

## **INTRODUCTION**

Objections are lodged to the submission of the Drayton Neighbourhood Plan 2014-2031, Pre Submission Consultation Copy, Version 2, June 2014, to Vale of White Horse District Council in advance of the adoption of Vale of White Horse Local Plan, or indeed to the outcome of the Examination into outstanding objections to the Local Plan. It is considered that the submission of the Neighbourhood Plan to Vale of White Horse District Council is premature to a variety of issues being resolved. Clearly some if not all of these issues will affect the Neighbourhood Plan.

The Vale of White Horse are still in the process of preparing and consulting upon their Local Plan Part 1 Strategic Policies & Sites. The Council's latest Local Development Scheme outlines the key stages for the Local Plan as follows:-

Statutory Public Consultation (6 weeks)	Mid August 2014
Submission to Secretary of State	End October 2014
Estimated date for Examination	February 2015
Estimated date for Adoption	July 2015

There will no doubt be representations made in respect of the Local Plan Stage 1 (Blue Cedar Homes will be making representations), in respect of Duty to Cooperate, the objectively assessed housing need for the District and how it should be distributed as well as the settlement hierarchy, amongst other issues.

All of these issues will have implications for the Drayton Neighbourhood Plan and its programme. It is therefore important that the Neighbourhood Plan is delayed pending the outcome of these important policy considerations. By progressing the Neighbourhood Plan now these policy issues cannot be taken into account and accordingly the Neighbourhood Plan will not be soundly based.

## **Recommendations**

Objections to the submission of the Drayton Neighbourhood Plan to Vale of White Horse District Council in advance of the resolution of a number of important policy consideration in the Local Plan Stage 1 which will have a direct impact on the Neighbourhood Plan. The Plan should be delayed until the implications of these policy issues have been resolved.

## **SITE SELECTION**

Objections are lodged to the non allocation of land to the south of 10 Halls Close, Drayton for residential development. Blue Cedar Homes are a specialist developer of high quality retirement homes. They have an option on the site and seek to develop it for a predominantly retirement development. They are unclear why the site was not allocated for development.

The site selection process outlined in the Neighbourhood Plan is based on 8 criterion as follows: -

- i. Preserve the historic character of the village;
- ii. Have low impact on traffic flows;
- iii. Have minimal impact on surrounding rural landscape;
- iv. Have low impact on neighbours and green space in the village;
- v. Offer easy pedestrian access to amenities;
- vi. Be subject to low traffic noise;
- vii. Be within the existing built up area of the village; and
- viii. Not be of special ecological or archaeological significance.

The Blue Cedar Homes site is identified within the Council's SHLAA as Site DRAY13 Land to the south of 10 Halls Close, Drayton. The SHLAA concludes that the site is available, suitable and deliverable. In other words there are no site specific objections to the development of the site. Recently the lack of a site specific objection has been confirmed in correspondence from the Parish Council. It is apparent that the issue the Parish Council have is one of timing not principle.

The site assessment is set out in Table 5 of the Neighbourhood Plan. It shows that the site does not have any red issues but scored amber in respect of 4 criterion namely: -

- i. Have low impact on traffic flows;
- ii. Have minimal impact on surrounding rural landscape;
- iii. Have low impact on neighbours and green space in the village; and
- iv. Not be of special ecological or archaeological significance.

It is unclear what evidence was used to score the site in this way but it is suggested that if an objective approach is used they will score green as follows: -

- i. Whilst it is true that some traffic will be generated by the development it is considered that given the nature of the proposed development (i.e. retirement dwellings) with the proximity of the site for local amenities that it will be extremely low. We understand that concern has been raised about potential junction spacing however a new junction will not be required to serve the development.
- ii. Given the size of the site and its well defined boundaries it will have minimal impact on the surrounding landscape;
- iii. The site can be designed to ensure no adverse impact on neighbours and it will not use green space in the village. Indeed all Blue Cedar Homes' schemes incorporate large areas of useable open space. All highway authorities that Blue Cedar Homes have dealt with across the South West have agreed that the traffic generation of Blue Cedar Homes' schemes is extremely low with at most 2 peak movements per day;
- iv. The site is not of special ecological or archaeological significance (suggest green not amber). Survey work currently being undertaken on both ecology and archaeological issues have confirmed this position;

In view of the above, it is considered that the site has potential to secure green in all criteria and accordingly should be allocated.

