

Didcot Town Council

Minutes of the

Planning and Development Committee Wednesday 28th October 2020 Online at Zoom.us



PRESENT:

Councillors: A Dearlove (Chair)
D Macdonald
P Siggers
M Walsh
J Durman

Officers: G Langton (Planning & Environment Officer)
J Wheeler (Town Clerk)

117. To receive apologies.

Apologies were received from Cllr P Giesberg, no member substituted for him.

118. To receive declarations of interest.

No member declared an interest in any item on the agenda.

119. To approve the draft minutes of the meeting held online via Zoom on 16th September 2020.

Councillor Dearlove proposed, Cllr Durman seconded, and it was **RESOLVED** to approve the draft minutes as a true and accurate record on the meeting. All members agreed.

120. Questions on the minutes as to the progress of any item.

No questions were raised.

121. To consider the Committee's budget for FY 2021-22.

Councillor Dearlove proposed, Councillor Macdonald seconded, and it was **RESOLVED** to recommend to the Finance and General Purposes Committee the budget items as copied overleaf. All members agreed.

Heading	Amount	For
Traffic surveys	£1,000	The Traffic Advisory Group has received a budget for conducting traffic surveys in the past, currently coded as 1272.
Printing & publicity of planning applications	£1,500	SODC no longer print planning applications. Following the change to the District Council's processes in response to the Covid-19 restrictions, paper copies of planning applications have not been produced since March 2020. In a letter sent to all towns and parishes in April 2020, Adrian Duffield stated that the DC intended <i>"to continue with this practice for the long-term as it is more environmentally friendly, supports our council's aims of becoming carbon neutral, and it has helped to reduce costs"</i> . The Town Council may therefore have to print copies should members of the public visit the Civic Hall to view the application in hard copy. Members of the public still ask to see hard copies at the Town Council offices. The Town Council is only able to print to a maximum of A3 size. The Committee considers that larger formats would be required if and when face to face meetings return and/or to provide to members of the public to review at the Council Offices. Broader planning activities such as the Gateway redevelopment or extensions of Didcot to the extent of its parish boundaries could be considered to require the Council to engage directly with residents, remotely or face to face (when circumstances allow). Publicity would be required to ensure the fullest possible engagement.
Public Consultations	£3,000	The Traffic Advisory Group has agreed to progress plans for the consultation of local residents with regard to civil parking enforcement. Other consultation exercises may be forthcoming for large planning consultations and other development activity, such as detail of section 106 and section 38 agreements. Venues may need to be rented
Professional fees	£5,000	The Town Council may need specialist help when considering applications, for example Hydrologists can be engaged to provide specialist advice regarding flooding or waterlogging of land. The Town Council could benefit financially from a well-managed engagement with developers and the principle authorities. It is becoming more common practice for developers / District Councils to offer the management and maintenance of public open space, play areas, allotments (for example) to smaller authorities, along with some funding. To ensure the best outcome, even with the standard formula applied by the District Councils of £X per square metre, the instruction of a solicitor is advised to ensure the agreement drafted is to the best benefit of the smaller authority. A local Parish Council secured a S106 contribution in this way of in excess of £240,000 with an outlay of less than £1,000. The possible ALDI site just west of the Town in Harwell Parish could, for example, be seen as having an effect on the facilities of the own but infrastructure money would not be forthcoming without professional involvement, it would all be presented to Harwell Parish, though the store would be understood to be in Didcot.
Signage	£2,500	The Council has no road and limited other signage at present. The Royal British Legion passed the management of the Remembrance Day parades in future years to the Council and it and will need to purchase or hire the required signage. The Council may wish to erect signs to assist with traffic calming for other works and events on its land also need similarly supporting.
Total	£13,000	

122. To receive an update from the Government White Paper Consultation, “Planning for the Future” working group.

The Committee heard that the Group had drafted a full response to the consultation, which would be submitted on the day of this meeting and copied to the Council’s [website](#). A copy is presented at the end of these minutes for reference.

123. To consider responding to the SODC Local Plan Main Modifications Consultation.

Councillor Dearlove proposed, Councillor Macdonald seconded, and it was **RESOLVED** to submit the response copied below. All members agreed.

Didcot Town Council’s planning committee supports many, but not all the proposed main modifications. The Plan’s emphasis for the town of Didcot focuses on Garden Town implementation, deliverance of the Housing Infrastructure Fund (HIF) transport infrastructure and Didcot’s role as the gateway to the Science Vale.

The Council notes that this plan does not allocate any new housing developments within or around Didcot that were not already proposed under previous versions or had existing permissions.

The frequent strengthening of the document wording around tackling and controlling climate change is welcomed by the Council. It is felt that this is important and must form a key building block of the plan. The Council also welcomes the new wording for the deliverance of Didcot’s green infrastructure, including sustainable access to Didcot Parkway.

