

Bob Hindhaugh Associates Limited

**Highway Development Control & Traffic Engineering and Planning
Registered Company No 7149206**

**THE VALE OF WHITE HORSE DISTRICT COUNCIL LOCAL PLAN EXAMINATION IN
PUBLIC**

**HIGHWAYS AND TRANSPORTATION
SUMMARY OF EVIDENCE**

BY

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December 2015

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CONTENTS

1. Introduction
2. Executive Summary and Conclusions

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Registered Company No 7149206

LIST OF SUPPLEMENTARY INFORMATION

UPDATED TRANSPORT CONGESTION REPORT

NECESSARY INFRASTRUCTURE REPORT

TRAFFIC COUNT DATA FROM OXFORDSHIRE COUNTY COUNCIL

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1. INTRODUCTION

1.1 I am Robert L Hindhaugh. I hold a BSc in Environmental Engineering, a Post Graduate Certificate in Transport Engineering and Planning. I am a Fellow and National Council Member of the Institute of Highway Engineers and a Member of the Chartered Institution of Highways and Transportation.

1.2 I was previously employed as an Area Engineer in the Highways and Transportation Service of Cheshire West and Chester Council and was employed within the Cheshire County Council since 1991 working on local, strategic and major development proposals, providing highway development control/management advice on some 15000 planning applications across the Cheshire County area over almost 20 years.

1.3 Throughout my career with Cheshire County Council, I have provided the technical guidance and instructions to developers in the detailed design process for some of the most prestigious developments within Cheshire. Some of the key major developments I have worked on and managed through the Highway development technical procedures are;

- Cheshire Oaks Retail Park in Ellesmere Port
- Cronkinson Farm Residential Development in Nantwich (750 Houses)
- Neston Town Centre Redevelopment.
- University Way Development and link road in Crewe.

Most recently the largest Marks and Spencer's store in Europe, which is now open in Ellesmere Port.

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1.4 In addition to the above, I have also represented the County Council as Chief Highway witness at several Local Plan Inquiries and provided expert highway advice on a number of Planning Public Inquiries. I was also the lead officer in developing the Cheshire Design Aid for Residential and Industrial Estates.

1.5 Since leaving the local authority in 2009, I have using my technical knowledge and experience continuing in this field of work, setting up my own independent consultancy working extensively and primarily in the area of highways and Transportation. On this basis, I was instructed by the Western Vale Villages Consortium (WVV) to provide the necessary highway reports dealing with the potential traffic impacts that the on the local highway network in close proximity to the A420 strategic highway route.

1.4 Over the last 3 years I have provided technical advice and information to inform the WVV and local authorities regarding the traffic issues on the A420. I have outlined the technical background to the work carried out in relation to the proposed Local plan and examined the broad principles of the development proposals contained within it in relation to the local highway infrastructure in assessing the traffic related implications on the A420 and the local road network within the Western Vale area. I have attached my highway and transportation reports as appendix 1 to this proof of evidence.

1.5 I have, therefore, set out in this statement my professional background and qualifications and the methodology behind my Highway and transportation report which form the appendices of this proof. I do not wish to waste any valuable inquiry time as all the WVV evidence is attached in a main report. I have therefore, provided the summary and conclusion.

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2.0 EXECUTIVE SUMMARY OF FINDINGS RELATING TO MATTERS 7,10 and 13 AS AT 17 DECEMBER 2015.

2.1 The local highway network link from the M4 at Junction 15 via the A419/A420 interchange to Oxford is already and demonstrably running at 70% -75% of its full operational capacity at peak times. Neither Swindon Borough Council nor the Vale of White Horse District Council have provided any up to date evidence by way of traffic assessments based on the forecast transport requirements of existing riparian residents and businesses likely to be affected by additional planned housing and industrialisation along this corridor. Nothing relevant appears in either the VWHDC or the SBC draft local plans. Nor has additional traffic likely to be generated by such forecast development been factored into either of these plans. Through various standard traffic assessments using robust vehicle trip rates, this Assessment demonstrates that the existing highway infrastructure cannot be expected to cope with any new development without substantial and seemingly unbudgeted expenditure.

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2.2 There is no clearly defined timetable or delivery mechanism within any of the emerging local plans that further demonstrate the processes or procedures for delivery of any reasonable form of sustainable transport solution that would significantly reduce the traffic generation growth effects on this link. The predicted modal shift of 15% as highlighted in the Swindon Transport Strategy are optimistic without any background evidence to substantiate this figure, it is difficult to accept this as a realistic objective.

2.3 It is reasonable to conclude following this Assessment including all the current planning applications in place within the VWHDC area close to the A420, that there will be significant transport or highway related reasons why the proposed development allocations should not be encouraged unless infrastructure and sustainable transport provision is fully identified, committed and delivered by the developers and local authority. At this stage of the local plan proceedings there is no realistic adopted transport policy in place with regards to safeguarding traffic management and highway improvements the Highway Authority are at present in the process of appointing consultants to determine exactly what is required.

2.4 There are no grants from central government anymore and the delivery relies on developers. The current CIL levels in my opinion are not set at prerequisite level to provide these vital improvements as was seen on a recent planning application at Fernham Fields where the developer stated any improvement was financially unviable because of the level of affordable housing that had to be provided. It is clear from all current traffic flow data that the additional proposed developments will have a serious impact on the network and without significant improvement the addition traffic effects caused by new development must be classed as 'Severe' as outlined in the NPPF.

2.5 The WVV consider there are three matters of which the Inspector requires answers and evidence.

- **Matter 7 – Supporting Infrastructure and Services.**

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Does the plan make adequate and soundly-based provision from infrastructure and services necessary to support new development?

The WVV response would be no at this present time. Work between all local authorities and the WVV is on- going and as stated within the main report my Necessary Infrastructure Provision report has been accepted by the highway authority who are using it as a base document for further work. However, no decision on what is to be provided will be known until April/May 2016. Therefore, this places the planned development into doubt in terms of deliverability.

- **Matter 10 – Strategy for Western Vale Sub-Area**

The WVV do not feel a suitable strategy can be developed in the absence of any up to date information regarding specific improvements to the A420. There are no trigger points as to when improvements and other sustainable measures should be implemented. With much of the infrastructure improvements being provided by developers, the current rate of CIL is not sufficient to make this case.

- **Matter 13 – Viability, Deliverability, Monitoring and Contingency.**

Quite clearly the Inspector makes a valid reference here with regard to the NPPF paragraph 174 with regard to cumulative impact. In the absence of any clear delivery policy to support the local plan then the local plan in its current form does not meet this test. Therefore, it is without question that more development that requires access via the A420 will have a detrimental effect in terms of cumulative impact and the delays associated with it, particularly in light of the approved 'Eastern Villages' development just across the County boundary .

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3.0 CONCLUSIONS

3.1 This Assessment and the supplementary report has considered the transport and highway implications for the proposed development sites being put forward by Vale of White Horse District Council, current planning applications awaiting a decision, and the effects of the Eastern Villages proposals across the county border in Swindon. I have examined the predicted additional traffic flows as part of any pre-local plan development proposals and the major development allocations of the Swindon Local Plan, namely the Eastern Villages and employment park proposals all of which have significant cross boundary traffic issues. I have also examined the traffic effects on the local link roads from the A419 (T)/A420 Roundabout to the A420/A415 junction along the A420 corridor.

3.2 These development proposals do not strike any balance in terms of delivery. They do not encourage the use of sustainable modes of transport via new pedestrian/cycleway links or adequate public transport provision. The emerging Local Plan is diminished by its seeming lack of any strategic thinking when developing the document and does not evenly distribute development across the VWHDC geographical area. There is a number of brownfield sites that could be utilised and help preserve the rural concepts of the Vale area.

3.3 VWHDC clearly accepts that this is a congested route about which it should have already expressed major concerns. Some of the proposed development sites are not near or adjacent to the local centres and therefore fail to create good accessibility opportunities by sustainable modes such as walking, cycling and public transport.

3.4 It has been demonstrated that the proposed developments will result in a significant increase of around 8000 two way trips during the AM peak period and of 8500 two-way trips

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during the PM peak at the end of the planned period in 2031. In the absence of any real prescribed measures in place to encourage alternative modes of travel these additional vehicle trips will only greatly worsen an already congested highway network, which in turn could increase the accident risk potential for all road users. Therefore, traffic flows to and from the proposed development allocation sites will be disproportionately high in comparison to other rural areas and are in my view unsound

3.5 In the absence of any practical solutions put forward by either the VWHDC or OxCC at this time it is therefore arguable that due to the possible frustration of drivers caught up in excessive congestion levels, these Local Plan proposals could contribute to existing road safety problems. It is the WVV consortium view that with respect to matters 7, 10 and 13 the Council cannot in any certainty give assurances that the benchmarks required will be met with the planned period.

3.6 In its current form the emerging Local Plan and Local Transport Plan of both Councils are in contravention of many of its existing policies applicable to transport assessment and sustainable travel. They fail to comply with the Government's flagship National Planning Policy Framework ("NPPF"). They also fail to deliver any high quality development in the heart of Oxfordshire. The opportunity for access by sustainable modes is neither realistic nor really achievable. In Swindon for example there is significant weight being placed on a 'Rapid Transit system' without bus lanes. Systems of this type take a long time to implement and it is safe to say that a significant amount of development will have taken place prior to its provision. It is reasonable to conclude that there are some demonstrable transport or highway related reasons why the proposed developments should not be permitted through the Local Plan EIP process without the commitment to adequate infrastructure provision as the development generated

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traffic will without doubt having regard to the NPPF paragraph 174 there will be significant cumulative impact on the network that would be 'Severe' and on that principle fails to accord with the NPPF standards and Policy

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UPDATED TRANSPORT CONGESTION ASSESSMENT.

ON A419/A420/A415 LINK

ON BEHALF OF

WESTERN VALE VILLAGES CONSORTIUM OF
PARISH COUNCILS LISTED

AS A

**REPRESENTATION TO THE VALE OF WHITE HORSE DISTRICT COUNCIL
EMERGING LOCAL PLAN TO 2031 BY REFERENCE TO ITS DETRIMENTAL
TRAFFIC AND ROAD SAFETY EFFECTS ON THE LOCAL HIGHWAY NETWORK
(A419/A420/A415 LINK)**

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CLIENTS – Western Vale Villages Consortium of Parish Councils (“WVV”)

Wanborough PC

Bourton PC

Bishopstone PC

Ashbury PC

Compton Beauchamp Parish Meeting

Longcot PC

Watchfield PC

Shrivenham PC

And a number of other councils along the A420 associated with WVV, namely,

Faringdon Town Council

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Uffington PC

Buckland PC

Great Coxwell PC

Hinton Waldrist PC

Littleworth Parish Meeting

Kingston Bagpuize PC

Buckland PC

Fyfield and Tubney PC

Fernham Parish Meeting

Frilford Parish Meeting

Hatford Parish Meeting

Little Coxwell PC

Pusey Parish Meeting

And

with the valued support of CPRE Oxon

14th MAY 2013(Original report issued)

21 DEC 2015 (updated traffic flows)

TRANSPORT ROUTE CONGESTION ASSESSMENT

CONTENTS

EXECUTIVE SUMMARY

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1.0 INTRODUCTION

**2.0 DESCRIPTION OF LOCAL ROADS AND OF THE ROUTE A419/A420 / A415 AFFECTED BY
PLANNED DEVELOPMENT**

3.0 GOVERNMENT AND REGIONAL POLICY RELATING TO TRANSPORTATION

4.0 LOCAL PLAN DEVELOPMENT PROPOSALS

5.0 SUSTAINABILITY – ALTERNATIVE MODES OF TRANSPORT

6.0 EXISTING TRAFFIC FLOWS AND FUTURE PREDICTIONS

7.0 OTHER HIGHWAYS CONSIDERATIONS

8.0 REPORT CONCLUSIONS AND RECOMMENDATIONS.

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TABLES

TABLE 1: POLICY CONCERNS WITHIN VWHDC LOCAL PLAN

TABLE 2: POLICY CONCERNS WITHIN SWINDON BOROUGH COUNCIL PLAN

TABLE 3: RECENT LARGE SCALE DEVELOPMENT PLANNING APPLICATIONS AWAITING A DECISION

TABLE 4: EXTRACT OF TABLE 2 OF DEPARTMENT OF TRANSPORT TECHNICAL NOTE TA 79/99

TABLE 5: EXTRACT OF TABLE 3 OF DEPARTMENT OF TRANSPORT TECHNICAL NOTE TA 79/99

TABLE 6 - CURRENT TRAFFIC FLOW SUMMARY – WEEKLY AVERAGE OF EXISTING AM PEAK TRAFFIC
ONTO A420 LINK (2013)

TABLE 7 - CURRENT TRAFFIC FLOW SUMMARY – WEEKLY AVERAGE OF EXISTING PM PEAK TRAFFIC
ONTO A420 LINK

TABLE 8 - SUMMARY OF TRIP GENERATION FOR PROPOSED EMPLOYMENT RELATED DEVELOPMENT
PER 100m² OF GROSS FLOOR AREA (GFA).

TABLE 9 - SUMMARY OF TRIP GENERATION FOR PROPOSED RESIDENTIAL UNIT

TABLE 10 - TRICS TRIP RATE SUMMARY – AM PEAK FOR MAJOR PLANNING APPLICATIONS
DEVELOPMENT TRAFFIC AS ABOVE ONTO A420 LINK (RESIDENTIAL USE)

TABLE 11 - TRICS TRIP RATE SUMMARY – PM PEAK FOR MAJOR PLANNING APPLICATIONS
DEVELOPMENT TRAFFIC ONTO A420 LINK

TABLE 12 - TRICS TRIP RATE SUMMARY – AM PEAK FOR VWHDC LOCAL PLAN DEVELOPMENT
TRAFFIC AS ABOVE ONTO A420 LINK (RESIDENTIAL USE)

TABLE 13 - TRICS TRIP RATE SUMMARY – PM PEAK FOR VWHDC LOCAL PLAN DEVELOPMENT
TRAFFIC ONTO A420 LINK

TABLE 14 - TRICS TRIP RATE SUMMARY – AM PEAK FOR OTHER DEPOSITED PLANNING
APPLICATIONS AWAITING DECISION IN VWHDC

TABLE 15 - TRICS TRIP RATE SUMMARY – PM PEAK FOR OTHER DEPOSITED PLANNING
APPLICATIONS AWAITING DECISION IN VWHDC

TABLE 16 - TRICS TRIP RATE SUMMARY – AM PEAK FOR VWHDC LOCAL PLAN DEVELOPMENT
TRAFFIC ONTO A420 LINK (PROPOSED EMPLOYMENT TRAFFIC)

TABLE 17 - TRICS TRIP RATE SUMMARY – PM PEAK FOR VWHDC LOCAL PLAN DEVELOPMENT
TRAFFIC ONTO A420 LINK (PROPOSED EMPLOYMENT TRAFFIC)

TABLE 18 - TRICS TRIP RATE SUMMARY – AM PEAK FOR SWINDON LOCAL PLAN DEVELOPMENT
TRAFFIC ONTO A420 LINK RESIDENTIAL

TABLE 19 - TRICS TRIP RATE SUMMARY – PM PEAK FOR SWINDON LOCAL PLAN DEVELOPMENT
TRAFFIC ONTO A420 LINK

TABLE 20 - TRICS TRIP RATE SUMMARY – AM PEAK FOR SWINDON LOCAL PLAN DEVELOPMENT
TRAFFIC ONTO A420 LINK (PROPOSED EMPLOYMENT TRAFFIC)

TABLE 21 - TRICS TRIP RATE SUMMARY – PM PEAK FOR SWINDON LOCAL PLAN DEVELOPMENT
TRAFFIC ONTO A420 LINK (PROPOSED EMPLOYMENT TRAFFIC)

TABLE 22 - PROPOSED TOTAL TRIPS ONTO A420 LINK JUNCTION AM PEAK

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TABLE 23 - PROPOSED TOTAL TRIPS ONTO A420 LINK PM PEAK

APPENDICES TO THE TRANSPORT ROUTE CONGESTION STUDY

APPENDIX: 1 NECESSARY INFRASTRUCTURE REQUIREMENTS REPORT

APPENDIX: 2 AUGUST 2015 AADT TRAFFIC COUNT DATA

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EXECUTIVE SUMMARY

The local highway network link from the M4 at Junction 15 via the A419/A420 interchange to Oxford is already and demonstrably running at 70% -75% of its full operational capacity at peak times. Neither Swindon Borough Council nor the Vale of White Horse District Council have provided any up to date evidence by way of traffic assessments based on the forecast transport requirements of existing riparian residents and businesses likely to be affected by additional planned housing and industrialisation along this corridor. Nothing relevant appears in either the VWHDC or the SBC draft local plans. Nor has additional traffic likely to be generated by such forecast development been factored into either of these plans. Through various standard traffic assessments using robust

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vehicle trip rates, this Assessment demonstrates that the existing highway infrastructure cannot be expected to cope with any new development without substantial and seemingly unbudgeted expenditure.

There is no clearly defined timetable or delivery mechanism within any of the emerging local plans that further demonstrate the processes or procedures for delivery of any reasonable form of sustainable transport solution that would significantly reduce the traffic generation growth effects on this link. The predicted modal shift of 15% as highlighted in the Swindon Transport Strategy are optimistic without any background evidence to substantiate this figure, it is difficult to accept this as a realistic objective.

