

ABINGDON-ON-THAMES TOWN COUNCIL
Comments on the Local Plan 2031 Consultation

The Local Plan 2031 Part One (Strategic Sites and Policies) Consultation was fully and carefully discussed by the Council's Planning and Highways Committee at its meetings of 17th November and 8th December 2014.

The Council thanks the District Council for consulting on this matter and its comments are set out below.

These comments have been drafted by the Town Clerk under a delegation from the Committee and incorporates the points made at the Committee on the above two dates, as well as the Council's previous comments which were submitted at the previous stage of the consultation on 4th April 2014.

The Council's comments on the Local Plan are set out below in seven separate sections.

1. Housing and building sustainable communities

1.1 Need for affordable homes: There is a need more affordable homes, particularly for local people. The Council agrees with the comment on page 52 (paragraph 5.7) that Abingdon has the "highest need for affordable housing" and that this needs addressing. On the previous page (Sub-Area Strategy for Abingdon-on-Thames and Oxford Fringe) it states that Abingdon should continue to be an "attractive place to live." It should be "attractive and affordable" rather than just "attractive". There should be affordable housing for local people.

1.2 Housing requirement numbers Notwithstanding the above, there is a need to revise housing requirement numbers downwards; there are not enough local facilities for the proposed density of housing for Abingdon.

1.3 Section on Key challenges and opportunities: building sustainable communities (page 26). The following points are made:

- Paragraph 2.7 states that "people in the district generally enjoy a high standard of living." This neglects to mention that Caldecott has one of the highest levels of deprivation in the county. There are also "poverty pockets" in north Abingdon.
- Paragraph 2.8: Social Facilities: this does not include mention of the importance of public houses as social facilities and as the focal point for communities and there needs to be strategy for their survival.
- Mention is made of the increasing number of people aged over 55 and in this regard consideration should be given to restricting permission for removal/ conversion of bungalows.
- Page 52, Point 5.7 states that "Abingdon-on-Thames is our largest settlement: it has the largest range of services and facilities, a good

employment base, excellent public transport links to Oxford and beyond, and it has the highest affordable housing across the Vale.” This is too generic and not accurate as not all the town benefits uniformly. In addition many of the employment opportunities in the town are relatively low paid.

1.4 Standards of accommodation and design There should be a general policy requiring minimum standards for accommodation, such as size of rooms, in the same way that there are already such standards in relation to social housing. Members have noticed that some planning applications have made provision for dwellings which are very small, with tiny rooms and cramped amenities. It is understood that social landlords have minimum standards for dwellings and that dwellings proposed in some of the planning applications which the Council have considered would not meet these standards. The Council believes that this is wrong and that the Local Plan should specify standards for dwellings so that they provide acceptable living accommodation for those who are going to live in the dwellings. It is acknowledged this may be more relevant for inclusion in the Design Guide; it is nonetheless mentioned here as the Council believes that this is important.

All rooflines should be built to be in keeping with the surrounding area. For example, where an attic extension is built this should be constructed within structure of the existing building so that the roofline remains consistent with surrounding buildings.

1.5 Parking in new housing developments Adequate provision needs to be made in developments to reflect the fact that households have more vehicles than ever before, with young people staying with the parents for longer and more work vans are being taken home by employees. Unless adequate provision is made there will be increasing parking problems. Car parking spaces, garages and driveways now need to be wider than was previously the standard; cars are larger these days, and spaces need to be available for people with disabilities, children etc. Again it is acknowledged this may be more relevant for inclusion in the Design Guide; it is nonetheless mentioned here as the Council believes that this is important.

1.6 Meeting the needs of an aging population Section 6 of the Plan- District Wide policies – refers to accommodating the current and future needs of the ageing population. At page 98 the policy, at (i), is that “all new homes designed for older people shall be built to current Lifetime Homes standards as a minimum.” However the Council believes that all houses should be built and equipped for life in order to avoid people needing to move then they develop mobility problems. Consequently, as well as bicycle shelters, scooter shelters should also be provided, along with outside charging points. People should be able to stay independent as long as possible.

1.7 Green areas - All new housing sites should have green leisure areas which need to be identified and safeguarded.

2. Infrastructure

The Council believes that it is important that prior to any housing development taking place there should be full agreement on improvements to the infrastructure of the town. New housing development places additional burdens on an already overstretched infrastructure and the Council believes that it is important that if commitments are made to improve the infrastructure that these improvements should either be undertaken ahead of or at the same time as the housing development itself, depending upon on the nature of the infrastructure to be improved. The Council has identified the following concerns in relation to infrastructure:

2.1.1 Traffic and Highways - Traffic congestion is already a major problem throughout Abingdon. The proposed developments would generate additional traffic which would increase the pressure on the peripheral road. Residents already face delays in leaving their houses each morning due to congestion on the roads and measures need to be put in place in order to ensure that such congestion not only does not get worse, but is eased. It has been suggested that improvements on Dunmore Road and Twelve Acre Drive could include widening the carriageways and improving the capacity of the roundabouts. Moreover, there is also a need for improvements should these housing sites be approved. There is a need to undertake works on the Lodge Hill junction on the A34 to increase the capacity of that junction, through the provision of a diamond interchange as referred to at paragraph 5.37 (page 60). Looking in the other direction, it should be acknowledged that there is likelihood that traffic going into Abingdon town centre could also increase and measures need to be put in place to ensure that air quality is not compromised. Investment needs to take place in relation to public transport in this area with improved bus services along the Copenhagen Drive and Dunmore Road in order to take people both into Oxford and also Abingdon town centre. This would decrease the reliance on the use of private vehicles.

