

**THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT GARDEN TOWN HIGHWAYS
INFRASTRUCTURE – A4130 IMPROVEMENT (MILTON GATE TO COLLETT
ROUNDAABOUT), A4197 DIDCOT TO CULHAM LINK ROAD, AND A415 CLIFTON
HAMPDEN BYPASS) COMPULSORY PURCHASE ORDER 2022**

**THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT TO CULHAM THAMES
BRIDGE) SCHEME 2022**

**THE OXFORDSHIRE COUNTY COUNCIL (DIDCOT GARDEN TOWN HIGHWAYS
INFRASTRUCTURE – A4130 IMPROVEMENT (MILTON GATE TO COLLETT
ROUNDAABOUT), A4197 DIDCOT TO CULHAM LINK ROAD, AND A415 CLIFTON
HAMPDEN BYPASS) (SIDE ROADS) ORDER 2022**

**THE CALLED-IN PLANNING APPLICATION BY OXFORDSHIRE COUNTY
COUNCIL FOR THE DUALLING OF THE A4130 CARRIAGEWAY,
CONSTRUCTION OF THE DIDCOT SCIENCE BRIDGE, ROAD BRIDGE OVER
THE APPLEFORD RAILWAY SIDINGS AND ROAD BRIDGE OVER THE RIVER
THAMES, AND ASSOCIATED WORKS BETWEEN THE A34 MILTON
INTERCHANGE AND THE B4015 NORTH OF CLIFTON HAMPDEN,
OXFORDSHIRE (APPLICATION NO: R3.0138/21)**

PLANNING INSPECTORATE REFERENCE:

APP/U3100/V/23/3326625 and NATTRAN/SE/HAO/286 (DPI/U3100/23/12)

Rebuttal proof of evidence of

CHRIS LANDSBURGH

Climate

1 SCOPE OF EVIDENCE

- 1.1 This Rebuttal Proof of Evidence has been prepared regarding climate relating to the following issues raised by Roger Williams on behalf of Planning Oxfordshire's Environment and Transport Sustainably (POETS), and Ng Chien Xen on behalf of the Neighbouring Parish Council Joint Committee (NPCJC).
- 1.2 Roger Williams states the scheme conflicts with the car travel reduction objectives of OCC's Local Transport Plan 2015 – 2031 (LTP4), the targets of the Local Transport and Connectivity Plan 2022- 2050 (LTCP) and national carbon emissions reduction targets.
- 1.3 Ng Chien Xen claims that OCC is not meeting its carbon targets in the LTCP, that OCC have underestimated HIF1 emissions by a factor of 4, and presents calculations comparing the Scheme's GHG emissions to local carbon budgets".
- 1.4 The purpose of this rebuttal evidence is to set out my view on these issues.
- 1.5 In this Rebuttal Proof of Evidence I have sought to avoid unnecessary repetition of matters already addressed at length, intending to assist the Inquiries. Where I do not respond to a point raised, my lack of response should not be construed nor interpreted as agreement unless explicitly stated so within this Rebuttal Proof of Evidence.

2 RESPONSE TO ROGER WILLIAMS

- 2.1 Roger Williams claims the Scheme conflicts with: The car travel reduction objectives of OCC's Local Transport Plan 2015 – 2031 (LTP4) (CD G.5); The targets of the Local Transport and Connectivity Plan 2022- 2050 (LTCP) (CD G.4); and the National carbon emissions reduction targets.(Page 3, Section 2.1).
- 2.2 Specifically, Mr Williams claims the Scheme conflicts with National and Local Car Trip Reduction Policies, stating:

"The County Council's LTCP includes the target of a 25% reduction in car trips by 2030 and an additional 33% reduction by 2040. Grant Shapps, the former Secretary of State for Transport in his forward to "Decarbonising Transport" includes the objective of making "Public Transport and active travel the natural choice for daily activities".(Page 4, Section 2.3).

