



Proposed reforms to the National Planning Policy Framework and other changes to the planning system

Consultation Response from Odiham Parish Council

No	Question	OPC response	Explanation
1	Do you agree that we should reverse the December 2023 changes made to paragraph 61?	No	Local planning authorities (LPAs) should have flexibility to work on the basis of a different approach to deciding on housing need in response to local conditions. The current policy is working. Our LPA (Hart) has not tried to produce the bare minimum but has worked hard to deliver housing and has provided significantly more than the identified need, despite difficult circumstances. At the parish level too, we have garnered community support for new homes, allocating several sites for a significant number in total. We are now reviewing our made neighbourhood plan and can show we are broadly on course to deliver the numbers planned.
2	Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?	No	See our explanation for our answer to Question 1.
3	Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?	Yes	The largest cities and towns should be required to provide more of the new housing because they have better infrastructure. However, the urban uplift is probably too crude a method.
4	Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?	No	In rural areas (such as ours), new development must respect the existing urban form.
5	Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?	No	Design coding is important for all development.
6	Do you agree that the presumption in favour of sustainable	Yes	Every LPA should have an up-to-date local plan for its area and this will encourage them to do so.



	development should be amended as proposed?		
7	Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?	Yes	However, we disagree with the underlying approach (ie the standard method) and believe some flexibility is needed where there are extenuating circumstances – see our response to Questions 1 and 2.
8	Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?	No	Significant over-supply should be taken into account, especially where the proposed new approach to identifying need would entail a large increase in the numbers of new homes needed (as in Hart).
9	Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?	n/a	We have no comment on this matter
10	If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?	n/a	We have no comment on this matter
11	Do you agree with the removal of policy on Annual Position Statements?	n/a	We have no comment on this matter
12	Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?	Yes	More effective cooperation is needed to ensure that the housing needs of a sub-region (ie an area wider than that covered by a single LPA) are met in the best places, irrespective of administrative boundaries.
13	Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?	n/a	We have no comment on this matter
14	Do you have any other suggestions relating to the proposals in this chapter?	No	We have no comment on this matter
15	Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?	No	Employment and infrastructure should be the key factors, not the number of existing homes
16	Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is	n/a	We have no comment on this matter



	available to adjust the standard method's baseline, is appropriate?		
17	Do you agree that affordability is given an appropriate weighting within the proposed standard method?	No	The proposal gives far too much weight to affordability. The key factors should be the availability of employment and provision of infrastructure – see our answer to Question 15.
18	Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?	No	See our answer to Question 17.
19	Do you have any additional comments on the proposed method for assessing housing needs?	No	We have no comment on this matter
20	Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?	n/a	We have no comment on this matter as there is no Green Belt land in this parish.
21	Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?	n/a	We have no comment on this matter as there is no Green Belt land in this parish.
22	Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?	n/a	We have no comment on this matter as there is no Green Belt land in this parish.
23	Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?	n/a	We have no comment on this matter as there is no Green Belt land in this parish.
24	Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?	n/a	We have no comment on this matter as there is no Green Belt land in this parish.
25	Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?	n/a	We have no comment on this matter as there is no Green Belt land in this parish.



26	Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?	No	We have no comment on this matter as there is no Green Belt land in this parish.
27	Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?	No	We have no comment on this matter as there is no Green Belt land in this parish.
28	Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?	n/a	We have no comment on this matter as there is no Green Belt land in this parish.
29	Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?	n/a	We have no comment on this matter as there is no Green Belt land in this parish.
30	Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?	n/a	We have no comment on this matter as there is no Green Belt land in this parish.
31	Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?	No	We have no comment on this matter as there is no Green Belt land in this parish.
32	Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?	No	We have no comment on this matter as there is no Green Belt land in this parish.
33	Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local	No	We have no comment on this matter as there is no Green Belt land in this parish.



	planning authority should undertake a Green Belt review?		
34	Do you agree with our proposed approach to the affordable housing tenure mix?	n/a	We have no comment on this matter as there is no Green Belt land in this parish.
35	Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?	n/a	We have no comment on this matter as there is no Green Belt land in this parish.
36	Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?	n/a	We have no comment on this matter as there is no Green Belt land in this parish.
37	Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?	n/a	We have no comment on this matter as there is no Green Belt land in this parish.
38	How and at what level should Government set benchmark land values?	n/a	We have no comment on this matter as there is no Green Belt land in this parish.
39	To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?	No	We have no comment on this matter as there is no Green Belt land in this parish.
40	It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?	No	We have no comment on this matter as there is no Green Belt land in this parish.
41	Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?	n/a	We have no comment on this matter as there is no Green Belt land in this parish.



42	Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?	No	We have no comment on this matter as there is no Green Belt land in this parish.
43	Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?	No	We have no comment on this matter as there is no Green Belt land in this parish.
44	Do you have any comments on the proposed wording for the NPPF (Annex 4)?	No	We have no comment on this matter as there is no Green Belt land in this parish.
45	Do you have any comments on the proposed approach set out in paragraphs 31 and 32?	No	We have no comment on this matter as there is no Green Belt land in this parish.
46	Do you have any other suggestions relating to the proposals in this chapter?	No	We have no comment on this matter as there is no Green Belt land in this parish.
47	Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?	Yes	Social rental homes are important and should remain as such in perpetuity.
48	Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?	Yes	Affordable home ownership is often a valuable form of provision but we agree that there should be flexibility as to the specific types of tenure that are required to be provided.
49	Do you agree with removing the minimum 25% First Homes requirement?	Yes	We agree that there should be flexibility as to the specific types of tenure that are required to be provided.
50	Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?	No	
51	Do you agree with introducing a policy to promote developments that have a mix of tenures and types?	Yes	



