

**DRAYTON NEIGHBOURHOOD DEVELOPMENT PLAN
2014-2029
Pre-Submission Consultation Copy**

Consultation response from Daniel Scharf MA MRTPI

Introduction

I have a first degree in town and country planning and a Masters in Environmental Policy and Society. For 13 years I was a planner with the Vale of White Horse District Council, since when I have been planning adviser to a law firm working across the country. I have been a tutor in town & country planning at Oxford University Department of Continuing Education and have trained solicitors within and outside my own firm. I have also written about planning in the Journal of Planning & Environment Law and maintain a blog on planning matters. I carry out consultancy under the trading name PFT planning and have also worked for and advise voluntary organisations.

I moved into Drayton in 1975 and joined the Parish Council in 2004 during most of which time I was its chairman. I was chairman of both the council and the planning committee when it was resolved to prepare a neighbourhood plan. I was a substitute member of the steering group (while another parish councillor was abroad) and attended all the meetings of the Sustainability Working Group, assisting in the preparation of both the Housing Policy Guidance adopted by the parish council in December 2012 and its response to the Draft Strategic Local Plan.

Having carefully considered the first draft of the neighbourhood plan and chaired the planning committee and parish council as part of the process of initial "adoption", it became clear that my views on the issue of "sustainable development" were not sufficiently close to those held by the members of the parish council who were involved in the preparation of the NDP. I also had serious reservations as to how the NDP was going to meet the "basic conditions" without substantial amendments which members of the parish council appeared reluctant to consider. In the circumstances it seems sensible for me to resign from my position on the parish council and to make what I hope our constructive comments in response to this amended consultation draft.

Preliminary comments

Having read a number of inspectors report on NDPs it seemed sensible to summarise these in a way that could help those involved in drafting the plan for Drayton and the note which was circulated is attached at DRS1. The letters of 16 December 2013 written to the Vale of White Horse and 31 December 2013 written to Drayton Parish Council are appendices DRS2 and 3. These representations are being prepared having received a response from the VWHDC. An example of a NDP phasing policy is included at DRS4

The following comments are based on a consideration of what amendments to the plan would enable it to meet the basic conditions, and how the policies could provide the necessary guidance to understand whether planning applications would or would not be in accordance with the development plan in applying s38(6) of the Act.

The basic conditions of greatest concern are:-

1. Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan)
4. The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.

There are also basic conditions relating to development in conservation areas and on conformity to the local plan. Comments on the possible development at Manor Farm clearly engages the former. There is an absence of an up-to-date local plan to conform with. However, the Vale of White Horse DC is committed, where possible, to learn from neighbourhood plans so that in preparing its local plan there should be no material conflict. Whether a NDP can be adopted in advance of a local plan is currently subject to a High Court challenge.

As well as following progress of the neighbourhood plans I also examine appeal decisions, mostly those relating to large-scale residential element. It is very disturbing the extent to which different inspectors (and, following recovery, the Secretary of State) adopt different positions in respect of sustainable development. I am in correspondence with both DCLG and PINS on the matter of how the 'golden thread' of sustainable development and the presumption could be applied more consistently in both plan making and decision taking.

The Inspector's Report on the Slaugham NDP contained an interesting comment on the contents of an NDP (para 4.6). "Neighbourhood plans often contain projects or aspirational policies that signal the community's priorities for the future of their local area. However, the neighbourhood plan should only contain policies relating to development and use of land. Therefore where a policy is considered to fall outside of this scope I have recommended that the policy be moved to a different section or appendix of the Plan. This is because matters or projects of this nature can continue to be included within the general text as they represent proposals the community seeks to achieve, but they should be deleted as policies. Once moved into a different section or appendix of the Plan, this should be clearly differentiated from the planning policies section of the Plan."

The Inspector was also unsure about the evidence base for the proposed housing allocations saying that "... it would be useful for the Parish to make an objective assessment of the level of residential development it needs as

part of the neighbourhood planning process... it is not clear to me how the figure of 130 has been derived. (DSNDP para 9.11)

“Even though the Plan could be monitored and reviewed, it appears that the target figure is not derived from any robust evidence base and has not informed the process of site selection. Rather it seems that sites were identified and then the figures derived from their capacity with the onus on ownership and control of the sites to identify them in the first place.” This might bear similarities to the approach being taken in Drayton?

