

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.

Title

First Name

Last Name

Job Title (where relevant)

Organisation representing
(where relevant)

Address Line 1

Address Line 2

Address Line 3

Postal Town

Post Code

Telephone Number

Email Address

2. Agent's Details (if applicable)

Mrs

Sarah

Moorhouse

Associate Director

Lichfields

7 The Aquarium

1-7 King Street

Reading

RG1 2AN

01183341920

sarah.moorhouse@lichfields.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

4a

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) Complies 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.

Please refer to the accompanying representations document which sets out why our client considers the Local Plan is unsound.

(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 precise as possible.

Please refer to the accompanying representations document which sets out in detail what modifications our client considers necessary to make the Local Plan sound and why. Core Policy 4a should be amended to include land west of Steventon Road, Drayton in the additional site allocations for the Abingdon-on-Thames and Oxford Fringe Sub-Area to provide up to 80 dwellings.

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No, I do not wish to participate at the oral examination

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Signature:

Date:

22/11/2017

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I would like to be kept informed about the progress of the Local Plan

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I would like to be added to the database to receive general planning updates

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Part A

1. Personal Details*

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2. Agent's Details (if applicable)

Title	<input type="text"/>	Mrs
First Name	<input type="text"/>	Sarah
Last Name	<input type="text"/>	Moorhouse
Job Title (where relevant)	<input type="text"/>	Associate Director
Organisation representing (where relevant)	Earl of Plymouth Estates Ltd	Lichfields
Address Line 1	<input type="text"/>	7 The Aquarium
Address Line 2	<input type="text"/>	1-7 King Street
Address Line 3	<input type="text"/>	<input type="text"/>
Postal Town	<input type="text"/>	Reading
Post Code	<input type="text"/>	RG1 2AN
Telephone Number	<input type="text"/>	01183341920
Email Address	<input type="text"/>	sarah.moorhouse@lichfields.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

8a

Policies Map

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

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Yes

✓

No

4. (2) Sound

Yes

No

✓

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Yes

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Signature:

Date:

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First Name		Sarah
Last Name		Moorhouse
Job Title (where relevant)		Associate Director
Organisation representing (where relevant)	Earl of Plymouth Estates Ltd	Lichfields
Address Line 1		7 The Aquarium
Address Line 2		1-7 King Street
Address Line 3		
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Email Address		sarah.moorhouse@lichfields.uk

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Appendix A,
Part 4

Policy

Policies Map

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(Continue on page 4 /expand box if necessary)

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**Land West of Steventon Road,
Drayton**

**Representations to the Vale of
White Horse Local Plan 2031
(Part 2: Detailed Policies and
Additional Sites)**

Earl of Plymouth Estates Ltd

22 November 2017

LICHFIELDS



LICHFIELDS

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for over 50 years.

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Appendices

Appendix 1: Site Location Plan

Appendix 2: Concept Masterplan

Appendix 3: Transport and Highways Site Appraisal

1.0 Introduction

- 1.1 These representations have been prepared by Lichfields on behalf of the Earl of Plymouth Estates Ltd (EPEL) in relation to Land west of Steventon Road, Drayton (*“the site”*) as shown at appendix 1. The representations respond to the Vale of White Horse (VOWH) Publication Version of The Local Plan 2031 Part 2: Detailed Policies and Additional Sites (hereafter the *“Part 2 Local Plan”*).
- 1.2 The site was considered by VoWH (both in isolation and as part of a larger site) in their preparation of the Preferred Options Version of the *“Part 2 Local Plan”* (March 2017). VoWH recognised that development in this location would, in some respects, be a logical infill, however, the site was not recommended for allocation in the Local Plan. In essence the reasons that VoHW identified for not allocating the site were traffic, noise and air quality issues.
- 1.3 EPEL has not submitted any previous representations in relation to this site in respect of the Part 2 Local Plan and this response both addresses the earlier VOWH analysis and highlights the potential of the site to assist in meeting housing requirements in the short term. The changes sought by EPEL to the Local Plan are contained at section 6.0 of these representations.
- 1.4 Our representations are accompanied by an indicative masterplan prepared by Lichfields and an analysis of accessibility and transportation matters prepared by Systra.

Overview

- 1.5 In summary, our representations highlight a number of concerns with the emerging Local Plan strategy, which bring the prospect of the plan being found “sound” into doubt. We summarise our concerns below and expand upon these within the following sections:
- 1 There is no agreed comprehensive county-wide strategy to meet unmet housing need originating within Oxford City due to South Oxfordshire District Council (SODC) not agreeing to or signing the Memorandum of Co-operation (signed by other Oxfordshire Councils and other relevant parties). Therefore there is a shortfall of 1,200 dwellings – some or all of these may be required to be accommodated within VOWH in addition to the 2,200 additional dwellings currently planned for.
 - 2 The housing supply proposed in the Part 2 Local Plan is considered to be over reliant on strategic development sites, with doubts about their accessibility / sustainability and potential delivery constraints. This highlights the importance of the plan providing smaller scale and/or appropriately phased housing developments which are capable of delivery in the short to medium term of the plan period.
 - 3 Our representations go on to summaries the suitability of Drayton for further residential development (section 4.0)
 - 4 More specifically, they go on to address the appropriateness of the site for residential development (section 5.0). This draws on the Council’s own evidence base and an Initial Transport and Highways Site Appraisal by Systra (the Systra Analysis) (appendix 3). The illustrative masterplan (appendix 2) demonstrates that the site has the potential to deliver a sustainable development of up to 80 new homes with a mix of housing sizes across a range of tenures.
 - 5 Our conclusions, and revisions sought to the Local Plan, are set out in Section 6.0.

2.0 Housing Need

- 2.1 The VoWH Local Plan 2031: Part 1 (December 2016) covers a plan period from 2011 to 2031 and proposes the delivery of 20,560 homes over this time, which equates to 1,028 dwellings per annum (dpa). This addresses the housing need originating within the VoWH.
- 2.2 The Part 2 Local Plan seeks to address unmet need originating in Oxford City. This part of the plan increases the overall housing requirement to 22,760 dwellings during the same plan period. This results in an increase in the number of dwellings required per annum to 1,138dpa.

Unmet Need from Oxford City Council

- 2.3 The SHMA identified a countywide midpoint need for an additional 100,060 residential units (para 9.52, Table 90). The midpoint housing need for Oxford City Council is 28,000 homes from 2011-2031. The widely recognised constraints that arise from Oxford forming a compact urban area, with heritage and flood risk constraints and surrounded by Green Belt mean that it is widely recognised that they will be unable to meet this need in full. There is an acknowledgement by the surrounding authorities (including VoWH) that they will need to assist in meeting this unmet need (Part 2 Local Plan para. 2.7).
- 2.4 The process for the surrounding authorities to assist in meeting this unmet need is currently being resolved through the Oxfordshire Growth Board (OGB) a joint committee between the relevant Local Authorities, Oxfordshire County Council and Oxfordshire Local Enterprise Partnership. The OGB and surrounding districts have agreed a working assumption that to meet Oxford's unmet housing, 15,000 homes will need to be accommodated outside Oxford in the period to 2031.
- 2.5 Having identified a working assumption for the level of unmet need from Oxford City the OGB then sought to identify potential "*areas of search*" within the surrounding Local Authorities which could accommodate this need. The September 2016 OGB agenda (pg 22) notes that "*this was left to the individual authorities to identify the strategic options within their own districts . . . though for South Oxfordshire and the Vale of White Horse Districts, the initial set of options was prepared by the County Council.*"
- 2.6 A report was taken to the OGB meeting of the 26th September 2016 which set out a recommended apportionment of the unmet housing need of Oxford as follows:
- Cherwell: 4,400 dwellings
 - Oxford City: 550 dwellings
 - South Oxfordshire: 4,950 dwellings
 - **Vale of White Horse: 2,200 dwellings**
 - West Oxfordshire: 2,750 dwellings
 - Total: 14,850 dwellings.
- 2.7 At the meeting all of the Local Authorities agreed to the level of unmet need apportionment, and agreed to sign the Memorandum of Cooperation with the exception of South Oxfordshire District Council (SODC). The minutes record that Councillor Cotton, Leader of SODC stated he "*remained unconvinced that every option had been pursued for meeting the need in Oxford . . . He concluded that without such certainty he was unable to support adding to South Oxfordshire County Council's existing high housing need figure. He would therefore be unable to sign the Memorandum of Cooperation.*"

- 2.8 As a result South Oxfordshire Local Plan 2033: Final Publication Version (October 2017) only proposes to provide 3,750 dwellings of Oxford's unmet need – a shortfall of 1,200 dwellings over that arising from the OGB process. This shortfall is not being addressed by any of the other Oxfordshire Authorities.
- 2.9 The absence of SODCs agreement to the OGB apportionment means that Oxford City's unmet need is not met in full. As a result VoWH and other authorities surrounding Oxfordshire may therefore need to make a higher level of housing provision to meet this need as the Duty to Cooperate has not been complied with in full.

Other Matters

- 2.10 Since the 2016 Memorandum of Cooperation was completed the Department for Communities and Local Government (CLG) published Planning for the Right Homes in the Right Places: Consultation Proposals (September 2017). This identifies a forecast need, based on the draft methodology, for Oxford City Council (whose unmet need the Part 2 Local Plan seeks to meet) of 746 dwellings per annum compared to the current SHMA (2014) figure of 1,200 to 1,600.
- 2.11 This difference is likely to reflect the circumstances identified in the CLG Paper (para 28) where *“...for some local planning authorities, a reduction in their local housing need compared to the existing approach can be attributed to our method not making a specific adjustment to take account of anticipated employment growth”*.
- 2.12 There is no suggestion that either VoWH or the OGB are seeking to revisit or reduce their assessment of unmet need from Oxford City Council.
- 2.13 We concur with the approach being taken by VoWH and the OGB as this publication should have no bearing on the Part 2 Local Plan on the basis that:
- a The CLG consultation paper (para 55) states that where the Plan has been published, but not yet submitted then *“if a local plan is currently at examination or will be submitted for examination on or before 31 March 2018 or before the revised Framework is published (whichever is later), it should continue to be examined and rely on evidence prepared using the current method.”* The LDS (September 2016) envisages submission of the Part 2 Local Plan in February 2018. The plan should therefore proceed on the basis of the current plan preparation; and
 - b The NPPF is clear that strategies for housing and employment in local plans should be integrated (Para 158). The SHMA (2014) specifically identifies (para 9.52) that the level of housing provision identified *“is necessary to support committed economic growth; to support delivery of affordable housing; and to support an improvement in the affordability of housing over time.”* The CLG consultation paper (para 46) recognises that *“Plan makers may put forward proposals that lead to a local housing need above that given by our proposed approach. This could be as a result of ...increased employment (and hence housing) ambition as a result of a Local Economic Partnership investment strategy, a bespoke housing deal with Government or through delivering the modern Industrial Strategy.”* It goes on to state that *“we propose to amend planning guidance so that where a plan is based on an assessment of local housing need in excess of that which the standard method would provide, Planning Inspectors are advised to work on the assumption that the approach adopted is sound unless there are compelling reasons to indicate otherwise.”*

- 2.14 It is clear therefore that it is entirely appropriate for VoWH to continue to plan to meet unmet need originating in Oxford City Council on the basis of the SHMA (2014) analysis. Indeed there is no suggestion that they, or the OGB, would seek to do otherwise.

3.0 Housing Strategy

- 3.1 This section of the our representations reviews the proposed VoWH strategy for meeting the increase in housing need since the Part 1 Plan was adopted (ie the additional 2,200 dwellings summarised above)

Recent Housing Delivery

- 3.2 The most recent analysis of housing delivery within the VoWH is within their publication - Five Year Housing Land Supply Statement 2017/18-2021/22 (April 2017). This identifies
- 1 Their analysis to date does not purport to include “*unmet need*” from Oxford City (para 3.3);
 - 2 Housing delivery in the District in the period 2011/12 to 2016/17, at 4,680 (i.e. 780 dwellings per annum) represented under deliver of 1,488 dwellings over this six year period (table 2);
 - 3 The Council acknowledge their has previously been under delivery of housing and thus a 20 % buffer has been applied to future 5 year land supply analyses (para 3.12); and
 - 4 Forecast housing delivery is such that VoWH contend that they are able to demonstrate a 6.7 year housing land supply (table 5).
- 3.3 The resultant delivery rate in recent years of around 780 dwellings per year is far lower than both the Part 1 and Part 2 Local Plan requirements for future years and emphasises the necessity of the emerging Local Plan to establish a realistic and robust housing delivery strategy.

