



OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO SOUTH OXFORDSHIRE LOCAL PLAN PROPOSED SUBMISSION DOCUMENT

Comments close 30th November 2017

Overall Comments

South Oxfordshire currently does not have a five year supply of deliverable housing sites and adopting a new Local Plan will address that issue. While Oxfordshire County Council wishes to support the District Council in its aim to get a new Local Plan adopted, it is concerned that the Plan as currently written is not sound.

The County's key concerns relate to certainty around provision of infrastructure. We recognise that the Inspector examining the new Local Plan will be concerned to ensure that the Plan allocates sites which can viably provide for necessary infrastructure. At this stage we are not able to give reassurance that the necessary infrastructure has been identified and costed. Most of the soundness issues we are raising on this Local Plan relate to these infrastructure concerns.

The way forward is further joint working. Progress has been made this year through the Oxfordshire Growth Board in relation to the publication of an Oxfordshire Infrastructure Strategy (OxIS) and matters such as a decision in principle to prepare an Oxfordshire Joint Spatial Plan. Through the Growth Board, a £215 million Government investment deal for the County was announced with the budget on 22 November 2017. Progress is also being made on wider proposals for the 'Cambridge-Milton Keynes-Oxford Arc', with the National Infrastructure Commission publishing a report on 17 November 2017.

Achieving the long-term ambitions for planned growth in the county will require a sustained partnership approach. South Oxfordshire District Council was the only one of the six authorities in the County not to sign the Memorandum of Cooperation for meeting the objectively assessed need for housing in Oxfordshire last year. We hope that the number set out in the Memorandum for South Oxfordshire District to contribute to Oxford's unmet need can yet be achieved through modification of this Plan, and seek also that further consideration be given to modifications to allocate land close to Oxford.

The County Council wishes to participate at the oral examination of the Plan in order to explain its comments and help the Inspector address any queries in respect of issues the County has responsibility for.

Local Plan Topics

INFRASTRUCTURE DELIVERY

1. The County Council is concerned about whether necessary infrastructure will be able to be funded and delivered. The County Council has responsibilities, for example for transport and education, yet is dependent on funding for example from central government grants and through S106 agreements in respect of development.
2. It is not clear that South Oxfordshire's CIL Charging Schedule will be amended to ensure that S106 contributions can be obtained. As set out in the County's response to the Second Preferred Options, the County Council is concerned that there could be less funding coming forward for specific infrastructure needs from large developments if these are subject to the Community Infrastructure Levy (CIL). The County Council has recently (11 October 2017) supported an amendment to the Regulation 123 list allowing for some schools to be funded through S106 for large developments, but it remains the case that S106 contributions to infrastructure will be restricted unless there are further changes to the Regulation 123 list, and possibly also the CIL Charging Schedule, recognising the new Local Plan sites.
3. Where CIL funds are obtained by the District, the County needs to be confident that a fair proportion of those funds will be available for infrastructure provided through the County Council e.g. highway improvements and schools. There is as yet no agreement on how funds will be apportioned, which means that the County Council is not able to plan for spending.
4. The limitation of CIL and S106 to fully fund necessary infrastructure means that the County Council frequently faces funding shortfalls on costly strategic transport and education infrastructure required to deal with the impacts of growth and needs additional funding sources to ensure its timely delivery. The Oxfordshire Infrastructure Strategy (OxIS) identifies that delivering the necessary infrastructure to support jobs and housing growth in the county to 2040 is estimated to cost £8.35 billion, of which there is currently a £7.14 billion shortfall. We need mechanisms to ensure that funding comes forward when needed.
5. Although the processes for obtaining government funding, amending CIL documents and spending CIL funds are outside of the Local Plan process, an understanding of the funding which is likely to be available for infrastructure is fundamental to examining whether District Plan allocations can be delivered. If there is little or no prospect of adequate funding being obtained for infrastructure necessary in respect of a proposed allocation, then that site should not be allocated for development.
6. The County is also concerned that there has been insufficient attention to what infrastructure is required to support the development proposals in this Plan, its phasing and how much it will cost. An understanding of infrastructure requirements is needed, but the pressure to progress the Plan to submission has meant that key elements of infrastructure, such as those surrounding transport,

have not been adequately investigated through the Evaluation of Transport Impacts (ETI) nor reflected in evidence documents such as the Infrastructure Delivery Plan (IDP). Further ETI work is needed and changes to improve the accuracy of the IDP will be sought. Specific concerns are set out in more detail in respect of each proposed allocation in this response.

7. Urgent progress should be made on infrastructure evidence, a spending strategy for CIL and revision to the Regulation 123 list. This is considered necessary to make the plan deliverable and therefore be considered sound.

Soundness Issue 1 – Further work is required on infrastructure evidence supporting the Local Plan (including the Evaluation of Transport Impacts and the Infrastructure Delivery Plan). The Regulation 123 list should be revised to enable further infrastructure to be obtained through development.

HOUSING NUMBERS

8. This Proposed Submission Local Plan indicates (e.g. Table 5c of the Plan) that the total predicted housing supply to 2033 is 22,563. This figure is in excess of that being planned for which is set out as 20,800, made up of 17,050 for the District's own need (set out in Policy STRAT2) and 3,750 as a contribution to Oxford's unmet need (set out in Policy STRAT3). The difference between 22,563 and 20,800 (1,763) is in excess of the difference between the 4,950 houses apportioned to South Oxfordshire by the Oxfordshire Growth Board and the 3,750 proposed by SODC to contribute to Oxford's unmet need (1,200).
9. The County Council considers that the correct figure to plan for is 22,000, acknowledging the proposed 17,050 for the District's own need to 2033 and 4,950 for Oxford's unmet need to 2031. Such a Local Plan would be in accordance with the resolutions of the Oxfordshire Growth Board and the Memorandum of Cooperation signed by all other Oxfordshire Councils. Planning for this figure requires no change in the proposed housing number of 22,563, although it does reduce the size of the flexibility buffer South Oxfordshire District Council has included.
10. The Growth Board apportionment of 4,950 homes to South Oxfordshire was based on the outcome of a joint programme of work that tested a range of spatial options and provided high level evidence of each district's capacity to sustainably accommodate an element of unmet need. South Oxfordshire's proposed contribution of unmet need in this Local Plan is a quarter of the 15,000 homes which is the Growth Board's working assumption of the total scale of unmet need. The County Council considers this approach is unsound.
11. All other local planning authorities in Oxfordshire have accepted their full share of unmet need according to the Memorandum of Cooperation and are taking their figure through their local plan process: the proposal for 3,750 homes leaves an undersupply of 1,200 homes across the Oxfordshire housing market area and there is no mechanism in place for it to be picked up elsewhere in the short term. In under-providing for unmet need there is a risk that South Oxfordshire District

Council's approach will undermine the Growth Board apportionment process which is justifying the unmet need figures in the other districts' local plans.

12. It is acknowledged that there is a government consultation on a new SHMA methodology (14 September 2017 to 9 November 2017) but this Plan is proceeding in advance of any resolution on that. The County Council has responded on the SHMA methodology consultation identifying a number of concerns with the proposed new SHMA methodology.

13. It is also acknowledged that this South Oxfordshire Local Plan includes a proposal to undertake a Partial Review to address the housing numbers further upon adoption of the Oxford Local Plan. A plan review, or alternative work through a new Oxfordshire Joint Spatial Plan, would already be anticipated as circumstances change, so it is considered that this is not a positive response. We also consider that the partial review mechanism may not be effective in relation to addressing the locations for Oxford's unmet need (discussed further in paragraph 23 below).

Soundness Issue 2 – The scale of housing need being planned for should be amended to be 22,000 (17,050 + 4,950) to be consistent with the resolutions of the Oxfordshire Growth Board. Policy STRAT3 should be amended to reflect the 4,950 figure.

