

OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO VALE OF WHITE HORSE LOCAL PLAN PART 2 PROPOSED SUBMISSION DOCUMENT

Comments close 22nd November 2017

Covering Comments

Oxfordshire County Council largely supports the Vale of White Horse Local Plan Part 2 (LPP2) Proposed Submission document. LPP2 is required by Core Policy 2 of the Local Plan Part 1 (LPP1) in relation to Oxford's unmet need, and also includes development management policies and other matters.

The County's key concerns relate to certainty around provision of infrastructure. A number of matters that we raised in respect of the Preferred Options document in May 2017 have been resolved through revisions of text and allocations. However, we await government decisions on funding and decisions on future changes to the Community Infrastructure Levy (CIL).

The way forward is further joint working. Progress has been made this year through the Oxfordshire Growth Board in relation to the publication of an Oxfordshire Infrastructure Strategy (OxIS) and matters such as a decision in principle to prepare an Oxfordshire Joint Spatial Plan. The National Infrastructure Commission's report and associated papers on the 'Cambridge-Milton Keynes-Oxford Arc' published 17 November 2017 further establish the need for statutory spatial plans in the near future, preceded by a spatial vision. The Government's budget will be announced on 22 November 2017.

We recognise that the Inspector examining LPP2 will be concerned to ensure that the Plan allocates sites which can viably provide for necessary infrastructure. At this stage we are not able to give reassurance that the necessary infrastructure has been identified and costed. We consider that the Vale of White Horse Infrastructure Delivery Plan LPP2 Update October 2017, provided as evidence the Proposed Submission LPP2 document, appears to underestimate the infrastructure needs of the sites proposed for allocation. We will work with the District Council to address these issues.

The County Council wishes to participate at the oral examination of the Plan in order to explain its comments and help the Inspector address any queries in respect of issues the County has responsibility for.

Local Plan Topics

INFRASTRUCTURE DELIVERY

1. The County Council is concerned about whether necessary infrastructure will be able to be funded and delivered. The County Council has responsibilities, for example for transport and education, yet is dependent on funding for example from central government grants and through S106 agreements in respect of development.
2. The Vale of White Horse District Council has recently implemented a Community Infrastructure Levy (CIL). This offers the possibility of funding some infrastructure in future using funds gained through the levy. Where such CIL funds are gained by the District, the County needs to be confident that a fair proportion of those funds will be available for infrastructure provided through the County Council e.g. highway improvements and schools. There is as yet no agreement with the District on how funds will be apportioned, which means that the County Council is not able to be certain that funds will be forthcoming and plan for spending.
3. The CIL that the District has implemented limits infrastructure contributions through S106 agreements. We consider that the Regulation 123 list needs to be amended to address the infrastructure requirements of sites being allocated in Local Plan Part 2, so that more contributions can be gained directly through S106 agreements. The process for amending the Regulation 123 list has not started, yet planning applications for sites which are subject to draft allocations may be lodged. This is particularly pertinent to allocations at Kingston Bagpuize, Harwell Campus and Dalton Barracks which are strategic allocations which should be able to provide for a range of infrastructure directly.
4. The limitation of CIL and S106 funding to fully fund necessary infrastructure means that the County Council frequently faces funding shortfalls on costly strategic transport and education infrastructure required to deal with the impacts of growth and needs additional funding sources to ensure its timely delivery. The Oxfordshire Infrastructure Strategy (OxIS) identifies that delivering the necessary infrastructure to support jobs and housing growth in the county to 2040 is estimated to cost £8.35 billion, of which there is currently a £7.14 billion shortfall. We need mechanisms to ensure that funding comes forward when needed.
5. Although the processes for obtaining government funding, amending CIL documents and spending CIL funds are outside of the Local Plan process, an understanding of the funding which is likely to be available for infrastructure is fundamental to examining whether District Plan allocations can be delivered. If there is little or no prospect of adequate funding being obtained for infrastructure necessary in respect of a proposed allocation, then that site should not be allocated for development.
6. The County is also concerned that there has been insufficient attention to what infrastructure is required to support the development proposals in this Plan, and how much it will cost. An understanding of infrastructure requirements is needed, but the pressure to progress the Plan to submission has meant that key elements

of infrastructure, such as those surrounding transport, have not been adequately investigated through the Evaluation of Transport Impacts nor reflected in evidence documents such as the Infrastructure Delivery Plan. Changes to improve the accuracy of the Infrastructure Delivery Plan will be sought. Specific concerns are set out in more detail in respect of each proposed allocation in this response.

7. Urgent progress should be made on infrastructure evidence, a spending strategy for CIL and revision to the Regulation 123 list. This is considered necessary to make the plan deliverable and therefore be considered sound.

Soundness issue 1 – Further work is required on infrastructure evidence supporting the Local Plan (including the Evaluation of Transport Impacts and the Infrastructure Delivery Plan). The Regulation 123 list should be revised to enable further infrastructure to be obtained through development.

HOUSING NUMBERS

8. This Proposed Submission Local Plan Part 2 proposes 3,420 additional houses to that in the Local Plan Part 1. The total target is 22,760 homes, and the expected housing supply is in excess of this at 24,748. Of this total, 2,200 houses are identified to meet Oxford's Unmet Need.
9. The total housing numbers were tested with the LPP1 Examination. It is acknowledged that there is a consultation on a new SHMA methodology (14 September 2017 to 9 November 2017) but this Local Plan is proceeding in advance of any resolution on that. The County Council has responded on the SHMA methodology consultation identifying a number of concerns with the proposed new SHMA methodology.
10. It is understood that the housing figures are based on all allocations being built out in the plan period with the exception of Dalton Barracks and North West of Grove. Both of those allocations do not include specified numbers of houses beyond the plan period. The allocations could be seen as being misleading in that the full sites are proposed to be allocated, but only a portion of the total housing numbers. Without knowing what the full build-out is likely to be, it is difficult to plan the infrastructure. It is also difficult to ensure that infrastructure contributions are adequately apportioned over the entire site. Our comments on these sites in later paragraphs seek that the allocations identify the total capacity of all sites.
11. The Housing Trajectory is optimistic with early delivery expected on some sites and good rates of build-out on the larger sites. Nevertheless, it is understood that developers have indicated support for these delivery dates.

