

## Claire James

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**From:** Cllr Charlie Hicks <Charlie.Hicks@Oxfordshire.gov.uk>  
**Sent:** 25 October 2023 16:28  
**To:** Palmer, Leanne  
**Subject:** Applying to speak at planning inquiry (including making a statement of case) as an individual councillor at Oxfordshire County Council (your ref: APP/U3100/V/23/3326625, OCC's ref: R3.0138/21)  
**Attachments:** Objection to HIF1 planning application - 17th & 18th July OCC P&R committee meeting - Cllr Charlie Hicks .pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Dear Leanne,

Your ref: APP/U3100/V/23/3326625, Oxfordshire County Council's ref: R3.0138/21

I am a councillor at Oxfordshire County Council. I would like to make a representation to you in the planning inquiry process for the application of the HIF1 road in South Oxfordshire/Didcot area in my role as an individual councillor (the application titled: "*Application by Oxfordshire County Council. Site Address: Land between A34 Milton Interchange, and B4015 north of Clifton Hampden, Oxfordshire*").

**Please could you get back to me as soon as possible to let me know if I am able to take part in the planning inquiry, and if so, how?** I have detailed my reasoning below.

### Why I believe I should be able to make a representation to the planning inquiry

I believe I have a perspective that would be a useful addition to the planning inquiry hearing. I have been closely scrutinising this project within Oxfordshire County Council scrutiny functions for the last 2 years and outside of the council I work in transport policy research. I believe I have a unique additional perspective, therefore, to add to the hearing. This scrutiny and research work has included:

- In 2022, as Chair of the cross-party Transport Policy Development Working Group (a working group within the Place Overview & Scrutiny Committee, of which I am Deputy Chair), I led on the creation of a report looking at Oxfordshire County Council's then-emerging (now-adopted) Local Transport and Connectivity Plan (the LTCP5). The report included 29 conclusions and 28 recommendations. Here is the report: <https://mycouncil.oxfordshire.gov.uk/documents/s61000/Report%20of%20Transport%20Policy%20Development%20Working%20Group.pdf>
  - as part of the working group's work, we heard evidence from Professor Phil Goodwin, critiquing the traffic modelling of the HIF1 application. Here is his submission to the working group: <https://mycouncil.oxfordshire.gov.uk/documents/s61001/Report%20of%20Transport%20Policy%20Development%20Working%20Group%20Annex.pdf>

