

Responses to the consultation on the Hailey Neighbourhood Plan – December 2017

Wychwood project

With regard to the reference to Foxburrow Wood, west of Milking Lane, Witney and the designation of this as Local Green Space, could we please ask that the wording relating to this is modified slightly as follows: *The Wychwood Project have signalled they may wish to utilise part of the site to create a Wychwood Project Centre for learning and operational activities.*

Oxfordshire County Council

Hailey CE Primary School Playing Fields designation as Local Green Space

Oxfordshire County Council **OBJECTS to the designation** of Hailey CoE Primary School playing fields as Local Green Space and would like to understand the assessment process behind their designation. The county's objection was outlined in a letter to the Parish Council dated 28 June 2017 and is reiterated below for reference.

Policy E3 (Local Green Space) designates Hailey CE Primary School playing field (site LGS 14) as Local Green Space. In designating the whole of the current playing field as a Local Green Space, the Plan would risk hampering any future expansion of the school.

Paragraph 7.15 notes that expansion to 1 Form Entry would require the construction of four additional classrooms. At this stage, it cannot be confirmed where these classrooms, or any ancillary accommodation, would need to be built. **Policy E3 therefore contradicts Policy ED2 (Expansion of Hailey CE Primary School)**, which supports the aspiration of the Governors of the school to expand Hailey CE Primary school to a single form entry school, admitting 30 pupils per year group. It is important that the school retains the flexibility to make use of its site to best meet the needs of future populations.

Moreover, Policy E3 is unnecessary, as school playing fields already have protection. Disposal of school playing field land requires the consent of the Secretary of State for Education under Section 77 of the Schools Standards and Framework Act 1998; consent is also required for disposal of any land used by a school or academy under Schedule 1 to the Academies Act 2010. The Secretary of State's consent is also required for any change of use of playing field land, whether for another educational purpose or a non-educational purpose. The Secretary of State for Education uses the definition of "playing field land" set out in SSFA 1998 as "land in the open air which is provided for the purposes of physical education or recreation." Additionally, playing pitches are protected through criteria set out by Sport England and they would be consulted if there was any application related to a school playing field. Sport England would usually oppose on all but exceptional cases whether the land is in public, private or educational use.

We therefore advise that policy E3 Local Green Space is amended to remove Hailey CE Primary School playing fields from being designated as Local Green Space.

Inclusion in Infrastructure Delivery Plan (IDP) for expansion The Hailey IDP includes expansion of Hailey CE Primary School. Although consideration would be given to the expansion of the school as part of a solution for an overall school provision strategy, it would not be able to be expanded simply to secure its future. Section 106 agreements cannot be used to tackle problems that already exist and any money secured needs to be properly evidenced and justified as per Paragraph: 004 Reference ID: 23b-004-20150326 of the National Planning Policy Guidance.

The NP Infrastructure Delivery Plan (IDP) includes costs for infrastructure which has been estimated by Wiltshire County Council. The Neighbourhood Plan sits within Oxfordshire County Council administrative

area and it is not understood how these costs have been arrived at. Additionally costs for pedestrian crossings can vary between £60,000 and £150,000 depending upon the location and type of crossing. We would advise to make any changes based on costs provided by Oxfordshire County Council as Highway Authority for Oxfordshire.

Transport

Policy T1 Traffic calming at Delly End Crossroads: With 50 homes proposed west of the B4022 Charlbury Road and 9 homes at the southern end of Giernalls Road, traffic volumes are unlikely to reach the 500 vehicles (12 hour AADT) on every arm of the junction in accordance with guidance set out in the Design Manual for Roads and Bridges for roundabout junctions.

As such, **this policy should be revised to investigate the traffic calming options available.** A roundabout may not be the best option or a deliverable option to tackle vehicle speeds and the statement should be amended to say we will “investigate the possible traffic calming measures that are available.” The Hailey Infrastructure Delivery Plan (IDP) should also be amended accordingly.

Policy T2 School Crossing: Both the accident record and the pedestrian flows (the latter even with the proposed development) will be well below what is recommended in national guidance for the installation of a signalised crossing. Therefore, an uncontrolled courtesy crossing near the school may be appropriate. The IDP should be amended accordingly.

Policy T3 Traffic calming at Foxburrow - This policy should be revised, to investigate the traffic calming options available. A roundabout may not be the best option or a deliverable option to tackle vehicle speeds. The IDP should be amended accordingly.

Policy T4 Reservation of land for further extension of the Northern Distributor Road:

This requirement for a further road is not evidenced based on known growth nor sequentially tested against WEL2. Therefore this is not required for this plan period.

Policies T5 – T8 Public Rights of Way: Any funds for the improving of existing public rights of way will be requested from prospective developers in the locality by the Local Highway Authority under section 106 of the Town and Country Planning Act 1990. Any request for funds for this purpose will have to be necessary to make the development acceptable in planning terms, directly related to the development, and fair and reasonable in scale and kind to the development.

Policy ED3 – Traffic and Parking: Policy ED3 proposes to a ‘drop off circle’ at Hailey School. This would be resisted by the county council due to problems they inadvertently cause such as parent parking blocks them; Schools do not allow parents cars on the school site due to safety issues; and the school safeguarding policies mean that key stage 1 children are not allowed to leave the school site without appropriate supervision, meaning that parents driving to school will need to park and come in the school grounds to drop them off or collect their children.

Ecology

Reference to the Wychwood Project should be reworded as follows:

The Wychwood Project has signalled they may wish to utilise part of the site to create a Wychwood Project Centre for learning and operational activities.

