

1st August 2014
Representation into the Drayton
Neighbourhood Plan

Mr. David Perrow
Drayton Parish Clerk
c/o 12 Loddon Close
Abingdon
Oxon
OX14 3TB

Dear Mr. Perrow

DRAYTON 2020 NEIGHBOURHOOD DEVELOPMENT PLAN LAND AT SOUTH OF HIGH STREET, DRAYT

Savills has been instructed by Bloor Homes to submit representations on the Drayton 2020 Neighbourhood Plan. Bloor Homes has an option agreement with the landowners at South of High Street (reference DRAY07 in the Neighbourhood Plan) and have been committed to working with Drayton 2020 proactively in the delivery of a high quality housing development, in parallel with the Vale's own Local Plan preparation. This representation follows submissions previously made by Savills on behalf of Bloor Homes to the previous consultation, in a letter dated 21st February 2014.

The Drayton Neighbourhood Development Plan (NHP) is now at an advanced stage, with this particular consultation on the pre-submission draft representing the final consultation prior to the submission of the final NHP. At this stage it is therefore relevant to consider whether the NHP is in accordance with the basic conditions that are required to be met if the NHP is to proceed to referendum. These basic conditions are set out in paragraph 61F of Schedule 9 of the Localism Act 2011, and which are listed in paragraph 065 of National Planning Practice Guidance (NPPG).

Assessment against the Basic Conditions

Basic Condition (a): Having Regard to National Planning Policies

As listed in paragraph 070 of the NPPG, paragraph 16 of the National Planning Policy Framework (NPPF) requires that Neighbourhood Plans support the strategic development needs of Local Plans, including policies for housing and economic development. Paragraph 184 of the NPPF states that Neighbourhood Plans should not promote less development than set out in the Local Plan.

Bloor Homes welcomes the continued support for the land to the South of High Street (identified for circa 140 homes within the NHP) by the Drayton2020 group as one which can contribute to meeting the housing demands of Drayton. The NHP proposes three sites for new housing providing circa 250 new homes and thus the village is pro-active in considering allocations that are in excess of the those within the emerging Local Plan, an approach which is welcomed by Bloor Homes.

Basic Conditions (b) and (c): Having regard to the Listed Buildings and Conservation Areas

The NHP identifies listed buildings and defines the Conservation Area boundary in line with these NPPG conditions. These basic conditions require that policies in the NHP do not weaken the statutory protections for listed buildings and conservation areas. The NHP proposes 2 policies to ensure accordance with the basic conditions:

(i) Policy P-LF3 (Building Design Guidance) requires proposals to take account of Drayton Parish's own Design Guidance presented alongside the consultation document. This policy is to be read in accordance with;

(ii) Policies P-LF4 (Conservation Area) requires proposals to maintain and enhance the character of the area.

Bloor Homes considers that all new development within Drayton, including on land to the South of High Street, should be designed to conserve and enhance the setting of listed buildings and Conservation Areas. Character Areas are defined in the accompanying Design Guide and design principles are set out to guidance new development. This Design Guide is welcomed as the design parameters provide a greater level of certainty for future developments, particularly with regards to the land to the South of High Street which is adjacent to the Conservation Area (identified as Character Area A in the Design Guide). The NHP has therefore had due consideration to basic conditions (b) and (c) with regards to listed buildings and Conservation Areas.

Drayton2020: These comments are Noted. No Change to Plan Made

Basic Condition (d): Contributing to Sustainable Development

Paragraph 14 of the NPPF sets out a powerful presumption in favour of sustainable development. NHP's must therefore demonstrate that they contribute to improvements in environmental, economic and social conditions. Paragraph 16 of the NPPF sets out the implications of this presumption on the production of NHPs and how they can address these. The Drayton NHP is accompanied by a sustainability appraisal which clearly states how the NHP has taken into consideration strategic policies of the emerging Local Plan (a requirement of NPPF paragraph 16), including those for housing and economic development. The NHP is clear in its approach to site selection and the methodology for arriving at the preferred sites is transparent in the sustainability appraisal.

Bloor Homes welcomes the approach of the Drayton2020 group in this regard, and consider that the requirements on paragraph 16 of the NPPF are met. Therefore the NHP demonstrates a presumption in favour of sustainable development and it is therefore compliant with NPPF paragraph 14.

