

**From:** Oxfordshire Roads Action Alliance <oraaoxfordshire@gmail.com>  
**Sent:** 04 October 2023 09:14  
**To:** Skinner, Helen  
**Cc:** [REDACTED]  
**Subject:** APP/U3100/V/23/3326625. ORAA

Attention Helen Skinner

Please register Oxfordshire Roads Action Alliance as an interested party for the above Planning Inquiry.

Reasons to refuse this development include but are not limited to

1 The scheme is incompatible with carbon reduction targets and climate policies (CCC & County & District Council climate emergency declarations and policies).

It is estimated construction will cost 288,000 tonnes (not 154,000 tonnes as claimed but even that is a fig. 12 times OCCs own emissions) plus 23,000 tonnes annually). It will undermine national legally binding national targets for CO2 reduction.

No carbon reconciliation statement has been provided.

2. The development contradicts Oxfordshire Co Co (OCC) Local Transport & Connectivity Plan (LTCP). Non compliance with council policy may be illegal and will be open to challenge.

3. Relief from traffic congestion (as claimed) will at best be very short lived and in the long term congestion will be worse. The traffic modelling shows that average speeds in the area will fall to 18.8mph slower than now (Prof. Goodwin).

There is no plan to achieve model shift of sufficient magnitude to other forms of travel other than vague assertions to meet the initial 25% & 33% (& 50% by 2040) reductions in car trips.

4. Alternative infrastructure has not been properly assessed in the Officer Reports (OR).

5. Traffic modelling is based on old pre-covid data (circa 2015) and is inadequate. It fails to take into account induced traffic or the impact of traffic diverting from the A34 at rush hour or for road accidents. These occur frequently and will gridlock the area.

The impact of traffic on Abingdon and Golden Balls has been scoped out of the analysis. The scheme will cause increased congestion in these areas.

6. Fails to follow WebTag guidance and is in conflict with NPPF & PPGs.

7 Vale of White Horse and South Oxfordshire District Council are working on a joint local plan as part of their strategic vision for the area. This development is therefore premature, before the Joint Local Plan is available.

8. There is no Health Impact Statement (HIA) which conflicts with LTCP.  
OCC acknowledge harm to 19 dwellings (understated) in Appleford due to noise at SOAEL levels. Yet no HIA has been prepared.

9. Negative impact on landscape - Appleford flyover (50 ft), significant tree canopy loss at Clifton Hampden and riparian environment at the Thames crossing (Sutton Courtenay / Appleford / Culham).

10 There is no Habitats Regulation Assessment (HRA).

The loss of land (300 acres) and tree canopy (289 tree features, major hedgerow removal and loss of 2 woodlands) along with impact on the river environment at the Thames crossing will negatively impact biodiversity near the road.

11. Escalating costs and agreed fixed fundings from Homes England mean this road cannot be delivered in full (all sections) and claimed benefits (which we dispute) cannot be achieved.

We reserve the right to amend or make further representations when the Statement of Case from OCC is available.

ORAA is actively exploring collaboration with other groups at the Planning Inquiry.

Thank you

Oxfordshire Roads Action Alliance

<https://oraa.org.uk>