

Comments on the Pre-submission consultation Drayton NDP 2014 - 2031

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*These comments (in italics) are being made as a further attempt to assist in the preparation of an NDP designed to ensure that development permitted in the village in accordance with the NDP would also benefit from the presumption in the NPPF in favour of sustainable development. This requires both that new development to be intrinsically sustainable **and** that Drayton can be made a (much more) sustainable location.*

Unfortunately the most recent plan has been prepared without the setting out of adequate and intelligible responses to previous comments. Hopefully, when the NDP is forwarded to the LPA, it will follow good practice and a schedule of comments together with the NDP planners' reasons for accepting or rejecting them will have been prepared. As always, all the following comments are open to explanation and discussion.

These and previous comments have sought to assist in the drafting of prescriptive, proscriptive or permissive policies (including a note on comments made by NDP inspector Graham Self), and in meeting the basic condition of contributing to the achievement of sustainable development. To comply with that basic condition the draft should be taking a much less superficial position on sustainability from which it is not be possible to detect the need for 80% reductions in GHG emissions by 2050.

The impact of NDP policies on the viability of development is a concern that should be addressed. There should be a policy requiring open book accounting when and if an applicant claims that the viability of a development would prevent any or all of the contributions under s106 required in accordance with NDP policy, the affordable housing and local housing needs quotas, the energy efficiency/generation requirements or developer funded car club and public transport payments (it might not be possible to relax transport requirement due to the very severe local highway constraints).

Foreword

'There was a realisation that this could be the opportunity to improve Drayton's facilities to make it a sustainable location to live.' A village with such limited facilities, shopping and employment opportunities cannot be made a sustainable location. The NDP should be presented as an opportunity to support new development on the condition that it would make the village more sustainable by improving facilities, developing low carbon transport and local food systems and by insisting on high levels of energy efficiency and reducing under-occupation through concentrating on small dwellings.

'The purpose of these meetings [with landowners] has been to ensure that the interested parties can work together to realise their separate aspirations while, at the same time, providing Drayton with a future which is enhanced, rather than diminished by such development. In all this Drayton2020 had been

greatly aided by design concepts from the Adams Habermehl Environmental Design Partnership.’ *Unfortunately this describes the effort that has been expended on what should have been seen as the implementation of the plan. The making of an NDP should have required only limited if any assistance from a landscape architect. The plan could have been compromised by the attempt to ensure that landowners can ‘realise their aspirations’. By moving too far on the detail of the development of three sites the NDP planners might have reduced the likelihood of receiving the public comments that should have been sought on the principle of potential sites. Drayton 2020 was given authority by the Parish Council to prepare a NDP. It is a separate matter, and one for the PC itself, to be involved in its implementation as a statutory consultee on planning applications*

‘countless hours redrafting and co-ordinating those policies to create a coherent overall vision for the future of the village’. Unfortunately policies have not all been drafted to explain exactly what developments would or would not accord with the plan.

2. The primary purpose of the Neighbourhood Development Plan is to ensure that decisions taken in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004 will result in development that benefits from the presumption in favour of sustainable development (National Planning Policy Framework NPPF paragraph 14). *This is a confusion between the law, the development plan and the NPPF (including the presumption). ONLY if the NDP policies are drafted in such a way that development approved in accordance with the NDP (ie following s38(6)) would be sustainable – that is not yet the case - would it benefit from the presumption.*

4. *The SHMA is not a draft but claims to be the objective assessment of housing needs. – not all to be located on strategic sites. It was the draft housing delivery proposals that were consulted on in Feb 2014.*

5. *Government policy on sustainability standards must be taken into account, but the NDP can set out higher and different standards that meet an evidence based view of sustainable development (eg the 2011 Carbon Plan, 4th Carbon Budget/Climate Change Act 2008, Zero Carbon Homes by 2016 and 5th Report of the IPCC). An inspector has found that the Bruntland definition included in the NPPF implies that, if new development cannot show that it would ‘consume its own smoke’, it would not be sustainable development and would not benefit from the ‘presumption’. In fact the NDP must include policies that ensure that all development carried out in accordance with the plan would be sustainable to meet the Basic Condition of contributing to the achievement sustainable development. The NDP should explain how new development could in fact increase the sustainability of Drayton for new and existing residents. At least the orientation of dwellings should be governed by the need for a southern aspect. A policy should be included requiring an Energy Assessment with all applications to set out the energy efficiency of the dwellings and onsite generation (and allowable solutions). It could require higher standards to be offered as an option to potential purchasers if open*

book accounting demonstrates that such standards for every dwelling threatens the viability of the development.