OXFORD'S UNMET NEED

12. We welcome the District planning to allocate sufficient sites to fully accommodate its share of Oxford's unmet housing need as agreed by the Oxfordshire Growth Board and in line with the Memorandum of Cooperation.
13. The proposal is that 2,200 houses out of a total of 2,860 expected on a mixture of sites from Local Plan Part 1 and Local Plan Part 2 in the 'Abingdon-on-Thames and Oxford Fringe Sub Area' are identified as meeting Oxford's unmet need as set out in Table 2.1:
- North Abingdon-on-Thames – 950 houses as per consent P17/V0050/O
 - North-West Abingdon-on-Thames – 200 houses
 - North-West Radley – 240 houses
 - South of Kennington – 270 houses
 - Dalton Barracks – 1,200 houses
14. We have no objection in principle to the District's strategy of allocating the agreed share of Oxford's unmet need to the Abingdon-on-Thames and Oxford Fringe Sub-Area and providing for it through a combination of strategic allocations from the adopted Local Plan Part 1 and new Part 2 allocations. We consider that a minor amendment only is required to the justification in Para 2.14 to refer to the Sub-Area having greatest potential for frequent and reliable public transport, cycling and walking linkages. The text amendment (set out in the box below) is necessary for soundness given that contributions to improved transport infrastructure are needed.
15. We are pleased to see a commitment from the District to work jointly with Oxford City to put in place arrangements for allocating affordable housing to those in unmet need. We recognise that there are also issues which will need further joint work regarding the total number of affordable houses given that the Vale of White Horse will also need to address their own affordable housing need in this area, and the quantum of unmet need in Oxford City is based on 50% affordable housing rather than the 35% proposed in the Vale of White Horse District.

Soundness issue 2 – Supporting text in paragraph 2.14 should be amended as follows:

'The Abingdon-on-Thames and Oxford Fringe Sub-Area is closest to and has the greatest potential for frequent and reliable public transport, cycling and walking linkages most frequent and reliable public transport linkages to Oxford...'

TRANSPORT OVERVIEW

16. The County Council has produced documents that help to identify transport issues and plan for the future such as the Local Transport Plan 4 which was updated in 2016 and the Oxfordshire Infrastructure Strategy 2017 (OxIS). We are also involved where possible in evidence for government initiatives such as the Oxford-Cambridge Expressway.

17. We have worked with Districts in preparing Evaluations of Transport Impact (ETI) in respect of Local Plans. The ETI use the Oxfordshire Strategic Model. Given its strategic nature, the model does not specifically address local areas, resulting in the need for additional micro-sim modelling in those areas. A particular area of concern is Abingdon, as the strategic model does not appear to validate well and there is an Air Quality Management Area.
18. The Evaluations have raised some concerns such as at Frilford Lights at the junction of the A338 and A415. This was previously identified during analysis for the allocations in Local Plan Part 1 as having significant capacity issues. Further developments in the area will exacerbate this problem.
19. It is not clear yet how the transport impacts at Abingdon and Frilford Lights will be able to be mitigated. A strategy is needed to ensure that development will mitigate transport effects through providing or funding the necessary infrastructure, or that CIL funds will address this. Further transport impacts work needs to be done before Examination hearings.
20. In the absence of funded and programmed transport infrastructure it is possible that the County Council would object to planning applications for development on allocated sites in its capacity as the Highway Authority.

Soundness issue 3 – Further Evaluation of Transport Impacts is needed to ensure that the Plan is supported by a robust and credible evidence base.
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EDUCATION OVERVIEW

21. The County Council produces an annual Pupil Place Plan. Pupil numbers at both primary and secondary level are forecast to increase and new schools are required together with extensions to existing schools. A key concern is how to fund these required additional pupil places, a matter also discussed in the Pupil Place Plan. Unless funding can be assured, it may be that the Local Plan is not effective – that is it may not be deliverable as the identified school places may not be forthcoming.
22. The size of the allocations at Dalton Barracks, Harwell Campus and Kingston Bagpuize means that they create a need for new primary schools. At least one new primary school is expected on Dalton Barracks within the plan period (ultimately it may be three), one new primary school at Harwell Campus, and one new primary school at Kingston Bagpuize. Other additional primary school places will need to be provided through expansions to schools.
23. Additional secondary school capacity will also be needed in the District. A new secondary school is expected on Grove Airfield further to consented development there. There is some existing capacity in Abingdon, but in the longer term there is an opportunity to create a new secondary school at Dalton Barracks. Additional capacity in Didcot is being created within neighbouring South Oxfordshire (Aureus and an as yet unnamed future school at Didcot North East). Expansions

of other existing secondary schools in the Vale are planned (Matthew Arnold, Faringdon, King Alfred's).

24. In addition to primary and secondary schools, publicly funded provision is also expected for Special Education Needs and for early years and child care. The Infrastructure Delivery Plan needs to be amended to make clear the anticipated requirements.
25. It is noted that all requirements for education are subject to review as underlying demographic changes are likely to increase or decrease pressure on school places over the lifetime of this Plan, requiring more or less expansion of capacity accordingly. In addition, ongoing strategic planning of education capacity may result in changes to plans for proposed new or expanded schools.
26. The current Regulation 123 list indicates that funding for school building cannot be obtained through S106 agreements for any sites other than those specifically identified from LPP1. Provision is made only for the land to be provided through S106. Funding from the CIL pot will be limited and there is no agreement in place concerning how much of the pot will be available for schools. The experience in South Oxfordshire has already brought about a proposed amendment to that Regulation 123 list to provide for new school funding on strategic sites. The site development templates, the Infrastructure Delivery Plan and the Regulation 123 list need to be amended and made consistent so that new schools and extended schools can be funded, otherwise there is no certainty that school places (and early years places) can be provided.

