

Road Ahead Not Suitable for HGVs

Planning Inspectorate Appeal Reference APP/V3120/W/22/3305957

Statement of Case

Rowstock Residents Association



Rowstock Roundabout northern exit during A34 diversion. This road is the southern approach to the site. Equation and OCC Transport estimate 55% of the vehicles using the site will arrive or leave by this route.

Contents

1. Introduction	3
2. Background	4
3. The Proposal Represents an Overdevelopment	5
4. Noise and Disturbance	8
5. Inadequate Transport Mitigation	9
6. The Planning Balance	13
7. We are not NIMBYs so what are the alternatives?	15
8. Conclusion	17
9. Appendices	
A. What Community Engagement was conducted by Equation?	18
B. Facebook comments on traffic noise relating to A34 diversions through Rowstock.	19
C. Operational Traffic Flows, Table 3.1 from the Applicants Noise Assessment	22
D. National Planning Policy Framework Guidance on Noise	23
E. Department of Transport Road Traffic Statistics 2000-2021	25
F. RRA map of locations referred to under Section 5.	26
G. Speed Indicator Device Data.	27
H. Does the Vale have a job shortage or a shortage of labour?	28
I. Documents to which RRA will refer	29

1. Introduction

- 1.1. Rowstock Residents' Association¹, ("RRA"), was formed in 2021 to safeguard and promote the interests of the residents and businesses in the area encompassing the A4130 from Steventon Hill Lights to North Drive on the A4185 including the village of Rowstock and along the A417 toward Harwell and East Hendred, on matters concerning traffic and associated issues.
- 1.2. RRA aims to improve living conditions in relation to the above for residents living within RRA's area. We are a non-party political Association and are committed to representing the views of all residents and businesses in our area.
- 1.3. RRA are not 'experts' by any means, but we do have local experience, knowledge and views on the proposal and its impact. What follows in this Statement of Case (SoC) expresses those views and concerns and the RRA intends to call evidence at the Inquiry to support what is set out here.

¹ <https://rowstockresidents.co.uk>

2. Background

- 2.1. In early 2021, residents within a 1.5km radius of Milton Hill Technology and Business Park were sent a single sheet of marketing information about the proposals for a Distribution Centre next to Milton House Hotel (MHH). **Appendix A** contains an image taken from the s Community Engagement Plan and shows the area in which the residents live that were sent the document. Since then, there has been no engagement with the community at all.
- 2.2. You will notice that it excludes the inhabited areas of Steventon, Rowstock, Harwell, and East Hendred whose residents are equally concerned about this proposal. All Parish Councils (PCs) representing these residents oppose this application. The majority of those now living at Blaise Park, were not included within the Applicant's limited engagement with the community. RRA's view is that residents in these areas were denied an opportunity to comment in the early stages and were only alerted by the LPA once the Planning Application was submitted.
- 2.3. Many residents have commented on the application and signed our petition which currently stands at over 1,100 signatures. The summary of our petition can be found at Change.org <https://chnng.it/rsjvSW8YQk>
- 2.4. It seems to RRA, that the LPA and OCC officers despite opposing the application initially, changed their minds and supported it in the final few weeks before the Planning Committee meeting. No significant changes were made to the application and no obvious reason appears for the change of heart. Subsequently the application was recommended for approval by Officers. Following representations made at the Planning Committee from MHH, County, District and Parish Councillors, RRA and others all opposing the application, the Applicant was questioned in detail and failed to produce satisfactory answers as were the Planning Officers². As a result, the Planning Committee unanimously rejected the application on multiple grounds including conflicting with multiple Core Policies (CP) and National Planning Policy Guidance (PPG).
- 2.5. In their Refusal of Planning Permission, four reasons were given:
- Overdevelopment conflicting with Core Policies of the Local Plan 2031.
 - Noise and Disturbance conflicting with Core Policies and Development Policies of the Local Plan 2031 and the National Planning Policy Framework.
 - Inadequate Traffic Mitigation conflicting with the Core Policies and Development Policies of the Local Plan 2031.
 - Lack of a Section 106 agreement.
- 2.6. This document sets out RRA's position on the first three of those reasons. Those reasons are compelling, and the Inspector should accept them.
- 2.7. Before turning to RRA's analysis of the proposal and the LPA's reasons for refusal, RRA notes that the Applicant seeks to rely on a lapsed grant of permission in support of the proposal. This should be disregarded as that permission is no longer extant. It cannot now be implemented and merely represents a development that was acceptable at the point in time permission was granted, under a previous version of the Local Plan. Such a permission cannot be said, with any certainty, to be acceptable now.
- 2.8. RRA notes that the LPA (at 1.2 of its SoC) includes a link to the recording of the Committee website. RRA would encourage the Inspector to consider this recording either before, or during, the Inquiry.

² RRA notes that the LPA (at 1.2 of its Case Statement) includes a link to the recording of the Committee website. RRA would encourage the Inspector to consider this recording either before, or during, the Inquiry.

3 The Proposal Represents an Overdevelopment

- 3.1. The first reason the LPA gave for refusal is Overdevelopment and that. ***On this basis the development conflicts with the Core Policies 28, 37 and 44 of the Vale of White Horse Local Plan 2031 Part 1.***
- 3.2 LP 2031, CP3 on Settlement Hierarchy, also states that '***Smaller Villages (like Milton Heights) have a low level of services, where development should be modest and proportionate in scale and primarily to meet local needs***'. We believe that this proposal cannot be described as either.
- 3.3 CP28 states '***Proposals for new employment development (Use classes B1, B2 or B8) will be supported on unallocated sites in or on the edge of, the built-up areas of Larger and Smaller villages provided the benefits are not outweighed by any harmful impacts, taking into account***

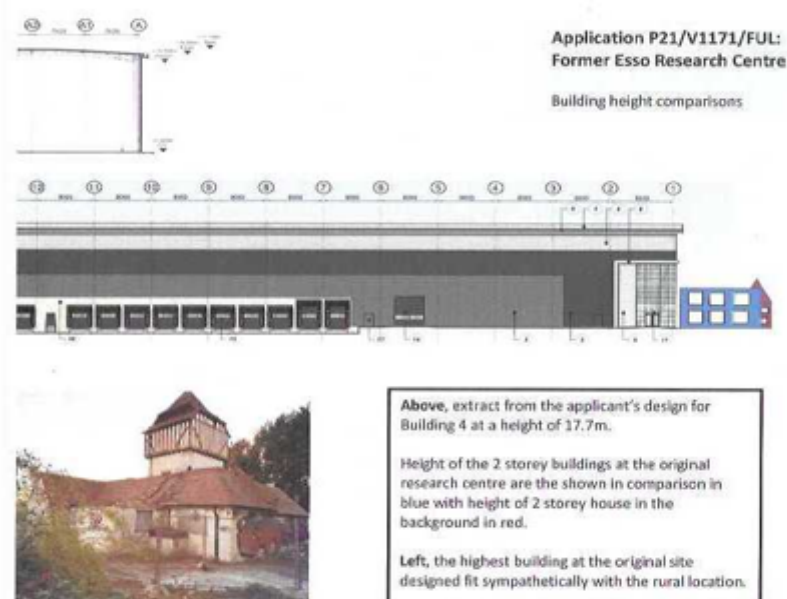
3.3.1 ***(i) The effect on the amenity of nearby residents and occupiers***'.