15 *The website says that the resubmission draft would be informed by the results of this exhibition which actually took place after its publication? The exhibition created the impression (ie asking for road names) that three sites were a 'done deal' that could have prejudiced the consultation on the suitability of the sites and, therefore, this draft plan.*

17 *This draft plan includes few if any of the suggestions made by me over the previous 2 years as parish councillor, steering group member and then as a member of the public, without any reasoned response. This is a further opportunity to provide adequate and intelligible reasons for accepting or rejecting comments made by the public.*

18 *Considerable thought was given to the contents and format of the questionnaire, in particularly the scope and framing of questions pertaining to the core themes of the emerging Neighbourhood Development Plan. As anticipated, the questionnaire yielded a wide range of valuable data, providing further insight into the aspirations and concerns of Drayton residents That would suggest that there would be policies in the draft plan to facilitate local food systems (200 people wanting to be involved in smallholding), both self-building (interest from 145) and co-housing (interest from 50 and car club (40).*

29. *The 2011 Census, is 2353. Comparison with this figure from the 2001 census indicates the Parish's population has increased by over 6% in a decade (in 2001 it was 2218). NOT 10%*

30 *the over 65 population in the Parish has risen from 18% to 22% over the previous census period. And likely to increase further justifying much greater focus on housing suitable for the elderly (usually one or two person households). The SHMA (para 8.31) actually describes co-housing as a form of housing that could serve this purpose – without actually calling it that.*

32 *2011 Census Drayton had 978 dwellings, an increase of 9% (83 extra houses) Household size decreased from 2.48 to 2.41 in ten years reinforcing the need to build small dwellings.*

33, *85% have one or more spare reception rooms and 80% have one or two spare bedrooms. Mostly 2 – a level of under-occupation that the NDP should say is 'unsustainable', especially at a time of housing shortages.*

34 *SWOT opportunities "Willingness of Parishioners to engage constructively with developers to their mutual benefit" - It should not be assumed that all developers would benefit from the NDP.*

To provide Drayton residents with the opportunity to meet their housing needs within the village. This is an important 'opportunity' that should lead to policies requiring smaller houses (not necessarily smaller gardens)

Weaknesses: Lack of cohesion in Parish's existing housing and recreational infrastructure ; *Need to concentrate development close to the centre of the village and close to recreational facilities –locating playing fields at the northern extremity of the village would further weaken the village.*

Limited opportunities for retirees wishing to downsize and first-time buyers looking to buy in Parish. *Need for predominantly smaller dwellings and restriction on future extensions.* It is reasonably necessary to require any larger houses to be designed to make subdivision simple and cheap to facilitate Lifetime neighbourhoods rather than or as part of the design of Lifetime Dwellings. Also see para 8.31 of the SHMA.

Village divided by main Abingdon/Steventon Road. *It takes < 1 min to cross the road and 30 mins to walk the length of the village!*

Threats: population growth might exceed capacity of existing facilities. *Need for a clear list of facilities close to or over capacity.*

41 most 'appropriate relevant'?(*typo*)

46 *The village is not in halves; prettifying the Manor Farm land would not be acceptable in the Conservation Area – the Millennium Green is already available if there was a demand for village events; 'infilling' has a particular meaning that does not normally apply to larger sites:*

47. *Links to the land might be a good idea if its character and appearance as agricultural land is preserved. In Steventon there is an area of allotments in the centre of the village, or this could be part of a village farm/community supported agricultural enterprise.*

If figure 3 is to be included the red line needs to be on the key. Although "illustrative" acceptability of any development (outside the area of the original permission) will depend very much on the size of the open area. Support for this concept must be reviewed if the plan is actually submitted shows an unacceptably small area, and this should be mentioned in the text. The danger with 'prettification' is that the NDP could commit Drayton residents to extensive and expensive grass cutting.

