

NORTH WITNEY ACTION GROUP

West Oxfordshire Local Plan 2031 - Main Modifications

The following submission by the North Witney Action Group limits itself to the *Main Modifications* proposed in the re-submitted local plan November 2016. However, these comments must be seen as additional and complimentary to the submission already placed before the Inspector prior to the first Public Examination in November 2015.

Each comment is presented in a box supported by References to the Main Modification number or Policy (*in italics*)

Landscape, Character and Appearance

- Main 103, Policy WIT2 says -
"North Witney Strategic Development Area (~~1,000~~ 1,400 homes)"
- Main 101, 9.2.45 says –
"In terms of landscape impact, evidence (22) prepared in support of the Local Plan suggested that the originally proposed quantum of development (1,000 homes) was able to be accommodated on the site without undue adverse impact. Taking account of the additional development capacity provided by the inclusion of land west of Hailey Road, a modest increase in the extent of the developable area to the north (see Figure 9.4) and slightly higher density assumptions, it is considered that around 1,400 homes can be delivered on the site whilst ensuring an acceptable degree of impact in landscape terms..."
"(22) Kirkham Associates Landscape and Visual Review of Submissions for Carterton and Witney Strategic Development Options (2012)"

The North Witney SDA housing number has been increased from 1,000 to 1,400. This is a 40% increase, and NWAG contend that use of the phrases "...a modest increase...", "...slightly higher density..." and "...an acceptable degree of impact in landscape term." do not reflect the full impact of the increase, and lack any evidence to back up the statements.

- Main 101, 9.2.45 says –
"...A detailed landscape and visual impact assessment would however be required in support of any future application to determine the most appropriate form and layout of development which would ultimately influence final housing numbers."

WODC's latest 2012 Kirkham Report, specifically commissioned to support the local plan, estimated that the housing capacity for the combined areas of land C2/C3 would be 750-850 units. (LAN3, Section 'B', Summary of Recommendations).
With a total of three WODC Landscape Reports (1998 (Atlantic), 2007 (Hopwood) & 2012 (Kirkham)) all resisting urbanisation between Hailey and Witney, and the final one (Kirkham) recommending a very significantly lower housing capacity than 1,400 units, NWAG questions why a fourth report would give a different result now than in 2012?

- Main 9, para 3.2, 'Our Vision' policy says-
"...Towns and villages...will accommodate growth... without compromising their intrinsic character, appearance and setting,"
- Main 16, Policy OS2 says -
*"General Principles.
 All development should:*
 - *Be of a proportionate and appropriate scale to its context having regard to the potential cumulative impact of development in the locality;*
 - *form a logical complement to the existing scale and pattern of development and/or the character of the area;*
 - *Avoid the coalescence and loss of identity of separate settlements;*
 - *Be compatible with adjoining uses and not have a harmful impact on the amenity of existing occupants;*
 - *as far as is reasonably possible protect or enhance the local landscape and the setting of the settlement/s;*
 - *Not involve the loss of an area of open space or any other feature that makes an important contribution to the character or appearance of the area;*
 - *Not be at risk of flooding or likely to increase the risk of flooding elsewhere;*
 - *Conserve and enhance the natural, historic and built environment;"*
- Main 98, (Figure 9.4 – North Witney Strategic Development Area)
"Plan amended to show modest increase in extent of developable area on the main part of the site between Hailey Road and New Yatt Road and the expansion of the SDA boundary to include land west of Hailey Road. The developable area has also been redrawn to exclude the school land."
- Main 101 (9.2.45) says –
*"In terms of landscape impact, evidence prepared in support of the Local Plan suggested that the originally proposed quantum of development (1,000 homes) was able to be accommodated on the site without undue adverse impact.
 Taking account of the additional development capacity provided by the inclusion of land west of Hailey Road [100 houses], a modest increase in the extent of the developable area to the north (see Figure 9.4) and slightly higher density assumptions, it is considered that around 1,400 homes can be delivered on the site whilst ensuring an acceptable degree of impact in landscape terms.
 A detailed landscape and visual impact assessment would however be required in support of any future application to determine the most appropriate form and layout of development which would ultimately influence final housing numbers.*

There appears to be no new evidence to support WODC's assertion that the number of dwellings in (Kirkham) area C3 of North Witney SDA can be potentially doubled* over the 2012 Kirkham figure without having a significant effect on the intrinsic character, appearance and setting of the area. Indeed, the proposal now seems to move housing further into the green buffer zone. (Main 98, 9.4)
 WODC has completely ignored the findings of their own commissioned (Kirkham 2012) Report, and which they earlier relied upon. (Main 101, 9.2.45, note 22)

* Kirkham report, combined areas C2+C3 shown as 750-850 houses.
 C2 allocated 200; therefore C3 would be net 550-650 houses.
 Proposed new housing number for area C3 now 1200 houses, or 1100 should 100 units be built on land west of Hailey Rd, as this may be used for a new school.

