

**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](mailto: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	Mr	
First Name	Guy	
Last Name	Wilkin	
Job Title (where relevant)	Secretary	
Organisation representing (where relevant)	HarBUG (Harwell Campus Bicycle Users Group)	
Address Line 1	c/o 1.68 Diamond House	
Address Line 2	Harwell Campus	
Postal Town	Didcot	
Post Code	OX11 0DE	
Telephone Number		
Email Address	secretary@harbug.org.uk	

**Sharing your details:** please see page 3

## Part B – Please use a separate sheet for each representation

Name or organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph

3.113 to  
3.118

Policy

DP 16

Policies Map

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

4. (1) Legally compliant

Yes

☐

No

☐

4. (2) Sound

Yes

☐

No

☒

4. (3) Compiles with the Duty to Cooperate

Yes

☐

No

☐

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. Please be as precise as possible.

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

Oxfordshire County Council will issue Local Cycling & Walking Infrastructure Plan(s) (LCWIPs) during lifetime of this Local Plan. The Government's Cycling & Walking Investment Strategy (CWIS) expects Local Land-Use Plans to explicitly reference LCWIPs. But this Local Plan fails to do so. (Relevant government guidance quoted at end of this form.)

**In order for the Local Plan to operate correctly after LCWIP issue, the reference to LCWIPs must be included now.**

(Continue on page 4 /expand box if necessary)

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

Proposed additional wording:

"Oxfordshire County Council will issue Local Cycling & Walking Infrastructure Plan(s) (LCWIPs) during the lifetime of this Local Plan. Supplementary Planning Documents (SPDs) may be issued accordingly. Compliance with any such LCWIPs and SPDs will be a condition of planning approval"

(Continue on page 4 /expand box if necessary)

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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:

*Officer response to earlier 'Preferred Options' consultation (April 2017) only went part-way to address concerns around cycling policy. The Local Plan must facilitate the implementation of modern cycling infrastructure, fit for the future. As it stands, the Local Plan is not sufficiently robust to require developers to properly address cycling. Government and County Council policy for cycling is only effective when the planning system enforces it. Thousands of new homes are to be built in the Vale in the next few years. It would be shameful if these large new developments are constructed without proper cycling provision.*

**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:

21<sup>st</sup> Nov 2017

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

☒

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Please do not contact me again

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**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.**

Further comment in support of response to Question 5 above:

The Local Plan's Core Policy CP35 commits to the promotion of cycling. Local Plan Part 2, Chapter 3 is supposed to set out **how** this will be done.

Oxfordshire County Council has **already secured** Government assistance to prepare and issue Local Cycling & Walking Infrastructure Plan(s) (LCWIPs) – **it is happening now**. The Local Plan needs to reference LCWIPs.

The relevant Government LCWIP technical guidance is quoted here:

*"2.29 The benefits of incorporating LCWIPs into local planning policy are to:*

- ensure that appropriate consideration is given to cycling and walking in all local planning and transport decisions, and identify potential policy conflicts*
- add to the evidence base which can be used to support a Local Plan, Neighbourhood Plan or Local Transport Plan*
- enable the consideration and adoption of wider policy levers to encourage more walking and cycling*
- enable authorities to seek appropriate contributions to the provision of walking and cycling infrastructure when drawing up the Regulation 123 list for the Community Infrastructure Levy; through planning agreements in the form of Section 106 obligations; and when Section 278 highway agreements are made*
- identify places where new strategic cycling or walking routes can be delivered by a new development, and ensure the protection of alignments for future planned cycling and walking routes*

*"2.30 Preparing LCWIPs should also help authorities to consider the impact of planning applications and other proposed land use changes on existing and planned cycling and walking infrastructure, and to identify sites that are well served, or capable of being well served, by cycling and walking routes. The existence of a LCWIP will assist developers in the preparation of Travel Plans, Transport Assessments and Statements."*

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## Part A

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First Name	Guy	
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Job Title (where relevant)	Secretary	
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Telephone Number		
Email Address	secretary@harbug.org.uk	

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## 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

3.119 to  
3.123

Policy

DP 17

Policies Map

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

4. (1) Legally compliant

Yes

☐

No

☐

4. (2) Sound

Yes

☐

No

☒

4. (3) Compiles with the Duty to Cooperate

Yes

☐

No

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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.

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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.

Proposed additional wording:

“Oxfordshire County Council will issue Local Cycling & Walking Infrastructure Plan(s) (LCWIPs) during the lifetime of this Local Plan. Supplementary Planning Documents (SPDs) may be issued accordingly. Compliance with any such LCWIPs and SPDs will be a condition of planning approval”

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Local Plan Core Policy CP35 commits to the promotion of cycling. Chapter 3 of Part 2 of Local Plan is supposed to set out how this will be done. But there is no explicit requirement for Transport Assessments and Travel Plans to address cycling issues – such as connectivity and network planning - in their own right. The current limited reference to Cycling Design Standards does not cover these aspects.

(Continue on page 4 /expand box if necessary)

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Proposed additional wording:

“Transport Assessments & Travel Plans must **explicitly** address cycling connectivity and cycle movements. These must be analysed and planned in their own right, and not as an adjunct to vehicle or pedestrian movements. The analysis and planning must conform with the Oxfordshire & Science Vale Cycle Strategies, LCWIP plans, and town/parish Neighbourhood Plans. To this end, developers are strongly advised to consult the competent cycling authority, Oxfordshire County Council, as early as possible in the design process.”

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Further comment in support of response to Question 5 above:

Vale of White Horse Planning Authority has often approved planning applications which have demonstrably inadequate cycling provision. Developers have claimed conformance – often successfully – by treating cycling as an adjunct to vehicle movements, or by the inappropriate use of shared-use footways.

The new Local Plan will now reference Oxfordshire's Cycling Design Guide. The Design Guide covers the design of specific infrastructure, but on its own does **not** address issues such as connectivity and network planning. Forthcoming Local Cycling & Walking Infrastructure Plans (LCWIPs) will help. But for larger-scale developments, the Local Plan should require that Transport Assessments & Travel Plans **explicitly** address cycling **in its own right**. These Assessments & Plans would include proper analysis of connectivity, demand lines and network planning.

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