Supply of Deliverable Sites

- 3.4 The NPPF (para 47) requires Councils “*to boost significantly the supply of housing*” and “*use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for housing.*” Section 2.0 of these representations set out our clients concerns in relation to the housing need that the Part 2 Local Plan seeks to address.
- 3.5 The NPPF goes on to require local planning authorities to :
- 1 use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period; and
 - 2 identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land (increasing to 20 % where there has been a record of persistent under delivery of housing
- 3.6 The NPPF (footnote 11) clarifies that “*to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.* “

Lack of Transparency

- 3.7 The housing allocation figures in draft Core Policy 4a and 8a of the Part 2 Local Plan lack transparency. There is no single table identifying the provision additional 2,200 dwellings arising from the housing need (summarised in Section 2.0 of the representations) which necessitates the Part 2 Local Plan process.
- 3.8 Core Policy 8a refers to *“the quantum of unmet housing need for Oxford City to be addressed within the Vale of White Horse of 2,200 homes”* before going on to state *“2,020 dwellings will be delivered through additional allocations.”*
- 3.9 The Abingdon-on-Thames and Oxford Fringe Sub-Area Housing Supply table in both draft Core Policy 4a and draft Policy 8a identify Local Plan allocations comprising 2,020 dwellings and it is not clear how the remaining quantum of unmet housing need for Oxford (180 dwellings) is proposed to be met.
- 3.10 The Part 2 Local Plan needs to be clear and transparent about the sources and quantum of housing supply that it is relying on to meet housing need.

Strategic Allocations

- 3.11 Notwithstanding this is clear that Parts 1 and 2 of the Local Plan are heavily dependent on a few large scale strategic sites. These include the following four sites which account 2,300 dwellings.
- East of Kingston Bagpuize with Southmoor (600 dwellings)
 - Dalton Barracks (1,200 dwellings)
 - North West of Grove (400 dwellings); and
 - Harwell Campus (1,000)
- 3.12 Land east of Kingston Bagpuize and Dalton Barracks form part 2 allocations and we comment on these further below.

Forecast Housing Delivery

- 3.13 As noted above, recent housing delivery in VoWH, prior to the need to address unmet need from Oxford City is characterised by acknowledged *“under delivery.”* This increases the importance of a realistic supply of deliverable sites within the forthcoming five year period.
- 3.14 Having reviewed the Part 2 Local Plan proposals for housing delivery we are concerned that the new strategic allocations identified above, rely too heavily on the delivery of a few large scale sites. Large scale sites are not always easy to kick start due to their scale, complexity and (in some cases) up front infrastructure costs. Further to this, once up and running, there is a need to be realistic about how quickly they can deliver new homes.
- 3.15 The average lead in time for large sites prior to the submission of the first planning application is 3.9 years¹ and the greater the number of homes, the longer the planning approval period becomes. Further to this, large sites are typically not quick to deliver. The average annual delivery on strategic sites of up to 1,499 units barely exceeds 100 units per annum² once construction has commenced.

¹ Lichfields Start to Finish (November 2016) (Survey of 70 Large Housing Sites and 83 Small Housing Sites)

² Ibid

- 3.16 In addition our preliminary analysis has identified concerns regarding the accessibility, and therefore sustainability, of two of the main allocations within the Part 2 Local Plan

Dalton Barracks

- 3.17 Dalton Barracks is seeking to deliver 1,200 dwellings by 2031 (a substantial proportion of the new allocations in the Part 2 Local Plan) along with new infrastructure (such as new schools/local centre/open space).
- 3.18 The Part 2 Local Plan (draft Core Policy 8b) states that all new development at Dalton Barracks will be guided by a comprehensive development framework (published as a Supplementary Planning Document) to ensure its potential as a highly sustainable settlement. The preparation and adoption of the Framework for the site and resolution of the highway and transport issues will take time and therefore housing on the site is unlikely to come forward in the short to medium term and may not come forward during this plan period (up to 2031).
- 3.19 Significant works will also be required to the local highway network as the site is bordered by Wotton Road, Honeybottom Lane, Blackhorse Lane and Faringdon Road, all of which are single carriageway roads which are unlikely to be able to accommodate the uplift in traffic associated with the development proposals.
- 3.20 Access to the site from the east is also poor, with a footway of 1.3 metres only provided on one side of the carriageway on Long Tow which is not compliant with OCC design guidance which for the level of development and potential bus routes would require a minimum of 6.75 metres carriageway together with 2 metre footways. Further to this, pedestrian connectivity, cycle infrastructure and public transport will all need to be improved to accommodate the development.

Kingston Bagpuize with Southmoor

- 3.21 Land east of Kingston Bagpuize with Southmoor is allocated to deliver 600 dwellings. However, it is in a remote location limiting the opportunity for active travel as there are no key employment, leisure or education facilities within reasonable walking and cycling distances which creates a reliance on the private car or bus travel.
- 3.22 Further to this, bus services are limited, only serving Oxford and Faringdon and there are no bus stops within close vicinity of the site. Vehicular access required from the A420 and A415 will require two new developer delivered roundabouts and there are additional junction capacity issues as access to Abingdon from the site would require vehicles to route through Frilford lights which is already identified as a congestion hotspot.
- 3.23 As with Dalton Barracks, the resolution of these transport and highway issues is likely to take time and brings into doubt the site coming forward in the plan period, particularly in the short to medium term.

Conclusion

- 3.24 VoWH has recently experienced under-delivery of housing supply even prior to the increased housing target that the Part 2 Local Plan seeks to progress.
- 3.25 These recent and potential future delivery concerns are likely to be exacerbated by the fact that the housing supply identified within the Part 2 Local Plan is considered to be over reliant on strategic development sites including those in inaccessible locations and / or requiring significant infrastructure improvements.

- 3.26 This highlights the importance of the Part 2 Local Plan providing a range smaller scale and/or appropriately phased housing developments which are capable of delivery in the short to medium term of the plan period.
- 3.27 One such site, within a sustainable location, is land west of Steventon Road, Drayton. The subsequent sections of these representations assess both the sustainability and appropriateness of further modest development at both Drayton (section 4.0) and the EPEL site in particular (section 5.0).

4.0

Drayton

- 4.1 The village of Drayton is located approximately 3 kilometres south of Abingdon-on-Thames, 2 kilometres north of Milton Park and 2.5 kilometres west of the village of Sutton Courtenay. In 2011 it had a population of 2,353 and 978 dwellings (2011 Census). Drayton which is one of nine 'Larger Villages' within the Abingdon-on-Thames and Oxford Fringe Sub-Area. Within the Local Plan 2031: Part 1, Core Policy 3 sets out the settlement hierarchy for VoWH. The accompanying text (para. 4.1) states the strategy seeks to focus development within the rural areas to the Larger Villages thus helping to maintain their vitality and the sustainability of local services. Indeed, the majority of allocated sites within the Part 2 Local Plan are within Larger Villages, with Dalton Barracks within a Smaller Village.
- 4.2 The village used to be located on the main A34 between Oxford, Abingdon and Newbury. In the 1970s the A34 was re-routed as a dual carriageway bypassing Abingdon, Drayton and Steventon, and the section between Steventon Hill and Abingdon, running through the village was detrunked and reclassified as the B4017.
- 4.3 The village has generally evolved in ribbon form along the B4017 with all main services and facilities located around the junction with the north/south Steventon Road/Abingdon Road (B4017) and the High Street (B4016) to the east.
- 4.4 The village contains a mix of housing stock. A large part of the village is within Drayton Conservation Area which contains most of the historic buildings. To the west of the village there is a mix of modern residential development. To the east of the B4017, lies more varied, lower density organic development, characterised by paddocks and extensive gardens
- 4.5 There is a small public green in the centre of the village and a larger public open space called the Millennium Green to the north east of the village.
- 4.6 Drayton contains a range of services including two pubs, a Post Office and convenience store, a community primary school, hardware retailer and Church. There is also a recycling centre and golf club and coaching complex. There is a small public green in the village centre, and a larger community public open space (the Millennium Green) in the north-eastern part of the village.
- 4.7 There are no Sites of Special Scientific Interest, Special Areas of Conservation, National Nature Reserves or Conservation Target Areas within the Village.
- 4.8 The Hanson Way and Thames Valley National Cycle Route 5 (NCR5) passes east of Drayton and the proposed site. NCR5 can be accessed approximately 2 kilometres east of the site access point, via Kiln Lane, High Street and Drayton Road. NCR5 routes from Reading in the south to Lichfield in the north and passes through, among others, Oxford, Banbury, Stratford-upon-Avon and Birmingham.

Drayton Neighbourhood Plan

- 4.9 The Drayton Neighbourhood Plan was adopted in July 2015.
- 4.10 The Drayton 2020 Vision objectives include to ensure that any housing development meets the needs of Drayton's inhabitants, both present and future, fits into the character of the village and ensures the viability and sustainability of the village.
- 4.11 The Plan highlights the importance of sustainability but states (para 78):

“...At present Drayton has a ‘sustainability deficit’ in that housing developments in recent years have been small scale and have fallen below VWHDC’s threshold for Section 106 contributions, which are required only on developments of more than 10 houses. Whilst the village housing stock has grown by almost 10% in the last decade, there have been no developer contributions to the Parish to update the 1970’s village hall, address the lack of recreational facilities, or even fund extra places in the local primary school...”

- 4.12 The Plan allocates three sites for residential development providing a total of 255 dwellings. In terms of sites not included in the Plan, it states (para. 136):

“Within the village there are a number of sizeable sites, mainly in agricultural use at the present time, where the owner has not declared any intention to develop the land for housing, or at least not in the time period covered by the emerging VoWH Local Plan i.e. up to 2031. This does not prevent owners from changing their minds, and other sites may be put forward at some future date, but obviously the Neighbourhood Development Plan focuses on sites which are known to be currently available”.

5.0 The Site

- 5.1 The site is located immediately to the west of the established residential development on this side of the village (see Appendix 1). The site forms part of our clients wider land holdings within the area albeit only the land identified in these representations is being put forward for residential development.
- 5.2 Potential access arrangements are addressed within the accompanying Systra Analysis which notes that the site can be accessed directly off Kiln Lane, a single lane track which runs from the B4017 (Steventon Road). This constitutes the northern access to the site. Non vehicular access from the south is attainable via an existing Bridleway which runs adjacent to Drayton Hall from Lockway, a residential street. Both Bridleways cross the A34 westwards, and continue across land within the client's ownership.
- 5.3 The site is currently greenfield land, and is enclosed by hedgerows to the north and south. A mixed wooded verge runs alongside the western boundary of the site with the A34, whilst the Bridleway to the south runs alongside this boundary. A range of vegetation softens those rear gardens which back onto the site to the east from Lockway.
- 5.4 The Systra Analysis establishes that the site is located in an accessible location with a number of key local facilities catering for 'daily needs' within an acceptable walking distance. There are also a number of walking and cycling links available in the area and it is within close proximity to local bus stops off the B4017 which are served by a frequent bus service connecting the site to major employment areas such as Milton Park in addition to Oxford, Abingdon and Didcot Parkway station.
- 5.5 Vehicle access to the site is off Kiln Lane which connects the site directly to the local highway and onwards to the strategic road network. The site is therefore an accessible and sustainable location.

Potential Residential Development

- 5.6 The site has been identified as having potential for housing development in various evidence base documents in recent years although we would emphasise that these are the first substantive submissions that EPEL have made to the Local Plan process.

Strategic Housing Land Availability Assessment

- 5.7 The site was identified within the VoWH Strategic Housing Land Availability Assessment (SHLAA) in 2014 (as Dray 05). At 3.33ha, the proforma identifies the site as being Available, Achievable and "*Suitable in principle*" for development before concluding that the site is "*deliverable*."

