

Charlbury Town Council

Minutes of the PLANNING COMMITTEE MEETING

Held on Monday 23rd September 2024 at 8pm in the Green Room, Memorial Hall

Present: Peter Kenrick (in the chair), Ed Bradbury, Roy Scott, Arthur Sinclair, Tom Greenwood, Frances Mortimer, **Town Clerk:** Lisa Wilkinson, 9 members of public.

Peter Kenrick welcomed the members of public and explained that each person would have approximately three minutes to talk during public time.

1. **Apologies for Absence** were received from Gary Harrison and Liz Reason.
2. **Declarations of Interest** were received from Ed Bradbury for planning application 24/02083/HHD 9 Woodstock Rd.

3. Public time

Three members of public requested to speak on 23/03071/FUL Land south of Forest Road (amendments only):

- James Whitehead (Friends of West Oxfordshire Cotswolds) made the following points:

The High Court has ruled that WODC never had permission to grant consent as the original consent has expired. This means that this must be considered as a new application. This development will harm ancient woodland contrary to guidance from Natural England and is outside the existing built-up area. The TC represents the residents and therefore there maybe Town Council powers to request guidance on ancient woodland etc. from WODC and to make a few points if possible.

Peter Kenrick explained that this application was put in in December and only the newly applied for amendments were to be discussed at this meeting as a response has already been entered for the full planning application. The High Court ruling related to the previous application and is therefore not pertinent to discussions at this meeting. Any legal matters that may arise from this are for WODC to consider not the to the Town Council

- Rob Linell (Savill's) spoke:

Revised proposals were presented at the last meeting. 89% of homes are below market value. Revisions propose 26% biodiversity net gain.

1. High court ruling quashed the S73 application relating to the original planning application for the site.
2. The fact that WODC and the Town Council concluded the development is acceptable remains a material consideration
3. The housing mix of 35% four bed homes is because of the custom build units
4. WODC can no longer demonstrate a five-year land supply. Policy allows limited development within the AONB or more development where appropriate to local need.
5. These amendments make the development better than the accepted January scheme.

- Ian Cox (on behalf of group of residents) spoke:

The Young Dementia charity and a group of self-builders got together 10 years ago to find a suitable location for development. The Chair of Young Dementia still supports this development. There are 55 names on a list of people who would like to live on this development.

Three developments already built in Charlbury have not provided affordable housing. The Neighbourhood Plan references Rushybank and includes support for housing for young people.

5a. Planning applications received brought forward:

23/03071/FUL Land south of Forest Rd (amendments only) was brought forward:

Peter Kenrick clarified the previous Town Council response to this planning application in December 2023 and explained the duty to defend the Neighbourhood Plan.

It was clarified at the August planning meeting that only the amendments to this planning application were to be discussed. The planning officer at West Oxfordshire District Council (WODC) has also stated that this is what is required.

The amendments, as minuted at the August planning meeting:

- The District Council stated that the road layout was too square so it has been changed to provide a more curved, organic road
- The layout of house types has changed: bungalows have been clustered more closely providing better access to their own parking. The series of bungalows can be used for number of different care needs rather than just dementia care as originally proposed.
- Change of the mix of housing: 21 rather than 19 affordable housing which exceeds the guidelines, these comprise of six first homes and the rest affordable rented homes, (first homes must be capped at £250,000, open to first time buyers only and retained as such in perpetuity). Twelve properties will be custom build and there will be four full market properties.

Concern was raised about the change in the number of four bed homes not meeting Neighbourhood Plan policy CH6 which limits four-bedroom homes to a maximum of 20% rather than the proposed 35%. However, it was also pointed out that because some of this number is from the custom build quota and often will be built as three beds then it provides flexibility.

Discussion followed including lack of wide enough footpath to access the town and the 15-metre buffer to the ancient woodland. However as these were not included in the amendments, these were not progressed.

Voting on amendments as follows:

1. Accepted the increase in the number of four bed homes: accepted with proposed wording (see below*) to send to WODC to explain the Neighbourhood Plan policies: as the change is not compliant with policy CH6 but it does still meet the aims of affordable housing.
2. Accepted the curved road layout
3. Accepted that the bungalows can be used for number of different care needs rather than just dementia care

It was also **resolved** to request permitted development rights to be suspended by WODC so buildings (including sheds) or other nonorganic substances cannot be used in gardens within the 15-metre buffer and that the TC stands by its previous comments submitted in December 2023 along with these modifications.

