

Vale of White Horse EIP – Stage 2 – February 2015

North Abingdon Local Planning Group Comments

Matter 7 – Supporting Infrastructure and Services (CP7, CP12, CP17-CP19, CP21 and CP33 – CP36) Thursday 18 February AM

7.1 Does the plan make adequate and soundly-based provision for the infrastructure and services necessary to support new development?

CP7 Infrastructure and Services

Overall, the Plan, particularly with regard to N&NW Abingdon, fails to fully meet Strategic Objective 7.

One section of the policy:

iii. as a last resort, refuse planning permission if the development would be unsustainable without inclusion of the unfunded infrastructure requirements.

Is clearer as:

iii. as a last resort, refuse planning permission if infrastructure requirements are unfunded making the development unsustainable.

Community Infrastructure Levy (CIL)

The cost of modifications to local roads and highways required to manage the increase in traffic and pollution will far exceed the Community Infrastructure Levy (and other sources of funding). Our analysis of the CIL scheme showed that the total income from sales might be allocated as follows:

Existing land value	0.5%
Profit on land	11.0%
Construction and fees	66%
Builders profits	20%
CIL	3%
Total income from sales	100%

So CIL is only 3% of the total income from sales. This contrasts sharply with the 31% share of profits - 11% share for profit on the land and 20% for builders. Consideration of actual profit figures for three different builders over five years, showed profits on average of 9.6% but actually varying from 1.7% to 16.0%. So

there is more than enough room to reduce these profits to provide more CIL (or S106) and improve the infrastructure proposals.

Infrastructure Development Plan

Comments on specific shortcomings in the Infrastructure Development Plan for the NW and N Abingdon sites follow. However, the following items are welcome:

- Provision for increasing primary and secondary school places and Special Educational Need provision.
- Contribution towards public transport (NW site only).
- Provision of Multi Use Games Areas (MUGA), cricket and football pitches, a clubhouse and off site leisure provision.
- Provision of a community hall, perhaps in the Primary School for out of hours use and possibly a venue/site for a church.
- Site specific public and other transport works.
- Upgrades to sewage works.

South facing slip roads at Lodge Hill

See later comments about policy CP34

Dunmore Road and Twelve Acre Drive

Necessary improvements to Dunmore Road and Twelve Acre Drive are to be funded by the County Council (Infrastructure Delivery Plan Appendix 1) but continuing local government cuts mean this is unlikely.

Appendix A for the Abingdon North site suggests that the houses should front onto Dunmore Road. This is a noisy road and an unattractive prospect. Very few of the Long Furlong houses face into Dunmore Road – for good reason. Figure 15 of the EIA Scoping Opinion application for the North Abingdon site¹ retains the existing hedge, has a green strip and a cycle track which gives much better separation from the road.

Timing of road improvements

Widening the A34 (M40 to Chilton), a second River Crossing and link road to Culham, a full diamond Junction at Lodge Hill A34 and roundabouts on Twelve Acre Drive and Dunmore Road are all improvements that are needed before any housing development. But there are no plans to widen the A34 and the recently published

¹ Copied at the end of this document. Reference number P15/V2771/SCO on the Vale website. Link <http://www.whitehorsedc.gov.uk/java/support/Main.jsp?MODULE=ApplicationDetails&REF=P15/V2771/SCO>

Government Roads plan does not include any of these necessary upgrades. So there will not be the infrastructure needed to support the proposed development in a suitable timescale.

Flooding

In 2007 around 100mm (4 inches) of rain fell in a day² on the site. This led to local flooding where streams run off the land through the Northern parts of Abingdon – on Farm Road. There has also been flooding on Twelve Acre Drive near Barfleur Close. Such dramatic events are much more likely in future, could be even more dramatic and they need to be planned for. When the fields are developed, many steps need to be taken to ensure that the rate of run off from major incidents is not more than can be handled by the drains and watercourses through North Abingdon.