Flood Mitigation measures

- Main 100, (9.2.42) says –
“The site promoter has identified land to the north of the SDA boundary which could be used for the purpose of off-site storage.”
- Main 103, WIT2 says -
“This may include consideration of ‘off-site’ solutions.”

These two statements appear to be vague references to the six attenuation ponds (60,000 cubic metre capacity) situated outside and to the north of the main SDA area on the 100metre contour, and first published on WODC’s website in November 2015 in WOLP36 (43163/C/013 - Drainage Strategy Plan). This doc (WOLP36), commissioned by Meridian Land, was ultimately revealed following the Inspector’s Q&A document IN004 and WODC’s subsequent response WOLP24.

It is unacceptable that WODC is still unable give more detail about a critical piece of flood attenuation infrastructure when this, the developer’s own Technical Report, was dated prior to the original submission of the Local Plan to the Inspector for examination. (WOLP36 - Richard Jackson Engineering Consultants, report dated 16/01/2015).

Transport, Infrastructure & Costs

- Main 64, Policy T2, says –
“The Council will continue to work in partnership with Oxfordshire County Council in relation to securing improvements to the A40 between Witney and Oxford. This will include the provision of an eastbound bus lane in conjunction with the proposed park and ride at Eynsham to help address congestion in the short to medium term, together with longer term improvements including the provision of a westbound bus lane from Oxford to Eynsham and dualling of the A40 between Witney and Eynsham.”
- Main 47, 6.13, says –
“We will also work with Oxfordshire County Council to identify funding for their long term strategy for the A40 which will involve dualling between Witney and Eynsham and a westbound bus lane.”
- Main 60, 7.27b, says-
“The results of the consultation and recommendations for taking the project forward were considered in May 2016 and it was agreed that the west bound bus lane would be taken forward together with additional dualling of the A40 between Witney and Eynsham. The anticipated cost of these improvements is £55m and there is no current funding available.”
- Main 217, Policy WIT3, Timescale & Comment, says -
“Due to the complexity of the site and lead-in times for large strategic sites it has been assumed that the site will come forward after 2021.”

The current estimated infrastructure costs required to build North Witney SDA according to a note received in Nov 2016 from WODC's Planning Policy Manager are –

- Northern Perimeter Road	£6m
- West End Link Road	£23.2m
- Foul Water Drainage Improvements	£3m
- Flood Alleviation	£3m
- Highway Improvements	£4m

	£39.2m

The North Witney SDA (incl West End Link) requires extraordinarily expensive infrastructure - *"Due to the complexity of the site...."* (Main 217)

At £39.2m, this is a wasteful use of infrastructure funds, and shows a lack of joined-up thinking by WODC as well as non-cooperation with OCC in its endeavour to raise the £55m (Main 60) for A40 improvements. These improvements would be of major benefit to Witney residents not only in their commute to and from Oxford, but also locally. Firstly as recognising the A40 between Shores Green and Down's Road junctions as the 'Witney by-pass' between east and south housing areas, and secondly as a designation of the west side of Witney as the main area of employment.

- Main 113, 9.2.58 says –
"West End Link Road (WEL) – the provision of a new road link between Woodford Way and West End creating a second river crossing for Witney. This will be facilitated by new development including primarily delivered as part of the proposed North Witney Strategic Development Area (SDA)."
- Main 93, 9.2.34a says –
"9.2.34a The Shores Green improvements allow traffic using the junction to travel both east and west. A financial contribution towards the slip roads has already been secured from another housing development north of Burford Road in Witney and the East Witney SDA provides another mechanism by which the slip roads can be delivered. The development itself is able to deliver the 'off-slip' through a planning obligation and an appropriate financial contribution will be sought towards the 'on-slip' potentially as part of a wider strategic transport infrastructure fund/package for Witney."
- Main 61, 7.33 says –
"LTP4 envisages that these schemes will come forward sequentially with the Ducklington Lane improvements happening first (now completed) followed by the A40/Downs Road junction followed by the Shores Green Slip Road scheme and associated improvements at Bridge Street. Whilst not specified in LTP4, the inference is that the West End Link and Northern Distributor Road would follow on from these other strategic highway improvements."

WODC continues to position WEL as the second river crossing for Witney, when OCC's LTP4 determines that the Shores Green junction upgrade becomes the second river crossing (OCC LTP4 WIT1), with WEL not even specified in LTP4 WIT1. Furthermore, Shores Green upgrade is not currently fully funded (9.2.34a), and OCC would look to WODC to assist in providing funding.

