

I am the District Councillor for Hendreds Ward in the Vale of White Horse which is immediately adjacent to the west of this scheme.

As such I am submitting these comments to raise concerns about the traffic and congestion impacts that will likely arise from the HIF1 scheme in neighbouring areas and the inadequacy of the Environmental Statement in addressing this. I will also be highlighting my concerns at the alternatives considered by the Environmental Statement and its very limited consideration of Climate Change impacts.

These flaws in the Environmental Statement are so fundamental as to leave it invalid, so that it would be unlawful and open to challenge to grant planning permission for this application.

The Environmental Statement (or ES) does not consider at all that the new road might lead to an increase in traffic levels due to induced demand, despite this being a widely recognised effect of building new road capacity. Induced demand arises because the route is easier and quicker to use, so more trips are made. Oxfordshire County Council's Local Transport and Connectivity Plan says *"we have found that road schemes often generate new demand and quickly reach capacity again. It is therefore not a sustainable long term solution for Oxfordshire's transport network."* The LTCP is a material consideration for this planning application.

Given that induced demand is so well established a phenomenon in road-building, by ignoring this altogether, without any explanation, the ES traffic and climate emission assessments become implausible.

Roads across my ward are already regularly congested during peak times. Induced traffic growth from HIF1 will put more strain on these but the ES doesn't look at this.

The ES Transport Chapter does model impacts on Milton Interchange and the A34 of building HIF1. The impact on the A34 is described as positive because the new road will take more vehicles away from Milton Interchange more quickly. It doesn't mention the impact of the traffic in the other direction, presumably also more vehicles that will be arriving more quickly at the junction. This half picture is not believable. There is a statement in the ES Chapter 16 Transport - 16.4.13 that states that A34 on-slips have been categorised as having a very low sensitivity as the traffic is not running into a junction and is merging onto free-flowing traffic. That is simply not true at rush hour on a typical weekday morning when the A34 is itself congested in the vicinity of Milton Interchange due to the volume of on traffic trying to join.

The ES shows the traffic model area as covering roads west of the scheme as far as East Hendred. However it then fails to discuss at all the predicted impacts. East Hendred Parish Council repeatedly requested modelling data from Oxfordshire County Council for this area, but they have never had a response.

So what other alternatives were considered in the Environmental Impact Assessment described in the ES? Well, options apart from new roads, or the "do nothing" scenario were discarded early on in a "first sift" that is not actually detailed in the ES. Statements in the ES show that years before the plans were drawn up, road-building was the assumed outcome.

The ES also fails in its consideration of climate change impacts. The bulk of construction emissions are blithely noted as "embedded". It makes it sound as though they are safely locked away, but those emissions do all happen in the manufacture of the materials used to build the road. The materials are embedded in the road, the emissions are out in the atmosphere.

Operational carbon emissions are apparently cut by HIF1, by reducing congestion elsewhere in the road network, but of course that only works if there is no induced traffic demand, and there is no

evidence presented here as to why that would in fact be true.

It is the case that the Local Plans for Vale of White Horse and South Oxfordshire district councils offer support for this road project. But both of those plans also have policies that oppose the scheme in its present form and both councils have responded to the most recent planning consultation with a number of strong concerns with the scheme as it stands. Within both districts, the Didcot HIF1 area is the best location to put new housing that need not be car dependent as it is the area served by the railway. Despite that, there has been no consideration of non-road infrastructure in the Environmental Statement to enable new housing and employment site development.

The most recent report of the Climate Change Committee "Progress in Reducing Emissions 2023 report to Parliament" made a recommendation: R2023-148 - Conduct a systematic review of current and future road-building projects to assess their consistency with the Government's environmental goals. This should ensure that decisions do not lock in unsustainable levels of traffic growth and develop conditions (which can be included in the Roads Investment Strategy 3 process and beyond) that permit schemes to be taken forward only if they meaningfully support cost-effective delivery of Net Zero and climate adaptation.

Since then the requirement for all new cars to be electric has been delayed by 5 years by the Government, which means that traffic reduction will now need to do more work towards achieving the UK's legally binding carbon emissions reductions than when the Climate Change Committee made this recommendation.

I am very concerned that the HIF1 road project is an old, out-dated plan, that creates serious issues for emissions reductions targets and the LTCP that targets significant reductions in private car road trips. In ignoring induced traffic and ignoring key locations adjacent to the route where traffic congestion is already a problem (Abingdon, Didcot, the A34) the traffic modelling is not believable. I expect that delivery of the HIF1 would exacerbate congestion woes in my ward.

I would further question why this application is subject to an inquiry as it was rejected by Oxfordshire County Council's planning and regulation committee on 18th July 2023 following 2 days of evidence and deliberation. The decision was clearly reached by a substantial majority of the committee as can be seen in the recording of the meeting and in the minutes. To override that decision feels anti-democratic and most unusual.