West Oxfordshire Local Plan 2031 – Submission of The North Witney Action Group

Overview of our submission

The North Witney Action Group (NWAG) submits that the proposed West Oxfordshire Local Plan 2031 is **unsound** and should not be approved in the current draft. We submit that the Draft Local Plan, specifically in its proposals for the Witney Sub-Area at paragraphs 9.2.1 to 9.2.68 fails to meet the NPPF tests, in that:

- It has not been **positively prepared** so as to meet "objectively assessed development and infrastructure requirements", specifically the impact to transport, flood prevention and sewerage from the proposed North Witney development
- It is not **justified** because reasonable alternatives to the proposed North Witney have not been treated proportionately in considering the most appropriate strategy
- It is not **effective** because the proposed North Witney development is not deliverable against the criteria set out in the Plan
- It is not consistent with **national policy** in that the West End Link Road (WEL2) fails both the sequential and exception test

Our submission is tightly focused on the Draft Local Plan's proposals for Witney and, specifically, for a development of 1000 houses in North Witney. It was no surprise to us that this development provoked the most debate when the Draft Local Plan was debated by WODC. We set out below exactly why the Councillors who argued for North Witney's exclusion were right to do so and why this proposal in the Draft Local Plan should not be allowed to go forward for approval. We have worked hard to assist WODC to enable them to prepare a sound plan and we have continued to do so in this submission in which we offer arguments in favour of acceptable and sound alternatives.

About us:

The North Witney Action Group represents more than 1,000 residents in the Post Code areas immediately impacted by the proposal to include North Witney development in the Local Plan.

Since the process of consultation about the Draft Local Plan began, we have collected more than a 1000 signatures from local households. We have been careful to ensure that all the signatories are from local residents within the most affected streets around New Yatt Road, Early Road, Vanner Road and Hailey Parish. As we have gone around collecting signatures, overwhelmingly, as the format of the petition sets out (Appendix A), local residents, despite recognising an urgent need for appropriate new development, do not accept the case for this development and are particularly concerned by the impact on traffic, local infrastructure and the environment.

We made a detailed submission on deliverability and viability was submitted to WODC on Sept 19th 2014 in response to the Draft Local Plan of July 2014. We also met with officers and the Leader of WODC to take them through our evidence.

This current submission builds on this evidence and addresses additional data commissioned by WODC & OCC in their support of this Draft Local Plan.

Our Evidence and Objections:

Our evidence and objections are set out below against the following headings:

1. The case for the WEL2 is **unsound**
2. The WEL fails both the **sequential and exception test**
3. North Witney **fails** WODC's **viability** test
4. **Alternative sites** that should be considered
5. **Building on the flood plain** and contributory water courses
6. WODC has not undertaken adequate **due diligence**
7. **Landscape** Impact

The case for WEL2 is unsound.

The case that WODC's Draft Local Plan puts forward for the WEL2 is unsound and based on inaccurate evidence and biased analysis.

The WYG October 2014 WYG Technical Note (RT-A088094-01), is both flawed in analysis and weak in evidence of its support of the mitigation of WEL2 & the Northern Perimeter Road (NPR). However, key raw data unearthed by NWAG through four Freedom of Information requests (FOI) uncovers significant statistical evidence exposing major flaws in reaching their conclusions. Key findings from the additional information gained show a bias towards WEL2, and omission of key evidence.

Link to WYG October 2014 WYG Technical Note (RT-A088094-01) -

https://www.westoxon.gov.uk/media/1033722/Technical-Note-Witney-Development-and-Infrastructure-Strategic-Modelling-October-2014.pdf

Our Analysis has revealed these fundamental findings:

1. **The modelling scenarios are inappropriate.**

Eight of the 10 scenarios within the WYG Technical Summary Report (2.1 Table 2) are modelled on 1,500, 800 and 200 house developments. None of these scenarios are directly relevant to the Draft Local Plan, which specifically allocates 1,000 houses. Of the two scenarios that do model 1,000 houses in North Witney, one includes SGSR (Shores Green Slip Roads) but excludes WEL2/NPR, and the other excludes both WEL2/NPR and SGSR. It seems perverse that the scenario chosen by WODC for the Local Plan – 1,000 houses with a Northern Perimeter Road plus the added infrastructure of WEL2 (all to be funded by the North Witney development) - is not included in the WYG report.

2. **Double-accounting.**

Modelling results are distorted in Tables 6-13 as the benefits attributable to SGSR have been enshrined within the WEL2/NPR data, and are thus double-accounted in the WEL2 figures. We would contend that this has a direct bearing on the comments made by WYG in their Technical

Report. For clarity, in the NWAG technical response to the WYG report (appendix B), SGSR figures have been separated from the WEL2/NPR figures.

3. **Dependency on High Capacity Junctions.**

The "*assumed*" High Capacity Junctions (WYG 3.15) & (FOI 7980 EIR) are only at this stage a computer model, as an on-site assessment has yet to be carried out. These HCJ's may not be physically deliverable. It is our submission that at the relevant junctions indicated space is constrained, and this would be particularly significant at the four-way WEL2/West End/Crawley Road/Hailey Rd junction. *This junction is also prone to regular and extensive flooding.*

OCC FOI reply – 7980 EIR dated 28/03/15.

4. **Disregard for the impact on local roads.**

No reference is made as to the effect on the B4022 Hailey Road, the link between the proposed NPR and WEL2. (OCC's AADT chart gives the 2011 daily flow rate for this road as 4,400 movements). Under scenario 5a, morning peak flow will rise by 195% over base figure, and evening peak flow will rise by 207%. Hailey Road's peak traffic volumes will therefore triple. FOI 8085. This will impact on the local narrow residential roads, particularly Farmers Close which is also predicted to see a traffic increase of 100%. Already a rat-run, it leads to and from New Yatt Rd, Wood Green and both Narrow & Broad Hill.

OCC -AADT chart

https://www.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/roadsandtransport/traffic/tablea.pdf

OCC FOI reply – 8085 EIR Witney Technical Notes Appendices 101014, dated 17/04/15.

5. **The effect of WEL2 on traffic in the Witney Conservation Area.**

Significantly, SGSR will remove a substantial volume of traffic from central Witney, whilst WEL2 is shown to attract traffic back into the town's Conservation Area. For example, SGSR alone removes 2455 trips from the town centre (WYG Table 9), whereas adding WEL2 brings 16.8% (382 trips) back into the High Street. (WYG Table 11)

6. **The Significance of the Shores Green Slip Roads (SGSR).**

Oxfordshire County Council (OCC) has acknowledged the significant benefits of SGSR as a stand-alone scheme, both in and around Witney, and in the wider District network. In 2011, following the Cogges Link Road Public Inquiry (CLR), the County Council committed to building SGSR.

- CLR Public Inquiry Sept/Oct 2011.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69829/20120614-ha-inspectors-report.pdf Ref 7.51

This four-way junction utilises the benefits of the underused A40 dual-carriageway, and as a stand-alone scheme is the most practical deliverer of Witney's second river crossing.

- OCC/WYG Technical Note 1 Report No. RT-077454-01. Oct **2012**
https://www.westoxon.gov.uk/media/300353/Oxfordshire-County-Council-technical-note-1-Summary-of-development-and-infrastructure-modelling.pdf Ref 5.56

-OCC/ WYG Technical Note Report No. RT-A088094-01. Oct **2014**
https://www.westoxon.gov.uk/media/1033722/Technical-Note-Witney-Development-and-Infrastructure-Strategic-Modelling-October-2014.pdf Ref 4.38, 4.39, 4.40, 4.41

7. Supporting Trends

The evidence produced from the analysis of the WYG report continues the trends from the findings of the OCC 2011 report prepared for the Cogges Link Road Inquiry, and on which we based our submission to WODC in October 2014.

8. Conclusions of our analysis of the traffic data:

SGSR, as a stand-alone scheme, makes a major impact in reducing delay and travel times across the network, increases average speed by taking through-traffic out of Witney, and reduces local village traffic and rat-running. It creates Witney's second river crossing, making good use of available infrastructure, and complements other schemes such as the A40/Downs Road junction, and the Ducklington roundabout upgrade.

North Witney, as a housing development, is shown to have a negative effect over the whole traffic network, and even with the two major road schemes of WEL2 and NPR is proven to be unworkable. It is clearly in the wrong location.

WEL2/NPR re-routes congestion around the town creating new areas of delay, attracting through-traffic as well as drawing traffic into the town-centre. It does not improve the network, and is not shown to be of benefit to other areas of the town. Not even mentioned in the WYG report is the tripling of traffic in Hailey Road and, worryingly, parts of the scheme are not yet confirmed as deliverable in engineering terms. As infrastructure it has not been proven to benefit the wider community of Witney.

WEL2 fails both the Sequential Test, and the Exception Test.

1. The Sequential Test

WEL2 is on a Zone 3B flood plain, and must pass either a Sequential Test, or an Exception Test. The success of this test on WEL2 is called into doubt by OCC in WODC's Draft Local Plan "Assessment of Strategic Site Options 2012", page 79, which states –

"With recent traffic modelling suggesting that the proposed improvements to the A40/DownsRd junction and/or Shores Green west facing slip would deliver greater benefits for the wider network. They (OCC) also expressed concerns that the proposed West End Link is unlikely to pass the sequential test that applies to the development in the floodplain."

WODC in their submitted Local Plan, page 104, ref 8.51, acknowledge this test should steer new development to areas of lowest probability of flooding. This continues "*development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding."*

We submit that not only are North Witney and WEL2 prone to regular flooding, but alternative available sites are not.

2. The Exception Test

In order to stand any chance of passing the Exception Test, the developer must prove that WEL2 is essential infrastructure within the definition of the technical guidance to the NPPF. This is highly unlikely as NWAG has demonstrated that WEL2 causes increased congestion within Witney centre, creates increased rat-running on Farmers Close, and triples traffic levels in Hailey Road.

WODC in their Local Plan submission, page 104, 8.52, states that the Exception Test must demonstrate that the development provides wider sustainability benefits to the community that outweigh flood risk, and that the FRA must demonstrate that the development will be safe for its lifetime.

The WYG at paragraphs 6.2. and 6.3 clearly confirm that WEL2 would primarily service local traffic and traffic from the North Witney development. It, therefore, cannot be considered strategic infrastructure for the wider community.

NWAG submits that WEL2 cannot be considered Essential Infrastructure because of its detrimental impact on traffic in Witney, its impact on the floodplain, and that it only serves to facilitate the North Witney site and therefore does not provide wider sustainable benefits to the community.

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North Witney fails WODC's viability test

NWAG has had the benefit of seeing the detailed submission by Hailey Parish Council (HPC) (Appendix D) in which HPC demonstrates that the assumptions about the viability and deliverability of the North Witney development are fundamentally flawed.

The HPC submission shows that:

- North Witney fails WODC's viability test
- The proposal fails to capture additional costs of just under £13 million
- An error in the viability assessment excludes an identified cost of over £6 million

- Estimates of substantial extra costs associated with a flood barrier on the WEL2 river crossing and an upgrade of the main sewer through Witney have not been made and are not included in the appraisal.
- As identified by Oxfordshire County council, if the outline planning application for 200 houses in Phase 1 does not trigger the need for the WEL2 river crossing then the remaining 800 houses will have to bear the cost.

We strongly endorse HPC's submission. As they do, we believe that "the North Witney proposal is not sound". As presented in the Local Plan, it is already non-viable and the additional costs and issues identified above remove any doubt.

Additionally HPC found that that WODC had not followed due process. They have contended that as the various negative elements arose WODC should have urgently investigated alternative proposals that did not bear all of the burdens associated with North Witney development. In addition to this, NWAG found that the Draft Local Plan which went to full Council in February 2015 contained supportive references to North Witney from the 2004/5 Inspector's comments. These have been removed in the post-vote final draft, having been challenged in debate by two members of the cabinet, after they pointed out that the current criteria on soundness was fundamentally different from 2004. (*Housing Consultation Paper, July 2014. 6.32, 6.33, 6.34.).*

Alternative Sites

There are two alternative sites acknowledged by WODC, where ownership has been clearly established and an appetite for development understood. These two sites can deliver together considerably in excess of the 1,000 houses allocated to North Witney.

1. **Land to the west of Downs Road**

WODC has already approved the construction of 1,000 houses off Downs Road Witney. This site is known as West Witney (North Curbridge) plus 10 hectares of new employment land and is found in WODC Draft Local Plan, page 123, 9.2.29.

There is the opportunity to add an additional 27 acres of land for housing, plus 8 acres for sport and leisure immediately opposite the approved West Witney site therefore benefiting from the additional infrastructure including the creation of the West Witney A40 junction and immediate access by foot or on cycle to the proposed areas for new employment (Policy T1 Page 77 and CO1 and CO11 Page 78)

2. **Land to the South of the A40**

WODC has had before it since October 2014 a comprehensive plan by Abbey Homes to develop land to the south of the town. This is mentioned under 'alternative options' in WODC Local Draft Plan,

page 131, 9.2.50. WODC recognises that the site is close to the town centre and the main employment areas. However, it dismisses the site as an option because of its segregation from the town by the A40. This also runs contrary to Policy T1 points 7.26 7.27 7.28 and Policy T2 on page 85 which commits to working with OCC to securing improvements to the A40 between Eynsham and Oxford.