Additionally, the Inspector (Frances Mahoney) at the Gladman/Burford Rd planning appeal (14/1215/P/OP) in her final report, para 318 wrote, *"The Council is clearly committed to the SGSR scheme and sees it as a primary solution to the problem of air quality and highways congestion within Witney."* The Secretary of State granted planning permission and agreed a £1.16m contribution towards the SGSR scheme. (Para 16)

Alarming, Main 113, 9.2.58 removes the onus from the developers of North Witney SDA from their responsibility of delivering WEL to a mere facilitation role. In doing so WODC has left itself vulnerable to the full funding of the (currently) £23.2m West End Link Road which is *"needed to enable the proposed development of land to the north of Witney"* (Local Plan CD1, 7.36)

- Main 104, Alternative Options, 9.2.49, says-
"In terms of alternative strategic directions of growth at Witney, several other options have been considered including land to the south and land to the north east of the town as well as land to the west of Downs Road. Having regard to the overall housing requirement and evidence prepared in support of the Local Plan these sites have not been allocated at this point but will be re-considered as part of any subsequent review of this Local Plan."

Indeed, WODC has already revealed a solution in MAIN 104 to the weakness of continuing to include the remote and *"complex"* (MAIN 217) North Witney SDA when it commits to considering several other sites (including the strategically better located South of Witney SDA) at a subsequent review of this Local Plan.

Note: On 10th October 2016, the Lowlands Planning Committee gave permission for 257 houses at the *land to the west of Downs Road* site (Application No 16/01450/OUT).

- Main 20, OS5 – *Supporting Infrastructure* says -
*"Where necessary and viable, new development will be required to deliver, or contribute towards the **timely** provision of appropriate supporting infrastructure...."*
[Additional word in bold and italics – **timely**]
- Main 102, 9.2.48, says –
"allow ~~time~~ for the West End Link element of the scheme to be phased in appropriately as an integral part of the development. ~~ahead of the majority of development coming forward.~~"

Main 20, Policy OS5. The use of the newly added word *"timely"* in relation to the provision of supporting infrastructure is greatly concerning.

Previously a start had to be made on infrastructure *"ahead of the majority of development coming forward."* (Main 102, 9.2.48), but, for whatever reason, this commitment has now been fully deleted.

Clearly there is now a probability that vital infrastructure will be significantly delayed. Worse still, there is a real possibility that it (or parts of it) will not be built at all post the starting of the development. NWAG says this situation cannot be allowed to prevail.

Transport and Traffic analysis

Atkins Technical Note, Evaluation of Traffic Impacts, 4.2, Table 13 says -
“West End Link 2 (WEL2) - standard junctions - West End to Mill Street link road/bridge”

This reference to the use of ‘standard junctions’ (and thereby excluding Higher Capacity Junctions) does not appear to be mentioned anywhere else in any of the latest submitted evidence, including ‘Main Modifications’.

Given that WODC TRA1 contains up to 50% of text and data comparing ‘Higher Capacity Junctions’ (HCJ’S) with ‘standard junctions’, NWAG is confused as to whether WODC has now permanently abandoned the idea of using HCJ’s at each end of WEL, or whether they have been temporarily excluded from the Evaluation of Traffic Impacts report for some other ungiven reason(s).

This is of critical importance because, as pointed out by WODC in TRA1, using HCJ’s has a significant impact on traffic around the WEL area, and therefore would be expected to have a direct bearing on the outcome of tables 8 and 9 in the Evaluation of Traffic Impacts report.

A Freedom of Information Request was submitted by NWAG to OCC on November 17th 2016. It requested a copy of the raw data used to produce the traffic flow in the Evaluation Report in order to establish the situation within Witney around the WEL area.

The response (11030 EIR - Traffic Flow Figures) received from OCC dated December 14th 2016 was-
“The report/work so far has not included outputting the raw data from the traffic model, which would incur a significant fee to extract.”

This is an extremely unhelpful response in a situation where NWAG are attempting to analyse data presented in a macrocosmic format, where multiple options have been added, dropped and altered and where close analysis of the raw data has previously revealed a quite different outcome than the technical reports would indicate.

Furthermore, it is beginning to become apparent that the important decisions being made on critical issues (eg infrastructure, sequencing and timing) are being relaxed by WODC, in order to accommodate the flawed North Witney SDA.

CONCLUSION

NWAG are disappointed that their endeavours to provide informed comment to WODC in this consultation period are being considerably hampered by the opacity of their documentation.