

**From:** [REDACTED]  
**Sent:** 04 October 2023 07:03  
**To:** Skinner, Helen  
**Cc:** Palmer, Leanne; Ng Chien Xen; 'Gregory O'Broin'  
**Subject:** FW: APP/U3100/V/23/3326625. (R3.0138/21 - HIF1 Call-in)

Dear Helen

I am writing on behalf of Oxford Friends of the Earth. We are a registered and longstanding local environmental organisation. Please note and list Oxford FoE as an interested party. We request an invitation to the Case Management Conference on 9 Nov.

Subject to sight of Oxfordshire County Council's (OCC) Statement of Case our provisional outline areas of concern are:-

Provisional Outline Representation to reject HIF1

1. The Officers Reports (planning application & extraordinary meeting 27 Sep) are defective and fail to show an impartial objective. The ORs demonstrate inherent bias in favour of HIF1, overlooking non-compliances with NPPF.

2. The eight material planning reasons for refusal listed in the minutes of the planning meeting dated 17 & 18 Jul remain valid and unchanged.

2.1 Failure to take into account the Climate Change Committee Report to Parliament 2023.

2.2 Lack of "very special circumstances" for a development breaching the Green Belt.

2.3 Inadequate Traffic Modelling based on old data (2016) which ignores "induce demand" contrary to all empirical evidence.

The Paramics model does not take into account many factors that affect road usage - demographic assumptions, economic factors, cost of fuel, availability / quality / cost of public transport, speed limits and induced traffic.

The scheme and traffic model was heavily criticised by Prof. Phil Goodwin, Emeritus Professor of Transport Policy at University College London.

The lack of any traffic assessment on Abingdon and Didcot noted in the minutes but also Sutton Courtenay (Drayton Road), and particularly B4015 leading to Golden Balls / Nuneham Courtenay.

There is no justification for scoping out a number of key areas from the analysis. In summary the traffic modelling is deeply flawed and unreliable.

2.4 The impact on Appleford Village, not only noise (SOAEL - damaging to health & more than 19 dwelling) but a 50ft flyover overlooking the village and damaging to the landscape.

2.5 The absence of a Health Impact Assessment - in breach of policy 9 of LTCP.

2.6 Harm to Landscape at Appleford, Clifton Hampden where the landscape outlook will be changed with the loss of 283 tree features (incl. 169 mature trees, 98 tree groups, a third (35%) of hedgerows and two woodlands). In addition over 300 acres will be lost to the natural environment.

Visual impact and harm to the wetlands and riparian environment with potential flood impact at the Thames crossing or up stream.

2.7 Poor design of the Science bridge as a gateway feature to Didcot and noted by the Vale of White Horse DC. Other elements suffer from poor design (e.g. flyover at Appleford).

2.8 Conflict with Oxfordshire County Council's Local Transport and Connectivity Plan (LTCP). This is a material consideration for a major highway development.

3. Para 7 of the Secretary of State's letter dated 25 July-23.

HIF1 is a flawed scheme which will lead to more congestion, slower average speeds, greater climate and carbon reduction challenges and will not deliver long term sustainable outcomes to support housing or employment and satisfy these requirements.

With best wishes  
Chris Church for Oxford FoE.