NORTH WITNEY HOUSING DEVELOPMENT

Challenges and Interventions

(Issue 3 – Feb 2025)

Witney Infrastructure Neighbourhood Group (WING) Feb 2025 Page intentionally left blank

Document issue details.

Witney Infrastructure Neighbourhood Group (WING)

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Issue 2

Issued as a response to planning application 24/00482/OUT and as a consultation document with local councils that support WING.

Issue 3

Issued following consultations with:

- local councils that support WING and
- key stakeholders

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Executive Summary

As Witney has expanded over the last 40 or 50 years, elements of the road infrastructure have been gradually added, funded by the developers of major housing schemes. The final parts of the perimeter road system around the town that remain to be constructed are the West End Link, the Northern Distributor Road, and the west-facing slip roads on and off the A40 at Shores Green. In the Local Plan 2031, Oxfordshire County Council (OCC) recognised that congestion and air pollution in the Bridge Street area of Witney will be made worse by the additional traffic that will be generated by housing developments in the Strategic Development Areas (SDAs) at North Witney and East Witney. To mitigate this problem, the Local Plan requires the completion of Witney's perimeter roads and specifies that this infrastructure improvement must be funded by developers.

This is the background to consideration of current proposals for the housing development in North Witney. Residents in the area are concerned that the developer will limit the scale of infrastructure elements of their proposed scheme and that consequently the community in Witney and the surrounding district will suffer. To address these concerns, Witney Infrastructure Neighbourhood Group (WING) has been established. WING has representatives from ten local councils that contain and surround North Witney SDA. We believe that we can collate local opinion to find the 'best fit' that meets the expectations of our community. WING is therefore able to make a strong case that, if North Witney housing goes ahead, the associated infrastructure improvements are well thought out and fully delivered.

A range of stakeholders and decision makers have responsibility for managing Witney's infrastructure. This includes OCC, West Oxfordshire District Council (WODC), West Oxfordshire Multi-Agency Flood Group (WOMAFG), Witney Town Council (WTC), and the Environment Agency (EA), together with any developers. No single body has overall control, so the challenge is to ensure that all infrastructure improvements contribute to a coordinated solution. Undoing or reworking the contribution of any stakeholder must be avoided.

To achieve this, WING has set out four main challenges:

- Construction of the West End Link (WEL)
- Construction of Northern Distributor Road (NDR)
- Flood Prevention Measures through the Windrush Valley
- Community infrastructure as part of the North Witney housing scheme

The Local Plan 2031 states that the WEL could have a 'dual' role not only as a transport link but also for flood risk mitigation (ref para 9.2.44). The Plan places responsibility on the developer to elaborate this concept within their proposals. WING has included this as one of our challenges. We believe there is an opportunity to reduce flood risk by constructing the WEL as an embankment/dam that can retain water in the flood plain above Witney. WING's position is that the North Witney developer must include responses to all four challenges in their proposals.

We have consulted ten local councils and obtained written confirmation of their support for the WING initiative. We have used this as a mandate to consult and liaise with the key stakeholders to generate Issue 3 of our report. WING will continue to make efforts to influence decisions that are reached in the best interests of the wider community around Witney.

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Executive Summary

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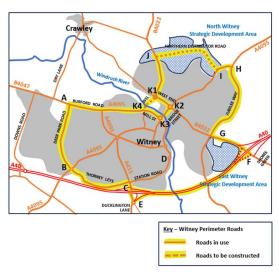
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Background

The construction of housing developments at North Witney and East Witney will complete an expansion of the town that was planned some 40 or 50 years ago. When growth and expansion in Oxford created the need for towns like Bicester, Witney, Eynsham and Carterton to make allowance for significant additional housing, the planners in Witney developed a long-term strategy that included perimeter roads around the town, funded by the major housing developments. As each housing project proceeded, another section of perimeter road was added. This approach eased the traffic flow around Witney and reduced movements through the centre of town. The only elements of the perimeter roads that remain to be constructed are the West End Link, the Northern Distributor Road, and the west-facing slip roads onto the A40 at Shores Green (now approved).



Windrush Infrastructure Neighbourhood Group (WING)



WING was established to coordinate the responses of local parishes around Witney to the proposals for housing development in the North Witney Strategic Development Area (NWSDA). WING has representatives from parishes (shaded green on the map) that are mostly, but not wholly, on the north of the Windrush and are seriously affected by limited access into Witney over the single river crossing in Bridge Street.

The Local Plan 2031 includes 1400 houses in the NWSDA. The area around Bridge Street already suffers from congestion and air pollution, and the Local Plan recognises that this would be made worse by the increase in population and traffic arising

from North Witney housing. It requires that infrastructure improvements must be built and that these are to be funded by the NWSDA developer.

If North Witney housing goes ahead, WING believes it is vital that the associated infrastructure improvements are well thought out and fully delivered. We will contribute to decision making to ensure this happens. It is important that the best use is made of available funding to improve local infrastructure.

In February 2024 an outline planning application was submitted by North Witney Land Consortium for a residential-led mixed-use development in the NWSDA (WODC Planning reference 24/00482/OUT). At the time of writing, this application is still under consideration.

In April 2024 WING submitted an initial, outline objection that listed our challenges to the application in broad terms. This initial objection was supplemented by the production of WING Report (Issue 2) that was submitted in May 2024 to provide an explanation of our objections in more detail. During the summer of 2024, we used Issue 2 of our report to consult with the parishes that support WING and have written agreement from all ten local councils to the approach that WING is taking. We believe that this gave WING a mandate to act as a hub for local opinion in the affected area of Witney and to continue our liaison with key stakeholders.

Proposals for North Witney Housing Development Challenges and Interventions

We then met with WODC Planners, the Environment Agency, OCC Highways and the West Oxfordshire Multi-Agency Flood Group to seek their response and comments on our report. As a result, we have been able to refine and strengthen the wording and to produce this document (WING Report Issue 3). The final drafts of each section were used to consult again with WING supporting parishes and the key stakeholders before publishing Issue 3.

WING's Challenges

Our challenges are to ensure:

- Construction of the West End Link (WEL)
- Construction of Northern Distributor Road as a perimeter road (NDR)
- Flood prevention measures through the Windrush Valley
- Full Community infrastructure as part of the North Witney housing scheme

The detailed case for each of the WING challenges is set out in Appendices 1-4.

Each challenge will be addressed by several stakeholders. They will have overlapping responsibilities affecting other challenges. We have therefore assembled a list of stakeholders and matched relevant stakeholders with each challenge to generate a list of the issues that we would like to discuss with each organisation. The outcome of this approach is shown in Appendix 5.

There is also an element of overlap in the responsibilities of the developer for SDA. The Local Plan anticipates a total of up to 1400 houses. There are two developers who own sections of the NWSDA:

- North Witney Land Consortium (hereinafter referred to as 'the consortium') owns the majority of NWSDA. The consortium is comprised of Blenheim Strategic Partners, Cranbrook Construction Ltd, Gleeson Land Ltd, L&Q Estates Ltd and Taylor Wimpey UK Ltd. Their outline planning application is for up to 1250 residential dwellings (this figure is inclusive of the residential dwellings proposed at Land West of Hailey Road).
- A2Dominion Developments Ltd owns the Land West of Hailey Road and applied for planning permission for 110 residential dwellings. Permission was denied and appealed. Their Appeal has been dismissed by the Planning Inspectorate.

The findings by the Planning Inspector in relation to A2Dominion's application have a bearing on the likely outcome for the whole of NWSDA. This is discussed more fully below in the section "Interventions to address WING's challenges".

For clarity, it should be noted that the Appendices and comments were written to address the consortium's Outline Planning Application and do not contain comments on A2Dominion's application.

Appendix 1 – Construction of the WEL

The provision of a second river crossing in Witney has been included in policy development for some years. Details of the potential location and layout of the WEL are illustrated in the appendix and have been included in West Oxfordshire Local Plan 2031 and OCC's Local Transport Connectivity policy documents. Decision makers will include a range of teams within WODC and OCC.

The developer has chosen to omit the WEL in their application for outline planning permission and the case for proceeding in this way is examined. WING's conclusion is that the impacts of building up to 1400 houses without a second river crossing will include increased congestion, increased air pollution, missed opportunities to prevent flooding, and missed opportunities to improve active travel.

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The OCC options report for the road layout in the Bridge Street area recommends:

- Clockwise flow around West End, Bridge Street, Mill Street and WEL with some additional lanes.
- Additional northbound bus lane in Bridge Street.
- Additional southbound lane over the WEL for all traffic.
- Cycle lanes and pedestrian footpaths on all sides of the area.

WING takes the position that the WEL must be a prerequisite of the development going ahead. This might take the form of a planning condition or a reason for refusal of the plans in their current form.

OCC has undertaken to act as Project Manager for the construction of the WEL together with road layout and junction alterations for central Witney. The Project Management Team at OCC has also accepted that they will need to consider flood prevention as part of the options for construction of the WEL. The issue of flood control is addressed more fully in Appendix 3 of this report. It is unclear what funding for the WEL will be expected from the developer if planning permission is granted to proceed with North Witney housing. WING will seek clarity on this.

