

NORTH WITNEY ACTION GROUP (NWAG) COMMENTS ON WODC 2043 LOCAL PLAN CONSULTATION

“Representation must be legally compliant or not sound.” Liz Leffman

“Infrastructure has to prove it’s sound and legal.” Andy Graham

WODC Council Meeting July 22, 2026

NWAG contends the 2043 draft Local Plan as it stands **is compromised by OCC Highways submission removing WEL2** that contravenes the current Local Plan Policies T2 and WIT2.

Ref: LP 2031 T2 7.40: LP2031 WIT 2 c) 9.2.37

If the West End Link is no longer considered essential infrastructure yet *“adopted in the Local Plan as a fundamental prerequisite for the **comprehensive development** of the site”*, the **NWSDA is uncoupled from strategic infrastructure and no longer ‘comprehensive development’** and therefore cannot remain categorised as strategic. *(WODC LP2043 Preferred Spatial Option Consultation 7.61)*

No Active Travel proposal can qualify this site. **The historic narrow road system, conservation areas and listed buildings** around Wood Green, New Yatt Road, Broad Hill, Narrow Hill, Staple Hall, Newland, West End and Bridge Street are **physical barriers to what the developer contends must be ‘high quality connection to Witney Town Centre’**. Policy EH10 ‘Setting Protection’ ensures adjacent or **nearby development does not indirectly degrade its historic context**.

(WODC LP 2043 Preferred Spatial Options Consultation 7.62).

(Ridge Transport Assessment Part 1, 6.9.1)

No dressing up of an **existing cycle path with two acknowledged fixed physical pinch points can compensate for strategic bridge infrastructure**. Highways statement (p13 para 2) *“In order to ensure the site is sustainable there is an essential need for non-vehicle movements and particularly cyclists to be able to get across the river at a point other than Bridge Street which as previously set out **is constrained by the historic street environment and unable to deliver cycle infrastructure....**”*

MODELLING FOR SUSTAINABLE TRAFFIC IMPACT

The comparative base model used to justify North Witney is flawed. The desk top modelling chosen is an inner-city area of Bergen, a Port city of 300,000 and the second city of Norway. The district is home of the City's University with 20,000 students, a cruise port terminal and served by tunnels and a bridge taking traffic through and out of the city. The comparison to a remote area of an historic English market town is as far removed as possible.

Yet Highways reliance on this flawed Model is unequivocal, stating: *'...significant further work has been undertaken on the approach to assessing the transport elements of the proposals and the methodology of the transport modelling that has been undertaken, and OCC are now satisfied that this is suitable.'*

(Ref OCC submission 31/07/2026, p12/49)

HIGHWAYS NARRATIVE ON THE ALTERNATIVE TO WEST END LINK IS FLAWED

The Highways submission headed '*WEST END LINK*' (24/00482/OUT, OCC 31/07/2026) is **questionable, not measured and consistently understates traffic impact**. For such a critical document that could determine the future of Witney to frequently use unmeasured phrases such as:

> '**Deterioration** in network performance across the area'

> 'these impacts are not forecast to be **severe** or at **unacceptable** levels.'

> 'there is only a **modest increase** in traffic volumes on the sensitive town centre junctions'

> 'There are **traffic impacts** associated with the development however at the Staple Hall junction'

These vague statements of **deterioration, severe, unacceptable, traffic impacts** and **modest increase** hide the truth. These are the FACTS behind Highways attempting to justify their narrative.

Close inspection and analysis of *Ridge/Jubb Traffic* reveal the facts:

- The volume of traffic passing through the Staple Hall mini roundabouts using the Ridge diagrammatic traffic flows for Scenarios 01, and 06(b) reveal that any **perceived benefits of reduction of traffic** volumes through the junctions are **eliminated by the delays suffered** at the four access and exit roads.

(ES Appendix 7.1: Driver Delay Assessment Summary, Table 4.4)

- Between the diagrammatic traffic count of 2019 (Scenario 01) and Scenario 06(b) which **includes the NWSDA, Shores Green Junction and the NDR** there is an overall traffic increase of just 1.7% at the critical Staple Hall junction.
(Ref: *Traffic Assessment – Part 10*)
- **BUT delays at each of the four junctions off the mini roundabouts are created by the introduction of the proposed Active Travel measures.**
For example-
 - A4095 Broad Hill to Bridge Street:
AM Queue Length **392 metres** and a delay of five minutes and 45 seconds.
PM Queue Length **361 metres** and a delay of five minutes and 43 seconds.
 - B4022 Newland (Hill Close) to Bridge Street:
AM Queue Length **222 metres** and a delay of six minutes and 24 seconds.
PM Queue Length **156 metres** and a delay of four minutes and 37 seconds.
 - B4022 Newland to West End:
AM Queue Length **222metres** and a delay of six minutes and 18 seconds.
PM Queue Length **156metres** and a delay of four minutes and 37seconds.
- In their report, Ridge, as the developer's traffic consultant, **admit there are increased junction delays/queues**. Highways, therefore, must acknowledge the limitations imposed by Active Travel which disqualify the development.
(ES. V1 Appendix 7.1: *Driver Delay Assessment Summary*, P6 4.1.13)
- **The accuracy of the Modelling also needs challenging. There is missing data in traffic movement scenarios.** For example, in the developer's consultants Transport Assessment - Part 10, Sc 06(b), *again accepted by Highways*, we submit there are concerning omissions. **For example, there is no junction data indicated where Wood Green joins Woodstock Road.** Almost all vehicles entering Wood Green from Woodstock Road must then enter Farmers Close, and vice versa. The total number of cars in the AM & PM Peak periods exiting Farmers Close onto New Yatt Road towards Wood Green is $299+281=580$ **movements**, (excl. exits down Narrow Hill). However, they have **no destination identification** at Woodstock Rd. Where is the destination of those vehicles? Are they even included in the Woodstock Road vehicle count? **This needs an explanation.**

