

VALE OF WHITE HORSE LOCAL PLAN 2031
PART 1 STRATEGIC SITES AND POLICIES
RESPONSE ON BEHALF OF MR AND MRS WILSON

CORE POLICY 12: SAFEGUARDING OF LAND FOR STRATEGIC HIGHWAY IMPROVEMENTS WITHIN THE ABINGDON-ON-THAMES AND OXFORD FRINGE SUB-AREA (PLUS PARAGRAPHS 5.34, 5.35 AND 5.36; AND APPENDIX E: MAP E15)

Introduction

On behalf Mrs. and Mrs. Wilson we object to the inclusion in the Local Plan of a proposal for the safeguarding of land south of Abingdon-on-Thames linking the A415 to the west and south east of the town including a new River Thames crossing ("the Abingdon Southern Bypass").

For the reasons given in this response we request that the safeguarding proposal for the Abingdon Southern Bypass, and all references to it, be deleted from the draft Local Plan.

Contrary to Law

Core Policy 12, its associated paragraphs and Map E15 in Appendix E purports to extend the safeguarding into SODC's administrative area. Indeed, as currently shown on map E15, the Abingdon Southern Bypass couldn't be completed without requiring land from within South Oxfordshire District. This is contrary to law and should be removed entirely from the draft Local Plan.

Section 13(1) of the Planning and Compulsory Purchase Act 2004 provides that the LPA must keep under review certain matters which may be expected to affect the development of their area (our emphasis) or the planning of its development. Section 17(3) states that the LPA's local development documents (of which the Local Plan would be one, once adopted) must set out the LPA's policies relating to the development and use of land in their area (again, our emphasis).

In view of the above, the purported designation of land in an area outside VWHDC's area – even if the LPA chooses to describe the designation as an "Area of Investigation (SODC)" – will produce a serious blighting effect whilst being wholly ineffective to regulate development.

In this regard, despite the draft Local Plan stating that the proposed bypass is only the subject of a safeguarding line and road building would not occur during the Plan period, blight is expected to occur in relation to land and property owners located along the full length of the safeguarding line – both in the Vale and in South Oxfordshire.

In the Vale, landowners are likely to be faced by years of uncertainty as to whether or not their land will be required for a bypass (the need for which and its delivery are yet to be confirmed). As a result, their land will have to remain largely as it is and any plans landowners might have for the long term use of their land (i.e. for uses other than

residential development) may be refused by the LPA on the grounds that it might prejudice the long term proposal for a bypass which might never come forward.

In addition, in the Vale and South Oxfordshire, property owners on the route are also likely to be blighted where the route passes close to or through their properties or grounds. In such cases, blight will relate to a diminution in value to such properties and landholdings as a result in the long term disruption caused by the proposed bypass.

It is essential for the LPA to note that VWHDC cannot make policy in respect of land outside of its area. Furthermore, it will not be responsible for determining planning applications in SODC's area.

A letter from solicitors Eversheds has been written in this regard (**see attached**).

No Long-Term Prospect for Implementation or Funding

Oxfordshire County Council (OCC) is currently consulting on its 4th Local Transport Plan (LTP4). Draft objectives have been published for public comment and these objectives will be the foundations upon which LTP4 will be developed. Of particular relevance to development plan making is objective 4 which states that OCC will:

"Influence the location of development to maximise the use and value of existing and planned strategic transport investment."

This approach aligns with the site selection process applied to the Local Plan as followed in the Evaluation of Transport Impacts Study to inform the Vale of White Horse District Council Local Plan 2031: Part 1 Strategic Sites and Policies Final Report Oxfordshire County Council November 2014 (hereafter referred to as the "ETI").

The ETI systematically assesses potential housing development areas throughout the district on the basis of existing and planned transport infrastructure interventions. This means that competing housing allocations can be compared on a level playing field in order to determine which locations would maximize the use and value of existing and planned transport investment.

Following this approach, the Local Plan and the ETI dismiss the south of Abingdon as an area for housing development preferring to focus housing on the Harwell / Didcot / Milton area which form main centres within the Science Vale. The Science Vale forms the southern element of the Oxfordshire Growth Arc which links the Science Vale through Oxford to Bicester.