- In my work as Deputy Chair of the Place Overview & Scrutiny Committee at Oxfordshire County Council, I have been focused throughout my work on scrutinising whether the council's work *in practice* is aligned to the policies and targets set out in the LTCP5. For example, I put forward the recommendation that officers should do a review of the former LTCP (LTCP4) to compare how much of it was delivered and what the lessons learnt were. Officers accepted this recommendation and then undertook the LTCP4 review. Here is a Place Overview & Scrutiny Report subsequently scrutinising the LTCP4 review: [https://mycouncil.oxfordshire.gov.uk/%28S%2800fjalf1nzbrxm3owxfipj55%29%29/documents/s64001/CA\\_DEC2022R06a%20LTCP%204%20Review%20-%20Scrutiny%20to%20Cabinet.pdf](https://mycouncil.oxfordshire.gov.uk/%28S%2800fjalf1nzbrxm3owxfipj55%29%29/documents/s64001/CA_DEC2022R06a%20LTCP%204%20Review%20-%20Scrutiny%20to%20Cabinet.pdf)
  - Additionally, I am quoted here from a Place Overview & Scrutiny Committee meeting talking about the need to have more evidence in our policymaking with regards to assessing whether we are meeting our LTCP targets: <https://uk.sports.yahoo.com/news/councillors-demand-feedback-transport-policies-070500441.html>
- In the 17th/18<sup>th</sup> July 2023 Oxfordshire County Council Planning & Regulation Committee meeting, I spoke in objection to the application. Please find attached the document which outlines my reasons and the detail behind these. In summary, these relate to my belief that the HIF1 application: (i) does not align to the Oxfordshire County Council LTCP5 Policy 36, (ii) does not align to the Oxfordshire County Council LTCP5 headline targets, and (iii) does not align with the UK Climate Change Committee's report to parliament recommendations R2023-148 and R2022-119.
- In the 27<sup>th</sup> September 2023 Oxfordshire County Council Planning & Regulation Committee meeting, I spoke to advocate that councillors uphold reasons 1 and 8 of the planning refusal decision from the prior P&R committee meeting.
- For Reason 1, I said to P&R committee members that I believe that the application has not taken due account of the [Climate Change Committee's 2023 Report to Parliament](#). Specifically, the application does not take due account of the recommendation R2023-148; and nor does it take account of the following quotes from the report:
  - p109: “**Limiting traffic growth.** The Government has made no progress on our recommendations on clarifying the role for car demand reduction and ensuring that key enablers (road-building decisions and taxation) are aligned to delivering this.”
  - p113: “**Road transport demand.** Alongside the uptake of EVs, measures to limit growth in road traffic are also crucial for decarbonising transport, and bring wider co- benefits such as improved air quality.”
  - p128: "At a UK level, various road-building projects have recently been pushed back due to fiscal headwinds. The Government should launch a more strategic review (similar to the Welsh Roads Review) to assess whether these projects are consistent with its environmental goals (recommendation R2023-148)."
  - (p366) "The Welsh Government’s response to the independent Roads Review introduces strict environmental requirements for any future road-building projects. This provides an example of how a sector-specific Net Zero test can be applied in practice."
- For Reason 8, I said to P&R committee members that the method that had been followed in the H11 application is not "decide & provide" (which it should do to be aligned to Policy 36 of the

council's LTCP5). The "decide & provide" method is set out in the TRICS guidance paper called "guidance note on the practical implementation of the decide & provide approach". Here is the TRICS guidance note: [https://www.trics.org/img/trics%20dp%20guidance\\_web.pdf](https://www.trics.org/img/trics%20dp%20guidance_web.pdf) . On scrutiny of the methodology followed in the HIF1 application, it seems clear to me that "decide & provide" has not been followed in practice.

- Outside of my role as a councillor, I work in transport policy research. Recently, I have focused on the role of integrated land-use and transport policy so that it is possible for the UK to deliver the housing and development the country needs to meet the challenges of the housing crisis and increasing economic growth, whilst also ensuring that the transport impacts of new developments are aligning the UK to the Climate Change Committee's recommendations regarding limiting traffic growth and the UK's commitments to the Paris Agreement.

#### Clarification of the planning inquiry process from here

If I am able to make a representation to you, please could you clarify for me the process of how I take part in the inquiry and make a representation? My understanding of the process is as follows. Is this correct?

- I write to you to seek permission to take part as an individual councillor (i.e. this email)
- If you accept, I write to you by November 2<sup>nd</sup> with an outline of the arguments I am planning to make (I understand this is called the "statement of case"). A first draft of this is outlined below.
- There is then a meeting I could attend in Oxfordshire County Hall on November 9<sup>th</sup> to go through the statements of case and statement of common ground?

#### Statement of case - a heads up of what I am planning to say

If I am allowed to proceed and make a statement of case to you, to give you a heads up of what this is likely to be, I am planning to make the following points:

- I wish to repeat the points made in the 17<sup>th</sup>/18<sup>th</sup> July 2023 Oxfordshire County Council Planning & Regulation Committee meeting and the 27<sup>th</sup> September 2023 Oxfordshire County Council Planning & Regulation Committee meeting.
- I wish to make the new points that if Oxfordshire County Council were to follow its Policy 36 and use the decide & provide approach (aka "vision & validate" by Homes England) for new infrastructure to 'unlock' new housing, then it would be possible to deliver the same number of houses (or more), and to do so more quickly, more cheaply, and in a way that better aligns to the Climate Change Committee's recommendations *and* better aligns to Oxfordshire County Council's LTCP policies and headline targets. I will be in a position to flesh out this alternative plan in the November 9<sup>th</sup> meeting and with more detail again in the February planning inquiry hearing, if I am allowed to make a representation to it.