“Whilst I understand that ownership and control is one way to ensure that Affordable housing is delivered, it is not the only way this can be achieved. For instance affordable housing could have been developed through a rural exception site route. In any case rather than having a figure constrained by a preference for certain sites to come forward, the overall target should have been unconstrained in the first instance. Whilst this is a challenge at neighbourhood level as, for example household projections are difficult to translate to the very local level and I accept that any assessment should be proportionate, it is not clear what steps have been taken. It is for these reasons that I do not consider the target figure or the site allocations to be sufficiently robust.” (DSNDP para 9.31) This is a difficult job without the SMA and considerable help from the VWHDC. It might mean that the Drayton NDP might have to slow down. However, the NDP should have a clear reasoning why the housing need identified in the needs survey should be met on particular identified sites is preferable to exception sites that tend to be less well associated with the village.

Finally the Inspector thought that the DSNDP should adopt the definition of windfall sites in the Framework to ensure consistency with national policy (SDSNDP 9.35)

As background to these comments I would draw attention to the most cogently argued appeal decision in respect of sustainable development (see APP/N2345/A/12/2169598 through the Planning Portal). I have emphasised those points that I would expect to see reflected in this draft neighbourhood plan were it to stand a reasonable prospect of satisfying basic conditions 1 and 4. The appeal inspector provided some insights into how the planning system had adjusted to the “presumption in favour of sustainable development”. He says, “*Although the sustainability accreditation of the proposed element was often mentioned...there is little detail or objective evidence. This is perhaps surprising and suggests that sustainability, in the wider context, is misunderstood.*” He found the location to be potentially sustainable but, “*60...on the other hand, if we seek a Bruntland scenario [the definition referred to in the NPPF], whereby today's development would not impose environmental costs on future generations, we are a considerable way from achieving that. There was certainly no expectation that the development would' consume its own smoke'.*” This conclusion was reached despite the fact that the development was proposing Code for Sustainable Homes Level 4 - a standard higher than would have been required by the Building

Regulations. He referred to an inadequate travel plan, and the absence of proposals to generate energy on the site or for sustainable drainage.

He found “61... the saving grace is that this is an outline scheme and one that could be up-rated as part of the submission of details, so long as appropriate conditions are attached at this stage. Such matters as design, layout and even the *orientation of buildings* are crucial in this context.”

Comments on the draft Plan

The following comments use the headings and numbering from the consultation draft and mostly refer to matters where the application of the proposals and policies would not ensure that development in the village would meet the presumption in the NPP.

Foreword – ‘opportunity to improve Drayton's facilities **to make it a sustainable location to live**’. This is an absolutely fundamental point which I fully support. Contrary to the view promulgated by the Vale of White Horse District Council, Drayton is not a sustainable location (primarily due to the high level of car dependency acknowledged by the District Council). This must be clearly stated in the Plan and it would be through new housing developments that the village could be made a sustainable location. This will require the careful and imaginative use of planning obligations.

‘...meeting the needs of the wider area... ‘ This principle should also be supported and the NDP should recognise that most of the new housing is likely to be occupied by people not currently resident within the village, although the extent to which new housing is likely to meet local needs would be substantially increased through **phasing the rate of new development**. The plan should acknowledge that other developments would also have wide appeal, e.g. self building and smallholding.

‘...In all this, Drayton2020 had been greatly aided by design concepts from the Adams Habermehl Environmental Design Partnership.’ It is unclear how or why those responsible for the preparation of a development plan have found it necessary to include very much in the way of design advice (or detailed discussions with landowners and developers. The effect of this might have depleted the resources that could have been given to considering the matters of principle and feasibility on which a credible NDP would rely. There is also a danger that these detailed discussions might have prejudiced the consideration of matters of principle i.e. whether sites were fundamentally acceptable or as in the Slaugham case whether more should be done about housing need before looking at sites. It is understood that negotiations with potential developers might have delayed applications – but any such applications would have (and still should) be preceded by public consultation and meetings where a wide section of the public will be involved. The success in securing developer contributions (hall, playing fields, bus services, school, smallholdings etc. is likely to depend on feasibility studies and costings.

