**Objection by Oxfordshire Roads Action Alliance (ORAA) to Planning application R3.0010/24 for a proposed new road at Watlington.**

ORAA objects to the proposal on the following grounds. We also consider that the traffic modelling is inadequate and needs to consider the wider impacts on the surrounding network and not merely the junctions within Watlington itself before the application can be considered.

Based on the information we have available, we highlight the following conflicts with the Development Plan and material considerations and that the application should be refused.

1. The proposed road as applied for differs from the principle of development that South Oxfordshire District Council relies on. SODC says the road realises the ambitions of the Watlington Neighbourhood Development Plan to secure an "Edge Road to divert through traffic around Watlington". (SODC consultation response 1st March 2024).

2. There is no reference in the WNDP to an "edge road" (this is an undefined, unrecognised highway term used by SODC). Results from public consultation on the proposed Watlington Relief Road as applied for held by the applicant during  20th Feb - 20th March 2023 have been published for the first time with the planning application. These show 39% support, 26% object and 32% have concerns with the proposed road.

3. The road applied for does not accomplish what is implied by an "edge road" around Watlington. The proposed road has residential development along both sides, its outer and inner edge, new public amenity areas on the north side, importantly new school playing fields, development requiring planning permission; new areas of public amenity spaces associated with new housing and new public picnic areas; all are on the far side. The scheme does not deliver the principle of development of forming an edge around Watlington, or divert through traffic "around Watlington" which SODC claims it does.

4. As a result of the proposed road being within the urban extent of Watlington, it fails to achieve the traffic mitigation benefits stated  by SODC: "The proposal will also provide traffic mitigation for the allocated housing developments around the town." The scheme is 30mph, to HGV specification, and incorporates roundabouts with wide bellmouth junctions convenient for HGVs turning but inconvenient for vulnerable road users - WCH - walkers, cyclists and horse riders. It is contrary to OCC's Local Transport and Connectivity Plan (LTCP) road user hierarchy and the Highway Code. It is designed as a distributor road to prioritise motor traffic over vulnerable road users. Contrary to SODC's claim of traffic mitigation for new housing developments, there are no speed-reducing features to avoid issues of separation and road safety such as changes in vertical and horizontal alignment. The knowledge the road will encourage speeding on residential roads has led to a wiggly route but the curves are well beyond anything that will naturally slow drivers.

5. SODC refers to Watlington Sites A,B and C and effective traffic mitigation measures secured on planning permissions. For clarity, there were no objections to granting all three planned housing sites from OCC or SODC, on highway safety or air quality grounds, and there is no condition on occupation dependent on building of a relief road (SODC 5 year HLS 2023 Sites 1937, 1938, 1939).

6. The effective traffic mitigation measures SODC refers to secured on P17/S3231/O and required by the highway authority at the time the application was granted have not been implemented by OCC. It cannot therefore consider the highway network is currently gridlocked otherwise it would implement them. SODC says the "effective traffic mitigation measures" secured on P17/S3231/O were  "temporary" until such time as a relief road is built. However, no decision was taken on building a relief road when Pl 7/S3231/O was granted. The application did not include a relief road and was granted as a standalone development with a cul de sac access road off Britwell Road.

7. It is several years on since Pl 7/S323l/O was applied for and granted. The  need for a relief road, or the secured "effective traffic mitigation measures" or other alternatives to a road capacity scheme has to be decided against the latest national guidance and most up to date policies, not the policy environment of P17/S3231/O. This includes the LTCP as a material consideration not in place at the time of P17/S3231/O.

8. Regarding allocated housing at Watlington, PDAS 3.2.2 states: "Without the WRR, the cumulative impact of these developments would have a severe impact on the existing traffic situation and worsen air quality in the centre of Watlington." The highway authority has not implemented the effective traffic mitigation measures and it did not object that the planned housing would have a severe impact having secured the "effective traffic mitigation measures. Air quality has improved with a downward five year trend. No action on air quality is required as the Air Quality Objectives have been met.

