

DRAYTON NEIGHBOURHOOD DEVELOPMENT PLAN (NDP)

2014-2031

Pre-Submission Consultation Copy

Version 2 - June 2014

Comments and Observations

Having had no feedback to either the 36 signatory letter of concern (defined by Drayton 2020 as a “petition”) or observation submitted by us separately on the 1st version of this document, we are resisting the temptation of reiterating them as there is no indication that anything has changed or been “taken on board” other than paragraph numbering duplication and some grammatical errors have been eliminated. Our main points of concern in the current document, as they arise in going through it, are:

1. Unfortunately, paragraph numbering doesn’t extend to the Foreword. In the penultimate paragraph (p6) of his contribution, the Chairman identifies four members of the Steering Group. It would be far more appropriate to quote the total membership, their qualification for serving, experience, relationships and residential location.
2. It is not clear whether the Clerk of Drayton Parish Council in his role as a member of the 2020 Steering Group(SG) is purely administrative as it is for the Parish Council. As the only remunerated member of the Group, this matter should be clarified.
3. The 2nd para of the Parish Council Chairman’s observations (p6), he quotes: “**Katherine Pearce**, a Senior Planner at the Vale, **has been a regular attender at Steering Group Meetings**, and”. It would be more helpful in giving a more accurate indication of fact to state the actual number of meetings attended by members of the Vale Planning Dept., thus avoiding sweeping, subjective generalisations that may give a different impression from that which actually occurred. Tony Croucher has attended 11 SG meetings since November 2013 and Katherine Pearce was present at only one of them.
4. In the last para (P6/7) of the Chairman’s observations it should be made clear that the Parish Clerk is not a village resident; as currently worded it could be interpreted that he is.
5. Under the heading NDP PREPARATION, para14 (p10), another sweeping, subjective generalisation requires objective support beyond “...., as validated by Parishioners,” .
6. Under the heading COMMUNITY ENGAGEMENT, para15 (p11), the 7th bullet point: “**Meetings with major landowners were held on several occasions starting in February 2013.**” Another generalisation which gives a distorted impression of fact: to date, the only meeting that has been held regarding Barrow Road site was on 19 May 2014 and at which resident attendance was restricted to four residents from Abingdon Road*. A further meeting is currently being arranged but with attendance restricted by 2020SG to two residents from Abingdon Road*.
7. In the SWOT ANALYSIS, (p15), do small and large scale developments need quantifying? In Weaknesses, what is the large number of small scale developments? How many dwellings did not qualify for Section 106 contributions as a result?
8. DRAYTON 2020 VISION, para35 (p16), states: “**The Drayton NDP intends that any future development adds to the quality of life of all Drayton’s residents.**” This is absolutely impossible; substitute “**most**” for “**all**”. At least be honest!
9. Under the heading LOOK & FEEL, para45 (p18), other than playing sport, how does the Barrow Road development fulfil the aspiration of this objective?
10. Under the same heading, para46 (p18), 2nd bullet point: Barrow Road development **will** extend beyond “the current ‘built form’ ... boundary of the village” and **will** extend “further ribbon development along village main roads towards neighbouring settlements”. This observation applies exactly in the same way to PLANNING POLICY P-LF2: BOUNDED DEVELOPMENT and para49, (both p20).

11. Under the heading WORK & PLAY, para58 (p23), says: “ **there are almost forty businesses in Drayton,**”. Why not say exactly how many? Is it 35, 36, 37, 38 or 39? Perhaps the number isn't known!
12. Under the same heading, para59 (p23) says “**The existing Village Hall provides a wide variety of indoor social activities.**” A variety may be, but, isn't *wide* a little wide of the mark?
13. Also, reference para59 (p23), with regard to the present single football pitch, how many teams wishing to use it are unable to use it at present? How many players are there and how many of them are village residents?
14. The remainder of pages 23 – 32, proscribing various other policy statements supported by generally bland paragraphs. The critical feature of the NDP should be their consistent and complete application. This is where the document fails, as evidenced by the following comments.
15. That takes us to HOUSING PROVISION and the eight site assessment criteria (paras92-100, pages32-35). Again, it is critically important that these criteria are consistently applied. Unfortunately, in its' present form, Version 2 of the Consultation Document does not succeed in so doing as will be demonstrated below.
16. Firstly, we come to Figure 7 on p37. The map shows there to be a listed building at or opposite 113 Abingdon Road. Whilst not of critical importance, this is not believed to be accurate and casts doubt on the accuracy of the remainder those buildings indicated.
17. Table 5: 'Traffic Light' Scoring, p39: Whilst Version 2 containing additional sites, differently designated from Version 1, the analysis has been reassessed and, surprise, surprise comes to exactly the same conclusion as presented in Version 1! Para 111, immediately following, refers to the detailed site analysis being “**included in the Sustainability Appraisal published alongside the DNP**”. Sadly, it is not currently published. Consequently, comment is somewhat difficult.
18. Para111- 149, (pages 40-47), mostly acceptable statements providing potential for consistent application. However, para143 states “the site is not a flood risk zone and is not susceptible to flooding”. Why is the drainage ditch running along the back of the gardens in Abingdon Road sometimes containing up to 0.5m of water and why did the land owner install a land drain completely across the whole site 18-24 months ago?
19. Annex B: Whilst there has quite clearly been a very considerable devotion of time to the work and activities of Drayton 2020 SG, there is also clearly potential for error in the estimate of time spent. Is the information auditable? There is potential for double counting in the figures as presented: particularly in the cases of the Chairman and Clerk.
20. Annex F: DETAILED SITE ASSESSMENT TABLE – Includes Barrow Road Site (part of DRAY02):
 - 2 Have low impact on traffic flows states: “Vehicles heading north **need** not pass through the village”. They **won't!**
 - 4 Have low impact on neighbours and green space in village states: “discussion have taken place as to ways in which the impact of development might be mitigated.” The only meeting held so far, limited to only four residents, but falsely claimed by the developer to be a Workshop, produced a totally unacceptable proposal. A further proposal has yet to be discussed at a meeting, yet to be arranged, which 2020SG has insisted should be attended by only three residents!
 - 6 Be subject to low traffic noise states: “A34 is in a cutting along this stretch”. This is not particularly relevant as the cutting is shallow and short as well as the prevailing wind coming from the more southerly, open section. Presumably the noise survey, currently being undertaken, will provide information for all parts of the Barrow Road site?

