

Full Council

Title:	Levelling Up and Regeneration Bill: Reform to National Planning Policy Framework
Date:	28 February 2023
Contact Officer:	Graeme Markland, Neighbourhood Plan Continuity Officer

Background

1. The Government announced on 22 December 2022 a combined consultation on proposed updates to the National Planning Policy Framework (NPPF), the national planning policy guidance document for England, and the key proposals for planning policy arising from the Levelling Up and Regeneration Bill (LURB). The LURB is currently at Committee stage in the House of Lords. Mention is also made of subsequent reviews to national planning policy which are not covered here.
2. The scope of the review is wide, and the comments below primarily relate to matters of interest to Thame. Some of the proposed changes could have significant outcomes.

Changes Proposed

3. The Government's ambition appears clear. The proposals cover changes to further encourage Local Planning Authorities (LPAs) to be proactive in delivering and maintaining up to date Local Plans, with the review at Examination requiring less scrutiny.
4. There are some limited proposals that will / may help local communities to have greater confidence in undertaking / updating neighbourhood plans and providing for local housing needs.
5. There are proposed new powers for the Secretary of State for Levelling Up, Housing and Communities which would enable them to make significant changes to policy and guidance without reference to consultation or the parliamentary process. This represents a fundamental shift that threatens to remove independence of thought and practice at the local level and undermine the ability of LPAs to respond to their own, unique local circumstance and challenges.
6. The proposed changes have been outlined in the two tables below. Their main impacts are considered, and potential summary responses are proposed.

Recommendation

7. It is recommended that Members approve the attached comments as the basis for the Town Council's response to the most recent proposed reforms to national planning policy.

Proposed changes to National Planning Policy Framework, December 2022

Proposal	Detail	NPCO Commentary	Proposed TTC Response
Character test for developers	<p>The Government wishes to make developers more accountable for their behaviour. The type of activity they wish to reduce or eliminate includes the breach of planning controls and not delivering their legal commitments to communities.</p> <p>Two means are proposed: 1 – making such behaviour a material consideration when LPAs decide planning applications. 2 – allowing LPAs to decline applications from those who have a track record of irresponsible behaviour.</p> <p>A call has also been made for alternative mechanisms.</p>	<p>Attention in this matter is required. Councillors and members of the public frequently complain that we are unable to penalise developers who act unreasonably and who do not meet their legal obligations.</p> <p>The proposals will require new primary legislation and so will not be brought forward in this round of NPPF review.</p> <p>Either of the proposed options would impact on the workload of local Enforcement Teams; Option 1, as there would be interest in recording every breach / failure to meet commitments and Option 2, as they would be relied upon to provide hard evidence to failures. This is the most hard-pressed of all the planning services, with difficulty in recruitment due in part to the very high workloads. It will be worth noting they will require additional resources.</p> <p>Members may wish to consider alternative means of encouraging better behaviour.</p>	<p>The experience of Thame Town Council and the Town's residents, including residents from our new housing estates, demonstrates that both of these options are appropriate and reasonable responses. It has been particularly frustrating to residents who have been living within their new homes for some years that community infrastructure such as allotments, roads, pathways and landscaping has not been delivered yet see the same developers seeking new permissions on adjacent land.</p> <p>It is suggested that consideration be given to the resourcing of local Planning Enforcement Teams, who would bear much of the responsibility for monitoring and recording evidence of developer activity.</p>
Housing - build out rates	<p>Proposals have been made to improve the monitoring of housing delivery on sites.</p> <p>Housebuilders will be required to issue a commencement notice when they start.</p> <p>LPAs will have streamlined powers to issue a completion notice, which would in effect remove permission from any incomplete sites once a notice period has elapsed.</p>	<p>We are asked to comment on the 3 build-out measures (A – C).</p> <p>The issuing of commencement notices will help monitoring bodies such as LPAs and infrastructure providers in their roles. The requirement to submit annual reports is similarly welcome, though there may have to be an appropriate penalty declared for non-returns.</p> <p>The ability to refuse the grant of permission on land to a developer benefitting from an existing permission</p>	<p>The Town Council supports the proposed and anticipated measures but suggest that LPAs be given guidance on deciding appropriate deliver rates for trajectories. The Council has concern over the resource implications for authorities who may have to verify the reasons given by developers for delays in meeting anticipated build-out rates.</p> <p>The proposal to give LPAs the ability to refuse planning applications to developers on sites where they benefit from existing permissions should be particularly encouraged on allocation sites. This</p>

