



# ENGLISH HERITAGE

## SOUTH EAST

Mr David Perrow  
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14<sup>th</sup> August 2014

Dear Mr Perrow,

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

Thank you for your e-mail of 12<sup>th</sup> August with Drayton2020's responses to the comments I made in my letter of 29<sup>th</sup> July on the Drayton2020 Neighbourhood Plan Revised Copy Pre-Submission.

I am grateful for your drawing my attention to the Drayton Design Guidelines and the Sustainability Appraisal Final Report. I am sorry that I have not previously given these the attention that I should have and consequently put you to this trouble.

The Design Guidelines do set out the historical development of the village, which I welcome, and I note the list of listed buildings within the village in Appendix A. It would perhaps be helpful to say a little more about the age and distribution of the listed buildings - perhaps they could be highlighted on Figure 1 or shown on the map of the Conservation Area to be included. There should ideally also be reference to non-designated features of local interest - is there a list of locally important buildings and features ?

I also welcome the comprehensive characterisation of the village shown in the Guidelines, which appeared (erroneously) to me to be missing from the evidence base for the Plan. This together with the guidelines for new developments and Policy LF-3 of the Plan should help ensure that new development retains (or reinforces) historical character and that that character is generally maintained and enhanced.

Nevertheless, a detailed Character Appraisal (and, ideally, a Management Plan) for the Conservation Area would be helpful to understand, and therefore conserve and enhance, its special architectural and historic interest. I am pleased to note that Drayton 2020 also considers that this would be useful. I understand that you would prefer the District Council to undertake this work, but it is something that the Parish Council can commission or the local community can undertake.

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English Heritage has produced guidance on Conservation Areas: <http://www.english-heritage.org.uk/publications/understanding-place-conservation-area/understanding-place-ca-designation-appraisal-management.pdf>. This document also contains a link to the Oxford Character Assessment Toolkit. Just yesterday I learnt that three community groups in Southampton had undertaken Conservation Area Character Appraisals with the support of Southampton City Council.

The Sustainability Appraisal Final Report does not contain any additional information on the character of the village or Conservation Area but as I note above, this is adequately covered by the Design Guidelines. I note that it does not mention (on page 23) paragraphs 137 or 138 of the NPPF, which refer to development within Conservation Areas and is therefore relevant to the Manor Farm site.

I take it that this is simply an omission if Drayton2020 considers that the proposed development on this site abides by the policies and principles set out in these paragraphs (particularly that it would not result in the loss of an element that makes a positive contribution to the significance of the Conservation Area).

The Site Option Appraisal states a rating of "Green" for this site, but the Summary table shows it as an amber rating, which I consider more appropriate.

As regards the proposed development sites identified in the Plan, I note that Manor Farm has been the subject of detailed discussions with developers and the District Council over the past two years. I have sought to get in touch with Sarah Oborn to confirm that she has no concerns in principle with the development of this site and am awaiting a reply. If she confirms that the allocation is compliant with Policy HE1 of the Vale of White Horse Local Plan 2011 (and thus with Policy P-LF4 of the Neighbourhood Plan), I will be satisfied as to the suitability, in principle, of this site for development in respect of the historic environment.

I note that discussions have also been taking place regarding the land south of High Street and welcome both Drayton2020's attention to the design aspects and the archaeological survey. My previous comments still apply. For land north of Barrow Road, again I note the discussions that have been taking place and welcome the attention being paid to the layout. I still need to say, however, that 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.

I have previously expressed the 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, and to inform the nature of any development considered acceptable in principle.

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However, you have explained to me the comprehensive characterisation work Drayton2020 has undertaken with the Design Council, Meredith Evans, Adams Habermehl and Pegasus Design consultants, and that this information has all been fed into the Design Guide and other documents and evidence.

I am more than satisfied that this work, notwithstanding the lack of a Conservation Area Character Appraisal (subject to Sarah Oborn's confirmation of the acceptability of the allocation of the Manor Farm site in terms of its impact on the Conservation Area) provides an adequate evidence base for the Neighbourhood Plan.

I hope these comments are helpful. Once again, I apologise for not having fully recognised the work that Drayton2020 has undertaken to inform your Neighbourhood Plan.

Yours sincerely,



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