

Drayton Neighbourhood Plan Pre-submission Comments from Vale of White Horse District Council

Main Document

Drayton 2020 has already put in a lot of hard work in producing the document and in working proactively with developers. The substantive points made in the last consultation have been addressed so below are some more detailed comments relating to the text. The document is reading really well and would benefit from some photos to break up the text and to give a visual representation of the parish.

Page 10	Suggest changing the yellow box 'Inspection' to 'Examination'.
Para 15, last bullet	Presumably this is June 2014?
Para 34	This should refer to 'housing affordability ratio', rather than 'Affordable Housing Ratio'. Also, reference where these figures came from.
Para 42	Explain here that the planning policies are the ones that relate to the development and use of land and will be formally examined and will be put to vote at the referendum.
Page 15	"Possibility that developments could make village community groups less sustainable" – How would development make community groups less sustainable? More people should hopefully support community groups, and thus, their sustainability.
Page 16	The 'Look and Feel' objective seeks a cohesive and coherent look for the village and at the same time a varied built environment consistent with the existing character. These two are slightly at odds.
P-WP1	Rather than major development sites, do you mean the three sites allocated in the Neighbourhood Plan? Because sites of say, 15 dwellings, won't have enough space to provide sports and recreational facilities on site but would constitute major development.
Page 30/31	Our CIL officer has suggested some text you could insert somewhere here to explain S106 and CIL: <i>Where new development is likely to have an impact on a community, developers can be required to provide community facilities and infrastructure or to pay for their provision. This is usually managed through Section 106 Agreements or, upon adoption by Vale of White Horse District Council, through the Community Infrastructure Levy (CIL). Contributions sought through Section 106 Agreements are required to meet the</i>

	<p><i>following tests:</i></p> <ul style="list-style-type: none"> • <i>they are necessary to make the development acceptable in Planning terms</i> • <i>they are directly related to the development</i> • <i>they are fairly and reasonably related in scale and kind to the development.</i> <p><i>Infrastructure deemed necessary to support development has been included in Annex E to this plan. Upon adoption of CIL the Parish Council will receive 25% of the CIL receipts generated within the Parish to spend on infrastructure. Infrastructure items identified within the Annex E may be funded by the Parish Council from the CIL local proportion.</i></p> <p>As we discussed at our recent meeting, before CIL is adopted, we will need to negotiate with developers on a site by site basis for what they contribute towards, which will include county and district infrastructure such as primary school places. This will be based on the viability of the scheme and whether the infrastructure requirements meet with three legal tests set out above. The list in Annex E provides a clear set of priorities for the parish council and will make those negotiations easier as you say in Policy P-H3, for the county, district and parish councils to agree together with the developers.</p> <p>With regard to CIL, we will be working with town and parish councils to help them better understand the CIL process and also to support them in making the best decisions in spending any acquired CIL monies.</p>
Para 82	It won't be possible for all contributions from development to go to the village. There will be cases where we seek or spend CIL/Section 106 on infrastructure outside of the village such as secondary education and transport.
Site Descriptions and Requirements	As two of the three allocated sites are within/adjacent to the Conservation Area and a variety of listed buildings there should be a section on how you would like the developments to take account of these.
C-T3	This policy could be included as a planning policy. This is the sort of information that should be explored in a Travel Plan, which are required for all major applications. Suggest the words 'will be' rather than 'should be'.
C-WP5	This could be turned into a planning policy by changing to, for example, "Planning permission will be granted to refurbish, extend or replace the existing village hall on Lockway, provided the development is in accordance with other policies in the Neighbourhood Plan or Local Plan."
P-WP7	Not all housing development will be able to provide for play areas on site as some will not have enough space. Also, is it

	<p>necessary/reasonable for every site to have play facilities as some sites may be close to existing facilities?</p> <p>Is this a planning policy or a community policy? The title suggests planning and the second sentence reads as a planning policy (though for the reasons mentioned above, not a robust one). The first sentence is more of a community policy. Is the second sentence necessary for the policy as it seems to be covered by Policy P-WP1.</p>
Para 150	Make clear here that these policies do are not to be examined as part of the Neighbourhood Plan because they do not relate to the development and use of land.

