Dear Mrs Wilson

SOUTH OXFORDSHIRE DISTRICT COUNCIL - CORE STRATEGY – IMPLICATIONS OF THE NPPF

Savills is instructed by Regeneration Holdings Limited to submit the following representations in response to your e-mail dated 3 April 2012 and your subsequent letter of 23 April 2012. These requested our views on the implications of the National Planning Policy Framework (NPPF) on the emerging South Oxfordshire Core Strategy.

The comments set out in this letter refer specifically to development in and around Thame. We have not considered the implications of the NPPF on the Core Strategy as a whole.

Housing Delivery

Section 6 of the NPPF refers to delivering a wide choice of high quality homes. Paragraph 47 of the NPPF sets out five criteria that local planning authorities should utilise to boost the supply of housing in their area. These include:

a. Using their evidence base to ensure that their local plans meet the full objectively assessed needs for market and affordable housing in the housing market area, including identifying key sites which are critical to delivery of housing strategy over a plan period;

b. To identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% to ensure choice and competition in the market for land;

c. Identify a supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15.

Failure to Identify Key Sites

The current approach to delivering housing at Thame set out in the February 2012 struck through version of the Submission Core Strategy, namely to delegate allocations to the Thame Neighbourhood Plan, is inconsistent with the three criteria from the NPPF listed above.

The Core Strategy is, in relation to Thame, reliant on the Neighbourhood Plan to allocate 775 homes on land selected through that process. The NPPF clearly states at Paragraph 47 that Plans should identify:

“key sites which are critical to delivery of housing strategy over a plan period.”
The Core Strategy fails to meet this criterion and, as such, the strategy fails to accord with the requirements of the NPPF. The Core Strategy should be amended to provide a strategic allocation of land at north-west Thame.

5 Year Supply of Housing Land

The second criterion, as listed above, refers to the need to identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing. The word “deliverable” is specifically defined in the NPPF as:

"to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years and, in particular, that development of the site is viable". [our emphasis]

The current approach to the development at Thame does not accord with the above criteria in that no deliverable site had been identified in the Core Strategy. By allocating all of the housing numbers to a subsequent neighbourhood plan sites can not be available now and do not offer a suitable location for development now. Such an approach fails to accord with the NPPF approach.

There is also no certainty or a realistic prospect that housing will be delivered on the sites within 5 years. The only way to resolve this inconsistency between the NPPF and the Core Strategy is to re-instate an allocation of land at north west of Thame as set out under the submission draft version of Policy CSTHA2. The level of housing that is necessary to be allocated should reflect the requirement to meet a 5 year supply of housing land which the Council has previously determined to be around 400 dwellings (as set out at the Inspector’s comments in document reference ID37). In that way, the Thame section of the Core Strategy will be consistent with the framework set out in the NPPF. In the same way the approach will not undermine the Neighbourhood Plan process, but ensure deliverability and consistency with the NPPF.

Supply of Housing Over the Longer Term

The last criterion from the NPPF identified above is for local planning authorities to identify a supply of specific, developable sites or broad locations for growth in years 6-10 and where possible for years 11-15 of the plan period.

As set out above, there are significant concerns regarding the ability of the Neighbourhood Plan to identify and deliver housing within the first five year period as the process is unknown and relies on a public referendum. However, the Thame Neighbourhood Plan is better placed to identify a supply of specific, developable sites for the longer term ie years 6-10 and beyond. In the event that the Neighbourhood Plan fails there would then be adequate opportunity for the local planning authority to step in and recover the situation under implementation policy CSC1 - Delivery and Contingency.

The Neighbourhood Plan in so far as it can deliver a longer term view of development is consistent with the framework of the NPPF.

Presumption in Favour of Sustainable Development

We do not consider that the current version of the Core Strategy adequately reflects the presumption in favour of sustainable development set out in the NPPF.

It is recognised that the Core Strategy is based on the principles of sustainability. However the NPPF sets out an amended definition for sustainable development, based on a three stranded approach including environmental, economic and social criteria. Each one being mutually dependant on each other. This revised approach needs to be incorporated within the Core Strategy to make it consistent.

Given the above, we consider that it would be appropriate for the model policy as set out on the Planning Portal and reproduced in your letter of 23 April 2012 to be included within the Core Strategy.
The model policy replicates the criteria set out at Paragraph 14 of the NPPF and is therefore entirely consistent with the underlying aims and objectives of the NPPF.

We trust that the above is clear, but if you require any further information or clarification please do not hesitate to contact me at the above address.

Yours sincerely

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