

# Consultation response form

This is the response form for the consultation on the draft revised National Planning Policy Framework. If you are responding by email or in writing, please reply using this questionnaire pro-forma, which should be read alongside the consultation document. The comment boxes will expand as you type. Required fields are indicated with an asterisk (\*)

## Your details

First name*	Graeme
Family name (surname)*	Markland
Title	Neighbourhood Plan Continuity Officer
Address	Thame Town Hall High Street
City/Town*	Thame
Postal code*	OX9 3DP
Telephone Number	01844 212833
Email Address*	Graeme.Markland@thametowncouncil.gov.uk

Are the views expressed on this consultation your own personal views or an official response from an organisation you represent?\*

## Organisational response

If you are responding on behalf of an organisation, please select the option which best describes your organisation. \*

### Neighbourhood Planning Body / Parish or Town Council

If you selected other, please state the type of organisation

Click here to enter text.

Please provide the name of the organisation (if applicable)

Thame Town Council

## Chapter 1: Introduction

### Question 1

Do you have any comments on the text of Chapter 1?

No.

## Chapter 2: Achieving sustainable development

### Question 2

Do you agree with the changes to the sustainable development objectives and the presumption in favour of sustainable development?

No

Please enter your comments here

Paragraph 9. This section appears to be permitting policies within development plans to be wholly biased towards delivering one of the three sustainable objectives, such as the economic objective, without reference to the others. It is suggested that this is to cater for local circumstances. The Town Council, a front runner in neighbourhood planning, cannot see why the excellent principle of always seeking a combination of economic, social and environmental gains should be abandoned in order to align with what experience has shown, namely, that not every policy or aspect of a development can accord with all three objectives, in every case. To abandon this principle would permit local authorities or neighbourhood plan groups to develop strategies that were largely or wholly designed (for example) for social or economic gain against the benefit of the wider area or community.

Paragraph 11 a). The Town Council is unconvinced of the additional text "...and be sufficiently flexible to adapt to rapid change;". Given the new national methodology for calculating housing need the change in housing demand should not rise significantly within a local plan period of 5 years. The only other local circumstance that might apply is an allocation site not coming forward, or with sufficient speed. In defining the national methodology but not defining the extent of any means for demonstrating sufficient flexibility sound development plans may be challenged at examination. For example, should a LPA have a single reserve large allocation site, or that plus a range of small reserve sites to cater for circumstances when the large housebuilders suffer "difficult market conditions"?

### Question 3

Do you agree that the core principles section should be deleted, given its content has been retained and moved to other appropriate parts of the Framework?

**No**

Please enter your comments here

There would be value in retaining brief commentary that reiterates the importance of the core principles and signposts where they can now be found within the revised framework. These should then in turn be signalled as core principles.

#### **Question 4**

Do you have any other comments on the text of Chapter 2, including the approach to providing additional certainty for neighbourhood plans in some circumstances?

Paragraph 13. The clarification of the roles of the local planning authorities and neighbourhood planning groups is welcome.

Paragraph 14. Thame Town Council is surprised by the proposal that the policies of a neighbourhood plan should be held as less valid than those of a local plan. Together, the two plans form the development plan; by proposing through footnote 9 that only neighbourhood plans brought into force less than 2 years on or before the decision is taken is introducing a policy hierarchy that does not exist. This proposal, if passed as it is, will kill neighbourhood planning. No community will start a neighbourhood plan if they have to renew it – through referendum or otherwise – every two years, while the local plan whose strategic policies it delivers remains unchanged.

Communities should be rewarded for delivering required development, not punished. The town of Thame is aware that it has benefitted from the Written Ministerial Statement of December 2016, and for a neighbourhood plan area that has delivered the housing and employment required of it, and more, that is only just.

It is appreciated this proposal is an attempt by Government to force recalcitrant local planning authorities to meet their responsibilities. Pitting parish and town councils against their partner local planning authorities, and harming neighbourhood planning is not the best way of achieving this.