Policy T2 states, "*contributions will be sought from new development and other potential sources of funding as appropriate".*

NWAG contends that whereas any S106 contributions from the North Witney site would be subsumed into attempting to make this remote site deliverable, (See Hailey Parish Council submission at Appendix D), development of South Witney could contribute to the £30m that OCC has received from government for these A40 improvements.

WODC further states a reason for not taking this forward: *"the scheme would not deliver any strategic highway improvements for Witney".* NWAG contend that delivery of S106 money towards improvements of the A40 would constitute *"strategic highway improvements to Witney",* especially as the A40/Downs Road junction and the SGSR (WODC Local Plan page 132, 9.2.58) improvements allow the A40 around Witney to be part of the strategic answer. The South Witney site is further enhanced by the recognition of the 2014 Ducklington Lane improvements providing upgraded access to both the town centre and the A40 from the site.

WODC also dismisses an option for development to the **north east** of the town. In page 131 9.2.51 they give the reasons that is "*is highly sensitive in terms of landscape impact and importantly, in terms of deliverability,"* NWAG contended in its submission of October 2014 that these comments were no different when applied to North Witney in terms of landscape impact, undermining the new edge of the town, encroaching on to rural setting and employment.

Building on the Flood Plain and Contributory Water Courses

The majority of the proposed 1,000 houses will be built on water courses immediately above the flood plain, land which is the catchment area for the critical **Hailey Road Drain.**

"After the floods of 2007 Hailey Road was identified as a key area at risk. The majority of the main river section of the Hailey Road Drain is culverted and as such it has a limited capacity. The Hailey Road Drain is 4.7km2 and the main river section is relatively short. However, the gradient is steep and much of the immediate area is heavily developed. This means that the time between rain landing in the catchment and finding its way into the watercourse is very short, leading to a high peak flow and rapid response." **EA Witney Flood Report April 2014**

1. **<u>Regular Flooding</u>**

2014 Flooding above the Hailey Road Drain:

There has been wholly undue weight attached to theoretical modelling rather than the hard evidence of recent flooding. No desk top appraisal of an academic 1/100 year scenario can mitigate the actual occurrence of flooding. It is not just exceptional years such as 2007 (https://www.youtube.com/watch?v=Oyf0yHUKtl8&spfreload=10) but now a regular expectation (as above video material from 2014 shows) that there will be significant flooding in Witney affecting particularly the Hailey Road and North Witney area.

The following statement has been written for this submission by the two long term District Councillors for the North Witney Ward on WODC, both of who voted against any development of the site.

"The Hailey Road drain, which is culverted under the carriageway of Hailey Road and Eastfield Road, has regularly flooded during our time as Councillors and indeed, for many years before that.

"The flooding happens, on average, every couple of years and makes the road dangerous and impassable for pedestrians and vehicles. The floodwaters can be up to two and a half feet in places and flows in a very fast and strong current down the length of the road from the junction of Eastfield Road to the River Windrush itself. The source of the water is surface water flooding which originates in the fields above Eastfield Road and completely overwhelms the culvert. This causes the water to flow over ground and bursts the manhole covers to a considerable height.

"In 2007 this flooding caused three homes to have flood waters inundate their properties in Eastfield Road and also in at least five other properties at the junction of Hailey Road and West End.

"A young man died in 2008 when he was drowned in the very high flood waters in the fields above Eastfield Road.

"In our view, this surface water flooding is a regular event and poses a serious threat to life and property.

"The knock on effect of the flooding is to add water to the River Windrush above Bridge Street. In 2007 this caused the flooding of a number of properties in Grangers Place and Millers Mews. This necessitated the families involved having to leave their homes for up to a year whilst the properties were repaired. These houses have not actually flooded since, but have come within a few inches of water ingress on at least two further occasions.

"There has also been substantial and regular flooding of the West End Business Park which has caused very costly damage and significant loss to the local economy. This is caused by the rising water levels in the river, which is exacerbated by the run-off from fields, including those above Eastfield Road.

"A serious consequence of this is that properties in Eastfield Road, Grangers Place, Millers Mews, West End and surrounding areas have all had significant difficulty in obtaining property insurance. Where cover has been obtained it has been extremely costly. We know of at least one case where the history of flooding in Grangers Place has caused the inability of the occupant to sell their house.

"There is no doubt that in our view and with the experience of being the two local councillors, serious and regular flooding, both surface and fluvial, is a significant risk to residents and businesses in north Witney".

Councillor Richard Langridge & Councillor David Snow 29 April 2015

These authenticated observations of on the ground experiences by the two Ward WODC councillors runs contrary to the desk top Key Findings in the WODC Witney Level 2 Strategic Flood Risk Assessment (SFRA) which are either factually wrong and at worst naive, confirmed by the statement in Point 4 *"Our review of available desk top data suggests that there are no other sources of flooding that might significantly affect the development..."*

Given the critical important of the Hailey Road Drain, it is alarming to read that the SFRA has only looked at a desk top model of "*only a small section.... hence a large section of the flood extent throughout the site has not been established through modelling. In order to establish the flood extent and level throughout the proposed site it is recommended that the Hailey Road drain model is extended to cover the proposed site in its entirety."* (SFRA 3.2 Fluvial Flood Risk). NWAG would contend that this report is **unsound** due to it not addressing the core issues.

2. WEL2 Only Adds to the Increase in Flooding

The developer's original submission for WEL2 proposed nine double x 5m triangular piles covering a total of 190m across the floodplain and crossing two arms of the river. At 45m in total width (minimum) these piles must significantly reduce the flow rate and, combined with the substantial

amount of concrete, raise the water level at the already extremely vulnerable Hailey Road/West End junction, the Hailey Road Drain exit and all within 370m of the town centre.

Clearly this piece of engineering is a threat to the town centre and since these drawings came in to the public domain, WODC and the developer have attempted to offer alternatives which simply moves the problem either upstream or offers no cogent strategic integrated answer. Indeed SFRA in their key findings for WEL admits there is no current detailed modelling regarding the impact of design on the flood plain saying "*The modelling should demonstrate that there is no unacceptable increase in flood risk as a result of the bridge construction."* In short the WODC plan has reached this stage without any knowledge that WEL2 is deliverable. Yet again, in our submission, this critical omission renders the WODC Draft Local Plan **unsound**.

3. Prohibited Cost of Managing Foul Water

The remoteness of the north Witney site is illustrated by the fact that the existing sewage treatment works is located 3km away to the south of the town. The SFRA report Point 4.3 says *"Thames Water has expressed concern that the current foul water capacity of the sewerage system is insufficient to support the proposed development."*

WODC (*Witney Gazette April 8 2015)* admitted that there is **no agreed drainage strategy** with Thames Water to deal with sewers backing up. The network of pipes through Witney are all pre-1950 and in February 2015 the High Street's sewers blocked causing seepage and closure of premises. Yet WODC make light of this fundamental infrastructure in Policy WIT2 section K with the passing phrase "*Connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements."*

Furthermore, as the HPC submission points out (Appendix E), the lack of consideration of the costs of the substantial sewerage and waster water infrastructure that are required by the North Witney development adds to the lack of viability of the proposed scheme.

The seriousness of the long-term flood risk to the site, the homes immediately below the 100m contours and the town centre is such that NWAG has commissioned its own report to underline this critical issue. That report concluded that:

"1.20 Oxfordshire District Council have suggested in their Level 1 Strategic Flood Risk Assessment that flood risk in specific areas may have been exacerbated by developments taking place within natural floodplains of watercourses and explained that Witney already contains development located in natural river floodplains, which has evidently resulted in flooding of roads and properties. The Hailey Road site has not been modelled sufficiently enough to identify the outlines of the high risk flood zone however the photographs in Appendix F demonstrate the extent of flooding at the site.

1.21 The Level 2 SFRA identifies a maximum flood depth of up to 1.125m downstream of the site for the 1in100yr event + Climate Change. At this depth for a velocity of 0m/s the hazard classification to people is considered to be danger for most – including the general public. In reality due to the topography it is likely that the flood water is likely to be travelling at a medium velocity which could increase the hazard classification to people to danger for all which includes the emergency services.

1.22 Recent events have shown the local resident's first-hand the damage that flooding can bring.

The local council, local water authority and local residents all recognise that the existing infrastructure (in particular the 750mm culvert) is insufficient, the development would result in increased man-made debris to block the culvert, increased pressure on the existing network and will place more people and property at risk of experiencing flooding."

We conclude that there is a known risk of flooding arising from development (which WODC acknowledge). There is already a serious risk in this part of Witney. The work to assess the risk has been incomplete and it is reasonable to assume that when it is done, the risk will be significantly increased by the development. The Hailey Drain is known to be insufficient now. Developing the site will make this position worse. In short, as currently presented, WODC's assessment of the position is insufficiently sound

WODC has not undertaken adequate Due Diligence

In putting forward North Witney as a deliverable site WODC has failed to examine statements made to them that qualify their own pronouncements. In promoting the site they affirm in Point 9.2.47

"In terms of deliverability, there are no known constraints in terms of land assembly to prevent the site coming forward..."

NWAG has written evidence that this is not the case on a critical piece of land that would be required to complete the NPR between the New Yatt Road and Woodstock Road. This land is owned by the Oxfordshire Community Churches who administrate The Kings School. The trust's company secretary wrote on February 19 2015 and re-confirmed again on April 24 2015

"*I can confirm that we have no approach from either agents, developers or the district council on this matter."*

We therefore have to question what other statements made to WODC have been taken on face value and due diligence not undertaken, especially as we first raised this in our submission to WODC of September 19 2014.

Landscape Impact

NWAG challenges the brief and highly selective statements that WODC has chosen to promote in Points 9.2.44 & 9.2.45 on Page 127 of the local plan in respect of the Kirkham Landscape and Visual Review (KLVR) and these can be more than balanced by the key findings against development.

The whole of the site is within the Wychwood Project area and the parish of Hailey. Any development would erode the sensitive physical separation between Witney and the first Cotswold AONB village, which KLVR defines as the *"important visual gap between Hailey and Witney. Often visually enclosed with long views opening up in all directions from more open viewpoints."* This is reinforced by the comment that any development would be a "*significant encroachment into current visual separation. Although development would be less perceptible from the surrounding road*

network, the visual setting of the farmsteads south of Poffley End would be eroded and views from the footpath network lost." Page 59

The value of the high-grade agricultural land is reflected in the 2014 summer yield from 120 of the 130 acres of 360 tons of corn delivering 464,000 loaves of bread. *Source: FWP Matthews Flour Millers Shipton under Wychwood*

Other Key Findings by KLVR

- *"A major peripheral road would be out of keeping with the local landscape character and would be visually intrusive." Page 63*
- The entire area noted as C3 and earmarked for 800 of the 1,000 houses is described as an *"enclosed small scale wold with farmland and farmsteads carved out of the old Wychwood Forest and is identified by the AHLC as having high landscape sensitivity and high local and district importance." Page 54 : 14.1*
- Recognises that this is one of the few areas within the Witney landscape where contours rise above 100m and then falls in to a central valley and development would divorce the *"distinctive valley feature."* Page 55 14.1.1
- KLVR recognises that development would lead to the loss of that part of the Wychwood Forest project closest to Witney and that a "*string of open spaces does not mitigate against the loss of historic landscape character."* (Page 56)

Conclusions:

The North Witney Action Group (NWAG) submits that the proposed West Oxfordshire Local Plan 2031 is **unsound** and should not be approved in the current draft.

On the evidence of this submission, aligned and supported by the submission from Hailey Parish Council, the inclusion of North Witney in the WODC local plan 2031 is unsound, non-deliverable and as such should be removed from the draft plan and replaced by more relevant and appropriate sites.

Appendix A: The North Witney Action Group Petition

Petition against the WEST END LINK ROAD, and the associated 1,000 house NORTH WITNEY development

We, the undersigned, strongly object to the building of the 1,000 house North Witney development, and the West End Link Road on Witney's floodplain for the following reasons

- Developing North Witney will almost certainly fail to meet a major part of WODC's Kirkham Report recommendations, will cause significant adverse visual impact in the Wychwood Project Area, and create new traffic problems in Witney (WODC/OCC)
- The West End Link Rd will cause irreversible damage to the historic Windrush Valley floodplain, and increase traffic by 69% in the Witney Conservation Area (OCC)
- WEL2 will make Hailey Rd the 3rd busiest road in Witney, increase West End traffic flows to an historic high, and cause rat-running on New Yatt Rd/Farmers Close (OCC)

Name	Address	Post Code		Signature

North Witney Action Group

Appendix B

North Witney Action Group (NWAG)

NWAG Analysis of Tables and comments from 2014 WYG Report (RT-A088094-01)

3. Modelling Results

Table 3. Scenario 1 - Comparison Summary Table.

Following the addition of SGSR (1DS) -

Total Travel Time is reduced by 1.2% AM & 2.5% PM.
Total Distance Travelled is increased by 0.08% overall.
Total Delay is reduced by 4.7% AM and 7.5% PM.
Average Speeds are raised by 0.7 kph & 1.2 kph respectively, 2.4% overall.

This is a comparison across the whole network only.

*

Table 4. Scenario 2 – Comparison Summary Table.

This is similar to Table 3, but with a reduction in West Oxon development from 11,690 houses to 9,447 overall, (incl. 1,500 to 1,000 in North Witney), giving an improvement in travel times, reduced delays and higher average speeds.

