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1st December 2025

By email only: areamovementandplacestrategies@oxfordshire.gov.uk

Attn: Tom Wilkins

Movement and Place Strategies Technical Lead - South and Vale
Oxfordshire County Council
County Hall
New Road
OXFORD
OX1 4ND

Dear Mr. Wilkins,

Science Vale Movement and Place Plan - Response of Oxford Bus Group

Oxford Bus Group is pleased to submit its comments and observations on the Science Vale Movement and Place Plan.

The Oxford Bus Group comprises the City of Oxford Motor Services Ltd. trading as Oxford Bus Company ("OBC"), Thames Travel (Wallingford) Ltd. ("Thames Travel"; "TTW") and two other companies operating within the plan area: Pulhams and Sons (Coaches) Ltd. ("Pulhams") and Carousel Buses Ltd. ("Carousel"). The former mainly operates in West Oxfordshire and the latter has a small presence in the Plan area, but mainly operates in Buckinghamshire.

These four companies are together run as part of Go-Ahead Group's UK Bus interests. Collectively, Oxford Bus Group is the largest provider of public bus services in Oxfordshire. Our businesses, principally Oxford Bus Company and Thames Travel, run the vast majority of all scheduled bus mileage in South Oxfordshire and the Vale of White Horse, as well as in the adjoining City of Oxford. This includes virtually all the services operating in the Science Vale Movement and Place Plan ("MaP Plan") area, and links beyond its boundaries to, among other places, Abingdon, Oxford, Reading, Newbury, Faringdon, Wallingford and Henley-on-Thames.

We understand this is a daughter document to the adopted Local Transport and Connectivity Plan ("LTCP5"). Its principal purposes are not entirely explicit. However, the published draft sets out a locality specific portrait of transport challenges and policy objectives, and then outlines a series of committed, potential and possible areas of interventions to address these. This creates a single up-to-date synopsis of anticipated transport projects and studies.

It is the first such since the Science Vale Transport Strategy ("SVTS") which sat within the Framework of "Connecting Oxfordshire" which represented Local Transport Plan 4 ("LTP4"). It was also an important element of the evidence supporting the Vale of White Horse Local Plan Part 1 2031, its subordinate Part 2, and the South Oxfordshire Local Plan 2035. This document replaces SVTS in the light of much more ambitious current transport policy set out in LTCP5.

The draft recognises that a considerable number of schemes in SVTS have been implemented, or are close to implementation. Within SVTS was a comprehensive Bus Strategy prepared in 2016-17.

OBC is of the strong view that broadly speaking, it remains vital to supporting the very high level of employment and population growth committed in the adopted Local Plans, that these interventions are implemented as far a possible as envisaged.

Among the actions taken since 2018 in support of plan-led growth, a notable one is the progressive implementation of major and ongoing enhancements to bus frequencies and connectivity across Science Vale, to a great extent pursuant to the Science Vale Bus Strategy. However, a number of improvement initiatives have gone substantially above and beyond this. These have been achieved through exceptional levels of collaboration and co-investment between the County – through application of developer funding and a certain level of Bus Service Improvement Plan support – bus operators, of which we are by far the principal player, and key Science Vale stakeholders, in particular the University of Oxford, MEPC Milton Park, and Harwell Science and Innovation Campus.

January 2021 was a key date at which point a long-established private shuttle bus service between Didcot Station and Milton Park was incorporated into a consolidated and improved public bus offer funded by a release of substantial developer funding. Alongside this, park employees living in Didcot, and not just rail commuters, could also benefit from annual travel to the Park for £20, in effect an administrative fee. Since that point, bus use to the park has more than tripled, and the bus mode share now exceeds 25%.

This is a major success story, of national note.

Further steady improvements have taken place subsequently. This includes:

- An hourly fast service from Didcot and Harwell to Newbury running non-stop along the A34 (X34) initiated in July 2024. This is the first time in decades that this inter-urban and inter-regional link has been offered.
- Uplift of the fast X32 service between Oxford, Milton Park and Didcot on the A34 to every 20 minutes taking effect on August 31st 2025.

The vast majority of the improvements set out in the SV Bus Strategy have thus been implemented. The most significant future uplift yet to be put in place is a frequency enhancement to North East Didcot, currently served by X36 every 30 minutes, and introduction of a Sunday service. This requires, among other things, bus stops to be installed in line with planning commitments on the route, by the County Council.

We are thus rather nonplussed by comments made in the local baseline description of the bus offer about limited bus service connectivity and low frequency.

Frequencies of 15 minutes or better, mentioned in the document, are generally restricted to intense operations running entirely over relative short distances within large urban areas. Within Oxfordshire, outside Oxford itself, only Banbury represents such a situation. The geography of

Science Vale is entirely different. The largest town of Didcot, while very fast growing, currently extends only a maximum of about 3km from the town centre in any direction. The majority of the urban area is within close walking and cycling distance from the station and town centre. This significantly truncates the demand for local bus journeys wholly within the town.

The network is therefore largely inter-urban in nature and the frequency of services reflects this. Only one inter-urban corridor in the County runs more frequently than every 15 minutes - S1 in West Oxfordshire - though S6 between Oxford and Swindon through the Western Vale has at peak times in the past. Bus frequency needs to be viewed in geographic context. The generalised journey time on longer inter-urban journeys is less sensitive to frequency than in urban areas where bus trips are generally less than 3 miles.

Several routes run in the MaP Plan area every 20 minutes:

- Thames Travel X40 Oxford-Berinsfield-Wallingford-Reading
- Thames Travel X32 JRH-Oxford-fast- Didcot-GWP
- Stagecoach S9 Oxford-Grove-Wantage – pending Botley Road reopening

In addition, there is an every 15 minutes headway provided on the key Didcot Parkway – Harwell Campus link through a combination of two every 30 minutes services (X34 and X35); and up to 10 buses per hour operating on the link between Didcot Parkway station and MEPC Milton Park.

None of the towns in the MaP Plan area are of a size sufficient to sustain local town networks. This normally demands a population of at least 60,000 and a significant proportion of the population living over 2km from the town centre. In Didcot, Bus frequency every 15 mins is offered by the X34/X35 combined to Great Western Park (“GWP”) which is the main town service, but this route group also performs the key local link between Didcot and Harwell Campus. The County Council had always envisaged the potential uplift of the NE Didcot service X36 to every 15 minutes, but as mentioned above, the business case for this demands significant infrastructure to be in place, and evaluation as to its financial sustainability having regard to current and foreseeable levels of use.