We welcome this joined up approach to plan making in which land use policy seeks to locate development in areas in which there is planned investment in strategic transport infrastructure so that the use and value of this infrastructure is maximized. The benefits of this approach will also mean that developer investment in infrastructure which would otherwise need to be spent on transport infrastructure can be redirected to improve other types of infrastructure such as schools and health facilities etc which will benefit local communities.

Notwithstanding this, Policy CP12 would seem to be at odds with this approach. The plan making process which the LPA has followed systematically tests 27 sites grouped into five geographical clusters. The transport assessment of these is set out in the ETI. The process dismisses the area to the South of Abingdon as suitable for housing at an early stage in this process, inter alia, as there is no planned strategic transport infrastructure which could support major new development.

The ETI notes on page 24 that the authors were advised by the LPA that a southern bypass would be needed to support major development at this location.

"Scenario 4: South of Abingdon

By contrast, the Council minimised any proposed development in this area as it is already affected by traffic congestion. The proposed growth set out in the Housing Delivery Update accounted for less than 20% of the potential the sites in the area could accommodate (if constraints including transport were ignored). Individual development sites selected for inclusion in the consultation were also medium scale to reduce further impacts and the two most problematic sites were excluded altogether (North West Drayton and South Abingdon). The Council, working with Oxfordshire County Council, have consistently stated that development to the south of Abingdon could only take place if a new south Abingdon bypass is delivered for which there is currently no identified funding."

The Abingdon Southern bypass is described by OCC at paragraph 14.26 of their third Local Transport Plan (LTP3) – which is the currently adopted LTP for Oxfordshire – as a local scheme rather than strategic transport infrastructure stating:

"Both schemes (Lodge Hill and a new river crossing) are major infrastructure projects that would require significant financial investment. Given that the schemes are of local benefit, rather than strategic importance, they are unlikely to gain funding from central government."

In recognition, LTP3 establishes a number of different measures (paragraph 14.27) to deal with traffic in Abingdon. For example:

" encouraging use of low emission vehicles as technology advances come forward, with the aim to reduce average CO2 emissions in passenger vehicles and HGVs across Oxfordshire to 130 g/km by 2030;*

** improving child road safety by measures including targeted crossings, signage and traffic calming;*

** junction improvements where appropriate;*

** better signing, to encourage greater use of the perimeter road and clearer signage to local facilities;*

** investigating delivery/loading restrictions in the town centre for the peak hours; and*

** discouraging private car use by physical constraints such as traffic calming."*

Notwithstanding this established policy position, although the response from OCC to the draft Local Plan 2029 consultation (dated 9th May 2013) accepts the safeguarding of land for the southern bypass in principle (paragraph 21), at the same time OCC reinforces the argument/point that funding for the Abingdon Southern Bypass is unlikely. This is consistent with policy AB6 of LTP3 in which OCC state:

"Given that the schemes are of local benefit, rather than strategic importance, they are unlikely to gain funding from central government. Furthermore, the level of development planned for the town would not generate sufficient developer funding to cover the very substantial costs."

The likelihood or otherwise of securing developer funding for the bypass is given further below.

For the period up to 2031, OCC is very clear that there is no prospect of the Abingdon Southern Bypass coming forward because the bypass is not considered to be strategic infrastructure. Consequently, public funding will not be forthcoming and the area to the

south of Abingdon which would require the delivery of the Abingdon Southern Bypass has not been identified as suitable for housing and so developer funding is not expected to occur.

Looking beyond 2031, the Local Plan continues to provide no technical justification to demonstrate the purpose or need for the bypass and new Thames crossing. Reference is made in paragraph 5.34 of the Local Plan which suggests that the ETI demonstrates that development south of Abingdon would be inappropriate without the provision of a southern bypass.