Following the addition of SGSR(1DS) & reduced housing numbers, analysis of Table 4 shows -

Total Travel Time is reduced by 1% AM & 2.7% PM.
Total Distance Travelled is increased by 0.15% overall.
Total Delay is reduced by 6% AM, and 8% PM.
Average Speeds are raised by 1kph & 1.2 kph respectively, 2% overall.

This is a comparison across the whole network only.

*

Table 5. Scenario 3 – Comparison of the effect of reducing numbers of houses (1500, 800 & 200) in North Witney across the overall network of the modelled section of West Oxon.

3.12 "As would be expected, the impacts of the North Witney development decrease when considering reduced levels of development, with decreasing total travel time, delay and travel distance and higher speeds."

Clearly the North Witney development has a measurable and detrimental effect on the whole network. Overall delay increases by 5.2% with 1,500 houses over 200 houses.

Table 6. Comparison of the effect on the network with 1,500 houses, with and without WEL2/NPR, across the whole network.

The effect of adding WEL2/NPR -

Total Travel Time in AM reduces by 0.02%, but increases by 1.4% in PM.
Travel distance increases by 0.22% overall.
Total Delay in AM reduces by 1.2%, but increases by 4.6% in PM.
Average Speed in AM rises by 0.1kph, but reduces by 0.6kph in PM.

3.13 *"…addition of WEL2/NPR results in a minor further reduction in travel times and delay….and increases in average speed in AM… However, the levels of overall change to the operation of the Witney network following inclusion of the West End Link appear to be relatively limited."*

The "minor further reduction" in Travel Times in AM is, in fact, just 2 (two) in 8,917 pcu-hrs, and the "increase in average speed" is just 0.1kph, up from 48.5 kph to 48.6 kph.

3.14 **"**…*highway network in Witney is predicted to be worse in the scenario which includes the lower capacity WEL2…due to WEL2 junction delays…and close proximity to the Staple Hall junction."*

*

Table 7. Comparison with/without Higher Capacity Junctions (HCJ) on WEL2 & NPR.

With the HCJ's –

Total Travel Time is reduced by 0.5% AM & 3.90% PM.
Total Distance Travelled is increased by 0.05% overall.
Total Delay is reduced by 2.4% AM and increased by 0.35% PM.
Average Speeds are raised by 0.3kph AM & zero kph PM.

3.15 **(**Scenario 4) *"…which assumes the delivery of…higher capacity junctions…Option is predicted to result in an overall improvement…of the highway network…largest improvement to travel time…However the level of delay on the network is not predicted to reduce significantly in either peak and remains slightly worse in the PM peak following the introduction of the WEL2 scheme."*

*

4 Witney Specific Impacts

4.4 *"A full set of network plans for the Witney area…are appended to this technical note."*

Pages 36 to 41 are blank. Following an OCC FOI request, we received a reply dated 17/04/15 ref 8085 EIR with copies of the network plans. (Appendix C)

These plans enabled us to see the traffic flows on Hailey Road, the road that would connect WEL2 with NPR. See plans 'WitneyLink Base-AM & PM' and 'WitneyLinks S5A-PM &PM'.

Under scenario S5a, morning peak flow will rise by 195% over base figure, and evening peak flow will rise by 207%. Hailey Road's peak traffic volumes will therefore triple. This will impact on the local narrow residential roads, particularly Farmers Close which is also predicted to see a traffic increase of 100%. Already a rat-run, it connects Hailey Road to Vanner Road, New Yatt Rd, Wood Green and both Narrow & Broad Hill.

Much of Section 4 concentrates on the benefits of adding the high-capacity junctions to WEL2, but it has yet to be established whether they can physically be delivered.

The "*assumed*" HCJ's (WYG 3.15) & (OCC FOI 7980 EIR dated 25/03/15. See Appendix C) are only at this stage a computer model, as an on-site assessment has yet to be carried out. These HCJ's may not be physically deliverable as space is constrained. Additionally the Cannon Pool junction at West End/Crawley Rd/ Hailey Rd is prone to regular flooding.

Table 8 Comparison of flows on approach to Staple Hall junction.

4.8 *"The modelling indicates that with the provision of the West End Link 2 and northern perimeter road (in addition to the Shores Green west facing slips) there is a further reduction in flows through the junction, with 521 fewer car trips in the morning peak hour and 558 fewer total trips in the evening peak hour (representing a reduction in total flow of approximately 15%). Scenario 4, which provides the higher capacity West End Link 2 option shows a further decrease in total flows through Staple Hall during the most congested peak period (the PM peak), with a total reduction of 750 vehicle movements predicted."*

All the benefits attributable to the SGSR scheme have been included in the WEL2/HCJ statistics quoted in 4.8. The percentage benefits of a stand-alone SGSR are shown below, followed by those of WEL2 & WEL2+HCJ over and above SGSR.

Adding SGSR 1DS reduces junction traffic in AM by 4.1%, and PM by 8.4% over 1Do Nothing
Adding WEL2 further reduces junction traffic in AM by 11.9%, & PM by 6.7% over SGSR 1DS
Adding WEL2 + HCJ's reduces junction traffic in AM by 11.3%, & PM by 12.1% over SGSR 1DS

*

Table 9 Comparison of flows on A40 (between Shores Green and Ducklington)

S1 SGSR removes a total 2455 trips from Witney, and showing a 35.3% flow increase on this section of the A40.

S4a WEL2+HCJ's reverses 319 (13%) of those trips, putting traffic back into Witney.

*

Table 10 Comparison of flows on A4095.

No comment.

*

Table 11 Comparison of predicted flows on High Street.

4.14 *"Scenario 4, which provides the HCJ's shows an increase in predicted traffic using High Street in both AM and PM peak hours."*

SGSR 1DS reduces AM traffic in High Street by 16 trips (1.4%), and increases PM traffic by 15 trips (1.4%). This is just 1 (one) extra trip overall in 2279 over the Do Nothing scenario 1DN.

WEL2 reduces AM traffic by 87 trips (7.5%) over SGSR 1DS, and increases PM by 201 trips (17.9%). In all 114 extra trips over SGSR 1DS – a combined 5% increase in High Street traffic caused by WEL2.

WEL2+HCJ's increases AM traffic by 31 trips (2.7%) over SGSR 1DS, and increases PM by 351 trips (31.3%). In all 382 extra trips over SGSR 1DS – a combined 16.8% increase in High Street traffic caused by WEL2 with HCJ's

*

Table 12 Comparison of flows on Dry Lane.

SGSR 1DS reduces total trips by 308 (21%) over 1DN.
WEL2 reduces total trips by a further 258 (22%) over SGSR 1DS.
WEL2+HCJ's reduces total trips by a further 341 (29.3%) over SGSR (1DS), and 83 over WEL2.

*

Table 13 Comparison of flows through villages.

Scenario		Hailey	Crawley	New Yatt	South Leigh	Net Totals	
Do Nothing		Not given	-	-	-	-	
1,500 + SGSR	1	+95	-503	-71	+114	-365	
Above + WEL2/NPR	2	+92 / ***-3***	-675 / ***-172***	-100 / ***-29***	+97 / ***-17***	-586 /***-221***	
Above + HCJ's	3	+134 / ***+39***	-685 / ***-182***	-95 / ***-24***	+70 / ***-44***	-576 /***-211***	

Actual village traffic flow numbers have been excluded from Table 13, so gauging the percentage improvement has not been possible.

Table 13 shows that almost two thirds (63%) of the net traffic flow reduction (365 out of 586/576) is attributable to SGSR 1DS. (Line 1)

High-capacity junctions make little difference to the level of WEL2 performance.

*

Table 14 Bridge St trips with origins / destinations via A4095.

No comment.

*

Table 15 West End Link trip origins / destinations within Witney. Scenario 3a

Total trips are 1056, of which 470 are associated with the North Witney development (44%), 306 are 'outside Witney' (29%), and 279 are 'other Witney' (27%).

Table 16 West End Link trip origins / destinations within Witney. Scenario 4a

Trips increase by 29.5% to a total of 1367, of which 682 are associated with the North Witney development (50%), 385 are 'outside Witney' (28%), and 300 are 'other Witney' (22%).

*

Tables 17 & 18 Route Journey Time Comparisons.

Route 1a is shown as using the Northern Perimeter Road (NPR) with a time comparison, yet in Scenario 1DS the NPR is not built.

The West End Link 2 is not used in any scenario.

*

Page 29

SUMMARY IMPACTS OF WEST FACING SLIPS (SGSR)

4.38 "A review of the modelling work associated with the revised levels of development proposed across West Oxfordshire, and within Witney in particular, shows that the A40 Shores Green scheme continues to be expected to provide benefit to the overall operation of the Witney Highway network."

4.39 "In terms of overall network statistics, the provision of the west facing slips results in reduced overall travel times, reduced levels of total delay and increased average speeds."

4.40 "The west facing slips scheme also removes a degree of traffic from the centre of Witney..."

4.41 "The scheme also is modelled to result in significantly increased use of the A40 between the Shores Green and Ducklington junctions…..This increase in use of the local section of the A40 could be expected to correlate to a similar level of reduction in trips on other more local roads within Witney, including reducing traffic within Witney itself and limiting rat-running on some of the surrounding roads (including Dry Lane)."

The comments in 4.39 to 4.41 above, combined with our Table analysis, represent a strong endorsement of the SGSR as a stand-alone scheme with few, if any, drawbacks.

*

IMPACTS OF WEST END LINK 2 AND NORTHERN PERIMETER ROAD

4.42 "The addition of the West End Link 2 and northern perimeter road results in the best overall operation of the highway network in the Witney area, providing the greatest reduction in journey times and predicted delay and a further increase in average speeds."

The evidence in this report does not support this sweeping statement.

4.43 "The scheme removes a proportion of traffic from the Staple Hall Junction, approximately 15% of peak hour movements…"

This claim of a 15% reduction of peak hour traffic actually includes the SGSR contribution of a 6.4% reduction, and is therefore misleading. See 4.8, and our Table 8 analysis.

"…however this reduction is not sufficient to relieve predicted levels of congestion and delay, with both Bridge Street and the Staple Hall junction predicted to continue to be congested in each forecast scenario."

4.44 "The West End Link also results in a greater reduction in rat-running on competing routes, particularly Dry Lane and to a lesser degree through New Yatt."

No mention is made of the effects of WEL2 on Hailey Road and, in particular, Farmers Close.

*

5. Impacts of North Witney

Table 19 Comparison of flows on Staple Hall Junction/s

Without HCJ's -
S3a AM peak shows a 7.4% improvement over just SGSR (without any Nth Witney housing)
S3a PM peak shows a 4% improvement over just SGSR (without any Nth Witney housing)

With HCJ's -
S4a AM peak shows a 6.8% improvement over just SGSR (without any Nth Witney housing)
S4a PM peak shows a 9.6% improvement over just SGSR (without any Nth Witney housing)

The above statistics need to be read in conjunction with the WYG caveat in 5.7 below.

5.7 "*…WEL2 could potentially be expected to mitigate the development traffic impacts of North Witney, specifically at the Staple Hall junction (although this would have to be confirmed as part of a detailed Transport Assessment for the site). This would have to be balanced against the expected new area of potential delay created by the provision of new signal controlled arms on West End and the A4095."*

*

Table 20 Comparison of flows on A40 (between Shores Green and Ducklington) 2

Similar to Table 19, in that it compares having SGSR without any North Witney housing, to WEL2 with 1,500 houses in North Witney.

S3a AM – virtually no change over S1
S3a PM - 2.3% reduction in traffic on A40
S4a AM – virtually no change over S1
S4a PM - 3.7% reduction in traffic on A40

*

Table 21. Comparison of flows on High Street 2.

Similar to Table 20, in that it compares having SGSR without any North Witney housing, to WEL2 with 1,500 houses in North Witney.

S3a AM – 0.28% reduction in High St traffic
S3a PM – 18.4% increase in High St traffic
S4a AM – 11.3% increase in High St traffic
S4a PM – 31.8% increase in High St traffic

North Witney development with WEL2 significantly increases High Street traffic.

5.9 *"…overall traffic levels are predicted to increase, particularly in the evening peak hour, with an increase of 205 trips with the lower capacity option and an increase of 355 with the higher capacity link."*

*

Table 22 Dry Lane 2.

Similar to Table 20, in that it compares having SGSR without any North Witney housing, to WEL2 with 1,500 houses in North Witney.

S3a AM – 11.8% increase in traffic with WEL2&1500NW
S3a PM – 2.0% increase in traffic with WEL2&1500NW
S4a AM – 27.8% increase in traffic with WEL2+HCJ's&1500NW
S4a PM – 17.8% decrease in traffic with WEL2+HCJ's&1500NW

The above statistics need to be read in conjunction with WYG caveat in 5.10.

5.10 *"…rat-running levels on Dry Lane…and South Leigh Road…are both predicted to see increases in traffic levels following the addition of the North Witney development. However the higher capacity WEL2 scheme is predicted to result in a decrease in flows on Dry Lane during the busier PM peak hour."*

NWAG would also add that the HCJ option increases AM traffic in Dry Lane by 27.8%.

*

Table 23 South Leigh Road.

Similar to Table 20, in that it compares having SGSR without any North Witney housing, to WEL2 with 1,500 houses in North Witney.