Despite the lack of specific site objections, the site was not allocated for residential development which indicates a flaw in the site selection methods. Indeed it is apparent that in respect of all effects of development on the site that they are capable of being satisfactorily mitigated.

### **Recommendation**

Objection to the non allocation of land to the south of 10 Halls Close, Drayton for residential development (retirement). The site should be allocated for residential development.

## HOUSING

Objections are lodged to the proposed housing provision for Drayton. The emerging Vale of White Horse Local Plan Part 1 identifies a housing provision of some 200 dwellings to be accommodated on land to the south of Drayton, immediately to the west of the Blue Cedar Homes site. However, paragraph 149 of the draft Neighbourhood Plan states: -

**“At the time of writing, we do not know if or when the South Abingdon development of 159 houses will go ahead, and there are several other developments planned in neighbouring villages. All of these will place extra demands on the local road network, and they may or may not have a bearing on the number of houses that can be built in Drayton. We do not know what figures will be determined for Drayton in the VWHDC’s updated Local Plan 2031, Part 1 of which, dealing mainly with Abingdon, Wantage and Faringdon, will not be published before the end of 2014 (Part 2, dealing with the Vale’s larger villages, including Drayton, may not be available before 2016). Residents should also be aware that a Neighbourhood Development Plan cannot be used to reduce a housing figure or ‘block’ development, but it can be used to increase the number of houses if this would bring spin-off amenities that benefit the village.”**

In this context, it is unclear what the overall final housing provision for Drayton will be. Drayton is one of the larger villages in the Abingdon sub area and has a wide range of facilities and services. It therefore has the potential to accommodate considerably more than 200 dwellings over the next 15 year period and could be increased. The Plan should not proceed until there is a clear conclusion on the overall housing provision for Drayton.

### **Recommendation**

Objections are made to the proposed housing provision on the basis that it is too low and should be increased to at least 350 dwellings.

## **NORTH OF BARROW ROAD**

Objections are lodged to the allocation of this site for residential development i.e. 60 dwellings. It is apparent from the site assessment undertaken by the Neighbourhood Plan that this site scores 5 amber criterion i.e. more than the Blue Cedar Homes site but is still allocated for residential development. This is a clear indication that the site selection process is not robust. The site is remote from the village centre when compared to other possible sites and does not represent a logical extension to the settlement. In comparison, land to the south of 10 Halls Close is in a much more sustainable location.

### **Recommendation**

Delete land to the north of Barrow Road as a residential allocation and substitute it for land to the south of 10 Halls Close, Drayton.

## **SITES NOT INCLUDED IN THE PLAN – PARAGRAPH 145**

Blue Cedar Homes welcome the inclusion of paragraph 145 in the emerging Neighbourhood Plan. They agree that circumstances regarding a particular site can change over time. The land south of 10 Halls Close is available for development and is now controlled by an experienced developer. Blue Cedar Homes would like to work with the local community in bringing forward a retirement led development which would benefit the local community. It is recognised that one of the specific needs in the village, as outlined in the Housing Need Survey May 2012, is the provision of retirement accommodation in order to allow existing residents to downsize. In turn, this will allow family homes to become available. However, further explanation is required on exactly how this issue will be implemented.

### **Recommendation**

Further explanation is required on exactly how non allocated sites can come forward.

## **PLAN MONITORING AND REVIEW**

Blue Cedar Homes note in paragraph 175-178 that it is intended for a full review of the Neighbourhood Plan is to be undertaken every 5 years. Blue Cedar Homes are concerned that this may be too long a period and perhaps a review is required say every 2 years. If not, changes in national and indeed local plan policies would render the plan out of date in a short period of time.

### **Recommendation**

Consideration be given to a review of the Plan every 2 years.