Exceptionally strong and sustained patronage growth has taken place since 2019, from the service improvements and partnership working described above. It is unclear when the JtW data included in the plan refers to, and what is its source. We would say that if 2011 Census data is used then it describes a very different situation indeed, in terms of both supply and use of bus services is concerned, and thus it should no longer be considered valid.

Bus services in Science Vale carry a number of brands and liveries. The X40 “River Rapids” stands somewhat apart from the majority of the MaP Plan area network touching only Berinsfield. A substantial level of financial support from key stakeholders, including MEPC at Milton Park and HSIC is reflected in dedicated liveries. It must be emphasised that partnership operation of services to these key destinations has seen remarkable impact in terms of service use, indeed, in the case of Milton Park, spectacularly so, and the dedicated liveries have helped to achieve this through projecting an air of authenticity onto the public transport offering to these major facilities.

A number of statements are made in the document on pp 14-15, regarding the need for a single brand. We are unclear what empirical evidence exists for the assertions made. Swindon does

not have a single unified brand, as the MaP Plan text states; indeed it never has – with two main local operators and several smaller incoming operators. It should be recognised that nearly all buses operating on routes in the Science Vale operate beyond it. A local unified brand covering just Science Vale is therefore demonstrably impractical.

The growth of bus connectivity and frequency has been such that Didcot Station Interchange, which was only constructed relatively recently, has already reached its practical capacity. We have been highlighting this to officers for some time. A pair of stops incorporating lay-bys to the south side of Station Road remains an important aspiration, to be delivered by allocated redevelopment sites adjacent. The first of these can be delivered by committed proposals for the site in Homes England control. However, longer term, even this is unlikely to be sufficient. Maximising station and cross-town connectivity, and unburdening the station forecourt, is likely to require further west-bound stands at the Station.

In terms of bus-rail interchange elsewhere in the MaP area, Culham Station is the only other site of note at this stage. Interchange between a limited number of stopping rail services, and the 45, which also runs only approximately every hour during the day, means the actual level of practical interchange is minimal at this time. The rail station is also not currently designed to allow buses to permeate sufficiently near to the station apron to facilitate efficient interchange.

In time, major bus service improvements can be expected to take place between Didcot, Berinsfield and Cowley associated with the delivery of the strategic employment and residential development at Culham, and the HIF1 highways package including the new Thames Bridge. This will serve to make opportunities for bus-rail connectivity more meaningful, though these still will be at a fraction of the level that takes place at Didcot.

Planned Infrastructure Delivery

The draft MaP Plan explicitly aligns to the draft South Oxfordshire and Vale of White Horse Joint Local Plan 2041 ("JLP"). This was submitted for examination to HM Planning Inspectorate in December 2024. Independent Examination began, but has been suspended. Serious concerns have been raised about Duty to Co-operate by the Inspectors. This has not been accepted by the planning authorities and formal correspondence is ongoing. It is unclear, even if the Examination is resumed, that the draft Plan will progress to adoption, given the very wide range of concerns about soundness raised by representors, that have yet to be covered in hearings sessions.

The JLP sought to roll forward current allocations to cover needs for a further five years, based on a substantially lower assessment of local housing need that prevailed for a brief period under the former Conservative administration.

It is certain that under the transitional arrangements for plan-making, that a new local plan will need to be prepared immediately even if the JLP progresses. This will need to accommodate a substantially higher development requirement for the plan area, even if it is accepted that the non-delivery of any homes to meet Oxford's needs in the 2021-2031 period is justified as being "written off". This being the case, the MaP Plan will no doubt need review to ensure that the mobility needs arising from any higher development quantum in the longer term, mainly after 2035, can be appropriately met on a sustainable basis.

The MaP Plan sets out a summary plan of transport schemes at Fig SV3 and a list of these projects. This reflects a quite widely varying level of definition and commitment to each. Since

the adoption of the existing Local Plans, the change of council administration has also had a significant influence on the programme of schemes. So has the impact of construction cost inflation since 2022 in particular, that made previous projects wholly unaffordable.

Long-awaited interventions in the Rowstock area, at Marcham and at Frilford have been abandoned in the form previously anticipated. Each is now the subject of a re-start, from first principles. We welcome the renewed objective of securing improved bus journey time and reliability. This is essential if ambitious wider LTCP5 objectives regarding re-moding of car-borne journeys are to be realised.

We must stress that at no point over the last 12 years have we been involved in any discussions regarding the previous scheme/s, the bus priority elements of which were never published and seemed extremely vague.

Fig SV3 shows all safeguarded schemes proposed in the submitted JLP. The diagram makes no distinction between schemes progressing covered above and a longer list of other potential interventions. The divergence and lack of clarity as to what infrastructure the County Council is in fact sponsoring going forward, and between planning and transport policy, was something we highlighted in our duly-made representation to the JLP.

Concepts are presented that look likely to be highly material to addressing chronic problems that directly and seriously undermine the safety and efficient operation of the local highways network. Delay and unreliability affect bus services greatly more seriously than any other category of road user. These include:

- South Abingdon Movement Corridor
- A4130 Safety Improvements (Wallingford Road realignment)
- Wantage Western Movement Corridor (Western Link Road)

These are would all be strongly supported by OBC.

Objectives and Action

Objective SV1 Enhance public realm in settlement centres

Where bus services are concerned this is especially important in the largest settlements, the towns of Didcot and Wantage. These are significant venues for bus trips, as well as performing an interchange function. Achieving an appropriate balance between a wide range of design objectives in these kinds of location is something that we recognise is inherently challenging. It is essential that the needs of bus users, and efficient bus operations, are not unduly compromised.

We **support** the objective.

We have already offered substantial design input to the Didcot Central Corridors, scheme, and the initial concepts for Wantage Market Place. We applaud the judicious and collaborative approach taken by officers thus far with the Wantage Market Place scheme.

In villages and local centres, the Objective ought to secure more attractive bus stop/stand facilities as far as possible. We urge the Council to note that bus stops at these locations are likely to be timing points where buses might need to wait time on occasion. This being the case, off-carriageway stands are often important to prevent stationary buses blocking traffic flow. It should not be assumed that lay-bys and pull-ins can or should be removed, without potentially material difficulties arising for the safe passage of traffic, including cycles.

Objective SV2

We have no specific comment to make on the Objective.

