Date: 30 July 2014

David Perrow
Clerk – Drayton Parish Council



Environment & Economy Speedwell House Speedwell Street Oxford OX1 1NE

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.

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.

 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.

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.

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).

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.

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.

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 by an objective to try. Our full response from 27 February 2104 remains.

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.

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/countrysideamap).

Archaeology

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

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

Yours sincerely,

Amanda

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CC – Katherine Macdonald – Vale of White Horse District Council