It is reasonable to conclude following this Assessment including all the current planning applications in place within the VWHDC area close to the A420, that there will be significant transport or highway related reasons why the proposed development allocations should not be encouraged unless infrastructure and sustainable transport provision is fully identified, committed and delivered by the developers and local authority. At this stage of the local plan proceedings there is no realistic adopted transport policy in place with regards to safeguarding traffic management and highway improvements the Highway Authority are at present in the process of appointing consultants to determine exactly what is required. There are no grants from central government anymore and the delivery relies on developers. The current CIL levels in my opinion are not set at prerequisite level to provide the vital improvements as was seen on a recent planning application at Fernham Fields where the developer stated any improvement was financially unviable because of the level of affordable housing that had to be provided. It is clear from all current traffic flow data that the additional proposed developments will have a serious impact on the network and without significant improvement the additional traffic effects caused by new development must be classed as 'Severe' as outlined in the NPPF.

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1.0 INTRODUCTION

1.1 Bob Hindhaugh Associates Ltd have been appointed to prepare a Transport Route Congestion Assessment ("the Assessment") on behalf of Western Vale Villages ("WVV") Consortium of Parish Councils and others associated with it to demonstrate to the Vale of White Horse District Council ("VWHDC") that all development in this area with direct traffic links onto the A420 will have a detrimental and adverse traffic effect on the A420 Swindon to Oxford link road. The Assessment will also be submitted to Swindon Borough Council. The report will also demonstrate that with the additional traffic the proposed developments will generate, the A420 link will be significantly congested for long periods in the day which will create further congestion on the lesser highway network through unwanted and unwarranted 'rat running' and 'bottlenecks' creating major hold ups in the local area. The route location plan is shown in Appendix 1.

1.2 Over the last couple of years Bob Hindhaugh Associates Ltd as the retained consultant of WVV, have actively engaged with OxCC and other interested parties regarding the ongoing concerns of traffic growth on the A420 corridor. I have, using existing traffic count data issued by Oxfordshire County Council along with other recent traffic count data from the VWHDC planning portal, carried out extensive traffic analysis and highway assessments in the area to demonstrate that the traffic flow situation has increased since initially preparing this report in 2013. For continuity the format of this and other reports has not changed with the exception of the traffic situation on the A420 and the WVV would like this document submitted to the Inspector for consideration for the Part 2 discussions. The format of this report and its processes are considered accurate and applicable. Based on these discussions with WVV, the purpose of the Assessment is to consider the significantly high transport

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implications the Local Plan development proposals will have on the local highway network and to demonstrate how the levels of accessibility by sustainable modes of transport are currently inadequate and do not help to reduce new trips by car in line with current and emerging policy.

1.3 The Assessment will also demonstrate that the proposed Local Plan developments (and other applied for developments in the area) will materially affect current traffic conditions, which will significantly increase the levels of peak time congestion residents already endure; and that these proposals are not in accordance with local and national planning policy and guidance. One key factor of any future planned development is the transport sustainability of any proposed development and this is considered as a fundamental issue which is clearly set out and defined in the National Planning Policy Framework ("NPPF"). An accessibility assessment of the alternative modes of travel, e.g., Walking, Cycling, and Public Transport use and provision is presented in Section 5 of the Assessment.

The structure of the report is as follows:

- Section 2 describes in detail the existing routes, traffic effects on the surrounding area, and the local highway network.
- Section 3 examines the transport policy as set out in the NPPF, Regional Policy and the emerging Vale of White Horse District Council (VWHDC) and Swindon Borough Council (SBC) local plan development proposals with regard to local issues.
- Section 4 considers the Vale of White Horse District Council (VWHDC) and Swindon Borough Council (SBC) Local Plan development proposals and their direct impact with regard to additional extensive traffic flows on the proposed A419(T) – A420 – A415 link and

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surrounding rural network. It also provides a brief explanation of existing local problems and issues.

- Section 5 considers the above policy in terms of local sustainable transport infrastructure in relation to the route corridors and the surrounding rural area including pedestrian and public transport links on the route between Swindon and Oxford centres;
- Section 6 details the trip generation/attraction associated with both the existing traffic situation and the proposed Local Plan land uses in this area in order to determine the net impact on vehicular movements associated with the current deposited/committed planning applications and large scale developments proposal within the emerging local plans on the local highway network. This includes a description of the technical assessments between the A419/A420 White Hart roundabout junction, up to the A415 junction taking into account the affected priority junctions on this link; Furthermore, the proposed 'Eastern Villages' to the East of Swindon will undoubtedly have a detrimental traffic impact on the A420 Swindon to Oxford route. This additional cross boundary traffic flow must also be given serious consideration as part of this Assessment, in presenting to the Inspector a fully impartial and robust report.
- Section 7 Summarises the measures required to improve the highway network and the measures are set out in Appendix 1 to this report.
- Section 8 provides a conclusion to the report and makes suggested recommendations.

1.4 In summary, the report is prepared in connection with the traffic and transportation implications on the A419 (T) - A420 White Hart Roundabout – A415 junction that the proposed development sites

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contained within both the Swindon Borough Council and the Vale of White Horse District Council Local Plans will have a bearing directly on this strategic link and other roads locally. While I have assessed the local plans independently, I have also taken into account other committed, permitted, and submitted development proposals previously accepted by the Vale of White Horse District Council prior to the Local Plan development proposals being produced, and since.

1.5 The effects of traffic on other local roads that have a direct link to the A420 has also been considered. However, to compile a robust case, detailed consideration of the cross boundary vehicle trips as part of the emerging Borough Council Local Plan, particularly sites on the Eastern side of the Swindon boundary have also been included to represent a realistic case in terms of the traffic situation and its impact.

2.0. DESCRIPTION OF LOCAL ROADS AND OF THE ROUTE A419/A420 /A415 AFFECTED BY PLANNED DEVELOPMENT

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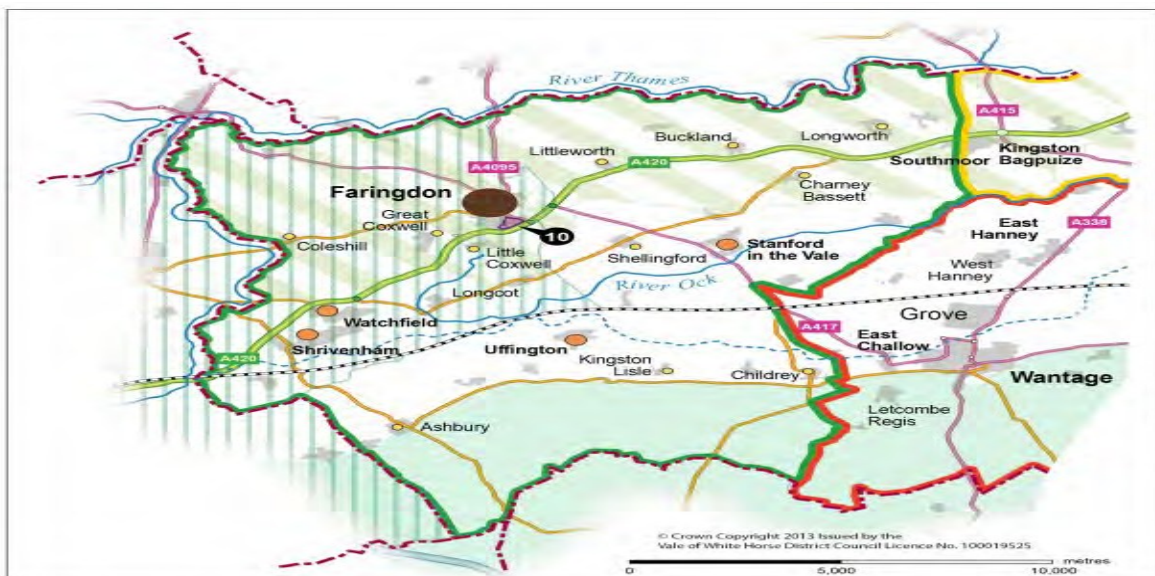
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2.1 AREA LOCATION

2.2 The highway link under consideration in this Assessment is from the A419 (T)/A420 White Hart roundabout along the length of the A420 until it meets with the junction of the A415. (***A point to be noted is the A419(T) is within the Wiltshire boundary area. However, it does have a significant role to play in the cross boundary traffic flow levels on the A420 Swindon to Oxford link***). A plan of this route is shown in **Appendix 1** of this report. As part of the assessment, other junctions which are already experiencing congestion and stress have also been reviewed and analysed. These junctions on the A420 from West to East are described in some detail below.

2.3 ROUTE DESCRIPTION

Plan below A420 from the County Boundary within the western Vale



2.4 The route is typically urbanised soon after the White Hart roundabout towards Gablecross roundabout, with a number of access points to Sainsbury's supermarket, Thornhill Road, and

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Horstmann Close. The Police Headquarters is close by heading East with a signalised junction that has no right turning facility when travelling West along the A420. I will discuss these junctions in more detail in paragraph 2.9 below.

2.5 The A420 becomes predominantly rural within a short distance with verges, no footways, and no street lighting. As the A420 approaches Acorn Bridge (a railway bridge crossing over the A420) the carriageway narrows down to 3.7 metres with a 4.8 metre height restriction. (Signage instructs large vehicles to keep to the centre of the carriageway). The A420 is 50 mph limited at this point and the carriageway feels constrained. The Forward Stopping Site Distance ("FSSD") at the bridge should be a minimum of 160m. On my site inspection, I do not consider the actual FSSD is to the appropriate standard for that of a 50pmh speed limit. (The existing network characteristics and defects are described in Section 7 of this report)

2.6 Continue travelling east towards Oxford along the A420 approaching Lower Field Farm, there is a right turn into Townsend Road towards Shrivenham. When exiting Townsend Road onto the A420, there is a considerable delay for traffic especially when making the right turn manoeuvre towards Oxford at peak times. This delay is due to the high volume of traffic travelling west towards Swindon, even with the presence of a traffic speed camera close to this junction to slow vehicles down. This still does not provide a sufficient break in traffic flow to allow vehicles to gain access. From my site inspection, this appears to have the opposite effect by intensifying the traffic build up at this location particularly on the Townsend Road junction. (a well-established 'rat run' in the local area) This is further confirmed in the attached photograph survey in Appendix 4 to this report. Continue along the route East towards Oxford on the A420 and again long queues form at three arms of the 4 arm Watchfield Roundabout.

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2.7 From the Watchfield Roundabout, travelling east towards Oxford the A420 becomes very rural in its characteristics with variant 60mph then 50mph speed limits until it reaches the Faringdon Roundabout. This section has two directional speed cameras before it eventually reaches the Faringdon Roundabout at its junction with the A417. The evidence of this extensive queuing problem is highlighted in the photographic survey, (N25 and N26). Also highlighted in photograph N27 is an example of the congestion levels at Faringdon Road on the approach route to Watchfield Roundabout. Although not as severe as other highlighted junctions, any increase in vehicular movements at this location as a result of increased development must have a significant and detrimental impact at the Faringdon Road/Majors Road junction with potential queuing levels extending into Shrivenham Village. Inevitably, without road improvements, this problem would be further exacerbated by any future development proposals creating increased levels of 'rat running' in this location.

2.8 Park Road, Faringdon, experiences regular peak time congestion with traffic queues along its length when heading south towards the A420. Vehicles wanting to turn right at the roundabout and travel West towards Swindon, actually drive along the centre of the carriageway at frequent intervals which is a dangerous practice which is born out of frustration due to excessive queues. The speed limit at this location is 50mph which reduces to 30mph when travelling north towards Faringdon. There are proposals for a 350 unit housing estate and 7.3 hectares (75000m²) of mixed used employment allocations within the VWHDC emerging Local Plan.

2.8 Appendix 1 the most up to date traffic flows from OxCC and sets out and identifies to some extent the impact on the local network of the proposed distribution of traffic of both committed and permitted development and the extent of the traffic effects the VWHDC emerging Local Plan will have, based upon current traffic patterns close to this strategic route. I have also considered the major

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impact of the Swindon Borough Council emerging Local Plan initiative – the ‘Eastern Villages’ development - proposals will have on the A420 – A415 link.

2.9 KEY JUNCTIONS AFFECTED BY BOTH VWHDC AND SWINDON LOCAL PLANS:

- 1) The 5 arm White Hart roundabout (RAB) junction with A4312 (Oxford Road) /Ermin Street / A419 / Merlin Way / A420.
- 2) Sainsbury's Toucan Crossing and Gablecross 5 arm Roundabout junction with Sainsbury's / Thorn Hill Road / Horstmann Close / A420.
- 3) A420 Police H.Q. Signalised junction (with no right turn heading west)
- 4) Townsend Road junction onto A420, (queuing and right turn issues)
- 5) Watchfield 4 arm RAB junction with A420 / Majors Road B4508 / Faringdon Road.
- 6) Faringdon 3 arm RAB junction with A420 / A417 Park Road.

(Junction N1) The 5 arm White Hart interchange roundabout (RAB) junction with A4312 (Oxford Road) / Ermin Street / A419 / Merlin Way / A420, is mainly a single carriageway road, circa 7.3m wide. It is classed as part of the Principal Route Network (“PRN”) and is the major strategic distributor road linking Swindon and Oxford and towns and villages along this route. It is also the main traffic feeder road onto the A419 (T) to junction 15 of the M4 motorway. It also provides vital transport and traffic

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links to other subsidiary towns and big villages such as, e.g., Faringdon and villages such as Shrivenham. In addition, access and egress is also provided to a number of smaller villages, for example, Great Coxwell. It is subject to a speed limit of 40mph, although in specific locations along the route there are 30mph speed limits in place. In the main it does not have the benefit of street lighting.

There are currently some limited footways/cycleways on or adjacent to the road with the exception of the major junction zones as mentioned above. The footways on each side of the road terminate after relatively short distances, providing no safety areas for pedestrians or cyclists alike. This junction not only links Swindon to Oxford, Bristol and Heathrow airports but also links Swindon to the Midlands via the M5 Motorway.

(Junction N2) Sainsbury's Toucan Crossing and the Gablecross 5 arm Roundabout junction with Sainsbury's / Thorn Hill Road / Horstmann Close / A420. This is a major junction serving retail developments. Large vehicles exiting from Thorn Hill Road onto the A420, during peak times have to wait until the signals at the Toucan crossing turn red before they can gain access onto Gable Cross Roundabout. This is due to high volumes of traffic heading East towards Oxford.

(Junction N3) A420 Police H.Q. This signalised junction has no right turn when heading West towards Swindon. This forces vehicles to drive up to and around **junction 2**, Gablecross Roundabout, which further exacerbates the congestion issues at this location.

(Junction N4) Townsend Road junctions onto A420. At peak times queues form and back up along Townsend Road and the minor road signposted to Bourton. Traffic travelling from Shrivenham, Bourton, Ashbury, and Bishopstone experience long delays waiting to gain entry onto the A420 at this location. Right turn movements are near impossible at peak times due to the large volumes of traffic travelling on the route.

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(Junction N5) Watchfield 4 arm RAB junction with A420 / Majors Road B4508 / Faringdon Road. Traffic travelling east towards Oxford have the benefit of a filter lane which avoids the Watchfield Roundabout. At peak time in particular long traffic queues form in both directions along the A420 approaching this junction.

(Junction N6) The Faringdon 3 arm Roundabout junction of A420 / A417 Park Road experiences congestion at peak times as traffic builds up in both directions heading towards Faringdon with long queues forming very quickly. In addition to this, the heavy volumes of traffic heading away from or out of Faringdon using Park Road also experience traffic queues with right turners driving along the middle

of Park Road towards oncoming traffic to gain access onto the A420 before heading west towards Swindon.

3.0 NATIONAL AND REGIONAL TRANSPORTATION POLICY

3.1 Overview

- 3.1.1** The Assessment examines the proposed Local Plan development proposals of the Vale of White Horse District Council in the context of the relevant traffic and transportation policy guidance issued by the Department for Transport ("DfT") and the Department for Communities and Local Government ("DCLG"), together with local policies issues by VWHDC. As part of this Assessment the WVV are of the view that the Inspector must give detailed consideration to significant SBC development proposals to the East of Swindon known as the 'Eastern

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Villages’. These are very substantial development proposals (fully described in the SBC adopted Local Plan) that will have a far reaching effect on traffic levels on the A419/A420.

3.1.2 A wide ranging approach needs to be fully considered when providing a suitable and deliverable development transport strategy which is the backbone of any emerging Local Plan policy document. The local highway and planning authorities must work very closely together to ensure that any development aspirations can be fully integrated into the highway network without adding to congestion on any of the strategic routes, or at the very least they must be completely satisfied that all resulting predicted traffic flows can be safely accommodated on the existing highway network. All such issues must be taken into account relating to current and emerging policy and guidance documents. In terms of the VWHDC Local Plan, I have balanced this Assessment on the following key policies relating to new residential and employment developments as proposed in the emerging VWHDC and SBC Local Plans.

- National Planning Policy Framework (“NPPF”), March 2012,
- Manual for Streets (“MfS”)
- Vale of White Horse Council’s current Development Plan
- Vale of White Horse District Council emerging Local Plan 2029.
- Oxfordshire County Council Local Transport Plan 2013-2030
- Elements of the Swindon Emerging Local Plan, in particular the proposed Eastern Villages.