Introduction 5. This should mention that even in the Housing Standards Review there is no suggestion that the 2016 target for zero carbon homes is to be changed. Any development permitted from 2014 onwards (planning permissions last for 3 years) could be required to meet that standard and 'consume their own smoke'.

Intro 13 -14. During the latter part of 2012 the job was given to all the working groups to consider the content of an interim position on housing development in the village. What became the Housing Policy Guidance approved by the parish council in December 2013 and submitted to the Vale of White Horse District Council, was given careful consideration by at least the Sustainability Working Group that ensured the policies would address sustainability issues, although the Drayton2020 Steering Group did not endorse the final version. This remains the reference for the parish council in its response to planning consultations.

Intro 18, I attended a number of meetings of the Steering Group with the purpose of updating it on matters arising from the Abingdon, Drayton Road appeal, planning decisions being made by the district council and on the increasingly serious matter of climate change and carbon emissions. I also regularly reported on the progress of other neighbourhood development plans.

Intro 33. The figures relating to under-occupancy and the indication that over the last 10 years the level under occupancy has been increasing should be fundamental to not only the NDP but also the local plans being produced by the District Council.

SWOT: an important 'opportunity' of housing growth is to re-balance the size of household and housing. 'Weaknesses' should include the car dependency of the village location, the poor bus services and the considerable distance from north to south (just as divisive as the Abingdon/Steventon Roads). The 'threat' from development that has been permitted in nearby town/parishes should be qualified as one of traffic growth and inadequate transport infrastructure.

47. (1st bullet) Until much more detailed design work and costings the possible village centre should be described as a "new open space" rather than village green. This is also important because of the very rural character of this space within the conservation area but should be preserved and enhanced.

(2nd bullet) cohesion and viability of village facilities would be more likely to be achieved by the use of land close to the centre of the village rather than on its extremities (e.g. Steventon Road, Barrow Road and the road to Sutton Courtenay)

Apart from enhancing landscaping/biodiversity the other 'aims' are contestable and not very helpful. In particular, a building code in a village of

such diverse building styles as Drayton would lack credibility (a matter for the Inspector) and serve no useful purpose.

Generally, the formatting includes aims, key ideas, proposals and policies that overlap and confuse. What is the difference between an aim and an idea? Why are some the same and some different?

LF Key Ideas: the uncertainty about having a new building and the nature of the open space would suggest that P-LF 1 should not describe this as a “focal point” when the role might be much less important. There should be no reference to “village green” or to “building code”

P-LF1 should simply refer to opening up views of the land from the west. Much more needs to be known about what is intended by a “village green” (eg it could be a space remaining in EoP ownership. It should not be in the same policy as the “community centre” about which much more also needs to be understood about the potential uses.

49 16 houses remain with permission. More were dismissed and the reasons should/must be included in this assessment as they will be a material consideration in considering the plan and any subsequent application. Appeal decision is available online and an assessment is at DRS4.

P-LF2: This confuses the built-up area and ribbon development. The policy should read...Development should be limited to land within the existing built up area of the village except for the sites identified in Policy... as being suitable for the growth of the village, or for housing or buildings to enhance the provision of local food in accordance with Policy...

50. I think that the NDP exaggerates the quality of the existing built-environment. “preserve or enhance” as per Listed Buildings Act 1990 and not conserve (as per NPPF).

P-LF3 the Building Code now seems to be three documents? Those referred to in the policy are fine but why bother with the village version.

54. Why is the NDP using *Greenery* when *Landscaping* is in common use?

P-LF7 there is no level of planting specified in DC6.

Fig 4 shows the planting along the Manor Farm Abingdon Road frontage that is being proposed to be removed.(?)

56. This should say that residential development will not be allowed where affected by noise from the A34. This is not a matter for a Community policy.

57. should include the reduction of the speed limit (as in Botley) stating the benefits of lower engine and tyre noise, more fuel efficiency, less congestion and fewer RTAs (that cause chaos when traffic diverted through in the village.

C-T3 is a contradiction in terms. Traffic reduction is a matter for the planning process and should be a NDP and not a Community policy. It should be a matter for Travel Plans to demonstrate how this will be done and not to be 'positively encouraged' that has no means of measuring compliance (ie S38(6)).

C-T4 what exactly is wrong with the current parking situation and what ideas have there been to improve them?