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	<p>Developers will have to submit annual reports to LPAs on their delivery against proposed trajectories.</p> <p>LPAs will be able to refuse granting new permissions to developers who fail to build earlier permissions granted on the same land.</p> <p>In return, LPAs will be expected to improve their performance in processing applications and discharging conditions.</p> <p>To assist these proposals, the Government intends to:</p> <p>A – publish data on developers on sites over a certain size, where they fail to build out their commitments B – developers will have to explain how they will increase the diversity of housing tenures to maximise the rate at which homes are sold / occupied C – the NPPF will highlight that delivery can be a material consideration in planning applications, thus enabling refusal if delivery projections are considered too slow.</p> <p>Finally, a future consultation will consider financial penalties for slow delivery.</p>	<p>may help reduce poor behaviour seen across the Country, and Thame. It is suggested we request this be rigidly enforced on allocation sites to give confidence to communities undertaking local and neighbourhood plans.</p> <p>A problem also exists with the issuing of completion notices by developers as there is no time by which a LPA must be notified of a completion. The proposals would appear to deal with this issue, too.</p> <p>It is recommended that the Town Council support the proposals as long as guidance is issued on how a LPA can judge delivery rates proposed in delivery trajectories.</p> <p>Concern arises over the ability of LPAs to monitor and enforce. For example, a developer may claim delays in build due to the availability of materials or labour which would need verifying by the LPA before they take action.</p>	<p>would help give communities confidence in making local and neighbourhood plans.</p>
Mansard rooves	<p>Under making effective use of land, text is proposed that would allow for mansard roof extensions “where their external appearance harmonises with the original building, including extensions to terraces where one or more of the terraced houses already has a mansard”.</p>	<p>This is an unusual level of detail for a national policy to focus on. It is an extension to the Government’s “gentle densification” initiative for urban areas. It does, however, appear to go beyond the proposals within paragraph 11e) and permit upward extensions in places where there would be no existing, higher roof form to compare it to.</p>	<p>This proposal as written would allow for mansards to be placed on buildings without existing, higher roof forms to compare it to. This would be inappropriate in many circumstances, may conflict with local design codes and will undoubtedly lead to friction within communities. The text is, however, written with little room for discretion for the LPA.</p> <p>It is an atypically detailed policy that is out of place within national policy. The proposal should be removed or amended</p>

