

PUBLIC INQUIRY

DIDCOT HIF1 ROAD PROPOSALS

CASE REF: APP/U3100/V/23/3326625.

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On behalf of POETS

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SUMMARY

Section 2 Failings of the Didcot Road Proposals

1. These are major road proposals which are not components of an integrated transport strategy incorporating effective mode shift measures. Which would be necessary to meet the County's target of a 25% reduction in car trips by 2030 and a further 33% reduction by 2040 and make Public transport and active travel the natural choice as envisaged by a former Transport Secretary in "Decarbonising Transport".
2. Consequently the proposals conflict with national and local car travel reduction policies.
3. Claim of being a balance strategy is unsubstantiated. Experience from Oxford and elsewhere shows that achieving a mode shift requires "sticks" as well as "carrots". Such measures are missing from the proposals and the associated Didcot Garden Town and Walking/Cycling Plan.

Section 3. Effects to the East

1. The traffic information shows that there would be considerable increases at the Golden Balls roundabout, along B4015 to the east and through the conservation village of Nuneham Courtenay to the north. However, although the traffic model network included that junction, it was not included in the junction assessments provided for the inquiry. The claim that it will be considered in a future planned study is not acceptable and the consequential effects and changes that would be needed at the junction should be included in the HIF study assessments.
2. The creation of a high standard route via the HIF 1 roads across Didcot from the regularly congested A34 to A4074 will create the possibility of traffic diverting from A34 and avoid overloading on that road and the Oxford Ring Road to access the Cowley area of Oxford via A4074. Similarly, there will be attractions for traffic to reroute through Didcot and routes east of Golden Balls to access M40 north. These possibilities should have been assessed.

Section 4. Establishment of a Policy Compliant New Transport Plan

1. The Council's Cabinet have commissioned a new plan and work is in progress. There is no shortage of local guidance and examples elsewhere of what a properly integrated transport and development plan which would meet the environmental and mode shift objectives of national and local policies should contain..

2. Rejection of the road proposals need not restrain development as the elements of a new Plan would be likely to be less controversial and possible to implement earlier than the completion of these roads.

1.0 INTRODUCTION

1.1 Personal Details. I am Roger Williams former Chief Transport Planner for Oxfordshire County Council. In that role I was responsible for transport planning strategy and implementation as well as for development control, road safety and public transport.

I took early retirement in 1999 to establish a consultancy which advised on transport issues in the UK and abroad. I also contributed to national and international conferences and published papers on traffic restraint including Park and Ride in Oxford. I am a member of POETS (Planning Oxfordshire's Environment and Transport Sustainably) an association of mainly retired planning professionals and academics with interests in the planning of the County.

1.2 My Interests I have no direct or local personal interests in these proposals. I am objecting to them on behalf of POETS who are concerned about the environmental and cost consequences.

1.3 Scope of Evidence Although very much in agreement with others who are objecting on the basis that these road proposals are totally contrary to the transport and environmental policies of both Oxfordshire County Council (OCC) itself and the government, I am not proposing to duplicate their evidence other than to highlight particular failings of the proposals, but rather to focus on three transport matters :

- Relationship to development and sustainable travel
- Impacts East of the Study Area
- Development Implications

2.0. FAILINGS OF THE HIF 1 DIDCOT ROAD PROPOSALS

2.1 General What is being proposed is an outdated 20th Century road building solution rather than a 21st Century integrated transport solution. This is highlighted in the POETS Statement of Case, the evidence of Richard Tamplin, Professor Goodwin, the Parish Council's Joint Committee and others.

The failings include:

- It's a highway plan not a component of an integrated multi modal transport and development plan.
- Conflicting with national and local climate change and carbon reduction policies.
- Conflicting with the car travel reduction objectives of OCC's Local Transport Plan 2015 – 2031 (LTP4). and the targets of the Local Transport and Connectivity Plan 2022- 2050 (LTCP) and national carbon emissions reduction targets.