Response

- 2.3 Mr Williams' point concerning alignment with OCC's Local Transport Plan 2015 – 2031 (LTP4) (CD G.5) is a point dealt with in John Disley's Proof of Evidence (JD01).
- 2.4 However, of relevance is that my Proof of Evidence (CL01) (Page 12, Section 3.15 and 3.16) and Appendix (CL2.2) (Page 16, Section 5.28) explains that it is not the responsibility of individual schemes to reduce demand on the road or decarbonise the transport sector as a whole, but more so the role of Government policy. Section 3.14 (Page 12) of my Proof of Evidence (CL01) also states:

"The Government also stated that it is "committed to ensuring that transport plays its part in decarbonising the economy and protecting the environment" (...) but suggested that it is through the Roads Investment Strategy 3 (RIS3) that it will ensure alignment to its legally binding net zero obligations."

- 2.5 Furthermore, the traffic modelling shows a reduction in road users' GHG emissions due to the scheme. Therefore, the Scheme is aligned with local and national carbon reduction targets.

3 RESPONSE TO NG CHIEN XEN

Issue 1

- 3.1 Ng Chien Xen presents in his proof of evidence OCC's trajectory to Net Zero by 2040 against actual emissions up to 2021, suggesting this demonstrates OCC is not on track to meet its carbon targets in the LTCP (Page 3, Section 7). He states:

"this is consistent with the Climate Change Committee's (CCC) June 2023 report to parliament, which states that without policy action traffic is likely to increase beyond the CCC's decarbonisation pathway."

Response to issue 1

- 3.2 In my Proof of Evidence (CL01), (Page 12, Section 3.15 and 3.16) and Appendix (CL2.2) (Page 16, Section 5.28) I explain that it is not the responsibility of individual schemes to reduce demand on the road or decarbonise the transport sector as a whole, but rather the role of Government through policy and such other measures as it deems appropriate.

- 3.3 Section 3.14 (Page 12) of my Proof of Evidence (CL01) also states:

"The Government also stated that it is "committed to ensuring that transport plays its part in decarbonising the economy and protecting the environment" (...) but suggested that it is through the Roads Investment Strategy 3 (RIS3) that it will ensure alignment to its legally binding net zero obligations."

- 3.4 In Section 3.16 (Page 12) of my Proof of Evidence, I explain that:

"This will be achieved, in large part, by non-planning measures rather than through individual road schemes. The Transport Decarbonisation Plan outlines such measures that the Government will implement to decarbonise the transport sector as a whole".

Issue 2

- 3.5 Ng Chien Xen presents calculations and claims that OCC has underestimated HIF1 emissions by a factor of 4 (Section 9,10 on Page 3 of his Proof of Evidence).

Response to issue 2

- 3.6 Ng Chien Xen's calculations are based on the assumption that induced demand should be accounted for within the traffic modelling for the Scheme and that this has not been considered. These calculations appear to be a revised version of the calculations submitted by Ng Chien Xen on behalf of Friends of the Earth Oxford (CD E.67), submitted in January 2023.

- 3.7 I have already rebutted this approach in my Proof of Evidence (CL01), which states (from Section 3.62):

"Claudia Currie's Traffic Modelling Proof of Evidence (CC01) directly addresses induced demand in Sections 5.2 to 5.11 and finds "In summary, the required modelling tests have been

carried out and have shown that ‘induced traffic’ for this Scheme is not evident and is therefore not a cause for concern.” (...)

“Therefore, I consider that the GHG assessment presented in Chapter 15 of the ES (CD A.15) remains robust with regard to the transport modelling undertaken.”

- 3.8 Therefore, despite the update to Ng Chien Xen’s calculations, I continue to consider his calculations to be invalid, and my conclusions are that the EIA (CD A.15) remain robust.

Issue 3

- 3.9 Ng Chien Xen provides calculations regarding comparison to local carbon budgets (see Sections 11 – 12 (Page 4). He then goes on to state that “Proceeding with HIF1 leads to a significant risk that Oxfordshire’s climate targets cannot be met” (heading above Section 13, Page 5).