S3a AM – 7.3% increase in traffic with WEL2&1500NW
S3a PM – 8.7% increase in traffic with WEL2&1500NW
S4a AM – 7.0% increase in traffic with WEL2+HCJ's&1500NW
S4a PM – 5.4% increase in traffic with WEL2+HCJ's&1500NW

*

Conclusion

1. SGSR, as a stand-alone scheme, makes a major impact in reducing delay and travel times across the network, increases average speed by taking through-traffic out of Witney, and reduces local village traffic and rat-running.
   It creates Witney's second river crossing, making good use of available infrastructure, and complements other schemes such as the A40/Downs Road junction, and the Ducklington roundabout upgrade.

2. North Witney, as a housing development, is shown to have a negative effect over the whole traffic network, and even with the two major road schemes of WEL2 and NPR is proven to be unworkable. It is clearly in the wrong location.

3. WEL2/NPR re-routes congestion around the town creating new areas of delay, attracting through-traffic as well as drawing traffic into the town-centre. It does not improve the network, and is not shown to be of benefit to other areas of the town.
   Not even mentioned in the WYG report is the tripling of traffic in Hailey Road and, worryingly, parts of the scheme are not yet confirmed as deliverable in engineering terms. As infrastructure it has not been proven to benefit the wider community of Witney.

North Witney Action Group 2015

Appendix C

North Witney Action Group FOI Request Docs (4)

Our reference: 7980 EIR

25 March 2015

Dear Mr Harrison,

Thank you for your request of 07 March 2015 in which you asked for the following information:

Page 14 Scenario 4, 3.15, this report refers to "the delivery of a West End Link 2 with higher capacity junctions at either end of the link".

I would like to see detail as to how this junction upgrade has been engineered.

Please find our response below, in blue:

The West End Link 2 and its junctions have not been subject to engineering design. The model allows for the theoretical input of junction capacity. The "increased capacity and optimised signals on WEL" as coded in Scenario 4 (in comparison to Scenario 3) are:

- Northern end junction of WEL with West End Road/Crawley Road – signals timings/stages/phases have been optimised so as to allow better junction performance and the saturation flows on the arms of the junction have been increased from an original range of 1159-1311 to 1800-2000 Passenger Car Units (PCUs) per hour.

- Central junction of WEL with the A4095 Burford Road/Mill Street - signals timings/stages/phases have been optimised so as to allow better junction performance.

- Southern end junction of WEL/Woodford Way with Welch Way - signals timings/stages/phases have been optimised so as to allow better junction performance and the saturation flows on the arms of the junction have been increased from an original of 1700 to 1800 Passenger Car Units (PCUs) per hour.

Internal review
If you are dissatisfied with the service or response to your request you can ask for an internal review as follows:

- Contact the Complaints & Freedom of Information team in Law & Governance : foi@oxfordshire.gov.uk
- Use the online complaints form on our website: www.oxfordshire.gov.uk/complaints
- Write to the Complaints & Freedom of Information team at the FREEPOST address:

OXFORDSHIRE COUNTY COUNCIL

Date: 19 March 2015
Our ref: 7952 FOI

Environment & Economy
Speedwell House
Speedwell Street
Oxford OX1 1NE

Sue Scane
Director for Environment & Economy

Mr David Condon
135 Vanner Road
Witney
OX28 1LQ

Dear Mr Condon,

Thank you for your request of 26 February 3015 in which you asked for a copy of the data document which was used in the preparation of the summary document "Tech Summary Report No. RT-A088094-01.

Please find our response below, in blue:

Please find enclosed two technical reports which were used to prepare the summary document 'Tech Summary Report No. RT-A088094-01 entitled, "7952 FOI Technical Note 003 – West Oxfordshire.pdf" and "7952 FOI Technical Note 003.1 – West Oxfordshire additional texts.pdf".

Internal review
If you are dissatisfied with the service or response to your request you can ask for an internal review as follows:

- Contact the Complaints & Freedom of Information team in Law & Governance : foi@oxfordshire.gov.uk
- Use the online complaints form on our website: www.oxfordshire.gov.uk/complaints
- Write to the Complaints & Freedom of Information team at the FREEPOST address:

  Corporate Complaints Team
  Oxfordshire County Council
  FREEPOST (RTLL-ECKS-GLUA)
  Oxford OX1 1YA

If you remain dissatisfied with the handling of your request or complaint, you have a right to appeal to the Information Commissioner at:

The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.
Telephone: 0303 123 1113 Website: www.ico.gov.uk

Our reference: 8113 EIR

07 April 2015

Dear Mr Harrison,

Thank you for your request of 01 April 2015 in which you asked for information about the West Oxfordshire Evaluation of Transport Impact documents.

Please find our response below in blue:

Having reviewed your inquiry I think the document quoted ("page 18, section 4.2 Next Steps") refers instead to a very similar document "Atkins Technical Note, Project: West Oxfordshire ETI, Subject: West Oxfordshire Draft Local Plan Modelling, Date: 5 Jun 2014".

Not all the Next Steps tests (listed on page 18 paragraphs 4.2) were carried out as listed:

The following Scenarios will be produced to test alternative sites to those identified by West Oxfordshire District Council (WODC):

- *Scenario 4: same as Scenario 1 Option A but with no development at North Witney;*
- *Scenarios 5a/b/c: same as Scenarios 3a/b/c but with optimised signals and capacities on WEL;*
- *Scenario 6a: same as Scenario 5a but with 1000 dwellings to the North of the A40 at Eynsham (behind current Tesco filling station) instead of North Witney; and*
- *Scenario 6b: same as Scenario 6a but swapping 1000 dwellings at Eynsham for 1000 at Hanborough Station.*

Of the tests listed only *"Scenarios 5a/b/c: same as Scenarios 3a/b/c but with optimised signals and capacities on WEL"* was carried out. This test, Scenario 5, is the subject of Atkins Technical Note, Project: West Oxfordshire ETI, Subject: Additional Tests, Date: 30 Jun 2014 (the document you originally quoted). This work is carried forward into the WYG Technical Note: Witney Development and Infrastructure Strategic Modelling Report No. RT-A088094-01, where it is renamed "Scenario 4a/b/c" on page 9 of this report.

Work to assess the other Scenarios listed (4, 6a, 6b) was not commissioned.

Internal review
If you are dissatisfied with the service or response to your request you can ask for an internal review as follows:

- Contact the Complaints & Freedom of Information team in Law & Governance :

OXFORDSHIRE COUNTY COUNCIL

Date: 17 April 2015
Our ref: 8085 EIR

Environment & Economy
Speedwell House
Speedwell Street
Oxford OX1 1NE

Sue Scane
Director for Environment & Economy

David Condon
135 Vanner Road
Witney
OX28 1LQ

Dear Mr Condon

Thank you for your request of 25 March 2015 in which you asked for a copy of the traffic flow figures for the roads in Witney for the period 2007 to 2030, that were used as a basis for the technical summary report number RT-A088094-01.

Please find our response below in blue:

Please see attached document titled, "8085 EIR Witney Technical Note Appendices 101014".

Internal review
If you are dissatisfied with the service or response to your request you can ask for an internal review as follows:

- Contact the Complaints & Freedom of Information team in Law & Governance : foi@oxfordshire.gov.uk
- Use the online complaints form on our website: www.oxfordshire.gov.uk/complaints
- Write to the Complaints & Freedom of Information team at the FREEPOST address:

  Corporate Complaints Team
  Oxfordshire County Council
  FREEPOST (RTLL-ECKS-GLUA)
  Oxford OX1 1YA

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The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.
Telephone: 0303 123 1113 Website: www.ico.gov.uk

Appendix D:

Hailey Parish Council submission on West Oxfordshire Local Plan 2031 consultation

Contents

1. Introduction

The new Local Plan sets out WODC's vision for West Oxfordshire up until 2031. This document primarily addresses the proposed development of 1,000 houses and associated infrastructure at North Witney within the Witney Strategic Development Area.

Hailey Parish Council (HPC) contends that the evidence provided in support of the North Witney development does not meet the full objectively assessed needs for both market and affordable housing, does not accord with NPPF, and consequently is unlikely to be found sound at examination.

Concerning the examination of Local Plans, Paragraph 182 of the NPPF sets out 4 criteria to be met for a plan to be found "sound" as follows :

"A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:

> • Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
>
> • Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
>
> • Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
>
> • Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework."

The background documentation associated with the North Witney proposal does not support the following statement on page 129 of the Local Plan:

> 9.2.47 In terms of deliverability, there are no known constraints in terms of land assembly to prevent the [North Witney] site coming forward and evidence prepared in support of the Local Plan[13] suggests that the scheme is a financially viable proposition.
>
> [Footnote 13 refers to Aspinall Verdi – SDA appraisal North Witney (2015)]

We demonstrate in this document that the above statement is incorrect. North Witney is not viable (according to WODC's own definitions) and a substantial number of associated infrastructure and other costs have been excluded from the viability assessment. Against this background we demonstrate that North Witney is neither deliverable nor the most appropriate strategy. We also contend that WODC has been remiss in not more seriously considering other reasonable alternatives as soon as they were aware of the magnitude of the North Witney viability issues.

2. DEFINITION OF VIABILITY

They WODC definition of viability is contained in Section 4 of the referenced Aspinall Verdi – SDA appraisal North Witney (2015) report:

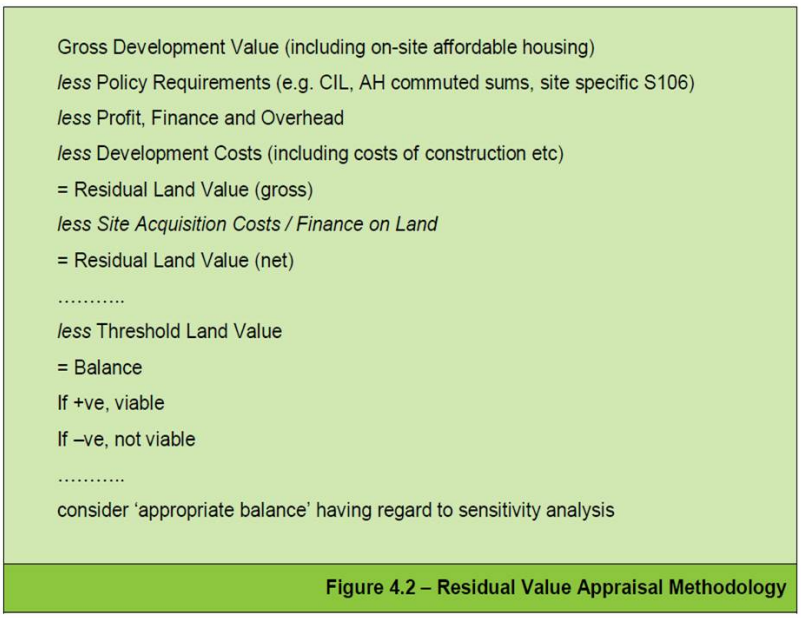

Figure 4.2 – Residual Value Appraisal Methodology

If the Residual Land Value (net) is less than the Threshold Land Value then the proposal is not viable. See Appendix 1 for full details.

3. THE VIABILITY TEST

Section 10 (Page 91 onwards) of the same report (full detail of this section provided in Appendix 2) contains the **VIABILITY RESULTS**:

SDA	Scenario	RLV £ (from Pro Dev appraisal)	Net Developable Area (acres)	RLV £ per acre	Comments
East Witney	A - CIL	£9,792,000	28.17	£347,611	viable
	B - S106	£9,624,000	28.17	£341,647	viable
REEMA Central	A - CIL	£6,328,000	17.05	£371,146	viable
	B - S106	£6,328,000	17.05	£371,146	viable
North Witney	A - CIL	£12,544,000	82.78	£151,537	positive RLV, but less than TLV (£225K per acre)
	B - S106	£12,192,000	82.78	£147,285	positive RLV, but less than TLV (£225K per acre)
Chipping Norton	A - CIL	£17,344,000	41.39	£419,046	viable
	B - S106	£17,160,000	41.39	£414,600	viable

According to WODCs own test of viability, North Witney is not viable. Repeated declarations that North Witney is viable are not correct. We contend that WODC Councillors were ill-advised when they recommended inclusion of North Witney in the Local Plan.

4. VIABILITY SUMMARY:

Section 10 (Page 91 onwards) of the same report

> 10.13 All of the appraisals, **except North Witney SDA**, result in a RLV per acre which is greater than our assumed greenfield TLV of £225,000 per acre. Accordingly these schemes are viable including the policy obligations.

> 10.14 The North Witney SDA is viable in that the RLV is positive, **but it does not generate enough land value to overcome our assumed greenfield TLV**. This is unsurprising given the very high costs that have been factored into the appraisal for highway infrastructure and flood risk mitigation. We would suggest that there is clearly scope for the scheme to be viable either on the basis of a lower TLV or through negotiation over the package of planning obligations to be sought e.g. the percentage of affordable housing which has a significant effect on gross development value.

So, a compromise is required in order to achieve viability. **This viability shortfall is not mentioned in the Local Plan document, indeed continued assurances have been given that North Witney is viable.** WODC's ability to manoeuvre is hampered by a number of its policies and previous declarations:

> North Witney was NOT included in the 2012 draft Local Plan primarily because of the landscape impact of the requested 1,500 houses. Its subsequent inclusion in 2014, following publication of the Oxfordshire SHMA, was conditional on the number of houses being reduced to 1,000 and a substantial S106 funding requirement totalling £38 million identified in the financial model (more on this later).
>
> The current Local Plan also identifies the desired levels of Affordable Houses – 40% in the case of North Witney.

