OXFORDSHIRE COUNTY COUNCIL

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F.A.O Mark Mathews
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07 Oct 2026

Dear Mark Mathews

Re: White Horse Reservoir Targeted Consultation Sept-Oct 2026

Oxfordshire County Council welcomes the opportunity to respond to the White Horse Reservoir targeted consultation. The Council's detailed officer comments are found at Annex A below.

Whilst the Council welcomes the opportunity to provide comments in respect of the new construction accesses, the Council is concerned with how close this consultation falls to White Horse Reservoir's planned submission date in November.

As you are no doubt aware there are a set of principles established in the case *of R v London Borough of Brent ex parte Gunning* which are known as the Gunning Principles. This case defined four principles against which any consultation has to accord in order to be considered legitimate. These are:

1. proposals are still at a formative stage
2. there is sufficient information to give 'intelligent consideration'
3. there is adequate time for consideration and response
4. 'conscientious consideration' must be given to the consultation responses before a decision is made

The Council considers that due to the lateness of this consultation in relation to White Horse Reservoir's planned submission date this consultation is not compliant with the first principle. Furthermore, due to there only being around 4 weeks between the end of the consultation and submission, there will not be sufficient time for compliance with the fourth principle.

Whilst it can be argued that this consultation has come prior to the submission of the White Horse Reservoir application and therefore the consultation is still at a formative stage, this has to be balanced against the process under which Environmental Statements are drafted and any governance procedures by which they are approved before submission. Environmental Statements take a significant amount of time to draft, and indeed the design for WHR was frozen earlier this year to allow for the Environmental Statement drafting to begin. Equally, any Environmental Statement must go through some sort of governance and approval process before it can be submitted to the Planning Inspectorate.

The Council therefore considers that by the 7th of October the majority of the Environmental Statement will be drafted, and that some time will be required between the end of the consultation and the submission date for internal governance. Given this, it does not appear possible that the scheme will still be in a formative stage by the end of the consultation period as it will not be possible for any significant changes to be made in advance of submission. As such the Council does not consider that this consultation will be in compliance with the first Gunning Principle.

Likewise, given the time constraints outlined above between the end of the consultation and the submission date, the Council does not consider that there is sufficient time for conscientious consideration of any results received prior to submission.

Equally, as is outlined in the detailed officer comments below, insufficient information has been provided to give intelligent consideration of the proposed construction accesses. No general arrangement drawings nor swept path analysis have been provided to assess whether a safe design is achievable at each of the proposed accesses. As such the Council does not consider that the consultation provides sufficient information for intelligent consideration in line with the second Gunning Principle.

In order to ensure compliance with these principles the Council considers that the proposed submission date for White Horse Reservoir should be delayed to ensure that there is still an opportunity for conscientious consideration, and time for the scheme and Environmental Statement to be updated to reflect any changes required. Without this the Council does not believe that this consultation can comply with the Gunning Principles.

Notwithstanding this, in the spirit of constructive engagement, the Council's detailed officer comments are found at Annex 1 below.

Yours sincerely,

[redacted]
Lead Strategic Planner (NSIPs)

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Annex A- Officer Comments

Transport Development Management and Place Planning

Comments on the White Horse Reservoir Access Point Factsheet (September 2026)

Page 1 of the Access Point Factsheet states that:

> Much of the material needed for construction would be brought in by rail, using a new temporary rail siding and materials handling (RSMH) facility linked to the Great Western Main Line at the southern end of the reservoir site. Our current assessment indicates that the use of rail could reduce the total number of heavy goods vehicle (HGV) journeys required during construction by approximately 31% compared with a scenario in which all materials were transported by road. During some periods of construction activity, the reduction in HGV movements could be substantially higher. These reductions are an important reason why the temporary RSMH forms a central part of our construction strategy.

It is welcomed that the temporary RSMH is considered to be a central part of the construction strategy. However, no information has been provided explaining how the use of this facility is to be maximised. In this context, it will need to be demonstrated that various requirements in the National Policy Statement for water resources infrastructure (July 2025) have been satisfied, including (but not limited to):

Paragraph 4.2.3 on assessing air quality impacts, states, “Applicants should seek through the design of any proposed scheme to minimise the emission of air pollutants as far as reasonably practicable…”

Paragraph 4.14.5 on assessing traffic and transport impacts states, “…Appraisals should adopt a vision led approach that seeks to prioritise modal shift to sustainable transport modes and supports transport as a principal mechanism by which to mitigate the impact of the scheme.”