Appendix 2 – Construction of the NDR

WING's outline expectations for the design of the NDR are set out in the context of OCC's published 'Street Design Guide'. The developer has used guidance intended for 20mph streets within developments as the basis for their proposals for the NDR. OCC's guidance is clear that streets with speeds of 30mph or more are to be designed as distributor or link roads and that the 'Street Design Guide' does not include for this.

The developer's proposals for the NDR as set out in the Transport Assessment section of their planning application are quoted for reference. WING considers that these proposals are inadequate and lists specific shortcomings as follows:

- The proposed road geometry does not match the standard of other perimeter roads around Witney and will fail to provide the free-flowing route that will be needed for residential and through traffic.
- Access to Witney along New Yatt Road would be restricted under the developer's proposals. WING disputes whether these proposals will satisfy local needs and requests OCC to carry out an independent assessment of possible options.
- Provision for HGV routing in the developer's proposals conflicts with the current approach that is being developed by OCC for Witney and the Windrush Valley area. In particular, the introduction of a point weight restriction in Bridge Street would conflict with OCC policy as decided after the rejection of a similar restriction on the A361 through Burford.

WING's conclusion is that the developer's proposals for the NDR should be rejected and that further options need to be developed.

Appendix 3 – Flood prevention measures through the Windrush Valley

WING believes that Witney's flooding problems should be addressed as part of the infrastructure improvements associated with NWSDA development. Although construction of the WEL will tackle the congestion and air pollution issues that are recognised in the Local Plan, the WEL could also provide a control mechanism for flow in the Windrush. This 'dual' role possibility is recognised in the Local Plan (para 9.2.44) but has been ignored by the developer. WING sees this as an omission that should be reconsidered.

The WEL could be constructed as an earth dam that would retain flood water in the flood plain on the upstream edge of Witney. The dam would have a restricted opening to reduce the flow of water into the town, providing a major element of flood control in a severe weather event. The river channel under the bridge in Bridge Street

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acts as a pinch point for the river flow and water currently collects above Bridge Street in the basin within West End, Bridge Street and Mill Street. This basin is filled not only by the flow in the Windrush but also by surface water from the 750mm diameter drain under Hailey Road. WING has identified a series of interventions that would manage the flow in the Hailey Road Drain. More detailed proposals for building the WEL as an earth dam and for controlling the Hailey Road drain are set out in the Appendix.

The Environment Agency (EA) is a statutory consultee in any application to construct a river crossing over a main river. The EA's response to such applications will always start from the position that a structure over a river must not adversely affect the flow and must not cause flooding. A proposal for an open viaduct structure with wide spans and minimal piers would meet this requirement, but such a structure across a river valley would be a heavily engineered and expensive solution. OCC have recently used £25m to £35m as a broad cost estimate for this structure. If the alternative approach was adopted using an earth dam, there would be a significant saving. EA's involvement will be essential before this alternative can be fully investigated and costed.

WING held an initial meeting with EA. We were encouraged to find that they are considering the construction of embankments across the Windrush that would retain flood water in the flood plain areas between Witney and Minster Lovell as the best way to provide full protection to Witney. Three possible sites have been found as detailed in the Appendix. Only two of these sites will be needed to retain a total of 2.0 M m³ of flood water and protect Witney in a 1-in-100 year flood. An embankment in the vicinity of the WEL would provide about a third of this overall retention capacity.

Procedures followed by EA for the construction of embankments to manage river flows include a cost benefit analysis. The cost benefit ratio is defined as total benefits divided by total costs. Government grant funding of up to 15% is available for schemes where the cost benefit ratio is above 1.0. No such funding is available below this threshold. The balance of 85% of the capital needs to be sourced elsewhere. Funding therefore represents a major hurdle to be overcome. From the developer's point of view, the Local Plan requirement for them to construct the WEL will be seen as a potential cost of up to £35m. The cost of the embankment solution would be more in the order of £15m. If the embankment is provided as part of NWSDA, it delivers and funds a significant part of the flood protection measures that EA is considering for Witney. The embankment solution for the WEL therefore has financial benefits for the EA and offers a potential saving for the developer.

WING urges EA, OCC and WODC to consider a scheme that would use the WEL as the first part of a new system of flood control through the Windrush Valley. There are few opportunities to secure capital funding for such schemes and, if this chance is allowed to pass by, there may not be another for many years. Without better flood control, Witney will continue to flood during severe weather events. WING will press for delivery of a flood management plan along the full length of the Windrush Valley through Witney.

Appendix 4 – Community Infrastructure as part of the North Witney housing scheme

'Community infrastructure' is defined as the elements, in addition to housing within a planned development, that will support the day-to-day life of its residents. These include for gatherings, sport, play and social activities as well as healthcare, shops, and schools. The wider term 'infrastructure' is generally taken to include major structural elements such as roads, bridges, and flood defences but these elements also contribute to 'community infrastructure'. There is a potential overlap that must not be missed.

The North Witney development will lie entirely within Hailey Parish. New residents will be welcomed into the Hailey community and allowance has been made in the Hailey Neighbourhood Plan for both existing and anticipated residents within the parish. Comparison is made between desired facilities that are listed in Hailey's plan with those proposed by the developer. Where discrepancies occur, the case for the provision of

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community infrastructure as required by the Hailey Neighbourhood Plan is explained and justified. Major shortfalls in the developer's proposals include:

- The need of a separate community centre and not an allowance for community use within the local centre that is proposed
- Sports centre
- Playing pitch provision
- Burial ground provision
- Adequate provision for anticipated growth in school facilities
- A stand-alone health centre with GP surgery and pharmacy
- Upgrade of Public Rights of Way connecting Hailey to the development
- Dark Night skies

Hailey PC believes that a full review of community infrastructure proposals will have to be negotiated with the WODC Planners and the developer to reach some agreement. WING supports this position but will maintain active opposition to any planning application that does not fully deliver the infrastructure that we believe is necessary.

Interventions to address WING's Challenges

The approach that WING intends to adopt is set out in Appendix 5. For each of the challenges that we have presented, WING has considered the series of actions needed and the organisations and decision makers involved. Where there are potential synergies, such as with the WEL for traffic, air pollution, and flood management, WING believes these should be fully investigated. An integrated solution could save time and money and provide the best overall scheme.

By listing the interventions in this way, we believe that we have set an agenda for liaison with stakeholders.

Liaison actions and timeline

WING will contact the key Stakeholders in Appendix 5 to discuss the resolution of our challenges. We will make this liaison positive and constructive to assist in finding the best solutions for the whole area around Witney. There are two key decisions that will affect the timing of any development.

- 1. Will flood management be a fundamental element of North Witney development?
- 2. Will planning permission for North Witney housing be withheld for any proposal that fails to commit to construction of the infrastructure improvements that are included in the Local Plan?

On Point 1, to decide if the WEL could be constructed as an embankment (that could retain flood water in the flood plain upstream of Witney), a series of steps will be needed.

- EA would have to provide an updated hydraulic model of the flow in the Windrush that could be used for analysis of options. EA current programme is to complete this model by 2026.
- The findings in the Level 2 Strategic Flood Risk Assessment that was carried out for WODC by Wallingford HydroSolutions Ltd in March 2015 would have to be expanded to include the options for an embankment solution and to confirm the contribution to Witney's flood protection that this would provide.
- EA would respond as a statutory consultee to any application to construct this embankment.
- A full environmental impact assessment would be needed.

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- Ground investigation would be required to confirm if the earthworks material to build an earth dam could be sourced from the flood plain.
- Detailed design and costing for the embankment option would be required.

Only when these steps have been completed could OCC decide on proceeding with the construction of the WEL as an embankment/dam. The timing of this decision will delay OCC's next decision on choice of option for the Bridge Street area of Witney. The OCC options study assumes the existence of the WEL, but final design and construction cannot commence until the form of construction of the WEL is fixed.

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On Point 2, withholding planning approval for an application that does not fully deliver the infrastructure improvements specified in the Local Plan would require decisions on whether:

- infrastructure improvements will be undertaken by OCC as major schemes with funding contributions from the NWSDA developers, or
- the developers are to be required to undertake the infrastructure improvements.

At this point, the findings of the Planning Inspectorate in relation to the Land West of Hailey Road become more relevant. The Inspector dismissed the developer's appeal in part because they had not made provision to contribute to the cost of the associated infrastructure and also because there was no 'masterplan' for the development. The Inspector was clear on the requirement for the developer, or developers, to provide such a document.

WING contends that this approach needs to be coordinated to include all stakeholders in relation to infrastructure projects. Agreements will need to be reached on;

- the project management to re-engineer the road layout for the Bridge Street Area of Witney (OCC?),
- the delivery of a flood management plan for the Windrush through Witney (West Oxfordshire Multi Agency Flood Group?),
- clarification of the preferred options for flood risk management schemes to retain floodwater upstream of Witney (EA?), and
- schedule of responsibilities for construction and funding of infrastructure improvements (WODC, NWSDA developers, OCC?).

OCC's preferred option for the Bridge Street area of Witney shows the WEL with a carriageway width of 14m. Footways and cycleways make up 7m of this width. If the developers agree to contribute to the cost of the WEL, they will most likely dispute the need for such a wide structure

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None of these stakeholders can deliver an overall solution in isolation but working together they are far more likely to be successful.

The resolution of these major decisions will take considerable time to complete and could delay the start of housing construction by several years.

