

# Comments for Planning Application I4/01671/OUT by Hailey Parish Council

## Application Summary Application Number: I4/01671/OUT

Address: Land North West of Woodstock Road Witney Oxfordshire

Proposal: Outline application for the erection of up to 200 residential dwellings and associated vehicular, pedestrian and cycle access, related highway works, drainage and landscape works including provision of public open space (Amended)

Case Officer: Phil Shaw

## Compliance with WODC Local Plan policy WIT2 North Witney Strategic Development Area (1,400 homes)

The Local Plan identifies that the NW SDA is to be delivered in a number of phases (Policy WIT2 (c) and at paragraph 9.2.49. Policy WIT2 (b) notes that the proposals need to come forward in accordance with an agreed masterplan for the whole of the NW SDA.

This masterplan must provide a consistent base; it is not acceptable for each site to provide its own individual assessment given that infrastructure requirements and contributions will be based upon this. It would be unhelpful to have 3(?) developers views on the site-wide impact and an OCC and WODC viewpoint as this would lead to protracted negotiations. Rather, a consistent, site-wide and robust assessment of the impact and infrastructure required that is agreed by all parties, is needed from the outset.

However this application does not contain a masterplan and does not demonstrate how the application site contributes to the wider vision and infrastructure of the full site.

This application **is therefore not policy compliant.**

## Transport

Para 5.1 of the Transport report states the following:

5.1 OCC provided a pre-application Scoping Response dated 27th December 2017 and identified the following S106 Contributions that are necessary to deliver the proposed development of 200 units at Woodstock Road:

**Table 5.1: Identified S106 Contributions Infrastructure**

	<b>200 houses</b>	<b>1,400 houses</b>
S106 Contribution A40 / Shores Green Slip Roads (SGSR)	£883,238	£6,182,666
North Witney West End Link (WELR)	£2,521,429	£17,650,000
North-East Witney Public Transport Strategy	£200,000	£1,400,000
Bus Improvements A4094 Woodstock Road	£10,410	£72,870
Travel Plan Monitoring	£1,240	£8,680
<b>Total</b>	<b>£3,616,207</b>	<b>£25,313,450</b>

## **SGSR**

The cost of the Shore's Green slip roads was estimated in WODC's Infrastructure Development Plan (November 2016) as £5.6m. The contribution of £883,238 or £6.2m for the whole site appears to represent the total cost of the SGSR, allowing for inflation. However the WODC Local Plan policy WIT1 East Witney c) requires the East Witney SDA to make a financial contribution to the SGSR which is in addition to the financial contribution already made by the Burford road housing development.

Policy WIT2 NWSDA does not contain any requirement to contribute to the cost of the SGSR and if this contribution is made it will reduce the S106 funds available for other infrastructure requirements or will reduce the proportion of affordable housing.

**Hailey Parish Council strongly objects to this proposed S106 contribution to the SGSR.**

## **West End Link road**

The Inspector of the Local Plan stated

*“Evidence demonstrates that, to be acceptable in transport terms, development of 1,400 dwellings would require the construction of the West End Link Road”*

In other words if the link road is not built then the 1,400 houses should not be built. It is therefore essential that WIT2 policy c) requiring development to be phased in accordance with the timing of supporting infrastructure (this phasing has not yet been agreed) and the developer has to provide appropriate financial contributions.

The cost of the West End link road was estimated in WODC's Infrastructure Development Plan (IDP) (November 2016) as £23.2m – a 2015 estimate. Allowing for ten(?) years of inflation the cost is likely to be around £30m when construction begins.

The NWSGA contribution identified in the table above is £17.65m. There is a significant funding shortfall against the 2015 WODC IDP estimate of 23.2m and an even more substantial shortfall against the forecast allowing for inflation.

## **Where is the funding for this shortfall to come from?**

This combination of policy and guidance could simply stop both the development of North Witney and commencement of the building of the West End link road. If, for example, traffic studies and forecasts indicated that development of the West End link road should commence once 500 houses were constructed and the “appropriate” contribution from the developer fell short of the full funding required, where would the balance of funding come from?

**It is critical that at a very early stage an updated set of costing for the link road is prepared along with full identification of how the project will be funded and the trigger point for the commencement of the construction of the West End Link Road (i.e. how many houses will be permitted to be constructed before the construction of WEL has to start).**

## Flood mitigation

Although there are no flooding issues we wish to raise associated with application site we would point out that there are unresolved flood mitigation issue for the remaining areas of the whole site. Policy WIT2 I) calls for ‘appropriate measures to mitigate flood risk... which may include consideration of offsite solutions’

During the evolution of the Local Plan there have been a number of ‘solutions’ – some, hilariously assuming that water moves uphill - that seek to avoid making the existing flooding risk around the adjoining Eastfield Road and along Hailey Road in Witney.