The noise, vibration and pollution generated by hundreds of additional HGV movements, including at night, where currently there are very few, is clear evidence of loss of amenity. This point is covered in more detail in Sections 4 and 5. The Noise Survey and Transport Assessment make assumptions that will be contested in our PoE.

3.3.2 ***(iii) The scale, nature and appearance of the employment development and its relationship with the local townscape of landscape.***

This proposal is for a very large warehousing, distribution and logistics hub with huge buildings that are totally incongruent with the local rural landscape and with any current or previous occupant of the land. The whole of the Infinium building (the other occupant of the site – a small office block) its car park would fit inside just one of the four warehouses.

The illustration below shows the height of the proposed buildings set against that of a two-storey building and the height of the tallest building on the original Esso Research site. It also shows a photograph of the tallest building on the original site (a water tower) designed to fit in with the character and style of the locality.



3.3.3. ***(iv) the proposal cannot reasonably be accommodated on employment land identified as vacant or developable.***

In the Market Report of 2021, the Applicant convinced the Planning Officer that the proposal cannot be reasonably be accommodated on employment land identified as vacant for development and that there was huge and growing demand for this type of development. This report was compiled with data from 2020.

Despite the assertions in the Market Report, new warehousing and logistics developments have been constructed at Didcot A (Signia Park) and Didcot Quarter with opportunities from 61,000 sq ft - 640,000 sq ft.

There is a current planning application, dated 2nd August 2022 for 197,000 sqm of B8 development on 29 hectares of land west of Didcot A Power Station, ref: P22/V1857/O. The Council's Employment Land Review estimated that the site had capacity for 236,699 sqm of floorspace to create 3,381 jobs. Redevelopment would regenerate a contaminated site, within the urban area of Didcot Garden Town, with potential for a rail freight terminal controlled by the Applicant.

Both Signia Park and Didcot Quarter locations will benefit from the new £70m Didcot Science Bridge and the dualling of the A4130 to dual carriageway from this new bridge to the A34.

At the very least the outdated Market Report should be treated with some scepticism amid growing reports of a slowing down in demand for new warehousing away from the centre of gravity of the motorway network in the Midlands (*'The end of the warehouse bubble'*, Financial Times 7/8/22).

Our PoE will discuss the demand and supply of employment land to inform discussion on the need for the development, and whether the need outweighs the adverse impact.

3.3.4. ***(v) it can be demonstrated that the proposal will benefit the local economy and will not undermine delivery of the strategic employment allocations.'***

As there is less than 3% unemployment in the area the site would bring little benefit to the local economy in terms of meeting local employment needs, and indeed, what little benefit it would bring is clearly outweighed by the harm.

The redevelopment of Harwell Campus is one of the leading Science and Innovation Campuses in Europe, with 6,500 jobs in 225 organisations. A constraint on development is Highways England's Holding Objections to two recent applications, because of development on the A34 Chilton Interchange. This junction will carry significant southbound traffic from the A34 to the appeal site.

Further information on this will be provided in PoE as to whether development of the appeal site will prejudice development of the Strategic Employment site at Harwell Campus.

3.4. The Council's first reason for refusal directly relates not only to CP28, CP37 and CP44 but also to CP3 and Development Policies 21 and 29.

CP3 limits the scale of development to that which is modest and proportionate to providing for local needs.

CP28 (iii) limits the scale, nature & appearance of development to that which in keeping with the landscape character.

CP37 relates to Design and Local Distinctiveness, requiring that development reinforces local identity by the creation of a distinctive sense of place which is integrated with its surroundings incorporating links to Green Infrastructure, landscaping to enhance biodiversity and meet recreational needs.

CP44 protects the landscape from harmful development, e.g. trees, the landscape setting of settlements, tranquillity and the need to protect against light pollution, noise and motion.

DP21 relates to protecting the landscape character from the impact of external lighting.

DP29 on Settlement Character & Gaps protects the diminishing of physical & visual gaps between settlements.

Further information will be provided under Proofs of Evidence (PoE) to show that Good Practice has not been followed regarding biodiversity net gain, particularly in relation to the Open Mosaic Habitats on Previously Developed Land, which accounts for most of the loss.

Our PoE will assess the impact of development, such as its height, on the character and appearance of the surrounding area in accordance with these Policies.

- 3.5. There is clear evidence that the proposal does not meet any of the policies listed above.

4. Noise and Disturbance

4.1 The Second Reason for Refusal is;

Due to 24hr operation of premises, the proposal would result in noise and disturbance late at night in the vicinity of the site to the detriment of the neighbouring properties and business. The location of the proposed buildings and the nature of the proposed business operation (linked to the Class B2/B8 uses), relative to nearby neighbouring properties and businesses would be harmful to their amenity, contrary to CP 28 of the Vale of White Horse LP Part 1 and Development Policies 23 and 25 of the Vale of White Horse LP Part 2; and Paragraphs 185 and 187 of the National Planning Policy Framework.

4.2 Residents have concerns regarding noise of thousands of HGV journeys routed past our homes as they arrive and depart the site along the A417, A4185 and A4130. Roads that are, in parts, being considered for 20mph zones.

The Applicant has claimed that there are no residents, when many live alongside the roads named above sometimes within 10' of passing HGV's. These residents have already experienced the noise and disturbance of HGV traffic over-night due to the regular occurrence of night-time A34 diversions generating convoys of HGV's noisily thundering through our villages in the dead of night, often speeding, as they look to make up time. This situation is well-known and accepted by the County, District and affected Parish Councils and our MP.

4.3 **Appendix B** shows a sample of comments made regarding these diversions and the distress they cause. This application will turn this occasional nuisance into a permanent nightmare with the inevitable effect on health and well-being.

4.4 The revised Noise Assessment July 2022 produced by TetraTech and contained within the Applicant's SoC shows a worst-case scenario of HGV movements (**Appendix C**). These numbers reflect the actual capacity of the site meaning 2,000 HGV trips every day of the year operating all day and all night. Importantly it underestimates the noise impacts arising from the proposal.

4.5 OCC Highways have accepted a figure of 55% of departures going south through Rowstock and 45% north towards the Milton interchange. It means during the night, when the local A-roads are empty and background noise levels very low, around one HGV every two minutes will noisily trundle past our homes some of which are within 10 feet of passing traffic.

4.6 The conclusions of this study beggar's belief. It states:

'Therefore, with the proposed appropriate scheme of mitigation, the proposed distribution facilities are not expected to have an adverse impact on health or quality of life.'

4.7 How can this conclusion be reached when the site will generate hundreds of night-time HGV journeys on rural roads that are otherwise empty and silent? The answer lies in the evidence presented by the Applicant's consultants and selective quoting of the PPG on Noise. **Appendix D** covers the PPG on Noise and RRA's comments relating to the Applicants Noise Assessment.

4.8 OCC's 'Transport for New Developments: Transport Assessments and Travel Plans'³ (March 2014) states that applications should include 'important variations in travel patterns according to time of day' something that is particularly important in relation to a 24/7 logistics operation. This critical information does not appear in any of the documentation relating to the application and the Noise and Transport Assessments are silent on the subject.