14. The sources of housing supply as set out in the Plan (5.2 and 5.8) are:

- Completions (approximately 3,400)
- Strategic allocations (8,500 of which 6,575 are expected in the plan period)
- Retained core strategy allocations and commitments (approximately 10,000)
- Sites in towns (1,155)
- Sites in larger villages (1,049)
- Windfall and sites in smaller villages (500)

15. The strategic allocation total is made up of:

- Land Adjacent to Culham Science Centre – 3,500 (1,650 in plan period)
- Berinsfield – 1,700
- Chalgrove Airfield – 3,000 (2,925 in plan period)
- Wheatley Campus – 300

16. Culham Science Centre is likely to start building later and not complete building within the Plan period. It will be difficult to build out the Culham site as there is a need to progress with transport infrastructure improvements such as the Didcot-Culham River Crossing and Clifton Hampden Bypass first. Given the evidence available, it appears optimistic to suggest 1,650 houses can be built on the land adjacent to Culham Science Centre in the plan period and that the other allocations will largely build out. These concerns are set out in more detail later in this response in respect of each site.

17. As the focus of this County response is on infrastructure for key sites, we have not reviewed the deliverability of the retained Core Strategy allocations (Table 5a) which include 300 houses by the Orchard Centre, 300 houses at Vauxhall

Barracks and 642 houses at Ladygrove East. We anticipate further work with the District Council in respect of the Didcot Garden Town Masterplan in respect of such sites, particularly having regard to the capacity constraints on the existing highway network. There is likely to be a need for additional infrastructure to enable such sites to proceed.

18. The reliance on Neighbourhood Plans to deliver sites suitable for some 2,000 houses in the towns and larger villages is a matter of concern to us as noted in our responses to the First and Second Preferred Options (August 2016 and May 2017). The only allocations proposed in this Plan for a larger village are those at Nettlebed (three sites for 46 houses). The requirements for the other towns and villages are now as follows (Policy H3 and Policy H4):

- Henley-on-Thames – 350
- Thame – 510
- Wallingford – 295
- Cholsey – 195
- Crowmarsh Gifford – 110
- Goring-on-Thames – 140
- Sonning Common – 150
- Watlington – 260
- Woodcote - 160

19. The County's concerns with leaving such a large number of house allocations to neighbourhood plans relate to effective infrastructure planning. The locations of housing allocations will need to be considered upon each individual Neighbourhood Plan. Policies H3 and H4 also provide for speculative planning applications in the event that neighbourhood plans do not proceed to allocate sites which could lead to unforeseen consequences as infrastructure will then need to be considered incrementally in respect of individual planning applications.

Soundness Issue 3 – The plan is not justified as there is not a robust and credible proportionate evidence base for deliverability of the housing figures. Further work is required and additional allocations may be needed.

LOCATIONS OF HOUSING

20. The County Council's comments at earlier stages indicated that there may be a need for other site allocations close to Oxford. Apart from the redevelopment of Wheatley Oxford Brookes for 300 houses, the sites proposed are not particularly close or convenient to Oxford. The Oxfordshire Growth Board in its strategic spatial options analysis assessed sites at Grenoble Road, Wick Farm and Thornhill as potentially suitable for addressing Oxford's unmet need. The County Council itself has put forward a landholding at Guydens Farm on the B480 and Oxford Road close to the Eastern Bypass and Grenoble Road, and is seeking that land in that area be allocated. Please see our separate County Council Property and Facilities response for further detail on this. Sites close to Oxford could be well connected to Oxford's key employment locations and the City

centre and help to deliver the Oxford Transport Strategy. Such sites would build on existing public transport and other infrastructure capacity and help fund the delivery of planned transport investment in Rapid Transit corridors and cycling and walking improvements.

21. Planning for Oxford's unmet need should not be done in isolation of the spatial implications of the housing number. The spatial strategy fails to recognise the implications of providing for the significant number of people who will need to commute into Oxford. In the absence of allocations which are close or easily accessible to Oxford, there is likely to be an increase in long distance commuting by private car, adding pressure to the already congested highway network in and around Oxford.
22. Other Oxfordshire emerging local plans identify sites for Oxford's unmet need in specific locations where there is access to existing, or planned, fast and frequent public transport links (Rapid Transit), and cycling and walking links to the City centre and key Oxford employment locations and/or where development will strengthen the business case for strategic infrastructure. The County Council does not accept that Green Belt is an absolute constraint as exceptional circumstances are being justified in other circumstances, including within South Oxfordshire at Berinsfield and Culham. The locations that other Districts have put forward are:
- Cherwell: Sites to be removed from the Green Belt in North Oxford, A44 corridor, South and South East of Kidlington;
 - Vale of White Horse: Sites in the Abingdon and Oxford Fringe Sub-area, including sites removed from the Green Belt through Local Plan Part 1 and Dalton Barracks which is proposed to be removed from the Green Belt through Local Plan Part 2;
 - West Oxfordshire: Sites at Eynsham Garden Village adjoining the Green Belt and West Eynsham.
23. The Proposed Submission Local Plan Policy STRAT3 includes a proposal to undertake a Partial Review of the Local Plan on adoption of the Oxford Local Plan (para 4.28). Policy STRAT3 does not commit to when a partial review would be completed. The County Council considers that a partial review may not be an effective way forward, particularly given that proposals are being developed for a Joint Spatial Plan. Instead, to make the Plan sound, the joint work undertaken through the Oxfordshire Growth Board strategic work programme on Oxford's unmet need should be referred to, and modifications should be prepared after consideration of additional sites.

Soundness Issue 4 – The plan has not been positively prepared in addressing the needs of the neighbouring Oxford City and its likely unmet need. Further work is required to assess the potential for site allocations which are close and accessible to Oxford City in order to encourage sustainable journeys and reduce air pollution. Policy STRAT3 should be consequently amended as the housing sites will be identified and a partial review will not be needed.

OXFORD'S UNMET AFFORDABLE HOUSING NEED

24. The significant need for affordable housing is the driver behind the scale of Oxford's Objectively Assessed Need as identified in the SHMA 2014. No commitment is made in this Plan to work with Oxford City in respect of housing people who have registered for assistance. Other Districts, such as Vale of White Horse, have included a commitment in their Plans to work jointly with Oxford City to put in place arrangements for allocating affordable housing to those on the Oxford City housing register.

Soundness Issue 5 – Policy STRAT3 and supporting text should be amended to include a commitment to work jointly with Oxford City Council to put in place arrangements for allocating affordable housing.

TRANSPORT OVERVIEW

25. The County Council has produced documents that help to identify transport issues and plan for the future such as the Local Transport Plan 4 which was updated in 2016 and the Oxfordshire Infrastructure Strategy 2017 (OxIS). We are also actively engaged where possible in reviewing government initiatives such as the Oxford to Cambridge Expressway and East-West Rail, and initiatives of others such as a Thames Crossing at Reading.

26. We have worked with Districts in preparing Evaluations of Transport Impact (ETI) in respect of Local Plans. The ETI uses the Oxfordshire Strategic Model. Given its strategic nature, the model does not specifically address local areas, resulting in the need for additional modelling in those areas. A particular area of concern is Abingdon, as the strategic model does not appear to validate well and there is an Air Quality Management Area. Abingdon itself is in the Vale of White Horse, but will be affected by development in South Oxfordshire, such as that at Culham. The cumulative impact of development for South Oxfordshire and Vale of White Horse is currently being tested. Until this work has been completed, it is not possible to comment fully on the transport impacts.

27. Another area of particular concern in respect of the strategic model is the area around Chalgrove Airfield given that it has in the past not been affected by significant levels of development. Additional or alternative transport infrastructure options to mitigate the effects of development at Chalgrove Airfield may need to be assessed in the ETI. The suggested Watlington, Stadhampton and Benson bypasses have been included as suggested mitigation, but further work is needed to assess the suitability of these and their impacts.