Soundness issue 4 – Further urgent work is required, in particular on the Infrastructure Delivery Plan and on revising the Regulation 123 list, to have confidence that the Plan will be effective - that is that it will be deliverable over the plan period in relation to providing for new and expanding schools.

PUBLIC HEALTH

27. We support the inclusion of additional references to health and wellbeing compared to the Preferred Options. With respect to policies covering Dalton Barracks, Didcot Garden Town and the criteria for good design (Section 3.136), the additional guidance on how development can facilitate improved health and wellbeing is also supported.
28. We consider that, in line with some of the other District Councils in Oxfordshire, there should be a requirement to submit a Health Impact Assessment as part of an application for major development. This is supported by NPPF Paragraphs 7, 17, 73, 161 and 171. The findings of any health impact assessments could be used in public consultations to guide the creation of a shared vision for residential development and facilities as set out in NPPF Paragraph 69. Such a requirement would support the Strategic Objectives for building healthy and sustainable communities set out in Part 1 of the Local Plan – ref S 02 and S 04. Unless a requirement for a Health Impact Assessment can be provided without the need to

amend the Plan, the plan should be amended by including such a provision as set out in the box below.

Soundness issue 5 – Text under 1. Introduction of Appendix A: Site Development Templates should be amended as follows:

‘...we will expect every application for the additional sites to be accompanied by:

- a Masterplan which ...
- a detailed Design and Access Statement that ...
- an Infrastructure Schedule that ...
- a Development Delivery Agreement which....
- a Statement of Community Involvement that ...
- A Health Impact Assessment that identifies and takes account of the health status and needs in the area and provides information about how to improve health and wellbeing.

MINERALS AND WASTE

29. The County Council does not have any matters to raise in respect of soundness in relation to Minerals and Waste Planning on this plan.

DEVELOPMENT MANAGEMENT POLICIES

30. The County Council's focus in these comments is on issues of particular concern regarding infrastructure. We have not reviewed the development management policies in detail.

Local Plan Sites

HARWELL CAMPUS

31. We advised in our May 2017 Preferred Options comments that the County Council had no in principle objection to development at Harwell Campus provided that the loss of land does not impact on the scale of forecast job growth. The District has published appropriate evidence indicating that the proposed loss of land will not lead to lower job growth. We note that there is a Statement of Common Ground with OxLEP and the Harwell Science and Innovation Campus Ltd.

32. We support the proposal for a comprehensive development framework set out in Core Policy 15b. The policy provides for this to become a Supplementary Planning Document (SPD), however, it is not clear that the SPD is required in advance of a planning application for development. We seek some revisions to the text to ensure that this is clear.

33. The comprehensive development framework should help ensure that this new Innovation Village is integrated with the Campus. Impacts on the transport network will be minimised through this approach, and the Campus already benefits from the recent opening of north-facing slips on the A34 at Chilton as well as other improvements to the transport network in Science Vale. A new primary school is proposed on site. The primary school will need to be sited in a position which meets the County's school requirements. The need for a primary school is a clear requirement in the site development template in Appendix B. Although these requirements are set out, the County Council is concerned that the Infrastructure Delivery Plan (IDP) may not adequately identify the various works required and is seeking that this evidence document be reviewed, and that infrastructure be funded through S106 where possible (soundness Issues 1 and 4 above).
34. The Harwell Exceptional Circumstances report provides evidence for the proposed allocation of this land which is within the North Wessex Downs Area of Outstanding Natural Beauty (AONB). The County Council is a member of the North Wessex Downs AONB Council of Partners. We note our responsibility under Section 85 of the Countryside and Rights of Way Act 2000 to have regard to the purpose of AONBs in exercising or performing any functions in relation to, or so as to affect, land both within and affecting the setting of the AONB. We understand that the views of the North Wessex Downs AONB Council of Partners, through the AONB office, are being sought to ensure that exceptional circumstances have been established.

Soundness issue 6 – Revision of the Core Policy 15b is required along the following lines: 'Proposals for development within the Campus must demonstrate how they contribute towards a comprehensive approach to development comply with the Comprehensive Development Framework SPD and contribute to infrastructure in the manner set out in that Framework which will require all phases of development to contribute fairly towards the joint responsibilities for transport, education, open space and other infrastructure.'

NORTH-WEST OF GROVE

35. An allocation of land North West of Grove logically helps to deliver the planned Grove Northern Link Road which, although not a strategic route, will be a main connector road through Grove Airfield, this site and Monks Farm. Development here can also support a business case for a rail station at Grove (the safeguarding of a site for which is discussed in paragraph 62). In our May 2017 comments on the Preferred Options, we raised issues about the potential to signalise Brook Lane Denchworth Road Bridge, and the need to consider future bus routes, public rights of way (PROW) and cycle paths. We noted that the relative remoteness of parts of the site may make uses other than residential more appropriate.
36. Since then we have become aware of an additional concern raised by Network Rail regarding the implications for level crossings which are PROW. There are two level crossings adjoining land at Monks Farm, one of which is just to the east

of this proposed allocation. The County is involved as we manage the PROW network and the legal situation is such that PROW cannot simply be closed. Options therefore need to be investigated for the future of these level crossings.

37. A number of the matters raised in our comments at Preferred Options have been addressed in the Appendix A Site Development Template and the County does not have a specific concern with the change from 300 houses to 400 houses in the plan period. However, we are concerned that the Plan is not sound as it is not clear what the eventual complete development of the site will be and there is no suggested mechanism for addressing the development comprehensively through a SPD as there is for Dalton Barracks and Harwell Campus - there is only loose reference to a masterplan in the Site Development Template. Given the issues surrounding coordination of development at Monks Farm to the east and the need to consider this area together with a future potential Grove Station, it is considered that amendments should be made to the Plan as set out in the box below.