- Lack of consideration of induced traffic
- Lack of consideration of significant impacts outside the study area, particularly on Abingdon and to the east of Didcot.
- Lack of consideration of sustainable alternatives.

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2.2 A Highway Plan Not a Component of an Integrated Transport Plan

2.2.1. Lack of a Integrated Travel Context

In their Statement of Case the County emphasise that the purpose of the road proposals is to improve access to housing and employment growth (1.5). They explain how the roads would reduce congestion and improve access but they leave to others responsibility for designing associated development and transport including NMU (Non- Motorised User) schemes. Hence, the County Council can't show how these roads are part of a coherent integrated development strategy. They list all the background policy documents providing the context for the roads (Statement of Reasons Chap 9) but only identify two documents which define a spatial pattern of transport facilities. These are the Didcot Garden Town Plan and the Didcot Local Cycling and Walking Infrastructure Plan. It's very unlikely that these plans arose from a clean sheet approach to the design of a sustainable travel system for the area. But instead had to assume that the HIF1 roads were a given. As a consequence the road proposals are just that and not a component of a transport plan integrated with the development proposals. The form and arrangement of the roads is more akin to the principles of the superseded advice of Design Bulletin 32 (NPPF 114 c) rather than the current government advice in Manual for Streets¹.

2.2.2 Walking, Cycling and Public Transport not Prioritised

The NPPF Chapters 8 and 9 emphasise the importance of encouraging active travel and public transport and ensuring that *"opportunities to promote walking, cycling and public transport use are identified and pursued"* (108b). In Didcot's case these considerations appear to have been an after thought. Certainly, had they been considered at the outset, in conjunction with local planners, the anomaly of having a proposal in the Didcot Garden Town Delivery Plan which competes with cycle/walking proposals of HIF could have been avoided. This is a proposal for a major new, largely segregated cycle route : "The Garden Line", connecting Harwell, Didcot Centre and Culham (DGT DP 5.1.6). This is located parallel to the Didcot to Culham River Crossing road and would be far more attractive to cyclists and pedestrians than the cycle/walking proposals of the HIF scheme.

2.3 Conflicts with National and Local Car Trip Reduction Policies.

The County Council's LTCP includes the target of a 25% reduction in car trips by 2030 and an additional 33% reduction by 2040 . Grant Shapps, the former Secretary of State for Transport in his forward to "Decarbonising Transport"² includes the *objective of making "Public Transport and active travel the natural choice for daily activities"*.

2.3.1 A Balanced Transport Strategy ?

¹ Manual for Streets Department for Transport 2007

² Decarbonising Transport Setting the Challenge Department of Transport 2020

This Didcot road scheme is almost completely motor vehicle centric proposals. Whilst the applicant claims in the Statement of Case (para 1.5) that these roads “*form part of a balanced transport strategy*” there is no evidence of balance:

- No targets or predictions for travel shares by different modes are stated.
- Despite claims that a “Decide and Provide” forecasting approach has been “taken into account” (Origin Technical Note Dec 2023) there is no evidence in the Council’s Statement of Case or supporting technical documents of anything other than a traditional “Predict and Provide” approach having been used.
- The traffic forecasting methodology adopted only considers one mode of travel: motor vehicles.

There is just one case where vehicle trip generation forecasts for new developments have been adjusted to reflect the applicants’ suggestion that the proposed provisions for walking, cycling and buses will attract users away from cars, justifies the application of a 20% trip generation reduction from new development.(Environment Statement Vol 1 16.4.27). I believe that these provisions are very unlikely to be effective for reasons explained below. Hence the 20% reduction would be unlikely to be achieved. In any case, this is just a one-off, not a component of a comprehensive balanced transport strategy.

2.3.2 Inadequacies of the HIF 1 Motor Vehicle Trip Reduction Measures

“*The high quality and comprehensive active travel network*” that the County claim is part of these proposals (SoC 5.15.6) consist merely of cycle and walking paths added alongside the new roads, mostly located adjacent to the carriageways. Plus some pedestrian/cycle crossing points at junctions.

