

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Mr Oliver Gardiner
Comment ID	LPPub1030
Response Date	19/12/14 10:34
Consultation Point	Core Policy 7: Providing Supporting Infrastructure and Services (View)
Status	Submitted
Submission Type	Web
Version	0.1

Q1 Do you consider the Local Plan is Legally Compliant? Yes

Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified) No

If your comment(s) relate to a specific site within a core policy please select this from the drop down list. 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.

Roads ? county wide

To quote from the Oxfordshire Local Economic Partnership's SEP

? Oxfordshire currently suffers from capacity issues exacerbated by in-commuting. These in turn create constraints to economic productivity and growth in the county. The A34 and A40, in the heart of Oxfordshire, suffer from poor journey times that will prove a significant constraint as the economy grows. The delays caused by congestion are a cost borne by businesses and can lead to less productive employees. These (and other) capacity restrictions limit business efficiency and investment, and the ability for communities to access the full range of services?. The A34 is at capacity and suffers from severe journey time reliability problems which in turn cause major delays to users?. Businesses cite the A34 and A40 as having a significant impact on business and it is identified as the key piece of infrastructure restricting innovative growth .?

Roads ? local

The A417 passes right through Harwell Village, with 10% of it's houses having entrances directly or indirectly into the highway. Although the modelling doesn't specifically cover the stretch within the village, there is no reason to believe that that the road here also be operating at or above operational capacity.

The Plan Evidence Base, specifically the **Evaluation of Transport Impacts Report 2014** when evaluating traffic forecasts for the Local Plan Publication Version (ETI Stage 5) summarises key highway issues (7.3.19 page 37):

? A34 operating at or above operational capacity in both directions between Milton and Batley in the morning and evening peak.

? A417 operating at or above operational capacity between Wantage and Featherbed Lane in the morning peak and in the other direction in the evening peak.

? A420 operating at or above operational capacity in both directions near Buckland and in short sections near Cumnor and Fyfield in the morning and evening peaks.

? A415 operating at or above operational capacity between Kingston Bagpuize and Frilford, with particular problems at the Frilford junctions with the A338 and between Marcham and the A34.

? A4130 operating at capacity approaching Milton Interchange.

The study then looks at possible mitigating scenarios, but still concludes

In summary, it can be seen that the main east-west and north-south corridors across the Vale have instances where sections of the routes are forecast to be operating at or above operational capacity.

Para 7.7.3. and 7.7.16 conclude

In the morning peak the A417 is forecast to be operating at or above operational capacity in the eastbound direction between Wantage and Featherbed Lane. In the evening peak the A417 is operating at or above operation capacity in the westbound direction between Featherbed Lane and Wantage. Delays are forecast to be in the order of ten minutes along this five mile route. The A417 Corridor Study is currently being progressed in discussion with the Parish Council's along its route. It will investigate these issues and it is expected that the public transport and smarter choices strategy will at least increase the people moving capacity of this corridor.

Rail

There is already inadequate rail services for commuting to the London area. One of the reasons for imposing growth on the County is to meet growth pressures spilling out from London so it will inevitably increase pressure to commute back into London and Heathrow. The lack of a station for Wantage does not help as Didcot parking is virtually at capacity, is rationed by price and is putting pressure on parking elsewhere in the town (in South Oxfordshire District),

Additional train services, additional stations, additional parking, additional connecting services, by bus or tram, are, in many case aspirational, or, if planned, they are years away, so growth as envisaged by the Plan is unsustainable.

Hospitals

No traffic modelling appears to have been done to demonstrate that all residents of the Vale, including all those in the proposed housing will have appropriate and timely access to hospitals. This ranges

from public transport access for those without cars to rapid access within the 'golden hour' for emergencies such as heart attacks.

Services

New developments, and existing communities, complain of lack of broadband.

Thames Water cannot cope with the sewage discharge from Great Western Park.

Additional sewage capacity is needed for new developments in Harwell, and already the main village sewer is at capacity

Although the specifics are possibly outside the inspector's remit, they add up to a challenge to the soundness of the plan and the sustainability of the proposed allocations.

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.

Reduce the housing allocations to a level where the committed and funded infrastructure can be demonstrated to operate appropriately, and there are not significant sections of the infrastructure (of all types, not just roads) operating at or above operational capacity

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