Many thanks for your time in reading this email and I look forward to hearing back from you as soon as possible.

Best wishes,  
Charlie

**Cllr Charlie Hicks**

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## Objection to HIF1 planning application - Cllr Charlie Hicks

The Planning and Regulation committee should reject the HIF1 planning application for the following reasons:

1. The HIF1 application does not align with LTCP Policy 36, specifically parts b, d or e, nor does it align with the sister document to the LTCP called “Implementing ‘Decide & Provide’: Requirements for Transport Assessments” (please see policy document attached with objection).
2. Delivering HIF1 would mean the council is very likely to overshoot our LTCP 2030 targets on 25% car trip reduction.
3. The evidence in the UK government’s Climate Change Committee progress report to parliament suggests that, to get the UK’s surface transport on track to the Paris Agreement, all road schemes should undergo a Net Zero Roads Review, like in Wales (which includes in the criteria that road building should not increase road capacity for cars). Given that this project significantly increases road capacity for cars, it is likely that an independent review would find it is not aligned to Net Zero.

**Objection 1. HIF1 does not align with LTCP Policy 36 parts b, d or e, nor the council’s policy on Implementing ‘Decide & Provide’: Requirements for Transport Assessments**

***Policy 36 of the LTCP says that we will use ‘decide and provide’ for new road schemes and promote the use of ‘decide and provide’ in new developments.***

Here is the policy from the LTCP (pages 105 to 107):

### Road schemes

As highlighted in the introduction to this chapter, Oxfordshire County Council is also responsible for overseeing the delivery of new highway infrastructure. There are situations where new roads, or widening roads and junctions may be necessary, but this is not a sustainable long term solution because we have found that road schemes often generate new demand and quickly reach capacity again

There is substantial national and international evidence of motor traffic ‘disappearance’, when road capacity is reduced, particularly where there are viable alternatives and in areas of excessive demand on road space.

Traffic ‘disappearance’ research shows that large percentages of motor traffic are not just displaced to other roads, but ‘disappear’ through a range of behavioural changes. These changes achieve the same objectives in ways that do not require car travel, for example changing mode or pooling journeys.

However, there are examples where road schemes may be required and will deliver improvements. This includes where access is needed to new developments or where the existing road is unsafe.

We will always require careful modelling for major schemes to ensure that the likely effects on the wider network are fully understood. To ensure that any road schemes align with our transport vision, we will take a ‘decide and provide’ approach rather than the traditional ‘predict and provide’ approach.



## Predict and provide

The predict and provide approach to transport planning uses past or historical traffic and socio-economic trends to determine the future need for infrastructure. Traditionally, transport planning has used this approach to forecast the transport needs of the future.

However, this approach largely replicates and reinforces the status quo. With the changes to transport that are arising due to digital connectivity, new transport modes, the COVID-19 pandemic and the need to achieve a net-zero transport system, there is an increasing risk that infrastructure is provided that does not meet or shape the transport needs of the future<sup>75</sup>.

## Decide and provide

The decide and provide approach to transport planning decides on the preferred future and then provides the means to work towards that which can accommodate uncertainty. This offers the opportunity for more positive transport planning and helps implement a transport user hierarchy by considering walking and cycling up-front<sup>76</sup>.

### Why is this policy needed?

Ensuring that Oxfordshire's transport network remains reliable and effective is key to supporting the local economy and everyday journeys. Some road capacity enhancements may be required to enable this. In accordance with our transport user hierarchy, road capacity schemes will only be considered after all other options, including opportunities for traffic reduction, have been explored.

