

20 September 2018
Delivered by email

Mr D Reed,
VoWH LPP2 Examination,
C/O Ian Kemp,
16 Cross Furlong,
Wychbold,
Droitwich Spa,
Worcestershire,
WR9 7TA

Ref: DAVR3005

Dear Mr Reed

VALE OF WHITE HORSE LOCAL PLAN PART 2 EXAMINATION

REPRESENTATIONS ON THE SLC RAIL REPORT

This submission is made on behalf David Wilson Homes (Southern) (hereafter referred to as DWS) in response to the VoWH LPP2 Inspector's invitation to comment on document HEAR06.3 paper which was prepared by SLC Rail in relation to land to be safeguarded for the reopening of Grove railway station.

As you will be aware, DWS submitted detailed representations with respect to land located to the east of the A338 in Grove as part of the Regulation 19 Stage of the emerging Vale of White Horse (VoWH) Local Plan Part 2 (LPP2). As set out in the Vision Document for the site, which is referred to as 'Tulwick Park', DWS considers that this site has the potential to deliver a residential led mixed use development that can play an important role in supporting the sustainable transport strategy that underpins the Local Plan. For example, it has been shown within the Transport Feasibility Appraisal (TFA) prepared by Motion (on behalf of DWS) that Tulwick Park has the potential to deliver:

- 600 residential units
- 1.7 Ha of flexible employment floorspace
- 0.5 Ha mixed use local centre and a primary school
- A 350 space park and ride facility
- Safeguarded land for the delivery of Grove Railway Station.

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As set out in the TFA, the ability to help facilitate the re-opening of Grove railway station is a significant positive aspect of this site. As you will be aware from the recent Examination Hearing session with respect to Matter 6, DWS considers the removal of land located to the east of the A338, which was previously safeguarded in Local Plan Part One (LPP1), is extremely short sighted. Concerns in this regard were raised at the Hearing session on 4th September by Motion as well as by Strutt & Parker acting on behalf of Williams F1.

It is in our experience, highly irregular for evidence that the Council is relying upon to justify specific planning policies, such as a report prepared by SLC Rail in September 2017, not to be published on submission of the Plan (or appended to Topic Paper 5) despite it being used to justify the revised approach to safeguarded land at Grove (para. 5.4 of Topic Paper 5 refers). Similarly, it is highly unusual for evidence; namely the 'Wantage and Grove Station Statement of Opinion – Report' (HEAR06.3), to be submitted on the morning that Matter 6 was considered. You will be aware that at the hearing session DWS raised an objection with respect to this late submission of evidence.

Setting aside our concerns related to due process, we do welcome the opportunity you have provided DWS (and others) to review the content of the HEAR06.3 paper, which was prepared by SLC Rail, and respond accordingly. Given the amount of time that was spent debating this aspect of the wider Grove/Wantage area, it will not come as a surprise to you that DWS remains convinced the VoWH strategy for the proposed safeguarding of land for Grove Railway Station is short-sighted and may not result in a deliverable station.

This is particularly evident given that the conclusions reached with respect to the selection of safeguarding sites are at best confusing, but more worryingly, are contradictory and omit to take into account information that was submitted to the Council prior to the SLC report regarding the availability of land. Indeed, one may reach the conclusion that the evidence base has been tailored to justify the continued omission of land located to the east of the A338.

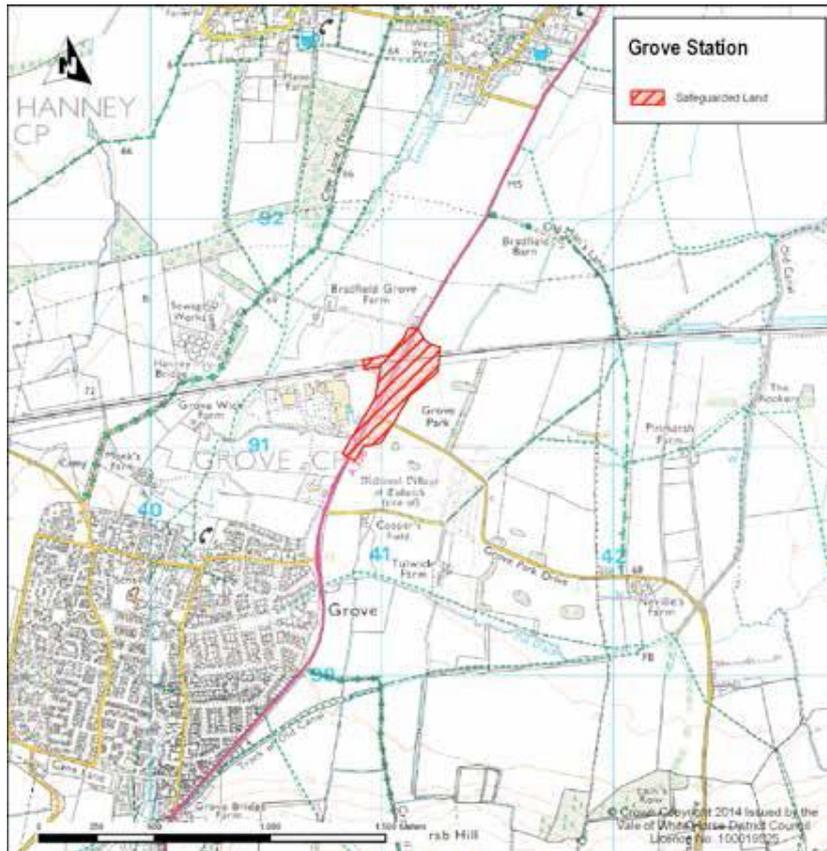
The following text therefore sets out our concerns on behalf of DWS, which we trust you will find helpful when reviewing the overall soundness of the Plan with respect to the South East Vale Sub-area.

In short, DWS considers that it is essential that the land to the east of the A338 is reinstated as safeguarded land to increase the overall likelihood of Grove Railway station being re-opened in the future.

Safeguarded Land under LPP1 and LPP2

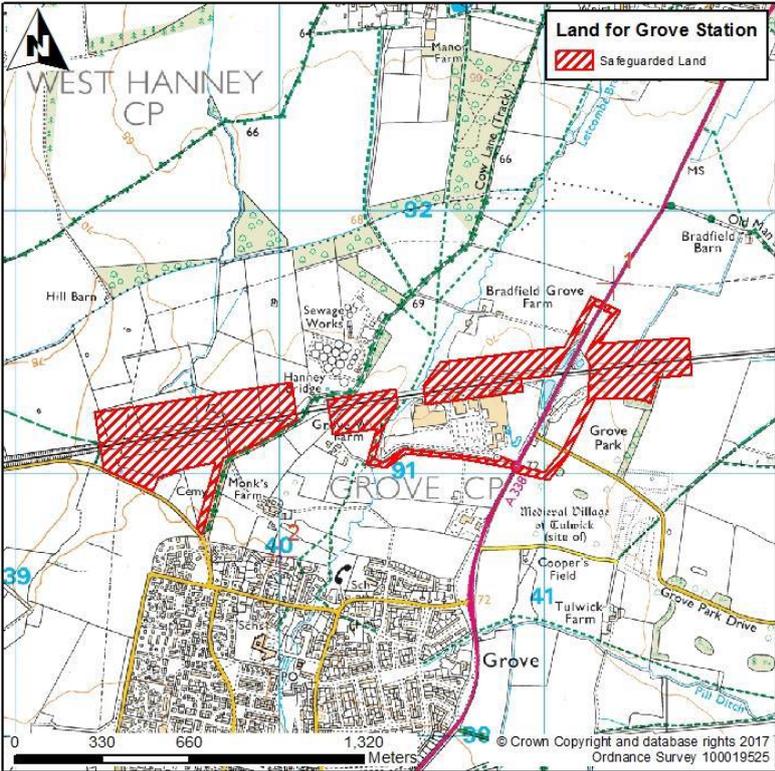
Before setting out our representations on the SLC Rail report, we consider that it is useful to summarise the areas which the VoWH has sought to safeguard for the reopening of Grove Railway Station.

In the LPP1, Policy 18 relates to the Safeguarding of Land for Transport Schemes in the South East Vale Sub-Area. The safeguarded land was identified on a series of plans at Appendix E of LPP1, with the land for Grove Railway Station on plan E8 as replicated below. DWS note that this area was very tightly drawn and primarily to the east of the A338, presumably to reflect the layout of the station that was approved by VoWH Ref: P05/V0738/O (see Appendix A of this letter).