The Council agrees that becoming a Garden Town should reduce the reliance on motor vehicles for journeys within the town, however, the new wording should be strengthened with greater detail as to how this would be achieved and include explicit reference to the Department for Transport’s guidance on Cycle infrastructure design ([LTN 1/20](#)).

The Council would like to express its concern with the proposed changes to the wording for EP1 at MM61:

From: “In order to protect public health from the impacts of poor air quality: development must **be compliant with** the measures laid out in the Council’s Developer Guidance Document and the associated Air Quality Action Plan, as well as the national air quality guidance and any local transport plans”

To: “In order to protect public health from the impacts of poor air quality: development must **have regard to** the measures laid out in the Council’s Developer Guidance Document and the associated Air Quality Action Plan, as well as the national air quality guidance and any local transport plans”

This is a watering down of the requirement. Air quality must be considered an issue of high importance. Any wording should be clear precise and ensure future development is bound to deliver positive action.

124. PLANNING APPLICATIONS

Proposals for Comment

a)	Applicati on	P20/S3434/F UL	31 Norreys Road Didcot OX11 0AT
	Proposal	Variation of condition 2 (approved drawings - design changes) on application ref. P17/S4005/FUL Construct a new two bedroom house at the side of 31 Norreys Road Didcot, with a single storey extension at the rear of the existing house. Two new parking spaces and highway cross-over from Brunel Road. Re-arrangement of parking and new highway cross-over from Norreys Road at the front of the property.	
	Response date	22 nd October 2020 - Extended to 2 nd November 2020	
	Agreed response	Councillor Macdonald proposed, Councillor Siggers seconded, and it was RESOLVED to submit a response of No Objections to the proposal. One member abstained.	
b)	Applicati on	P20/S2487/HH	30 Kynaston Road DIDCOT Oxon OX11 8HD
	Proposal	Proposed additions to the existing back extensions and associated alterations.	
	Response date	23 rd October 2020 - Extended to 2 nd November 2020	
	Agreed response	Councillor Dearlove proposed, Councillor Macdonald seconded, and it was RESOLVED to submit a response of No Objections to the proposal. One member abstained.	
c)	Applicati on	P20/S3250/HH	38 North Road Didcot Oxon OX11 7EQ
	Proposal	Two storey side extension, single storey lean to kitchen extension and front porch (amendment to previously approved Planning Application P20/S0147/HH)	
	Response date	23 rd October 2020 - Extended to 2 nd November 2020	
	Agreed response	Councillor Walsh proposed, Councillor Siggers seconded, and it was RESOLVED to submit a response of No Objections to the proposal. All members agreed.	
d)	Applicati on	P20/S3491/HH	33 Park Rd, Didcot. OX11 8QL

	Proposal	Two storey rear extension	
	Response date	27 th October 2020 - Extended to 2 nd November 2020	
	Agreed response	Councillor Dearlove proposed, Councillor Siggers seconded, and it was RESOLVED to submit a response of No Objections to the proposal. All members agreed.	
e)	Application	P20/S3486/HH	30 Usk Way, Didcot. OX11 7SQ
	Amended Proposal	Demolition of existing garage and erection of a single-storey extension to the side and rear of the property.	
	Response date	27 th October 2020 - Extended to 2 nd November 2020	
	Agreed response	Councillor Macdonald proposed, Councillor Walsh seconded, and it was RESOLVED to submit a response of No Objections to the proposal. All members agreed.	
f)	Application	P20/S0983/FUL	48 to 50a Hagbourne Road Didcot OX11 8DS
	Amended Proposal	Amendment No. 1 - dated 11th September 2020 Residential development comprising 8 x one bedroom flats and 3 x two bedroom houses with associated access, parking and landscaping (as amended by plans received 11 September 2020)	
	Response date	26 th October 2020	
	Agreed response	Councillor Walsh proposed, Councillor Siggers seconded, and it was RESOLVED to submit a response of No Objections to the proposal, reiterating the same comments as when the Committee considered the proposal at its 22 nd April 2020. All members agreed.	
g)	Application	P20/S1883/RM	Land south of A4130 Didcot
	Amended Proposal	Amendment No. 1 - dated 6th October 2020 Proposal : Reserved Matters application for alternative scheme for 8 dwellings (follows P18/S0719/RM reserved matters approval for layout, scale, appearance and landscaping for 166 dwellings granted by outline permission P16/S3609/O 1 September 2017). (as amended by drawings accompanying letter from Agent dated 6 October 2020).	
	Response date	26 th October 2020	
	Agreed response	Councillor Dearlove proposed, Councillor Walsh seconded, and it was RESOLVED to submit a response of No Objections to the proposal. All members agreed.	
h)	Application	P20/S3529/FUL	123 Broadway Didcot OX11 8AL
	Proposal	Demolition of the existing building and the erection of a replacement building comprising three 1- bedroom units.	