It is important that a 'decide and provide' approach is taken during the development of new schemes to ensure that they contribute towards delivery of our vision and do not reinforce traditional transport planning approaches.

### What are the benefits for people in Oxfordshire?

Where appropriate, road capacity schemes will help to tackle congestion and pollution providing benefits to health and everyday journeys. It will also support the economy and ensure the county remains an attractive place to work and live.

Adopting a decide and provide approach to planning new infrastructure, including alongside proposed new development will mean that any road capacity enhancements align with our transport user hierarchy, prioritising the most space efficient modes of walking, cycling and public transport. This will help to create attractive environments for residents to walk and cycle in.

The decide and provide approach will also help us to deliver infrastructure that caters for future transport needs.

75. TRICS Decide and Provide Guidance 2021

76. TRICS Decide and Provide Guidance 2021



**Policy 36 – We will:**

- a. Only consider road capacity schemes after all other options have been explored.
- b. Where appropriate, adopt a decide and provide approach to manage and develop the county's road network.
- c. Assess opportunities for traffic reduction as part of any junction or road route improvement schemes.
- d. Require transport assessments accompanying planning applications for new development to follow the County Council's 'Implementing 'Decide & Provide': Requirements for Transport Assessments' document.
- e. Promote the use of the 'decide and provide' approach in planning policy development to support site assessment.

Policy 36 is the only policy in the LTCP specifically on Road Schemes and it says explicitly that we will use 'decide and provide' for new road schemes rather than 'predict and provide'.

This is fleshed out further in the County Council's policy document, ["Implementing 'Decide & Provide': Requirements for Transport Assessments"](#):

*"1.1 'Decide and Provide' instead of 'Predict and Provide'"*

*1.1.1 As outlined in the LTCP, 'predict and provide' can be broadly described as an approach to transport planning that uses current or historical traffic patterns to determine the future need for infrastructure. However, this approach tends to simply maintain the status quo by perpetuating dependence on the private car through provision of additional highway capacity.*

*1.1.2 By contrast, the 'decide and provide' approach to transport planning decides on a preferred vision of the future and then provides the means to work towards that whilst also accommodating uncertainty about the future. This offers the opportunity for more positive transport planning and will help to implement the LTCP transport user hierarchy by considering walking, cycling and public transport upfront.*

*1.1.3 This approach is captured in LTCP Policy 36 (2022a, p.106), which states that:*

*We will:*

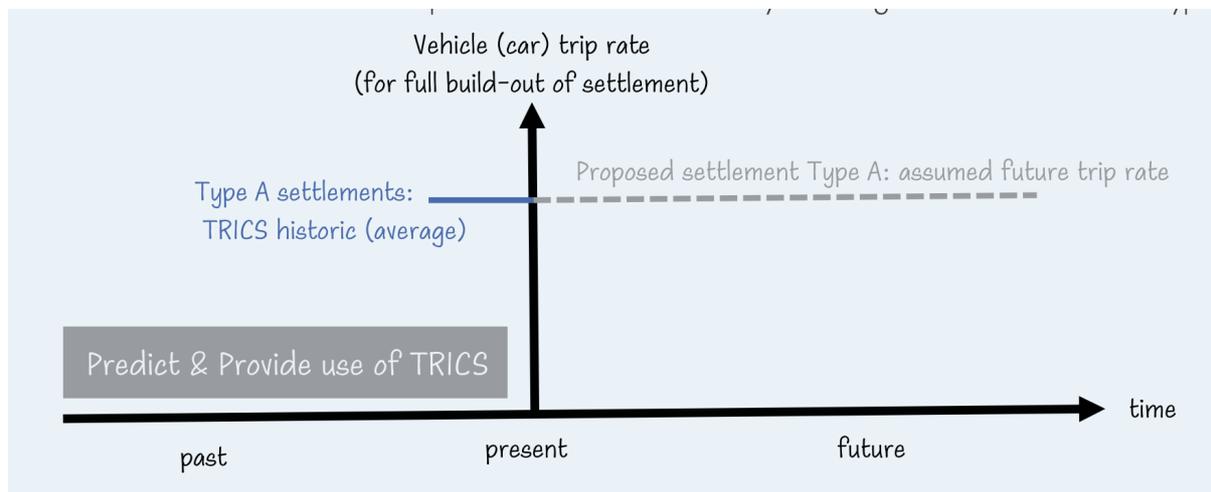
- a. Only consider road capacity schemes after all other options have been explored.*
- b. Where appropriate, adopt a decide and provide approach to manage and develop the county's road network.*
- c. Assess opportunities for traffic reduction as part of any junction or road route improvement schemes.*
- d. Require transport assessments accompanying planning applications for new development to follow the County Council's 'Implementing 'Decide & Provide': Requirements for Transport Assessments' document.*
- e. Promote the use of the 'decide and provide' approach in planning policy development to support site assessment."*