The core requirements for cycle routes are specified in Government advice³ as being:

- Coherent
- Direct
- Safe
- Comfortable; an
- Attractive

Whilst the proposed roadside cycle and pedestrian facilities are generally to good width standards, such routes can hardly be claimed to be Comfortable and Attractive because :

- they will be adjacent to fast motor traffic, with the attendant safety risks, real and perceived, plus air pollution.
- walkers and cyclists’ journeys will interrupted by the many crossing points at the eight roundabouts and at the side road junctions and generally have to wait until motor vehicles give way.

As for being Coherent and Direct; since the new roads are free of frontage access and located on the peripheries of planned development areas, rather than linking to major travel attractors, they are unlikely to provide direct routes for many cyclist or pedestrian trips. The major roads themselves will also create extensive barriers to direct and convenient walking and cycling movements. Consequently, it cannot be said that the road scheme will deliver “*a high-quality and comprehensive active travel network*”

³ Local Transport Note 1/20 Cycle Infrastructure Design Department For Transport July 2020

enabling direct and safe connections to existing and proposed education employment , housing, amenity and recreational areas and reducing the impact of the private vehicle” (SoC 5.15.6).

2.3.3 Inadequacies of the Bus Measures (see Richard Tamplin’s Evidence)

2.3.4. Need for “Sticks” as well as “Carrots”

The effectiveness of the associated DGTP and the Didcot Local Cycling and Walking Infrastructure Plan (DLCWIP) to achieve the mode shift aspirations of the County Council cannot be relied upon because, although they include many supportive and attractive walking and cycling proposals plus some public transport improvements, they don’t include effective motor vehicle restraint measures. It is widely recognised that effective mode shift requires the application of both “carrot and stick” measures. Local Transport Note 1/20 states (4.2.8) *“To make cycling an attractive alternative to driving short distances, cycle routes should be at least as direct-and preferably more direct -than those available for private motor vehicles”* and the National Design Guide⁴ states (82) *Prioritising pedestrians and cyclists mean creating routes that are safe, direct, convenient and accessible for people of all abilities”*. The Transport Research Institute at Napier University publish research results on the subject of encouraging cycling for example: Planning for cycling in a dispersed city.⁵ *“Cycling is unlikely to become a mainstream mode of transport without adequate networks of cycle lanes and paths, intersection treatments and bicycle parking. In addition, reducing the attraction of alternatives is also important”*.

2.3.5. The Oxford Example

Oxford led the way with its Balanced Transport Policy in the 1970s and the introduction of the Park & Ride system, coupled with motor vehicle restraint and bus priority. The success of Oxford’s Park and Ride (P&R) system demonstrates the importance of having a combination of components to influence drivers to abandon their cars and use public transport.

Key components are: convenience, costs saving, time saving and reliability.

- Costs: It’s cheaper to use P&R than park in an expensive City Centre car park.
- Convenience and reliability: there are P&R parks on each City radial approach and unlike City Centre spaces which are not always available and can be expensive, finding a parking space can be relied upon. Buses are frequent and available throughout the day and week.
- Travel time: priority bus lanes and available car parking spaces mean that bus travel is normally more reliable and usually faster than private vehicle use.

In sum; persuading drivers to move from the comfort and convenience of their motor vehicles and instead use public transport, cycles or walking,

⁴ National Design Guide Ministry of Housing, Communities and Local Government 2021

⁵ Transport Research Institute Edinburgh Napier University Essential Evidence 4 Scotland No 34 Planning for cycling in the dispersed City

relies on them perceiving a significant advantage in doing so.

The HIF1 proposals contain very limited “carrots” to encourage a move to cycling walking or public transport and no significant “sticks”. The associated plans of the DGTP and the DLCWIP contain better “carrots” but no significant “sticks”. Consequently, the County Council’s LCTP mode shift targets would be very unlikely to be achieved.