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			to be advisory and not be applicable to Article 2(3) land or heritage assets.
Positively prepared – the removal of the Duty to Cooperate, the assumption OAN will be met.	<p>The development plan should provide a strategy which seeks to meet the area’s objectively assessed needs so far as possible, taking all the NPPF policies into account.</p> <p>Deleted is the text requiring agreements with other authorities so that unmet needs from neighbouring areas can be accommodated in others, wherever it would be practical / sustainable development. This is presumably intended to align with the removal of the Duty to Cooperate enabled through the LURB.</p>	<p>For the moment, the Duty to Cooperate is retained. This would be replaced in time by an “alignment policy” in a later NPPF which would require some level of agreement and consistency.</p> <p>The Duty to Cooperate (DtC) rarely functioned well and its loss in many places (Thame included) may not be noticeable. The vagueness over what will replace it is, however, concerning.</p>	Express concern over the lack of detail on how alignment policies will be agreed and made and if they will receive scrutiny at examination.
Justified – removing the need to demonstrate the plan is an appropriate strategy	Any plan currently must demonstrate that it is an appropriate strategy, taking into account reasonable alternatives, based on proportionate evidence.	<p>This has already been watered down from the “most appropriate” strategy.</p> <p>This area of work has led to frustrated claims that enormous evidence is required to prove a strategy is reasonable and that its value is questionable.</p> <p>It is, however, essential that Councils and their residents can see that a strategy is appropriate and has been compared with other alternatives. The removal of this could undermine confidence in the planning system and the strategy within plans.</p> <p>The proposed alternative is to assess whether the LPA’s proposals meet needs, takes into account other policies in the Framework and will be effective and deliverable. There is a risk that an issue that is currently front-loaded with the bulk of the work taking place prior to each plan’s Examination in Public will be</p>	<p>It is proposed the Town Council expresses a sympathy with the wish to reduce the demands on under resourced planning departments. It does, however, believe that the current test of soundness, when properly undertaken, can provide communities with confidence that a proposed approach is reasonable, through the test against relevant alternatives.</p> <p>The removal of the test would also remove one element of the test of soundness that is currently delivered ahead of a plan’s examination. There is a risk that matters will have to be addressed at examination, anyway, in order to resolve objections over the chosen strategy and allocation site issues.</p>

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<p>Housing – flexibility over housing need calculations</p>	<p>There is clarification that LPAs should meet as much housing need as possible with an appropriate mix of housing types.</p> <p>The starting point will be the standard method for establishing local housing need, as before. The standard method would become advisory with exceptional circumstances relating to the particular characteristics of an authority justifying an alternative approach which must still heed demographic trends and market signals.</p> <p>Examples of particular characteristics are given as islands with high proportions of elderly residents, or university towns with above-average proportions of students.</p>	<p>backloaded and disrupt the Examination.</p> <p>There is not much difference between the old and new version of this policy. Extra text now includes the words “advisory starting-point” when referring to the standard method.</p> <p>There was always flexibility to use an alternative means of calculating housing need, as long as it could be justified. New text provides obvious clarification, namely that the reason must involve particular characteristics of an authority (it is assumed authority area is meant).</p>	<p>The proposed clarification regarding the circumstance under which an authority can depart from the standard method is welcome. It is not clear, however, if the particular characteristics of an authority mentioned in new paragraph 61 refer to an (Local Planning) authority, or the authority’s area, or both. It is suggested that this is made clear.</p>
<p>Housing - Green Belt</p>	<p>Green Belt boundaries do not have to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period.</p>	<p>As written within the draft NPPF, this does not quite align with the intention expressed within the accompanying explanatory document. This states: “Second, through a change to the Framework’s chapter on protecting Green Belt land, we propose to make clear that local planning authorities are not required to review and alter Green Belt boundaries if this would be the only way of meeting need in full” (emphasis added for clarity).</p> <p>Allowing a LPA to avoid a Green Belt review would force all Objectively Assessed Need (OAN) for housing, and potentially other uses outside of Green Belt areas. For plan-making, this will lead to challenge from both within and across LPA boundaries as development and allocations are forced to non-Green Belt areas.</p> <p>This may force development into less sustainable areas and increase long-distance commuting.</p>	<p>As written within the draft NPPF paragraph 142, the wording can be read to imply that Green Belt boundaries would not have to be revised if it was the only way of meeting the LPA’s <u>whole</u> OAN for housing. The explanatory text appears to suggest wording should be added, e.g.: “Green Belt boundaries are not required to be reviewed or altered if this would be the only means of <u>fully</u> meeting the objectively assessed need for housing over the plan period”.</p> <p>The Town Council believes that Green Belt reviews are essential to test for options that are more beneficial in terms of sustainability. Reviews are also required for clarity so that communities either within or outside boundaries can have confidence that LPAs have properly assessed if all possible areas can meet OAN for development.</p>