"5.34. However, a potential longterm approach to alleviating traffic congestion to the south of Abingdon-on-Thames is the provision of a new southern bypass, including a second Thames crossing. Additional development to the south of Abingdon-on-Thames is inappropriate without the provision of this new bypass. [ATKINS (2014) Evaluation of Transport Impacts Assessment, available at: www.whitwhorsedc.gov.uk/evidence/]"

However as referenced above, the ETI simply notes that this is the LPA's stated position.

This approach directly contradicts the government guidance entitled Transport evidence bases in plan making, October 2014 which requires plan making which states:

"It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan."

Notwithstanding this, if it is assumed that there is some technical justification for the Abingdon Southern Bypass which has not been made clear in the evidence base, the Local Plan fails to give consideration, even in general terms, as to how such a bypass would overcome the following obstacles:

- Cutting across functional flood plain;
- Be raised above the 1 in and 100 year flood level;
- 5 river crossings including a new crossing of the river Thames; and
- A flooded gravel works now a reservoir.

These are major engineering issues to overcome which will significant expenditure. In addition, the Local Plan provides no evidence of how, and if, these obstacles can be overcome in a viable manner and environmental sensitive manner (see below).

Given that the road has no strategic purpose; that there is no development planned for the south of Abingdon; and there are different options available for alleviating congestion within Abingdon itself: there is no requirement for the bypass and therefore no justification for safeguarding land for the bypass.

- Likelihood of Securing Developer Funding for the Bypass

As can be deduced from the draft Local Plan, there is no funding in place from either Central or Local Government for the proposed bypass. Instead, the construction of the bypass would be reliant upon private sector funding through additional (residential) development to the south of Abingdon.

Although the Local Plan states that the proposed bypass wouldn't be required during the Plan period (i.e. up to 2031), we would question whether, in fact, the bypass could even be delivered with private sector funding in the longer term.

Previous cost estimates given in Topic Paper 6 (Transport and Accessibility) that the bypass could cost in the region of £20 million are considered to be very conservative. Instead, we

have estimated that the cost of the bypass to be more likely to be in the region of £35 million, which is the estimate given in the Abingdon Integrated Transport and Land Use Study Stage 3 Final Report (Preferred Strategy, May 2001). This is because of construction requirements for bridge crossings for the bypass (i.e. 5 crossings of rivers and other watercourses).

We consider for the following reasons that it is very unlikely that a bypass could be funded by development in and around Abingdon, even in the longer term (i.e. post 2031):

- (i) As described below, there are a significant number of environmental constraints relating to land to the south of Abingdon which, as a result, will limit the amount of new housing which would be required to fund the bypass from S106 / CIL contributions.
- (ii) As the Core Strategy Preferred Options January 2009 (now superseded) indicated, land to the south of Abingdon – if it was to be allocated in the next Local Plan – only has the potential to deliver approximately 2,070 new dwellings. Indeed, we consider that this could be a generous assumption of development capacity. Based on 2,070 dwellings and a S106/CIL contribution per dwelling of £2,000 for the bypass, we estimate that the total contribution towards the bypass from development to the East and West of Drayton Road could be in the region of £4.15 million. This, however, is less than 12% of the total cost of the bypass. Indeed, this contribution could be further eroded if the LPA also sought contributions for other S106/CIL related works, such as a contribution towards the restoration of the Wilts and Berks Canal south of Abingdon.
- (iii) Unlike in the case of the delivery of the south facing slips on the A34 at Lodge Hill which has received significant Government funding through the LEP, OCC's stated position is that the Abingdon Southern Bypass is unlikely to attract government funding because it is not strategic infrastructure. Consequently, it is also unlikely that any future development to the south of the town would receive 'subsidies' towards the cost of delivering the bypass.
- (iv) It is unlikely that development elsewhere in the District post 2031 could make up the shortfall in the total cost of the bypass. To meet the £35 million cost of the bypass would require the allocation of approximately 17,500 new dwellings post 2031. This assumes a 'roof tax' of £2,000 and each and every new development making the same level of contribution to the bypass. That said, even if that number of new dwellings were allocated we doubt that each development could afford to make such a contribution because it is more than likely that other major developments (for example in Didcot, Wantage, Grove and Faringdon) would require their own transport infrastructure, which could not therefore be counted towards a bypass for Abingdon. The other alternative would be to increase the 'roof tax' contribution, however, this could then lead to long term development proposals becoming unviable. In view of this, we call into question whether a £35 million bypass would be good value for money in terms of seeking to alleviate traffic congestion and whether, instead, a lower cost solution could be identified which is more effective.