	Response date	3 rd November 2020	
	Agreed response	Councillor Macdonald proposed, Councillor Siggers seconded, and it was RESOLVED to submit a response of No Objections to the proposal. One member abstained.	
i)	Application	P20/S3621/HH	23 Freeman Road, Didcot. OX11 7DD
	Proposal	Single storey side extension	
	Response date	3 rd November 2020	
	Agreed response	Councillor Macdonald proposed, Councillor Dearlove seconded, and it was RESOLVED to submit a response of No Objections to the proposal. All members agreed.	
j)	Application	P20/S3619/HH	8 Doe Lea Didcot OX11 7YQ
	Proposal	Two storey and single storey rear extensions.	
	Response date	5 th November 2020	
	Agreed response	Councillor Dearlove proposed, Councillor Walsh seconded, and it was RESOLVED to submit a response of No Objections to the proposal. All members agreed.	
k)	Application	OCC Ref CM/12.6.189	Brasenose/Slade Road & Larch Drive (Didcot)
	Proposal	Proposed 20mph Speed Limits & Traffic Calming	
	Response date	30 th October 2020	
	Agreed response	Councillor Siggers proposed, Councillor Walsh seconded, and it was RESOLVED to submit a response supporting the proposals. All members agreed.	
l)	Application	P20/S3573/HH	13 Barleyfields Didcot OX11 0BH
	Proposal	To drop /amend 4 kerb sections. To widen the vehicular hardstanding to enable 2 vehicles (currently 1) to park in front of the property, but off road.	
	Response date	10 th November 2020	
	Agreed response	Councillor Macdonald proposed, Councillor Dearlove seconded, and it was RESOLVED to submit a response of No Objections to the proposal. All members agreed.	

125. APPLICATIONS FOR CERTIFICATES OF LAWFUL DEVELOPMENT AND INFORMATION ONLY.

The Committee noted the below listed lawful development proposals.

A)	Application	P20/S3696/PDH	27 Kynaston Road DIDCOT Oxon OX11 8HE
	Proposal	Single storey rear extension: Depth 3.6m Height 3.47m Height to eaves 2.25m	
e)	Application	P20/S2763/FUL	Former Natwest Bank 124 Broadway Didcot OX11 8AD
	Amended Proposal	Amendment No. 3 - dated 15th October 2020 Proposal : Erection of a part single part two-storey roof infill extension with rear roof dormer to create additional residential accommodation.(as amplified by email from agent dated 24 September 2020 in relation to Town Council's objections and drwgn0 1039 06 which shows the storage and collection point for bins received on 30 September 2020 and amended by plan ref 1039 04 B which shows 4 cycle parking spaces received 15 October 2020).	
	Agreed response at previous meeting:	<p>The Council believed that no material changes had been made to the proposal and agreed to re-submit its previous objections:</p> <p><i>The Committee considered that the two extra storeys would put greater pressure on the limited amenity space that the developments affords. Flat 2, for example would only have windows at the bottom of a 3-storey high light well which is far from acceptable.</i></p> <p><i>There is no space to park cars at the property or in the immediate local area. Occupiers may well have cars and this needs to be considered. There is virtually no outdoor amenity space. The Committee recognises that there are two parks within a 20-minute walk but would point out that many uses an outdoor amenity space at one's dwelling is put to cannot be done in a park – you can't hang your washing out in a park, for example. The plans show space for 3 bicycles. Six flats 1-bedroom flats with no parking could be expected to attract more than three bicycles.</i></p> <p><i>The access to the flats was narrow on the ground floor already and is narrower still as the storeys rise. There is no clear demonstration of how people with limited mobility could be expected to access the upper floors.</i></p> <p><i>There was no space for bin storage, with the originally proposed 3 flats, the solution of keeping the bins ion the street could have been suitable but for 6 flats it is not. Secure bin storage with</i></p>	

		<i>access to the street should be a requirement to ensure the development does not have a negative impact on public health.</i>
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126. PLANNING APPEALS

The Committee noted the below listed appeals. The Committee noted that the appeal lodged by the applicant against the non-determination of the proposals contained within planning application P19/S2502/O had not yet been assigned a hearing date. Councillor Dearlove proposed, Councillor Macdonald seconded, and it was **RESOLVED** to send a member of this Committee to attend the hearing and be heard by the Inspector if offered. All members agreed.

