Didcot HIF 1 Scheme:

Planning Application R3.0138/21

Comments by Planning Oxfordshire's Environment and Transport Sustainably (POETS)

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POETS (Planning Oxfordshire's Environment and Transport Sustainably) is a group of senior planning, environment and transport professionals and academics focussed primarily on planning and transport in Oxfordshire.

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Summary of Key Points

1. The package of measures which are the subject of this planning application are designed to dramatically increase the traffic capacity of this part of Oxfordshire's transport network. This represents an outmoded and inappropriate approach.
2. Implementation of these schemes as proposed would be a major strategic mistake for the following reasons:
    a) Attempting to provide unlimited capacity for motorised traffic has repeatedly been shown to be self-defeating as it encourages new and longer trips, with congestion quickly returning, but with a reduced number and proportion of trips undertaken by public transport and active modes. This would be in fundamental conflict with both national and local policy.
    b) We are in the middle of a climate emergency and there is a need to reduce carbon emissions – from both construction and vehicle use – as a matter of urgency.
    c) The Department for Transport has now accepted new values for carbon that should be applied to the appraisal of new transport schemes and this will destroy the business case of most new road schemes and reduce the likelihood of receiving funding from government in the future.
    d) The Covid-19 pandemic has had a long-term impact on travel and in particular reduced the argument for providing additional capacity to accommodate peak-time pressures.
    e) The county council's Local Transport & Connectivity Plan (LTCP) sets targets for substantially reducing current car trips which necessitate urgent action and are incompatible with adding large increases in capacity to the highway network.
    f) Providing for additional traffic on these road links would result in substantial increases in traffic on the adjoining network, notably the A415/B4015/A329 corridor, worsening congestion and environmental conditions across a swathe of southern Oxfordshire.
    g) Other piecemeal and consequential proposals for highway interventions across this corridor are under active consideration by the county council – leading to suspicions of development of an "Expressway by stealth" - and the proposals in this planning application should not be progressed in isolation from a full understanding of what that complete package of measures might look like and how they might be funded.
    h) Implementing highway "improvements" of this kind requires substantial sums of money and land acquisition with inevitable adverse environmental consequences. Meanwhile, funding for serious improvements to public transport and active travel networks is lamentably small, and in many cases has suffered cuts.
    i) There is currently a large shortfall in funding available for transport related measures across the county, both capital and revenue, and it is inconceivable that full funding will be available, leaving some parts of the county exposed to the adverse impacts of the increased traffic that will result.
    j) High capacity, free-flowing roads are largely incompatible with the needs of pedestrians and cyclists, and in conflict with the policy priorities set out in the council's LTCP.

3. The Didcot HIF schemes were originally designed to accommodate unrestrained traffic movement. The county council is adopting a very different approach in Oxford. Confusingly and inconsistently, the county council is now apparently considering traffic restraint options in its assessment of the adjoining network in the vicinity of the Golden Balls roundabout, while being ready to feed unconstrained traffic volumes towards it from the Didcot direction.
4. **This application should be refused**. In addition to the transport policy failings, while the Environmental Statement has been revised to address earlier omissions and failings, it remains deficient. In particular its failure to assess the impact on Abingdon and on the A415 between Abingdon and the new roads – as the regulations require - is so fundamental that the county council will lay itself open to legal challenge unless it refuses the application.
5. There is already severe pressure on the budget available for this package of measures with a significant risk of costs rising further. The likely consequences are that:
    a) some elements of the scheme would have to be dropped – possibly leading to the worst of all worlds;
    b) funds available to implement measures elsewhere in the county in pursuant of the council's priorities of improving public transport, cycling and walking, will be further reduced;
    c) there will be no funds available to tackle issues on the adjacent road network which will see increases in traffic;
    d) maintenance budgets will experience a further squeeze.
6. Rather than simply refusing the application and undertaking more work to try and rectify its failings, **it would be preferable for the county council to withdraw this application** and cease any further work on these proposed schemes. It should instead undertake a fundamental review of how best to plan for future movement across south and east Oxfordshire, consistent with the council's objectives of giving priority to public transport and active modes of travel while reducing car use, while taking into account anticipated new development and develop revised proposals for public consideration and implementation.
7. Such a fresh approach would eliminate the high financial risk to the council that the current proposals represent, and very importantly, ensure that the credibility of the council's LTCP is not fatally undermined which could have significant repercussions in future years.

Background

8. In April 2020, POETS responded to the consultation on this package of measures – see https://www.poetsplanningoxon.uk/poets-didcot-and-surrounding-area-consultation-response-300420.pdf - and pointed out that the primary focus of attempting to accommodate substantial increases in additional traffic was a strategic mistake from a number of perspectives and advocated that the county council pauses and reviews its approach.
9. In response to the previous planning application, POETS submitted responses in January and February 2022 – see https://www.poetsplanningoxon.uk/poets-didcot-garden-town-HIF1-scheme-planning-application-response-190122.pdf and https://www.poetsplanningoxon.uk/poets-didcot-garden-town-HIF1-scheme-environmental-statement-critique-Feb22.pdf. The former argued that the council should

develop a different package of measures that would be more consistent with its ambitions for reducing traffic while increasing the use of public transport, walking and cycling. The latter submission pointed to the multiple omissions and failings in the Environmental Statement which accompanied the application and concluded that the application should not be granted consent.