Public Health

Although some of the strategic goals and objectives have significant public health implications and the plan recognises that the NPPF criteria for sustainable development includes “promoting healthy communities” (p. 5) none specifically mention ‘health or wellbeing’. To help make the case for interventions in the built environment that enable and influence the entire population to make healthier choices we strongly recommend that the goals and objectives overtly make the case for development maintaining or improving the health and wellbeing of people living, working and visiting Hailey. This is supported by NPPF paragraphs 7, 17 and 171. Section 10.11 is titled ‘Health, Health Care and Wellbeing’ but the subsequent text and accompanying Policy C7 are largely concerned with access to health care services. To avoid confusion with public health goals to prevent disease and ill health before they start, **we recommend that this section is retitled ‘Health Care’**. **We do however strongly support the principle set out in Policy C7 of integrating any health care facilities “into the Community Centre”** as identified in Policy C2. Key public health points to highlight throughout the plan would include encouraging the development of an environment which:

provides opportunities for people to be more active – whilst we strongly support the wide range of policies intended to facilitate physical activity including Policies C3 and C4 concerning playing pitches and play areas, Policy T2 concerning the provision of a Toucan crossing outside the primary school and Policies T5, T6, T7 and T8 which seek to upgrade/provide paths with all-weather surfaces suitable for pedestrians, cyclists and people with disabilities; we are concerned that Policy ED3 concerning traffic management at Hailey Primary School does not also mention the need to provide for and encourage active travel to school. Rather than providing a drop off circle that might encourage more parents to drive their children to school consideration could be given to identifying a suitable ‘park and stride’ site. Not only would this help to embed healthy travel behaviours from an early age but also tackle inactivity, obesity, school gate air pollution and congestion. This provision

could also be used to support the need for improved sport and recreation facilities, play areas and design considerations, such as permeable street layouts that avoid dead ends/cul-de-sacs.

provides opportunities to make healthier food choices - this could be used to support Hailey Gardening Club, aspirations for a small shop and Policies C2 and C5 for the retention/provision of allotments.

fosters good mental health and wellbeing by increasing opportunities for social interaction/reducing social isolation and loneliness – this could be used to support the desire for “multi-functional community building suitable for activities such as playgroups, older persons day-centres, clubs and societies” and similar facilities on the North Witney development site as set out in Policy C2. More generally, requiring that new, or improved, community facilities, public realm and green infrastructure should be multifunctional and accessible to all, is likely to increase opportunities for social interaction and support mental wellbeing/community spirit. Creating an environment that allows people to be more active will also protect and enhance mental health and wellbeing.

enables people to maintain their independence for longer - this could be used to reinforce aspirations for a range of housing types that meets the needs of both current and future residents and make the case for new builds that meet ‘lifetime homes’ standards. Moreover, this supports the aspirations of Policy H7 to enable the children of people living in Hailey to remain in the village potentially reducing the need for organised care of children/older people. This point also supports the need for locally accessible amenities and services, and public realm that considers the needs of older/disabled people, such as step free access, publically accessible WCs, regularly spaced benches and the replacement of footpath stiles with accessible gates.

The above are supported by NPPF paragraphs 7, 17, 35, 50, 69, 70, 156 and the PPG ‘Health and Wellbeing’ chapter.

To maximise the behavioural change potential of active travel infrastructure and the community value of high quality indoor and outdoor public spaces, we strongly recommend that the early phasing of such

infrastructure is highlighted within the plan. People moving into new developments are more likely to adopt healthier day-to-day lifestyle habits when health enabling infrastructure such as, walkways and cycle paths, community buildings, play areas and green space, is already in place. This is support by NPPF paragraph 177.

Hailey School's governing body

At our last governing body meeting, we discussed the plan, and we just wanted to reaffirm some details on policies that affect the school so we are all clear on the implications of certain initiatives, should they be implemented.

Firstly, we want to thank you for the very positive and supportive measures you have proposed in the education plan concerning Hailey Primary School. This is hugely appreciated, and very much in keeping with the mutually supportive relationship between the community and the school. If we are to maintain a flourishing village school in these increasingly challenging and uncertain times for education, these kinds of initiatives are going to be key and we are fully supportive of the actions proposed in the education section.

Policy ED3 Traffic and Parking traffic management in the event of the expansion of Hailey School states that any significant proposal for expansion of Hailey CE Primary School must include a traffic management strategy – such as a 'drop off circle' - to minimise the impact of additional traffic and parking at the beginning and end of the school day.

Whilst we would do everything possible to investigate and implement a traffic management solution, the local authority have made it clear that for expansion to one form entry they would not be prepared to pick up the costs of traffic management solutions and that we would need to finance these ourselves. We felt we needed to share this information during the consultation period so we are all on the same page as we would be looking to the Neighbourhood Plan to support these initiatives.

Policy T7 Upgrading of Footpath 4 & 6 Footpath 236/4 from the B4022 along Breach Lane to the corner of the school playing field

This policy states that the footpath should be upgraded to an all-weather footpath suitable for pedestrians, cyclists and people with disabilities (i.e. wheelchairs) and be associated with a back entrance to Witney C of E Primary School with a continuation of the all weather surface across the school grounds.

Firstly, we believe this actually means Hailey CE Primary School, not Witney C of E Primary School.