³<https://www2.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/roadsandtransport/transportpoliciesandplans/newdevelopments/TravelAssessmentsandTravelPlans.pdf>

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- 4.9 The Applicant has completed a limited analysis with the notable absence of a discrete night-time analysis at the full range of receptors (TR1-TR19) and ignored the wider requirements within the PPG on Noise⁴, which if considered, would result in a very different conclusion that would provide evidence of harm to the amenity of residents from the operation of the site and so fall foul of CP28. **Appendix D** covers this in more detail.
- 4.10 For residents suffering the long-term effects of noise and sleep disturbance and the consequent damage to their well-being, no mitigation can be introduced to nullify this harm. Most homes are already double glazed and open windows are needed in the summer months.
- 4.11 The Noise Survey makes assumptions that will be contested in our PoE to show that development will not comply with the CP28 and CP44, DP23 on the impact of development on amenity, DP25 and 26 on Noise Pollution and Air Quality and on the PPG.

5. Inadequate Transport Mitigation

5.1. In their Refusal of Planning Permission, the Head of Planning stated the third reason was,

The proposed development fails to provide adequate transport mitigation measures to ensure the development would not impact the highway network and highway safety and fails to deliver adequate sustainable transport. Accordingly, the proposed development would conflict with Core Policies 33 and 35 of the Vale of White Horse LP Part 1 and Development Policies 16 and 17 of the Vale of White Horse Local Plan 2031 Part 2, as well as paragraphs 110, 111 and 112 of the National Planning Policy

- 5.2. Much weight has, and should, be given to the increase in vehicle and HGV numbers. This is because the volume and type of vehicle has the potential to hugely impact the right to amenity of residents and local businesses.
- 5.3. Following the questioning of Equation by the Members of the Planning Committee at the planning meeting of February 2022, requiring them to justify why their quoted AADT vehicle number of 57,741 made the Rowstock Roundabout busier than the A34 between the Milton and Chilton Interchanges, Equation now admits (Highways SoCG paragraph 6.5), that the figures quoted for vehicle numbers were found '**not to be a fully representative AADT calculation of the total movements**'.
- 5.4. As a result, the Applicant has now submitted new data for 2022 showing daily traffic flows for the A4130.
- 5.5. RRA can demonstrate using DoT data for years 2000-2021 (**Appendix E**) that the Appellants AADT 2022 data for HGVs is nearly double of the actual HGV figures as are the Appellants total vehicle numbers when compared to the actual 2022 data.
- 5.6. RRA can prove using publicly available data for 2022 from Speed indicator Devices (SIDs) placed by local Parish Councils capturing both northbound and southbound vehicles at the Rowstock roundabout and indeed OCC's own traffic counters sited at the geographical position just north of Rowstock roundabout that the existing daily traffic volumes, quoted by Equation and used to justify their case, are still inaccurate. See table below.

Source	Location (see Appendix G)	Year	Vehicles
SID AAWT	Rowstock Southbound & Northbound Weekday	2022	8,200
DoT AADT	A4130 North of Grove Rd	2019	9,900
OCC AADT ***	**North of Rowstock Roundabout	2018	7,900
Equation AAWT	**Between Grove Rd and Reading Rd	Predicted 2022	13,818*

All data is both directions and measured between Featherbed Lane and Rowstock Roundabout

* using Equations data from Noise Assessment table 3.3 - 18hr AAWT link number 20 – adjusted for 24 hours.

** exactly the same location

*** OCC Traffic Database

- 5.6.1. Referring to Equations SoC, Noise assessment – Table 3.3, data is provided for **18hr Annual Average Weekday** Traffic only, being standard methodology. However, RRAs concerns relate to overnight HGV traffic. The Tetrtech Noise Assessment Table 3.1. suggests a worst-case scenario of 500 night-time HGV movements which set against the typical 200 (all vehicles) creates a very serious concern for us and which has been covered in Section 4.

- 5.7. The Applicant has again submitted new data for 8-9AM and 5-6PM peak hour ONLY traffic flows in and out of the site (Highways SoCG para 10.1). They have omitted traffic data for vehicle movements across the other 22 hours. RRA will provide evidence to show Distribution Operation peak hours are typically not in line with general traffic peak time, for instance FMCG businesses drive huge out-bound flows in the early hours of the morning. Our comments regarding the eventual occupants made in paragraph 4.2 are also relevant here. During the inquiry, RRA will seek to provide expert evidence that suggests the actual numbers are much higher.
- 5.8. Referring to Highways SoCG para 10.1, Equation states that *“the scheme has the potential to generate up to 306 two-way vehicle trips (of which 19 would be HGVs) in the AM peak hour and up to 283 two-way vehicle trips (of which 4 would be HGVs) in the PM peak hour.”*
- 5.9. However, they claim in the SoC Noise Assessment para 3.3, *‘The following calculations have been used to represent HGVs arriving/exiting along the access road.’..... ‘the following HGV movements have been assumed based on the number of docking stations specified in the layout plan. **In a worst-case hour period 50 HGVs are predicted to arrive/leave along the access road during the daytime and 13 HGVs in a 15-minute period at night- time.** Worst-case noise-levels have been calculated using this data to represent a worst-case in any 1- hour daytime (07:00 – 23:00) period and **15-minute period during the night-time** (23:00 – 07:00).’*
- This again conflicts with Table 3.1 (**Appendix C**) from the Applicants Noise Assessment which shows arrivals but not departures.
- So which HGV movements per hour are correct? During the day 19, 50 or 100? and night 25 ,50 or 52 (13 per 15-minute period)?
- 5.10. RRA agrees with the Appellant that the site can support 50 docking events an hour. RRA will show that this will produce 5 times the current HGV vehicle movements
- 5.11. RRA are willing to accept that 100% utilization is unlikely (but not impossible). Using Equations own figures of 100 HGV movements per hour (50 HGVs arriving and presumably departing per hour) between 07:00 and 23:00, results in 1500 movements over that period and 50 movements per hour between 23:00 and 07:00 results in 416 movements. A total, over 24 hours, of 1,916 HGV movements. RRA will show that this is 4 times the current number for 2022 of HGVs movements.
- These calculations are based on Equations own data and is why Equation are seeking to overestimate the existing daily vehicle numbers and hide the true projected number of HGV trips over 24 hours to justify a significantly lower percentage increase in HGV movements.
- 5.12. RRA can show that Equations data is meaningless, inaccurate and inconsistent.
- 5.13. In conclusion, RRA can and will show that Equations’ data is riddled with errors. Vehicle and HGV numbers are over or under exaggerated and/or selectively used to minimise the projected growth in vehicle/HGV numbers and therefore the impact on the amenity of the residents and businesses. A more realistic analysis suggests a 400-500% increase in HGV trips relating to the proposed development with implications for noise, pollution, congestion and mitigation and ultimately leading to the loss of right to amenity of residents.
- 5.14. Despite the Appellant admitting that their original AADT data was ***‘not to be a fully representative AADT calculation of the total movements’***, the Appellant still has not submitted full, proper, consistent and accurate AADT data for all vehicles and HGVs over a 24-hour period. RRA continues to support the LPAs decision that the proposed development fails to provide adequate transport mitigation measures to ensure the development would not impact the highway network. In addition, RRA maintains that this proposal fails to meet criteria (i) CP28 due to the loss of amenity to residents.
- 5.15. PoE will provide information on discrepancies and omissions in the appellant’s trip generation and distribution based on recent traffic counts, and local modal split data and growth rates rather than modelling and national growth rates.

Proposals will be assessed against sustainability policies CP33, CP35, CP15b on Harwell Campus and 16b on Didcot Garden Town and against DP16 and 17 on Access and Travel Plans.

