



Town planning and development



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RE: GORING NEIGHBOURHOOD PLAN – COMMENTS ON THE NEW NATIONAL PLANNING POLICY FRAMEWORK (24 JULY 2018)

Dear Mr. Townley,

We write in behalf of the WRRG following our representations made on behalf of them into the draft Goring Neighbourhood Plan (GNP) and your subsequent letter seeking comments on the newly published NPPF. Our comments on this are directed solely on the basis of how they impact upon the matters we have been instructed to review, these being, the designation and proposed land allocation of site GNP6, and in particular, the inclusion of proposed access onto Wallingford Road as well as the inclusion of development on land known as 'The triangle'.

Our comments are as follows.

General review

In general we note that the emphasis of the 2018 NPPF remains the same and that '*The presumption in favour of sustainable development*' is retained in the NPPF, providing the focus for the consideration of new development. Aspects have changed that could influence consideration of the GNP include the methodology for assessing housing need and maintaining an adequate supply of housing (Chapter 5), the inclusion of a wholly new chapter on design (Chapter 12) and clarification around the method to be adopted in assessing the impacts of development upon AONBs (Chapter 15).

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Chapter 5 - Delivering a sufficient supply of homes

We note that policies and guidance for the assessment of housing need and supply are set to change, but that these will be subject to a transitional arrangement such that neighbourhood plans already at the stage of regulation 15 at 24th July 2018 (i.e. at an advanced stage and submitted) will not be made subject to these changes.

Chapter 12 - Achieving well-designed spaces

Chapter 12 is a wholly new chapter and whilst elements of this were include in the previous 2012 NPPF, in our view the creation of this new chapter in adds weight to the consideration of design in the planning process.

At para 124 it states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve, and that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. It further adds that being clear about design expectations, and how these will be tested, is essential for achieving this.

Of relevance to the Examiner's considerations here, it adds that plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. It ads that Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.

Furthermore, to provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high quality standard of design. It cautions that their level of detail and degree of prescription should be tailored to the circumstances in each place, and should allow a suitable degree of variety where this would be justified.

It further adds that planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

It adds that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

As far as this affects the consideration of the Goring Neighbourhood Plan, we consider that chapter 12 strengthens the arguments made on behalf of the WRRG with respect to the way in which the GNP has determined that the access to site GNP6 (and land at 'The Triangle') has been put forward and justified. Since we have already strongly suggested that this process has been flawed in not attaching enough weight to the impact of the proposed allocation on the AONB, and has not considered all alternatives to avoid or mitigate this risk, it cannot be said the at this aspect of the plan would be 'sympathetic to local character and history, including the surrounding built environment and landscape setting'.

Furthermore, on the matter of proposed 'Site Specific Requirements' (SSRs), proposed in the GNP (intended to ensure that the adverse impacts of development in site GNP6 is a minimised), chapter 12 also strengthens our view that the impacts of providing a wholly new estate road in this location onto Wallingford Road ought to be known in full before a decision is made to allocate the site in the first place. In this respect, Chapter 12 advocates the use of visual tools design codes within plans or supplementary planning documents to provide maximum clarity about design expectations at an early stage, 'which can provide a framework for creating distinctive places, with a consistent and high quality standard of design'. This is missing in the GNP, resulting in an inadequate understanding of the actual impacts that will result, and inappropriate mitigation in the form of SSRs.

Chapter 15 - Conserving and enhancing the natural environment

Chapter 15 largely reconfirms the previous provisions in stating that planning policies and decisions should contribute to and enhance the natural and local environment by, inter alia,

protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);. It reconfirms that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.

At para 172, the 2018 NPPF effectively mimics the former advice or paras 115 and 116 of the 2012 NPPF. It states that the scale and extent of development within these designated areas should be limited, and that planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications (remains the same) and should include an assessment of:

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Thus, the newly adopted NPPF does not alter the view that the assessment methodology adopted in the allocation of site GNP6, as expressed in our earlier statements and representations at the Examination Hearing, remains flawed.

We also note that despite rumours to the contrary, the definition of 'Major Development' in AONBs has not been defined, and for the purposes of paragraphs 172 and 173, it remains the case that whether a proposal is 'major development' remains a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

Summary

In our view the 2018 NPPF has brought in additional layers to the consideration of planning matters and in particular the method by which housing allocations will be calculated. These will not affect the current consideration of the GNP, though elsewhere, the NPPF does add more weight to the consideration of design in both plan-making and development control decisions. In our view this increases the importance of being able to fully understand the design and landscape impacts of site GNP6 before it is allocated. Chapter 12 further supports our argument that the details of proposed access points onto Wallingford Road remain unknown and by dint of this, so do its landscape effects, and whilst the GNP sets out a set of broad SSRs to minimise harm, this could be better understood with the provision of a fully detailed plan of proposed works.

Finally, we note that as far as the consideration of development within AONBs is concerned, their importance and method for assessing development has not altered.

We trust that these comments will be passed to the Independent Examiner for review in his consideration of the issues.

Yours sincerely,

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