We have created a copy of the financial model and tested the percentage of Affordable Housing that would be required against all of WODC's assumptions contained in their financial model.

In order to achieve viability against current assumptions the percentage of Affordable Housing would have to be reduced to 35% but:

5. DEVELOPER S106 COSTS INCLUDED IN VIABILITY ASSESSMENT

The following S106 costs are identified in the Aspinall Verdi – SDA appraisal North Witney (2015) Appendix 6 Page 269:

Jubilee Way roundabout (with Woodstock Road)	*£1,000,000*	
Woodstock Road roundabout (with Northern Distributor Road)	*£1,000,000*	
New Yatt Road roundabout (with Northern Distributor Road)		*£1,000,000*
Stage 1 Northern Relief Road		*£1,000,000*
Hailey Road roundabout (with Northern Distributor Road)		*£1,000,000*
Stage 2 Northern Relief Road		*£5,000,000*
Primary School		*£7,000,000*
River Windrush bridge (WEL2)	*£18,000,000*	
Flood alleviation		*£3,000,000*
TOTAL		***£38,000,000***

6. DEVELOPER COSTS NOT INCLUDED IN THE VIABILITY ASSESSMENT

The S106 / S278 costs identified in the model are incomplete.

In the case of WEL2 the cost of the River Windrush Bridge (only) is £18m. Note: this is a costing from work carried out in 2011 and a 2014 cost would be in excess of £20 million.

Proposal – add £2.5 million for inflation

Also the costs associated with the stretches of road at each end of the bridge to link with the Hailey Road / West End junction and the junction with the Mill Street have not been captured.

Proposal – add £2 million for these link roads

The junctions at each end of these stretches of road will have to be remodelled.

Proposal – add £1 million for each junction remodelling (total £2 million)

OCC identified the costs in column 2 in their response to a consultation development proposal (Application 14/01671/OUT) for 200 houses in Phase 1 of North Witney.

These numbers have been extrapolated to 1,000 houses in column 3 below.

OCC identified additional costs to be secured against the North Witney development	**200 houses**	**1,000 houses**
Identified costs	**£'000**	**£'000**
Dedicated A40 Bus lane from Eynsham to Oxford	349	1,745

Park and Ride at Eynsham for Oxford/ Witney	90	450
Expansion of permanent secondary school capacity	703	3,515
Expansion of Special Educational Needs	31	155
Library	41	205
Central library	8	40
Waste management	31	155
Museum resource centre	2.4	12
Adult Day care	42	210
TOTAL	**1,297**	**6,487**

SUMMARY OF UNIDENTIFIED COSTS IN THE FINANCIAL MODEL

Inflation costs for River Windrush bridge	£2,500,000
Link roads from bridge to West End and Mill Street	£2,000,000
Remodelling of junctions at West End and Mill Street	£2,000,000
OCC identified additional costs (see above table)	£6,487,000
TOTAL costs	**£12,987,000**

Although all of these costs were known to WODC but they were not inserted into the Aspinall Verdi financial model for North Witney.

If these costs are included in the model, the Relative Land Value (RLV) is not only below the Threshold Land Value but the RLV is negative making the proposal even less viable.

To bring the proposal back to full viability the percentage of Affordable Housing would have to be further reduced to 26% which is below even the lowest target level for Affordable Housing.

7. ERROR IN THE FINANCIAL MODEL?

In the financial model spreadsheet contained in the Appendix 6 – SDA Assumptions and Appraisals Page 269, the following line of cost appears:

> Marketing and sales incentives for private sales £6,159,645

This is a charge of 3% of the Market Value of the non-Affordable Housing. However this cost is not captured in the subsequent calculation of viability.

INCLUSION OF THIS CHARGE WOULD REINFORCE THE NON-VIABILITY OF NORTH WITNEY

8. UNCOSTED ADDITIONAL EXPENDITURE

i) WEL2 as a Flood barrier

Apart from the additional cost of adapting WEL2 bridge to incorporate a flood control mechanism, consideration has to be given to a re-modelling of the upstream capacity of the flood plain.

Section 9.2.43 of WODC's Local Plan states:

> *Importantly, the West End Link (bridge) could offer the potential to serve a 'dual' role not only in terms of transport but also in terms of flood risk mitigation – the concept of which has the support of Oxfordshire County Council and the Environment Agency. Any development proposal will need to be supported by a detailed Flood Risk Assessment (FRA).*

The cost of this flood barrier has not been identified and is not included in the viability appraisal but would worsen the viability case if the developer was required to make an additional contribution.

ii) Mains sewer upgrade

Policy WIT2 – North Witney Strategic Development Area (1,000 homes) Page 130

Land to the north of Witney to accommodate a sustainable, integrated community that forms a positive addition to Witney, including:

> k) connection to the mains sewerage network which includes infrastructure upgrades where required including any necessary phasing arrangements.

Ongoing discussions are considering whether the necessary new mains sewer to the Ducklington Works should be routed through or around the town centre. The cost will have to be borne by the developer.

Extract from Witney Gazette front page story dated April 9th 2015 – Appendix 3

> Becky Trotman from Thames Water said:
> In the case of new housing developments she said Thames Water works with the developer and the council to plan adequate sewage provision but developers are expected to pay for major improvements to the network.
>
> A report commissioned by Taylor Wimpey states Thames Water has advised systems sewers and the Dark Lane pumping station will not cope with waste from the new homes that it is investigating what upgrades will be necessary should the homes be approved.

The cost of this mains sewer has not been identified and is not included in the financial viability appraisal but would again worsen the financial case.

9. APPLICATION FOR OUTLINE PLANNING PERMISSION FOR 200 HOUSES (PHASE 1 OF NORTH WITNEY)

In November 2014 Taylor Wimpey applied for outline planning permission (Application 14/01671/OUT) for 200 houses on the North Witney site (identified as Phase 1 in the Local Plan). However the WODC Local Plan is unlikely to be in position until March 2016 (assuming no further delays) and if full planning permission is achieved prior to this date then Taylor Wimpey could sidestep the S106 requirement to contribute to the Northern Distributor road and the WEL2 bridge across the river Windrush.

This issue has already been identified by Oxfordshire County Council:

Extract from Oxfordshire County Council submission on Local Plan consultation dated 3 October 2014

> Due to the phasing of 200 dwellings between Woodstock Road and New Yatt Road to come forward before 2021 and the remainder of the site to come forward post 2021 consideration has to be given to the likelihood that these two sites will come forward through individual planning applications. Should this occur, the Woodstock Road site of 200 dwellings will only be required to mitigate its own impact arising from the proposed 200 dwellings. The County Council has not tested if 200 dwellings between Woodstock Road and New Yatt Road will trigger the need for the West End Link 2 (WEL2). A detailed transport assessment appraising the site will need to be submitted with the planning application. It is therefore a risk to the delivery of WEL2, if it is proven that the development of 200 dwellings in isolation does not

trigger the need for the road bridge. Should the Woodstock Road site be developed by one developer and the 800 unit site developed by a second developer, in real terms only 800 dwellings may be contributing to the funding and delivery West End Link 2.

If Taylor Wimpey manage to avoid contributing to the WEL2 crossing and the Northern Distributor road the whole premise of the North Witney proposal is destroyed as the remaining 800 housing development is even less viable.

10. SUMMARY

SCENARIO -->	A	B	C	D	E	F
	WODC model	As A with identified EXTRA COSTS (red)	As B with identified ERROR (in red)	As A with reduced % Affordable Housing to deliver 100%TV	As B with reduced % Affordable Housing to deliver 100%TV	As C with reduced % Affordable Housing to deliver 100%TV
Percentage of Affordable Housing	40%	40%	40%	35%	26%	20%
Market Housing	603	603	603	650	743	802
Affordable Housing	402	402	402	355	262	203
Sales Market Housing	£205,321,500	£205,321,500	£205,321,500	£221,405,018	£253,127,189	£273,248,696
Sales Affordable Housing	£57,978,450	£57,978,450	£57,978,450	£51,165,982	£37,729,476	£29,206,644
GROSS DEVELOPMENT VALUE	**£263,299,950**	**£263,299,950**	**£263,299,950**	**£272,571,000**	**£290,856,666**	**£302,455,340**
Plan App Prof fees, Stat planning + CIL	**£6,794,325**	**£6,794,325**	**£6,794,325**	**£7,256,047**	**£8,166,720**	**£8,744,364**
BUILD COSTS						
Site Clearance	£827,800	£827,800	£827,800	£827,800	£827,800	£827,800
House build	£102,024,183	£102,024,183	£102,024,183	£102,549,011	£103,584,151	£104,240,744
Site Specific S106	£10,050,000	£10,050,000	£10,050,000	£10,050,000	£10,050,000	£10,050,000
Build / Infrastructure / Ext Works Costs	**£112,901,983**	**£112,901,983**	**£112,901,983**	**£113,426,811**	**£114,461,951**	**£115,118,544**
Primary School	£7,000,000	£7,000,000	£7,000,000	£7,000,000	£7,000,000	£7,000,000
River Windrush bridge	£18,000,000	£18,000,000	£18,000,000	£18,000,000	£18,000,000	£18,000,000
Jubilee Way roundabout	£1,000,000	£1,000,000	£1,000,000	£1,000,000	£1,000,000	£1,000,000
Woodstock Way roundabout	£1,000,000	£1,000,000	£1,000,000	£1,000,000	£1,000,000	£1,000,000
New Yatt Road roundabout	£1,000,000	£1,000,000	£1,000,000	£1,000,000	£1,000,000	£1,000,000
Stage 1 Northern Relief Road	£1,000,000	£1,000,000	£1,000,000	£1,000,000	£1,000,000	£1,000,000
Hailey Road roundabout	£1,000,000	£1,000,000	£1,000,000	£1,000,000	£1,000,000	£1,000,000
Stage 2 Northern Relief Road	£5,000,000	£5,000,000	£5,000,000	£5,000,000	£5,000,000	£5,000,000
Flood alleviation	£3,000,000	£3,000,000	£3,000,000	£3,000,000	£3,000,000	£3,000,000
IDENTIFIED COSTS		**£12,987,000**	**£12,987,000**		**£12,987,000**	**£12,987,000**
Mareting & Sales incentive for private sales ERROR IN ORIGINAL MODEL - 3% of Market Housing Sales			**£6,159,645**			£8,197,461
External Works	£15,427,797	£15,427,797	£15,427,797	£15,506,522	£15,661,793	£15,760,282
Contingency	£5,142,599	£5,142,599	£5,142,599	£5,168,841	£5,220,598	£5,253,427
Professional Fee	£9,256,678	£9,256,678	£9,256,678	£9,303,913	£9,397,076	£9,456,169
Finance Fee	£1,028,520	£1,028,520	£1,028,520	£1,033,768	£1,044,120	£1,050,685
Build Costs	**£181,757,578**	**£194,744,578**	**£200,904,223**	**£182,439,854**	**£196,772,536**	**£205,823,568**
Disposal Fees	**£3,949,501**	**£3,949,501**	**£3,949,501**	**£3,949,501**	**£3,949,501**	**£3,949,501**
Marketing	**£11,294,168**	**£11,294,168**	**£11,294,168**	**£11,294,168**	**£11,294,168**	**£11,294,168**
Interest	**£1,380,866**	**£1,380,866**	**£1,380,866**	**£1,380,866**	**£1,380,866**	**£1,380,866**
Stamp, Legal & Agency Fees	**£815,360**	**£26,000**	**-£357,500**	**£1,210,658**	**£1,210,658**	**£1,210,658**
SITE PURCHASE - RELATIVE LAND VALUE	**£12,544,000**	**£400,000**	**-£5,500,000**	**£18,625,500**	**£18,625,500**	**£18,625,500**
TOTAL COSTS	**£218,535,798**	**£218,589,438**	**£218,465,583**	**£226,156,594**	**£241,399,949**	**£251,028,625**
PROFIT	**£44,764,152**	**£44,710,512**	**£44,834,367**	**£46,414,406**	**£49,456,717**	**£51,426,716**
% PROFIT (Fixed at this level)	**17.0%**	**17.0%**	**17.0%**	**17.0%**	**17.0%**	**17.0%**
THRESHOLD LAND VALUE	**£18,625,500**	**£18,625,500**	**£18,625,500**	**£18,625,501**	**£18,625,502**	**£18,625,503**
RLV AS % OF TLV	**67%**	**2%**	**-30%**	**100%**	**100%**	**100%**
	NOT VIABLE	**NOT VIABLE**	**NOT VIABLE**	**JUST VIABLE**	**JUST VIABLE**	**JUST VIABLE**
			NEGATIVE RLV	**BUT LOW %AH**	**BUT LOWER %AH**	**BUT V LOW %AH**

We contend that the North Witney proposal is not sound. As presented in the Local Plan, it is already non-viable and the additional costs and issues identified above remove any doubt:

i. North Witney fails the viability test in WODC's financial model above (A)
ii. The proposal fails to capture additional costs of just under £13 million (B)
iii. An error in the viability assessment excludes an identified cost of over £6 million (C)
iv. Estimates of substantial extra costs associated with a flood barrier on the WEL2 river crossing and an upgrade of the main sewer through Witney have not been made and are not included in the appraisal.
v. As identified by Oxfordshire County council, if the outline planning application for 200 houses in Phase 1 does not trigger the need for the WEL2 river crossing then the remaining 800 houses will have to bear the cost.

