

Environment & Economy  
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Sue Scane – Director for Environment & Economy

David Perrow  
Clerk – Drayton Parish Council

Date: 20 February 2013

Dear David,

**Re: Drayton Neighbourhood Plan**

Thank you for your email dated 10 January inviting comments on Drayton Parish Council's draft Neighbourhood Plan for Drayton.

We believe that communities should have the freedom to develop their own plans providing they conform to the relevant local plan and they follow the process of public engagement and examination which the district council helps to administer.

Therefore we are keen not to unnecessarily interfere in the development of Neighbourhood Plans. However we do need to ensure the plans do not put unrealistic service or financial demands on the County Council. Hence it is important that the impacts of the developments proposed are mitigated and that any infrastructure requirements are fully funded by the developments individually or collectively.

We have the following comments or factual corrections to make:

**Contributions to Infrastructure**

Infrastructure requirements and aspirations identified need to be deliverable directly or indirectly through development. Other than existing developer contributions secured it is very unlikely funding over and above that secured through future developer contributions will be available.

The Plan must carefully consider what infrastructure it can deliver and thought must be given to the level of contributions that can reasonably be expected from the scale of development planned for Drayton.

**Drayton2020:** This point is noted. Drayton2020 will develop a S106 costed list to add to the next version of the Drayton NDP

We have the following specific comments to make related to county council infrastructure:

- Policies C-T7 (Cycle Ways) and C-T8 (Bus Service) seek to improve the cycle network and increase the frequency of bus services respectively. Whilst the county is supportive of these aspirations it is not able to commit resources to progress or fully fund these schemes. The plan therefore needs to articulate how it will ensure this

policy can be delivered or remove it. Not being able to deliver the policy and hence the plan would be contrary to Paragraph 7 of the National Planning Policy Framework (NPPF) which seeks to coordinate development requirements with provision of infrastructure.

**Drayton2020:** This point is noted. Drayton2020 will develop a S106 costed list to add to the next version of the Drayton NDP

- Policy P-H8 (Contributions) – The County Council will need to be included in any formal agreements when securing contributions from new development towards county owned infrastructure or services it is responsible for.

**Drayton2020:** This point is noted. S106 agreements are organised by VWHDC and OCC are normally consulted. Drayton has previously been excluded from these discussions but would expect to be included in any such negotiations with potential developers in future, alongside VWHDC and OCC.

- Policy P-H9 (Use of Contributions) - The list needs to include provision of school places for all ages as well as places for primary school children.

**Drayton2020:** This point is noted and this will be included in the next version of the Drayton NDP

## **Transport Strategy**

### *General comments*

- As developments sites are designed up in more detail it is possible that transport issues may arise that were not been able to be identified at this stage.
- Developer contributions are likely to be limited due to the likely small sizes of development.
- All development sites should seek to mitigate against the impact of increased car use on Drayton and Abingdon as parts of these are already very congested at peak times. Mitigation required should be through direct delivery in the first instance rather than a contribution.
- Recommend [www.oxfordshireliftshare.com](http://www.oxfordshireliftshare.com) for further information on car sharing.

**Drayton2020:** These points are noted and will be included in the next version of the Drayton NDP

### *Specific comments*

- Page 16: clarification on the Transport aims may be helpful e.g. It would be useful if the document clarified how it wanted to make it easier for residents to travel, explain how it is difficult at the moment and how this affects safety, accessibility, congestion.

**Drayton2020:** Noted. The Plan will be amended to make this clearer

- Page 24: The county council has concerns about the appropriateness of reducing the speed limit on the main road (B4017) through the village to 20mph. The level of traffic that uses this road makes this an important route for the movement of large numbers of vehicles. The need for the road to carry a high volume of traffic would also make it difficult to implement measures to make the 20mph limit self-enforcing and would need to rely on Thames Valley Police.

**Drayton2020:** OCC views on the 20mph are noted. However, Drayton residents feel strongly on this issue, as evidenced in the community questionnaire and at meetings

- Page 25: Traffic volume: promotion of the use of public transport and non-motorised transport is discussed but there is no policy relating to this. We recommend a policy is included.

**Drayton2020:** Noted. The Plan will be amended to cover this point

- Page 26: Possible cycle routes: funding is most likely achievable for cycle routes connected to employment sites within Science Vale UK e.g. Milton Park.

**Drayton2020:** Noted. Government funding is also available for cycle routes, and OCC is eligible, as the Highways Authority, to apply for this funding.

#### *HGVs and weight restriction*

Policy C-T6 looks to potentially implement HGV weight restrictions through the village along the High Street. It should be made clear that this can only be achieved for through traffic, admittance by HGVs for access must be retained, and this would include access to the County Council's Highway Depot located on Milton Rd. The county council already has preferred route policies in place which can be seen here: <https://www.oxfordshire.gov.uk/cms/content/lorry-routes>.