### **Chapter 3: Plan-making**

#### **Question 5**

Do you agree with the further changes proposed to the tests of soundness, and to the other changes of policy in this chapter that have not already been consulted on?

**No**

Please enter your comments here

Paragraph 36 b). It is suggested that the change in definition of justified from “the most appropriate strategy” to “an appropriate strategy” will not reduce work for the

local planning authority. Without a commitment to finding and proving the best strategy for their area, local plans will be even more prey to direct, local interference in order to further an authority or individual's local agenda, rather than the best option. The mere suggestion this might have taken place is likely to lead to challenges at examination that would have not otherwise taken place. No local authority would ever promote their plan as anything other than the best option, in any case; but the reality is that the proposed change would provide the leeway for "an appropriate option", to quickly become "any option".

## Question 6

Do you have any other comments on the text of chapter 3?

Paragraph 15. The re-emphasis on how the planning system should be plan-led is welcome.

Paragraphs 20 – 29. It is felt too much emphasis is being placed on the production of strategic, rather than local plans. When producing a strategic plan it is vital that the list of strategic needs is linked through a coherent plan. This must go further than merely identifying a strategy for the pattern and scale of development. There must be a clear vision and identified objectives, and the inter-relationship between housing and retail, employment, parks and leisure, etc., understood. As written it would be possible to produce a list of needs and present it as a strategy. This would not contribute to place-making.

The ability to produce a strategy may suit in very rare circumstances, but it is felt that strategic policies are best presented within a Local Plan that can explain the reasoning behind policies, the links between strategic or non-strategic allocations and how the whole contributes to a vision of how a community wishes to grow. Local Plans are also important in providing the land use element of local authority corporate plans, which frequently seek to tackle issues such as health, income or education inequality. Their role should not be degraded.

Paragraph 21. The proposal to clarify strategic policies is welcome, particularly in relation to cross-boundary issues.

Paragraph 23. It would help to clarify that when seeking a review of policies of at least once every five years, this would either include or not include neighbourhood plan policies.

Paragraphs 26 – 29. The general move to promote transparency around joint working between stakeholders local authorities is welcome. The production of statements of common ground should not however replace the need for local authorities to provide all documentation and correspondence on joint-working issues to the Inspector at examination. The high bar that has been set at examination has promoted beneficial, joint activity at the strategic level.

## Chapter 4: Decision-making

### **Question 7**

The revised draft Framework expects all viability assessments to be made publicly available. Are there any circumstances where this would be problematic?

**No**

Please enter your comments here

The Town Council is unaware of any development where problems could be caused by making viability assessments publicly available. It is felt that this would introduce a significant degree of transparency to an otherwise impenetrable area of development planning.

### **Question 8**

Would it be helpful for national planning guidance to go further and set out the circumstances in which viability assessment to accompany planning applications would be acceptable?

**Yes**

Please enter your comments here:

There is no reason why viability assessments are not available for every development involving the net gain of a dwelling. All developers, regardless of scale, produce viability assessments in order to work out if there is profit in their scheme, once costs and obligations are calculated.

### **Question 9**

What would be the benefits of going further and mandating the use of review mechanisms to capture increases in the value of a large or multi-phased development?

Please enter your comments below

Does this question refer to the subsequent claw back of increased value as a consequence of, for example, rising house prices on the lengthy build out of a large scheme? If so, then clear, unequivocal review mechanisms would be helpful for two reasons: a) that developers may be less likely to trickle out development, stretching 5-year builds to 10 or 20; b) it would make communities feel less cheated and more likely to engage with planning and the plan making process.

### **Question 10**

Do you have any comments on the text of Chapter 4?

The whole chapter is geared towards the mechanisation of planning applications. The planning authority is told to encourage pre-application discussion and consultation, but cannot necessarily require it. The decision maker and statutory stakeholders must focus on processing applications in a timely manner. Voluntary

planning performance agreements are encouraged; yet they are all about speed and ensuring an effective application process, i.e., one where time constraints come first.

Consideration of issues such as design, or the transport implications of developments are held within separate chapters of the Framework. They now seem disassociated from the development management process. Where is the emphasis on the quality of decision making and joined up place making that communities deserve?