Objective SV3 Deliver a comprehensive, comfortable, direct, safe, coherent and inclusive walking, wheeling and cycling network

This objective simply repeats higher level LTCP5 policy. As such, it really does little to advance or clarify actions, save to point to the development of LCWIPs within the MaP Plan area, something already stated in LTCP5 and thus a higher level commitment.

Most bus journeys involve a walk at both the start and end of the trip. A significant and rising number can involve cycling, especially in the context of Science Vale. We **support** the objective, alongside other Objectives to improve bus stop infrastructure and local inter-modality.

Objective SV4 Ensure developments deliver comprehensive on-site and off-site walking wheeling and cycling provision.

Again, we **strongly support** this Objective.

Direct safe and legible active travel to bus stops, which are typically off-site, is essential. More broadly, this objective is necessary to support a greatly higher level of active travel uptake for short trips, damping demand for car use and mitigating what would otherwise be likely to aggravate congestion on key parts of the highway network used by buses.

The Objective essentially re-states LTCP5 Policy.

Objective SV5 Waterways and Greenways

We have no specific comments to make on this objective.

Objective SV6 Reduce walking, wheeling and cycling barriers caused by physical severance

We **strongly support** this Objective.

We note in particular:

6.1 Explore the reallocation of highway space at the Culham and Clifton Hampden River crossings to improve provision for walking, wheeling, cycling and public transport, subject to provision of the Didcot to Culham River Crossing.

This crossing is one of the four elements of the HIF1 Package, on which work is shortly to begin. The degree to which the Objective is achievable is something that will need very careful consideration. Overall highway widths are very limited, and effectively promoting walking and cycling is likely to leave insufficient space for bus operations. We are committed to exploring this potential thoroughly with the Council. Of the two, the Culham Crossing is the more likely to be that where bus operations ought to be a higher priority.

We note and **support** the Objectives to secure improved active travel connectivity across the A34 in 6.4-6.6 inclusive. The Milton Heights active travel bridge is a scheme currently protected in planning policy. It is of particular relevance to the substantial expanded neighbourhood west of the A34 that is not directly served by bus. Direct connectivity to Milton Gate bus stops, and

even higher levels of bus frequency and connectivity at Milton Park, will be secured by this project. We suggest that this project should include a scheme to significantly improve the bus stops at Milton Heights, from the current rather sub-optimal offering to a full "transport hub" standard, making the potential for interchange more explicit. Further land is already under promotion at Milton Heights.

Objective SV7 Introduce Shared micro-mobility schemes, subject to central government legislation

Oxford Bus Group is far from convinced that trials in the UK and more broadly demonstrate that powered micro-vehicle hire is broadly relevant, cost-effective and safe sufficient to warrant widespread roll-out. The commercial model is apparently challenged outside dense urban environments with a large number of tourists.

Many jurisdictions are now removing these schemes as the public benefits are quite unclear, while the disamenity issues are much more broadly evident. These public hire schemes also effectively provide "cover" for widespread illegal use of such vehicles, that are privately owned, on the public highway. The hazardous and irresponsible use of these vehicles, especially e-scooters, presents particular real and perceived threats to pedestrians, including bus passengers in particular.

Thus, this Objective undermines the achievement of national and higher-level local transport policy, which seeks to prioritise walking above all modes.

We **do not support** this objective.

Objective SV8 Develop a network of cycle parking, hubs and hangars.

We **support** this objective.

This Objective should align and seek to support enhanced first and last-mile interchange with bus services at local mobility hubs.

The Objective might seek to introduce specific language referring to provision of substantial cycling facilities at key nodes on the bus network.

Objective SV9 Create a network of mobility hubs

This objective re-states LTCP5 policy.

We **strongly support** this Objective.

The language is phrased largely in terms of two existing and one future rail stations. However the achievement of this goal is much more likely to involve key nodes n bus corridors, and this is not made clear, though we note and welcome reference to the A4074 corridor, which we have long asserted is well suited to this kind of strategy. One of two pilot such hubs is planned at Benson Marina on the A4074.

However, other key nodes that would support inter-modality exist. We have long stressed the necessity of a mobility hub at Station Road Grove, where all bus routes converge north of Grove and Wantage, and which could also be delivered in advance of a new station, with some grounds to believe that it could protect for its delivery. Other key nodes are identifiable at Great Western Park neighbourhood centre, and Wantage Market Place.

We are keen to see the development of a specification for a local mobility hub, that can be rolled out at lower costs and risk, and at higher speed, across a wider range of sites – such as Milton Heights (noted above).

Objective SV10 Enhance bus services.

10.1 Work with partners to provide faster bus services, with consideration given to increasing frequencies (including "turn up and go" services) and express, or limited stop services and the optimisation of existing services.

We have been ourselves focused on just these objectives consistently for the period since we have been operating in the MaP Plan area, and particularly since our acquisition of Thames Travel in 2011..

The essence of achieving a step change in bus speeds and ultimately, in frequency and patronage, will certainly involve ensuring buses are prioritised over general traffic across Science Vale and beyond.

Both ourselves and Stagecoach, the principal other operator, have long highlighted the areas of the most serious congestion on the network. Major committed capital schemes including the HIF1 Didcot Package and Steventon lights, can be expected to make a substantial improvement to overall network conditions in many places. However, within the Plan area and outside it, serious chronic congestion remains, with no clarity on how it will be addressed. This includes Frilford and Rowstock within the plan area. Key Science Vale bus routes are especially seriously affected by the situation within Abingdon, notably but far from restricted to Marcham Road/Ock Street; on the A34 between Abingdon and Kennington; on the A4074 at Golden Balls/Nuneham Courtenay, and by increasing congestion around Besselsleigh on the A420.

The objective of making buses consistently faster and more reliable along entire corridors would of itself serve to release current operating resource to increase frequency.

We would also stress there is an inherent tension between fast and direct bus services, and running routes for extensive distances through new residential areas where bus speeds are intended by design to never exceed about 18 mph. An especially good example is the Grove Northern Link Road. We have long emphasised that major development spine roads should be expected, generally speaking, to have a 30mph limit for this reason. As it is these streets generally now incorporate extensive off-carriageway cycling tracks.

There is also further tension between these objectives and the county's "vision zero" policy which has seen large sections of 20mph speed limits introduced to bus routes across the county over recent years. Service 33 is a prime example of a service which is restricted to 20mph over the vast majority of its operating route, and this has resulted in several iterations of timetable padding in recent years, which have served to significantly reduce the relevance of the connection opportunities that the route is able to provide, within these constraints.