63. should mention the need for all development to contribute to the improvement of public transport. It should also describe the way that car clubs reduce car ownership and use. (possibly the only known way). Otherwise the reference to 'sustainability goals' is meaningless. Enhancing cycle ways should also be said to be the subject of developer contributions – but work required on expense. 40 people (see Village Survey on car sharing) are enough to support a car club. ORCC have details of rural car clubs and potential for EasyCar. Travel plans should also provide free travel passes. Barrow Road could finance RTI and shelter at the bus stop.

C-T8 should be the explanatory text for a policy requiring developer contributions

Why is Work (ie employment) bracketed with Play (ie recreation) when these issues have completely different land use implications?

66. or re-building

67 this paragraph should have a complete the list of recreational buildings: church, church hall, day centre, football pavilion, village hall, golf clubhouse, school hall. The football pitch is on registered common land (so use always available to non-footballers). The size is a league matter not the FA. What does no dedicated use mean?

68. Is there any reasonable prospect of the village centre being more that for the pre-school? And if so this is so far from what the village survey suggested that there is no real need to hang onto the idea?

71/72. There can be no 'minimum' before the feasibility work. The uncertainty expressed here about the new 'village centre' should appear before policy P-LF1

P-WP1 Does not specify a location? Does not explain why a community building is required that would compete with a revamped or re-built village hall, the day centre (and football pavilion). Apparently the School would like the pre-school to stay on their site. The village survey identified support for a 'community centre' that now seems unfeasible, and not a pre-school.

P-WP2 might involve re-building

P-WP5 these facilities are very unlikely to be provided on development sites. This should be a policy saying that new residential development will not be permitted unless it contributes through providing land or the necessary finance to the enhancement of recreational facilities (the list need not be in the policy itself). Para 69 had noted the lack of previous contributions (ie from small developments) so why now apply a 10 dwelling lower limit?

P-WP6 Maintenance of the Millennium Green – and more play areas need to be part of the costing of the Plan. This policy should be an aspiration requiring a proper management plan for the Millennium Green which would cover planting, maintenance and equipment, be subject to a separate consultation, and be properly funded.

C-WP7 Avoid “all efforts” (here and elsewhere) and consider “Opportunities will be sought to increase the biodiversity in and around the village possibly including nature reserves”

PLANNING POLICY P-WP8: BIODIVERSITY OFFSETTING

Avoid ‘encouragement’ . When biodiversity cannot be preserved or enhanced on a development site developers will be *required* to offset habitat loss or degradation by funding environmental improvements elsewhere in the Parish.

73. avoid ‘all efforts’ and use “look for opportunities” f

74.To the west of the village there exists an opportunity to work with the Wilts & Berks Canal Restoration Trust to create a well signposted circular walking trail utilising existing footpaths, bridleways and reinstated towpath linking the village with a number of features of the parish (Drayton copse, the canal and lock etc.).

75. To help the village become more sustainable it is proposed that applications to re-develop existing employment sites will be resisted (policy P-WP13 to be amended). Applications that would increase work opportunities in the village would be supported. Houses designed to accommodate ‘working–from-home’ will also be supported. (A policy is necessary for this to be a requirement). Opportunities will be sought to increase the jobs in the growing, processing and distribution of food. (See section of Farming and Food)

P-WP9 there might actually be very little that can be achieved off-site, but examples should include post-office, recreation ground/ village hall.

C-WP14 there could be an opportunity to use the open space, even if no building at Manor Farm. However, the Red Lion car park might be a better bet. The use of the car park for the school run should be checked with owner and mentioned in the Plan and its potential for a car wash?

A chapter on sustainability should refer to the ‘golden thread’ in the NPPF that applies to plan-making, and the ‘presumption in favour of sustainable development.’ The Climate Change Act requires reductions in carbon emissions of 80% by 2050 and the Fourth Carbon Budget of 50% by 2025.

There will also be a requirement in 2016 for all new dwellings to be zero carbon. These targets require reductions in housing, transport and agriculture sectors that are all matters dependent to some extent on the use and development of land, the basis of the NDP. It is a basic condition that the NDP "contribute to the achievement of sustainable development" and it is important that the policies and proposals of the Plan show how the economic, social and environmental components can complement and reinforce each other without unnecessary trade-offs between them.

