

## Comment

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<b>Address</b>	The Old Crown Oxford Road Wantage OX12 0HR
<b>Event Name</b>	Vale of White Horse Local Plan 2031 Part One - Publication
<b>Comment by</b>	Dr Paul Birkby
<b>Comment ID</b>	LPPub1198
<b>Response Date</b>	19/12/14 15:06
<b>Consultation Point</b>	Supporting sustainable transport and accessibility ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1 Do you consider the Local Plan is Legally Compliant?</b>	Yes
<b>Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified)</b>	No
<b>If your comment(s) relate to a specific site within a core policy please select this from the drop down list.</b>	N/A

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

**Q3 Do you consider the Local Plan complies with the Duty to Co-operate?** Yes

**Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

The Local Plan 2031 is inconsistent with many of the policies listed and is therefore unjustified and unsound. There are no plans for how to achieve the core policies and therefore the plan is not deliverable. The reasons for this are described below.

The plan sets out policies that will significantly increase the population and employment in the Vale, leading to a significant increase in the number of people needing to travel.

The Vale already has 1.5 cars per household, above the national average of 1.16, whilst only 9% use public transport for employment. (Reference: Equality Impact Assessment)

Many of the roads in the Vale are rural in nature, passing through villages. Traffic along these roads and through many villages will increase significantly because, in general, the car is the only reasonable option for travelling. There will also be significant increases in the number of HGVs and buses on the roads to service the additional businesses and also the construction that will be ongoing.

Core policy 44 (vi) lists the need to protect against intrusion from light pollution, noise and motion. For those living near busy roads in villages such as Steventon, Fillford, East Hanney and Marcham a deliverable plan to mitigate the increases in traffic should be included in the Local Plan, but has not been. A plan for this should be implemented before large scale development occurs.

There are a number of Core Policies and Strategic Objectives relating to transport:

- 1 Core Policy 19: Re-opening of Grove Railway Station
- 2 Core Policy 33: Promoting Sustainable Transport and Accessibility
- 3 Core Policy 35: Promoting Public Transport, Cycling and Walking
- 4 SO 8: Reduce the need to travel and promote sustainable modes of transport
- 5 SO 9: Seek to ensure new development is accompanied by appropriate and timely infrastructure delivery to secure effective sustainable transport choices for new residents and businesses.
- 6 SO 12: Minimise greenhouse gas emissions and other pollution (such as water, air, noise and light) across the district and increase our resilience to likely impacts of climate change, especially flooding

These policies are in general welcomed and supported. The major concern is that there is no credible plan to actually deliver these policies - they appear to be more of a wish list.

The Infrastructure plan mainly appears to increase capacity at various junctions so that more vehicles can use the roads. This will only serve to increase noise and pollution and will not be consistent with the policies listed above.

The plan should be aimed at reducing the number of car journeys by locating housing near to employment and services, improving public transport and by providing safe cycling routes. Where required any road changes should direct traffic away from settlements rather than increasing the capacity through them.

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The plan should be aimed at reducing the number of car journeys by locating housing near to employment and services, improving public transport and by providing safe cycling routes. When cars are required the road building [BP1] should direct traffic away from settlements rather than increasing the capacity through them.

[BP1] Not sure this makes sense?

**Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Measures that are clearly against the core policies should be removed from the Local Plan. For example, junction improvements to increase traffic along rural roads and through villages should not be part of the plan, unless they are to improve safety, as this will not be consistent with Core Policy 44.

The Local Plan should contain a deliverable plan on how to achieve the transport policies that it contains. For example:

- 1 A deliverable plan to mitigate the increases in traffic through rural communities
- 2 A deliverable plan for CP19, CP33, CP35
- 3 A deliverable plan for more cycle routes covering rural areas and better public transport.

The local plan should be aimed at reducing the number of car journeys by locating housing near to employment and services, improving public transport and by providing safe cycling routes. Where required any road changes should direct traffic away from settlements rather than increasing the capacity through them.

The deliverable plan should be implemented before, or at least in parallel with, the housing delivery contained in this plan.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

**Q6 If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?** No - I do not wish to participate at the oral examination