

Vale of White Horse Draft Local Plan 2031 (“the Plan”)

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Matter 7

Does the Plan make adequate and soundly-based provision for the infrastructure and services necessary to support new development?

- 1.01 Para 2.13 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.” A sound Plan must include effective policies and not pious words. There is no evidence in the IDP that substantial contributions to public transport will be required from new developments and these are not currently included in the CIL schedule.
- 1.02 It would not be reasonable to seek contributions from new development to pump-prime or support public transport services where the private car traffic generated by the development would actually be making the public transport services worse. Such contributions would only be reasonable where effective conditions and obligations are put in place to actually reduce car traffic and enable the public transport to operate to enhanced timetables.
- 1.03 As of early 2016 the subsidised bus routes across the VWH district will lose their funding from the County Council. This will include places where all their buses are subsidised and others where early and late buses and those running at weekends are currently funded. Although the bus companies might choose to continue to run some of these services without subsidy, and it might be a legitimate use of planning obligations to support services that would otherwise be withdrawn, the impact of this withdrawal of funding is a major factor in the consideration of the location of new development.
- 1.04 It is inaccurate and misleading to have the objective of, “Maintaining the very good bus services, particularly between the main settlements”. This could not have been written with reliable information about even the current situation on the Premium Route between Oxford – Abingdon – Didcot. Thames Travel would confirm that this is currently proving almost

impossible to operate to any reasonable standard, partly but not only due to congestion in Abingdon and Oxford. This is a crucial route and fundamental to both the objective of the Plan to reduce car dependency and in preventing new development making the area even less sustainable for existing residents and businesses. The statement would have more truth if the area being considered excluded the area between Abingdon and Didcot but actually the precarious nature of the A34 is a factor that also affects routes serving Abingdon.

- 1.05 Fig 5.6c shows a service of 15 mins between Milton Park and Abingdon. This is twice the level of the existing service (and the public subsidy for weekend and evening services is being withdrawn) which already struggles to maintain a 30min service. Increasing the frequency implies substantial funding but is unlikely to be achieved with the existing congestion which is occurring even before the projected growth in houses and jobs. A sound Plan would set out the measures that would be necessary to achieve the remarkable modal shift implied by this objective.
- 1.06 A sound plan would require, developer funded car clubs for new and existing residents, rigorously enforced travel plans for all new commercial developments, reduced residential and commercial parking provision combined with work place parking levies.
- 1.07 Carbon emissions from transport have increased importance following the announcement that the UK is not on target to meet its legal obligations on carbon reductions.¹ Given the profound difficulties in reducing carbon emissions from agriculture, manufactures, air travel and the military, the focus needs to be on heat production for buildings (ie space and water heating) and transport.
- 1.08 “Ensuring that employment and housing growth is located to reduce the need to travel by car and encourage walking and cycling for short journeys”. A development plan should comprise firm policies and not warm words. There are no policies in the current Plan that would suggest any modal shift would take place. This is particularly so given the significant number of allocations in car dependent rural areas without a firm commitment/requirement to substantially improve their the facilities and self-containment. Payments to bus services would be unjustified if congestion is planned to increase.

¹ Speech by Amber Rudd MP to HoC on 18 November 2015 and

- 1.09 “Supporting improvements to public transport, cycling and walking to provide attractive alternatives to travelling by car and to help minimise traffic congestion, particularly between the district’s main employment and service centres.” This again implicates the Thames Travel services to the south of Abingdon that cannot operate efficiently or offer an alternative to the car because of **existing** levels of congestion.
- 1.10 The provision of new road infrastructure will encourage even more car use and reduce the incentives to use buses and bicycles. This is a fundamental inconsistency between the Plan and the Climate Change Act and associated carbon reduction budgets. People living in rural areas without a car are dependent on bus services which are being made more inefficient and unsustainable due to the level of car dependency, congestion, and the removal of subsidies due to public spending cuts.
- 1.11 “SO 8: Reduce the need to travel and promote sustainable modes of Transport.” There are no effective policies in the Plan that show how this objective is to be achieved. The CIL and grants are being invested in road schemes but not to improve public transport. No reference is being made to developer funded ULEV car clubs through s106 obligations placed on developments that, unmitigated, will otherwise make congestion and GHG emissions even worse. Without intervention by the LPA in the granting of planning permissions with effective traffic reduction measures carbon emissions from transport will simply get worse. The Government is relying on the 2011 Carbon Plan that requires the transport sector to be heading for zero carbon by 2040 that will in practice require substantial reductions at local level that will need to be achieved through sound local plans.
- 1.12 “4.42. Any new development increases the use of, or demand for, existing services and facilities. Where new homes or jobs are developed and there is insufficient capacity to meet additional demand it is essential that new facilities and infrastructure are provided to meet the demand created.” That should be case, but the Plan would need to require village services and employment opportunities to be substantially improved to make rural locations sustainable. (incidentally, Drayton School needs to be added to the list of facilities to be financed through CIL as the small proportion made available to the Parish Council would be insufficient.)