In view of this, it is highly questionable as to whether or not the bypass could be funded and built for a very considerable period of time, even when viewed many years beyond the end of the current plan period to 2031.

Lack of Sustainability Appraisal / Failure to Assess Alternatives

The Sustainability Appraisal (SA) Reportⁱ for the Local Plan (October 2014) states in paragraph 10.8.1 that the delivery of strategic highway improvements was not considered

in relation to the appraisal of 'reasonable alternatives', which is a requirement of The Environmental Assessment of Plans and Programmes Regulations 2004 (known as the Strategic Environmental Assessment (SEA) Regulations).

The SA report states that there are a number of reasons for excluding certain issues from the assessment of alternatives including the lack of any reasonable options being proposed at this stage of plan development etc. Such reasons are however, not given within the report or its appendices.

Having reviewed the SA documents supporting earlier stages of plan making, including the Core Strategy Issues and Options (2007), Preferred Options Sustainability Appraisal (February 2009) and Core Strategy Sustainability Appraisal Scoping Report (February 2012), justification for lack of consideration of an alternative to the bypass is not evident. A trawl of the evidence base to support the draft Local Plan on the LPA's website sheds no further light on when, and on what basis, alternatives to the bypass were discounted in the process.

Whilst the 2014 SA Report contains an assessment of the reasonable alternatives put forward by VWHDC at this stage, it is not clear how the decision about the bypass's inclusion in the Local Plan instead of an alternative, has been reached.

We consider that:

- (i) The construction of an Abingdon Southern Bypass within the safeguarding land shown in Appendix E will, even if it is only constructed during the next Plan period, result in significant adverse affects to the local environment and to the amenity local residents.
- (ii) The proposed safeguarding line will also be a material consideration for at least the next 15 years which will affect planning decisions in and around the south of Abingdon, and not only in the Vale but also in South Oxfordshire.
- (iii) It is highly unlikely that a bypass of the length and design required to deliver the route identified in Appendix E is deliverable, even in the long-term (i.e. post 2031).

As a result, if the safeguarding line is to remain within the scope of Core Policy 12 and, therefore, afforded the same status as other Local Plan policies and also treated as a material consideration in the determination of planning applications, then it is essential that it is made the subject of Sustainability Appraisal (SA).

We, therefore, question the validity of the bypass's inclusion in the Local Plan given the lack of transparency in the document and supporting SA regarding the lack of an alternative.

We strongly urge the LPA to delete all references to the bypass from the Local Plan; or, if the LPA chooses not to accept this recommendation then, at the very least, consider and assess alternatives to the proposed safeguarding line before next draft version of the Local Plan is published for public consultation.

Loss of or Harm to Local Amenities (The Vale)

- Public Rights of Way and The Thames Path

The safeguarding line crosses a number of public rights of way and the Thames Path. The likely effect will be to disrupt otherwise rural walking routes. In this regard, the River Thames, to the south of Abingdon, is a key recreational and commercial resource. The Thames Path is used for informal recreation by numerous local stakeholders and visitors to

Abingdon from the wider area. The waterway is well used for rowing (for example, by Abingdon Rowing Club and Abingdon School) and by recreational boat users. It is also well used by anglers.

- The River Thames

The proposal would have a significant impact on the setting of the River Thames during both the construction of the bypass and associated bridge and in the long term as a result of the operation of the bypass. Key impacts would include landscape and visual impacts, and noise and dust generation. There is the potential for impacts on water quality particularly during the construction phase but also during the long-term operational phase as a result of the discharge of contaminated run-off. These impacts would have a significant adverse effect on the use of the Thames Path and the waterway by recreational users.