28. Transport impacts in areas towards the edge of the County have not been fully assessed. Discussions with neighbouring authorities have taken place regarding the sharing of data but further work is needed to assess transport impacts outside the area of detailed modelling. The impacts of growth across the County boundary, for example at Princes Risborough, need to be fully understood.

29. In the absence of designed and funded transport infrastructure it is likely that the County Council will object to planning applications for development on allocated sites in its capacity as the Highway Authority.

Soundness Issue 6 – Further Evaluation of Transport Impacts is needed to ensure that the Plan is supported by a robust and credible evidence base.

PUBLIC TRANSPORT, WALKING AND CYCLING

30. The County Council supports references to promoting public transport, walking and cycling.

31. Amendments should be made to paragraph 4.33 which sets out a strategic approach for Science Vale as set out in the box below. The amendments are needed as the text is currently not clear, for example it suggests a ‘cycle strategy’ which may or may not be referring to the Science Vale Cycle Strategy or the Active and Healthy Travel Strategy which are available on the County Council’s website as part of Local Transport Plan 4.

Soundness Issue 7 – Text changes to clarify the strategy for Science Vale:

4.33 Our strategic approach for Science Vale:

- ...
- A “step change” in travel choices away from car travel towards public transport, cycling and walking with Didcot at the heart of a fully connected Science Vale
- ~~Didcot’s role as a major rail interchange strengthened, including aspirations for rail services direct from Grove and Wantage~~
- Didcot Parkway Railway Station and its role as a major rail interchange improved
- Culham railway station to be improved and transformed into a focal point for the new community
- A new railway station at Grove in the longer term
- Improvements to capacity of the rail lines
- ~~A cycle strategy for Science Vale that enables people to reliably travel between their homes and their jobs by means other than the private car linking Didcot with the key employment centres at Culham Science Centre, Milton Park and Harwell~~
- Convenient bus services throughout the area
- More and better cycling and walking links to encourage reliable, active and healthy travel

32. There are a number of references in the Plan to the South Oxfordshire Design Guide, and some references to other guides such as the Chilterns Building Design Guide by the Chilterns AONB Board and Secured by Design by the Police Department. Appropriate reference should also be made to the County Council’s Cycling Design Standards 2017, Walking Design Standards 2017, and Residential Road Design Guide 2nd Edition 2015. These are all available on the

County Council's website. A suggested location for such a reference is in Policy DES3 on Design and Access Statements as set out in the box below.

Soundness Issue 8 – Reference to Oxfordshire County Council's design guidance, for example in Policy DES3:

'Where an application is required to be supported by a Design and Access Statement, this must demonstrate how the development proposal meets the key design objectives of the South Oxfordshire Design Guide and the design criteria set out in Part 2 of the Guide, as well as other relevant design guidance such as Oxfordshire County Council's Cycling and Walking Design Standards'.

EDUCATION OVERVIEW

33. The County Council produces an annual Pupil Place Plan which is made available on its website. Pupil numbers at both primary and secondary level are forecast to increase and new schools are required together with extensions to existing schools. A key concern is how to fund these required additional pupil places, a matter also discussed in the Pupil Place Plan. Unless funding can be assured, it may be that the Local Plan is not effective – that is it may not be deliverable as the identified school places may not be forthcoming.
34. The size of the allocations at Culham, Chalgrove Airfield and Berinsfield means that they create a need for whole new primary schools. Two new primary schools are likely to be required on each of these. At Berinsfield it is intended that one of the new primary schools will involve a relocation of the existing one.
35. The primary school pupil generation from approximately 300 houses at Wheatley can be expected to be accommodated at the existing primary school, but there would be a capacity issue if more houses are proposed in the area, and it is not clear how this can be resolved as the existing primary school is already as large as most in the County at two forms of entry. It could be that a new school would be needed on the Wheatley Oxford Brookes site if sufficient capacity could not be found elsewhere.
36. Additional secondary school capacity will be needed in the District. It is proposed that growth at Culham, Berinsfield and surrounding areas will be addressed by a new secondary school on the land adjacent to the Culham Science Centre. Growth at Chalgrove and surrounding areas is proposed to be addressed by a new secondary school on the Chalgrove Airfield site, which will involve relocating the existing Icknield Community College in Watlington.
37. Additional capacity for primary provision in the towns and larger villages will need to be considered through Neighbourhood Plans and the Didcot Garden Town Masterplan. An additional secondary school is planned at Didcot North East and a new secondary, Aureus, opened on Great Western Park in Didcot in September 2017. Other secondary schools, such as Wheatley Park School and Wallingford School are expected to expand.

38. In addition to primary and secondary schools, publicly funded provision is also expected for Special Education Needs and for early years and child care.
39. The County Council is not confident that the policies for the strategic sites provide for the anticipated need for additional land for education. Furthermore, the Infrastructure Delivery Plan does not make clear the anticipated requirements. As set out in Soundness issue 1, the County Council is concerned about how proposed new and expanded schools will be funded. It is the case that new schools are generally only deliverable if the sites and construction costs are fully provided through developer funding. If the operation of S106 and CIL does not ensure sufficient investment, then the County Council considers that the Plan is not effective as it will not enable the delivery of sustainable development.

Soundness Issue 9 – Further work is required, in particular on the Infrastructure Delivery Plan and the Regulation 123 list, to have confidence that the Plan will be effective - that is that it will be deliverable over the plan period in relation to providing for new and expanding schools.

MINERALS

40. The County Council accepts that the District has had regard to the adopted Minerals and Waste Core Strategy 2017 in its Proposed Submission Local Plan. Policy EP5 is supported. This policy indicates that development will normally be directed away from Minerals Safeguarding Areas but where that cannot be avoided, all opportunities for mineral extraction will need to be fully explored. The policy is broadly in line with the Mineral and Waste Core Strategy Policy M8.
41. Parts of the strategic development sites at Culham and at Berinsfield are within Minerals Safeguarding Areas for sharp sand and gravel. In addition, there are sharp sand and gravel deposits underlying the Chalgrove Airfield area although these are not safeguarded. Development sites which arise from neighbourhood plans may be within mineral safeguarding areas, there are in particular potential concerns in Wallingford, Benson and Cholsey. Government planning practice guidance on Minerals is to show Mineral Safeguarding Areas on the District's Local Plan policy maps and this could help in this case.
42. In accordance with the proposed Policy EP5 in the Local Plan, it will be necessary for applicants to consider the opportunities for mineral extraction prior to developing sites within mineral safeguarding areas for housing, and to consider how development of the sites might happen along with potential quarrying on other sites nearby. Additional text, perhaps located to support Policy EP5, should clearly set this out.

Soundness Issue 10 – Additional text is required to support Policy EP5 noting Mineral Safeguarding Areas need to be taken into account in respect of allocations at Culham Science Centre and Berinsfield, and that they also need to be taken into account in preparing Neighbourhood Plans. Mineral Safeguarding Areas could be added to the Policy Map.

DEVELOPMENT MANAGEMENT POLICIES

43. The County Council's focus in these comments is on issues of particular concern regarding infrastructure. We have not reviewed the development management policies in detail.

Local Plan Sites

44. Site allocations are subject to individual policies which are discussed in some detail in later comments under the site headings. In addition, we have a general concern that the policies are loosely worded and not consistent with one another. In respect of matters that the County Council has a particular interest in, we note for example that some policies refer to public transport while others don't. We consider that modifications are required to refine site policies. Some suggested text is in Attachment 1. These comments are provided separately from general concerns about the allocations set out in the main text of this response.

Soundness Issue 11 – Omissions and inconsistencies between site allocation policies should be addressed through modifications.