Health Care and Other issues

The proposed housing will increase traffic emissions on Dunmore Road, Twelve Acre Drive and in central Abingdon where they already exceed limits.

We understand that the existing GP practice on the Long Furlong estate is full.

The Tilsley Park floodlights will cause light pollution to the proposed properties on the eastern end of the site.³

Building houses so close to the A34 to the North and North-west of Abingdon will result in significant noise and atmospheric pollution for residents. Mitigation is mentioned in the plan, but road noise from the A34 (and the busy Dunmore road) already affects the existing Long Furlong development and it will have more effects on the proposed new site to closer proximity, as sound levels decrease by the inverse square law ($1/r^2$) of distance from the sound source. Pollution may be a problem nearer to the A34. Also at some stage the A34 may be widened and space should be left for this to happen. Thus steps to cater for these problems will be needed. Options seem to be a tall and heavy fence along the A34 or a long mound of earth with trees and bushes on it – or maybe both? Similar measures to protect Westminster Way alongside the A34 to the north of Botley have been ineffective. Developments should not be built so close to the A34 as no mitigation mechanism would be sufficiently effective.

A recent accident on the A34 in which a coach was shunted down the bank near Drayton illustrates the vulnerability of any development site adjacent to the A34 to accidents or fuel/chemical spills.

² www.ceh.ac.uk/sites/default/files/ceh_floodingappraisal.pdf

³ The Scoping report mentions this issue.

Other issues such as provision of electricity, phone, gas, water supply and sewage systems are of some concern to us as they could cause disruption to existing residents during development.

The EIA Scoping Application

The EIA Scoping Opinion application for the North Abingdon site⁴ shows how it might develop. It includes space for the primary school, a 'Local Centre', a sports area and pavilion, cycleways, buffer planting, retained trees and SUDS areas.

However:

- The application mentions up to 900 houses⁵, whereas the figure in the plan is 'around 800 homes'. We don't regard 900 as 'around 800'. It is 12.5% more. If all Part 1 strategic sites in the Vale (13,960 houses) are allowed 12.5% more, that is 1,745 more houses!
- Also as we have noted separately, the figure of 800 should be reduced by 100 as a large part of the Eastern edge of the site has been kept in the Green Belt. We have said that it is anomalous to label land in the green belt as a housing development site as well. In the Scoping plan⁶ the anomalous land is shown as 'retained agricultural land', buffer planting and three football pitches⁷. Attempting to sort out the possible consequences, let's assume that the plan is changed so the anomalous area remains entirely in the Green Belt. Then various difficult questions arise:
 - Is it reasonable to use the anomalous area including sports fields and particularly the land that will remain as agricultural, when calculating the number of houses that can be put onto the North Abingdon site? Is this approach widely used in elsewhere?
 - To meet the requirement for sports fields on the North Abingdon site, is it reasonable to use part of the anomalous land, which in this scenario is adjacent Green Belt land? Does this approach apply to every site that has a green belt edge?

A possible solution is to divide the anomalous land, with the football pitches remaining as developable land but with the surrounding buffer planting and

⁴ Reference number P15/V2771/SCO on the Vale website. See final page of this document. Link at: <http://www.whitehorsedc.gov.uk/java/support/Main.jsp?MODULE=ApplicationDetails&REF=P15/V2771/SCO>

⁵ Scoping report Para 2.16, page 5

⁶ Scoping report, Figure 15, page 149 (final page)

⁷ The Infrastructure Delivery Plan requires 2.4 hectares for football pitches, an MUGA and a cricket pitch. Football pitches vary from 90 to 120 metres long and 45 to 90 metres wide – so from 0.41 to 1.08 hectares. So broadly 2.4 hectares means around 3 football pitches plus surrounding areas and space for a clubhouse.

'retained agricultural land' remaining in the Green Belt. Then there should be a published, transparent and clear calculation of the figure of 800 and the lower number of houses permitted on the whole site. The figure should be precise and not an 'around' figure. There should be an opportunity to comment on the figure before it is included in the Plan.