3.0 IMPACTS TO THE EAST

3.1 Area of Concern The County Council’s Technical Note para 2.1.4 identifies the area of POETS’ concern as being “the B4015 to the Golden Balls Roundabout on the A4074” . In fact the concerns take in a wider area from the Golden Balls Roundabout including north along A4074 especially the effects on Nuneham Courtenay and east, along B4015 and A329.

3.2 Restricted Study Area The AECOM Technical Note of December 2023 illustrates Fig 4 the road network and area for detailed traffic assessment via the Paramics Microsimulation Model and Fig 5 shows the junctions that have been assessed. Whilst the Paramics network includes routes of interest in the east, including the A4074 Oxford Reading Road and its junction with B4105 (Golden Balls Junction) so it seems that information on the “before and after” effects of the Didcot proposals at the Golden Balls Junction and roads it serves could have been provided and included in the junction assessment tables of the AECOM Transport Assessment Sept 2021 and the recent Technical. Note. One has to ask why is that information not included ?

3.3 OCC Rebuttal. It is said in the Technical Note (2.27) that “*the Scheme would not change a driver’s route choice to travel through the Golden Balls junction, so it is not required to be scoped into assessments*”. However, this is clearly not the case as the table below illustrates and as can be expected following from the introduction of the Clifton Hampden Bypass there would be a transfer of traffic from the A415 through the village to the bypass and the B4015. Hence a transfer of traffic at the Golden Balls junction from the south to the south west would itself require consideration to check that access onto the roundabout is viable from each arm and what the effects would be on the other arms . There would be other traffic effects at the Golden Balls junction arising from the Didcot the proposals which should have been assessed including:

- a. the substantial growth of traffic flowing to and from the junction due to the development, see the table below.
- b. Extra traffic arising from Induced traffic and the questionable assumption that the generation of traffic from new development can be factored by 80% (para 16.5 Environmental Statement Vol 1 Chap 16 Transport) without the incorporation of any comprehensive mode shift measures. (review)
- c. the changes in the convenience of travel through the Didcot area plus problems on surrounding routes which will result in strategic route choice changes leading to other “new” traffic passing through the Golden Balls Junction.

Just considering the substantial increase predicted in traffic arising from the Didcot proposals on the B4105 approach to the Golden Balls Junction would in itself justify its inclusion in the detailed junction considerations and costings of the HIF 1 scheme. The table below shows the scheme resulting in an almost 200% increase in traffic on the B4015 approach to 27,640 vehicles per day.

AECOM Forecast Daily Traffic on Eastern Approaches to A4074 from Didcot
(Tables 16.12 and 16.14 Environment Statement Transport)

	2024	2034 (Do Nothing)	2034 (With Development)	Change '24 – '34 (With Development)
B4105 (Link 41)	9,337	12,812	27,640	18,303 (+ 196%)
A415 (Link 39)	7,349	11,249	481	-6,868 (-93%)

3.4 Golden Balls Junction Study Given this considerable traffic increase and changes due to the Didcot proposals alone, it's not surprising that, as the Technical Note reveals (p12) a study of options for changes to the Golden Balls is to be undertaken by the County Council. (It's notable that the brief for that study includes walking and cycling, bus priority, a mobility hub and a future bus strategy in the measures to be considered). But that shouldn't excuse OCC from not including the costs and implications at this junction in the HIF1 considerations.