However, the HIF1 application uses 'predict & provide' modelling (predicting the number of journeys according to the historic levels of traffic from additional houses and employment sites), not 'decide and provide', which would be where the mode share that these new developments output is decided and then the developments and infrastructure are designed accordingly.

### **Predict and provide reinforces the car-dependent model of infrastructure and planning**

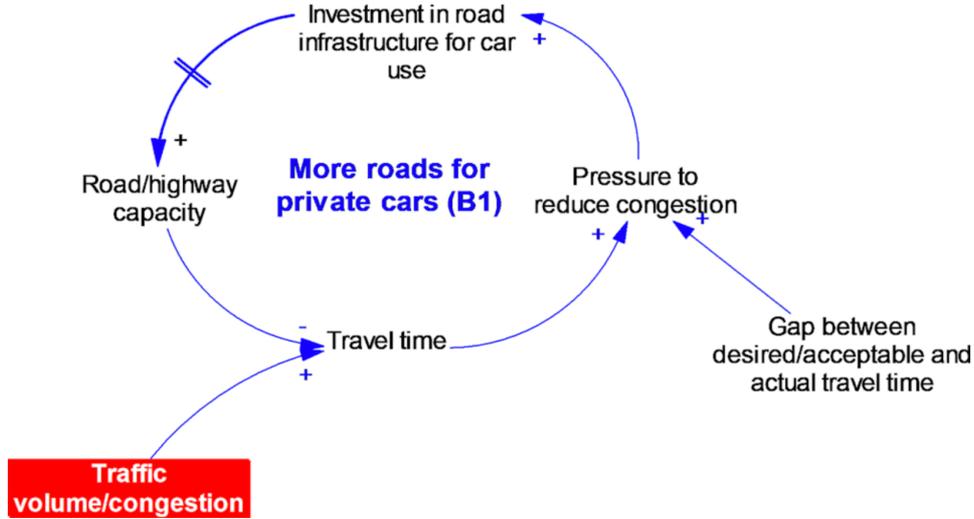
What is the 'predict and provide' approach?

This diagram describes the 'predict and provide' approach, taken from the [TRICS guidance note on this topic](#), which was used to help develop the Oxfordshire County Council policy, *Implementing 'Decide & Provide': Requirements for Transport Assessments*:



The issue with this is that it reinforces the existing car-dependent infrastructure, transport, spatial planning and development system. This is shown below in a diagram from the [OECD's report on Net Zero Transport Systems By Design](#):

