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Sent: 01 April 2019 12:15
To: Planning Policy Vale
Cc: Planning SE; Blake, Patrick
Subject: FORMAL RESPONSE: Vale of White Horse Local Plan 2031 Part 2 Proposed Draft Main Modifications Consultation

FAO: Planning Policy Team

Our Ref: 6923

RE: Vale of White Horse Local Plan 2031 Part 2: Detailed Policies and Additional Sites - Proposed Draft Main Modifications Consultation

Dear Planning Policy Team

Thank you for consulting Highways England in relation to the proposed main modifications to the Vale of White Horse District 2031 Local Plan Part 2.

Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. In this case Highways England's interests relate to the potential impact of development on the A34.

We would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth within the Vale of White Horse district without careful consideration of mitigation measures. It is important that the Local Plan provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.

When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the A34.

This correspondence follows on from our previous response dated 21 November 2017, produced in response to the earlier Local Plan 2031 Part 2: Detailed Policies and Additional Sites consultation for which our comments remain. Only new/amended policy items are considered below.

We have undertaken a review of the latest information and have the following comments:

Schedule of Proposed Draft Main Modifications – February 2019

Main Modification MM2: Core Policy 4a: Meeting our Housing Needs

We note that the total housing supply as at 31 March 2018 is 25,359 against a total housing requirement of 22,760 dwellings. The significant main modifications are a rise in known commitments from 3,061 dwellings to 13,387 with proposed windfalls remaining low at 1,000 dwellings.

Main Modification MM10: Supporting text, Para 2.98 to 2.100

The Main Modification states that a SPD will be developed to support the delivery of Development of North West Grove. We are supportive of the intention to adopt a cumulative infrastructure requirements approach for Grove

and seek further engagement with the site promoter/s and other interested parties to ensure that development in this location is sustainable in line with the principles of NPPF. MM12 references future feasibility studies regarding the potential reopening of Grove rail station which would be of interest to us, we therefore request to be updated regarding its progress.

Schedule of Draft Maps and Figures

Main Modification MM4: This is an amendment to the Policies Map and Figure 2.3 which reflects the reduced allocation at Dalton Barracks. The proposed strategic allocation (red-line area) will now only occupy about half of the original site area (southwest part of airfield site). This reduced allocation will result in a reduced impact on the A34 and its junctions which is welcomed by Highways England.

Main Modification MM4: This involves amendment(s) to Figures 2.1, 2.2, 2.4, 2.5 and 2.9 to reflect the reduced allocation at Dalton Barracks and/or the deletion of proposed Harwell Campus housing allocation and/or the land safeguarded for upgraded footpath between Abingdon and Shippon. This reduced allocation of 1,200 dwellings at Dalton Barracks and the removal of the Harwell Campus housing allocation will result in a reduced impact on the A34 and its junctions which is welcomed by Highways England.

Main Modification MM6: This is an amendment to the Policies Map and Appendix B to remove land safeguarded for a bus/cycle link to Dalton Barracks. However, it does not impact on the land safeguarded for the proposed west facing Lodge Hill Slip roads or the Park & Ride and is noted by Highways England.

Main Modification MM6: This is an amendment to the Policies Map and an additional map in Appendix B to show upgraded footpath between Shippon and Abingdon. The area highlighted includes the existing footbridge which crosses the A34 just to the south of where the B4017 passes under the A34. Highways England welcomes upgrades to existing walking and cycling facilities but requests that the local authority consults us at the earliest stage possible for any works in close proximity to or above the A34 so that we can advise and work closely with you.

Main Modification MM9: This is an amendment to the Policies Map and Figure 2.6 to reflect the deletion of proposed Harwell Campus housing allocation which was to the northwest of the A34 Chilton junction. Highways England notes this amendment which will remove the impact of future traffic generation from the Harwell Campus housing allocation from the A34 Chilton junction.

