

Submission by North Witney Action Group (NWAG) to PO 010 Consultation on further evidence submitted by WODC for the Local Plan

Sustainability Appraisal (SA) Further Addendum Report (including Appendix F added November 27 2017)

Analysis by NWAG of the updated SA Report submission questions the subjectivity of WODC's conclusions in order to justify their continuing promotion of the North Witney SDA (**NW**) over the advantages of Land South of the A40 (**LSA40**) within the Witney sub-area.

Detailed analysis of the **SA Further Addendum Reports October 2017** for both **NW & LSA40** sites issued November 13 2017 reveals significant disparities in nine of the 16 **Site Options SA Objectives**.

NWAG submits the following challenges to the weighting which, when compounded, would place Land South of the A40 (**LSA40**) ahead of the proposed North Witney (**NW**) SDA.

3. THRIVING & INCLUSIVE COMMUNITIES

The downgrading of **LSA40** is highly subjective. No '*inclusive community*' emphasis has been made on **LSA40**, despite its close proximity to large areas of employment and walking distance over a new bridge to three major supermarkets. In addition is the physical shape of the comparative sites which, for **NW**, reaches further and deeper in to the parish of Hailey whereas **LSA40** is a more compact linear site around the curtilage of Witney.

NWAG also questions WODC's interpretation of the centre of the town for measurement purposes, which, by all practical definition through recent developments, including three supermarkets, hotel and fast food outlets, must be seen as the Market Square and not the junction of Welch Way and High Street.

4. IMPROVE EDUCATION & TRAINING

The written commitment by the **LSA40** site promoters in LVA2017 to the provision of a 2FE primary school, an upgrade not acknowledged by WODC in their revised submission, is further enhanced by a commitment to leisure and recreational facilities (again not acknowledged), and not reflected in the weighting. These commitments do not warrant **LSA40** being downgraded below **NW**.

6. ACCESSIBILITY TO SERVICES & FACILITIES

It is critical when assessing this category that decisions being made on weighting relate only to matters as instructed.

“The decision aiding questions for this SA Objective [6] relate to transport matters rather than the provision of facilities and services.”

Opening sentence, Sustainability Appraisal, Further Addendum Report, NTS, 2017. (SA)

NWAG has analysed OCC’s WYG Witney Transport Strategy Refresh A101212 (**TRA7**), one of the documents added to the WODC Local Plan library at close of business on Friday July 7th post the date line for the consultation period, and subsequently withdrawn at the beginning of Stage 3 on Tuesday July 11. **TRA7** was re-introduced to the Local Plan library on November 8 and confirmed on November 27 as included in the evidence base of the consultation.

In making **TRA7** subject to WODC’s *further evidence*, NWAG submit the content only serves to reinforce the overwhelming traffic statistics against the inclusion of the North Witney **NW** SDA and the West End Link Road (**WEL**) in the Local Plan.

Specifically:

- New Yatt Road would see traffic increase by **301** movements over DM (Do Minimum) **+67%**
- A4095 Wood Green (Woodstock Rd) would see an increase of **93** movements **+13%**
- Crawley Road traffic would increase by **279** movements **+78%**
- Hailey Road traffic would increase by **1062** movements **+160%**
- The three main roads in north Witney, Hailey Rd/New Yatt Rd/A4095 Wood Green would see a combined increase of **1,456** movements **+80.3%**

- In contrast, Bridge St would see a reduction of **just 389** movements **-10.5%**
- West End Link Road (within 380 metres of Bridge Street) adds a further **+1,716** movements, within a 12 hectare Conservation Area bounded by Bridge St/West End /Mill St and WEL showing an overall net increase in traffic movements of **+813**, equating to an increase (over DM) in traffic movements overall of **+13.3%**

OCC’s concerns on these traffic survey statistics are laid out on pages 97 & 98 of 480 in WODC’s Consultation Paper, although WODC appear to seek to minimise these concerns, mentioning only the minor reduction in Bridge St traffic.

In **TRA7**, OCC interprets these traffic statistics as:

- Potential capacity issues in New Yatt Road and Hailey Road
- Impact on the villages of Crawley and Hailey
- Concerns on acceptable transport solutions in the deliverability in the short to medium term
- Greater benefits would be achieved from the A40 junctions at Downs Road and Shores Green
- WEL is unlikely to pass the Sequential Test

These OCC concerns, backed by **TRA7**, fundamentally add up to the impossible implementation of the physical infrastructure challenges which, together, soundly place the North Witney SDA beyond any practical reach of implementation over the lifetime of the plan. Furthermore, on this evidence, **WEL** also does not qualify to pass the Exception Test when there are clear alternative sites to **NW** both in the Witney sub-area and West Oxfordshire generally.

The weighting of **LSA40** against **NW** is fundamentally incorrect and is a disconnect between value scored and the modified text. The A40 is the “*key transport corridor*” (WODC) and to state therefore that the **LSA40** sites’ adjacent location to the A40 is a “*negative effect*” creates a double standard, especially when the proximity to the A40 is promoted prominently with the Government’s support elsewhere and in particular the Eynsham Garden Village. With the additional infrastructure of a bridge and a park & ride facility, NWAG contends **LSA40** far outweighs and therefore outscores the remote **NW** site with its infrastructure demands, costs and challenges as highlighted by OCC and NWAG’s analysis of **TRA7**.

9. AIR POLLUTION & AIR QUALITY

When comparing the completion of the two comparative sites of **NW** & **LSA40**, the new road structures required to deliver **NW** produce an overall increase in traffic of **+13.3%** representing **+813 net additional vehicle movements** (See **TRA7** analysis in category 6 above) enclosing just 12 hectares within the Witney Conservation Area boundary of **WEL** and the ‘Windrush in Witney Project Area’, West End, Bridge Street and Mill Street.

