Vale of White Horse Local Plan 2031 Part 2 Schedule of Proposed Draft Main Modifications

Page 3: Part A - contact details

Q1. Are you responding as an:	
Individual	

Page 4: Individual contact details

Q2. Due to statutory planning regulations, a name and means of contact is required for your representation to be considered:		
Title	Mr	
Name	Lee Church	
Business / Organisation name (if relevant)	-	
Job title (if relevant)	-	
Address line 1		
Address line 2		
Address line 3	-	
Postal town		
Postcode		
Telephone number	-	
Email address		

Page 5: Agent contact details

Q3. Due to statutory planning regulations, a name and means of contact is required for your representation to be considered. As you are acting on behalf of another organisation, you need to provide their details in the first box but your company name and contact details thereafter.

No Response

Page 6: Business / organisation contact details

Q4. Due to statutory planning regulations, a name and means of contact is required for your representation to be considered:

No Response

Page 7: Part B - your comments

Please provide the relevant modification number or document to which your comment relates. The list of documents are below: • Schedule of Proposed Draft Main Modifications • Schedule of Draft Maps and Figures • Sustainability Appraisal Report Addendum • Habitats Regulations Assessment Statement re Proposed Draft Main Modifications • Additional Air Quality Evidence • Additional Transport Evidence Proposed Modification Number / Document:

Additional Transport Evidence and subsequent Air Quality Evidence

Q5. Please provide your comments below:

As a resident on the 'Faringdon Road East' I am deeply saddened and concerned that the road is now being proposed as a main development site access. Previous transport reports suggested that the Faringdon Road east could be reopened for pedestrian and cycle access, but in the new Glanville report the proposal is to now make this road a primary vehicle access. If Oxfordshire County Council and Glanville had consulted with the residents on the road beforehand, we could have provided useful information to help prepare a more accurate transport delivery report. The new document contains errors that make the results and conclusions of the report invalid and therefore it does not accurately provide 'more detailed evidence of estimated traffic generation, trip distribution and identification of highway infrastructure, improvement or mitigations measures' as requested by the Inspector. My belief is that the report has been prepared as 'lip service' to the inspectors request without serious consideration for the impact on the village of Shippon. This also impacts in the subsequent Air Quality Report which has been prepared based on the flawed data in the Transport Delivery Report.

The report by Glanville is based on unjust, invalid and incorrect data and has created a false assumption that Faringdon Road East is fit for use as a site entrance. The errors in the document is summarised as follows:

- The TRICS data does not consider the fact that Shippon is used as a through route to access one of the three schools on the Faringdon Road. It also doesn't consider that the catchment primary school is Carswell Primary School, requiring a commute from Shippon along the Faringdon Road, Spring Road and Ock Street. Faringdon Road is therefore the primary road for educational commuting and a main route out of the new development.
- The adjustment of census data to reduce vehicle movements into Abingdon is flawed because of this educational commuting requirement. School travel is not considered in the document.
- The survey data from January 2018 is incorrect. Firstly, 323 vehicle movements are 'lost' in Shippon between the MoD site entrance on Barrow Road and the Barrow Road/ Faringdon Road junction, which is clearly incorrect. There are also 0 vehicle movements recorded at the Faringdon Road/Cholswell Road junction. This again is blatantly incorrect as my family commute to Carswell School every morning along this junction and (as previous surveys have demonstrated) vehicles cut along Elm Tree Walk on to Faringdon Road when traffic backs up on Barrow Road. This has been recorded on March 6th 2019 at 8:12am (see video link https://www.youtube.com/watch?v=xwGH33V2FRk or type 'Elm Tree Walk' into YouTube). This inaccuracy brings the entire validity of the report and subsequent air quality report (which is based on Glanville data) into question.