Main Modification MM11: This involves an amendment to the Policies Map and additional map in Appendix B to show land safeguarded for Cinder Track cycle improvements which passes under the A34 to the north of the Milton interchange junction. Highways England welcomes upgrades to existing walking and cycling facilities but requests that the local authority consults us at the earliest stage possible for any works in close proximity to or below the A34 so that we can advise and work closely with you.

Main Modification MM11: This involves an amendment to the Policies Map and Appendix B to reduce land safeguarded for dedicated access to/from the A34 to Milton Park. Highways England requests that the local authority consults us at the earliest stage possible for any works in close proximity to or above/below the A34 so that we can advise and work closely with you.

Main Modification MM18: This involves the deletion of the proposed change to Policies Map and delete Appendix M relating to boundary of Lorries and Roadside Services designation at Milton Interchange thus reinstating Local Plan 2011 Saved Policy TR10 boundary. The effect is to retain the full extent of the land safeguarded through LPP1 for a 'lorries and roadside services' scheme at Milton Interchange, as opposed to reducing the extent of the safeguarded land. Highways England advises that there is a severe shortage of lorry parking and any additional facilities or areas for HGV parking that can be made available is most welcome.

Main Modification MM27: This amendment to Appendix is to reflect the reduced allocation of 1,200 dwellings at Dalton Barracks. As per our previous comments Highways England notes this amendment which will reduce the impact of future traffic generation from this site on the A34 and its junctions.

Main Modification MM5: Amendment to Appendix L: Proposed alterations to the Oxford Green Belt to reflect reduced allocation at Dalton Barracks. Please see our previous comments on the reduced allocation at Dalton Barracks.

Main Modification MM17 and MM29: Appendix J: Map showing Local Shopping Centres that are to be retained (from the saved policies of the Local Plan 2011) and those centres that are proposed to be deleted. Highways England notes the amendments.

Sustainability Appraisal (SA) of the Vale of White Horse District Local Plan 2031: Part 2 SA Report Addendum (January 2019)

This report, under Appraisal of proposed modifications, states:

“The appraisal has focused primarily on the proposed changes to the spatial strategy, namely the proposal to delete the 1,000 home Harwell Campus allocation and also delete references to growth opportunity at Dalton Barracks beyond the plan period (consequently removing less land from the Green Belt; also of note is the deletion of reference to providing a link between Dalton Barracks and the Lodge Hill Park and Ride site). Both proposals are found to perform well in respect of ‘landscape’ objectives, but do give rise to tensions in certain respects, most notably in terms of ‘health’ (as the Dalton Barracks proposed modification removes, or at least defers, the opportunity to deliver a new country park) and ‘the economy’ (as the deletion of the Harwell Campus allocation is, on balance, considered to conflict with objectives for expanding the role of the Campus within Science Vale, and the national economy). Other proposed modifications generally perform well, in particular the proposed new Core Policy 15c: Grove Comprehensive Development Framework, which is supportive of several sustainability objectives.”

The screen conclusions have identified that there is a need to examine further through appraisal the following, only the points relevant to us have been set out below:

- Core Policy 4a: Meeting our Housing Needs (MM4) - change to housing growth strategy, namely deleting Harwell Campus and removing references to Dalton Barracks delivering additional housing beyond the plan period.
- Core Policy 8b: Dalton Barracks Supporting text, Para 2.49 to 2.65 (MM4) - change to Dalton Barracks policy (partially consequential to MM2/MM3); and
- Core Policy 12a: Safeguarding of Land for Strategic Highway Improvements within the Abingdon-on-Thames and Oxford Fringe Sub-Area (MM6) - change to infrastructure safeguarding policy, namely additional reference to an upgraded footpath between Shippon and Abingdon, and deletion of reference to a link between Dalton Barracks and Lodge Hill Park and Ride.
- Development Policy 19: Lorries and Roadside Services (MM18) - notable change to extent of designation;
- Appendix A: Site Development Template (Dalton Barracks) - notable change to development template; and
- Appendix A: Site Development Templates (East of Kingston Bagpuize with Southmoor, within Fyfield and Tubney Parish) - notable change to development template.