In our replication of the financial model, scenarios A, B and C are non-viable and scenarios D, E and F reduce the percentage of affordable housing to what we believe are unacceptable levels. Additionally we believe that WODC has not followed due process as we contend that as the various negative elements arose WODC should have urgently investigated alternative proposals that did not bear all of the burdens associated with North Witney.

Hailey Parish Council

May 2015

Appendix 1 Viability Assessment or Viability Test

West Oxfordshire DC Local Plan and CIL Viability Study - Final Report

February 2015 – Aspinall Verdi – Page 25 onwards

This is an extract of the whole of Section 4 of the above Final Report:

4 Viability Assessment

4.1 In this section of our previous EVA report (September 2013) we set out our detailed viability methodology, the relevant professional guidance and some important principles of land economics.

4.2 We do not repeat this again here and refer you to the previous report and Section 2 above in respect of changes to statutory requirements.

4.3 The general principle is that the CIL will be levied on the increase in land value resulting from the grant of planning permission. However, there are fundamental differences between the land economics and every development scheme is different. Therefore in order to derive the potential CIL and understand the 'appropriate balance' it is important to understand the microeconomic principles which underpin the viability analysis.

4.4 Figure 4.1 below, illustrates the principles of a viability appraisal.

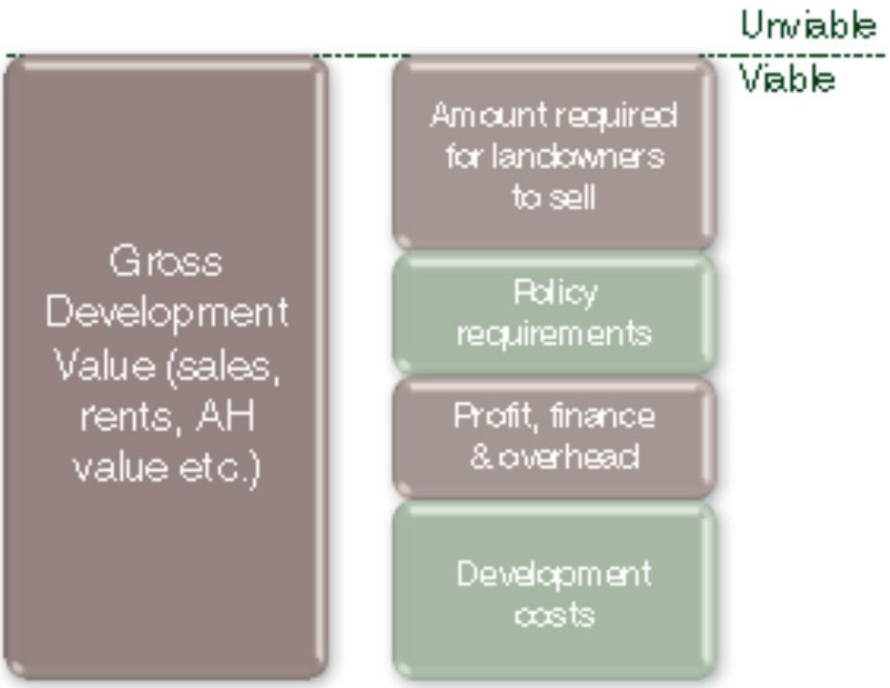

Figure 4.1 – Elements Required for a Viability Assessment (Harman)

4.5 Section 4 of our previous EVA (September 2013) describes each of the above components in detail.

4.6 We set out our specific assumptions for each sector of the property market in Sections 5 – 9 below.

Viability Method

4.7 Figure 4.1 shows the elements required for a viability assessment. A scheme is viable if the total of all the costs of development including land acquisition, planning obligations and profit are less than the GDV of the scheme. Conversely, if the GDV is less than the total costs of development (including land, S106s and profit) the scheme will be unviable.

4.8 Our residual development appraisals are structured to reflect all of the above elements and in a format that will be familiar to developers – i.e. follows the approach that developers would typically adopt to establish the Residual Land Value (RLV) of a site or scheme, as follows (Figure 4.2)

Gross Development Value (including on-site affordable housing)

less Policy Requirements (e.g. CIL, AH commuted sums, site specific S106)

less Profit, Finance and Overhead

less Development Costs (including costs of construction etc)

= Residual Land Value (gross)

less Site Acquisition Costs / Finance on Land

= Residual Land Value (net)

……..

less Threshold Land Value

= Balance

If +ve, viable

If –ve, not viable

……..

consider 'appropriate balance' having regard to sensitivity analysis

Figure 4.2 – Residual Value Appraisal Methodology

4.9 Once the RLV is calculated this is compared to the Threshold Land Value (TLV).

4.10 Where the RLV is greater than the TLV, the policy requirements are viable. Where the RLV is less than the TLV the policy requirements are not viable.

Where the RLV = TLV, this is the maximum level of viability.

Appendix 2 Viability of Strategic Development Areas

West Oxfordshire DC Local Plan and CIL Viability Study - Final Report

February 2015 – Aspinall Verdi – Page 91 onwards

Viability results for all SDAs are shown in 10.11. North Witney non-viability result and possible actions to achieve viability are discussed in 10.14 (all in red)

This is an extract of the whole of Section 10 of the above Final Report:

10 Strategic Development Area (SDA) Viability

10.1 This section deals with the specific viability of the Draft Strategic Development Areas having regard to the affordable housing levels and CIL rates considered above.

10.2 The Strategic Development Areas (SDAs) identified in the pre-submission Draft Local Plan comprise (1) East Witney, (2) North Witney (3) REEMA Central at Carterton and (4) Tank Farm, Chipping Norton.

10.3 We have not appraised the strategic site at East Carterton as this has now secured planning permission and is subject to a separate S106 negotiation.

SDA Assumptions

10.4 Appendix 6 contains our assumptions for each of the SDA sites. This includes the following breakdown –

- Net developable site area, density and number of dwellings
- Development phasing assumptions
- Affordable housing assumptions – % target / unit mix / tenure mix / transfer values
- Market housing assumptions – unit mix / market values
- Infrastructure / external works costs – these are shown explicitly where we have this information

10.5 For each of the SDAs, we have been instructed to appraise the scheme on the basis that the infrastructure is funded as follows:

- Scenario A – assuming that CIL is paid and therefore a reduced site-specific S106 payment of £10,000 per unit, and
- Scenario B – assuming a higher S106 payment of £16,000 per unit and no CIL.

10.6 These assumptions are also shown on the spreadsheets (Appendix 6).

Note that North Witney and Chipping Nortonwere not previously appraised in the September 2013 EVA.

Pro-Dev Appraisals

10.7 Appendix 6 also contains Pro-Dev appraisals for each of the SDA's. This is a proprietary development appraisal software package which we have used to calculate the residual value of the SDA.

10.8 The appraisals are based on the above scheme parameters with otherwise generic assumptions for consistency with the 100 unit typology and other residential typologies.

10.9 The appraisals include the relevant Affordable Housing policy target (40% in the medium value zone and 35% in the lower value zone). CIL is included at £100 psm on the private market housing.

10.10 We have calculated the residual value based on a blended profit of 17% on value which reflects a lower level of profit on the affordable housing.

Viability Results

10.11 For each of the SDA's we have calculated the residual land value (RLV) using Pro-Dev - including the relevant affordable housing and CIL assumptions. This is then compared to the TLV in order to determine whether the SDA is viable. The viability results are set out below (Table 10.1).

SDA	Scenario	RLV £ (from Pro Dev appraisal)	Net Developable Area (acres)	RLV £ per acre	Comments
East Witney	A - CIL	£9,792,000	28.17	£347,611	viable
	B - S106	£9,624,000	28.17	£341,647	viable
REEMA Central	A - CIL	£6,328,000	17.05	£371,146	viable
	B - S106	£6,328,000	17.05	£371,146	viable
North Witney	A - CIL	£12,544,000	82.78	£151,537	positive RLV, but less than TLV (£225K per acre)
	B - S106	£12,192,000	82.78	£147,285	positive RLV, but less than TLV (£225K per acre)
Chipping Norton	A - CIL	£17,344,000	41.39	£419,046	viable
	B - S106	£17,160,000	41.39	£414,600	viable

Table 10.1 – SDA Appraisal Results Summary

10.12 As can be seen from the above table, all of the SDA's deliver a positive RLV on both scenarios – where the infrastructure is funded by CIL (Scenario A) and by S106 (Scenario B).

10.13 All of the appraisals, **except North Witney SDA**, result in a RLV per acre which is greater than our assumed greenfield TLV of £225,000 per acre. Accordingly these schemes are viable including the policy obligations.

10.14 The North Witney SDA is viable in that the RLV is positive, but it does not generate enough land value to overcome our assumed greenfield TLV. This is unsurprising given the very high costs that have been factored into the appraisal for highway infrastructure and flood risk mitigation. We would suggest that there is clearly scope for the scheme to be viable either on the basis of a lower TLV or through negotiation over the package of planning obligations to be sought e.g. the percentage of affordable housing which has a significant effect on gross development value.

10.15 It is important that the Council is clear about which infrastructure is to be funded by the developer (through S106 or S106 and CIL) and which is to be funded by the Authority through CIL in order to avoid any "double dipping".

10.16 The Community Infrastructure Levy Regulations 2010 enabled land to be transferred to the charging authority in satisfaction of a CIL liability. The 2014 amendments have introduced provisions which also enable infrastructure to be provided in lieu of payment of the levy. However the application of these regulations is complex in relation to the S106 tests and also has implications for the Regulation 123 List.

10.17 The circumstances in which an infrastructure payment is likely to be attractive to a developer are where they would otherwise be unable to carry out the development until the infrastructure has been provided and so they want to be able to control delivery and timescale. But where, as will more often than not be the case, the infrastructure is necessary to make a development acceptable in planning terms, the CIL Regulations will not assist.

Appendix 3

Witney Gazette front page – 9th April 2015

Witney's sewers won't cope with new homes

Flooding: Cleaning up Witney High Street

First published Thursday 9 April 2015 in News by Martin Elvery, Reporter covering Witney and West Oxfordshire.

WITNEY'S sewers are in danger of backing up if they are overloaded with waste from new housing developments, councillors and residents have warned.
Their fears were raised as West Oxfordshire District Council approved a Thames Water strategy to deal with sewers backing up in Brize Norton on March 2, but admitted that there was no such strategy in place for Witney.

The sewers in High Street were blocked in February this year after a 'fatberg' was found clinging to a gas pipe that runs through the sewer pipe. Residents said this occurs on a regular basis and the sewers in Corn Street have to be cleaned out regularly.

West Oxfordshire District Council wrote to Thames Water and the Prime Minister and town's Conservative candidate David Cameron in 2014, asking for the sewerage system to be upgraded across the district.

Witney town councillor Alan Beames said a proper drainage strategy like that being planned for Brize Norton must now be put in place in Witney to prevent sewers clogging up when there is heavy rain or they reach capacity.

He said: "There are risks for Witney because There is insufficient capacity for sewage passing from houses in north Witney to the sewage works at Ducklington.

"The pipes passing under Corn Street have to be water blasted every other year because of blockages and the build-up of fat, and the pipes in High Street blocked up again recently.

"West Oxfordshire District Council's Local Plan highlights the risks in Witney because of insufficient capacity through the town from the sewage works from north Witney, through to the sewage works at Dark Lane, Ducklington.

"Equally, if there are further developments in North Witney and East Witney as planned, there will be an increase in the need for capacity.

"I believe we need a full assessment of the sewage capacity across the whole of West Oxfordshire."

Campaigners from the North Witney Action Group have long been against plans for building 1,000 homes on a greenfield site to the north of Witney, partly as on the grounds that it will overload the town's sewers.

Taylor Wimpey has lodged an application for 200 homes on the site which is yet to be approved.

Campaigner Stuart Harrison said: "The consequences of wanting to put 1,000 houses in the most remote part of North Witney – the furthest point from the sewage plant at Ducklington – means the sewage will be required to come through the middle of Witney through a pre-1950s system that couldn't cope.

"I would have to question the complete lack of joined up thinking of not including Witney in a drainage strategy."

Becky Trotman from Thames Water said: the firm has a rolling programme of putting in drainage strategies, starting with the worst hit areas first. She said the strategies are designed to help resolve problems of sewers backing up because of flooding or blockages in the worst hit areas. "We're prioritising the areas across our region for drainage strategies that have recently had problems with sewage flooding risk."

In the case of new housing developments she said Thames Water works with the developer and the council to plan adequate sewage provision but **developers are expected to pay for major improvements to the network.**

A report commissioned by Taylor Wimpey states Thames Water has advised systems sewers and the Dark Lane pumping station will not cope with waste from the new homes that it is investigating what upgrades will be necessary should the homes be approved.

Appendix 4

Hailey Parish Council submission to WODC September 2014

Consultation on WODC proposals for the North Witney site

Hailey Parish Council has consistently opposed development of this site over many years. However we recognise that there is a need to provide additional housing in the area and accept that some elements of the proposal could be enhanced to facilitate this need.

The Phase 1 proposal to build ~200 houses between New Yatt Road and Woodstock Road is not as sensitive as the proposals for the major part of the site. Equally we feel that the Phase 1 site could easily be extended as far as the junction between Jubilee Way and Woodstock Road – providing an estimated 2-300 additional houses.

Phase 2 & 3 proposals for ~800 houses between Hailey Road and New Yatt Road, however, remain highly sensitive.

