

**From:** Blake, Patrick [REDACTED]  
**Sent:** 18 February 2019 14:01  
**To:** Planning Policy South  
**Cc:** Planning SE; Townend, Zoe; Strongitharm, Glen; Ginn, Beata  
**Subject:** CONSULTATION ON THE SOUTH OXFORDSHIRE DISTRICT COUNCIL EMERGING LOCAL PLAN 2011-2034 (FINAL PUBLICATION VERSION 2ND)  
**Attachments:** 190211 - SODC Local Plan Review\_Issued.docx

Dear Planning Policy Team

Thank you for consulting Highways England in relation to the South Oxfordshire District Council (SODC) Emerging Local Plan 2011-2034 (Final Publication Version 2nd).

Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such, Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. In this case Highways England's interests relate to the potential impact of development on the M40 and A34.

Overall, in accordance with national policy, we look to SODC to promote strategies, policies and land allocations that will support alternatives to the car and the operation of a safe and reliable transport network. We would be concerned if any material increase in traffic were to occur on the SRN because of planned growth within and outside South Oxfordshire district, without careful consideration of mitigation measures. It is important that the Local Plan provide the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.

When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. We will support a local authority proposal that considers sustainable measures which manage down demand and reduce the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort. Proposed new growth will need to be considered in the context of the cumulative impact from already proposed development on the M40 and A34.

This correspondence follows on from our letter dated 27 November 2017, produced in response to the earlier 2017 South Oxfordshire District Council Local Plan 2033 for which our comments remain. Only new/amended policy items are considered below.

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

#### **POLICY STRAT7: Land at Chalgrove Airfield**

It is noted that Policy STRAT7 (previously Policy STRAT9), the site area of which is 255 hectares, will be developed to deliver approximately 3,000 new homes with at least 2025 to be delivered within the plan period, 5 hectares of employment land, 3 pitches for Gypsies and Travellers and supporting services and facilities (including two 2 form entry primary schools including early years provision (each 2.22ha), one new 8 form entry secondary school with sixth form (10.55ha) which incorporates a relocation for Icknield school from Watlington and off-site contributions to Special Educational Needs (SEN)).

The policy also advises that proposals to develop Chalgrove Airfield will be expected to deliver land safeguarded for the future operations of Martin-Baker to include a re-aligned runway to be designed in line with Civil Aviation Authority (CAA) standards.

The policy has also been expanded to include the expectation that "improvements to highway infrastructure" will be facilitated. This policy addition is welcomed by Highways England and we look forward to working with the LHA and LPA as proposals are developed.

#### **Policy STRAT8 – Culham Science Centre**

Highways England notes that Policy STRAT8, the site area of which is 73 hectares, states that proposals for the redevelopment and intensification of the Culham Science Centre will be supported where this does not have an unacceptable visual impact. Also in combination with the adjacent strategic allocation (Policy STRAT9) this site will deliver at least a net increase in employment land of 7.3 hectares (with the existing 10 hectares of the No.1 site retained but redistributed across the two strategic allocations). The exact siting and phasing of the employment development must be agreed through the master planning and subsequent planning application process.

#### **Policy STRAT9 – Land adjacent to Culham Science Centre**

Highways England notes that the wording of policies STRAT8 and STRAT9 has been significantly updated with the two sites now proposed to deliver "at least a net increase in employment land of 7.3 hectares (with the existing 10 hectares of the No.1 site retained but redistributed across the two strategic allocations)".

It is also noted that the previous version of Policy STRAT7 stated that "the number of homes to be built on the site in advance of the implementation of the Culham Bridge will not exceed 750". This statement has been amended to state that "it is expected that only a limited number of homes will be delivered prior to the delivery of the planned transport infrastructure." It is noted that exact numbers and phasing are to be determined based on further evidence, taking into account the requirements of Policy TRANS4 and consultation with the Highways Authority, with a supplementary planning document being produced.

Highways England is supportive of this approach and the production of a supplementary planning document and welcomes the opportunity to contribute to this. Given the potential impact of these sites on the nearby A34, it is important to determine how any adverse impacts on the safe and efficient operation of the SRN will be managed and mitigated.

#### **POLICY STRAT10: Land at Berinsfield**

Highways England notes that Policy STRAT10 has been updated with a residential allocation of up to 1,700 homes within the plan period. There are also new allocations of 5 hectares of employment land.

The number and phasing of homes to be permitted and the timing of housing delivery linked to the planned infrastructure needs to be informed by further evidence as per the requirements of other policies in the plan, including Policy TRANS4. We understand that this will be agreed (and potentially conditioned) through the planning application process, in consultation with the relevant statutory authority.

#### **POLICY STRAT11: Land south of Grenoble Road**

Highways England notes that Policy STRAT11, the site area of which is 153 hectares, will be developed to deliver approximately 3000 new homes, 1700 within this Plan period, provide approximately 10 hectares of employment land extending the Oxford Science Park, a Park and Ride site adjacent to the A4074 and supporting services and facilities (including the likelihood of an on-site primary school provision of two 2-form entry primary schools, 10.55 hectares for a secondary school with an initial capacity of 600 students and this should have the capability to expand to meet future needs and appropriate contributions towards Special Education Needs (SEN)).

The number and phasing of homes to be permitted and the timing of housing delivery linked to the planned infrastructure needs to be informed by further evidence as per the requirements of other policies in the plan, including Policy TRANS4. We understand that this will be agreed (and potentially conditioned) through the planning application process, in consultation with the relevant statutory authority and will include Highways England given the site's size and proximity to the A34.