CULHAM SCIENCE CENTRE AND LAND ADJACENT

45. There are two adjoining allocations: STRAT6 refers to the Culham Science Centre and STRAT7 refers to land adjacent to it. STRAT7 includes both the Culham No.1 site which has some existing development on it, and the land to the west of the railway line which is greenfield. The exceptional circumstances for removing the land from the Green Belt are set out in the Plan.

46. As set out in our response to the Second Preferred Options in May 2017, we support in principle redeveloping land at Culham Science Centre for employment growth, particularly in science and technology and innovation, and allocating land for significant mixed use development. The proposed scale of development would significantly strengthen the business case for known infrastructure priorities. These include accelerating investment in significant rail capacity upgrades between Didcot and Oxford, including at Culham station, together with more frequent rail services; providing for a new Didcot-Culham Thames Crossing, and bypassing Clifton Hampden.

47. As set out in earlier paragraphs, there is minerals safeguarding over parts of this land - the County Council is not objecting to the allocation of the land adjacent to Culham Science Centre in respect of this, but expects it will be taken into account in any development proposals. In addition to minerals safeguarding, the Minerals and Waste Core Strategy includes an appendix listing existing and permitted waste management sites which remain safeguarded pending adoption of a Site Allocations Document. These include Waste Management Site Number 216 on the Culham No. 1 site. Policy STRAT7 provides for the retention and increase in employment land so is considered not to be contrary to this safeguarding, as retention or relocation of a waste facility should be possible.

48. A scoping application has been lodged, P17/S3719/SCO, in respect of a residential led mixed use development on the land adjoining Culham Science Centre – a Culham Science Village. The County Council has provided a response which is available on the District Council's planning application register.
49. A clear policy steer should be provided within the Local Plan to ensure that the transport effects of new development are fully addressed and there is no mathematical reduction in the number of trips expected as a result of supposed development rights at the Culham No. 1 site. Only existing trips on the network can be discounted from the future trip numbers generated by the housing allocation. This is important as a reduced forecast for traffic growth could impact on infrastructure delivery, which is highlighted as a key requirement for site delivery.
50. The most significant issue from the County's point of view is road transport capacity. There are capacity issues west towards Abingdon, south towards Didcot via the Culham Bridges and east to Clifton Hampden. It is expected that these can be largely addressed through planned transport infrastructure, but transport assessment work is ongoing. The District Council has recognised that this site is likely to be unable to build out during the plan period due to highway constraints (some 1,650 of the total 3,500 homes are expected in the plan period), but we seek that this be made more explicit in the Local Plan as set out in the box below. In addition, references to contributions to the new Thames crossing between Culham and Didcot and the Clifton Hampden bypass which are made in STRAT7 should be added to STRAT6 if a viable contribution can be made.
51. Policy STRAT7 as drafted does not specifically mention the need for improved cycling and walking links. This omission should be corrected. It is proposed, for example, that there be a new walking and cycling bridge over the Thames north of Culham (reflected in the Infrastructure Delivery Plan ref DW130). This new route will connect to the National Cycle Network Route 5 to Abingdon, Radley, Kennington and Oxford, and to the Thames Path, which would otherwise only be accessible via a long diversion to Abingdon. Suggested amended text is set out in Attachment 1.
52. The County Council supports the proposal in Policy STRAT7 that there be a supplementary planning document (SPD) to ensure that there is comprehensive development of the land on and adjacent to Culham Science Centre. The SPD should be prepared as soon as possible, involving the County Council and the developers. It should be expected that the SPD will be completed prior to an application for development so that it is complied with. Suggested amended text is set out in Attachment 1.
53. As set out in Soundness Issue 1, further work is required on the infrastructure evidence supporting the Local Plan. The Regulation 123 list should be revised to enable further infrastructure to be obtained through development.

Soundness Issue 12 – The Local Plan needs to be amended to clearly state the
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infrastructure challenges associated with development at and adjoining Culham Science Centre and the need to ensure that these are able to be resolved prior to any development proceeding. Given that mitigation through a new Culham-Didcot Thames Crossing and Clifton Hampden Bypass is likely to be required, and funding for that is not yet assured, it should be made clear that development will not start early in the plan period and that the site will not fully build out in the plan period. Both policies should provide for potential funding contributions to the Culham-Didcot Thames Crossing and Clifton Hampden Bypass.

BERINSFIELD

54. The District Council has been working for over a year on a regeneration project for Berinsfield to be funded by development. The County Council supports the inclusion of proposals within the Local Plan and has been liaising with the District as the community investment scheme has progressed. The County Council is also providing advice in respect of its property interests as the proposals involve relocating and expanding existing facilities on County land within the existing part of Berinsfield such as the library.
55. The exceptional circumstances for removing the land from the Green Belt are set out in the Plan. It is understood that the District Council seeks to ensure that the profits from development are used to support Berinsfield. The County Council's primary concerns are about ensuring that necessary infrastructure is funded and provided, and we therefore welcome the District Council led approach.
56. As set out in earlier paragraphs, there is Minerals safeguarding over parts of this land, but the County Council is not objecting to the allocation in that respect given the recognition of the need to consider mineral working in the Local Plan.
57. A scoping application has been lodged, P17/S3835/SCO, and the County Council has provided a response which is available on the District Council's planning application register.
58. Berinsfield is located to the east of Culham Science Centre, and given that a lot of traffic will use the A4074, it can be expected that traffic issues concerning the effects on Abingdon, and travel through Clifton Hampden and to Didcot and will be on a lesser scale. However, those issues still need to be addressed and this is not reflected in the Plan as drafted, for example there is nothing in this policy like that at Culham regarding a contribution to the Didcot-Culham Thames Crossing and/or Clifton Hampden bypass and this should be amended to ensure a consistent approach to road transport. In addition, reference should be made to the need to upgrade the Golden Balls roundabout on the A4074.
59. A key additional transport concern with the Berinsfield allocation, relates to how the bus stops on the main bus route on the A4074 will be beyond normal walking distance for the new occupants. It is expected that pump-priming of additional bus services which travel through the expanded Berinsfield will be needed. Amendments are suggested in Attachment 1.

60. Discussions are ongoing with the District regarding the need for a new primary school and the future of the existing primary school. We understand that current proposals are to set aside land for two new primary schools, one of which would involve relocating the existing school.
61. The County Council's strategy for secondary education involves a new secondary school on the land adjacent to the Culham Science Centre to the west of Berinsfield. Good public transport links between Berinsfield and Culham will be needed. Given that development at Culham could be more delayed than at Berinsfield, flexibility will be required around how to provide the necessary secondary capacity.
62. As set out in Soundness issue 1, further work is required on the infrastructure evidence supporting the Local Plan. The Regulation 123 list should be revised to enable further infrastructure to be obtained through development.
63. It is considered that Policy STRAT8 as written, while appropriately noting the importance of investing in social infrastructure, and making mention of public transport, does not appropriately reference the need for improved highways infrastructure and make provision for better walking and cycling links. As with other sites, the proposal for a masterplan should also be formalised into a SPD. Some of these issues are addressed in Attachment 1.

Soundness Issue 13 – The Local Plan needs to be amended to clearly state the infrastructure challenges associated with development at Berinsfield and the need to ensure that these are able to be resolved. Further consideration should be given to how much development is possible in this location prior to a new Culham-Didcot Thames crossing and Clifton Hampden Bypass being funded.