77, enviable? What about 'resilient and enjoyable'?"

Using local building materials is not only illegal (e.g. EU regulations admit the use of Spanish slate) but very few can actually be sourced locally. Importantly, this cannot be the only policy included to meet the aim of reducing carbon!

83. It is the Climate Change Act and would suggest that this is part of the introduction to this chapter. The following list should not include local materials but should include promoting the growing, processing and distribution of local food (given that the food supply chain is responsible for between 30% (CCC estimate) and 50% (UNCTAD estimate) of carbon emissions)

P-S1 it is impossible to know whether a development is in accordance with a policy that is an "encouragement". In this case the policy is inappropriate as 'local' is imprecise and probably illegal.

85 the planting of gardens will not be a matter for the developer. Should "green roofs" be a requirement of new building?

CS-2 & 3 and surrounding text including comment on procurement should go into appendix. (See inspector's comments on Slaugham NDP)

91 d Meet the prescribed energy conservation and sustainability criteria set out in the VWHDC Local Plan with a presumption in favour of any new development that exceeds them; there should only be the "presumption in favour of sustainable development" and it would be appropriate for the NDP to interpret this in a way that is supported by evidence. The Committee on Climate Change has, "... *highlighted the need for a step change in the pace of emissions reductions ...[and] the crucial role for local authorities in meeting national carbon budgets, showing that emissions reductions without local action will be insufficient... Under the planning system, local authorities can prepare Local Development Plans which identify sites for specific land uses (e.g. new housing) and set out the criteria for approving planning applications. For example, a local authority can set energy efficiency standards for new homes that exceed current building regulations*" (*How local authorities can reduce emissions and manage climate risk* (May 2012). Committee on Climate Change) in the Fourth Carbon Budget the Committee on Climate Change has noted difficulties in securing the necessary carbon reductions in the housing sector (eg problems with solid wall insulation and heat pumps). There have

also been well-publicised problems with the Green Deal. This would suggest that the highest possible standards should be expected of all new building (the 2016 zero carbon target remains). It would be sensible to require an 'Energy Assessment' for new developments to be compared with the sustainability requirements appropriate at that time (ie in the period up to 2030).

e. Ensure appropriate measures are in place for the selection of sites for development to ensure they meet the needs of parishioners regarding maintaining a sense of community, also that where appropriate new builds are sited on land parcels offered for development by their landowners. Should be replaced by "this plan seeks to ensure that housing will not be permitted in the open countryside except on sites which are found to be acceptable in order to meet the objectively assessed demand for new housing within the area."

There should be a further paragraph referring to the objectives of addressing the unsustainable level of under occupancy within the village (eg about 75% of dwellings having one but more commonly two spare bedrooms)

92. Developments do not "reflect" but are "designed to meet" needs

93. 50 represents a very sizeable interest in cohousing.

If, as should be the case, new housing should be designed to re-balance the size of housing and households within the village. The village survey identified a demand for larger houses but a recent survey (Rightmove 2014 01 31) showed 10 dwellings with 4 bedrooms (or over), 7 with 3 bedrooms, 2 with 2 bedrooms and no one-bedroom units. This would suggest that the demand for larger houses could be met from existing stock and there is every reason to build smaller rather than larger houses to increase the supply to meet local needs of smaller households.

On the basis that self build or finish can represent a substantial discount on the cost of either renting or buying a dwelling, the NDP should quite properly identify this as a form of affordable housing required to meet the proportion to be specified in the Local Plan. In the absence of the Local Plan a percentage might have to be included in the NDP. It should be noted that self build will be exempt from CIL as is affordable housing. The VWHDC might question this but the logic is compelling.

PLANNING POLICY P-H4: SELF-BUILD When any site is put forward for development, the Parish Council will undertake to identify any interest within the parish in self build plots. Where such interest is forthcoming, any development of more than 20 houses will be required to meet that need. This needs to be rethought.

