

**PRIVATE & CONFIDENTIAL - SUMMARY OF INFORMATION FROM ORGANISATIONS' RESPONSES TO THE NPPF CONSULTATION**

*Proposed reforms to the National Planning Policy Framework and other changes to the planning system: Consultation by the Ministry of Housing, Communities and Local Government.*

<https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system>

*A seemingly good suggestion is to not answer yes/no to any questions but put this in the text box in wording so that the answers have to be scrutinised. Having looked through the questions, they are not always a yes/no answer and there are nuances that may be lost in statistics if they just looking at the yes/no responses rather than the wording. It is your decision whether you choose this approach or not. Roddie Hogarth expressed concern at the Farningham Parish Council meeting that there will be an AI bot looking at the responses and this may not be a bad idea.*

*Please note there has not been time to fact check all the responses are 100% accurate and please bear this in mind for your responses and some information has been removed from CPRE submission due to confidentiality and plagiarism risks. **Please put this into your own words if used.***

<b>Q #</b>	<b>Question wording</b>	<b>Sevenoaks Town Council response NB not final version</b>	<b>London Green Belt Council tips applied</b>	<b>CPRE extracted information from their draft response.</b>	<b>Other suggested responses</b>	<b>POGBT</b>
<b>1.</b>	<b>Do you agree that we should reverse the December 2023 changes made to paragraph 61?</b>	No – it is important that Local Planning Authorities are able to look on exceptional circumstances to help them meet housing numbers – especially in authorities which are made up of a high percentage of Green Belt. Neighbourhood Development Plans can		No.  Needed homes must integrate environmental capital and undeveloped land. Recommends some re-wording.  Specific needs of the local communities highlighted with a call for clarity.  Aim to set a housebuilding target considering integrating economic, social and environmental policy.	No. Housing need should be considered more strategically across areas, particularly when one location is unable to meet its need defined through the standard method due to lack of land or predominance of	No. We would welcome a more strategic approach to the “needs” in terms of homes and where they are located. We would also appreciate the flexibility remaining to make allowances for

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		<p>be, and in Sevenoaks Town Council's case, have been, particularly successful in helping the Town meet housing demand through the targeted identification of Green Belt sites – with the significant advantage that NDPs are well consulted-upon and publicly endorsed.</p>			<p>national landscape or greenbelt. A degree of flexibility enables a more effective and realisable approach in many situations. Reversing this decision is a retrograde step and instead a more strategic approach to housing need across boundaries should be considered.</p>	<p>important nuances. We also suggest more consideration of housing needs being met from across boundaries.</p>
2.	<p><b>Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61</b></p>	No		<p>No. Text should not be removed, as in the context of preparing strategic policies, this may be calculated using a justified alternative approach.</p> <p>Basing the Standard Method on affordability assumptions is flawed. There needs to be a relationship between releasing more land for housing through the planning system and the affordability</p>		<p>No, the text should not be removed. We would like to see a more reasonable solution than the Standard Method as this</p>

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	and the glossary of the NPPF?			<p>of housing on the other. The Standard Method has not yielded good housing outcomes demonstrated by shortages of homes, especially rurally, some due to second homeowners.</p> <p>The proposed Standard Method linked to housing stock does not work illustrated by vacancy rates.</p>		has not worked well previously.
3.	<b>Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?</b>	Yes – STC appreciates that there is need for more housing in urban areas, however considers there to also be an important need also to accommodate urban uplift in rural areas. Development in rural areas can happen and should be encouraged, in the appropriate circumstances.		<p>Yes. Brownfield first. The current urban uplift is not helpful due to generating unrealistic high urban targets, which developers are then encouraged to seek releases of surrounding countryside.</p> <p>Encouraged target setting that takes into account local needs, brownfield site availability and real projections of achievable deliveries.</p> <p>Observes carbon impact of reusing brownfield sites is lower in centrally located brownfield sites than in existing urban areas with proximity to employment centres and existing infrastructure (sustainable) compared to building out remote green fields without public transport, schools, hospitals and utilities connection costs. Remote sites encourage car-dependency.</p>		Yes, we support the deletion of this paragraph and ensure that rural areas and countryside is not impacted negatively. Brownfield reuse is more sustainable and we support the maximisation of use of brownfield so that sustainability is achieved and less car-dependency is generated.

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4.	<b>Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?</b>	No - protections need to continue to exist to safeguard the character and heritage of towns and villages.		<p>Yes. Support strengthening expectations that plans should promote an uplift in density in urban areas, and should be more prescriptive on density.</p> <p>Suggest calling for medium densities (30-50 dwellings per hectare).</p> <p>Recommend the NPPF with higher densities happening where justification from local circumstances and character.</p>		<p>We support the efficient use of land in areas well served by transport and other infrastructure. Paragraph 130 should be removed with careful consideration. We hope to protect the character and heritage of local areas and ensure that the density is in keeping with the local area. The release of Green Belt should be the most sympathetic it can be achieved if it is absolutely necessary, and</p>

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						all other options are exhausted. Where density can be increased with consideration, we support the amendment.
5.	<b>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?</b>	Yes, Sevenoaks Town Council supports the use of spatial plans and recommends that placemaking be considered at this stage. The Town Council is using its adopted Neighbourhood Development Plan as the basis for two spatial Masterplans for the Town and hopes that other Towns will follow suite. These will provide the basis for future developments to encourage placemaking	Priority of brownfield first. Question the use of greenfield being allowed after brownfield is nearly exhausted.  Brownfield registers not up to date, and no demonstration of research and analysis of brownfield land having been carried out. CPRE report illustrates this. The cost of	Yes. Supports vision-led master planning and design codes to achieve greater density. E.G. two-storey semi-detached homes is not an efficient or effective use of land.  Advocates neighbourhood plans to help local areas retain local distinctiveness.		Yes. Greater density when a new development is essential and maximising the efficiency of use of the land with brownfield first as a priority. We believe there must be a more robust assessment of brownfield registers and an active pursuit of current assessment of

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		to be incorporated to their designs at the early stages, and cohesion between individual developments.	brownfield development needs to be balanced against the cost of infrastructure and subsidisation of clearance and decontamination from the Government needs to be considered. Consideration for brownfield sites in the Green Belt which are not sustainably located. Consideration of larger developers in relation to London Green Belt on the edge of urban developments and how the owners are distributed. Speculative			brownfield. We also encourage neighbourhood plans locally to protect the areas and retain the attributes of the existing areas and ensure standards are achieved in making new developments. Greenfield development should not be considered until brownfield is completely utilised to it's maximum density.