52	What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?		The most appropriate way would be to provide additional funding (ie loan finance, grants and/or subsidies). Developers will not build them unless its viable to do so.
53	What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?		A maximum size (eg number of units) might be the answer. If so, the number might be in the range 20- 25 homes.
54	What measures should we consider to better support and increase rural affordable housing?		See our answer to Question 52.
55	Do you agree with the changes proposed to paragraph 63 of the existing NPPF?	Yes	It would be beneficial to include explicit reference to meeting the needs of 'looked after children'.
56	Do you agree with these changes?	Yes	This Council is interested in getting involved in and/or assisting community-led development.
57	Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?	Yes	The definition should include reference to community-led developers and other orgs that are not Registered Providers (eg local charitable bodies).
58	Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?	Yes	It requires more resources for LPAs producing plans because it is time-consuming for them to deal with a large number of small sites (as compared to a small number of large ones).
59	Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?	Yes	Design important but 'beauty' and 'beautiful' are too subjective.
60	Do you agree with proposed changes to policy for upwards extensions?	Yes	There needs to be flexibility as to how such extensions are designed. However, in all cases care needs to be taken to avoid problems of overlooking.
61	Do you have any other suggestions relating to the proposals in this chapter?	No	
62	Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?	Yes	We agree with the rationale provided in the consultation document. However, there need to be adequate safeguards against harm to the environment, highway safety, etc.
63	Are there other sectors you think need particular support via these changes? What are they and why?	No	



64	Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?	No	Such proposals should be subject to local decision-making.
65	If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?	n/a	We have no comment on this matter
66	Do you have any other suggestions relating to the proposals in this chapter?	No	
67	Do you agree with the changes proposed to paragraph 100 of the existing NPPF?	Yes	We agree that more weight should be placed on new public service infrastructure.
68	Do you agree with the changes proposed to paragraph 99 of the existing NPPF?	Yes	We agree that more weight should be placed on new provision for early years and post-16 education.
69	Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?	Yes	We agree with what we understand by a 'vision-led' approach to transport planning (but further explanation is needed).
70	How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?		Clear guidelines for inclusion of recreation space and play equipment with formulae for ongoing developer contribution to maintenance over at least 10 years on developments over a certain size?
71	Do you have any other suggestions relating to the proposals in this chapter?	No	
72	Do you agree that large onshore wind projects should be reintegrated into the s NSIP regime?	No	Such proposals should be subject to local decision-making.
73	Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?	Yes	We agree such projects warrant greater support. However, this is subject to impacts being addressed adequately.
74	Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or	Yes	Such habitats must be protected.



	compensatory mechanisms put in place?		
75	Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?	No	Such proposals (ie up to 100MW) should be subject to local decision-making. However it is important to understand the number of acres which will be used as the output of power from wind turbine changes as they are improved. A limit on the acreage taken out of food production should be set.
76	Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?	No	Such proposals (ie up to 100MW) should be subject to local decision-making. However it is important to understand the number of acres which will be used as the output of power from a solar panel changes as they are improved. A limit on the acreage taken out of food production should be set.
77	If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?	See comment	These thresholds should take into account local characteristics.
78	In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?	n/a	We have no comment on this matter
79	What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?	n/a	We have no comment on this matter
80	Are any changes needed to policy for managing flood risk to improve its effectiveness?	n/a	We have no comment on this matter
81	Do you have any other comments on actions that can be taken through planning to address climate change?	No	
82	Do you agree with removal of this text from the footnote?	No	It is essential to protect high quality farmland and this text, whilst not specific, flags its importance.
83	Are there other ways in which we can ensure that development supports and does not compromise food production?	Yes	Further explanation and clarification can be provided (see our answer to Question 82).
84	Do you agree that we should improve the current water	n/a	We have no comment on this matter



	infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?		
85	Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?	n/a	We have no comment on this matter
86	Do you have any other suggestions relating to the proposals in this chapter?	No	
87	Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?	n/a	We have no comment on this matter
88	Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?	n/a	We have no comment on this matter
89	Do you agree with the proposal to increase householder application fees to meet cost recovery?	Yes	LPAs clearly need more resources.
90	If no, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.	n/a	See our answer to Question 89.
91	If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?	Don't know	LPAs are best placed to comment on this.
92	Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.	n/a	We have no comment on this matter. LPAs are best placed to comment on this.
93	Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons	n/a	We have no comment on this matter. LPAs are best placed to comment on this.



	and provide evidence on what you consider the correct fee should be.		
94	Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?	No	This would add extra complexity.
95	What would be your preferred model for localisation of planning fees?	Don't know	We have no comment on this matter
96	Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?	No	This should not be necessary, given the mainstream funding available to LPAs.
97	What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?	n/a	We have no comment on this matter
98	Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?	n/a	We have no comment on this matter
99	If yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.		We have no comment on this matter
100	What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?		We have no comment on this matter
101	Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.		We have no comment on this matter



102	Do you have any other suggestions relating to the proposals in this chapter?	No	
103	Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?	n/a	We have no comment on this matter
104	Do you agree with the proposed transitional arrangements?	n/a	We have no comment on this matter. LPAs are best placed to comment.
105	Do you have any other suggestions relating to the proposals in this chapter?	No	We have no comment on this matter
106	Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?		We have no comment on this matter