Paragraph 4.14.16 on mitigating traffic and transport impacts states, “Where there is likely to be substantial Heavy Goods Vehicle traffic, an applicant should consider how to:

- control numbers of Heavy Goods Vehicle movements to and from the site in a specified period during construction and operation where possible, and consider the impacts of alternative transport routes
- maximise opportunities for modal interchange to more environmentally sustainable alternatives to minimise the length of journeys and time needed to transport goods and materials on the road”

If the full capacity of the RSMH is not utilised, please explain the following:

- how the emission of air pollutants has been minimised,
- how sustainable transport modes have been prioritised in line with a vision-led approach,
- how opportunities for modal interchange to more environmentally sustainable alternatives have been maximised, and
- how the length of journeys and time needed to transport goods and materials on the road has been minimised.

Page 1 of the factsheet goes on to state that:

> We know that moving equipment, materials and workers to, from and around the site is likely to be one of the major sources of impacts during the construction period. Construction access points could result in:
>
> • increased construction traffic on some local roads
> • temporary changes in traffic conditions close to access locations
> • construction noise associated with vehicle movements and site activities
> • dust generated by vehicle movements and construction works
> • temporary effects on access to land, property and businesses
> • changes to the experience of people using nearby roads, footpaths and public rights of way.
>
> To manage these impacts, we are currently considering a range of potential measures, such as agreeing fixed routes for HGVs, avoiding unsuitable local roads, keeping HGVs away from sensitive areas such as schools, and monitoring noise and air quality throughout construction.

The range of potential measures being considered to manage these significant impacts does not include the provision of a network of haul roads within the site, which could have the potential to substantially reduce the impacts of construction traffic on the local road network (and possibly the strategic road network). Again, OCC question why works such as the East Hanney to Steventon realignment, could not be accessed from Access 1 through the site, rather than using the highway network through Steventon to reach Access 5. Similarly, can it be clarified why some of the enabling works for habitat relocation and creation north of the A417 could not be accessed from just one or two points instead of four.

Nor is there any mention of how construction worker traffic can be minimised through the provision of mobility hubs, use of shuttle bus services, or encouraging (or even requiring) construction workers to use existing public transport services where they are able.

All of these measures will need to have been given due consideration in order for the proposals to demonstrate adequate accordance with the aforementioned requirements of the National Policy Statement for water resources infrastructure (July 2025).

Page 8 of the factsheet also states that:

> Following our public consultation on the wider project, we are carrying out targeted consultation with landowners, occupiers and nearby parties who could be affected by the proposed construction access points. We are seeking information on constraints, operational requirements and potential mitigation measures that should be considered [our emphasis] as the access proposals continue to develop.

But it also states that:

> This consultation focuses on the proposed construction access arrangements and their potential local effects. It is not a consultation on the need for the project, the location of the reservoir, predicted traffic numbers [our emphasis] or other changes to the project proposals since statutory consultation.

Further to this, it acknowledges that work is ongoing relating to the traffic and transport assessment. As such, the factsheet highlights a serious problem in the consultation. If the predicted traffic numbers are not part of this consultation and are subject to further work, consultees are substantially constrained in their ability to meaningfully comment on potential mitigation measures as the impacts for which mitigation might be required are unknown.

This illustrates a fundamental limitation in the utility and meaningfulness of this consultation exercise. This is very disappointing and highlights the need for further consultation when the requisite information is available to enable consultees to provide informed responses.

Comments on the White Horse Reservoir Access Point Mapbook (September 2026)

These comments primarily concern the submitted document '*Developing our plans for access points for the proposed construction of White Horse Reservoir: Mapbook*', dated September 2026. Unless stated otherwise, all page references relate to this document.

OCC Highways Officers visited each proposed access point, and these comments reflect their professional opinion at that time. Given the limited detail in the consultation pack, the location of each access has been inferred from the blue arrows shown in the Map Book. The comments provide a high-level assessment of each access and identify issues that would need to be addressed for OCC to consider it acceptable. They do not prejudice any further comments OCC may make on the DCO submission once more information is available.

Access arrangements are not known at this stage and have not been agreed, as all that is available is a line on a map. All access points would require detailed swept path analysis, to demonstrate that HGVs can manoeuvre safely in any proposed layouts.

It should also be noted that until such a time the transport modelling has been agreed by OCC, the acceptability of these accesses in terms of capacity and highway safety cannot be provided. Additionally, the figures for use of each construction access appear to omit construction worker trips (only including HGV and LGV trips), which is considered to be of fundamental relevance to enabling an understanding of the suitability of these accesses.

All accesses will have to go through a Stage One Road Safety Audit and any issues identified must be resolved to the acceptability of OCC, as the Local Highways Authority.