In the movement section, under Appraisal of proposed modifications it is stated and noted by us that:

“MM2 also proposes deletion of references to growth opportunity at Dalton Barracks beyond the plan period, whilst MM6 removes references to “Provision for a public transport and cycle link between Dalton Barracks and the Lodge Hill Park and Ride site”. The proposal to support a smaller scheme that will not be able to viably support the same level of services/facilities as a larger scheme represents something of an opportunity missed, in ‘movement’ terms, as does deletion of the proposal to safeguard land for the new route to Lodge Hill Park and Ride. However, on the other hand, the SA Report highlighted concerns regarding the performance of this site for housing growth, from a ‘movement’ perspective - see para 10.4.6 - noting that the site does not lie directly on a strategic transport corridor. As such, it is arguably appropriate to support a smaller scheme. It is also important to note that Evaluation of Transport Impacts (ETI) work completed prior to submission did only examine the transport implications of a 1,200 home scheme, such that the transport impacts of a larger scheme in the longer term, particularly in respect of congestion on the A34, remain undetermined (albeit the potential to model transport impacts so far into the future is inherently challenging).”

Statement to Inform Habitats Regulations Assessment of the Proposed Draft Main Modifications for the Vale of White Horse Local Plan Part 2.

We do not have any comments on this but we note that the letter advises that from an HRA perspective, these changes are minor and do not introduce any likely significant effects that were not fully discussed in the previous HRA report.

Vale of White Horse District Council Local Plan 2031: Part 2 Cumulative Impact of Planned Growth on the Air Quality Management Areas (November 2018)

This report considers the likely cumulative impacts of air quality from relevant sites identified within the Local Plan 2031: Part 2 (LPP2) and provides an assessment of the air quality impacts on the Abingdon, Botley and Marcham Air Quality Management Areas (AQMA's).

The report specifically addresses the questions raised by the Planning Inspector, Mr David Reed, presiding over the Examination into the Local Plan 2031: Part 2 set out in his post hearing letter dated 30 October 2018:

1. Reference to the analysis on the Abingdon AQMA being based solely on comments from the VoWHDC Environmental Health team; and
2. That the traffic distribution from the Dalton Barracks site, as traffic data set out in the RPS report relating to the Marcham AQMA was unclear.

It states under Point 1, that the approach to considering impacts on air quality in Abingdon has taken account of several factors, point iii is of interest to us because it states:

iii) Planned highway infrastructure mitigation, including the construction of the upgrade to the Lodge Hill A34 Interchange at Abingdon, which is now fully funded and expected to be completed before the end of 2021, i.e. prior to the commencement of the larger LPP2 sites and that is expected to improve traffic flows through Abingdon.

This is repeated in section 3.3.3 Further Analysis where the report states:

"It should also be noted that the future construction of the upgrade to the Lodge Hill A34 Interchange at Abingdon, which is now fully funded and expected to be completed before the end of 2021, i.e. prior to the commencement of the larger LPP2 sites. This junction upgrade is expected to improve traffic flows through Abingdon, as clearly there will be an increase in route options, thus helping to reduce the reliance on Marcham Interchange."

Highways England will continue to work closely with Oxfordshire County Council and partners to establish the deliverability of and to inform the business case to improve the A34 Lodge Hill Junction to provide south facing slips. We have no objection in principle to the proposal, however, it needs to be demonstrated there would not be a detrimental impact to the safe and efficient operation of the A34 from an improved junction."