The PoE will consider whether the proposals take account of sustainability targets or mitigation set out in the 5th Edition Local Transport Plan, which promotes rail freight, which supersedes the 4th Edition.

They will focus on cycling initiatives e.g., the off-road Harwell Campus - Milton Park cycleway proposals via Rowstock and infrequent bus services between the Transport Hubs of Wantage, Harwell Campus, Milton Park and Didcot.

6. The Planning Balance

6.1 CP28 requires the LPA to consider if, *'the benefits are outweighed by any harmful impacts'*.

Points in favour	Points against
The only possible case for this development is jobs and economic growth (criteria (v)) of CP28. The Applicant has suggested jobs in the range of 600-1200.	There is a very real possibility that, in a location with full employment, as with other similar sites in the UK, the promised jobs will never be filled. Consequently, any economic boost to the area would be limited. Growth in the south Oxfordshire area would be boosted to a much greater level with the influx of high-paid jobs required by cutting edge science and research facilities consistent with the Science Vale.
	The proposal does not satisfy the requirements of Local Plan 2031 CP28 when criteria (i), (iii), (iv) and (v) are assessed against it PPG on Noise has not been followed in several areas, sections quoted selectively and incomplete noise surveys undertaken resulting severely flawed conclusions, Non-compliance with both these documents will result in harmful impacts on residents as detailed elsewhere in this report.
	Under the Planning and Compulsory Purchase Act 2004 (PCPA 2004) LPAs must exercise their powers with "the objective of contributing to the achievement of sustainable development". We say this development is not sustainable because of the adverse impacts on the social, economic and environmental impacts it imposes on the locality. There are other, more suitable, options for the site.
	RRA can and will show that Equations' data is inconsistent and riddled with errors. Vehicle and HGV numbers are over or under exaggerated and/or selectively used to minimise the projected growth in vehicle/HGV numbers.. A more realistic analysis suggests a 400-500% increase in HGV trips relating to the proposed development with implications for noise, pollution, congestion and mitigation and ultimately leading to the loss of right to amenity of residents and businesses.
	As with other similar sites around the UK, local roads are likely to be blighted and clogged up by parked HGVs waiting for their timeslots and using the verges and shrubs for toilet facilities – something which already happens in the area. No consideration has been given to lorry parking, either at the development or for overnighting.
	A Climate Emergency has been declared by both OCC and the LPA. Yet, this development will unleash thousands of HGV journeys a year with the consequent emission of a huge amount of greenhouse gases into a rural environment.

6.2 The only case for the development concerns jobs and economic growth but in area with full employment there the claimed benefit to the local area may never be realised. It's unlikely that people will relocate to a high cost area to work in warehouses. **Appendix H** provides more details.

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- 6.3 Set against the Applicants rather unreliable claims relating to benefits, there are many concerns with this application and reasons for refusal that are clear and unarguable including adherence to Local Plans, PPG, excessive and harmful levels of noise and the Climate Emergency declared by local government.
- 6.4 The balance between for and against is clear. The case against the development is over-whelming. The application should be refused.

7. We are not 'NIMBYs' so what are the alternatives?

- 7.1. RRA knows that the site will be developed . Why not a research or business centre? After all that is what is now there and has been historically. The photograph below shows the original low-rise Esso research laboratories



- 7.2. Compare the above with the 3D illustration below of the proposal set into the landscape area clearly showing its location in rural south Oxfordshire together with the location of The Packhorse pub, Milton Hill House Hotel, Infineum offices and residential areas.



- 7.3. This provides further clear and compelling evidence in support the LPA's first reason for refusal concerning overdevelopment.

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- 7.4. The 'Science Vale' as it is known has world-class businesses involved in the growing UK space industry, nuclear fusion and life sciences. The European Space Agency has its Headquarters 2 miles away at Harwell Campus, a site which also includes the government funded vaccine factory and Oxford Nanopore, a world leading firm in gene research. This is an ideal site for businesses that complement these and many other high-tech firms at the Campus. Other uses could be a film studio complementing the one established at Milton, research into renewable energy or a solar farm.
- 7.5. Recent features in the Financial Times, dated August 2022, support the case for turning away from distribution (*'End of the Warehouse bubble'*) and towards laboratory and research sites (*'Lab space shortage threatens life science boom in Oxford and Cambridge'*).
- 7.6. Any of these businesses would create a superior economic business case than the flimsy version presented by the Applicant. The same council tax receipts would apply as the proposal and the high-skilled jobs would attract scientists to the area. A development of this type would be of tremendous benefit to the area and to the UK economy and reputation in these growing industries.

8. Conclusion

- 8.1 The Applicant has argued in the original application and the appeal that the plans comply with Local Plan 2031 and the PPG. In support of their assertions, they have engaged expert consultants in relation to many of their proposals including Planning, Transport, Noise and Market Conditions.
- 8.2 While the technical abilities of the organisations involved is not in doubt, our analysis, using local knowledge, other sources of information and adopting wider testing of the proposals against the PPG on Noise show that the reverse is true.
- 8.3. This is an application for a huge distribution and logistics complex sited on an elevated position within a rural setting with poor transport links while un-let buildings of the same type are available at Signia Park and Didcot Quarter where the infrastructure and facilities are suited to this type of business.
- 8.4. The development is not suitable at this location and is wholly inappropriate. The operation of the site will require **hundreds of thousands** of large, noisy, articulated HGV movements through local villages on a 24-hour basis, an alarming prospect for those already effected by night-time A34 diversions.
- 8.5 The area is gaining a world-wide reputation for the quality of the research conducted in our 'Science Vale. World leading space, life-sciences, and renewable energy (including Fusion) firms have made their homes here and are attracting high-skilled workers to the area. The site was, and is, in RRA's view more suited for use as a research centre, or other self-contained operation that has less of an impact on the locality and highways infrastructure.

Appendix A - What Community Engagement was conducted by Equation?

It is a requirement of the Localism Act that developers consult with local communities in relation to plans such as this.

In the Community Engagement Plan dated March 2021, the Applicant stated, '*a community update newsletter was also prepared and issued to around 248 residents and business surrounding the site.*' This was a two-sided single page of marketing. Nothing more. There have been no zoom calls, presentations or meetings. Nothing. It is accepted that Covid made some physical engagement difficult but not impossible.

In the Planning Statement issued by the Applicant dated a month later in April 2021, they stated that '*There are no nearby residents, and the closest two businesses are the De Vere Venues Hotel and the Infinium UK offices which are located immediately abutting the site.*' In fact, there are plenty of interested residents living along the A4130/A4185, the A415 and in local villages as shown by the many, many letters of opposition on the planning portal.



The map above also shows the main settlements surrounding the site and which were excluded from the limited consultation undertaken by the Applicant. These concern the village of Steventon, a village already plagued by HGV's relating to diversions from the A34 and accessing a small warehousing depot just outside the village. In addition, the main railway bridge over the Great Western line and which is a listed building is restricted to single lane of traffic to avoid damage to the bridge.

East Hendred, Rowstock and Harwell are villages lining A4130, A4185 and the A417 along which HGV's will access or leave the site on a 24/7/365 basis.

The consultation conducted by the Applicant omitted those local communities that will be most affected by the development given the number of additional HGVs that will crash, bang and roar through our small communities day and night.



