

11.1

Is the Witney Sub-Area Strategy (policy WIT4), including in relation to employment land (i.e. 20ha to the west of Witney) and transport proposals, positively prepared, justified and effective?

1.1 NWAG would submit that Policy WIT4 in relation to employment and transport is not positively prepared, justified nor effective whilst the plan continues to include the remote North Witney SDA.

1.2 The site, entirely in the Parish of Hailey and part of the Wychwood Project landscape, is geographically the furthest point possible from the 20

hectares of employment land identified within WODC's defined Witney Sub-Area.

1.3 During Stage 2, WODC re-emphasised their commitment to *"the west being the appropriate solution as the significant employment area"*. Indeed, Mr Hughes (WODC) underlined the importance of the new/improved Downs Rd/A40 junction as access for this employment area. This strategic statement confirms that the A40 between the Shores Green and Downs Road junctions becomes the principal access point to the 20 hectares of employment land.

1.4 The strategic importance of the enhanced junctions along the A40 in the Witney Sub-Area for movement to and from employment areas further undermines the need to pursue the flawed and costly WEL2, confirming Shores Green junction as the crucial eastern gateway to what OCC refer to in LTP4 WIT1 as the *"second river crossing"*. This compared to WEL2 which is only given *"feasibility and viability assessment"* status.

1.5 It is worth noting that in the successful 2014-16 Gladman planning appeal (WODC App No 14/1215P/OP) to build 270 houses off the Burford Road just a few hundred yards from its proposed junction with WEL2, the Inspector Ms Jean Nowak says *"...the measure to mitigate the impacts of this appeal in respect of air quality and highways is the contribution of £1.16m towards the Shores Green scheme"*. WEL2 gets nothing.

1.6 The critical importance of Oxford as an employment provider must be considered when site specific developments are considered in relation to the A40 Science Transit Phase 2 – Local Growth Deal which has been *"provisionally awarded £35m to expand the integrated public transport system along the knowledge spine and deliver major enhancements to the A40 strategic route"*

<https://www.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/roadsandtransport/transportpoliciesandplans/OptionAssessment.pdf>

Dualling the A40 from Witney to Eynsham heads the list of proposed schemes in the second phase. (WOLP53, SoCG, 3.9)

1.7 Additionally, the Oxfordshire City Deal (potentially £1.2bn of investment over five years) to create 50,000 jobs in the County, needs major road network upgrades to be effective.

http://www.oxfordtimes.co.uk/news/headlines/10972864.CITY_DEAL_Government_claims_investment_of_1_2bn_in_county_could_lead_to_50_000_jobs_and_help_homebuilding/?ref=rss

1.8 North Witney SDA commits nothing to the above schemes and would consume S106 and CIL money entirely in attempting to pay for the achievement of complex infrastructure, but without providing any advantages to the wider community.

11.2

Is the Witney Town Centre Strategy (policy WIT3) positively prepared, justified and effective?

2.1 Policy WIT3 says “*Conserving and enhancing the special interest of the Witney Conservation Area...*” This is threatened by OCC’s misinterpreted analysis of the impact of WEL2 which NWAG have shown draws traffic into the Conservation Area. The plan’s support of this development using OCC traffic data (TRA1) is factually challenged in NWAG’s 2015 submission, Appendix B, which closely analyses High St traffic levels in Table 11.

2.2 NWAG’s analysis in relation to access into Witney Town Centre through Bridge Street, and thus access to the Town Centre is relieved only through the building of Shores Green on its own. Subsequently adding WEL2 is proven to increase traffic levels above current levels thus retaining its expensive inclusion for the sake of the NW SDA, thereby threatening WIT3’s statement to maintain and enhance Witney’s Conservation Area.

11.3

Are the following housing allocations soundly based; are the policy criteria set out in the relevant policies justified and effective; and are the assumptions relating to viability and delivery within the next five years and across the plan period as a whole realistic?

• North Witney Strategic Development Area (WIT2)

3.1 NWAG submits that WIT2 and, in particular, the continually changing stance by WODC to justify the inclusion of NW SDA, fundamentally makes the Policy unsound. Pragmatic and in some cases unidentified locational changes (e.g. flood water storage WIT2 **i** & **j**) within and outside the SDA to fit the justification are not supported by new analysis or research, and indeed ignore existing evidence. This unstrategic approach can be seen in the following seven areas.