Figure 3.1. Road capacity expansion under a "predict and provide" mind-set

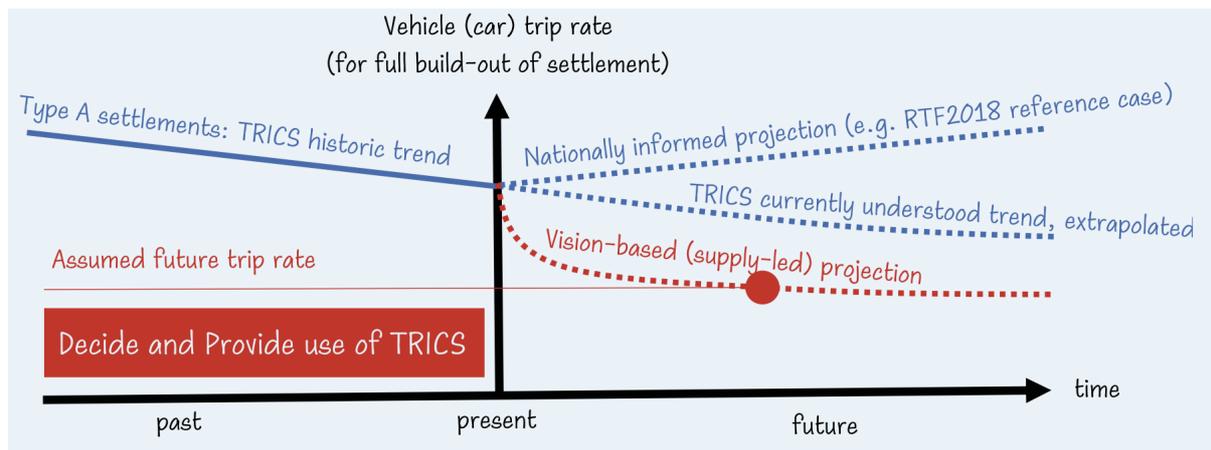


Notes: Arrows with a "+" mean that both variables move in the same direction (when one increases, the other increases and vice versa). Arrows with a "-" mean that the variables move in opposite directions (when one increases, the other decreases and vice versa). The two lines on the arrow denote a delay. The figure can be read as follows: as traffic volume/congestion increases, travel time also increases. As travel time increases, the pressure (e.g. from the population) to reduce congestion increases, which may lead to higher investments in road infrastructure for car use. Such higher investments result in higher road/highway capacity (e.g. more lanes, more roads), which in turn decreases travel time. As travel time decreases and the gap between desirable/acceptable and actual travel time closes, the pressure to reduce congestion also decreases, etc.

Source: Adapted from Sterman (2000[1]).

### What is the 'decide and provide' approach?

By contrast, the 'decide and provide' approach starts by asking "What % of all trips arising from the new development can be made by car (and other modes) and be consistent with our LTCP and climate targets?". It then sets this number as the target for which the transport infrastructure and development must meet through how the masterplan of the development is designed, and through the infrastructure that is provided.



Reference: TRICS Guidance note on Decide & Provide  
[https://www.trics.org/img/trics%20dp%20guidance\\_web.pdf](https://www.trics.org/img/trics%20dp%20guidance_web.pdf)

**Evidence: The HIF1 application uses 'predict and provide' modelling**

The traffic model used to underpin the case for and design the HIF1 scheme is primarily the Didcot Paramics model, which uses the Oxfordshire Strategic Model for the wider geography. Both these models use the 'predict and provide' approach, predicting future car trip demand based on existing travel patterns. This can be seen from the Transport Assessments.

In HIF1 Transport assessment (2020) - discussing the Oxfordshire Strategic Model

**“2.4.2 Future trip generators”**

*“The Oxford Strategic Model (OSM) has been developed to predict traffic growth based on travel conditions in 2013. The model consists of an Highway Assignment Model (HAM) representing vehicle-based movements within and across the Oxfordshire County, the Public Transport Assignment Model (PTAM) representing bus and rail-based movements across the same area and for the same periods and a five-stage multi-modal Demand Model (MMDM) that estimates the choice of frequency, mode, period, destination and sub-mode in response to changes in generalised costs of travel.*

***“These model assignments suggest that in the period 2013-2031 there would be around 25% traffic growth in the Didcot area in the morning and evening peaks, while in the inter-peak periods traffic growth could be 45%. The flow on the A4130 to the A34 is predicted to increase by 30-40% in the peaks and over 50% in the inter-peak periods.”***