All accesses must also be designed in accordance with OCC's LTCP Policy 1: Transport User Hierarchy, the requirements of which are in turn supported by the NPPF (August 2026), and the National Policy Statement for water resources infrastructure (July 2025). In particular, it must be demonstrated that all accesses to the site take due consideration of the aforementioned extracts from the National Policy Statement for water resources infrastructure (July 2025), particularly paragraphs 4.2.3, 4.14.5, and 4.14.16. Further to those extracts, paragraphs 4.14.7-4.14.9 are also pertinent to the design of all accesses:

'*4.14.7 The applicant should prepare a construction management plan for construction stages and a travel plan for the operational stage of the infrastructure. Both should include demand management and monitoring measures to mitigate transport impacts. The applicant should also provide details of proposed measures to improve access by walking, wheeling, cycling, public and shared transport to:*

- *reduce the need for parking associated with the proposal*
- *contribute to decarbonisation of the transport network*
- *reduce the need to travel*

• secure behavioural change and modal shift through an offer of genuine modal choice and to mitigate transport impacts

4.14.8. The assessment should also consider any possible disruption to services and infrastructure (such as road, rail and airports).

4.14.9. If additional transport infrastructure is needed or proposed, it should always include good quality walking, wheeling and cycle routes, and associated facilities (changing and storage etc) needed to enhance active transport provision.'

As such, all designs must ensure that they not only provide for NMUs as a priority but also ensure that where existing provision for NMUs is disrupted by the proposed accesses that these users are not unduly disadvantaged and any such impacts are suitably mitigated.

Access A1

This will be the sole permanent construction access out of the 17 identified and will become the main operational access once construction is complete. It is expected this access will be utilised for construction starting in 2027 all the way through to 2042, with the peak movements expected to be in 2034, when 60 HGV movements and 41 LGV movements per hour will be generated.

Page 2 states that the traffic figures are indicative and may change following discussions with landowners about early works. OCC will therefore require sensitivity testing in the transport modelling, as delays to the early works could increase construction movements in 2030, the second-highest peak after 2034.

OCC are yet to view a detailed general arrangement plan of the main access, which would allow more detailed feedback to be provided. Plan J696-ARB-XXXX-3ZZZ-DR-TH-100000 (A415/SESRO Main Access - Highway Keyplan) and J696-ARB-XXXX-3ZZZ-DR-TH-100001 (A415/SESRO Main Access - Highway Layout - Sheet 1 of 7) were submitted in March 26, however, these have not been agreed with OCC, as the transport modelling is yet to be agreed.

Locating the main construction access here is logical because its proximity to the A34 provides the most direct route for construction vehicles travelling north and south. As noted in our PTAR comments, the access arrangement required for construction traffic may not be suitable for operational use or align with the aims and objectives of the LTCP. TW should continue to engage with OCC as the detailed design develops to determine whether the access arrangements will need to be amended after construction.

Provision for active travel users must be demonstrated in accordance with LTN 1/20. The current speed limit on this section of the A415 is 50 mph. Speed surveys should be undertaken and assessed alongside relevant guidance and standards to confirm the appropriate highway geometry. A reduction to 40 mph is understood to be under consideration; if pursued, measures will be needed to secure compliance, particularly on the straight section between the edge of Marcham village and the new access.

The interaction between the main access and Faringdon Road, which also provides a northbound route to Access 13, must be assessed, particularly because Access 17 is

expected to reach its construction traffic peak in 2030, when Access 1 will experience its second-highest peak.

The Dalton Barracks allocation (both in the adopted Vale of White Horse Local Plan 2031 Part Two and the emerging South Oxfordshire and Vale of White Horse Joint Local Plan 2041, which is currently at examination) must also be considered, as it is expected that mitigation works at the Faringdon Road/A415 junction will be required. Coordination between the two schemes will therefore be important.

Access A2

This temporary access is intended for construction of the rail sidings and handling facility (RSHF) and other works, with peak HGV and LGV movements of 51 and 6, respectively, per hour, in 2031.

The visibility along this stretch of the A338 is good, due to the straight alignment and minimal gradient.

The presence of a ditch and low-lying ground to the east of the A338 here, will require consideration of the engineering requirements to raise this access adequately and bridge the ditch.

There is also a historic milestone in the verge, as shown in the photo below, which will require adequate mitigation to protect it from construction traffic impacts.



Figure 1

Mitigation may be needed to manage conflicts between slow-moving HGVs leaving the site or waiting to turn and faster-approaching vehicles, thereby reducing the risk of rear-end collisions.