Housing and Economic Land Availability Assessment

- 5.8 The Part 2 Local Plan Topic Paper 2 summarises the site selection process subsequently followed by VoWH. This notes that Stage 1 sought to identify sites and undertake an initial assessment of them, focusing on the Housing and Economic Land Availability Assessment (HELAA).
- 5.9 Within this the site is identified (DRAY02) as one of fourteen individual parcels around the village of Drayton. The site is identified as being available, achievable and "*suitable in principle, provided the constraints can be overcome*." The indicative trajectory suggests 83 dwellings could be delivered on the site in the 0-5 year period.

- 5.10 The accompanying proforma highlights that the site is relatively unconstrained as it is not in the Green Belt or an AONB, is not in a Flood Zone, not affecting any local, national or international ecological designations, is not in the vicinity of any heritage assets and there is an existing access to the site.
- 5.11 The site then passed the Stage 2 filter as the site capacity exceeded 50 dwellings and the site was outside the Western Vale search area.
- 5.12 The site then proceeded to a Stage 3 Assessment (DRAY02 - Appendix A of the Site Selection Topic Paper). This formed was a detailed assessment of Constraints and Opportunities including a high level of assessment of whether constraints could be overcome and whether the site is in accordance with the Development Plan including emerging policies. The site was considered to have reasonable potential for development to meet the specific housing needs in the Part 2 Local Plan and was therefore taken forward to Stage 4.
- 5.13 As part of the Stage 4 process the Council combined some of the sites to form 33 sites for detailed testing purposes. Our clients site was combined with 6 other adjoining parcels of land to the west of Drayton (DRAY_B) (see Appendix B of the Site Selection Topic Paper).
- 5.14 Stage 4 involved detailed evidence testing, informal consultation and sustainability appraisals. The wider site (DRAY_B) was discounted at this stage and was not proposed for allocation. The conclusion in the Local Plan Part 2 Preferred Options Publication (March 2017) was:
- “The site contains a significant number of constraints that impact the capacity of the site to deliver housing. Drayton experiences the same traffic issues to that of the South of Abingdon site, of which there is currently no viable solution, and there are known noise and air quality issues on this land to the west of Drayton.*
- Significant development at Drayton could only be supported if funding is provided for a South Abingdon bypass.”*
- 5.15 The Local Plan Part 2 Publication Version subsequently reviewed this conclusion and states:
- “As the site was not proposed to be allocated in the Preferred Options Local Plan 2031 Part 2, limited comments were received at that stage. No new evidence was submitted through the Preferred Options consultation, and therefore the original recommendation remains unchanged. Road noise, air quality and transport remain key constraints in this location and restrict any scale of allocation within this site”.*

Response to earlier analysis

- 5.16 The EPEL team has undertaken both a detailed design assessment of the scope for residential development on this smaller part of the wider site and have also assessed potential transport issues. This work is summarised below (with the indicative scheme attached at Appendix 2) and EPEL is happy to make the full analysis available to VoWH if this would assist their further assessment of the site.

Transport

- 5.17 The Systra Analysis which accompanies these representations concludes:
- a The proposed site is well positioned to promote sustainable trips to and from the site owing to its proximity to a number of bus stops within 400 metres of the site. The site is also within walking distance to a number of local facilities and also has well established walking and cycling routes within the vicinity.

- b Subject to detailed assessments, the potential delivery of up to 80 dwellings should not have a severe impact on the local highway network and would be similar in terms of the quantum of development to other committed developments promoted through the Drayton Neighbourhood Plan.
- c Existing local highway constraints surrounding the site have been recognised by the Local Authority and mitigation schemes and the safeguarding of land for the delivery of the Abingdon Bypass and improvements to Steventon lights have been devised.

Noise and Air Quality

- d In terms of noise, the provision of buffer planting and additional open space will reduce the total developable area to the east of the A34, however, it will also provide further visual and audible sheltering from the A34 for existing and potential future residents to the west of Drayton.
- e There is no reason in terms of transport and highways as to why the site should not be promoted for a residential allocation at this stage. Further to this, the site's overall level of access by a choice of modes of transport, including high frequency express service to key settlements and employment areas means the site is located in a key position to encourage sustainability and a modal shift away from reliance on the private car.

Indicative Masterplan

- 5.18 Informed by the site's constraints and opportunities, the illustrative masterplan proposes a central development area framed, and visually contained, by woodland and open space. The indicative layout also responds to the noise and air quality implications summarised above.
- 5.19 This results in a development of up to 80 new homes with a mix of housing sizes across a range of tenures.
- 5.20 The principal vehicular access to the development will be from Kiln Lane to the north of the site with additional footpath connections to the north, south and west of the site.
- 5.21 To the west and adjacent to the A34, the landscape buffer will be enhanced with new woodland planting and noise mitigation measures such as a bund and/or fencing. These design features will serve to address the air quality and noise concerns identified in the VoWH analysis.

Concluding Comments

- 5.22 Drayton forms a sustainable location and the site is well located in the village. Earlier analysis by VoWH highlighted the suitability, availability and deliverability of the site subject to addressing potential noise, air quality and wider highway constraints.
- 5.23 The subsequent analysis and design work undertaken by EPEL confirms that these matters are all capable of resolution and appropriate development of up to 80 dwellings is capable of being brought forward for development. Furthermore the site is capable of coming forward for residential development within the next 5 years.
- 5.24 The site is therefore in an ideal location to contribute to meeting the short to medium term housing need within the Vale of White Horse including Oxford's unmet need given its location in the Abingdon on Thames and Oxford Fringe Sub Area and proximity to Oxford City. The site should therefore be allocated for residential development in the Part 2 Local Plan.

6.0 Conclusions

- 6.1 Our client, Earl of Plymouth Estates Ltd, has concerns that the Vale of White Horse Local Plan: Part 2 and the evidence and analysis underpinning it, means that the Plan will not be found sound at examination.
- 6.2 These concerns focus on the fact that the emerging plan lacks transparency and is over reliant on larger strategic allocations to provide sufficient housing land to meet Vale of White Horse District's need. Furthermore, our analysis has highlighted that there are likely to be substantial and sustained delivery concerns over a number of the larger housing allocations that the emerging plan proposes.
- 6.3 We have also established that there is a shortfall of 1,200 dwellings within Oxfordshire which is not being met by any of the authorities and therefore the housing need within VoWH may need to increase further if the full apportionment of unmet need of Oxford City Council is not met by South Oxfordshire District Council.
- 6.4 As such, we consider the land promoted by our client west of Steventon Road in Drayton should be allocated in the Part 2 Local Plan to seek to ensure the full housing requirement for the Vale of White Horse District is delivered within the Plan period.
- 6.5 The land west of Steventon Road, Drayton was only discounted at Stage 4 of the Council's site assessment (and forms a smaller parcel of the larger site assessed). We consider that the additional information provided by our clients confirms that the concerns previously identified are capable of being overcome.
- 6.6 It is evident from our analysis that the site presents an idea location to contribute to housing growth given its proximity to existing services and good transport connections. Moreover, the indicative masterplan proposals show that the site is capable of accommodating up to 80 dwellings in a well designed layout.
- 6.7 The site should therefore be allocated as a new residential allocation in the Part 2 Local Plan.

Changes Sought to the Local Plan

- 6.8 In view of the above, our client seeks the following revision to the Local Plan:
- 1 The site should be added to Core Policies 4a and 8a as an additional allocation of up to 80 dwellings.
 - 2 A Site Development Template for Land west of Steventon Road, Drayton should be added to Appendix A, Part 4 (Abingdon-on-Thames and Oxford Fringe Sub-Area)

Appendix 1: Site Location Plan



Key

Site boundary (area 3.52ha)



LICHFIELDS

Project	Land West of Steventon Road, Drayton
Title	Site Location Plan

Client	Earl of Plymouth Estates Limited
Date	21.11.2017
Scale	1:1000 @ A3
Drawn by	LH
Dwg. No	PS15864-03-002

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Appendix 2: Concept Masterplan

Key

Site boundary (area 3.52ha)

Indicative developable area (2.68ha including access roads)

Indicative built frontage

Open space

Focal open space

Indicative access from Lockway

Stretch of re-routed bridleway

Local access road network

Existing trees*

Retained hedgerow*

Indicative proposed new planting

Structural views

Public bridleway

Potential new footpath/cycleway links

* Location informed by aerial imagery source: Google Earth Pro, 2017.



0 20m 40m 60m

60m

LICHFIELDS

Project

Land West of Stevenston Road, Drayton

Title

Illustrative Concept Masterplan

Client

Earl of Plymouth Estates Limited

Date

14.11.2017

Scale

1:1000 @ A3

Drawn by

LH

Dwg. No

PS15864-03-001

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UD/C/L15864-03

Appendix 3: Transport and Highways Site Appraisal



TRANSPORT AND HIGHWAYS SITE APPRAISAL



SYSTRA

LAND WEST OF STEVENTON ROAD, DRAYTON

TRANSPORT AND HIGHWAYS SITE APPRAISAL

IDENTIFICATION TABLE

Client/Project owner	Cooke and Arkwright co/ Lichfields
Project	Land west of Steventon Road, Drayton
Study	Transport and Highways Site Appraisal
Type of document	Report
Date	21/11/2017
Reference number	106480
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APPROVAL

Version	Name		Position	Date	Modifications
1	Author	Jon Williams	Assistant	21/11/2017	
	Checked by	Richard Stacey	Director	21/11/2017	
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1. INTRODUCTION

1.1 Context

- 1.1.1 This Transport and Highways Site Access Appraisal (SAA) has been prepared by SYSTRA to review and consider the key transport and highways opportunities and constraints associated with the promotion of a site through the Local Plan (LP) process, for a residential allocation.
- 1.1.2 The proposed site allocation for development is entirely within the control of one land ownership located on land west of Steventon Road, Drayton, to the west of the existing settlement. The site is bordered to the east by dwellings on Lockway Road, to the north by Kiln Lane, to the east by the A34 and to the south by greenfield land. The site is accessed by Kiln Lane; a single lane track that bridges over the A34 for access to Manor Farm to the west and Lockway to the east. The site area proposed for initial development currently comprises part of an existing greenfield land.
- 1.1.3 The exact design and composition of the proposed allocation area for development has yet to be confirmed. However, the opportunity for residential use and the construction of up to approximately 80 dwellings has been identified on the site and it is this number which has been assumed for consideration within this report.
- 1.1.4 The local planning authority (LPA) is Vale of White Horse District Council (VWHDC) whilst the local highways authority (LHA) is Oxfordshire County Council (OCC).

1.2 Report Structure and Policy Considerations

- 1.2.1 This Transport and Highways Site Access Appraisal (SAA) considers the highway and transport matters associated with the potential allocation for residential development. It has been produced with consideration of key policies at a National, Regional and Local level. An allocation and future planning application will be assessed against this overall policy framework and it is important that either the site is in compliance or any departures from policy in transport terms can be justified on balance. The key transport policy considered is outlined below:

- National Planning Policy Framework (first published 2012)
- National Planning practice Guidance (NPPG) 'Travel Plans, Transport Assessments and Statements in Decision-Taking' (First Published March 2014);
- Vale of White Horse Local Plan 2031 Part 1 – Adopted Plan (2016);
- Vale of White Horse Local Plan 2031 Part 2 – Publication Version (2017);
- Oxfordshire Local Transport Plan – Connecting Oxfordshire LTP4 (2015);
- Science Vale transport and infrastructure improvements and those associated with Harwell expansion;
- Highways England (HE) Studies and modelling reports for the A34 review.

- 1.2.2 The content of this Site Access Appraisal is as follows:

- **Chapter 2: Policy and Guidance Review** - Outlines the national and local policies which will be examined as part of the Transport Assessment;

- **Chapter 3: Existing Situation** – Provides an overview of the site’s existing use and the current transport conditions prevailing at the site and in the immediate surrounding area;
- **Chapter 4: Committed Developments** - Presents an overview of the committed developments in the District, including a review of associate S106 and S278 contributions;
- **Chapter 5: Committed Scheme Review** - Provides a review of the committed transport schemes coming forward in the local area which may have an impact on the deliverability of the site;
- **Chapter 6: Trip Generation Analysis** - Details the trip rates proposed to estimate the vehicle movements generated by the Site, and provides details of the multi-modal split of trips;
- **Chapter 7: Transport Issues, Improvements and Mitigation** – Assesses the potential transport measures and improvements that may be required to be delivered with any development on site; and
- **Chapter 8: Initial Recommendations and Strategy** – Provides an overarching assessment of the site in terms of its transport issues, likely timescales for the delivery, initial indication of improvement costs and possible phasing options.