10. In the intervening period, the case for pausing and developing a different approach to accommodating movement on the local highway network has continued to strengthen in a number of respects and these arguments are listed below:

    a) Attempting to solve traffic problems by building additional capacity for motor vehicles has repeatedly been shown to be self-defeating. Improving conditions for private vehicles encourages more and longer trips and a switch away from public transport and active modes. Additional trips are also made on the adjacent network leading to worsening traffic conditions over a wider area. After a period, similar levels of congestion will return to the road network and the economic justification for the investment largely undermined. Conversely, providing improved facilities for public transport and cycling will result in a new equilibrium but with a higher proportion of trips made by public transport and active modes. There is of course a need for some new highway construction in the immediate vicinity of large development, but not for an indiscriminate increase in capacity over a wide area.

    b) We are experiencing a climate emergency which necessitates reducing carbon emissions as a matter of urgency. Measures which result in increases in emissions clearly run totally contrary to this priority. The transition to electric vehicles will reduce direct emissions from vehicles. However, over the lifetime of a vehicle, the overall carbon impact of an electric car may still be as much as 80% of a petrol- or diesel-engined vehicle when its manufacture is taken into account. There is therefore an urgent need to reduce both vehicle numbers and use.

    c) New road schemes have often been justified on the basis of having a positive cost-benefit ratio. Until now appraisal of new transport schemes has largely treated carbon impacts – both during construction and from vehicle emissions - as insignificant. The Department for Transport has now accepted revised values for carbon impacts to be applied to future appraisals and this will totally destroy the cost-benefit business case – and therefore the justification for future funding - of most new highway schemes.

    d) The impact of the Covid-19 pandemic will have a long-term impact on traffic movements, which in its new National Road Traffic Projections 2022, the Department for Transport has estimated to be a 5% reduction. In particular peak-hour trips will continue to be much lower than in the past. The case for increasing highway capacity to relieve peak-hour congestion, on which much of the justification for these proposed measures has been based, has therefore been largely undermined.

    e) The council's Local Transport & Connectivity Plan (LTCP5) includes ambitious targets to ***"Replace or remove 1 out of every 4 current car trips in Oxfordshire by 2030"*** and ***"Replace or remove 1 out of every 3 current car trips in Oxfordshire by 2040"***. Providing a huge expansion of highway capacity and accommodating large volumes of additional trips along this corridor will make an extremely difficult challenge many times harder. While some restraint measures are being proposed for Oxford city, new road capacity is still being provided unconstrained across much of the rest of the county. Even in Oxford, many of the land use allocations (e.g. for large increases in commercial development) undermine attempts to reduce car use.

f) Accommodating large volumes of traffic on the roads which are the subject of this application will also result in large increases in traffic on other roads across a wide swathe of southern Oxfordshire. This will result in widespread congestion and environmental degradation over a wide area. Approval and construction of these schemes therefore has implications - in terms of traffic, the environment and finance - way beyond the immediate boundary of these schemes. This is especially significant along the B4015/A329 corridor from the Golden Balls roundabout to the A40/M40, and all the towns and villages within this arc.

g) There have been numerous indications that Oxfordshire County Council is anticipating dramatically altering the road network from Didcot across to the A40/M40 but what the full intentions are has to date been unclear, leading to concerns that a new “Expressway by stealth” may be under preparation. This is currently leaking into the public domain in a drip-feed, piecemeal fashion which is damaging to public confidence but is also an irresponsible way to plan the future transport network. The measures that are the subject of this planning application should therefore not be considered in isolation from the wider measures that would be needed to manage the impact on the rest of the network.

h) Attempting to increase capacity across the wider network, will involve very substantial sums of money and require substantial land acquisition to deal with consequences of additional traffic.

i) The most recent OXIS report highlighted once again the shortfall in funding available to the county council, both capital and revenue, to fund infrastructure across the county. It is inconceivable that the additional funding needed to tackle the pressures on the adjoining network that would result from implementation of the Didcot area schemes and arising from other new development will be available. As a consequence, the wider network across the whole of Oxfordshire is likely to come under even greater stress and environmental degradation; this will mean that already poor and dangerous conditions on the network for cyclists, pedestrians and equestrians will deteriorate further. Funding whether from the Housing Infrastructure Fund, developers and /or Homes England cannot be expected to meet these needs, particularly if government modifies its appraisal processes to reduce funding for carbon intensive schemes. There is currently much uncertainty about future transport funding streams from central government, including speculation that Local Enterprise Partnerships might be stripped of their funding roles. The county council needs to urgently review its approach in the light of these funding pressures and ensure that it matches its proposals for the Didcot area to the policies enshrined in its LTCP.

j) High capacity, free-flowing road links are generally incompatible with encouraging walking and cycling, in part due to increased segregation and the difficulty and inconvenience of safely negotiating junctions that are designed to prioritise motorised traffic.