- Air Quality

Indeed, the Core Strategy Preferred Options stated at Appendix 2a that “development [on land east and west of Drayton Road] could worsen air quality in central Abingdon which is designated an Air Quality Management Area.

- Effect on Existing Sport, Recreation and Leisure Facilities

The safeguarding line of the bypass also passes through the Southern Town Park. Without an assessment of the environmental effects of the proposed bypass (and its alternatives), the Local Plan cannot conclude whether or not the Policy will result in harmful noise disturbance to people using the Park.

The proposed route of the bypass also passes through land used by the Abingdon Rugby Club. Depending on the route finally chosen (if Core Policy 12 remains in the Local Plan), the Rugby Club could find itself in a position whereby it cannot use all the pitches it currently uses; or be able to plan for its long term future on its current site. Depending on the degree of disturbance caused by routing a bypass in this particular location, the Club might face difficulties in staying long-term in its present location. In addition, it is understood that the Rugby Club is located upon reclaimed ground which, if built upon by a road could add to the expense of its construction.

Effect on the Built Environment (The Vale)

The safeguarded land runs straight through a Scheduled Ancient Monument (Sutton Wick settlement site). This is a national, statutory heritage designation and the Local Plan contains no justification for the adverse effects that would result. Topic Paper 8 supporting the draft Local Plan acknowledges the rich cultural heritage of the Vale and reiterates the importance of testing draft policies through SA.

The potential effects of the bypass safeguarding on the Scheduled Monument and cultural heritage in general does not appear to have been assessed despite protecting cultural heritage being a sustainability objective within the SA (see Table 8.1 of the Sustainability Appraisal (SA) Reportii for the Local Plan (October 2014).

Consideration would also need to be given as to whether or not the route of the bypass, for example in relation to land to the south of the Tesco superstore contains areas of archaeological significance.

The building of a bypass in this location would also adversely affect views of St. Helens Church in Abingdon.

Effect on the Built Environment (South Oxfordshire)

The safeguarding line of the bypass passes directly next to the Conservation Area at Culham which, if the bypass was built here, would result in a significant adverse visual impact on the existing village scene, which includes the village church, the village green and the houses which are located around the green.

Indeed, a number of buildings are located very close to the safeguarded land, including the Waggon and Horses Public House. In addition, the safeguarding line also passes immediately next to the grounds of listed buildings in Culham (i.e. Culham House) and the grounds of other buildings located within the Culham Conservation Area.

Landscape and Visual Effects

A Landscape and Visual Statement has also been prepared by Barton Willmore (**see attached**).

This statement was prepared in response to the safeguarding line identified in the Local Plan to 2029 and provides a preliminary strategic overview of the proposed Abingdon Southern Bypass route and its potential landscape and visual effects.

That Statement – although relating to the previous depiction of the safeguarding route – is still of relevance to the revised safeguarding line in that it concludes that development on the proposed route could adversely affect particular sensitive receptors.

The proposed crossing of the River Thames and its effect on an enclosed parkland landscape to the north of Culham Conservation Area could result in significant adverse effects on the character of the area.

In addition, the mature woodland and historic small scale field pattern surrounding Stonehill is also sensitive to the proposed bypass. Any development within these more sensitive areas could undermine and adversely affect their existing characteristics including the setting of listed buildings and Culham Conservation Area.

The Statement recommends that a more detailed assessment of the landscape and visual effects is required, including the identification of alternative route options before land is safeguarded. Alternative options could include realignment of the proposed route further away from Culham Conservation Area and Stonehill House.

Effect on the Natural Environment

- Ecological Effects

The safeguarding line cuts through the Ock Meadows Nature Reserve. Indeed, the Core Strategy Preferred Options stated at Appendix 2a that “the ecology and the rural character of the Ock Valley Corridor could be harmed by the construction of a road”.

- Best and Most Versatile Agricultural Land

As indicated in the Core Strategy Preferred Options at Appendix 2a (i.e. in relation to the potential for development on land east of Drayton Road), development in this location could result in the loss of Grade 2 agricultural land. Grade 2 land is defined as the “best and most versatile” (BMV). Minimising development on high quality agricultural land is key to sustainability objective 11 Increasing resilience to climate change and flooding (Table 8.1 of the Sustainability Appraisal (SA) Reportⁱⁱⁱ for the Local Plan (October 2014). It is unclear as to how the loss of such land for a bypass has been assessed in the plan making process.