A very significant proportion of the network between towns runs direct and with few if any stops. This is not just limited to the express service running along the A34, such as ST1, X32 and X34. It is thus quite unclear what is meant or anticipated by the Plan in this regard.

We have been consistently signalling to Council Officers, and through the JLP 2041, the need for targeted bus priority measures that are necessary to achieve this Objective on major Science Vale bus services. These involve interventions as follows:

- A4074 between Dorchester and Nuneham Courtnay, including early low-risk delivery of bus priority approaching Berinsfield Roundabout in advance of more substantial work. (X40 River Rapids)
- A bus mode filter at Bagley Wood between Lodge Hill and Kennington, creating a traffic-free route parallel to the A34 in both directions seamlessly feeding into future bus priority at Kennington Interchange (X1, X2, X15, X32, ST1)
- A mode filter at the bottom of Cumnor Hill (among other routes Stagecoach S9 Wantage-Grove-Oxford).

Urgent action to assess the scope to greatly reduce traffic on Marcham Road/Ock Street in Abingdon is also required.

10.2 Work with partners to provide new bus services in Science Vale including to places outside Science Vale, to locations that are currently underserved and to new developments.

Obviously, **we would strongly support in principle** the objective to improve bus service connectivity.

The network outside Science Vale is already comprehensive, especially towards Oxford. As we mention elsewhere, one of the biggest strategic gaps remains a regular direct Didcot-Eastern Arc service via Culham and the A4074. This cannot be delivered until HIF1 if implemented.

Elsewhere, the network runs directly to a wide range of points beyond Science Vale, most notably to Newbury. This service has only been established since summer 2024. How far extension of the Wantage to Faringdon service to Swindon could be justified (as it would overlie an existing much stronger inter-urban service) is quite hard to envisage, as there is no clarity that a substantial suppressed demand exists.

These kinds of longer-distance links involve high operating costs and are exceptionally high risk to establish, with the likelihood that a long development period would need to be financed. By definition, investment of revenue support is much more likely to achieve much greater impact over a shorter period, reinforcing the existing core network, than substantial extensification across what are sparsely populated areas outside the MaP Plan area.

Substantial broadly-agreed strategies exist to reinforce the network to serve those strategic allocations that have yet to come forward. Culham New Settlement (SOLP 2035 allocation STRAT 9) is that which stands out, for which no planning application is yet submitted on the residential area west of the railway. This lies on what is anticipated to be a substantially reinforced route broadly following the 45 existing service between Didcot and the Oxford Eastern Arc.

Within VoWHDC, the principal allocation within the MaP area yet to come forward is 800 dwellings West of Valley Park (New Farm). This likely to be served, ultimately, by provision related to Valley Park, and through new stops to be provided on the A4130 as part of the HIF1 scheme.

With regard to underserved locations/corridors, the text makes no attempt to specify where these localities might be. However, the Abingdon-Sutton Courtenay-Didcot service currently runs every hour, as does the direct Wantage-Harwell-Didcot X35, having previously operated every 30 minutes. Restoring the X1 Wantage-Grove-Abingdon service to every 30 minutes might also be a good aspiration in due course. In addition, enhancing service 44 between Abingdon, Wootton, Cumnor and Oxford from its current every 60 minutes frequency to every 30 minutes, and eventually every 15 minutes (supported by the proposed development at Dalton Barracks) must also be a key objective.

10.3 Work with bus operators to ensure improved reliability, attractiveness and resilience of services.

Naturally we **strongly support** this objective. It is of foundational importance to achieving the kinds of uplift in public transport use necessary to support the achievement of wider LTCP5 goas to reduce single-occupancy car trips by half by 2040.

We point back to our comments above under Objective 10.1. Early action to deliver significant strategic bus priority measures need to feature strongly in early capital investment programmes, including the outcomes of the Rowstock and Frilford studies references within the draft Plan.

10.4 Work with bus operators to improve the service level in the early morning, and late evenings to support employment and the nighttime economy.

We **welcome** the recognition of the importance of bus services outside core weekday daytime hours, that has typically been those to which services have been restricted. However, since 2020, very substantial extension of service operating hours has been undertaken first of core routes, and increasing extending over a larger proportion of the network.

10.5 Work with operators to provide long-distance coach services connecting to Science Vale.

This objective seems very hard to square with much more ambitious and specific measures in the plan and wider policy regarding the railway. Didcot already offers a larger number of trains per day than Oxford, and a very large number of direct train services extending to all points of the compass. Should aspirations to extend East-West Rail services to Didcot be realised, then this will be even more true. It is very hard indeed to see what connectivity gaps coach services could be expected to fill, and the text makes no attempt to suggest where these might be either.

Science Vale lies considerably to the north of the M4 corridor which acts as a principal express coach route. The A34 is much less strong in facilitating coach connectivity – not helped by its exceptionally poor resilience. We therefore cannot currently support this objective, without carrying out further work with the county to identify specific proposals in this area.

Objective SV11 Enhance Bus Infrastructure

11.1 Work with partners to develop a strategy for the redesign of Didcot Parkway Bus Interchange and Didcot Town Centre, including reviewing routing through the town centre.

Existing growth commitments set out in Local Plans will require further bus service connectivity and frequency enhancements that will place additional operational demands on Didcot Station Interchange, that are not possible to be accommodated in its current configuration.

Other committed highways schemes and interventions associated with HIF1 and Didcot Northern Perimeter Road Stage 3 can be expected to offer substantial scope to reduce through traffic in the town centre along Broadway, and past the Station. We are separately well advanced in efforts to establish high quality staff welfare and supervisory facilities at Broadway in the town centre.

We **welcome and strongly** support this objective.

Some substantial works are likely to be needed particularly on the south side of Station Road/Hitchcock Way, and at or near Broadway, to accommodate a larger number of higher quality bus tops and stands.

11.2 Identify opportunities for the improvement of bus infrastructure (e.g. waiting facilities, location for new bus stops, Real Time Information, application of AI, raised kerbs, lighting, shelters, CCTV, onward travel maps).

This theme is covered in the Oxfordshire Statutory Enhanced Partnership's Enhancing Bus Reliability and Infrastructure Working Group. It is a core matter for the Enhanced Partnership.

Naturally then we **strongly support** the achievement of this Objective.

Significant gaps remain in the provision of bus stops to serve large-scale new development that is build complete, or approaching it. Abingdon Road, Didcot, and Station Road Grove stand out in this regard. It is important that efforts are taken to ensure the timely delivery of bus stops once agreed, to ensure we make the greatest use of s106 funds that are being used to support bus service development.