Appendix B - Facebook comments on traffic noise relating to A34 diversions through Rowstock.

April 12, 2019

Did the noise from the A34 diverted traffic keep you awake last night? As per usual times were speeding and even hooting horns at 7am. I know the A34 diversion is only for a few nights longer, but I am again going to contact the PCCs, Oxfordshire CC and Police re speeding. We even had the Marcham diversion coming up to Rowstock again. Let's just hope the Chilton and Milton interchange works keep to their timetables and this time next year traffic is lighter!

1 Comments Seen by 5

Like

Comment

Share

Was bad last night, even for us. Nice of Oxfordshire County Council to keep us informed with one of their occasional newsletters (NOT)

Like Reply Share 0

It was dreadful.

Like Reply Share 0

June 5, 2019

My letter to OCC

Dear Sir

As a resident of Rowstock I am writing to complain about the complete and utter disregard to residents affected by the overnight closures of the A34 Northbound between Chilton and Milton and the diversion of traffic along the A 4185 and A4130.

Whilst I appreciate that the work needs to be completed OCC and the Highways Agency have shown a complete and utter disregard to the inconvenience and discomfort caused to the residents along the diverted route. Many house holder have properties immediately alongside the A4185 and A4130 and they are now about to suffer three weeks of nightly disruption (i.e. Monday to Friday) during the whole of June due to speeding heavy traffic that has been forced to take this diversion at a time of the year when they would dearly like to enjoy the pleasure of sleeping with windows open.

It seems to me that closure decisions made have shown zero consideration to those affected and have been put in place solely for the convenience of the contractors and no-one else.

May 20, 2019

I hope we can try and get some sleep with the diversion in place!

16 Comments Seen by 81

Like

Comment

Share

Most recent



Write a public comment...

👍 🗨️ 🔄 🗑️

View comments

Windows closed but house is shaking up at 2:30 so not getting much sleep anyway atm this doesn't help

Like Reply Share 2



July 11, 2019

Omg. More diversion nights. We should be compensated for loss of sleep!

3 Comments · Seen by 70

Like

Comment

Share



July 12, 2019

Apologies for length of article but definitely some details relate to residents regarding lack of sleep.

Perhaps this could also be brought to the attention of the authorities that be to consider when diverting traffic.

I don't think they've considered that we are also having diverted A34 traffic over the weekends in addition to those we have been notified of during the week nights.

THE SUN CO. UK

If you're getting fewer than 7 hours sleep a night 'it could kill you'



June 11, 2019

I spoke to [redacted] this morning following the televised and radio interviews. I received a letter several months ago regarding the closure of the A34 and responded on their web page with my concerns over noise and speed of traffic, having previously encountered them when A34 closed at night. I suggested average speed cameras or additional policing particularly as traffic approached the roundabout at speed and an accident was just waiting to happen.

More recently I have contacted Harwell Parish Council who advised me to contact the Police regarding the speeding element. They advised me that Councillor Stewart Lilly, who represents this area at County Councillor level, would be dealing with it. I emailed him, Ed Vaizey, our local MP, Reg Waite our District Councillor. Ed Vaizey suggested that I let Councillor Lilly deal with it but in his response he copied in Oxford OC. I have subsequently had correspondence from OCC and Councillor Lilly. Councillor Lilly advised me that he had spoken to the Superintendent at Abingdon Police Station who was going to ask his night patrols to check the situation.

OCC are aware that there is damage to the A4130, particularly when it rains the water does not adequately drain, and the drain cover which bangs each time a lorry goes over it.

I have advised Councillor Lilly of my lack of sleep due to the increased traffic noise and speed of it. I have also mentioned that my property vibrates as a consequence of these.

I am now phoning the Police as advised by three separate authorities to add my name to the list of complainants.

I am also emailing Ed Vaizey just in case he has missed the media coverage!


 May 29, 2015

Residents of Rowstock living along or near to the A4130 between Chilton and Milton may like to make sure they have an extra glass or two of wine tonight to help them sleep. The A34 is again closed overnight from 10pm until 6am but this time in both directions!

 1
  Comment
  Share


 Omg it was a nightmare last night my house actually vibrated and the aerial on roof vibrated too... why can't they put bloody 30 mph signs up at least to slow the massive lorries. So tired of it all. 🤔

Like Reply Share 2y
  1

Appendix C - Operational Traffic Flow table 3.1. from the Applicants Noise Assessment Document (July 2022)

Time Period	Type of Vehicle Movement	Trips per Hour
		Arrivals
Daytime (07:00 – 23:00)	HGV	50
Night-time (23:00 – 07:00)	HGV	25

The assumed traffic data indicates that 50 HGV deliveries per hour are expected during the daytime and 6 per 15 minutes during the night-time. Assuming that a typical loading event takes approximately 30 mins, it is predicted that up to 12 simultaneous loading events can occur during the night-time 15 minute reference period.

The numbers are only arrivals so with the numbers doubled to allow for departures we find totals to be 100 trips per hour in the daytime and 50 trips per hour overnight.

Day-time	16 hours x 100 movements per hour	=	1,600 movements day-time (0700 -2300)
Night-time	8 hours x 50 movements per hour	=	400 movements night-time (2300-0700)
Total			2,000 per 24 hours

With 55% distribution of the total, as agreed with OCC Highways, travelling from the south that gives 220 HGV movements over-night circa one every two minutes.

With 45% traffic heading north, slightly lower numbers (180) are calculated – still a huge number.

Appendix D - PPG on Noise 22/7/19

An extract from the PPG on Noise is shown below.

*'Noise needs to be considered when developments may create **additional noise or would be sensitive to the prevailing acoustic environment**'.*

*'Although the word 'level' is used here, this does not mean that the effects can only be defined in terms of a single value of noise exposure. **In some circumstances adverse effects are defined in terms of a combination of more than one factor such as noise exposure, the number of occurrences of the noise in a given time period, the duration of the noise and the time of day the noise occurs**'.*

'The subjective nature of noise means that there is not a simple relationship between noise levels and the impact on those affected. This will depend on how various factors combine in any particular situation'.

These factors include:

*the source and absolute level of the noise together with the time of day it occurs. **Some types and level of noise will cause a greater adverse effect at night than if they occurred during the day – this is because people tend to be more sensitive to noise at night as they are trying to sleep.** The adverse effect can also be greater simply because there is less background noise at night.*

TetraTech have used vehicle data from Mode which has been covered elsewhere in this document.

The Applicant has recorded noise levels from receptors placed along local roads. During the day-time, the traffic noise includes many large vehicles travelling along the A4130/4185 and the A417.

The Applicant then asserts in their latest Noise Assessment that **'Assessments of the increase in road traffic noise as a result of the Proposed Development has shown that noise levels at nearby existing sensitive receptors are predicted to fall within and below the Lowest Observed Adverse Effect Level'**. This is misleading. They have not carried out a discrete overnight analysis of the effect on residents from increased HGV traffic.

If the noise consultant's report contained the same evidence for overnight hours the results would be very different.

Traffic is very light over-night, other than during A34 diversions, and HGV movements are rare. During the night-time hours the normally very low decibel level observed will rocket following the introduction of site-related HGV movements of one every 2 minutes. This result in a jump in decibel readings in night-time hours from around **35db (as per minimum recorded by TetraTech at Location ST3 overnight, Page 18 Noise Assessment, August 2022)** to **78db (Noise generated by a passing HGV)** every few minutes. Both numbers with windows open. That would place the results in the 'Unacceptable Observed Adverse Effect Level' (UOAE) category.