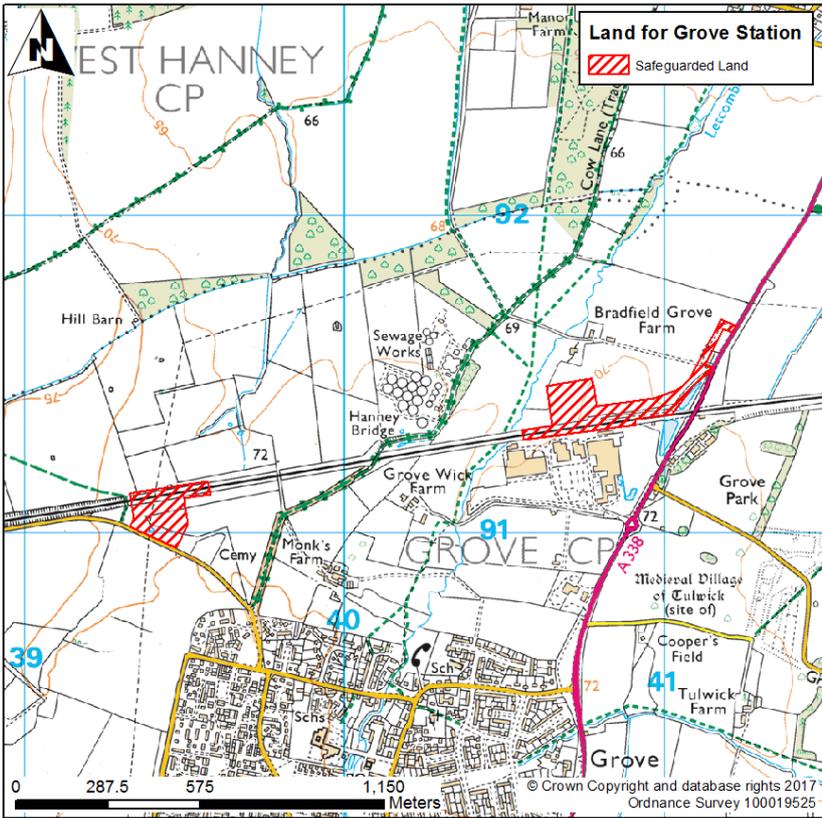


The LPP2 has sought to revise the safeguarded land at Grove.

In the LPP2 Preferred Options of March 2017, Appendix B showed a wider area of land as being safeguarded as replicated below. Although DWS has concerns (as expressed elsewhere in this submission and their earlier representations and Hearing Statements) in relation to the prospect of a Station being provided in some of the land proposed to be safeguarded at this stage, the broad principle of a flexible approach was sound.



The Publication Version of the LPP2 then sought to significantly reduce (and therefore removed the degree of flexibility) the area of land to be safeguarded at Grove in comparison to the earlier draft. Appendix B of the Publication Version showed the safeguarded land as follows:



Great Western Mainline Capacity

DWS contacted Network Rail as part of the work undertaken to inform the Vision Document for Tulwick Park. As set out at Section 4 of the TFA, NR confirmed that whilst it supports the principle of reopening stations along the Great Western Main Line (GWML) insufficient work has been undertaken to (i) quantify the impacts of this and (ii) confirm if these are acceptable or not.

Although it would appear that SLC Rail have not had similar discussions with NR, or the Train Operating Company who will also need to support the opening of any new station, we are comforted that there is a recognition that SLC acknowledge there are structural issues that will need to be overcome prior to any new stations being opened on the GWML. The following extracts from Section 3 of the SLC Rail report provide some useful context for the site assessment summary provided at Section 4 of the same.

“Being located on the Great Western Main Line (GWML) is, in this case (i.e. Grove), a major challenge [Turley emphasis] as much as an asset”

“[Increases in passenger and freight trains]...will eventually exceed the capability of the existing track and signalling, even without a new station [Turley emphasis], and drive the need for extra tracks to achieve and maintain a robust and reliable train service”.

“[Interim improvements, such as making better use of existing infrastructure]...will not deliver the change needed to meet future demand and eventually new infrastructure will need to be built [Turley emphasis]”

From a Grove perspective the evidence presented at Figure 3.2 of the SLC Rail report confirms that set out in the TFA; namely, the limiting factor for the opening of any new station along the GWML will be the ability to address the track capacity between Royal Wootton Bassett and Didcot Parkway. Similarly, there is an acceptance that the impact of opening a new station “will need to consider wider capacity issues on the railway, as a number of infrastructure interventions are likely to be required”.

Against this background DWS argues that VoWH should be safeguarding as much land as possible to ensure that the prospect of delivering a station within Grove is not adversely affected at a later date by issues that are unable to be overcome, including (but not limited to) land ownership constraints and any significant planning obstacles. It is therefore somewhat worrying that the VoWH has taken the decision to place a reliance upon just two sites, which the TFA has already concluded is likely to have an overall negative impact upon the business case for re-opening Grove station.

Whilst it is acknowledged that further detail has been provided within the SLC Rail report to justify the inclusion of the Bradfield (Site C) and Denchworth Road (Site F) sites, the evidence provided is far from convincing. Indeed, it is contradictory in places, which leads us to believe that the evidence base has been produced to justify the conclusions already reached. The following text outlines the reasons why we have formulated this view.

Site Selection Process

According to Section 5 of the SLC Rail report, a total of seven sites were considered when identifying the land that should be safeguarded to deliver Grove Railway Station. It is also apparent that the site selection process considered three topics; namely, ‘Connectivity’; ‘Land and Planning’; and, ‘Railway Infrastructure’. Whilst no details are provided as to how each of the assessment sites were rated, it is understood that a sliding scale of “0” (i.e. Very Poor) to “5” (i.e. Very High) has been used. A summary of the site assessments, which presumably relates to the 2nd July 2017 site visit referenced at page 24, is provided at Section 5.3.

Having cross-referenced the pro-forma that relates to the assessment of the site most closely linked to 'Tulwick Park' (i.e. Grove Park (South)) with those of the sites that from the safeguarded land identified in LPP2, it raises significant questions about the selection process. The following text highlights some of these anomalies/inaccuracies and includes an updated pro-forma that relates directly to Tulwick Park as perhaps the biggest flaw of the SLC Rail report is its failure to consider the full extent of the land that DWS controls and is willing to safeguard for use as a station, despite this information being available to the Council when the SLC were preparing their report. Not only does the DWS scheme safeguard land for a railway station, but would also facilitate the delivery of access infrastructure between the safeguarded land and the A338.

Connectivity

As no details have been provided with respect to how 'connectivity' has been assessed, it is very difficult to reach a conclusion about the audit that has been undertaken by SLC Rail. However, DWS broadly supports the conclusion that has been reached with respect to the Denchworth Road site on the basis that this site is peripherally located from the A338 and is reliant upon third parties to ensure suitable access can be delivered. As it stands, the support for this has not been confirmed, unlike the situation at Tulwick Park. Of particular note is the acceptance that:

- There is no direct link to the A338;
- There would be an unacceptable increase in demand for vehicles using Denchworth Bridge, which is a single lane carriageway that is subject to very poor forward visibility; and,
- The site is remote from existing bus services, with any new services requiring the support of local bus operators.

Whilst DWS considers that the conclusions reached with respect to the Denchworth Road site are broadly acceptable, we would like to reiterate our previous comments that any station at this location is reliant upon the delivery of sites where completion rates are highly questionable and infrastructure that is equally problematic to deliver in the next Plan period. Please refer to the Hearing Statements submitted on behalf of DWS in response to Matters 3, 6 and 8.

It is somewhat confusing how the Bradfield site has been adjudged to have a higher score (i.e. "5") than the Grove Park (South) site (i.e. "4"). For example, it is approximately 1 kilometre from the Williams Roundabout using the current infrastructure whereas the station land shown on the Tulwick Park masterplan is some 750 meters from the same point. The effects of this are compounded by the wider land control and planning issues that SLC Rail has identified with respect to the measures required to enhance accessibility over the GWML. These are considered in further detail below.