#### **POLICY STRAT12: Land at Northfield**

Highways England notes that Policy STRAT12, the site area of which is 68 hectares, will be developed to deliver approximately 1,800 new homes and supporting services and facilities (including new 3-form entry primary school and appropriate contributions towards other or secondary school and Special Education Needs (SEN) within the plan period.

The number and phasing of homes to be permitted and the timing of housing delivery linked to the planned infrastructure needs to be informed by further evidence as per the requirements of other policies in the plan, including Policy TRANS4. We understand that this will be agreed (and potentially conditioned) through the planning application process, in consultation with the relevant statutory authority and will include Highways England given the site's size and proximity to the A34.

#### **POLICY STRAT13: Land North of Bayswater Brook**

Highways England notes that Policy STRAT13, the site area of which is 112 hectares, will be developed to deliver approximately 1,100 new homes and supporting services and facilities (including a 2-form entry primary school including early years provision, appropriate contributions towards an off-site secondary school and Special Educational Needs (SEN) within the plan period.

The number and phasing of homes to be permitted and the timing of housing delivery linked to the planned infrastructure needs to be informed by further evidence as per the requirements of other policies in the plan, including Policy TRANS4. We understand that this will be agreed (and potentially conditioned) through the planning application process, in consultation with the relevant statutory authority and will include Highways England given the site's size.

#### **POLICY STRAT14: Land at Wheatley Campus, Oxford Brookes University**

Highways England notes that Policy STRAT14, the site area of which is 22 hectares (Existing development footprint: 12 hectares), will be developed to deliver at least 300 new homes within the plan period. Development should be focused on the previously developed and eastern part of the site. In general, development on the undeveloped, western part of the site will not be considered appropriate.

This policy also advises that existing sports facilities should be retained or replaced within the development or, where this is not achievable because of site constraints, replacement facilities should be provided close to Wheatley or Holton to ensure that there is no local deficit of quantity or quality created by the redevelopment of the site.

#### **POLICY TRANS1a: Supporting Strategic Transport Investment across the Oxford to Cambridge Expressway**

As per our previous response, Highways England would like to continue working with SODC to “develop possible schemes to address capacity constraints on the A34 and... the planned Oxford to Cambridge Expressway”. This will contribute to ensuring the efficient running of the SRN. In addition, Highways England agrees that “further clarity on any preferred option(s) are required from central government before any conclusions can be drawn on links to proposed development” and that “any impacts or benefits for South Oxfordshire will depend on the route of any new road”.

#### **POLICY TRANS1b: Supporting Strategic Transport Investment**

We are supportive of this policy, particularly section v, “ensure that the impacts of new development on the strategic and local road network, including the A34 and M40, are adequately mitigated.”

#### **Policy TRANS7: Development Generating New Lorry Movements**

Whilst we are generally supportive of this policy, we suggest that reference is made to the requirement for Transport Assessments and Travel Plans to support large scale developments such as freight distribution depots and the importance of the trips being accommodated on both the local and strategic road network.

#### **INFRASTRUCTURE DELIVERY PLAN (IDP) - January 2019**

The January update to the previous IDP from October 2017 sets out an updated infrastructure schedule which lays out the key infrastructure requirements on which the delivery of the plan relies. It assesses the suitability of existing infrastructure provision and identifies the infrastructure investment required to support growth and meet the needs of current and future residents and businesses.

We note that throughout the IDP there is no reference to Highways England or the SRN which we find surprising given the outcomes of the Stage 3 Evaluation of Transport Impacts produced. For example, in relation to the Chalgrove Airfield allocation we would expect to see M40 junction improvement references as follows.

## **CHA25 – CHA29 Infrastructure Schedule Chalgrove Airfield**

Transport references CHA25 to CHA29 make no comment regarding transport infrastructure improvements to the SRN. As per the attached South Oxfordshire model review section 8 summary point 5, we note the potential for impact along M40 junctions associated with this allocation.

### **Appendix 1.2 Trajectories for Strategic Allocations**

The table illustrates that only two of the proposed strategic sites are expected to deliver 380 dwellings in total before 2024/2025 and therefore the strategic allocations cannot be relied upon in isolation to provide a suitable five-year housing supply as in line with NPPF. We note the significant number of existing committed developments (11,362 of a total 28,465 dwellings required) that are expected to provide the immediate five-year land supply are outlined in table 5c of the Local Plan.

### **TRANSPORT TOPIC PAPER - October 2017**

All previous Highways England comments remain unchanged.

### **SUSTAINABLE TRANSPORT STUDY - July and September 2017**

All previous Highways England comments remain unchanged.

### **SUSTAINABILITY APPRAISAL - December 2018 and SA ADDENDUM - January 2019**

It is noted that this document has been updated since the previous Local Plan consultation and now reflects the Final Publication Version of the SODC Local Plan. All previous Highways England comments remain unchanged.

### **EVALUATION OF TRANSPORT IMPACTS**

Please see the attached Technical Note (Annex A) setting out comments from Highways England's consultants about the SODC Local Plan: Evaluation of Transport Impacts: Stage 3 Development Scenarios and Mitigation Testing Report (January 2019).

It is noted that transport impact analysis summarised in this Stage 3 report has been used to inform decision making on the local plan development. However, it is not clear from the modelling reports what the impacts of each of the individual sites selected are on the strategic road network as there is only commentary on the Do Minimum scenario. It is important that the merits of each site, relative to others, are clearly explained and that the Local Plan document is able to respond flexibly to alternative potential strategic sites as appropriate.

I hope this is helpful and I look forward to continued involvement with the development of the South Oxfordshire District Council Local Plan.

Yours sincerely

**Patrick Blake, Area 3 Spatial Planning Manager**

Highways England | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

Web: <http://www.highways.gov.uk>

GTN: 0300 470 1043

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