Turning to the Applicant's argument concerning PPG on noise. The Applicants Noise Assessment has not considered the wider guidelines which are applicable to our situation.

The Applicant claims to have satisfied the PPG however they have quoted the requirements and guidance selectively. Many of the guidelines in the PPG have not been considered at all and are shown below with the key parts in bold and underlined.

- it is important to look at noise in the context of the wider characteristics of a development proposal, its likely users and its surroundings, **as these can have an important effect on whether noise is likely.**
- Although the word 'level' is used... this does not mean that the effects can only be defined in terms of a single value of noise exposure. In some circumstances adverse effects are defined in terms of a combination of more than one factor such as noise exposure, **the number of occurrences of the noise in a given time period, the duration of the noise and the time of day the noise occurs.**

RRA comment - The regular and high frequency of noise events overnight is relevant here.

- the source and absolute level of the noise together with the time of day it occurs. Some **types and level of noise will cause a greater adverse effect at night than if they occurred during the day – this is because people tend to be more sensitive to noise at night as they are trying to sleep. The adverse effect can also be greater simply because there is less background noise at night**

RRA comment - Overnight, other than during overnight A34 diversions, our roads are silent. Any HGV movements would increase noise levels considerably to the extent that sleep is compromised even with windows closed.

- for non-continuous sources of noise, **the number of noise events, and the frequency and pattern of occurrence of the noise;**

RRA comment - Each night HGVs would pass homes up to 1 every 2 minutes and against very low background noise, making sleep impossible.

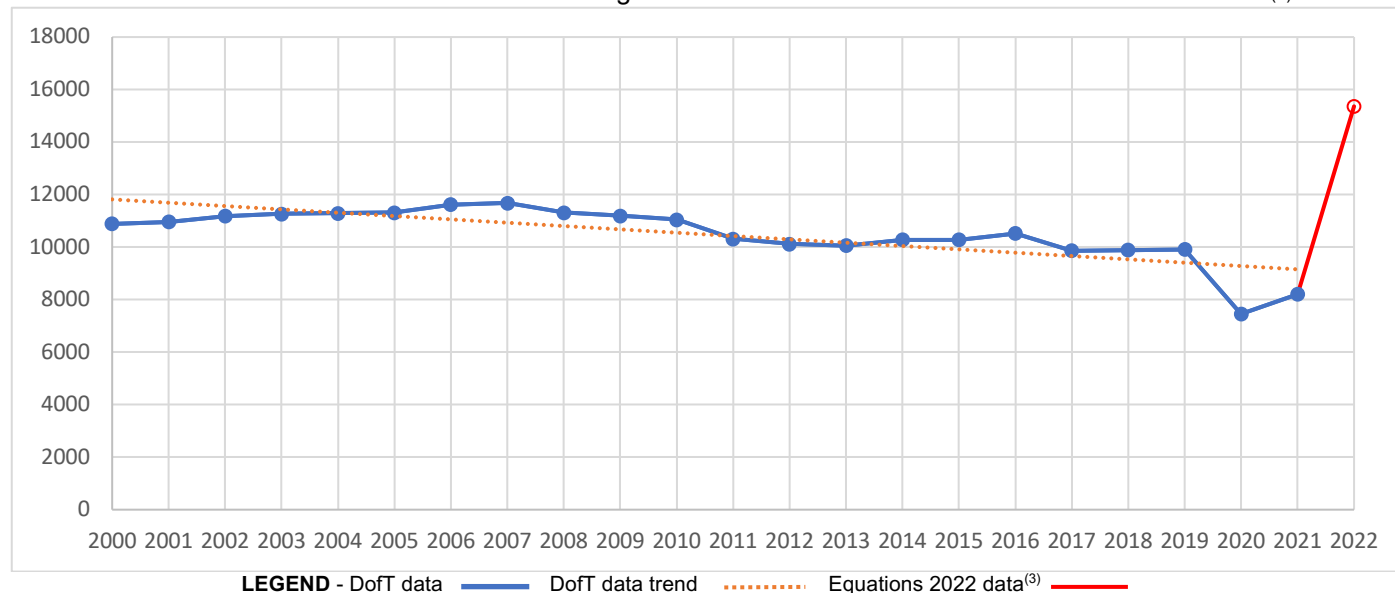
- In cases where existing noise sensitive locations already experience high noise levels, **a development that is expected to cause even a small increase in the overall noise level may result in a significant adverse effect**
- For an area to justify being protected for its tranquillity, it is likely to be relatively undisturbed by noise from human sources that undermine the intrinsic character of the area. **It may, for example, provide a sense of peace and quiet or a positive soundscape where natural sounds such as birdsong or flowing water are more prominent than background noise, e.g. from transport.**

RRA comment - Over-night and in the early hours, natural sounds of owls, foxes, deer, birdsong and farm animals are a regular feature.

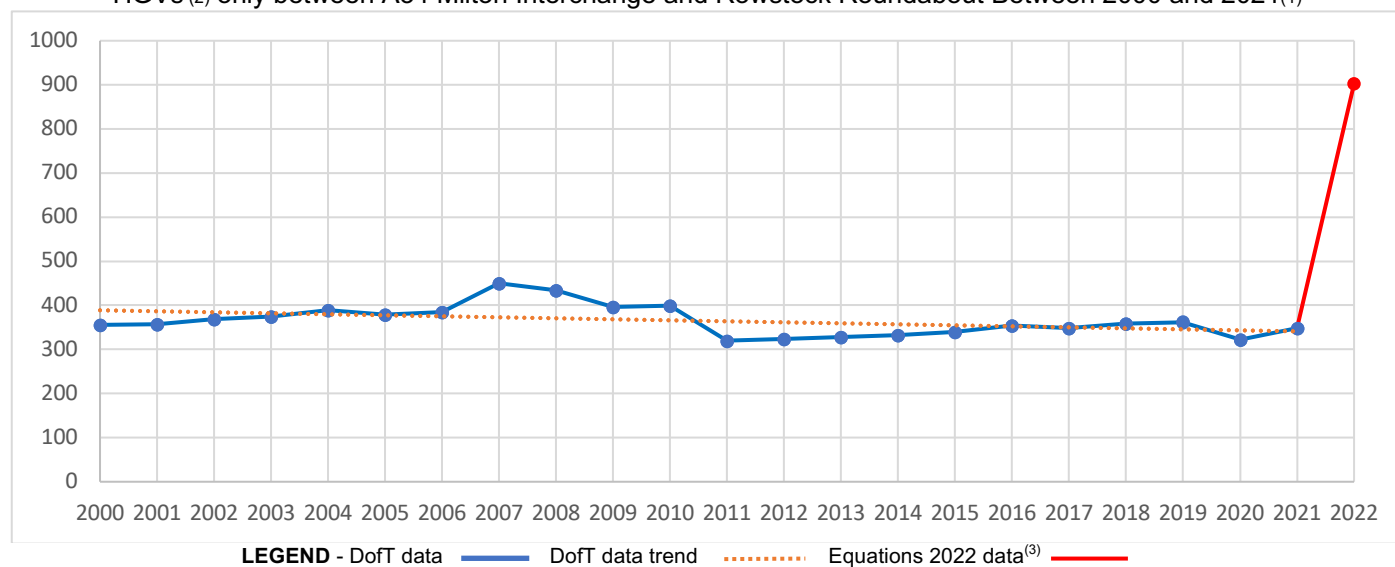
The scenario residents face from the proposal is for an increase between 400-500% in HGV's passing their homes 24 hours a day, The effect of very frequent HGV movements is clearly demonstrated in **Appendix B.**