## Chapter 5: Delivering a wide choice of high quality homes

### Question 11

What are your views on the most appropriate combination of policy requirements to ensure that a suitable proportion of land for homes comes forward as small or medium sized sites?

Please enter your comments here

The proposed approach of ensuring at least 20% of allocated sites are of half a hectare or less is problematic in the extreme. Thame Town Council knows of no such site that has been promoted for development within its parish. Most land around and within Thame that is suitable or even half-suitable for development is already optioned as part of large land parcels. Qualifying sites are few and far between, and tend to arise as windfall opportunities, or infill within rural settlements.

As the policy is currently written, a local planning authority need only allocate 5 housing sites; 4 large, and one small, to meet the criteria. Should the 20% proposal be seen as 20% of housing required, plan making would grind to a halt across the country as planning authorities, depleted of staff, searched for suitable sites; the subsequent examinations of their plans would be similarly affected as site allocation discussions dissolve into lengthy debate about sites that would only yield a few homes.

Local authorities should not be forced into a small-site approach where they can demonstrate that negative outcomes would result. For example, infill or intensification can lead to significant problems for education, health and social service authorities, the local road network, the wider strategic road network, air quality, etc., within just a few years. The Town Council feels there is value in demanding that small sites are investigated thoroughly as part of the plan-making process but arbitrary targets should be avoided. The most effective way of ensuring that small sites are taken into account would be through area-wide searches, or character assessments of townscapes and settlements in order to establish what can fit in terms of sustainability, and where.

### Question 12

Do you agree with the application of the presumption in favour of sustainable development where delivery is below 75% of the housing required from 2020?

**No**

Please enter your comments here

The Government has already sufficiently ensured that it is in a local authority's interest to ensure an adequate supply of housing land. The Town Council believes that in imposing a target that punishes communities for the failure of the private sector to develop sites would be perverse and unjust, and serve only to bring both the planning and development sectors into further disrepute. The Town Council has witnessed developers who commit from start through to completion, and fulfil their social obligations; and it has seen those who prevaricate, procrastinate, and seek change only in the interest of further profit, with benefit continually lost to the local community. The Town Council cannot force a foot-dragging developer to build, and neither can the local authority. They do not have the powers and, after the implementation of the proposed framework, would still not have any power. The Government's approach in continuing to punish the community in these circumstances is not suggestive of a body that is truly committed to providing the right homes in the right place.

### **Question 13**

Do you agree with the new policy on exception sites for entry-level homes?

**No**

Please enter your comments here

As the Town Council does not support the blanket principle of entry-level homes it is unable to comment on the policy for exception sites. Entry level homes for purchase or affordable rent are of little use in areas where house prices and rents outstrip average incomes with the ratios seen in South Oxfordshire. Homes for affordable rent are being built in Thame now, but potential residents tell us the "affordable" rents are simply unmanageable. Under these circumstances, a different model must be provided, based upon a percentage of the income of the intended occupant. The Town Council would support exception sites on that basis.

### **Question 14**

Do you have any other comments on the text of Chapter 5?

The Town Council is keenly aware that a successful community depends not just on identified key workers such as police, fire, nursing and teaching staff, but also on teaching assistants, PCSOs, health and leisure centre staff, and shopworkers. These people are essential in contributing to a vibrant, productive and happy town. Yet there is little in the housing chapter to comfort these people. With the Framework's current and proposed definitions of affordable housing it seems we will be unable to offer the local community any hope for truly affordable housing for the foreseeable future. Small shared ownership homes in Thame are costing the occupants £1,500 per month, or £18,000 a year, which is 75% of the average local wage. Affordable rents are similarly unaffordable. Local businesses

tell us of their trouble in recruiting staff; house prices are always the number one reason given for that difficulty. Other initiatives based on a value reduced by a percentage will similarly fail to make a dent in local need.

The Framework must introduce a definition for affordable housing that is based upon post-tax, average local incomes. This opportunity for significant change should not be missed.

