

# Vale of White Horse EIP – Stage 2 – February 2015

## North Abingdon Local Planning Group Comments

### Matter 12 – District Wide Policies CP1, CP22 – CP26, CP28 - 32 and CP37 - CP46) Wednesday 17 February All day

#### 12.1 Are the policies relating to the presumption in favour of sustainable development and building healthy and sustainable communities soundly based?

##### (a) Presumption in Favour of Sustainable Development (CP1)

The economic, social and environmental elements of Sustainable development are explained in the Plan (Chapter 1, page 15).

We support the Council's approach, but note that there is no mention of 'sustainable development' in policy CP1 apart from the title. That could be remedied by adding words to the second paragraph of the policy as shown by underlining below:

*Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant planning permission for sustainable development, unless material considerations indicate otherwise, and unless:*

##### (b) Housing Mix (CP22)

We support this policy.

##### (c) Housing Density (CP23)

We have commented separately on Density in our response to Matter 11, broadly as follows:

Core Policy 23 is in Chapter 6, page 93. This sets a target net density of at least 30 dwellings per hectare and produced a figure for the whole Abingdon North site of 800 dwellings (though we now think that should be reduced to 700). Net Density excludes major elements of supporting uses such as open space, community facilities, infrastructure etc. The calculations of housing numbers are somewhat vague about the effects of open space. Also we have observed that a figure of 'around 800', can by some be interpreted as up to 900 (responses to Matter 5 and 7).

##### (d) Affordable Housing (CP24)

We support the policy and the 'delivery hierarchy' set out in it.

## **(e) Rural Exception Sites (CP25)**

We support the concept of providing homes for local people set out in this policy. In particular, we welcome the commitments:

- iv. Not to harm the character or setting of settlements, particularly in Areas of Outstanding Natural Beauty; and
- v. Not to undermine the purposes or visual amenities of the Oxford Green Belt

Though these have been given less consideration in other parts of the Plan than they should have...

## **(f) Accommodating Current and Future Needs of the Ageing Population (CP26)**

We support this policy.

We do note that in the EIA Scoping Opinion Report (page 8)<sup>1</sup> the County Council has identified that this site should accommodate an extra care home of around 80 units. By 2029, Abingdon is likely to require 480 Extra Care units and only 100 units have been secured to date.

This local need could be included in Appendix A page 9.

## **12.2 Are the policies relating to supporting economic prosperity soundly based?**

Our concern is that growth in the number of jobs may nowhere near the ambitious targets set in the plan.

The plan should include measures to mitigate the risks that arise as a result by releasing land only if it is clearly needed.

### **(a) New Employment Development on Unallocated Sites (CP28)**

We support this policy.

### **(b) Change of Use of Existing Employment Land and Premises (CP29)**

We support this policy.

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<sup>1</sup> 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>

See 'The Decision' at:

[http://www.whitehorsedc.gov.uk/java/support/dynamic\\_serve.jsp?ID=515214532&CODE=E76FE36D0C339E5310CD7C0D03543344](http://www.whitehorsedc.gov.uk/java/support/dynamic_serve.jsp?ID=515214532&CODE=E76FE36D0C339E5310CD7C0D03543344)

### **(c) Further and Higher Education (CP30)**

We support this policy and in particular ensuring that future locations have good public transport, pedestrian and cycle access.

### **(d) Development to Support the Visitor Economy (CP31)**

We support this policy and agree with the need to provide for visitors.

### **(e) Retail Development and other Main Town Centre Uses (CP32)**

We support this policy. We have commented separately on the current air pollution problems and the implications if nothing is done to address them and there is much new development (see Matter 8).

## **12.3 Are the policies relating to protecting the environment and responding to climate change soundly based?**

### **(a) Design and Local Distinctiveness (CP37)**

We very strongly support the excellent and comprehensive Design Guide.

### **(b) Design Strategies for Strategic and Major Development Sites (CP38)**

We strongly support the policy to require 'Site wide design strategies', 'Masterplans' and 'Design and Access Statements' for the Strategic and Major sites. In particular the proposals for further consultation with local communities.

The Scoping Opinion<sup>2</sup> has given us a glimpse of what this might look like for the North Abingdon site. We heard about this too late to comment.

### **(c) The Historic Environment (CP39)**

We support this policy. The Scoping opinion acknowledges that 'Blake's Oak' is a key historic feature on the North Abingdon site.

### **(d) Sustainable Design and Construction (CP40)**

We very strongly support this policy.

Climate change will have an increasing impact on the authority. Direct effects may be due to flooding or possibly damage from strong winds. There will also be indirect effects.

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<sup>2</sup> 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>

We note that 'water stress' will be addressed in Part 2 of the Plan.

### **(e) Renewable Energy (CP41)**

We very strongly support the development of renewable energy as a means of maintaining living standards whilst addressing climate change and energy costs.

So we support this policy very strongly.

### **(f) Flood Risk (CP42)**

We have commented separately on flood risk issues (see Matter 7). There have already been incidents where particularly heavy rain has led to flooding in some parts of North Abingdon and on the North Abingdon site itself.

If the North Abingdon site is developed with insufficient regard for the heavier rain likely as a result of climate change, this will increase the risk of flooding in the rest of Abingdon.

The North West Abingdon site is in itself at some risk of flooding, being near to a water course with associated flood risks.

So we very strongly support policy CP42.

### **(g) Natural Resources (CP43)**

We have commented separately about air quality issues (see Matter 8).

We have commented separately on the current air pollution problems and the dire implications if nothing is done to address them and there is much new development (see Matter 8).

### **(h) Landscape (CP44)**

We very strongly support this policy. It says:

*'High priority will be given to conservation and enhancement of the natural beauty of the North Wessex Downs AONB'.*

Developments are to be allowed providing that they meet eight points and:

*'do not conflict with the aims of conservation and enhancement'.*

However, we don't think that other policies in the plan pay enough attention to these desirable ends.

### **(i) Green Infrastructure (CP45)**

Maintaining and developing the Green Infrastructure on the North and North West Abingdon sites will be one key to integrating them into the existing settlement and making them good places to live.

We note that the Scoping Opinion plan does include much retained woodland, retained hedgerows, proposed buffer planting, an offset for Blake's Oak and it maintains existing footpaths and the bridleway. All this is welcome.

Sadly though, there will be damaging effects on the Green Belt.

### **(j) Conservation and Improvement of Biodiversity (CP46)**

We very strongly support this policy.

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**3 January 2016**

**Vale of White Horse EIP NALPG Comments on Matter 12.docx**

**1,199 words including all questions and headings**