Soundness issue 7 – A new policy, along the lines of Core Policy 15b or 8b (which require Harwell Campus and Dalton Barracks Comprehensive Development Frameworks) should be included for North West Grove. This should ensure there is a comprehensive development framework for the whole site, which links in with neighbouring Monks Farm and Grove Airfield proposals, before any development commences.

Soundness issue 8 – The full capacity for development on North West Grove should be identified. This will need to be tested in additional evidence unless there is some mechanism to restrict planning applications to approximately 400 houses.

DALTON BARRACKS

38. The County Council generally supports the proposed removal of land at Dalton Barracks from the Green Belt and its allocation for development. We note that the exceptional circumstances for removing the identified land from the Green Belt are set out in the Proposed Submission Plan.
39. The developer is producing a masterplan for the whole site. This needs to be prepared in tandem with the District's proposed comprehensive development framework. Whether this framework is a Supplementary Planning Document (SPD) or a Development Plan Document (DPD), it needs to be produced involving all relevant parties including the County Council. This framework needs to identify the infrastructure requirements and how the site could be split into more than one application each providing a proportionate amount of the infrastructure. In order to make this clear, an amendment to Core Policy 8b, which requires the comprehensive development framework, is set out in the box below.
40. There is the potential for significant transport effects from development at this site. It is understood that the developers consider that the site has a total capacity for some 4,500 houses. The current Evaluation of Transport Impacts is

based solely on a plan period development of 1,200 houses and therefore any additional development has not been modelled. Further work evaluating transport impacts is required and we consider that further specific modelling is required in the Abingdon area, along the A15 (west) and the A338.

41. The need for sustainable travel options is covered in the Proposed Submission Plan. Some specific comments on the proposed safeguarding for bus/cycle link to a future Park & Ride at Lodge Hill are set out in the later paragraphs 55-56. The potential for bus service improvements will likely be dealt with in detail in the comprehensive development framework - we note that service enhancements will only proceed on the basis that they will eventually be commercial after a period of pump priming. Due to existing MoD use of the site for a currently undefined period, there are challenges to serving the site by direct bus services that align with appropriate distances to bus stops.
42. The comprehensive development framework will set out education requirements. It is anticipated that three primary schools and one secondary school will be needed for some 4,500 houses. It is important that the comprehensive development framework identifies how these are to be funded and sets out how each different phase contributes proportionately. As noted earlier (Soundness issues 1 and 4) the current CIL Charging Schedule and Regulation 123 list does not provide for schools to be funded through S106, apart from the land on which they will be located. CIL receipts may not cover the full costs of schools. We consider that it is likely to be viable here for the developer to provide the schools and that the Regulation 123 list should be amended. Further work is also required on the IDP to make the requirements clear as set out above in soundness issues 1 and 4.

Soundness issue 9 – Core Policy 8b should be amended along the following lines: ‘Proposals for development at Dalton Barracks must demonstrate how they contribute towards a comprehensive approach to development comply with the Comprehensive Development Framework SPD and contribute to infrastructure in the manner set out in that Framework which will require all phases of development to contribute fairly towards the joint responsibilities for transport, education, open space and other infrastructure.

Soundness issue 10 – The full capacity for development on Dalton Barracks should be identified. This will need to be tested in additional evidence unless there is some mechanism to restrict planning applications to approximately 1,200 houses.

EAST OF KINGSTON BAGPUIZE

43. The developers of the proposed allocation at Kingston Bagpuize have been progressing their plans and have completed their Environmental Impact Assessment Scoping (P17/V2579/SCO). It is understood that the developers are proposing in excess of the 600 homes proposed in the allocation, possibly up to 700 homes. The County Council’s main concerns are about securing the necessary infrastructure for the site. This has been identified as including two new roundabouts joined through the site via a high quality link road and a new

one form of entry primary school on a parcel of land large enough for possible expansion to a two form of entry school.

44. It is recognised that a significant amount of infrastructure is being required. The County Council is concerned that the current IDP evidence document does not set this out correctly. The costs of the various elements of infrastructure, for example the two roundabouts (on the A420 and A415) are significantly underestimated in the IDP. It is understood that the developer is currently assessing viability, and it is vital that the costs are not underestimated in this. If the developer considers that the requirements for infrastructure are not fairly and reasonably related in scale and kind to the development, then it may be that the site should not be allocated as there is no other mechanism to achieve the necessary mitigation – for example the two roundabouts and the link road are required because of this site development and are not County Council highway projects which are otherwise required.
45. The issue of whether certain elements of infrastructure are provided through CIL or S106 is one which is outlined earlier (Soundness issues 1 and 4). If the Regulation 123 list is not changed, then the County Council would seek that the costs of providing a new primary school be met from the CIL pot (including the additional land sufficient for a 2 form of entry school given that the site requires only a 1 form of entry school). The County Council currently has no guarantees over the District's spending of CIL and whether enough money would be forwarded from CIL to cover the costs of the primary school.
46. Aside from the issues of viability, two amendments to the Site Development Template in Appendix A are needed to make the plan effective. A minor amendment is required to make it clear that the developer will need to not only 'consider potential options' to alleviate current traffic flows through the centre of Kingston Bagpuize but also undertake the necessary works further to a S278 agreement with the County Council. Specific mention of the Frilford lights junction is also required, as congestion currently exists and early modelling indications suggest that a significant proportion of traffic will flow through this junction from the development site, and therefore mitigation works will be needed.

Soundness issue 11 – Further evidence is needed to be confident that the site is deliverable and that the costs of development are not being underestimated.

Soundness issue 12 – Text in Appendix A: Site Development Templates – East of Kingston Bagpuize with Southmoor be amended as follows: '~~Consider potential options~~ Provide measures to alleviate traffic flows through the centre of Kingston Bagpuize with Southmoor' and 'Contribute towards infrastructure improvement on the A420, A415 (including at Frilford lights) and any necessary mitigation measures identified through the site Transport Assessment.'