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			development risks and how this counters meeting the housing need, being developer led rather than Plan led.			
6.	<b>Do you agree that the presumption in favour of sustainable development should be amended as proposed?</b>	No – Sevenoaks Town Council recommends that shouldn't happen without clear and robust government legislative guidance, and considers that clarification is required as to the components and criteria of what "sustainable development" encompasses. This is currently missing and the definition ambiguous, creating opportunity for developers and landowners to provide alternative interpretations ranging from durability, eco-		<p>No. Concerned a five-year housing land supply, will prove to be ineffective in their own terms. Observe current problem of developers arguing land with permission be removed from local five-year housing supply and say it is now unviable or undevelopable.</p> <p>Developers restrict supply of houses to generate high property prices. To generate more incentive for builders, a clear definition of sustainable development. Some suggested wording. Should put onus on developers to show how the positive impact is on sustainable development instead of Local Authority.</p> <p>Wording change to emphasise developers' roles to increase timely delivery.</p>		No, these are very concerning proposals with too basic an approach. The purpose should not be to meet the housing supply numbers no matter what the costs are. We are extremely worried about the impact of the tilted balance and the lack of regard for important

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		<p>friendliness, affordability or contribution to housing numbers. Historically, this policy has been used by developers to support planning applications in areas of low housing supply for developments not suitable for the site. If the MHCLG is minded to strengthen the presumption, then there must be clear guidelines as to what it “sustainable” means, and there needs to be consideration of the impact on existing the community.</p> <p>In addition, Sevenoaks Town Council recommends that Neighbourhood Development Plans should be included in the definitions of “relevant development plan policies” when</p>				<p>issues such as sustainability and we would like to see “land banking” eradicated and the invitation to builders to build on land that wouldn’t be viable or considerate of the existing communities. We agree with Sevenoaks that reference to Neighbourhood Development Plans should be included in the decision-making process as these are a reflection of the local community support.</p>



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		<p>they allocate the proposed site in question or allocate a considerable/significant contribution towards the Town/Parish's housing supply requirements. Neighbourhood Development Plans should be given a more significant weight in the decision making process, as they locally endorsed policy documents supported at Referendum and created in direct collaboration with community groups. They are frequently more up to date than principle Authority documents and should be used as a representation of local residents' priorities.</p>				
7.	<b>Do you agree that all local planning</b>	Yes. Sevenoaks Town Council supports this, as it enables longer term		No. Recommended changes and use of a robust assessment for housing needs and wording to delivery.		No. Robust assessment for housing needs

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	<b>authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?</b>	planning and fits better with Neighbourhood Development Plans (NDPs), Masterplans and planning for sustainability. It should also reflect needs expressed in NDPs.		<p>Reduce costs of defencing refusal of sites not suitable at appeal.</p> <p>It is reasonable in principle to expect LPAs to review local plans every five years and demonstrate a 5-year supply of housing land. However, it is unreasonable to allow developers to challenge the supply at local plan when funding has been agreed.</p> <p>Recommends that the Housing Delivery Test be changed to provide breakdowns of completed houses, affordable housing linked to average salaries.</p> <p>Brownfield focus on actual affordable housing and reusing wasted land.</p>		and supply is required. There should be a genuine use of wasted land assessed with priority instead. We believe this proposal would not be cost-effective and will dilute the attention giving the developers more opportunity to challenge rather than protect from the potential abuse of this system by developers.
8.	<b>Do you agree with our proposal to remove wording on national</b>	Yes. Sevenoaks Town Council supports this, however recommends that this needs to be set against a continuous		No. Concerns that the demonstration of a five-year housing land supply pressure would facilitate permitting development on greenfield sites and this should not be allowed.		No, the wording should not be removed as it could result in over-delivery.

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	<b>planning guidance in paragraph 77 of the current NPPF?</b>	evaluation of need as well as supply, to prevent over-supply where it isn't needed. Clarification is also needed on oversupply in regards to whether it relates to completed homes, or simply deliverable sites which have been Granted planning permission but which have not commenced/finished construction.		Invites government to increase stability, and confidence of investors in the development industry.  Developers have too much agency and it needs to be fair on the Local Authority.		This would then invite development without the necessary address of requirements and standards. There needs to be protection from excessive building and not necessary attention being given to over-supply issues.
9.	<b>Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?</b>	No – Sevenoaks Town Council does not consider this isn't necessary.		No. CPRE disagrees with adding a 5%.  In instances of under-supply, CPRE can see the requirements for a buffer but they should not be based on inaccurate statistics from Office of National Statistics data and has concerns about growth projections that have previously not come to fruition.  They question the affordability calculation and how that's led to		No we are concerned that a 5% buffer will be risky. We believe developers should be pressured more into producing housing promptly rather than the

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				inaccurate housing targets and they would like to see an improved needs assessment mechanism that facilitates performance analysis of the LPA and a shift from LPA monitoring to developer monitoring.		local authorities being held accountable. The use of accurate National Statistics information is not reliable enough and there are too many variables. Until the housing targets can be more reliably predicted, this should not be applied.
10.	If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?	No.		No, as mentioned previously.		n.a. as we have replied no.
11.	Do you agree with the removal of	No comment.		Yes, most LPAs can review in another way that is more efficient both in costs and resources.		Yes, to keep costs down and efficiency up.