Secondly, whilst we absolutely support this and would want to encourage more parents & children to walk or cycle rather than use cars, there are significant safeguarding implications that the school would need to address to make this viable. Specifically, enabling access to the back of the school would require a managed

entry system such as an electric gate with a camera that ensures only legitimate visitors gain access as well as appropriate lighting. This is a very high priority for Ofsted and for us. This would have financial implications that the local authority would not pick up and we would be looking to the Neighbourhood Plan to help make these changes.

Policy E3 Green Space Designation

Following the letter we received from you proposing that the school playing fields should be designated as a green space, we discussed this as a governing body and communicated with Oxfordshire County Council who have responsibility for the land. We believe they wrote to you on the 28 th June saying they would object if it was included in the plan as they considered it to be unnecessary. The school playing fields

already have a high level of protection and any change in the land use would need to be approved by the secretary of state. We understand your reasons for this initiative, but if the playing fields were to be designated as a green space this would actually restrict building plans for the expansion of the school and also potentially impact the implementation of traffic management plans, so it would be better for the school and village not to have these designated.

Turley (representing the North Witney Land Consortium) note that the Neighbourhood Plan as currently drafted includes the full supporting text and policy wording taken from the Proposed Modifications version of the Local Plan dated November 2031. At this stage the Inspector has given no indication as to whether he considers the proposed modifications to be necessary, or indeed whether further modifications will be required to the Plan. To avoid inconsistencies between the policy text included in the Neighbourhood Plan for the North Witney allocation and what is in due course adopted as part of the Local Plan, **we consider the Neighbourhood Plan should simply refer readers back to the Local Plan Policy WIT2. It is inappropriate and unnecessary for the Neighbourhood Plan to repeat policy originating from District level.**

Public Footpaths

Parts of footpaths 286/11, 286/30 and 286/13 run through our client's land holdings at North Witney. **It is proposed to retain the existing Public Rights of Way within the site.** It is anticipated that these footpaths will be upgraded within the developable area of the site.

An area of landscaping is proposed at the northern extent of the site which forms part of the transition from the development to the agricultural land to the north. Given the nature of this area, **it may not be appropriate to upgrade these stretches of the footpaths to an all-weather footpath. Such an upgraded footpath is likely to have a greater landscape and visual impact than the existing low-key nature of the public rights of way.**

We further note that in light of the upgrades sought to the footpaths, it is recognised that outside the development area of the North Witney SDA, *“redirection of part of these footpaths along the edges of fields will have to occur.”* Applications will be required for consent to divert the existing Public Rights of Way and these cannot be secured through the Neighbourhood Plan process itself.

From the IDP which supports the Neighbourhood Plan consultation, it is clear that the upgrades are proposed to be delivered through S106 contributions and/or CIL when introduced. In preparing the emerging West Oxfordshire Local Plan, the Council have undertaken detailed viability analysis including the programme of works included in the Council's IDP. These additional works being sought by the Neighbourhood Plan IDP have therefore not been costed as part of the District Council's work. Clearly if CIL is introduced and the Neighbourhood Plan is made in due course, then the Neighbourhood Plan group will be entitled to a proportion of CIL receipts and these can be used to deliver the aspirations for the upgrading of the identified public rights of way subject to relevant consents being secured.

Policy T8 New footpath

The Policy seeks to require a traffic-free path being delivered alongside the new Northern Distributor Road from Hailey Road via New Yatt Road to Woodstock Road. It is unclear whether the Policy seeks a footpath running alongside the distributor road or whether a segregated footpath set back from the path is envisaged.

The current planning application for the Woodstock Road part of the wider SDA allocation

(14/06171/OUT) seeks outline approval with all matters reserved except access. As part of this process careful consideration has been given to the proposed nature of the distributor road **which would include footpaths on each side of the road.**

Whilst there remain some highways matters to be agreed through the application process, the **principle of the footpaths immediately adjoining the highway is not a matter of dispute.**

As such it is considered that this approach is acceptable to Oxfordshire County Council as highways authority and **would be an appropriate approach for the remainder of the Northern Distributor Road.** The proposed Policy wording to make clear that the path can run immediately alongside the Northern Distributor Road.

Policy C2 Community Facilities

The proposed Policy states that:

“All of the proposed housing developments, including North Witney, shall ensure that new residents have at least the same access to community facilities as existing residents and that new developments shall, as far as is reasonably practicable, preserve or enhance the facilities of the entire community.”

In respect of North Witney, the Policy advises that the development will be expected to contribute to:

- *“A community building appropriate to the scale of the development and ensure that it is in close proximity to new homes and readily accessing from existing homes.*
- *Land shall be made available to ensure that sports facilities, allotments, play areas and, where appropriate, a burial ground, can be provided.”*

The proposed policy wording is inherently subjective in its aspiration for new residents to have *“at least the same access to community facilities.”* **It is unclear whether this is to be quantified in terms of distance to facilities, number of facilities which it is able to access or indeed whether it seeks to prevent prioritisation of access to existing residents rather than new residents.**

Furthermore, whilst the supporting text to the policy identifies that Hailey is well served by existing community facilities, there is no associated assessment as to whether these facilities are at capacity, or whether indeed the increased patronage associated with new development will in fact help to safeguard their future- it is noted that the Saddlers Arms is identified as currently being closed.