The plan should explain the advantages of self building, the substantial support in the NPPF (para 50) and comments made by the Planning Minister (citing European comparisons of 50% or more compared with 10% in the UK) and substantial financial assistance to group self building. The plan should

also refer to the scope for self-finishing and include a definition along the lines that only those contributing substantially to the project would qualify (e.g. meeting the Government's expectation of "genuine self building"). There is no reason why the interest should be limited to the "parish". To meet the Government aspirations something more than the trend of "10%" should be provided for and this would make any site of more than 5 dwellings eligible and appropriate. It would be for the developer to advertise plots on the same basis that they currently advertise completed dwellings and, in the absence of interest within a reasonable period, they would be allowed to continue to build the dwellings for sale or, possibly, rent. This should be a requirement placed on the developer by the policy although there is no reason why the parish council (or District Council) should not assist in this process by keeping a register.

PLANNING POLICY P-H5: CO-HOUSING When any site is put forward for development, the Parish Council will undertake to identify any interest within the parish in co-housing developments. Where such interest is forthcoming, any development of more than 20 houses will be required to meet that need. This needs to be rethought.

There needs to be some explanation in the NDP as to why this requirement is being imposed on developments. This comes from the village survey but also an understanding that cohousing contributes to the achievement of sustainable development in terms of the efficient use of materials and space, social inclusion and affordability. It is the best known way of reducing under-occupancy and making downsizing attractive. Other than contractual arrangements, that need not concern the developer or the parish council, the distinguishing feature of cohousing is the common house that can include guest accommodation, overspill accommodation and space for meeting/eating. It could be made a requirement of a housing scheme (20 dwellings and above) to provide a building that could be used as a "common house". In the absence of a demand for that use during the period in which the development of the houses is being completed, the developer would be allowed to complete that building as separate dwelling houses. The ownership of this building could be negotiated with the housing association that would also be involved in the scheme or could even be the main developer.

95 Residents of Drayton are highly car dependent, in particular for shopping, entertainment and employment. In these respects the village cannot be regarded as a sustainable location where new development would benefit from the NPPF presumption in favour of sustainable development. In the circumstances it would be justified to require all new residential development to contribute towards the sustainability of the location, at least in terms of the social facilities, primary education and biodiversity. Given the severe constraints within the local highway network, development will also be expected to ensure that there would be no net increase in the use of private cars. (See policies requiring travel plans; public transport, car sharing and car clubs).

References to "if acceptable" (paragraph 95) and "where appropriate" (policy P-H9) need explaining.

96. Should refer to contributing towards the sustainability of the location

P-89 should include car club in a list of transport benefits and local food supply i.e. affordable land and affordable housing. Allotments should be independent of the village building code. It is unlikely that such contributions will affect the suitability of the *sites* but more the suitability of the *applications* for the development.

P-H10 notwithstanding the views of VWHDC a distinction should be made between land within and that without the conservation area. The statutory test within the conservation area is the desirability of "preservation or enhancement of character or appearance". It would not be sensible for a development plan to depart from the statutory requirement.

P- H11 parking standards should set maximum not minimum standards that allow for developments designed (through a travel plan) to have reduced car ownership and use. Build for Life is sufficient, is recognized by Government and the HBF and allows for imaginative designs.

P-H12 water conservation can be a 'requirement'

98. Should refer to the contribution to the sustainability of the village as a location for new housing

100 & P-H13 reference should be made to the Sustainability Appraisal, the Climate Change Act, the 2016 target for Zero Carbon Housing, the 4th Carbon Budget prepared by the Committee on Climate Change (the Building Regulations are insufficient) , the 2011 Carbon Plan and the presumption in favour of sustainable development (see the PPF) that should require all developments to "consume their own smoke".

101. This paragraph should state that it is the objective of the NDP to protect the countryside around the village and to concentrate development in a sustainable way. The only developments to be allowed outside the existing built-up area of the village will be on those sites identified in the plan.

P-H15 sustainability should be added to the list of what is expected of new developments (the golden thread in the NPPF)

Farming and Food

Taking into account the fact that the food supply chain accounts for between 30% and 50% of carbon emissions, 200 people answered the question on the village survey expressing an 'interest in growing food locally on a smallholding (i.e. land larger than an allotment)', and the transport/health/employment advantages of local food, it is inexplicable that a plan that must contribute to the achievement of sustainable development has not fully engaged with this

issue. The affordability of land for those wanting to participate in farming is becoming as difficult as the affordability of housing. The NDP should address both of these issues by requiring applications for housing developments to include proposals for providing land for smallholding and associated agricultural dwelling(s). In fact, the Steering Group meeting on 24 January 2014 appeared to agree that this matter should be addressed in the NDP.