A more detailed review is provided below which highlights every section of the report where information is incorrect, false or has changed without justification:

- 2.1 There is no justification for changing the vehicular access from Sycamore Close to Faringdon road East.
- 3.0 TRICS data does not account for through traffic to the 2 private schools and secondary school on the Faringdon Road along the only route into Abingdon. Documentation suggests that an 'education provision' will be provided in the new development, but does not confirm if this will be a primary school. If a primary school is not built in the development, Carswell School is the catchment school and traffic will be funnelled along Faringdon road. This bottleneck brings the validity of the data into question.
- 4.5 Census data for Dalton Barracks and Shippon has not been considered in distribution assessment based on the 'bias of military personnel living and working in the same area'. The

removal of all existing Barracks traffic in the Glanville report may be an incorrect assumption, as a proportion of this barracks traffic will be associated with military personnel dropping children off at school before driving to work on the Barracks. My son goes to Carswell School which is the catchment primary school for Shippon. At drop off/ collection there are several parents wearing military overalls. My son is classmates with two children who live near Cherry Tree drive and their parents drive them to school and back every day before working on the Barracks.

Considering these military personnel live in houses that will remain occupied after the MoD leave and are not considered in the additional 1200 house allocation, it seems unreasonable to remove all existing barracks traffic from the data. Other Military movements of personnel are often via foot or cycle as they live so close to the barracks (and this data has not been recorded in the transport delivery report). Vehicle movements in military houses are therefore for non-military use by spouses and should therefore be included.

- 4.7 Assessment that 26% of vehicle movements into Abingdon is 'not considered reflective of a future development' is incorrect. Only 1 primary school is potentially planned for the new development. Therefore, commuting parents will still need to drive into Abingdon to take children to secondary school or nursery before onward travel. If a new primary school is not provided, all new educational commuting will be along Faringdon Road.
- 4.9 Adjustment of Census distribution destinations from 26% to 15% does not account for educational commutes as stated above. This is a significant reduction is based on the spurious assumption that 20,000 new jobs will be created in Didcot by 2031. Workers still need to take children to school in the mornings so their first commute will be into Abingdon along the Faringdon Road.
- 5.1 Key junctions for Site Access 1 and Site Access 2 are not listed. The report does not confirm whether these locations have been surveyed or if the data has been estimated
- 5.2 Surveys were undertaken in the month of January 2018, but does not provide a specific date of the survey. If the report was conducted out of school term time there will be a significant and effect on results, which will not provide a full understanding of existing traffic on the network.
- 5.4 The report does not provide the raw data for 'do nothing' and 'existing barracks traffic' been removed from the baseline. It does not confirm exactly how the barracks traffic has been removed from the baseline. As stated in 4.5 there are very few vehicle movements by military personnel directly to the barracks and this manipulation of data seems to be used to corrupt Site Access 2 data in the flow diagrams in Appendix E to justify the use of the Faringdon Road as site access. See the review of Appendix E for more information.

Table 12 Site Access 1 (Barrow Road/existing MoD entrance) and Site Access 2 (Faringdon Road/Cholswell Road Junction) data has not been included in the table. Surely this should have been included if the table is to provide a more detailed evidence of the estimated traffic generation as these locations.

- 5.7 Statement: 'It should be noted that this assessment makes no allowance for existing Barrow Road traffic diverting through the site at this stage' the through traffic will be diverted onto Site Access 2, increasing pressure on the Faringdon Road which has been inaccurately surveyed.
- 6.2 Only Honeybottom Lane/Wootton Road 'T' Junction will be operating within capacity. All other junction will be over capacity either AM or AM and PM. Again, Site Access 1 and Site Access 2 data has not been included.
- 6.4 Mitigation of Barrow Road/Faringdon road traffic needs to be added to the Site Access 2 traffic for Faringdon Road/Cholswell road and check if that is over capacity.
- 6.5 Marcham road corridor traffic mitigation requires southbound slip roads at Lodge Hill to be constructed to relieve traffic. This assumption does not consider additional vehicle movements along Dunmore Road to the interchange and the additional movements resulting from the new housing developments that are already in progress along the route to Lodge Hill.
- 6.6 Statement: 'Mitigation of the remaining junctions will be investigated in detail in preparation for the planning application' how can this report therefore conclude that there are no highways related reasons why the development cannot be adopted? Surely the mitigation of overcapacity junctions needs to be considered to satisfy the inspectors request and for a development to be adopted?
- 6.7 Statement: 'The work taken in this report has not identified any insurmountable engineering constraints with regard to the envisaged mitigation required' this report has been prepared on flawed data and does not accurately consider the existing vehicle movements along the Faringdon road/Cholswell road junction. There is also no understanding of the through traffic for educational