**Drayton2020:** Noted. The next version of the Plan will be changed to make this clear.

#### *Comments on Identified Housing Sites*

Any developer will have to provide a Transport Assessment which looks at access for vehicles and pedestrians. At present there are no obvious problems identified, provided thorough assessments are made and infrastructure to mitigate is provided. Improvements to pedestrian and cycle infrastructure will be sought by the county council where necessary.

**Drayton2020:** Noted. This point will be included in the updated version of the Plan

#### Site 1:

- The site is located on the northern fringe of the village but walking and cycling distances are not unreasonable.
- Walking links are satisfactory as there is a pavement from the site to the centre of Drayton.
- Cyclists would have to cycle on-road.

**Drayton2020:** Points noted.

#### Site 2:

- The county provided pre-application advice for this site in February 2013. It was identified that a suitable access could be achieved and it would be likely that a safe crossing area in the vicinity of the access towards the village centre would be needed.
- Good walking and cycling links as the site is central to Drayton and near to local shops.

**Drayton2020:** Points noted.

#### Site 3:

- This site is further away from the village centre and is therefore less sustainable than others in terms of ability to make local, non-car journeys.

**Drayton2020:** Points noted.

#### Sites 4, 5, and 6:

- These look reasonable in terms of walking and cycling: they are not too far from the local shops and there are facilities for pedestrians.

**Drayton2020:** Points noted.

#### Site 7:

- This site is the least favourable from a transport point of view due to its location further out of Drayton and the distance that people would have to walk or cycle to use facilities / shops in the centre of the village.

**Drayton2020:** Points noted.

Site 8:

- Walking and cycling distances are fairly good due to the location of this site reasonably near to the centre of the village and the presence of facilities for pedestrians.

**Drayton2020:** Points noted.

## **Countryside**

Policies C-T7 (Cycleways), C-WP 10 (upgrade PRoWs) and C-WP 11 (Parish Pathway) all meet the aims of the LTP and the Rights of Way Improvement Plan.

The community are encouraged to work with the developers and local landowners as appropriate to try and seek agreement for the proposed new routes and also to work with the Countryside Access Team to ensure that any proposed upgrades to existing public rights of way are safe and appropriate for all users, especially surfaces in relation to equestrians. The improvements should also not create an unreasonable additional maintenance liability. The Countryside Access Team does not have its own funds for improvements but often seek contributions for this type of work from larger developments. However there is nothing to stop the community from undertaking their own negotiations or from raising funds through their parish precept or allocating any monies given to them through the Community Infrastructure Levy or similar schemes. The community may also wish to seek additional funding for works that have been agreed by the landowner and this team. A good source of funding is the Trust for Oxfordshire's Environment ([www.trustforoxfordshire.org.uk](http://www.trustforoxfordshire.org.uk)) as there is a specific access grant stream available, and other sources of funding may be available including the National Lottery and local charitable funds.

**Drayton2020:** These points are noted. Drayton2020 is in discussion with developers on this issue and OCC Countryside Services (Mark Sumner) has visited Drayton to look at plans to upgrade footpaths/bridleways.

### *Crossing of the B4017*

There is a wide network of rights of way west of the B4017 with many offering a multi-user surface; the rights of way often follow surfaced farm tracks (tarmac or stone) as well as being the most rural routes in the south of the county. With Drayton getting bigger and the road becoming busier it might be useful if some focus could be put on the crossing of the B4017 by some means, probably a Pegasus crossing to link the quite extensive bridleway network on both sides of the B4017.

**Drayton2020:** This issue is fundamental to the Drayton2020 NDP and is already included in the Plan. Various methods of traffic calming (including 20mph limit commented on above), are being considered. Extra crossings (previously removed by OCC from the B4017) may need to be re-instated.

## **Archaeology**

English Heritage has previously advised that the following policy should be included within Neighbourhood plans.

### *Policy HE1*

The Historic Environment: The parish's designated historic heritage assets and their settings, both above and below ground including listed buildings, scheduled monuments and conservation areas will be conserved and enhanced for their historic significance and their important contribution to local distinctiveness, character and sense of place.

Proposals for development that affect non-designated historic assets will be considered taking account of the scale of any harm or loss and the significance of the heritage asset as set out in the National Planning Policy Framework (NPPF 2012) .

**Drayton2020: Noted. This will be included in the updated Plan**

### **Waste**

The county supports policy P-H12 which encourages adequate facilities to be provided in housing developments for the storage of waste recycling bins.

**Drayton2020: Noted. This will be included in the updated Plan**

Housing sites 5 and 7 are relatively near a former landfill site at the golf course. The proposed development sites are no closer than existing houses in the village, but advice from the Environment Agency should be sought to confirm there are no issues with landfill gas in relation to the proposed housing sites if this has not been done already.

**Drayton2020: Noted. Landowners/potential developers of sites near the Golf Course will be so advised.**

If you have any questions on our response to this consultation, please contact me.

Yours sincerely,

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CC – Katherine Macdonald – Vale of White Horse District Council