2. POLICY AND GUIDANCE REVIEW

2.1 National Policy

National Planning Policy Framework NPPF (2012)

- 2.1.1 The NPPF was first published on 27 March 2012. It came into effect immediately, superseding all other national planning policy (except on waste).
- 2.1.2 The document sets out the government's economic, environmental and social planning policies for England and its expectation for their application. It is meant as high level guidance for local councils to use when defining their local and neighbourhood plans. This approach allows the planning system to be tailored to reflect the needs and priorities of individual communities.
- 2.1.3 The essence of the document is to support sustainable development, defined as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs' (p.2).
- 2.1.4 The NPPF defines the delivery of sustainable development through three roles:
- Planning for prosperity (an economic role);
 - Planning for people (a social role); and
 - Planning for places (an environmental role).
- 2.1.5 It notes that to achieve sustainable development, these roles should be sought jointly and simultaneously through the planning system.
- At the heart of the NPPF is a presumption in favour of sustainable development which 'should be seen as a golden thread running through both plan making and decision taking' (Paragraph 14). In paragraph 15, it goes on to say that 'Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay'.
- 2.1.6 A sustainable transport mode is described as 'any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport' (Annex 2, p.57).
- 2.1.7 Paragraph 32 states that developments that generate significant amounts of movement should be supported by a Transport Statement and Transport Assessment. It goes on to state that 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 sustainable access to the Site can be achieved for all people; and
 - Improvements can be undertaken within the transport networks that cost-effectively limit the significant impacts of the development. Developments should

only be prevented or reused on transport ground where the residual cumulative impacts of development are severe’.

- 2.1.8 Paragraph 34 seeks to ensure that ‘developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised’.
- 2.1.9 Paragraph 35 goes on to state that ‘plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of good or people’. Therefore, developments should be located and designed where practical to:
- ‘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 that 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 ultra-low emission vehicles; and
 - Consider the needs of people with disabilities by all modes of transport’.

2.2 Local Policy

Vale of White Horse Local Plan 2031 Part 1 – Adopted Plan

- 2.2.1 The Vale of White Horse (VWH) Local Plan 2031 Part 1 was adopted on 14 December 2016 and provides a policy framework for the delivery of sustainable development across the district up to 2031. The plan outlines the Spatial strategy and strategic policies which guide development by identifying the number of new homes and employment opportunities to be provided in the area in addition to retail, leisure and commercial growth and the supporting infrastructure.
- 2.2.2 The plan housing target reflects the Strategic Housing Market Assessment (SHMA) which sets out how many new homes are required for each district up to 2031.

Sub-Area Strategies - Abingdon-on Thames and Oxford Fringe Sub-Area

- 2.2.3 Drayton is located within the Abingdon-on-Thames and Oxford Fringe Sub-Area which lies to the north of the Vale District and has strong functional links with the city of Oxford, Abingdon and key employment hubs at Milton Park, Didcot and Harwell Campus.
- 2.2.4 In order to ensure a locally distinctive Local Plan, the following specific policy applies to the Abingdon-on-Thames and Oxford Fringe Sub-Area:
- Core Policy 12: Safeguarding of Land for Strategic Highway Improvements which seeks to protect land needed for the delivery of highway schemes within the area.
 - Land is safeguarded to support the delivery of the following identified transport schemes:
 - South Abingdon-on-Thames Bypass linking the A415 to the West and South East of the town, including a new River Thames crossing

- Diamond Interchange at the A34 Lodge Hill Junction
- Land for improvements to Frilford Lights.

2.2.5 Paragraph 6.76 states that transport improvements and off-site mitigation will be funded through developer contributions, including Community Infrastructure Levy (CIL). The CIL Regulation 123 List outlines that road network, cycleway and footpath improvements will be funded through CIL contributions, with the exception of schemes outlined within the exclusions list.

Strategic Objectives

In order to address the key challenges and opportunities for the Vale a series of strategic objectives have been developed to deliver the Spatial Vision for the Vale:

- Sustainable transport and accessibility
 - SO 8: Reduce the need to travel and promote sustainable modes of transport.
 - 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.

District Wide Policies

2.2.6 A district wide assessment has been undertaken in partnership with Oxfordshire County Council concluding that the impact of the strategic growth is acceptable, subject to the implementation of comprehensive highway infrastructure and public transport improvements.

2.2.7 It is noted that the proposed housing growth will place increased pressure on the road network, as such a number of measures are proposed to mitigate the impacts:

- Delivery of a comprehensive package of new highway infrastructure;
- Significant improvements to public transport and measures to encourage sustainable travel choices; and
- Provision of a TA and TP to mitigate the impacts of major development.

2.2.8 VWH District Council has secured external funding in conjunction with Oxfordshire County Council towards strategic highway infrastructure (£26.1 million, Sept 2014), including contributions from Oxfordshire and Oxford City Deal and Local Growth Fund in addition to significant contributions from Oxfordshire LEP towards new highway infrastructure.

2.2.9 In addition to the site-specific proposals and policies relating to transport in the sub-areas, a number of policies apply across the whole district to encourage sustainable modes of transport and a reduction in travel:

- Core Policy 33: Promoting Sustainable Transport and Accessibility
 - Outlines the Council's commitment to continue working with Oxfordshire County Council to promote sustainable transport and accessibility in addition to increasing safety, improving air quality and making settlements more attractive;
- Core Policy 34: A34 Strategy

- HE is preparing a Route Based Strategy for the A34 to promote movement between the Midlands and the Solent comprising a number of traffic management options such as ramp metering, speed control, rationalisation of laybys and lorry services, measures to promote bus lanes for shorter journeys, widening of the A34 and alternative alignment options. CP34 also includes a commitment to monitor air quality, specifically towards the Oxford Meadows SAC.
- Core Policy 35: Promoting Public Transport, Cycling and Walking
 - The promotion of public transport and active travel as part of new developments should be complemented with the provision of new services and facilities, largely funded through S106 agreements, connecting new services and key routes to the proposed housing growth. This is particularly targeted towards rural settlements who are dependent on car travel and would seek to improve the existing network in partnership with Oxfordshire County Council and other stakeholders.
- Core Policy 36: Electronic Communications
 - Support the provision of superfast broadband infrastructure to all new developments to reduce the need to travel.

**Vale of White Horse Local Plan 2031 Part 2 – Detailed Policies and Additional Sites
Publication Version (2017)**

2.2.10 The ‘Publication Version’ of the Vale of White Horse Local Plan Part 2: Additional Sites and Detailed Policies, is intended for submission to the Secretary of State in February 2018 for independent public examination. A six week consultation period will take place between 11 October to 22 November.

Sustainable Transport opportunities

2.2.11 There are concerns associated with highway impact from development at Marcham and the village is identified as an Air Quality Management Area (AQMA). It is considered that the majority of additional traffic associated with the proposed allocations at Marcham would travel towards Oxford, Abingdon-on-Thames and Science Vale (i.e. away from Marcham) and that new opportunities exist for improved public transport, cycling and walking connections in this area. Notably, VWHDC are satisfied that the relatively small development of 90 dwellings proposed to the east of Marcham will not adversely impact the AQMA.

2.2.12 The District Council is already working in partnership with Oxfordshire County Council to plan for substantial highway and public transport improvements within this Sub-Area. Plans include provision for upgrading the A34 interchange at Lodge Hill, providing for two new Park and Ride sites for accessing Oxford (at Cumnor and Lodge Hill, both close to Dalton Barracks) and the potential for a north-bound bus lane between Lodge Hill and the Hinksey interchanges on the A34.

Safeguarding of land for strategic highway improvements

2.2.13 LPP1 recognises some transport related constraints in the area including access to the A34 at Abingdon-on-Thames and Botley, and the Drayton Road (B4017) accessing Abingdon on-

Thames from the south. Therefore, in addition to land safeguarded for identified transport schemes set out in CP12 (Local Plan 2031: Part 1) the following schemes are also safeguarded:

- Park and Ride site for accessing Oxford from the A420 corridor at Cumnor;
- Park and Ride site for accessing Oxford from the A34 corridor at Lodge Hill;
- Single carriageway north-bound bus lane between the Lodge Hill A34 Interchange and Hinksey A34 Interchange;
- Provision for a public transport and cycle link between Dalton Barracks and the Lodge Hill Park and Ride site; and
- South Marcham Bypass linking the A415 to the west of Marcham and east of Marcham.

LPP2 Transport Policies

2.2.14 The transport policies set out within LPP2 are:

- Development Policy 16: Access – which sets out the key requirements for suitable and safe access within development proposals;
- Development Policy 17: Transport Assessments and Travel Plans – which provides additional guidance on the information required within Transport Assessments or Statements and Travel Plans;
- Development Policy 18: Public Car Parking in Settlements – which seeks to protect and improve the quality of car parks in appropriate settlements such as rural locations where people may not have access to public transport or other sustainable options; and
- Development Policy 19: Lorries and Roadside Services – which seeks to enable and focus lorry and roadside services at appropriate locations including the Milton Interchange on the A34.

Oxfordshire Local Transport Plan: Connecting Oxfordshire (LTP4)

2.2.15 Connecting Oxfordshire is Oxfordshire County Council's Local Transport Plan (LTP4), setting out the strategy and policies for developing the county's transport system between 2015 and 2031.

2.2.16 Connecting Oxfordshire has been developed with three over-arching transport goals (economy, environment and society), each with their own strategic objectives:

- To support jobs and housing growth and economic vitality;
 - Maintain and improve transport connections to support economic growth and vitality across the county;
 - Make the most effective use of all available transport capacity through innovative management of the network;
 - Increase journey time reliability and minimise end-to-end public transport journey times on main routes; and
 - Develop a high-quality, resilient integrated transport system that is attractive to customers and generates inward investment.
- To reduce emissions, enhance air quality and support the transition to a low carbon economy; and

- Minimise the need to travel;
- Reduce the proportion of journeys made by private car by making the use of public transport, walking and cycling more attractive;
- Influence the location and layout of development to maximise the use and value of existing and planned sustainable transport investment;
- Reduce per capita carbon emissions from transport in Oxfordshire in line with UK government targets.
- To protect and enhance Oxfordshire's environment and improve quality of life (including public health, safety and individual wellbeing).
 - Mitigate and wherever possible enhance the impacts of transport on the local built, historic and natural environment; and
 - Improve public health and wellbeing by increasing levels of walking and cycling, reducing transport emissions, reducing casualties and enabling inclusive access to jobs, education, training and services.

2.2.17 The Plan outlines the Council's intention to work with Highways England to implement schemes to improve key junctions and traffic management on the A34, the key north-south road through Oxfordshire. It is also noted that a longer-term solution is needed to address the congestion associated with the planned development and trip growth.

Transport Challenges and Opportunities

2.2.18 Due to the high number of jobs and the shortage and cost of housing in the city, more people commute to Oxford from outside the city than are working residents. It is noted that if the existing travel patterns continue, the number of sole occupancy car journeys will exceed the capacity of the highway network due to a net influx of commuters into Oxford. As such, by connecting housing with shops, schools and employment growth, there is huge potential to reduce the need to travel, encouraging more active travel and reducing the reliance on car trips.

2.2.19 The plan also outlines the high level of car usage and car ownership, particularly outside of Oxford. 87% of households own a car – compared with only 67% in Oxford. This is reflected in the high proportion of journeys made by car outside Oxford, including a large number of short trips within the county's towns. Although 50% of journeys to central Oxford are by bus, most of the city's jobs are in the more outlying areas to the east of the city, which are less accessible by public transport.

2.2.20 Before developing schemes for additional road space, OCC is keen to explore ways to make existing road space accommodate more vehicle trips. There is great potential across the county to make junctions work more efficiently through investment in updating the management of traffic signals, and coordinating them so that they work together to smooth traffic flows and improve cyclist safety.

Smarter Travel

2.2.21 The plan outlines OCC's ambition to become a smart county that makes transport a simple, positive experience that helps attract an agglomeration of knowledge industries. OCC encourages the use of innovative transport solutions such as a greater involvement of intelligent transport systems in traffic management and the deployment of autonomous or semi-autonomous vehicle technology. These options should also be considered in line with

Local Plan Part 1 CP36, outlining the Council's desire to provide a superfast broadband network to reduce the need to travel.