- Road crossing points for pedestrian and cyclists are shown on the Scoping plan, but light controlled crossings are required. The existing 'crossings' on Dunmore Road which have a traffic island are inadequate for children, cyclists and less mobile people trying to get across the uninterrupted traffic flow.
- Similarly four 'priority T junctions' are mentioned⁸. Apparently not light controlled⁹. Our experience of existing T junctions onto Dunmore Road is that when traffic is moving freely, it is very difficult to turn right. Provision of roundabouts or traffic lights would be less frustrating and safer, and would interrupt the unrestricted flows along the roads making it easier to join and cross.
- Noise from A34 remains a concern. Residents of existing properties find the noise intrusive and it would be excessively intrusive in the proposed dwellings immediately alongside the A34.
- Flats are mentioned as an option¹⁰, but given the elevated nature of the site, we don't think that anything over two storeys high should be permitted.

CP12 Safeguard land for Strategic Highway Improvements Abingdon-on-Thames and Oxford fringe

We support this proposal, though subject to the comments on the South facing slip roads at Lodge Hill. It is also important that the distant possibility of widening the A34 is allowed for, along its whole length.

CP17 – 19 & 21

No comments.

CP33 Promoting Sustainable Transport and Accessibility

We support sustainable transport and reducing the impact of travel.

⁸ Scoping report, Para 2.1, Appendix 5, page 60

⁹ See TD 42/95, Page 7/20, Figure 7/17 at

<http://www.standardsforhighways.co.uk/dmr/vol6/section2/td4295.pdf>

¹⁰ Scoping report, Para 2.4, Appendix 5, page 61

We have serious concerns about air quality issues (item vi in the policy), which we have raised separately.

CP 33 Sustainable transport

The NPPF states that: *“developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised”*.¹¹ This does not seem to be adhered to in the North Abingdon proposal:

- Placing housing to the North/north-west of Abingdon when the main employment opportunities are to the south of the town will place additional stresses on the road network; the distances are such that walking and cycling are not really an option; buses do not serve these routes. The vulnerability of A34 and lack of alternative routes leads to severe congestion at peak times, and at other times if there is an incident. Increased traffic through Abingdon to Culham Science Centre, and round the orbital road will increase air pollution in the town.
- The proposal does not in any way help with access to Oxford. It can already take an hour to travel the 6 miles from N Abingdon to the centre of Oxford at peak times, and the huge number of additional vehicles on the A34 from the new developments will increase this significantly.
- In order to promote walking and cycling, the distances from house to work should be 1 mile or 5 miles respectively. Thus the the additional housing required by jobs growth should be located nearer the employment sites, nearer to the Science Vale – where 70% of the new employment will be located. This reduces the commuting distances and opens up the possibility of cycling and walking to work which is more environmentally-friendly.
- Residents are concerned about existing traffic problems and we consider that the new development will make things worse

CP34 A34 Strategy

We value the commitment to a ‘Route Based Strategy’ (6.68 p.110) for the A34, but are not sure what other approach could have been adopted for a road.

CP 34 is unspecific so much needed improvements to the A34, key to the Science Vale development, may never happen.

The funding of the required new A34 interchange at Lodge Hill (N. Abingdon) partly comes from the LEP (Infrastructure Delivery Plan Appendix 1) but this is not

¹¹ CLG (2012). National Planning Policy Framework. Paragraph 34

guaranteed. The effectiveness of this approach has not yet been established. It may not be the solution to traffic problems in Abingdon that people want.

The proposed housing developments to the north and north-west of Abingdon will only exacerbate problems on the A34. It would be better to locate the new housing within walking/cycling distance of new employment opportunities.

Lodge Hill improvements?