111. There are no 'sizeable sites' but simply farmland which has been proposed the development.

112. It would be more accurate to say that the 88 houses being proposed in the IHSP was described as "proportional growth", the scale necessary to maintain the population of the village given the reduction in household size. This should be noted as a prime reason for ensuring that new development is predominantly of small dwellings.

113. It would be sensible for this paragraph to say that the NDP can only support new housing in accordance with the NPPF if it would contribute to the achievement of sustainable development and, therefore, benefit from the presumption in the NPPF.

116. The description of the site at Barrow Road is seriously inaccurate. The ancient monument is included within the development site that would affect the use for community purposes. The issue of increasing recreational space has not been solved more through lack of effort by the PC than opportunity. Access to village facilities is relative, but the distance to the post office, hardware store, pubs, village hall, recreation ground, Caldwell day centre, church and bus stop with real-time information would suggest that this site should be ranked down. Reference should also be made to the need for a pavilion were recreational land to be provided as a "community benefit". In this context the duplication of an existing facility (the newly refurbished football pavilion on the recreation ground) and additional costs should be mentioned. Given the impact on those using the bridleway and in views approaching the village from the north it is very surprising to find that the impact on the surrounding countryside has the highest approval ranking (esp when other sites are far less obtrusive).

117. The description should follow that in the appeal decision when residential development was allowed on this site. It is the rural character of the land which the conservation area designation makes it desirable to preserve. Reference to village green and public access implies significant and ongoing costs. The site is not hidden behind the stone wall but behind a deciduous tree screen. The Leylandii currently screen the Manor Farmhouse and garden and would not interfere with the views of land left open were just the southern fringe of the site developed as approved. There is no evidence to support the statement about improvements to the parking for the shop. Reference should be made to the fact that the statutory duty to consider the desirability of preserving or enhancing the character or appearance of the area severely limits the scope for development beyond that which was allowed on appeal. In the ranking, it is very surprising to find that the prospect of housing beyond

that which was allowed on appeal and the impact on the rural landscape (the intrinsic character of this land) receives the highest ranking. This is likely to be highly surprising to any independent inspector (see the case of Slaugham and the AONB). Whilst there might be some public benefit in having access to a village green (the village already has the recreation ground and Millennium Green to enjoy and maintain) it cannot be right that the rural landscape would be improved or that the effect on neighbours and green space receives the highest ranking.

The open space left over after the building of houses designed so as to preserve or enhance the conservation area would simply be a consequence of that designation. Whilst adding substantially to the housing stock of the village, the question arises as to the contribution that would be made to the sustainability of the village. The Plan should say that In the recent past the owners were prepared to give 7 acres of land between Lock Way and the A34 that would have been sufficient to provide 2 football pitches in close proximity to the existing recreation ground, football pavilion and village hall. This would appear to be a reasonable requirement given that there is an acute shortage of playing field (the existing football pitches on designated village green) and the hall is in need of refurbishment or rebuilding. This is one of the landowners that could also contribute to meeting the demand for smallholding land.

119. Notwithstanding the historic character of the church and the place it plays in the village landscape, this would be less affected than the ancient monument at Barrow Road that receives no mention at all. Similarly, the impact of walkers is mentioned, although the users of an equally well used path extending from Barrow Road were not considered important.

122. Reference to the "alternative" site at Barrow Road suggests that this is being supported as some form of trade-off or compensation for downgrading the burial ground site. It should be sufficient to rely on the low rankings of this site, although it is unclear why the impact on traffic flows is different for this and any other site in the village (the suitability of the access is another matter, but one for the Highway Authority). Given the relative centrality of the sites at Manor Farm and south of High Street there is no justification for the site to receive the highest ranking in this respect

125. The traffic assessment for this site seems to be misplaced (all the sites with access on to the local highway network would have equal impact). It is difficult to understand why there is likely to be any let alone inevitable on-street parking. The only difference will be that the sites on the periphery are most likely to generate more local car traffic and should be ranked down accordingly.

127. It is surprising that the offer by the landowner to make this available for playing fields, and the apparent suitability of the land for this purpose is not mentioned. In fact, the unique suitability of the land for this purpose should be stated as a major constraint on its development for any other purpose.