4. To receive minutes of planning meeting dated 19th August 2024

These were received and signed as a true record.

5a. Planning applications received:

Ref no:	Address:	Proposal:	TC decision
23/03071/FUL (amendments only)	Land south of Forest Rd, Charlbury	Erection of thirty-seven dwellings including access road, landscaping and associated earthworks	No objection to amendments with comment*
24/02083/HHD	9 Woodstock Rd, Charlbury	Erection of replacement garage	No objection
24/02022/HHD	3 Sturt Road Charlbury	Proposed single storey rear link extension and conversion of outbuilding to habitable space	No objection
24/02006/S73	14 Hill Close Charlbury	Variation of condition 1 of Planning Permission 23/03112/HHD to retain existing concreted drive	Object to this S73 application on the grounds of Neighbourhood Plan policy NE8: <i>Development proposals should not result in increased surface water run-off unless appropriate mitigation measures are included with the details of the</i>

			<i>proposal.</i> An appropriate mitigation measure maybe the installation of a soakaway.
24/02171/FUL	Land north of Woodstock Road, Charlbury	Erection of a residential development comprising 26 dwellings (inc. 46% affordable housing), the provision of public open space and landscaping, demolition of existing garages and provision of new vehicular access via Woodstock Road and pedestrian access to Hughes Close and associated works	To be deferred until next planning meeting if an extension from the planning officer can be arranged. Alternatively, an extra planning meeting will be arranged.

***Comment:** Charlbury Town Council would like to make the following comments on the amendments to this planning application:

- It has no objection to the proposed curved more organic road rather than a square road layout.
- It has no objection to the bungalows being used for different care needs rather than for just young dementia care as OCC is responsible for determining what the need is.
- Increase in four-bed homes: it would like to point out that this is not compliant with Neighbourhood Plan policy CH6 (the proposed 35% of four bed homes substantially exceeds the 20% maximum specified in the Neighbourhood Plan) However, in this specific case, it has no objection to this increase in four-bed homes recognising that the proposed scheme still addresses the objectives of Aim 3 of the Neighbourhood Plan to meet the town’s local need for affordable housing (because 12 of these will be custom-build homes thus allowing flexibility for the buyer to build a three bed home if preferred).

On other matters, there is still huge concern over the 15-metre buffer to the ancient woodland as much of this buffer will be located in private gardens. The Town Council therefore requests that WODC suspends permitted development rights on the gardens within this buffer. This suspension to include any buildings (including sheds) but also nonorganic substances (such as hard standing and astroturf).

The Town Council would also like to ensure that the other comments submitted in December 2023 are still taken into consideration.

5b. Planning Outstanding:

Ref no:	Address:	Proposal:	TC Decision
23/03136/FUL	Land And Woodland South Of Watermead Farm Spelsbury Road Charlbury	Change of Use from agricultural to 'glamping' campsite comprising 18 nos. camping units (8 nos. bell tents, 7 nos. shepherds huts and 3 nos. A-frame pods), ancillary facilities (including cafeteria and site reception, 2 nos. toilet and shower blocks, maintenance and storage barn), access and parking, and associated infrastructure	Object and no further comment
24/01833/FUL	The Bell, Church St, Charlbury	Erection of an external store, erection of a replacement bar and erection of a pizza bar (retrospective)	No objection plus comment
24/00432/FUL	Land East Of Fawler Road Charlbury	Upgrading of existing access into agricultural land and provision of trackway to serve proposed new general storage building.	Object
23/03071/FUL	Land south of Forest Rd, Charlbury	Erection of thirty-seven dwellings including access road, landscaping and associated earthworks	Support subject to conditions

5c. Planning Decisions:

Ref no:	Address:	Proposal:	Decision
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23/02894/LBC & 23/02893/FUL	Lees Rest, Woodstock Rd, Charlbury	Revised plans: Demolition of existing bungalow and erection of replacement dwelling to form an extension to the existing farmhouse and associated landscaping. Refurbishment of existing farmhouse. Repair, conversion and extension of existing agricultural buildings to provide ancillary accommodation.	TC - No further comment WODC - Approved
24/01996/HHD	62 The Slade, Charlbury	Conversion and extension of former garage to form garden room.	TC -No objection plus comment Application withdrawn
24/01895/HHD	7 Chartwell Drive, Charlbury	Replacement of wooden shed with steel shed	TC - No objection WODC - Approved

5. Consultation on new National Planning Policy Framework

The response below was agreed and will be submitted.

