

## Drayton NDP

### Reaction to the draft Strategic Local Plan (published 2014 02 21)

1. This seems to be based on a new SHMA although the evidence of the work carried out for the Oxfordshire Districts is not available. The VWHDC see the draft plan, if and when approved, as creating the 5 (or even 6) year land supply required to take control back from the 'permission by or in fear of appeal' that is the way the 'planning' system has worked in this area over the last 4 years or so.

2 When responding to the DSLP it seems that Drayton is faced with the following choices:

- the best part of 2 years has been spent preparing an NDP and this should be allowed to run its course with adoption in 2014 of a plan showing sites suitable for a similar number of houses to the 200 being proposed by the VWHDC on just one site,
- the land to the south of High Street is considered suitable for the strategic allocation of 200. However, a development of this scale (about 20% growth) would only be acceptable if it was phased over the plan period and in sustainable ways that are designed to meet rather than create both need and demand for further housing in the village within the following ten years.
- the village would be prepared to support both the strategic site of 200 and substantial developments on the other sites shown in the NDP.

3. There is a contradiction in the DSLP between para 4.4 that describes the area as 'highly sustainable' due to 'proximity to Oxford City' and having 'excellent public transport'. The VWHDC is fully aware of the level of car dependency (see para 8.56 of the 2011 Local Plan, village survey and 2011 Census) and that it is not a sustainable location for new development. Having more facilities and a better bus service than some smaller villages does not make Drayton a sustainable location (ie where residents can reduce their reliance on the car by 50% by 2020, 60% by 2030 and to only ULEVs by 2040). This would only be the case with a very substantial reduction in car travel through improving local facilities and increasing the use of public transport and other low carbon modes.

4. In fact users (and operators) of public transport in the area to the south of Abingdon are in despair about the problems in running a bus service due to the existing levels of congestion. Para 4.8 states that development should **only** take place in Drayton, '...if satisfactory measures to improve highway capacity are identified and shown to be deliverable'. The requirement in the DSLP that '... contributions for the enhancement of a premium bus service will be required' does not address the pre-requisite set out in para 4.8. Drayton might be on a designated premium 'route' but does not have a premium 'service'. Before the proposed allocation becomes a permission, the LPA and Highway Authority must explain to Drayton parish council, residents and both bus companies and bus users what improvements have been identified and, crucially, how a premium bus service will actually be delivered.

5. The Highway Authority is on record as expecting no more than 20 dwellings on sites in Drayton and, in the evidence given to the inquiry into the 160 dwelling development to the south of Abingdon, believed that development to cause severe highway impacts. Unless new evidence is available, then a strategic housing site in Drayton would not be achievable without causing counter-productive levels of congestion. The severe traffic problem to the south of Abingdon should be as important to any potential developer, and those expecting Science Vale to function as an employment area, as it is to existing residents of Drayton and the surrounding villages. The only known ways of reducing car reliance and avoiding severe congestion are a functioning bus service together with developer funded car clubs and increased walking and cycling.

6. Assuming that the VWHDC proceed with the allocation of about 7ha to the south of High Street there are terms on which this could be made acceptable as an extension to the village.

- given the propensity of people to choose to move within the village (about 90% compared to 20% within urban areas) building 200 new houses within a few years would not provide the opportunity for more than the few households wanting to move in that short period to exercise that choice. On completion of the development all existing residents, including those in the new houses, would have to rely on the existing housing stock unless it was increased again (and again). The sustainable way to meet the local need for housing (and not just existing village residents) is to phase the 200 dwelling development and to design it in 'cells'. If the housing is conventional in housing mix then phasing would be even more important. If the new housing was broken down into self-building, self-finishing (both to count as affordable and CIL free), co-housing and local needs housing (see the 2012 Drayton housing survey), then the development would have a more organic character, and phasing might be less important. By providing these different forms of housing delivery, implementation might actually be faster as it would not all be predicated on the developer waiting on sales into the normal market. The need for new housing to be predominantly small units (where there is likely to be the greatest need), adaptable, and south facing terraces with PV, applies whether or not phasing takes place in order to contribute to the achievement of sustainable development.

7. Local needs housing could be provided through a Community Land Trust (see Winslow NDP) to ensure ongoing affordability and availability to local occupiers.

8. The strategic allocation of 7 hectares would leave about 2 ha (5 acres) that could be used as smallholding(s) to grow local food to address the response to the village survey (200 residents expressing an interest). It is disappointing that agricultural land quality seems to have played no part in the decision as to which strategic sites are included in the DSLP.

9. As well as demonstrating that the deficiencies of the bus service could be made good, there are other deficiencies to take into account such as the state of the village hall and playing field provision. Without the Barrow Road housing site (definitely not needed in the next 5 years), the needed playing field provision has to come from sites that do come forward (ie Manor Farm and/or the South of High Street). Identifying the land to the west of Lockway as being suitable and desirable for playing field use would make this provision more certain as well as open it to public discussion at the draft plan stage. The NDP should also be the place to set out the need for enhancing village services to make the village a sustainable location for new development (see 'presumption' and 'golden thread' in the Framework).

10. In summary, the principle of development having to be sustainable applies whether or not it is proposed in the NDP (which has the extra basic condition of contributing to the achievement of sustainable development). This could only apply to the proposed strategic allocation if the 200 houses (over 20% growth) were predominantly small so that they met rather than created local need and demand for housing. Development at that scale should be phased and be provided to meet different market sectors as well as being energy efficient, self build/finish, co-housing, suitable for both the elderly and new households, adaptable, affordable and meeting local needs (possibly involving a CLT).

11. The need to provide enough houses does not override the need for the location to be sustainable or for the development to contribute to its sustainability. In the case of Drayton the location would not be sustainable due to existing car dependency and traffic congestion, inadequate bus services and other village/local services.