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	policy on Annual Position Statements?					We understand there are other ways of reviewing the housing land supply that will be carried out and this would not be necessary.
12.	<b>Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?</b>	Yes – as Town in a district which is 93% Green Belt and with neighbouring districts similarly constrained, Sevenoaks Town Council supports this amendment, as it considers cooperation to be vital to delivering housing in the South East.		Yes. CPRE invited talking about new ways of cross-boundary strategic planning to be included in the NPPF regarding net zero, housing, jobs, infrastructure, growth plans and nature recovery and support Spatial Development Strategies.	Yes. In particular in the case of District or Borough authorities in a two-tier county system it is important to plan more strategically to meet sub-regional housing needs in a more effective and efficient way to achieve sustainable development.	Yes. We believe this to be important for delivery of the housing, particularly in areas with a high percentage of Green Belt. We believe this will facilitate needs being met in the right areas and aid in sustainable development. We support Spatial Development

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						Strategies and cooperation to provide the right things in the right places.
13.	<b>Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?</b>	Yes – Sevenoaks Town Council considers it important that these tests include community engagement and a joined-up approach between the developer and Local Authority responsible for infrastructure. Infrastructure plans need commitments from Highway and railway, water and sewage companies to deliver the required infrastructure, ahead of or alongside any planning application which would require their cooperation or input. These strategic scale proposals also		Yes. We agree amendments to facilitate affordable housing being delivered later in the development, if needed due to site remediation burdens. Demand on resources to enforce was also noted.		Yes. It is important to ensure there is a collaborative effort so as not to delay the delivery of housing and to tighten up the flexibility on movable elements such as affordable housing. A timeline and pressure on the developer to deliver in a timely way, such as penalties for not doing so would be a good idea. We

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		<p>need to be done transparently and with public consultation in order to give residents the confidence that the infrastructure will be delivered with or before development. Currently this doesn't appear to be part of the test of soundness and proposes no confidence that the area will be able to support the additional housing. Sevenoaks Town Council also considers that the developer needs to be responsible for implementing any required infrastructure, so it is planned into the scheme and the impact on local community pre-emptively mitigated, as opposed to the developer paying for enhancements which will take place after development.</p>				<p>would like to see all the facts being considered very early on in terms of deliverability and viability. We would like this to be evidenced earlier so that resources aren't wasted on pursuing when it is not viable.</p>

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14.	<b>Do you have any other suggestions relating to the proposals in this chapter?</b>	<p>Sevenoaks Town Council considers that government legislation needs to change with a timeframe for delivery upon identification of housing land, and granting of planning permission. Currently there is no obligation for this, and delivery of housing is primarily contingent on private developers and the profitability of their sites.</p> <p>In addition, the Town Council considers that if Local Planning Authorities are judged by land supply calculations and forward plans for housing delivery, there should also be a system to go alongside which measures actual delivery. There are many sites which have</p>		Requirement for LPA to comment at Regulation 19 as strategic stakeholders.		<p>To ensure that timescales are met in terms of delivery by penalising developers for delays.</p> <p>To ensure a more scientific approach to meeting needs of various areas. To always ensure there is an apportionment of provisions such as healthcare and hospitals.</p>



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		secured planning permission, but have not and do not appear to be planning to deliver in the near future. Government legislation therefore needs to be centrally amended to secure this.				
15.	<b>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?</b>	No comment.		<p>No. Notes the necessity of providing needs measure but also noted current Standard Method is flawed.</p> <p>Requirements for proper local housing need assessment and struggle to understand how that's been met and sees flaws unless Government encourages migration to all parts of the country.</p> <p>CPRE suggests a break down alternative and brownfield to focus on truly affordable housing and utilising wasted land resources.</p>		
16.	<b>Do you agree that using the workplace-based median house price to</b>	Sevenoaks Town Council recommends that any method of calculating the baseline needs to recognise that		Yes. See house price to earnings as measure of affordability and wants planning to focus on social rental housing.		

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	<p><b>median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?</b></p>	<p>there are some places, including Sevenoaks Town, where part of the local housing market is dominated from salaries from elsewhere – primarily London which has a higher average salary.</p>				
17.	<p><b>Do you agree that affordability is given an appropriate weighting within the proposed standard method?</b></p>	<p>No – Sevenoaks Town Council advises that it is a challenge to give affordability the appropriate weighting because local weighting doesn't take into consideration the average salary of those working within a Town versus commuting from that Town into London – and especially in Towns where a large percentage of local people work in higher earning areas such as London.</p>		<p>No. The Standard Method flawed in assumptions due to investing in 2<sup>nd</sup> houses. The Government should discourage multiple homes and withdrawal of occupation for long periods of time, which reduces economic activity.</p>		<p>No. There needs to be a better affordable housing ratio to developments.</p>

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		<p>In addition, there is no enforcement or legal framework to bind developers to deliver the required percentage of affordable housing, which gives leeway for sites to achieve planning permission with no or significantly less affordable housing provision than required under policy. It therefore would not matter which weight affordable housing is given, because this will be overridden in a case by case basis when developers prove that it is not viable.</p> <p>This impacts and undermines affordability because it causes the housing prices to rise. If land prices are set by the market, landowners will continue to underdeliver on</p>				

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		affordable housing because it is not financially viable for them to do so.				
18.	<b>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?</b>	Sevenoaks Town Council reiterates its earlier point, being that it is a challenge to give affordability the appropriate weighting because local weighting doesn't take into consideration the average salary of those working within a Town versus commuting from that Town into London – and especially in Towns where a large percentage of local people work in higher earning areas such as London. In addition, there is no enforcement or legal framework to bind developers to deliver the required percentage of affordable housing, which gives leeway for		Yes.  Evidence requires more due diligence and around rental sector and second home and short term let influences.		