Drayton2020: These comments are Noted. No Change to Plan Made

Basic Condition (e): Conformity with Strategic Policies of the Development Plan

During the previous round of consultation the District Council advised that the NHP should take account of the policies of the emerging Local Plan. The accompanying sustainability appraisal sets out, on page 22, the Strategic Objectives of the emerging Local Plan that the NHP makes a contribution to. Bloor Homes welcomes the approach of including the land to the South of High Street within the NHP, which is in line with emerging Local Plan policy.

Drayton2020: These comments are Noted. No Change to Plan Made

Basic Condition (f): Conformity with EU Obligations

As required by paragraph 078 of the NPPG, this pre-submission NHP appears to have considered the effects on the environment of the allocated sites and the proposed policies, within the accompanying sustainability appraisal. This is welcomed by Bloor Homes.

Drayton2020: These comments are Noted. No Change to Plan Made

Policies of the Neighbourhood Plan

The following section provides comments on specific policies proposed in the pre-submission NHP. Overall Bloor Homes are pleased that many of the comments made during the previous consultation have been incorporated into this pre-submission document. The following lists our remaining observations of the proposed policies of the NHP.

Drayton2020: These comments are Noted. No Change to Plan Made

☐ Planning Policy P-H1: Affordable Housing

The provision of affordable housing within Drayton and South of High Street is supported where it accords with the Development and it can be demonstrated that it is viable to do so. Bloor Homes supports the approach of policy P-H1 to integrate affordable housing fully into the development as a whole.

☐ Planning Policy P-H2: Scale of Development and Site Allocation

Bloor Homes is pleased that the proposed 10% cap has been removed from the policy. This meets the objectives of basic conditions (a) and (e). However the site boundary, or red line area, is not well defined and Figure 9 does not show clearly the site and the surrounding area. The plan should show the definitive site boundary, including means of access, at a recognisable scale that also clearly shows the context of the site within the NHP submitted for examination. This is also applicable to Figure 8 (Manor Farm) and Figure 10 (North of Barrow Road).

Drayton2020: These comments are Noted. The Plan boundaries have been examined and possible improvements to clarity considered. However, Plans derive from VWHDC, not Drayton NDP

We recommend that housing numbers are included within the policy text to provide certainty to Drayton village and to future developers that housing can be provided as described in the accompanying text of the NHP.

Drayton2020: These comments are Noted. Number of units have not been included in the Plan since this can be misleading – a ‘house’ can be a 1 to 5 bedroom unit, so developers’ can increase numbers to accommodate more households without changing housing density. The Drayton2020 Plan encourages smaller, affordable houses, so fewer 5 bedroom and more 1-2 bedroom units can be in line with NDP policies.: What matters is the number of people (and cars) added to the village, not just the number of units/houses. 250 maximum is the overall guide increase in households given in the Plan.

☐ Planning Policy P-H3: Contributions

☐ Planning Policy P-H4: Use of Contributions

We are satisfied with the approach prescribed in Policy P-H3. Those contributions must, however, be necessary and directly related to the proposal, and appropriate in scale and kind to be consistent with paragraph 204 of the NPPF. We are concerned that Policy P-H4 may be undeliverable in its current form. There is no provision within the NPPF or the basic conditions set out in the NPPG for the NHP to allocate developer contributions to identified projects. Instead it would be more appropriate for the NHP to propose that contributions are allocated to those projects within the background text of the document. The District Council is at an early stage in the preparation of a Community Infrastructure Levy (CIL) charging schedule. The calculations set out in Annex E are therefore not currently substantiated.

Drayton2020: Annex E is a draft, and this has now been revised to make this more obvious. The NDP is not intended to offer a final s106 settlement, and in the event may be overtaken by CIL, to which different rules apply than s106. The relevant policies have been re-examined and amended where this was thought necessary.

☐ Planning Policy P-LF3: Building Design Guidance

Bloor Homes welcomes the production of a Design Guide (Annex D) to guide development on Land to the South High Street.

We also consider that to take this NHP forward, a basic assessment of housing needs within the Drayton NHP area would be beneficial prior to submission for examination. If you require any further information at this stage please do not hesitate to contact me on 01865 269119.

Drayton2020: A full Housing Needs Assessment is for the VWHDC to conduct on a District or Sub District level. Drayton Parish Council conducted its own Housing Needs Survey in 2012 and this has informed the Drayton NDP

Yours sincerely
James Stewart-Irvine MSc MRTPI
Associate Planner

cc. Bloor Homes