Conclusions

The response from WING in this document focuses on the necessity to provide infrastructure improvements in Witney if planning permission is given to housing development in NWSDA. We have not taken a position in favour or in opposition to housing development. Opinions from parishioners and councillors in WING range from those who are opposed to any further housing to those who accept that North Witney housing is likely to go ahead but who want to ensure that measures are taken to manage congestion, air pollution and flooding in the town, and provide adequate community infrastructure.

Without a guarantee that the associated infrastructure improvements are delivered in full, WING will challenge any attempt to proceed with housing.

A pre-requisite for the full application to move forward is a consolidated approach between the North Witney Land Consortium and A2Dominium Developments that produces an agreed masterplan covering the whole of the proposed development.

Decisions that are taken now will affect Witney and the area around it for generations to come. WING believes that there is an opportunity to work together to reach the best solutions. Our intention is to contribute positively to finding and delivering the best possible outcome for the Witney community

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Appendix 1

Construction of the West End Link

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1.1 Is the West End Link Needed?

The North Witney development's 1400 or so new houses will generate a significant increase in road traffic. This is likely to increase congestion and worsen air quality in all directions around the development, particularly on the route to and from Witney, which is already slow-moving at peak times and is an Air Quality Management Area with pollution levels exceeding target limits.

The West Oxfordshire Local Plan 2031, policy WIT2 [1], contains a section on the creation of a road across the meadow and river from the junction of Hailey Road, West End and Crawley Road to the Jacobs Mill end of Woodford Way.

1.2 Overview and Background to the Question of the West End Link (WEL).

There is only one river crossing for motor vehicles in the parish of Witney; Bridge Street.

A second crossing has been talked about in policy papers for some years, with the land it would need kept relatively clear and already partially in the possession of Oxfordshire County Council.



The red box on this map (from OpenStreetMap.org) shows a straight line connecting Hailey Road to Mill Street that would be the approximate route of any WEL.

This proposed road has been mentioned in West Oxfordshire Local Plan 2031 documents [1], [2], Infrastructure Delivery Plans [3] and frequently alluded to in Oxfordshire County Council Highways

documents [4], in association with discussion papers and policies about the North Witney Strategic Development Area (NWSDA) and its long-anticipated 1400 new houses.

OCC Policies outline that the expected order of road building should be Downs Road A40 junction (completed), Shores Green 4-way A40 junction (approved) with the WEL and Northern Distributor Road (NDR) following when the NWSDA is built [5], [6].

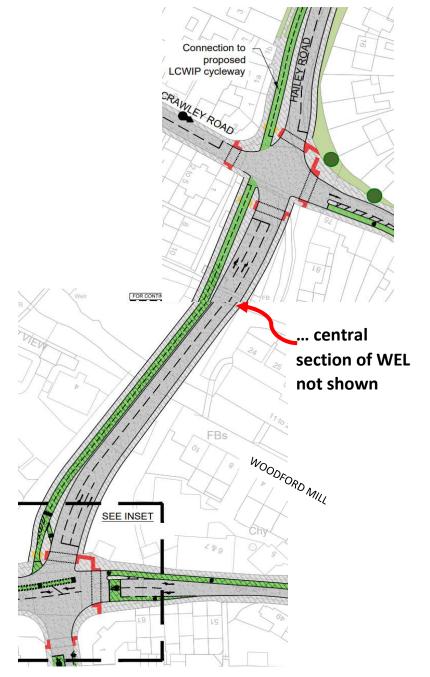


Image Source pp 2 and 4 Appendix D – Bridge Street Option 4.1 Concept Design [7]



Image Source:

https://commons.wikimedia.org/wiki/File:New_and_Old_at_Witney_Mill_-_geograph.org.uk_-_2908525.jpg This image, a few years old, shows the Jacobs Mill development and the land in the foreground kept clear for the WEL.



Image Source – Google Street View, Woodford Way/A4095 junction, showing the green gates which enclose land reserved for the WEL. Jacobs Mill is just to the right of the image.

Appendix 1 - 3

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1.3 Decision makers and Statutory Consultees

West Oxfordshire District Council (WODC) is the Planning Authority that will determine the outcome of the North Witney planning application.

Oxfordshire County Council (OCC) is a statutory consultee on Highways planning matters. OCC will also recommend planning conditions and draft and undertake legal contracts such as Section 106 (S106) or Section 278 (S278) agreements with the developers to fund and provide highways infrastructure.

The Environment Agency (EA) is also a Statutory Consultee for flood control on main rivers. WING has already consulted with EA on this report.

OCC also has an Active Travel department with expertise in infrastructure design standards to enable improvements to walking and cycling routes on existing streets and to ensure good provision in new developments. It is important that this department is involved with Highways planning responses at the key moments in the consideration process.

WODC will abide by the policies in its current Local Plan. OCC has a range of highways and transport policy documents and design standards. Hailey Parish has a Neighbourhood Plan [8]. Witney has a Local Cycling and Walking Infrastructure Plan [9], 2021's Access to Witney Report [6] and a forthcoming Witney Area Transport Plan.

1.4 Proceeding without the WEL

The 2021 Access to Witney report modelled the WEL as a bypass to Bridge Street, as well as the Shores Green slip roads, and concluded that traffic on Bridge Street would be better with than without it.

The developers applying to build the North Witney housing estate have omitted the WEL, citing Oxfordshire's Local Transport and Connectivity Plan 2022-2050 [4], which discourages the construction of new roads unless necessary.

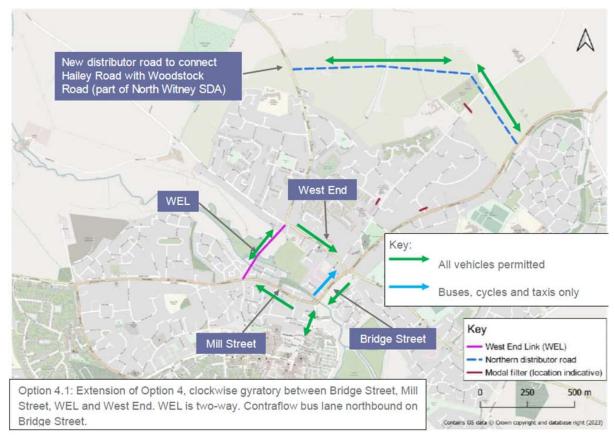
The impacts of building 1400 houses *without* a second river crossing are likely to include:

- Increased congestion on West End, Bridge Street, Woodstock Road and Newlands into and out of Witney, described as 'Carmageddon' in the Oxford Mail.
- Increased NO₂ levels and concomitant particulate pollution on Bridge Street, the Air Quality Management Area which has an Air Quality Action Plan [10], [11], that cites the WEL as part of the measures expected to bring Bridge Street air quality up and NO₂ levels down to compliance with national objectives.
- A missed opportunity to dovetail flood mitigation measures at the river.
- A missed opportunity to improve walking and cycling routes to connect residents to Witney.

The documents cited in this appendix suggest these impacts, and local residents are expressing these same concerns [12].

1.5 The Bridge Street Options Report 2023

A report published by OCC in late 2023 recommends the WEL [7].



Source: Bridge Street Areas Transport Options Appraisal, 2023 [7].

OCC, with a funding contribution from WODC, commissioned an options report for alleviating traffic on Bridge Street [7]. The models and options assumed Shores Green slip roads were in place and assumed some sort of NDR through or around the NWSDA an essential element of Witney development. The consultants took the Local Transport and Connectivity Plan 2022-2050 into account.

The report recommended a clockwise one-way, gyratory, system from Hailey Road via West End, Bridge Street and Mill Street and a 2-way West End Link connecting Hailey Road to Woodford Way. Features include:

- a bus lane on Bridge Street in the direction from Witney town centre towards Newlands, against the flow of traffic from West End.
- segregated cycle lanes against the one-way motor traffic lanes on West End and Mill Street (contraflow cyclists would use the bus lane on Bridge Street).
- segregated cycle lanes in both directions on the WEL.
- signalised junctions to replace mini roundabouts.

Other Oxfordshire market towns already have gyratory systems to manage traffic and congestion. This one would arguably incorporate more modern features for sustainable travel options alongside car routes.

1.6 Concluding Comments

At the time of writing, this Options Report is not the adopted policy of OCC's highways department. No position has yet been announced.

In an update to Witney Traffic Advisory Committee in September 2023, the County team wrote [13]:

"Bridge Street Area Options Appraisal Report (stage: Investigation/ feasibility). Officers have finalised the Bridge Street/West End Link Options Assessment report from consultants Pell Frischmann. This work includes the transport impact across the area of the Local Plan housing allocations at North Witney and East Witney and reviews the merit of the proposed West End Link Road given the adoption of the Oxfordshire Local Transport and Connectivity Plan policy document in 2022. Engagement and publication of the report is now being planned for after the Witney High Street and Market Square public realm engagement concludes in October [2023]¹. Initially this will involve Local Members before widening to other stakeholders including WODC, and the North Witney Strategic Development site among others. Following the engagement, the county will confirm its position through the forthcoming Witney Area Travel Plan, a subsidiary document to the Oxfordshire Local Transport and Connectivity Plan, which will be subject to public consultation in its own right."