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Housing - the impact of density on character areas	To consider design guides and codes when meeting housing need. If meeting the housing need in full would require development at a density out of character with the existing area it could be considered an adverse impact.	<p>This test would logically be applied to infill within an identified character area / area with an existing density. This should help avoid high densities being proposed in order to meet objectively assessed needs.</p> <p>However, it could remove flexibility to increase densities around train stations and travel hubs.</p>	This is presumed to apply to infill / development within existing character areas. The clarification that cramming is not a valid solution to meeting objectively assessed needs is helpful but advice on how to treat low density areas around train stations and other transport nodes will be required.
Housing - evidence of past over-delivery	Where homes can be shown to have been over-delivered against a housing requirement from an existing plan, the over-delivery can be deducted from the overall requirement.	<p>This does not mean that windfall sites will displace allocation site mix and tenures. Allocations tend to be safer options that remain attractive to build out.</p> <p>While no doubt assisting with the delivery of housing, the existing accounting methodology is seen as illogical and harmful by councillors and communities.</p> <p>The amended Housing Delivery Test would make it likely that LPAs would still aim for a healthy supply of sites and permissions.</p>	Support this proposal. While potentially reducing the number of homes proposed through plans, it could provide greater confidence in their production and adoption.
Housing - 5-year housing land supply test removed	<p>Where a local plan contains a housing requirement that is less than 5 years old, there would be no need to demonstrate a 5-year supply of housing land.</p> <p>Also removed is the need to build in buffers for choice and competition in the market or to take account of market fluctuations or past under-delivery, which gave up to an extra year's requirement on top.</p> <p>Where delivery falls below 75% of the previous 3 years' requirement, the presumption in favour of sustainable development would apply – unless the LPA can demonstrate permissions</p>	<p>An annual position statement will still be required to be compared against the Housing Delivery Test. Any penalties would be applied the day after the Housing Delivery Test results are published by the Government.</p> <p>This is a major concession, but not a get out of jail card for LPAs; they will still be required to maintain a healthy supply of sites and permissions, particularly in areas with historic slow housing delivery.</p> <p>There is an opportunity to comment on the 115% figure, which is based on DLUHC work that showed the number of</p>	<p>General support, with commentary to suggest this provides a better balance between ensuring a conveyor belt of sites against market fluctuations, developer behaviour etc. beyond the LPA's control.</p> <p>The DLUHC's method of counting applications that are not progressed or are revised (presumably on sites offering a net gain of housing) will artificially inflate the number of "failed" housing applications as it is not uncommon for a site to have more 2 or more extant applications / revisions for alternative housing development.</p> <p>Applications are considered "live" by LPAs until it is clear which application or revision</p>