P-LF2 should be reworded and relabeled as it supports any development which is not ribbon development. It should go no further than saying that ribbon development will not be supported. The village does not have a cohesive character, but achieving this could be expressed as an objective of the plan (the logic behind support for development at Manor Farm and south of High Street and reservations/opposition to Barrow Road.

P-LF4 should not change the statutory test of preserving or enhancing the character or appearance. The 2nd half of this policy should be in the supporting text and the rationale (design statement or council resolution) must be included if to be relied upon.

P-LPF5 Greening of the village not the parish? Use complement rather than reduce impact. Can we have 'landscaping' rather than 'greening'?

52 Delete 'our desire' and 'reflect' that are insufficiently clear. Replace with 'Developments will be required to contribute... Figure 4 has no purpose unless it is referred to as a potential for biodiversity offsetting or for planting that cannot reasonably be achieved on development sites.

C-LF6 Noise from A34 is a matter that should be dealt with in planning policy and not community policy. The policy should state that no residential development should take place unless both internal and external spaces meet with current standards (eg WHO). The plan should also refer to a reduction in the speed limit that would be as effective and cheaper than fencing or resurfacing and would also reduce congestion. The NDP could also support the use of noise screening bunds for mounting PV panels. There should be a policy supporting PV only when brownfield, the A34 and all roofs in the village have been utilized (or provided with that opportunity).

59 It is important to note that the one football pitch is located on a designated village green and is therefore not protected from other public use.

PLANNING POLICY P-WP1: ADDITIONAL RECREATIONAL FACILITIES

*Land forming part of major development sites (10+ dwellings) together with any surplus community land should be developed to provide additional and enhanced sporting and recreational facilities for the Parish as laid out in Appendix E *What does this mean? All new development in the village should contribute to facilities that are at or over capacity such as playing fields.**

P-WP4 should be omitted as it has no foreseeable purpose. A policy is required to apply to new retail

Having identified working from home as one of the elements of the village there should be a policy (to reduce peak hour traffic) which encourages the design of any larger dwellings to include the ability to work from home (i.e. storage, workshop or office space). This is a normal attribute of co-housing.

The use of the land around the village and within the parish for agricultural (and associated employment) purposes should be a fundamental part of the NDP.

66 The effect of this definition needs to be evident in the remainder of the plan. 'Local' building materials cannot be specified and there are much more important planning policies needed to address this key proposal. The key proposal of protecting the natural environment should be to retain it where possible and only offset where absolutely necessary.

70 Should refer to those moving into the village as well as those wanting to stay.

72 Delete reference to 'local building materials; here and in P-S1, unless this is made into a community aspiration. Neither should 'encouragement' be any part of any planning policy.

75 Which local authorities? and what Parish goods or services? And does 'freely available' mean without charge? If this is all about stalls then there should be a policy which addresses this particular topic.

77 The cohesion has been affected not by the movement towards our neighbouring settlements but by the straggle away from the centre (that the Barrow Road site would exacerbate).

80 The NDP should not seek to introduce a further 'presumption' additional to the one in the NPPF. It should simply say that the elements that do not "consume their own smoke" would not benefit from the presumption in the NPPF.

The policy refers to sustainable locations but the point has been missed that Drayton itself is an unsustainable location without **enhancement** of services and facilities. This point is absolutely fundamental to requirements to contribute under s106 (or CIL).

Self building and cohousing cannot be community policies as they are to do with the use and development of land for which planning permission is required and to which important planning policies including the presumption in favour of sustainable development apply. This is underlined by the encouragement by Government for (community or group) self-building (inc para 50 of NPPF and Custom Build Serviced Plots Loan Fund Prospectus DCLG HCA June 2014). The NDP should do what is necessary for these forms of development to be carried out (as fundamental components in the contribution towards the achievement of sustainable development) based on clear and precise planning policies. The most obvious way would be to require proportions of any large site to be reserved for self-building and co-housing (See Housing Policy Guidance 2012).

The VWHDC is committed to learning from NDPs ahead of the Local Plan preparation. The PC should be asking the LPA to keep district registers of those interested in both self-building and co-housing.