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		<p>sites to achieve planning permission with no or significantly less affordable housing provision than required under policy. It therefore would not matter which weight affordable housing is given, because this will be overridden in a case by case basis when developers prove that it is not viable.</p> <p>This impacts and undermines affordability because it causes the housing prices to rise. If land prices are set by the market, landowners will continue to underdeliver on affordable housing because it is not financially viable for them to do so.</p>				
19.	<b>Do you have any additional comments on</b>	Sevenoaks Town Council reiterates its earlier point, being that		Suggested alternative method to achieve better quality data.		Green Belt land should be protected from

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	<b>the proposed method for assessing housing needs?</b>	<p>it is a challenge to give affordability the appropriate weighting because local weighting doesn't take into consideration the average salary of those working within a Town versus commuting from that Town into London – and especially in Towns where a large percentage of local people work in higher earning areas such as London.</p> <p>In addition, there is no enforcement or legal framework to bind developers to deliver the required percentage of affordable housing, which gives leeway for sites to achieve planning permission with no or significantly less affordable housing provision than required under policy. It therefore would not</p>		<p>Deal with investment and deem long term tenants rather than short term lets.</p> <p>Increased height and higher densities of housing supports the 30% target increase in town and city centres.</p>		<p>degeneration to become considered to be grey belt land.</p> <p>Brownfield must be optimised to provide the most housing possible and with affordable housing and infrastructure.</p> <p>Green belt should be appreciated and preserved with brownfield land maximisation being prioritised.</p>

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		<p>matter which weight affordable housing is given, because this will be overridden in a case by case basis when developers prove that it is not viable.</p> <p>This impacts and undermines affordability because it causes the housing prices to rise. If land prices are set by the market, landowners will continue to underdeliver on affordable housing because it is not financially viable for them to do so.</p>				
20.	<p><b>Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?</b></p>	<p>Yes.</p>		<p>Yes. CPRE support a 'brownfield first' approach, prioritising the development of previously developed land.</p> <p>CPRE noted there is sufficient brownfield capacity to deliver 1.2 million homes on 'shovel ready' sites. (CPRE State of Brownfield Report, December 2022, using brownfield register data from 344 local authorities in England)</p>		<p>Yes, brownfield should be priority.</p>

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				<p>Noted that developments are quicker on brownfield than greenfield (CPRE_-_Brownfield_comes_first_March_2016.pdf)</p> <p>Noted that isolated and unsustainable locations in the countryside need to be factored in to assess suitability, i.e. served by footpaths on adjoining main roads and local services, e.g. schools, shops, buses, employment and green spaces and discouraged car use.</p> <p>Noted heritage, ecological and biodiversity constraints, transport, flood risk etc all be considered fully.</p> <p>Evidence to support new development should not be weakened.</p>		
21.	Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of	Yes.		<p>More detail on definition of ‘substantial harm’ is required before CPRE can comment.</p> <p>Focus on sustainable locations encouraged, i.e. within urban areas, settlement boundaries, instead of releasing Green Belt in isolated locations.</p>		



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	PDL in the Green Belt?					
22.	<b>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?</b>	Sevenoaks Town Council recommended that the definition should be left as it is and not expanded.		<p>More detail is required.</p> <p>Not in support of expanding definition of PDL to include glasshouses, as maintaining food production important and temporary nature of glass houses.</p>		
23.	<b>Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?</b>	Sevenoaks Town Council considers there to already be a suitable mechanism for releasing such land by proving exceptional circumstances – and that the decision as to where Green Belt Land could be suitably released or redefined as Grey Belt should be made at a local level.		<p>No. CPRE believes Green Belt policy works as it is and the Very Special Circumstances scope is sufficient.</p> <p>Disagree with proposed definition for 'grey belt' as it is unclear regarding an understanding of how the proposed approach would work.</p> <p>Concerns these changes may slow down rather than speed up housebuilding due to legal challenges from developers.</p>	No. Greater clarity is needed in the grey belt definition to ensure that national landscapes and sites with other environmental designations that are in the greenbelt should not be released	No. Grey belt definition and protection should be clearer. National Landscapes should not be considered for building.

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				<p>Protect against speculative approaches from developers is not apparent.</p> <p>Suggested changes to part iv) in the definition to 'Land which contributes little to preserving the setting and special character of historic towns and villages'.</p> <p>Do not support brownfield site development on Green Belt as proposed and suggest the existing policy wording be retained in this regard.</p>	under any circumstances.	
24.	<b>Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?</b>	Yes – Sevenoaks Town recommends that a robust methodology for allocating grey belt sites is needed, and that this should be done impartially and not led by developers. The current criteria isn't considered sufficiently tight enough to protect valuable high quality Green Belt land from being put forwards by developers.		<p>Concerns about degrading land to gain permission.</p> <p>High level green belt sites being considered for release need to demonstrate the current use as not viable.</p> <p>Footnote 64 which gave Planning scope to protect agriculture in the Green Belt must be reversed to facilitate increase sustainable domestic food production and protect high-quality agricultural land.</p>	Yes. The definition of grey belt should be clear that garden centres, golf courses, and solar farms should not be considered as previously developed land for the purposes of automatically being considered as grey belt.	Yes. Golf courses and solar farms should not be considered as previously developed land and automatically be considered for grey belt. It is very important that the assessment should be impartial.

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						<p>Fines levied to protect Green Belt land from degradation.</p> <p>High level Green Belt sites should only be considered if the current use is not viable.</p>
25.	<p><b>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?</b></p>	<p>Yes – Sevenoaks Town Council advises that this should be done by local authorities, not landowners/developers.</p>		<p>Yes.</p> <p>Guidance should be focussed on the 5 purposes and wider sustainability and protecting habitats.</p> <p>Strategic reporting with cross-boundary implications of individual Green Belt parcels to be carried out with relevant LPAs together.</p>		<p>Yes.</p> <p>Independent reporting done by local authorities rather than developers or promoters of the land.</p>

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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.		<p>Yes.</p> <p>Grading contribution for the purposes of release based on limited contribution encouraged.</p> <p>Importance of prioritising existing sustainable transport, other community infrastructure, schools, health centres, and have environmental assessment.</p> <p>Land released should designate Local Green Space for local amenity and wildlife for the public good.</p>		<p>Yes. We would like to see the sustainability criteria is fully met, that the environmental considerations including pollution and how good the land is for the public are fully considered in terms of how valuable Green Belt land is.</p> <p>The visibility also would be a factor in the contribution of that Green Belt land and there should be a limit on how far reaching views of that site are in terms of value</p>