Whilst the North Witney development is itself located within Hailey Parish, as the name suggests it is in fact more closely related to Witney itself and has a functional relationship with it. **No assessment or consideration has seemingly been given as part of the Neighbourhood Plan process as to the availability of community facilities in Witney and how these will also serve the North Witney development.**

Conversely the District Council has undertaken such an assessment through its evidence base to the Local Plan including the Settlement Sustainability Report (November 2016). Policy WIT2 of the Proposed Modifications Version Local Plan **does not stipulate a requirement for the provision of a community facility, although it is recognised that the District’s IDP (2016) does identify that a new community facility may be required as part of the North Witney development.** In seeking to respond to this, the North Witney Land Consortium as set out in the Development Framework Supplementary Document has identified that the new primary school which would be delivered on site could also be developed as a new community hub which could potentially serve the development with local facilities and services such as a community hall.

As currently drafted the proposed Neighbourhood Plan policy **provides no flexibility as to the form of provision which could be made on site.** It is noted that dual uses such as that suggested in the

Development Framework Supplementary Document do have cost savings associated with their management and maintenance which can help to ensure their future viability.

Given the Neighbourhood Plan is for Hailey Parish, it is assumed that the existing homes that the Policy text refers to are those in Hailey not in Witney which is more closely related to the allocation site. The Neighbourhood Plan itself identifies the good range of existing facilities available within Hailey and as such it is unclear why the community facility, which should be to meet the needs of the proposed development, not to address any existing shortfall (which in any event is not considered by the Plan to exist) needs to be readily accessible from the existing homes of Hailey Parish.

The Policy also requires the North Witney site to make land available *“to ensure that sports facilities, allotments, play areas and, where appropriate, a burial ground, can be provided.”*

We consider the requirement for each of these in relation to the separate policies in turn.

Policy C3 Playing Pitch Provision

The Policy seeks to require **the provision of at least 5.6 hectares of playing pitches** on the North Witney site. The quantum of pitches required is based on a standard of 1.6ha per 1000 population with the Neighbourhood Plan assuming the North Witney development population will exceed 3,500 residents. It is important to note that the draft Policy allocation for North Witney states that the site will deliver ‘about 1,400’ homes and as such **it is considered that it is inappropriate for the Neighbourhood Plan to state an exact figure of requirement.**

Furthermore the Policy is considered to result in **an unnecessary duplication of Policy EH3 of the Local Plan. As such it is considered that this policy should be removed from the Neighbourhood Plan.**

Policy C4 Play Area Provision

It is recognised that the North Witney development will need to deliver play areas on site and these would be interspersed across the development area. The proposals would be subject to public consultation through reserved matters applications following grant of outline planning permission for the development of the site.

Policy C5 Allotment Provision

The Policy seeks to require the delivery of 84 allotments either on site or within easily accessible distance. **The principle of the requirement for onsite provision is included within Policy WIT2 of the emerging Local Plan.** No specific quantum of provision is required by the Local Plan policy, which in part is a reflection that the Policy allows some flexibility as to the quantum of residential development to be delivered.

The supporting text to the Policy **correctly notes that most allotment strategies recommend a minimum provision equivalent to 15 allotments per 1,000 households.** It continues to advise that in the Neighbourhood Plan Area there is a short waiting list for allotments, where provision is currently 30 allotments for just under 500 Households (or four times the average recommended level of provision). For the Neighbourhood Plan group this is considered sufficient justification provision to seek to replicate the level of provision experienced elsewhere in the Parish.

As previously discussed, whilst the site falls within Hailey Parish, it is more closely related to Witney than Hailey. **It is therefore considered inappropriate to seek to replicate the level of provision experienced by the existing residents of Hailey Parish for the new development which will be of a different form and character forming an extension to an existing large town.**

In light of the need for the Council to increase its proposed housing requirement following receipt of the

Inspector's initial comments, the Council considered whether the capacity of the existing proposed allocations could be increased. This assessment process led to the proposed increase in the quantum of development on the North Witney site. **The Neighbourhood Plan's proposed requirement will result in additional non-developable area on the site which could potentially reduce the development capacity of the site** and result in the proposed development failing to achieve the level of development envisaged by the Local Plan. Plainly this would result in the Neighbourhood Plan failing the test of being in general conformity with the Local Plan given it would result in an under-delivery of development on the site and potentially result in the Council failing to deliver its housing requirement.

Policy C6 Burial Ground provision

The Policy seeks the provision of suitable Burial Ground capacity as part of the development of North Witney community facilities. Whilst it is recognised that the increase in population may lead to an increased demand for use of the Burial Ground in Hailey, it is important to recognise that this will only be sought by a proportion of any new population. Furthermore, whilst the site will fall within the Parish of Hailey **it is more closely related to Witney and as such residents may choose alternative facilities in this location.** No evidence is provided as to the level of capacity remaining at the burial ground, how long this is projected to last based on the current population or based on the increased population in the Parish. As such there is no justification behind this requirement and the policy should be deleted.

Should the District Council introduce CIL, the Parish Council or Neighbourhood Plan Group following the NP being made, would be entitled to a proportion of the receipts and these could be used towards securing additional burial ground provision if required.

As discussed in relation to allotment provision, in light of the need for the Council to increase its proposed housing requirement following receipt of the Inspector's initial comments, the Council considered whether the capacity of the existing proposed allocations could be increased. This assessment process led to the proposed increase in the quantum of development on the North Witney site.

The Neighbourhood Plan's proposed requirement will result in additional non-developable area on the site which could potentially reduce the development capacity of the site and result in the proposed development failing to achieve the level of development envisaged by the Local Plan. Plainly this would result in the Neighbourhood Plan failing the test of being in general conformity with the Local Plan given it would result in an under-delivery of development on the site and potentially result in the Council failing to deliver its housing requirement.