An outline planning application for most of the development in NWSDA was submitted before OCC's position was decided. OCC's position will likely emerge during the consideration period for the application. Matters have also progressed in a second planning application for NWSDA that relates to proposals for 110 houses on land to the west of Hailey Road. An application for full planning permission was refused by WODC and on appeal to the Planning Inspectorate.

Consultation on options for central Witney has now started, and OCC gave a briefing to WODC, WTC and PC (Hailey and Crawley) Councillors on 18 January 2024. Content from this briefing has been used by WING in the preparation of this appendix. At the time of writing (Sept 2024):

- the wider consultation by OCC to the public is ongoing,
- WING has completed Version 2 of this report (dated May 2024) and submitted it to WODC Planning as an objection to the application for Outline Planning Consent, and
- The Planning Inspectorate has ruled on the application for the smaller section of NWSDA, and rejected the appeal. In his reasons for refusing planning permission the Inspector comments that he "expects comprehensive development to be led by an agreed masterplan for the NWSDA site." He states that "the expectation is now that the developer, or developers, of the site would produce a masterplan that will include for provision of supporting infrastructure and facilities including the essential delivery of the WEL and NDR."
- A decision on the outline planning application for the major proportion of NWSDA is pending.

WING takes the position, consistent with the WODC Local Plan 2031 and OCC's Local Transport Connectivity Plan 2022, that the WEL must be a prerequisite of the development going ahead. This might take the form of a planning condition or a reason for refusal of the plans in their current form.

¹ Text in square brackets is added for clarity.

References

- [1] "WODC Local Plan 2031, Witney Sub Area pages, p151 and Policy WIT2, p154 and WIT6 p165.," [Online]. Available: https://www.westoxon.gov.uk/media/pxvnq5j3/witney-sub-area.pdf.
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WING Appendix 1

Construction of the West End Link (WEL)

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Appendix 2

Construction of the Northern Distributor Road (NDR)

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2.1 WING expectations for Northern Distributor Road (NDR)

The NDR will form one of the missing sections of the perimeter roads around Witney. The perimeter roads that have already been constructed share many design features. They are main roads with wide verges, (many of these are lined with trees), they are free-flowing roads with few side roads and junctions, they provide good access to the residential developments that they adjoin, and they are wide enough to cater for bus and HGV use. There is no parking on the existing perimeter roads and no frontages to shops, schools or houses. They are not 'housing estate roads'.

OCC has published a 'Street Design Guide' for new developments. Section 2 of this document makes it clear that developers should use the guide for streets within housing developments but should not use it for distributor and link roads.

"Generally, streets with speed limits of 30mph or above are designated as local distributor and link roads and are not covered by this guide."

The NDR is a distributor road and must be designed to higher design standards. North Witney Land Consortium has failed to make this distinction and has used Street Design Guide standards in its proposals for the NDR.

WING expects that the NDR should be comparable in form to roads like Deer Park Road, Thorney Lees and Jubilee Way. We consider that the developer's proposals for the NDR fail entirely on this criterion and should be rejected.

2.2 Developer's Proposals for Northern Distributor Road (NDR)

The developer's proposals, in their submission for outline planning permission (WODC Planning ref 24/00482/OUT), contain indications for the NDR. These form part of the Transport Assessment for North Witney, prepared by Jubb for The North Witney Land Consortium dated December 2023.

Within this document, proposals for the NDR are shown in;

- Section 5 Development Proposals
- Appendix N: Proposed Traffic Model Scope Technical Note

Extract from Transport Assessment Section 5 – Development Proposals

5.4 Site Access

- 5.4.1 Access on Hailey Road and Woodstock Road would be achieved through the introduction of innovative Dutch roundabouts. These Dutch roundabouts serve to prioritise movements for cyclists around the junction through the provision of priority cycle lanes across each arm which vehicles are required to give way to. In addition, zebra crossings are also provided on each arm in advance of the entries to provide priority for pedestrians. The proposed new junctions therefore serve to facilitate walking and cycling movements first and foremost, in accordance with D&P principles. [Decide and Provide approach is set out within the TRICS Guidance Note on the Practical Implementation of the Decide & Provide Approach (dated February 2021). TRICS is the abbreviation for Trip Rate Information Computer System.]²
- 5.4.2 It is proposed that the Hailey Road access will take the form of a four-arm roundabout with the western access tying in with the Land West of Hailey Road proposals, eastern arm providing access to the development proposals and North and South arms providing connection for

² Text in square brackets has been added for clarity.

Hailey Road. In addition, the Woodstock Road access provides a link to the proposals from the western side with the northern and southern arms providing connection for Woodstock Road, and the eastern side providing connection to Harvest Way.

5.4.3 Furthermore, a vehicle connection, by way of a standard priority junction, will also be provided to the existing rural lane of New Yatt Road to the north. Moreover, to the south a pedestrian and cycling only connection will be provided to New Yatt Road allowing for active travel linkage with the North of Witney that provides onward connection to the town centre. It is understood that the stopping up of New Yatt Road (for vehicles) to the south of the site is proposed by the Local Highway Authority and therefore this access strategy would not preclude this.

5.5 Internal Road Network

- 5.5.1 In accordance with the Local Plan allocation the proposals will also include a linking transport corridor (i.e. the NDR) connecting from the western access on Hailey Road to the eastern side of the proposals where it will also link with the New Yatt Road and Woodstock Road access.
- 5.5.2 It is proposed that the NDR encompass a segregated cycleway and footpath on both sides of this link. This would encompass a 2m footway on both sides which would link in with the pedestrian connection on the various site accesses that would connect with the NDR. Furthermore, a 2m cycleway will also be provided on both [sides]³ which will provide sufficient width for eastbound cyclists (i.e. on the northern side) and westbound cyclists (i.e. on the southern side).
- 5.5.3 A 6.8m carriageway road width is provided across the NDR link. This width strikes a balance between ensuring efficient movement of buses whilst ensuring that road space is not increased to levels that would encourage car use.
- 5.5.4 It is proposed that the internal road network will include 20mph speed designation in consideration of existing speeds set within Witney. This speed designation will provide a suitable low speed environment that will serve to further facilitate safe active travel movements and is therefore in accordance with the D&P approach.
- 5.5.5 It is proposed that the street network of the site, including connecting roads linking with the NDR, also be designed in accordance with MfS [Manual for Streets]⁴ principles. In this regard streets will be designed in consideration of the aforementioned user hierarchy and will be designed in consideration of active travel users first and foremost with appropriate geometries that serve to slow vehicle speeds and provide space for these users.

Extract from Transport Assessment Appendix N

This appendix contained an earlier report by Jubb for L&Q Estates dated June 2022

4.0 Proposed Access

4.1 Whilst designs for the NDR have yet to be finalised it is proposed that this road would be developed to Manual for Streets standards and will include a 30mph speed limit to ensure that the link provides a street function. It is proposed that a roundabout access be provided either [end] of the NDR where it connects with the Hailey Road and at the A4095. The roundabout access onto Hailey Road would also facilitate access to the Land West of Hailey Road proposals (i.e. Zone 5604) via an additional arm connecting with the western side of this roundabout.

³ Text in square brackets has been added for clarity.

⁴ Text in square brackets has been added for clarity.

These proposals should be considered in relation to the coding assumptions of the NDR and site access roundabouts within the A40 Corridor Highway Model (CHM).

4.2 A connection will also be provided to New Yatt Road which will link with the NDR from the north. However, it is assumed that south of the NDR (i.e. towards Witney) access from within the site will be downgraded to a pedestrian and cyclist only connection. On this basis a New Yatt Road connection should not be included in the A40 CHM model between the site and the existing northern edge of the Witney urban area.

2.3 WING comments on Developer's Proposals

As noted in paragraph 2.1, WING's expectation for the NDR is that it should be part of Witney's perimeter road system with road geometry comparable to Deer Park Road, Thorney Leys and Jubilee Way. We believe that these roads have two functions; to provide free-flowing routes that will facilitate easy access in and out of the estate and to provide routes that are suitable for through-traffic including buses and HGVs.

The developer has failed to meet these requirements and has used the Transport User Hierarchy from OCC's Local Transport and Connectivity Plan (LTCP) dated July 2022 as justification to prioritise pedestrian and cycle use and to discourage use by cars and HGVs. WING contends that this is an incorrect application of the LTCP hierarchy, and that full provision must be made for the volume and all types of traffic that will need to use the NDR.

WING also challenges the proposal to introduce Dutch roundabouts. This would be entirely different to other local roads and would cause confusion. We believe that this proposal must be overturned.

The roundabout access at the A4095 would be opposite Harvest Way, the entrance into Madely Park (1,000 residences). This design would require traffic that wished to access the A4095 at the junction with Jubilee Way to negotiate two intersections. WING requests that OCC Highways Dept. conducts research to establish if this is the best solution for traffic to exit the development or should consideration be given to changing the route of the NDR such that it joins the A4095/Jubilee Way at one junction that is controlled by either traffic lights or roundabout.