However, WODC have only opinionated as to the effects of **LSA40** on traffic in Witney in their modified submission, commenting that there is “*potential for a residual negative effect.*” WODC therefore has no grounds whatsoever to load the weighting of **LSA40** with a Minor Negative, against a Minor Positive for **NW**.

Furthermore, “*the NO₂ level in 2015 at Witney was 23.1 µg/m³.....well below the annual mean NO₂ objective of 40 µg/m³.....the lowest recorded concentration since at least 2010*”, (page 28 of 45), according to WODC’s current 2016 Air Quality Annual Status Report* in fulfilment of Part IV of the Environment Act 1995, a WODC document not submitted to the Local Plan Examination in the revised October 2017 SA.

This critical evidence omitted from the SA appraisal offers compelling evidence against **NW** and the need for **WEL** on air quality grounds. Not updating the 2013 Air Quality Annual Status Report which was part of WODC's original evidence in support of **NW** with the 2016 Report, highlights the continuing selective bias by WODC towards the **NW**.

* <http://www.westoxon.gov.uk/media/1523352/Air-Quality-Progress-Report-2016.pdf>

10. CLIMATE CHANGE MITIGATION & ADAPTATION

Vague uncertainties expressed by WODC and the bias against **LSA40** in stating it will have *“negative effects on greater gas emissions in the short to medium terms through construction activities and increased traffic...”* are not comments made against **NW**. Yet on access alone **NW** construction traffic will have a problematic and adverse effect on a rural location with narrow access roads, a dangerous bend at Foxburrow Lane, and proximity to Witney County Primary School to the north and The Kings School to the south, both sharing already published access routes for construction. NWAG submits that, again, the comparative weighting is highly subjective in order to justify **NW**.

12. FLOODING

It is simply unacceptable that the two sites can be evaluated on an equal footing when the **NW** site, as existing agricultural land, continues to contribute to the historic flooding of Hailey Road, Eastfield Road, West End and Witney town centre. Flood mitigation proposals from 'desk top' (ENV4, p3/59, #4) infrastructure modelling and without detailed costs and checks only attempt to address the impact of 1400 houses and not the existing threat and historic flooding that the site creates from water cascading from three water courses emanating from above 100m contours. All efforts to mask these huge threats are dammed by WODC's narrative *“taking these uncertainties into account it is therefore considered that the residual effect will still be neutral, with an element of uncertainty until further detailed modelling has been carried out.”*

NB. “The biggest issue in the constituency remains the aftermath of the flooding....and the anxieties about future flooding.”

David Cameron MP for Witney, Annual Constituency Report July 2009.

13. BIODIVERSITY & GEODIVERSITY

The same score rating is not correct. **NW** is within the Wychwood & Evenlode Conservation Target Area and the entire land is within the work of the Wychwood Project. The supporting text acknowledges several identified protected species in **NW**, with none listed in **LSA40**.

LSA40 is bounded and contained on all sides by an existing road system while **NW** is a natural extension of the village of Hailey. The need to build the West End Link road (**WEL**) alone creates irreversible ecological damage to the Upper Windrush Valley. The weighting neither reflects WODC's supporting text nor addresses the facts.

14. LANDSCAPE CHARACTER & THE HISTORIC ENVIRONMENT

The draft Local Plan acknowledges **NW** cannot be built before the West End Link (**WEL**). Therefore, in assessing landscape character and the environment, **WEL** has to be added to the weighting in its own right. When added to the **NW** weighting, the scoring produces a double double Major Negative.

Even when considered on its own, scoring **NW** as double Major Negative does not excuse WODC in only improving the second of the two weightings of **LSA40** to only Minor Negative in light of the substantive positive comments in the site's LVA 2017 submission. WODC's acceptance that "*the (LSA40) site option will not have major significant negative effects on any designated heritage assets*" further supports the need to accept a wider differential between **NW** and **LSA40**.

15. EMPLOYMENT

LSA40 is only one adjacently located A40 junction from the Witney sub area major designated area of employment at Downs Rd. Yet the supporting text only refers to the potential of the Station Lane industrial area. **NW** is the furthest point from the main designated areas of employment and would require some travel through the Witney Conservation Area to achieve access. The supporting text which lists a catalogue of employment hurdles for **NW** inexplicably concludes with the same weighting category as **LSA40**.

Conclusions

Sustainability Appraisal (SA)

The evidence presented by NWAG in nine of the 16 revised Category Objectives substantially degrades the category scores of the proposed North Witney SDA.

Oxfordshire County Council's Traffic Observations

OCC's evidence referred to in the 2017 WYG Witney Transport Strategy Refresh A101212 (**TRA7**) significantly undermines the delivery of the North Witney SDA on traffic grounds.

Deliverability of the West End Link Road (WEL)

OCC's comments referred to in **TRA7** questions the ability of WEL to pass the Sequential Test and, therefore, with clear alternative sites both in the Witney sub-area and in West Oxfordshire generally, WEL must also fail the Exception Test.

Improvement in Air Quality

WODC's current 2016 Air Quality Annual Status Report (not updated from their 2013 report in their revised SA submission in support of North Witney), declares NO2 levels are dropping consistently and substantially in Bridge Street.

Deliverability by 2031

Given the verbal commitment by WODC's QC during Stage 3 of the Examination that relevant infrastructure will be in place before site development, the body of evidence is compelling that the complexity, costs and uncertainties of North Witney place it beyond the time frame of the plan.

Submission of North Witney Action Group (NWAG) to December 2017 Consultation.