Policy C7 Health Care

The Policy seeks to require the North Witney community facilities to include *"the provision of an NHS surgery/Health Centre, preferably integrated into the Community Centre identified in Policy C2."*

No requirement for the provision of health care facilities on site is included in the Local Plan Policy WIT2. Importantly the Clinical Commissioning Group will have been consulted in the preparation of the Local Plan and **no requirement has been identified that has led the Council to require the provision of new health care facilities on the site.**

As noted in the supporting text to the Policy, most residents seek health care from one of the three GP surgeries in Witney. We note from the NHS website that all three surgeries state that they are currently accepting new patients. Given the North Witney development will be located in closer proximity to the existing medical facilities than the situation experienced by the existing residents of Hailey Parish, it is considered that this is an appropriate approach to remain. Should the existing facilities require upgrades or expansion as a result of the increased resident population then these can be secured via Section 106

contributions or CIL subject to meeting the relevant tests.

Policy E3 Local Green Space

The Policy seeks to designate a series of areas as Local Green Spaces. Those relevant to our clients landholdings area:

- *LGS15 The King's School playing field*
- *LGS16 North Witney landscape framework at new town edge*
- *LGS17 North Witney playing pitches and 'Village Green' areas*
- *LGS18 North Witney Allotments.*

It is important to note that the **location of all four of these areas has yet to be determined and as such it is considered inappropriate to seek to designate these as Local Green Spaces.** At this stage it is impossible to define these on a plan to support the Neighbourhood Plan and as such this is likely to lead to confusion in the future.

Paragraph 76 of the National Planning Policy Framework (NPPF) establishes the principle of the identification of Local Green Spaces through Neighbourhood Plans. Paragraph 77 of the NPPF provides further guidance on the designation of Local Green Spaces:

"The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- *where the green space is in reasonably close proximity to the community it serves;*
- *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- *where the green area concerned is local in character and is not an extensive tract of land."*

It is not considered that the above four areas can be considered to meet these requirements given they have yet to be delivered or created. As such it is considered that these four areas should be removed from the list of areas proposed for designation as Local Green Space.

Hailey Infrastructure Development Plan

A number of the points raised above regarding the proposed policy requirements are also relevant to the infrastructure requirements set out in the IDP and as such we do not repeat these comments here.

The IDP states that the *"developer now proposes a series of six flood attenuation ponds to be built outside the footprint of the North Witney site."* The Proposed Modifications to the Local Plan introduced flexibility regarding the drainage strategy for the site to include the *"consideration of 'off-site solutions."*

The North Witney Consortium and its consultant team are continuing to undertake further detailed drainage work regarding the potential drainage options for the site. The Development Framework Supplementary Document at Appendix One demonstrates one scenario where the drainage features would all be contained on site.

Gladman

Policy HI Number of New Homes

Gladman submit that this policy lacks clarity in supporting around 240 new homes, referencing figure 5.4 to demonstrate where these sites are. Reference is made to the allocations within the emerging Local Plan however it would appear that this development would not be supported by the HNP. Gladman therefore suggest that the wording

of this policy is modified to demonstrate support for the emerging site allocation within the

neighbourhood area and state that the sites identified have been allocated additionally to meet identified needs.

Policy H2 Scale of New Development

This policy seeks to limit the scale of development that would be supported additionally to the proposed North Witney development. Gladman question this approach highlighting paragraph 58 of the Framework which seeks for development to optimise the potential of a site. Seeking to limit the scale of development an allocated site that could possibly accommodate further development would therefore not accord with the Framework and **Gladman suggest that this policy is deleted.**

Policy H3 Site Allocation

Noting that the plan is positively seeking to allocate sites additionally to the strategic location in the emerging Local Plan, Gladman have seen no evidence to support the inclusion of these additional allocations. **To support these allocations a site assessment should be undertaken to demonstrate how the chosen sites are the most sustainable when considered against the alternatives and how it is not merely personal preference.** Further, as Neighbourhood plans which allocate sites may fall under the Strategic Environmental Assessment (SEA) directive **Gladman suggest a screening assessment is undertaken at the earliest opportunity.** If it is deemed that significant environmental affects may arise as a result of the allocations proposed within the HNP a full SEA will need to be undertaken to support the HNP.

Policy H4 Infill

Gladman suggest that as currently drafted this policy would not be in general conformity with the policies of the emerging Local Plan should this plan be adopted prior to the examination of the HNP. The emerging Local Plan does not seek to restrict the outward extension of the built-up area instead actively encouraging development adjacent to the built-up area which meets identified housing needs, Gladman therefore suggest this element of the policy is deleted.

North Witney

Whilst noting the impact the strategic allocation of North Witney may have on the neighbourhood area **Gladman question the necessity of a section summarising the policies regarding this development in the emerging Local Plan.**

As the document is still undergoing examination the final wording and scale of this strategic allocation may change and the HNP would need to be modified accordingly. Gladman suggest the repetition of these policies is therefore deleted with reference made to these policies instead whilst setting out how the HNP will support the Council in delivering this strategic allocation.

Transport Policies (T)

Gladman note there are a number of transport policies seeking various improvements for the road network. **These should not be worded as requirements, instead as aspirations of the plan setting out the Parish Councils intention to to work with the Highways Agency and the County Council to deliver these aspirations within the plan area.**

Community Policies (C)

Gladman note there are a number of Community Policies seeking to add additional requirements to the

strategic development at North Witney. **It is not considered appropriate to attempt to impose additional requirements to a strategic development proposal that could hinder the delivery of these scheme or even render the scheme unviable.** Necessary infrastructure improvements to ensure the allocation is delivered in a sustainable manner will be dealt with through the Local Plan.