9. As referenced, the need to build the proposed relief road will be considered against the most up to date policies and national guidance in place now. OCC's Local Transport and Connectivity Plan policy 36a states: OCC will: "Only consider road capacity schemes after all other options have been explored" Given it has secured effective traffic mitigation measures but not implemented them, Policy 36a requires these measures should be implemented and evaluated before consideration of a road capacity scheme. On road capacity schemes, OCC's transport plan says "new roads, or widening roads and junctions may be necessary, but this is not a sustainable long term solution because we have found that road schemes often generate new demand and quickly reach capacity again."

10. SODC quotes P2 of the Watlington Neighbourhood Development Plan 2017-2033 and policy TRANS3 of the South Oxfordshire Local Plan 2035 for compliance for the proposed road with the Development Plan.

11. WNDP is over five years old. Policies in neighbourhood plans are "locally specific planning policies" to the parish (SODC Notice of WNDP Consultation Period 13 December 2017 to Midnight on Sunday 28 January 2018). "Locally specific policies" in NDPs (SODC) are not strategic policies and apply only to the designated parish area. WNDP P2 states: "a. Proposals for development on allocated sites to the north and west of Watlington should provide land to safeguard a route for a re-aligned B4009 in accordance with the indicative route. (See Figure 11)"

12. Section 38A(2) of the Planning and Compulsory Purchase Act 2004 provides: "A "Neighbourhood Development Plan" is a plan which sets out policies (however expressed) in relation to the development and use of land in the whole or any part of a particular neighbourhood area specified in the plan". i.e. a Neighbourhood Plan must be a land use plan. WNDP includes an aspiration to realign part of the public highway controlled by the highway authority, Oxfordshire County Council. NDPs do not have powers to act as the highway authority or to include policies and aspirations of communities, such as realigning part of the public highway, must be clearly labelled as such and are not policies that are part of the Development Plan. See PPG 005 Reference ID: 41-005-20190509 and Paragraph: 004 Reference ID: 41-004-20190509

13. Policy TRANS3: Safeguarding of Land for Strategic Transport Schemes states 3.1.  Land is safeguarded to support the delivery of the following identified transport schemes...... a bypass for Watlington. Appendix 5 page 271 is SODC Safeguarding map Land for a bypass for Watlington. PDAS 3.2.4 incorrectly states safeguarding was carried over from the previous Local Plan. A Watlington bypass is not identified in the LTCP, LTP4 or Annexe 1, the carry over document, as a scheme the highway authority has identified is needed. The application is not for a bypass. The proposed scheme is not within the land safeguarded for a Watlington bypass as shown in Local Plan consultations. There has been no public consultation if there is support for a scheme as previously consulted on, on safeguarded land, versus the planning application and this is an oversight to present the scheme for approval without first having consulted on this point, which needs to be corrected.

14. TRANS3 5. requires the impact of the scheme to be subject to thorough assessment. This will include full environmental and archaeological assessments working in association with the relevant statutory bodies. Where schemes are located in areas of Flood Zones 2 and 3, a flood risk sequential test and the exception test should be undertaken as part of the appraisal process.

15. ES Chapter 3 Consideration of Alternatives summarises the options assessment framework completed at the optioneering stage based on the Transport Appraisal Guidance from DfT. The highest scoring options for the Route Section A were A1 and A2&4-B4. 6.2.1 of the OAR concluded: " In line with the TAG guidance on option appraisal, further assessment of the shortlisted options is required" (for Route Section A this was A1 and A2&4-B4).