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3.1.3 The golden thread running through current national and local policies is to promote and deliver and enhance sustainable transport objectives. This is a key factor in defining any sound transport strategy as part of both these Councils' emerging local development plans to 2026 and 2029 respectively. There is a range of documents that provides advice and guidance identifying that the historic approach of adopting rigid policies and standards and then considering any housing or employment development proposals later and in isolation of each other is just not appropriate or desirable in today's world. These include, for example, NPPF, MfS, and its companion guide Manual for Streets 2 ("MfS2").

3.2 NATIONAL PLANNING POLICY FRAMEWORK ("NPPF"):

3.2.1 The Government's commitment to sustainable development is emphasised in NPPF regarding transport related issues, this includes the basic land-use planning principle to:

"actively manage patterns of growth to make the fullest possible use of public transport, walking, and cycling and focus significant development in locations which are or can be made sustainable" (Core Planning Principles - Para 17).

3.2.2 In my view the emerging VWHDC Local Plan and its proposed major development options do not take into account this NPPF policy requirement as I will demonstrate later in **Section 5** of this Assessment.

3.2.3 With regard to promoting sustainable transport and reducing further congestion on highway links, NPPF also sets out quite clearly that: **"Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to**

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travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel." (Promoting Sustainable Transport - Para 29), and identifies that "Local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport." (Promoting Sustainable Transport - Para 30).

"Plans and decisions should take account of whether:

- the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- safe and suitable access to the site can be achieved for all people; and
- Improvements can be undertaken within the transport network that cost effectively limits the transport impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe." (Promoting Sustainable Transport - Para 32). This is a pivotal issue for the Parish Councils and residents who rely on the A420. I will discuss the technical elements in more detail later in this Assessment.

3.2.4 NPPF goes on to state that:

"Developments should be located and designed where practical to:

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- accommodate the efficient delivery of goods and supplies;
 - give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
 - create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
 - incorporate facilities for charging plug-in and other low emission vehicles;
- and
- **Consider the needs of people with disabilities by all modes of transport."**
(Promoting Sustainable Transport - Para 35)

3.3 MANUAL FOR STREETS

3.3.1 MfS was published by the DfT and DCLG in 2007, while its companion document MfS2 was published in 2010. Both documents give advice on the design of residential streets and roads, giving specific guidance on:

- Connections to surrounding areas;
- Connections through the site;

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- Building lines;
- Building heights; and
- Routes for utilities.

3.4 REGIONAL POLICY

3.4.1 The Regional Spatial Strategy ("RSS") for the South East to 2026 was formerly known as the South East Plan. The RSS was published in 2009 and set out a framework for development and investment in the region over the next 20 years. The RSS provides a strategic, upper tier, of planning guidance covering the region as a whole and complements national policy to provide an understanding of how the delivery of such policies can address specific challenges and opportunities in the South-East. The RSS is part of the statutory development plan for every local authority in the South-East which must each prepare Local Development Documents ("LDD") and Local Plans which generally conform with the RSS. Planning applications are to be considered against the provisions of the RSS

and relevant Local Plans. This document was along with many other Regional Strategies revoked in March 2012 under the Localism Act 2011. It is nevertheless of value.

3.4.2 The Government announced in the Coalition Agreement its intention to "rapidly abolish regional spatial strategies and return decision-making powers on housing and planning to local councils".

The objective was to make Local Plans, and where desired neighbourhood plans, the basis for local planning decisions.

POLICY T1: MANAGE AND INVEST

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Relevant regional strategies, local development documents and local transport plans should ensure that their management policies and proposals:

- i). **are consistent with, and supported by, appropriate mobility management measures,**
- ii). **achieve a re-balancing of the transport system in favour of sustainable modes as a means of access to services and facilities,**
- iii). **foster and promote an improved and integrated network of public transport services in and between both urban and rural areas**
- iv). **encourage development that is located and designed to reduce average journey lengths**
- v). **improve the maintenance of the existing transport system**
- vi). **include measures that reduce the overall number of road casualties**
- vii). **include measures to minimise negative environmental impacts of transport and where possible, to enhance the environment and communities through such interventions**
- viii). **investment in upgrading the transport system should be prioritised to support delivery of the spatial strategy by:**
 - a). **supporting the function of the region's international gateways and inter-regional movement corridors.**
 - b). **developing the network of regional hubs and spokes.**
 - c). **facilitating urban renewal and urban renaissance as a means of achieving a more sustainable pattern of development.**
 - d). **improving overall levels of accessibility.**

3.4.3 This key transportation policy T1 as above, has been retained in the short term and is referred to in the VWHDC Local Plan, which is correct process as it provides a policy overlap which helps underpin the government's objectives for sustainable transport in a hierarchical system. It is quite clear that this approach to development now places a greater emphasis on local planning and highway

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authorities to be more responsible and specific in delivering their emerging local plans in a way to meet local needs and specific requirements.

3.5 LOCAL POLICY

3.5.1 At a local level, the content, scope and methodology of any Transport Assessment ("TA") or Transport Statement ("TS") must be discussed and agreed with the relevant local authority ensuring it seeks to achieve sustainable transport patterns and limits the traffic impact on the local network in accordance with the Council's own adopted and relevant policies.

3.5.2 The current VWHDC Local Plan 2011 was adopted in 2006. This Plan provided approved policies as a guide to the future development and use of land within the area up until 2011. It is divided into a number of chapters covering specific topics including, traffic impact, public services and transport. The importance of the traffic and transport issues in contributing towards sustainable development and additional congestion levels is so fundamental that they are integrated throughout any Local Plan. Allocations for land uses such as these should be made, so far as it is practicable, in such a way that will minimise the need for motorised transport and avoid further local issues on already congested highway networks. Similarly, there are policies to strengthen and enhance the function and attractiveness of the town centres and local shopping centres, consistent with the objective of reducing the need to travel and the distance needed to travel by private car.

3.5.3 Any well drafted emerging local plan should set out the following objectives fully and how these aims and aspirations are to be funded, delivered and by whom, particularly at the Part 1 developmental stage.

Strategic Objective 8: Reduce the need to travel and promote sustainable modes of transport.

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Strategic Objective 9: Ensure new development is accompanied by appropriate and timely infrastructure delivery to secure effective, and wherever possible, sustainable transport choices for new residents and businesses.

Such a process at the very least provides the EIP Inspector, the politicians approving the plan, statutory consultees, and the general public with an opportunity of having at least some idea and understanding of what is likely to happen in their local communities and prepare responses as to the **'Soundness and ability of the plan to be delivered'** provide the necessary services to support development particularly in its relation to the Accessibility, Traffic,

Transport and infrastructure requirements necessary to support the development proposals around the district. At the time of preparing and summing this report, there is no Transport Assessment available from the Council on which to analyse or indeed provide a more rebuttal based response to the plan in line with the following key areas.

- **Ensure that public and other transport links effectively allow people to get to places of work;**
- **Reduce the need to travel;**
- **Maintain and enhance existing transport infrastructure; and**
- **Provide travel choices.**

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3.5.4 In my opinion the VWHDC Local Plan does not clearly demonstrate how the following general policies in relation to transport and new developments are to be secured. It does however make strong cross references to the Oxfordshire Local Transport Plan and the NPPF.

In considering proposals for new development, any council will have regard to:

- *The requirement to reduce the need to travel, especially by car;*
- *To ensure that the development is accessible by a variety of means of transport;*
- *The need to minimise the effects of traffic generation; and,*
- *The need to produce a Travel Plan.*

It is also stated that public transport facilities will be improved wherever the opportunity arises, and that new development will only be allowed where it can be well served by public transport or improves public transport services.

Policy TR 4 Pedestrians and Walking

The council will permit new developments if they include the following where they are currently lacking and their provision would be of benefit:

- *Safe and convenient pedestrian routes connecting the development to surrounding local area and facilities;*
- *Measures to protect and enhance public rights of way affected by development; and,*
- *Measures to ensure the safety of pedestrians.*

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Policy: TR 4 Cycling

In considering proposals for new development, the council will seek, where appropriate, improvements to facilities for cyclists through:

- *Safe, secure and covered cycle parking based on council standards; and*
- *The provision of adequate changing facilities, showers and lockers.*

Policy TR 4: Car Parking

It is stated that developments should provide car parking in accordance with maximum car parking standards.

Levels significantly less than the standards will be acceptable where:

- *The proposal is within the outer areas of Oxford; or Abingdon*
- *The proposal is in an area that is highly accessible by public transport/cycling; and;*
- *The proposal is within a short walking distance of a public car park.*

In addition, reduced car parking provision may be acceptable where a Travel Plan has been implemented.

3.6 VALE OF WHITE HORSE DISTRICT COUNCIL (VWHDC)/OXFORDSHIRE COUNTY COUNCIL (OCC) LOCAL TRANSPORT PLAN 2012-2030

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3.6.1 In carrying out this Assessment, it is broadly accepted by all WVV together with other listed parish council's, and CPRE that to ensure growth, economic development, and stability in the area some development in the Vale area needs to take place. What is of major concern to all is the relatively high proportion of development identified and allocated in this predominantly rural area. Following a number of Working Party meetings between OxCC, VWHDC and representatives of WVV I prepared a report outlining the minimum requirements necessary on the local highway network to support the additional traffic demand that major development proposal will have on the highway network. This work has been accepted by OxCC as the highway authority and the report is included as part of the highway and traffic requirements and accompanies this report as a follow up to inform the Inspector that work is ongoing and that there is a need for significant improvements on this strategic route. The Highway Authority are to use the findings in this report and are about to commission further independent advice by putting together a tender package for their own appointed consultants to examine in more detail the extent of the WVV concerns and come up with measured solutions and trigger points for facilitating improvements.

3.6.2 If residential development as set out in this emerging local plan development was restricted to a sensible limit of between 10% and 15% of the current village sizes then, in principle, there would be no major objections as this would stimulate growth in these areas at a representative level whilst still support local amenities. This would be so provided that, together with the sustainable development, infrastructure links were greatly improved as mentioned in paragraph 1.2 of the emerging local plan. There is a number of anomalies and sweeping statements contained within this plan which I will outline from Paragraph 4.16 later in this section.

3.6.3 Both VWHDC as the Local Planning Authority and OxCC as the local highway authority, have responsibility for the delivery and implementation of the Local Transport Plan ("LTP"). In line with

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national and regional policy objectives. the LTP is integral to this process as it follows a similar theme for

continuity, in that it promotes policies and measures to achieve improvements particularly for alternative modes of travel within the Council's geographical area and is a key strategy in which to align the Local Plan and generally for the basis of the traffic and transportation elements and foundations within the Local Plan.

3.7 KEY AREAS OF CONTENTION WITHIN PART 2 OF THE EMERGING VWHDC LOCAL PLAN 2029.

3.7.1 To assist the Inspector, at the stage 2 Matters and Questions sessions of the Inquiry and in particular

- Matter 7 – Supporting Infrastructure and Services
- Matter 10 – Strategy for Western Vale Sub Area
- Matter 13 - Viability, Delivery, Monitoring and Contingency

I have modified this report to demonstrate that with particular regard to Matter 7 that in its current form the A420 will not cope with the additional demand placed upon it. Matters 10 and 13 are integral to matter 7 and if the case for infrastructure demonstrates that the local network cannot cope without significant investment, then matters 10 and 13 cannot be achieved. The page numbers and chapters correspond with those set out in the Local Plan documents, which align quite clearly to the NPPF and the former Regional Spatial Strategy (The South East Plan) in terms of traffic management and sustainable transport and measures.

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3.7.2 I have only covered matters 7,10 and broadly 13 in terms of the Inspectors requests as part of the Local Plan Part 2 sessions. The lack of any joined up policy approach by both the VWHDC and OxCC up to now will without doubt have a significant effect on the Vale area with regard to traffic generation and sustainable transport issues. What is very clear is that the plan does not consider in any detail the traffic congestion, no real consideration has been given regarding the development effects of the adopted Swindon Local Plan which shares much of the same highway network and the detrimental effects this plan will have on both Vale and VWHDC Local Plan as a whole. It seems to indicate that cross boundary discussions are only now starting to be held in any detailed level, but the timescales for providing any sound policy are not in line with the local plan timetables, to the extent that development sites as allocated could have been relocated onto brownfield sites elsewhere within each Council's area. I have outlined below, some of the key concerns of WVV and others about these potential development allocations.

What is concerning in terms of delivery of the infrastructure measures required in support of all the emerging development allocations is that **that there are significant funding gaps of £415 million up to 2026 as quoted in the Oxford City Council C.I.L draft document. Without C.I.L funding it is my professional opinion that these gaps can never be filled as the local authorities no longer get transport settlements from national government.**

3.7.3 PRINCIPLES OF THE OXFORDSHIRE TRANSPORT STRATEGY AND ITS CONNECTION WITH SWINDON BOROUGH COUNCIL TRAFFIC IMPLICATIONS

3.7.4 The transport strategy for the future development aims of any emerging local plan provides the means to achieve the identified policy objectives by optimising the opportunity for access to/from any

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allocated site either now or in the future by non-car modes. This approach is in full accordance with all local, regional and national policies. Accessibility of any of the allocated sites for those travelling on foot and by cycle is set out in Section 5 of this report. The current accessibility of the allocated sites by public transport is also outlined in Chapter 5. The proposed development plan should also take into account the needs of the so-called “mobility impaired”.

3.7.5 It is considered that the approach for this development plan must be cohesive with good connectivity to/from the centre of Oxford, other major conurbations, and the surrounding area, for all modes of transport, motorised and non-motorised. These measures should be very real and very deliverable from any of these site allocations and would comply fully with the underlying principles set out in MfS & MfS2 and the VWHDC Local Transport Plan.

3.8 SUMMARY

3.8.1 The proposed Local Plan development proposals, as drafted, are not compliant with local and national policy for a number of reasons including but not limited to:

- Provision for access into and throughout the WVV area namely, the A420, A415 and the A417 B4000 will be extremely congested for all road users. Apart from the traffic lights at the Police HQ, the only break in traffic flow on the A420 is at the roundabout junction with the Sainsbury's store when the pedestrian crossing is initiated.

This was observed during the morning peak when vehicles waited between 3-5 mins to access the roundabout and continue with their journey from Thornhill Road. When this occurs cyclists and pedestrians can proceed safely to cross.

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- The development plan does not adopt the sustainable approach it seeks to project and which is specifically highlighted in both local and national policy as being absolutely necessary within the planning process.
- Its emerging potential development is not located close to town centres, efficient public transport facilities, and the surrounding residential areas will almost certainly need to travel by private car as this route is quite clearly an extensively used commuter route. The traffic impact of the proposed developments close to or impacting on this corridor will not conserve energy nor help limit the emission of greenhouse gases. On the contrary, the impact of additional significant traffic flows will only further degenerate air quality.
- The location of the proposed developments will in the WVV view, NOT promote sustainability by reducing the number of car trips on this link as there is no promotion of sustainable modes of travel such as walking, cycling, and the use of public transport as public transport services in this area are particularly poor. There is no mention of the effective use of Travel Plans. A full highway assessment should be carried out before sites are put forward for allocation rather than afterwards; and
- The level of car parking throughout the development proposals needs to be balanced to ensure a level of restraint, and thus promote alternatives to car use.

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3.8.2 Furthermore, as set out in the following section, good pedestrian and cycle linkages to a number of locations, facilities and public transport services all ensure that the development is sustainable as required by national and local policy.