Long Meadow (paragraph numbering askew)

It is very surprising that this site does not receive the lowest ranking for access to amenities. In some ways it is comparable to Barrow Road that should be ranked down in any event (compared to Manor Farm and South of High Street), this site is actually very nearly as close to Steventon as it is to Drayton and would normally be described as a consolidation of ribbon development that would contribute very little if anything to the village of Drayton that is divided as much by its length (about 1.5 miles north to south) as by the B4017.

Fisher Close

It is unclear why this site should have a greater impact on traffic flows than the land to the rear of Lock Way?

Other Sites

There is no harm in making reference to the development proposals that have been made to the west of the A34 but there is no reason to suggest that development in this area might take place.

The question of where the some or all of the sites described in the NDP are being supported is one of the most important to arise from this process. It is, therefore, surprising that the plan does not appear to come to any firm conclusions in respect of the suitability of sites that clearly have significant drawbacks. Reference could be made here to the attempt to phase development (see example of policy at DRS 5). In order to make it clear whether a proposal is in accordance with the plan (section 38 (6)) it would be preferable for the plan to state which sites are unacceptable and those which, subject to phasing and contributions towards sustainability, would be supported. It should then be said that sites that have not been considered could not be in accordance with the plan but other material considerations must always be taken into account in deciding whether they should be permitted.

Additional policies

The Plan could explain the advantages of Lifetime Neighbourhoods (a reason to play down the need for and cost of Lifetime Homes) based on the 90% of people wanting to move within a village (compared to the 20% who want to move within a town).¹ This is the justification for a phasing policy but also the requirement for small dwellings (that are nearly absent in the current market) and the easy reconfiguration of all new and larger houses. There is also good evidence for policies that would support a conditions removing permitted

¹ There is no sign of this trend for urban to rural migration stopping. When asked, 9 out of 10 people living in the countryside said that they would prefer to stay where they are, compared to urban areas where only 2 in 10 people stated that they wanted to stay – and half reported a desire to move to the countryside. (The Taylor Review p34 http://www.wensumalliance.org.uk/publications/Taylor_Review_Livingworkingcountryside.pdf)

development rights for new dwellings and requiring the energy efficiency of existing dwellings to be increased when permission is granted for their extension (In January 2012 the DCLG's own consultation on this matter said that it would save the economy £11 billion; save 130 million tonnes of CO2 and lead to 2.2 million households taking up the Government's Green Deal policy and thereby having lower fuel bills. DECC Secretary of State Edward Davey said the policy 'had merit'. In November 2012 DCLG scrapped the policy!)

The NHS involved in care of the elderly and county council health and wellbeing departments are very interested in how the elderly will be housed. The Plan should explain how this need (likely to be mentioned in the SHMA) is being provided for as housing suitable for the elderly but not designed for and restricted to them. This would not rule out a sheltered housing scheme or even a nursing home but housing suitable for the older age groups to move when they want to rather than when they need to should be the priority.

There should be a policy prioritizing terraced housing running east/west so as to make the most of the thermal efficiency of this type of housing, the efficient use of the land and the efficient use of both passive solar gain and solar energy capture on the roofs. (see appeal decision referred to above).

There could be a policy setting out a hierarchy of sites for solar panels; the A34 and building roofs first and only then the use of farmland in which case proposals for the use of the land for growing crops or grazing livestock should be agreed. This could be part of a separate section on community energy following Government advice in Community Energy Strategy: People Powering Change DECC February 2014

"Neighbourhood planning offers a real opportunity for the growth of community energy where communities identify this as a priority for their neighbourhood. DCLG will work with DECC to coordinate the work of advice and support services in order that communities considering including proposals for community energy in their plan have access to advice and best practice on neighbourhood planning for community energy, together with information on existing examples

The Zero Carbon Home 'Allowable Solutions' framework will offer a potential new source of funding for community energy groups from 2016. The Government consulted last year on a framework for 'Allowable Solutions' – ways for house builders to offset carbon emissions from new homes which cannot be mitigated by measures like fabric insulation of building integrated renewables like solar panels. The consultation asked for ideas on the sorts of measures which Allowable Solutions could support, which could include local projects which are cost effective, and the criteria to be used. The Government is considering the responses to the consultation and will announce its conclusions in due course. "