The developer's proposals for the New Yatt Road indicate that vehicular access in a southerly direction towards Witney would stop at the NDR. If this proposal were to be allowed, WING has concern that drivers using the NDR would make use of the northern part of New Yatt Road as an alternative route to access the A4095. Roads through New Yatt and North Leigh would be used as a 'rat run' and would worsen existing traffic problems through these communities. OCC has undertaken to introduce restrictions and traffic calming measures on other local roads that will be affected by the changes that are introduced by the development of NWSDA. WING would ask that OCC's undertaking should be extended to include New Yatt Road. Provisions that might be included here are:

- Limiting road use to agricultural vehicles from the adjacent farms (Merryfield Farm, Home Farm, Heath Holm and other farms in New Yatt).
- Designating New Yatt Road as a 'Quiet Lane' with appropriate traffic orders and signage.

Any considerations on this would have to make provision for the proposed solar farm between Poffley End and New Yatt. Access to this site is proposed to be from New Yatt Road between Merryfield Farm and Heath Holm – mainly from the New Yatt direction.

2.4 Management of HGVs

The developer proposes to restrict larger vehicles from using Bridge Street with the introduction of a 7.5t weight restriction on the only road in Witney that crosses the Windrush river. Together with the proposal not to construct the WEL, these proposals would inflict long diversion routes for HGVs to negotiate. These proposals directly conflict with current OCC policy for HGV movements and should be rejected.

A precedent has already been established for the introduction of weight restrictions on A-roads through towns in Oxfordshire. The outcome of an experimental TRO on the A361 through the centre of Burford to stop HGV movement through their town was that the Order to overcome Burford's problem merely moved the problem to other communities, often on much less appropriate roads. OCC Cabinet therefore rejected the scheme and have set up working groups to develop alternative regional solutions. The Windrush Valley HGV Steering Group is currently considering solutions for the area that includes Witney. The options under consideration would not align with the North Witney developer's approach.

Similarly, OCC proposals for the Bridge Street area of Witney assume the continued use of Bridge Street for HGV movements. OCC's preferred option for the centre of Witney also assumes that the WEL will be constructed and would be used by HGVs. Again, the developer's proposals conflict with these OCC recommendations.

There is an apparent contradiction in the developer's proposals for HGV use of the NDR. In Transport Assessment para 5.5.3, the developer proposes a 6.8m width for the NDR that "strikes a balance between ensuring efficient movement of buses whilst ensuring that road space is not increased to levels that would encourage car use". If cars are being discouraged, how difficult will it be for HGVs to use the NDR? And yet in para 5.8.1, the developer suggests that their proposal to introduce a weight limit on Bridge Street "would be facilitated by the introduction of the NDR". The developer also shows the NDR as part of their diversion route for HGVs that are blocked by his proposed weight limit.

WING's opinion remains that the NDR will be part of the perimeter road system around Witney and that it must be wide enough to cater for HGV use, in accordance with national guidance for new roads as set out in the Manual for Streets.

2.5 Conclusions

Regarding the NDR, WING would request that OCC conducts its own traffic and junction design option studies of all the main links on the NDR. The results of these studies would then be used as consultation documents to assess which option would be preferred by Witney residents and those residents in the surrounding villages and hamlets such as Hailey, North Leigh, New Yatt, Ramsden, Poffley End and Delly End who will be adversely affected by construction traffic and additional traffic arising from the North Witney development.

Regarding HGV movement, WING objects strongly to the developer's proposals and considers these to be sufficient reason for rejection of outline planning permission.

Appendix 3

Flood prevention measures through the Windrush Valley

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Flood prevention measures through the Windrush Valley

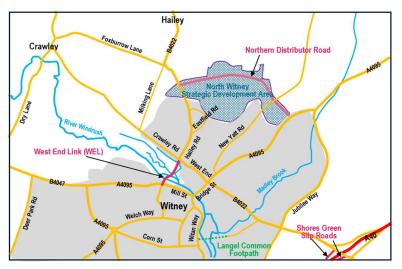
3.1 Overview of flood problems in Witney

Restrictions in the river channel at points through the town cause flooding during periods of severe weather. The key pinch point is the bridge in Bridge Street and the worst flooding occurs in the area immediately upstream of this bridge. The problem is worsened by another restriction downstream of Bridge Street where a public footpath crosses the river at Langel Common. Water is retained by the footpath embankment, flooding the section upstream, and hampering the flow through the bridge.

The Local Plan 2031 recognises the need to improve infrastructure in the town to deal with traffic congestion and air pollution in the Bridge Steet area of Witney It places a requirement on the developers of North Witney

Strategic Development Area (NWSDA) to fund construction of the West End Link (WEL) and the Northern Distributor Road (NDR). These infrastructure improvements will reduce congestion and air pollution (Ref Local Plan para 9.2.37).

The Local Plan also states that the WEL could have a 'dual' role not only in terms of transport but also in terms of flood risk mitigation (ref para 9.2.44). It notes that the developer would have to provide a detailed Flood Risk Assessment to support any proposal for the adoption of the dual role.



WING believes that using the WEL to reduce flood risk is very important. An embankment/dam instead of a multi-span viaduct would contribute significantly to flood management. The construction cost of the embankment solution would be significantly less than building the viaduct. WING believes this saving would be in the order of £20m although we recognise that detailed cost estimates are not yet available.

Witney will continue to flood from time to time unless changes are made to management of the river flow.

3.2 Flooding responsibility

The Environment Agency (EA) carries prime responsibility for flood control in major rivers like the Windrush. Their agreement would be the starting point in any scheme for new flood controls. However, there is also a responsibility for management of local flooding at County, District and Town levels. No single body has overall control. WING will therefore have to consult with a series of organisations and decision makers. Our approach to this is detailed in the main section of this report.

In September 2024, WING held an initial meeting with the EA to obtain their feedback on the proposals in Version 2 of our report. The EA provided some constructive criticism and the wording in the current version has been amended accordingly. We were encouraged to find that the EA is considering the construction of embankments across the Windrush to retain flood water in the flood plain areas between Witney and Minster Lovell as the best way to provide full protection to Witney. This matches the approach that WING is suggesting for the construction of the WEL. The EA were also able to quantify the volume of flood water that needs to be retained to protect Witney in a 1 in 100-year flood scenario. Their analysis suggests that 2.0 M m³ would need to be held in retention ponds. To achieve this, EA are considering three potential locations for embankments:

WING, Appendix 3

Flood prevention measures through the Windrush Valley

- Option 1 an embankment opposite Milking Lane to retain 0.6 M m³ between Witney and New Mill
- Option 2 an embankment above New Mill to retain 0.6 M m of water between New Mill and Crawley
- Option 3 an embankment above Dry Lane to retain 1.4 M m³ of water between Crawley and Minster Lovell.

The EA currently favours a combination of Options 2 and 3 to retain the total required to protect Witney. WING suggests that Options 1 and 3 would be a better choice for two reasons. Firstly, if the WEL is constructed as an embankment instead of the Option 2 proposal, it would be funded from the NWSDA. Secondly, WING is concerned that Option 2 would aggravate current flooding problems to properties in Crawley. Showell Brook flows through the centre of Crawley and discharges into the Windrush River between Crawley and New Mill. The Option 2 proposal would impede the Showell Brook outfall with water backing up into Crawley and causing worse flooding to several affected properties.

WING's proposal as set out in this Appendix would provide an embankment for flood control that is equivalent to the EA Option 1 proposal and also a highway crossing for the WEL.

Our conclusions from our meeting with EA were firstly that the concept of using the WEL embankment for flood protection is practical and could be agreed with EA and secondly that the retention capacity of the WEL embankment is only about a third of the total capacity needed to fully protect Witney from flooding. The WEL embankment could protect Witney for short term flood conditions, but it would not provide a total solution.

3.3 Reference documents

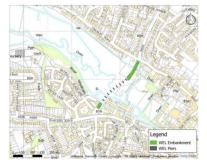
To produce this report, we have referred specifically to the following documents:

• Witney Level 2 Strategic Flood Risk Assessment (SFRA) produced for WODC by WHS Wallingford HydroSolutions Ltd, issued on 20 March 2015 <u>Witney SFRA 2015</u>

- WODC December 2020 Flood Report, issued January 2022 <u>WODC Witney Flood Report 2020</u>
- Crawley PC Report, issued October 2023 <u>Crawley Report on Witney Flood Control</u>

3.4 Construction of the WEL

The EA's first response to any application to construct a bridge over a river is normally to place a condition that the structure must not adversely affect the flow. For this reason, the first option that was considered in the Level 2 SFRA was for an open structure – a ten-span viaduct with abutments at each end and nine piers – that stretched right across the flood plain. The hydraulic model analysis for this option showed that predicted flood levels for the 1 in 100-year flood were not altered if this form of construction was chosen.





The Level 2 SFRA assessed two other options. The first provided single span bridges over the three river channels in this section of the valley. Between these bridges the WEL would be constructed on an embankment. The hydraulic modelling demonstrated that this option would also satisfy the condition of avoiding interference with the flow in the river. The 1 in 100-year flood levels stayed the same.

The final option was for a full embankment with restricted openings that would match the size of the opening under the bridge in Bridge Street. There was an intention to keep the flow balanced – matching what came in with what could go out. However, the size of the restricted openings did not consider two additional flows into the area between the WEL and Bridge Street. These were the Hailey Road Drain and a ditch behind properties in Crawley Road that links to Hailey Road Drain. Because of these omissions, more water could flow into the risk area than could escape and the analysis showed that the area between the WEL and Bridge Street still flooded.