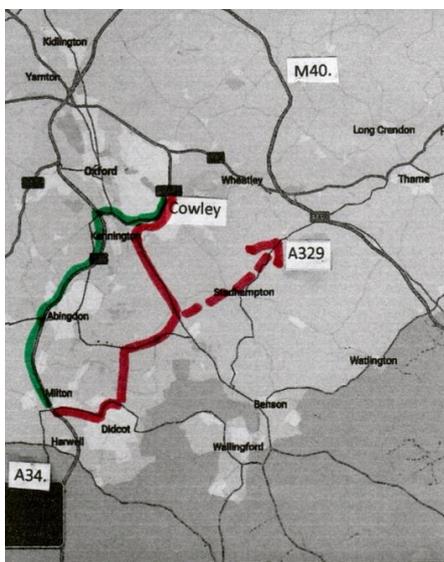
3.5 Rerouted Traffic As mentioned above other "new" traffic will be attracted to the Golden Balls area. This will arise from "strategic" rerouting of traffic. In particular, north-south traffic between A34 south and East Oxford / M40 (N) attracted to use new commodious roads through Didcot rather than often congested roads particularly A34 and the Oxford Ring Road. Problems on which will increase with traffic growth and Transfers of traffic following the implementation of proposals to restrict traffic movements within the City. Astonishingly, this doesn't seem to have been properly considered in any of OCC's modelling work.

3.5.1 A34 Didcot – Oxford Rerouted Traffic

These alternatives are shown on the diagram below. The distances from the A34/A4130 Junction to the Oxford Ring road at Cowley via A34 (Green) and via A4074 (Red) are comparable. The attraction to use the Red route would be heavily influenced by conditions, actual and reputational, on the Green route. Para 2.7 of the Technical Note includes diagrams showing traffic conditions on the wider road network. This indicates A34 and parts of the Oxford ring road being overloaded during morning and evening peaks. This is not surprising as both routes frequently feature in radio traffic reports of delays on Oxfordshire roads. Such overloading is likely to be even more frequent with general traffic growth, plus planned developments north and south of the ring road, including a new football stadium in the "Kidlington Gap". Additional pressures and problems on A34 and the Oxford Ring road will arise the transfer of traffic due to the introduction of "Traffic Filters"; restrictions on

key cross City routes, including Marston Ferry Road, aimed at reducing cross town traffic within the ring road. In those circumstances of increasing traffic around Oxford, drivers influenced both by the experience and reputation of congestion on A34 and the Ring Road would be attracted to divert via the new Didcot Roads

3.5.2 A34 – M40 Rerouted Traffic. Traffic from A34 south to M40 north will also be attracted to divert from the A34/Oxford Ring Road to use the Didcot new roads and the country lanes south of Oxford B4015 and A329 illustrated by the red dotted line and arrow in the diagram below. The distances from the A34 / A4130 Didcot Junction to M40 Junction 9 Bicester are comparable via A34 (Didcot/Oxford) to the “new” route through Didcot to Golden Balls then via B4015/A329 to M40 Junction 8, especially with the planned Chiselhampton/Stadhampton Bypass in place.



New route attractions following from the Didcot road proposals.

3.6 Nuneham Courtenay. It's not surprising that as stated in the Statement of Case of the Parish Councils p 20 that Nuneham Courtenay “*has serious apprehension about the increase in traffic and the resulting noise pollution and vibrations*”. Nuneham Courtenay is a special historic conservation village with lines of Georgian cottages facing each other across the A4074 just north of Golden Balls. The substantial increase in traffic predicted for the Golden Balls junction will be accompanied by similar substantial increases in Nuneham Courtenay which should have been assessed in relation to the Didcot scheme. To suggest that this will all be considered later via another study is not acceptable as it avoids proper consideration and evaluation of the Didcot proposals.

4.0 ESTABLISHMENT OF A POLICY COMPLIANT NEW TRANSPORT PLAN FOR D IDCOT

4.1 New Plan Commissioned

A new Didcot comprehensive plan was commissioned by the County Council's Cabinet in March 2022 when they resolved to :

"Authorise the development of a new Didcot area transport strategy and masterplan to meet the corporate priorities and agree to provide appropriate resources to support the development of the plan".

I have been advised that production of such a plan, to be aligned with LTCP principles and known as the Didcot Area Travel Plan (DATP) is *"in progress"*. (FOI response Ref 22456 Nov '23). and will supersede the Vale Transport Strategy of LTP4.

