

**Housing and Planning Scrutiny Select Committee – NPPF Consultation – Summary of Member Comments and Responses**

Chapters 3 and 4 - Planning for the homes we need; and the new Standard Method of assessing housing need:

- Expressed concern re increased housing targets =+5% uplift
- Expressed concern re implications to Local Plan timetable
- An increase in the TMBC housing requirement is difficult to achieve in a borough with high green belt constraints. It will be important to maintain some level of local control by achieving and supporting the TMBC LP
- New targets based on housing density a cause for concern and concern expressed re deliverability.

Chapter 5: Brown Field, grey belt and Green Belt: Q20-46

- Concern that green belt boundaries softened and special circumstances erased.
- Definition of limited contribution and what constitutes green open space – confusing language.
- Comment that traveller sites considered more reasonable in the green belt. Views are sought on this element and it is hoped that more will be understood once the new NPPF published.
- Grey belt – how much cost involved as assessment on green belt already started. Work undertaken so far is a good foundation although new work will need to be undertaken to reflect new NPPF. Will be increased costs to meet criteria of revised NPPF. (Q23)
- Concern that new call for sites will be required. Significant increase in housing targets will lead to new call for sites to identify as many sites as possible – this will improve options and potentially choice if additional sites are submitted.
- Green belt release in the right location could be good planning for the future.
- Most sustainable changes to green belt since NPPF introduced. Grey belt difficult to develop under current housing rules and unlikely to deliver much. Could lead to speculative development, important for the BC to plan/assess to defend unacceptable development. Need to move forward quickly on updating green belt evidence base.

Chapters 6 & 8: Delivering affordable, well-designed homes and places + Delivering community need: Q47-81

- Concern around affordable housing and the removal of the requirement for the delivery of 10% of homes to be affordable home ownership. This will provide TMBC the ability to identify and deliver the affordable housing product most needed.
- Design codes on a local basis – should improve design quality
- Welcomed removal of beauty as reason for refusal as subjective.

Chapter 9: Supporting green energy and the environment: (Q72-73)
<ul style="list-style-type: none"> <li>• Should be mandatory that developers put solar panels on all new housing - consider as policy in the LP – this could be a topic for member engagement</li> <li>• Water cycle also should be considered.</li> </ul>
Chapters 10: Changes to Local Plan intervention criteria: (Q87-88)
<ul style="list-style-type: none"> <li>• No comments</li> </ul>
Chapter 12: The future of planning policy and plan making: (Q103-106)
<ul style="list-style-type: none"> <li>• Duty to co-operate – position is now more challenging due to housing targets. Strategic discussions referenced in NPPF consultation – what does BC need to be mindful of. Importance of Duty to Cooperate elevated. Cross boundary issues, infrastructure – onus on LAs for effective communication and resolutions to strategic cross boundary matters.</li> </ul>
Chapters 7: Building infrastructure to grow the economy (Q62-66)
<ul style="list-style-type: none"> <li>• Build infrastructure to meet current needs as well as future needs.</li> </ul>
Chapters 11: Changes to the planning application fees and LA recovery of NSIP project: (Q89-102)
<ul style="list-style-type: none"> <li>• Commented that increased fees potentially increased income – ring fence for planning department given the ongoing significant costs arising from revised NPPF. Important to resource Service adequately, strengthen service provided. To meet the costs of managing.</li> <li>• Cost recovery – review what fees should be set at; balance between not deterring applicants and generating income. Set locally rather than nationally.</li> <li>• Enforcement, heritage and conservation – BC require help in this area to ensure the standard of advice is presented to Planning Committee and is considered in the local plan process.</li> </ul>
Annex 4: Local Plan evidence:
<ul style="list-style-type: none"> <li>• Noted local plan evidence base commissioned to date. Annex 4 set out potential future evidence base requirements</li> <li>• Landscape sensitivity assessments – when brought forward as fundamental for DM decisions. Staged approach and landscape assessment of whole borough will need to be stage 1. Huge piece of work. (Q135)</li> </ul>

Annex 5: Local Plan Risk Assessment:

- Transport modelling – how far along the process are the BC. Once in better position re NPPF and housing numbers, sites and options will need to be tested through transport modelling. Cross border impacts noted – part of strategic discussions with neighbours. (Q35)