commuting so this statement needs to be reconsidered.

- 7.3 'The majority of the scheme of works has been agreed in principle with OCC'. No justification for changing the proposed Site Access 2 from Sycamore Close to Faringdon Road and there is a lack of understanding of the current road network, the site access routes need to be reconsidered.
- 8.4 Conclusion is based on flawed data and is incorrect TRICS does not account for Faringdon Road Educational commuting. Survey Data has incorrect assumptions for military movements as described in appendix E

APPENDIX E

6367 Rev B Only 1% of site vehicle movement is expected to leave along site access 2. This is flawed as educational commuting will require vehicle movements into Abingdon to the secondary schools and nurseries before onward travel to work.

Sheet 1 Flawed/incorrect data. Site Access 2 shows '0' vehicle movements leaving Faringdon Road onto Cholswell Road. At Site Access 1 there are 705 vehicles heading along Barrow Road, yet only (38 + 344) 382 vehicles reach the Barrow Road/Faringdon Road Junction 3. Therefore 323 vehicle movements end in Shippon? Not possible. As shown in the video evidence taken at 8:12 on March 6th 2019, (see video link https://www.youtube.com/watch?v=xwGH33V2FRk or type 'Elm Tree Walk' into YouTube), Barrow Road traffic often cuts through Elm Tree Walk on to Faringdon Road as traffic backs up on Barrow Road. This is educational commuting traffic and must be added to Site Access 2 data. My personal opinion is that data is being fudged to justify using the Faringdon Road as site entrance rather than carefully assessing the most suitable site access to meet capacity needs.

Sheet 2 Flawed/incorrect data again, as my wife collects my children from nursery/school in Abingdon and uses this junction between 17:00 and 18:00 every week! Either the military commuting adjustment is incorrect, or the survey was not accurate or conducted during school holidays. Some of the 32 missing vehicle movements between the Site Access1 and Barrow Road/Faringdon Road junction may be diverting to site Access 2.

Sheet 3 There are 2 issues: as stated above 705 vehicle movements predicted along Barrow Road at Site Access 1 yet only (38+348) 386 reach the Barrow Road/Faringdon Road Junction. The missing movements are not lost in Shippon but are diverted to Site Access 2 via Elm Tree Walk as seen in the video evidence. As the proposal is to divert Barrow Road traffic through the new development, it should therefore be assumed that all 705 vehicle movements along Barrow Road at Site Access 1 will instead enter the new development and will leave at Site Access 2. Add this to the 104 vehicles currently estimated to enter the site and the total movement into the site will be 809. Add the predicted new additional movements of (137+35) 172 leaving Site Access 2, then there are an estimated 981 vehicle movements along the Faringdon Road/Cholswell Road junction. It is appreciated that some movements will be lost in the new development, but based on this data the increase of vehicle movements along the Faringdon Road/Cholswell Road junction will be (981-382/382) approximately 156%. Considering the far east of Faringdon Road is a dead end, vehicle movements will change from 0 to 981, increasing the risk of harm to pedestrians and reducing air quality for residents.

Sheet 4 The 435 vehicle movements planned to continue along Barrow road at Site Entrance 1 will be diverted into the development at Site Access 1 and leave at Site Access 2. Add this to the (54 +14) 68 movements currently planned to leave at Site Access 2, the total movements will be 503. Assuming all 32 missing movements in sheet 2 leave at Site Access 2, the increase in vehicle movements will be (503-32/32) approximately 1,470%

APPENDIX G

6051 Plans for Barrow Road appear to be dangerous. Plan for pedestrian traffic to walk along a virtual footway 1.2m wide allowing 2.9m for 30mph vehicle traffic that could approach in both directions does not seem well planned.