We have long advocated that bus stop locations are fixed at Outline permission, and that as far as possible, developers self-deliver bus stops on site and adjacent, under s38 and s278 of the Highways Act 1980 respectively.

We note and especially welcome the intent to ensure that bus stops are safe for all users. This includes lighting and passive and active surveillance.

11.3 Work with partners to develop a strategy for consistent bus branding and route identification across Science Vale.

We cover this earlier in in our response.

A number of statements are made in the document on pp 14-15, regarding the need for a single brand. We are unclear what empirical evidence exists for the assertions made. Swindon does not have a single unified brand, as the MaP Plan text states; indeed it never has. It should be recognised that nearly all buses operating on routes in the Science Vale operate beyond it. A local unified brand covering just Science Vale is demonstrably impractical.

We are willing to discuss bus branding outside the City of Oxford through the Enhanced Partnership, to the extent that it can be demonstrably shown to secure positive outcomes for the travelling public and patronage growth.

11.4 Identify opportunities for bus priority and improvement measures including bus lanes, removal of parking and traffic signal priority within Science Vale.

This theme is covered in the Oxfordshire Statutory Enhanced Partnership's Enhancing Bus Reliability and Infrastructure Working Group. As our wider response makes plain, we support the principle of this Objective in the strongest possible terms.

As framed and with a view to the wider content of the MaP Plan, it is regrettable and disappointing that the Objective does not clearly define or drive action.

A clear focus on where in the Plan area such measures are required, and some level of prioritisation, is begged.

11.5 Work with partners to introduce bus priority and improvement measures.

This Objective appears to duplicate 11.4, and should be merged with it.

11.6 Work alongside partners to deliver a zero-emission bus network across Science Vale.

Within Go-Ahead Group, Oxford Bus Group shares a clear objective to decarbonise the fleet across the business as fast as possible, this includes Science Vale. We **support** the objective.

The nature of the bus operation across the wider Science Vale and beyond it is such that battery electric technology may not be the most appropriate or feasible approach. Notwithstanding substantial improvements in BEV range, operating penalties remain, especially where sustained high operating speeds, gradients and long operating hours are involved. We are therefore in the process of developing a business case for a major hydrogen bus project at our Didcot facility – this will require public funding to deliver and it is therefore key for the county to consider where this funding can be sourced from, and how an asset such as a hydrogen fuelling station may be able to support other transport sectors in the area with their decarbonisation aims.

Objective SV12 Support improvements to the rail network in the short term.

The future investment pipeline in the railway network, nationally and more locally, will sit entirely with the Secretary of State for Transport. The 2025 White Paper on Local Government Reform also sets a clear expectation that the new Combined Authority Tier, that would sit above Oxfordshire, will be the body which is expected to have the responsibility for shaping rail services and investment strategy at a sub-national level.

This objective covers a substantial number of elements, many of which are unfunded at this writing, and several of which given their scale and nature cannot be realistically delivered for a

considerable period. The lack of track capacity between Oxford and Didcot is a long-known bottleneck that would require a large-scale scheme and Transport and Works Act powers.

Clearer cross-reference to the Oxfordshire Rail Strategy 2050 would be appropriate. Many initiatives essentially are dependent on larger-scale schemes that extend outwith the MaP area.

Likewise, the alignment of initiatives with committed strategic development sites, such as at Culham, is not mentioned. Much depends on how development proposals on allocation STRAT 9 comes forward.

12.1 Work with Network Rail to ensure the electrification of the rail line between Didcot Parkway and Oxford.

12.2 Work with Network Rail and East West Rail to achieve the extension of East West Rail services to Didcot Parkway and in the future Wantage and Grove, to provide services between Science Vale and Milton Keynes and onwards towards Cambridge.

12.3 Collaborate with partners to improve the accessibility and infrastructure at Culham Rail Station.

12.4 Work with partners to lobby for additional services and capacity improvements at Didcot Parkway.

12.5 Collaborate with partners to deliver the Strategic Outline Business Case for Wantage and Grove Station.

Objective SV13 Support improvements to the rail network in the medium to long term.

This principally seems to involve the delivery of a Grove Rail Station, as well as undefined further rail service enhancements at Didcot.

There is little further content.

It is evident that without much more clarity about the Secretary of State's aspirations for the national rail network, its governance structure and processes, including the actual level of influence and participation of local authority bodies in shaping rail investment decision making, and its investment budget and prioritisation in the longer term, little more can be said. This area is intended to be the prerogative of a future Combined Authority Mayor, rather than any more local body.

The rail assets in Science Vale are key elements in delivering existing and future national rail connectivity and outputs. As such, any future decisions will remain highly circumscribed by strategic fit with national rail planning objectives and priorities. The Plan should be clear and explicit about this.

Objective SV14 Support the development of a car club network and car share schemes.

Oxford Bus Group is well aware of the evidence that car clubs reduce the pressure on households to commit to the high fixed costs of personal car ownership, which then incentivises car use for most journeys. The avoidance of second car ownership releases

individuals to take advantage of a wider range of choices depending on journey purpose. This includes active travel or public transport use.

The wide roll-out of car clubs also serves to reduce the density of car ownership and thus, on-street parking in residential areas. This is one of the biggest hindrances to efficient bus operation in residential areas, especially newer ones, as is discussed at length in the joint Go-Ahead-Stagecoach guidance on urban and street design for new residential development.

Car share is an even more powerful tool to reduce car mileage, and both congestion and parking pressure, and has relevance to a very wide range of trips for which public transport use is unlikely to ever provide a realistic choice by virtue of origin-destination and distance.

The available platforms are now multi-modal travel planning tools, most notably the transition of the Liftshare.com offer to a multi-modal "Mobilityways" product. This provides a direct means of accessing the full range of choices for any potential journey, regular or occasional. It is a particularly powerful behavioural change tool, when used by major employers or destinations such as hospitals or sporting venues. We have long recognised this potential and urged the Council to seek to support its broad roll-out, not least within the City of Oxford. Key destinations such as MEPC Milton Park are already well established with such tools.

We thus strongly and unequivocally support the Objective.

We urge the County to go further, and faster, to support the uptake of tools including the Mobilityways platform, including in residential as well as employment travel plan strategies. Prioritising multi-modal personal travel planning, and requiring dedicated car-sharing parking as part of County Transport Development Management requirements where major trip-generating uses are proposed, should take place, to drive action. 14.3 needs to be modified to this end.

Objective SV15 Demand Management

15.1 Identify locations for potential demand management measures in suitable locations including restricting car parking availability.