- 1.13 In considering the 'Settlement hierarchy:' the Plan directs, "...growth to towns and larger villages...[which]... will help to ensure the delivery of sustainable development because: these settlements provide the best range of services and facilities and new development will help to support and enhance them - locating new homes in the communities with the best services and facilities will enable the residents in the new homes to access them by walking, cycling and public transport, so reducing the need to travel by car - it will enable more affordable homes to be built where there is most need, and...". It is a choice being made by the LPA to support significant growth in larger villages. However, there should be no pretence and, importantly for the test of soundness, there is no evidence that this strategy will be sustainable in terms of reducing the very high level of car dependency in these areas. Traffic reduction attributable to self-containment only becomes noticeable in settlements over 25,000 people. This strategy would only be 'sustainable' if there were also some very prescriptive policies to massively enhance facilities and workplaces. Alternatively developer funded low carbon car clubs together with substantial contributions to public transport are absolutely necessary for development proposals to start to benefit from the presumption in favour of sustainable development and become grounded in a sound local plan.
- 1.14 Under the Spatial Strategy it seems that most of the jobs are expected to be at Harwell and Milton Park. In terms of low carbon travel this would seem to overlook the potential of Culham Station (just outside the District) which could service significant areas of brownfield land adjacent to the JET project and the Culham science park? It would also be a simple matter to measure and monitor the use of commuting by bus and train. Such a facility could act a park and ride to Oxford/Birmingham and Reading and London for residents in the Abingdon area.
- 1.15 It might seem to be insignificant in the context of the projections for jobs in Science Vale, but the SHMA predicted (objectively assessed?) a significant need for housing associated with a growth in agricultural employment. If accepted as part of the evidence base for this Plan then there should be supportive policies in the Plan. A sound Plan would make it clear that these new agricultural dwellings should be located in sustainable locations (ie on the edge of villages and not in the open countryside), probably reserved as part of

residential allocations in villages. This would be consistent with the encouragement given to local food production in the draft Design Guide² and part of a strategy to reduce carbon emissions from agriculture.

- 1.16 “4.47. The requirement to provide new or enhanced infrastructure must not be so onerous as to render development unviable, taking into account other policy requirements such as affordable housing provision. For this reason an independent viability study has been carried out to inform this strategy and the draft IDP45”. And Core Policy 7 states that, “...If infrastructure requirements could render the development unviable, proposals for major development should be supported by an independent viability assessment on terms agreed by the relevant parties including the Council and County Council, and funded by the developer. This will involve an open book approach.” The Plan should note that viability is important but actually the only presumption in the NPPF is in favour of sustainable development. This places an onus on the Plan to deal with sustainability with at least and probably greater thoroughness than that given to viability (see the report commissioned from HDH). The Government has confirmed that the issue of viability should be addressed through the price of development land and not through reducing the provision of infrastructure and affordable housing in accordance with development plan policies.³
- 1.17 The A34 itself is notoriously liable to congestion (not only at peak hour) that could render the ambitious growth projections (the residential growth in the SHMA is predicated on the predicted job growth) unlikely to be achieved. There are substantial new developments planned at Begbroke (jobs), North Oxford (houses, jobs and mainline station), Botley (houses and retail/jobs), North Abingdon (houses), Milton and Harwell (jobs and houses) which will be largely dependent on a functioning A34. The LEP, SHMA and now this draft Plan all lack credibility by failing to address and quantify the problems with the A34 (proposed junction improvements would encourage its use by car) and the uncertainty this creates for the growth of both jobs and housing in this area.

² A policy on local food relating to the use of land and buildings should be in the Local Plan and not a design guide

³ <https://portaldirector.wordpress.com/2015/12/03/government-confirms-value-of-land-should-reflect-planning-requirements/>

- 1.18 It should be an important part of the Plan to identify the measures that could mitigate this strategic challenge. A 55mph speed limit would reduce the differential speeds (HGVs at 50mph and cars up to 80mph)⁴ and the frequency and severity of RTAs which are a major cause of congestion. Lower speeds would improve the smooth running and reduce congestion. Noise from engines and tyres would be reduced and air quality would be increased; all important factors given the proximity of some of the strategic allocations to the trunk road. Finally, both the lower speeds and less congestion would reduce CO2 emissions in the direction of carbon reduction budgets. The 50mph limits placed on the trunk road network around Oxford (including the A34) have all been negotiated and agreed by Highways Agency (now Highways England) and with the relevant district/county councils.