If the RSHF does not proceed and raw materials cannot be transported by rail (noting that Network Rail has not yet committed to a timescale for the connection of the RSHF to the Great Western Main Line), OCC requires clarification on whether this access would still be needed.

Access A4

This temporary access is intended for works associated with the eastern wetlands, with peak HGV and LGV movements of 6 and 7, respectively, per hour, between the end of 2031 and mid-2032.

There is currently an access onto the A338 in this location (Figure 2), which serves as access to a flight school, a farm and a solar farm. It is also PRoW bridleway192/2/10, which runs on an east west axis, connecting into the wider PRoW network, eventually reaching Drayton to the east.

Consideration will have to be given to this PRoW during construction and how construction impacts will be mitigated before construction commences.

Visibility appears good in this location, again, due to the reasonably straight alignment and flat gradient.



Figure 2

The access should be formalised with a kerbed bellmouth and suitably metalled surface to prevent mud and debris being tracked onto the A338. The apron near the A338 junction may also need to be lengthened so construction vehicles can manoeuvre safely while waiting for an approaching HGV or LGV.

Mitigation may be needed to manage conflicts between slow-moving HGVs leaving the site or waiting to turn and faster-approaching vehicles, thereby reducing the risk of rear-end collisions.

OCC note the presence of a ditch running parallel to the eastern side of the A338, which may require further consideration when formalising the bellmouth.

Access A5

Access A5 is located on Hanney Road, 400m west of Steventon. This temporary access will support works at the eastern end of the East Hanney–Steventon road diversion, with peak hourly movements of 16 HGVs and 16 LGVs (32 in total) in the second half of 2031. From approximately 2030 to mid-2034, movements are expected to remain steady at around half this level.

There is currently, an access to an industrial unit in this location, although the access is not formalised, so will require acceptable upgrading for use by HGV traffic.

Visibility is good, given the straight and flat alignment of the Hanney Road in this location, as shown in Figures 3 and 4 below.



Figure 3



Figure 4

Vehicle speeds are notably high along this road, with vehicles travelling above the posted 50mph speed limit. Therefore, speed surveys will be required, and mitigation may be needed to manage conflicts between slow-moving HGVs leaving the site or waiting to turn and faster-approaching vehicles, thereby reducing the risk of rear-end collisions.

Access A6

This temporary access is required to set up and access the construction compound needed to create the intake-outfall structure on the River Thames riverbank, and associated work. It is expected to have a significant spike in peak movements during the late summer of 2033, with 24 HGV movements per hour and 6 LGV movements per hour. Between the end of 2033 and 2038, movement levels remain consistent at approximately a third of the peak levels.

TW intend to utilise Stonehill Lane to travel east, before the lane bend round to the south, before heading east again towards the River Thames. At the junction with Peep-O-Day Lane, they intend to route northwards, accessing their construction works area adjacent to the Sewage Treatment Works.

Stonehill Lane is made up of several connecting PRoW footpaths (192/8/10, 192/8/20, 192/8/30, 192/26/10, 192/26/20 and 196/22/10) and whilst the lane is currently used by HGVs to access Oday Quarry, there will be an intensification along this PRoW, which will result in increased conflict between active travel users and construction traffic. Consideration will have to be given to mitigation measures that can be put in place to reduce the safety risk posed to pedestrians, especially on the sharp 90 degrees bend.

Further east, the indicative route shown on page 7 joins Sustrans Route 5, locally known as Peep-O-Day Lane. This important, largely traffic-free cycle route links Sutton Courtenay with Abingdon (not ‘Abington’ as incorrectly shown on the map, see also A7

and A16) and is widely used for commuting and leisure trips from the Didcot area towards Abingdon and Oxford. OCC does not support construction traffic using the route because of the significant impact on cyclists (and other active travel users), particularly where the proposed access joins Peep-O-Day Lane and visibility between users is limited.

This serious concern also applies to the remainder of the route of Stonehill Lane connecting to the B4017, which is a bridleway. It will need to be demonstrated how the route will be able to safely accommodate the users of the bridleway whilst also accommodating the substantial number of the proposed HGVs, LGVs, and construction workers who would be using this route. This is expected to be a significant challenge given the narrow width of the lane.

Finally, it will need to be demonstrated whether the construction and condition of the surfacing of the route is able to accommodate the impact of all construction vehicles.

At the Drayton Road access, a well-used shared-use path crosses the frontage. Increased use of the access would heighten the risk of conflict between pedestrians, wheelers, cyclists and HGVs. Appropriate mitigation will therefore be required, in accordance with LTN 1/20 and Policy 1 of the LTCP, to give these users priority across the junction.

