Didcot Garden Town 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 draft Local Transport & Connectivity Plan 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.
   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.

3. The Didcot HIF schemes are apparently 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. The county council should pause progress on these schemes and address this confusion by undertaking a fundamental review of how best to plan for future movement across south and east Oxfordshire.

Background

5. 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.

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

    6.1 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.

    6.2 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.

    6.3 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.

    6.4 The impact of the Covid-19 pandemic will have a long-term impact on traffic movements. 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 totally destroyed.

6.5 The council's draft 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 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.

6.6 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.

6.7 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 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.

6.8 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.

6.9 The 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 these 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 and match its cloth accordingly.

6.10 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.

Conclusions

7. This application should be refused.

8. 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).

9. POETS therefore advocate that the county council pauses progress on these schemes while it undertakes a fundamental review of its transport network that:

    - reflects the developing LTCP and the measures needed to dramatically increase walking, cycling and public transport use
    - reflects changing national policies on the need to reduce car use and decarbonise transport
    - reassesses new patterns of movement post-Covid
    - takes into account growing use of the internet that reduces the need for physical movement
    - incorporates agreed development plan decisions
    - reflects affordability, both revenue and capital
    - addresses the climate emergency and the likelihood that central government will in future prioritise funding for measures that support carbon reduction.

10. 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.

11. POETS will also be making a submission on the detail of the flawed Environmental Statement that accompanies this application.