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Witney Oxford Transport

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Salt Cross Garden Village Area Action Plan Publication Stage Representation

The document to which this representation relates is the pre-submission draft
Area Action Plan.

Presented by: Maurizio Fantato, Chairman, WOT - Witney Oxford Transport
Reg address: 25 Pococks Close, Bampton, OX18 2JY
Email: info@witneyoxfordtransport.org.uk
Tel: 07500 947599

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Section 3: Representation made by Witney Oxford Transport on: POLICY

Section 4: We accept the plan is legal, and complies with the duty to cooperate. However we do not believe it to be sound, for the reasons stated in our submission hereinafter.

Section 5: *Please give details of why you consider the Area Action Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Area Action Plan or its compliance with the duty to cooperate, please also use this box to set out your comments*

These comments relate to the unsound nature of Policy 15 in its reliance on a road-only solution to travel problems on the A40 corridor. The wording of the bullet points needs adding to, in brief, as we set out below. This is to allow for rail to be recognised as an option for further consideration as part of the A40 Corridor Improvements.



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The reasoning for this includes:

1) **It is settled policy in OCC Connecting Oxfordshire Volume 3 Rail strategy** that

“The county council will retain the option of a rail line to Witney as a longer-term aspiration in its A40 Strategy, and will pursue opportunities to realise the aspiration with Network Rail and train operators in the future”.

By ignoring the rail option and only supporting the road option the AAP is undermining this strategy. It is not sound for an AAP to undermine a strategic policy in a way which could put a cap on further housing and other developments along this corridor.

2) **The AAP is unsound in so far as it declares that this will be a “zero-carbon” development.**

AAP s. 5.42 reads: “The Garden Village is an exemplar net-zero carbon, energy positive development which meets the challenges of climate change head-on.”

No car-based development could be carbon-free in the foreseeable future as road vehicles will still be using fossil fuels long after 2040 - the year that fossil-fuel vehicle sales should end (or 2030 if a more ambitious target is set).

To help meet its own carbon-free commitment and national carbon reduction policy obligations the AAP should, as a minimum, hold open the option of considering rail-based alternatives because zero-carbon rail transport is currently the only way to ensure the AAP is deliverable.

3) **Oxfordshire and West Oxfordshire DC policy and AAP have been superseded by HM Government’s policy and announcement on Reversing Beeching and re-opening railways.** Since the drafting of the AAP funding is now available and can be applied for imminently, under the Restoring Your Railway Ideas Fund and other linked funds. There are many examples (e.g. the Borders Railway in Scotland and the “Robin Hood Line” in Nottinghamshire/Derbyshire) where very successful rail reopenings have taken place where it was previously felt impossible. Locally, the resounding success of even just the first, Western Phase of the East/West Rail, between Oxford via Oxford Parkway and Bicester, and on to London Marylebone, is proof positive of the maxim ‘build it and they will come’.



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It is therefore unsound to proceed with only inadequate transport proposals when there are external funds available to explore and develop sustainable transport options.

- 4) **The AAP misleadingly states that Hanborough Station is 1.8 miles from the AAP area.** It may well be from the north side of the area, but in reality, for many of the new residents a journey of over 3 miles would be required which is unrealistic for walking to commute to the station, is a long cycle for many people and, by virtue of both distance and the very characteristic of Lower Road, is far more likely to be driven.

This contradicts the stated garden village principles (s. 2, 4, 8 Garden Village Principles). Having to drive across the countryside to another town to access sustainable transport is not a basis for an exemplar green village.

s. 8.11 states:

“Walking and cycling must be at the heart of all design decisions - from strategic master planning of the site through to the design of individual homes. This will support a reduction in reliance on the car for those living and working at Salt Cross, in turn bringing a range of benefits including improved physical and mental health, a better quality of life, an improved environment and increased productivity”.

- 5) **The reliance on bus services which currently do not exist is unsound** as there is no evidence that a garden village of only 2200 new homes (5,459 est. population) could support the proposed 20-minute frequency bus service, particularly as the strategic focus is on bus improvements on the A40 corridor which is in the opposite direction from Hanborough. Priority is given to walking and cycling for local journeys. Unless the s.106 requirement includes a subsidy in perpetuity there is no way to ensure that bus services continue to operate (other than a long-term subsidy from Oxfordshire County Council which has not been secured).