Policy E3 Local Green Space

Whilst noting the intentions of this policy to designate Local Green Spaces (LGS) in line with the requirements of paragraph 77 of the Framework **Gladman suggest the evidence to support inclusion of these LGS designations could and should be taken further to ensure a more robust proportionate evidence base to support the policy.** Gladman suggest that further detail is provided to demonstrate how each of the LGS designations is demonstrably special to the community and how each is not an extensive tract of land.

Further, Gladman suggest that **LGS 16 is deleted from the plan as it is considered inappropriate to designate LGS on the strategic allocation in the emerging Local Plan potentially prejudicing the master planning of this allocation** and potentially undermining the ability of this allocation to deliver the housing requirement of the Local Plan.

Buffer Policies

Gladman suggest that each of the buffer policies is reconsidered. If the intention of such policies is to prevent settlement coalescence in the neighbourhood area **Gladman suggest that the Parish Council works with the Council to develop an appropriate policy response** and that such a policy may not be necessary if the Council believe that development in these areas could be dealt with adequately by policies in the Local Plan. Further, Gladman suggest that seeking to designate areas as a way to restrict development would be a strategic policy response beyond the remit of neighbourhood plans.

Residents

Hailey's 'dark sky' policy is not detailed in the plan

Listed buildings page 50 does not include Ivydene and Greenside, both in Delly End and both Grade II

Having read the Hailey Neighbourhood Plan I feel that I must complain most strongly about the possibility to 15 homes adjacent to the Rugby Football Club.

If this development is allowed to progress then that would be the bridgehead for more development of the field and an estate the size the field. The farmer has already tried to turn that field into a golf driving range. A proposal that was rejected.

I live in Hailey because I want to live in a village and live in the countryside not on an estate.

If this development is allowed to progress, how long will the buffer zone to the Witney North Development last?

This is a recipe for Hailey becoming a suburb of Witney and this proposal should be rejected as soon as possible.

Not all infill is good infill. This area it is a green field site and should stay as a green field site.

Section 3 Goals and Objectives

Would like to see specific reference within the mix of housing types – housing for people with disabilities

Section 4 – Hailey Today

Additional point – Poffley End Lane – having been a settlement of smallholdings some of which still remain as working smallholdings today.

Section 5 – Housing

Policy H4 Infill – where such developments: additional bullet point e) Does not seek to fill gaps which have been specifically left as part of the Hailey Conservation Area – for example fields marked as having a significant view on the WODC Conservation Area Character Appraisal Map.

Policy H6 Affordable housing – in cases where a 40% calculation ... or a financial contribution will be sought equivalent to a part unit. I do not know whether a financial contribution is standard practice but I would prefer the “rounding up” option provided it does not compromise the specification or quality of the affordable housing being developed.

Policy H8 Tenancy Mix – shared ownership. Not sure if this is feasible or acceptable to shared ownership purchasers – restricting ability of shared owners to “staircase” up to full ownership – i.e. by purchasing additional tranches up to 100% ownership should be considered. If, over time, all the shared ownership housing becomes 100% owner occupied it will prevent lower income prospective home owners from any prospect of home ownership within a village.

Section 8 – Transport

T1 Traffic calming at Delly End crossroads – not in favour of mini roundabout here – would generate queues in all directions. Prefer vehicle activated signs.

T3 Traffic calming at Foxburrow – support this at a potentially very dangerous junction.

Section 10 Community and Recreational facilities

Policy C3 Playing pitch provision – am concerned about increasing traffic if all 5.6 hectares of pitched were made available in the HNP area.

Policy C4 – Play area provision – policy should ensure funding is available to whichever authority is responsible for maintenance – presumably Hailey PC.

Some minor errors

P27 Footpaths – maps show footpaths as 286 but policy boxes show these as 236

P28 Policy T7 says Witney CE Primary school instead of Hailey

P34 Built environment – 11.8 should read Appendix G

P35 as above 11.15 should read Appendix H

Though I agree with the proposals made in the plan they are all focussed on Hailey village itself and the immediate environs and should also include the following:-

Traffic calming measures should be provided to slow vehicles down as they enter New Yatt from the west on New Yatt Lane (ie from Hatfield Pitts Lane).

Furthermore, New Yatt Road (from Kings School to New Yatt is currently unrestricted speed for vehicles and presents danger to any pedestrians, runners, cyclists and horse-riders who use it, due to speeding traffic, particularly on the bends. This will become worse when new houses are built on the southern edge of North Leigh and the northern edge of Witney at either end of this road.

A recreational path with no vehicular traffic should be provided between New Yatt and Witney to accommodate such recreational use.