- Questions must be asked as to why important **Ratio of Flow to Capacity (RFC) comparisons between scenarios are not made available in the report**. These are shown in some tables but not in others. They are simply left out. By leaving out the RFC data from other comparative tables it becomes problematic to analyse, leaving the distinct impression that an objective conclusion is being obscured. Comparative tables must be in existence, and they should have been made available in the published report.
- **PELL FRISCHMANN V RIDGE DISCREPANCIES QUALIFYING ACTIVE TRAVEL**

There are significant and critical differences between the Applicant's consultants' findings (**Ridge**) to support their client's position, and Highways own consultant (**Pell Frischmann**). We would submit from the analysis of both, that Highways **has accepted at face value** the applicant's position over Pell Frischmann's cautious reservations. This is reflected in the following extracts which show the proposed Active Travel solution has negative effects throughout the road system impacted by the SDA.

PELL FRISCHMANN – North Witney SDA: Transport Modelling. Technical Note

(24/00482/OUT. Transport Assessment – Part 11)

Selected passages from '7. Summary and Conclusion.'

The Core scenarios are:

- **DM** (Do Minimum) Scenario **3** – 2031 Base + Local Plan Growth + SGSR
- **DS** (Do Something) Scenario **6b** – 2031 Base + Local Plan Growth + SGSR + NDR + New Yatt Rd Closure (NWSDA central demand – (b))
- **DS** (Do something) Scenario **9b** – 2031 Base + Local Plan Growth + SGSR + NDR + New Yatt Rd Closure + **WEL** (NWSDA central demand - (b))

7.1 SATURN model (larger area, less detailed modelling)

*The outputs from the models (demand flow difference plots, SLAs, and link flow tables) show that it is possible that **traffic generated by the NWSDA may route through Foxburrow Lane and Crawley to avoid delays** in Witney town centre.*

7.2 VISSIM model (smaller area, more detailed modelling)

*The network performance results show **that in both peaks for general traffic the DS scenarios operate much worse compared to the DM** with increases in travel times and delays and decreases in speed.*

*The junction performance results show that the **Bridge St junction (A4095/B4022)** performs very poorly in all hours in the DS scenarios in both peaks. The junction also creates **large increases in delay** at adjacent junctions **including the B4022/Crawley Road** to the north, the **A4095/High St/Mill St junction** to the west, the **A4095/Jubilee Way** to the east and south at **A4095/Jubilee Way/Cogges Hill Road** that all operate over capacity as a result of queuing back from the Bridge Street junction and move to a **LOS score of F***. In the PM peak the A4095/Jubilee Way junction performs much worse in all DS scenarios due to more traffic using it heading to/from the NDR.*

*** LOS – Level of Service. Graded A-F, F= worst.**

7.5 **Precis of Pell Frischmann Conclusion: North Witney SDA: Transport Modelling.**

The SATURN and VISSIM traffic models assess the impact of different development and traffic management scenarios on journey times and traffic flows in the town centre and surrounding roads. The models reveal varying effects on vehicle delays and route choices, particularly around the Bridge Street area and the West End Link (WEL).

- **Minimal overall network impact:** The SATURN model shows only minor changes in journey times for general traffic between the DM and DS Scenario 6b, with some increases in bus journey times during peak periods and **potential rerouting through Foxburrow Lane and Crawley to avoid town centre delays**. Scenario 9 with one-way circulation on Bridge Street reduces flows on Bridge Street but increases traffic on approaches like Hailey Road and Burford Road, causing some links to be over capacity.

- **Operational challenges at Bridge Street junction:** The VISSIM model indicates that Scenario 6 performs worse than the DM scenario due to increased demand and signalized pedestrian crossings, which cause more delays than indicated by the SATURN model. The introduction of toucan crossings on all arms increases vehicle stops, and sensitivity tests show that zebra crossings and the original layout reduce delays compared to signalized control.