As can be seen in Figures 5 and 6, below, visibility at the junction with Drayton Road, seems appropriate.



Figure 5



Figure 6

Access 7

This temporary access is required to establish a berm on the east bank of the River Thames. At its expected peak in 2033, 21 HGV movements per hour and 4 LGV movements per hour are predicted.

Burycroft is approximately 4.95m wide, with the bellmouth increasing to a width of 18m. The junction, however, is not a perpendicular junction with the A415 (see Figure 7), therefore, the bellmouth radii would require upgrading for HGV vehicles.



Figure 7

HGVs would need to approach from the east along the A415, avoiding a westbound route through Abingdon town centre, before turning left into Burycroft. Given the junction geometry, vehicles are likely to overrun the nearside kerb (shown in Figure 8) and encroach into the opposing carriageway. Forward visibility is insufficient for these manoeuvres to be undertaken safely, creating a risk of conflict with other vehicles and cyclists.



Figure 8

A mature tree stands at the proposed Burycroft access point, as shown on the left of Figure 9. Its condition and significance have not yet been established and will require appropriate consideration.

For construction egressing from the Burycroft access and onto the A415, the required visibility splays are likely to be achievable for the current 40mph speed limit of both roads, as shown in Figures 10 and 11, below, as both are located on the outside of a bend.



Figure 9



Figure 10



Figure 11

It should be noted that this general location is popular with walkers utilising the Thames Path National Trail, which can be reached by PRoW 183/13/10 from Burycroft. This

connection would sit adjacent to any construction access, and the appropriate mitigation would be required to ensure the safety of all non-motorised users (NMUs), in accordance with Policy 1 of the LTCP.

Access A8

This temporary access is required to access land to carry out habitat creation, species relocation works and other early environmental works. This access point was not visited; however, a desktop assessment has been undertaken, and highway officers have good local knowledge of this location.

This access is expected to operate from 2027 until early 2031, with use remaining relatively consistent at approximately 300 movements per month. Peak activity is anticipated at the beginning and end of this period, when up to eight HGV and three LGV movements per hour are expected.

There is no suitable route for construction traffic to reach this location without passing through Garford, East or West Hanney, or Southmoor. Each option follows narrow rural roads with pinch points and other constraints and requires difficult junction manoeuvres.

The suitability of these access routes must also take account of Ock Bridge and Gallows Bridge, if routing from the north or south.

Visibility at the proposed site access is good because of the road's straight alignment. However, the ditch along the carriageway edge will need to be culverted.

Access A9

This temporary access is required to reach land to carry out habitat creation, species relocation works and other early environmental works. Works here are anticipated to operate from 2027 through to 2032, with the peak movements of 1 HGV per hour and 6 LGVs per hour, occurring during 2029 and 2030.

Ardington Lane has a downhill gradient to consider also (see Figure 12), which will have to factored into adequate mitigation measures.



Figure 12

Although the number of movements is relatively low, Ardington Lane is extremely narrow and includes two sharp 90-degree bends. The first has open verges and good forward visibility, while the second is enclosed and has very poor visibility (see Figures 13 and 14). A series of passing bays is likely to be required, with adequate intervisibility between them, to allow any construction traffic to safely pass each other.

Although the route is lightly trafficked, Ardington Lane forms part of bridleways 108/3/10, 108/3/20 and 108/3/30, so appropriate mitigation and diversion arrangements will be required.



Figure 13



Figure 14

The effect of increased traffic at the Ardington Lane/A417 crossroads must be assessed. The opposite arm provides access from Ardington village and, despite the relatively small population served by both junction arms, appears well used: officers observed five vehicle movements during a five-minute site visit. Consideration must therefore be given to how the two accesses would operate together. Eastbound and westbound bus stops immediately east of the junction are also used by Ardington residents.

Visibility to the east appears acceptable, but visibility to the west requires further investigation because the existing tree line restricts sightlines, as shown in Figure 15. The Ardington Lane junction also lies immediately east of a long, tree-covered section of the A417, where changing light conditions may make it difficult for westbound drivers to see vehicles waiting to turn or emerging from the junction.



Figure 15

Access A10

This temporary access from the A417 via Woods Farm Road (The Map book, refers to this access by the wrong name, stating ‘Lane’ and must be amended) would support habitat creation, species relocation and other early environmental works. Activity is expected to begin in 2027 and increase to a peak in 2030, when one HGV and six LGV movements per hour are forecast. Construction traffic is then expected to decline in 2031 and cease by the end of 2032.

