.1 Alleged conflict with LTCP policy 36 (decide and provide), specifically parts B, D or E which cover 'decide and provide' and traffic modelling;
 - 3.3.2 Alleged conflict with the position set out in the LTCP, which acknowledges that new roads are not a sustainable long-term solution for Oxfordshire;
 - 3.3.3 Alleged conflict with the LTCP targets to reduce car trips;
 - 3.3.4 Alleged conflict with the aim of the LTCP to constrain traffic movements in order to incentivise the use of active travel modes and public transport.
- 3.4 I respond to the above concerns as follows:
- 3.4.1 The Scheme does not conflict with LTCP Policy 36 – as I have set out in paragraphs 2.40 to 2.42 above;
 - 3.4.2 The Scheme is not in conflict with the Council's position on new roads set out in the LTCP, as I have set out in paragraphs 2.36 and 2.37 above;
 - 3.4.3 The Scheme is not in conflict with LTCP targets to reduce car trips, as it is part of an overall, multi-mode approach to transport provision which I have set out throughout this evidence (in particular paragraphs 2.20 and 2.21; 2.24; 2.26 and 2.27; 2.29 and 2.30; 2.35, 2.51, 2.56 and 2.57)
 - 3.4.4 The Scheme is not in conflict with the aim of the LTCP to constrain traffic movements in order to incentivise the use of active travel modes and public transport, again as principally referenced in the paragraphs I have referred to in 3.4.3 above.
- 3.5 To conclude, my evidence demonstrates that the concerns raised in relation to alleged conflict with the LTCP have been responded to, and demonstrate that, overall, there is no conflict with LTCP.

4 SUMMARY AND CONCLUSION

- 4.1 This proof of evidence has covered the LTCP, which is Oxfordshire County Council's current Local Transport Plan, including outlining its vision, objectives, targets and policies and how the Scheme contributes to these overall.
- 4.2 My proof has shown that the Scheme, as well as complying with the LTCP overall, is also compliant with a significant number of policy areas, individual policies and outcomes, of which I have identified the most relevant and demonstrated how the Scheme meets these.
- 4.3 In doing so, my proof has emphasised that the LTCP is a document which covers transport in the round, requiring an overall net approach, and that it would not be expected (or possible) for every proposal or scheme to contribute to every policy, objective, or outcome.
- 4.4 My proof has demonstrated that the Scheme delivers high-quality road, walking, cycling and public transport infrastructure, which is necessary to support housing and employment growth and which, in turn, is supported by the development plans in the area and national policy.
- 4.5 My proof also shows that the Scheme is fundamental to enabling modal shift to active travel including walking and cycling. It highlights the critical role that the Scheme is expected to play in supporting the ongoing success of the bus network and that the Scheme is needed to support new and enhanced public transport services in the area.
- 4.6 My proof has also demonstrated how the Scheme (including the methodology employed in the transport modelling for the Scheme) is based upon an overall 'decide and provide' approach, complying with the Plan and policies updated since the LTCP was adopted.
- 4.7 It should be noted that the LPA proposed reason for refusal 8 is no longer pursued, which accords with my evidence.
- 4.8 I have concluded by demonstrating that the Scheme is not in conflict with the LTCP policies or position as set out in objections to and call-in representations on the Scheme.

5 STATEMENT OF TRUTH AND DECLARATION

- 5.1 I confirm that, insofar, as the facts stated in my proof evidence are within my own knowledge, I have made clear what they are and I believe them to be true and that the opinion I have expressed represent my true and complete professional opinion.
- 5.2 I confirm that my proof of evidence includes all facts that I regard as being relevant to the opinions that I have expressed and that attention to drawn to any matter which would affect the validity of those opinions.
- 5.3 I confirm that my duty to the Inquiry as an expert witness overrides any duty to those instructing or paying me, and I have understood this duty and complied with it in giving my evidence impartially and objectively, and I will continue to comply with that duty as required.
- 5.4 I confirm that, in preparing this proof of evidence, I have assumed that same duty that would apply to me when giving my expert opinion in a court of law under oath or affirmation. I confirm that this duty overrides any duty to those instructing or pay me, and I have understood this duty and complied with it in giving my evidence impartially and objectively, and I will continue to comply with that duty as required.
- 5.5 I confirm that I have no conflicts of interest of any kind other than those already disclosed in this proof of evidence.

JOHN PATRICK DISLEY

30 JANUARY 2024