3.2 Landscape

In the case of WODC ignoring their three earlier landscape reports (LAN7, 6 & 3), their response is to commission a fourth landscape report (MM 9.2.45) to justify this shifting position. Ignoring the consistent findings of those three landscape reports go counter to justifying paras **e**, **f** & **g** in WIT2

3.3 Housing Numbers

At Stage 2, in reference to housing numbers being increased from 1,000 to 1,400, Mr Hargraves (WODC) described this as a “*minor modification*”. Indeed, in the Main Modifications submission the 40% increase is quoted as “*a modest increase*”, “*slightly higher density*” and “*an acceptable degree of impact in landscape terms*”.

The inclusion of a third parcel of land into the SDA to the west of Hailey Road throws up further uncertainty on the exact allocation of housing numbers. If this uncertainty now means parcel C3 carries 1,100 houses, then this runs substantially contrary to WODC's LAN3 estimated housing capacity of 550-650. (See NWAG Main Mods submission, Main 101, Box 3).

3.4 Flooding – North Witney SDA Policy WIT2 i

Concerns over the flood risks introduced by both the construction of the SDA and WEL2 are factually documented in NWAG's original 2015 submission and 2016 Main Modifications submission. However, serious questions have arisen since the original WODC Local Plan submission to Mr Emerson which underlines the unsoundness of Policy WIT2.

The NWLC's own North Witney Flood Risk Assessment (WOLP36) proposes six flood attenuation ponds allocated outside NW SDA. Although the location is identified as northeast of the SDA, these have not been acknowledged by WODC in any mapping or public consultation exhibitions.

WODC's Main Modification glibly addresses this critical issue to the safeguarding of Witney to a flood mitigation phrase of *"This may include consideration of 'off-site' solutions."* (NWAG Main Mods Box 4). Flood mitigation is unquestionably a major issue for this SDA on Witney, and particularly for the people living in Eastfield Road and Hailey Road. How can it be that WODC, at this late stage, appear to have no published plan for dealing with 63,000 cubic metres of water?

3.5 Flooding – River Windrush Policy WIT2 j

WODC continues to promote the claim that *"Importantly, the West End Link could offer the potential to serve a 'dual' role not only in terms of transport but also in terms of flood risk mitigation"* (Local Plan 9.2.43), whereas in WOLP35 4.5, 2 (page 25/38 - bridge scenario B), & 5.3.5, this report says *"no flood alleviation opportunities to downstream areas can be offered by reducing the bridge openings"*.

NWAG is extremely concerned at the apparent lack of transparency and preparedness with regard to flood planning for North Witney SDA, the River Windrush at WEL2 and particularly for residents living in the heavily populated area of central Witney – Bridge St, West End, and Mill St – which experience frequent and historical flooding. (NWAG 2015 Submission, pages 9-10 'Regular Flooding')

3.6 Mains Sewage

A further strategic weakness of the inclusion of this SDA is the need to connect to a main sewerage network for which the plant is at the furthestmost point from the SDA. This will require several years of disruption through the town, and no costings can be found in support of WIT2 k.

The 300mm old clay main line through the centre of Witney High St is frequently blocked. At the time of writing, contractors were last called to attempt to unblock the inadequate system on the night of June 13th 2017.

3.7 The Masterplan

WIT2 offers in **ai** a completely unsubstantiated stand-alone statement that comprehensive development will be led by an agreed masterplan. This is open-ended and makes no commitment to who is party to the agreement, the cost, the timetable or accountability. It is deeply concerning when linked with the watered-down commitment to who pays for the infrastructure, and when. WODC must be held to account for ensuring infrastructure is built in advance of development and provide guarantees for any flood alleviation maintenance.

During the Stage 2 Hearing, and in answer to the concern that development may come before infrastructure, Ms Hornsby QC for WODC made the commitment that *“the policy has to make sure that doesn’t happen.”*

3.8 Self-build, WEL2, WIT2 n

Policy WIT2 has further been undermined by the request of NWLC at Stage 2 of the Hearing when they asked for the SDA to be relieved of the site-specific 5% self-build requirement. It should be noted that the NWLC were the only developers to make this request and were not supported by those represented in the room. Clearly the need to claw back 70 units through being released from the 5% requirement speaks volumes on the precarious nature of the overall viability of the site, and therefore the potential vulnerability of leaving the site within the plan.

