



Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

Please return by 5pm on Wednesday 22 November 2017 to: Planning Policy, Vale of White Horse District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@whitehorsedc.gov.uk

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	Mr	
First Name	Paul	
Last Name	Walker	
Job Title (where relevant)	Strategic Development Manager	
Organisation representing (where relevant)	Oxford Bus Company	
Address Line 1	Cowley House	
Address Line 2	Watlington Road	
Address Line 3		
Postal Town	Oxford	
Post Code	OX4 6GA	
Telephone Number	07980 923256	
Email Address	paul.walker@oxfordbus.co.uk	

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Core Policy
8a

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Compiles with the Duty to Cooperate

Yes

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

Sites closer to Abingdon and the A34 provide a more sufficient quantum of demand to support multi modal journeys –especially by bus with better connections to both Didcot and Oxford. Accordingly we would therefore propose sites put forward north and south of Abingdon come forward through the planning period.

We additionally support policy 8a(i) in that the development is *“in accordance with and meets the requirements of a travel plan for the whole site to make necessary contributions in order to implement sustainable transport initiatives, including minimising car usage and increasing the use of public transport, walking and cycling”*. We do however have concerns on how public transport connectively can be made and would like to see this come forward through the master planning the site and Comprehensive Development Framework.

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6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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

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Name or organisation:

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Paragraph

Policy

Core Policy
8b

Policies Map

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4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Compiles with the Duty to Cooperate

Yes

No

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We note the proposals for improved Pedestrian access to Park & Ride at Lodge Hill and Cumnor. Contributions toward enhancing public transport corridors in the area, particularly to ensure good access to routes between Abingdon and Oxford which may form part of the new park and ride services. Oxfordshire County Council is proposing the development of Bus Rapid Transit (BRT) schemes to help buses get to the city centre more quickly. However at this stage the plans are not mature enough to demonstrate how the highway will be used to facilitate this and therefore what journey time improvements can be made that would be a sufficient and deliverable alternative to what is currently provided.

There could be potential through a developer's contribution specifically to divert service 4 via the site although this would be an extensive diversion which would need to be well accommodated within the site layout and through developer's contributions. The policy wording at paragraph 2.62 suggests that a link between the City-Cumnor PnR- Dalton Barracks is already defined. This is not the case and therefore the development at Dalton Barracks coming forward predicated on this link is not assured and needs to be developed through the Comprehensive Development Framework.

In terms of how such a service could be delivered it already takes about 30 minutes from Abingdon to Botley and about 50 minutes to the City Centre. There could be scope for additional buses between Cumnor and Abingdon to be provided at the expense of other parts of the network which would be far from ideal. Essentially, it would be very useful to refine a service enhancement proposition for Dalton Barracks which is proportionate to the size of the proposed development and which could be translated into a Developer Contribution and we would wish to work with the Local Planning and Transport Authorities as soon as possible to scope out what service level could be achieved and the cost of doing so.

We additionally support policy 8a(i) in that the development is *“in accordance with and meets the requirements of a travel plan for the whole site to make necessary contributions in order to implement sustainable transport initiatives, including minimising car usage and increasing the use of public transport, walking and cycling”*. We do however have concerns on how public transport connectively can be made and would like to see this come forward through the master planning the site and Comprehensive Development Framework.

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Name or organisation:

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Paragraph

Policy

Core Policy
12a

Policies Map

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4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Complies with the Duty to Cooperate

Yes

No

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The Chartered Institute of Highways and Transportation (CIHT) in the Parking Strategies Management Report (2005) stated that day-to-day car parking occupancy should be no more than 85% so that users can enter and leave the car park with the minimum amount of wasted time – clearly with many Park & Ride sites in Oxford in excess of this on a daily basis we support the of adding additional capacity. However we consider as a principal that additional capacity should be provided where possible at existing sites and therefore before development, a sequential test of existing capacity should be applied.