SOUTH-EAST OF MARCHAM

47. The draft plan proposes 90 homes south-east of Marcham. Para 2.48 of the draft plan assumes that the majority of additional traffic associated with this allocation

would travel towards Oxford, Abingdon and Science Vale (i.e. away from Marcham) and therefore would not adversely impact the Air Quality Management Area (AQMA). The County accepts that this relatively small number of houses will have less of an impact on the AQMA compared to the Preferred Options allocations which we objected to in our May 2017 comments.

48. Marcham is not well set for growth given that it is not currently served by fast and frequent bus connections to key employment locations and both Marcham Interchange to the east and the Frilford lights junction to the west experience congestion. The County Council is concerned that any contributions to improved infrastructure and services from development on this site will be limited, as all contributions must be directly related to the development as well as fairly and reasonably related in scale and kind. While a Marcham Bypass is proposed to be safeguarded (discussed later in this response), there is no prospect of it being funded in the plan period, and contributions towards it will not be sought for that reason. Improvements to the Frilford lights junction are likely to be required during the plan period but it is not clear how these will be funded and as noted in the last paragraph it is anticipated that the majority of traffic will travel east. The transport assessment on any application for this site must robustly examine the impact, and propose and subsequently deliver transport mitigation solutions which are acceptable to Oxfordshire County Council.
49. The IDP does not clearly identify all the costs associated with infrastructure at this site and needs to be amended as set out in soundness issues 1 and 4.

NORTH OF EAST HANNEY and NORTH EAST OF EAST HANNEY

50. As noted in our response on the Preferred Options, the two proposed allocations at East Hanney are relatively well located for public transport and the primary school is being expanded to accommodate growth, therefore any County Council issues in respect of these two sites will be localised ones. The two site development templates in the Appendices are reasonably consistent, but there are inconsistencies in the IDP which is supporting evidence and needs to be amended as set out in soundness issues 1 and 4.

Safeguarding for Transport Schemes

51. The County Council generally supports safeguarding for transport schemes. Support for safeguarding does not mean that there is commitment to funding a scheme. Details of each situation and whether the County Council is promoting the scheme are set out in specific comments below.

A34 BUS LANE

52. The County Council supports safeguarding land along the A34 for a bus lane between Lodge Hill and Hinksey Hill as it is considered to be essential to the delivery of Rapid Transit services in the future. While this is not currently funded

and may not be delivered in the Plan period, it is part of the Oxford Transport Strategy in LTP4 for better bus services associated with a new Park & Ride at Lodge Hill.

CUMNOR PARK AND RIDE

53. The County Council supports safeguarding land for a future Cumnor Park & Ride. This is part of the Oxford Transport Strategy in LTP4 and while not currently funded, it is a longer term project.

LODGE HILL PARK AND RIDE AND BUS/CYCLE LINK

54. The Proposed Submission Plan amends the Preferred Options proposal which included land safeguarded for the Lodge Hill Park & Ride and Lodge Hill slips. The County Council supports safeguarding for a future Park & Ride at Lodge Hill and the Lodge Hill slips which are in accordance with the Oxford Transport Strategy in LTP4. Design work is starting on the Lodge Hill slips given that funding has been secured. A Park & Ride is currently programmed in the period 2026 to 2031, however, the exact date will be based on funding and priorities. For this reason, amongst others, the Park & Ride cannot be part of any mitigation proposal for a site proposed for allocation such as Dalton Barracks.
55. The District's proposal for a bus/cycle link between Dalton Barracks and the Lodge Hill Park & Ride is queried. It is not clear whether a direct bus and/or cycle link to the Park & Ride is necessary or deliverable. It may not be identified as a necessary or appropriate piece of infrastructure for 1,200 homes at Dalton Barracks, nor possibly for the larger development in the longer term. We consider that there is insufficient evidence to support the identification of this scheme. There is also the risk that by suggesting that this be a public transport solution for Dalton Barracks, it could undermine efforts to ensure the site is served by bus services to Abingdon and Oxford, and destinations within Science Vale. A change to the Plan is therefore required as per the box below.
56. It is understood that the safeguarding for the bus/cycle link has come from the 'Abingdon to Oxford Sustainable Transport Study'. The County Council considers that this is not robust evidence for this matter. The study includes no discussion of projected demand or the viability of constructing such a route. The need to acquire extensive stretches of land in third party ownership may jeopardise the viability of this scheme in a cost-benefit analysis. The County Council has no plans to include such a proposal in its Local Transport Plan. Instead, the County Council seeks that the 'Abingdon to Oxford Sustainable Transport Study' be revised in respect of its various references to this (e.g. para 5.3.19, 6.4.7, 6.4.11, 6.4.31). More information on this is given in the Evidence part of this response.

Soundness issue 13 – The proposal to safeguard land for a potential bus/cycle link between Dalton Barracks and Lodge Hill should be deleted (Core Policy 12a, text in 2.82 and Appendix B).

MARCHAM BYPASS AND FRILFORD LIGHTS

57. The safeguarding of Marcham Bypass and Frilford Lights brings together on one map the proposal in the Preferred Options and the existing safeguarding in LPP1 for the signalised junction at Frilford.
58. The alignment of the proposed Marcham Bypass was identified many years ago and was previously safeguarded. The safeguarding has been reinstated having regard to the recently designated Air Quality Management Area in Marcham and the need to ensure that alternative ways of addressing traffic in this location are not compromised. However, there is no current proposal to deliver such a bypass. The text in 2.83 adequately identifies this.
59. Safeguarding of land for improvements to the Frilford lights junction is supported. Improvements to this junction may be required as direct mitigation for development allocated in this LPP2, or alternative funding required.