Despite repeated requests during the evolution of the Local Plan, a solution to the flooding issues associated with the NWSDA has not come forward.

**It is essential that a robust flood mitigation plan is submitted along with costings and the identification of any land extension to the NW footprint. The identification of the share of these costs to be borne by this application will also be required.**

## Landscape enhancement

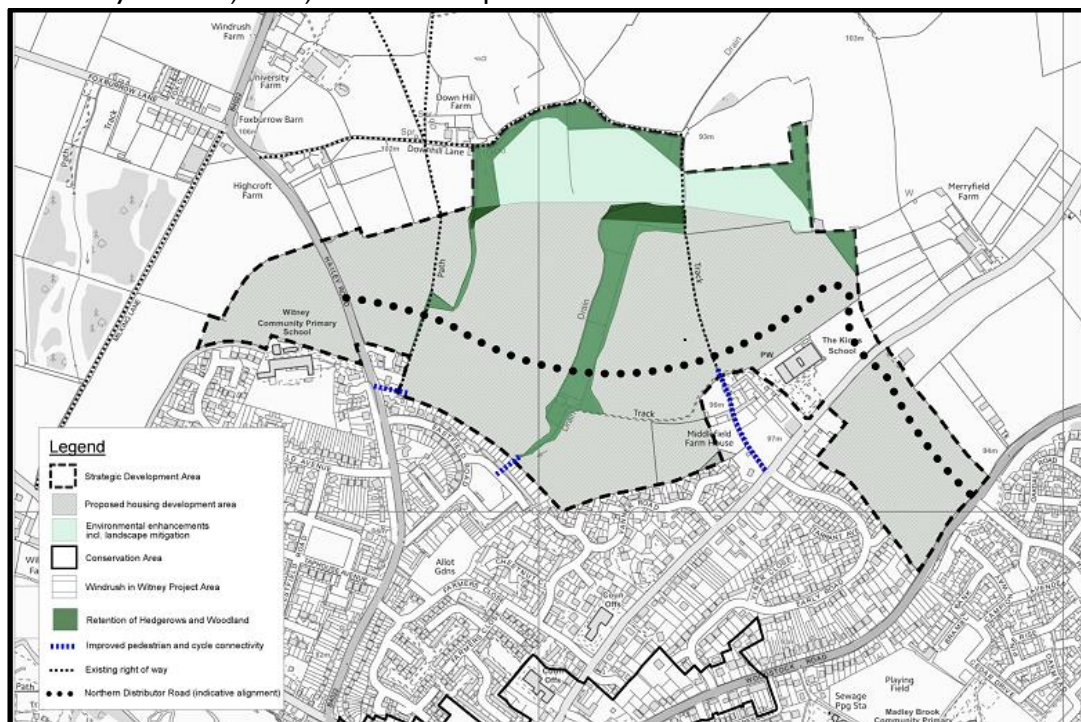
The Local Plan Inspector o the Local Plan stated:

*The site is located in an area of acknowledged high landscape sensitivity and concern has been raised at the intention to provide for around 1,400 dwellings in the light of the 2012 Kirkham Landscape Study, which indicates the estimated housing capacity of the site as 750-800 dwellings.*

...

*My conclusion that the allocation [of 1,400 dwellings] is likely to be acceptable in landscape terms is based on the area of environmental enhancement shown on the policies map (Fig 9.2d) and, on this basis, there is not good reason for this area to be altered or shown to be indicative.*

The Inspector is clear that the light green area of the map below should be developed as a landscape buffer (e.g. woodland) and the dark green areas of existing hedgerows and woodland should be retained. Policy WIT2 h) and i) cover this requirement.



There is a wealth of woodland and landscape development experience within Hailey associated with the recent developments of the Community Woodland (Breach wood trust) and the Foxburrow Wood (Wychwood Project) development.

**Hailey Parish Council in association with the above organisations seeks an early meeting to discuss appropriate development and subsequent maintenance of the North Witney landscape buffer. An early release of land associated with the landscape buffer is requested to enable early establishment of the buffer.**

### **Community facilities**

Although WODC's policy WIT2 (North Witney) does not specifically define any required community facilities (apart from allotments) the WODC Infrastructure Development Plan (November 2016) refers to :

- Provision for new community facilities as part of large-scale development across the District
- Enhanced Library Provision
- Children's play areas
- New and/or enhanced cemetery provision across the District
- Informal open space – provision of and improvements to including accessible natural green space across the District
- Additional outdoor playing pitch provision and changing facilities in Witney
- Replacement of Windrush Leisure Centre, Witney.

### **Community Centre**

Most of Witney's community facilities are too far away and primarily located south of the river.