Residents leaving the new estates onto Twelve Acre Drive or Dunmore Road by car to head South on the A34 towards Didcot could have a choice – to continue round Dunmore Road to the Marcham/Tesco A34 junction or to use the new South facing slips and risk queues on a longer trip down a busy A34. The route round Abingdon has a constriction by Abingdon Hospital. However, either way additional traffic will use the A34, which is at capacity or go through Abingdon.

Also traffic in the regular Northbound queue on the A34 will be able to turn off at Lodge Hill, crowding onto the old Oxford Road through Bagley Wood and other minor routes.

A34 improvements?

The A34 has no hard shoulder, has heavy traffic (>66,000 vehicles/day south of Oxford) and is vulnerable to excessive congestion when a vehicle is forced to stop for any reason. Major accidents cause severe delays on the A34 and also congestion in Abingdon as vehicles divert.

Recent nearby A34 incidents on:

- 15/12/14 - overnight closure.
- 19/1/15 - both lanes closed for over 9 hours.
- 26/2/15 - southbound side closed for 11 hours.
- 1/12/15 - outer lanes closed in both directions for about 12 hours

The November 2014 government announcement on roads allocated only CTV and information signs for the A34 along with minor changes to approach roads to two junctions north of Oxford. Once these are in place, drivers will know how many miles long the queue is, but the long queues will be no less frequent.

According to modelling carried out on behalf of OCC Highways (by CH2M Hill and Atkins), the A34 is probably not capable of coping with the additional traffic derived from the proposed developments in the Vale, without significant investment to improve junctions and road width – requiring more funding than the development can supply. The Vale Plan 2031 seems to think that having houses in the N & NW sites would enable the building of a diamond interchange at Lodge Hill. However, the increase in traffic at either this upgraded interchange or at Marcham would tend to

increase problems on the A34, unless this was widened at the same time. The proposed road widening scheme would be essential from Marcham to Botley to ease the traffic flow as mentioned in the Appendices to the plan. But the development will not generate sufficient funds to cover the enormous expense. There are no plans at all to widen the A34 (between Chilton and M40) in the Chancellor's recent statement on £15Bn road investment.

Science bridge?

Mitigation measures of widening the A34 and an additional river crossing to the south of Abingdon (to access the Culham Science Park) will require substantial investment well beyond the scope of CIL (Community Infrastructure Levy). ETI Stage 5 is essentially the final version of the Plan without any transport mitigation (which are described as ETI stages 5A-5C). In all of these, however, the A34 was assessed as being above capacity for morning and evening peaks between Chilton, Marcham and Botley. For Stage 5 with the additional housing on Green Belt land to the north of Abingdon, average speeds on the A34 are estimated to be 43-45 km/h (~ 27-28 mph) – and above capacity (para 7.3.7).

Air quality

Again, we have serious concerns about air quality (2nd paragraph of the policy), which we have raised separately. We think that air quality along the A34 should be monitored where groups of houses are near to the road, for example in the two proposed Abingdon sites and Botley. Meadows are worth preserving, but so are people!

CP35 Promoting Public Transport, Cycling and Walking

We support this policy.

Cycle routes into Abingdon from both N & NW Abingdon sites should be reviewed and improved using CIL. This would be more of a priority for us and the new residents than the Lodge Hill slip roads. People will need clear routes to get to secondary school, college and the town centre.

A crossing on Lodge Hill would be essential to cross to the new primary school. It is a dangerous road – a pensioner was killed nearby in December 2014. Pathways and cycle routes will be needed to promote walking and cycling within the community, but the necessary crossings will slow down traffic flow.

There are also currently no bus services along Dunmore Road and Twelve Acre Drive that connect to main employment locations. These would need to be provided – complete with lay-bys, so as not to impede traffic flow.

Paragraph 6.74 refers to Figure 5.6c (p. 78) which should show proposed new bus routes. However some of the routes shown clearly exist routes (e.g. Abingdon to Oxford) so the additional provision is not clear.

CP 36 Electronic Communications

We support this policy.

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3 January 2016**

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Scoping Report North Abingdon Site - Figure 15