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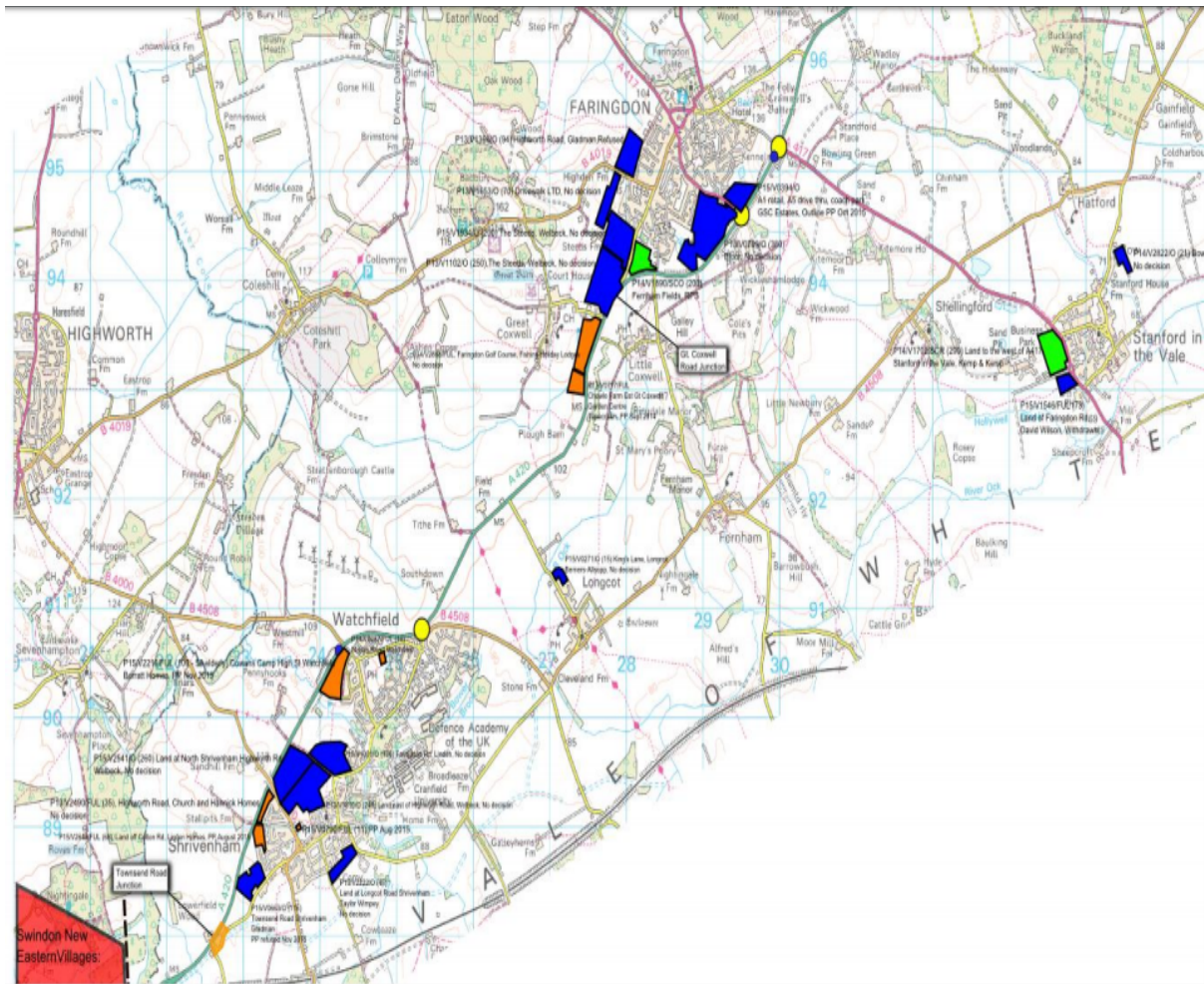
**4.0 LOCAL PLAN DEVELOPMENT PROPOSALS AND COMMITTED DEVELOPMENT
AFFECTING THE HIGHWAY LINK A419/A420 WHITE HART ROUNDABOUT – A415.**

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4.1.1 Overview

4.1.2 The emerging Vale of White Horse (VWHDC) Local Plan 2031 is still being considered at the Examination in Public part 2 stage of the local plan process. Swindon Borough Council (SBC) Local

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Plan 2026, has now been adopted. While I have not focused on the planning issues, I have examined both local plan documents, in terms of policies that have a direct bearing on the traffic and transportation aspects of the development plan process. There is further a significant number of planning applications already in the system and some that have recently been approved that will have a marked effect on the already congested A420 strategic highway route between Swindon and Oxford. This view on congestion is readily accepted and discussed by both authorities within the contents of the emerging plans. I will cover this in greater detail in section 6 of this report.

4.1.3 To provide a more robust appraisal, I have looked planning application No P15/V2541/O for developments at North Shrivenham, and examined a number of Transport Assessments of the major applications in the VWHDC planning portal relating to the impact of these developments in relation to matter 10. I have not seen any suitable scheme designs that would help reduce the level of congestion or which have considered in detail any realistic attempt to deal with sustainable transport measures to accompany these policy requirements. This Assessment will identify and thoroughly examine the key areas of these policy shortcomings and will highlight the key areas of the high levels of road congestion already widely accepted by both the VWHDC and OxCC. On this basis, I fully agree the position of OxCC as the Highway Authority, in that the improvements suggested by the developers will not be satisfactory in terms of helping the overall traffic operations at the local junctions into Shrivenham from/to the A420.

4.1.4 To put some further highway related context into these proposals, in general terms the key overriding geometric features of the A420 road are as shown below. However, at key junctions the

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geometric layouts are greater to accommodate the additional traffic and turning movements. It is important to identify these characteristics as they will become more apparent later in Section 6 when a traffic flow analysis will be provided and demonstrate the high capacity levels that already exist and the effects on the route of all the impending and proposed development will:

- 5.5m, 6.5 and 7.3 variant carriageway widths
- No footways along major lengths of the road
- varied corner radii at its junction with A419(T) Road,
- generally, there is very good forward visibility when travelling in each direction (SSD)
- There are no fully integrated or segregated cycleway provisions other than around junctions
- Full Traffic Signalised junctions located at Police HQ.

4.1.5 This Assessment is based on discussions with WVV and a number of other parish councils each of which has major traffic and congestion concerns about the extent of the development proposals on this congested link and the access roads to/from specific villages as identified earlier in my report. Traffic count surveys at have been provided by OxCC at various points along the route. (Appendix 1). The traffic survey represents Annual Average Daily Traffic flows (AADT). This information will be used

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to determine the flows currently and the net effects on the link when all development trip rates are applied together with national growth up to the end of the planned period. This work will clearly demonstrate that this road will be operating over capacity and does not conform with current national policy relating to link capacity. This element of the Assessment is covered in more detail in section 6. Furthermore, I have outlined below that the lack of any credible sustainable transport measures will only worsen the matters significantly for residents and current regular users of this road as part of their everyday business requirements.

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4.2 ACCESS BY ALTERNATIVE MODES OF TRANSPORT – KEY CORE POLICIES

VWHDC Local Plan - Core Policy 29: Promoting Sustainable Transport and Accessibility

I have highlighted the key elements of this policy that are critical to the traffic impact on the A420 link. VWHDC has confirmed it will work with Oxfordshire County Council and others to develop their sustainable aims as set out below:

- i). actively seek to deliver the transport infrastructure and measures which improve movement in the Science Vale UK area as identified in the County Council's Local Transport Plan's ("LTP"), Science Vale UK Area Strategy and the Science Vale UK Integrated Transport Package, in partnership with South Oxfordshire District Council
- ii). actively seek to ensure that the impacts of new development on the strategic and local road network are adequately mitigated
- iii). support measures identified in Oxfordshire County Council's LTP including the relevant local area strategies for the district
- iv). support improvements for accessing Oxford
- v). ensure that transport improvements are designed to minimise effects on the amenities of the surrounding area

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- vi). encourage the use of sustainable modes of transport and support measures that enable a modal shift to public transport, cycling and walking in the district

- vii). promote and support improvements to the transport network that increase safety, improve air quality and/or make our towns and villages more attractive

- viii). ensure adequate parking is delivered on new developments in accordance with Oxfordshire County Council's published standards

- ix). all developments that generate significant amounts of movement must be supported by an appropriate transport assessment or statement and travel plan that is agreed by Oxfordshire County Council, and

- x). promote electronic communications allowing businesses and residents to operate throughout the district and to provide services and information that reduce the need to travel.

4.3.1 As previously mentioned this emerging plan relies on the Oxfordshire Local Transport Plan (LTP) 2030 and in particular the LTP policy **TR4** which provides the transport sustainability issues, measures and method of delivery supporting alternative modes of transport to help reduce the reliance of private car use within the County. I have covered the specific issues relating to pedestrian, cycling and public transport aims and provided a view on Mobility impaired road users. The needs of those with mobility impairment are an important component of emerging development plans.

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4.4 SUMMARY

4.4.1 In summary, it is the WVV Consortium view that the emerging VWHDC Local Plan is not cohesive. It makes wide and generalised statements but fundamentally it fails to recognise in any detail or with any substance the need to have regard to effective and sustainable travel measures. It is all 'if', 'but' and 'maybe' generic sweeping statements and does not comply with either the NPPF, its own core policy 29, or the recently approved Local Transport Plan Policy TR4.

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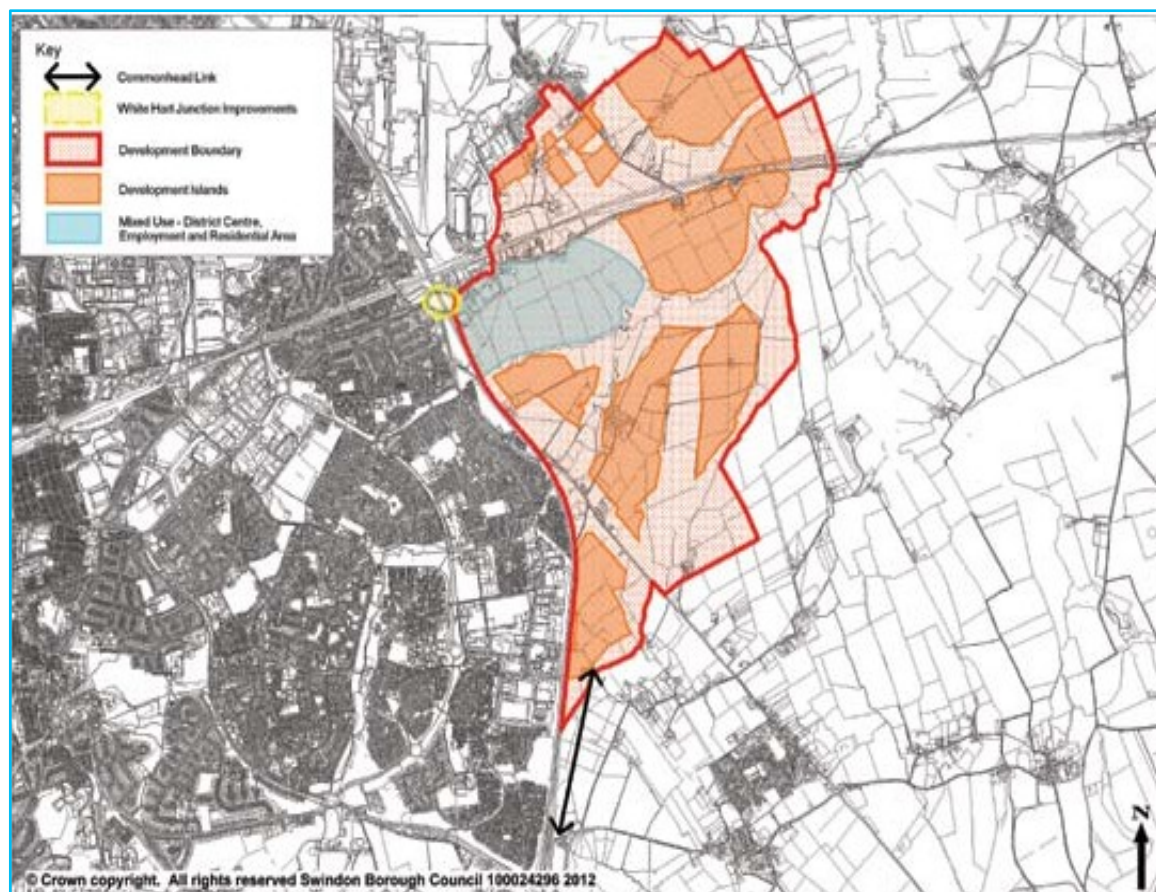
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4.5 KEY ISSUES FROM THE SWINDON LOCAL PLAN 2026 THAT HAVE AN EFFECT ON THE A419(T)/A420 JUNCTION TO THE A415.

Figure 1 Development Area of Major concern



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4.5.1 It is accepted that the Swindon Local Plan is now adopted. Many of the parish councils listed at the beginning of this report did make representations to SBC regarding the traffic and transportation issues on the local highway network that will have a significant impact on them and feel quite strongly that their concerns, based on their own experience of using the A420 have not been given due consideration. I have examined the transport and sustainable transport policies within the emerging Swindon Borough Council ("SBC") Local Plan.

4.5.2 I have set out below the key areas of concern in terms of delivery of any infrastructure improvements. There appears to be no mechanism in the plan to identify the build volumes which trigger infrastructure provision although SBC admits the need for infrastructure. It has been confirmed in working party meetings with SBC officers and with Wanborough, Bishopstone, and Bourton parish council's, that several thousand homes could be built prior to the implementation of the proposed and so-named "Diamond Interchange" at White Hart.

4.5.3 To add to local concerns SBC have emphasised there will be no 'relief road' to Commonhead and that traffic must be 'managed' via the existing road network. It is important to emphasise that within their transport plan they have taken account of the 'Green-bridge' to Covingham for carrying public transport (although we know anecdotally that SBC are planning to change this to a pedestrian only crossing. This needs testing in cross examination at the EIP.

4.5.4 The key concerns of the local parish councils and local residents are about the level and scale of development being proposed in the East of Swindon as indicated in Figure 1 and the traffic impact on the A419(T), A420, M4 junctions 15 and 16 and the local road network this proposal will have. As with the WVHDC, SBC readily accept that there is congestion on this network now and as a result, many drivers are using the surrounding village roads as 'rat runs' particularly in the peak times to try and

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avoid queuing. So far as is so far known, these “rat runs” have not been formally identified and mapped.

4.5.5 Due to the extensive scale of the proposed development being put forward for allocation in the Swindon Local plan in Policy NC3: New Eastern Villages - including Rowborough and South Marston

Village Expansion, there are major concerns about the traffic effects this development will create. In the absence of any major infrastructure improvements it is likely that the M4 junction 15 and 16 together with the A419 (T) and A420 local highway routes will be congested for long periods of the day.

4.5.6 On my site visits to this area it was apparent that significant traffic queuing problems also occur to other junctions in the locality. One such example is the 5 arm roundabout at Greenbridge, Swindon from the Oxford Road which is already congested but will experience far greater congestion if ‘traffic flow’ is increased from White Hart. This is a principal route into Swindon Town Centre and one of the suggested Rapid Transport System routes.

4.6 Policy NC3: New Eastern Villages - including Rowborough and South Marston Village Expansion

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Land to the East of the A419, as defined on the Proposals Map, is allocated for a mixed-use development. The form of the development shall comprise a series of new distinct villages and an expanded South Marston village. The development shall provide an overall average density of 40 dwellings per hectare; comprising of:

- **About 8,000 dwellings at the New Eastern Villages (South of the A420);**
- **About 1,500 dwellings at Rowborough (North of the A420), and**
- **500 dwellings at South Marston.**

Sustainable transport links including:

- A rapid transit link to Swindon Town Centre from the Eastern Villages serving and through the district centre as part of phase 1 of the development;
- Additional public transport services to connect with Swindon and internally within the development;
- An improved gateway junction at White Hart to manage additional demand and deliver high quality public realm;
- Improvements to the Oxford Road/Drakes Way and Covingham Road/Dorcan Way transport corridors;
- A green bridge across the A419 near Covingham Drive to provide for walking, cycling, and public transport;
- A new road link to the Commonhead Roundabout;
- A new road link under or across the Bristol to London railway line connecting the development north and south, and new and/or improved accesses to the A420 for proposed residential and employment uses;
- A 1000 (3ha.) space Park and Ride site; and

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- Measures to minimise rat-running through existing adjacent villages and east Swindon.

4.6.1 It is quite clear that the proposals outlined above are extensive and are designed to meet the aims of Theme 4 as part of the strategic objectives of the SBC local plan. As with the VWHDC emerging plan, I have not seen any suitable scheme designs that would help reduce the level of congestion or which have considered in detail any realistic attempt to deal with sustainable transport measures to accompany these policy requirements.

4.6.2 It is also understood that there will be no separate bus lanes constructed to give the bus a 'free flow' lane into the centre. Therefore, buses will still be caught up in the congestion and there will be no incentive to switch travel modes.

An example of this is in Liverpool where priority bus lanes were provided on a congested route into the city they have now been removed as the service is poorly supported with low levels of patronage since it began operation.

4.6.4 In terms of modal shift, the consultants JMP who prepared the Swindon Transport Strategy have made some very optimistic predictions that up to 15% of people will transfer to bus travel as part of this policy. From experience in other areas the maximum levels being achieved is around 3 - 5%. The figure of 15% would also be a key factor in terms of vehicle trip rates they have used in the Transport Strategy of around 0.52, rather than a recognised level of 0.74 which I have used in section 6 of this Assessment.

4.6.5 What is more concerning is that reference to congestion is made frequently in the emerging SBC Local Plan, but no indications of what the congestion levels are at present. There is evidence now of rat running through the local villages due to this congestion. This problem will be worsened if these

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proposals are allowed to proceed. The officers at SBC have already confirmed that several thousand house could be built and occupied before any relief measures are fully implemented.

4.7 SUMMARY

4.7.1 In summary the due to the adopted SBC Local Plan position problems and shortcomings will the same as part of VWHDC Local Plan in that it fails to provide any information about how the measures outlined above are to be delivered, funded or any trigger point for initiation Points to be addressed to the Inspector under Matter 13. It also makes ambitious generalised statements but it fails to recognise in any detail or with any substance what is required to provide sustainable travel measures. The 15% modal shift is too high and therefore, unrealistic in an area that is widely recognised as having high car usage (Matters 7 and 10). This does not comply with either the NPPF or indeed OxCC core transport policies and as it stands does not have regard to Paragraph 147 of the NPPF as without significant improvement any additional traffic demand must be classed as Severe.

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5.0 SUSTAINABILITY

5.1 PEDESTRIAN AND WALKING ACCESSIBILITY

5.1.1 As previously stated, where pedestrian access is concerned, the general consensus of an acceptable walking distance is considered to be a maximum of 2km which under normal walking conditions takes around 20mins, as stated within the former planning policy PPG13. Although the guidance is now superseded the current policies such as NPPF and design guides still follow this statistic.

5.1.2 It is well established and widely accepted that walking is the healthiest mode of travel at a local level, and offers the greatest potential to replace short car trips, particularly under 2km. Many guidance notes and memoranda suggest a preferred maximum distance of 2000m for walk commuting trips. A 400m walking distance equates roughly to a time of approximately 5 minutes, based upon average walking speeds.

5.1.3 MfS make reference to what is termed the 'walkable neighbourhood' as set out below and this view is fully supported in MfS2.

"Walkable neighbourhoods" are typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot.