National evidence is plentiful that restricting parking at residential origin has no impact on reducing car ownership or use. It merely increases parking pressure on the highway, including footways. This blocks footways, cycle provision – including flagrant abuse of segregated tracks – and hinders efficient bus movement. Demand management at major destinations such as Milton Park, to which high quality alternatives exist, may be possible. However, this is already being driven hard and fast by the park owner. There is no District General Hospital in the MaP Plan area to which such measures credibly might also be applied.

The proposal is entirely inspecific beyond this.

15.2 Work with partners to develop a strategy for the implementation of demand management measures.

Without any clarity or specificity, this measure seems to be a generic placeholder for an exceptionally broad aspiration.

15.3 Support the removal of on-street parking along identified routes and high footfall areas, the LCWIPs, DCC, SATN and priority bus routes and to support the delivery of cycleways, where appropriate.

Naturally **we support this strongly**. This will be especially appropriate in Didcot and Wantage Town Centres. Care will need to be taken to retain appropriate levels of access for deliveries and servicing.

15.4 Consideration for the provision of new or extended Controlled Parking Zones.

The principle is **supported.** How far it is justifiable or necessary in the MaP Plan area is likely to be quite limited. Most of the built environment has been purpose designed to accommodate on-curtilage parking as it has been developed since 1960.

15.5 Continue to work with our partners to reduce the number of existing parking spaces at existing employment locations, including but not limited to Milton Park, Harwell Campus, Culham Campus and Williams F1.
The principle is strongly supported but needs to be implemented only when there is confidence that sufficiently attractive portfolios of sustainable choices exist and can be effectively presented as such to the target audience. Here, the use of tools such as the Mobilityways platform will be of the essence. The role of lift-sharing should not be underestimated.

Several major employment venues lie a very considerable distance from any existing bus service and there is not realistic prospect of this changing. This includes Grove Business Park, Williams F1 and large sections of the future Culham No. 1 strategic employment site – which is within a secure perimeter, precluding public buses from entering. This being the case, a robust and properly evidenced view needs to be taken as to how demand for parking and single-occupancy car journeys is best managed.

Objective SV16 Deliver movement infrastructure schemes.

Committed Schemes

a. *HIF1 (Widening of the A4130, Didcot Science Bridge, Didcot to Culham River Crossing and Clifton Hampden Bypass).*

Oxford Bus Group publicly and unequivocally supported this scheme at the recent conjoined Public Inquiries. Our strongest possible support is a matter of public record. The multiple compelling reasons for this position were stated in detail at that time, and we consider need no detailed repetition.

The need for the schemes was tested in depth at previous Local Plan Examinations in Public, as well as at the PI. They are necessary to deliver the existing growth commitments without leading to unacceptable safety and operational impacts on the highways network. The HIF1 scheme package is crucial to address not just network capacity but key vehicular connectivity deficits especially over the Thames, without which any credible strategy to develop the public transport offer north of Dicot, including to current Local Plan strategic allocations, is completely impossible to deliver. The scope to effectively maintain existing service levels, much less advance any credible public transport improvement strategy in support of both current trip

demands and future growth would, in the absence of HIF 1, be entirely removed with no evidence available at to what practical alternative could be put in place.

We maintain our strongest possible support and look forward to a practical mobilisation of works in early 2026, with a view to completion of all elements in 2028.

b. Steventon Lights Integrated Transport Scheme.

This scheme sits at a key point on the bus network as it approaches the A34 SRN junction, and delivers significant and necessary bus priority alongside freer-flowing operation of the network for all users, also benefiting buses more broadly.

Its early delivery is **strongly supported.** We note that construction is commenced on Monday 17th November 2025.

c. Milton Heights walking, wheeling and cycling Bridge.

The consolidation in the VoWH Local Plan 2031 Part 1 of limited pre-existing development at Milton Heights, a location off the bus network and elevated considerably above the wider landscape and the nearest bus stops, was always one we were uncomfortable with.

This bridge does make very material improvement to the relevance and attractiveness of active travel and wheeling for local journeys, both to facilities and employment at Milton Park, damping demand for car use from the area and directly mitigating impacts on the Milton Interchange. It also ought to assist in linking the developments to facilities that will come forward at Valley Park in due course.

The scheme is thus **supported.**

d. Didcot Northern Perimeter Road Phase 3.

This is the final section of a wider project originally planned in the 1980s. It remains entirely justified to address capacity issues, principally by making the entire NPR a much more effective bypass route for longer-distance and HGV movements. Its effectiveness in reducing traffic within the built-up area will be further enhanced with the combined effects of the western-most portions of HIF1.

This can be expected to justify substantial reallocation of highway spec in central Didcot, including Station Road/Hitchcock Way, for improved public transport reliability and productivity, as well as active travel. This will include the need for enlarged bus/rail interchange facilities at Didcot Station Interchange.

The scheme is **strongly supported.**

e. Grove Northern Link Road.

The scheme is partly implemented and forms a continuous central spine road through multiple allocated residential parcels in successive local plans extending in total over 3km. The final sections are now the subject of planning permissions, following resolution of land control issues. We supported the applications strongly. The road is being delivered by each developer though their respective controls. Key links are required to be open to justify 1000 of the 2500-unit consent at Grove Airfield coming forward, as well as the allocation at North West Grove, and at Williams (phase 2) neither of which yet benefits from a planning consent.

The scheme is intended to act as the bus route through these allocations. However, its alignment, design and lack of bus stops make its actual use as such problematic, also being likely to demand the removal of bus services from existing parts of Grove. As such, Oxford Bus

Group is of the view that its use by core inter-urban bus services is inappropriate, a point that has formally been made to the County Council's public transport team.

Notwithstanding this, this non-strategic scheme is clearly critical to effecting appropriate vehicular and active travel access to and through extensive development. It is **supported**.

Objective SV17 Develop future movement infrastructure schemes.

17.1 Consider exploring previously identified potential

It is very far from clear how the list of measures under this objective has been divided into three lists and what the practical or conceptual merit of this is. The lists under 17.1 and 17.3 follow the same title, which seems to be the weakest level of commitment to consider whether or not any more examination of the schemes and areas concerned is something the Council has an appetite for. There seems a quite clear implication that there is a real doubt that any such potential will, in fact be explored. There is particularly great confusion between what is referred to at item 17.1 d) and item 17.3 d).

a. A4074 Corridor Study (including Golden Balls).