Appendix E - Department of Transport Road Traffic Statistics 2000-2021

All vehicles between A34 Milton Interchange and Rowstock Roundabout Between 2000 and 2021⁽¹⁾



HGVs ⁽²⁾ only between A34 Milton Interchange and Rowstock Roundabout Between 2000 and 2021⁽¹⁾

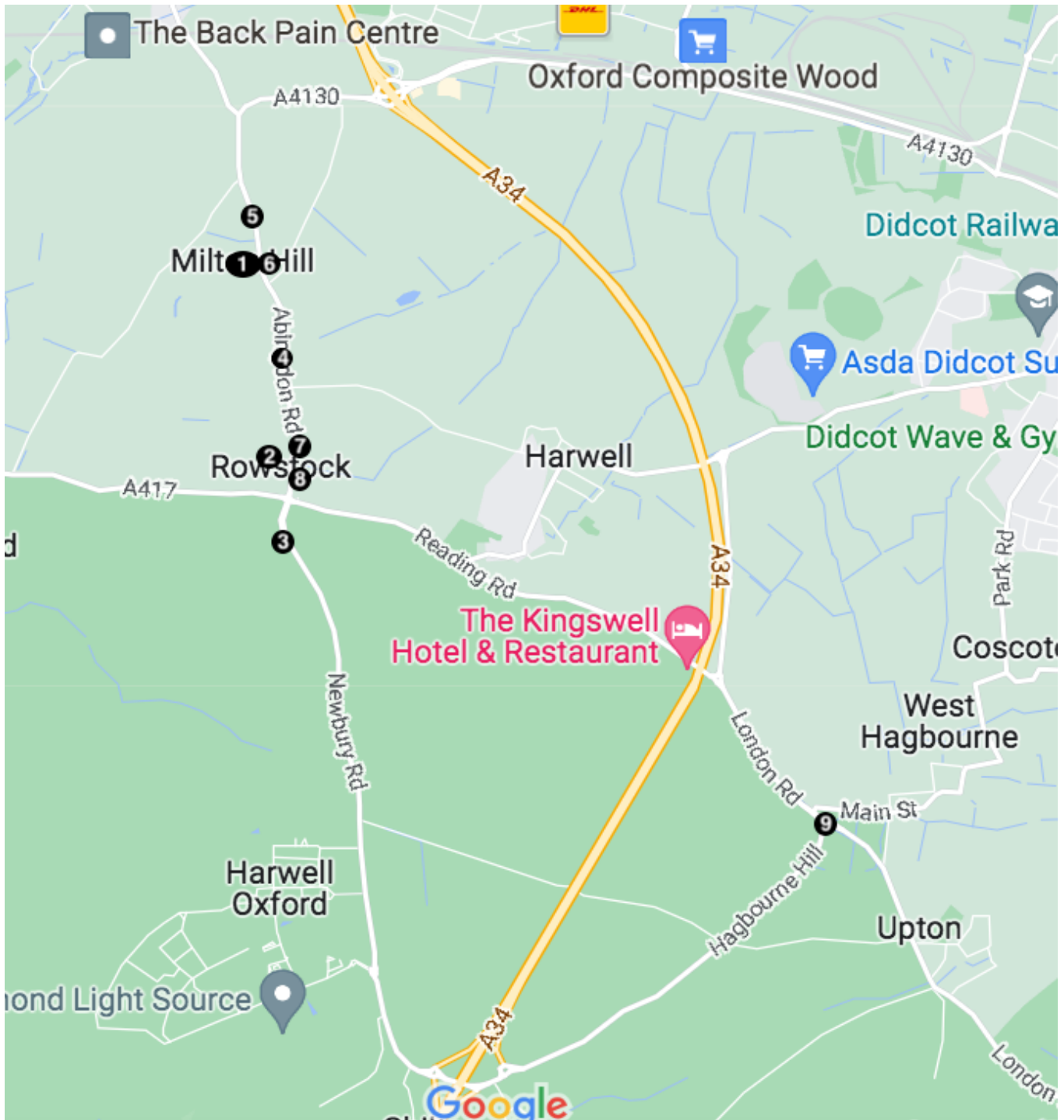


(1) Source: Department of Transport Road Traffic statistics. - Average Annual Daily Flow Count point - 325m south of site entrance.