Park and Ride

- 2.2.22 The Plan states that Park & Ride sites have been incredibly successful in reducing traffic in the city centre and supporting the city's economic growth by providing an easy and attractive option for visitors entering the city. However, there are already delays at all approaches to the ring road, with particular hotspots located to the west (A420, A40), north-west (A44) and south (A34, A4074) during the morning peak period.
- 2.2.23 Future housing and employment growth within Oxfordshire is set to further exacerbate congestion on the corridors that feed into the city. In order to reduce congestion on the approaches to Oxford, it will be necessary to update and expand Oxford's Park & Ride system, and 'intercept' more car trips further away from the city. Six new outer Park & Ride sites, each with 1,000+ car parking spaces are proposed, plus a further expansion of the existing Thornhill site, linked to rapid transit and premium bus routes serving the major employment and housing growth areas of the city centre, North Oxford and the Eastern Arc.
- 2.2.24 The County Council will commission a study to look at this in more detail to identify:
- the location of the new sites;
 - what infrastructure will be required to make these sites attractive;
 - what role do the existing sites play; and
 - what the phasing should be for the new sites.

Better Integrated Public Transport

- 2.2.25 It is of note that a large proportion of journeys to Oxford city centre are by bus and rail, however there is a significant opportunity to increase public transport use on journeys to other parts of the city, within other towns, and along inter-urban routes, which remains to be a challenge. In order to achieve this, the use of public transport needs to be seamless through the integration of journeys involving multiple modes of transport.
- 2.2.26 The plan states that:

'Oxfordshire County Council will work with operators and other partners to enhance the network of high quality, integrated public transport services, interchanges, and supporting infrastructure, and will support the development of quality Bus Partnerships and Rail Partnerships, where appropriate'

- 2.2.27 The Plan states that for short trips, access can be significantly improved through better walking and cycling links. When developing walking and cycling networks for towns, we will ensure that they include connections to areas that are less well served by public transport, and in particular, areas with higher levels of deprivation.
- 2.2.28 For longer trips and where walking or cycling is not an option, OCC promote the combination of public transport with walking or cycling as a viable solution. Further to this taxis provide a much needed service to people with disabilities, therefore OCC are keen to support adequate waiting and drop off facilities in town centres. However, due to the high cost of taxi usage,

OCC is keen to develop to scope, design, test, and implement a family of vehicle hire and ride sharing technologies focused on bike hire, car share, car clubs and other on-demand vehicle services in addition to supporting the development of autonomous vehicles.

Reducing Emissions

- 2.2.29 OCC's approach to reducing the pressure on transport networks and the associated environmental impact is to reduce the amount of vehicular travel per head by making travel unnecessary for some people. In doing so, and by reducing the distance between spaces of employment and housing growth areas, commuting journeys will become shorter, further promoting walking and cycling as a priority mode of travel.
- 2.2.30 Through strategic planning across the county, OCC will influence the location of development to minimise the need for car travel in particular, and ensure that where new infrastructure is required, it can be justified and is affordable. Developments should give priority to walking and cycling, and have access to high quality public transport facilities.

Influencing travel choice

- 2.2.31 It is of note that providing people with excellent public transport, cycling and walking facilities, as well as information about travel options, will not be enough to bring about the shift that we need from car use to other forms of transport. As such, interventions are required such as the Oxfordshire journey planner to help inform travel choices allowing more seamless travel. This tool will encourage people to take the quickest option for them which also optimises the capacity of transport networks. OCC support the use of a wide range of data and information technology to assist in managing the network and influencing travel behaviour.

Promoting independence amongst older and disabled users

- 2.2.32 OCC are committed to ensuring that transport systems themselves are as inclusive as possible and will also work closely with public transport operators to ensure that vehicles and infrastructure are fully accessible. This will be supported through the implementation of a Vulnerable Road User Audit on the design of all new schemes to fully understand the impacts upon older and disabled people.

Delivering Connecting Oxfordshire

- 2.2.33 Capital funding for local transport projects is received through the Local Growth Fund (LGF) whereby the LUP considers the business case presented. In addition, applications can be made to the Local Sustainable Transport Fund (LSTF) for consideration by DfT. Further private sector funding is to be provided through S278 agreements or CIL.

2.3 Summary

- 2.3.1 This chapter has provided a summary of the relevant national and local policies and has shown that the key policies with which the proposed allocation for development should seek to comply with are:

- The proposed development is highly accessible by public transport, walking and cycling, and the use of these forms of transport by residents and visitors to the Site should be encouraged;
- The proposals would not have a severe impact on the operation of the local highway network cause residual cumulative impacts that are severe in terms of road safety or operation, or cause unacceptable environmental intrusion;
- The proposed development would not prejudice the construction or effective operation of the transport schemes listed in LPP2;
- Through the appropriate level of CIL, the proposed development could help progress the delivery of the South Abingdon Bypass, which is seen as a potential long term approach to alleviating traffic congestion to the south of Abingdon.

3. BASELINE CONDITIONS

3.1 Introduction

- 3.1.1 This section of the SAA describes the baseline transport conditions of the existing site and the surrounding area, with a focus on local transport infrastructure and services. The baseline conditions need to be established to fully understand the context of the proposed allocation of the site for development and the associated traffic and transport impacts.

3.2 Site Location

- 3.2.1 The proposed site allocation for development is within one landownership located on land west of Steventon Road, Drayton, to the west of the existing settlement. The site is bordered to the east by dwellings on Lockway Road, to the north by Kiln Lane, to the east by the A34 and to the south by greenfield land. The site is accessed by Kiln Lane; a single lane track that bridges over the A34 for access to Manor Farm to the west and Lockway to the east. The site area proposed for development currently comprises part of an existing greenfield land.
- 3.2.2 Further details of the proposed access options are provided in Chapter 7 of this report.

3.3 Walking and Cycling

- 3.3.1 To enable an assessment of the viability of walking between the site and key destinations in the local area, it is appropriate to establish the maximum distance that people are generally prepared to walk and the residential areas and destinations that exist within these distances.
- 3.3.2 The IHT's guidance, Guidelines for Providing for Journeys on Foot (2000) states in paragraph 3.32 and Table 3.2 that the preferred maximum walking distance to facilities and local services is circa two kilometres. The distances for various land uses are summarised in Table 3.1 below.

Table 3.1. IHT Walking Distances (metres).

DEFINITION	COMMUTING	ELSEWHERE
Desirable	500m	400m
Acceptable	1,000m	800m
Preferred Maximum	2,000m	1,200

- 3.3.3 A Public Bridleway (192/2/40 - 198/1/10) is present on Kiln Lane which routes in a westbound direction from the Kiln Lane / Steventon Road junction for approximately 4.6km, where it meets the A338. At the Steventon Road junction, there are dropped kerbs and tactile paving at present. Approximately 100m to the east of the potential central access point is the Kiln Way / Lockway Junction, where dropped kerbs are also provided. To the south, Lockway leads to Drayton Hall, and to the north Whitehorns Way and Marcham Road. Kiln Lane itself is not currently street lit, and is lined with dense hedgerows in the immediate surroundings of the proposed site access. The surrounding streets (eg.: Whitehorns Way and Marcham Road are street lit, along with the B4017).

- 3.3.4 Footways of approximately 1.5-2m are present at the Kiln Lane / Lockway junction which provide access to a number of local amenities and bus stops.
- 3.3.5 Cycling is considered an important mode of sustainable travel and is generally considered suitable for distances of up to 3 miles (4.8km) for regular journeys in urban areas, and 5 miles (8km) for commuting journeys (source: LTN 2/08, Cycle Infrastructure Design).
- 3.3.6 The Hanson Way and Thames Valley National Cycle Route 5 (NCR5) passes east of Drayton and the proposed development site. NCR5 can be accessed approximately 2km east of the site access point, via Kiln Lane, High Street and Drayton Road. NCR5 routes from Reading in the south to Lichfield in the north and passes through, among others, Oxford, Banbury, Stratford-upon-Avon and Birmingham. NCR5 runs predominantly on a combination of on-road and quiet off-road sections.
- 3.3.7 The topography and associated gradients of the routes to local services are conducive to walking and cycling. There are no material barriers to movement.

3.4 Public Transport

Bus

- 3.4.1 The proposed development site lies within close proximity to four bus stops along B4017 Abingdon Road, all of which are served by the X2 bus service. The existing Bridleway (192/4/50) / Lockway / Abingdon Road can be used to access the 'East Way Northbound' and 'East Way Southbound' bus stops which are located approximately 200m and 265m away from the southern boundary of the site respectively. Two additional bus stops (The Green Northbound and The Green Southbound) are located on either side of the carriageway on B4017 Abingdon Road in the centre of the Village which are 395m and 445m away from the site respectively.
- 3.4.2 IHT's Guidelines for Planning and Public Transport in Development (1999) states that new developments should be located 400m from the nearest bus stop. As aforementioned, the site is within approximately 200m of the nearest bus stop and makes use of footways on Lockway and Abingdon Road.
- 3.4.3 The East Way bus stops provide a bus flag on both sides of the carriageway road along with timetabling information. A public telephone box is also located adjacent to the East Way southbound bus stop. The Green bus stops are both with shelter facilities, appropriate seating and adequate bus cages. The Green Southbound bus stop is also provided with real-time passenger information (RTI).
- 3.4.4 The four bus stops within the vicinity of the site are served by the X2 bus which operates a high frequency, express service to a number of major employment, retail and city centre locations in addition to a mainline rail station. The X2 service operates 19 hours a day which ensures that the use of public transport is an attractive and viable mode of travel for commuter and leisure trips for potential future residents. A summary of local bus services from the stops stated above is provided in Table 3.2.

Table 3.2. Summary of Bus Routes

NO.	ROUTE	WEEKDAY			WEEKEND	
		Approx. Frequency	Service Times		Approx. Frequency	
			First Bus	Last Bus	Sat	Sun
34	Oxford - Abingdon - Harwell Campus - Wantage	2 Services during Peaks	07:23	18:19	No Service	No Service
BB1	Abingdon - Didcot Schools	2 Services during Peaks	07:55	15:49	No Service	No Service
BB1A	Iffley (Oxford) - Didcot Schools	1 Service during Peaks	07:55	15:49	No Service	No Service
X2	Oxford - Abingdon - Milton Park - Didcot - Wallingford	30 mins	05:08	23:56	30 mins	Hourly

Source: Traveline South East (16/11/17)

Rail

- 3.4.5 Didcot Parkway Railway Station is located approximately 5.5 miles from the proposed development site which equates to a 25 minute bus journey via the X2 service. The station provides local services operated by Great Western Railway to Reading and Oxford, in addition to mainline services to these stations and London Paddington, Bristol and South Wales.

Local Amenities

Table 3.3. Key Local Facilities

FACILITY	DISTANCE FROM SITE (METRES)	WALKING TIME (1.4 M/S)	CYCLING TIME (5.5M/S)
Drayton Hall and playing fields	310	3-4 mins	1 min
Public House (there are two in the village)	360	4-5 mins	1 min
Hardware Retailer	380	4-5 mins	1 min
Post Office and Convenience Store	430	5 mins	1-2 mins
Church (there are two in the village)	450	5-6 mins	1-2 mins
Drayton Community Primary School	680	8 mins	2 mins
Recycling Centre	910	11 mins	3 mins
Golf Club and coaching complex	1000	12 mins	3 mins

- 3.4.6 The summary in Table 2.3 shows that all key facilities in the village are within a 15 minute walk of the proposed site access (at this stage, distance measurements are being taken from the access point outlined above). While in practice the routes to all key facilities are unlikely to be direct, the requirement to minimise travel time for pedestrians along key desire lines will be taken into consideration through the internal design of the development.
- 3.4.7 While there is currently not a secondary school in Drayton village itself, this is not unusual for a settlement of its size. There are schools of this level in Abingdon, Oxford and Didcot. The 34 bus route provides access to the schools in Abingdon and Oxford, the BB1 to schools in Abingdon and Didcot and the BB1A to schools in Oxford, Abingdon and Didcot.
- 3.4.8 There are a number of employment opportunities in the area surrounding the development site. Oxford centre can be accessed using the 34 bus at peak times and the X2. Abingdon centre can be accessed using the BB1 and BB1A during peak hours. The Milton Park business hub, where around 230 organisations have operations, is located approximately 4.5km from the development site and can be accessed using the X2 bus service. The journey is approximately 15 minutes from The Green in Drayton.

