

## 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. **Drayton2020: The Objections are noted and are commented on below. A copy of this letter has been drawn to the attention of VWHDC**

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.

**Drayton2020: DCLG have already been consulted on the issue of neighbourhood plans preceding Local Plans and have advised that NDPs can be made in advance of Local Plans. There have also already been legal challenges on this issue, and these have confirmed the DCLG guidance. Drayton's NDP is taking account both of retained policies in the VWHDC current Local Plan 2011 and the emerging Local Plan 2015-2031, and is compliant with both. VWHDC have been consulted throughout and have been ensuring complete compliance. Indeed, the need for a 2<sup>nd</sup> 6 week consultation arose from a significant change in the draft Local Plan in respect of the SHMA numbers and the allocation of a VWHDC strategic site in Drayton. The respondent's above recommendation is **rejected. No change in Plan required.****

## 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 criterions 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.

**Drayton2020:** The site selection scoring has been re-visited to ensure consistency following the above and other comments and revisions have been made in the Examination copy as required. The VWHDC SHLAA identifies sites all around the village, but it is up to the neighbourhood plan to allocate actual sites. The Halls Close site had not previously been put forward by the landowners/developers (despite calls over 18 months for such proposals). Drayton2020 has consulted the community over the last 2 years on sites, housing numbers and mix and a wide range of other related planning and community issues. No one has suggested the Halls Close site. Drayton2020 has completed its community consultation, selected its preferred sites and dealt with the issues of housing numbers, types, infrastructure issues and community requirements. To admit a new proposed development of 20 houses on an entirely new site at this late stage would require the NDP process to start from scratch over again, wasting 2 years of effort, £30k of public money and 8,000 hours of community involvement. If the Halls Close is admitted to the process, then there is nothing to stop this being repeated by other subsequent landowners/developers, and the NDP would never be finished.

## **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.

**Drayton2020:** VWHDC have informed Drayton2020 NDP that there will not be a housing target allocation for Drayton, nor any of the other villages, so the respondent is factually incorrect in their assertion. VWHDC will allocate strategic sites (those up to 200 houses) and then a target for all larger villages in Part 2 of the Local Plan. As explained in the Drayton NDP, informal guidance on housing numbers have risen from ‘proportionate growth’ of 10% (88 extra houses) to over 200 (with the allocation of South of High Street, Drayton as a VWHDC ‘strategic site’). The DRAYTON NDP currently allocates three sites for up to 250 houses. The South of High Street site has been proven in the NDP, to VWHDC’s satisfaction, to not be capable of accommodating 200 houses if the environmental, drainage, archaeological and community facilities are allowed for. The other two housing sites proposed for Drayton will compensate for the reduction in housing density proposed for South of High Street. A fourth site and an extra 20 houses is not required to meet either the Drayton NDP nor the VWHDC current or emerging Local Plan. The

respondent's suggestion that Drayton take an extra 350 houses (representing a growth of over one-third in the village) is completely arbitrary and not supported by any firm evidence. The quotation from the Drayton NDP is taken out of context and a proper reading shows that this statement is to cast doubt on the capacity of the local road infrastructure to support both the proposed Drayton housing numbers and those already and potentially allocated between South Abingdon and the A34 (i.e. in Steventon/Milton/Sutton Courtenay). The respondent's recommendation above is **rejected. No change in Plan required, beyond the review of the fair application of the site selection criteria.**

#### **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.

**Drayton2020:** The Drayton NDP Examination copy has been reviewed again for the fair application of the site selection criteria in response to the above objection and observations of some other respondents. The North of Barrow Road site is not 'remote from the village centre': the walking distance to the local shops is not greater than from Halls Close. Drayton Primary School and the Millennium Green are both closer to Barrow Road. The Barrow Road site is already occupied along both Abingdon Road and Barrow Road. Both sites are on the outside edge of the village and against the countryside fringe. Other criteria distinguish the desirability of the Barrow Road site over the Halls Close site (see site selection criteria).

#### **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.

**Drayton2020:** see the Examination copy of the Drayton NDP for the final version of how these issues are addressed. Sufficient retirement accommodation is already planned within the three proposed housing sites – these will include affordable homes, as identified in the Housing Needs Survey. The HNS does not, as the respondent infers, identify a need in Drayton for an exclusively over-50s private development: to draw this conclusion is to misread the data. **No further change in Plan required in respect of Halls Close land.**

#### **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

**Drayton2020:** Whilst a more regular review may be required for larger settlements such as towns in the region, the Drayton NDP sets out a 15 year plan, and a 5 year review is adequate to capture national and local policy changes. A Parish Council is elected every 4 years, so this allows for review against any new local PC policies. A two year review is unaffordable in a small community like Drayton, which has neither the voluntary person hours nor money to undertake such regular review. The current NDP has taken 2 years to get to Examination stage: a 2 year review would mean that there would never be an NDP in place, which is clearly in contradiction both of the Localism Act and common sense. Drayton2020 believes the current 5 year review proposed is adequate and proportionate to community resources and local need.

The respondent's recommendation above is **rejected**. **No change in Plan required,**