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						weight of the Green Belt.
27.	<b>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?</b>	Yes – Sevenoaks Town Council supports the idea of Local Nature Recovery Strategies, and would encourage their use in particular at locations where the Green Belt forms the boundary between distinct communities or parishes/towns and is degraded. They could be used to recover vulnerable parcels of open space which separate communities and whose loss would cause town and parish boundaries to be merged and lost without an adequate recovery strategy.		<p>Yes. CPRE welcome LNRS to ensure green corridors are created or maintained.</p> <p>Encouraged address of developer proposers offsetting the loss of biodiversity at a remote location.</p> <p>CPRE calling (separately) for an integrated land use strategy and see importance to considering LNRS's strategically and a joined-up approach with other policies e.g. Green Belt.</p> <p>CPRE is concerned regarding preservation of unbuilt land for nature recovery.</p>		<p>Yes, we support Local Nature Recovery Strategies.</p> <p>We would like to see the criteria of offsetting the biodiversity only available in a remote location if there is no danger of harm in the area in which the Green Belt is released and functioning. This should be strict when there are factors such as pollution to consider.</p>
28.	<b>Do you agree that our</b>	Yes.		Yes. CPRE wants to see new targets for brownfield development.	No. The grey belt definition	Yes and no. We agree that the

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	<p><b>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?</b></p>			<p>1<sup>st</sup> brownfield land, then grey belt land.</p> <p>Concerns current wording pressures the release of non-grey belt to meeting housing targets. Proposed paragraph 142 wording around ‘only where there are exceptional circumstances’, raises concerns that recreation land, productive land and valuable nature habitats will be released for development, even when this land performs well against the five Green Belt purposes. They would like to see the proposal to develop “higher performing Green Belt” be removed from para 152b.</p>	<p>proposed does not necessarily support development in sustainable locations. often the land as defined will be on the edge of settlements with little or no public transport options. A focus on brownfield land in sustainable locations is much more effective, however this could be undermined by developers wanting to develop grey belt land which may be considered easier to develop and of greater potential value.</p>	<p>order of release of land is in the right order with brownfield first, grey belt and then Green Belt and we would like to see more protection on the strongly performing Green Belt.</p> <p>We also believe the sustainable location factors are very important to be included as a consideration.</p>

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29.	<b>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?</b>	Yes.		<p>Yes. Agreed if function of Green Belt is not undermined and innovative proposals for enhancing the Green Belt rather than releasing land for development be available.</p> <p>Clarity around what ‘fundamentally undermining the function of the Green Belt across the plan area’ means.</p> <p>Proposed wording changed to recognise the impact of releasing a site on the immediate surrounding area instead of the entire Green Belt.</p> <p>Where Green Belt sites perform well against the five purposes they should be kept and protected by policy.</p>		Yes. We would like to see more incentive to consider the implications of the wider picture of the local authority might be in terms of blueprint and how that may be managed.
30.	<b>Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?</b>	Yes, Sevenoaks Town Council agrees with this approach, provided affordable housing and infrastructure is secured, as this system only achieves acceptable benefits when a high proportion of affordable housing is delivered through it. The Town Council also		<p>No. Strongly disagree that the NPPF should facilitate strategic review of the Green Belt during local plan updates. Grey belt to be identified via the Local Plan is a risk that may encourage speculative applications and highlighting the resource issues this would cause.</p> <p>Strongly object and states the NPPF should not undermine the local plan process.</p>		No, we don’t agree this should be possible due to the risks of speculative planning applications.

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		advises that development on the Green Belt must be plan-led.		<p>No need when genuine “very special circumstances” can be exercised. Feel that the new option for developers to label “grey belt” complicates this process.</p> <p>Understand the local plans are best dealt with promptly.</p>		
31.	<b>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?</b>	Sevenoaks Town Council advises that there needs to be a clear and unambiguous stipulations for developers to be required to provide affordable housing and infrastructure. Commercial activities must demonstrate that they will do no external harm to the Green Belt and are sustainable – for instance that they will not cause any pollution to the surrounding area via watercourses etcetera.		<p>Yes. CPRE make it clear their planning experience is not to oppose the local plans and acknowledges it is based on environmental, sustainability appraisal and local consultation. It is a democratic process.</p> <p>Remove Paragraph 152 wording should be removed as it is too broad in potential.</p>		The POGBT are not trying to delay the Local Plan, just ensure the precedent and blueprint are sound.
32.	<b>Do you have views on whether the</b>	Yes – Sevenoaks Town Council advises that there is vast unmet		Travellers’ sites to be equally treated as residential sites through a local needs		



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	<p><b>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?</b></p>	<p>traveller site need, and recommends that adequate provision should be allocated via local plans – including facilities.</p>		<p>assessment with focus on alternative land.</p>		
33.	<p><b>Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?</b></p>	<p>Yes, - provision need for traveller sites should not be excluded from the approach and should be actively provided for.</p>		<p>As above.</p>		

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34.	<b>Do you agree with our proposed approach to the affordable housing tenure mix?</b>	Sevenoaks Town Council advises that clarification is needed as to what proportion would be social rent, what the definition of “major” is, and finally that 50% affordable housing should be a requirement – not a target.		Yes. More detailed proposal required to clarify what the evidential basis for the 50% target on ‘grey belt’ land is.  Target should be applied equally across rural England, as affordable housing is not just required within Green Belt.		Yes. The “subject to viability” needs to be clear and not a release from obligation. It is not acceptable to have a target and no guaranteed level of affordable housing.
35.	<b>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</b>	Answer choices: The 50% target should apply to all Green Belt areas (including previously developed land in the Green Belt)  or  The Government or local planning authorities should be able to set lower targets in low land value areas.		No. Targets should be prescriptive and be a ‘minimum benchmark’ for affordable housing.	Yes. The 50% target should apply to all Green Belt areas (including previously developed land in the Green Belt  It is essential that the 50% affordable housing requirement is set as a non-negotiable	Yes, the Green Belt release should be dependent on affordable housing being guaranteed and viability considered fully at the outset.