There are proposed buffer zones at Foxburrow, Hailey and Delly End but none at the other side of the parish at New Yatt Road. I believe we should have a buffer zone either side of New Yatt Road just above

the King's School and the development of 200 houses

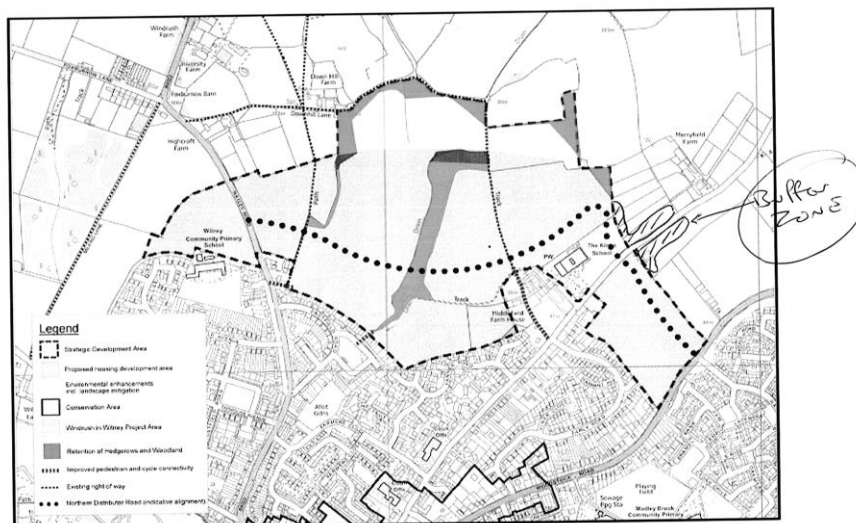


Figure 6.2 – North Witney Strategic Development Area (SDA)

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Developments of around 10 - 15 new homes tend to be urban in character which is evident from earlier developments of this scale in Hailey.

I would much prefer to see smaller clusters of new homes which, if woven into the fabric of the historic village, would support its services and facilities. I am assuming that these smaller developments would still provide the required percentage numbers of affordable homes even if it is necessary to change the formula for calculating this.

I do not support the proposed site for housing on land adjacent to the Witney Rugby Football Ground as this would be contrary to the provision of a rural buffer between the built edge of Witney and the Hailey Conservation Area.

I may well have been one who originally supported the idea of a mini-roundabout. However upon reflection I have changed my mind because it would most certainly be constructed as an urban roundabout with concrete kerbing, paving, lighting, signage, etc and the rural character would be lost. I am sure that the residents of Hailey would regret such an intrusion.

Since a mini-roundabout cannot be justified on current traffic figures I propose that it is dropped and we refer only to traffic calming measures such as vehicle activated signs as installed at the southern end of the village.

There appears to be an emphasis upon terraced and semi detached homes - suggest a more balanced approach with wider range of properties.

Sheltered housing for elderly in bungalows is a good idea but needs to be near services.

Infill policy and housing policy seem to have different levels of affordable housing H5 - 66% and infill 40% (rounded up)

H4 infill perhaps 1 small home for each larger one.

Need to have specific regard to the shape / structure of buildings, materials used etc. in conservation area as West Oxon planning appear to have a more flexible approach which does not always enhance or reflect the environment.

Mini roundabouts with lighting would lead to urbanisation of the rural environment. Would prefer flashing 30mph signs or narrowing of road into village. Mini roundabouts are usually used where side flows have a minimum of 500 vehicles per day - DFT recommendation.

Why do some footpaths have a no entry listing?

Footpath 7 and 3 should not be upgraded to bridleways as they would become unwalkable - they cross fields or on slopes. Many people use the footpaths and the population is set to rise. it is a popular and healthy activity.

O2 - New Yatt- would be better to resolve issue of the Saddlers Arms - asset of community value and maybe develop plot for multi uses rather than extend housing further onto farmland. Maybe develop as affordable housing and multi use room? Pop up shop?

We support the idea of buffer zones and the protection of the identity of Hailey, Poffley End and Delly End. Suggest increase width of buffer zone between Hailey and North Witney to greater than 50m and densely plant with trees and bushes.

We support the extension of Hailey Primary school as this should attract families, especially if it becomes a community hub with other services. However the rural nature of the school should be preserved as a unique feature of the school e.g. playing fields, hedges, access to wood, design of the older school buildings. The development of North Witney threatens the identity of Hailey and could lead to suburbanisation and urbanisation with generic housing which has little local or historic context.

Of great concern is the generation of more vehicular traffic as the Northern Distributer road appears to join with Hailey Road!. The assumption appears to be that most vehicles will be aiming to reach Witney, London or Oxford. In reality greater numbers of vehicles are already travelling north to Banbury and using the back roads to avoid congestion at Long Hanborough or central Witney. Subsequently Dry Lane Crawley, Foxburrow Lane / Crawley Hill, Priest Hill Lane and Whittings Lane are all taking more vehicles. As the working population of North Witney increases Hailey will experience increases in traffic for both employment and leisure.

We are pleased you have identified green areas to protect. Perhaps you can also designate areas of farmland? This may reaffirm that the land sold to "prospectors" at the end of Wood Lane becomes clearly designated as farmland in a plan....not building land. Over the years a few people have been sold plots in the hope they may at some point get permission to build! Twice this has been stopped and highlighted in the media.

New Yatt

Chamberlain No 2 Trust

I support the plan proposal for 15 dwellings of which 6 would be affordable. The trust is conscious of the need for housing which is both suitable and affordable for those who live locally and ideally are younger.

The trust reiterate their offer of an informal right of way alongside Taylors Copse to connect with footpaths 236/15 and 236/26

JPPC – alternative site

Section 5 – Housing, Policies H1, H2 and H3

The support for new housing within the Neighbourhood Plan Area via Policy H1 is welcomed and the inclusion of smaller sites, up to 15 dwellings, within existing settlements is supported.

It is noted that the Plan puts forward site HNP 02, land adjacent to 'The Hawthorns', New Yatt Lane, New Yatt as a potential housing site. **As an alternative, we would request that the Council considers**

land adjacent to The Saddlers Public House as a possible housing site in accordance with draft Policy H3. The attached plan shows the extent of the site and how the site could accommodate 14 dwellings. The site is an edge of settlement site which would round off the village.