CHALGROVE AIRFIELD

64. The County Council has raised concerns in the last two consultations over the proposed allocation of land at Chalgrove Airfield. The concern is driven by the remote location and how various villages may be affected. This is also a complex site, for example it is proposed to move an existing runway to the north and allow for the use of that by Martin Baker Ltd. The Local Plan and its evidence do not provide a clear picture of what additional infrastructure is needed, but it is apparent that proposed transport infrastructure already included in the County's Local Transport Plan 4 will not be sufficient. We consider that a substantial investment in additional infrastructure is likely to be needed, for example to improve connectivity between this area and other areas for employment, shopping and high level services and facilities e.g. hospitals. We are concerned about whether such investment will be forthcoming given the funding deficit for already planned infrastructure in the County. The County Council generally seeks that new development be directed to locations which make the best use of existing infrastructure or support the case for already planned infrastructure.
65. A scoping application has been lodged, P17/S3565/SCO, and the County Council has provided a response which is available on the District Council's planning

application register. The response refers to our understanding that the landowners (the Homes and Communities Agency) will continue to engage with groups at Chalgrove, Cuxham, Stadhampton, Chiselhampton, Watlington, Little Milton, Shirburn, Berrick Salome and Benson amongst others and that it may be that agreements outside of the planning process are appropriate to address some issues.

66. The County's key concerns relate to transport infrastructure. Due to the rural location of the site, there is a risk that this will be a car-based development. Although the proposed allocation suggests some local employment and encourages walking and cycling links, there will be effects on the highway network. The Evaluation of Transport Impacts does not, to date, adequately address this, as set out later in this response.
67. The County's concerns around education infrastructure are more straightforward to address than transport, but still require a range of actions to be successfully implemented. To address primary and early years education needs, two new primary schools in addition to the existing one in the village of Chalgrove are likely to be needed, and other child care facilities may be required. To address secondary school capacity, the County Council's strategy involves relocating Icknield Community College to a new secondary school site on Chalgrove Airfield. The alternative of enlarging Icknield Community College through procuring additional land in its current location at Watlington is not as attractive. Having two competing small secondary schools in close proximity is not an alternative that is acceptable from a strategic perspective.
68. We are aware that the Homes and Communities Agency wrote to the District Council on 31 August 2017 about infrastructure improvements, and that letter is on the Chalgrove Airfield development website. It refers to the Homes and Communities Agency being committed to funding for the schools, which the County Council welcomes. In respect of transport, the letter sets out some proposals, but it is our view that these are not sufficient to establish that the allocation is deliverable. For example:
- There are commitments relating to part funding new edge roads or bypasses at Watlington, Stadhampton and Benson. The County Council queried the proposed safeguarding in its May 2017 comments and maintains a number of these queries, as set out later in this response in respect of the safeguarding and the ETI. It is not clear what the wider impacts of such new roads are. It is not our understanding that there are any legal agreements with landowners at this stage to bring about such roads. Whether the County Council would be able to suggest the imposition of a Grampian Condition (that is a condition preventing development until such an edge road / bypass is funded or built) is unclear as such conditions can normally only be imposed where there is reasonable certainty over the infrastructure improvement coming forward within a specific timeframe.
 - There is a commitment to funding and delivering a scheme at Hollandtide Lane to improve highway safety and accommodate a greater volume of traffic. Improving Hollandtide Lane will potentially lessen impacts on other settlements such as Stadhampton and Berrick Salome as it will provide a more direct traffic route between Chalgrove Airfield and Benson. However, it

is not clear what the wider traffic impacts of this are, and there has been no assessment to date in the ETI. There is no safeguarding proposed to provide for widening the road and it is not clear whether compulsory purchase of land might be required.

- There is a commitment to improving bus services which is welcomed, but support to pump-prime services should be based on services becoming eventually commercial.
- The letter does not identify what measures may be needed in respect of rat-running, and impacts on villages such as Little Milton and Cuxham.

69. At this stage, given the information available, we are not able to comment on whether the transport impacts of development at Chalgrove Airfield will be able to be mitigated sufficiently for an application for the scale of development proposed. We foresee that there will be additional or alternative transport mitigation works required to those set out in the August 2017 letter, once further assessment has been undertaken. For example, since then, further to the ETI work to date it is apparent that there will be a requirement to improve Golden Balls roundabout.

Soundness Issue 14 – Further evidence is needed to be confident that the infrastructure challenges associated with development at Chalgrove Airfield are able to be addressed. If confidence can be achieved, then the Local Plan will need to be amended to better set out the infrastructure requirements and likely phasing of development having regard to the timescales for providing the necessary infrastructure.

WHEATLEY

70. The redevelopment of the Wheatley Oxford Brookes site for some 300 houses is a relatively small scale allocation which raises no strategic issues for the County Council. The District Council's decision to retain this land in the Green Belt is not a matter that requires comment from the County.

71. The proposal to remove a further area of land from the Green Belt at Wheatley to allow for an allocation to proceed in a Neighbourhood Plan also raises no strategic issues.

72. Development of some 300 houses on the site would need to address bus services as well as cycle and walking links. The Policy STRAT10 omits the former issue, which should be added to help ensure that the policy is effective, as set out in the box below.

73. A scoping application P16/S3686/SCO was made in 2016 by the landowners for up to 750 dwellings. The County's response raised concerns as that quantum of development would not be able to be absorbed by the existing schools without expansion. A larger quantity of housing would also have additional transport implications. It should be made clear in the allocation what the acceptable quantum of housing is, as 'at least 300' provides little guidance. It is recommended that this is replaced with 'approximately 300' as set out in the box below unless by the time this is considered by the Inspector it has become clear,

through negotiations, that more housing can be catered for by a local primary school expansion and transport effects can be mitigated in which case the agreed number can be included.

Soundness Issue 15 - Policy STRAT10 text – amendments are required to specifically refer to the need to deliver public transport improvements, and to clarify that the land should deliver approximately 300 homes. Suggested amendments follow:

Land at Wheatley campus will be developed to deliver ~~at least~~ approximately 300 new homes.
ix – support for bus services through the site.

DIDCOT

74. The County Council responded on the Didcot Garden Town Proposed Delivery Plan in July 2017. The County Council supports the delivery of housing and economic growth in Didcot.

HENLEY-ON-THAMES, THAME AND WALLINGFORD

75. The County Council considers that there is scope for suitable sites to be found at Thame for the 510 additional houses suggested, and at Wallingford for the 295 additional houses suggested. To help ensure that developments can viably address transport mitigation measures, larger sites are preferable. There is a recent resolution to approve development for some 502 homes at Wallingford which the County Council did not object to (P16/S4275/O – resolution 8th November 2017).

76. We set out our concerns about additional housing at Henley-on-Thames in our response to the Second Preferred Options in May 2017. The numbers have been amended so that Henley-on-Thames has a reduced requirement, now 350 houses. The County Council remains concerned that suitable sites will be difficult to find for that number of houses given that the transport network in the area is over capacity, but accepts that the issue may be able to be addressed through the Neighbourhood Plan process. As Henley is outside the area of detailed modelling in the Oxfordshire Strategic Model, additional transport evidence will be needed to support a revised Henley and Harpsden Neighbourhood Plan assessing the impacts on the transport network and proposed mitigation measures.

LARGER VILLAGES

77. The Local Plan clearly sets out the housing numbers that must be met at the larger villages (Benson: 0; Berinsfield: 0 due to strategic site; Chalgrove: 0 due to strategic site; Chinnor: 0; Cholsey: 175; Crowmarsh Gifford: 110; Goring-on-Thames: 140; Nettlebed: 46 through allocations; Sonning Common: 150; Watlington: 260; Wheatley: 0 due to strategic site; and Woodcote: 160). Given

the relatively small numbers, the County Council will seek to address any concerns through Neighbourhood Plans or individual applications.

Safeguarding for Transport Schemes

78. The County Council generally supports safeguarding for transport schemes. Support for safeguarding does not mean that there is commitment to funding a scheme. Given that ETI work is not complete, it is not known whether additional safeguarding is needed.
79. The County Council in its Second Preferred Options comments in May 2017 referred to the need to consider safeguarding to provide for upgrading Culham Station and the railway line in that vicinity. We accept that the policy for the allocation of land (STRAT7) addresses this by indicating that the layout of the development should recognise plans for improvements to Culham Station and any associated future rail capacity upgrades and that safeguarding is not required.
80. The route for the Oxford to Cambridge Expressway has yet to be identified. If an agreed route in future includes land within South Oxfordshire, the scheme route should be protected by safeguarding in a review of the Local Plan or Joint Strategic Spatial Plan.
81. Comments below refer to each of the proposed safeguarding maps.