Response to issue 3

- 3.10 Firstly, it is not appropriate to undertake a comparison against local carbon budgets, as outlined in my Proof of Evidence (CL01), which states (in Section 3.43, Page 16):

“The hyper-localised data used to develop local carbon budgets is not an appropriate comparator for the GHG assessment due to the cross-boundary nature of much of the GHG data used for the GHG assessment presented in the ES. For example, the carbon budget suggested for Oxfordshire is confined to the local administrative area of Oxfordshire and does not account for wider emissions outside the local boundary of the project.”

- 3.11 It is also clear from the Proof of Evidence presented by Ng Chien Xen that the methodology used and understanding of the Tyndall Centre budgets is fundamentally flawed. On page 11, Section 27, Ng Chien Xen states:

“The Tyndall Centre calculates carbon budgets for each local authority. It provides a recommended emissions pathway from 2020 onwards. However, these emissions are for all sectors combined, and the budget for the transport sector specifically is not provided.”

- 3.12 This is incorrect, as the emissions included within the Tyndall Centre budgets are energy only emissions. Therefore, a large number of emissions sources associated with the Scheme are not included in the budget, so it does not provide a like-for-like comparison.

- 3.13 Further, AECOM spoke to Dr Chris Jones from the Tyndall Centre in May 2022 to discuss the use of the Tyndall Centre budgets for contextualising the GHG impact of infrastructure schemes. Dr Jones confirmed the budgets are not appropriate for this purpose.

- 3.14 Secondly, even if the Tyndall Centre budget was an appropriate comparison, Ng Chien Xen’s calculations overestimate GHG emissions associated with the Scheme by accounting for supposed induced demand, as discussed above.

- 3.15 Thirdly, the HIF1 Scheme has been identified as part of a collective group of transportation measures contributing to a lower carbon Oxfordshire, thus should not be reviewed in isolation against a local budget. Investment in the proposed Scheme is part of a carefully considered and developed package of measures that all contribute to delivering a sustainable, inclusive, safe and accessible transport system. As Emma Baker highlights in her Proof of Evidence for South Oxfordshire District Council (Page 14, Section 33), “the HIF1 scheme is an integral part

of the Local Transport and Connectivity Plan, featured in Appendix 1 of Core Document G.4, which monitors and updates about the progress of the HIF1 scheme as part of the Science Vale Area Strategy.”

- 3.16 Fourthly, the GHG emissions modelling (as presented in Chapter 15 of the ES (CD A.15.15)) demonstrates that GHG emissions would decrease due to the Scheme, which would positively impact local carbon reduction targets. This calculation has been established using best practices such as the Design Manual for Roads and Bridge LA 114 Climate, where a Do Something vs Do Minimum comparison is recommended to establish impact of the scheme.

4 STATEMENT OF TRUTH AND DECLARATION

- 4.1 I confirm that, insofar as the facts stated in my rebuttal evidence are within my own knowledge, I have made clear what they are, and I believe them to be true and that the opinion I have expressed represents my true and complete professional opinion.
- 4.2 I confirm that my rebuttal evidence includes all facts that I regard as being relevant to the opinions that I have expressed and that attention is drawn to any matter which would affect the validity of those opinions
- 4.3 I confirm that my duty to the Inquiry as an expert witness overrides any duty to those instructing or paying me. I have understood this duty and complied with it in giving my evidence impartially and objectively, and I will continue to comply with that duty as required.
- 4.4 I confirm that, in preparing this rebuttal evidence, I have assumed that same duty that would apply to me when giving my expert opinion in a court of law under oath or affirmation. I confirm that this duty overrides any duty to those instructing or pay me, and I have understood this duty and complied with it in giving my evidence impartially and objectively, and I will continue to comply with that duty as required.
- 4.5 I confirm that I have no conflicts of interest of any kind other than those already disclosed in this rebuttal evidence.

CHRIS LANDSBURGH

9 FEBRUARY 2024