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	low land value areas?	50% target option chosen.			‘golden rule’ for release of land from the greenbelt. If this requirement is allowed to vary according to ‘viability’ as suggested, it is unlikely that it will ever be achieved anywhere. We know that greenbelt sites are likely to require more infrastructure investment, and therefore it will be a challenge to meet these costs and achieve 50% affordable housing, however this challenge will help to bring forward only the most sustainable and achievable	

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					locations, and also to incentivise brownfield first.	
36.	<b>Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?</b>	Yes.		Yes. Green belt to be avoided and brownfield first with delivery of improvements to nature and public access.		Yes. All developments should be obliged to provide benefits for nature and public.
37.	<b>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</b>	Yes. Sevenoaks Town Council advises that this only works with compulsory purchase and purchases which are moving forwards, as it could lead to landbanking where land owners don't develop their land as they prefer to wait until its value increases. Compulsory purchase orders are		No. Clarity required about 'grey belt' sites in relation to Benchmark Land Value (BLV) and how this works if allowance remains for an 'appropriate premium for landowners'. How and who determined?	Yes. The primary purpose of any release of land from the greenbelt should be to facilitate delivery of the homes that are needed, and not to provide super profits to landowners and developers. The residual value of	Yes but with more definition and clarity regarding sustainability, infrastructure and biodiversity and clarity required around how disproportionate premiums to landowners in

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	<b>authority policy development?</b>	therefore needed to support this.			land must include the presumption for 50% affordable housing plus the costs for infrastructure and biodiversity net gain. If benchmark land values are not set, quality, sustainability, infrastructure, and affordable housing will be lost due to increased land value expectations. Unrealistic land value expectations are likely to slow down the delivery of homes due to land banking.	favour of affordable housing needs to be addressed to facilitate viability.
38.	<b>How and at what level</b>	Sevenoaks Town Council advises that this				

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	should Government set benchmark land values?	must be assessed regionally and with a localised measure of values that will permit the golden rules to be implemented for development of affordable housing.				
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	Yes, Sevenoaks Town Council supports this in principle.			Yes. The golden rules should be seen as minimum requirements, with little or no scope for negotiation. the more uncertainty or scope for negotiation possible will slow down the planning and delivery process.	Yes.

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	views on this approach?					
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?	Yes, Sevenoaks Town Council considers that this should apply to draft Local Plans.				
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	No, Sevenoaks Town Council advises that trying to unpick these types of negotiations could introduce more uncertainty and delay development.				

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	further contributions are required? What support would local planning authorities require to use these effectively?					
42.	<b>Do you have a view on how golden rules might apply to non-residential development, including commercial development, traveller's sites and types of development already considered 'not inappropriate' in the Green Belt?</b>	Yes – Sevenoaks Town Council considers that there should be community benefits for non-residential development including infrastructure and access improvements.			Yes. Golden rules should set a high-level expectation for development in the greenbelt in terms of its quality and sustainability and justification no matter what the proposed development is for. It is critical that greenbelt release is not seen as the easy option for any development type and should only be	Yes. Community benefits and the Golden rules should be categorically met.



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					considered in exceptional circumstances.	
43.	<b>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?</b>	Yes, Sevenoaks Town Council considers that this should apply to draft Local Plans.		Yes. As delay will occur.	Yes. If Government propose a radical approach to greenbelt review as set out, it is essential that it must be a clear and level playing field and apply to all proposals and plans irrespective of what current stage they are at. Greenbelt sties may take many years to come forward, and community expectations and understanding should be clear and not clouded by emerging schemes that may not follow rules because	Yes.

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					they were briefly ahead in the planning process today.	
44.	<b>Do you have any comments on the proposed wording for the NPPF (Annex 4)?</b>	No comment.		Important to deliver affordable homes and other infrastructure.		
45.	<b>Do you have any comments on the proposed approach set out in paragraphs 31 and 32?</b>	Yes – Sevenoaks Town Council advises that the proposed approach should not be a blanket policy, and should require support of a Local or Neighbourhood Plan. It should therefore follow on either from Local Plans having evaluated the Green Belt site for allocation as Grey Belt, or from having been identified in the Neighbourhood Development Plan for potential housing. In addition, Sevenoaks				

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		Town Council considers that this would also be a valuable approach for securing development outside of Green Belt land as well, and would therefore be in favour of expanding its use to sites within urban areas which already have planning permission but which have remained undelivered and the land undeveloped for long periods of time.				
46.	<b>Do you have any other suggestions relating to the proposals in this chapter?</b>	Sevenoaks Town Council's experience is that delivery of these different services and infrastructures – in particular GP Surgeries – is poorly coordinated, and the ability to engage NHS services in this process is especially difficult. The Town Council therefore advises that developer contributions towards such infrastructure			Yes. The tools to require brownfield first much be much clearer to ensure that greenbelt release is seen as a last resort rather than a first port of call. Developer and landowner profit from green belt release could offer	We would like to see guarantees for the long term and developer contributions that satisfy all local needs rather than be of huge benefit to the developer/land owner.

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		need to be kept in the area and conditioned to be used appropriately within that area – as opposed to being given to a larger body which may use the contributions as they choose.			extraordinary gains unless this process is managed correctly, and a genuine reinforcement of brownfield and gentle densification first approaches are developed.	
47.	<b>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</b>	Yes – Sevenoaks Town Council considers that local planning authorities should explicitly consider those requiring social rent as well as the vast range of different needs within this, with social housing needing to remain a mix so as to meet the specific needs of that area.				Yes. We would like to see a reliable needs assessment

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	housing requirements?					
48.	<b>Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?</b>	Yes – however Sevenoaks Town Council advises that the affordable element should be retained at 50%. The 10% requirement doesn't allow flexibility to meet the needs of the local community, and the mix of affordable housing should be prescribed at a local level – while meeting the 40/50% affordable housing provision requirement.		No.  target should remain as a baseline which local authorities can exceed with social housing considered.		No. This should always remain. In fact, we believe this 10% is too low. Needs should be a priority and, when there is green belt release more so.
49.	<b>Do you agree with removing the minimum 25% First Homes requirement?</b>	Yes – but the affordable element should be retained at 50%. The 25% doesn't allow flexibility to meet the needs of the local community, and the mix of affordable housing should be prescribed at a local level – while meeting the 40/50%		Yes.		Yes.

