

21st February 2014

Thank you for your consultation in respect of this document.

DPDS Consulting is instructed to act on behalf of the Earl of Plymouth Estates who have significant landholdings in the parish of Drayton. As you are aware, along with land agents also acting on behalf of the Estate, we are engaged in dialogue with both the Vale of White Horse DC and Drayton Parish Council/Drayton 2020 in respect of their landholdings at Drayton Manor Farm and at Lockway. Both of these landholdings are addressed by the Neighbourhood Plan and, in principle, the approach embodied in the Plan is broadly supported.

As you are aware, a detailed Development Brief is being prepared for the Manor Farm site in consultation with both Drayton Parish Council/Drayton 2020 and VoWHDC. When complete this document will form the basis for guiding a detailed planning application for the site. It is requested that the Neighbourhood Plan should acknowledge this. In particular, the “possible layout” plan depicting the broad distribution of uses around the proposed Village Green is not entirely in accordance with the emerging Development Brief masterplan and it is respectfully suggested that this might be updated in the final version of the Neighbourhood Plan in the interests of consistency. We would be pleased to supply a suitable plan in due course. Notwithstanding these comments, we broadly support Policy P-LF1 and the supporting explanatory text.

Drayton2020: This possible layout plan will be updated in the next version of the Drayton NDP

I would also draw your attention to the need for your proposed Policy P-H8 – Contributions and Policy P-H9 – Use of Contributions – to be consistent with the legal requirements concerning both the use of Section 106 Agreements and the Community Infrastructure Levy Regulations 2010. The current Government advice on this matter is quite clear in that

“From the 6th April 2010 it has been unlawful for a planning obligation to be taken into account when determining a planning application for a development, or part of a development, that is capable of being charged the levy, whether there is a local levy in operation or not, if the obligation does not meet all of the following tests:

- (a) Necessary to make the development acceptable in planning terms
- (b) Directly related to the development: and
- (c) Fairly and reasonably related in scale and kind to the development.”

For all other developments (i.e. those not capable of being charged the levy), the policy in Circular 5/05 will continue to apply. “

[Paras. 62 and 63 The Community Infrastructure Levy - An Overview DCLG May 2011]

The spirit of this advice is also embodied in the subsequent and current CIL Guidance published by DCLG in April 2013. It should, therefore, be reflected in the policies and text of the Neighbourhood Plan which is required to conform to the Government’s planning policy as set out in the National

Planning Policy Framework and the related legislation as well as any adopted District wide Core Strategy/Local Plan where one exists.

Drayton2020: This is noted. A s106 Contribution Plan in line with these regulations will be developed for the next version of the Plan.

The Estate also welcomes your inclusion of the land at Lockway as a proposed housing site and look forward to holding further discussions with the Parish Council in respect of this land in due course.

Drayton2020: This is a misreading of the Plan. All sites around Drayton proposed under the VWHDC's IHSP have been assessed in the Drayton NDP. Some are scored more highly than others as suitable or not for housing development. The next version of the Plan will identify preferred sites.

We thank you for consulting us in respect of this matter and hope that you find the above comments helpful.

Kind Regards

Les Durrant

L M Durrant Dip TP MRTPI FRICS MInstD

Chairman and Managing Director

DPDS Consulting Group

Tel: 01793 501601

Fax: 01793 512436

www.dpds.com