Meeting closed: 21.45

Response to Planning Reform Consultation – September 2024

Chapter 3 – Planning for the homes we need

Do you agree that we should reverse the December 2023 changes made to paragraph 61?

Yes

To aid clarity and conformity, and to expedite plan & decision making. However, local circumstances remain important and care is needed to ensure that these are still given careful consideration

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?

Yes

As per answer to Q1

Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?

Yes

Paragraph 62 is unnecessarily prescriptive. Removal should encourage cross boundary co-operation to resolve issues and this should be beneficial

Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?

Yes

To encourage the use of localised design codes. Where appropriate, local design codes should be encouraged within Neighbourhood Plans drawing upon local knowledge and priorities

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?

No

Design codes are important for ALL areas but we do agree that they should reflect and support localised considerations. Where appropriate they should reflect local knowledge and priorities included in Neighbourhood Plans

Do you agree that the presumption in favour of sustainable development should be amended as proposed?

Yes

Crucially, the presumption must not be an excuse for otherwise inappropriate and/or poor quality development. So clarification within the NPPF that other key policies (in the NPPF, local and/or neighbourhood plans) remain relevant, is vitally important

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?

No

We completely understand the aim of this proposal but we are concerned that this requirement will place an additional excessive burden on LPAs and provide more opportunities for aggressive developers to undermine carefully prepared spatial strategies.

Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?

Yes

Agree the priority is to consider current and future need

Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?

Yes

If Yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?

Yes (5%)

Do you agree with the removal of policy on Annual Position Statements?

No opinion

Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

Yes

Crucial requirement especially given the proposal to strengthen the use of the Standard Method of calculating housing need.

Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

Yes

Necessary to accommodate longer term strategic planning

Do you have any other suggestions relating to the proposals in this chapter?

We acknowledge and support the aims and aspirations set out in this chapter but have some concerns that the proposed measures represent increased centralisation in terms of policy, plan making and delivery. This may be necessary to achieve the desired goals but it is important not to lose sight of importance of local factors as well as the wealth of knowledge and understanding of local matters that exists within communities, especially those where neighbourhood plans have been prepared and made with the support of local volunteers to reflect the views, aspirations and priorities of the communities themselves. Strengthened recognition of the importance of local knowledge and aspirations would be welcome.

Chapter 4 – A new Standard Method for assessing housing needs

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?

No

Whilst housing stock may be a more stable metric, it totally fails to reflect demographic changes or, at best, severely lags behind them. It also fails to recognise mismatches between need and provision in terms of size and type of homes, or factors such as average occupancy. Demographic changes can occur rapidly in response to technology, lifestyle patterns and many other factors and it is vital to properly take account of these in planning for the future

Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3-year period for which data is available to adjust the standard method's baseline, is appropriate?

Yes

A well established and accepted approach. A 3-year rolling average should help to avoid and smooth short-term blips.

Do you agree that affordability is given an appropriate weighting within the proposed standard method?

No

We have no concerns about the weighting per se, taking the very simplified view of housing need based on housing stock. However, factors such as mismatches of size and type of home between need and stock are not taken into account and may seriously skew the results. For example, in areas such as ours (Charlbury, Oxfordshire within the Cotswold National Landscape), where major developments are seldom possible,

developers have often chosen to build large expensive houses rather than the smaller ones needed that have a chance of being within the reach of those on median incomes on whom the vitality of the community depends

Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?

Yes

No specific suggestions but care will be needed in differentiating short and long-term rentals, particularly in areas where short-term lets are increasing rapidly.

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

The proposed method does not appear to take account of factors such as size and type of home, average occupancy, and, for rental properties, availability for long-term rentals.

Chapter 5 – Brownfield, grey belt and the Green Belt

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

No

The proposed change is too sweeping. It gives the impression of mandating approval in principle to any such development without requiring adherence to any other policies whatsoever. We suggest the wording should be changed adding "subject to compliance with [other relevant policies]"

Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?

No comment as we are not located in the Green Belt

Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?

No comment

Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

No comment as we are not located in the Green Belt

Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

No comment as we are not located in the Green Belt

Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

Yes and it should be contained within PPG

Guidance enabling and informing the inclusion of local criteria within local and/or neighbourhood plans.

Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?

Yes

We are concerned that the requirement to meet only one of the conditions in paragraph 10b may inappropriately qualify land as grey belt where that land plays a significant role in other ways.

Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

Yes

Green Belt land can play a major role in furthering the Lawton principles (more, bigger, better and more joined spaces for nature) that lie at the heart of Local Nature Recovery Strategies. Achievement of the national "30:30" target to ensure that 30% of UK land and water area is good for wildlife by 2030 is ambitious but vitally important and Green Belt land can play an important role in achieving this. For example, the creation, expansion and improvement of blue/green corridors, creation and enhancement of important habitats such as wetlands, calcareous and floodplain meadows, woodland, hedgerows and wood pasture. Green Belt land along rivers can be sites for reconnecting rivers with their flood plains to reduce flooding and improve water quality.

Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

No

The proposals certainly provide very useful prioritisation but changes in use in one place will always have impacts elsewhere and care is therefore always needed to consider land use and environmental impact at a wider landscape scale and avoid unintended consequences on other locations. So while the proposals will be helpful, individual cases must always be judged in a wider context. For example see our answer to Q27

Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?

Yes

See answer to Q29

Do you agree with our approach to allowing development on Green Belt land through decision making?

If not, what changes would you recommend?

No comment as we are not located in the Green Belt

Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?

No comment as we are not located in the Green Belt

Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?

No comment as we are not located in the Green Belt

Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?

No comment as we are not located in the Green Belt

Do you agree with our proposed approach to the affordable housing tenure mix?

No comment as we are not located in the Green Belt

Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?

No comment as we are not located in the Green Belt

Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

No comment as we are not located in the Green Belt

Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?

No comment as we are not located in the Green Belt

How and at what level should Government set benchmark land values?

No comment as we are not located in the Green Belt

To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?

No comment as we are not located in the Green Belt

It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?

No comment as we are not located in the Green Belt

Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?

No comment as we are not located in the Green Belt

Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers' sites and types of development already considered 'not inappropriate' in the Green Belt?

No comment as we are not located in the Green Belt

Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?

No comment as we are not located in the Green Belt

Do you have any comments on the proposed wording for the NPPF (Annex 4)?

No comment as we are not located in the Green Belt

Do you have any comments on the proposed approach set out in paragraphs 31 and 32?

No comment as we are not located in the Green Belt

Do you have any other suggestions relating to the proposals in this chapter?

No

No comment as we are not located in the Green Belt

Chapter 6 – Delivering affordable, well-designed homes and places

Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

Yes

Those requiring Social Rent form a significant part of the demographic and it makes no sense to exclude them from housing needs assessments. This sector has the potential to offer real solutions to affordability for many people and it should be considered as part of the wider picture and not as an exception.

Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

Yes

The figure is arbitrary. LPAs and neighbourhood plan groups should be free to set their own local targets in this regard as they see fit

Do you agree with removing the minimum 25% First Homes requirement?

Yes

First Homes are crucially important in addressing the housing shortage but the figure is arbitrary and different figures may be appropriate in different locations. LPAs and neighbourhood plan groups should be free to set their own local targets in this regard as they see fit

Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?

Yes

- a. Retaining the First Home and affordability benefits in perpetuity (for subsequent residents) is vital.
- b. Exception sites offer a real opportunity to deliver First Homes and should be supported but clear guidance is necessary within the NPPF to ensure that these developments comply with other important policies (national and local) relating to matters such as sustainability, energy efficiency, protection of the environment, design and supporting local communities.
- c. First Home Exception sites are currently excluded from National Parks and National Landscapes (AONBs) but such sites could be appropriate where the development provides exceptional benefit to local communities whilst protecting the sensitive and important location.

Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Yes

This can help to foster community cohesion

What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?

Support LPA initiatives in this area including the provision of new council housing (e.g. for essential workers). Such schemes should still include a mix of tenures and types (as Q51) to avoid perceptions of ghettoisation and promote community cohesion. These schemes must also include positive elements to generate a sense of community including public green spaces, recreation facilities, community centres etc.

What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?

See answer to Q52. The inclusion of a mix of tenures and types and the promotion of community are key

components to avoid unintended consequences. It may be appropriate to consider a maximum percentage of affordable homes in some cases.

What measures should we consider to better support and increase rural affordable housing?