16. The applicant will need to carry out the sequential test on the two alternatives for Route A of A1 and A2&4-B4 before a decision can be made that A1 is a preferred route. ES Chapter 3.7.22 states: "The Proposed Development, as summarised in Volume I Chapter 04: The Proposed Development follow the align of Route A1 through Link 1 to Junction 2." No sequential test has been completed to select this route over the equally high scoring A2&4-B4. Both routes are on safeguarded land. A2&4-B4 scored highly due to the potential to utilise existing road networks adjacent to the industrial estate and to reduce the extent of new road infrastructure across the wider landscape.The option would retain mature vegetation across the fields to the north Option A1 was least preferable from a water environment perspective given it would require an entirely new crossing of Chalgrove Brook and cross the largest areas of Flood Zone 3 (and would be likely to require the most significant floodplain compensation and therefore land take for this aspect of mitigation). All other Site A options to A1 were said to cross only small areas of Flood Zone 2 and 3 and appear to make use of an existing watercourse crossing.

17. Policy TRANS lb: Supporting Strategic Transport Investment ii) support measures identified in the Local Transport Plan for the district including within the relevant area strategies. A relief road is not a component of an area strategy given no area strategy exists and will have to show it supports measures in the adopted LTCP including 25% reduction in private car journeys by 2030. It is acknowledged the scheme does not deter private car journeys (PDAS 6.4.14).

18. The PDAS states 1.1.4 The Proposed Development also aims to assist OCC's commitment to the Housing and Growth Deal in delivering housing and jobs to the local area. This is reference to the scheme having attracted a quoted £7.lm of forward finance from the Oxfordshire Housing & Growth Deal Infrastructure Fund towards the County Council constructing the project. The purpose of the fund is to accelerate the delivery of  8,473 planned houses by March 2025 by delivering £150m infrastructure forward financed by government.  Forward finance is required to be recouped from unlocked housing generating developer contributions.

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19. Policy INFl: Infrastructure Provision 3 3. Infrastructure and services, required as a consequence of development, and provision for their maintenance, will be sought from developers, and secured through planning obligations, conditions attached to a planning permission, other agreements, and funding through the Council's Community Infrastructure Levy (CIL) or other mechanisms. This applies equally where external funding for infrastructure necessary for development has been secured (including where the infrastructure is delivered ahead.of development), on the expectation that funding shall be recovered from development, (our highlight).

20. For this to be an effective policy requires in the region of an additional 900 homes unlocked by the proposed road in order to recycle the forward financing. These 900 additional homes have not been identified by the applicant and evaluated and instead the road is proposed to unlock 400 planned houses. The ineffectiveness of implementing the scheme conflicts with Policy INF1 3 and does not make a proportionate contribution to achieving the objectives of the H&GD of accelerating the delivery of 8,473 planned homes by March 2025.

21. The PDAS 3.1.1 sets out the need for the scheme. An aim is a reduction in traffic in the centre which is designated as an Air Quality Management Area (AQMA). Defra prescribes where Local Authorities declare and revoke AQMAs and Watlington AQMA meets the criteria to be revoked soon and is not therefore justification for constructing a road.

22. As a component of a sustainable transport strategy, a 30mph distributor road prioritised for motor vehicles, including HGVs, is at odds with encouraging active travel in and around the Watlington area. There is no bus infrastructure.

23. The scheme is needed to improve the accessibility of Watlington (3.1.1). This acknowledges the scheme is a relief road, to relieve the centre. There has been no assessment of the impact of diverting traffic on thriving independent retailers who benefit greatly from passing traffic and without it will have unviable businesses. ORAA is supportive of Watlington's high street independents. PDAS 6.4.14 refers to further schemes that are not part of this application. The  relief road's aim is to make Watlington more accessible and any subsequent schemes would have to consider access to Watlington to visitors and through traffic vital to its high street economy. Implementation of the effective traffic management measures secured on P17/S3231/O would make Watlington more accessible without the need to build a relief road.

24. ORAA is supportive of SODC's Heritage Officer on HARM to heritage assets. ORAA has had sight of objection from the County Archaeologist. TRANS3 5. requires a full archaeological assessment.

25. ORAA supports the objection of the Chilterns Conservation Board, 20th February 2024. LVIA assessment - the scheme as a whole should be assessed by ref to the single highest adverse impact. (TAG unit A3 Para 5.3.19 requires that 'large' adverse impacts are not diluted by less adverse impacts elsewhere).