4.2 Guidance on the Components and Format of a New Plan

4.2.1 Oxfordshire Policy Advice

There seems to be no shortage of local advice and policies on what sustainable, pro public transport and pro cycling/walking strategies should include. For example, LTP4 includes : Vol 4 Active and Healthy Travel Strategy, Vol 7 Science Vale Transport Strategy, (which includes, for example, suggestions on how the extensive Didcot area rail network could assist and lists 10 Cycle Premium Routes and a similar number of Connector Routes for the Science Vale (LTP 4 Vol 4 3.23) There is also Vol 8 Science Vale Cycling Strategy. The LTCP contains many policies in support of the County Council's vision; the delivery of a *"net zero Oxfordshire transport and travel system"*. Other helpful suggestions to assist in mode shift objectives are included in The Didcot Garden Town Delivery Plan and contained in the Didcot Local Cycling and Walking Infrastructure Plan which has recently been completed.

Oxford itself provides a convenient example of effective mode shift policy with its car travel restraint and Park and Ride system. It also provides a warning: the difficulty of trying to retrofit slow mode and public transport priority measures into a fully developed urban area.

4.1.2 Examples from Elsewhere

Other objectors have drawn attention to examples of comprehensive balanced transport developments, with real potential to meet the mode shift aspirations of OCC, elsewhere. In the Country. These include various developments at Cambridge (evidence of Roger Turnbull) and the whole range of suggestions set out Richard Tamplin's evidence.

It seems, therefore that a realistic and effective slow modes and public transport focussed plan, guided by local plans and policies to replace the outdated road building "solution" for Didcot could be in place soon.

4.3 Consequences for Planned Housing and Employment,

Rejection of these road proposals would not necessarily constrain or delay the provision of new homes and employment in the Didcot area. Indeed, the adoption of the new DATP could mean earlier release of development sites than would be possible if they had to await the completion of the HIF1 roads. This is because the components of such a plan would be likely to much less controversial (and expensive) and they could be delivered alongside and also incorporated in, the planned new housing and commercial developments.

5.0 CONCLUSIONS

5.1 Unbalanced Transport Strategy (Inspector's Issue 3) The claim that the HIF 1 roads form part of a balanced transport strategy cannot be justified, indeed "balance" cannot be assessed as no evidence of mode shares is provided. In fact the only measures proposed as part of the scheme to assist other modes of travel are some roadside cycle/footways plus some new bus stops. Totally inadequate for achieving the mode shift need to meet the aims of National and Local environmental objectives.

It is suggested that such travel restraint measures will be introduced in the future ! But, the ability to do so and their effectiveness would be undermined by the massive increase in road capacity of the new roads. And, surely it doesn't make sense to build new roads at great expense and environmental damage only to reduce the need for such roads later !

5.2 Impacts East of Didcot. (Inspector's Issues 2 and 11) It is quite clear that the routes to the east of Didcot up to A423 and the Oxford Ring Road as well as the route across to M40 via B4015 and A329 would experience substantial increases in traffic from the Didcot proposals. These should have been considered and evaluated. Presumably on the basis that a separate studies of the Golden Balls junction and A4074 are planned, the County chose not to include that junction in the Didcot HIF1 assessments despite having the capability of doing so. That was wrong; those effects and the potentially huge consequential costs, land acquisition and environmental degradation arising,(including at the conservation village of Nuneham Courtaney) should have been included and taken into account in the study costings and environmental assessments of the HIF1 proposals.

5.3 A Policy Compliant New Transport Plan for Didcot

Development of a new plan is underway. There is great potential at Didcot to create a attractive, environment and a effective transport system meeting the environmental imperatives There is no shortage of local proposals and advice from local studies which post date the HIF 1 scheme as well as evidence from examples elsewhere in the country and abroad which are addressing the need for new comprehensive integrated transport and development plans which can meet the need to decarbonise transport as well as creating attractive living environments as envisaged by the National Design Guide.