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		affordable housing provision requirement.				
50.	<b>Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?</b>	No comment.		minimum amounts of 25% affordable housing would help local authorities ensure delivery with 75% for social and market rent.		
51.	<b>Do you agree with introducing a policy to promote developments that have a mix of tenures and types?</b>	Yes – particularly for larger sites where there is flexibility to meet a larger range of tenures, with the priority being to ensure that the housing needs of different cohort groups are met.		Yes.		Yes.
52.	<b>What would be the most appropriate way to promote high percentage Social Rent/affordable</b>	Sevenoaks Town Council considers that Government grants and support is needed, given the high land and building costs. This must be taken seriously at government level				

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	housing developments?	and budget set for affordability.				
53.	<p><b>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?</b></p>	<p>Sevenoaks Town Council considers excellence of design to be highly important, with priority of high-quality builds, density, housing mix, landscaping, accessibility, public transport, and interconnectivity with the community that these developments are set in. Public transport must include links to employment and proximity to education.</p> <p>The Town Council considers maximum size to be less relevant compared to the quality of Masterplanning and design to ensure that the new community is well connected to its environment.</p>				

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		<p>In addition and most importantly – housing must be designed to be indistinguishable from non-social rent and integrate the different types of housing together. A robust maintenance programme for communal areas must be considered as part of the planning permission in order to ensure that the façade and appearance of the buildings are maintained.</p>				
54.	<p><b>What measures should we consider to better support and increase rural affordable housing?</b></p>	<p>There is currently little allowance in current Local Plans for new housing near old villages, which causes them to diminish. District and principle authorities should be required to make provisions for rural as well as major developments in their</p>				



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		<p>Local Plans, with explicit requirement to keep urban settlements economically sustainable.</p> <p>Transport links are imperative, with links to employment and proximity to education needed to keep the community sustainable. Designs should be consistent with the scale of the rural setting, in order to integrate the development into the existing community.</p>				
55.	<b>Do you agree with the changes proposed to paragraph 63 of the existing NPPF?</b>	Yes.		Yes.		
56.	<b>Do you agree with these changes?</b>	Yes. Sevenoaks Town Council is supportive of this and would recommend that		Yes.		

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		Parish/Town Councils be included in the definition of community-based groups.				
57.	<b>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?</b>	Yes – Sevenoaks Town Council supports amendments to make it easier for organisations that are not Registered Providers to include community-led developments.		Yes.		
58.	<b>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?</b>	Sevenoaks Town Council considers that the key reason as to why insufficient small sites are being allocated is that Local Plans currently rely on landowners to put forwards their sites, as opposed to the Local Planning Authority or		Yes.		

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		<p>community group being able to identify it themselves. It requires the landowner's permission, as opposed to in Neighbourhood Development Plans which can identify potential development sites without necessarily requiring permission from the landowner. Sevenoaks Town Council therefore recommends that (1) incentives be introduced for landowners to propose their sites for housing, and (2) that the ability for principle and planning authorities, as well as local community groups to suggest sites as in the Neighbourhood Planning process be extended to the Local Plan process.</p>				

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		<p>In addition, the Town Council considers that compulsory purchase orders and external fair valuations should apply to small sites that cannot be unlocked through the private sector, in order to give councils ability to compel the issue on the basis of a fair valuation.</p> <p>With regards to section 16c (whether a definition distinguishing between small and medium sites would improve clarity):  Sevenoaks Town Council agrees that small sites are defined too broadly, and that there should be distinction between small and medium sites.  Finally, Sevenoaks Town Council agrees with the suggestion in section 16d that authority-</p>				

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		specific small-site strategies would help implement the 10% small site allocation requirement.				
59.	<b>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?</b>	Yes – Sevenoaks Town Council considers that Local Planning Authorities should be required to have a local design guide and design codes.		No. focus on design quality as previously. Categorized as ‘mediocre’ or ‘poor’ with poor design quality being a particular issue in rural areas.		
60.	<b>Do you agree with proposed changes to policy for upwards extensions?</b>	Yes, however not in Conservation Areas or where it conflicts with local design guides.		Yes.		
61.	<b>Do you have any other suggestions</b>	No comment.		No.		

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	relating to the proposals in this chapter?					
62.	<b>Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?</b>	<p>Yes. Sevenoaks Town Council urges that delivery of these commercial developments must be carbon neutral.</p> <p>In addition, coordination with other bodies which could utilise the byproduct of each other's assets should be part of the approval process – for instance such as data centres which produce a large amount of heat could coordinate with those that can generate power from heat.</p>				
63.	<b>Are there other sectors you think need particular support via these changes?</b>	Sevenoaks Town Council considers that water and sewerage should also be considered.		No comment.		

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	What are they and why?					
64.	<b>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?</b>	Yes – Sevenoaks Town Council supports this, however with the strong stipulation that this should only be allowed at the direct request of the local principle authority.		No comment  CPRE local: Yes, more clearly defined.		
65.	<b>If the direction power is extended to these developments, should it be limited by scale, and what would be an</b>	Sevenoaks Town Council urges that this must not encroach into the Green Belt or negatively impact existing communities.		No comment.		