IMPROVED ACCESS TO A34 NEAR MILTON PARK

60. As referred to in our May 2017 response to the Preferred Options, land for slips serving Milton Park can be safeguarded in case it is required. Ongoing transport assessment will identify whether it is needed - it is already known that there are likely future problems at Milton Interchange which will necessitate interventions. It is accepted that no scheme exists but that future growth will exacerbate issues at the Milton Interchange. Given the importance of Milton Park as a major employer in Oxfordshire, it is deemed necessary to investigate all options further. The safeguarding is merely an indication of one potential solution by providing direct access to Milton Park. Funding for such a proposal is not currently known and the views of Highways England need to be sought as technical work is prepared.

Soundness issue 14 – If up to date research prior to the Plan being adopted indicates the need for amendment, the safeguarding the access to the A43 near Milton Park should be subject to modifications to reflect the up to date evidence.
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MILTON HEIGHTS PEDESTRIAN AND CYCLE BRIDGE

61. Funding has been secured through development at Milton Heights for a new pedestrian and cycle bridge across the A34 from Milton Heights. This safeguarding ensures that the pedestrian/cycle route extends to the junction of the A4130 allowing for continuation to the link through the Backhill Lane tunnel. The map has been amended from the Preferred Options version in consultation with the County Council.

GROVE RAILWAY STATION

62. Two areas are safeguarded for a future Grove Railway Station in Appendix B, based on current research on the best two options to pursue. We support safeguarding land for a station at Grove to serve local growth and the wider catchment area. Core Policy 19a and the text in 2.133 are supported. If additional evidence becomes available, e.g. to reduce the two options to one, then modifications may be needed.

Soundness issue 15 – If up to date research prior to the Plan being adopted indicates the need for amendment, the safeguarding for a Grove Railway Station should be subject to modifications to reflect the up to date evidence.

DIDCOT-CULHAM RIVER CROSSING

63. The safeguarding map in Appendix B amends that already contained in Local Plan Part 1. The amendments exclude Scheduled Ancient Monument areas from the two optional routes. Core Policy 18a and paragraph 2.132 which explain the amendment are supported.

Evidence

INFRASTRUCTURE DELIVERY PLAN

64. There are a number of errors in the Infrastructure Delivery Plan (IDP) published as evidence supporting the Proposed Submission Local Plan. As a number of necessary infrastructure items are either missing or the indicative cost is too low, this could give the impression that site allocations are more viable than they are in reality.

65. The County Council seeks that changes are made to the IDP as soon as possible to inform the Examination. It is noted that the IDP is meant to be viewed as a 'live document' able to be updated. We are happy to share data to help derive appropriate costs.

66. The IDP needs to be updated to reflect additional Evaluation of Transport Impacts (ETI) work that is deemed necessary. At the moment, the ETI cannot be relied on to have identified all the optimum transport mitigation measures needed for the proposed development allocations.

67. It should be made clear that the IDP seeks only to list the forecast infrastructure requirements. The key rationale for the IDP should be to identify broad infrastructure needs for the purpose of assessing whether proposed allocations are viable. Additional infrastructure requirements may result from detailed evidence, such as Transport Assessments, associated with planning applications.

EVALUATION OF TRANSPORT IMPACTS

68. The Evaluation of Transport Impacts (ETI) work has been conducted too quickly and does not provide sufficient evidence for the County Council to make an informed decision on the transport impacts of the proposed allocations.
69. Further work is required in relation to the Abingdon network and how this is performing. The Lodge Hill Slips will create some capacity in the Abingdon central network, but it is unclear what capacity will remain with the significant additional growth planned in the Abingdon area e.g. at Dalton Barracks. Currently, the Abingdon network suffers from severe congestion at peak times (including weekends). This involves solid queues along Marcham Road, Drayton Road, Ock Street, Vine Yard and Bridge Street in both AM and PM peaks. It is unclear how this situation can be improved with the addition of growth in LPP1 and LPP2 with only the Lodge Hill Slips being provided as additional infrastructure to mitigate.
70. Given the proximity of Dalton Barracks and Marcham (in the Vale of White Horse) and Culham and Berinsfield (in South Oxfordshire), a cumulative impacts assessment on Abingdon needs to be conducted to inform the full impact. This work is underway but will not be available until after the Regulation 19 consultation has ended. The County Council is unable to comment meaningfully until it sees this additional evidence. Until evidence can be provided to the contrary, the assumption is that any development at Dalton Barracks is reliant on the provision of Lodge Hill Slips to provide some capacity in the Abingdon area. This means that there should be no home occupations at Dalton Barracks before the Lodge Hill slips are open.
71. Additionally, without confidence in how the Abingdon network is validating, this has a knock-on effect at Marcham Interchange. Whilst it is widely accepted that capacity problems will exist (without Lodge Hill Slips), it is uncertain what the impact is with additional development and how this might be mitigated.
72. The LPP1 ETI stated that the Frilford Lights junction on the A338 and A415 is at capacity. With additional growth at Kingston Bagpuize, Marcham and Dalton Barracks, it may become over capacity. A scheme for improving the junction was identified for modelling purposes at the LPP1 stage. This identified additional lanes and flares (road widening). It is not known what the cost of this would be and whether it is deliverable. The importance of an improvement at the junction of two 'A' roads should not be underestimated.
73. In the LPP1 ETI, there was an assumption that all strategic infrastructure would be in place at 2031. A test should have been undertaken whereby all unfunded infrastructure was removed, to test the impact of the development on the highway network if funding is not secured. The lack of this test, coupled with the now implemented CIL, results in difficulties commenting on planning applications as it is not clear whether effects on the highway network will be severe if developments proceed before all the infrastructure is in place.