- a. Restrict Right to Buy. In rural locations RTB can rapidly erode affordable housing stocks with no realistic opportunity to build replacements.
- b. Ensure that affordability benefits are maintained for subsequent residents in perpetuity so that affordable homes for sale do not become unaffordable market housing.
- c. If RTB is to be permitted in some cases then affordability benefits as above should also be assured for future residents in perpetuity whenever the property is sold.
- d. Encourage communities to bring forward schemes through neighbourhood plans including community-led projects and nomination of rural exception sites. Local community involvement in this way should help to ensure that schemes genuinely meet local need, benefit the community and protect the local environment

Do you agree with the changes proposed to paragraph 63 of the existing NPPF?

Yes

Do you agree with these changes? (Community-led developments)

Yes

See response (d) to Q54

Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?

Yes

"Affordable homes" are not genuinely affordable to many, including those on median incomes. Defining affordable rent in relation to median local income instead of market rent would help to address this. Ideally this approach should also apply to First Homes.

Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?

Yes

Landowner "hope values" are too high and the limited number of homes possible is normally below the threshold for requiring on-site affordable housing or meaningful developer contributions. Such sites often therefore appear as windfall proposing small numbers of expensive homes with little or no local benefit. A similar approach to that outlined in para 32 of this consultation for benchmark land values in the green belt may be appropriate in other rural areas to address the "hope value" issue. Also support for local involvement through community-led schemes and neighbourhood plans (see answer (d) to Q54) could be very effective in unlocking small sites by utilising local knowledge and expertise

Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?

No

Unnecessary change

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

No comment

Do you have any other suggestions relating to the proposals in this chapter?

Yes

In some areas short term (holiday) rentals are becoming an issue making many modestly sized properties unavailable to local people who need them. A difficult problem but some action to regulate this sector may be necessary and appropriate

Chapter 7 – Building infrastructure to grow the economy

Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

Yes

Are there other sectors you think need particular support via these changes? What are they and why?

Yes

a. Local energy generation. Local schemes can avoid or reduce the need for expensive and unpopular extensions to the national grid infrastructure whilst providing additional resilience. Community-based schemes can also more readily achieve local "buy in".

b. Local food production and regenerative agriculture. Essential for the future of food security as well as reductions in food miles. The essential move to regenerative agriculture will take time and perseverance and a clear message of support at this stage will aid the transition.

Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?

No

These important developments will have major impacts on the locations in which they are located and the proposals need to be properly integrated into planning for the area and region. So they should be incorporated into local plans in as timely a manner as possible.

If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?

No comment

Do you have any other suggestions relating to the proposals in this chapter?

Yes

The proposals in this chapter are welcome in sending a clear message of commitment to the industries and infrastructures of the future focused on resilience and the achievement of net zero targets. This message should provide the essential confidence to business to encourage investment in the UK. The focus should be extended as circumstances allow to other critical areas including regenerative agriculture. Also, support needs to be extended down to local (county, district and community) levels where small but effective and popular projects can often be delivered quickly utilising local knowledge, skills and enthusiasm. Local enterprise of this kind can also help to add resilience to the overall economy.

Chapter 8 – Delivering community needs

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

Yes

Long overdue! Essential infrastructure needs, particularly incremental ones such as water supply, sewage and public transport, have been neglected for far too long and the "chickens have finally come home to roost"!

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

Yes

Particular emphasis needed on genuine meaningful apprenticeships

Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

Yes

Strongly support the vision-led approach.

One issue regarding paragraph 115. Given the government's (and our own) commitment to promoting safe active travel, I suggest adding "for any users (including pedestrians and cyclists)" after "highway safety".

How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

The NPPF already provides useful guidance in these areas in chapter 8 but this could be strengthened to provide further certainty as to what will be required, by LPAs (including as part of plan making), communities, developers and others. Active support for safe walking and cycling, sport, recreation and green space accessible to all are essentials. Support for education and youth initiatives will also play an important role. Most of these initiatives can best be devised and delivered at community level so promoting local authority active support for communities is key. Regarding development, simple targeted policies within local or neighbourhood plans can be very useful and effective so explicit support for this approach in the NPPF would be welcome. As examples, our Charlbury Neighbourhood Plan includes specific policies on: the provision of children's play facilities on-site or within easy walking distance; provision of safe and attractive walking and cycling routes to school, town centre etc.; provision of easy walking access for all; and local green spaces.