A)	Application	P20/S1049/HH	58 Queensway Didcot OX11 8LU
	Proposal	Description of development: Detached workshop to rear and first floor extension over existing ground floor. (As amended by drawing no. QNS.P01D, received on 21 April 2020, and QNS.P01E received on 14 May 2020, to enlarge workshop to integrate stairs and revisions to workshop roof).	
	Planning Outcome	Permission was granted for the garage workshop, but not for an extension to the property, it was not set back from the front. DTC did not object.	
	Representations by	16 th November 2020	
B)	Application	P19/S2502/O	Land East of Sandringham Road Didcot
	Proposal	Outline planning application with all matters reserved (other than access into the site) for the proposed development of up to 325 residential dwellings, open space, vehicular and pedestrian accesses, landscaping, drainage measures and all other associated works including the demolition of 11 - 55 Mansfield Gardens. Appeal reference number: APP/Q3115/W/20/3255846	
	Planning Outcome	No decision issued.	
	Appeal hearing	No date yet given by the Inspectorate.	

127. APPLICATIONS APPROVED

The Committee noted the below listed applications granted permission.

Didcot Town Council's recommendation	Planning Application Number	Proposal and Address
No objections.	P20/S3029/HH	Application proposal, including any amendments : Conversion of the rear section of the garage of 11 St Hilda's Close into a home office. (as amended by plan RFP-1424-WW-B1-00-A-0000-B which amends the site plan excluding highway land) 11 St Hildas Close Didcot OX11 9UU
No objections.	P20/S2687/FUL	Demolition of two wooden utility sheds. Erection of a prefabricated metal insulated cabin (6m x 2m x 2.4m high) on a new concrete base, to be laid at the rear of an existing brick-built hall at Didcot Baptist Church, within and adjacent to the present church southern boundary fence. The addition of a further window in the said hall, facing the proposed cabin. Didcot Baptist Church 43 Wantage Road Didcot OX11 0BS
No objections	P20/S3106/HH	Proposed demolition of the existing conservatory, ground floor rear extension. 28 Saxons Way Didcot OX11 9RA
<p>Objection:</p> <p>The Council is concerned that the proposal would significantly disrupt the building line.</p> <p>This would affect the visibility splay for traffic exiting the adjacent Abbott Road, thus having a detrimental effect of road safety.</p> <p>The proposal is for a two-bedroom property. The District Council</p>	P20/S0412/FUL	<p>Appeal Ref: APP/Q3115/W/20/3252165</p> <p>Land adjacent to 105 Queensway, Didcot OX11 8SN</p> <ul style="list-style-type: none"> • The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission. • The appeal is made by Mr Alan Salmon against the decision of South Oxfordshire District Council. • The application Ref P20/S0412/FUL, dated 14 January 2020, was refused by notice dated 27 April 2020. • The development proposed is the erection of one additional dwelling. <p>GRANTED ON APPEAL.</p>

<p>requires two 3.5mx5m parking spaces for such a property. It is not clear from the documents presented that the property has more than one space, and this is only 2.5m wide. The proposal does not meet the requirements. Further, the entrance to this parking space is close to the junction of Abbott Road and Queensway, which would affect traffic safety in the immediate area. The proposal is unneighbourly with regard to the property at 71 Abbott Road, Didcot. The occupiers of this property will suffer some loss of amenity from the widened hard standing to accommodate both property's parking areas and from the scale and bulk of the proposed property and its effect on 71 Abbott Road's access to light.</p>		
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128. APPLICATIONS REFUSED

The Committee noted the below listed applications refused permission.

Didcot Town Council's recommendation	Planning Application Number	Proposal and Address
<p>Objection.</p> <p>The impact on the character of the area with the development of land close to an AONB. The B4016 forms a boundary between the town of Didcot to the west and the area of outstanding natural beauty, the North Wessex Downs, to the east. The proposed development would start the spread of the town further towards this AONB, significantly affecting the character and cultural value of that landscape.</p> <p>The proposal is not consistent with the Local Plan. The Council noted that the Planning Officer, in her response to the pre-application decision, advised the proposer that "this site is not currently allocated for development in the South Oxfordshire Core Strategy (SOCS). It is also not a site allocation in the Emerging South Oxfordshire Local Plan 2034 (ESOLP), which is in the process of being examined" and would be adopted later in 2020. She further noted that the land in question was not an allocated site.</p> <p>Traffic generation and highway safety were considered to be significant concerns. The single entrance to the proposed development would be on a fast road leading north from Didcot to villages and beyond to the large town of Abingdon. The land in question would be a long walk to the Town centre and the rail station, necessitating most residents driving. This would dramatically increase</p>	<p>P20/S1577/O</p>	<p>Outline application for up to 176 dwellings including public open space comprising a country park, a LEAP and additional Green Infrastructure provision with all matters reserved other than access. (As per amended information received 19 May 2020 and 23 July 2020, and clarified by additional information received 17 June 2020, 13 July 2020, 27 August 2020 and 18 September 2020)</p> <p>Land at Lady Grove Didcot OX11 9BP</p>

