

## **Comments on Exhibition 27 June 2014**

These comments relate to the three housing sites as described at the exhibition and this note will form the basis of comments to be attached to the representations made on the draft NDP.

### **General**

1. The request for suggestions for road names is both premature and unfortunate. It is quite possible that the impression would have (deliberately?) been given to many people that all three sites will be included in the NDP and that applications would receive support from the Parish Council. The PC should have been making it clear that people could comment on both the principle and detail of these proposals and should include a clarification in the July Chronicle.
2. There was no evidence at the exhibition that the developers had taken into account the need for predominantly small dwellings (with a southern aspect) to address the housing need (see Drayton Housing Needs Survey), the shortage of small social housing and the need to provide dwellings attractive to new households and to those downsizing from larger houses within the local area. There is no shortage of larger dwellings available on the market (see Rightmove) while new households and downsizers are largely reliant on new developments. Planning is meant to provide a choice of housing (NPPF para 50) and new village development could meet a deficit of small dwellings with generous gardens.

### **Road proposals**

3. The PC should have provided an explanation of the current state of affairs in the area to the south of Abingdon in respect of traffic generation. The existing permission for 159 dwellings at Drayton Road Abingdon cannot be implemented without improvements to the junction with Ock Street/Marcham Road. Although there may be scope for a much smaller number of dwellings, this constraint must reasonably apply to the developments now being proposed in Drayton. The only residential development of any scale that could be approved in the absence of effective highway improvements would have to include travel plans showing a minimal increase in traffic generation. Such proposals would, in fact, be consistent with the Climate Change Act (see also paragraph 94 of the NPPF). Measures that would need to be proposed include low carbon car clubs for new and existing residents and contributions to the local bus services. By not properly addressing the obvious transport difficulties the PC has reduced the point and relevance of this consultation.
4. The proposals to introduce traffic calming measures throughout the village represent an unnecessary expenditure of public or private funds. It is very unlikely that public funds would be available and it would not be a lawful use of financial contributions through section 106 as none of the engineering works would be reasonably necessary for the development of any of the proposed sites. In fact, all of the sites being proposed could include the traffic calming measure

of a mini-roundabout at the respective accesses. There does not seem to be any planning or highway reason not to design the site accesses in this way. There are far more pressing needs for financial contributions than highway engineering, including those 'necessary' to make Drayton a more sustainable location for residential development (eg village hall and recreational facilities). The most effective form of traffic calming would, in fact, be a 20 mph speed limit throughout the built-up area.

### **Manor Farm**

5. No development can take place on this site unless additional playing fields are provided. Although the developer could make financial contributions, the landowner has previously indicated that its land to the west of Lockway could be made available for that purpose. Despite this issue being raised at a meeting with the landowner about 18 months ago it remains unclear whether the landowner would meet the deficit created by the proposed residential development in this way. The landowners representative at the exhibition did acknowledge this possibility. The landowner also needs to address the shortage of allotments which would be created by its proposed housing and there is the opportunity to require land for small holdings when an appropriate local food policy is included in the NDP.

6. The statutory duty (reflected in development plan policy) within conservation areas is to have regard to the desirability of preserving or enhancing the character or appearance of the area. It is very difficult to envisage how the current proposals would either preserve or enhance either the character or appearance of the conservation area. The "site" has a rural character which derives from its agricultural use. The obvious way in which this character would be preserved would be to retain the undeveloped area for the accommodation of livestock. This would avoid the temptation to prettify the area contrary to the principles applicable to the conservation area - with the associated maintenance liability. This would not preclude the creation of gaps at appropriate points in both the Henleys Lane and Abingdon Road frontages.

7. It is very unclear how an area greater than that associated with the 16 dwellings shown in the outstanding permission could be supported given the statutory and policy constraints over development within the conservation area. Giving the opportunity to develop a large site to the south of High Street there is no overriding need for 50 dwellings, although a number greater than 16 would be possible given the desirability of smaller dwellings. The site does have the particular advantage of being able to accommodate south facing terraced housing which would benefit from attractive views across the open land to the north.