There are very limited local facilities on the A420 route within a reasonable walking distance from the proposed development plan allocation sites as there are no footways on this route that provide

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connections other footways. The location of the strategic housing and employment sites allocated in the local plan for Faringdon are a clear example that they would not present opportunity for residents and employees alike the opportunity to walk to local facilities within 5 minutes, and comply with the view held within the above mentioned MfS1 and MfS2 objectives. There are facilities at the Sainsbury's superstore at Gablecross, which are located several miles away.

5.1.4 In summary, the facilities as mentioned above are not all located within a convenient practical walk of the proposed development sites. The A420 in the vicinity of these two example sites does not have footways or street lighting.

5.1.5 The existing pedestrian facilities in this area are very sparse as it is predominantly rural in its characteristics. A revision of the Plan is necessary to ensure that appropriate pedestrian facilities are integrated.

5.2 CYCLING ACCESSIBILITY

5.2.1 Cycling is widely recognised as a sustainable, healthy and environmentally friendly form of transport. As discussed, cycling is identified in the transport section under Policy TR 4 of the Local Transport Plan. PPG13 also emphasised that cycling also has the potential to substitute for shorter car trips, particularly those less than 5km a 20minute cycle time. If these distances are maintained they could form part of longer journeys by public transport. With regard to cycling provision in the local area, there are no cycle routes around the proposed Local Plan allocated sites.

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5.2.2 In addition, I cannot find in any policy documentation used for the purpose of developing the emerging local plan anything that promotes a number of highways in the area as on-street cycle routes. These routes in principle should run along the majority of principal highway networks. The Local Plan does not clearly demonstrate this potential or its associated facilities. The A420 does not have a specific cycle routes designation and is not close to any part of the National Cycle Network route.

5.2.3 In summary, the destination opportunities for residents and business users within a 3km cycle ride of the potential development sites, should any of the proposed allocated sites be approved, are very poor and do not permit cyclists and pedestrians alike the opportunity to access safely a full range of amenity and employment locations within easy access of the A420. The proposed development sites do not include the introduction of pedestrian/cycle links between the sites and the surrounding infrastructure, within the local development framework for the Western Vale area of the VWHDC area.

As such and as previously identified in section 3 of my report Local Plan is the delivery is flawed as it does not comply with the Oxfordshire Local Transport Plan to 2030, which has been adopted by VWHDC council particular reference to policy **TR 4**.

5.3 PUBLIC TRANSPORT ACCESSIBILITY

5.3.1 Bus provision within the vicinity of the route has been examined. Guidance published by the IHT 'Planning for Public Transport in Developments' (1999), recommends that the preferred maximum walking distance to a bus stop should be 400m, approximately equating to a five-minute walk.

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5.3.2 This is supported by advice given by the DfT 'Inclusive Mobility', which suggests that the maximum acceptable walking distance to public transport facilities from any development is some 400m and this distance should be reduced by 10 metres for every 1 metre of gradient rise or fall. The bus stops on the A420 link are located more than the prescribed 400m from any of the proposed development sites.

5.3.3 The bus service 65 and 66 provides half hourly peak hour services to the major hubs of Oxford and Swindon. Although at the time of writing this report OxCC was considering an additional 4 services in a limited attempt to improve traffic congestion on the A420 link, with additional services from Faringdon and Shrivenham. This village service 66 combines to provide a service on a 120-minute cycle in both directions, Monday to Saturday in off peak hours.

5.3.4 The VWHDC Local Plan part 1 states in 2.24 that in more rural parts of the Vale, away from main transport corridors, bus services are not sufficient to provide a meaningful alternative to the car. It is also stated as a key objective in the sustainable transport and accessibility objectives of the Local Plan that the securing of developer contributions from new developments to improve more sustainable modes of transport is desirable through emerging CIL policy. **This is because car ownership in the VWH area is recognised within the VWH local plan as being relatively high. And this area being of a particular high car usage rate compared to the rest of the Council geographical area.**

5.4 SUSTAINABILITY SUMMARY

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5.4.1 VWHDC does not comply with its own prescribed and adopted transport policy **TR4** as set out in the OxCC Local Transport Plan 2030. There is reference to developers of individual sites having to make provision through Transport Assessments (TA) and Transport Statements (TS) with attached travel plans, but that is far too late as there could be other third party reasons as to why they cannot be delivered. At this stage all relief measures should be clearly defined and identified. Nothing is set out. The VWHDC plan fails to meet these policy objectives adequately or indeed at all.

5.4.2 PEDESTRIANS

5.4.3 Good pedestrian connectivity between the proposed residential and employment developments and the surrounding area is a key component of any local plan and in particular is a key area in a development transport strategy. This is converted into practice by a combination of on-site development layouts that recognise pedestrian desire lines and provides enabling pedestrian facilities e.g. footways, roads that discourage high speeds, and a sense of place that is safe for pedestrians. Pedestrian links between any of the proposed sites (approved or allocated) and the surrounding area should be set out and information should be provided and/or enhanced as part of this local plan.

5.4.4 There is no evidence at all within this plan about good pedestrian links and it is my view that the VWHDC is not complying with its own prescribed and adopted transport policy **TR4** as set out in the Oxfordshire County Council Local Transport Plan 2030. To be fair, there is reference to developers of individual sites having to make provisions through Transport Assessments (TA) and Transport Statements (TS) with attached travel plans, but in my professional opinion that is far too late in the planning process, as there could be other third party reasons as to why mitigation measures cannot be delivered. It is vitally important at this stage that all improvement measures should be clearly defined and identified. Nothing is set out and in my view VWHDC has failed to meet these policy objectives fully.

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5.5 CYCLING

5.5.1 As above, there are no specific details of any cycle links on this route proposed by this local plan. This is covered in more detail below in this section of my report. In essence, the local plan does not demonstrate the promotion and connectivity between the proposed local plan sites and the surrounding areas. Due to the sites' close proximity to this route, it thereby offers no real encouragement for residents or business employees to choose cycling as an alternative mode of travel and transport as there is no safe and secure network available.

5.5.2 The local plan document and topic papers relating to transport and infrastructure mention, sustainability constantly but with no positive recommendations. Again as mentioned above in Paragraph 3.3 this causes the Local Plan to fail to comply with Policy **TR 4** of the Oxfordshire County Council Local Transport plan 2030. A plan of the National Cycle Route is attached as appendix 9 to this Assessment to demonstrate the remote locations that form the principal development areas.

5.6 MOBILITY IMPAIRED ROAD USERS

5.6.1 The needs of those with mobility impairment are an important component of emerging

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development plans. This category of road user is mentioned in the new NPPF in that, the detailed considerations of development will undertake to discuss the facilities to be provided to assist the mobility impaired, taking account of current guidance and specifications. Again as part of my examination of the traffic effects of the emerging Local Plan there are no clear definitions regarding measures for this user group. The Local Plan on this basis fails to meet the fundamental policy guidelines as set out in the National Planning Policy Framework.

6.0 TRAFFIC IMPACT ON A419/A420 – A415 STRATEGIC LINK

6.1 TRAFFIC GENERATION

6.1.2 A vital component of any emerging development plan is the impacts the additional traffic generated will have on the local highway network. It is important when planning any major development proposals that the highway authority have some form of district wide Traffic and Transportation Assessment that informs the Local Planning Authority of the current traffic levels and, more so, the predicted traffic levels the plan will generate. **This Assessment is intended to set the base line traffic effects that both Local Plans' traffic generation will have on the A420. More detailed traffic**

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modelling will be prepared and presented in evidence to each EIP on behalf of WVV and other parish council's and organisations who have already made representations to each authority.

6.1.3 In order to assess any potential impact that may result from the proposals on the surrounding local highway network, it is necessary to forecast the number of trips that would be generated by the proposed Local Plan development proposals as well as the current large scale development planning applications on deposit as set out in **Table 3** below. To record, analyse and assess the overall traffic implications on the A420, I have broken down the data gathering process into three distinct major components

- Current situation with permitted, submitted and likely development proposal prior to the emerging VWHDC and SBC Local Plans;
- The traffic and transport impact with all allocated sites through the Local Plan traffic added to the network link; and
- Total cumulative effect on the network by adding all traffic together with natural growth.

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6.1.4 To validate the traffic impact I have used the Trip Rate Information Computer System (TRICS) 2009(b) database, version 6.4.1, to establish the associated trip rates during the weekday AM and PM peak periods. Sites in Greater London, Ireland, Scotland and Wales were removed in order to retain a representative sample. Averages of the 85% trip rates were extracted to ensure a reasonable level of statistical confidence.

6.1.5 TRAFFIC FLOW DATA GATHERING.

6.1.6 To address the traffic situation on the A420 with regard to the VWHDC Local Plan, I have used the following method. To signify that the current peak hour traffic flows are an accurate representation of the traffic, I have used the traffic count data supplied by Oxfordshire County Council. These vehicle counts have been used to benchmark the current traffic flow rates. To obtain a total traffic flow on the link, I have added all current planning application development and Local Plan development sites within the Western Vale area as mentioned in **Paragraph 6.1.2** above and made some slight adjustments to represent a modal shift of road users to alternative measures. I have added all the predicted traffic flows from the proposed developments in the East of Swindon as outlined in section 4 of this Assessment. A request was made to Wiltshire County Council for traffic flow data on the A419 (T) and at the time of writing this Assessment no traffic count data has been provided. The purpose of this exercise was to determine the current traffic flows on the local road network.

6.1.7 It can be seen from the tables in **Appendix 3** of this Assessment that the A420 carries large amounts of existing vehicle movements. At present, the total two way 12 hours' flows are around 18000 per day, Monday - Friday. Of this daily total some 1800 travel on the network in the AM and PM peak

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times. This equates to around 10%, which is not uncommon on roads of this type. It should also be noted that there is also a high HGV percentage as shown below in **Tables 6 and 7**. To these actual traffic flow rates, I have added the simulated trip rates of the proposed trip generation of all VWHDC Local Plan residential allocation sites that have an effect on this link. These trip rates were obtained from the TRICS database, from the category residential 50-250 houses use class. The derived 85% trip rates and trip generation are summarised in the following tables.

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6.1.8 In addition to this, I have also reviewed a number of Transport Assessments submitted in support of the following planning applications as shown in **Table 3**, all have used the TRICS rates correctly in these cases to represent the actual vehicle trip rates per unit and they do reflect the current national statistics.

TABLE 3

**RECENT LARGE SCALE DEVELOPMENT PLANNING APPLICATIONS APPROVED AND/OR
AWAITING A DECISION**

Planning Application No	Brief Description of Proposal
P12/V00324/FUL	'Townsend Road' – development of 31 residential dwellings by Linden Homes
P12/V2582/FUL	'Land at Highworth Road' – development of 36 residential dwellings by Blue Cedar Homes
Ref: P13/V0399/O	'Land off Colton Road' – development of up to 68 residential dwellings by Manor Oak Homes
APPLICATIONS COUNCIL MINDFUL TO APPROVE	
P13/V2490/FUL	Land off Highworth Road, Shrivensham' – development of 35 residential dwellings by Kemp & Kemp
Ref: P13/V1810/O	'Land to the East of Highworth Road' – development of 240 residential dwellings by Welbeck Strategic Land LLP
APPLICATIONS RECENTLY SUBMITTED	

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Ref: P15/V/0660/FUL	'Land off Townsend Lane' – development of 116 residential dwellings by Gladman Developments
Ref: P15/V/1091/O	'Land at Farrington Road'– development of 136 residential dwellings by Linden Homes
Ref: V15/V/0790/FUL	'Land Adjoining 3 Recreation Ground' – development of 11 residential dwellings by The Viscountess Barrington's Homes.

6.1.9 The other large scale development applications recently submitted in the local area have all used the proportionate trip rates of around the 0.60-0.68 mark, which in my view is representative of the current situation. However, it is clear from the submitted TA from Peter Brett Associates Ltd for Planning Application P15/V2541/O on land at North Shrivenham that they have not taken into account in their assessments and Picardy Models any cross boundary traffic that will be generated by the EV proposals in the east of Swindon.

6.1.10 Notwithstanding all the proposals set out in the Local Plan for development up to 2029, there is at present a number of recently submitted applications within the Vale area that will have major effects on the local highway network and in particular the A420 corridor. Of the proposed development sites i.e. all residents living on the proposed Local Plan development during the peak periods, this would not generate any estimated cycle trips in each of the AM and PM peak periods and no walking trips.

6.1.11 In addition to the above and to identify the full impact, this report also considers the traffic effects of the proposed Eastern Villages and employment park proposals just across the county border in the SBC area.

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6.1.12 There is a fine balance in terms of theoretical highway capacity and actual operational capacity. The theoretical aspect is that the maximum operational capacity depends on fixed lane widths along a given route and it is generally accepted that these give a broad appraisal of the situation. However, on the A420 for example there are variant lane widths that have a direct operational capacity effect in terms of queues and delay. The operations in and around junctions are modelled using approved DfT computer modelling techniques such as Arcady, Picardy and Oscady to predict the actual delay and queues hence the Ratio Flow Capacity is then used to identify what spare operational capacity is available.

6.2 CAPACITY EFFECTS ON THE A420 LINK RURAL LINK USING TA 46/97.

6.2.1 CAPACITY = [A - B * Pk%H]

Where, Pk%H is the percentage of 'Heavy Vehicles' in the peak hour. The term 'Heavy Vehicles' are vehicles with an axle weight of 3 tonnes or greater.

6.2.2 Both A and B are predetermined figures, in this case this capacity calculation is derived from the Department for Transport Technical Guidance Note TA 46/97.

6.2.3 A = 1380 and B = 15.0. In tables above, I have already determined the HGV traffic on the road link is 11 - 18%. Therefore, for the rural section of the A420 road, the capacity is around **1250** vehicles per hour in one direction. Therefore, it can be assumed that the theoretical capacity of the two-ay operational flow could be around **2500** per hour. However, two key points emerge here. At Accord Bridge the carriageway widths are reduced 3.7m in each direction. and there are other sections of carriageway of which capacity levels are not in question

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6.2.4 From the obtained count data it can be clearly seen that including all the associated traffic using the route, this road at present operates at around 70-76% of its full design capacity which includes all the HGV traffic flows along the length of the link. This is a view accepted by both VWHDC and Oxfordshire County Council (as Highway Authority) in all the currently available public documents that congestion is a key concern when developing these plans.

6.2.5 As the western section of the A420 is within the 'built up' area I have also used the Department of Transport Technical Guidance Note TA Tables 2 and 3 (TA 77/99) – Traffic Capacity of Urban Roads as shown below: -

TABLE 4 - EXTRACT OF TABLE 2 OF DEPARTMENT OF TRANSPORT TECHNICAL NOTE TA 79/99

	ROAD TYPE				
	Urban Motorway	Urban All-purpose			
	UM	UAP1	UAP2	UAP3	UAP4
General Description	Through route with grade separated junctions, hardshoulders or hardstrips, and motorway restrictions.	High standard single/dual carriageway road carrying predominantly through traffic with limited access.	Good standard single/dual carriageway road with frontage access and more than two side roads per km.	Variable standard road carrying mixed traffic with frontage access, side roads, bus stops and at-grade pedestrian crossings.	Busy high street carrying predominantly local traffic with frontage activity including loading and unloading.

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Speed Limit	60mph or less	40 to 60 mph for dual, & generally 40mph for single carriageway	Generally TA 46/9740 mph	30 mph to 40 mph	30mph
Side Roads	None	0 to 2 per km	more than 2 per km	more than 2 per km	more than 2 per km
Access to roadside development	None. Grade separated for major only.	limited access	access to residential properties	frontage access	unlimited access to houses, shops & businesses

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Parking and loading	none	restricted	restricted	unrestricted	unrestricted
Pedestrian crossings	grade separate	mostly grade separated	some at-grade	some at-grade	frequent at-grade
Bus stops	none	in lay-bys	at kerbside	at kerbside	at kerbside

TABLE 5 - EXTRACT OF TABLE 3 OF DEPARTMENT OF TRANSPORT TECHNICAL NOTE TA 79/99

		Two-way Single Carriageway- Busiest direction flow (Assumes a 60/40 directional split)									Dual Carriageway			
		Total number of Lanes									Number of Lanes in each direction			
		2				2-3	3	3-4	4	4+	2		3	4
Carriageway width		6.1m	6.75m	7.3m	9.0m	10.0m	12.3m	13.5m	14.6m	18.0m	6.75m	7.3m	11.0m	14.6m
Road type	UM	Not applicable										4000	5600	7200
	UAP1	1020	1320	1590	1860	2010	2550	2800	3050	3300	3350	3600	5200	*
	UAP2	1020	1260	1470	1550	1650	1700	1900	2100	2700	2950	3200	4800	*
	UAP3	900	1110	1300	1530	1620	*	*	*	*	2300	2600	3300	*
	UAP4	750	900	1140	1320	1410	*	*	*	*	*	*	*	*

Table 2 Capacities of Urban Roads

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One-way hourly flows in each direction

- Notes:
1. Capacities are in vehicles per hour.
 2. $HGV \leq 15\%$
 3. (*) Capacities are excluded where the road width is not appropriate for the road type and where there are too few examples to give reliable figures.

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6.2.6 It can be seen from this theoretical relationship between the traffic flow capacities on the A420 that the full operational capacity in each direction of flow is somewhere between 1020 and 1320 in the peak hour. These flows are direct link flows and do not represent capacity issues on the major junctions.