<p>traffic on this road and the junction raised questions of highway safety. The Council noted that in the conclusion of her preapplication decision, the Officer considered that should the proposal be submitted for approval it was “likely that a highway objection will be raised”.</p> <p>The Council was very concerned about the affect the proposal would have on the trees on the site. It was noted that SODC had recently placed preservation orders on a number of them and the Council, while acknowledging that building could be planned to be sympathetic to the trees at the start, the trees would continue to grow. The Council was therefore gravely concerned that any development would affect these trees in the future, no matter what measures were taken at the planning stage.</p> <p>The Council was concerned over the viability of any proposal. The application was for outline permission, thus giving little certainty over the style and scale of the development. The developer had themselves noted that other sites across the town had proved difficult to deliver due for a variety of reasons. The Council, knowing that the developer planned to sell the site on, was concerned that the development indicated would not be deliverable in a timely manner.</p>		
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129. APPLICATIONS WITHDRAWN

The Committee noted there were no withdrawn applications presented.

Didcot Town Council’s recommendation	Planning Application Number	Proposal and Address
None		

130. APPLICATIONS REFERRED

The Committee noted there were no referred applications presented.

Didcot Town Council's recommendation	Planning Application Number	Address	South Oxfordshire District Council Officer's recommendation
None			

The meeting ended at 20:35

Signed

Dated

Didcot Town Council

Ministry of Communities, Housing and Local Government Consultation White Paper: Planning for the Future.



Response from Didcot Town Council. 28th October 2020.

1. *What three words do you associate most with the planning system in England?*

Response:

No answer provided.

2. *Do you get involved with planning decisions in your local area? [Yes / No]*

Yes

(a). *If no, why not? [Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify]*

Response:

Not applicable.

3. *Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future? [Social media / Online news / Newspaper / By post / Other – please specify]*

Response:

A more accessible digital system would be welcomed. However, there are members of the community that cannot access the internet for a variety of reasons and they should not be excluded from the consultation process.

Analogue systems must support any improved digital one.

Any revised system should allow the public and other respondents to a development proposal to be able to view stats and details about a prospective developer, including past performance against agreed metrics such as build-out rate, complaints received, infrastructure completion time scales and community

responsiveness. While this may not be possible because of other laws on competition or GDPR or that larger developers' access to (eg) legal teams could skew the results, that does not mean that the possibility cannot be fully explored to improve the responsiveness of developers to local issues.

The appeal process is currently one-sided, with only those not granted planning / inclusion on a local plan able to appeal. This would benefit from review to enable other specified groups to initiate the process, such as Local or Smaller authorities.

**4. What are your top three priorities for planning in your local area?
[Building homes for young people / building homes for the homeless /
Protection of green spaces / The environment, biodiversity and action on
climate change / Increasing the affordability of housing / The design of new
homes and places / Supporting the high street / Supporting the local
economy / More or better local infrastructure / Protection of existing
heritage buildings or areas / Other – please specify]**

Response:

- Increased affordability of market and rented housing.
- Reduction of carbon footprint of both the build process and finished home to net zero. This would include the completion of any new home with solar panels (PV Cells and for hot water), grey-water recycling. This should be supported by the utilisation of ground and air source heating and other technologies as they emerge.

Improvements to community infrastructure within walking / cycling distance; facilities, highway/walking/cycle and community infrastructure should be in place at the commencement of any development so as not to overwhelm the current population and/or facilities.

5. Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. The simplistic definitions (GROWTH, REGENERATION & PROTECTION) cause concern, with greater concern being caused by the combining of GROWTH and REGENERATION. There is no indication of land use other than for housing or urban-style commercial development. Land should also be zoned for agriculture, forestry and industry, for example.

The proposals imply that the planning system as currently operated is the major impediment to house building. The Council does not agree with that premise and notes the Letwin Independent review of build out: [final report](#) (published 29

October 2018 jointly by the Ministry of Housing, Communities & Local Government and HM Treasury) also does not support this view.

The simplification appeared to be biased towards the developer rather than a true simplification. Would an identification of GROWTH mean that all land in the area was open for development? How large would the areas be? Could they be larger than now (equated to parish boundaries for example) or be limited to zones as they are in Local Plans currently? It was hoped the definitions would be detailed rather than for large areas.

Concern was noted that if an area was defined as GROWTH, then it could create a situation where prospective developers could view a locality as a catalogue of places to develop. Outline permission being automatically granted for any development that anyone cares to put forward a plan for in such areas is a cause for serious concern. This, coupled with the obvious outcome that officers' recommendations will determine the remainder of the detail would lead to all existing protections within the planning regulations being removed.

An amended planning system could identify all areas as PROTECTED, then apply tests to see if any proposed development was sustainable.

Quicker processes could be of some benefit to all parties in the planning process, with some schemes taking many years to complete under the current system.