A new Community centre will be required and should include:

- main activity and assembly space
- entrance foyer
- equipment and furniture store
- kitchen
- toilets, including disabled facilities
- changing provision
- cleaner's store
- an office
- changing / dressing rooms and showers
- licensed bar
- permanent or collapsible 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.

### **Sharing and integrating facilities**

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 / 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.

### **Playing pitch provision**

Section 7 of WODC's Playing Pitch Strategy<sup>1</sup> contains suggested standards for grass pitches:

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<sup>1</sup> <https://www.westoxon.gov.uk/media/765284/Playing-Pitch-Strategy-2014.pdf>

*A new minimum standard 1.60 ha per 1000 people of dedicated grass pitch sport space is proposed both as a basis for a contribution from new housing and as a **minimum target** for provision across the local authority area. In practice, much pitch sport occurs on multifunctional space. As far as possible new outdoor sports space should be dedicated to that use, so avoiding some of the problems arising from multi use cited above. Inevitably, pitch sports will continue to be played in some parks and recreation grounds, and also on school sites. This minimum standard does not cover provision of synthetic turf pitches (STPs) and other relevant outdoor sports spaces.*

Once completed, the population of the North Witney Development will exceed 3,500 using a metric of 2.5 people per household. This equates to a minimum pitch area of 5.6 hectares, using the recommended WODC standards<sup>2</sup>. We also suggest that within this target a 3G pitch (i.e. astro turf) be included.

### **Playing pitch provision**

**Development of community facilities related to North Witney should include the provision of at least 5.6 hectares of land suitable for playing pitches (as set out in WODC's Playing Pitch Strategy) of which at least one should be a 3G pitch. Pitches should be located either on site or within the Hailey Parish if there is insufficient land available (e.g. Witney Rugby Club and/or adjacent to the Hailey Recreation ground). This provision should include appropriate changing facilities.**

### **Play Spaces**

The community in Hailey (via Project Hailey) has substantial experience in developing play spaces for children, young people and adults. There will clearly be a requirement for appropriate play spaces within the North Witney development and the community should be involved in its planning and development. Ideally land should be made available to the Parish Council, along with appropriate funding, to enable them to facilitate an agreed play area provision. The applicant proposes the inclusion of a small play area within the development of the 200 houses. We would suggest a single large play area, rather than several small play areas scattered in various phases of the development. This large play area should be large enough to accommodate a Multi Use Games Area or MUGA.

### **Play Area provision**

**Development of North Witney community facilities should contribute towards the provision of high quality play and activity areas<sup>3</sup> for children and young people, designed in consultation with the local community. There should be sufficient funding to ensure that the play spaces can be maintained to an appropriate standard. The location of any new play spaces should be such that access by the local community is maximised.**

### **Allotments**

The requirement for the provision of allotments is established in policy WIT2 k):

[provision of appropriate green infrastructure, including allotments.](#)

An allotment is traditionally measured in rods, perches or poles, an old measurement system dating back to Anglo-Saxon times. 10 poles is the accepted size of an allotment, the equivalent of 250 square metres. There is no legal national minimum provision standard, but councils do have to audit allotments, set standards of provision, and assess their actual provision. Most allotment strategies quote the 1969 Thorpe Report which recommends a minimum provision equivalent to 15 allotments

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<sup>2</sup> Based on Fields in Trust recommended benchmarks

<sup>3</sup> Fields in Trust standards should be applied

per 1,000 households, but this is not legally binding. The standard adopted by WODC is 0.25 hectares (10 allotments) per 1,000 residents. This would result in the provision of 35 allotments (i.e. 0.875 hectares) associated with the North Witney development.

In Hailey Parish there is a short waiting list for allotments indicating that the proportion of allotments per head of population is in balance (currently 30 allotments for just under 500 households). The addition of 1,400 houses would require the provision of an additional 84 allotments to achieve the same balance.

Although there are allotments in Witney, they are at capacity and there is a long waiting list of residents seeking an allotment. Just as Hailey Parish Council does not accept allotment requests from residents located outside Hailey Parish, the same is true of Witney Town Council.

### **Allotment provision**

**Development of North Witney community facilities should include the provision of sufficient land to provide for up to 84 allotments (2.1 hectares) either on site or within easily accessible distance.**

### **Burial ground capacity**

All 1,210 residents (2010 Census) of the HNP Area have the right to be buried in the Burial Ground, Church Lane, Hailey (previously known as the Glebe Field). There is sufficient capacity to accommodate the current population of the HNP Area for about 40 years (based on the average demand over the last five years). However the addition of the residents of the North Witney development (estimated at 3,500 – WODC metric) reduces this capacity to only 11.3 years. This will require the acquisition of additional land suitable for use as a Burial Ground.

### **Burial Ground provision**

**Development of North Witney community facilities should include the provision of suitable Burial Ground capacity to accommodate the additional demand arising from the quadrupling of the population within the parish.**

## **Health, Health Care and Wellbeing**

As identified above it is essential that sufficient resource is provided to ensure that new development is well connected to Witney and community facilities, especially by public transport, walking and cycle paths and that existing routes are improved.

