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**To:** planning.policy@whitehorsedc.gov.uk  
**CC:** [REDACTED]  
**Date:** 22/12/2014 12:29  
**Subject:** Vale of Whitehorse District Council's Local Plan 2031 Part 1

Dear Sir/Madam

Thank you for inviting the Highways Agency (HA) to comment on the Vale of White Horse District Council's Local Plan 2031 Part 1 Consultation.

The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. In the case of the Vale of Whitehorse District Council this relates to the A34. We would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth at in the Vale of White Horse 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. The HA in general, 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. It is recognised in the Local Plan that to ensure that planned proposals are viable, improvements to the A34 will be required. We support policies in the Local Plan that provide a planning policy framework to ensure there is sufficient infrastructure in place prior to development progressing (as set out in Core Policy 7 - Providing Supporting Infrastructure and Services, further supported by CP33-35 and particularly CP47).

The need for and deliverability of an improvement at Lodge Hill would need to be fully assessed and agreed to support the Local Plan, particularly if the viability of proposed growth is reliant upon such an improvement. From information set out in the Infrastructure Delivery Plan (IDP) October 2014 (p12) growth arising from North Abingdon sites (set out in Core Policy 8 - Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area), requires the creation of south facing slips on the A34 at Lodge Hill. It is also noted that this improvement would be required early in the phasing of development. However this wording does not reflect the wording in Core Policy 8 (paragraph 5.8). It is recognised that the IDP is a live document, so this needs clarification prior to examination.

Therefore as set out above, the HA consider that the Local Plan (principally Core Policy 8 Spatial Strategy for Abingdon-on-Thames and Oxford Fringe Sub-Area and supporting Infrastructure Delivery Plan) as presently set out is not sound, namely it is not positively prepared (the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development), not justified (the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence) and not effective (the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities).

It is vital the Local Plan demonstrates that the deliverability of any required infrastructure to accommodate the proposed growth is fully assessed. The Local Plan would need to demonstrate that there was a reasonable prospect of delivery (including likely cost and who is funding) of the required infrastructure and public transport provision to enable planned growth, to ensure the document is sound. An important part of this process would be to fully assess any constraints to infrastructure delivery such as additional land take, affordability, suitability and viability. The HA have had discussions on proposals but we have not seen any detailed evidence to enable us to assess the potential impacts to the safe and efficient operation of the A34. We recommend that these discussions take place between the HA, Oxfordshire County Council, and Vale of White Horse at the earliest time to fully assess deliverability.

It is recognised that a large proportion of Local Plan growth (both housing and jobs) will be located with the Science Vale Area (Core Policy 13 - Spatial Strategy South East Vale Sub-Area). Proposals will be supported by a delivery focused Area Action Plan (AAP) prepared jointly with South Oxfordshire District Council and Oxfordshire County Council. The HA look forward to involvement with development of the AAP. An assessment of the potential impact of proposals on improvements already identified at the Milton Interchange and Chilton junction needs to be undertaken to ensure growth can be accommodated without impacting on the continued safe and efficient operation of the A34. The deliverability of an identified transport package on the A34 will need to be fully assessed to ensure the AAP is sound. The Evaluation of Transport Impacts Study (November 2014) highlights a number of challenges to delivery of this growth, we welcome early discussions. Although at this stage it is unclear how proposals will be delivered, it is understood this will be set out in the Science Vale AAP and supporting detailed transport package.

We refer you to the Department for Transport Circular 2/2013 (The Strategic Road Network and the Delivery of Sustainable Development) which sets out the way the Highways Agency will engage with communities, local authorities, and the development industry to deliver development and, thus, economic growth, whilst safeguarding the primary function and purpose of the strategic road network. Please see the following link: <https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development>. Paragraphs 16 to 19 are relevant to how the HA will engage with Local Plans.

The HA would like to meet with the Vale of White Horse District Council and Oxfordshire County Council to discuss the issues set out above. Please contact me on the details below. We would also welcome engagement on any emerging transport work that could inform this Local Plan and the proposed Science Vale AAP. The HA are committed to working with all parties to fully understand and assess the potential impacts of proposals on the safe and efficient operation of the A34, to facilitate the successful delivery of proposals.

I hope this is helpful.

Yours sincerely

Patrick Blake, Asset Manager  
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