2.1.2 Transport – the road network Page 60 – Transport – refers to the A34 & Drayton Road. As well as being a key route in to the town, the Drayton Road is also a diversion route when there are problems on the A34, as are many other roads in the town. The infrastructure is not adequate for this and requires improvement. More generally, page 108 refers to “Supporting sustainable transport and accessibility.” It needs to be ensured that diversion routes are of a standard which can cope with the demands being placed on them. An example of the issues regarding the need for adequate diversion routes were the problems encountered when the Bagley Wood road collapsed.

2.1.3 Dunmore Road: the alterations recently made to the Dunmore Roundabout need reviewing.

2.1.4 Core Policy 12: Safeguarding of Land for Strategic Highway Improvements. The intention on pages 60 and 61 to safeguard land for a South Abingdon-on-Thames Bypass linking the A415 to the west and South east of the town, including a new River Thames crossing as well as a Diamond interchange at Lodge Hill is welcomed. It is also considered important that land be safeguarded for an Eastern relief road.

2.1.5 Sustainable transport The Local Plan is looking forward to the period to 2031 and we should aim to have electric public transport plus adequate re-charging points within the life of this plan. Solar pavements (examples of which may be found in the Netherlands) should also be considered.

2.1.6 Bus Routes - Page 26 refers to “Supporting sustainable transport and accessibility” and states that there are very good bus services. It should be remembered that not all areas of the town have good bus services e.g. there is only one bus an hour from South Abingdon to Oxford; and the Wildmoor area has no bus service except for that serving the College and the local town service during the day.

2.1.7 Facilities for those who are less mobile Page 57 refers to Core Policy 10: Abbey Shopping Centre and the Charter. Mention is made of the need to improve facilities for pedestrians and cyclists. Policy should also address the improvements required by those less mobile for instance access for disability scooters /mobility aids, dropped kerbs and even, flat surfaces.

2.1.8 Core Policy 35: Promoting Public Transport, Cycling and Walking. Page 111 refers to this core policy but there is a need to ensure that routes can easily be used by buggies / wheelchairs etc.

2.1.9 Schools – There is already great pressure on school places in Abingdon, particularly in relation to the primary schools in the north of the town. The two developments which would bring an additional 1,000 dwellings into the town would mean that this pressure would increase. The Council has taken a look at existing primary school provision in this area and has concluded that the town would need at least one additional primary school within one of the new developments in order to accommodate the additional children who would need to attend such schools. Whilst the situation in relation to secondary schools is not as acute, the Council would also wish due consideration to be given to the impact of the proposal on housing on this part of the sector and funds to be made available to ameliorate that impact.

2.10 Education Page 104 refers to Further and higher education provision yet Abingdon & Witney College is not mentioned at all. It should also be noted that there are a number of public schools with a high percentage of

young people being brought in to the town for education and this should be mentioned in the Plan.

2.11 Health care – The proposed developments would place additional pressure on health care in the town. In particular, there is a need for additional dental services and this should be a matter which is considered when infrastructure is being looked at.

2.12 Other facilities - Proper provision also needs to be made for community facilities, play areas, open spaces, and shops.

2.13 Drainage and flooding issues – The Council is concerned that the proposed new housing could have a detrimental impact on drainage and flooding. At present, both the proposed major housing sites are green fields and accommodate a certain amount of rainfall. However, when the land is at capacity and can take no more rain, then the water drains away from this land causing localised flooding. In addition the River Stert flows adjacent to eastern edge of the proposed North-West Abingdon site and building in this area could well increase the rate of flow into the River Stert. The Stert already causes problems at times with flooding in the Farm Road area and always has the potential for flooding downstream towards the town centre. Development of this land would mean that a proper drainage and flood alleviation scheme for this area would be essential.

More generally there is need to address flooding issues and also re-use water e.g. through the use of balancing ponds.

2.14 Cemetery – In the near future there will be a need to identify and safeguard land in Abingdon for a new cemetery and the Town looks towards the District Council to help in this regard, through the strategic planning process. The Council is disappointed that the Local Plan process has yet to address this issue.