DIDCOT-CULHAM RIVER CROSSING AND CLIFTON HAMPDEN BYPASS

82. We support the proposed safeguarding of two alternative options for the River Crossing road, and land to provide for a Clifton Hampden bypass. Some funding is being sought in the HIF Bid made in September 2017 and some funding is expected to come from developers. The safeguarding should mirror that included in the Vale of White Horse Local Plan Part 2, or be amended to ensure consistency. It is noted that these routes could contain archaeological deposits of such significance as to cause a constraint to development as set out in paragraph 139 of the NPPF. A programme of archaeological evaluation will need to be undertaken before this potential impact can be understood.

DIDCOT NORTHERN PERIMETER ROAD

83. The area safeguarded between Hadden Hill A4130 and Lady Grove is known as NPR3 – the third part of the Didcot Northern Perimeter Road at the eastern edge of Didcot. Funding has been achieved for this and work is commencing on detailed design.
84. Additional safeguarding has been included for widening along Lady Grove to the B4016. This would provide for widening should it be required in conjunction with an option for the Didcot-Culham River Crossing.

SCIENCE BRIDGE

85. Funding is being sought as part of the HIF Bid made in September 2017. The safeguarding mirrors that included in the Vale of White Horse Local Plan Part 1.

A4130 DIDCOT TO WALLINGFORD ROAD SAFETY IMPROVEMENTS

86. A relatively small area of safeguarding is proposed west of Brightwell-cum-Sotwell around the junction of the Wallingford Road. Developer funding has been sought towards these improvements and the County Council intends to carry out some realigning for safety purposes when funding allows. The scheme 'providing improvements to the A4130 between Didcot and Wallingford' is included in the County Council's LTP4.

SANDFORD PARK AND RIDE SITE

87. The County supports this safeguarding. This proposal for a new 'outer' Park & Ride site on the A4074 is consistent with that proposed in the Oxford Transport Strategy part of the County Council's Local Transport Plan 4.

DIDCOT CENTRAL CORRIDOR IMPROVEMENTS

88. This safeguarding is proposed to enable bus priority and other public realm and sustainable transport measures. The District Council is leading with work being done on the Didcot Garden Town project in respect of this.

ABINGDON SOUTHERN BYPASS

89. This area of safeguarding mirrors that contained in the Vale of White Horse Local Plan Part 1, with only a small part of the scheme within South Oxfordshire. The land is safeguarded to provide for the possibility of a major new road in this location should it become necessary and feasible. Advice from the County Council on archaeological assessment will need to be sought. Funding for such a road is not currently being sought as it is not identified as being required for proposed development in either the Vale of White Horse or South Oxfordshire.

BENSON, STADHAMPTON AND WATLINGTON BYPASSES

90. The safeguarding proposals have not been amended from that included in the Second Preferred Options. The proposals arose from Neighbourhood Plans in the case of Benson and Watlington, and from the Chalgrove Airfield developers in the case of Stadhampton. The potential need for these has been considered in the ETI Stage 2 work and our comments on this are set out later in this response.

Our concerns are primarily about the effects of these on the wider strategic network.

91. If the safeguarding proceeds, each area of safeguarding needs to be wide enough to enable such new routes to effectively provide for future traffic by diverting the relevant A or B road. Advice from the County Council on archaeological assessment will need to be sought, and the Stadhampton proposal is identified in an area of particular archaeological interest. A small amendment to the Watlington safeguarding map is likely to be required to reflect ongoing discussions with the site promoters. The Stadhampton safeguarding may need to be amended to better reflect what is required in the area.
92. Funding for such bypasses is not being sought by the County Council. The proposed safeguarding of these bypasses appears to be related either to local issues or to the effects of the development at Chalgrove Airfield. Funding would therefore logically come from those sources if it is found that the bypass proposals are necessary and do not divert traffic to cause unacceptable negative effects on other parts of the highway network. Additional funding may also be necessary for traffic calming on those parts of the villages where the A or B road has been diverted.

HARWELL STRATEGIC LINK ROAD AND SOUTHERN DIDCOT SPINE ROAD

93. Additional safeguarding is proposed for a Southern Didcot Spine Road. Our May 2017 response queried its omission at that stage and we now support its inclusion. Such a spine road is only required if there is development in this location, and would be funded by such development. There is no proposed site allocation in this area, but a development proposal has been scoped (P17/S3029/SCO) and it is understood that a planning application may follow.
94. The safeguarding for the Harwell Link Road mirrors that in the Vale of White Horse Local Plan Part 1. The link road is being constructed at present.

A4074/B4015 GOLDEN BALLS JUNCTION

95. Additional safeguarding to that included at Preferred Options to provide for an improvement to the roundabout at Golden Balls is included and is supported by the County Council as this is shown in the ETI as likely to be needed.

Detailed Comments on Evidence

INFRASTRUCTURE DELIVERY PLAN

96. There are a number of errors in the Infrastructure Delivery Plan (IDP) published as evidence supporting the Proposed Submission Local Plan. As a number of necessary infrastructure items are either missing or the indicative cost is too low,

this could give the impression that site allocations are more viable than they are in reality.

97. The County Council seeks that changes are made to the IDP as soon as possible to inform the Examination. It is noted that the IDP is meant to be viewed as a 'live document' able to be updated. We are happy to share data to help derive appropriate costs.
98. The IDP needs to be updated to reflect additional Evaluation of Transport Impacts (ETI) work that is deemed necessary. At the moment, the ETI cannot be relied on to have identified all the optimum transport mitigation measures needed for the proposed development allocations.
99. The IDP over-relies on the Sustainable Transport Study which does not adequately identify likely infrastructure improvements, as set out later in this response.
100. Some known proposals do not appear to have been referred to in the IDP, for example the proposed Sandford Park & Ride and the Didcot to Wallingford A4130 improvements. The IDP should be checked against the County Council's published Local Transport Plan 4 2016.
101. Reference to projects such as the Benson, Watlington and Stadhampton bypasses needs to be carefully reconsidered. These are proposals which are not being led by the County Council, and our concerns about these are stated elsewhere in this response. It is noted also that if these go ahead, then provision also needs to be made for related traffic calming of other roads through the villages.
102. Bus service improvements should be provided for in the IDP separately from walking and cycling route improvements. These are currently dealt with inconsistently from area to area.
103. It should be made clear that the IDP seeks only to list the forecast infrastructure requirements. The key rationale for the IDP should be to identify broad infrastructure needs for the purpose of assessing whether proposed allocations are viable. Additional infrastructure requirements may result from detailed evidence, such as Transport Assessments, associated with planning applications.

EVALUATION OF TRANSPORT IMPACTS

104. The Evaluation of Transport Impacts (ETI) work has been conducted too quickly and does not provide sufficient evidence for the County Council to make an informed decision on the transport impacts of the proposed allocations.
105. One of the main aims of the ETI is to help identify a package of highway improvements to ensure the Local Plan contributes towards the delivery of sustainable development. This has not been achieved as the ETI work, in

particular regarding mitigation, is not complete. This is clearly stated within the ETI, for example at paragraphs 4 and 5.