The congestion at Hanborough is already a recognised problem and the scale of improvements there is dependent on funding from sources that the AAP has no control over. It is also subject to the preparation of an SDP (the outcome of which is unknown) and national investment decisions yet to be taken regarding the North Cotswold line. We fully support the proposals for improving the rail offer and connections to Hanborough, but it is only part of the provision needed. We also note that the Stantec June 2020 Transport Assessment does not believe that a regular bus connection to Hanborough is viable and this



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has been accepted by Oxfordshire County Council. (s. 9.6.20).

There is no sound sustainable transport policy proposed for journeys beyond the Garden Village. So the AAP is internally inconsistent and unsound on that basis.

- 6) Finally, **since the policy context for the AAP was developed, Oxford has become a greater priority for rail investment.** East-West Rail is now under construction beyond Bicester to Bedford (enabling London-avoiding orbital journeys by rail) and cross-Oxford routes, including the reopening of the freight-only Cowley branch to passenger services, are being prioritized with the so-called 'Metro-isation' of routes across Oxford now a potential reality (submitted by Network Rail to HM Government as part of "Project Speed" in August 2020).

The Oxford – Eynsham – Witney – Carterton route, whilst not yet an agreed proposal becomes very much a reality for a western extension of an Oxford Metro (unlike the North Cotswold line which misses most of the major housing areas and proposed developments). **Both 'arms' of an Oxford Metro – to Cowley and via Eynsham westwards – are therefore entirely consistent with the DfT's principal criterion for Restoring Your Railway Ideas Fund** on the principle of "restoring lost rail connections to communities" – like the bids which are now in formulation.

Our representation is not intended to propose any particular solution – we simply seek to have wording amended to reinstate rail as a consideration for the A40 corridor in accordance with OCC's rail strategy. We have a presentation which we can show to demonstrate how much this matter has progressed since the AAP was prepared.

Section 6: *Please set out what modification(s) you consider necessary to make the Area Action Plan legally compliant or sound, in respect of any legal compliance or soundness matters you have identified at 5 above. You will need to say why each modification will make the Area Action 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*

We propose a single modification to the wording of **Policy 15 A40 corridor improvements:**

Add an additional bullet point which reads:

"Additionally or alternatively to contribute to further development of a rail-based option for the corridor through s106 or otherwise".



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As stated above, at present the AAP is unsound as it seeks a “zero-carbon development” but is dependent on sustainable transport links that have not been approved, cannot be sustainably secured in planning terms, and would undermine the proper evaluation of sustainable options for the A40 Corridor.

Since the AAP was drafted, the UK Government has committed to statutory climate change targets and to funding the investigation and development of railway reopening proposals.

It is already Oxfordshire County Council policy that the Oxford-Eynsham-Witney corridor is a longer-term aspiration. We also note that the Stantec June 2020 Transport Assessment is clear that there are many uncertainties and that flexibility in the Transport Strategy is essential (s10.2.2).

Therefore, to make the AAP sound, consideration of the rail options must be included at this stage. There is already provision for a park and ride facility and corridor improvements (part of Grosvenor’s Oxfordshire Garden Village Outline Planning Application 2020) so a rail option is still worthy of consideration. It is fully accepted that further consideration may mean that a rail link cannot be delivered as part of this process, **but the proper, sound planning of the area requires this wording amendment so that the option is not prematurely foreclosed without proper investigation.**

Sections 7 and 8: *If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:*

We are proposing that potential developer support for the rail option is kept open for consideration. There will be many questions as to how this can be done, benefitting (and not adversely affecting) the rest of the AAP and we have a presentation and a range of up to date information that needs to be scrutinised to be fully understood. We believe that parties would understand and could agree with our proposed amendment if we are able to present it and subject it to questioning at the hearing.

The written submission format does not sufficiently allow us to do this or enable us to leave the Inspector with the most up-to-date information before deliberating on recommendations to the Secretary of State.

We are therefore seeking a modification of the AAP, considering it necessary to participate in a hearing session.