Paragraph 67. The proposal that neighbourhood plan groups could obtain indicative figures from their local planning authorities will not work in areas where there is dispute about the calculation method used. The suggested approach in paragraph 67 for example uses a formula-based approach based on the local population, housing need and a recent planning strategy. This will be open to legal challenge. The Town Council believes that any interim, or permanent approach must take into account the capacity of a settlement to adsorb further growth, in order to be sound.

Paragraph 69 d). Will this be effective, without strong policies within a development plan? What does the local planning authority have in order to persuade a developer to do this? Experience has shown that developers build at a rate that is guaranteed not to disturb local housing values, unless they be in an upwards direction.

Paragraph 77. Local planning authorities have no powers over the completion rates of building sites; the associated recommendations in paragraph 78 are of little use. Once the LPA has assessed why an earlier permission did not result in built houses, what then? The Government must give LPAs usable authority, if they truly believe that increasing house building will increase choice in the market and reduce prices.

General comment: This chapter should provide real leadership, and show real commitment to delivering more homes, many of which should be genuinely affordable. It is instead obsessed with numbers and speed, focuses for example on developing small sites while suggesting an ineffective methodology and does nothing that will yield what the Town Council knows people want and deserve: quality, affordable homes in pleasant surroundings, with good links to local facilities. Thame may well see substantial development proposals through the Oxfordshire Growth Deal and the proposed Oxford-Milton Keynes-Cambridge corridor, yet the document that should provide the framework for this and similar nationally important projects merely states within just one paragraph how lots of homes might be best be provided on very big sites. This is inadequate, ineffectual, and as the national policy framework for the future of housing for a major economy, embarrassing.

## Chapter 6: Building a strong, competitive economy

### Question 15



Do you agree with the policy changes on supporting business growth and productivity, including the approach to accommodating local business and community needs in rural areas?

**Please select an item from this drop down menu**

Please enter your comments here

[Click here to enter text.](#)

### **Question 16**

Do you have any other comments on the text of chapter 6?

No.

## **Chapter 7: Ensuring the vitality of town centres**

### **Question 17**

Do you agree with the policy changes on planning for identified retail needs and considering planning applications for town centre uses?

**Yes**

Please enter your comments here

[Click here to enter text.](#)

### **Question 18**

Do you have any other comments on the text of Chapter 7?

No.

## **Chapter 8: Promoting healthy and safe communities**

### **Question 19**

Do you have any comments on the new policies in Chapter 8 that have not already been consulted on?

No.

### **Question 20**

Do you have any other comments on the text of Chapter 8?

No.

## Chapter 9: Promoting sustainable transport

### Question 21

Do you agree with the changes to the transport chapter that point to the way that all aspects of transport should be considered, both in planning for transport and assessing transport impacts?

**No**

Please enter your comments here

Paragraph 103 a). It is important that impact and connectivity issues are understood from the earliest stages of plan making. Thame Town Council recommend this text is changed to “the potential and collective impacts of development proposals on transport networks can be addressed. The interaction of development proposals should be considered as a whole in order to understand connectivity issues and associated infrastructure needs;”

### Question 22

Do you agree with the policy change that recognises the importance of general aviation facilities?

**Not sure**

Please enter your comments here

Paragraph 105 f). Thame Town Council perceives a risk that in recognising the importance in maintaining a national network of general aviation facilities it would serve to lessen the importance of specialist flight facilities and airfields used by clubs for both fixed and rotary wing aircraft, training or emergency facilities, or experimental use.

### Question 23

Do you have any other comments on the text of Chapter 9?

No.

## Chapter 10: Supporting high quality communications

### Question 24

Do you have any comments on the text of Chapter 10?

No.

## Chapter 11: Making effective use of land

### Question 25

Do you agree with the proposed approaches to under-utilised land, reallocating land for other uses and making it easier to convert land which is in existing use?