Other Drawings: Proposed road widths reduce current verge space, affect lines of sight at junctions (Sycamore Close to Faringdon Road for example), affect existing drainage and may require removal of established trees along Faringdon Road East. Some residents park along Faringdon Road and this will be lost to advisory cycle lanes.

I have also reviewed the Air Quality Management Report and have the following comments:

Page 1 states that traffic distribution data has been provided by the Glanville. Due to previously stated concerns about the errors, validity and incorrect data usage in the Glanville Transport Delivery Report, it would therefore bring the validity of this Air Quality Report into question.

Air Quality Monitoring Locations focus on Abingdon town centre only, not Shippon.

The executive summary on Page 1 also states that 'Assessment of likely impacts of relevant LPP2 sites shows that only Dalton Barracks would require further consideration, in terms of the 500 AADT criteria, however the predicted AADT would in reality be split between several routes and so extremely unlikely to exceed the threshold for any individual route'.

As discussed before, educational commuting requires vehicle movements to be funnelled along the Faringdon Road an in to Abingdon, so the 'prediction' that Annual Average Daily Traffic (AADT) will be split and unlikely reach a threshold for one particular route is questionable.

As stated in my assessment of the Glanville report, If Faringdon Road East were to be reopened and existing traffic diverted from Barrow Road, based on my interpretation of the 'Sheet 3' data there would be an additional 891 vehicle movements along the East of Faringdon Road between 8am and 9am alone.

This would suggest that air quality along Faringdon Road will be greatly reduced for existing residents.

In summary, the proposal to open Faringdon Road East has not been properly assessed and is based on inaccurate data. The proposal certainly isn't future proofed if 4,500 homes are to be developed after 2031.

The information in the Transport Delivery Report is incorrect and should not be accepted by the Inspector, as it does not provide an accurate interpretation of data. The report may provide more detailed evidence of the potential impacts of the initial 1,200 dwellings but if the source data is flawed, the evidence cannot be considered appropriate.

If the proposals are approved and Faringdon Road East is reopened as Site Access 2, I worry for the safety of my children as they walk along what would become such a busy road. I also question whether the air quality will remain within acceptable limits and if existing trees will remain under the new plans. Residents also lose the right to parking in front of their houses, which is essential for some residents who have carers and regular ambulance attendance. The houses will also become unsellable as nobody will want to purchase a property along a main road if there are 1,200 new houses nearby. If vehicle movements are reassessed, it can be argued that the new site access road will have similar conditions to the A415 Marcham Road. There aren't any houses that are located on the road with such small driveways off the road - it is too unsafe. THE PROPOSAL TO REOPEN THE FARINGDON ROAD EAST THEREFORE POSES AN INCREASED RISK TO LIFE AND IT WOULD BE CONSIDERED NEGLIGENT IF THE ROAD IS REOPENED.

There are far more sensible ways of managing future traffic through the development safely, without risking the safety of any of the current Shippon residents and straining existing infrastructure which has not been accurately assessed. The most obvious solution is the creation of a link road between proposed Site access 1 and the existing main barracks entrance on Cholswell Road, with only cycle/pedestrian access along Faringdon Road East. I therefore strongly urge the inspector to reject the findings of the Transport Delivery and Air Quality Reports and request OCC and Glanville change site access 2 location, prepare new surveys and accurately assess the impact of educational commuting along the entire Faringdon Road.

Q6. Please upload any supporting documents below:

No Response

Q7. Would you like to comment on another Main Modification?