Almost 19 percent of residents' day-to-day activities are limited by a long-term health problems or disability, reflecting Hailey's higher-than-average number of older residents. The existence of Middletown Grange care home contributes to a significant portion of this statistic.

Among older people, Hailey sits within the least income-deprived groups.

There are no medical practices, opticians, dentists or dispensaries located within Hailey Parish. Most residents seek health care from one of the three GP surgeries in Witney or from the Witney Community Hospital which contains a Minor Injuries Unit.

More serious medical problems are usually referred to the John Radcliffe hospital complex in Oxford.

In the HNP questionnaire, residents identified the building of an NHS surgery / Health Centre (as part of the North Witney development) as having the highest priority.

### **Health Care**

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

## Utilities

We request that all houses are fitted with three phase electrical supplies to enable **electric vehicle charging points** to be fitted.

We request the installation of **Fibre to the premises (FTTP)** infrastructure – i.e. a pure fibre connection all the way from the exchange into the houses or business in the NW development.

## Dark Night Skies

The Hailey Neighbourhood Plan contains the following policy on Dark Night Skies.

1. Although never previously articulated through a written policy Hailey Parish Council has always endeavoured to apply the principles of a dark skies policy. The Parish Council has managed to resist the installation of street lighting in all developments over the last 75 years. Whilst recognising the safety issues arising from a dark skies policy, past experience has persuaded the Council that, on balance, the environmental benefits outweigh the safety concerns.

2. The Neighbourhood Plan policy detailed below applies to any proposal which involves the installation of external lighting and where the design of developments may result in light spill from internal lighting. The Policy will also apply to specific lighting schemes which require planning permission or listed building consent, including installing:

- a lighting scheme of such nature and scale that it would represent an engineering operation (i.e. requiring a separate structure) and typically be undertaken by specialist lighting engineers;
- lighting such as the floodlighting of sports pitches, car parking or ménages; and
- a lighting scheme on a listed building that would significantly affect its character.

3. The Institute of Lighting Professionals Guidance <sup>4</sup> sets out specific constraints for lighting within environmental zones – see table below. Within each zone, targets are applied for sky-glow, light intrusion, glare, luminaire intensity and building luminance. Any proposed lighting should meet the guidance.

Much of the rural landscape will be an E1 ‘Intrinsically Dark’ zone, but this should be checked prior to an application. The Authority will encourage further reductions, for example by removing below or near horizontal light paths from fixtures or adopting E1 specifications in an E3 zone, wherever feasible. Often this can be achieved with little further disruption.

Zone	Surrounding	Lighting Environment	Descriptions
E0	Protected	Dark <sup>5</sup>	UNESCO Starlight reserves, IDA Dark Sky Parks
E1	Natural	Intrinsically Dark	Areas with intrinsically dark landscapes (roads usually unlit)
E2	Rural	Low district	Areas of low ambient brightness.

<sup>4</sup> The Institute of Lighting Professionals Report - Guidance Notes on the reduction of obtrusive light

<sup>5</sup> To be considered a dark sky of sufficient quality by the International Dark-Sky Association, values of 20 magnitudes per arc second must be achieved.

		brightness	Village or relatively dark outer suburban locations
E3	Suburban	Medium district brightness	Areas of medium ambient brightness. Small town centres of suburban locations.
E4	Urban	High district brightness	Areas of high ambient brightness. Town/city centres with high levels of night-time activity.

As the NWSDA falls within the Hailey Neighbourhood Plan area the developer is requested to take note of and ensure that the development conforms to the following policy:

### **Dark Night Skies Policy**

1. Development proposals that conserve and enhance relative tranquillity, in relation to light pollution and dark night skies, and comply with other relevant policies will be permitted, provided it can be demonstrated that they meet or exceed the Institute of Lighting Professionals guidance and other relevant standards or guidance (CIE 150:2003 Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations) for lighting within the Hailey Neighbourhood Plan Area, and have regard to the following hierarchy:

- a) The installation of lighting is avoided;
- b) If lighting is installed it is necessary for its intended purpose or use and any adverse impacts are avoided; and
- c) If it is demonstrated that (a) or (b) is not achievable, then adverse impacts are appropriately mitigated.

2. To be appropriate, lighting for development proposals should ensure that:

- a) The measured and observed sky quality in the surrounding area is not reduced;
- b) Lighting is not unnecessarily visible in nearby designated and key habitats;
- c) The visibility of lighting from the surrounding landscape is avoided; and
- d) Building design that results in increased light spill from internal lighting is avoided, unless suitable mitigation measures are implemented.

G A L Knaggs  
9<sup>th</sup> May 2019