## Ref: APP/U3/OD'23/3326625

## OXFORDSHIRE COUNTY COUNCIL PROPOSED HIF1 ROAD

## OPENING STATEMENT ON BEHALF OF E. HENDRED PC, NEIGHBOURING PC'S JOINT COMMITTEE & POETS

There are at least eleven reasons why planning permission for the proposed road should be refused. These are, in no particular order,:-

- 1. At no stage has any or any proper assessment of the traffic consequences of HIF1 for Abingdon and Nuneham Courtney been made. The *ex cathedra* assertion in the Technical Paper prepared in response to the previous Inspector's request that travel patterns will not change is incapable of testing and the request made earlier for a Regulation 25 order is repeated. Self-evidently that assertion is implausible because major housing and employment developments are said to justify building HIF!, and must lead to substantial increases in traffic. In other words, give drivers a new road and they will use it.
- 2. No or no adequate investigation of alternatives to road building has been made, in breach of the law, of the NPPF, and of OCC's own policy.
- 3. HIF! Is the product of outdated deference to the internal combustion engine, which is no longer valid, and contravenes the guidance in the December 2023 version of NPPF and \PCC's own Local Transport and Connectivity Plan. The result has been to provide inadequate incentives for cyclists, walkers and bus passengers.
- 4. Changes in working habits following the Covid pandemic further diminish the need for major road schemes, a factor apparently ignored by the promoters of HIF!.
- 5. HIF1's promoters have ignored the existence of an obvious north-south route, that is, the Didcot to Oxford railway. This could be the basis for solving the congestion problems in the area, taken together with improved provision for buses, walkers and cyclists. There are concrete examples in this country and abroad which show that this is achievable in practice.
- 6. HIF1 is wholly inappropriate on green belt land. There has been no change in any material fact to make the encroachment appropriate or to create a 'very special circumstance' between July 2023 when the OCC Planning Committee resolved to refuse permission on this ground and September 2023 when HIF! magically became appropriate. according to that committee

- 7. It is doubtful whether the project is deliverable in practice. The cost has almost certainly been under-estimated.
- 8. There will be significant risks to the health of the populations on the route of the road from air pollution and noise, especially in Appleford and Nuneham Courtney, where conditions are already bad. These have been ignored, in breach of injunctions in the NPPF and local development plans.
- 9. Predicted traffic flows on HIF! have almost certainly been under-estimated, and the adverse effects of the road likewise. This is because induced traffic growth was ignored or downplayed.
- 10. The impact on landscape will be little short of disastrous. ~To take three instances almost at random, the viaduct across the disused gravel working north of Didcot, the Science Bridge and the Thames crossing bridge, and the elevated structure at Appleford will be intrusive urban structures, with their design leaving much to be desired.
- 11. Lastly, the Statement of Common Ground agreed between the two OCC departments shows that the applicant department relies on cooperation with the planning department to remedy the shortcoming in the scheme. However, the melancholy history of this case shows that there are few grounds for optimism that this will have the desired object.

David Woolley February 2024

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