Oxford Bus Group has long been very interested in this study. The corridor intersects the far north east of the MaP Plan area at Berinsfield. The A4074 is a major premium inter-urban bus corridor between oxford, Berinsfield, Wallingford and Reading, operated as Thames Travel's River Rapids X40. This was enhanced to operate every 20 minutes in August 2025, alongside introduction of a £3m investment in brand new high specification double deck buses.

The operation of the corridor as a whole is prone to serious congestion and delay, especially north of Shillingford. Existing large-scale planning commitments at Mount Farm and Culham, as well as delivered consents to the south, make these problems certain to markedly deteriorate. The completion of HIF1, including the new Thames Crossing and the Clifton Hampden Bypass, also opens up a much more attractive and efficient route south to/from major development at Didcot Garden Town, feeding directly into the A4074 at Golden Balls.

The lack of any identified mitigation for the major constriction at Golden Balls and Nuneham Courtenay, is an extremely serious and troubling deficiency in the adopted South Oxfordshire Local Plan 2035. The Study addresses this lacuna.

We have made detailed and consistent representations and submission both through the Joint Local Plan 2041 and otherwise directly to the County Council, regarding short, medium and longer-term interventions that would:

- Repurpose what is largely under or unused carriageway to effect bus priority from Dorchester to Nuneham Courtenay
- Create a bus-only section in the longer term, of the narrower stretch adjacent to Berinsfield, diverting the vehicular flow to the west and providing from an outer Mobility Hub/Park and Ride, consolidating a significant number of car journeys south of the constriction.

We therefore **strongly support** the evaluation of measures to effect a major restructuring of the corridor in favour of public transport in particular.

This exercise is even more crucial in the likely event that that JLP 2041 does not proceed, and evidence is needed to support the identification of a substantially greater development quantum in the area in the longer term.

b. Didcot Central Corridor.

We **strongly support** the scheme in principle, as part of a much more fundamental and ambitious agenda to rebalance the current attractiveness of cars for local journeys, towards active travel and public transport. The principle of traffic reduction and removal of on-highway parking, especially on High Street, is strongly supported. Currently, on-street parking prevents two buses from passing at key points.

We have made detailed design responses to past public engagement exercises.

c. Frilford and Marcham Improvements

We note, welcome and **support** the principle of these improvements. Previous preferred options including a Marcham Bypass were abandoned without any replacement strategy yet being put in place.

The A415 between the A34 and A420 (and on to cross the Thames towards West Oxfordshire) is a major local route, not least to support HGV movements and the wider economy. It is largely unimproved and suffers from a major constriction in Marcham village. This prevents buses using a direct route through the village. Plans for a Bypass have existed for at least 50 years.

Equally the A338 represents one of two principal routes linking Wantage and Grove to the wider County including Oxford itself. Absolutely and relatively, this is the largest concentration of committed development in the Vale. Any future scenario, including that which anticipates a halving of current car traffic demand, requires capacity improvements give the scale of growth to which has been committed. Without this the effective operations of multiple key bus services becomes impossible in the medium to longer term.

Bus operators have provided detailed input to the Study over the last 3 years. We note that the Study has yet to present any outputs for consideration. There is no statement made as to when it will conclude within the MaP text. This is a serious concern. It is vital that the County seeks to establish an appropriate way forward as soon as is realistically feasible.

d. Rowstock Area Travel Study.

This item apparently replaces a number of schemes that had been captured under a "Relief to Rowstock" banner in previous strategies, including within the Vale of White Horse Local Plan. This included realignment and widening of Featherbed Lane. Bus priority improvements ("Harwell to Didcot Busway") were also part of these plans, but we have never been appraised of what such measures involved. (see item 17.3 also).

The ongoing redevelopment of Harwell Campus as well as growth at both Didcot and Wantage, with exchange of population between them, continues to place ever greater burden on the junction at peak times. The junction is used by multiple Thames Travel bus services. These services are likely to see further reinforcement in the medium to longer term, not least to meet the needs of Harwell and to help mitigate wider demands including at the Chilton Interchange. Longer term, substantial and is now under active promotion south and east of Harwell Campus to extend the employment and research facilities substantially, as well as deliver residential development.

We **strongly support** efforts to assess appropriate means to appropriately accommodate trip demands with a particular focus on public transport. We urge that this work is undertaken propitiously and with a view to a future local plan strategy that needs to accommodate a higher level of growth than the current draft JLP2041 provides for.

17.2 JLP 2041 Safeguarded active travel schemes

These are all strategic active travel initiatives, and we do not feel the need to comment further.

17.3 "Consider exploring previously identified potential."

If the MaP Plan area population is to more than double from 77,000 to 170,000 by 2050 – and this estimate is based on a maintenance of much lower rates of housing delivery than have recently been planned for and sustained – then even an overall halving of car trip numbers and mileage across the entire population as JLTP5 is seeking, will not permit demand to be remotely capable of being accommodated within existing capacity. This is already substantially exceeded over large parts of the network.

The list presented is not defined and it is very unclear what even the broad scope of these interventions might be. More can be broadly inferred from the map.

Objective SV18 Corridor Movement and Place Strategies

We note and **welcome** this commitment. The effective development of strategy needs to reflect longer distance flows. Here the two identified corridors stand out.

The A4074 corridor is followed by the X40 River Rapids service between Oxford, Berinsfield, Wallingford and Reading. Substantial strategic growth at Culham and at Berinsfield is allocated in the existing Local Plans that impinge directly on this corridor. A large number of consents have also been granted at Wallingford and Benson, and there is active promotional activity on further land here and at Berinsfield, that is likely to result in material additional growth in the foreseeable future.

We note and welcome a current study for the **A4074** between Berinsfield and the Oxford Ring Road. This is close to being completed. It directly impinges on the MaP Plan area at Berinsfield. In line with our own long-standing representations to the County Council, the Study looks at opportunities to consolidate car-borne movement south of the constriction at Nuneham Courtenay, including a mobility hub/park and ride somewhere in the Golden Balls/Berinsfield area. The scope to deliver comprehensive bus priority, in particular northbound, is also being investigated, on the whole corridor from Dorchester approaching Nuneham Courtenay, and at Heyford Hill approaching the Oxford Ring Road. This is a major opportunity to secure LTCP5 objectives while securing sustainable mobility to support committed plan-led growth, as well as likely further development in the longer term in the MaP Plan area.

Further south plans are advanced for mobility hub at Benson; and a bus only junction modification at Benson Lane, Crowmarsh Gifford, to be implemented in the reasonably near term.