106. Regarding Chalgrove Airfield, the transport evidence to date does not sufficiently prove how the transport infrastructure to support this site can be delivered. If infrastructure to mitigate the impacts of growth does not come forward, Oxfordshire County Council will object when a planning application is submitted.
107. In particular, the delivery of proposed bypasses for Watlington, Stadhampton and Benson are extremely complex, involving a number of different development sites and landowners and will require the co-ordination of a number of different stakeholders. At this point in time, it has not been satisfactorily demonstrated to the County Council that these pieces of infrastructure can be delivered. Delivery of Stadhampton bypass, in particular, is of major concern. With Watlington and Benson, although there will be delivery challenges, sites are proposed to be allocated along the alignment of the proposed bypasses in neighbourhood plans to help pay for them. This is not the case for Stadhampton. The schemes are seen as very much development specific and do not have strategic importance. The County Council will not be held liable for delivering these routes and costs associated. Given the requirement for third party land, a robust business case would be required to ensure delivery, potentially via a compulsory purchase order.
108. Further work is required in relation to the Abingdon network and how this is performing. Given the proximity of Dalton Barracks and Marcham (in the Vale of White Horse) and Culham and Berinsfield (in South Oxfordshire), a cumulative impacts assessment in Abingdon needs to be conducted to inform the full impact. This work is underway but will not be available until after the Regulation 19 consultation has ended. The County Council is unable to comment meaningfully until it sees this additional evidence.
109. It is recognised that OSM is an Oxfordshire wide traffic model so it is difficult for it to exactly represent conditions at a micro scale. However, it would be useful to clarify certain elements and coding within the model and to understand flow forecasts. It seems to be under or over-representing traffic flows at certain locations. These include but are not limited to:
- A415 at Culham/Clifton Hampden
 - B4009/B480 (at Watlington)
 - B480 (towards Cowley)
 - B4015
 - A329
 - A40 (towards Headington)
 - New river crossing and Clifton Hampden by-pass
110. Transport impacts in areas outside the 'area of detailed modelling' in OSM have not been fully assessed. Discussions with neighbouring authorities have taken place regarding the sharing of data but further work is needed to assess transport impacts outside the area of detailed modelling.

111. There is no explanation to describe and justify how the various mitigation measures have been chosen and evaluated. Options appraisal is needed to ensure that the correct mitigation schemes have been chosen. Most mitigation has been proposed prior to meaningful assessment through ETI and promoted from the strategic site allocation at Chalgrove.
112. Paragraph 5 of the introduction states that more detailed work is on-going between SODC, OCC and others to review the local impacts of proposed developments and potential mitigation measures associated with growth. We welcome the opportunity to conduct further work on mitigation measures with SODC, but are concerned about the amount of work still to be done and the timescales associated with this to support SODC's Local Plan and Examination in Public.
113. Due to the strategic nature of the ETI, the assessment of transport impacts focuses on District wide impacts and impacts along particular key corridors. The impacts on other roads e.g. through villages, are not examined in depth. This has impacts on the assessment of mitigation scenario (a) for example in the Stage 2 ETI (the removal of non-funded infrastructure) as the impacts of the removal of Culham to Didcot river crossing and Clifton Hampden bypass on surrounding villages and local routes is not examined in the report. This lack of explanation downplays the importance of unfunded mitigation that has been removed from this scenario, in particular Culham to Didcot river crossing, as it does not explore the impacts on Culham and Clifton Hampden bridges and on nearby villages such as Long Wittenham and Sutton Courtenay and A4130 from Milton Interchange to Didcot. It is these links, in part, that the infrastructure is designed to mitigate.
114. In Paragraph 5.2.2, the forecast flow difference between Local Plan and Do Minimum show a slight reduction in trips along the M40 / A40 corridor in the PM peak. In this case (i.e. prior to the inclusion of any mitigation), the report states that this reduction is likely to be due to some of the traffic moving away from South Oxfordshire to other locations which may be more attractive in transport terms. This requires further explanation. The report also states that flows will increase along the B480, likely to be related to additional dwellings at Chalgrove and Watlington.
115. Paragraph 6.3.2 refers to flow impacts under mitigation scenario (b1) and states that traffic flows will reduce on the A40 and increase on the B480, likely to be due to Watlington and Stadhampton bypasses. We have reservations as to the validity of this assessment which therefore warrants further investigation. The impacts of proposed growth and mitigation on the A40 and B480 need to be examined in more depth, in particular the scale of changes and the reasons for them. The County Council would not support the delivery of new transport infrastructure which would lead to traffic diverting off the M40 /A40 corridor and onto the B480 as an alternative route to and from Oxford. The B480 is a B road and passes through a number of rural villages and should not be used as a substitute for an A road. Further work to examine the impacts of proposed mitigation measures for the Chalgrove Airfield strategic site is essential, in particular to assess the impacts on other roads and settlements in the area. This

needs to take place before OCC can support a strategic allocation at Chalgrove Airfield.

116. Paragraph 3.2 of the ETI Stage 2 explains that the results of the model show a mode shift from bus and rail to the car which suggests that transport accessibility may need to be considered further as part of the Local Plan. This demonstrates the importance of proposed allocations being able to provide good public transport to serve the sites, in order to provide opportunities and alternatives to the private car. This is especially relevant to places such as Chalgrove Airfield which is in a rural location and with relatively poor public transport accessibility, Berinsfield which benefits from public transport serving the A4074 but is too far for most to walk from the proposed development site, and Culham which has no existing bus service (although proximity to the rail station is a benefit). The Sustainable Transport Study does look at options for improving bus services in Oxfordshire, but further work is needed to ensure that the ideas presented are deliverable and commercially sustainable.
117. A further concern identified in the ETI is the alignment of the proposed Stadhampton bypass. The model shows that although such a Stadhampton bypass appears to help to reduce traffic travelling through that village, issues at Chiselhampton near the junction of the B480 and B4015 are not addressed.
118. It may be that additional or alternative proposals to mitigate transport effects from the proposed allocations are required. Some work was done within the ETI, for example to explore the need for a Nuneham Courtenay bypass. Although there are capacity issues identified on the A4074, a bypass at Nuneham Courtenay is shown to do little other than move the capacity issues towards Oxford, and therefore is correctly not proposed.
119. It has been suggested by the Homes and Communities Agency that Hollandtide Lane will be upgraded as part of the transport mitigation for Chalgrove Airfield. Improvements could help to redirect traffic travelling between Benson and Chalgrove Airfield away from other roads which would impact on villages. However, at this stage it is unclear what improvements are suggested, there is no safeguarding for widening in the Local Plan and the suggestion has not been modelled.
120. The impacts of identified new road proposals not being delivered before development commences is not examined. At the present time the Didcot-Culham River Crossing is not funded, although a bid for government funding was made in September 2017. It is assessed that the River Crossing is needed for development on the land adjoining the Culham Science Centre, and to some extent for development at Berinsfield. It is also needed to some extent for already committed development in Didcot.
121. There are parts of the highways network which are shown to be over capacity in the Local Plan scenarios but no mitigation has been tested or proposed as part of the ETI, e.g. A415, A40 on the approaches to Green Road roundabout, A4074 near Berinsfield/ Shillingford / Benson / Crowmarsh; Berinsfield (Fane Drive); A418 Aylebury Road in Thame; parts of the A4130 in Didcot. The reasons for not

seeking to mitigate impacts on the transport network in these areas needs to be provided; alternatively additional transport mitigation needs to be investigated to address these issues.

122. The general approach to highway network performance may not provide the best measure of localised junctions. It is at these key nodes where capacity issues exist. Further and more detailed work will need to be conducted as development sites progress. This should include appropriate modelling packages with robust traffic flow data including queue length surveys.