87 If self-building and co-housing are part of 'sustainable development' in a development plan, why are they not land use planning policies? The NDP should define self- building (and possibly co-housing) as 'affordable' for the purposes of the 40% requirement in the Local Plan. This is logical due to the savings that are possible through self-building and the exemption from CIL.

95 Drayton 2020 has been formally established to prepare the NDP. The implementation of the plan is another matter and it is the parish council which has statutory responsibility for the consideration of planning applications (and

providing views to the LPA). There is not yet any formal procedure for the negotiations to be carried out with potential developers.

96 There have been no section 106 monies coming to the village (although implementation of the existing permission at Manor Farm would have provided land and money for maintenance). The NDP should not express the preference of Drayton 2020 whose job is limited to drafting precise policies to be adopted by the PC for future use (by the LPA) in the determination of planning applications.

97 Long Meadow is actually closer to the village hall and recreation ground than Barrow Road. This is not a trivial point.

Table 5 Although localism and the NDP process does give the neighbourhood planners some license to describe and grade potential sites, it stretches known planning tradition and convention to describe any of the sites other than Manor Farm (11) as being within the existing built-up area of the village. The grading also continues to ignore a very important distinction between Barrow Road (02) and most of the other sites in terms of the ease of pedestrian access to village facilities. It is nearly twice as far from the village hall and recreation ground as Long Meadow.

Correcting this description will require the re-drafting of the housing policies that should state that development would not be allowed outside the existing built-up areas except for the sites allocated under the allocations policy.

Another anomaly would appear to be in respect of the impact on the surrounding rural landscape. 02 is very prominent in views both within and coming into the village but is graded the same as 07/08 which is only seen from the users of the bridleway (Eastway).

110 Does Drayton 2020 have any authority for seeking funding for the traffic management scheme? Not being necessary for residential development in the village s106 contributions cannot be used for traffic calming (Appendix E needs correcting). A 'holistic' or systemic approach would be to use new development to finance car clubs (preferably low energy) and improvements to the bus services.

Site allocations – *the three sites have been discussed on the note attached to these comments. The NDP should explain that any large site should provide housing to meet a proportion of the need found in the village housing needs survey, and the demand for self-building and co-housing identified in the NDP village survey.*

Manor Farm

114 The importance of the bus stops in the village centre is the availability of real-time information (that is made more important by the irregularity and unreliability of the current bus service)

The description overlooks the fact that the contribution which the site makes to the conservation area is its very rural character and appearance (reference must be made to the original designation and to the comments made at the appeal inspector when the 16 houses were permitted). This is a more 'objective' approach to development in conservation areas than personal preferences. There is also a very substantial deciduous hedgerow along the Abingdon Road frontage some of which would be removed (facilitating public access might be acceptable under 'enhancement'). However, it is difficult to see how a village green would preserve or enhance the character or appearance of the conservation area. Prettification would not normally be regarded as doing either. This is a matter which needs to be very carefully addressed in this section of the NDP if it is to pass independent examination.

Insofar as the site is being privileged and regarded as one of those to be developed in the early years of the plan, the question of what contribution will be made to the recreational facilities (playing fields, allotments, smallholding and village hall) should be addressed. There is no guarantee, and in fact it would be undesirable, for reliance to be placed on playing fields being provided some indeterminate time in the future at the northern extremity of the village. There is no good planning reason not to identify land to the west of Lockway for playing fields (this was a suggestion of EoP). The undeveloped land at Manor Farm could stay in agricultural inc allotment use.

There is an opportunity to implement the improvements to the village green for which there is DEFRA approval.

South of High Street

124 *Reference should be made to the real-time information at the village green bus stops.*

126 *If this site is to be developed, as it should be in advance of Barrow Road (02), then it must contribute towards recreational facilities (playing fields, allotments, smallholdings and village hall). The scale of this development requires phasing and creates the potential for self-building and co-housing.*

The barns at the northern end of the site would be ideal for employment purposes.

Barrow Road

The bus stops needs Realtime added at developer expense. Reference should be made to the poor connectivity of this site (other than to the school) and the problems this would cause for recreational facilities (especially duplication of pitches and pavilion). If this site were to be developed extra land could be required by NDP policy for smallholdings to meet the demand shown in village survey.

