



# ENGLISH HERITAGE

SOUTH EAST

**[Drayton2020 Responses given in RED below]**

Mr David Perrow  
Drayton (Abingdon) Parish Clerk  
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Abingdon  
Oxon, OX14 3TB

Our ref: HD/P5354/01/PC1  
Your ref:  
Telephone 01483 252040  
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29<sup>th</sup> July 2014

Dear Mr Perrow,

## **Drayton2020 Neighbourhood Plan Revised Copy Pre-Submission Consultation**

Thank you for your e-mail of 16<sup>th</sup> June advising English Heritage of the consultation on the Drayton2020 Neighbourhood Plan Revised Copy Pre-Submission. We note that this is a consultation on a revised version of the Plan but rather than confine our comments simply to the revisions, for clarity we have reiterated our comments on the previous version where appropriate.

We welcome the recognition of the heritage interest of the parish in paragraph 28 but we would welcome greater detail and reflection of the significance of the historic environment, particularly as this information is not to be found in the Sustainability Appraisal Scoping Report on which we commented in December last year. We would like to see more information about the Conservation Area and listed buildings in the town and their significance, in addition to the two Scheduled Monuments described in the Scoping Report. There should also be reference to non-designated features of local interest - is there a list of locally important buildings and features ?

**Further details of the Conservation Area are contained in:**

- The Drayton Design Guidelines
- The Sustainability Appraisal (June 2014)

Which are published on the Drayton2020 website Consultation page:  
**<http://www.drayton-near-abingdon.org/drayton2020/consultations/>**

**In the Design Guide Character Area A comprises the Conservation Area (High Street/Church Lane) and the equally important area of Sutton Wick. The introduction to this section reads:**

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## 5.1 Character Area A: Predominantly large detached housing with an informal building line

a) This zone includes the conservation area at the heart of the village. This coincides with the earliest inhabited part of the village and as such includes many historical buildings. It is characterized by a great variety of different house styles, generally on large plots, some of which are set back, whilst the oldest houses generally open directly onto the road. There are several very large old buildings including the Manor House and the Grange. St. Peter's Church is also in this part of the village, along with another chapel, now renovated into a residential dwelling.....[Cont'd]

and...

### 6.1 Conservation Area Principles

Principle 1: Proposals to develop or redevelop sites and convert buildings to new uses will be required to conserve or enhance the character of the Conservation Area.

Principle 2: Priority will always be given to the retention and enhancement of buildings of heritage value identified in the Conservation Area

Principle 3: New development will be expected to be of the highest quality design that respects and enhances the character of the Conservation Area. High quality contemporary architectural design will be encouraged, though high quality restoration through replication will not necessarily be rejected.

Principle 4: New transport and parking provision will be expected to respect and where possible enhance the character of the Conservation Area. Prominent insensitive parking provision will therefore not be acceptable.

Principle 5: Historic surfaces and street furniture will be retained, enhanced, and restored wherever practicable.

Principle 6: The historic views and vistas should be retained, enhanced, and restored.

Principle 7: Advertising and signage proposals will be expected to respect the character and appearance of the Conservation Area in terms of siting, size, number, materials, and colours.

The Sustainability Appraisal, Design Guide and the main Drayton2020 Plan are currently being revised for submission to VWHDC on 1<sup>st</sup> September. The Design Guide revision will include (in Section 6.1 above) – the VWHDC map of the Conservation Area, and reference to the English Heritage Listed Buildings list for Drayton, which will also be included as an Appendix to the Design Guide.

Further information on designated assets is available from The National Heritage List for England, on local listing from the English Heritage guide (our letter on the Scoping Report included an appendix with links to these documents) and on non-designated heritage assets from the Historic Environment Record (HER) maintained by Oxfordshire County Council.

