



**OXFORDSHIRE
COUNTY COUNCIL**

Date: 30 July 2014

**Environment & Economy
Speedwell House
Speedwell Street
Oxford
OX1 1NE**

David Perrow
Clerk – Drayton Parish Council

**Sue Scane – Director for
Environment & Economy**

Dear David,

Re: Drayton Neighbourhood Plan – Pre-submission Consultation Version 2

Thank you for your email dated 16 June inviting comments on Drayton Parish Council's draft Neighbourhood Plan for Drayton.

This is the second version of the pre-submission document that the county council has commented on and many of the same concerns remain as they appear not have been addressed in this latest publication. Therefore I attach the previous response made in February as Annex 1 for ease of reference.

Please note however that the policies contained within the new document may not have the same policy number as the old document (as referred in Annex 1). Furthermore I have the following new comments or factual corrections below.

Contributions to Infrastructure

Infrastructure requirements and aspirations identified need to be deliverable directly or indirectly through development. Other than existing developer contributions secured it is very unlikely funding over and above that secured through future developer contributions will be available.

Therefore the Plan must carefully consider what infrastructure it can deliver and thought must be given to the level of contributions that can reasonably be expected from the scale of development planned for Drayton.

Drayton2020: This is understood. As OCC will be aware, there have already been extensive discussions between OCC Highways, the three main potential developers and Drayton2020 representatives about a local traffic scheme for Drayton.

The Neighbourhood Plan covers the next 15 years (2015 – 2030), which is the course of three Parliaments and County Councils, and an entire business cycle. Drayton2020 is seeking to plan for this entire period, and to reflect in the Plan the wishes of its residents expressed in public meetings and through the village survey. If local aspirations cannot be delivered by current local and national government policy then electors will have

three opportunities at the ballot box to align national and local policies and funding with their local aspirations. This is the local democratic shift, as outlined in the Localism Act. There are also, under the Act and subsequent subsidiary legislation, opportunities for parish councils to take over functions from higher levels of local government if needs be, and to adopt wider powers through the Power of Competence to undertake and fund any legal activities supported by its parishioners.

We have the following specific comments to make related to county council infrastructure:

- Policy P-H3 (Contributions) – The County Council will need to be included in any formal agreements when securing contributions from new development towards county owned infrastructure or services it is responsible for. Securing developer funding requires robust evidence. The Local Plan's Infrastructure Delivery Plan may be the basis of CIL (the district council can provide more information) and therefore will need to acknowledge the Drayton Neighbourhood Plan. If CIL is not adopted, or not adopted before planning applications for sites in Drayton are submitted, a robust mechanism needs to be in place to secure developer funding.

Drayton2020: Discussions have been taking place with VWHDC, who would be responsible for the s106 negotiations with Drayton developers, and who would decide when, and at what level CIL would be introduced. Councillor Richard Webber (County/District and Parish Councillor for Drayton) has been involved in these discussions. It is agreed that s106 meetings involving Drayton developments will be convened by VWHDC and involve both the County Council and Drayton Parish Council, so that the Drayton NDP aspirations can be realised.

- Policy P-H4 (Use of Contributions) and Annex E - The list and annex needs to recognise that contributions will also be required for county council owned and managed infrastructure such as school places, highways mitigation and other services.

Drayton2020: A copy of Annex E was emailed to Amanda Jacobs on 19th May 2014 asking for OCC feedback and OCC contributions to this schedule. Drayton2020 was disappointed that no such feedback was received, **but would welcome OCC response to this request, even at this late stage.**

Transport

Community Policy C-LF7: Signage Reduction adheres to Oxfordshire County Council Policy RE3 “Oxfordshire County Council will work with partners to improve the public realm and de-clutter the street environment”. At a practical level there may be resource implications in delivering this policy as it cannot be met by developer funding and there is no other known sources available.

Drayton2020: There have been several meetings about a comprehensive traffic calming scheme for Drayton involving OCC, Drayton2020 and Nigel Millington, representing the three major developers. We understand that an outline scheme has been approved by OCC Highways, and this is included in the Drayton Plan. The developers are now having this costed. It is agreed in principle by the three developers that they will fund this scheme, taking care of the length of the main village road nearest their respective developments, alongside the highway changes that will be necessary to engineer access to their development. Any unfunded features of the scheme may have to await later public funding or grants from other sources. This is understood by Drayton2020. Until costs are obtained for the proposed scheme, Drayton2020 has taken this as far as is possible at the present time. Our understanding is that this early engagement with OCC on highway planning has not been achieved before by any neighbourhood plan in the County, and it would be helpful if OCC could acknowledge this fact in their final response to the Drayton2020 Plan when this consultation is launched by VWHDC in September.