Do you have any other suggestions relating to the proposals in this chapter?

Yes

As mentioned in other earlier answers, explicit support and encouragement for communities through

neighbourhood plans and other initiatives is important to provide confidence for communities to bring forward innovative schemes exploiting local knowledge, expertise and support

Chapter 9 – Supporting green energy and the environment

Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

Yes

This sends an important positive message of support for renewable energy initiatives to give confidence to businesses for investment. Note however, that these schemes will have significant impacts on often sensitive landscapes and every effort must be taken to achieve local "buy-in". So local involvement and consultation are essential from the earliest stage. Communities must be heard, schemes must be incorporated into local plans and community benefits must be assured.

Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

Yes

BUT!

Again an important message of support for renewable energy initiatives to give confidence to businesses for investment.

BUT we STRONGLY OBJECT to your proposed deletion of paragraph 161 which called for LPAs to support community-led initiatives for renewable and low-carbon energy. This deletion is not mentioned in the consultation - why is it proposed?? These schemes are already playing a major role in the switch to renewables and they have the potential to do much more in the future. As community-led schemes they are usually well supported and do not attract the opposition of larger schemes seen as "imposed" from outside. We have such a scheme (Southill Community Energy) on the outskirts of Charlbury which is an exemplar and is well supported by our local LPA (West Oxfordshire DC).

Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

Yes

There should certainly be additional protections for such important and sensitive habitats. Compensation schemes may also be appropriate but these should not override the protections

Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

Yes

We have no specific view on the threshold levels but if this change provides more certainty to support development, we support it. As mentioned in our answer to Q72, these schemes will have major impacts on often sensitive landscapes so every effort must be taken to achieve local "buy-in" through early engagement and consultation.

Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

Yes

Comments as Q75

If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?

Not applicable

In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

Require all significant new housing developments to be designed and delivered to net zero standards. To support this, any viability assessments should be based on lifetime costs, not on build costs. New homes should also incorporate surface water capture and grey water recycling and usage systems.

What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

No comment

Are any changes needed to policy for managing flood risk to improve its effectiveness?

Yes

Requirements for new developments to incorporate rainwater capture and grey water systems.

Strengthening of SUDS requirements
Increased support for flood plain reconnection on agricultural and green space/green belt land

Do you have any other comments on actions that can be taken through planning to address climate change?

Yes

Reinstate NPPF paragraph 161 to support community-led energy projects (see our answer to Q73)
Increase expectations of developer support for public transport especially bus services
Provide support and certainty to householders to encourage investment in rooftop solar energy, retrofit energy efficiency improvements, battery systems and smart energy controls.
Support local initiatives with regard to all of the above to aid rapid delivery.

Do you agree with removal of this text from the footnote?
No

Food security remains a high priority.

Are there other ways in which we can ensure that development supports and does not compromise food production?

Yes

Strong requirements and enforcement of SUDS and other measures to ensure that the development does not exacerbate flood or pollution risks on farm land.

Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?

Yes

More robust monitoring and regulation with real "teeth". Not only the water companies but also polluters and others who fail to implement agreed drainage systems or don't observe regulatory requirements in terms of rain and foul water discharge.

Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?

Yes

Introduce a requirement for surface water capture and grey water recycling systems within all significant developments. These need to be backed up by enforcement.

Do you have any other suggestions relating to the proposals in this chapter?
Yes

Increase focus on LOCAL provision including through local nature recovery networks, community-led energy generation, support and advice to householders and businesses on rooftop energy generation, use of battery technology and smart metering and retrofit.

Chapter 10 – Changes to local plan intervention criteria

Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?

No comment

Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?

No comment

Chapter 11 – Changes to planning application fees and cost recovery for local authorities related to Nationally Significant Infrastructure Projects

Do you agree with the proposal to increase householder application fees to meet cost recovery?
Yes

But beware unintended consequences of rogue developments without planning consent. Increased enforcement resource may be required as a result. We would also favour an increased fee for retrospective applications which are, alas, becoming more common.

If you answered No to question 89, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.
Not applicable

If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?
Don't know

But we suggest an increased fee for retrospective applications

Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.
No comment

Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.
No comment

Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?
No comment

What would be your preferred model for localisation of planning fees?
Don't Know

Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?
No comment

What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?
Enforcement - charges for contravention