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	<p>totalling at least 115% of the LPA's housing requirement over the applicable Housing Delivery Test period.</p>	<p>permissions not progressed or are revised is 15% (it is not assumed but not stated that these are permissions giving a net gain in housing).</p> <p>It will be worthwhile pointing out to DLUHC that their 15% figure will have over counted permissions and should be set lower.</p>	<p>is being built out, at which point all but one becomes superseded. Non-delivery of <i>sites</i> provides a more accurate assessment, meaning 105% would provide both a fairer and more accurate uplift.</p>
<p>Beauty – policies and decisions</p>	<p>Planning policies and decisions should aim to achieve healthy, inclusive and safe places and beautiful buildings...</p> <p>Chapter 12 is now titled “Achieving well-designed <i>and beautiful places</i>”</p> <p>The primary means of improving the design of development should be through local design codes, in line with the National Model Design Code.</p> <p>LPA's should ensure that relevant planning conditions refer to clear and accurate plans and drawings that provide visual clarity about the design of the development and are clear about the use of materials where appropriate, to make enforcement easier.</p>	<p>A building or place that has a high-quality design, constructed from quality materials and with appropriate landscaping may not be beautiful! Buildings and places can be impressive yet not beautiful; a brown roof, for example, may not be beautiful but provide a very important habitat.</p>	<p>Planning policies can conflict. Taking as an example the proposal that policies and decisions should deliver beautiful buildings, one with a brown roof that provides a much-needed habitat may not be beautiful or capable of being made beautiful. The desire to improve the quality of design of both places and buildings is admirable but it should be clarified that other policies must be taken into account, too.</p> <p>The emphasis on the provision of clear plans to provide clarity and aid enforcement is welcome.</p>
<p>Neighbourhood plans – presumption in favour of development, dropping the link to the LPA's housing land supply and housing delivery test.</p>	<p>Where the neighbourhood plan contains policies and allocations to meet its identified housing requirement, give neighbourhood plans 5 years' protection from the presumption of sustainable development being applied.</p> <p>The test would be taken from the date on which the neighbourhood plan became part of the development plan.</p>	<p>The increase from 2 to 5 years is very welcome and should act as a spur for communities to undertake / renew neighbourhood plans.</p>	<p>Support, with commentary to explain how this should encourage the uptake, refresh and renewal of ageing neighbourhood plans.</p> <p>Clarity is required for situations where neighbourhood plan areas have not been given a housing requirement by their LPA.</p>
<p>Energy efficiency</p>	<p>To support energy efficiency improvements significant weight should be given to support the adaption of buildings, particularly non-domestic buildings, to improve their energy</p>	<p>This is a matter we hope to address at least in part for domestic properties in Thame within TNP2. Consideration will be given to the visual and amenity impact of energy efficiency projects and</p>	<p>The principle is supported but more attention could be drawn to the type of energy efficiency improvements that would be acceptable within character and conservation areas, and on listed</p>

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	<p>performance (including through the installation of heat pumps and solar panels where these do not already benefit from permitted development rights).</p> <p>Proposals affecting conservation areas and listed buildings should also take into account the policies set out in Chapter 16 of the NPPF (the latter covers the conservation and enhancement of the historic environment).</p>	<p>those that adapt buildings to prepare for climate change.</p> <p>The proposals could include commentary on domestic properties.</p>	<p>buildings, within local design code documents.</p> <p>This is seen as important given the potential for energy efficiency measures to include external cladding, raised roof heights, sun shades and even landscape planting.</p>
Onshore Wind	<p>It seems there would be two proposed means for wind turbines to be brought through the planning system.</p> <p>With evidence of community support and that planning impacts have been overcome, wind turbines can be granted permission through Local Development Orders, Neighbourhood Development Orders and Community Right to Build Orders.</p> <p>Areas that have been found to be suitable for wind energy development within a development plan or supplementary planning document can be granted permission for wind turbines as long as consultation demonstrates that planning impacts have been addressed and the community supports the proposal.</p>	<p>The near moratorium on onshore wind development in England appears to have been dropped. Planning impacts will now have to be satisfactorily addressed, not fully addressed; but community support remains essential. This does now give communities who would support wind turbine schemes the ability to bring them through the planning system. It is declared within the explanatory document that 78% of the population (UK population?) support onshore wind.</p> <p>There will be further consultations held on how supportive communities can receive benefits from the implementation of onshore wind developments.</p>	<p>Giving communities flexibility to consider onshore wind developments in their area, subject to appropriate planning control and evidence of community support is welcome.</p>
Housing - prioritise social rent	<p>Proposal to amend national policy to attach greater weight to social rent in planning policies and decisions.</p> <p>Suggestions for mechanisms to do so are requested.</p>	<p>The Government notes housing for social rent as being the most affordable model and is looking for ways to increase the quantity delivered.</p> <p>TNP2 evidence notes that social rent is the most affordable housing model in Thame but competing models are advanced by the First Homes Guidance Note and local policy. Greater emphasis on social rent would allow for more affordable housing for rent to be front</p>	<p>Support the proposal, as other affordable housing models are much costlier and beyond the income of many local residents despite our area being considered relatively affluent.</p> <p>Propose as a solution that aside from the minimum 10% of affordable homes being set aside for affordable home ownership, development plan policy be permitted to require up to 90% social rent, based on demonstrable evidence from up-to-date</p>