3.5 Local Highway Network

B4017 Abingdon Road

- 3.5.1 B4017 Abingdon Road is a single carriageway road which routes from south to north through Drayton Village and is subject to 30mph speed limits. The carriageway ranges between approximately 6m – 7.5m in width in the vicinity of the proposed development which is acceptable for two vehicles to pass at this speed and appropriate for the setting and characteristics of the area.

Kiln Lane

- 3.5.2 Kiln Lane is a single track private road, approximately 3.6m in (existing) width that runs east to west and adjacent to the central site access point. Approximately 270m east of the site is the Kiln Lane / Steventon Road (B4017) junction. West of the central site access, Kiln Lane bridges over the A34 and provides access to Manor Farm.

3.6 Strategic Highway Network

A34

- 3.6.1 The A34 can be accessed at the A34 / Marcham Road junction approximately 4.5km north of the central site access point via the B4017 and Marcham Road. Also providing access to this highway is the A34/ Milton Park junction, approximately 4km south of the central site access point via the B4017 and A4130.

3.7 Personal Injury Accident (PIA) Analysis

- 3.7.1 A review of the most recent five years of injury data on the www.crashmap.co.uk website demonstrates that there have been eight PIAs within the village of Drayton. Of these, seven were slight and one was serious. Four slight injury accidents occurred on High Street (B4016) which runs west-east from the B4017 / B4016 junction, between 580m – 800m from the

central site access point. Two further slight PIAs took place at the Marcham Road / B4017 junction approximately 370m from the central site access, while the remaining slight PIA occurred on Lyford Close on the north side of Drayton Community Primary School, approximately 900m from the central site access.

- 3.7.2 The serious PIA involved a cyclist at the Marcham Road / Abingdon Road junction and it was the only vehicle involved.
- 3.7.3 No existing road safety issues have been identified within the immediate vicinity of the site which may be exacerbated as a result of the potential development. However, injury collisions will be subject to further investigation to establish cause prior to a planning application.
- 3.7.4 Further to this it is of note that the Miller Homes development (ref. P14/V2504/FUL) to the north of Drayton includes proposals to relocate the existing 30mph signs and roundalls 90m north of their present position and introduce a gateway feature to ensure motorists entering the village will be driving at the correct speed and to improve overall safety.

3.8 Journey to work data

- 3.8.1 Journey to Work data has been used to provide an indication of overall travel patterns in the area by highlighting the initial modal share to form a robust assessment into the likely distribution of trips associated with the potential future residents. The site is located within Vale of White Horse 010 Mid-level Super Output Area (MSOA) which includes the village of Drayton, Steventon and Sutton Courtenay. Table 3.4 shows how people within this MSOA currently travel to work, as obtained from 2011 Census Journey to Work Data.

Table 3.4. 2011 Census Modal Split

MODE	COUNT	MODE SHARE
Car Driver	2575	74%
Car Passenger	152	4%
Taxi	6	<1%
Bus	87	3%
Rail	246	7%
Motorcycle	45	1%
Bicycle	139	4%
Walking	218	6%
Other	8	<1%
Total	3480	100%

- 3.8.2 The data shows that 10% of journeys to work in the MSOA utilise public transport (3% via buses and 7% utilising the railway). Didcot Parkway Railway Station is accessible by a short bus journey from the proposed development and offers frequent services to key destinations. Other sustainable modes, such as cycling (4%) and walking (6%), make up 10% of all trips. In

total 74% of people travel to work by driving a private car. The remainder of people travelled by other modes, such as by motorcycle.

- 3.8.3 Table 3.5 outlines the most frequent work destinations by residents of the MSOA studied in addition to the associated modal split. This provides an indication of overall travel patterns in the area, with travel to work being one of the main trip purposes during the traditional peak hours.

Table 3.5. 2011 Census Journey to Work Destinations

	SOUTH OXFORDSHIRE	OXFORD	ABINGDON	MILTON PARK	CHERWELL	READING	LONDON	WEST BERKSHIRE
Total	559 (16%)	387 (11%)	458 (13%)	426 (12%)	71 (2%)	87 (3%)	116 (3%)	174 (5%)
Car	85%	81%	73%	61%	85%	67%	7%	96%
Car Passenger	6%	3%	7%	6%	4%	3%	~1%	2%
Train	1%	6%	~1%	0%	~1%	25%	87%	0%
Bus	3%	6%	8%	2%	4%	0%	0%	1%
Bicycle	4%	1%	8%	14%	0%	2%	~1%	~1%
On Foot	1%	1%	3%	15%	3%	0%	~1%	~1%
Other	1%	3%	~1%	2%	3%	2%	3%	0%

- 3.8.4 It is noted that much of the Vale of White Horse 010 comprises the villages of Drayton, Steventon and Sutton Courtenay, all of which have a small number of local amenities, as outlined in Table 3.3. However, as summarised in Table 3.5 a high proportion of residents from within MSOA work within South Oxfordshire including Newbury and Harwell Campus in addition to Abingdon, Oxford and Milton Park.

3.9 Summary

- 3.9.1 This section has demonstrated that the proposed site allocation for development is located in an accessible location with a number of key local facilities catering for 'daily needs' within an acceptable walking distance of the proposed development. A number of walking and cycling links are also available within the local area. The development is also located within close proximity to local bus stops off of the B4017 which are served by a frequent bus service connecting the site to major employment areas such as Milton Park in addition to Oxford, Abingdon and Didcot Station.
- 3.9.2 Vehicle access to the proposed site is to be provided on Kiln Lane which would connect the site direct to the local highway and onwards to the strategic road network. It is therefore considered that in terms of sustainability and overall access, the site is well positioned through the proximity to a range of bus stops which are served by the frequent X2 bus service in addition to the position of the site in relation to the local and strategic highway network.

- 3.9.3 Collision data will be subject to further investigation to establish cause, and any mitigation necessary will be proposed as part of any future planning application but an initial assessment does not indicate a highway safety issue.
- 3.9.4 The potential site allocation for development therefore provides access to a number of facilities by means of walking, cycling and bus travel and as such will encourage sustainable travel in compliance with national, regional and local policy objectives.

4. COMMITTED DEVELOPMENTS

4.1 Land South of High Street, Drayton (ref. P15/V2447/FUL)

- 4.1.1 Planning permission for 140 dwellings to the west of Drayton Village has been granted by VWHDC. The application was submitted by Pegasus on behalf of Bloor Homes and comprised 140 new dwellings, a new access with High Street and the creation of new pedestrian and cycle routes. The site was an unallocated site within the adopted Vale of White Horse Local Plan 2011, however, together with two other sites in Drayton it was allocated in the Drayton Neighbourhood Plan as a site suitable for housing. Work on site has now started with earth moving to establish the internal estate roads. The site office is now open and the show houses are being constructed and will be open by the year end. A summary of the S106 contributions secured relating to transport for this development is outlined below:

- Footpath Noticeboard Contribution - £1,330.95;
- Cycle Paths Provision - £46,577.81;
- Total Transport sum per dwelling (£47,908/140 dwellings) - £342 per dwelling

4.2 Land West of Abingdon Road, Drayton (Ref. P14/V2504/FUL)

- 4.2.1 Miller Homes have been granted planning permission for 73 dwellings to the north of Drayton. The site, which is expected to be complete by the end of 2017, is to provide 73 high quality family homes to the west of Abingdon Road, Drayton. Vehicular access is provided via a new junction from Abingdon Road, which is of an appropriate width with the necessary visibility splays to accommodate traffic associated with the proposed development. The development also proposes to relocate the existing 30mph signs and roundalls 90m north of their present position and introduce a gateway feature. This should ensure motorists entering the village will be driving at the correct speed and improve overall safety. A summary of the S106 contributions secured relating to transport for this development is outlined below:

- Cycle Paths Contribution - £24,287.00;
- Footpath Improvement Contribution - £694.00;
- Total Transport sum per dwelling (£24,981.00/140 dwellings) - £384 per dwelling

4.3 Manor Farm Site, Drayton (Ref. P17/V2099/FUL)

- 4.3.1 CALA Homes have received VWHDC planning permission for 57 dwellings off Henleys Lane, Drayton. Construction started in August 2017 which included the development of the site entrance in addition to general clearing and levelling of the site. The site is allocated in the Drayton Neighbourhood Plan for new housing and the creation of a new Village Green.

4.4 Wider S106 / CIL Contributions

- 4.4.1 Table 1 of The Vale of White Horse Infrastructure Delivery Plan (IDP) provides a summary of the likely developer contributions in the form of S106 or CIL for strategic sites across the district. The number of units within the strategic sites ranged from 200 to 4,254 and the likely total contributions through S106 and CIL varied between approximately £11,500 - £31,000 per dwelling.

5. TRANSPORT SCHEME REVIEWS

5.1 Context

- 5.1.1 In order to assess the deliverability of the site in the context of wider transport infrastructure improvements, a number of schemes listed in key policy documents have been summarised below.

5.2 Vale of White Horse Local Plan 2031 Part 1 – Adopted Plan

Core Policy 12: Safeguarding of Land for Strategic Highway Improvements within the Abingdon-on-Thames and Oxford Fringe Sub-Area

- 5.2.1 The LPP1 identifies several highway constraints that, it is stated, will need to be addressed before further development can be considered within the area:
- Abingdon-on-Thames and Botley are constrained by congestion from traffic accessing Oxford via the A34, the Botley Interchange, including traffic accessing Oxford from the A420 and Botley Road; and
 - Drayton Road (B4017) is a key route into Abingdon-on-Thames from the south. This road already suffers from significant congestion in both the morning and evening peak periods, which results in long and unreliable journey times. The River Ock bridge and the double mini-roundabouts at the junction with Marcham Road/Ock Street are also physical pinch-points which restrict vehicle flow.
- 5.2.2 Paragraph 5.33 states that *‘the transport constraints at Abingdon-on-Thames are a key reason why strategic growth is not currently planned to the south of the town.’*
- 5.2.3 In order to address congestion at key interchanges, including the Drayton Road / Marcham interchange, and to ensure future development will not have a significant impact on the existing highway network, a number of land safeguarding schemes have been identified:
- South Abingdon-on-Thames Bypass linking the A415 to the west and south of the town, including a new River Thames crossing;
 - Diamond Interchange at the A34 Lodge Hill Junction; and
 - Land for improvements to Frilford Lights.

South Abingdon Bypass

- 5.2.4 In Core Policy 12 of The Vale of White Horse Local Plan 2031 Part 1 land has been safeguarded for Strategic Highway Improvements within the Abingdon-on-Thames and Oxford Fringe Sub-Area. Included within the land which is safeguarded is the delivery of a South Abingdon Bypass

which links the A415 to the West and South East of Abingdon. A diagram of the safeguarded route has been attached at **Appendix A**. CP12 outlines that *‘new development in these areas should be carefully designed having regard to matters such as building layout, noise insulation, landscaping and means of access’*. However, the policy also states that *‘any proposals for development that may reasonably be considered to impact the delivery of the identified schemes should demonstrate the proposal would not harm their delivery’*. Planning permission will not be granted for development that would prejudice the construction or effective operation of the transport schemes in CP12.

- 5.2.5 The South Abingdon Bypass is seen as a potential long term approach to alleviating traffic congestion to the south of Abingdon, and as such, *‘additional development to the south of Abingdon-on-Thames is inappropriate without the provision of this new bypass’¹*.
- 5.2.6 The Vale of White Horse Local Plan 2031 Part 1 ‘Summary of Transport Assessment Work’ also outlined the constraints surrounding potential development opportunities at sites south of Abingdon due to severe traffic congestion. Notably to Drayton, the document outlines North West Drayton as a problematic site and makes it clear that large scale development in this area could only take place if a new south Abingdon bypass was delivered. It is of note that the bypass could not be funded solely by development and to date there has been no other funding identified.