8. Access to the site should be through the construction of a mini - roundabout at the Hilliat Fields access which would have the benefit of slowing traffic along Abingdon Road (hopefully in accordance with a 20 mph speed limit). It is doubtful whether the proposed junctions spacing would have the necessary separation distance. The parish council should also be negotiating the

implementation of the improvements to the village green that would have been contingent on implementation of the original permission.

### **South of High Street**

9. This would appear to be a very sensible site to develop during the 15 year plan period. The advantage of a development of this kind of scale (i.e. about 160 dwellings) should enable the developer, at no cost or inconvenience, to propose parts of the site for both self/custom building and co-housing. Given that the development of this number of dwellings should be phased over the plan period of 15 years there should be several years available to potential self-builders and co-houses to organise the use of these allocated areas. If and when, completion of the site becomes desirable in the absence of such interest then this would be permitted.

10. This developer also has the problem of meeting the deficit in recreational facilities that would be created by the housing being proposed. In this case financial contributions would be appropriate. The balance of the site not required for housing could reasonably be allocated to allotments and/or smallholding use (eg village farm) in accordance with an appropriate policy in the NDP, as well as providing an associated agricultural dwelling.

11. Pegasus had the courage to include a very stylish and attractive modern design in its range of possible building types. This demonstrated the redundancy of a building code for a village like Drayton which has the distinct advantage of being able to accommodate good designs of any type.

12. Incidentally, the barns in the same ownership to the north of the development site would make ideal workplaces for local employment. Given the need to demonstrate minimal traffic generation, this employment use co-located with the housing could be an attractive part of any proposal.

### **Barrow Road**

13. Given the possibility of about 200 houses being built on Manor Farm and to the south of High Street it is unclear why there is any need to allocate another site - particularly one that is so badly related to the remainder of the village and its facilities. There does not appear to be a need for the playing fields being proposed as the recreational need created by the developments at Manor Farm and south of High Street would need to be met elsewhere.

14. Were of this site to be developed in the later years of the plan period then land could and should be made available for allotments/smallholding.

15. The development was being promoted as "family housing" which would not be the kind of housing needed in the village. The layout appeared to take little or no account of the southern aspect and the need for terraced housing. The access appeared to have inadequate junction spacing and should, in any event,

introduce a roundabout that would act as a very effective way of slowing traffic speeds into and out of the village.

16. It has been and remains clear that one if not the main justification for including this site in this consultation is the preference over other land in the same ownership (e.g. to the east of the burial ground). This is not a proper or adequate justification for supporting a site on the extremity of an already straggling village when priority should be given to the development of more suitable sites that would serve to consolidate the built-up area.

## **Summary**

17. It was useful to see and consider the relative merits of the 3 sites. The overriding impression is that development should be phased over the 15 year period of the plan. This approach has been undertaken in other neighbourhood development plans, in the case of a recent permission Bampton and would be fully justified given the tendency (i.e. 90%) of those living within a village wanting to find suitable accommodation in the village compared with only 20% moving within a town (information previously provided to the Parish Council). Developing 200+ dwellings within the early years of the plan, even if all were of 2 bedrooms, will require further and less suitable sites to be allocated before 2031.

18. Given the extent of the contact between the Parish Council and the landowners/agents it is disappointing to see the lack of concentration on smaller dwellings for new and downsizing households and but the main form of housing is not terracing with a southern aspect. Despite these negotiations it is also unclear how the better sites (i.e. Manor Farm and south of high Street are expecting to meet the need for recreational facilities.

19. There is the potential for the developer of Manor Farm to meet the deficit it would create for recreational facilities on a suitable site to the west of Lockway, that could also be enabled by financial contributions from any development to the south of High Street.

20. The need to be a much higher degree of openness about the deficiencies in the local highway network that have prevented the implementation of an approved development in Abingdon (to be preferred under the presumption in favour of sustainable development). All these developments could be delayed until the necessary highway improvements are carried out or, making a virtue out of a necessity, travel plans should be required that could be relied upon to create only minimal net increase of car movements from the local area in peak hour.