



ENGLISH HERITAGE

SOUTH EAST

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29th July 2014

Dear Mr Perrow,

Drayton2020 Neighbourhood Plan Revised Copy Pre-Submission Consultation

Thank you for your e-mail of 16th June advising English Heritage of the consultation on the Drayton2020 Neighbourhood Plan Revised Copy Pre-Submission. We note that this is a consultation on a revised version of the Plan but rather than confine our comments simply to the revisions, for clarity we have reiterated our comments on the previous version where appropriate.

We welcome the recognition of the heritage interest of the parish in paragraph 28 but we would welcome greater detail and reflection of the significance of the historic environment, particularly as this information is not to be found in the Sustainability Appraisal Scoping Report on which we commented in December last year. We would like to see more information about the Conservation Area and listed buildings in the town and their significance, in addition to the two Scheduled Monuments described in the Scoping Report. There should also be reference to non-designated features of local interest - is there a list of locally important buildings and features ?

Further information on designated assets is available from The National Heritage List for England, on local listing from the English Heritage guide (our letter on the Scoping Report included an appendix with links to these documents) and on non-designated heritage assets from the Historic Environment Record (HER) maintained by Oxfordshire County Council.

There are a number of references to the character of the village in the Plan e.g. in Table 4 and paragraphs 46. We welcome and support the aims to develop an environment that builds on and enhances the distinctive character of the village; to weave the historical background of the village into any new development to retain character; and to maintain and enhance the character of the village. However, we regret the loss of the aim to emphasise the village's historical roots to strengthen its identity.

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We also welcome and support the reference to the village's historical character and the requirement for any development in or adjacent to the Conservation Area to look to conserve and enhance it in paragraph 50. We also welcome and support Policies P-LF1 (but see comments below), P-LF3, P-LF4, P-LF5, LF-7 and P-S.1 although we would prefer to see a specific policy for the conservation and enhancement of the historic environment and heritage assets in the parish.

However, we are not aware of any studies or exercises to investigate, understand and explain the historical or other character of the village. When commenting on the Sustainability Appraisal Scoping Report in December last year, we noted that there was no description of the character of the village and no references to any characterisation exercises of the village as a whole or of the Conservation Area (in fact, it is our understanding that the Conservation Area was designated in 1969 but that there is no Character Appraisal or Management Plan).

A characterisation study can help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change.

Without such a detailed understanding of the distinctive character of Drayton, what its defining characteristics are, it will be difficult to ensure that new development retains (or reinforces) historical character and that that character is generally maintained and enhanced. It will also be difficult to ensure that sites for new development are the most appropriate in terms of respecting the historic character of the village, which we note was one of the most important site selection criteria voted for by local residents and which we welcome and support (as we do criterion 8).

As regards the proposed development sites identified in the Plan, we have the following comments.

Manor Farm: this site is within the Drayton Conservation Area. Figure 3 of the Plan indicates that the proposed housing development might be restricted to the eastern and south-eastern side of this area, with the rest given over to a new village green.

However, Policy HE1 of the Vale of White Horse Local Plan 2011 states that development will only be permitted on open spaces in Conservation Areas where it can be shown that these areas do not make a positive contribution to the Conservation Area's special interest including its relationship with its landscape setting or to views within, into, or out from the Conservation Area which would be lost or damaged were the development to be permitted.

We recognise that Policy P-LF4 of the Neighbourhood Plan is intended to ensure that any development within or adjacent to the Conservation Area conserves or enhances its character and appearance and its setting, but without a detailed character appraisal of the Conservation Area, is there a proper understanding of the

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contribution of this open area to the special interest and character of the Conservation Area and can the Parish Council be confident that development on this site would not harm that special interest/character and the character of the village (paragraph 92 of the Plan describes the Conservation Area as key to the character of the village) ?

Without further detailed assessment, English Heritage is not convinced of the suitability of this site for development in respect of the historic environment and considers that the retention of this allocation without further assessment the potential exists for internal conflict within the Plan and conflict with both Local Plan Policy HE1 and the National Planning Policy Framework.

South of High Street: our records do not show any designated heritage assets on this site, but it does abut the Conservation Area and therefore forms part of the setting for the Area (and of a number of listed buildings). Both Policy HE1 of the Local Plan and Policy P-LF4 of the Neighbourhood Plan also seek to protect the setting of conservation areas in the district from harmful development.

This part of the Conservation Area is very much of a village edge character, with widely spaced buildings, a lot of trees, wide verges and rubble stone walls. These elements give it a very pleasant appearance. Any access to the development site will have to be across this area and the only way of achieving it without demolishing buildings which make a positive contribution to the conservation area would be to introduce a road at the west end of the site, demolishing a section of stone wall.

This will inevitably involve a degree of harm to the character of the area as the village edge character just described will be eroded by the new road. In order to mitigate this harm as far as is possible particular care will need to be paid to highway engineering and landscaping and further detailed assessment work is required to inform the exact site boundary and the quantum, nature and layout of development on this site.

There should also be a requirement to retain the external field boundaries, which are identified in the Oxfordshire Historic Landscape Characterisation, currently underway.

North of Barrow Road: According to our records, Site 1 has no designated heritage assets, but the Ordnance Survey map shows tumuli in the northern half. The fact that these are not scheduled monuments does not necessarily mean that they are not of national significance. It would appear that the Parish Council has sought the advice of the Oxfordshire County Archaeologist (hopefully for all three proposed development sites) and we presume that no objection has been raised to the principle of the development of this site.

Whilst we welcome the requirement for a full archaeological survey, the Plan should specifically state that the developable area (and therefore the number of houses) and layout is dependent on the results of that survey.

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These comments are without prejudice to any comments we may wish to make on any proposals for the development of these sites should they be taken forward.

In our letter on the previous version of the Plan in February this year, we expressed our view that further work is necessary to understand the character of Drayton as part of the evidence base in order to be confident that the development of any of the sites identified for potential development would not be harmful to the special interest of the Conservation Area or the character of the village as a whole. Even if development on these sites was acceptable, we considered that a greater understanding of their contribution to the village might indicate what form of development would be preferable.

There were links in the appendix to our letter on the Sustainability Scoping Report to "Placecheck", "Building in Context", the "Oxford Character Assessment Toolkit" and "Understanding Place", all of which contain further information on local characterisation. We reiterate our offer that we would also be pleased to discuss characterisation with you and possibly help prepare a characterisation workshop.

We are disappointed and concerned therefore that there is no indication that any such characterisation has been undertaken or is planned to inform the Plan. Without this additional work we consider that the evidence base for the Neighbourhood Plan is inadequate.

We hope these comments are helpful. Please contact us if you have any queries.

Thank you again for consulting English Heritage on your Neighbourhood Plan.

Yours faithfully,



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