Community Policy C-T1: Traffic Speed Reduction and Community Policy C-T2: Harmonisation of Speed Limits and Community Policy C-T5: HGV Weight Restrictions. The aspiration for 20mph speed limit throughout the village, permanent speed cameras for potential accident danger spots in the village, revised speed limits and weight limits may not adhere to the policy or criteria of the governing/implementing authorities (although over the life of the Neighbourhood Plan these may change).

Drayton2020: A 20mph speed limit and speed cameras are a strong preference expressed by the Drayton community when consulted on this issue in the village questionnaire. It may well be that these measures will prove unnecessary if the alternative traffic calming scheme is implemented. It is intended to run a session in October in Drayton to explain the proposed traffic calming scheme to Drayton villagers. **OCC input to this programme would be much appreciated.**

It is understood that OCC do not favour a 20mph limit on the Abingdon/Steventon Road in Drayton since although this highway (the former A34) was ‘de-trunked’ when the A34 Abingdon by-pass was built, and safety measures such as pedestrian crossings were deliberately removed to restore this to a rural ‘B’ road, OCC now regard this as a relief road for the A34 when the bypass is congested. However, this does not apply to the High Street, Drayton, which could be a 20mph under current OCC policy, we understand. We also note that within the last 5 years OCC has changed its stance on 20mph limits and their implementation: a 20mph limit was introduced as a blanket measure in Oxford – in what is now admitted to be some quite inappropriate locations. In Abingdon, a 20mph limit was proposed for the town centre, but was dropped due to lack of funding – and local opposition. As acknowledged above, the Drayton2020 NDP is a 15 year plan, and policy and practice could change within the plan period so that the

villagers' aspirations could be realised. Drayton has the democratic right to express its view to OCC in these matters.

Comments on Identified Housing Sites

Please refer to our previous comments on identified housing sites as they still remain however we would like to add the following which were provided to the Vale of White Horse in response to their recent draft Local Plan Part One (LPP1) consultation published in February of this year.

These comments relate to the site known as South of Drayton in the LPP1 or South of High Street in the draft Drayton neighbourhood plan.

South Drayton (Site for up to 200 dwellings)

- Could be expected to generate 1000 veh trips per day, 100 trips in peak hour
- Strategic access to A34 south is available via Steventon Road, through village and to A4130. Local mitigation (e.g. footways, crossing points, traffic management, etc.) may be required within village and beyond. Strategic access to A34 north is available only via Abingdon, Drayton Road and A415.
- This route is already heavily congested during peak times and would not cope with increased traffic without mitigation.
- Contributions should be secured towards future strategic infrastructure improvement for Abingdon. PT contributions would be required.

Drayton2020: These comments are noted. Traffic management is the responsibility of OCC as the highways authority, and the County Council will need to advise the VWHDC, as the planning authority, of constraints and required mitigation measures when any planning applications are received. For its part, Drayton2020 has opposed the development of the South of High Street site as a VWHDC Strategic Site for up to 200 houses. In discussion with the developers the development proposed is now for circa 130 houses, not the 200 favoured by VWHDC, so traffic impact will be reduced from the Local Plan figures. The nature of the development has also been changed from that proposed originally so that it will now include housing for the elderly, who will have lower car ownership and a different pattern of use. The developers are currently undertaking analysis of a traffic study in Drayton and Drayton2020 is urging that this be published in time for the Examination of the Drayton NDP from 1st September onwards. Local traffic mitigation is planned in the Drayton traffic management scheme already discussed with OCC and referred to above. This is intended to slow traffic (hence the proposal for 20 mph limits and speed cameras) and to give pedestrians and cyclists a safer environment than at present, with priority over through traffic.

Cumulative Impact

It should be noted that there is an application for 159 dwellings to the East of Drayton Road to the south of Abingdon – planning reference P14/V1196/FUL. This site lies to the north of Drayton and could potentially create a cumulative traffic impact on Drayton.

Drayton2020: This is noted. Drayton Parish Council opposes this development in South Abingdon since it may compromise the Drayton NDP delivery.