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		loaded ahead of affordable housing for sale.	housing needs assessments, and that LPAs be encouraged to consider flexible models that change with delivery.
Housing – community-led housing	<p>Under the section on rural housing text has been added that states that planning policies and decisions should reflect local needs “including development proposals from community-led housing groups”.</p> <p>A new entry for community-led developments has been added into the glossary: “Community-led developments are those that are driven by non-profit organisations that are owned by and accountable to their community members. The community group or organisation owns, manages or stewards the homes and other assets in a manner of their choosing, and this may be done through a mutually supported arrangement with a Registered Provider that owns the freehold or leasehold for the property. The benefits to the specified community are clearly defined and legally protected in perpetuity.”</p>	<p>Thame Town is no longer a rural area, but a community-led housing development should be considered in the same light as those in rural areas. While SODC were supportive of the Thame Community Land Trust’s proposals it would be worth requesting that similar support is given to community-led schemes in urban areas.</p> <p>Members may wish to consider the definition given within the glossary, which appears to offer a suitable explanation of what a community-led development is.</p>	<p>Support, but note that urban areas have community-led initiatives within them and that they would benefit from a similar level of support. It may help to draw up specific criteria that LPAs can respond to.</p> <p>Support the change to the NPPF glossary to include a definition for community-led developments.</p> <p>It is suggested that mandatory training for planning authority and housing team staff be given and policies and procedures be encouraged to ensure community-led housing groups receive the support they need. In return community-led housing groups could agree to meet defined standards for administration and sign Memoranda of Understanding / Service Level Agreements with local authorities.</p> <p>Support the proposed change to the NPPF glossary to include community-led developers in the definition of “affordable housing for rent”.</p> <p>There is a divergence in government in that Discount Market Sale (DMS) housing is not regarded as an appropriate model by Homes England, yet is approved as 'First Homes' by the DLUHC. DMS must be given the same status as First Homes but obvious with protection on mortgagee in possession clauses for community groups.</p> <p>As an aside, a further hindrance to community-led housing schemes is that government funding for rental and shared ownership has to be received by Registered Providers (RPs) or be in association with them. RPs are not</p>

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			interested in every community-led site, meaning it can be impossible to access this funding.
Housing – sites for small builders	<p>It is currently a requirement of the NPPF that Local Planning Authorities (LPAs) identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, unless evidence suggests this cannot be met.</p> <p>This is a policy designed to encourage small developers but there is dialogue to suggest this has not been effective. Views are sought on its effectiveness and how this policy could be strengthened, particularly on sites that will deliver high levels of affordable housing.</p>	<p>The relative lack of SME building firms is a key reason why the Government is struggling to meet its housing targets. Such builders have traditionally sought, promoted, and built out sites not attractive to the major companies.</p> <p>The Government is seeking initial views on this problem. Policy means would, ideally, encourage the formation of SMEs rather than the further involvement of the larger firms.</p> <p>Currently, it is suggested that area-wide design assessments and Local Development Orders be used. The former may be considered too vague for mixed character areas, while the latter may be too resource-intensive.</p>	Ideas could include setting criteria-based policies for infill, back land or brownfield sites to bring certainty of availability and guidance on the quantum, type and mix of units deemed suitable.
Local and Neighbourhood Plans – existing framework	<p>Neighbourhood plans, local plans and minerals and waste plans will be examined under the existing plan-making framework until 30 June 2025.</p> <p>SPDs adopted as part of a plan will cease to have effect from the point at which a new style plan should be in place.</p> <p>Long term, the intention is that LPAs will be required to start the update of their plans 5 years from the date of their adoption with new plan taking no more than 30 months to prepare and adopt.</p> <p>Neighbourhood plans that are made before the new system comes into place will remain extant until they are replaced.</p>	<p>It is likely that LPAs will look to refresh their plans before 5 years is up to keep their plan up to date and avoid having to provide evidence of a 5-year housing land supply.</p> <p>The 30 month timetable for new Local Plans does appear to be contingent on certain reforms being carried through into law.</p>	No comments on the proposals.