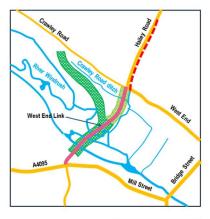
This last option demonstrated that water could be retained upstream of the WEL but identified a problem with the Crawley Road ditch. There is a low bank between this ditch and the flood plain. As the flood plain fills, water will quickly overtop this bank, flow into the ditch and on into the Hailey Road drain. This will add to the flood between the WEL and Bridge Street. In effect, the Crawley Road ditch acts as an outfall from the flood plain which limits the volume that can be retained upstream of the WEL.

The Level 2 SFRA conclusions recognised that further options were possible and stated that "there would be merit in investigating the viability of other more engineered flood alleviation solutions". WING would strongly support this approach and suggest that an option would be to:

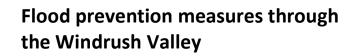
• Include the flow in the Hailey Road drain as part of the volume entering the flood risk area and restrict the openings for the Windrush river channels accordingly. The intended balance of total volume flowing in with the maximum volume that can pass out under the bridge in Bridge Street could then be achieved.

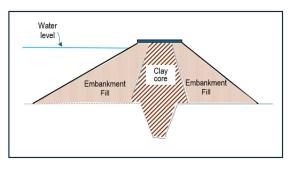
And;

• Overcome the problem with the Crawley Road ditch by changing the shape of the embankment/dam. All three options for the WEL that were considered in the Level 2 SFRA were for a 'linear' plan arrangement from high ground on the southern side of the river across to the junction of the WEL with the Hailey Road on the northern side. However, Hailey Road runs down a valley as it approaches the river so the proposed northern end of the WEL embankment in the Level 2 SFRA options was at a relatively low level. The northern end of the dam could be brought round to higher ground to the west of the Crawley Road ditch. This would separate the ditch from the river and allow more water to be retained in the flood plain. This "Y" plan arrangement is illustrated here.









In the diagram above, the earth dam is shown as a dark green shaded strip. Typically, an earth dam is comprised of a clay central core supported by embankment fill. The clay prevents seepage through the dam and extends down in a trench to prevent seepage under the dam. It is possible that the material for construction could be sourced from the flood plain although a full ground investigation will be needed to confirm this. If suitable earthworks materials are found, there are significant benefits:

• Using site-won material avoids the need to import large tonnages of earth and clay in road vehicles. There would be no impact on local traffic and no dirt on Witney's roads.

• The cost of an embankment solution would be significantly less than the alternative highly engineered 10-span viaduct solution. Currently the NWSDA developer, North Witney Land Consortium (hereafter referred to as "the consortium") is making an argument that the WEL is unnecessary and has deleted any inclusion of it in their outline planning application. WING strongly contests this position, and our argument is supported by comments from the Planning Inspectorate (Ref appeal for Land West of Hailey Road). However, the cost reduction that is presented by an embankment design would open the possibility of the consortium reconsidering their position. This is discussed more fully in the conclusions of our main report.

3.5 Flood management strategy and plan

The strategy that runs through our flood control recommendations is to consider interventions in sequence. For each issue we question:

• First, is this flooding caused by another problem downstream and, if so, will downstream measures be sufficient to clear the issue?

- Second, what local measures could be taken to rectify the issue?
- Third, if steps one and two are not sufficient, what more could be done upstream to reduce the volume or the rate of flow so that flooding does not occur?

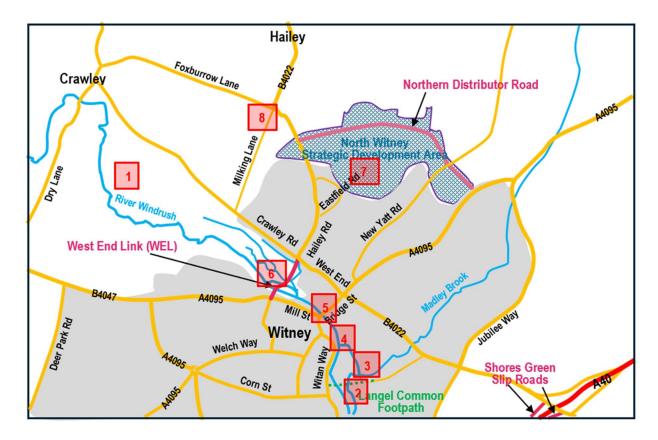
For every issue, our recommendations will begin at the downstream end and work progressively upstream.

Strategy for Flood Control centred on Bridge Street

To apply our flood management strategy for the Windrush Valley through Witney (where the key pinch point is the bridge in Bridge Street), our flood management plan considers:

- what interventions can be taken to clear blockages downstream of the bridge,
- what can be done at the bridge to maximise the flow capacity, and

• what interventions can be introduced upstream of the bridge to reduce the flow volume or to retain water that can subsequently be allowed to proceed at a reduced rate.



| Intervention Number | Description | Outcome/Comment | |
|---|--|---|--|
| | Intervention affecting all the Windrush valley. | | |
| | (This description is taken from the W | ODC December 2020 Flood Report) | |
| 1 | Update the 2014 model with updated level information, especially downstream of the Aquarius Bridge through to the footpath at Langel Common. Include main tributaries through Witney. | WING understands that the EA is currently working on a complete review of its hydraulic model. The output from this is expected to be available in 2026 and will provide a better model on which to base flood predictions. | |
| | Interventions downstr | eam of Bridge Street | |
| | (These descriptions are taken from the | WODC December 2020 Flood Report) | |
| Langel Common footpath to ensure flood plain connectivity is improved during all flood events. Ensure the footpath does not flood) and the number and size of the culverts t footpath embankment (to stop water fr up towards Bridge Street) would re | | A combination of raising the footpath level (to ensure the footpath does not flood) and increasing the number and size of the culverts through the footpath embankment (to stop water from backing up towards Bridge Street) would resolve this problem. | |
| 3 | Investigate if the perimeter ditch of the Aquarius site can be modified/ diverted to increase flow capacity. | | |

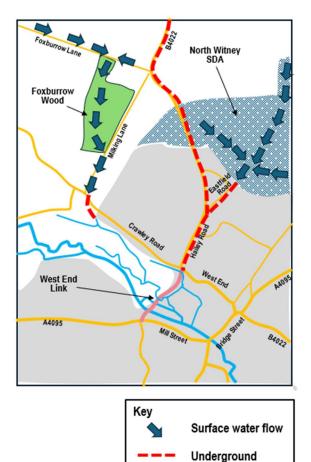
| Intervention Number | Description | Outcome/Comment |
|------------------------|---|---|
| 4 | Investigate if the river could be modified to increase flow capacity during severe conditions, especially between New Bridge Street through to the footpath in Langel Common. | |
| | Interventions at | Bridge Street |
| 5 | Dredge the river channel at Bridge Street bridge to maximise the flow capacity. | We understand that Witney Town Council has awarded a contract for this work to be done, however at the time of writing no works have commenced. |
| | Interventions upstrea | am of Bridge Street |
| 6 | Retain Windrush flood water in the flood plain by constructing the WEL on an earth dam. Water flow through the dam can be controlled by restricted openings in the dam. | This intervention is intended to reduce the risk of flooding in the central basin area within Bridge Street, Mill Street, West End Link and West End. The flows entering this basin area are: River Windrush millstream through Woodford Mills (Wier levels in the mill should be set to allow the maximum flow without overflowing the channel.) River Windrush channel at the low point in the flood plain (The river flow from the flood plain will be controlled by setting the width of the opening through the earth dam as defined by hydraulic modelling.) Hailey Road drain (Measures to limit this flow are set out in interventions 7 and 8.) These combined entry-flows must not exceed the capacity that can exit the basin through Bridge Street bridge. |
| 7 | Attenuation ponds in North Witney housing development. | Interventions 7 and 8 both deal with reducing the |
| 8 | Diversion of the surface water flow from Hailey village. Diverted route along Milking Lane and then in open streams and ponds through Foxburrow Wood to reach outfall into the Windrush in the flood plain upstream of the WEL. | outfall from the Hailey Road drain into the flood risk basin above Bridge Street. Intervention measures are set out in the table below following the same strategy that we are using throughout this report. |

Flood prevention measures through the Windrush Valley

Strategy for Flood Control centred on Hailey Road Drain

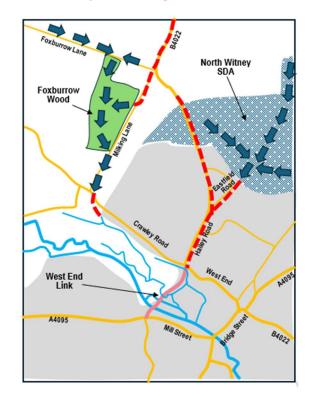
The 750mm diameter drain from the junction of Eastfield Road with Hailey Road down to the outfall into the basin area above Bridge Street is the focus for this table. Currently this length of piped drain becomes overloaded in periods of severe rainfall and overflows from the manholes onto the road surface. The outfall from the drain into the basin is also restricted because the basin is in flood. Consequently, more water backs up in the drain. The roundabout at the bottom of Hailey Road becomes flooded and impassable.