Dalton Barracks – Proposed Strategic Housing Allocation – Transport Delivery Report

This Transport Delivery Report has been prepared by Glanville Consultants on behalf of the Defence Infrastructure Organisation (DIO) in respect of the proposed allocation, through the Vale of White Horse Local Plan (Part 2), of Dalton Barracks in Shippon for large scale residential development. The report was prepared in response to the Inspector's letter of 30 October 2018 to the Vale of White Horse District Council, specifically to address the following paragraph extract:

"...more detailed evidence of the potential impacts of the initial 1,200 dwellings is required... This should include estimated traffic generation, trip distribution and the identification as far as possible of any off-site highway infrastructure, improvement or mitigation measures that might be required. This could usefully be informed by more walking, cycling and public transport strategies if available..."

The report identifies that the following development parameters have been applied:

- 1,200 new homes, of which less than 1% are anticipated to be flats;
- 35% 'affordable' homes (420);
- Provision of a two-form entry primary school; and
- Vehicular access to Barrow Road and Faringdon Road East.

Also a change in priority is proposed at the Barrow Road site access, aimed at reducing through traffic along the road further east, when combined with a traffic calming scheme also proposed. The Faringdon Road East access

would take the form of a continuation of the road into the site. Where Faringdon Road meets Cholswell Road to the east, it is envisaged a signal controlled junction would be provided, incorporating pedestrian crossing facilities.

Highways England questions the statement made in para 3.4 of this report that *“The primary school within the proposed allocation is provided with the intention that it serve the development only, rather than providing any material*

additional capacity to serve existing primary school demand arising off-site.” We also question the statement made in para 3.5 that *“As such, trips associated with the school will be internalised, i.e. a trip rate will not be required per pupil and no allowance is necessary for associated external trips within the AM peak hour (the only network peak hour that coincides with a school peak period).”* The site is located in a rural area and the proposed school has the potential to attract pupils from nearby villages, farms and other locations. In addition, if the school gets outstanding OFSTED Reports/reputation it could attract even more pupils from outside of the proposed development. Therefore this should be considered in the trip distribution and assignment of trips.

We note that this report states that the network peak hours of 0800-0900 and 1700-1800 were used. The SRN peaks can often be earlier or later than this and we therefore question if the Marcham Interchange peaks match the network peak. If not the modelled impact may not be robust or reflect the actual peaks at this junction.

The report identifies, in Table 13, the predicted 2031 operational conditions of all of the assessed junctions without mitigation. The Marcham Interchange is identified as operating overcapacity in the AM and PM peaks both with and without development which is a concern to us.

The report states, in para 6.5, that:

“In terms of Marcham Interchange, traffic conditions are anticipated to improve with the introduction of southbound slip roads at Lodge Hill, intended to provide additional route choices and therefore relieve the Marcham Road corridor. OCC has secured funding for these works and they will be completed well in advance of the delivery of the proposed allocation at Dalton Barracks. An assessment of the operating conditions at this junction will be undertaken as part of detailed traffic impact assessments which will be informed by the further work OCC are undertaking with respect to the redistribution of traffic resulting from the delivery of the slip roads. The most likely form of mitigation at Marcham Interchange, if required, is the introduction of traffic signals, consistent with the Hinksey Hill and Milton Interchanges to the north and south respectively.”

We need to highlight that it has yet to be confirmed by modelling that the traffic conditions are anticipated to improve with the introduction of southbound slip roads at Lodge Hill, intended to provide additional route choices and therefore relieve the Marcham Road corridor. So at present this statement cannot hold any weight in any discussions. The applicant needs to continue consulting with us so that we can advise and assist them as the southbound slip roads at Lodge Hill scheme progresses and with any proposed mitigation at Marcham Interchange that is deemed necessary as a result of the Dalton Barracks development.

In the conclusions to this report it is stated that:

“A number of constructive meetings and workshops have been held with Oxfordshire County Council (OCC) in its role as the local Highway Authority prior to the preparation of this report.”

We recommend that the applicant/Glanville consults with us at their earliest opportunity so that we can advise and assist them with any proposed mitigation that is considered necessary on the A34 or its slip roads. This could prevent abortive or unnecessary work by the applicant.

Regards

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