Proposals arising from the Levelling Up and Regeneration Bill, December 2022

Proposal	Detail	NPCO Commentary	Proposed TTC Response
<p>National Development Management Policies – scope and principles</p>	<p>These would become statutory considerations equal to local policy in decision making. For now, it is only the principles that are being consulted on.</p> <p>It is initially proposed that existing policies within the NPPF that influence decision making could be included. Others could be added “to reflect new national priorities” with other new policies introduced to close gaps where national policy is silent on matters.</p> <ul style="list-style-type: none"> • It is stated they will: only cover matters with a direct bearing on the determination of planning applications • are limited to key, nationally important issues commonly encountered across significant parts / the whole country • solely address planning issues. <p>Local plans / neighbourhood plans would not be able to repeat a NDMP</p>	<p>It is not asked if NDMPs are felt to be required. In return for having to accept these, development plan policies will be given more weight in decision making, but NDMPs will carry equal weight.</p> <p>The Government seem to be frustrated that their own guidance is not more than that. It is proposed that making these statutory considerations would assist by “making the basis for decisions clearer”.</p> <p>The NDMPs would be set out in a separate document to the NPPF, which would become focused on plan-making.</p> <p>The principle of a blanket policy affecting a “significant part” of the Country, nationally, is potentially harmful.</p> <p>We are asked, are the scope and principles correct? Are there other principles that should inform the scope of National Development Management Policies?</p>	<p>In the Town Council’s experience, the decision making policies within the NPPF are applied as though they were statutory. The existing NPPF policies are well understood, and this is felt to represent change that would bring uncertainty while rounds of legal challenges over weighting and primacy are undertaken.</p> <p>It is felt that applying nationally policies based on experiences within any part of the Country, even “significant parts”, is potentially harmful to the remainder.</p>
<p>National Development Management Policies – additional policies</p>	<p>Examples are included of additional policies that are felt to be required, which helps indicate the proposed purpose of NDMPs.</p> <p>These are a policy for carbon reduction in new developments; a policy to protect allotments; and a policy to encourage the development of housing in areas</p>	<p>It is argued within the consultation that as Local Plans frequently cover similar policies for which there is no national guidance, why not have a simplified, standardised one? The Government’s own examples indicate how what appears simple, is not.</p> <p>For some matters it may seem sensible to do so. Many local plans</p>	<p>There is felt to be little if any benefit to be gained from a national policy on “gaps” as they have been identified. Taking housing in town centres as an example, the principle of linking housing to areas with sustainable transport modes is ubiquitous. Local policies are written and passed at examination as they take account of very local circumstances, such as</p>