**No**

Please enter your comments here

Paragraph 121. No. This would lead to the active promotion of quality employment land and floorspace. Each applicant would argue their site is not important in key economic sectors (which we note are not defined, thus furthering confusion). Thame has already lost through permitted development and associated loss floorspace that HCA guidelines show would require over 6 ha's worth of land to replace. It is foolish to purposefully harm sustainable settlements and force existing and new occupants to make costly and unsustainable journeys to displaced areas of employment.

Paragraph 121 b). This policy is high risk. School land for example can be the most difficult to find and fund in development terms. This is especially true for schools in or adjacent to town centres. A school in Thame is currently undergoing a significant estate renewal and expansion plan, which has only been made possible by having small areas of open space in which to operate internal land swaps. Certain hospital buildings enjoy a relatively short life, as requirements, needs and treatments change. These community services should not be pressured into intensification plans or giving up areas of land where to do so would risk the long term viability of the service on the site.

### Question 26

Do you agree with the proposed approach to employing minimum density standards where there is a shortage of land for meeting identified housing needs?

**No**

Please enter your comments here

Paragraph 123. The use of minimum density standards should not be considered without at least insisting upon the investigation of a linked need for maximum density standards. This would help set a starting point for density adjacent to town centre conservation areas for example, while still protecting the amenity of both areas. Similarly, areas with good transport connectivity might also require both a minimum and a maximum density standard in order to prevent transport, health and education services from overcrowding.

### Question 27

Do you have any other comments on the text of Chapter 11?

No.

## Chapter 12 : Achieving well-designed places

### Question 28

Do you have any comments on the changes of policy in Chapter 12 that have not already been consulted on?

No.

### Question 29

Do you have any other comments on the text of Chapter 12?

No.

## Chapter 13: Protecting the Green Belt

### Question 30

Do you agree with the proposed changes to enable greater use of brownfield land for housing in the Green Belt, and to provide for the other forms of development that are 'not inappropriate' in the Green Belt?

**Not sure**

Please enter your comments here

[Click here to enter text.](#)

### Question 31

Do you have any other comments on the text of Chapter 13?

No.

## Chapter 14: Meeting the challenge of climate change, flooding and coastal change

### Question 32

Do you have any comments on the text of Chapter 14?

No.

### Question 33

Does paragraph 149b need any further amendment to reflect the ambitions in the Clean Growth Strategy to reduce emissions from building?

**Not sure**

[Click here to enter text.](#)

## Chapter 15: Conserving and enhancing the natural environment

### Question 34

Do you agree with the approach to clarifying and strengthening protection for areas of particular environmental importance in the context of the 25 Year Environment Plan and national infrastructure requirements, including the level of protection for ancient woodland and aged or veteran trees?

**Not sure**

Please enter your comments here

[Click here to enter text.](#)

### Question 35

Do you have any other comments on the text of Chapter 15?

No.

## Chapter 16: Conserving and enhancing the historic environment

### Question 36

Do you have any comments on the text of Chapter 16?

No.

## Chapter 17: Facilitating the sustainable use of minerals

### Question 37

Do you have any comments on the changes of policy in Chapter 17, or on any other aspects of the text in this chapter?

No.

### Question 38

Do you think that planning policy in minerals would be better contained in a separate document?

No

Please enter your comments here

[Click here to enter text.](#)

### Question 39

Do you have any views on the utility of national and sub-national guidelines on future aggregates provision?

No

Please enter your comments here

[Click here to enter text.](#)

## Transitional arrangements and consequential changes

### Question 40

Do you agree with the proposed transitional arrangements?

Not sure

Please enter your comments here

[Click here to enter text.](#)

### Question 41

Do you think that any changes should be made to the Planning Policy for Traveller Sites as a result of the proposed changes to the Framework set out in the consultation document? If so, what changes should be made?

Not sure

Please enter your comments here

[Click here to enter text.](#)

### Question 42

Do you think that any changes should be made to the Planning Policy for Waste as a result of the proposed changes to the Framework set out in the consultation document? If so, what changes should be made?

**Not sure**

Please enter your comments here

Click here to enter text.

## Glossary

**Question 43**

Do you have any comments on the glossary?

No.