We feel it is particularly important to stress to WODC planning department the extent and depth of concern expressed to us about this proposal. These concerns have manifested themselves through representations, demonstrations, consultations, surveys and a public meeting held in September with residents of both Hailey and North Witney. Additionally we believe the decision to prefer North Witney over South Witney is flawed – as evidenced in the table in Appendix 1. Our comparison of the two sites suggested that WODC might beneficially explore the possibility of development in South Witney.

<u>West Oxfordshire 'call for sites' exercise.</u>

The SHLAA para 2.11 refers to several 'call for sites' to, amongst others, Parish Councils. The current Parish Council, elected 3 ½ years ago, does not recall ever being asked to propose potential development sites. If correct, this calls into question whether due process has been followed.

<u>2012 West Oxfordshire Draft Local Plan</u>

The above draft plan did not include North Witney. Here is the explanation given by WODC:–

> *"Development to the north of Witney, whilst reasonably close to some existing services and facilities is some way distant from the town's main employment areas. Importantly parts of the site are within the floodplain and* ***the site is therefore sequentially less preferable to other site options*** *that are not affected by flooding. Recent landscape evidence also suggests*

there are concerns in relation to the scale of development that has been proposed and there are inherent complexities surrounding the delivery of the major transport infrastructure needed to bring the site forward."[1]

South Witney was also excluded from the 2012 draft plan because of unsustainable urban sprawl, car travel dependency and a poor level of residential amenity. All of these factors also apply to the North Witney site.

The 2014 SHLAA assessment of site 189 (South Witney) quotes all of the previous reasons plus "causing the coalescence of Witney with outlying villages"

The 2014 set of proposals reverses the 2012 proposal with **North Witney** no longer being the sequentially less preferable site of those considered. The summary in the 2014 SHLAA excludes many of the previous reasons for exclusion and simply states:

"Relatively sustainable location for urban extension development although not proximate to Witney's main employment areas. If the site were to come forward would need to deliver significant highway infrastructure including the West End Link and Northern Relief Road. However landscape sensitivities reduce the capacity of the development."

The evidence available has not changed substantially in the intervening period. The original 2012 proposal that North Witney is the least preferential site remains correct.

Of all options considered, South Witney is the only location with the capacity to replace the North Witney option. It is our view that WODC should review, compare and assess the two options in terms of their comparative merits. We have indicated several dimensions and criteria by which this could be delivered in the Appendix.

Appendix

Issue	North Witney	South Witney
No of houses	**1,000**	**1,750**
Sustainability Appraisal	The site lies between the Conservation Areas of Hailey and Witney, is relatively proximate to the Witney's main services and facilities although not as close as other options	The site is close to the main employment areas and includes the potential for a **larger scale development** (1,750 houses) including a mix of uses, a flat landscape with views generally

[1] West Oxfordshire Draft Local Plan October 2012 Clause 9.32

	to the main employment areas located in the south of the town. The route of the West End Link lies within and adjacent to the Witney Conservation Area. Overall it is considered that north Witney represents a suitable and sustainable option for growth in the longer term, **subject to sufficient landscape impact and flood risk mitigation** being provided and delivery of supporting highway infrastructure including the **West End Link, Northern Distributor Road** and any supporting measures.	screened by existing vegetation, potential to be served by a local bus service and the opportunity to provide significant **new business space**. The planned Downs Road junction with the A40 along with the existing Ducklington Road/ A40 junction would facilitate easy communication links although the A40 would present **a barrier to integration** for new development in this location. However it is likely to form **a separate entity** and a distinct identity to other existing developments and established communities in Witney.
Flood risk	Most of the site is located in Flood Zone 1 (low flood risk) with a small part located in Flood Zones 2, 3a and 3b (medium and high flood risk) as well as a flood warning area in the 'central valley'. This area is identified as being **at risk from surface water flooding.** The site is therefore **sequentially less preferable to other sites** that are located within Flood Zone 1. The Environment Agency (EA) emphasizes that there is a history of significant flooding in the area from the Hailey Road drain (main river) and that North Witney forms part of the catchment area for the Hailey Road drain. The site also captures drainage water from Hailey and Poffley End. The majority of the main river section of the Hailey Road drain is culverted and as such has a limited capacity. This was easily exceeded during the July 2007 event that led to an **alarming flow travelling overland down the Hailey Road at very high speed**. The EA also point out that although the scheme provides a significant flood risk benefit, consideration will need to be given to the **residual risk of structural failure of the earth**	A flat landscape with **little or no flood risk**.

	bunds to downstream properties. The site itself is less likely to flood than the properties to the south of the site - in and around Hailey Road.	
Infrastructure Roads	The site would need to deliver **significant highway infrastructure** including the West End Link and Northern Relief Road. Oxfordshire County Council (OCC) raised a number of queries and expressed concerns about the capacity of New Yatt Road and Hailey Road to accommodate the proposed development. They also highlight potential **impacts on the villages of Hailey and Crawley** and declare concerns that the proposed West End link is **unlikely to pass the sequential test** that applies to development in the floodplain.	The site will be relatively well connected with the existing A415 (Ducklington Road) and the forthcoming Downs Road junctions with the A40 and the Curbridge Road. **Minor works** would be required to facilitate links to the A40 junctions.
	Although OCC have no general transport strategy objections to the North Witney development, as a matter of principle they expressed concerns as to whether an acceptable transport solution is deliverable in the short to medium term, with recent traffic modelling suggesting that the proposed improvements to the A40 Downs Road junction and/or Shores Green west facing slips would deliver greater benefits for the wider highway network in Witney.	
Issue	**North Witney**	**South Witney**
Infrastructure Sewers	This area lies at the **furthest point** from the Witney sewage treatment works and existing sewers in the vicinity lack sufficient capacity. New sewers would need to be laid around or through Witney to serve a major development in this area causing significant disruption.	This area lies at the **closest point** from the Witney sewage treatment works and would not generate any disruptive activity in the centre of Witney.
Viability	The reduced number of houses and the substantial infrastructure loading raise **significant doubts about this projects viability.**	Absence of any major infrastructure burden presents the **opportunity to create a self-sustaining separate community** which could include sports facilities, Medical Centre, Village Hall and green spaces.
Landscape impact	The site is located in Hailey, not Witney. The village is just beyond the boundary of the **Cotswolds AONB** in an elevated and smoothly rolling	A flat landscape with views generally screened by existing vegetation

	landscape characterised as semi-enclosed limestone wolds (smaller scale) which are visually exposed and sensitive to development. The site is also within the **Wychwood Project area**. The Witney Landscape Assessment 2007 (Areas C2 and C3) notes a key sensitivity is to resist urbanisation between Hailey and Witney, particularly given the existing scattered development along the B4022. The small but distinct rural gap between the two settlements is vulnerable to erosion. The proposed 1,000 houses would **treble the population of Hailey** and close the gap between Witney and the Foxburrow area of Hailey. From higher parts of the site there are long views south and west across the town and the Windrush Valley. Views northwards towards the Wychwood Uplands are filtered by hedgerow trees and copses. **The site is part of the rural gap between Witney and Hailey, although Hailey itself is relatively well screened by topography and vegetation. The WLA identifies the area as of high importance and sensitivity.** Landscape sensitivities have reduced the capacity of development.	
100m Contour	SHLAA Site 275 – Land off Schofield Avenue – "In terms of minimising long distance landscape impact, it is important to keep development below the 100m contour in this area. The site would create intrusive skyline development. The well-established landscape buffer softens urban edge and should not be breached." **For some reason this principle has not been applied to the North Witney site**	
Proximity to main employment areas	Not proximate to Witney's main employment areas in Station Road and Downs Road	Reasonable access to major employment areas
Unsustainable urban sprawl	Not identified as an issue but could also be described as unsustainable urban sprawl. Would close the gap between Witney and the Foxburrow hamlet of Hailey and could lead to the coalescence of	Likely to result in unsustainable urban sprawl. Could lead to coalescence of Witney, Curbridge and Ducklington,

	Witney, Poffley End and Hailey itself.	
Commuting	Although not as proximate to an A40 junction, commuting would occur through New Yatt and along both the A40 and north along the A4095 through North Leigh, Long Hanborough and Bladon	Potential to encourage long-distance commuting by virtue of proximity to the A40 junction.
Car use	Development would encourage car use rather than more sustainable means of transport	Development would encourage car use rather than more sustainable means of transport
Traffic congestion	Would add to congestion in Witney, Hailey, New Yatt, North Leigh, Bladon and North Hanborough with a portion of out-commuters adding to A40 congestion	Benefits from direct access to the A40 via the planned Downs Road and existing Ducklington Lane junctions. Access to Witney centre benefit from improvements to the Station Road junction.
Issue	**North Witney**	**South Witney**
Poorly integrated with existing communities	Would swamp Hailey, treble its population and risk Hailey and the development coalescing with Witney	Barrier of the A40 will result in poor integration with existing communities but with a location of this magnitude a self-sustaining community could be developed.
Accessibility	Access to the larger portion of the site from the New Yatt road is blocked by land owned by the King's School.	No access issues identified

Hailey Parish Council

September 2014

Appendix 5

Hailey Parish Council submission to WODC July 2014

West Oxfordshire District Council Local Plan (Part 1) - Consultation

Following the publication of the 2014 Strategic Housing Market Assessment (SHMA) for Oxfordshire, we note that, in the case of West Oxfordshire, a significant increase in the number of new homes will be needed in the future. We have received the timetable for taking the West Oxfordshire Local Plan forward in light of the new SHMA.

We assume that, inevitably, you will be re-examining the 'North Witney' proposal by Meridian Strategic Land Ltd to build up to 1,500 houses[2] on sites 198 and 250[3] in the southern part of Hailey parish between the Hailey Road and Woodstock Road.

The SHLAA settlement summaries focus on towns and villages, and do not take into account the boundaries of a parish, or indeed all the hamlets and settlements that may fall within a parish such as Hailey. We would like, therefore, to point out that all the assessments of possible development to the north of Witney do not acknowledge that much of this area falls within the parish of Hailey, and could thus just as easily be called 'Hailey South'.

In several responses to LDF drafts over recent years we have consistently pointed out that the prospect of any development in Hailey South would be unwelcome to the residents of the parish; damage the rural character of the area; present significant flood risks; encroach on the gap between Witney and Hailey; encounter serious infrastructure challenges; and significantly increase traffic in the local area and the nearby villages. Hailey Parish Council notes the ongoing commitment of WODC to maintain the rural character and quality of life in the district (core policy 17), and would like to emphasise that this is extremely important to the residents of Hailey Parish as confirmed and evidenced in our own surveys and parish consultations.

The latest draft Local Plan (Oct 2012) **did not support the proposed development of sites 198 and 250 (Hailey South)[4]. In summary the reasons for exclusion were:**

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[2] Meridian Strategic Land Ltd North Witney leaflet references capacity for 1,500 new homes
[3] SHLAA Interim report January 2011 - Map 1a Winey North and East
[4] West Oxfordshire Draft Local Plan October 2012 – Scope for further expansion – 9.23 (Page 103)

Development to the north of Witney, whilst reasonably close to some existing services and facilities is some way distant from the town's main employment areas. Importantly parts of the site are within the floodplain and the site is therefore sequentially less preferable to other site options that are not affected by flooding. Recent landscape evidence also suggests there are concerns in relation to the scale of the development that has been proposed and there are inherent complexities surrounding the delivery of the major transport infrastructure needed to bring the site forward.

More detailed reasons for the failure to include the Hailey South development in the draft Local Plan are:

Land between Hailey Road and New Yatt Road is an area of undulating topography. It is predominantly arable farmland with an attractive small scale valley laid to pasture in the centre with strong hedgerows, hedgerow trees and copses of mature trees. Several historic farmsteads adjoin the site. There is an extensive network of footpaths and bridle paths through the area which are well used by the residents of Hailey parish, as well as residents of Eastfield, Early, and Vanner Roads.

The land lies above a major aquifer and along the central valley runs a small watercourse which runs south down to Hailey Road and **is a significant contributor to flooding in this area**. On several occasions in recent years Hailey Rod has been closed due to floods. The Environment Agency has investigated the feasibility of a series of storage ponds on this site but public funding has not been secured.

This area lies at the furthest point from the Witney sewage treatment works and existing sewers in the vicinity lack sufficient capacity. **New sewers would need to be laid around or through the town** to serve major development in this area.

From higher parts of the site (around the 95m) contour there are long views south and west across the town and the Windrush Valley. Views northwards towards the Wychwood Uplands are filtered by hedgerow trees and copses. The site is part of the rural gap between Witney and Hailey, although Hailey itself is relatively well screened by topography and vegetation. **The WLA identifies the area as of high importance and sensitivity.**

The town centre and the main employment areas to the south and west of the town are not however within easy walking distance and the site is relatively distant from the high frequency bus services along the A40 connecting to Oxford and settlements along that route.

Development **would require the provision of a new distributor road linking Woodstock Road to Hailey Road**.

The provision of the northern section of the West End Link, currently safeguarded in the Local Plan, is also **a prerequisite of development**, to limit the impact of any further growth to the north of Witney on traffic congestion in the Bridge Street area.