We support the development of new park and ride models where these are feasible – in terms of generating suitable BCRs we would suggest this needs to build on existing sites and where there is or shall be demand created. This includes improved and prioritised links for buses between settlements including access onto major routes as well as through major sites which will give certainty to journey times.

The locating of new P&R's further out of the city will increase journey times and cost significantly and reduce attractiveness to many commuters. It is generally regarded that with bus based P&R twenty minutes is an acceptable journey time. Commuters within the ring of proposed "outer" P&R sites would, in our opinion be unlikely to drive out of town to travel back in through P&R provision. We consider the Lodge Hill proposals to be competent only if supplied with the A34 Bus Lane but have yet to see any proposals by Highways England on how this will manifest itself, considering the strategic importance of this link and the need to maintain access (particularly by HGV's between the Midlands and South Coast Ports. Journey times on the A34, currently has average speeds of between and 40-50mph. We therefore would contend that the best way of ensuring that Park and Ride sites on the outer extremities of the city are only viable through the provision of a dedicated service from point to point to reduce overall end-to-end journey times.

Moreover and A34 bus lane could assist in meeting the need for a “high quality, fast, frequent and reliable public transport to better integrate knowledge & employment across the region and to expand labour markets improving business to business connectivity”.

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We therefore propose the policy wording be amended to so that the sites reserved come forward in a co-ordinated manner applying a sequential test to provision at existing park and ride sites as well as being able to demonstrate what journey time improvements can be made that would be a sufficient and deliverable alternative to what is currently provided.

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Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Core Policy
15a

Policies Map

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Yes

No

4. (2) Sound

Yes

No

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With respect to Harwell Campus, this site is close to the service 32A which currently operates hourly between Abingdon, Milton, Didcot, Harwell and Wantage. There is scope for a joined up approach in bringing sites forward in Milton, Harwell and Rowstock to ensure that the current issues in terms of access and penetration by bus services are overcome and that the aspirations of the LEP to get a 15 minute journey time from Didcot Rail Station to Harwell can be met.

This would need to include not only on-line improvements to the existing highway but also the dedicated provision of bus only connections that will enable a quick transition by bus. This might mostly be achieved by a dedicated service connecting Didcot-Milton-Rowstock-Harwell service through developer contributions with possible extensions to Wantage. We would be keen to explore these options as part of an overall master plan for this area. Piecemeal development would lead to further pressures on the 32A, X32 and connector service.

We note and support the policy wording to contribute to improved frequency and hours of service on the strategic bus route between Wantage, Harwell & Didcot and propose that the policy be reworded to include reference to the level and scope of bus service improvements to this development and the relevant developer contributions arising from it.

In relation to Milton Heights This site is close to the X2 which currently operates hourly between Oxford, Abingdon, Didcot and Wallingford half hourly via a connector service to Didcot. There is a need for a joined up approach in bringing sites forward in Milton, Harwell and Rowstock to ensure that the current issues in terms of access and penetration by bus services are overcome and that the aspirations of the LEP to get a 15 minute journey time from Didcot Rail Station to Harwell can be met. This would need to include not only on-line improvements to the existing highway but also the dedicated provision of bus only connections that will enable a quick transition by bus.

This might mostly be achieved by a dedicated service connecting Didcot-Milton-Rowstock-Harwell service or improved service enhancement of existing services or through enhanced existing provision. Piecemeal development would lead to further pressures on the X32 and connector service. We note the Contribution of £1000 per dwelling identified in VoWH IDP December 2016 although consider this somewhat “light” to deliver the improvements proposed.

We would propose that any provision links to existing services to ensure that longer term, existing services are reliable and that a contribution for to enable an enhanced service between Milton Heights and Didcot utilising existing services is progressed to enable these services to become more viable long term.

North West of Grove is distant from current service X32 provision although taken with the other proposed sites as well as committed developments within Wantage and Grove we would be happy to look at how developers contributions could be used to provide a comprehensive service providing links to major nodes to ensure long term viability of services can be maintained, including a potential to extend the current service to Didcot Abingdon and Oxford.