Woods Farm Road is an unmetalled track, as shown in Figure 16, below, and the junction with the A417 would require formalising into a suitable kerbed bellmouth, capable of taking construction vehicles.



Figure 16

We will require an adequate waiting apron to allow for any HGVs to safely wait off the A417, for any oncoming vehicles, so as not to obstruct vehicle flow on the A417.

Woods Farm Road lies immediately east of the transition from the 40-mph to the 30-mph speed limit. Consideration should therefore be given to extending the 30-mph limit to accommodate increased use of the junction. Speeds are generally observed on this section because eastbound vehicles approach uphill, while westbound traffic is monitored by a speed camera at the bottom of the dip west of Woods Farm Road.

Visibility appears acceptable for the speed of the road, as shown in Figures 17 and 18.



Figure 17



Figure 18

Highways officers observed an HGV leaving Woods Farm Road and turning left onto the A417, with its wheels and body encroaching into the opposing lane, as indicated by the wheel marks in Figure 19. Given the heavy traffic on the A417, particularly at peak times, suitable mitigation will be required to manage these HGV movements safely.



Figure 19

Access A11

This temporary access is required to reach land to carry out habitat creation, species relocation works and other early environmental works. It has a similar activity profile to Access 10, with movements expected to begin in 2027 and increase to a peak in 2030, when one HGV and six LGV movements per hour are forecast. Construction traffic is then expected to decline in 2031 and cease by the end of 2032.

OCC has significant highway safety concerns about using this access for construction traffic. It is located at the apex of a 90-degree bend midway along Featherbed Lane, which carries high peak-hour traffic as a shortcut between the A417 and A4130.

Featherbed Lane is subject to the national speed limit, and vehicle speeds are often high. The northern section is wider and has centre-line markings, but the road narrows towards the A417, where these markings are absent.

The two 90-degree bends in the central section of Featherbed Lane require vehicles to slow sharply. However, many drivers still approach at unsuitable speeds and may encroach into the opposing lane. Forward visibility around both bends is very limited, and Access 11 is proposed at the western bend. As Figure 20 shows, drivers turning right into the access would have restricted visibility, creating a significant risk of head-on collisions.



Figure 20

Figure 21, looking north towards the proposed access, further illustrates the limited visibility of vehicles waiting to turn right into the site.



Figure 21

A construction access is unlikely to be acceptable at this location without substantial safety mitigation. However, OCC does not support extensive upgrades that could encourage greater use of the route by drivers.

The existing Featherbed Lane access, shown in Figure 22, would need a kerbed, fully surfaced bellmouth and an apron large enough for HGVs to wait clear of the highway, avoiding traffic obstruction and reducing the risk of rear-end collisions.



Figure 22

Access 12

This temporary access is required to reach land to carry out habitat creation, species relocation works and other early environmental works. It has a similar activity profile to Access 10 and 11, with movements expected to begin in 2027 and increase to a peak in 2030, when one HGV and six LGV movements per hour are forecast. Construction traffic is then expected to decline in 2031 and cease by the end of 2032.

As with Access 11, OCC has concerns about the suitability of using Grove Park Drive to reach this access. Like much of Featherbed Lane, Grove Park Drive is narrow and heavily rutted along both edges (see Figure 23), reflecting vehicles encroaching onto the verges when passing larger vehicles or travelling at speed.



Figure 23

Grove Park Drive is subject to the national speed limit and observed vehicle speeds are often high. It is also frequently used as a shortcut between the A417 and A338, avoiding Wantage, particularly during periods of congestion and delay in the town.

Given the southbound downhill gradient from the A417 and several significant bends (see Figure 24), including one immediately north of the proposed access, Grove Park Drive is unsuitable for increased HGV movements on highway safety grounds.



Figure 24

An existing unmetalled track at the proposed access, shown in Figure 25, would need to be upgraded with a kerbed bellmouth suitable for safe HGV movements. Adequate waiting aprons would also be required so vehicles can wait clear of Grove Park Drive, reducing the risk of rear-end collisions.



Figure 25

Visibility looking west from the access appears acceptable. However, visibility looking south from the access and for vehicles approaching from the south requires further assessment.



Figure 26 – looking south from the access.



Figure 27 – looking towards the access with a limited view around the left-hand bend.

On the bend shown in Figure 27, the road has an adverse camber, creating an additional safety concern if construction traffic increases.

Access 13

This temporary access to set up and access a construction compound for the A34 Marcham Interchange works (west) and A415 Marcham Road roundabout, has one of the shortest anticipated usage periods of approximately one year, from the end of 2029 to the end of 2030. Peak construction movements are predicted to total 5 HGV movements per hour and 3 LGV movements per hour.