74. Although the LPP2 ETI report does not clarify the exact bus service improvement for Dalton Barracks in Section 7.1, it is assumed this is 4 buses per hour. This was included against the advice of the County Council and should be clarified. Our view is that service by 4 buses per hour is unlikely to be achievable as it will not become commercially sustainable. This is likely to be the case with a full build-out of some 4,500 dwellings let alone with a lesser number such as 1,200 dwellings by 2031.
75. The volume to capacity (V/C) links within the ETI report, do not seem to alter from 2031 'do minimum' to 2031 Option 2. This is the case even in areas that are signal controlled such as Frilford Lights and the central Abingdon network. In such sensitive locations any additional traffic can result in disproportionate delay. Recent queue length surveys along Marcham Road, Ock Street and Drayton Road in Abingdon demonstrates that queues exit block throughout this network up to Marcham Interchange and Preston Road creating significant delay akin to gridlock.
76. Assumptions about Dalton Barracks need to be clarified given proposed access to the A34. If the site comes forward in two parcels, one which is remote from Marcham Interchange, it is unclear what impact this could have on the local highway network. This could be particularly pertinent to Sunningwell and access northbound towards Oxford and beyond. Furthermore, the ETI is not adequately reflecting flow data on Foxcombe Hill (Boars Hill) and Hinksey Hill/Oxford Road. Even without development in place, this suffers from significant congestion and delay.
77. More detailed work is required regarding highway mitigation. It is acknowledged that Milton Interchange does and is expected to continue to suffer from congestion. This has significant impacts on access and egress from Milton Park in the AM and PM peak respectively. Scheme options should be refined and tested in more detail to assist the development of business cases. Equally, the proposed bus lane on the A34 should be tested more thoroughly through the work associated with rapid transit lines and remote Park & Ride sites. Both will need to reflect ongoing work associated with the Oxford to Cambridge Expressway and close cooperation with Highways England.
78. The general approach to the assessment of highway network performance may not provide the best measure of localised junctions. It is at these key nodes where capacity issues exist. Further and more detailed work will need to be conducted as development sites progress. This should include appropriate modelling packages with robust traffic flow data including queue length surveys.

SUSTAINABLE TRANSPORT STUDY

79. The Sustainable Transport Study for the Abingdon to Oxford Corridor, October 2017, provides an initial look at the sustainable transport challenges associated with some of the additional sites, as noted in Topic Paper 5 (4.23). The study does not comprehensively identify all of the issues or interventions required, particularly for infrastructure. It does not adequately evaluate proposed

interventions in a robust manner. As a result, considerable further work will be required to identify the necessary sustainable transport interventions required for each site.

80. There is a lack of clarity on what the authors of the Sustainable Transport Study consider to be appropriate/necessary mitigation for the allocated 1,200 dwellings at Dalton Barracks and that which is considered appropriate/necessary for 4,000+. This makes it challenging to judge its recommendations. This is where the document's utility as evidence for LPP2 is flawed.
81. The most significant proposed intervention in the study is for a combined busway cycleway between Dalton Barracks and Lodge Hill. There has not been adequate work on this for Oxfordshire County Council to be able to support the safeguarding of land for this proposal. Key issues with the proposed busway link include:
- The assumption that significant infrastructure (Lodge Hill Park & Ride) and significant service (Bus Rapid Transit route) will be delivered. As both are unfunded this should not be assumed. Even if both come to fruition this is likely to be well after the plan period, and therefore a significant proportion of housing at Dalton Barracks is planned to be delivered in advance of it.
 - It is not obvious what the commercial case would be to extend a Bus Rapid Transit bus route from Lodge Hill to Dalton Barracks versus anywhere else e.g. Abingdon Town Centre.
 - The study does not adequately make the case for such a significant piece of infrastructure.
 - Not enough focus has been given to how a direct bus service could be enhanced from Dalton Barracks to Oxford and Abingdon which could be achieved without other, and in the County's view, lower priority/untested infrastructure (Park & Ride and Busway).
82. If Dalton Barracks development commences in separate parcels (e.g. north and south), it is unclear how this will be adequately served by bus given potential distances to bus stops. Without a spine road within the site to connect the two parcels this is a challenge. Whilst making mention of this challenge, the Sustainable Transport Study does not address resolving the issue. Measure B1 promotes the trialling of a bus service with a frequency of 10-15 minutes for Dalton Barracks. We believe that a quantum of 1,200 dwellings will not be sufficient to sustain this frequency of service on a commercial basis and therefore does not support this recommendation. The provision of service frequency improvements will need to be reviewed when proposals come forward for a volume of housing beyond that which has been proposed for LPP2.
83. On pages 15-17, figures 4, 5 and 6 (showing Dalton Barracks, Marcham, and Kingston Bagpuize) depict a buffer of 640m showing catchment areas around the site allocations to "demonstrate the extent to which current bus provisions will serve the site". However, by using a buffer from the edge of the sites, these give an unrealistic view of the actual extent to which these sites are served by public transport within what is generally considered to be an acceptable walking distance of 400m. This may have the consequence that sites are considered to be adequately served by existing public transport routes, when in fact a

considerable portion of the site is significantly beyond the optimal 400m walking distance. This is particularly pertinent to the Dalton Barracks site.

