

Comment

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Event Name	Vale of White Horse Local Plan 2031 Part One - Publication
Comment by	Dr Patrick Moseley
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Q1 Do you consider the Local Plan is Legally Compliant? Yes

Q2 Do you consider the Local Plan is Sound (positively prepared, effective and Justified) No

If your comment(s) relate to a specific site within a core policy please select this from the drop down list. N/A

If you think your comment relates to the DtC, this is about how we have worked with the Duty to Cooperate bodies (such as neighbouring planning authorities)

Q3 Do you consider the Local Plan complies with the Duty to Co-operate? Yes

Q4 Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. 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 co-operate, please also use this box to set out your comments.

Paragraph 6.69: ?The baseline statement examined a number of possible improvements to the A34 and its immediate feeder routes. It also identified that it was likely that by 2030, congestion along the route would take place more frequently, and that instances of network congestion outside of peak hours

would increase and that they may occur at any time of the day including weekends. The Statement suggested that congestion may occur through most weekdays and at weekend peak periods.?

The A34 has already been identified as a barrier to growth for the Science Vale. The SQW report states that Begbroke and Oxford will compete for the same business as Harwell Oxford Campus, and that the A34 is a major barrier to growth: (SOURCE: http://www.sqw.co.uk/files/2613/8690/7243/Oxford_engine.pdf)

The URS Strategic Analysis of the Vale of White Horse Local Plan to 2031 Part 1 states: ? There is a likelihood that residents in new housing areas at Harwell Oxford Campus would access employment opportunities further afield. This has the potential to increase traffic on the A34 which is already known to be congested and operating over its designed capacity in peak periods.? (SOURCE: URS, SA of the Vale of White Horse Local Plan to 2031, Appendix 14, SA3)

In addition, the increased traffic on the A34 poses further threats to the tranquillity of the AONB. SA 9 of the URS Strategic Analysis states, with regards to the proposed sites at the Harwell Oxford Campus ?The site is adjacent to the A34 which could lead to increased traffic (and associated air, noise and light pollution), as well as amenity effects for residents nearest the road. The site is in a sensitive location within the AONB which could have significant negative effects in terms of tranquillity of the AONB. Relevant Core Policies 29 (Promoting Sustainable Transport and Accessibility) and 33 (Natural Resources) would apply to reduce the significance of pollution impacts; however given the sensitivity of the AONB this is likely to remain a significant adverse effect.? (SOURCE: URS, SA of the Vale of White Horse Local Plan to 2031, Appendix 11)

The ?Science Transit and bus Study? for dedicated bus routes from Didcot to Harwell have confirmed that Section 4.2, page 15:

?The following additional locations are also expected to experience regular traffic congestion in future years, as residential and employment growth takes place across the Science Vale: v. Hagbourne Hill, northbound approaching the A417 London Road, and southbound approaching the Chilton Interchange (A34/A4185); vi. A4185 Newbury Road, southbound from the Harwell Campus to the Chilton Interchange and the bridge across the A34 at the Chilton Interchange?.

These impacts are significant as the ONLY access Chilton residents have to their village is from the access roads adjoining the A4185 at the Chilton Interchange.

Given that the A34 has been identified as a major barrier to economic growth, and that there is a likelihood that development at the Harwell Oxford Campus would add to traffic issues on the A34, it would appear premature to proceed with large strategic housing allocations within the protected landscape of the North Wessex Downs AONB until (a) there is a proven track record of economic growth in the area (b) issues surrounding capacity on the A34 have been addressed and (c) it has been proven that housing must be located in this area with a full analysis as required by the NPPF paragraphs 115 and 116.

As a result, the Local Plan is unsound.

Summary: Given that the A34 has been identified as a major barrier to economic growth, and that there is a likelihood that development at the Harwell Oxford Campus would add to traffic issues on the A34, it would appear unsound to proceed with large strategic housing allocations within the protected landscape of the North Wessex Downs AONB until (a) there is a proven track record of economic growth in the area (b) issues surrounding capacity on the A34 have been addressed and (c) it has been proven that housing must be located in this area with a full analysis as required by the National Planning Policy Framework ? DCLG (2012), paragraphs 115 and 116 .

Q5 Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate 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.

Given the speculative job growth within the Science Vale, and the transport issues surrounding the A34 and the barrier that congestion poses to economic growth in the Science Vale, it would appear

to be premature to proceed with the largest strategic housing allocations on greenfield sites within the legally protected landscape of the North Wessex Downs AONB until such times as economic growth in the Science Vale is established and transport issues have been remedied.

Only by removing the large scale strategic housing allocations at the Harwell Oxford Campus can the VWHDC fully comply with the NPPF paragraphs 115 and 116, and the CROW Act 2000 Section 85.

Please note *your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Q6 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