147 *Phasing should not be a "where possible" matter (that has no place in a development plan) but one addressed by clear and precise planning policy. If 250 new dwellings are regarded as the maximum to be provided over the 15 year period of the NDP then it would be logical and desirable to limit the rate of development to 80 dwellings in each five-year period. (Evidence from Tattenhall NDP limiting sites to 30 dwellings and the propensity of people to move within villages ie 90% as opposed to within towns 20%). Without a phasing policy there would be a real risk of the allocated sites being developed in the early years of the plan creating needs for more houses in the later years on more unsuitable sites.*

There is also logic in phasing between sites such that the land at Manor Farm was developed in the first 5 years together with part of the land to the south of High Street, with the site at Barrow Road possibly being developed from 2025 onwards.

148 *The proportional growth of 86 dwellings proposed in the IHSP was expected to simply maintain the population of the village. This is part of the evidence in support of smaller dwellings so that the 250 dwellings proposed in the NDP would reduce under-occupancy and facilitate a better balance between the size of households and houses. A small dwelling policy should be complemented with a 'no extensions without planning permission policy' (ie supporting conditions removing permitted development) to preserve smaller units, and their affordability and energy efficiency (all part of the basic condition of contributing to the achievement of sustainable development)*

There is insufficient consideration in the NDP of household size and, therefore, the necessary evidence to support assertions regarding the size of houses (but not necessarily gardens) on the new developments. The SHMA contained very limited reference to under occupation, implying the need to develop predominantly smaller units, and numerous references to the benefits of building larger units. This analysis appeared to overlook the availability of larger units on the market (easily established through reference to Rightmove showing the preponderance of larger dwellings on the market) and a failure to understand the affordability of smaller homes.

However, the SHMA did describe (para 8.31) if not actually label a form of housing particularly for the elderly that involved the sharing of space. This should be taken as part of the demonstration of "objective need" for cohousing. The NDP should be making the point that housing should be built that is attractive to older households but not exclusively for them.

149 *It is not improving amenities of the village, but making it a location for development that could benefit from the presumption in the NPPF in favour of sustainable development. This paragraph should clearly spell out the fact that the 159 houses on Drayton Road Abingdon were found to cause a severe highway impact in the absence of mitigation at the junction with Ock Street and Marcham Road. It is uncertain as to what number of houses on this route would be acceptable without such an improvement, but it would be reasonable to suppose that the site at Abingdon (that is a relatively more*

sustainable location) would have some priority over sites in more car dependent villages with fewer facilities and worse public transport. This is a major issue for the NDP with implications for its transport policies (policies that could be reasonably relied upon to reduce the dependency on and minimising the use of the private car).

C-T3 *The need for car sharing and pooling esp. car clubs, is not a 'community policy' or aspiration but fundamental to future development in the village. Travel Plans must be required from all new development to demonstrate how there would be no net growth in car use (e.g. through membership of developer funded car clubs offered to new and existing residents) and/or that the bus services will be made more attractive. The latter is fundamental in the morning and evening peak times. The sharing of cars is fundamental component to ensure that more housing in the village would not cause congestion making existing housing and employment even less sustainable.*

COMMUNITY POLICY C-T7: ADDITIONAL BUS SERVICES *should not be regarded as a community policy being fundamental to the development in the area to the south Abingdon. In fact, the housing delivery plan produced by the Vale of White Horse District Council stated that development in this area would not be supported in the absence of identified and deliverable improvements to the bus service. 20 new dwellings have been regarded by OCC as the upper limit.*

C-H8 Self-Build – *The Government has recently made money available to assist partnerships between self-builders and developers. NDP planning policy should require a proportion of all large sites to be made available for self-building (See Housing Policy Guidance previously adopted by the PC)*

C-H9 Co-housing – *A similar approach should be taken for co-housing as the most sustainable form of residential development. The phasing of the development of the large sites would enable land to be reserved for co-housing without any cost to the developers.*

These policies should not make specific reference to "parishioners" as 250 dwellings would meet wider and not necessarily local needs.

The plan should also make it clear that the allocated sites should provide for the Local Needs Housing which would, in the absence of an NDP be provided on exception sites (like these 3 allocations - outside the existing built-up area). The LPA now supports local user conditions on a proportion of the affordable housing being provided.