Yes

Page 9: Part B - your comments

Schedule of Proposed Draft Main Modifications

Q8. Please provide your comments below:

Removal of Shippon is unnecessary. There is sufficient space in the Dalton Barracks site to build 1,200 homes and keep the development entirely separate from the village of Shippon. Therefore removal of Shippon from the Green Belt is not required. This is very suspicious as the only reason why Shippon would need to be removed from the Green Belt is if there are future plans for the village that we are not being informed of.

Q9. Please upload any supporting documents below:

No Response

Q10. Would you like to comment on another Main Modification?

No

Page 11: Part B - your comments

Please provide the relevant modification number or document to which your comment relates. The list of documents are below: • Schedule of Proposed Draft Main Modifications • Schedule of Draft Maps and Figures • Sustainability Appraisal Report Addendum • Habitats Regulations Assessment Statement re Proposed Draft Main Modifications • Additional Air Quality Evidence • Additional Transport Evidence Proposed Modification Number / Document:

No Response

Q11. Please provide your comments below:

No Response

Q12. Please upload any supporting documents below:

No Response

Q13. Would you like to comment on another Main Modification?

No Response

Page 13: Part B - your comments

No Response

Q14. Please provide your comments below:

No Response

Q15. Please upload any supporting documents below:

No Response

Q16. Would you like to comment on another Main Modification?

No Response

Page 15: Part B - your comments

Please provide the relevant modification number or document to which your comment relates. The list of documents are below: • Schedule of Proposed Draft Main Modifications • Schedule of Draft Maps and Figures • Sustainability Appraisal Report Addendum • Habitats Regulations Assessment Statement re Proposed Draft Main Modifications • Additional Air Quality Evidence • Additional Transport Evidence Proposed Modification Number / Document:

No Response

Q17. Please provide your comments below:

No Response

Q18. Please upload any supporting documents below:

No Response

Q19. Would you like to comment on another Main Modification?

No Response

Page 17: Part B - your comments

No Response

Q20. Please provide your comments below:

No Response

Q21. Please upload any supporting documents below:

No Response

Q22. Would you like to comment on another Main Modification?

No Response

Page 19: Part B - your comments

Please provide the relevant modification number or document to which your comment relates. The list of documents are below: • Schedule of Proposed Draft Main Modifications • Schedule of Draft Maps and Figures • Sustainability Appraisal Report Addendum • Habitats Regulations Assessment Statement re Proposed Draft Main Modifications • Additional Air Quality Evidence • Additional Transport Evidence Proposed Modification Number / Document:

No Response

Q23. Please provide your comments below:

No Response

Q24. Please upload any supporting documents below:

No Response

Q25. Would you like to comment on another Main Modification?

No Response

Page 21: Part B - your comments

No Response

Q26. Please provide your comments below:

No Response

Q27. Please upload any supporting documents below:

No Response

Q28. Would you like to comment on another Main Modification?

No Response

Page 23: Part B - your comments

Please provide the relevant modification number or document to which your comment relates. The list of documents are below: • Schedule of Proposed Draft Main Modifications • Schedule of Draft Maps and Figures • Sustainability Appraisal Report Addendum • Habitats Regulations Assessment Statement re Proposed Draft Main Modifications • Additional Air Quality Evidence • Additional Transport Evidence Proposed Modification Number / Document:

No Response

Q29. Please provide your comments below:

No Response

Q30. Please upload any supporting documents below:

No Response

Q31. Would you like to comment on another Main Modification?

No Response

Page 25: Part B - your comments

No Response

Q32. Please provide your comments below:

No Response

Q33. Please upload any supporting documents below:

No Response

Page 27: Future contact preferences

Q34. As explained in our data protection statement, in line with statutory regulations you will be contacted by the Programme Officer (and where necessary the Council) with relevant updates on the Local Plan. Vale of White Horse and South Oxfordshire District Councils have a shared planning policy database. If you would like to be added to our database to receive updates on other planning policy consultations, please tick the relevant district box(es) below:

I would like to be added to the database to receive planning policy updates for Vale of White Horse

I would like to be added to the database to receive planning policy updates for South Oxfordshire