Design Guide

The Vale Design Officer said that this provides a useful character appraisal of the village and offered a few bits of advice:

- it would be helpful to have had a couple of additional plans to assist with the better understanding of the evolution of the village eg its location in the wider movement network, landscape setting and topography for sake of completeness. A map identifying the conservation area boundary and location of Listed Buildings would also be beneficial, as some designated assets are potentially affected by the preferred housing sites.
- Principle 6.2.a refers to recent modern development that has open front curtilages, which create a sense of space. This, however, can be a very suburban approach if the landscaping framework is not sufficiently robust and in general we would encourage greater definition of the curtilages to enclose the street.
- Agree that verges and street trees add considerably to the character of Drayton and that these features should be incorporated into new street design to reinforce sense of place.
- A key aim is to knit the village together but the volume of traffic through the village on the main road (Abingdon Road?) creates something of a barrier. A vision for the road might assist in this: development of sites in the village could potentially exacerbate the issue if an incremental engineering approach were adopted whereas coordinated tree planting, changes in surface materials etc could help enhance local character and act as traffic calming.
- The text assumes a good knowledge of Drayton with reference to specific areas; a map showing Sutton Wick, the Millennium Green etc. would be useful.

With regard to the character areas, you could mention that there is timber boarding on the dwellings in Sutton Wick. For Character Area C, the tiles will be concrete rather than clay or slate, which you tend to find on older properties.

Sustainability Appraisal

The SA still doesn't meet all of the regulations. It is imperative that it does. The only Neighbourhood Plan to fail at examination so far was because of the SEA.

Table 1 below splits the regulations out into their component parts and then assesses the extent to which the regulation has been met in the Scoping Report and the SA using a RAG status.

Table 2 provides some more specific comments on the text in the SA.

Table 1

1	An outline of the contents and main objective of the plan	These are set out in the Scoping Report but it needs updating to reflect what is in the Neighbourhood Plan.
	An outline of the plan's relationship with other relevant plans and programmes	This was done in the Scoping Report. However, some of the sections in the published Scoping Report still say 'Input required', so the document is incomplete. Also since the Scoping Report was published the National Planning Practice Guidance has been released.
2	The relevant aspects of the current state of the environment	This is captured in Section 4.1 Base Information of the Scoping Report.
	The likely evolution thereof without implementation of the plan or programme.	This has not be captured anywhere in the Scoping Report or the SA. There needs to be an assessment of how the relevant aspects referred to in Section 4.1 would evolve if the Neighbourhood Plan were not implemented. This needn't be long but it needs to be covered somewhere.
3	The environmental characteristics of areas likely to be significantly affected.	Use the assessment in Section 4.1 to highlight the key environmental issues that you will take through to the Sustainability Framework. This is captured in Section 4.2 but the key issues listed here do not link back to, and are not reflective of, the assessment of the baseline e.g. the issue around road traffic, the Conservation Area and listed buildings etc.
4	Any existing environmental problems which are relevant to the plan or programme	State in the 'Nature Conservation' section that there are no particular environmental problems in the parish

	including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to the Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive.	involving the conservation of wild birds. Also state that a screening opinion for Habitat Regulations Assessment Screening was carried out by the District Council as part of the SEA Screening Opinion and this found that the plan would not require an Appropriate Assessment.
5	The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	This is captured in Section 4.1 Base Information of the Scoping Report.
6	The likely significant effects on the environment, including short, medium and long-term effects	Check reference has been made to these where relevant in Section 4.1.
	The likely significant effects on the environment, including permanent and temporary effects	Check reference has been made to these where relevant in Section 4.1.
	The likely significant effects on the environment, including positive and negative effects	Check reference has been made to these where relevant in Section 4.1.
	The likely significant effects on the environment, including secondary	Check reference has been made to these where relevant in Section 4.1.
	The likely significant effects on the environment, including secondary, cumulative and synergistic effects	Check reference has been made to these where relevant in Section 4.1.
	On issues such as biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage, including architectural and archaeological heritage; landscape; and the inter-relationship between the issues referred to above.	No reference is made to the interrelationships between any of these issues. Check whether there is anything in particular that needs to be picked up.
7	The measures envisaged to prevent, reduce and as fully	Site Option Appraisal table suggests ways of mitigating any amber

	as possible offset any significant adverse effects on the environment of implementing the plan or programme.	impacts. In the opening text suggest that any mitigation measures suggested in the appraisal should be taken forward into the Neighbourhood Plan to ensure they are taken forward by the developers. The 'Site Descriptions and Requirements' section would be a good place to cover this.
8	An outline of reasons for selecting the alternatives dealt with	This is covered in Section 2 of SA.
	A description of how the assessment of alternatives was undertaken including any difficulties (such as technical difficulties or a lack of know-how) encountered in compiling the required information	This is covered in Section 3 of SA.
9	A description of the measures envisaged concerning monitoring in accordance with regulation 17	Covered on page 12 of SA.
10	A non-technical summary of the information provided under paragraphs 1 - 9	This has not been done.