RENEWAL is confused. The direct link with an aspiration for 'gentle densification' is a continuation of the 'back-land development' proposals previously in place. The net effect is to reduce green and amenity space as property and land owners seek to make use of the policy and build in gardens and other small parcels of vital local green space. The net effect cannot lead to "net gains for biodiversity as a condition of most new development" [p56, proposal 14]. The use of the word 'most' is noted with deep concern. A net gain for biodiversity should never be an aspiration, it should be mandatory.

6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. Concern was noted that the having national policies only would remove local nuance and reduce local resident engagement.

7. (a) Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. The current system’s ‘fail safe’ of having any plans tested against approved criteria is important.

The relevant environmental information is more likely to be understood at a local level. National views cannot be detailed or focused enough to make any such test sufficient.

(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?

Response:

Why is the government asking consultees to propose a change? It is for the government to propose changes for consultees to consider.

The duty to cooperate across all borders (parish/district/county) is both strategically important and vital for community cohesion. We would want to keep the duty to cooperate. If not, the border areas may not be planned as effectively as possible, with, for example, one Local Authority proposing development up to a border with a large settlement and thus burdening that large settlement but providing it with none of the facilities or ongoing council tax returns that would enable it to incorporate the new housing effectively.

8. (a) Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. There are well publicised concerns over land banking, however, many bank land but have delays in the building process caused by a lack of available skilled labour, for example.

Of more concern the method for arriving at housing requirements was not as clear as it could be so amendments would benefit the process it is not clear what the best way forward would be and it would be for the Ministry to provide for scrutiny. The question was asking for a response to various things but without the detail of what those would be.

The problem is currently compounded by certain areas being required to absorb a neighbouring area's unmet need.

Currently, the ONS uses an algorithm to establish future housing need, the outcome of which is then amended by a relationship to the relative cost of housing to local income levels. That means areas that do not need significant housing numbers are expected to receive more than they need. What would bring house prices down and thus increase affordability would be to increase the local stocks of social-rented housing.

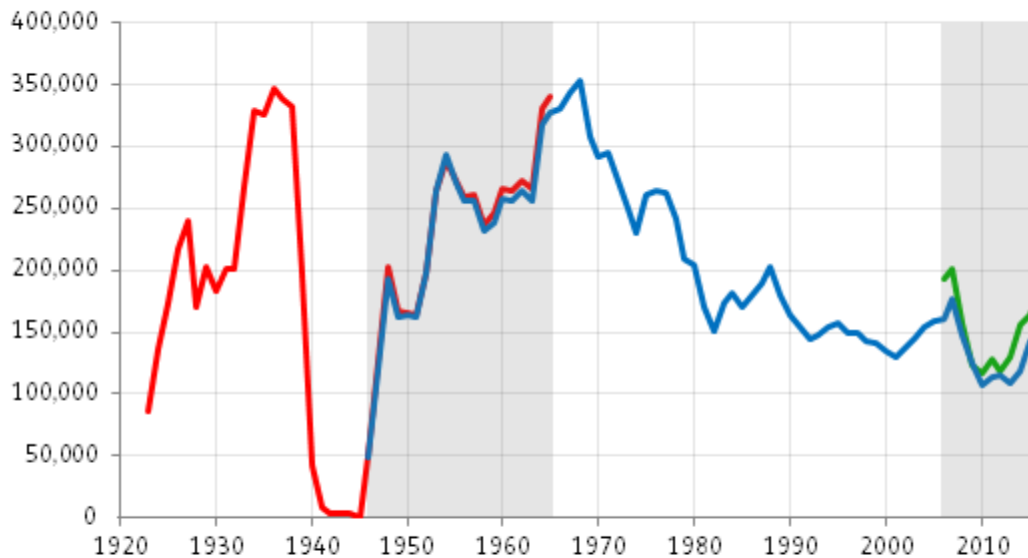
(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. This presupposes that the housing market is a true free market. It demonstrably is not. Even through recent recessionary periods house prices grew. The Letwin Independent review of build out: [final report](#), in its Executive Summary concludes "that the homogeneity of the types and tenures of the homes on offer on these sites, and the limits on the rate at which the market will absorb such homogenous products, are the fundamental drivers of the slow rate of build out." The main factor in a slow build-out rate is therefore the absorption rate of the completed houses. It can be seen from the chart below that house build-out rates are most commonly boosted by the government or its agencies building homes for social rent. Local Authorities should therefore be encouraged to acquire land at a reasonable cost to allow affordable homes to be provided.

House building since the 1920s

Permanent dwellings completed in England*, 1923-2017**



* discontinuity of data 1946-65. Pre-1965 (red) includes Wales. Post-1946 data in blue. Post-2006 data (green) relates to the new builds outlined in the net additional dwellings release, this measure is more comprehensive than previous counts.