**TABLE 6 - CURRENT TRAFFIC FLOW SUMMARY – WEEKLY AVERAGE OF EXISTING AM PEAK
TRAFFIC ON A420 LINK (August 2015)**

Traffic flow	All Traffic North	All Traffic South	Total
AADT	1052 (53%)	730 (47%)	1782
HGV content	15%	18%	

**TABLE 7 - CURRENT TRAFFIC FLOW SUMMARY – WEEKLY AVERAGE OF EXISTING PM PEAK
TRAFFIC ONTO A420 LINK (August 2015)**

Traffic flow	All Traffic South	All traffic North	Total
AADT	955 (46%)	778 (54%)	1773
Trip flows	11%	14%	

6.2.7 It can be seen with the current link flow rates that in the morning peak period, for the traffic heading west and in the evening peak heading east, the A420 is already above Department for Transport's theoretical operating capacity for a route of this nature.

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6.3 ADDITIONAL DEVELOPMENT TRAFFIC WITH DIRECT IMPACT ON THE A420 IN WESTERN VALE AREA.

6.3.1 To determine the additional development traffic likely to have a direct impact on the route I have interrogated the TRICS database to obtain realistic and robust vehicle trip rates for the new major housing and employment developments currently being considered and those strategic sites mentioned in the VWHDC emerging Local Plan. **Tables 8 and 9** below are the likely vehicle trip rates these proposals will generate onto the network at peak times.

TABLE 8 - SUMMARY OF TRIP GENERATION FOR PROPOSED RETAIL DEVELOPMENT PER 100m2 OF GROSS FLOOR AREA (GFA).

Peak	Trip Rates		Total	Total flow
	Arrive	Depart		
AM	8.40	7.69	16.00	64
PM	11.00	10	21.00	84

TABLE 9 - SUMMARY OF TRIP GENERATION FOR PROPOSED RESIDENTIAL UNIT

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Peak	Trip Rates	
	Arrive	Depart
AM	0.16	0.45
PM	0.43	0.25

6.3.2 When using the above mentioned vehicle trip rates the additional predicted demand onto the A420 can be determined as set out below in the following tables.

**TABLE 10 - TRICS TRIP RATE SUMMARY – AM PEAK FOR MAJOR PLANNING APPLICATIONS
DEVELOPMENT TRAFFIC AS ABOVE ONTO A420 LINK IN THE WESTERN VALE**

Land Use	Unit	Arrivals	Departures
Residential	Housing Unit	0.16	0.45
Trip Rate	469	75	211

**TABLE 11 - TRICS TRIP RATE SUMMARY – PM PEAK FOR MAJOR PLANNING APPLICATIONS
DEVELOPMENT TRAFFIC ONTO A420 LINK IN THE WESTERN VALE**

Land Use	Unit	Arrivals	Departures
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Residential	Housing Units	0.43	0.25
Trip Rate	469	201	117

**TABLE 12 - TRICS TRIP RATE SUMMARY – AM PEAK FOR WESTERN VALE AREA OF LOCAL
PLAN DEVELOPMENT TRAFFIC AS ABOVE ONTO A420 LINK (RESIDENTIAL USE)**

Land Use	Unit	Arrivals	Departures
Residential	Housing Unit	0.16	0.45
Trip Rate	673	108	303

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**TABLE 13 - TRICS TRIP RATE SUMMARY – PM PEAK FOR WESTERN VALE AREA OF LOCAL
PLAN DEVELOPMENT TRAFFIC AS ABOVE ONTO A420 LINK (RESIDENTIAL USE)**

Land Use	Unit	Arrivals	Departures
Residential	Housing Units	0.43	0.25
Totals	673	289	168

**TABLE 14 - TRICS TRIP RATE SUMMARY – AM PEAK FOR OTHER DEPOSITED PLANNING
APPLICATIONS AWAITING DECISION IN VWHDC**

Land Use	Unit	Arrivals	Departures
Residential	Housing Unit	0.16	0.45
Totals	4700	752(226)	2115(635)

**TABLE 15 - TRICS TRIP RATE SUMMARY – PM PEAK FOR OTHER DEPOSITED PLANNING
APPLICATIONS AWAITING DECISION IN VWHDC**

Land Use	Unit	Arrivals	Departures
Residential	Housing Units	0.43	0.25
Trip Rate	4700	2021(606)	1175(353)

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** It noted that not all the predicted vehicle trips in tables 13 and 14 will have a direct impact on the A420. However, due to the location of some applications it would be reasonable to assume around (30%) of these flows will use the A420 within the peak hours for travel to work and the school run. On this basis around 850 will use the link in the morning peak and around 950 in evening peak.*

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**TABLE 16 - TRICS TRIP RATE SUMMARY – AM PEAK FOR VWHDC LOCAL PLAN
DEVELOPMENT TRAFFIC ONTO A420 LINK (PROPOSED EMPLOYMENT TRAFFIC)**

Land Use	Unit	Arrivals	Departures
Employment	Housing Units	1.66	0.58
Trip Rate per 100m2 GFA	750	1245	435

**TABLE 17 - TRICS TRIP RATE SUMMARY – PM PEAK FOR VWHDC LOCAL PLAN
DEVELOPMENT TRAFFIC ONTO A420 LINK (PROPOSED EMPLOYMENT/RETAIL TRAFFIC)**

Land Use	Unit	Arrivals	Departures
Employment	B1, B2 and B8	0.26	1.30
Trip Rate per 100m2 GFA	750	195	975

**TABLE 18 - TRICS TRIP RATE SUMMARY – AM PEAK FOR SWINDON LOCAL PLAN
DEVELOPMENT TRAFFIC ONTO A420 LINK RESIDENTIAL**

Land Use	All	Arrivals	Departures
Residential	Housing Units Including Eastern	0.16	0.45

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	Villages		
Trip Rate	8000	1280	3600

**TABLE 19 - TRICS TRIP RATE SUMMARY – PM PEAK FOR SWINDON LOCAL PLAN
DEVELOPMENT TRAFFIC ONTO A420 LINK**

Land Use	All	Arrivals	Departures
Residential	Housing Units as above	0.43	0.25
Trip Rate	8000	3440	2000

NB These flows represent a case with no modal shift, Swindon Borough Council are placing a great emphasis for the new rapid transit system being fully function.

**TABLE 20 - TRICS TRIP RATE SUMMARY – AM PEAK FOR SWINDON LOCAL PLAN
DEVELOPMENT TRAFFIC ONTO A420 LINK (PROPOSED EMPLOYMENT/RETAIL TRAFFIC)**

Land Use	Unit	Arrivals	Departures
Employment	B1 and B2	1.66	0.58
Trip Rate per 100m2			

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GFA	1000	1660	580
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**TABLE 21 - TRICS TRIP RATE SUMMARY – PM PEAK FOR SWINDON LOCAL PLAN
DEVELOPMENT TRAFFIC ONTO A420 LINK (PROPOSED EMPLOYMENT TRAFFIC)**

Land Use	Unit	Arrivals	Departures
Employment	B1, B2 and B8	0.26	1.30
Trip Rate per 100m2 GFA	1000	260	1300

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6.3.4 To provide a robust assessment I have made the assumption that the proposed development traffic from the proposed development sites within the VWHDC Local Plan up to 2029 will have a proportionate split in flow when entering the existing highway network. I have assumed a 70-30 split in distributing traffic onto the network for both peak periods (trip rate x 0.70 and Trip rate x 0.30) travelling west in the AM Peak and similar figures reversed flow in the PM peak on the A420 link in line with the current proportionate splits of existing traffic flows.

6.3.5 In the am peak, traffic flow towards Oxford will be around 3334 vehicles with the remaining 7835 travelling west towards Swindon, South to the M4 and North to the M5 and beyond. In the pm peak the likely traffic flows are 3264 towards Swindon and around 7100 towards Oxford.

6.4 TOTAL PREDICTED TRAFFIC RELATIONSHIP WITH OPERATIONAL CAPACITY LIMITS

6.4.1 Tables 22 and 23 below show the proposed total trips onto the A420 link junction in the AM and PM peak periods.

TABLE 22 - PROPOSED TOTAL TRIPS ONTO A420 LINK JUNCTION AM PEAK

Land Use	ALL DEVELOPMENT PROPOSALS OF BOTH LOCAL PLANS	ALLTWO WAY FLOWS ON A420
All Predicted Development (No alternative modes of transport) *		10070

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Existing Traffic (Aug 2015)	AADT 2015	1782
decrease allowing Modal shift predictions and linked trips	It is reasonable to assume a 30% reduction for this.	7049
Total likely increase		1782+7049= 8831

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TABLE 23 - PROPOSED TOTAL TRIPS ONTO A420 LINK PM PEAK.

Land Use	ALL DEVELOPMENT PROPOSALS OF BOTH LOCAL PLANS	ALLTWO WAY FLOWS ON A420
All Predicted Development (as above)		9586
Existing Traffic (Aug 2015)	AADT 2015	1773
decrease allowing Modal shift predictions and linked trips	It is reasonable to assume a 30% reduction for this.	2876
Totals		6710+1773 = 8483

6.4.2 As demonstrated above, the various land-uses that will impact on the A420 Swindon – Oxford Link Road would generate an additional traffic flow total of vehicular movements in both peak periods of around 8000 movements using the TRICS Database. Even if we were to accept the lower trip rates of around 0.52 as set out in the JMP Transport Strategy on behalf of the Council, as comparable with other major planning applications mentioned below, we would still see significant increases in traffic flows of around 6000 in the AM Peak and 6000 in the PM Peak in the absence of any reasonable alternative modes of transport.

6.4.3 I have outlined the normal traffic generation approach for this development in the scoping meeting with WV. We have to consider robust trip rates with that of the present database indicative of 0.61-0.68 or somewhere within this range, as the locations of the proposed developments are in

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predominantly car-borne locations with no real sustainable travel choices of which to choose from. It should also be noted that some delivery and service vehicles will also take access from the link on a daily basis although this rate is low.

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6.4.4 This predicted flow is in addition to the current flow rates on the A420 link and will join this route at various junctions. It should be pointed out that these figures are predictions in 2031 towards the end of the planned period. It is certain that flows will incrementally increase over the development years. It is imperative to reduce traffic that both planning authority and highway authority design, provide and fully implement sound workable public transport services as development stages progress, should the EIP Inspector approve the current development allocations in their entirety.

6.4.5 It is my considered opinion that due to the peripheral location of the site allocations there is, and will be, the potential for a higher trip rate, particularly in the winter and both SBC and VWHDC should consider the worst case situation as identified, particularly if there is no or limited public transport provision within a reasonable walking distance to the sites.

6.4.6 Another major point worth noting, is that as part of the PBA Transport Assessment submitted in support of planning application no P13/V0139/O, without including the traffic impact of the other three developments as mentioned, came to the conclusions of their study that the **A420/Park Road junction will be operating at 97% of its operational capacity in 2017. This does not allow for any of the VWHDC development allocations or policies. However, in their assessment of Planning Application No P15/V2541/O for North Shrivensham they revised this figure downwards to represent current nationally accepted trip rates.**

6.4.7 I also consider that these predicted trip rates could be increased even further, to correspond with lack of adequate sustainable means of travel as previously identified. In this case it would not be unreasonable to predict a further addition of around 10% on the above predicted flows in line with

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current sustainable travel to work patterns, particularly as the sites is not relatively close to any
definitive footway/cycleway links.

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6.4.8 On both parameters this route will have serious capacity related issues if the VWHDC allocated development sites are allowed to proceed and even more, a total stand still if the cross boundary issue of SBC is ever allowed to proceed with the scale of the Eastern Villages proposal.

6.4.9 The significantly high levels of traffic generation of these emerging development plans together with committed and permitted development before any Local Plan is formally adopted, together with natural growth, will have a massive detrimental effect in terms of operation and safety on the highway network with major unsustainable and damaging differences to the operational capacity either in 2014 and more particularly in 2029 on traffic generation grounds due to the proportionate traffic impact on the Vale area .

6.5 **SUMMARY**

6.5.1 It can be seen that through the adopted SBC local plan and the emerging VWHDC Local Plan proposals together with other planned developments will result in a very large increase in vehicular trips during the peak periods of around 8000 in both peak hours by the end of the planned periods. However, these projected traffic flows can be notionally further increased or decreased by around 10% due to the provision of/or lack of any reasonable alternative means of travel to work other than by car. It is clear from the traffic counts that this link is a highly used commuter route and with the predicted further significant traffic levels it will become even more difficult to gain reasonable access from any of the junctions mentioned earlier in this Assessment, without having to wait for a considerable time. I have myself experienced trying to exit from the B4000 to turn right towards Oxford in the morning peak and waited in a queue for around 11 minutes. Quite clearly with all the predicted traffic these proposed

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developments will have on this part of the network, drivers will try to find alternative routes to their destinations. This will cause further network hold ups on current rat runs which could result in further highway safety concerns.

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6.5.2 Therefore, traffic flows on the A420 caused by all the proposed developments will be significantly higher than those currently observed during the AM and PM peak periods. These projected flows will cause demonstrable harm in terms of congestion, increased accident levels, and environmental harm. The costs to the economy in terms of delays will be high. It has already been identified by both the OxCC, VWHDC and SBC that significant shortfalls in the infrastructure needs to balance the highway operational requirements and adding significant traffic flows to an already congested network will only make the situation undeliverable over the planned period. There will be, in my view, a material impact on the safe operations of the local highway network. I recommend in the absence of any indication from the VWHDC and indeed SBC, of how they intend to deal with the difficulties likely to result, that the Inspector at the forthcoming EIP does not encourage development without adequate infrastructure planning. What is needed is the validation of sensible and deliverable solutions to the congestion issues on the A420 link road. In other words, no development without infrastructure improvement.

7.0 OTHER HIGHWAYS CONSIDERATIONS - A420 LINK, BETWEEN OXFORD AND SWINDON

7.1 as mentioned in the main body of the report above, I have added a supplementary report outlining the infrastructure measures necessary to ensure the Local Plan is Deliverable and Viable which is to be discussed under Matter 13 of the Inspectors programme. This supplementary report clearly highlights some of the existing issues that cause further delays and disruption to the free flow of traffic when travelling on this route. It is anticipated that as part of any development site delivery, the local highway authority, OxCC, would actively seek to rectify some if not all of these concerns, together with other major route scheme investigations as part of any adopted Local Plan Policy in final form so

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as to ensure soundness which is highlighted in Matter 7. If these measures cannot be duly implemented over the plan period then the issues regarding Matter 10 are totally flawed as a strategy for the Western Vale cannot be determined.

SUMMARY:

The A420 between the A417 and A419 has numerous design flaws, defects and hazards and does not fully comply with the design standards contained within DMRB. Any increase in vehicular movements along its length will add to the problems highlighted above and placing all road users at risk of incident. Any new developments seeking requiring the A420 for access should consider all of the above issues and contribute to fully mitigate their direct impact. There should be no exceptions as the A420 is operating at capacity at peak and includes many defects and hazards.

Local authorities should bring the A420 up to standard before even considering any future development that would increase vehicular movements along this length and provide a clear infrastructure plan to accommodate the impact of further developments as well as maintaining the existing road surface, signing and lining along this length.

8.0 CONCLUSIONS

8.1 This Assessment and the supplementary report has considered the transport and highway implications for the proposed development sites being put forward by Vale of White Horse District Council, current planning applications awaiting a decision, and the effects of the Eastern Villages proposals across the county border in Swindon. I have examined the predicted additional traffic flows as part of any pre-local plan development proposals and the major development allocations of the

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Swindon Local Plan, namely the Eastern Villages and employment park proposals all of which have significant cross boundary traffic issues. I have also examined the traffic effects on the local link roads from the A419 (T)/A420 Roundabout to the A420/A415 junction along the A420 corridor.

8.2 These development proposals do not strike any balance in terms of delivery. They do not encourage the use of sustainable modes of transport via new pedestrian/cycleway links or adequate public transport provision. The emerging Local Plan is diminished by its seeming lack of any strategic thinking when developing the document and does not evenly distribute development across the VWHDC geographical area. There is a number of brownfield sites that could be utilised and help preserve the rural concepts of the Vale area.

8.3 VWHDC clearly accepts that this is a congested route about which it should have already expressed major concerns. Some of the proposed development sites are not near or adjacent to the local centres and therefore fail to create good accessibility opportunities by sustainable modes such as walking, cycling and public transport.

8.4 It has been demonstrated that the proposed developments will result in a significant increase of around 8000 two way trips during the AM peak period and of 8500 two-way trips during the PM peak at the end of the planned period in 2031. In the absence of any real prescribed measures in place to encourage alternative modes of travel these additional vehicle trips will only greatly worsen an already congested highway network, which in turn could increase the accident risk potential for all road users.

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Therefore, traffic flows to and from the proposed development allocation sites will be disproportionately high in comparison to other rural areas and are in my view unsound

8.5 In the absence of any practical solutions put forward by either the VWHDC or OxCC at this time it is therefore arguable that due to the possible frustration of drivers caught up in excessive congestion levels, these Local Plan proposals could contribute to existing road safety problems.

8.6 In its current form the emerging Local Plan and Local Transport Plan of both Councils are in contravention of many of its existing policies applicable to transport assessment and sustainable travel. They fail to comply with the Government's flagship National Planning Policy Framework ("NPPF"). They also fail to deliver any high quality development in the heart of Oxfordshire. The opportunity for access by sustainable modes is neither realistic nor really achievable. In Swindon for example there is significant weight being placed on a 'Rapid Transit system' without bus lanes. Systems of this type take a long time to implement and it is safe to say that a significant amount of development will have taken place prior to its provision. It is reasonable to conclude that there are some demonstrable transport or highway related reasons why the proposed developments should not be permitted through the Local Plan EIP process without the commitment to adequate infrastructure provision.

