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Ms. Linda Ford
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18th August 2011

Our Ref: LDF 2011 - 3

Dear Ms. Ford

OLDHAM LOCAL DEVELOPMENT FRAMEWORK JOINT CORE STRATEGY AND DEVELOPMENT MANAGEMENT POLICIES DEVELOPMENT PLAN – DEVELOPMENT PLAN DOCUMENT

Thank you for your email dated the 28th July 2011 referring to the consultation draft of the National Planning Policy Framework (NPPF).

Background

I wrote to you on the 25th November 2010 setting out representations on various issues and policies within the “proposed submission” and the “proposed submission appendices” on behalf of a number of clients. A list of clients was provided.

I provided additional information regarding, in particular, garden development, on the 18th May 2011, immediately prior to the Hearing.

I also attended various sessions of the Hearing and took part in discussions with the Inspector and the Council as appropriate. My comments on the NPPF relate to my own submissions to the Hearing and also to the Councils.

Comments on the NPPF

Delivering Sustainable Development

In Section 3 of my November letter I referred to the need to improve the image of Oldham and to

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adopt a development-led approach to encourage investment in the borough.

The NPPF reference to a presumption in favour of sustainable development is welcomed and would support the views that we put forward.

In particular paragraph 13 states:-

“The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. A positive planning system is essential because, without growth, a sustainable future cannot be achieved. Planning must operate to encourage growth and not act as an impediment. Therefore, significant weight should be placed on the need to support economic growth throughout the planning system.”

Paragraph 14 states:-

“At the heart of the planning system is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision making. Local planning authorities should plan positively for new development, and approve all individual proposals wherever possible”

Paragraph 19 states:-

“Planning should pro-actively drive and support the development that this country needs. Every effort should be made to identify and meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Decision-takers at every level should assume that the default answer to development proposals is “Yes”, accept where this would compromise the key sustainable development principles set out in this framework.”

It is our view that the Vision, Key Objectives and the way that these are to be achieved, and in turn the Policies, should be more upbeat in the LDF. The NPPF supports this view.

Plan Making

In this part of the NPPF, paragraph 20, and a number of other paragraphs also refer to a presumption in favour of sustainable development.

In section 28 – Housing Requirements – the NPPF states that local planning authorities should:-

“address the need for all types of housing, including affordable housing and the needs of different groups of the community (such as families with children, older people, disabled people, service families and people wishing to build their own homes) and cater for housing demand and the scale of housing supply necessary to meet this demand.....”

We fully support this statement. In order to provide an address of choice for all, as referred to in the Oldham LDF submission, a range of dwelling units in a range of geographical areas should be provided to enable this to become a reality.

Development Management

We welcome the reference in paragraph 54 which states that local planning authorities need to:-

- *Approach development management decisions positively – looking for solutions rather than problems so that applications can be approved wherever it is practical to do so;*
- *Attach significant weight to the benefits of economic and housing growth"*

Planning for Prosperity

Section 81 – Supporting the Rural Economy - refers to tourism. It states:-

“Planning strategy should include policies to support sustainable rural tourism and leisure developments that benefit rural businesses, communities and visitors and which respect the character of the countryside. This should also include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified need is not met by existing facilities in rural service centres.”

Tourism is an issue that we feel needs to be addressed more fully in the LDF. The policy content needs to be expanded.

Planning For People - Housing

In our submission to the LDF Hearing we made strong reference to the need for a more flexible approach to housing in Oldham to allow a range of housing types to be accommodated in appropriate geographical locations. It is our view that the identified housing sites are too heavily concentrated in the built up areas of Oldham to the detriment of the satellite districts and villages. There would appear to be a particular lack of opportunity for upper market housing in these areas in the LDF provision. We also comment strongly on the need to take a more relaxed approach to garden development as these are a source of individual high quality housing development, most of which has traditionally come forward as windfall sites.

We welcomed the approach set out in the housing section of the NPPF; in particular paragraph 107 which refers to the need to deliver a wide choice of high quality homes that people want and need.

Paragraph 108 states that:-

“To enable this the planning system should aim to deliver a sufficient quantity, quality and range of housing consistent with the land use principles and other policies of this Framework.”

Also welcome is the Government’s intention to boost the supply of housing, in particular by including an additional allowance of at least 20% over the identified five years supply, to ensure choice and competition in the market for land. The exclusion of windfall sites from the five years supply is also welcomed.

In Oldham's case, windfall sites have traditionally provided a mixed range of housing, especially middle and upper market housing in appropriate locations where infrastructure is already available. Small windfalls sites also provide a source of employment for local builders and enable local architects to produce innovative designs. This is referred to in the Design section of the NPPF.

Paragraph 111 of the NPPF supports our view that in order to deliver a wide choice of quality homes local planning authorities should:-

“identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand”

Green Belt

The content of the Green Belt section of the NPPF appears to incorporate most of the content of PPG2, in a more simplified form. We would however draw attention to paragraph 138 which states that the appropriateness of existing green belt boundaries should only be considered when a Local Plan is being prepared or reviewed.

As stated in our submission to the LDF Review there are a number of green belt boundary anomalies in the Oldham area and we would strongly request that these be reviewed at the site allocation stage of the LDF.

Once reviewed and the anomalies dealt with, the boundaries can then be regarded as fixed for many years.

With regard to the content of the green belt section of the NPPF I feel that, in its present form, it is a missed opportunity to update green belt policies to allow greater flexibility to suit modern times. We will be responding to the draft document directly to the Government.

I hope the above is helpful. I will be happy to provide any further comment or information, or discuss issues directly with Oldham Council, should this be helpful.

Yours sincerely

ALAN CHORLTON