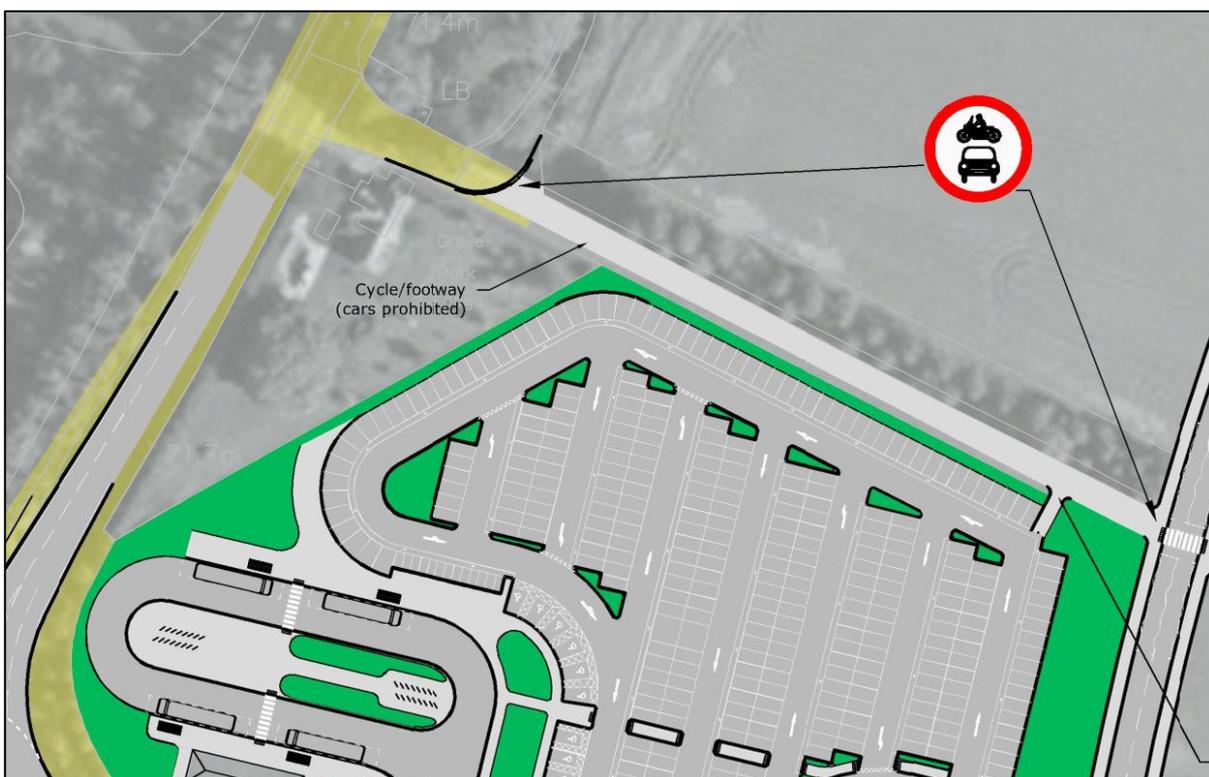
Similarly, it seems somewhat bizarre that a site can be awarded the highest score for connectivity when it is accepted that commercial buses are unlikely to consider the diversion of buses into the Bradfield site viable. This is in stark contrast to the public transport strategy that has been identified for Tulwick Park to date, which has been supported by the local bus operator (see enclosed Stagecoach letter at Appendix B). The suggestion that a station located to the east of the A338 would be reliant upon a speed limit change to accommodate bus stops is unfounded and should be duly disregarded.

In any case, the TFA included a plan showing how pedestrian crossings to the indicative masterplan for Tulwick Park can be enhanced without the need for any speed limit changes along with a wider pedestrian/cycle strategy that would also enable the delivery of the strategic cycle improvements that are referenced in LPP1. The relevant extracts of the TFA are enclosed at Appendix C for reference.

In light of the above, it is considered that the 'connectivity' score for the Grove Park (South) site should at least be equal to that assigned to the Bradfield site. We therefore consider that unless strong evidence to the contrary can be provided, the site assessment pro-forma for the Grove Park (South) site should duly be updated to refer to a 'connectivity' score of "5".

Land and Planning

DWS supports the overall conclusion that has been reached with respect to 'Land and Planning' credentials of the Grove Park (South) site as it corroborates the conclusions reached within the Tulwick Park Vision Document; namely, there is land located to the east of the A338 that is available now and has a real prospect of being able to deliver housing within five years. Of particular note from a transport perspective is the reference to the overall benefits associated with revising the Grove Park Drive junction, albeit should be noted that the Tulwick Park masterplan indicates that this would remain part of the public highway and would thus not be stopped up. The relevant extract from the emerging Access Strategy outlined in the TFA is provided below:



Grove Park Drive (Source: Motion Drawing 17034-114b, TFA Appendix G)

However, it should be noted that the disadvantages identified by SLC Rail should be disregarded as:

- A residential led mixed use development at Tulwick Park would ensure that any new station would be integrated within the built form of Grove. Indeed the TFA has shown how development at Tulwick Park can implement complementary infrastructure that would ensure that a station to the east of Station Road (the A338) is accessible by a range of modes of transport. The relevant extracts are provided for ease of reference at Appendix C.

- There would not be a need to acquire land for a station as DWS has confirmed it is willing to safeguard land that can be used to construct a station and the necessary supporting infrastructure. It is important to note that this could be provided anywhere along the site frontage as a masterplan for the site has not yet been fixed.
- There would not be a need to acquire land in order to deliver an access road to the A338 as DWS has shown in the Tulwick Park Vision Document that this would be incorporated into any development at this site in the future. The relevant extract from the Vision Document is provided below.



Tulwick Park Masterplan Extract

SLC Rail has awarded both the Bradfield and Denchworth Road sites a score of “4”. As noted above, in the absence of a detailed overview of the methodology that has been followed by SLC Rail it is difficult to critique these scores in detail. However, there are aspects of the respective site pro-formas that bring the conclusions reached by SLC Rail into question. For example:

- The Bradfield site is not well located to existing and planned development areas, as without a bridge over the GWML access by non-car modes would require people to walk along the A338. As noted above, the indicative station layout contained within the SLC Rail report is almost 1 kilometre from the existing Williams Roundabout using current infrastructure.
- Similarly, it is noteworthy that SLC Rail suggests further development would be required to support the Bradfield site. We note that Grove is a settlement located to the south of the railway line whereas this proposition would result in the northern boundary of the Grove built up area (i.e. the GWML) being breached
- SLC Rail acknowledges that there are likely to be planning (i.e. visual impact) and legal matters (i.e. the use of land owned by F1 Williams) in order to provide a pedestrian/cycle bridge.

- SLC Rail acknowledges that the location of these sites in relation to the A338 is such that they are unlikely to facilitate a viable rail-bus interchange.
- There is reference to land acquisition being required to deliver the Bradfield and Denchworth Road sites. In the absence of any clarity with respect to this being delivered, there can be no guarantee that a station can indeed be provided at these locations.
- SLC Rail notes that there may be a need to use land controlled by F1 Williams to provide a **“safety compliant platform width”** [Turley emphasis]

In light of the above, it is considered that the ‘Land and Planning’ scores associated with the Bradfield and Denchworth Road sites have been over inflated. Given the uncertainty that exists with respect to land control, it is not considered unreasonable to assume that these sites should be assigned a score of “0” as it has not been confirmed that these sites are suitably located and/or have a reasonable prospect that they will be available over the course of the Plan Period.

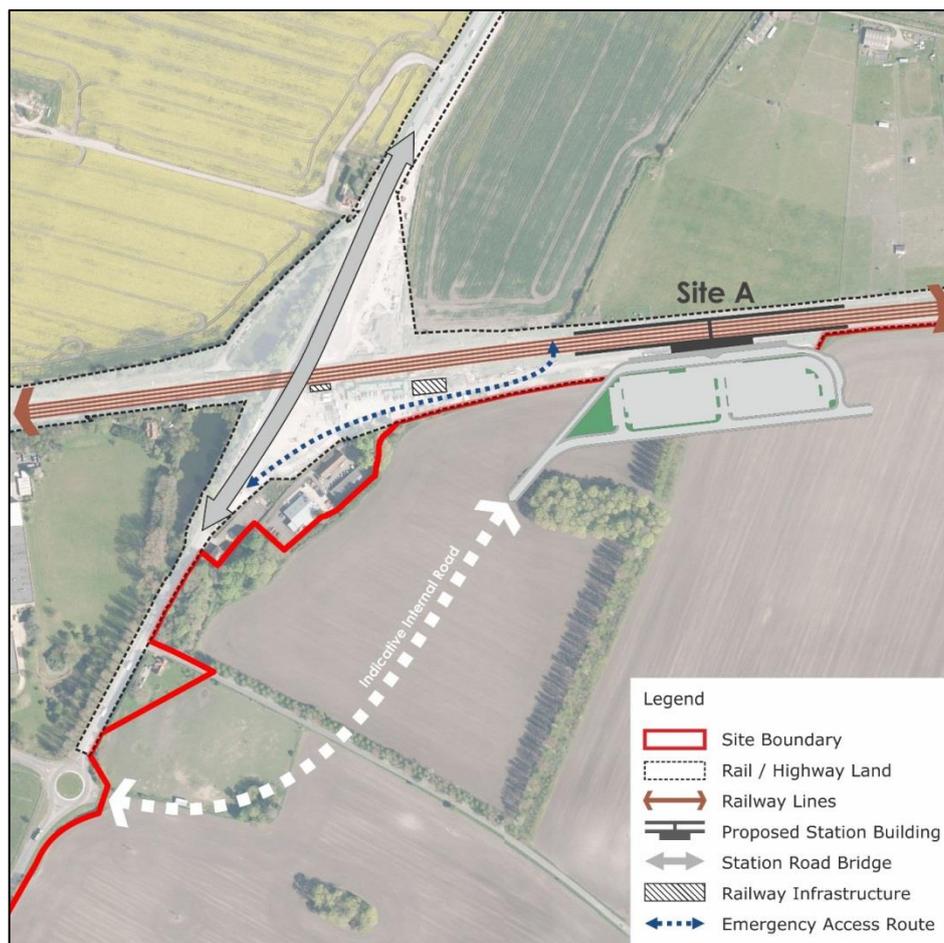
Rail Infrastructure

From a rail infrastructure perspective the Denchworth Road site has been awarded a score of “5” on account of it being located on a straight section of track that already comprises four tracks and that sufficient space is provided to provide necessary station infrastructure. On this point, it should be noted that the platforms indicatively shown at this location extend to some 250 metres, as the Tulwick Park site has a site frontage that is in excess of 500 metres. Reference is made to the need to the need to modify masts and gantries associated with electrification of the GWM as a disadvantage, together with the proximity of the station to Grove Level Crossing.