Diamond Interchange at the A34 Lodge Hill Junction

- 5.2.7 Also included within Core Policy 12 of LPP1 is the safeguarding of land for the delivery of a diamond interchange at the A34 Lodge Hill junction to the north of Abingdon which would develop south-facing slip roads. The delivery of this £18m improvement will largely be Government funded by the Department for Communities and Local Government (£9.45m over four years), in addition to shortfall developer funding for up to 950 homes to the north of Abingdon and The Oxfordshire LEP. The development of this junction improvement will reduce the existing strain on the Marcham interchange which is currently the only option to travel southbound on the A34 from Abingdon. Not only will the diamond interchange facilitate housing growth for up to 1,700 planned houses within Abingdon and reduce the strain on the local road network, it will support the growth in the wider Science Vale area, paving the way for up to the creation of up to 20,000 new jobs and houses by 2031.

Core Policy 17: Delivery of Strategic Highway Improvements within the South-East Vale Sub-Area

- 5.2.8 In order to deliver the growth in the South East Vale Sub-Area and the wider Science Vale area, the Science Vale Area Strategy has identified highways infrastructure to mitigate the impact of the planned growth across Science Vale and secure the future economic viability of the area, including:
 - access to the strategic road network, for example, improvements to the A34 at the Milton and Chilton junctions; and
 - relief to the road network at Rowstock and Harwell (including an improved junction configuration at Steventon Lights, upgrading Featherbed Lane and Hagbourne Hill).

¹ ATKINS (2014) Evaluation of Transport Impacts Assessment, available at: www.whitehorsedc.gov.uk/evidence

- 5.2.9 Land is safeguarded to support the delivery of the identified transport schemes listed by Core Policies 17 and 19. Planning permission will not be granted for development that would prejudice the construction or effective operation of the transport schemes listed.

Improvements to the A34 Milton junction

- 5.2.10 The development of a new interchange has been completed to provide a hamburger style roundabout layout which allows traffic from Didcot travelling westbound on the A4130 to route through the centre of the roundabout, connecting with the A34 northbound towards Oxford and the M40. The interchange improvement could boost capacity by up to 20% which will provide much needed congestion relief and improve traffic flow for Didcot, Milton Park and Harwell. The project has been designed to enable the local road infrastructure to meet the demands of the forecast increase in jobs and traffic in the area, resulting from an additional 14,000 homes and 16,000 jobs expected by 2029.

Reconfiguration of Steventon lights

- 5.2.11 LPP1 Core Policy 17 seeks contributions for *‘an improved signalised junction at the southern end of Steventon High Street / A4130 Abingdon Road’* to support the major growth in both housing and employment planned in the Science Vale area and mitigate the congestion at the Rowstock roundabout junction. The scheme includes three main sections:

- Northern end (Milton Hill) of Featherbed Lane
 - An improved signalised junction at the southern end of Steventon High Street / A4130 Abingdon Road.
 - A new set of traffic lights where Featherbed Lane meets the A4130 Abingdon Road.
 - Additional traffic lanes along the A4130 between these two improved junctions at either end.
- Central section of Featherbed Lane
 - Realignment of sharp double bends along Featherbed Lane.
- Southern end of Featherbed Lane
 - A new roundabout junction with the A417 Reading Road.
 - Improved surfacing of a section of the A417 Reading Road towards East Hendred.

- 5.2.12 These three sections will increase the junction capacity at the A417 / Featherbed Lane, A4130 / Featherbed Lane and A4130 / B4017 (Steventon) junctions and improve the journey time reliability and highway safety conditions of the local road network. The Vale of White Horse Infrastructure Delivery Plan (IDP) outlines a cost of £30,000,000 - £40,000,000 for the access to Enterprise Zone (EZ) package which includes improvements to Featherbed Lane and Steventon Lights. This project is led by OCC and as outlined in the IDP is to be funded by CIL.

6. TRIP GENERATION AND DISTRIBUTION ASSESSMENT

6.1 Proposal

- 6.1.1 The exact design and composition of the proposed development has yet to be confirmed, however an indicative plan has been produced which identifies the opportunity for residential

use in the order of up to 80 dwellings has been identified across the site to the south of Kiln Lane.

6.2 Trip Generation

6.2.1 Provisional trip rates have been obtained from an interrogation of the TRICS database version 7.4.2 to determine the likely trip rates for a proposed residential development. The development schedule is estimated for the purposes of this report and providing a guide to trip rates only and it does not constitute the final development scheme which will be the subject of any future planning application.

6.2.2 For the purposes of calculating provisional peak period trip rates, an approximate development quantum of up to 80 dwellings has been assumed.

6.2.3 The following primary parameters were selected within the TRICS database to calculate the trip rates for the proposed residential scheme:

- 03 Residential – Houses Privately Owned;
- Located in all regions excluding Greater London, Scotland, Wales and Northern Ireland;
- Located in a Neighbourhood Centre or Edge of Town;
- Survey date of 2009 onwards;
- Any weekday;
- Developments of up to 350 dwellings; and
- Excluding areas with a population over 10,000 within one mile or 75,000 within five miles.

6.2.4 Sites in a 'Neighbourhood Centre' or 'Edge of Town' were selected for a village such as Drayton as they are more likely to give a worst case scenario for the purpose of calculating provisional trip rates for this site.

6.2.5 Table 6.1 summarises the proposed provisional person trip rates.

Table 6.1. Proposed Provisional Person Trip Rates

	Trip Rates			Trips		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
AM Peak (08:00-09:00)	0.229	0.595	0.824	18	48	66
PM Peak (17:00-18:00)	0.372	0.14	0.512	30	11	41
12 Hour Period (07:00-19:00)	3.026	2.994	6.02	242	240	482

6.2.6 The results show that there would be up to a total of approximately 66 two way person trips in the AM peak (08:00-9:00), 41 two-way trips in the PM peak (17:00-18:00) and 482 two-way trips over a 12 hour day (07:00-19:00).

6.2.7 To estimate the multi modal trips generated, the Census Journey to Work percentages, outlined in Table 6.2, have been applied to the trip generation, outlined in Table 3.4. As such, the proposed development multimodal trip generations is outlined below in Table 6.2.

Table 6.2. Proposed Multi-Modal Trips

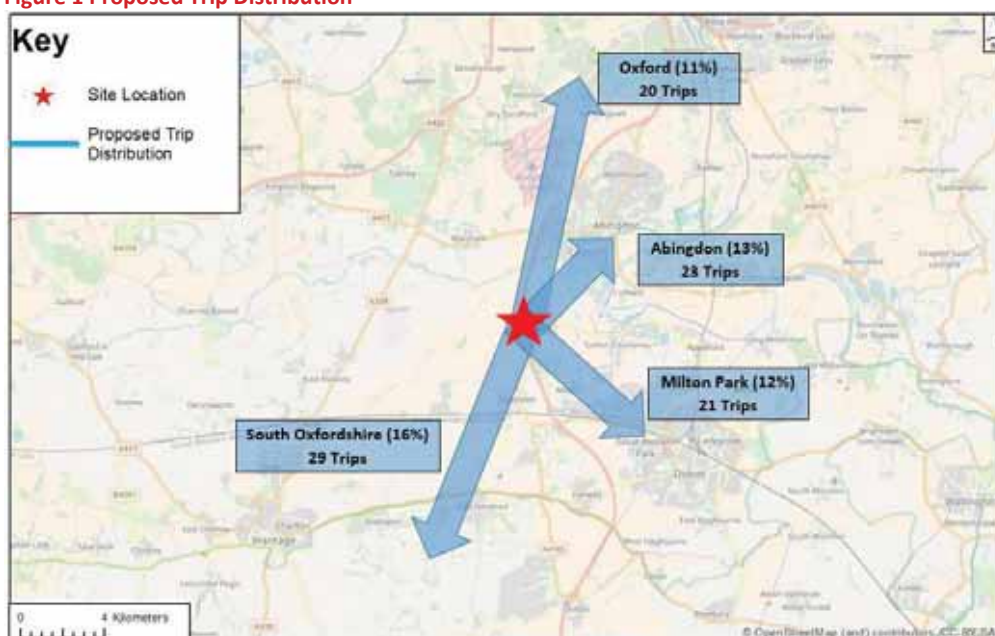
Mode	Mode Share	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			12 hour (07:00-19:00)		
		In	Out	Tot	In	Out	Tot	In	Out	Tot
Car Driver	74%	13	36	49	22	9	31	179	178	357
Car Passenger	4%	1	2	3	1	0	1	10	10	20
Taxi	0%	0	0	0	0	0	0	2	2	4
Bus	3%	1	1	2	1	0	1	7	7	14
Rail	7%	1	4	5	3	1	4	17	17	34
Motorcycle	1%	0	0	0	0	0	0	2	2	4
Bicycle	4%	1	2	3	1	0	1	10	10	20
Walking	6%	1	3	4	2	1	3	15	14	29
Total	100%	18	48	66	30	11	41	242	240	482

6.2.8 The assessment shows that the proposed development could generate up to approximately 49 two-way vehicle trips in the AM peak hour, approximately 31 two-way vehicle trips in the PM peak hour and approximately 357 two-way vehicle trips over a 12-hour day.

6.2.9 The proposed trips would be capable of being accommodated on the public transport network and would generate, as a low estimate based on observed census data, approximately 2 additional passengers on the X2 bus service during the peak periods which is considered to be within the average fluctuation in bus patronage during the peak hour and would help to stimulate bus usage within the area. Any Travel Plan associated with the site would seek to reduce car trips and further encourage bus use.

6.2.10 In order to provide a robust assessment into the distribution of development trips associated with the site, the vehicle trip generation for the 12 hour period has been distributed broadly using the 2011 Census Journey to Work data (Figure 1).

Figure 1 Proposed Trip Distribution



7. HIGHWAY ACCESS RECOMMENDATIONS

7.1 Context

7.1.1 Vehicle access to the proposed allocation site is to be provided on Kiln Lane.. This chapter outlines the initial highway access recommendations in relation to the access:

- Vehicle access via Kiln Lane, approximately 100m to the west of the Kiln Lane / Lockway junction.

7.1.2 A southern pedestrian access is being investigated, with the potential to connect with the existing bridleway (192/4/50) from Lockway. It is permissible to improve the surface of a PROW as part of the development to ensure suitability for pedestrian and cycle access. This will require the agreement of OCC and any new surface will need to be suitable for use as a bridleway.

7.2 Southern Pedestrian/Cycle Access

7.2.1 A southern access to be provided off the southernmost land parcel to the west of Lockway via the existing Bridleway (192/4/50) is being investigated. As shown on the image below, the existing bridleway is well. If feasible this access could provide a pedestrian and cycle access from the southern border of the site to the existing footways on Lockway via the Bridleway (192/4/50) and would also connect the site to within 400m of existing bus stops on Abingdon Road.

Figure 2 Existing Southern Access



7.3 Vehicle Access

- 7.3.1 The vehicle access would be located off Kiln Lane and would utilise the existing Kiln Lane / Lockway junction to connect the site to the local road network. As shown on the image below, the existing track is c3.6m wide, however use of the verges increases the effective width to serve as a potential vehicle access. Highway boundary has been received from OCC which identifies that the section of Kiln Lane to the west of its junction with Lockway is not within the extent of the adopted Highway Boundary and is within the client's ownership.
- 7.3.1 The development masterplan would incorporate an internal loop road arrangement to enable all movements by private vehicle, delivery vehicles and refuse vehicles to access and egress the site in forward gear. Initial visibility assessments have been carried out on the Kiln Lane / Lockway access junction which indicate that a 2.4m x 43m visibility splay can be achieved, within the highway boundary; which is in accordance with Table 7.1 of Manual for Streets (MfS) for a 30mph speed limit road. Lockway is subject to low traffic speeds and volumes and therefore the use of MfS visibility splays is considered representative. This proposed access option provides the most viable access option to the site and would be used by all private vehicles movements as well as refuse and delivery vehicles.

Figure 3 Existing Kiln Lane Access



8. INITIAL RECOMMENDATIONS

8.1 Context

- 8.1.1 This Transport and Highways Site Access Appraisal (SAA) has been prepared by SYSTRA to advise the client and with some minor changes provide a technical transport and highways evidence base to support the promotion of a site for residential development through the Local Plan (LP) process.
- 8.1.2 The proposed site allocation for development is within the client's ownership and is located on land west of Steventon Road, Drayton, to the west of the existing settlement. The site is bordered to the east by dwellings on Lockway Road, to the north by Kiln Lane, to the east by the A34 and to the south by greenfield land. The site is accessed by Kiln Lane; a single lane track that bridges over the A34 for access to Manor Farm to the west and Lockway to the east. The site area proposed for development currently comprises greenfield land.

