



**Vale of White Horse Local Plan Part One:
Strategic Sites and Policies**
Publication Stage Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse Local Plan

Response form for the Vale of White Horse strategic planning policy document, the Local Plan Part one. Please return to Planning Policy, Vale of White Horse District Council, Benson Lane, Crowmarsh, Wallingford, OX10 8ED or email planning.policy@whitehorsedc.gov.uk no later than Friday 19 December 2014 by 4.30 pm precisely.

This form has two parts –

Part A – Personal Details

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	Mr	
First Name	Steven	
Last Name	Moss	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1	Millside	
Line 2	Mill Orchard	
Line 3	East Hanney	
Line 4	Oxfordshire	
Post Code	OX12 0JH	
Telephone Number		
E-mail Address (where relevant)		

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 Proposals Map

4. Do you consider the Local Plan is :

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (Positively Prepared, Effective and Justified)	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

Please mark as appropriate.

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy Context

The NPPF makes it clear that any developments that generate significant amounts of movement should be supported by a Transport Assessment and a Travel Plan. In addition, paragraph 32 states that development should be prevented or refused on transport grounds where *the residual cumulative impacts of development are severe*.

In para 2.13 of the Draft Local Plan it states that *"It is important that growth across the district effectively addresses any highway constraints and helps to deliver a shift towards more sustainable modes of travel."*

Proposed Core Policy 17 (Delivery of Strategic Highway Improvements within the South-East Vale Sub-Area) states that *"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"*

Proposed Core Policy 33 (Promoting Sustainable Transport and Accessibility) states that the Council will work (with others) to *"actively seek to ensure that the impacts of new development on the strategic and local road network are minimized..."*

The Impact on East Hanney

Topic Paper 6 (Transport and Accessibility), which supports the Draft Local Plan, shows, at Table 3.2,

the traffic flows (percentage capacity at 2031) along the A338 corridor within the Vale of White Horse at Stage 1 (South East Plan growth with some mitigation) and Stage 5b (Local Plan 2031 growth with final mitigation package). This confirms that the A338 (South) at East Hanney is at 97% of capacity during Stage 1 and 93% during Stage 5b during the PM peak hour.

Paragraph 3.10 states that "Later stages of the Evaluation of Transport Impacts (ETI) Study (for example Stage 5) tested the new housing target for the Vale (20,560 homes derived from the Oxfordshire Strategic Housing Market Assessment). With this increased housing target it was found that additional highway mitigation was required . . ." A number of schemes were identified through the ETI process including:

- Improvements to traffic signals at A415/ A338 Junction
- Corridor Improvements to the A420, A338 and A417

With reference to 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, OCC, November 2014, the 'Stage 1' results show that the A338 is forecast to be operating below operational capacity in the morning peak. In the evening peak the A338 is forecast to be operating below operational capacity except in the southbound direction between East Hanney and Grove, which is forecast to be operating above operational capacity.

The A338 appears to be operating at or above operational capacity for every scenario tested. However, in the summary of key highway issues table at the end of each scenario test, the A338 corridor (other than in respect of the A415 junction with the A338 at Frilford) is not mentioned.

Section 7.4 discusses the 'Highway Mitigation Scenario Definition – ETI Stage 5A, B & C'. The commentary at 7.4.2 states that "The medium scale schemes which aim to address traffic problems on the A417, A420, A415 and A4130 include...". It is notable that there is no mention of the A338.

In addition to the mitigation measures above, Oxfordshire County Council will progress so-called Corridor studies along the A420, A338 and A417 (as mentioned above). Such studies typically have the following objectives:

- Improve capacity by reducing non-motorised and motorised user conflicts;
- Improve public transport frequency and reliability along the corridors;
- Thus enable more people to travel;
- Address the competing requirements of road users and the adjacent communities; and thus improve safety at accident hot-spots;

and are, therefore, unlikely to yield solutions to the highways capacity issues associated with the A338 at East Hanney.

Apart from improvements to the traffic signals at the A415/A338 junctions at Frilford, there do not appear to be any further highway capacity schemes being considered along the A338 corridor. Even with all of the highway mitigation schemes, the A338 (at East Hanney) is operating at, or above operational capacity in the evening peak hour. Furthermore, no land is safeguarded for highway improvements in the vicinity of East Hanney to provide for improvements in the future.

As there are no mitigation schemes associated with the A338 around East Hanney, the impact of the developments proposed in the Draft Local Plan could potentially be severe, and hence is not acceptable in accordance with NPPF.

For the same reason, the developments proposed in the Draft Local Plan do not comply with proposed Core Policy 17, which requires impacts to be mitigated, and inhibits compliance with Core Policy 33 which seeks, inter alia, to minimize the impacts of new development.

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Commitments should be made (jointly with the County Council and also reflected in the next Local Transport Plan) to significant and specific measures which mitigate the impact of the overall level of proposed development in the Vale on East Hanney.

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

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

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

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

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

11 Dec 2014