Current arrangement



piped flow

Proposed arrangement



| Intervention Number | Description | Outcome/Comment |
|------------------------|--|---|
| | Interventions downstrea | m of Hailey Road Drain |
| HR1 | Clear the obstructions and flooding issues downstream of Hailey Road to ensure there is a clear outfall into the basin. | of the Bridge Street interventions 1-6 as listed in the |

| Intervention Number | Description | Outcome/Comment | |
|---|---|---|--|
| | Interventions at Hailey Road Drain | | |
| HR2 | Consider measures to increase the capacity of the drain.A complete reconstruction of this drain would expensive and extremely disruptive.W proposal is that this action could not be justified | | |
| | Interventions upstream of Hailey Road Drain | | |
| HR3 (linked to Bridge St Intervention No.7) | Reduce the peak flow entering the Hailey Road drain from North Witney housing area by constructing attenuation ponds in the development area. | A series of small attenuation ponds is indicated in the developer's proposals for North Witney housing. Although these may be adequate to limit the flow rate from the housing development into the existing piped drainage system and prevent an increase in flow, these proposals will not overcome the current flooding problems in the Hailey Road drain. Providing fewer, larger ponds to increase capacity would reduce flood risks for Witney. The current drainage arrangement floods during severe weather events. An element of improvement is therefore essential. | |
| HR4 (linked to Bridge St Intervention No.8) | Reduce the total flow through the Hailey Road drain. | This target can be achieved by diverting the surface water drainage from Hailey village and redirecting it along Milking Lane and through Foxburrow Wood. The current piped drain that runs along the B4022 from Hailey Village to the Hailey Road Roundabout would be divided into two sections. The first section, from Hailey as far as Foxburrow Lane, would continue into Milking Lane, through Foxburrow Wood and then to an outfall in the Windrush flood plain upstream of the WEL. Within the Wood, new streams and ponds can be created to slow the flow rate, increase biodiversity, and improve the water quality using reed beds at the entrance to each pond. This is a project that the wood owners (Wychwood Forest Trust) are keen to deliver. The second section of the drain would start downstream of Foxburrow Lane and join the Hailey Road Drain at the end of Eastfield Road. Although this intervention at first appears to be minor, it will take out a considerable proportion of the flow that currently uses the Hailey Road drain and is an important part of the overall strategy. | |

3.6 Concluding comments

- WING believes that the approach outlined above could, if fully implemented, significantly reduce the flooding problems in Witney.
- An embankment design for the WEL would reduce flood risk significantly and could prevent any town centre flooding in short severe-weather periods.
- Additional embankments and measures will be needed to reduce the risks still further in line with the options that are being considered by EA.
- Achievement of full flood protection of Witney will require all key stakeholders to liaise and contribute to the production of a long-term strategy. This approach is discussed more fully in the main report section of this document.

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Appendix 4

Community Infrastructure

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4.1 Community Infrastructure - definition

Within this document, WING has chosen to use the term 'Community Infrastructure' to describe the elements, in addition to housing within the planned development, that support the day-to-day life of its residents. This covers a broad range of facilities such as a Community Centre, play areas, open spaces, parks and green spaces, cultural and sports facilities, allotments, healthcare facilities, shops and schools.

Community Infrastructure is not defined or identified as a discrete strategy, objective, or policy in any West Oxfordshire District Council (WODC) or Oxfordshire County Council (OCC) plans or reports. The Government's National Planning Policy Framework (NPPF) is equally deficient.

The wider term 'Infrastructure' is generally accepted to include major structural elements such as roads, bridges, and flood defences. In the context of our reports on North Witney SDA proposals, WING has commented on the specific infrastructure elements of West End Link (WEL), Northern Distributor Road (NDR) and Flood Defence in separate appendices. These major infrastructure elements provide the framework around which Witney's communities can be built, but they also are part of the Community Infrastructure of North Witney. The WEL and NDR will facilitate access for North Witney residents from their homes to local facilities, work and schools. They also form an essential element of the highways in the district that cater for visitors and through traffic. There is therefore an overlap between major infrastructure and community infrastructure needs. This issue is considered in more detail in section 4.4 below.

4.2 Combining North Witney and Hailey Parish's needs

North Witney will become part of Hailey, with access to Hailey Village Hall, play park, recreation ground and pump track, the rugby club, school and public house, and other Hailey businesses.

The development straddles Hailey and Witney, in walking distance of both, and new residents will lean heavily on Witney town centre as a service centre. They will also make use of expanded Hailey facilities and Madley Park Hall and shops as additional local centres.

The <u>Hailey-Neighbourhood-Plan</u> (1) contains policies for the needs of the pre-existing parts of Hailey and for this anticipated development. WING parishes support Hailey and its Neighbourhood Plan (HNP) and ask that the Plan is adhered to.

Comparison of the main aspects that are included in the HNP with the aspects that are proposed by the North Witney Land Consortium show significant differences.

| Hailey Neighbourhood Plan (HNP) | North Witney outline proposals | |
|--|---|--|
| Community centre Sports centre Playing pitch provision Play area provision for children and adults Allotments Health Care facilities Burial ground provision Upgrade of Public Rights of Way connecting Hailey to the development Dark night skies | A new 2 form entry (FE) Primary School (Use Class F1); A Local Centre with up to 400 m² of community facilities, co-working, mobility hub and retail facilities (Use Class E and F2); Maintained and enhanced access to the existing Public Rights of Way; Provision of community allotments and Local Areas of Play; New vehicular, pedestrian and cycle access to the Site from New Yatt Road and Hailey Road with connections to the existing Public Rights of Way Network; | |

| Hailey Neighbourhood Plan (HNP) | North Witney outline proposals | |
|---------------------------------|--|--|
| | Appropriate SuDS infrastructure basins and attenuation ponds; Enhanced green infrastructure, including open green space and landscaping to assimilate the development within the wider landscape and create a soft edge to the development. | |

WING would welcome the opportunity to liaise with WODC Planning and the developer to refine the community infrastructure elements of any revised application that the developer is considering. However, the content of the initial submission for outline planning permission does not satisfy Hailey Parish Council and WING remains an objector at this stage.

Without a community infrastructure policy, there is a risk that the developer will provide token levels of infrastructure that produce sterile, soulless, and characterless developments. As a consequence, residents of North Witney would have to travel into Witney to access any type of community facilities, contributing further to the existing traffic congestion in Witney.

The NPPF overall strategy is to support strong, vibrant, and healthy communities, by "... fostering welldesigned, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being" (2).

4.3 Adequacy of elements within the proposed development

4.3.1 The "Local Centre"

4.3.1.1 Developer's proposal (3)

The Local Centre that the developer proposes (para 3.14) would "include up to 400 m² of floorspace to contain a range of uses and services falling within Use Classes E and F2. A broad indication of potential uses for the Local Centre is as follows:

- Retail and Commercial facilities
- Community use, including potential space for healthcare uses
- Co-working hub
- Mobility hub
- Residential uses (located above the non-residential uses)."

It is considered reasonable to assume that 50% will come forward as Class E Retail Use" (4).

4.3.1.2 The "Community Centre" included in the HNP

The HNP (1) identified the following facility needs:

Community Centre

- main activity and assembly space
- entrance foyer
- equipment and furniture store
- kitchen
- toilets, including facilities for disabled people
- changing provision
- cleaner's store
- an office
- changing or dressing rooms and showers
- licensed bar
- permanent stage
- meeting or club rooms available for hire
- grass pitch changing rooms
- fitness training room
- community health facilities
- daytime centre for the elderly
- shops / post office
- parking facilities

HNP Policy CF1 States (pdf p39): "As there will be a new on-site primary school (2FE including nursery) on a 2.2ha site, it is recommended that school assembly / community centre/ sports halls, playing pitches, changing facilities and car parking facilities are shared wherever possible. The King's School should also be invited to share in this proposed integration of facilities."

However – this interpretation of shared amenities has been proven problematic in recent local developments of this scale, such as Windrush Place, and in historic developments that did not secure a community centre and only have a school, such as Cogges. Cogges must use the Blake School as a polling station as there is no other community building in the area.

A hireable indoor space for community activities is a necessity. It should have large and flexible hall space, the functionality to operate as a café and bar, a kitchen, and smaller break-out spaces.

It is essential to provide indoor places to visit for older members of the community, or people who feel isolated from those around them. Studies show that almost a fifth of the population often or always feel lonely.

Youth clubs, Scouting-style groups and other sports and activity clubs enable young people to make friends and learn new skills. They give the younger generation a healthy outlet for their energy and encourage constructive (rather than anti-social) behaviours, thereby nurturing positive character attributes and skills.

Exercise, sports and dance classes enhance adults' wellbeing and cement community cohesion. Spaces for interest clubs and societies are also needed in a healthy community.

Family and friends can really connect with one another when taking part in an activity together. It's also a great way to meet other families within the community.

The community centre should be community-owned by the parish council, to ensure fair access and upkeep funded by the precept.

It should have green energy supply (heat pump plus solar), excellent insulation and natural light, electric car charging, ample cycle racks and excellent connectivity via safely lit paths to the rest of the development.