APPENDIX 1 – NECESSARY INFRASTRUCTURE REQUIRMENTS REPORT (Accepted by OxCC)

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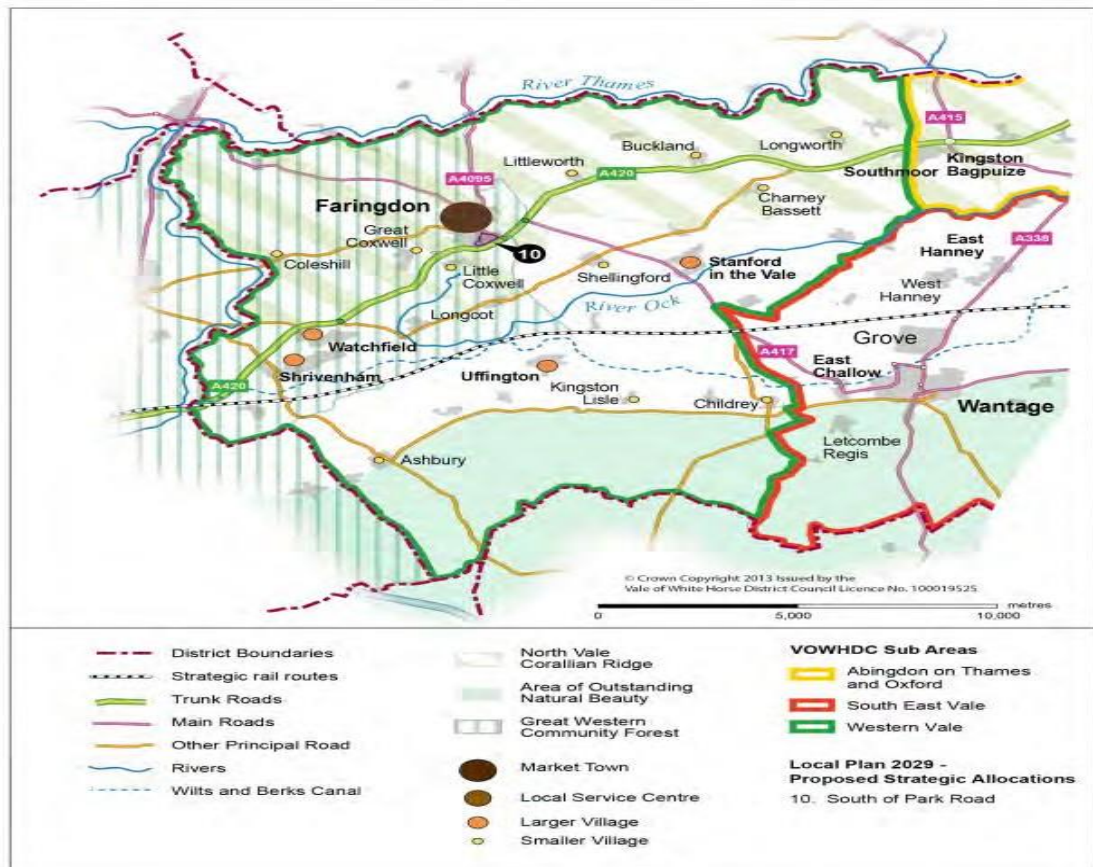
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**APPENDIX 2- UPDATED AADT TRAFFIC FLOWS SUPPLIED BY OXFORDSHIRE
COUNTY COUNCIL**

NECESSARY INFRASTRUCTURE REQUIREMENTS ON A419/A420/A415 LINK



ON BEHALF OF
WESTERN VALE VILLAGES CONSORTIUM OF
PARISH COUNCILS LISTED
AS A
REPRESENTATION TO THE VALE OF WHITE HORSE DISTRICT COUNCIL
EMERGING LOCAL PLAN TO 2031 BY REFERENCE TO ITS DETRIMENTAL
TRAFFIC AND ROAD SAFETY IMPACTS ON THE LOCAL HIGHWAY NETWORK
(A419/A420/A415 LINK)

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Western Vale Villages Consortium of Parish Councils ("WVV")

Wanborough PC

Bourton PC

Bishopstone PC

Ashbury PC

Compton Beauchamp Parish Meeting

Longcot PC

Watchfield PC

Shrivenham PC

And a number of other councils along the A420 associated with WVV, namely.

Faringdon Town Council

Uffington PC

Buckland PC

Great Coxwell PC

Hinton Waldrist PC

Littleworth Parish Meeting

Kingston Bagpuize PC

Buckland PC

Fyfield and Tubney PC

Fernham Parish Meeting

Frilford Parish Meeting

Hatford Parish Meeting

Little Coxwell PC

Pusey Parish Meeting

And with the valued support of CPRE Oxon

1.0 INTRODUCTION

1.1 Bob Hindhaugh Associates Ltd have been appointed to prepare a short report on behalf of Western Vale Villages ("WVV") Consortium of Parish Councils and others Parish Councils associated with it to demonstrate to the Vale of White Horse District Council ("VWHDC") that all significant development in this area with direct traffic links onto the A420 will have a detrimental and adverse traffic effect on the A420 Swindon to Oxford link road. The report will also highlight the necessary infrastructure improvements that would be required as a minimum to maintain safe passage on this route.

1.2 I have held scoping discussions with WVV, prior to preparing this document. The format of this report and its processes are considered accurate and applicable. For consistency and continuity, the background documents used in preparation of this report are the Transport Route Congestion Assessment (TRC) prepared in April/May 2013 which considered the significantly high transport implications the Local Plan development proposals will have on the local highway network which and demonstrated quite clearly how the levels of accessibility by sustainable modes of transport are inadequate and do not help to reduce new trips by car in line with current policy. This document TRC along with the Statement of Common Ground Document (SOCG) dated April 2014, which was fully agreed and signed by Swindon Borough Council (SBC), Oxfordshire County Council (OxCC), Vale of White Horse District Council (VWHDC) and the Western Vale Villages (WVV) also highlights key areas of concern on the A420 and a number of improvements where suggested as part of any emerging local plans. The SOCG is attached as Appendix 2 of this report.

1.3 Local Plan developments (and other applied for developments in the area) will materially affect current traffic conditions and will significantly increase the levels of peak time congestion residents already endure; and that the proposals set out in the VWHDC local plan part 1, do not accord with national planning policy and guidance relating to cumulative traffic caused by development and the 'severe' traffic impact the proposed developments will generate. Another key factor of any future planned development is the transport sustainability of any proposed development and is considered as a fundamental issue which is clearly set out and defined in the National Planning Policy Framework (NPPF). I would also recommend that my Route Congestion Report is submitted alongside this supplementary document as it provides detailed technical information on all aspects of the associated traffic problems on the A420 in its current form.

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This report provides a breakdown of key traffic management concerns on the A419(T) - A420 – A415 Transport Route Corridor and in section 5, a 'Wish List' of necessary improvements and actions that may reduce further impact on delays and congestion;

1.4 The effects of traffic on other local roads that have a direct link to the A420 have also been considered. However, to compile a robust case, detailed consideration of the cross boundary vehicle trips as part of the emerging Swindon Borough Council Local Plan, particularly sites on the Eastern side of Swindon have also been considered as this development traffic represents a realistic case in terms of the traffic situation and its impact. This is a view supported by OxCC Highways Department in a draft paper prepared for a joint Authority meeting of SBC, OxCC, VWHDC and WVV on 17 March 2014.

2.0 DESCRIPTION OF LOCAL ROADS AND OF THE ROUTE A419/A420 /A415 AFFECTED BY PLANNED DEVELOPMENT

2.1 AREA LOCATION

2.2 The highway link under consideration in this report is from the A419 (T) -/A420 White Hart roundabout along the length of the A420 until it meets with the Junction of the A415 (***A point to be noted is that the A419 (T) is within the Wiltshire boundary area. However, it does have a significant role to play in the cross boundary traffic flow levels on the A420 Swindon to Oxford link***). A plan of this route is shown in **Appendix 1** of this report. As part of the assessment, other junctions which are already experiencing congestion and stress have also been reviewed and analysed.

3.0 LOCAL POLICY

3.1 At a local level, the content, scope and methodology of any Transport Assessment (TA) or Transport Statement (TS) must be discussed and agreed with the relevant local authority ensuring it seeks to achieve improvements to the highway network and provide sustainable transport patterns which limits the traffic impact on the local network in accordance with the Council's own adopted and relevant policies.

3.2 Any well drafted emerging local plan up to 2031 should set out fully the 'Soundness and ability of the plan to be delivered', particularly in its relation to the Accessibility, Traffic, Transport and Infrastructure Requirements necessary to support the development proposals around the district. I am not aware of any detailed Transport Assessment available from the Council on which to analyse or indeed provide a more rebuttal based response to the plan in line with the following key areas.

- **Ensure that public and other transport links effectively allow people to get to places of work;**
- **Reduce the need to travel;**
- **Maintain and enhance existing transport infrastructure; and**
- **Provide travel choices.**

3.3 In my professional opinion the VWHDC Local Plan does not clearly demonstrate fully, how the following general policies in relation to transport and new developments are to be secured. It does however make strong

cross references to the Oxfordshire Local Transport Plan and the NPPF. However Oxfordshire Local Transport Plan 4 (LTP4) is not yet in circulation although The County Council do recognise The A420 is the principal route between Swindon and Oxford and that it is an important strategic link in the Oxfordshire road hierarchy. It will have its own strategy as part of Local Transport Plan 4, which will be consulted on in the New Year. Therefore on this issue alone the Local Plan fails as there are no specific measures identified in it considering proposals for any new development. In the absence of LTP4 and detailed highway analysis on the A420, how can the Council have full regard to the following key aims of any well-defined transport strategy:

- **The requirement to reduce the need to travel, especially by car;**
- **To ensure that the development is accessible by a variety of means of transport;**
- **The need to minimise the effects of traffic generation; and,**
- **The need to produce a Travel Plan.**

It is also stated that public transport facilities will be improved wherever the opportunity arises, and that new development will only be allowed where it can be well served by public transport or improves public transport services.

3.4 VALE OF WHITE HORSE DISTRICT COUNCIL (VWHDC)/OXFORDSHIRE COUNTY COUNCIL (OCC) LOCAL TRANSPORT PLAN2012-2031

3.5 It has been stated previously, that it is broadly accepted by the Western Vale Villages (WVV) consortium of Parish Councils together with other Parish Council's and interested organisations, that to ensure growth, economic development and stability in the area, some development in the Vale area needs to take place. What is of major concern to the WVV and the other affected local parish council's is the proportion of development identified and allocated in this predominantly rural area.

3.6 If, residential development as set out in this emerging local plan development was restricted to a reasonable limit of between 10% and 15% of the current village sizes, then in principle, there would be no major objections as this would stimulate growth in these areas at a representative level whilst still supporting local amenities. There are many anomalies and sweeping statements contained within this plan which were highlighted within the RCS.

3.8 Both VWHDC as the Local Planning Authority and Oxfordshire County Council as the Local Highway Authority, have responsibility for the delivery and implementation of the Local Transport Plan ("LTP"). In line with national and regional policy objectives. The LTP is integral to this process as it follows a similar theme for continuity, in that it promotes policies and measures to achieve improvements particularly for alternative modes

FINAL BH/WVV 12 December 2014.

of travel within the Council's geographical area and is a key strategy to which to align the Local Plan and generally for the basis of the traffic and transportation elements and foundations within the local plan.

3.9 PRINCIPLES OF THE OXFORDSHIRE TRANSPORT STRATEGY AND ITS CONNECTION WITH SWINDON BOROUGH COUNCIL TRAFFIC IMPLICATIONS

3.10 The transport strategy for the future development aims of any emerging Local Plan provides the means to achieve the identified policy objectives by optimising the opportunity for access to/from any allocated site either now or in the future by non-car modes. This approach is in full accordance with all local, regional and national policies. It is considered that the approach for this Development Plan must be cohesive with good connectivity to/from the centre of Oxford, other major conurbations and the surrounding area, for all modes of transport, motorised and non-motorised. These measures should be very real and very deliverable from any of these site allocations and would comply fully with the underlying principles set out in the VWHDC Local Development and Transport Plan.

3.11 SUMMARY

3.12 Provision for safe access into and throughout the Western Vale Villages area namely, the A420, A415 and the A417 B4000 will be extremely congested for all road users unless some major highway improvements are undertaken at key locations along the route to sustain growth but limit congestion.

1. The development plan does not adopt the fully sustainable approach it seeks to project and which is specifically highlighted in both local and national policy as being necessary within the planning process.
2. Its emerging potential developments are not located close to town centres, efficient public transport facilities. Thus many in the surrounding residential areas will almost certainly need to travel by private car (this view is also expressed within the Local Plan) as this route is quite clearly an extensively used commuter route. The traffic impact of the proposed developments close to or impacting on this corridor will not conserve energy nor help limit the emission of greenhouse gases. On the contrary, the impact of additional significant traffic flows will only further degenerate air quality.
3. The location of the proposed developments will NOT promote sustainability by reducing the number of car trips on this link as there is no promotion of sustainable modes of travel such as walking, cycling, and the use of public transport as public transport services in this area are

particularly poor. There is no mention of the effective use of Travel Plans. A full highway assessment should be carried out before sites are put forward for allocation rather than afterwards; and

4. The level of car parking throughout the development proposals needs to be balanced to ensure a demonstrable level of restraint, and thus promote alternatives to car use.

3.13 Furthermore, good pedestrian and cycle linkages to a number of locations, facilities and public transport services must ensure that the development is sustainable as required by national and local policy.

4.0 LOCAL PLAN DEVELOPMENT PROPOSALS AND COMMITTED DEVELOPMENT AFFECTING THE HIGHWAY LINK A419/A420 WHITE HART ROUNDABOUT – A415.

4.1 The initial RCS assessment carried out in 2013, is based on discussions with WVV and a number of other Parish Councils each of which has major traffic and congestion concerns about the extent of the development proposals on this congested link and the access roads to/from specific villages as identified within the RCS report. The RCS work demonstrated that this road will be operating over capacity and does not conform with current national policy relating to link capacity.

Below is the VWHDC description of their view on providing **Core Policy 7: Providing Supporting Infrastructure and Services**. The locations of strategic allocated sites demonstrate the lack of any credible sustainable transport measures will only worsen the situation significantly for residents and current regular users of this road as part of their everyday business requirements.

4.2 Core Policy 7: Providing Supporting Infrastructure and Services

4.3 All new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from the proposal. Infrastructure requirements will be delivered directly by the developer and /or through an appropriate financial contribution prior to, or in conjunction with, new development. In ensuring the timely delivery of infrastructure requirements, development proposals must demonstrate that full regard has been paid to the Infrastructure Delivery Plan and all other relevant policies of this plan.

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4.4 If infrastructure requirements could render the development unviable, proposals for major development should be supported by an independent viability assessment on terms agreed by the relevant parties including the Council and County Council, and funded by the developer. This will involve an open book approach. Where viability constraints are demonstrated by evidence, the Council will:

- i. prioritise the developer contributions sought with regard to the IDP (i.e. first priority to Essential Infrastructure and second priority to Place Shaping Infrastructure), and/ or
- ii. use an appropriate mechanism to defer part of the developer contributions requirement to a later date, and/ or
- iii. as a last resort, refuse planning permission if the development would be unsustainable without inclusion of the unfunded infrastructure requirements.

4.5 The Council's Delivering Infrastructure Strategy will include both a CIL Charging Schedule and a Supplementary Planning Document for Section 106 and Section 278 legal agreements that will provide more detail about its approach to securing developer contributions. Upon adoption of the CIL Charging Schedule, CIL will be used to pool developer contributions towards a wide range of new and improved infrastructure necessary to deliver new development. Where not covered by the CIL Charging Schedule, infrastructure and services, including provision for their maintenance, should be delivered directly by the developer through the development management process and in accordance with The Regulation 122 Tests*.

4.6 Planning conditions and planning obligations will be sought to mitigate the direct impact(s) of development, secure its implementation, control phasing where necessary, and secure contributions towards the delivery of the necessary infrastructure.

4.7 Core Policy 33: Promoting Sustainable Transport and Accessibility

4.8 Supporting sustainable transport and accessibility safeguarding of land for strategic highway improvements within the Western Vale Sub-Area. The Evaluation of Transport Impacts (ETI) Study that has been prepared to inform the Vale Local Plan of the traffic issues associated with the A420 and other strategic roads within the County. It however, place a greater emphasis on capacity issues on the A34 and M40. What is not clear, is where other strategic routes are experiencing congestion problems what level of traffic transfers to other routes such as A420

4.9 The Local Plan 2031 Part 1 has quite rightly identified some capacity issues on the A420, but it is subjective and unsupported by any evidence to state it is likely to occur later in the plan period. Oxfordshire County Council already recognise the A420 is experiencing congestion issues and following intervention by WVV is now going to allocate resources into a full technical route study to identify what improvements are required as part of its LTP4 process. However, the LTP work will not commence fully until next year (2015). This impact is partly as a result of the development proposed in the sub-area and will particularly affect junctions accessing Faringdon and Shrivenham, but a greater highway capacity concern is due to the potential Eastern Villages development proposals in Swindon close to the Oxfordshire boundary and the cross boundary traffic flows are of a major concern.