We note the contribution to the premium bus service from Grove to Milton Park and Oxford stated in the plan and propose that the policy include reference to the level and scope of bus service improvements to this development and the relevant developer’s contributions arising from it.

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15b

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Yes

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4. (2) Sound

Yes

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We support the approach of developing a SPD for the site that will include infrastructure required to make the site deliverable (Para 2.100) & the Sustainability Appraisal (p66) which states “The bus stop on Harwell Campus Bus station is well beyond the 400m distance”.

We support the Policy at 15b(i) which states that the development will need to “make necessary contributions in order to implement sustainable transport initiatives, including minimising car usage and increasing the use of public transport, walking and cycling”.

We would also suggest that bus operators are explicitly referred to in the policy in terms of ensuring that the site is operationally deliverable.

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Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

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Vale of White Horse
Local Plan 2031 Part 2

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Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	Mr	
First Name	Paul	
Last Name	Walker	
Job Title (where relevant)	Strategic Development Manager	
Organisation representing (where relevant)	Oxford Bus Company	
Address Line 1	Cowley House	
Address Line 2	Watlington Road	
Address Line 3		
Postal Town	Oxford	
Post Code	OX4 6GA	
Telephone Number	07980 923256	
Email Address	paul.walker@oxfordbus.co.uk	

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

Figure 2.7

Policy

Core Policy
16b

Policies Map

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

Yes

No

4. (2) Sound

Yes

No

4. (3) Compiles with the Duty to Cooperate

Yes

No

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

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We support the Masterplan Principles (Figure 2.7 (4) which states *“the Garden Town will reduce reliance on motorised vehicles and promote a step change towards active and public transport through the creation of highly legible, attractive and accessible movement network...”*

We would urge the Inspector to encourage the Local Planning Authority to emphasise that bus operators are explicitly referred to in the policy in terms of ensuring that the site is operationally deliverable. We would be content to discuss potential bus routing options and developers contributions that would apply with the planning authority and developer although we support site specific Section 106 funding to provide services which are commercially unviable.

(Continue on page 4 /expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the duty to cooperate 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

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Name or organisation:

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Paragraph

Policy

Policies Map

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The Local Transport Plan 4 for Oxfordshire aims to support jobs, housing growth and economic vitality, reduce emissions and enhance air quality as well as protect the environment and quality of life. The Plan also aims to minimise the need to travel, influence development to maximise the use of existing and planned strategic development and develop sustainable patterns of growth to deal with worsening traffic congestion. We support measures to ensure improved access by all car modes only where bus journey times and journey time reliability are not compromised.

We would point to emerging guidance from CIHT which is currently being developed, and on which Oxford Bus Company have been involved. The aim of the guidance is make development more bus friendly and support the development of commercially viable routes once a development is fully built out. Development should also promote quality development and quality bus provision that is attributive to users with improved access to main corridors, less deviations off route and reduces potential delays with carriageway widths within new development a minimum of 6.75 metres.

Moreover it s essential that if developments are to be made sustainable public transport services are provided and funded from very early in the development to create transportation habits.

We therefore support Policy 15(iii) which states that *“acceptable off-site improvements to the highway infrastructure...and the public transport network can be secured where these are not adequate to service the development”* and this needs to be applied in suitable way across all sites by involve ling both commercial operators and infrastructure providers. Planning guidance should encourage developers to liaise with bus operators at early stages of development as well as the Local Planning Authority including bus operators into development if sire specific guidance and general SPD’s.

(Continue on page 4 /expand box if necessary)

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Name or organisation:

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Paragraph

Policy

Dev Policy 17

Policies Map

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We support the approach at paragraph 3.112 which highlights that *“where applicable, mitigation measures may be required through Section 106 and Section 278 agreements. Travel Assessments will be required under condition though Section 106 agreements and area keen to work with all parties in the development process to ensure bus services can come forward to service new developments providing the connectivity required”*.

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