4.3.1.3 Comparison of proposals for Local or Community Centres

The Outline Planning Application proposes to "co-locate" the "Local Centre" with the primary school. This aligns with HNP in terms of combining amenities where possible, but other developments (such as Windrush Place, Curbridge/Witney) have demonstrated problems when the school is the only venue available to a community – adult and senior citizen groups cannot hold daytime meetings and even activities outside of school time are at the mercy of school availability and the inflexibility of the space. WING stresses that the community centre must be stand-alone. An adequate facility needs to be larger than 400 m².

The main problem here is that very few of the infrastructure proposals in the planning application are quantified – this will presumably come with the full application. What quantification there is leaves cause for concern; 400 m² has been identified as the area for the 'Local Centre' but half of this area will be allocated to retail outlets leaving a totally inadequate 200m² for all other uses.

To put this into context, the plans for a replacement Village Hall in Hailey (including changing facilities and a badminton-sized hall) require a building of 785 m². Equivalent recently constructed Community Centres in Charlbury and Burford are substantially larger than the Hailey proposal. Both towns have populations significantly smaller than the NWSDA.

Currently the nearest Community Centres are a car journey away

- in Hailey,
- in the middle of Madley Park on the east side of Woodstock Road, or
- in the centre of Witney,

This discourages evening activities and makes it difficult for the less mobile.

4.3.2 School

WING welcomes the proposal for a 2-form entry school on the new development but also draws attention to HNP **Section 7** and **Policy ED1** (pdf p20), in favour of expansion of Hailey School's facilities. Evidence from the 2024 school places allocations at the new Windrush Place school shows that children living on that estate did not get places in that school. It is likely that Hailey Primary will need to expand and that OCC will require developer contributions to meet that need.

4.3.3 Healthcare

The HNP says in Policy CF6 (pdf p41):

"Development of North Witney community facilities should consider the inclusion of an NHS surgery/ Health Centre, preferably integrated into the Community Centre."

However, with Witney's wider expansion and the closure of Deer Park Medical Centre adding to NHS GP pressure, integration may no longer be appropriate in 2024. It is more likely that a separate, stand-alone healthcare facility will be needed following the example of the combined GP Surgery and Pharmacy that has been built as part of a recent development in Long Hanborough.

"Healthcare uses" tagged on to a busy community centre will not meet the area's existing needs together with those the new development brings; neither could the commercial proportion of the developer's proposed "local centre" accommodate an adequate healthcare facility. Witney's three GP surgeries already serve 40k residents made up from Witney's residents and many from surrounding villages. This development, coupled with existing demand, will support its own GP surgery. WING holds the position that a completely new surgery must be built.

4.3.4 Other Community Infrastructure needs

The HNP makes a case for a series of other community infrastructure elements that Hailey Parish would like to include in the North Witney development.

- Playing pitches
- Changing facilities
- Play area provision
- Allotment provision
- Burial ground provision
- Dark night skies

The application mentions but does not quantify some of these. WING would seek to discuss the provision of these elements as part of our liaison with WODC Planning and the developer.

4.4 Overlap between major infrastructure and community infrastructure needs

In the opening section of this appendix, the potential for overlap was outlined. To explain this more fully, it is easiest to consider two specific examples:

- The NDR is an essential element of the major infrastructure for highways that is to be provided as part of NWSDA. It is also part of the highway network within the development making it a community infrastructure element as well. The NDR will therefore have to cater for a high volume of traffic including a proportion of HGVs as well as providing the access routes in and out of the development for residents. To meet both requirements, the NDR cannot simply be an estate road inside a housing development. It must be part of the perimeter road system around Witney with comparable specification to existing perimeter roads such as Jubilee Way and Deer Park Road. It cannot have any on-street parking or properties that face onto the road. Access to all properties must be from the smaller roads within the development.
- The provision of attenuation ponds forming part of the flood control system is outlined in Appendix 3. As such they are major infrastructure elements, but they will be sited within the development and close to houses and play areas where they will be seen as community infrastructure elements. Many local residents attending presentations by the developer to explain the likely content of the development, raised concerns about the safety of these ponds. To address these concerns the ponds must be fenced off to restrict access by children.

An attenuation pond in a recently constructed housing development near the Long Hanborough station provides a good example.



This pond is planted as a reed bed and serves two functions – cleaning water that flows through it, and retaining a volume of water during flood conditions that will subsequently flow more slowly into the river.



These overlaps, and others that will arise, must be considered to find solutions that match major and community infrastructure needs. In this report, WING has chosen to deal with the major infrastructure elements in Appendices 1-3 and to use Appendix 4 to deal with elements that clearly form part of community infrastructure. But care will be needed to ensure that potential overlaps are not overlooked.

4.5 Conclusions

It is apparent from the outline planning application that the developer has placed significant reliance on existing facilities in Witney. However, as far back as 2016, in the Local Plan 2031 [7] WODC were warning that Witney services and facilities were under increasing pressure. Since then, Burford Road (260 houses), Downs Road (257 houses) and West Witney (1,000 houses) have been completed with token levels of infrastructure, thus exacerbating the situation.

WING's recommendations in this report aim to alleviate many of the problems associated with the planning application with the overall aim of providing facilities to enable a stand-alone, strong, vibrant, and healthy community to develop.

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Appendix 5

Stakeholder Liaison

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Stakeholder Communication Strategy

Table 1 – Challenges with interventions that identify Stakeholders.

| Challenge | Goal of Intervention | Potential Interventions | Reference | Stakeholders |
|--|--|--|-----------|---------------------|
| Construction of West End Link (WEL) | WEL to be a major part of the road layout options for Witney | Consider the shortlist of layout options produced by OCC Project Planning Team and confirm support for their preferred option | WEL01 | OCC WODC WTC |
| | Choose the best form of construction for the WEL | Review the case for and against a viaduct structure | WEL02 | OCC EA |
| | | Review the case for and against an earth dam | WEL03 | OCC EA WOMAFG |
| | Maximise the use of the WEL to add to community infrastructure | Provision of pedestrian routes and cycle tracks that will contribute to active living targets in the Local Plan | WEL04 | OCC WODC |
| | | Improvement in bus services using bus lanes to encourage greater use of public transport | WEL05 | OCC WODC |
| | | Benefits in reduction of traffic congestion and air pollution | WEL06 | OCC WODC |
| | WEL must form part of the Witney Perimeter Road system | Reinforce the need to complete the perimeter roads around Witney (WEL, NDR and Shores Green slip-roads are the only outstanding elements) | WEL08 | OCC WODC |
| | | | | |
| | | | | |

Challenges and Interventions

| Challenge | Goal of Intervention | Potential Interventions | Reference | Stakeholders |
|---|--|--|-----------|-------------------|
| Construction of Northern Distributor Road (NDR) | Construct the NDR to complete the planned perimeter roads around Witney | Form of construction and layout of NDR to align with other distributor roads (Thorney Leys, Deer Park Rd and Jubilee Way) | NDR01 | OCC WODC |
| | | Ensure access between neighbouring communities and Witney town centre is maintained | NDR02 | OCC WODC |
| | | Urge OCC to complete options studies for NDR alignment and road geometry Junction design at both ends of the NDR | NDR03 | OCC |
| Flood Prevention Measures through the Windrush Valley | A fully comprehensive hydraulic model on which to base flood predictions is required | Update 2014 Hydraulic flood model ensuring all main tributaries through Witney are included | FLD01 | EA OCC WODC |
| | Reduce flood risk Downstream Bridge Street | Look at improving flows through Langel Common footpath to ensure flood plain connectivity is improved during all flood events | FLD02 | EA WODC OCC |
| | | Investigate if the perimeter ditch of the Aquarius site can be modified/ diverted to increase flow capacity | FLD03 | EA OCC WODC |
| | | Investigate if the river could be modified to increase flow capacity during severe conditions, especially between New Bridge Street through to the footpath in Langel Common | FLD04 | EA OCC WODC |
| | | Dredge the river channel at Bridge Street bridge to maximise the flow capacity | FLD05 | WODC EA |

Challenges and Interventions

| Challenge | Goal of Intervention | Potential Interventions | Reference | Stakeholders |
|-----------------------------|--|---|-----------|--------------------------|
| | Reduce flood risk Upstream Bridge Street | Retain Windrush flood water in the flood plain by constructing the WEL on an earth dam | FLD06 | OCC WODC EA |
| | | Divert surface water flow from Hailey village via Milking Lane and then in open streams and ponds through Foxburrow Wood to reach outfall into the Windrush in the flood plain upstream of the WEL | FLD07 | EA WODC OCC WFT |
| | | Ensure the inclusion of attenuation ponds in North Witney housing development | FLD08 | WODC OCC EA |
| Community Infrastructure | Ensure that community infrastructure proposed in the North Witney housing development fully meets the needs of the | Ensure there are suitable community facilities where people can meet up and socialise | COM01 | WODC OCC |
| | community | Ensure there are adequate sports pitches and supporting changing facilities | COM02 | WODC OCC |
| | | Investigate the suitability for locating proper burial grounds | COM03 | WODC OCC |

Table 2- Stakeholders

| Stakeholder | Stakeholder |
|-------------|---|
| Acronym | Full title |
| EA | Environment Agency |
| 000 | Oxfordshire County Council |
| WFT | Wychwood Forest Trust |
| WODC | West Oxfordshire District Council |
| WOMAFG | West Oxfordshire Multi-Agency Flood Group |
| WTC | Witney Town Council |