4.10 Oxfordshire County Council is working with partners including the Vale of White Horse District Council and Swindon Borough Council to develop a Route Strategy for the A420 (between the A419 and A34) as part of the work to update the Local Transport Plan (LTP). The strategy will help to ensure this important and strategic route continues to operate with minimal congestion and to avoid rat runs on minor roads. The ETI has identified that revised junctions are needed on the A420 at both Faringdon and Shrivenham. For this reason, land is safeguarded at these locations to ensure these necessary upgrades can be delivered alongside the planned growth at these settlements in accordance with Core Policy 21.

4.11 VWHDC Local Plan - Core Policy 33: Promoting Sustainable Transport and Accessibility

4.12 I have highlighted the key elements of this policy that are critical to the effective traffic impact management on the A420 link. The council have confirmed it will work with Oxfordshire County Council and others to develop their sustainable aims as set out below:

- i). actively seek to deliver the transport infrastructure and measures which improve movement in the Science Vale UK area as identified in the County Council's Local Transport Plan's (LTP), Science Vale UK Area Strategy and the Science Vale UK Integrated Transport Package, in partnership with South Oxfordshire District Council.
- ii). actively seek to ensure that the impacts of new development on the strategic and local road network are adequately mitigated for
- iii). support measures identified in Oxfordshire County Council's LTP including the relevant local area strategies for the district

- iv). support improvements for accessing Oxford
- v). ensure that transport improvements are designed to minimise effects on the amenities of the surrounding area
- vi). encourage the use of sustainable modes of transport and support measures that enable a modal shift to public transport, cycling and walking in the district.
- vii). promote and support improvements to the transport network that increase safety, improve air quality and/or make our towns and villages more attractive
- viii). ensure adequate parking is delivered on new developments in accordance with Oxfordshire County Council's published standards
- ix). all developments that generate significant amounts of movement must be supported by an appropriate transport assessment or statement and travel plan that is agreed by Oxfordshire County Council, and
- x). promote electronic communications allowing businesses and residents to operate throughout the district and to provide services and information that reduce the need to travel.

4.13 As previously mentioned this emerging policy relies on the Oxfordshire Local Transport Plan (LTP4) and in particular the LTP policy **TR4** which provides the transport sustainability issues, measures and method of delivery supporting alternative modes of transport to help reduce the reliance of private car use within the County. I have covered the specific issues relating to pedestrian, cycling and public transport aims and provided a view on mobility impaired road users. The needs of those with mobility impairment are an important component of emerging development plans.

4.14 SUMMARY

4.15 In summary the emerging VWHDC Local Plan has no real cohesion to it, it makes generalised statements unsupported by evidence and fundamentally it completely fails to recognise in any detail or any substance or have any regard to effective, sustainable, travel measures and provision. It is all 'if', 'but' and 'maybe' generic sweeping statements and in my opinion does not comply with either the NPPF or indeed its own core policy 33 or the recently approved Local Transport Plan Policy TR4 which is troubling. Furthermore, contained within the Local Plan appendices pages 47-57 Western Vale Sub-Area, it briefly highlights some measures, but has no budget or costs applied to it. It will rely solely on developers demonstrating what they feel is required rather than the authority spelling it out. This is a major development plan for the district for the next 15 years. The plan safeguards land for highway improvements therefore, the authority should at this stage be specifying exactly what is required and then it becomes formally adopted policy to which developers have to abide by.

5.0 HIGHWAYS IMPROVEMENTS FOR CONSIDERATION - A420 LINK, BETWEEN OXFORD AND SWINDON AS A RESULT OF THE LOCAL PLAN ALLOCATIONS

5.1 It is now widely accepted that the A420 Swindon –Oxford strategic link road is experiencing a consistently high level of traffic flows which results in long periods of congestion. Following positive discussions between SBC, OxCC, VWHDC and the WVV earlier this year a SOCG was prepared which highlights many of the outstanding highway issues concerning the A420 link and serves as a very useful starting point recognising an initial package of measures to be implemented should the SBC local plan be approved. Research has been carried out with reference to the Governments recent announcement on infrastructure investment and the A420 is not included within the list of improvements. With this in mind, the list of improvements outlined below by WVV is considered to be an absolute minimum in coming to terms with the additional traffic impact the proposed local plan allocations will generate.

5.2 Below is a list of existing issues and concerns currently affecting the A420 link between Swindon and Oxford. All of these key issues will be further exacerbated by any significant increase in vehicular numbers along its length, especially during peak times. This section clearly highlights some of the existing issues that cause further delays and disruption to the free flow of traffic when travelling on this route. It is anticipated that as part of

any development site delivery, the local Highway Authority would actively seek to rectify some of these concerns, together with other major route scheme investigations prior to the local plan becoming an adopted document.

5.3 The following in bold is a **'wish list'** of highway maintenance and junction improvements along the route to provide safer traffic management for all road users and is requested by WVV consortium to be provided through developer and other public sector funding/Grants

1. **Provide cycleway links from side roads allowing cyclists to gain safe passage onto the A420 particularly near to existing conurbations**
2. There are several unregulated but signed crossing places for pedestrians, wishing to cross over the A420 when walking along a public right of way that crosses the road. **These hazardous crossing places must be better signed with a required reduction in speed on their approach.**
3. The average carriageway width varies between 7.3 and 8.0 metres with a maximum of 10 metres at the odd location and as such speed limits fluctuate between 50 / 60 mph along most of the A420 with small sections of 30 / 40 mph. Overall for the majority of its length the A420 has a speed limit of 50 mph or higher. **Review and implement a revised speed management plan for the A420 for consistency and safety along the route**
4. An area of particular concern is that, on the approach to the roundabouts at Faringdon and Watchfield, instead of advising motorists to slow down, the speed limit increases to the national speed limit (60mph), which therefore is advising motorists of a higher speed just before the hazard of an approaching RAB. **All approach speeds towards roundabouts to be reviewed as above in Point 3.**
5. There is a large number of the chevrons signs along the A420 indicating that along this route there are continuing concerns with regard to speeding traffic and incidents. Some of these chevrons are yellow backed. Others on severe bends are dirty and faded and without any yellow backing which would highlight the signage in the dark enhancing road safety along the route. **Replace and renew all worn out signs.**
6. Road signing along vast lengths of the A420 is not in accordance with standards for road markings and are in poor condition. This is very concerning as most of the A420 does not have a system of street lighting, footways, cycle ways and remains a clear way. I would suspect that due to the high levels of traffic using the route the road markings are continually being eroded and that there may be no money

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in the highway maintenance budget to keep up with required works. **Repaint and enhance all the road lining and replace old signs with new current signage**

7. Heavy peak time traffic movements along this section of the A420 take the afternoon peak time traffic movements past beyond 1830hrs. The volume and high level of traffic is consistent with the heavy reliance of the motor vehicle as highlighted within the draft local plan. **Heavy peak time and non-peak time traffic movements are evident at all the junctions. WVV would like to see significant improvements at the following junctions to enhance safety, ease capacity and access problems.**

- Townsend Road, west of Shrivenham (roundabout provision)
- B4508 Roundabout at Watchfield
- A420 slip road to Great Coxwell (roundabout junction provision)
- A420/A417 roundabout to Faringdon. Potential for peak time traffic signal control
- A420/A415 roundabout, as above consider peak time traffic signal control

As well as looking at the above mentioned junctions, traffic and speed management solutions should be provided to roads running parallel to the A420 to prevent rat running are as follows;

- B4507 Swindon-Wantage
- B4508 East of Shrivenham
- B4000 South of Shrivenham

As the A420 becomes increasingly more congested, these routes will become more attractive alternative routes to employment sites at Science Vale (Wantage and Didcot) and this should be discouraged.

8. The A420 appears to have a reasonable bus service. However due to the limited bus stops and pedestrian links to surrounding villages, the existing bus services are very under used with most buses virtually empty in each direction of travel to either Swindon or indeed Oxford. This could be greatly improved by the following measures

- **Improved bus connections and facilities along the route, including walk/cycle links, cycle parking, high quality shelters and real time passenger information is required.**
- **Improved service provision, particularly in the peak times.**

- **Local Plan Policy 21 sets out that land alongside the A420 has been safeguarded for infrastructure improvements. To assist with free flow traffic, provide off road bus layby's, this will remove obstructions to the free flow of traffic and provide a safe area for the setting down and picking up of passengers using the No 66 service.**

9. Park Road, Faringdon has queuing vehicles heading south towards the RAB (junction with the A420) at peak times. I have witnessed some vehicles wanting to gain access towards Swindon actually drive along the centre of Park Road towards the relatively high flows of oncoming traffic heading into Faringdon. There are proposals for both large housing and commercial developments at this location. For this road to operate safely and efficiently without increasing journey times for existing users, there will need to be major infrastructure improvements at this location.

Widen the Park Road to allow a safer access and egress from the roundabout. To prevent excessive queues, investigate the provision off-peak time traffic signals at the roundabout, giving priority to traffic on the A420 as previously mentioned

10. The condition of parts of the A420 is very poor on sections of the road and has been signed with skid warning and hump warning signs. **A full carriageway maintenance scheme along the route to improve the safety of travelling vehicles.** The recent improvements in the surface West of the Watchfield roundabout has been well accomplished with modest disruption to traffic.
11. Turning right out of Great Coxwell, Coxwell Road onto the A420, turning right is difficult with high waiting times.

Provide a roundabout junction, giving all road users safer entry and exit onto the network

12. Turning right out of Townsend Road onto A420 is very difficult with high waiting times. There are also queuing issues along Townsend Road and Cley fields.

To overcome this problem, as above provide a roundabout to provide a safer solution.

13. At the Police HQ signals there is "No Right Turn" ban heading east towards Swindon. This forces all traffic past the Police HQ and around the Sainsbury's RAB.
14. Sainsbury's Gable Cross 5 arm RAB junction with Sainsbury's / Thorn Hill Road / Horstmann Close / A420 with a Toucan Crossing and is a real concern especially at peak times and backs up from the 5 arm White Hart roundabout (RAB) junction with A4312 (Oxford Road) / Erwin Street / A419 / Merlin Way / A420 up to the Toucan crossing in both directions.

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15. At the Sainsbury's 5 arm RAB, there is an approach speed of 40 mph with multiple turning movements in all directions. Queuing off Thorn Hill Road is especially difficult for an HGV turning right towards Swindon. An HGV may have to wait several minutes especially during peak times before there is a gap in the traffic to enable this right turn movement. When the Toucan crossing signals turn red, this allows a turning movement to take place. This clearly demonstrates the volume of traffic that a HGV is facing at peak times when exiting Thorn Hill Road onto the A420. The industrial estate off Thorn Hill Road is proposing to increase in size therefore increasing HGV movements at this location.

Points 13, 14 and 15 are out with the geographical area of VWHDC. However, these junctions have been identified for further analysis and clearly itemised within the SOCG agreement between SBC, OxCC and VWHDC and will be included in the impending route assessment.

5.4 SUMMARY:

5.5 The A420 between the A415 and A419 has numerous design flaws, defects and hazards and does not fully comply with the design standards contained within DMRB. Any increase in vehicular movements along its length will add to the problems highlighted above and placing all road users at risk of incident. Any new developments seeking requiring the A420 for access should consider all of the above mentioned highway improvements and contribute to fully mitigate their direct impact. There should be no exceptions as the A420 is operating at capacity at peak and includes many defects and hazards. Many of the suggested improvements are already outlined within the attached statement of common ground.

5.6 Local authorities should consider a full maintenance scheme bring the carriageway A420 up to better standard before even considering any future development that would increase vehicular movements along this length. The VWHDC infrastructure plan does not go into sufficient detail with regards to accommodate the impact of further developments as well as maintaining the existing road surface, signing and lining along this length will have. The Council are relying on developer led TA's as a mechanism to secure funding, rather than specify their requirements to improve this strategic link which to me is the wrong procedure.

5.7 The WVV would like to see the suggested list of improvements highlighted in bold above implemented fully as a mechanism to improving journey times, safety and providing a good reliable bus service as a very realistic alternative to the private car.

6.0 CONCLUSIONS AND RECOMMENDATIONS

6.1 These development proposals do not strike any balance in terms of delivery. They do not fully encourage the use of sustainable modes of transport via new pedestrian/cycleway links or adequate public transport provision. This emerging Local Plan is amplified by its complete lack of strategic thinking when developing such an important document and does not in my view evenly distribute development across the council's geographical area. There is a number of brownfield sites that could be utilised and help preserve the rural concepts of the Vale area. This area is not a highly sustainable location and the VWHDC clearly accepts that this is a congested route about which it should have already expressed major concerns. Some of the proposed development sites are not near or adjacent to the local centres and therefore fail to create good accessibility opportunities by sustainable modes such as walking, cycling and public transport.

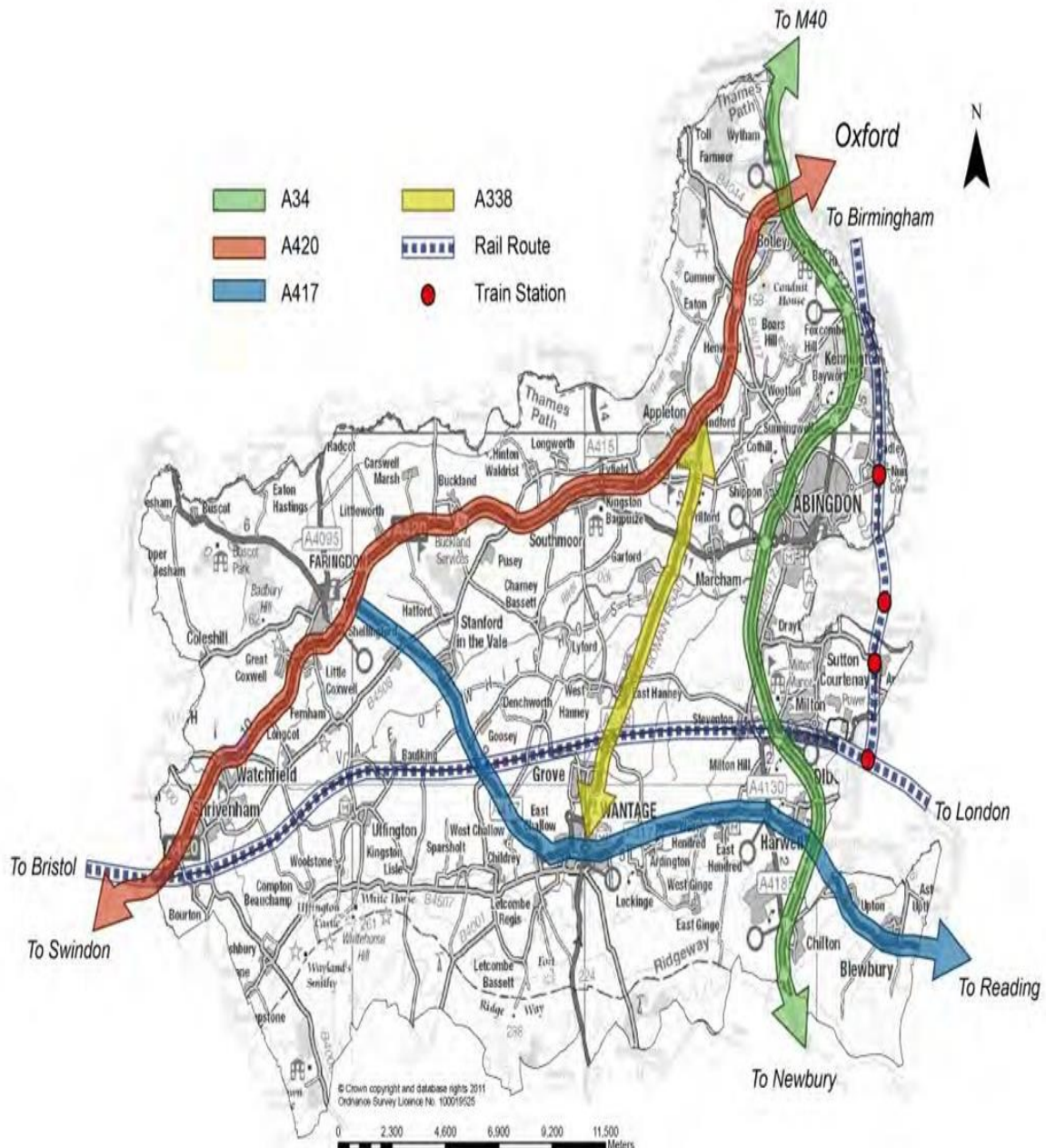
6.2 In conclusion, in its current form the emerging Local Plan is in contravention of many of its existing policies appertaining to transport assessment and sustainable travel. It fails to comply with the Government's flagship National Planning Policy Framework (NPPF). It will also fail to deliver any quality development at the heart of Oxfordshire and the opportunity for access by sustainable modes is both non-realistic and unachievable in the Vale. It is reasonable to conclude that there are some significant transport or highway related reasons why the proposed development should not be permitted through the Local Plan EIP process without significant infrastructure provision. The local residents of the West Vale Villages Consortium, CPRE and the other Parish Councils should respectfully ask the Inspector at the forthcoming Examination in Public to find the current plan unsound for the reasons advanced in this report.

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APPENDIX 1 – ROUTE LOCATION PLAN



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APPENDIX 2 – STATEMENT OF COMMON GROUND