It should be appreciated that identifying such a site is difficult for a combination of reasons. The site needs to be physically suitable in terms of its location, topography, drainage etc. In addition, where land may be earmarked for housing either now or in the future, this has the effect of making the land prohibitively expensive for use as a cemetery. The proposed development sites will have a double effect on the Council and its search for a new site. It is understood that a new cemetery would be currently classified as permitted development within the Green Belt. To date, landowners have been reluctant to consider use of land as a cemetery, in the hope that the land could obtain permission for housing one day. The potential for housing development to be allowed in the Green

Belt will increase the cost of land now and in the future and could therefore effectively rule out large areas as potential cemetery sites. In addition, proposed developments themselves will place even more pressure on burial spaces in Abingdon. Consequently the Council would urge that provision be made within the north-west Abingdon development for a new cemetery, based on the triangle of land to the west of the Wootton Road (as shown on page 7 of the appendix).

2.15 Core **policy 7 – Providing Supporting Infrastructure and Services.** The Council supports this Policy, detailed on page 46, and emphasises that strict legal agreements backed up by robust procedures should be in place to ensure that excellent infrastructure is provided for any new developments.

3. Building in the Oxford Green Belt

3.1 There is a need to review the whole of the green belt, rather than the partial review as set out in the plan or a review targeting the southern part of the Green Belt.

3.2 It is noted that both of the sites identified for housing, in North and North-West Abingdon, are within the Oxford Green Belt. The Green Belt has been in place for many years and the Council considers it important to have a Green Belt which enables there to be a proper separation between Abingdon and Oxford and the villages in between. The Council notes that within the consultation draft the District Council has concluded that developing these sites would not have a significant impact on the Green Belt.

3.3 The Town Council is not opposed to reviewing the Green Belt and believes that regular review is important. However, the Council believes that if the Green Belt is going to be reviewed and development is proposed to take place, then the whole of the Oxford Green Belt should be subject to one comprehensive review, at the same time, and that there should be joint working between all the Councils in order to deliver this review and thus ensure that an holistic approach is taken to the need for, status, protection and definition of the Oxford Green Belt.

3.4 Whilst the consultation does not make proposals for housing development to the south and west of the town, Members feel that consideration should be given to defining and establishing a Green Belt around Abingdon in order to maintain the existing and essential separation between Abingdon and the surrounding villages such as Drayton and Marcham.

4. Community infrastructure levy

4.1 Housing must be supported by robust infrastructure and in this regard the revenue generated by the Community Infrastructure Levy (CIL) is important. The proposed new housing in the north and north-west of the town would look towards Abingdon for services and facilities and be functionally part of the town and also make use of the town's services.

4.2 However, the sites of the proposed developments are within adjoining parishes. Consequently, the Community Infrastructure Levy (CIL) which would pertain to these new dwellings would accrue to those parishes despite the developments being functionally part of Abingdon, which would require infrastructure improvements in order to support the proposed developments.

4.3 The Council considers that should these new dwellings be approved then there should be a parish boundary review to bring these new developments to within Abingdon, and that at the same time such a review should look at the town's relationship with the parish of Shippon. The Council recognises that the parish boundaries are not a matter for the Local Plan as such; however, these are relevant to the future development of the town and consequently should be raised at this juncture.

5. Use of resources and their impact

5.1 Page 27 – Protecting Water resources

Thames Water does not have an accurate map of sewerage system in Abingdon and work needs to take place to get these up to date.

5.2 Page 122 – Efficient Use of Natural Resources. The Council is concerned about air pollution. A more robust approach needs to be taken to air quality issues with a review of current arrangements, including the area covered by the Air Quality Management Area. The Council believes that enhanced monitoring is needed, especially in the context of the proposals for more housing compounded by the lack of a second bridge crossing. Central Abingdon is an Air Quality Management Area but air quality not just an issue in the centre of town, problems go up Oxford Road and Marcham Road (by Ock Street/ Spring Road) and monitoring needs to take place in these areas. It is also noted that there is more traffic already coming down the Wootton Road and this may well increase in the future, creating more “bottlenecks,” and concerns about pollution there too. The point that all public transport should be power electrically by the end of the Plan period (2031) was reiterated and that this required an adequate infrastructure of charging points to support it.

5.3 Efficient energy There should also be a requirement in policy for new homes to be designed for maximum energy efficiency including more use of heat pumps and solar energy. The relevant European standard should be looked at.

6. Other matters

6.1 Page 25 – Promoting Tourism: The town needs budget hotels too as well as “high end” hotels.

6.2 Core Policy 10, Abbey Shopping centre and the Charter: on page 57 this currently reads “which supports the redevelopment of this area to enhance the retail offer within the town.” This would more appropriately read “which supports the redevelopment of this area to enhance the retail and leisure facility offer within the town.”

6.3 Existing Strategic Employment sites These are detailed at Appendix B page 60. The question is raised as to whether the centre of Abingdon should also be classed as a strategic and designated employment site? Perhaps it should be defined as a “commercial retail site”.

7 General comments

7.1 Page 9: Executive Summary. It would be helpful for the context of the Plan if the map of the Vale showed the settlements in the adjoining district areas.

7.2 Page 17 – the website link for note12 does not exist.

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18th December 2014.