The proposed site is a more suitable residential development site for New Yatt as it is better related to existing development. The site will not extend built up development into adjacent countryside beyond the existing settlement boundary. The proposed site follows the existing linear development along the south side of New Yatt Lane but the boundary of the site is such that development will not extend beyond the already established settlement edge on the north side of New Yatt Lane. The layout of the site is such that the detached dwellings on the western side of the site would form a clear settlement boundary.

Site HNPO2 comprises agricultural land where development will result in encroachment into open countryside to the north of the site extending beyond the current development boundary created by gardens of properties to the east, fronting New Yatt Lane. The site is separate from the village, out of keeping with the existing settlement pattern and if developed, would encourage further development to the rear of properties on the north side of New Yatt Lane.

The proposed site, on the south side of New Yatt Lane, is bounded by existing residential development to the east and to the north and to the south by existing hedgerow and trees. It would not be necessary for development to go beyond this natural boundary and thus development would not extend beyond the existing boundary line created by the Saddlers Arms public house and gardens of existing dwellings along the south side of New Yatt Lane. The existing tree group at the north-west corner of the site can be retained and will help assimilate the development into its surroundings and retain the landscape buffer on the approach to the village.

The proposed site is capable of providing both a mix of housing types and sizes, in accordance with proposed Policy H5, and will comply with relevant affordable housing policy.

In conclusion, the proposed site would be a logical compliment to the pattern of development, unlike the submitted site, which would extend the built-up limits of New Yatt. The WODC Design Guide recognises that New Yatt is linear in form and the proposed site is in keeping with that identified form. Also, the site is available and can be developed within the 2015-2031 timeframe of the Neighbourhood Plan.



New Yatt residents

A number of similar responses to the consultation have been received – in order to avoid duplication, here is a summary:

Needs a policy on Fast broadband to New Yatt

The proposed development is too large for the size of the hamlet of New Yatt. With houses built recently this would mean New Yatt will have expanded by more than 43% since 2015. This is unacceptable and clearly changes the nature of the hamlet.

The HNP states that new development should not be isolated from facilities and services. There is no bus service in New Yatt and the distance to both primary schools is too great to walk on a regular basis. The routes to both schools and to Witney are not safe for adult walkers let alone children.

Being a hamlet we do not have facilities or services, which is part of the attraction of living in a hamlet rather than a village or a town.

One of the HNP objectives is to endeavour to correspond to the wishes of residents.

Another HNP objective is no unneighbourly development on back land and significantly reducing the privacy of adjoining properties- this development clearly contravenes those objectives as well as not protecting or enhancing landscape and views.

It may be an assumption but most people living in affordable housing tend to need facilities and services within a safe walking distance. New Yatt does not provide this and is probably an unsuitable place for affordable housing as much as we support the principal of affordable housing as a need in society.

The proposed development extends the western boundary of New Yatt and cannot be classed as 'infill' development.

The utility services are unlikely to be able to accommodate a 43% increase in use. We have recently had 2 or 3 water leaks which needed to be fixed by Thames Water.

The inevitable increase in traffic would make the narrow and pot holed roads even more dangerous than they are now.

We are very concerned about the red line on the plan which is supposed to be a building line. This is clearly incorrect as it is a line from the last building down a lane off the road. It has not been drawn in relation to the properties on New Yatt Lane. It is not correct. One property, Windy Ridge, on this road which was built some years ago was refused permission to be further back on its plot because of the building line.

CO1. This proposed development contradicts "the need to travel particularly by car can be minimised"

CO4. Contradicts "meet housing needs and reduce the need to travel"

More people WILL be isolated as New Yatt has no travel services or facilities for young families or the elderly. Should a bus service be reinstated there is very little footpath for children to walk to catch a school bus at the end of New Yatt Lane

I have further concerns that the infrastructure of local domestic services will not be able to cope with this sudden additional load which will directly impact those of us in the close vicinity. I note the inclusion of several units of 'affordable housing' but am puzzled about who will want to purchase them as there is no public transport service available in the hamlet any more so any family living there will need the use of two cars. There are no schools in walking distance. In any case I fear that the affordable housing has only been added to these draft plans in order to give them a veneer of acceptability. At the next stage in the planning process they will disappear.

There is and has been room within our small community for the addition of one or two houses – although the fact that two out of the three most recent buildings remain unsold suggests that not everything built

will sell. I am sure that there would be no objection to well thought through proposals but this is not one of them. I am strongly opposed.

I do not consider the housing proposal for New Yatt to be appropriate.

I do not believe that it is appropriate to have an illustrative layout within the Neighbourhood Plan for a proposed layout that is not yet subject to a formal planning application. Its inclusion implies that the Hailey Parish Council are in favour of such a plan as illustrated. This proposal has not been discussed by the Parish Council in open forum and should not be included in its current format.

The proposed design shows a cul-de-sac which is not in keeping with the intrinsic nature of this hamlet. The number of houses proposed is a massive proportional increase which is unsustainable given the lack of facilities & public services (Eg: there is no bus service), and general lack of infrastructure within New Yatt.

The consultation conducted in 2016 regarding the number of new homes that should be delivered within the HNP area resulted in a target number of 30. We have 9 new homes approved at Giernalls road and a further 15 proposed adjacent to Witney Rugby Club which would leave 6 to find. It seems to me that 6 might be a more appropriate number to consider in this location, subject to a final plan.