Cumulative traffic impact is a matter for OCC. In addition to the proposed development in South Abingdon there are also approved and proposed housing schemes in Steventon, Sutton Courtenay and Milton which will affect Drayton and local traffic. Drayton2020 and Drayton residents would welcome a transport infrastructure plan from OCC, the Highways Agency/Government and VWHDC to tackle the deficit in local

highways capacity, particularly the A34 over-capacity issue. Apart from 'pinch point' funding for the Milton interchange there does not seem to be a plan or funding in place to address these cumulative impacts. A scheme to improve the Ock Bridge, more sliproads on/off the A34 and a widening/hard shoulder for the A34 are urgently needed. This is beyond the scope of the Drayton2020 Plan to deliver, but OCC should note that Drayton 2020 has (a) opposed the re-opening of the Drayton A34 slip road; (b) suggested that the A34 land at rear of Lockway is not developed for housing, but is reserved for a future widening of the A34 in Drayton; (c) supported the creation of cycle paths from Abingdon through Drayton to Milton; (d) supported improvements to local bus services and RTI services at bus stops. This is all in line with the draft OCC Transport Strategy.

Education

The plan mentions in paragraph 70 (p27) a guaranteed school place for every child. It is not realistic to guarantee a place at the school for every child, though it can of course be an objective to try. Our full response from 27 February 2104 remains.

Drayton2020: Drayton2020 is disappointed that OCC Education officers have been unable to meet with its representatives and School Governors to discuss and cost plans to expand Drayton Community School and to deal with the future of Drayton Pre-School. A meeting has been sought over several months past, but may now not take place until September/October. Places could be guaranteed for Drayton primary school children if plans and funding are put in place early enough, but Drayton2020 notes that in respect of Drayton Community School the OCC website Pupil Place Plan <https://www.oxfordshire.gov.uk/cms/sites/default/files/folders/documents/childreducationandfamilies/educationandlearning/schools/ourworkwithschools/pupilplaceplan/pupilplaceplan.pdf> shows only 39 houses planned for Drayton from 2014 to 2020. This information, and its underlying methodological assumptions, ignores both the emerging VWHDC Local Plan and the Drayton NDP (where 250 houses may well be built by 2020), and urgently needs revision as a planning tool.

Property

The County Council owns two large sites within the Plan Area (see attached plans Annex 2 and 3) plus several smaller areas (retained for road widening) however none of these are directly affected by the Neighbourhood Plan proposals.

Drayton2020: Thank you for these site plans. The sites are unaffected by anything proposed in the Drayton Plan

Countryside

The policies P-WP2 (connected development), C-WP8 (Upgrade local footpaths) and C-WP9 (develop a parish pathway promoted route) are supported as they meet the aims of the Oxfordshire Rights of Way Improvement Plan. The comments about some paths being in poor condition are noted. The County Council will work with the local community to improve access where resources can be found and where opportunities arise. The County Council has the statutory duty to assert, protect and maintain public rights of way and it values the work that communities and volunteers to add to this maintenance and make the area better for residents and visitors. More information on improving rights of way can be found at www.oxfordshire.gov.uk/countrysideaccess. The website includes an online map which can be used to report problems too (www.oxfordshire.gov.uk/countrysidemap).

Drayton2020 met with OCC Countryside Services Officer Mark Sumner on 20th September 2013, and a walk round the village footpaths was conducted looking at how the paths may be better way marked (which OCC undertook to do at their expense), the surfaces restored, made good and widened for those using mobility scooters, and a footpath map produced. Mark Sumner was able to advise on the removal of obstacles on the current footpaths (such as railings/stiles), and on the type of surface which should be laid. He was unable to advise us on costs of this work, and costings have therefore had to be estimated by Drayton2020. Drayton Parish Council is proposing to the Drayton Millennium Green Trust that it fund a pilot project on footpaths across the Millennium Green, so that the method can be tried and proper per metre costings obtained for the Drayton footpath network as a whole.

The Parish Council is aware of how to report current footpath issues. This system of contact with Mark Sumner is used on a regular basis.

Archaeology

The county urges that the policy mentioned in the previous comments is included in the plan.

Drayton2020: The recommended English Heritage policy will be included in the next Submission copy of the Drayton2020 NDP. There has already been extensive research on the archaeology of Drayton, including the Anglo-Saxon palace complex, the Drayton Cursus and a detailed archaeological study of the Manor Farm site. Archaeological surveys have also been undertaken at both the South of High Street site and the Barrow Road site, but are yet to be published. The County Archaeologist has been consulted by developers and by Drayton2020 over the Barrow Road site in particular. The results of the considerable work undertaken by Drayton2020 with respect to the history and archaeology of the village are reported in the Plan, its appendices (particularly the Design Guide), and the Sustainability Appraisal which are all available on the Drayton2020 website at: <http://www.drayton-near-abingdon.org/drayton2020/> with the underlying evidence at: <http://www.drayton-near-abingdon.org/drayton2020/resources/>

If you have any questions on our response to this consultation, please contact me.
Yours sincerely,

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