This site was not visited by Highways officers; however, a desktop study has been undertaken. The Faringdon Road is relatively straight in its alignment at the proposed access point and therefore acceptable visibility is likely to be achieved here.

There looks to be a ditch running alongside the eastern side of the carriageway, which will require adequate mitigation when formalising a kerbed bellmouth access that allows safe manoeuvring of HGV traffic.

Further to the south, at the junction of Faringdon Road with the A415, there is an existing ghosted right-turn arrangement. Given the Faringdon Road connects north-westwards to firstly the A338 and then onwards to the A420, it is often used as a rat-running route for drivers looking to avoid the sensitive Frilford junction. Therefore, the operation of the Faringdon Road/A415 junction can be severely delayed in the peak hours.

Extra construction traffic will exacerbate this delay and could lead to an increased safety risk to vehicles routing through this part of the network, as drivers look for more limited opportunities to make manoeuvres. Coupled with this, this junction and access will also have to consider the allocated housing site at Dalton Barracks, as they are required to mitigate their impact upon the Faringdon Road and the junction with the A415.

Access A14

This temporary access to set up and access a construction compound for the A34 Marcham Interchange works (east), again, has one of the shortest anticipated usage periods of approximately one year, from the early part of 2030 to the middle of 2031. Peak construction movements are predicted to total 4 HGV movements per hour and 3 LGV movements per hour.

This site was not visited by Highways officers; however, a desktop study has been undertaken.

From page 15, it appears that this access is to be taken from the access road that serves the Tesco Extra Superstore in Abingdon. Figure 28 indicates where TW anticipate punching through the existing vegetation to gain access.



Figure 28

This access road is a private road and has 5mph roundels on the carriageway, with a couple of small speed ramps, to encourage low speeds. It is a route used already by delivery HGVs servicing the superstore, however, further mitigation may be necessary if the route is intensified with HGV traffic.

The approach route along Marcham Road from the A34 is subject to severe delay in the peak hours and further construction traffic will add to this congestion, impacting on public transport services in and out of Abingdon.

The pedestrian crossing on the connection between Chaunterell Way and Tescos will require upgrading, to ensure pedestrians have the priority over all traffic, in accordance with LTCP Policy 1 and LTN 1/20, especially if the volume of movements is going to increase.

Access 15

The construction period at this access is anticipated to start in 2028 and last for approximately 7.5 years to 2036. It is required for temporary access to set up and access a construction compound for works at the western end of the East Hanney to Steventon road realignment, and undertake works including a trial embankment, ecology works, archaeological investigations, utility diversion and demolition works. During peak construction, it is predicted that there will be 14 HGV movements per hour and 11 LGV movements per hour.

It is anticipated that access will be required up to where PRoW bridleways 366/4/10 and 20 intercept the Hanney Road. These footpaths will be subject to stopping up and formal re-routing arrangements undertaken via the Development Consent Order. It should be noted that finalised PRoW diversions have yet to be agreed by the Council.

The Hanney Road itself is capable of taking HGV traffic, as it currently houses numerous farms and light industrial units, as well as being on public transport routes. Adequate mitigation will be required to any further site access and TW will be required to liaise with OCC Highways officers to establish their requirements.

The junction of Steventon Road and the A338 currently operates with a minimal accident record (history of the last 3 years), with accidents limited to vehicles failing to stop before colliding with vehicles waiting to turn. The operation of this junction will be considered further once the transport modelling can be scrutinised.

Access A16

This temporary access is required to set up and access the construction compound for works associated with the intermediate shaft for the river tunnel and is anticipated to be required over a period of just over two years from, terminating early 2034. Peak movements are expected at the start of 2032, with 12 HGV movements per hour and 3 LGV movements per hour. There is another secondary peak of movements at the end of 2033.



Figure 29

As shown in Figure 29 above, this access is proposed to utilise the Restricted Byway 192/7/10, which routes northwards to New Cut Mill. This track links up to quite an extensive network of PRoW in this area and due consideration will be required when establishing appropriate diversions and realignments of these routes, subject to the Development Consent Order. It should be noted that finalised PRoW diversions have yet to be agreed by the Council.

It will need to be demonstrated how the route will be able to safely accommodate the users of the PRoW whilst also accommodating the substantial number of the proposed HGVs, LGVs, and construction workers who would be using this route. This is expected to be a significant challenge given the apparent narrowness of the route.

Finally, it will need to be demonstrated whether the construction and condition of the surfacing of the route is able to accommodate the impact of all construction vehicles.