- Minerals Safeguarding

The safeguarding route also passes immediately adjacent to an area identified in the adopted Minerals and Waste Local Plan where the principle of future sand and gravel working is acceptable. As a result, any proposal for a bypass would need to ensure that any future mineral working is not prejudiced and that suitable vehicular access to and from the mineral working area is maintained.

Flood Risk

The safeguarded route of the bypass would result in the loss of land that is currently used for flood management to the east of the River Thames and to the south of Abingdon. The loss of this land could result in an increase in flood risk to properties both within Abingdon and downstream at the villages of Culham and Sutton Courtenay.

In particular, the proposals would affect land to the west of the village of Culham which is designated as follows within the Strategic Flood Assessment (March 2009):

- Flood Zone 2;
- Flood Zone 3.

Cutting through functional flood plain, to avoid exacerbated flood risk the road would need to be raised above 1 in 100 year flood level plus an allowance for climate change. Embankments and structures provided to achieve this would need to be designed to allow the conveyance of flood waters across the flood plain to prevent the road acting as a dam and increasing the risk of flooding to existing properties to the south of Abingdon. The EA advise that bridge abutments should be kept outside the 1 in 100 year plus climate change extent.

The Sustainability Appraisal (SA) Report^{iv} for the Local Plan (October 2014) shows in paragraph 6.1.38 that Abingdon is at risk of flooding, likely to be exacerbated by climate change and Figure 6.7 confirms that the safeguarded land for the bypass lies within flood zones 2 and 3.

A sustainability objective is to increase resilience to climate change and flooding and in particular to minimize and reduce flood risk to people and property (Table 8.1).

It is unclear as to whether the flood risk implications of a bypass have been evaluated. In order to maintain safe passage during times of flood it is anticipated that a bypass would need to be elevated considerably, which would increase its adverse effects on landscape and views and on the setting of nearby heritage assets such as listed buildings.

Other Consequences of Promoting an Inappropriate Bypass Proposal

There has been no consideration of the potential effect that a bypass could have – compared with non-bypass options – on encouraging motorists to use this route who might otherwise use other roads for their existing journeys.

For example, the future bypass could potentially increase traffic flow along the A415 increasing the environmental impact on the village of Culham; and impact on traffic lights at Clifton Hampden (i.e. effectively relocating a traffic problem from the Vale to South Oxfordshire). These are further shortcomings of the draft Local Plan in not assessing the proposed bypass and its likely effects, regardless of whether the bypass is intended to be built before or after 2031.

In addition, as stated above, to be able to fund a bypass, the LPA would have to allocate in the region of 17,500 dwellings. Firstly, we seriously doubt that there is land to the south

of Abingdon to accommodate such development within acceptable environmental limits. Secondly, if the LPA was to pursue such a scale of enabling development at Abingdon then it would need to look elsewhere around the town and that would require the release of a significant amount of land from the Green Belt, possibly over 500 hectares.

Previous Consultation Response submitted by South Oxfordshire District Council

Even though the LPA is reliant on the assistance of SODC for delivery of the Abingdon Southern Bypass – because an essential section of the route is located within South Oxfordshire and, therefore, outside the jurisdiction of VWHDC – it remains unclear from viewing the draft Local Plan and supporting documentation as to what, if anything, has been discussed or decided with SODC in relation to the safeguarding proposal.

In this regard, we note the consultation response submitted by SODC to the Local Plan 2029 (ID: 729030) which makes the following points:

"We [South Oxfordshire District Council] note, however, that the Plan shows part of the safeguarded route for the proposed southern bypass to lie in South Oxfordshire."

"The Vale of White Horse (VOWH) local plan cannot safeguard land in another district."

"The VOWH local plan has no proposals for the development of land to the south of Abingdon in the plan period and we [South Oxfordshire District Council] understand that without this the proposed southern bypass will not be needed."

