

I would like to speak at both ISH2 and ISH3:

ISH1: The applicant does not appear to me to have followed the guidance on traffic modelling. There is no satisfactory material on the traffic modelling baseline as required by DRNB LA144 para 3.10. Without this baseline there is no clear analysis of how this application will have an impact on local traffic flows.

Despite the preliminary analysis of PM2.5 provided in earlier papers, showing existing levels of PM2.5 along M3 and A34 above proposed national limits the applicant has failed to provide any analysis of how PM2.5 can be reduced. Neither has the applicant addressed the problem that in-cab emissions are higher than roadside emissions and will probably threaten the health of all users of the roads the applicant proposes to construct.

ISH3 The climate case presented by the applicant is full of gaps and the applicant has failed to relate the climate data given to the traffic modelling, as required by DRNB LA144. The final conclusion is not supported by any credible calculations. The analysis of emissions reduction is misleading and inaccurate in its statements about emissions reductions since 1990. It fails to point out that emissions reduction in UK as a result of transfer of services and manufacturing abroad are still emissions contributing to global heating. Similarly, the most relevant category, transport emissions, have reduced only 11% since 1990 (DESNZ April 2023) and are desperately behind target.

No clear analysis has been given of how the proposals relate to the government's published Road to Net Zero.

The analysis on user emissions is confused: it cannot decide whether it is looking at the 'modelled area' the whole of south east England, or an undefined area somewhere in between.

The proposals on construction emissions do not justify the level of emissions they cause. There is no explanation, for example, why it is proposed to demolish one elevated roundabout with a very similar elevated roundabout.