Presumably the fact that the Denchworth Road site has been awarded a score of “5” reflects the view of SLC Rail that the costs associated with amending existing infrastructure and/or the closure of Grove Level Crossing could reasonably be absorbed into the capital expenditure with bringing the site forward and/or the works that will be required to increase the capacity of the line more generally between Royal Wootton Bassett and Didcot Parkway. If this is the case then DWS considers that the conclusions reached with respect to this area of land are reasonable, notwithstanding the aforementioned issues raised with respect to the ‘connectivity’ and ‘land and planning’ aspects of this site.

However, the same cannot be said for the Bradfield site, which has been awarded a score of “3”. As was clearly stated at the Matter 6 Hearing, F1 Williams would strongly object to the use of any of its land for the station, a fact which we understand is re-iterated in representations that are being made on behalf of F1 Williams by Strutt & Parker. For this reason alone, SLC Rail should have concluded that a station at this location would not be deliverable in the absence of a formal agreement with a third party. Accordingly, this site should have been awarded a score of “0”.

This conclusion would seem entirely reasonable given that the Grove Park (South) site was awarded such a score on the basis that the location considered by SLC Rail would be extremely challenging from a rail operational perspective. Whilst it is accepted that the location of the Grove Park (South) site considered by SLC Rail to date would have an adverse effect upon the current emergency access point to the track and require the relocation of an ‘overhead line autotransformer feeder’, SLC Rail has failed to acknowledge that there is a substantial area of land located to the east of the site that it has assessed that could be used for a station. An indicative sketch, which draws upon the evidence contained within the SLC Rail report, is provided below for reference.



Tulwick Park Station

Notwithstanding the above, the biggest failing of the SLC Rail assessment is that it does not acknowledge that the works required to deliver Grove Station, and others along the line such as at Royal Wootton Bassett, will be reliant upon the delivery of additional track capacity and/or signalling equipment whichever station location is chosen. In this regard, the problems that have been identified with respect to track layout and the need to move the 'overhead line autotransformer feeder' are likely to need to be addressed in any case to increase the capacity of this nationally important section of track.

DWS therefore reiterates the view outlined in the TFA; namely, there is an over emphasis placed upon providing a station in locations that already benefit from four tracks. It is also considered reasonable to assume that any costs associated with opening a station anywhere along the GWML could be absorbed into such a project. Accordingly they are not a justifiable reason for the sites located to the east of the A338 being awarded a score of "0". Should the VoWH take a different view, then the same must surely apply to all of the sites assessed in the SLC Rail report as they will all equally be reliant upon the conversion of the GWML from two tracks to four between Royal Wootton Bassett and Didcot Parkway, as well as any complementary signalling upgrades that may be required.

In light of the above, it is considered reasonable to assume that the score assigned to Grove Park (South) should at least be consistent with that awarded to the Bradfield site. We therefore consider that unless strong evidence to the contrary can be provided, the site assessment pro-forma for the Grove Park (South) site should duly be updated to refer to a 'Rail Infrastructure' score of "3".

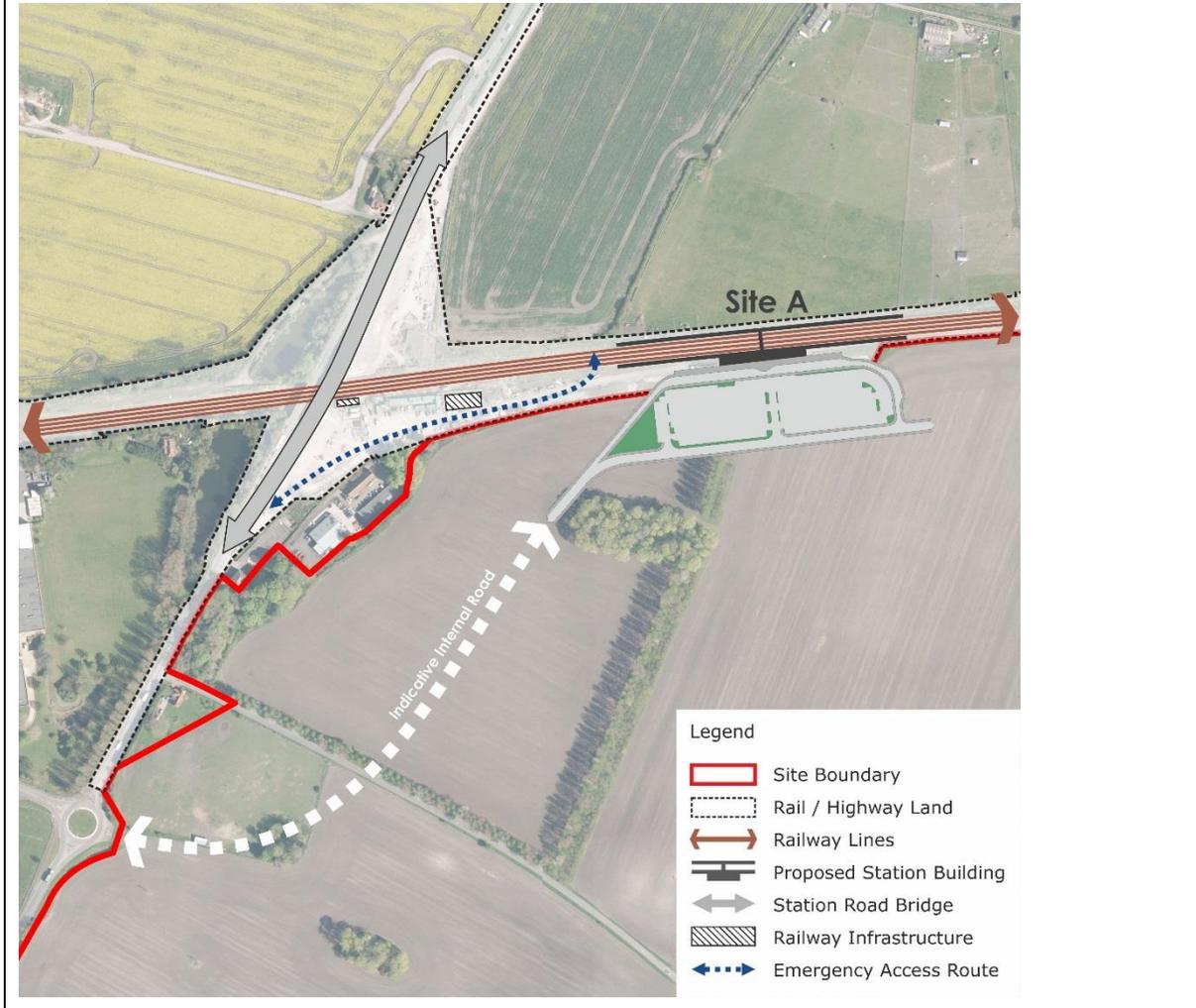
Tulwick Park Site Appraisal

Having regard to the above, it is considered that the overall score for the Tulwick Park site should be increased from 9 to 13 making it the site with the highest score using the SLC Rail methodology even before adjustments are made to the 'Connectivity' and 'Land Use and Planning' scores awarded to the Bradfield and Denchworth Road sites. A 'Tulwick Park' Site Pro-Forma, which draws upon that prepared for the Grove Park (South) site, is accordingly provided below as follows:

Connectivity		Score: 5
Advantages	<ul style="list-style-type: none"> A338 makes the site easily accessible from the road network from the north; east; and, south, increasing its catchment area. Stagecoach has confirmed that Tulwick Park is located at the point where all existing (and planned) routes will converge and thus will benefit from access to the fullest range of bus services. Pedestrian/cycle crossings can be provided on the A338 to ensure existing and future residents of north Grove are able to access the site safely. A shared footway/cycle path can be provided along the eastern edge of the A338 to ensure that the station is accessible from the south and west. 	
Disadvantages	<ul style="list-style-type: none"> Access by road from the west is less direct and could involve a detour through villages, but not to the same extent as the Denchworth Road site which by SLC Rail's own admission will encourage vehicles to use Denchworth Road. There is no segregated cycle track or footpath along the A338 North of the site, but the lack of existing and/or planned housing/employment land to the north means there will be little demand for such a facility. 	
Land and Planning		Score: 5
Advantages	<ul style="list-style-type: none"> Relatively undeveloped site with space for reasonable parking facilities that could be decked as required. Potential to secure significant improvement to the operation of the A338 through the diversion of Grove Park Drive. 	
Disadvantages	<ul style="list-style-type: none"> None 	
Railway Infrastructure		Score: 3
Advantages	<ul style="list-style-type: none"> Straight track geometry, which would not preclude the extension of the current section of four tracks further east as part of a wider capacity enhancement of the GWML. Adequate space for station building and associated infrastructure. No need for land acquisition to deliver the station, as land is being offered for safeguarding by DWS. No need for land acquisition for access, as this will be incorporated into the Tulwick Park masterplan and delivered by DWS. 	
Disadvantages	<ul style="list-style-type: none"> There are masts and gantries associated with electrification; although this could be undertaken in conjunction with the wider capacity enhancement of the GWML. An overhead line autotransformer feeder is located to the west of the site. If required, any costs associated with relocating this to accommodate four tracks to the east of the A338 could be absorbed within the costs associated with the wider capacity enhancement of the GWML. Pedestrian/cycle crossings can be provided on the A338 to ensure existing and future residents of north Grove are able to access the site safely. 	
Tulwick Park Site Summary		Total Score: 13
<p>The Tulwick Park site benefits from excellent access to the existing highway and public transport networks, and thus is ideally located to maximise the potential for inter-urban trips currently undertaken by car to be captured at source. It has also been shown that there is the potential for this site to be made accessible on both foot and by cycle.</p> <p>There are potential challenges associated with existing rail infrastructure. However, there is the potential for costs associated with diverting and/or modifying this to be absorbed within the costs associated with the wider</p>		

capacity enhancement of the GWML, which will be the trigger point for the re-opening of Grove Station irrespective of where it is provided.

For these reasons, it is clear that the VoWH were correct to safeguard land to the east of the A338, and should therefore be re-instated in general accordance with the following sketch.



Summary

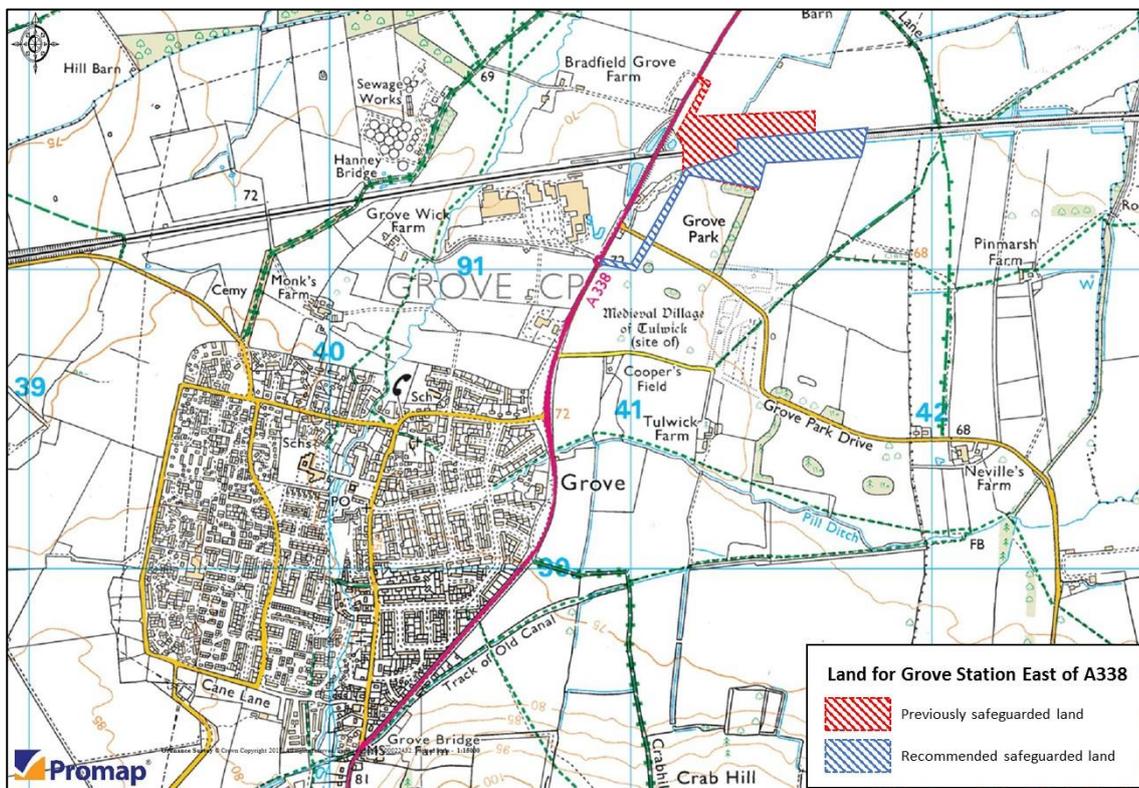
Whilst there are aspects of the SLC Rail report that DWS supports, principally the acceptance that any new station on the GWML is incumbent on the delivery of wider capacity enhancements, it is clear that there are still significant questions associated with the site selection process that has been followed. DWS therefore remains concerned that the conclusion to exclude previously safeguarded land located to the east of the A338 is unsound and contrary to the objectives outlined at paragraphs 5.90 to 5.93 of the LPP1.

It is clear that the inclusion of these sites at the expense of Tulwick Park severely restricts the ability of a station at Grove from ever being realised. We therefore strongly recommend that the decision to remove the previously safeguarded land to the east of the A338 be reinstated to reflect the fact that it:

- Is controlled by a single landowner and is thus available and deliverable.
- Can be accessed directly from the A338 via the creation of a fourth arm off the existing F1 Williams Roundabout, through land which is controlled by DWS.
- Is surrounded by a range of uses that will increase the overall viability of a station as it will cater for both 'outbound' and 'inbound' commuter trips, including those that are currently associated with the F1 Williams Centre.
- Could be supported by a Park and Ride station, which will ensure that the station is readily accessible by a range of transport modes.

The fundamental issue of soundness is that the LPP2 must be effective and therefore deliverable (Archived NPPF, 182). If it transpires that the reopened station cannot be accommodated on the reduced safeguarded land shown in LPP2 then this will critically affect the deliverability of the project and therefore a key local transport aspiration. It is therefore essential that the LPP2 safeguards sufficient suitable land which has the flexibility to accommodate the reopened station.

DWS therefore strongly recommends that the safeguarded land plan is amended to include the land shown on the following plan, which also shows the land previously identified to the east of the A338 by the VoWH for context:



We trust that this submission provides sufficient information in order for this matter to be considered.