2. Core Policies

- 2.01 **CP7** can be supported while it continues to make clear that development proposals that do not fund the necessary infrastructure will be refused as being unsustainable development. The definition of “infrastructure’ is being extended to include housing⁵ and this is entirely appropriate given the contribution that affordable housing makes to an area by providing accommodation for key workers. Reduction in affordable housing is as harmful to the operation of industry as is the congested highway network. This is why CP7 should be amended to include affordable housing.
- 2.02 **CP12** lists a number of road ‘improvements’⁶ that illustrate the contradictory nature of the approach to infrastructure provision in the draft Plan. There is a policy for limiting access onto the A34 by local traffic but this is the specific purpose of the works proposed at the Lodge Hill junction. The proposal to seek to safeguard a road line to the south of Abingdon is to increase the capacity of the road network to facilitate car use and dependency when the draft Plan expects this to be ‘minimised’. In fact the southern bypass cannot be paid for through development as the land in the vicinity is scheduled ancient monument or currently being developed without any

⁴ The difference is nearly 40% when a 25% differential is regarded as dangerous

⁵ Housing and Planning Bill 2015

⁶ In about 1970 an Inspector acknowledged at a public inquiry into the widening of the A1 that ‘improvement’ must be understood as “improvement, for better or for worse”.

financial contributions. More extensive development might raise some money but insufficient to pay for a long length of road and river crossing Safeguarding this road line will simply serve to statutorily blight this area (including Stonehill House) to no purpose.

- 2.03 **CP17** lists a number of road ‘improvements’ which again illustrate the contradictory approach to infrastructure provision in the District. The draft Plan lacks any policies with any reasonable prospect of reducing car use without which increased junction capacity and road space will be filled by the car traffic from the growth of housing and businesses. Bus services cannot be improved to mitigate the impact of new developments (so 106 contributions cannot be properly justified) and the area will become more congested and unsustainable, an illustration that the Plan is unsound (see s39(2) of the 2004 Act).
- 2.04 **CP19** referring to the re-opening of Grove Railway Station should be supported, but this has been an aspiration for long enough for the policy to have little credibility without firm evidence of the progress that has been made and the steps which now have to be taken.
- 2.05 **CP33** seeks to minimise traffic impacts from new development. The LPA is currently supporting residential developments with over 2 parking spaces per dwelling. This is in the context of agreed travel plans. Unless the Plan signals a change of approach (and there are no policies being proposed that would significantly impact on car ownership and use) the only demand management measure in operation would be the congestion caused by the new development. This would make the area less sustainable for both the new and existing residents and businesses. The Core Policy should specify the measures that will be used to significantly reduce car dependency and use – reflected in substantially reduced parking provision, and justifying contributions to bus services.
- 2.06 **CP34** should say, “...work with the Highways England to reduce the speed limit on the A34 to 50mph...”, which is the quickest, cheapest and probably only effective way to secure the objectives of reducing congestion, increasing air quality and reducing noise (not a benefit currently mentioned in the policy?).
- 2.07 The dispersed nature of development in the District and the strategic allocations means that the well meaning references

to cycling and walking will make little difference to modal share. Again, it is unrealistic to expect traffic conditions to improve unless all new development is used to reduce existing levels of car dependency and use at the same time as housing and jobs increase by about 40%. **CP35** should say that, "...demonstrating how there would be a net reduction in car use (to be reflected in parking provision) will be a requirement of all travel plans."

3. Summary

- 3.01 The draft Plan is unsound as it does not include the evidence of the levels of road congestion within the District (including the A34) or demonstrate how this will be reduced at the same time as housing and jobs grow. This is a necessary precursor to the improvements to the bus services to which the Plan is committed.
- 3.02 The Plan is also unsound given the lack of any evidence that the carbon emissions from transport will be reduced by about 60% by 2031 – while houses and jobs grow by about 40%. This is necessary in the context of the 2011 Carbon Plan, the 4th (and 5th) Carbon Budgets (ie the Climate Change Act 2008 – see NPPF para 94), s39(2) of the 2004 PCP Act and the position recently described by the Secretary of State for Energy and Climate Change explaining why carbon reductions will be needed from the transport sector to meet legally binding carbon reduction targets.⁷
- 3.03 New development must be made to pay for all 'necessary infrastructure' (see recent reminder from CLG to Islington LBC) which could affect the viability of some sites, including those where too much has been paid for the land. In these circumstances the emphasis must be placed on limiting expenditure on and making much more efficient use of existing infrastructure, including housing, roads and public transport. This should mean some relatively severe measures to limit car use. A strategy that relies on dispersal of housing and jobs is unsound if the result will cause the area to be less sustainable for existing and new development.

⁷ COP21 identified the need to reduce carbon emissions still further to aim for a 1.5 degree rise in global temperatures