84. The STS promotes capacity improvements at the Frilford Lights in para 6.2.6 which appear to require third party land. It is unclear what research was undertaken to enable the report to suggest lane widening on certain approaches to the junction. It is also unclear whether this is in addition to modelled proposals in the ETI. Para 6.2.8 promotes “demand/queue responsive traffic lights” at the Frilford Lights junction, which the County Council agrees should offer some degree of capacity improvement.
85. Para 6.2.10 lists bus routes 15, 31 and X30 as going through the Frilford Lights junction which is now incorrect. The report promotes bus priority signals at this junction, which due to the low frequency of bus movements appears to offer a low cost/benefit ratio. Additionally, without separate ‘bus only’ lanes through the junction it is unclear what benefits would be realised, as a bus would continue to be held up by other traffic in an all-vehicle lane. It is also unclear whether this includes any mitigation proposed in LPP1 ETI modelling.
86. Measures B7 and B9 promote the improvement of bus stop infrastructure, including the provision of RTI displays and better waiting facilities. The principle of these proposals is supported by the County Council. Contributions to the improvement of bus stop infrastructure are normally sought from developments.
87. There should be comprehensive walking and cycling corridor studies with scheme identification on a par with continental design standards. Promotion of existing, sub-standard routes such as Faringdon Road is unhelpful and unlikely to encourage the change in mode required. Key and nearby destinations, such as Abingdon, should be given priority and the studies should refer to the County’s recently adopted Walking and Cycling design guides. Wherever possible, hybrid cycle lanes should be explored. Maintaining substandard cycling infrastructure is not appropriate for new development and other options should be explored including new and alternative routes.
88. It is noted that no reference is made to the fact that there is a gap of footway provision for 150m along Barrow Road west of the junction with Faringdon Road. It is therefore unclear what the envisaged walking route is for residents living in the southern area of the Dalton Barracks site.
89. Cycling from Dalton Barracks to Abingdon via existing routes has been considered but not proposed routes that use infrastructure to serve the LPP1 sites in North Abingdon. Linking with proposed cycling infrastructure would provide a route to North Abingdon, schools, bus routes and Radley Station as well as potential onwards journeys to Oxford. Clarity is required as to whether the improvements identified for AT4 would be seen as complementary to AT12. We believe that a route along Dunmore Road, or through allocated developments to the north of Dunmore Road, is likely to be more attractive and more deliverable (in respect to feasibility and viability) than a separate cycleway north of the A34. Provision of improvements identified in AT4 (or similar) would potentially negate the need for the provision of AT12.

90. Measure AT5 proposes improvements to cycle route NCN5 between Kennington and Oxford, while measure AT6 proposes the provision of a cycle route connecting Twelve Acre Drive and White's Lane. The principle of these proposals is supported and work is ongoing with site promoters on LPP1 sites to deliver this key piece of cycling infrastructure.
91. Measure AT7 acknowledges planned improvements to cycling provision between Abingdon and Radley Station and notes that connections should be made from Dalton Barracks to these planned improvements. It would appear that this issue is adequately covered by the proposals in AT4 and AT6, so it is unclear what is added by the inclusion of AT7.
92. Measure AT8 recommends the provision of advisory cycle lanes on Cumnor Hill. Although the principle of improving cycling provision along this route is supported, more work would need to be undertaken to understand how this would be achievable. It is the County's preference, wherever space allows, that hybrid cycle lanes should be provided rather than advisory cycle lanes.
93. Measure AT9 recommends the provision of a combination of on-carriageway and off-carriageway cycle improvements along the B4017 between Dalton Barracks and Cumnor. More work needs to be undertaken to understand whether this would be achievable within the highway and the viability of such a scheme with a view of likely usage.
94. Measure AT10 recommends the improvement of public rights of way, primarily for leisure use. The principle of this proposal is supported, but the potential for the improvement of these routes for other trips should be considered. For example the improvement and upgrading of footpath number 333/7/10 should be explored as a potential walking and cycling link from Dalton Barracks to Abingdon via Copenhagen Drive.
95. Measure AT11 proposes improvements to cycle infrastructure between Marcham and Abingdon, to include improved painted markings, signage and priority measures at key junctions. The principle of improving this route is supported by the County Council but the report is lacking in ambition in this respect.
96. There appears to be a paucity of evidence underpinning the ranking of the costs and benefits of the various measures identified within the Smart Mobility package. With many of these measures being very new and in some cases untested, the benefits are theoretical and the viability of the measures unproven. Where examples are given (e.g. Betterpoints in Reading), it would be helpful to have an estimation of the impact they have had on sustainable transport. Table 6.9 makes it appear that the Smart Mobility measures offer best value for money, highest benefits and lowest costs, which in turn could lead to the funding of unproven pilots at development sites at the expense of more traditional but proven measures such as enhancements to bus services.
97. Little thought has been given the viability and/or the likelihood of proposals coming forward in the STS. This has meant that no form of scheme priority has

been given. Additionally, it is unclear what would be necessary in the Local Plan period and what might be required post-2031.

98. The lack of time taken to prepare this report is evident and the County Council cannot support it as an evidence base.

SITE SELECTION PAPERS

99. The County Council provided some initial advice on sites which has been used in the site selection papers which are available as supporting evidence for the Local Plan. The papers have not been reviewed in detail, but it is noted that in some cases they assess sites positively although they are not proposed for allocation. This does not in any way restrict comments from the County Council in future should sites be proposed for allocation or planning applications made.

Local Plan 2031 Part 2
Publication Version
Representation Form

Ref:

(For official
use only)

Name of the Local Plan to which this representation relates:

Vale of White Horse
Local Plan 2031 Part 2

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

This form has two parts:

Part A – Personal Details

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

Part A

1. Personal Details*

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

2. Agent's Details (if applicable)

Title	Mrs	
First Name	Susan	
Last Name	Halliwell	
Job Title (where relevant)	Director for Planning and Place	
Organisation representing (where relevant)	Oxfordshire County Council	
Address Line 1	County Hall	
Address Line 2	New Road	
Address Line 3	Oxford	
Postal Town	Oxfordshire	
Post Code	OX1 1ND	
Telephone Number		
Email Address	southandvale@oxfordshire.gov.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?

Please see attached

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

4. (1) Legally compliant

4. (2) Sound

4. (3) Complies with the Duty to Cooperate

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 see attached

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 see attached

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?

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:

As the County Council for Oxfordshire, we should attend to explain our comments and help the Inspector address any queries in respect of issues the County has responsibility for.

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

Signature:

Date:

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by Vale of White Horse District Council for a period of 6 months after the Local Plan is adopted.

Would you like to hear from us in the future?

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

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

Please do not contact me again

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

Please see attached

Alternative formats of this form are available on request. Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email planning.policy@whitehorsedc.gov.uk

Please return this form 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