Background para 3	You are right, there is no requirement for a Neighbourhood Plan to provide a SA but it might be required to be subject to a Strategic Environmental Assessment (SEA). Therefore in the second sentence of this para, suggest changing to "The determination as to whether such a Plan requires a <i>Strategic Environmental Assessment</i> is undertaken..." Also change the last two words in the para to 'Strategic Environmental Assessment'.
P3 last para	Drayton is located approximately 1.5 what south of Abingdon?
Sustainability Objective	Several of these objectives refer to the 'District'. Change this to be more relevant to Drayton NDP. P – "that delivers" is repeated.
Page 6, point 2	The plan objectives haven't been used to assess the strategic options because the strategic options are limited to engagement with developers.
P15 para 2	It would not be "illegal" for us to set an upper housing limit; it is against national policy and the presumption in favour of sustainable development.
Page 16	There is a fourth option to look at more sites. You could explain that this would not a reasonable option because it was

	not supported by the community and because of the highway constraints that face the village and the wider area.
Section 3	Explain why you have done the assessment of all of the sites because from the text above it reads that Drayton 2020 had no choice in the sites and the decision has been made already.
Page 46 H1 – P-LF2	However, there are several sites to choose from so it's not that restricted. Suggest this is only negative, rather than a significant negative.
Page 46 H1 – P-LF4	This policy will have an impact because you're proposing sites within/adjacent to the Conservation Area. Suggest this is a neutral effect because the policy does not prevent development from taking place in the Conservation Area.
Page 46 H2 – P-LF1, LF2, LF3, LF4, LF5	These policies wouldn't necessarily restrict the mix and types of houses. Suggest these will have a neutral impact.
Page 47 LF1 – P-LF5	Policy will improve look and feel by maintaining rural character - significant positive to be consistent with other policies in the assessment.
Page 47 S1 – P-LP1	Won't the inclusion of the village green have a positive impact on this?
Page 47 S1 – P-LF2	This policy will have a positive impact on minimising the impact of new development on the surrounding countryside by trying to contain it closer to the existing built up area.
Page 47 S1 - P-LF3 and 4	These policies will have a neutral or positive impact on minimising the impact on the countryside because they will ensure the development is appropriate to the rural character.
Page 47 T1 - P-LF1 and 2	These policies should have a positive impact on reducing road congestion as they should make the village more connected for pedestrians rather than continuing sprawl along the roads.
Page 49	You don't need to assess the community policies through the SA. This applies for all of the community policies.
Page 51 H2 – P-WP3	This policy shouldn't affect the mix of houses because a suitable mix will be provided on the sites developed for housing.
Page 51 LF1 – P- WP1	The policy makes suggestions about how the village green should be set out so it shouldn't have a negative impact or unsympathetically designed.
Page 51 LF1 – P-WP3	The design policy should mean that business development is sympathetically designed and therefore shouldn't be negative.
Page 52 T1 – WP1	Having additional recreational facilities in the village should reduce the need to travel outside of the village and therefore this could have a positive impact on this objective.
Page 52 T1 – WP3	Having businesses in the village should mean that some local people could walk or cycle to work instead of commuting out of the village.
Page 62 LF1	You can refer here to the fact that the design policy will make

– P-H1, H2	this a positive as it will require development to be in accordance with the district and village design guides. Also the policy itself (H1) makes clear that the affordable housing should be built to the same high quality design standards. So overall the outcome should be positive.
Page 62 – S1 – P-H1, H2	Again, you can refer to other policies in the NP that should mitigate this risk such as the design and landscaping policies.
Page 64 – WP3 – H1, H2	Again, the requirement for contributions (both financial and onsite) should help to mitigate this.
Page 65, S1 - P-H6 and H7	These policies should help the environment by encouraging higher energy efficiency.
	After the table it would be good to have a 'Recommendation' section, where mitigation for any negative or significant negative outcomes is suggested or explain why, even though it's negative or significant negative, the benefits of the policy overall will outweigh these.