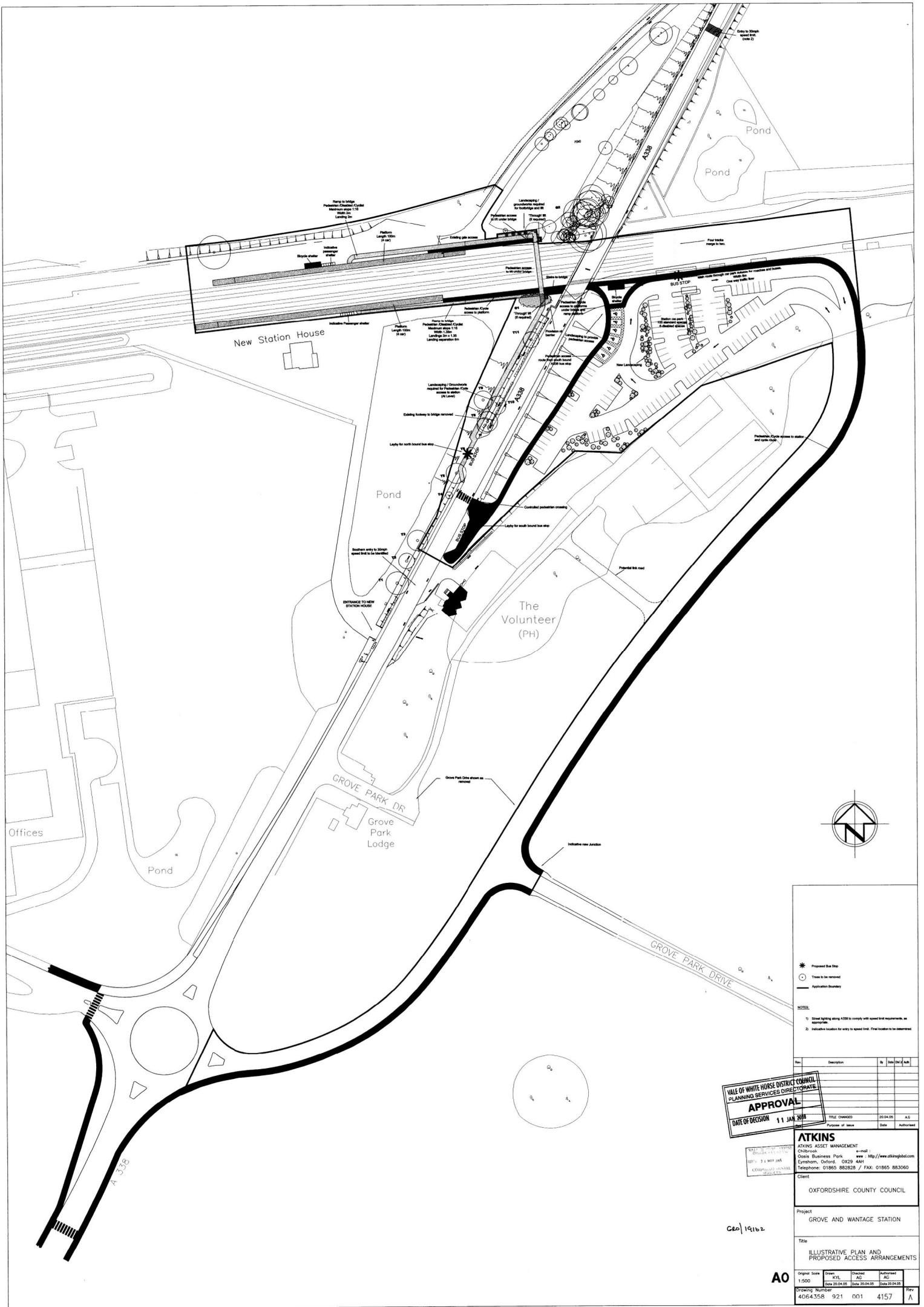
Yours sincerely

A handwritten signature in blue ink, appearing to read 'David Murray-Cox', written in a cursive style.

David Murray-Cox
Associate Director

david.murray-cox@turley.co.uk

Appendix A: Layout of Grove Railway Station approved by VoWH Ref: P05/V0738/O



- NOTES:**
- 1) Speed lighting along A309 to comply with speed limit requirements, as appropriate.
 - 2) Inductive location for entry to speed limit. Final location to be determined.

No.	Description	By	Date	Authorised

VALE OF WHITE HORSE DISTRICT COUNCIL
PLANNING SERVICES DIRECTORATE
APPROVAL
DATE OF DECISION 11 JAN 2008

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 ATKINS ASSET MANAGEMENT
 Oxfordside
 Oasis Business Park www. <http://www.atkinsglobal.com>
 Syston, Oxford, OX29 4AU
 Telephone: 01865 862828 / FAX: 01865 883060
 Client
 OXFORDSHIRE COUNTY COUNCIL

Project
 GROVE AND WANTAGE STATION

Title
 ILLUSTRATIVE PLAN AND PROPOSED ACCESS ARRANGEMENTS

Original Size	Date	Drawn	Checked	Authorised
1:500				

A0

Drawing Number	Rev
4064358 921 001 4157	A

G20/19162

Appendix B: Stagecoach Letter

10th November 2017

Ian Blair
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Dear Ian

Land East of the A338, Grove, Oxfordshire

I am very pleased to confirm Stagecoach in Oxfordshire's strong support for the principle of the promotion of this land for a residentially led mixed-use development, and in particular to commend the emergent proposals to provide a local Park and Change facility offering up to 400 spaces at this site. We set out the basis for our interest below.

Successive Local Plan-making rounds, over several decades, have led to incremental additions being committed to the edge of Wantage and Grove, mainly to the west of the Letcombe Brook. The brook is itself a major feature within the urban structure of both settlements, creating a strong physical barrier, oriented north-south: a "fracture line", with very limited permeability across it. The main public transport corridor has historically run up the A338, then up Main Street Grove, serving well those parts of both settlements east of the Letcombe Brook, but much less so the more recent expansion to the west.

We have recently sought to remedy this situation by diverting our long-standing service S8 (formerly 31) to operate via Mably Way, Denchworth Road and Brereton Drive. This provides an hourly service directly linking these areas to both Abingdon and Oxford, as well as Wantage Market Place. However, in so doing we have had to split a consistent route within the town reducing effective frequency. Experience shows very well that in general, the public responds most positively to a consistent, simple and direct route, so long as this is reasonably conveniently accessible by foot, or, in inter-urban contexts, perhaps by cycle.

Despite this, we see little alternative in the context of Wantage and Grove, to a future scenario where multiple services need to be developed in future, each serving different neighbourhoods off-line of the main corridor, west of Letcombe Brook. This will be particularly the case when development at Grove Airfield and at Monks Farm takes place as anticipated by the adopted Part 1 Local Plan. Both sites lie well beyond 400m even of the new S8 route along Brereton Drive, and well over 1000m west of the main S9 service, which we expect to remain the most direct service. Nor is it at all clear when streets suitable to accommodate a new bus route will be made available to conveniently serve either strategic site. We note that a connection though from the Airfield to

Denchworth Road, and potentially through Monks Farm, is not required until the 1500th occupation. This may be over a decade away.

As development is brought forward in the relatively near future at both Grove Airfield Monks Farm and at Crab Hill, this will lead to most new homes being sited a quite considerable distance from the main bus routes to Oxford, in particular service S9 (formerly X30) that takes the most direct route via Cumnor and Botley to Oxford Station and the City Centre. While developer funding has been sought and agreed to help “pump prime” service development associated with both schemes, it remains the case that even the most optimistic scenarios do not envisage most of the developments benefiting from anything more than a core daytime 30-minute frequency. While this is certainly adequate as a mode choice, especially for longer-distance inter-urban services, this is not a level that would encourage mode shift to buses to the extent that is both highly desirable, and indeed necessary, if major negative impacts of development-related traffic are to be avoided on both the local and wider network.

We are quite concerned that in practice, without specific interventions to make higher bus frequencies available much more conveniently to residents of Wantage and Grove than existing or potential Park and Rides near Oxford, development is likely to be a great deal more car-dependent than it is today, and generate significant unmitigated pressures on the local highways network.

To the east of Wantage, funding from central government and recent and committed developments has already been applied to addressing junction capacity issues at Rowstock, Steventon, Milton Interchange and elsewhere, to mitigate current capacity pressures and to create the capacity to accommodate the Local Plan’s development strategy. However, on the A338 north of Grove, the current highway is blighted with bottlenecks and safety issues around East Hanney, Venn Mill, and Frilford; and to a lesser extent at the A420 junction near Besselsleigh; for which mitigation is much less obviously either deliverable, or committed.

Further north east towards Oxford, the County Council’s Oxford Transport Strategy has at its centre the need to reduce pressure from development relate growth on the Oxford Ring Road and its approaches. To that end, a series of new Park and Ride sites is identified further out of Oxford than the current provision, including one south of the A420 at Cumnor.

While Stagecoach agrees that the Outer P+R strategy has much to merit it, we have made it plain that such sites are highly unlikely to sustain dedicated bus services. Rather, they will need to depend on passing inter-urban bus routes, to a very great extent. These already come close to offering comparable frequencies to the current dedicated P+R services on key corridors, and these can reasonably be expected to increase in frequency if buses begin to achieve and develop a good mode share from the growth planned within the settlements they serve. As such, to be effective, any outer P+R needs to be sited and designed in such a way that passing buses can easily and quickly divert in and out in both directions with minimal delay to through passengers. It is far from clear to Stagecoach that sites available to the Council at Cumnor for such provision could ever realistically facilitate this, all being south of the A420 by some distance. Junction arrangements at the Cumnor Interchange are also unusually complex, and unfortunately do not at all lend themselves to buses, either eastbound or westbound, making quick diversions to serve it. We also note that the potential

sites are all within the Green Belt, and while this is far from an insurmountable problem, it certainly adds a further level of complexity in site identification and delivery.

Stagecoach has been consistent in suggesting that it makes at least as much sense, to seek to intercept travellers as near as possible to their point of trip origin. We have made such representations to Oxfordshire County Council as it prepared its current local Transport Plan, "Connecting Oxfordshire". Ideally bus services achieving this end would be available within their neighbourhood, by providing a high-frequency direct service: ideally operating at least every 20 minutes, and more often at peak times. However, as discussed above, given the existing and future urban structure, this is highly unlikely to be deliverable at any stage to any of the strategic developments planned for either Wantage or Grove, at Crab Hill, Stockham Farm, or Grove Airfield.

This being the case, creating a means to allow residents to conveniently take advantage of all the services operating along the A338, at the first practical point that the routes converge onto a single corridor just north of Grove, has the benefit of offering the fullest range of bus services to residents of both existing or new development, wherever they reside. In providing the highest frequency to multiple destinations, it allows any bus to be used. The relative attractiveness of using the bus is thus maximised, making mode shift that much more likely to be achieved. Flows are consolidated onto high-capacity vehicles well before they reach the constrained junctions and stretches of the A338, much less more congested routes closer in to Oxford.

It makes sense to assume that at least 4 buses per hour to Oxford will be available from stops north of Grove at peak hours in the foreseeable future, and in time, this frequency is likely to rise further to a level that is competitive with existing Park and Ride services at Seacourt in particular. Overall journey times by bus are likely to be competitive with driving to existing Park and Ride sites, as the S9 route in particular very closely approximates to the logical driving route while also benefiting from comprehensive bus priority east of Eynsham Road, Botley.