The full list of Listed Buildings is included on the Resources, Policies and Evidence page of the Drayton2020 website:

<http://www.drayton-near-abingdon.org/drayton2020/resources/>

where there are also a number of other documents listed which have been analysed and taken into account in developing the Drayton2020 NDP

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There are a number of references to the character of the village in the Plan e.g. in Table 4 and paragraphs 46. We welcome and support the aims to develop an environment that builds on and enhances the distinctive character of the village; to weave the historical background of the village into any new development to retain character; and to maintain and enhance the character of the village. However, we regret the loss of the aim to emphasise the village's historical roots to strengthen its identity.

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We also welcome and support the reference to the village's historical character and the requirement for any development in or adjacent to the Conservation Area to look to conserve and enhance it in paragraph 50. We also welcome and support Policies P-LF1 (but see comments below), P-LF3, P-LF4, P-LF5, LF-7 and P-S.1 although we would prefer to see a specific policy for the conservation and enhancement of the historic environment and heritage assets in the parish.

**These points are addressed by the Design Guide and the Sustainability Appraisal**

However, we are not aware of any studies or exercises to investigate, understand and explain the historical or other character of the village. When commenting on the Sustainability Appraisal Scoping Report in December last year, we noted that there was no description of the character of the village and no references to any characterisation exercises of the village as a whole or of the Conservation Area (in fact, it is our understanding that the Conservation Area was designated in 1969 but that there is no Character Appraisal or Management Plan).

**These points are addressed by the Design Guide and the Sustainability Appraisal**

**Regrettably, the VWHDC have not undertaken any formal assessment, description or management plan for the Drayton Conservation Area, and this is beyond the scope and resources of the Parish Council and Drayton2020.**

**The VWHDC designation of the Drayton Conservation Area is on the Drayton2020 website Evidence page and is as follows:**

Drayton

Conservation Area designated 9.7.69.	The conservation area currently covers the historic core of the village and is considered satisfactory.	No change.
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And:



## Drayton Conservation Area

The Drayton Conservation Area which covers only a small part of the village is characterised by its variety of spaces and buildings, and the fact that open paddocks form much of the area.

The High Street with its great variety of buildings ranging from the Stone Manor House, to farmhouses and farm buildings, thatched and tiled cottages of stone, brick and timber framing is unified by stone walls and the many mature trees.

Henleys Lane and Church Lane with more sporadically sited traditional buildings, walls, trees, green embankments and paddocks have a particularly rural feel. A delightful environment is created in Henleys Lane near the corner with Church Lane where overhanging trees emphasise its narrowness.

Gravel Lane leading from The Green with the Manor Farm complex and the Grange has its own distinct feel, enhanced by the absence of made up kerbs.

Drayton is characterised by a vast range of traditional materials, stone, brick, clay tile, thatch timber framing, and weatherboarding on agricultural buildings. It is notable that boundary walls are almost exclusively stone, the Grange in Gravel Lane being a notable exception.

A characterisation study can help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.

This would be useful, if VWHDC would undertake this work. We note, for instance, the Conservation Area evaluations undertaken by Cherwell District Council:

<http://www.cherwell.gov.uk/index.cfm?articleid=1672>

Without such a detailed understanding of the distinctive character of Drayton, what its defining characteristics are, it will be difficult to ensure that new development retains (or reinforces) historical character and that that character is generally maintained and enhanced. It will also be difficult to ensure that sites for new development are the most appropriate in terms of respecting the historic character of the village, which we note was one of the most important site selection criteria voted for by local residents and which we welcome and support (as we do criterion 8).

These points are addressed by the Design Guide and the Sustainability Appraisal

As regards the proposed development sites identified in the Plan, we have the following comments.

Manor Farm: this site is within the Drayton Conservation Area. Figure 3 of the Plan indicates that the proposed housing development might be restricted to the eastern and south-eastern side of this area, with the rest given over to a new village green.