The sensitive integration of a distributor road and associated street furniture and lighting is likely to be more difficult to achieve. As part of the landscape setting the integrity of the central valley should be retained with appropriate flood attenuation provided to mitigate flooding in the Hailey Road area. **No development is appropriate to the north of Witney until it is clearly demonstrated that existing flooding problems in this part of the town can be satisfactorily resolved, along with a sustainable surface water drainage scheme.**

A small area of land adjoining Site 198 has also been suggested to be considered for development (Site 250). This land is subject to similar constraints as described above but due to the remoteness of this site, is not considered suitable for development. The site may however form part of the landscape framework for development north of Witney.

The position of Hailey Parish Council

Hailey Parish Council, reflecting the views of parishioners, and based on evidence gathered is opposed to development in the southern part of the parish/on the 'Hailey South' site, and has made this clear in previous statements to WODC. We are concerned to maintain the gap between Witney and Hailey, concerned about flooding risk, and the impact of development on traffic and transport in the immediate area, the surrounding villages to the north of Witney, and along the A40.

In addition we believe that the infrastructure burden identified above could lead to an undesirable reduction in the percentage of Affordable Housing to deliver the required Community Infrastructure Levy. We note that 40% of the housing requirement should be for affordable housing. Our assessment is that, given the significant burden of infrastructure costs, that an unacceptable compromise may be required by either WODC, or any developer considering this site. Other potential sites around Witney would require significantly less infrastructure costs.

Comment – Traffic congestion in Witney

As a market town, Witney provides almost all services and facilities to many outlying villages and hamlets as well as the 28,000 people living in Witney. The majority of employment locations, retail, health care, leisure and cultural facilities are located in the centre of Witney, south of the River Windrush with very little north of the river.

Access to these services and facilities for those living north of the River Windrush is via the Woodstock, New Yatt or Hailey Roads which all converge at the eastern end of Bridge Street. This situation is exacerbated by traffic looking to travel east or west on the A40 or south to Abingdon. Jubilee Way provides a bypass for eastbound Woodstock Road traffic but there is a rat run for south and westbound Hailey Road traffic via Crawley.

A partial solution may be the provision of a new distributor road linking Woodstock Road to Hailey Road (already identified). The identified West End link road, however, is too close to the existing Bridge Street crossing and simply provides another route to the centre of Witney. We believe that a more potent strategic development would be to provide a river crossing that links Hailey Road to either the Tower Hill roundabout on the Burford Road or the junction of Deer Park Road and Burford Road. This would provide an additional infrastructure requirement on any future developments north of the River Windrush.

Having carefully considered the most recent LDF we would stress that any development in the district, including the current proposals, will result in significant pressure on the road and transport system. It is likely, as the draft identifies, that major new developments will lead to a significant increase in 'out commuting'. The Key Findings on Housing Need Report (March 2014) identifies 'the major projects which will create new jobs include the Science Vale, the expansion of Oxford University, growth around Oxford Airport, and the eco-development at North West Bicester'.
Any development on the north side of Witney will lead to further use of the already heavily congested A40, and also on the A 4095 to Long Hanborough, Bladon and Woodstock. It is therefore important that improvements are made to the A40 and the roundabouts serving Witney. It is also important that measures are taken to prevent 'rat running' through the villages of Hailey, New Yatt, North Leigh, and Long Hanborough, and along inappropriate rural roads such as Crawley.

Appendix 6

Hailey Parish Council submission to WODC December 2014

This submission relates to an application for outline planning permission for 200 houses to be built on the North Witney site (identified in the Local Plan as Phase 1)

Hailey Parish Council (the Council) has always endeavoured to provide constructive comments when considering housing development proposals in the Parish. This is what we said during the recent consultation on WODC's draft Local Plan:

> *Hailey Parish Council has consistently opposed development of the North Witney site over many years. However we recognise that there is a need to provide additional housing in the area and accept that some elements of the proposal could be enhanced to facilitate this need. We have taken the consultation process seriously, reviewed all the relevant current and previous documents and also organised a well-attended public meeting at which parishioners expressed their views, and raised concerns. On this basis we would like to submit the following comments and suggestions:*

> ***The Phase 1 proposal** to build ~200 houses between New Yatt Road and Woodstock Road is not as sensitive as the proposals for the major part of the site. Equally we feel that the Phase 1 site could easily be extended as far as the junction between Jubilee Way and Woodstock Road – providing an estimated 2-300 additional houses. Concerns remain around the capacity of New Yatt road to handle the additional traffic.*
>
> ***Phase 2 & 3 proposals** for ~800 houses between Hailey Road and New Yatt Road, however, remain highly sensitive.*

Although the Council has always tried not to adopt the "NIMBY" stance in opposition to this development, it is finding it increasingly difficult to adopt a more positive stance following significant changes to Taylor Woodrow's plans.

Taylor Woodrow held a number of consultation exhibitions earlier this year where their outline plans for the site were displayed. However, since consultation the Concept Master Plan has changed in several critical areas – as outlined below. Also, there is very little mention that this proposal is Phase 1 of the proposed North Witney development.

1. **Northern Distributor Road**

In the exhibitions a strip of land between Woodstock Road and New Yatt Road was reserved to provide space for the Northern Distributor Road. In the latest plans this reserved strip has disappeared.

Concept Master Plan

July 2014 September 2014 November 2014

2. Estate Road layout

In both exhibitions the estate road layout did not facilitate through traffic between Woodstock Road and New Yatt Road. Initially one half of the estate exited via the New Yatt Road with the other exiting via the Woodstock Road. The second exhibition changed the emphasis so that a higher proportion of homes exited to the Woodstock Road. This strategy was supported by the Council.

However, officers from WODC felt that access roads into the development should be a through route to reduce the impact on Early Road.

The Council believes that creating a through route would attract traffic from Hailey Road and New Yatt Road wanting to avoid traffic bottlenecks in Witney. We also believe that the original strategy of a Northern Distributor Road would be better able to handle such traffic and avoid the safety issues of creating a major road through a housing estate.

3. Affordable Housing

The Exhibition literature stated "Approximately 40% of the homes would be made available as affordable housing." This has now changed to "Up to 35% of the proposed development will comprise affordable homes…" Again the stance has changed and the developer clearly seeks less than the 40% affordable housing required by WODC's Draft Core Policy 8 on Affordable Housing:

> *A2.12 This policy seeks a contribution to affordable housing provision where a net gain of one or more market homes is proposed. The draft policy seeks 40% affordable housing in Witney.*

4. Infrastructure

At the Public Meeting held to discuss the North Witney proposals (which included the above proposal) the main discussions were about the impact that the construction of more houses would

have on infrastructure and services and closing the gap between Hailey and Witney (which this proposal does not affect).

It was clearly stated by those who attended the Public Meeting that almost the entire infrastructure is overloaded.

- The creation of new links to the A40 will help in the south of Witney, but not the north where this development will occur. The North Witney transport strategy containing the Northern Link road and an additional river crossing should not be abandoned, as appears to be the case here.
- The sewage system will require major increases in capacity.
- More primary and secondary school places will need to be created and health services expanded to meet the growing demand.
- There is already a need for more sports facilities in and around Witney.
- Burial grounds in Witney (but not Hailey) are close to capacity and there are long waiting lists for allotments.

It is very easy to say that an additional 200 houses would have little impact on the above. However, we believe that firm plans should be made to identify the clear infrastructure requirements of the community, with developers being required to contribute accordingly. This was done for the North Witney proposal where the draft North Witney plan required the developers to pay for and contribute to:

A new crossing of the river in Witney (West End link Road)

A Northern link road connecting Woodstock, New Yatt and Hailey Roads

Flood attenuation of the sites

A new primary school

A new sewer connecting the site to the Ducklington works

Contributions to the development of sporting facilities, allotments, playgrounds, health centres etc.

As mentioned above the provision of land for the Northern Distributor road has been abandoned and there is barely any mention of most of the other requirements set out in the North Witney proposal. During WODC's draft Local Plan launch meeting, emphasis was made that Phase 1 of the North Witney proposal should not be detached from the overall plan. This is precisely what appears to be happening here as there is scant mention of that overall plan in these documents. This is what the developer's proposals say on infrastructure:

Boyer Planning Statement Page 24
Section 106 Heads of Terms

5.81 In accordance with the WODC's validation checklist, which requires Draft Heads of Terms to be submitted with any application for 'major' development, it is anticipated that the Section 106 Agreement will include the provision of contributions towards: Affordable Housing; Transport Infrastructure; Education; Public Open Space and Leisure; Residential Travel Plan.

Although Hailey Parish Council does not oppose these plans outright, we cannot support them unless the concerns we have raised above are successfully addressed.

Appendix 7

Hailey Parish Council submission to WODC October 2013

This planning application by the consortium promoting the North Witney development sought to build a concrete ramp on one of the approaches to the proposed West End Link bridge. The application was unsuccessful.

Planning Application 13/1274/P/OP by Meridian Strategic Land Ltd

Hailey Parish Council is aware that over many years different parties and their representative and associates have pursued plans for development in North Witney, and notes that despite this, WODC has not included any such plans in the current / most recent draft of the LDF.'

We believe that the above application is a cynical attempt to leverage acceptance by WODC of the previously unsuccessful plans for Witney North into the draft Local Development Plan.

We urge WODC to reject this application on the following grounds:

Existing planning policies

The current over-arching plan for the district is the West Oxfordshire Local Plan which was adopted in 2006 and covers the period up to 2011. References to the West End link road here are:

> 9.33 Two road proposals from the 1997 Local Plan remain to be built, i.e the Cogges Link Road and West End Link Road. Without an additional river crossing in Witney there is little opportunity to improve conditions in the Bridge Street area.
>
> 9.39 Detailed proposals will be prepared for public consultation when funding for improvement
>
> schemes has been secured.

WODC are in the process of replacing the Local Plan with a series of documents, collectively known as the 'Local Development Framework' or LDF. The most important LDF document is the new Local Plan which sets out an overall strategy for the District over the next 17 years.

Following the revocation of the South East Plan and the commissioning of a new Strategic Housing Market Assessment (SHMA) for Oxfordshire it has been decided not to progress the plan further

until this important piece of evidence is complete. The Meridian Strategic Land Ltd proposal for a development in the parish of Witney – known as the Witney North development – was not included in the most recent version of the draft LDF.

Although a West End link road is referred to in the 2006 plan it was not included in the latest draft LDF. We recommend that WODC awards itself sufficient time to consider the implications of the impending SHMA for Oxfordshire and delays consideration of this application until a final LDF is adopted.

This proposal is incomplete.

This proposal seeks outline permission to build a concrete ramp 70m by 45m (only) which might become part of a future West End link road. However there is no linkage to any other element of a West End link road and there is no commitment or promise to carry out any further work.

WODC cannot properly consider this application in isolation and it should be rejected until the complete set of proposals is submitted.

Possible future development is not included in this application

It is self-evident that Meridian Strategic Land Ltd will not provide the resources to construct any part of the proposed West End link road unless it is part of an agreement with WODC which provides planning permission to build substantial housing in Witney North. It is noticeable from this application that no mention is made of the Witney North consortium so where is the finance to support this initiative?

From Meridian Strategic Land Ltd.'s latest annual report - are there sufficient resources to fund this development?

Current assets £46,629

Current liabilities £54,703

Net Book Vale of minus £7,435 (an improvement on the previous two years).

They have cash assets of only £9,031 (already included in assets).

We propose that the application is rejected because of insufficient funding and the absence of financial backing.

Anti competitive

There has been no tender process to decide who will be given permission to construct the West End link road. If WODC grants this application it will have the effect of providing Meridian Strategic Land Ltd with a ransom strip of land that could block all initiatives to develop a West End link road at this location by any other consortium.

We therefore urge WODC to reject this application

Contamination of land

The report commissioned by Meridian Strategic Land concludes:

> "There is considered to be a moderate / low risk of contamination affecting the site."
>
> "It is recommended that intrusive ground investigations are undertaken to establish the presence of any Made Ground on site, together with chemical analysis of the soils and groundwater to quantify the above identified risks, prior to construction commencing. Any concerns highlighted by the investigation can be dealt with at a construction phase. It is otherwise considered that the site is suitable for its intended end usage of road construction."

We recommend that the intrusive ground investigation is carried out for the whole of the West End link road route before the granting of outline planning permission.

Ownership Certificates and Agricultural Land Declaration:

All Souls, Oxford's Certificate B not found in the online documentation**. Does this invalidate the application?**

Appendix 8

Part of Hailey Parish Council submission to the LDF consultation dated 12 December 2012

Hailey Parish Council notes the commitment of WODC to maintain the rural character and quality of life in the district (core policy 17), and would like to emphasise that this is extremely important to the residents of Hailey Parish as confirmed and evidenced in our own surveys and parish consultations.

We are therefore pleased to see WODC's identification of SDAs in West Witney, East Witney and Carterton, and we support these proposals.

In several responses to LDF drafts we have consistently pointed out that the prospect of any development on the North side of Witney would be unwelcome to the residents of the parish; damage the rural character of the area; present significant flood risks; and encroach on the gap between Witney and Hailey.

Our position is well known, reflects the views of our parishioners, and we do not wish to rehearse these at length again here. We are pleased to see that WODC has acknowledged these factors.

Having carefully considered the most recent LDF we would stress that any development in the district, including the current proposals, will result in significant pressure on the road and transport system. It is likely, as the draft identifies, that major new developments will lead to a significant increase in 'out commuting' and congestion on the A4095 as well as the A40 and other routes.

It is therefore important that improvements are made to the A40 and the roundabouts serving Witney. It is also important that measures are taken to prevent 'rat running' through the villages, and along inappropriate rural roads (core policy 24).