



# ENGLISH HERITAGE

## SOUTH EAST

Mr David Perrow  
Drayton (Abingdon) Parish Clerk  
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Oxon, OX14 3TB

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Your ref:  
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11<sup>th</sup> February 2014

Dear Mr Perrow,

### **Drayton2020 Neighbourhood Plan – Statutory Consultation**

Thank you for your e-mail of 10<sup>th</sup> January advising English Heritage of the consultation on the Drayton2020 Neighbourhood Plan.

We welcome the recognition of the heritage interest of the parish in paragraph 28 but we would welcome greater detail and reflection of the significance of the historic environment, particularly as this information is not to be found in the Sustainability Appraisal Scoping Report on which we commented in December last year. We would like to see more information about the Conservation Area and listed buildings in the town and their significance, in addition to the two Scheduled Monuments described in the Scoping Report. There should also be reference to non-designated features of local interest - is there a list of locally important buildings and features ?

Further information on designated assets is available from The National Heritage List for England, on local listing from the English Heritage guide (our letter on the Scoping Report included an appendix with links to these documents) and on non-designated heritage assets from the Historic Environment Record (HER) maintained by Oxfordshire County Council.

There are a number of references to the character of the village in the Plan e.g. in paragraphs 39 and 47. We welcome and support the aims to develop an environment that builds on and enhances the distinctive character of the village; to weave the historical background of the village into any new development to retain character; to maintain and enhance the character of the village through developing and utilising a Village Building Code; and to emphasise the village's historical roots to strengthen its identity.

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We also welcome and support the reference to the village's historical character and the requirement for any development in or adjacent to the Conservation Area to look to conserve and enhance it in paragraph 50. We also welcome and support Policies P-LF3, P-LF4, P-S1, P-H10 (which appears to largely duplicate P-LF4) and P-H11, although we would prefer to see a specific policy for the conservation and enhancement of the historic environment and heritage assets in the parish.

However, we are not aware of any studies or exercises to investigate, understand and explain the historical or other character of the village. When commenting on the Sustainability Appraisal Scoping Report in December last year, we noted that there was no description of the character of the village and no references to any characterisation exercises of the village as a whole or of the Conservation Area (in fact, it is our understanding that the Conservation Area was designated in 1969 but that there is no Character Appraisal or Management Plan).

A characterisation study can help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.

Without such a detailed understanding of the distinctive character of Drayton, what its defining characteristics are, it will be difficult to ensure that new development retains (or reinforces) historical character and that that character is generally maintained and enhanced. It will also be difficult to ensure that sites for new development are the most appropriate in terms of respecting the historic character of the village, which we note was one of the most important site selection criteria voted for by local residents.

As regards the potential development sites identified in the Plan, we have the following comments. According to our records, Site 1 has no designated heritage assets, but the Ordnance Survey map shows tumuli in the northern half. The fact that these are not scheduled monuments does not necessarily mean that they are not of national significance. The significance of these tumuli should be confirmed with Oxfordshire County Archaeologist before this site is considered appropriate for development. Indeed the County Archaeologist and the District Council's Conservation Adviser should be consulted on all the potential development sites.

Site 2 is within the Drayton Conservation Area and sites 3 and 4 adjoin the Conservation Area. Policy HE1 of the Vale of White Horse Local Plan 2011 states that development will only be permitted on open spaces in Conservation Areas where it can be shown that these areas do not make a positive contribution to the Conservation Area's special interest including its relationship with its landscape setting or to views within, into, or out from the Conservation Area which would be lost or damaged were the development to be permitted.

We recognise that Policies P-LF4 and P-H10 of the Neighbourhood Plan are intended to ensure that any development within or adjacent to the Conservation Area conserves or enhances its character and appearance and its setting.

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However, without a detailed character appraisal of the Conservation Area, can there be a proper understanding of the contribution of sites 2, 3 and 4 to the special interest of the Conservation Area and be confident that development on these sites would not harm that special interest/character ? If not, there is the potential for both internal conflict within the Plan and with Local Plan Policy HE1.

We also note that site 3 is also adjacent to the parish burial ground and the historic St Peter's Church, the appearance and integrity of which are also protected by Policy P-H10, but again, has there been any analysis of the importance of the setting of these ?

Our records show no designated heritage assets on or adjacent to sites 5, 6, 7 and 8. However, the Oxfordshire Historic Environment Record should be consulted for any records of non-designated assets. As noted above, the Oxfordshire County Archaeologist should also be consulted.

In summary, therefore, English Heritage considers that further work is necessary to understand the character of Drayton in order to be confident that the development of any of the sites identified for potential development would not be harmful to the special interest of the Conservation Area or the character of the village as a whole. Even if development on these sites was acceptable, a greater understanding of their contribution to the village might indicate what form of development would be preferable.

There were links in the appendix to our letter on the Sustainability Scoping Report to "Placecheck", "Building in Context", the "Oxford Character Assessment Toolkit" and "Understanding Place", all of which contain further information on local characterisation . We reiterate our offer that we would also be pleased to discuss characterisation with you and possibly help prepare a characterisation workshop.

We hope these comments are helpful. Please contact us if you have any queries. Thank you again for consulting English Heritage on your Neighbourhood Plan.

Yours faithfully,



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