However, Policy HE1 of the Vale of White Horse Local Plan 2011 states that development will only be permitted on open spaces in Conservation Areas where it

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can be shown that these areas do not make a positive contribution to the Conservation Area's special interest including its relationship with its landscape setting or to views within, into, or out from the Conservation Area which would be lost or damaged were the development to be permitted.

We recognise that Policy P-LF4 of the Neighbourhood Plan is intended to ensure that any development within or adjacent to the Conservation Area conserves or enhances its character and appearance and its setting, but without a detailed character appraisal of the Conservation Area, is there a proper understanding of the

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contribution of this open area to the special interest and character of the Conservation Area and can the Parish Council be confident that development on this site would not harm that special interest/character and the character of the village (paragraph 92 of the Plan describes the Conservation Area as key to the character of the village) ?

Detailed discussions have been undertaken with the developers and with VWHDC Planning department over the last 2 years, including two Design Workshops. The developers have submitted a Design Brief to VWHDC to ensure that there is a consensus with the planning authority and the local Parish Council. Whilst this Design Brief has not yet been agreed, and the Drayton2020 Steering Group has lodged some reservations about certain details in the latest iteration, there is broad satisfaction with this approach. The VWHDC have been represented by senior planners, and by Sarah Oborn, their Design Advisor.

An archaeological survey of the Manor Farm site was carried out in May/June 2000, and the results of this are published on the Drayton2020 Evidence page

Without further detailed assessment, English Heritage is not convinced of the suitability of this site for development in respect of the historic environment and considers that the retention of this allocation without further assessment the potential exists for internal conflict within the Plan and conflict with both Local Plan Policy HE1 and the National Planning Policy Framework.

As mentioned above, a detailed assessment of the Drayton Conservation Area undertaken by VWHDC would be welcome.

A planning appeal enquiry was undertaken on Manor Farm some 15 years ago, so the nature of the Drayton Conservation area was thoroughly explored by the Inspector at that enquiry.

South of High Street: our records do not show any designated heritage assets on this site, but it does abut the Conservation Area and therefore forms part of the setting for the Area (and of a number of listed buildings). Both Policy HE1 of the Local Plan and Policy P-LF4 of the Neighbourhood Plan also seek to protect the setting of conservation areas in the district from harmful development.

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This part of the Conservation Area is very much of a village edge character, with widely spaced buildings, a lot of trees, wide verges and rubble stone walls. These elements give it a very pleasant appearance. Any access to the development site will have to be across this area and the only way of achieving it without demolishing buildings which make a positive contribution to the conservation area would be to introduce a road at the west end of the site, demolishing a section of stone wall.

This will inevitably involve a degree of harm to the character of the area as the village edge character just described will be eroded by the new road. In order to mitigate this harm as far as is possible particular care will need to be paid to highway engineering and landscaping and further detailed assessment work is required to inform the exact site boundary and the quantum, nature and layout of development on this site.

There should also be a requirement to retain the external field boundaries, which are identified in the Oxfordshire Historic Landscape Characterisation, currently underway.

Discussions have also been taking place with the developers South of High Street for most of the last two years. They are aware of the Conservation Area issues and there are plans to retain the listed barn. Access onto the High Street is a critical issue, not just because it passes through the Conservation Area, but because of traffic volume issues and their impact on the High Street. The VWHDC have designated this as a Strategic Site in their SHLAA and draft Local Plan, capable of taking up to 200 houses. The Drayton2020 have negotiated this down to circa 130 houses, with retention of the landscape and historic nature of the site, and emphasis has been given to the design aspects, including developing the Design Guide to ensure building design and materials are in keeping with the adjacent areas of the village.

North of Barrow Road: According to our records, Site 1 has no designated heritage assets, but the Ordnance Survey map shows tumuli in the northern half. The fact that these are not scheduled monuments does not necessarily mean that they are not of national significance. It would appear that the Parish Council has sought the advice of the Oxfordshire County Archaeologist (hopefully for all three proposed development sites) and we presume that no objection has been raised to the principle of the development of this site.