(2) HGV data Includes 2,3,4 or more rigid axles and 3,4,5,6 articulated axles

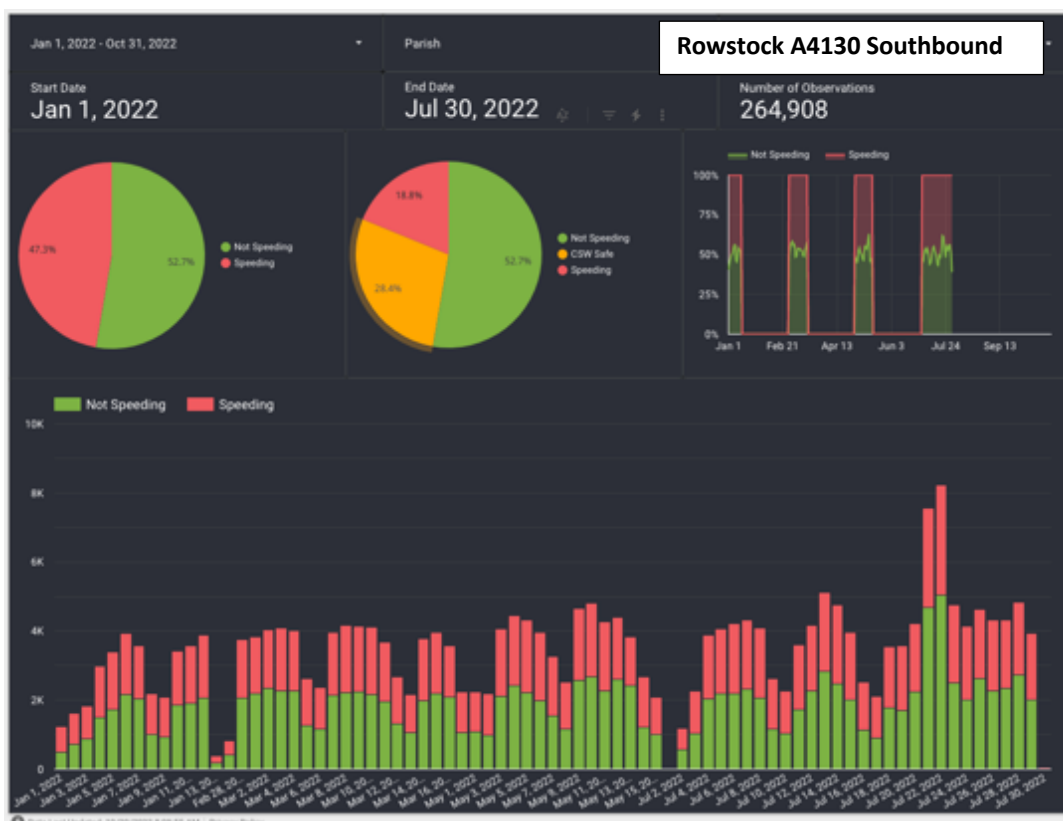
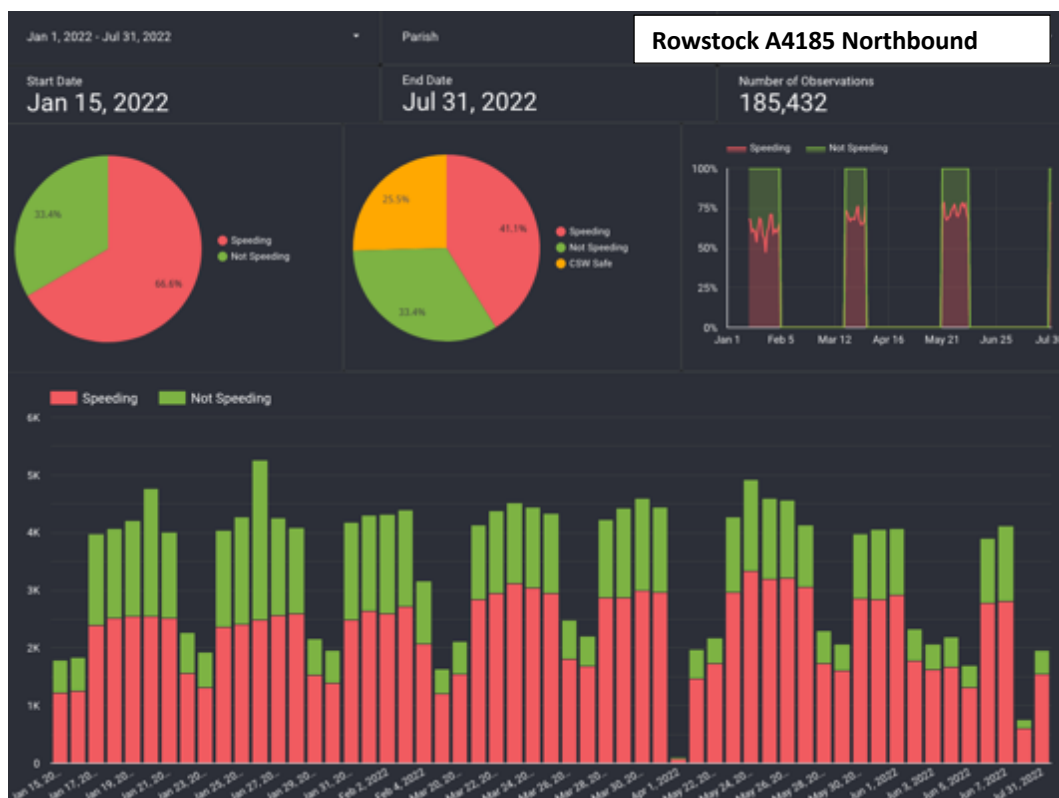
(3) Ref. Highways SoCG paragraph 6.4

Appendix F – RRA Map of locations referred to under Section 5



- 1 SITE
- 2 Rowstock AADT SID Southbound only
- 3 Rowstock AADT SID Northbound only
- 4 DoT AADT both directions
- 5 Equations AADT A4130(between Featherbed Lane and Site) both directions
- 6 Equations AADT A4130(between Milton Hill and site) both directions
- 7 Equation AAWT – between Grove Rd and Reading Rd both directions
- 8 OCC AADT both directions
- 9 Hagbourne Hill/ London Rd

Appendix G – Speed Indicator Device Data



Appendix H– Does the Vale have a job shortage or a shortage of labour?

The Applicant has made much of the opportunity for job creation and economic benefit created by the scheme. In fact, this is the only potential benefit. They claim 600-1200 jobs will be created even though the eventual occupiers aren't known.

In fact, the reality is that job creation is the only reason for approving the application. Nothing else.

The Vale has a very low rate of unemployment. In fact, an employer located very near the site recently said that they have **“massive difficulty in finding staff to fill vacancies”**. The graphics below shows unemployment statistics for Vale of White House May 2021 to May 2022 quoted by Oxfordshire County Council 'Oxfordshire Insight' (rate 2.5%, down 1.17ppt over a year and well below the England average).

Also shown is an often-used definition of 'Full Employment' – 3%, produced by Economics Help and authored by Tejvan Pettinger, Lady Margaret Hall, Oxford University, 2:1. In Philosophy, Politics and Economics'. He contributes articles to the Economic Review and writes regularly on economics.

Our area has Full Employment.

Change in unemployment claimants May-21 to May-22

	May 2021		May 2022		May 2021 to May 2022
	count	rate*	count	rate*	ppt change
Cherwell	3,645	4.7%	2,125	2.8%	-1.98
Oxford	4,645	6.6%	2,860	4.1%	-2.56
South Oxfordshire	2,665	3.7%	1,620	2.3%	-1.47
Vale of White Horse	2,520	3.6%	1,710	2.5%	-1.17
West Oxfordshire	2,185	3.9%	1,310	2.3%	-1.55
Oxfordshire	15,655	4.6%	9,620	2.8%	-1.76
England	2,113,170	7.8%	1,425,955	5.1%	-2.67

Definition of Full Employment

24 April 2021 by Tejvan Pettinger

Readers Question: explain how economists define full employment?

The first definition of full employment would be the situation where everyone willing to work at the going wage rate is able to get a job.

This would imply that unemployment is zero because if you are not willing to work then you should not be counted as unemployed. To be classified as unemployed you would need to be actively seeking work. This does not mean everyone of working age is in employment. Some adults may leave the labour force, for example, women looking after children.

But, in practice, we never see 0% unemployment, and this can make full employment hard to define. Generally, an unemployment rate of 3% or less would be considered to be full employment.

Appendix I – Documents to which RRA will refer

This Statement of Case

Vale of White Horse District Council Local Plan 2031, Part 1 and Part 2

Vale of White Horse District Council SoC, November 2022

Vale of White Horse District Council/Equation Properties Draft Statement of Common Ground, August 2022

OCC Highways/Equation Properties Statement of Common Ground, Undated

OCC Transport for New Development: Transport Assessments and Travel Plans, March 2014

Equation, Market Report, March 2021

Equation Properties SoC, August 2022

East Hendred Parish Council, Objections, 31/10/22

Milton Hill House, SoC, 2/11/22

National Planning Policy Framework Guidance on Noise, 22nd July 2019

TetraTech, Noise Assessment, July 2022, of behalf of Equation Properties

Mode Transport Planning, Transport Assessment Addendum, January 2022 on behalf of Equation Properties

Avison Young, Market Report, March 2021 on behalf of Equation Properties

Harwell Parish Council objection, 14/6/21 and 24/8/21

East Hendred Parish Council objection, 7/6/21, June 2021, 15/12/21 and 15/2/22

Milton Parish Council objection, 30/9/21 and 11/1/22

Steventon Parish Council objection, 7/6/21 and 24/8/21

Chilton Parish Council objection, 13/9/21 and 16/12/21

'The end of the warehouse bubble', Financial Times 7/8/22

'Lab space shortage threatens life science boom in Oxford and Cambridge', Financial Times, 1/8/22

The RRA also intends to call evidence during the inquiry and is currently looking to prepare PoE for filing by 20th December 2022.

ANYTHING ELSE?