

Overview and Scrutiny Committee comments on the on the National Planning Policy Framework: Proposed reforms and other changes to the planning system.

Overview and Scrutiny Committee Comment	Head of Planning response
1. Need to make representations about Cotswold Railway in the context of heritage and conservation.	Heritage policies – default would in future be the NPPF rather than the Local Plan. Local Plan policies on heritage will need to be more locally nuanced. The proposed approach towards high density development near railway stations are considered too permissive, and we are making representations about sensitivities.
2. Need to make a strong case on housing affordability.	Concern shared, covered in Annex with particular reference to social rented housing.
3. Additional chapters on energy, water and flood risk welcome. No need to put weight on consulting with statutory consultees beyond statutory deadlines is a concern.	Concern shared, covered in Annex.
4. Renewable energy – large solar farms, weaker controls and lack of strategic oversight.	Concern that a more permissive approach could override new Local Plan policies, covered in Annex.
5. Mineral development and waste – lots of worry about mineral development and associated traffic on inadequate road networks.	Concerns noted but this is primarily a matter for the Mineral Planning Authority – Oxfordshire County Council.
6. Concerned about loss of local voice. Need ability locally to object to infrastructure failures. Do we need to comment about this?	Principles around making representations won't change. Reduced supporting information is a concern and this is covered in the draft response.
7. Effect of proposals on the Council's statutory duties?	Some things will be elevated to higher (Thames Valley) level of plan making. Doesn't take away the need to produce a local plan but will make it more locally specific.
8. What does the Ministerial Statement being torn up mean for Salt Cross?	Statement will be rescinded. Other than for water and accessibility councils won't be able to set local standards e.g. for energy efficiency. Developers will push back if the Council is out

	of alignment with the NPPF. Agreed that the response to Question 194a on this issue should be clarified with reference to the previous Court of Appeal decision on the Ministerial Statement.
9. Covering letter bullet pointing main concerns?	We will try to do this on an Oxfordshire-wide basis.
10. The Government's standard method for calculating housing growth needs to be looked at due to the scale of building being huge. Can we say that?	This consultation is not specifically on that theme although the suggested draft response to Question 48a does express concern about the further upward pressure on housing targets. This can be further strengthened and augmented.
11. Could the buffer be 20% rather than 10%?	The 20% buffer mentioned relates to the issue of 5 year housing land supply as opposed to overall 10% buffer to the housing requirement which has been suggested through consultation on the emerging local plan to date.
12. Need to ensure that affordable housing will be delivered e.g. rural exception sites, with reference to registered providers.	Good point and can further emphasise this point in the suggested draft response.
13. Viability standards and profit margin of 20% - too high?	The consultation refers to a 20% profit on market housing but a blended average of 17.5% including affordable housing. This is a fairly standard industry assumption. Hard pushed to make the case that that's unreasonable.
14. Active travel - can cycle infrastructure be included in the NPPF, specifically with reference to LTNI/20 for cycle path infrastructure?	Will include suggestion that this is included as a standard requirement of development.
15. Should CIL and S106 be streamlined?	There is no suggestion of combining, replacing or streamlining S106/CIL in this current consultation.
16. Do you believe that this will be read by government, or will they just tell us what's happening?	It is important for the Council to respond to the consultation, not least because of the potential concerns around the delivery of net zero carbon homes. A large number of organisations are submitting strong objections and volume and consistency of responses may influence outcomes.

17. How do we encourage infrastructure first?	Sub-regional plan (Spatial Development Strategy) will have to address infrastructure issues at a strategic, sub-regional level including where funding will come from. Local Plan will cover more local needs, phasing and how it will be delivered for specific sites/locations. Infrastructure first is very challenging, need to have it phased as early as possible or forward-funded. Viability and cashflow issues don't support infrastructure-first. The Council is working hard on ensuring adequate sewage treatment capacity e.g. Grampian conditions.
18. Social housing 50% on large sites and half of that social rent? Why don't we build what we need?	Social rent is the only truly affordable tenure and this is reflected in the consultation response which suggests that where on-site affordable housing is provided, 50% of provision should take the form of social rented housing.
19. CNL having the highest status of protection? Add something about CNL in the context of railways.	There is no direct weakening of the protection currently afforded to the CNL but it is agreed that the sensitivity of the CNL could be more strongly highlighted in the context of the proposed approach towards new development near railway stations.
20. Need to list more than just social housing from developer contributions. Can we strengthen and list categories e.g. transport, education, health, nature recovery.	Agreed that it would be sensible for Policy PM12 to refer to other forms of infrastructure provision. The draft response can be amended to suggest this with specific examples given e.g. nature recovery, waste water etc.
21. Produce a covering letter to be submitted with the Council's response to the consultation and share the letter with public and parishes to show the work the Council is doing on their behalf.	The Council's communications team are working on a media release so that all stakeholders including Town and Parish Councils are aware of the position being taken by the District Council on these key matters.