In HIF1 Transport Assessment (2021) - discussing the Didcot Paramics model

***“5.3.8. For the 2034 scenarios the [Paramics] model assumes 100% demand of existing trips present in the 2017 base, and 80% of demand for new growth.”***

I.e. the modeller have answered the follow questions and made the following assumptions:

- “What’s the existing car trip demand?” Answer: “XXX”
  - **Assumption: That car trip demand will stay the same in the existing sites**
- “What’s the predicted car trip demand going to be?”
  - **Assumption: For new sites, new car trip demand will be 80% the existing demand for car trips per house or per employment site**

This is using a 'predict and provide' with a small accommodation of demand reduction for future developments. It is not starting with the mode share target that is consistent with our policies and then designing the new infrastructure accordingly.

**A 'decide and provide' approach to HIF1 would start with the travel mode share we are aiming for, and then design the transport infrastructure and developments to achieve that mode share**

A 'decide and provide' approach to modelling would start by asking: "What car trip demand would be consistent with our LTCP and climate targets?"

The answer would be along the lines of: We need car trips in 2030 to be 25% fewer than 2019 (including new developments). So, we have to significantly reduce the amount of car trips new developments will create compared to existing patterns

The next question would be: "Therefore, what design features would we need for our new developments and what kind of infrastructure would we need to support this?"

The answer would be along the lines of:

- Make the developments walkable, with local amenities and walkable infrastructure. As part of this, make the developments denser so there is higher demand for local shops and amenities that aren't car dependent. This will *internalise* movements.
- With new transport infrastructure, don't increase the road capacity for cars, as this induces new demand for car trips.
- Design more space for walking, cycling and public transport in the infrastructure that's built.
- Join up new developments predominantly with public transport, for example by ensuring good active travel connectivity to existing train stations.

**Why does this matter?**

We have to break the cycle of car-dependent infrastructure and car-dependent developments if we are to meet the goals set out in the LTCP and match our contribution to the UK meeting the Net Zero goals set out in the Paris Agreement.

The way to do this for carbon emission in surface transport associated with new developments and new infrastructure is to use the 'decide and provide' approach. If councils implement 'decide and provide', then the design of new development master plans will *internalise* movements, by providing local amenities, within walking and cycling distances, high quality walking and cycling infrastructure and connected with high quality public transport. This then means you have a much lower % of car journeys to cater for and you don't then need the car dependent infrastructure. Decide & provide is the key to shift the way we do transport and place planning to fit to decarbonising the transport system. This is why it is so important that we uphold the decide & provide policy.

If we don't do this, we continue to reinforce the cycle of car dependency and will bake-in car-dependency for decades.

**Objection 2. This project actively works against us meeting the headline targets of the LTCP**

Connected to point 1, the LTCP headline targets include reducing car trips by 1 in 4 (from post-pandemic levels) by 2030.

The Paramics model says that this road and the car-dependent developments it enables will lead to an increase of 42% car traffic flows in the area. This likely underestimates the 2034 traffic flows of building a road because it does not include or LGV/HGV movements nor does it include the 'induced demand' effects of increasing road capacity for cars. The issues of not capturing induced demand have been laid out in the paper written for Place Scrutiny by Professor Phil Goodwin.

To put it simply, if this application is accepted, we bake in car-dependent infrastructure and new developments for decades and we can wave goodbye to meeting our 2030 LTCP targets.