It is Stagecoach's view that the proposed Park and Ride site east of the A338 at Grove probably represents the ideal location to site such a facility. As well as being easily and directly served by all our services to Oxford and Abingdon, it will be able to take advantage of all service improvements delivered on either corridor into the future, as well as helping to catalyse patronage growth, helping to support further enhancements in its own right. It is within direct and easy reach by walking or cycling not just of the proposed residential development, but also that committed immediately to the west of the A338, including ongoing and future phases at Monks Farm. We also note, and applaud, the vision to co-locate key local facilities in the immediate vicinity, including convenience retail and a primary school. This makes it possible to combine regular local journeys for day-to-day essential needs with onward bus journeys towards destinations to the north and east. We see that the site could also potentially host other functions, such as "click and collect", or early year nursery provision, or a private gym. Conjoining these functions also makes it possible to envisage that the ongoing stewardship and maintenance of the facility can be covered without any burden on the public purse, while allowing parking to be free of charge. This will greatly assist in the overall success of the provision.

Finally it is important to recognise that such a facility would also represent an attractive and effective means to facilitate car-sharing, for other journeys to destinations for which public transport can never offer a practical or economic proposition.

Stagecoach confirms that it has been in close dialogue with your client team to optimise the scope, location and design of the facility. We believe that the emergent design offers the best possible scope to achieve the outcomes sought, in terms of usage and passenger generation, at low operating and site maintenance costs. The site can be delivered relatively quickly and easily, at an early stage, and therefore contribute to a short-term reduction in traffic pressures arising on the A338 north of Grove.

Stagecoach believes that the development site, and the P+R facility very clearly represents a singularly important opportunity to support the fullest possible use being made of public transport from Wantage and Grove as a whole, not only from the residential development proposed, but from the existing and future population of the area, including a wider rural hinterland. The proposals should be very favourably considered as representing a pattern of growth that delivers the highest possible share of sustainable travel modes for local and regular longer-distance journeys in accordance with NPPF paragraph 17 and 29. The associated damping of demand for single occupancy car use at peak allows this proposal to cost-effectively limit the transport impacts of the wider development strategy already committed through the Vale of White Horse Local Plan Part 1, which is entirely in conformity with NPPF paragraph 35. Finally we note that this proposal also entirely accords with the wider spatial strategy already tested and found sound in the Part 1 Local Plan, which seeks to try to focus development at or near the largest and most sustainable settlements, and additionally to take advantage of current and proposed transport infrastructure. This includes a potential site for a Grove Railway Station adjoining the site to the north.

In concluding, we would point out that the proposed development is able to take advantage of the highest levels of bus service available today in the area, and envisaged in future. The promotion will, in addition, provide a major element of infrastructure, that cannot readily or appropriately be accommodated elsewhere, that further mitigates the highways impacts both of the proposals themselves, and the wider committed development strategy for the Vale of White Horse.

Stagecoach in Oxfordshire therefore commends these proposals, and is happy to lend its strongest support to them.

I trust that the foregoing is sufficiently clear. Nevertheless, do not hesitate to contact me to discuss further any matter arising. I am, on behalf of Stagecoach in Oxfordshire

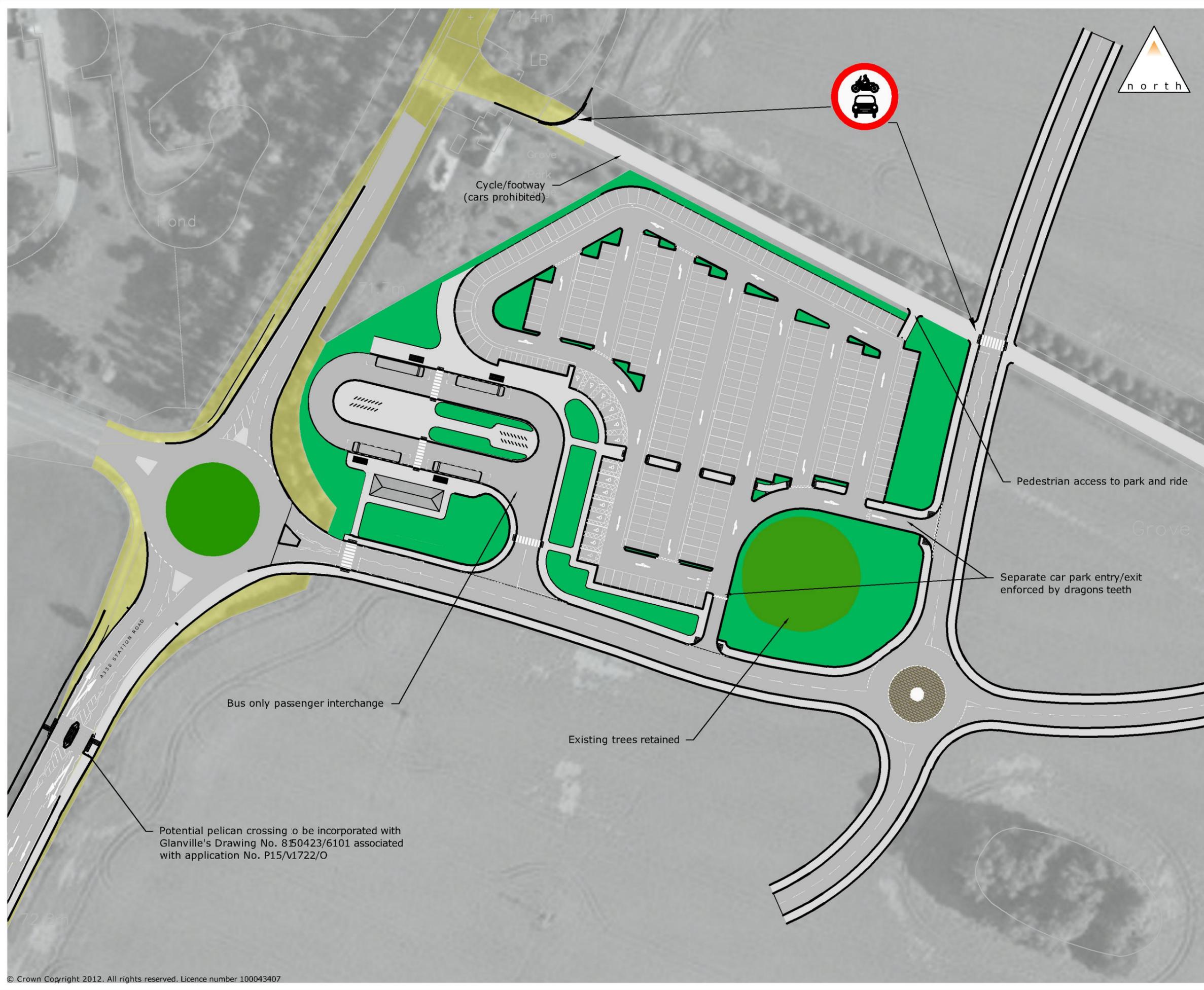
Yours sincerely



 Nick Small

Head of Strategic Development and the Built Environment (South)

Appendix C: Extracts from the TFA



Parking Provision:

- Car - 355 spaces
- Disabled - 14 spaces
- Motorcycle - 13 spaces
- Cycle - 32 spaces



* Cycle/footway example image

Legend:

- Highway Boundary



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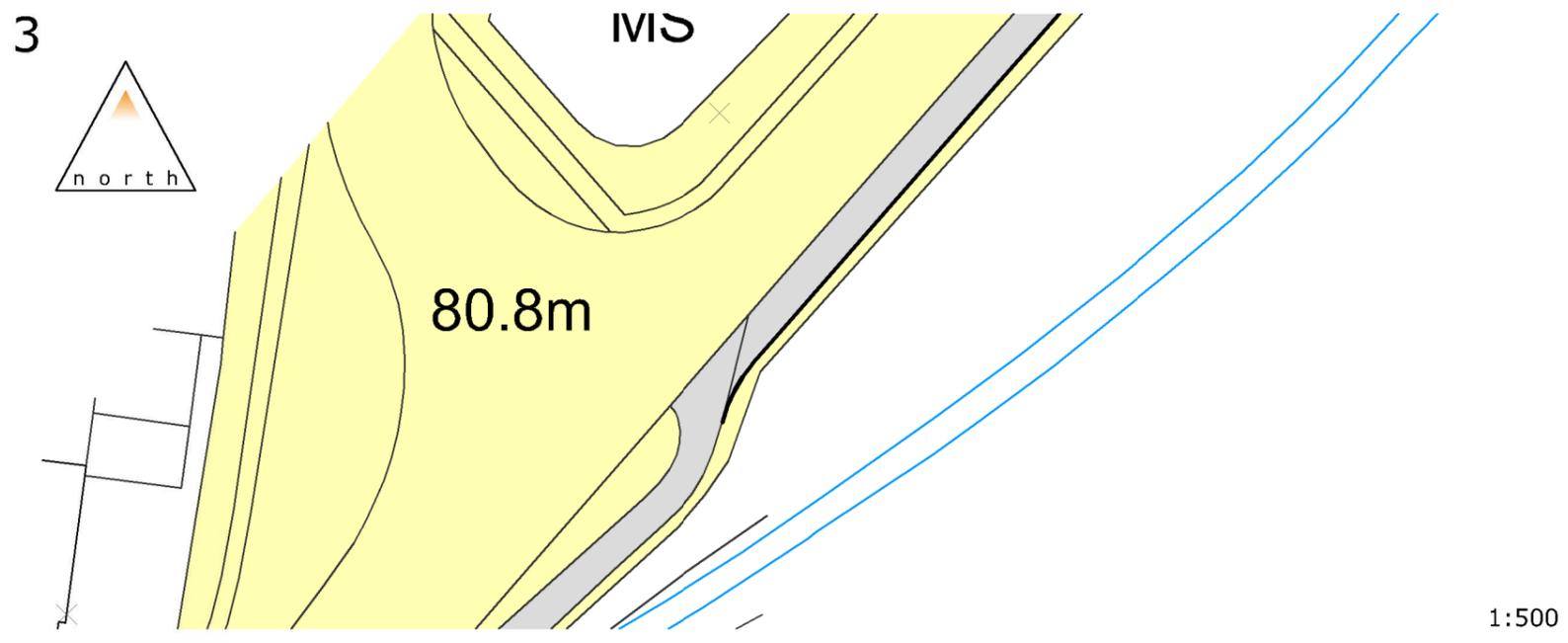
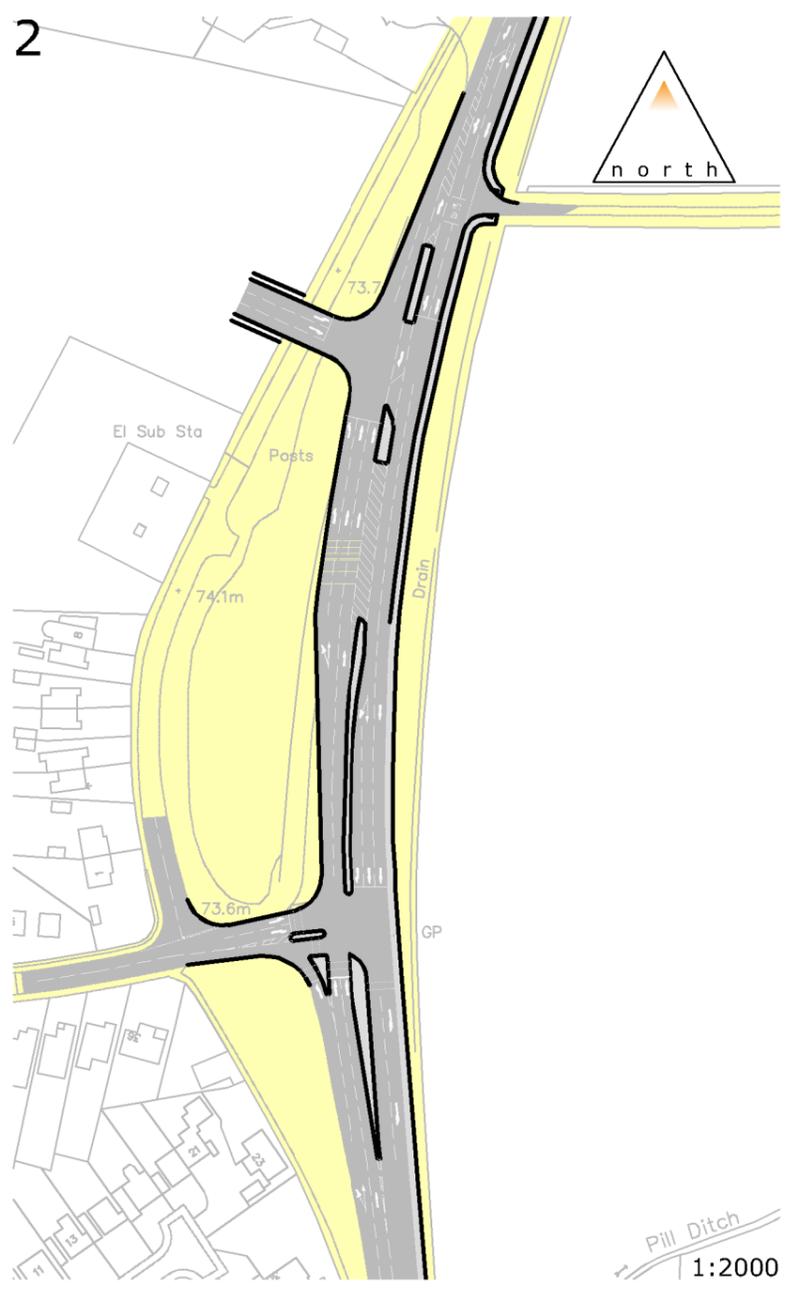
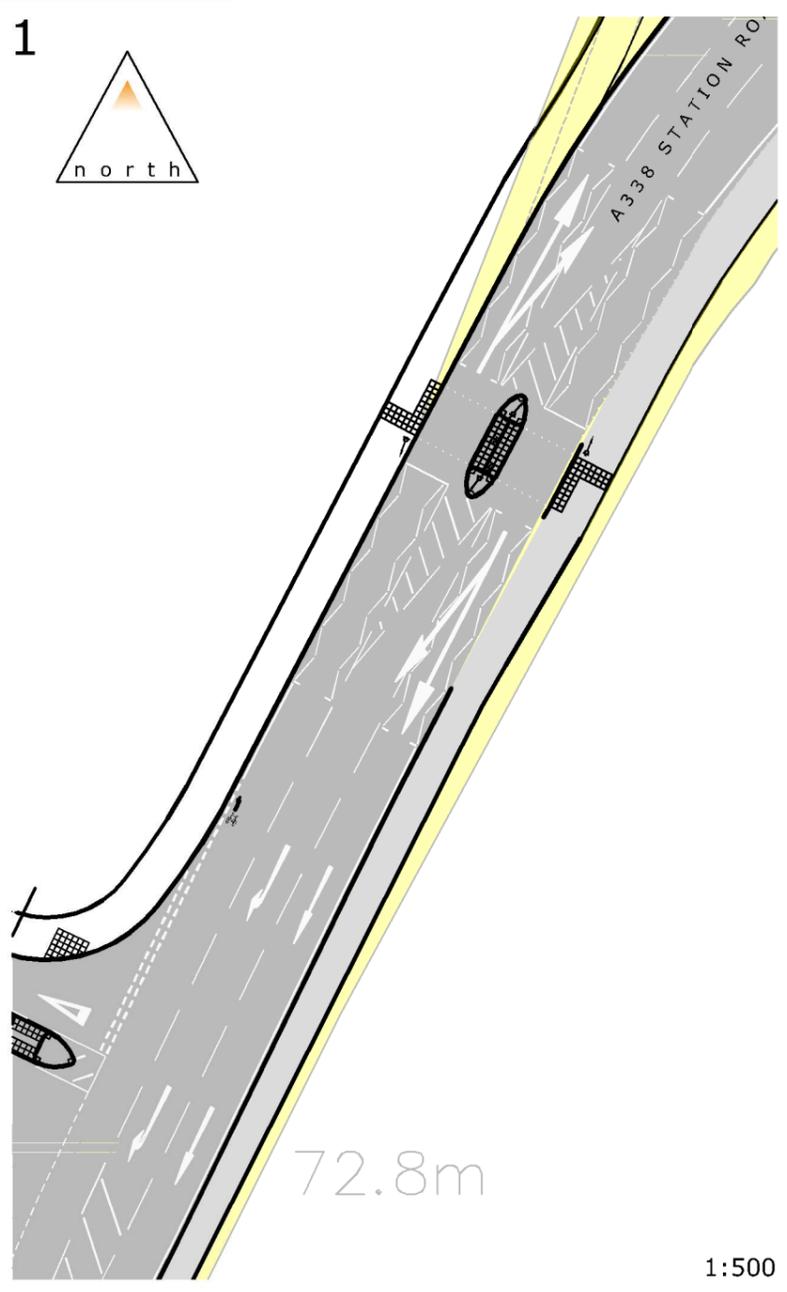
Project:
Tulwick Park, Grove

Title:
**Park and Ride
 Indicative Layout**

Scale: 1:1000 (@ A3)

Drawing: **17034-114** Revision: **B**

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- Legend:**
- Highway Boundary
- 1 - Potential pelican crossing to be incorporated with Glanvilles Drawing No. 8150423/6101
 - 2 - Layout consistent with SBA drawing A056867_A_03 and Brookbanks drawing 10045-HL-13
 - 3 - Ties into existing cycle/footway



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Project:
 Tulwick Park, Grove

Title:
 A338 Cycle Improvements

Scale: N/A (@ A3)

Drawing:
17034-115

Revision:
 -

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