

# Proposed reforms to the National Planning Policy Framework and other changes to the planning system

Organisation: Thame Town Council

Address: Thame Town Hall, High Street, Thame, OX9 3DP

Contact: Graeme Markland

Title: Neighbourhood Plan Continuity Officer

Tel: 01844 212833

e-mail: Graeme.Markland@thametowncouncil.gov.uk

Question 1 Do you agree that we should reverse the December 2023 changes made to paragraph 61?
Yes.
Question 2 Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?
No. While a standard method is arguably a useful backstop, some areas are experiencing significant swings in local population. Support should be given, therefore, for any method that fully and demonstrably identifies projected local housing need. Uplifts to take account of the local median-wage / house price ratio could still be universally applied to ensure supply is not constrained.
Question 3 Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?
Yes.
Question 4 Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?
No. The blanket presumption is not supported as design codes and master planning already lead to optimal densities in local character areas. Service, facility and open space “deserts” exist in both urban and rural areas and so LPAs should be trusted to identify exactly where sustainable development can be achieved at higher densities.
Question 5 Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?
Yes.
Question 6 Do you agree that the presumption in favour of sustainable development should be amended as proposed?
No. The planning system should not be made a means of punishing or suppressing community engagement in planning. The presumption could as an alternative require all planning decisions to be made by delegated decision and within the statutory time period, subject to development plan policies being complied with (or the Framework, where the Plan is more than 5 years old).

<p>Question 7 Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?</p>
<p>No. This is wasteful of scarce resources at the best of times and already slows down and complicates appeals. The proposed uplift in housing development will only add to this burden with expert witnesses already taking hours or days to trawl through every housing site in the hope of undermining the published supply. A simpler test would be if the LPAs is meeting its statutory targets / timetable for plan and decision making.</p>
<p>Question 8 Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?</p>
<p>No. This is a matter of concern for communities who see a development plan as vital in leading on the planning and delivery of essential community infrastructure. As an example, Thame's community understands that developer contributions cannot enable struggling GP surgeries to grow where the existing sites do not allow it. The re-provision of larger facilities will require new planning policy, engagement with stakeholders and identification of a site and developer. It is therefore vital that previous over-supply is accounted for when setting upcoming supply to ensure community infrastructure is not overwhelmed.</p>
<p>Question 9 Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?</p>
<p>No. It is very rare for a site granted permission to remain undeveloped over a plan period. It is relatively common, however, for multiple applications to be sought on individual sites. Thus, it can appear as if granted permissions are not coming forward, which has led to the dubious argument that a buffer is required to ensure "choice" of permissions / sites for the market. The "need" for this buffer has always frustrated and angered communities who understand that developments are approved by LPAs in good faith and that it is the landowner / developer who chooses when to build. Its presence or "need" also undermines trust in the housing needs system. If the standard method / acceptable alternative is working as expected, why would an automatic 5% buffer be needed?</p>
<p>Question 10 If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?</p>
<p>N/A</p>
<p>Question 12 Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?</p>
<p>Yes. Thame is on the border of two LPA areas and experiences at first-hand the difficulties in working across authority areas on strategic matters including direct experience on health, transport, minerals and waste, retail and employment matters, as well as housing. It should be made clear, however, that a test of effective cooperation should include a stress test for how strategic policies should work in border locations. This would avoid situations Thame has encountered where developments are both supported by yet contrary to similar policies within different Local Plans.</p>
<p>Question 15 Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?</p>
<p>No. In the public's opinion it is almost irrelevant whether either household projections or housing stocks are used as the basis for the standard method; both they and any multiplier</p>

used as part of the calculation are understood to be arbitrary. Residents view such methods as poor proxies for what they consider “proper” planning, i.e., that based on an understanding of local demographic, migration and workplace trends. The use of the standard methodology should only be supported as a backstop for areas without up-to-date plans to encourage LPAs to keep their development plans up to date.

Question 19 Do you have any additional comments on the proposed method for assessing housing needs?

Developers will always trickle housing supply to ensure housing values remain in line with the second-hand market. The proposed mechanisms for increasing the speed of delivery appear insufficient to address this. A significant increase in the numbers of permissions is expected to have little impact on the house price to earnings ratio. This is because most allocated or permitted sites are controlled by one, or at best 2 – 3 developers who can carefully align their products and build schedules to reduce risk of their products competing with other developments in the local area. This happens regardless of scale and location.

Question 20 Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?

This is an unnecessary change, any development proposal on brownfield land that complies with national and development plan policy is already considered acceptable in principle. The emphasis risks undue pressure being made to remove brownfield sites that might perform an ecological function or provide important visual relief in higher density areas.

Question 60 Do you agree with proposed changes to policy for upwards extensions?

Yes. The proposal provides clarity on what is expected of LPAs and returns an appropriate level of design control to them.

Question 67 Do you agree with the changes proposed to paragraph 100 of the existing NPPF?

Yes.

Question 68 Do you agree with the changes proposed to paragraph 99 of the existing NPPF?

Yes. The proposed duty on LPAs to plan for early years school provision, and post-16 facilities, is welcomed.