As you say, the County Archaeologist has been involved in particular with this site. The tumulus seems to be a Victorian invention, but the site shows Roman field patterns in air photographs, and the developers are in touch with the County Archaeologist to ensure that their survey meets his requirements. The layout of this site has been particularly sensitive, and discussions have taken place between the developers, existing site neighbours and the VWHDC, including Richard Webber (County/District/Parish Councillor). The VWHDC and the village have been at pains to ensure that development does not intrude into the open countryside and that the open aspect of the site when approaching from Abingdon is retained – the site is on an elevated platform above the floodplain.

On the Manor Farm site, the archaeological survey was completed in 2000 (see above) and nothing significant found.

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On the South of High Street Site, this is the site of the former Open Field system, see the 1815 Enclosure Map on the Evidence Page of the website. The developers are undertaking an archaeological survey and are aware of the archaeological significance of the area to the north-east of their site, which is to be left undeveloped.

Whilst we welcome the requirement for a full archaeological survey, the Plan should specifically state that the developable area (and therefore the number of houses) and layout is dependent on the results of that survey.

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These comments are without prejudice to any comments we may wish to make on any proposals for the development of these sites should they be taken forward.

In our letter on the previous version of the Plan in February this year, we expressed our view that further work is necessary to understand the character of Drayton as part of the evidence base in order to be confident that the development of any of the sites identified for potential development would not be harmful to the special interest of the Conservation Area or the character of the village as a whole. Even if development on these sites was acceptable, we considered that a greater understanding of their contribution to the village might indicate what form of development would be preferable.

There were links in the appendix to our letter on the Sustainability Scoping Report to "Placecheck", "Building in Context", the "Oxford Character Assessment Toolkit" and "Understanding Place", all of which contain further information on local characterisation. We reiterate our offer that we would also be pleased to discuss characterisation with you and possibly help prepare a characterisation workshop.

Drayton2020 has worked with the Design Council and had a three week consultancy with Meredith Evans, a design consultant which the Design Council appointed and funded. Resources such as 'Placecheck' and 'Understanding Place' were looked at. Drayton2020 has opted to capture the character and history of Drayton in the Design Guide, which will be an adopted Planning Document, rather than in any less formal document which will merely be archived. A walk round the village was conducted first on 8<sup>th</sup> September 2012, at the launch event, to ask residents to identify features of the village they liked and those they did not. Subsequently, surveys were undertaken by Adams Habermehl (Landscape Architect) to capture the form of the village in maps – including the significant vegetation and listed trees (though VWHDC's records and maps of TPOs are incomplete). Meredith Evans walked around the village with the Drayton2020 team looking at how the village might be characterised, and subsequently an archive of photos was assembled by Janet Manning for Drayton2020. Pegasus Design consultants gave us free advice on the character areas of the village, and this information has all been fed into the Design Guide and other documents and evidence.

We are disappointed and concerned therefore that there is no indication that any

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such characterisation has been undertaken or is planned to inform the Plan. Without this additional work we consider that the evidence base for the Neighbourhood Plan is inadequate.

Drayton2020 believes that the DRAFT Plan, taken together with the Design Guide (an Appendix to the Plan) and the underlying Sustainability Appraisal and the published Evidence on the Drayton2020 website at <http://www.drayton-near-abingdon.org/drayton2020/resources/>

constitute a thorough analysis of Dayton village, and are disappointed in the conclusion reached by English Heritage.

It would be useful if a meeting could be arranged as soon as possible between English Heritage, representatives of Drayton2020 Steering Group and VWHDC (Katherine Pearce and Sarah Oborn) to explore where the differences in our understanding lie on this issue.

We hope these comments are helpful. Please contact us if you have any queries.

Thank you again for consulting English Heritage on your Neighbourhood Plan.

Yours faithfully,



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