** data in blue is for calendar years. Data in red and green is for financial years.

Source: DCLG live table on house building 244 (post-46 blue) and 120 (post-2006 green) and data provided by Construction Products Association (pre-65 red)

Further, The construction sector is one of the biggest contributors to greenhouse gas emissions. Reducing and eliminating CO2 emission is a global goal. The planning system should set clear, fixed standards to reach net zero carbon in both construction and in operational energy.

9. (a). Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. There is concern that certain aspects of land use are not included, for example green fields, forestry, rivers, lakes and industry. The proposals do not seem to zone business areas as a current local plan would, just housing and local/town centre retail. Local Plans and supporting policies would need to be detailed enough to indicate how a piece of land may be developed, so identifying it for houses rather than for blocks of apartments, for example. National Policy is too blunt a tool to take account of local nuance, local authorities would need to

retain responsibility for determining the needs of the area. The proposal as outlined is not detailed enough to form a definite answer.

(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. The detail in the White Paper does not provide for adequate protection of 'protected spaces' or allow identification of sites that should **never** be built on. 'Renewal' would seem to be a licence to draw out urban sprawl.

There should be further categories, such as one to fully embargo land from any type of development.

(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. The scheme referred to was brought in to enable the development of critical infrastructure such as railways, ports, airports, roads and industry. Extending it to housing would not take account of local nuance and character. New towns take a generation or more to become cohesive communities.

10. Do you agree with our proposals to make decision-making faster and more certain? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. The use of the word 'certain' in this context causes the Council concern, however the general principle that timeframes should be adhered to by all parties in the process is welcome.

The proposal seems to assume that the delays were always on the part of the planning / principle authority. This is not the case, with the vast majority of planning proposals being approved within the 13 week deadline and very few progressing to planning authority Planning Committees for determination, especially in South Oxfordshire where the Council is located. The process for determination has been speeded up further lately as SODC officers have been delegated further authority to grant approval for an application where statutory respondents had recommended refusal.

11. Do you agree with our proposals for accessible, web-based Local Plans? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. The system should allow the public and other respondents to a Local Plan to be able to view stats and details about any prospective developer, including past performance against agreed metrics such as build-out rate, complaints, infrastructure build and community responsiveness. It was understood that this may not be possible because of other laws on competition or GDPR or that larger developers' access to (eg) legal teams could skew the results.

It was noted that the appeal process was one-sided, with only those not granted planning / inclusion on a local plan able to appeal.

Further, web-based only Plans would not be inclusive. To be fully accessible web-based local plans must run alongside the more traditional methods. Approx. 20% of the adult population does not have sufficient access to suitable IT.

12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. A shorter timescale was a welcome, ideally to be kept within an election cycle so the drafting and consultation of a plan would not cross administrations with conflicting priorities.

The planned removal of the automatic right to be heard is undemocratic and this right should be retained.

Whilst there are some things wrong with the current planning system, this White Paper appears to be an attempting to dismantle the whole system on the strength of that, disposing of the positive and good aspects at the same time.

The whole purpose of this White Paper purports to be to "unlock growth". Its premise is that the more houses built, the better, ad infinitum. Evidence is sorely needed about how many more homes are really needed rather than the contested approaches used currently. There is too little emphasis on retaining countryside and green spaces both inside and outside of urban and sub-urban areas, nor a serious attempt to address the climate emergency.

13. (a) Do you agree that Neighbourhood Plans should be retained in the reformed planning system? [Yes / No / Not sure. Please provide supporting statement.]

Response:

Yes. And the weighting attributed to them should be increased due to the intricate and intimate knowledge of the neighbourhood, which a Local Authority cannot be expected to have. The Neighbourhood Plan should be the location for the allocation of CIL/S106 (or equivalent) funds, design codes, highways and non-vehicular traffic infrastructure requirements and meeting similar immediate needs.

(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?

Response:

The granularity should be increased, to enable local people to affect what may happen on small or contiguous parcels of land in their communities.

14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. Currently build-out is entirely in the hands of the developer. Local authorities could affect this by commissioning social-rent housing.

Infrastructure should be front-loaded, not the final stage. All infrastructure should be in place before the occupation of the first property on a development. For larger developments this could be the case for agreed sub-areas.

Build-out rates do need to be improved but there is no evidence that this would be a panacea for affordability. The document suggests the sub-division of a development would improve build-out and absorption rates, "different builders which allow more phases to come forward together" [p43, Proposal 10]. Even if different types of property were built, this would surely have little impact unless the market types were substantially different, for open market and for social rent, for example.

15. What do you think about the design of new development that has happened recently in your area? [Not sure or indifferent / Beautiful and/or well-designed / Ugly and/or poorly-designed / There hasn't been any / Other – please specify]

Response:

- Poorly designed and realised.
- Infrastructure and local connectivity are installed too late.

- Internal roads are not fit for purpose, they need to accommodate cars and leave space for traffic to pass, with pavements/shared surfaces wide enough to allow for safe walking and cycling.
- Community facilities (such as GPs, Dentists and neighbourhood centres) should be installed in central locations and at an early stage of any development.
- Developments should be designed to foster a sense of community and inclusion.