Environmental Statement

11. The purpose of an Environmental Impact Assessment (EIA) is to assess the effects of development likely to have significant effect on the environment by virtue of factors such as its nature, size or location. The Local Planning Authority must not grant planning permission unless an EIA has been carried out in respect of that development.

12. The county council has agreed that this application must be accompanied by an Environmental Statement (ES) for the purposes of the regulations. The ES previously submitted was not acceptable to the county council as the local planning authority because it was necessary for the statement to be supplemented with additional

information which was directly relevant to reaching a reasoned conclusion on the likely significant effects of the development described in the application in order to be an environmental statement. The revised ES addresses some, but not all, of its failings. As a consequence it is still incomplete and planning consent should therefore be refused.

Abingdon and the A415 west of Clifton Hampden

13. The ES fails to assess the effects of the proposal on the A415 from the proposed roundabout by the Europa School west towards and including Abingdon. Abingdon is a major settlement of more than 35,000 people with substantially committed areas of new housing to the north and north-west and an expanding industrial/commercial area to the west and south-east. These new developments will add substantially to traffic loads along the A415 and the new road east of the Europa roundabout. At peak times the road is heavily overloaded between Culham Science Centre and Abingdon with traffic queues up to a mile or more at Abingdon Bridge, the only route into/from the town from the south and south-east. This traffic enters the historic and commercial core of Abingdon onto a gyratory system with multiple traffic lights and pedestrian crossings which itself is blocked by traffic at peak times. This results in idling vehicles standing for minutes, minor accidents to people and vehicles and severance of the historic and commercial town centre which contains many historic buildings and remains. Abingdon also has a long standing air quality problem.
14. None of the effects of the proposed road on this major settlement, which is within 1 km of the Study Area and which is of a size similar to Didcot, have been assessed, nor have traffic and other significant effects on Abingdon and its committed and rapidly developing housing, commercial and industrial development areas on the proposed road been assessed. There is no alternative for traffic going over Abingdon Bridge than the A415 south-eastwards to the Europa roundabout and the proposed road. The new housing and commercial/industrial around the town is permitted and is proceeding at pace so that there can be no dispute that it will generate substantial volumes of traffic. Some of that traffic will go over Abingdon Bridge in both directions given employment at Didcot itself and at Culham Science Centre, but there is no mention, reference or assessment of the quantity and effects of this committed traffic in the amended ES. The only reference in the traffic assessment Chapter of the ES as submitted is to the housing development north and north-west of Abingdon, but none of the environmental effects of this extra traffic, which will be substantial, are assessed in any other part of the ES.

Other failings of the Environmental Statement

15. The following additional deficiencies are still evident:
    a) Too often the document claims that there would be “No significant adverse effects” which simply does not follow from the analyses which precede it.
    b) The ES frequently refers to securing mitigation measures, without demonstrating what these might be or how effective they might be, while also relying on ill-defined conditions.

c) Alternative packages of measures – such as a high public transport mode-share option, which would be in accordance with the council's LTCP priorities – have not been assessed properly to the degree required by the legislation.

16. As a consequence of all the above failings, the Environmental Statement needs to be withdrawn and resubmitted and the planning application cannot be determined until this has been undertaken. To do otherwise would leave the county council open to legal challenge.

Conclusions

17. **This application should be refused** for the following principal reasons:

a) Although considerable effort has been invested in developing these proposals over many years, the whole philosophy behind the proposals is now totally at odds with the county council's policies and objectives and the thrust of national policies and appraisal. Their implementation as proposed would also hugely increase pressure elsewhere on the local road network with no realistic prospect of funding being available to support additional infrastructure measures to alleviate them, (even were they considered to be environmentally acceptable), and

b) the Planning Regulations require a Comprehensive Environmental Impact Assessment to have been undertaken. In its previous response, POETS drew attention to many omissions and failings in the earlier ES. While some but not all have been addressed, the failure to include Abingdon and the length of the A415 between Abingdon and the proposed new roads in the latest assessment is so fundamental that it renders the application incomplete and as a consequence must be refused until a new ES has been submitted. To do otherwise would leave the county council open to legal challenge.

18. POETS therefore advocate that the county council pauses progress on these schemes while it undertakes a fundamental review of the transport network in southern Oxfordshire that:

a) reflects its new LTCP and the measures needed to dramatically increase walking, cycling and public transport use

b) reflects changing national policies on the need to reduce car use and decarbonise transport

c) reassesses new patterns of movement post-Covid

d) takes into account growing use of the internet that reduces the need for physical movement

e) incorporates agreed development plan decisions

f) reflects affordability, both revenue and capital

g) addresses the climate emergency and the likelihood that central government will in future prioritise funding for measures that support carbon reduction.

19. Such a review is likely to conclude that a package of measures focussed on substantial investment in high quality provision for cycling and public transport would be likely to cost less, be less damaging to the environment and be much more in line with the council's and national policies.