The **A34** forms part of the national Strategic Road Network. The County Council is not the Highways Authority for this route. This needs to be acknowledged as the County has no direct jurisdiction for how this route is managed, or the investment programme on it.

Notwithstanding, the corridor is heavily used by bus services within the Vale and between it and Oxford. North of Lodge Hill, outside the MaP area, up to 10 buses per hour use the A34 in each direction. There is a scheme identified in the Vale of White Horse Local Plan 2031 to establish bus lanes between Lodge Hill and Kennington. This proposal, while formally protected, is not

supported by National Highways, and as such is likely to be impossible to deliver. We have urged the Council to install a **mode filter on the old A34 Oxford Road through Bagley Wood** to make this a protected route for buses, whilst also ensuring that this does not become a rat-run following the creation of south facing slips at Lodge Hill, which are now under construction.

We welcome the recognition that other key corridors are likely to exist.

Of these, the **A415 between Berinsfield, Abingdon and Witney via Kingston Bagpuize** stands out. This is on the edge of the MaP Plan area. The elevation of this to a more strategic priority is essential, not least because it is directly used, but also traversed by several key bus services, the relevance and effectiveness of which is severely compromised. Other major bus network aspirations for the MaP area such as between Didcot, Berinsfield and Cowley, and enhancements between Abingdon and North Didcot, depend on serious issues on the corridor being resolved.

The A415 is also one of only two routes available to HGVs between the A4074, A34 and the A40 at Witney, and the only one of those avoiding the Oxford Ring Road and what can be a quite indirect routing. Between Wolvercote and the County boundary at Lechlade, only two bridges are passable by HGVs, and even these are unsuitable historic structures. Given the level of growth committed to in current Local Plans, and emergent higher levels of growth in West Oxfordshire, notably at Carterton, this strategic problem clearly needs urgent attention.

We would also like to highlight the **A4130** between Henley, Wallingford, Didcot and Harwell. This has a wider strategic significance for east west movement, and population and employment growth in the MaP area can only serve to burden the corridor further. There are few if any suitable alternative parallel routs that do not involve exceptionally long diversions. Virtually the entire corridor is used by regular bus services – in places, quite intensively. The committed HIF1 and Steventon Lights major schemes will address the busiest parts of the route, and create new opportunities in the inner area of Didcot to re-allocate road space to sustainable modes and improve the public realm. However these, and NPR3, are if anything likely to reinforce the wider strategic significance of the corridor, and exacerbate already-apparent issues at key points.

We are aware that there are strong aspirations to try and reduce the demand for HGV movements through Henley. The road between Wallingford and Didcot is of highly inconsistent quality with safety issues, that are subject to longer term schemes.

Objective SV19: Support the safeguarding of land for movement schemes.

This Objective seems to directly relate to the JLP 2041, which is at independent Examination, but the future of which is not determined, and far from clear. We **strongly support** the principle, irrespective, which will be separately necessary and justified in this or any other future local plan strategy to ensure that suitable mitigations are deliverable and put in place in a timely manner.

19.4 Collaborate with partners to explore and identify locations for depots, bus stops and interchanges to support public transport and walking, wheeling and cycling.

The above specific text is particularly noteworthy, especially with regard to bus depot capacity.

In 2017 Oxford Bus Group acquired the existing substantial bus operating premises at Didcot, and subsequently carried out a full refurbishment and upgrade of the facility. This offered necessary space to grow. However, the depot is now essentially completely full as the result of

the very substantial expansion of bus operations across the Vale and beyond. Further material development of the bus offer is highly likely to require additional depot space, certainly in the medium and longer term. The beneficial effect of initiatives across the network to make buses materially faster and more reliable can be expected to mitigate this to some extent, but not entirely.

We thus **unequivocally welcome** this recognition and the commitment of the County Council to assist as appropriate.

Objective SV21: Develop a Climate Resilience Strategy for Science Vale.

This objective is broadly **supported.**

Objective SV22: Continue to develop Science Vale as a local, regional, national, and global hub for testing new and innovative technologies.

22.1 We will seek to explore the following (but not limited to):

a. Zero-emission self-driving vehicle network (i.e., buses, taxis).

b. Electric charging hubs for e-bikes, buses, commercial vehicles, and cars, etc.

c. 5G/ 6G and further generation networks along key travel corridors, such as the A34, Oxford Canal Line and Great Western mainline.

d. Artificial Intelligence uses.

e. Unmanned Aerial Vehicles (UAVs) deliveries at Harwell Campus, Milton Park, and Culham Campus.

f. SMART infrastructure (combining physical and digital infrastructure).

This Objective reflects long-standing political and policy aspirations. This Objective, is in principle easily laudable. Furthermore, the Science Vale has already been at the forefront on innovative demonstration projects, including the autonomous bus trial undertaken at Milton Park with implementation in 2023-24.

Oxford Bus Group within Go-Ahead UK Bus, has its own ambitious programme to support innovation and roll-out of new technology of all kinds, customer facing, vehicle/drivetrain and in support functions.

We are looking to build on the successful electrification of the whole bus network within the city of Oxford and its environs. We have already extended the scope of electric bus operations beyond the area originally intended, to Thame and Bicester. In the MaP Plan area we are actively progressing due diligence towards decarbonising the operation in Science Vale, which is likely to involve hydrogen rather than battery electric technology. Go-Ahead Group has pioneered this at scale in Crawley.

The Plan does not properly acknowledge that ambitious innovation comes both with costs and high levels of risk. The ability of the County to properly assess financial and technical risks is not demonstrated across all the areas set out in this draft policy. The role of specialist investors and partners is not acknowledged – and this will be crucial to achieve success. There are also significant opportunity costs for the Council in pursuing some of these schemes, drawing

political attention and organisational resource aside, when the benefits and costs are not clear, to the detriment of other important projects and initiatives that may well be more effective and present a much higher risk adjusted rate of return. The policy needs to be ready to acknowledge this as well.

The commitment of the Council to support and facilitate innovation in the round is **welcomed and supported**. We trust that we can rely on this commitment as we progress decarbonisation plans for our Didcot site, and, potentially, beyond.

Concluding Comments

We trust that the foregoing commentary and feedback suitably meets the Councils needs and expectations at this stage.

We trust that the point we made can be given due consideration and weight as the draft plan progresses.

Please do not hesitate to contact the undersigned in the first instance if you wish to discuss this response further.

Yours sincerely

Nick Small

Head of Built Environment and Infrastructure