SUSTAINABILITY APPRAISAL

123. The rigour of the sustainability appraisal is questioned further to the soundness issues raised in the rest of this County Council comment.
124. With regard to transport, the sustainability appraisal does not adequately describe the public transport network.
125. The evaluations of Objective 6 relating to travel choice and reducing reliance on private car are questionable - all strategic sites are awarded top marks. There are clear genuine differences between the sites in this respect, for example sites adjacent to Oxford will have a far greater chance of sustainable bus route operation and more attractive cycling options due to shorter distances and provision of existing infrastructure, which will provide more genuine travel choices and less reliance on private car use than sites located in more remote areas (e.g. Harrington). This is not adequately evaluated. For sites that should score lower, unspecific or unproven interventions are given as reason for awarding top marks, for example:
- Chalgrove: Top score is awarded simply because the existing bus service provision to Oxford is expected to be improved. The appraisal does not mention the current lack of public transport in all other directions and the likelihood that such services may not be possible to provide on a sustainable commercial basis even with a large development. There is a significant chance the site will have a high level of car usage as a result and low level of genuine travel choice.
 - Harrington: Top score is awarded to this proposed development next to a motorway junction with no significant existing public transport. This is based simply on unproven potential for a Park & Ride site. There is a significant chance the site will have a high level of car usage as a result and low level of genuine travel choice.
 - Lower Elsfield and Wick Farm: The reasonably close provision of Oxford Parkway station will make driving to it very attractive. However, the proximity of the site to Oxford will make bus operation commercially less costly (therefore more sustainable) and cycle use more attractive when compared to a location remote from Oxford.
 - Thornhill: A site next to an existing transport hub will provide attractive public transport choices.

- South of Grenoble Road and Northfields: The location next to Oxford makes a commercially sustainable bus operation more likely and cycle use more attractive, providing genuine travel choices and less reliance on car usage.
- Culham sites: There is no existing bus service and a poor train service, therefore sustainability is based on improving these considerably.

SUSTAINABLE TRANSPORT STUDY

126. The Sustainable Transport Study for New Developments, September 2017, provides an initial look at the sustainable transport challenges associated with some of the additional sites. The study does not comprehensively identify all of the issues or interventions required. This is recognised in the Executive Summary itself. Furthermore, some of the proposals put forward are not supported by adequate evidence and may not be taken forward.

127. Considerable further work will be required to identify the necessary sustainable transport interventions required for each site. Key issues with the study include:

- An inadequate information base. For example the existing bus route along the A4074 which stops at Benson and the train station at Cholsey appear not to be recognised. The County Council is already proposing to increase the frequency of the bus route along the A4074 (X39, X40) which serves villages such as Benson. There is also a current bus route between Benson, Wallingford and Cholsey providing a connection to the train station (136).
- There are recommendations for bus routes which are unlikely to be commercially sustainable.
- The quotes of costs for bus improvements are provided on an annual basis, implying ongoing subsidy. This is not the way development related bus route improvements are procured - they are procured on a declining subsidy basis ending in a commercially sustainable service that requires no ongoing subsidy.
- There is no acknowledgement of the infrastructure required for shuttle buses (i.e. space to fit two buses in a layby).
- The Berinsfield to Cowley or Oxford bus and cycle routes are not recommended, despite the importance of the Oxford area for education, employment and services for Berinsfield.

STRATEGIC HOUSING AND ECONOMIC LAND AVAILABILITY ASSESSMENT

128. The Strategic Housing and Economic Land Availability Assessment (SHELAA) has not been reviewed in detail, but it is noted that in some cases it assesses sites positively although they are not proposed for allocation. This does not in any way restrict comments from the County Council in future should sites be proposed for allocation or planning applications made. It is also noted that in some cases the SHELAA assessment is that sites are not suitable for development and the County Council may disagree with that. The County Council's Property response which includes comments disagreeing with the analysis of sites 891 and 892 is sent separately.

Attachment 1

SITE ALLOCATION POLICIES

The Site Allocation policies need to be reviewed for consistency to ensure that they are effective. We seek the following amendments, noting that there may be more amendments needed. **These amendments are suggested separately from any wider concerns about the allocations set out in the main text of our response.**

Land Adjacent to Culham - Policy STRAT7:

- i) - Proposals for development will be expected to comply with a Comprehensive Development Framework SPD and contribute to infrastructure in the manner set out in that Framework which will require all phases of development to contribute fairly towards the joint responsibilities for transport, education, open space and other infrastructure.
- ii) – transport mitigation measures such as a significant contribution towards a new Thames road crossing between Culham and Didcot Garden Town and the Clifton Hampden bypass.

Berinsfield - Policy STRAT8:

- i) - ~~deliver a scheme in accordance with an agreed comprehensive masterplan and strategy for the regeneration of Berinsfield~~ a Comprehensive Development Framework SPD and contribute to infrastructure in the manner set out in that Framework which will require all phases of development to contribute fairly towards the joint responsibilities for transport, education, open space and other infrastructure.
- ii) - meet the entire cost of the necessary regeneration package, including social, environmental, recreation, housing and public services infrastructure
- iii) – transport mitigation measures
- iv) – improvements to the cycling and walking network, including to an off-road route between Berinsfield and the edge of Oxford largely following the line of the Roman road.
- v) - sufficient additional education capacity, likely to be two primary schools on site and a contribution to a new secondary school
- viii) – ~~Provide for public transport facilities and connections within the village and to and from the surrounding area~~ by pump-priming new and improved services

Chalgrove Airfield – Policy STRAT 9

- x) Provide for public transport by pump-priming new and improved services



South Oxfordshire Local Plan 2033
 Publication Version
 Representation Form

Ref:

(For official use only)

Name of the Local Plan to which this representation relates:

South Oxfordshire
 Local Plan 2033

Please return by 5pm on Thursday 30 November 2017 to: Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@southoxon.gov.uk

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal Details*

*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.

2. Agent's Details (if applicable)

Title	Mrs	
First Name	Susan	
Last Name	Halliwell	
Job Title (where relevant)	Director for Planning and Place	
Organisation representing (where relevant)	Oxfordshire County Council	
Address Line 1	County Hall	
Address Line 2	New Road	
Address Line 3	Oxford	
Postal Town	Oxfordshire	
Post Code	OX1 1ND	
Telephone Number		

Email Address

southandvale@oxfordshire.gov.uk

Sharing your details: please see page 3

Part B – Please use a separate sheet for each representation

Name or organisation: Oxfordshire County Council

3. To which part of the Local Plan does this representation relate?

Please see attached

4. Do you consider the Local Plan is: *(Please tick as appropriate)*

4. (1) Legally compliant

4. (2) Sound

4. (3) Complies with the Duty to Cooperate

5. Please provide details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to Cooperate. 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 Cooperate, please also use this box to set out your comments.

Please see attached

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above. (NB Please note that any non-compliance with the Duty to Cooperate 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.

Please see attached

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.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

As the County Council for Oxfordshire, we should attend to explain our comments and help the Inspector address any queries in respect of issues the County has responsibility for.

Please note the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

Signature:

Date:

Sharing your personal details

Please be aware that, due to the process of having an Independent Examination, a name and means of contact is required for your representation to be considered. Respondent details and representations will be forwarded to the Inspector carrying out the examination of the Local Plan after the Publicity Period has ended. This data will be managed by a Programme Officer who acts as the point of contact between the council and the Inspector and respondents and the Inspector.

Representations cannot be treated as confidential and will be published on our website alongside your name. If you are responding as an individual rather than a company or organisation, we will not publish your contact details (email / postal address and telephone numbers) or signatures online, however the original representations are available for public viewing at our council office by prior appointment. All representations and related documents will be held by South Oxfordshire District Council for a period of 6 months after the Local Plan is adopted.

Would you like to hear from us in the future?

I would like to be kept informed about the progress of the Local Plan

I would like to be added to the database to receive general planning updates

Please do not contact me again

Further comment: Please use this space to provide further comment on the relevant questions in this form. **You must state which question your comment relates to.**

Please see attached.

Alternative formats of this form are available on request. Please contact our customer service team on 01235 422600 (Text phone users add 18001 before you dial) or email planning.policy@southoxon.gov.uk

Please return this form by 5pm on Thursday 30 November 2017 to: Planning Policy, South Oxfordshire District Council, 135 Eastern Avenue, Milton Park, Milton, Abingdon, OX14 4SB or email planning.policy@southoxon.gov.uk