Local Food Policies

Does the NDP make the necessary reference to maintaining a proportional supply of allotments other than in Appendix E? The village survey showed a very substantial (ie 200 people) support for participation in smallholding (i.e.

more than an allotment). Local food was also an important issue for the Sustainability Appraisal.. Given that the food supply chain is responsible for between 30% and 50% of global carbon emissions and that food growing is essentially a matter for the planning system addressing the use and development of land, the absence of appropriate policies enabling the access to affordable land and housing is an unfortunate omission from the NDP. Over the next 15 years there would seem to be no particular difficulty in using a number of the 250 new houses to be built over that period for occupation by people occupied in agriculture, on a full or part-time basis either as part of the local needs allocation or (subject to approval by the LPA) part of the affordable housing allocation. If, as an example, a farmer is prepared to provide nearly 10 ha of recreational land it is would be wrong to assume that the land could not be available for smallholding purposes. That would clearly not be possible on the Manor Farm development unless (and this could be a preferred option) the surplus land was used for grazing and growing and not mowed for amenity (village green) purposes.

The RTPi has made an important reference to this in its Planning Horizons Future-proofing society 'At the same time, planners and others will need to learn from and also respond to communities, who may in some cases be ahead of both policy-makers and professionals in reacting to these challenges or changing behaviours (such as supporting more local food produce or reducing car use).' It is a pity that this community is not grasping this opportunity,

http://www.rtpi.org.uk/media/1025151/rtpi_planning_horizons_2_future-proofing_society_june_2014.pdf?dm_i=1L61,2LOGQ,A2M5B8,9FIQ6,1

Summary

1. The plan should correctly identify all the sites (apart from Manor Farm) as being the only exceptions to preventing development 'outside the existing built-up area' being chosen on the basis of having fewer constraints and causing less harm.
2. The plan clearly states that the 250 houses are the maximum that would be desirable over the 15 year period. It is, therefore, logical and reasonable to include a phasing policy to ensure that this total would not be exceeded, and to privilege the more desirable or least undesirable sites.
3. The plan should state that this development is being supported on the basis that it could and should make Drayton a more sustainable location (hence the necessary s106 contributions)
4. There is an abundance of evidence to support policies requiring predominantly smaller dwellings (not all with small gardens) and any larger dwellings to be easily sub-divided to avoid the unsustainable levels of under-occupation noted in the plan.
5. Given the known transport difficulties, clearly illustrated in the Drayton Road, Abingdon decision, and referred to in the Vale of White Horse District

Council's housing delivery proposals, all new housing in Drayton must be predicated on very limited if any growth in car traffic. The need for and contents of Travel Plans (requiring development funded car clubs and improvements to bus services, inc RTI) must therefore become part of the NDP proper and not community aspirations.

6. There must be policies to require the provision of land within the allocated sites for the Local Needs Housing identified in the 2012 survey and reserved/safeguarded for self- building and cohousing subject to demand (that could be allowed as an exception to the phasing policy). The potential demand has been identified through the village survey (and should not in any event be regarded as exclusive to existing Drayton residents). In particular, cohousing can be shown to be the most, if not the only, form of sustainable residential development. The plan can also indicate that housing layouts should be provided that our amenable or conducive to cohousing even if not managed at the outset in accordance with existing models. Such housing would in any event fall within the category of good neighbourhood development. Registers of those interested in both self-building and/or co-housing should be kept by the VWHDC.

7. There should be policies in support of the supply of both allotments and smallholdings (with associated affordable housing) given the support within the village survey and the urgent need to support local food production, processing and distribution. This is a fundamental part of sustainable development and the need for access to affordable land and housing for this purpose should be a Basic Condition of development plans at neighbourhood and district level.

8 Policies should require maximizing use of southern aspect, to facilitate the reconfiguration of larger units, and support conditions requiring planning permission for extensions.

9. There is no need any more design guidance than is available in Build for Life 12.

10. There should be a policy requiring an Energy Assessment to see whether a development should benefit from the presumption in favour of sustainable development (noting that there are the social. economic and other environmental components to take into account) covering the building fabric/air tightness, energy/embedded carbon in the materials, insulation, quality control/post occupancy inspection, orientation, on and off site generation (allowable solutions). The expectations of an Energy Assessment can change and be updated through the 15 year plan period.