It is not known the exact width of this restricted byway, but TW will be required to ensure that HGVs can safely pass each other along the length of the route, as well as formalising the junction into a kerbed bellmouth. This may be achieved with a series of passing bays along the route that are intervisible, however, OCC cannot confirm the acceptability of this without seeing further details. A metalled apron will also be required, to allow HGVs to wait for oncoming vehicles off the highway, to ensure that traffic flow is not inhibited along the Drayton Road, or rear shunt collisions occur.

This restricted byway meets the Drayton Road just inside the 30mph speed limit, as can be seen in Figure 30, below. The speed then rises to 40mph, until the edge of Abingdon further to the north. The visibility to the north will need some attention, as there is established hedgerow that would need cutting back.



Figure 30

Visibility to the south must also be further considered, as whilst it might be acceptable for cars, the height of the existing tree crowns, shown in Figure 31, below, would obstruct an HGV drivers' view.



Figure 31

There is also an existing informal crossing point at the access, which allows pedestrians to safely cross onto the existing shared path facility on the eastern side of the Drayton Road. Any access arrangement here would have to prioritise active travel movements in accordance with LTN 1/20, to ensure users can still reach this shared use path, as it provides an important link into Abingdon.

As with Access A6, construction vehicles would need to travel either through Abingdon or north through Steventon and Drayton, neither of which OCC considers preferable. The access geometry is also likely to prevent larger vehicles entering from the north because the restricted byway doubles back on itself. For vehicles to be able to make this right turn in, the radii of the junction would have to be considerable, which would significantly over-engineer this access. Therefore, it is more likely that there may be a left-in and left-out type arrangement, however, without seeing further details of how such an arrangement would work, OCC cannot comment further on this.

Any localised widening or realignment of the carriageway would have to first prioritise the active travel routes in this location and consider the junction of Sutton Wick Lane opposite.

Access A17

This site was not visited by Highways officers; however, a desktop study has been undertaken.

This access would be a temporary access to set up and reach a compound for works to the railway (via Network Rail land). Construction traffic movements here are expected to start in 2029 and remain consistent at 3 HGV movements per hour and 3 LGV movements per hour until 2032.

There is a current access from the A417 in this location, which doubles back on itself, as can be seen in Figure 32, below. This has a very wide bellmouth and would require upgrading given there would be an intensification of the access.



Figure 32

The visibility to the north is inhibited by the railway overbridge, which OCC do not find acceptable, as vehicles coming over the bridge will not see vehicles turning out of the access. Equally, vehicles risk colliding with slower moving HGVs waiting or turning at the access. A ghosted right facility may be required in this location, however, the proximity to the overbridge may present engineering challenges with this type of arrangement.

Visibility to the south is shown in Figure 33 and this would also require significant hedge line to be cut back.



Figure 33

Accesses A20

This site was not visited by Highways officers; however, a desktop study has been undertaken. It should also be noted that the map on page 20 has been labelled incorrectly, where the A417 should be the A338.

These temporary accesses are to set up and access a compound(s) for works to the railway. Two accesses have been indicated on page 20, one either side of the railway overbridge. Therefore, it is unsure if each of these is anticipated to have the same movement profile indicated in the Map Book. Operations here are expected to commence in 2029 and complete halfway through 2032, with consistent movements of 7 HGV movements per hour and 9 LGV movements per hour. OCC question whether these are intended to be split over each of the accesses, or if this number of movements is expected at each access.

As with Access 17, OCC have significant concerns about having an access or accesses for construction traffic so close to the overbridge (as illustrated in Figures 34 and 35). The gradients mean that the junction visibilities are not acceptable in the bridge direction and the risk of collisions in high, from slow and turning HGVs manoeuvring in and out of the access points.



Figure 34



Figure 35

Although accesses already exist at these locations, their current layouts would be unacceptable under the increased construction traffic. The arrangements will require careful design and are likely to need a temporary ghost-island right-turn facility. Retaining the existing layouts would present an unacceptable risk to highway safety and cause delays on this important bus route.

Network Management

From a Network Management perspective, the Council needs to ensure that the drafting of the Development Consent Order does not prevent OCC as the highway authority from undertaking its duty to safely manage the local highway network. It is known from other DCOs progressing within the County that applicants often seek to disapply areas of the New Roads and Street Works Act 1991 and local permit schemes. However, these are essential tools which OCC needs to manage the network. Given this the Council will require close engagement with the applicant on the appropriate drafting of the DCO to ensure that the works needed to deliver the proposed accesses can be appropriately managed to avoid significant disruption on the network.