- **Trade-offs in traffic and active travel provision:** The DS Zebra and Original scenarios isolate the effects of reduced active travel facilities and increased development traffic, showing negative impacts on overall network performance but some improvement at Bridge Street junction. However, this improvement shifts congestion to the Jubilee Way/Cogges Hill Road junction and worsens conditions on the Northern Distributor Road (NDR) during peak hours.

Finally, the **tension between the two Consultants'** positions is made clear in the minutes of the meeting of 18/12/25 between Highways officers, (*but not their consultants*), and the Developers. In the opening salvo James Duffy of Ridge says **"Ridge still has concerns with the Pell Frischmann model, which they consider overestimates impact in the vicinity of the North Witney proposals. Notwithstanding this, JD stated that to move things forward, it would be useful to know OCC's own view on the impacts as modelled by Pell Frischmann and whether they consider this could be acceptable subject to mitigation...."**

No significant mitigation discussion is minuted between the Developer and Highways in the final two meetings, apart from future '*monitoring of areas*' in Crawley village and within Madley Park. Indeed, it is at the meeting 03/02/26 that **Highways agreed to confirm Ridge's assessment of Active Travel measures**, leaving the impression there are **significant differences** between their **own Consultants and that of the Developer**. To emphasise our concerns, we note from the Minutes (unusually attached as part of the planning resubmission), that **Ridge with the developer** attended **all 14 meetings** while Pell Frischmann were invited to only four.

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Further evidence that **without WEL the North Witney SDA is not viable** and legally questionable is **underscored with the recently updated NPPF** and especially Section 15, Promoting Sustainable Transport.

TR1: **Vision-led approach to planning for transport** Para a) requires that "*the potential impacts of development on transport networks are understood and addressed.*" Clearly the analysis NWAG has uncovered and listed in this submission, demonstrates this is not the case. **The impact of the development is not 'understood and addressed'.**

TR3:1, a) **Locating development in sustainable locations** offers an obvious clarification that a remote site such as North Witney with no employment; a yet to be decided distributor road ending in the residential Hailey Road with two schools and a history of flooding; and a physical barrier of narrow roads and large Conservation Area is not "*sustainable as a location that should limit the need to travel, particularly by private car.*"

TR4:1. b) **Street Design Access and parking** emphasises '**segregated cycle facilities**', and yet a **significant route into Witney town centre pushes cyclists on to the highway** at Woodstock Road (down Broad Hill) and through the congestion of the Staple Hall junctions.

TR4.1.c) requires **measures to ‘Minimise the scope for conflict between pedestrians, cyclists and vehicles’** which **critically is conflicted by the Staple Hall junctions.**

TR6.2: **Assessing Transport Impacts** expects the transport strategy for the development and the transport strategy for the area to have **‘identified fallback options if initial measures do not deliver the expected outcomes.’** Highways single option of how Active Travel can qualify such a huge and remote development while dismissing WEL goes entirely against this NPPF requirement.

CONCLUSIONS

1. In considering the objective and external analysis of Highways unconditional acceptance of the Developer’s subjective position, **WODC should require OCC Highways to withdraw their flawed submission supporting an Active Travel only solution for the NWSDA**
2. **If the 2043 Local Plan uncouples the West End Link critical infrastructure from the NWSDA, the development is no longer ‘comprehensive development’** and Plots 1, 2 & 3 within the site each stand alone on their own planning and viability merits.
3. **North Witney is the most unviable site ever to have been considered by WODC. North Witney is remote; hemmed in by historic narrow roads in a large Conservation Area; an existing flood risk to homes and business and at the furthest point from employment, major retail, leisure facilities and the town centre.**
4. **So why has North Witney remained on the table for over 20 years?**
5. **NORTH WITNEY WAS ONLY ALLOWED TO BE CONSIDERED AND REMAIN ON THE TABLE BECAUSE OF A WRITTEN PROMISE BY THE NORTH WITNEY CONSORTIUM TO “FUND IN FULL” A SECOND RIVER CROSSING OF THE RIVER WINDRUSH. A promise supported in December 2002** in 10,000 leaflets written by the North Witney Consortium and delivered to residents in Witney, Crawley, Hailey and North Leigh. Therefore, Highways cannot sustain their statement *‘there is no current funding route’*.

6. The **acceptance by WODC** that the developers would be **liable for funding WEL** was **legally in writing and told to a Planning Inspector** in January 2024. Then, Counsel for WODC at the Appeal by K2 Dominion for Parcel 3, land west of Hailey Road, (when referring to essential infrastructure required in WIT2) said *“When considering these points, it is important to note that the financial contribution for the WEL, **which is intended to be facilitated entirely by the NWSDA**, represents by far the biggest single financial contribution that has been requested...”* In January 2024, as in December 2002, WODC understood that the developer pays for the bridge. **The 2043 WODC Local Plan must include the essential infrastructure of WEL or remove the North Witney SDA**

North Witney Action Group September 2026