"It is only reasonable to safeguard land if there is a realistic prospect of the proposal coming forward. The proposed policy is neither justified nor effective."

"This council requests that the plan at Appendix E be amended so that it does not show safeguarding of land in South Oxfordshire."

"This council requests that, if the VOWH DC wishes to progress the proposal for a road south of Abingdon, that this council, the county council and other relevant parties, should be involved in discussions about the acceptability of the principle, the consideration of different route option, and the scope of any mitigation required." (our emphasis)

These objections are fully supported by Mr. and Mrs. Wilson and accord with the various points we have made in this current response to the Local Plan 2031.

Soundness

Core Policy 12 is unsound in relation to the identification of a proposal for the safeguarding of land for an Abingdon Southern Bypass for the following reasons:

- (i) The proposed safeguarding of land for an Abingdon Southern Bypass is not the result of an objectively assessed infrastructure requirement.
- (ii) The LPA has not justified the proposal for an Abingdon Southern Bypass as being the most appropriate strategy for the solution of perceived traffic congestion on the south side of Abingdon. In addition, no consideration has been given (or reference made) to the assessment of alternatives to a Southern Bypass to alleviate perceived traffic congestion problems.
- (iii) The Policy is not effective because it is not deliverable during the Local Plan period; and it has not been demonstrated that it is deliverable or the best option for construction post 2031. This is because:

- (a) The proposed bypass is only the subject of a vague safeguarding corridor which hasn't been assessed against reasonable alternatives, which could be more effective in terms of alleviating traffic congestion and less expensive and damaging to the local environment and amenities of residents.
- (b) The proposed bypass relies on land coming forward to complete the bypass on land which is outside of the LPA's jurisdiction. It is also unclear as to whether there has been any meaningful joint working between the LPA and South Oxfordshire District Council (SODC) to establish the requirement for a bypass or to identify an appropriate safeguarding line (if a bypass is agreed to be the preferred option).
- (c) The proposed bypass is highly likely to be dependent on funding from development projects (post 2031). Its delivery is, therefore, very much in doubt because of the very limited availability of developable land opportunities in and around Abingdon of the scale required to support such a large-scale and expensive road building project.
- (iv) The LPA has not demonstrated how an Abingdon Southern Bypass will deliver sustainable development in the long term (i.e. post 2031). Due to the considerable presence of environmental constraints to the south of Abingdon, a bypass in this location will not release and sustain a significant amount of long term residential development opportunities which could be judged to be sustainable or capable of meeting the long term development requirements of Abingdon and the surrounding area.

What change would resolve your objection? (If objecting)

It is unclear as to why such a large allocation of land has been made with little regard for its potential effects, which could be as significant as effects arising from the allocation of land for residential and employment uses. The potential effects of highways infrastructure to serve such allocations and allow growth should be a consideration. It is concerning that no transparent justification has been given for excluding the evaluation of alternatives to the bypass from the Local Plan and SA. For a proposal with potentially significant effects on the environment, full SA should be undertaken of the proposal and reasonable alternatives.

In order to meet our objection, all references to an Abingdon Southern Bypass should be deleted from Core Policy 12 and the Local Plan to 2031, including the supporting paragraphs and at Appendix E.

However, if the LPA chooses not to accept this recommendation then, at the very least, alternatives to the proposed safeguarding line should be considered and assessed before the Local Plan is ready for submission to the Secretary of State.

ⁱ URS for Vale of White Horse District Council (October 2014) Sustainability Appraisal of the Vale of White Horse District Local Plan 2031 Part One

ⁱⁱ URS for Vale of White Horse District Council (October 2014) Sustainability Appraisal of the Vale of White Horse District Local Plan 2031 Part One

ⁱⁱⁱ URS for Vale of White Horse District Council (October 2014) Sustainability Appraisal of the Vale of White Horse District Local Plan 2031 Part One

^{iv} URS for Vale of White Horse District Council (October 2014) Sustainability Appraisal of the Vale of White Horse District Local Plan 2031 Part One