**Objection 3. This project goes against the advice laid out in the UK Government Climate Change Committee's in its latest Progress Report to Parliament.**

The UK government's Climate Change Committee, in its 2023 Progress Report to Parliament says (**bold** is summary, *italics* is quotes from the report):

**a) Measures to reduce car use are important for UK transport decarbonisation**

*"measures to limit growth in road traffic are also crucial for decarbonising transport"*

**b) The government is not making good progress in this area**

However, *"the Government has made no progress on our recommendations on clarifying the role for car demand reduction and ensuring that key enablers (**road-building decisions** and taxation) are aligned to delivering this"* and *"without policy action to embed a reduction in the need to travel by car or grow the availability and attractiveness of alternative lower carbon modes, traffic is likely to increase beyond the CCC's pathway."*

They go on to say: *"Policy progress in the surface transport sector over the past year has been slower than expected, with credible policies in place to meet only 38% of the required emissions reduction by the Sixth Carbon Budget period"* and *"Further work is needed to develop coherent plans and measurable targets in areas of the sector that were not quantified in the CBDP [Carbon Budget Delivery Plan] – in particular measures to reduce car demand – to make up this shortfall."*

**c) Therefore, the UK CCC recommends a series of actions to get the UK back on track for surface transport decarbonisation**

The CCC go on to recommend that the government does more to reduce car use with policies on this implemented urgently, saying: *“Measures to reduce car demand – whether through reducing the need to travel, modal shift or shared mobility – present an important opportunity to go beyond the Government’s quantified pathways and reduce the risk of relying solely on rapid ZEV uptake. This can contribute to making up the shortfall on the UK’s NDC and the Sixth Carbon Budget, but only if the development and implementation of a coherent set of policies begins urgently (priority recommendation R2022-119).”*

They also recommend: *“The strategic priority of Net Zero should mean that all scheme appraisals (**including roadbuilding decisions**) must explicitly consider the NRTTP decarbonisation scenarios and assess the emissions impacts that they will generate”*

And they recommend that the UK should follow in the footsteps of the Welsh Government in doing a Road Review to align road building to Net Zero, saying: *“At a UK level, various road-building projects have recently been pushed back due to fiscal headwinds. **The Government should launch a more strategic review (similar to the Welsh Roads Review) to assess whether these projects are consistent with its environmental goals (recommendation R2023-148).**”*

**The Welsh Roads Review says that to be aligned to Net Zero, new road schemes must meet the following purposes and criteria, including not increasing road capacity for cars**

The [Welsh Roads Review](#) sets criteria for which road building is allowed. It must meet the following criteria:

*Roadbuilding be limited to four “purposes”:*

- *supporting modal shift;*
- *reducing casualties through small changes;*
- *climate change adaptation; and*
- *supporting prosperity through access to development sites which support sustainable transport.*

*Roadbuilding should meet the following “conditions”. Schemes should:*

- *minimise carbon emissions from construction;*
- *not increase vehicle speeds that increase emissions;*
- ***not increase road capacity for cars; and***
- *not adversely affect ecologically valuable site.*

The summary diagram from the Welsh Roads Review report called “[The Future of Road Investment in Wales](#)”, lays this out:

BASED ON THE SCHEMES WE REVIEWED, WE IDENTIFY THE FOLLOWING PURPOSES & CONDITIONS FOR FUTURE ROAD INVESTMENT:



This '4x4' of purposes and conditions for future road investment should provide a **first stage filter** for sponsors of potential schemes, when considering whether a road scheme is justifiable and appropriate. It does not remove or reduce the requirement for systematic appraisal, but will save significant abortive development work on inappropriate schemes. It will obviate the need for future retrospective exercises repeating the work of the Roads Review Panel.

The Welsh roads review looked at 51 schemes. Of the schemes themselves, 17 were considered consistent with the 4x4 criteria. For a further 17 the panel found a different approach or alternative solution preferable. The panel found no case for the remaining 14.

Therefore, to meet the advice of the UK Government’s Climate Change Committee, the HIF1 application should be rejected until it has been tested on this same 4x4 criteria. **Given that it significantly increases road capacity for cars, it is unlikely to meet the criteria for Net Zero.** It should only be accepted if it is found by an independent panel to meet the 4x4 criteria and if it does not it should be rejected.