8.2 Transport Issues and Mitigation

- 8.2.1 The proposed access provides the most viable access option to the site and would be used by all private vehicles movements as well as refuse and delivery vehicles. Initial visibility assessments have been carried out on the Kiln Lane / Lockway access junction which indicate that a 2.4m x 43m visibility splay can be achieved; which is in accordance with Table 7.1 of Manual for Streets (MfS) for a 30mph speed limit road and is entirely within the highway boundary.
- 8.2.2 In terms of sustainability, the site itself is within walking distance to a number key facilities within Drayton in addition to being within 400m of existing bus stops which are served by a regular express bus service providing connections to Oxford, Abingdon, Milton Park and Didcot.

8.3 Air Quality and Noise Issues and Mitigation

- 8.3.1 Due to the proximity of the site to the A34 the provision of residential development on some parts of the site will be constrained. The DEFRA Noise Policy Statement for England (NPSE) NPSE advises that the impact of noise should be assessed on the basis of adverse and significant adverse effect but does not provide any specific guidance on assessment methods or sound level limits. Moreover, the document states that it is not possible to have *"a single objective noise-based measures....that is applicable to all sources of noise in all situations"*. It further advises that the sound level at which an adverse effect occurs is *'likely to be different for different noise sources, for different receptors at different times'*.
- 8.3.2 Traffic noise generated by the A34 adjacent to the site will be dependent on a number of factors including the distance between the centre of the carriageway and the receptor, the gradient, percentage of HGVs, traffic speed of links, any existing screening between the receptor and the carriageway and the ground type. As such, it should be noted that the recommendations outlined in this report are to be used as initial guidelines and that further consideration can be given upon receipt of site layout plans. Based upon our initial analysis it will be necessary to consider the incorporation of acoustic barriers as part of the development of the sites in the form of such as acoustic fencing and bunding (as well as other 'barriers'

such as trees and vegetation and the development of houses themselves), particularly at the western boundaries of the sites where noise levels from the A34 are most prevalent. As development areas come forward in more detail, further noise assessment will need to be undertaken to ensure that proposed mitigation measures can achieve sufficient noise attenuation. Typical measures may include, but are not limited to: a suitable ventilation and glazing strategy; 'stand-off' distances from noise sources; sympathetic orientation of building facades and the design of acoustic bunding or fences.

- 8.3.3 The use of distance as a means of controlling noise can be effective but only if the size of a site allows for substantial standoff distances. As a general rule of thumb, in an urban environment any development site which is more than 100m from a major road is unlikely to need control measures for road traffic noise (Jaramillo, et al., 2014). In addition to distance, noise can also be controlled by physical barriers such as buildings or through the construction of a fence, bund or berm. Dense trees and vegetation can also be used, as is currently the case to the east of the A34, to reduce the perception of noise and to provide a further barrier from the noise associated with the A34.

- 8.3.4 It is of note that the Noise Assessment Report for the Miller Homes site to the north of Drayton (SA – 3176/RV.01) states *'The site is located approximately 400 metres from the A34, this does not have a significant noise impact and internal noise levels can be mitigated against'*. Based upon the output of the report, a design scheme for the windows and ventilation specifications have been made across the site to place the site in line with WHO 'Guidelines for Community Noise'.

- 8.3.5 Comparison has also been made to the recently consented Land North of Abingdon development for 950 dwellings. As shown on Figure 4, the site is adjacent to the A34 and is subject to similar noise constraints to the site in Drayton. The Noise Assessment report (10359/NM/01) recommended noise screening to be introduced to include a 5m barrier along the majority of the western boundary (adjacent to the A34) through either an earth bund or a noise fence, or a combination of the two. As shown on Figure 4, the development provided buffer planting for approximately 40m from the centre of the carriageway in addition to approximately 10m of acoustic mitigation area which can be used as a natural green space for residents. These measures in conjunction with double glazing ensure that the desired internal noise levels are achieved.

Figure 4 Land North of Abingdon (Noise Mitigation)



- 8.3.6 It is therefore considered that due to the proximity of the A34 to the site in Drayton, the provision of a 35-40m noise buffer in the form of a bund and vegetation would be required in addition to an acoustic mitigation area (natural green space) to mitigate the noise levels within the required limits. The provision of this buffer will also reduce the perception of noise by removing the visual impact of the A34 from within the development in addition to the existing residential areas to the west of Drayton. This buffer is incorporated within the initial indicative masterplan layout.
- 8.3.7 As aforementioned, Marcham is located within an AQMA which comprises an area along the A415, including part of Packhorse Lane and Frilford Road from east to west throughout the village. In addition to the strategic site allocations set out in Core Policy 4 of LPP2, development will be supported for 90 dwellings to the South-East of Marcham. It is considered that the majority of additional traffic associated with the proposed allocation at Marcham would travel towards Oxford, Abingdon-on-Thames and Science Vale (i.e. away from Marcham) and that new opportunities exist for improved public transport, cycling and walking connections in this area. Notably, as stated in paragraph 2.48 of VoWH Local Plan: Part 2 Publication Version (Oct 2017), *“the Council are satisfied that the relatively small development (90 dwellings) proposed to the east of Marcham will not adversely impact the AQMA”*.
- 8.3.8 It should be noted that the proposed development on land west of Steventon Road, Drayton is not within an AQMA. Further to this, despite a number of key local facilities within walking distance of the site, it has been demonstrated in Figure 1 that the majority of additional traffic associated with the site will also travel towards Oxford, Abingdon, Science Vale and wider South Oxfordshire (i.e. away from Drayton). Given the similar modest residential development (80 dwellings) in comparison with the slightly larger allocation at South-East of

Marcham (90 dwellings), it is therefore considered that the proposed development site does not give rise to any further air quality concerns.

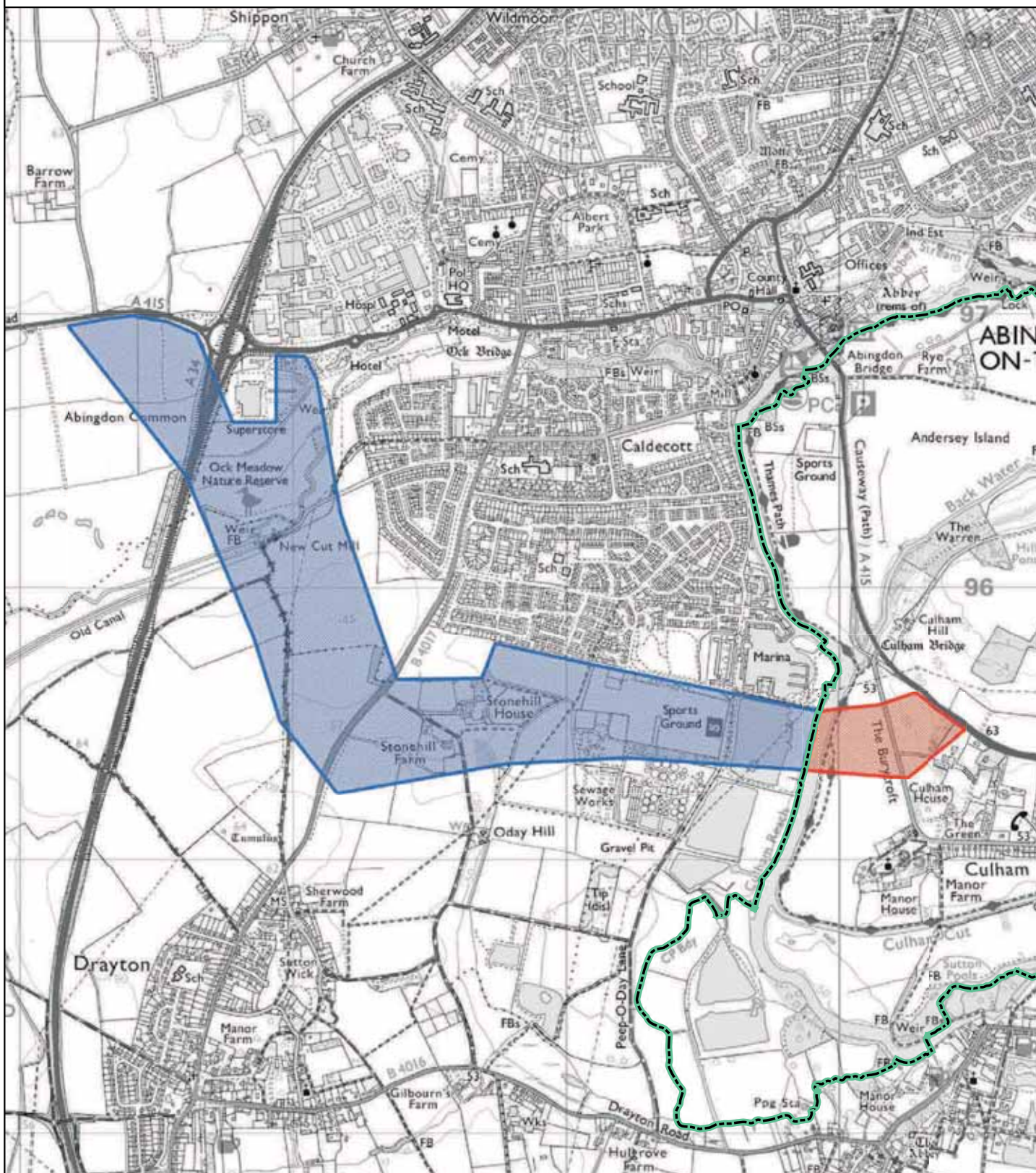
9. SUMMARY

- 9.1.1 The proposed development site is well positioned to promote sustainable trips to and from the site owing to its proximity to a number of bus stops within 400m of the site. These bus stops are served by the frequent X2 bus service which operates 19 hours per day, connecting the site to major employment and retail areas in addition to Oxford City Centre and Didcot Rail Station. Further to this the site is within walking distance to a number of local facilities and also has well established walking and cycling routes within the vicinity.
- 9.1.2 Subject to detailed assessments, the potential delivery of up to 80 dwellings should not have a severe impact on the local highway network and would be similar in terms of development quantum to other committed developments which have been promoted through the Drayton Neighbourhood Plan.
- 9.1.3 It should be noted that the existing local highway constraints surrounding the site have been recognised by the Local Authority; mitigation schemes and the safeguarding of land for the delivery of the Abingdon Bypass and improvements to Steventon Lights have been devised.
- 9.1.4 Existing committed developments within Drayton were not required to provide contributions towards these aforementioned schemes. However it is envisaged that the proposed site, together with other housing schemes coming forward within the Abingdon and Oxford fringe sub-area, will be subject to CIL. It is therefore considered that the proposed development could assist in providing a key contribution towards the necessary funding for the delivery of the South-Abingdon bypass and the improvements to Steventon Lights, both of which will help to alleviate congestion in the area.
- 9.1.5 The sustainability of the site, its access to a high frequency, direct bus service and the relatively low quantum of development should not prevent the site coming forward in terms of transport and highways.
- 9.1.6 In terms of noise, the consented development for 950 homes to the north of Abingdon is comparable to the site in terms of its proximity of the A34 to the site boundary. The Noise Assessment report which was submitted in conjunction with the planning application has been reviewed which indicates the requirement of buffer planting in addition to natural green space to form a suitable acoustic mitigation area. The provision of buffer planting and additional open space will reduce the total developable area to the east of the A34, however it will also provide further visual and audible sheltering from the A34 for existing and potential future residents to the west of Drayton.
- 9.1.7 There is no reason in terms of transport and highways as to why the site should not be promoted for a LP allocation at this stage. Indeed, considering the site's overall level access by a choice of modes of transport, including a high frequency express service to key settlements and employment areas, this site is located in a key position to encourage sustainability and a modal shift away from reliance on the private car.

APPENDIX A – LAND SAFEGUARDED FOR SOUTH ABINGDON BYPASS

- District Council Boundary
- Safeguarded Land
- Safeguarded in Vale of White Horse District

1:20,000



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