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	<p>that are accessible by sustainable transport modes.</p>	<p>have, however, already addressed carbon reduction, meaning a new national standard for carbon reduction may undermine established local policies. It could be too late to introduce such a policy, now.</p> <p>The encouragement of housing development in areas with good sustainable transport connections is practically ubiquitous and any variation at a local level would have been implemented to take account of an area's unique character.</p> <p>There is only so much a LPA or NDP group can do to formulate a policy that protects allotments. They are either protected, or have a criteria-based policy applied against them to allow their expansion, contraction or loss. The starting point is normally protection. There is, again, no need for this to be considered at the national level on the basis of the passage of time.</p>	<p>demographics and the balancing of other local policy concerns like the need for regeneration, employment and infrastructure.</p> <p>The ability to influence how development can benefit local communities is highly valued and the implementation of national policy on the basis of simplification misses the point of local and neighbourhood planning.</p>
Neighbourhood priorities statements	<p>Qualifying bodies will be able to produce a summary of the principal needs and prevailing views of the community in their neighbourhood area. LPAs will use these to guide them when preparing their Local Plans.</p> <p>They can cover the development / management / use of land, housing, the natural environment, economy, public spaces, infrastructure, facilities or services, or other features in their area. These can be modified and revoked. It has effect from the point it has been published by the LPA.</p>	<p>There is little known about these statements other than the draft clauses proposed within the Bill. There is concern among neighbourhood planning groups that these will be put in place to allow the Government to row back on the importance of neighbourhood plans.</p> <p>While there is no evidence of this, there may be a benefit to neighbourhood plan groups being able to produce a list of priorities to LPAs when their plan-making does not align.</p>	<p>Support, as long as this is used for groups who do not have the capacity to prepare a neighbourhood plan / where groups are out of alignment with their LPA in terms of plan-making.</p>

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	<p>These, and their modified versions will / may be subject to consultation.</p>		
<p>SPDs replaced by Supplementary Plans</p>	<p>Supplementary Planning Documents (such as SODC's Design Guide) will go. These will be replaced by Supplementary Plans, which will be given the same weight as a local plan or minerals and waste plan.</p> <p>SPDs will remain in place during a transition period, but will expire when LPAs current Local Plan expires.</p>	<p>Supplementary Plans will be able to contain policies. They will be able to specify development in terms of quantum, type and location. They will also be able to be used for site-specific purposes (perhaps Masterplanning), detail infrastructure or affordable housing, and design for an area or for specific sites.</p> <p>The above is the list given within the Bill. It is concerning that it appears to be a restricted list; in the past, SPDs could cover any matter the LPA thought appropriate to expand upon from their Local Plan.</p> <p>It is not clear why it is considered beneficial to cause important guidance documents to expire and risk not being replaced. Without further information on how this will fit into the future framework, it is suggested that the Town Council does not support this initiative.</p>	<p>It is not felt that any case has been given for the abandonment of SPDs and the introduction of a limited list of Supplementary Plans. It is not clear if or how guidance, once lost, could be reintroduced into the development plan. This is potentially harmful, and could be at the least cause LPAs unnecessary work. Without detail the Town Council cannot comment further.</p>
<p>Violence against women and girls</p>	<p>The NPPF states that "planning policies and decisions should aim to achieve healthy, inclusive and safe places..." and "...planning policies and decisions should promote public safety and take into account wider security and defence requirements".</p> <p>The Government is seeking views on whether they should bring forward proposals to update as part of next year's wider review the NPPF to place greater emphasis on</p>	<p>This may refer to how spaces are designed with passive surveillance achieved through overlooking, lighting schemes, etc.</p>	<p>Support.</p>

Proposal	Detail	NPCO Commentary	Proposed TTC Response
	<p>making sure that women, girls and other vulnerable groups feel safe in public spaces.</p>		
<p>Small scale nature interventions to improve biodiversity</p>	<p>We are asked to consider how national policy could affect small scale nature interventions. The example given is a ban on artificial turf surfaces, except on sports pitches.</p> <p>The Government points out this could be undertaken through the National Model Design Guide (which promotes bat boxes, bee bricks, etc.).</p>	<p>It may be worth proposing a blanket ban on landscaped public open space being subsumed into private gardens, except under certain circumstances.</p> <p>Members may wish to suggest interventions such as a presumption in favour of rain gardens in place of simple soakaways, etc.</p>	<p>Propose a ban on landscaped public open space from being granted permission to be incorporated into private gardens. Thame Town Council has recent experience of valuable and attractive landscaped open space (with native plant species) being granted permission to be enclosed behind private fences on new housing estates. The original planting was removed in all cases. This undermined the vision and masterplan, removed parts of wildlife corridors and reduced the quality of amenity for residents and visitors.</p>