Developers should be accountable when facilities have not been installed as agreed.

16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area? [Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other – please specify]

Response:

Unfortunately, sustainability is not at the heart of the proposals outlined in the white paper consultation. All the examples listed (Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees) are important. It is extremely concerning to note that there is not even an aspiration of zero-carbon building practices or homes that can be zero-carbon run, development must be sustainable in every aspect of the word.

This must be legislated for at a national and local level as currently and as far as can be ascertained from the proposals in the consultation, the requirement for energy efficiency and building is far too light. It is understood that all residential developments achieve zero-carbon by 2025 and achieve net zero carbon by 2050. It is not clear whether those standards are to apply to construction and use, either or both.

17. Do you agree with our proposals for improving the production and use of design guides and codes? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. However design codes must be backed by legislation that promotes adherence not aspiration. Exceeding any stipulated code should be the aspiration.

The consultation is short of detail here (as is the case through much of the document), with no indication of where national policy ends and local codes would be applied.

18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making? [Yes / No / Not sure. Please provide supporting statement.]

Response:

Yes. It may be a surprise to many that such a body does not currently exist, as the consultation document strongly implies. Any such body established must be largely independent from government, at "arm's length" as suggested. It would ideally be in the public sphere but a not-for-profit agency may be appropriate in extremis.

19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England? [Yes / No / Not sure. Please provide supporting statement.]

Response:

Yes. It is notable that the passage this question relates to includes a desire to "embed high environmental standards" [p50, Proposal 13]. This ambition has been left out of the text of the question. To refocus the department's minds, the Council suggests that embedding environmental standards be given equal weight to the other stated aims of delivering "beautiful and well-designed homes and places" [p50, Proposal 13].

20. Do you agree with our proposals for implementing a fast-track for beauty? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. The proposals are far too vague. Beauty is to be aspired to, achieved even but other matters must also be considered. The habitation standards of the houses for example, amenity provision (places to store bins, car parking etc).

Nothing should be fast-tracked. Well designed and high standard housing would be granted consent anyway, so why fast-track substandard housing.

Planning should be integrated, not merely eye-washing for attractiveness. Good, sustainable development would also provide community facilities.

21. When new development happens in your area, what is your priority for what comes with it? [More affordable housing / More or better infrastructure (such as transport, schools, health provision) / Design of new buildings / More shops and/or employment space / Green space/ Don't know / Other – please specify]

Response:

Communities should not have to choose between these. All the listed factors are of importance! The priority surely is to stop permitting poor development.

22. (a) Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. It takes away the element of negotiation. It is also more accessible for Local and Smaller authorities than current approaches. However, a threshold based on value does not provide a clear approach, there is no indication of how the *de minimis* would be applied or its likely figure, which surely would need to be set locally? Would this be for new constructions only, it is not clear? Section 106 currently provides affordable homes, which should be retained in any levy figure and provided by the builder rather than expecting a local authority to build all such properties.

(b) Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally? [Nationally at a single rate / Nationally at an area-specific rate / Locally]

Response:

More infrastructure should be provided to areas that lack facilities and infrastructure and have therefore not benefited from such provision in the past. A nationally-set area specific rate could be designed to ensure this outcome.

(c) Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities? [Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]

Response:

The levy should provide more value to the local community than is currently the case, which should include local facilities, affordable housing etc.

(d) Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. There are too many variables that are unclear from the paper. There would need to be a guarantee of the value of eventual receipts and a zero interest should be applied.

23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights? [Yes / No / Not sure. Please provide supporting statement.]

Response:

Yes. All development should make some contribution to local infrastructure and facilities.

24. (a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. More affordable housing must be provided.

(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. It should only be a right to purchase by Local Authorities at discounted rates, the right to purchase any of the properties and to be given first refusal on all properties. This would lead to all homes being built to the same habitation standards.

(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. Don't provide in-kind delivery.

(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality? [Yes / No / Not sure. Please provide supporting statement.]

Response:

No. Don't provide in-kind delivery.

25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement.]

Response:

Yes. Local authorities are aware of local need and nuance. There have been difficulties in the past experienced by smaller authorities in accessing S106 funds as a result of the detailed wording of the agreements.

(a) If yes, should an affordable housing 'ring-fence' be developed? [Yes / No / Not sure. Please provide supporting statement.]

Response:

Yes. This would ensure the money is spent where it is needed. Any ring-fencing structure may need detailed design and the use of 'affordable' is pernicious. All housing should be affordable, it should not be a term synonymous with social-housing or used as a mechanism to keep housing prices high.

26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

Response:

There should be minimum habitation standards that exceed the requirements of the Equality Act 2010 and subsequent revisions.