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	appropriate scale if so?					
66.	Do you have any other suggestions relating to the proposals in this chapter?	No comment.		No.		
67.	Do you agree with the changes proposed to paragraph 100 of the existing NPPF?	Yes Sevenoaks Town Council strongly supports this.		Yes.		Yes. Infrastructure and other facilities are very important.
68.	Do you agree with the changes proposed to paragraph 99 of the existing NPPF?	Yes Sevenoaks Town Council strongly supports this.		Yes.		Yes.
69.	Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?	Sevenoaks Town Council would strongly agree with this and advises that a key vision to lead change in the transport system is to prioritise planning developments to be		Yes.		Yes. The sustainable transport must be within less distance of any new development than the



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		well-connected with public transport options, local retail hubs, cycling and walking infrastructure in order to create 15 minute cities. This will need significant initial investment, however improvements to the public transport and highway network would improve productivity and lead to income generation which would eventually offset this.				distance that may impact other surrounding areas negatively. There should be a limit as to how much add on there can be to consider a development to be well-connected.
70.	<b>How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?</b>	Sevenoaks Town Council recommends that Local Plans should set measurable targets for walking, cycling and other active travel, and make the infrastructure easy to deliver and provide choices which enable people to help achieve these targets.		Walking and cycling infrastructure as a basic requirement for healthier lifestyles and future lower carbon travel.		

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71.	<b>Do you have any other suggestions relating to the proposals in this chapter?</b>	Sevenoaks Town Council recommended that consideration be put into a mandate which would require provision of suitable exercise and recreation spaces from larger developments. These should be accessible to all and could include outdoor play spaces and gyms.		Yes – Car-free development		Developments must be sustainable.
72.	<b>Do you agree that large onshore wind projects should be reintegrated into the s NSIP regime?</b>	Yes.		Address climate emergency Concerns with this proposal		
73.	<b>Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?</b>	Yes. Sevenoaks Town Council agrees with the changes to give greater support to wind energy production, however considers that solar energy proposals should focus on utilising built or tarmacked land as a first priority – for		Yes, renewable energy schemes, however, other methods for reducing energy consumption/demand should also be considered		Solar panels should only be built on roofs of car parks and other initiatives that do not degrade Green Belt land.

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		instance by covering multi-storey car parks and installing solar panels on the roofs.				
74.	<b>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 compensatory mechanisms put in place?</b>	Yes – Sevenoaks Town Council recommended that water management and flood prevention also be included.		Peat is irreplaceable habitat. Follow Natural England standing advice		We concur with Natural England and would like to see prohibition of peat development. We would like to see new development in sustainable locations and the protection of habitats and farmland with priority. We would also like to see flood prevention and water management included in the considerations.
75.	<b>Do you agree that the threshold at</b>	Yes.		More input on questions would be appreciated.		

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	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?					
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?	Yes, however Solar proposals should focus and prioritise utilising built or tarmacked land, for instance by covering multi-storey car parks and installing solar panels on the roofs.				

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77.	If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?	Sevenoaks Town Council recommended that this should be kept under review as the technology advances.				
78.	In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?	<p>Sevenoaks Town Council considers that BREEAM should be a standard as opposed to a best practice, with all new buildings required to be as energy efficient as possible and high standards set for how sustainable a development has to be.</p> <p>The Town Council also recommends that retrofitting should be made easier under the planning system, in order to encourage more solar panel installations, better insulation and water</p>				

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		<p>recycling.</p> <p>In addition, there is currently no law to prevent houses directing their surface water run-off to sewers, which must be addressed. This is a particular issue in Sevenoaks, with sewers regularly overflowing during heavy rainfall due to householders having installed new driveways and connecting the surface water run-off to sewer drains. National planning policy should restrict such practice and surface water run-off instead be redirected to SUD systems that feed aquifers.</p> <p>Sevenoaks Town Council also recommends that the</p>				

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		<p>exemptions which absolve particular development types from being required to deliver 10% Biodiversity Net Gain should be revoked or limited – particularly for self-build and householder applications.</p> <p>Finally, the Town Council recommends that new developments should be required to be linked with public transport networks to encourage transport modes outside of private car use to be utilised.</p>				
79.	<b>What is your view of the current state of technological readiness and availability of tools for accurate carbon</b>	No comment.		The level of carbon emitted from new development is not well understood. CPRE would like to see best available techniques incorporated in new developments		

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	accounting in plan-making and planning decisions, and what are the challenges to increasing its use?					
80.	<b>Are any changes needed to policy for managing flood risk to improve its effectiveness?</b>	<p>Sevenoaks Town Council advises that rain water management needs to be significantly rethought, as there is currently no law to prevent houses directing their surface water run-off to sewers, which the Town Council has witnessed the detrimental effects of.</p> <p>There is urgent need to ensure that no additional load is placed on the existing rainwater and sewer systems. Sevenoaks Town Council recommends that applicants should be</p>		flood risk assessment including surface water drainage		



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		<p>required to prove that development won't overload the existing sewer system, with enforcement for those that connect rainwater run-off to the sewer system.</p> <p>The Town Council also recommends that there should be better infrastructure of SUDs and water retention measures, with all major schemes being required to show how they will retain water and ensure that run-off is dealt with other than via the sewer system.</p>				
81.	<p><b>Do you have any other comments on actions that can be taken through planning to address climate change?</b></p>	<p>No comment.</p>		<p>Please refer to CPRE's adopted policy on climate change - <a href="https://www.cpre.org.uk/resources/cpre-climate-emergency-policy-and-supporting-topic-papers/">https://www.cpre.org.uk/resources/cpre-climate-emergency-policy-and-supporting-topic-papers/</a></p>		

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82.	<b>Do you agree with removal of this text from the footnote?</b>	No. Sevenoaks Town Council considers that this text is needed to keep agricultural land viable, as the green benefit of locally produced food is important.				No, we do not agree with the removal of the footnote as we would like to see the agricultural land preserved for locally produced food so as not to rely on imports. The preservation of that land is important to ensure protection from climate change. Importantly solar farms are not to be built on agricultural land. We encourage the facilitation of roof top solar panels and those over car

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						parks to maximise agricultural land for food. We support energy development in the most sustainable way.
83.	<b>Are there other ways in which we can ensure that development supports and does not compromise food production?</b>	It is Sevenoaks Town Council's view that development and solar generation should in the first instance be developed on existing brownfields and developed land, and agricultural land should be safeguarded via policy. Allotments should also be protected as part of the planning process.				
84.	<b>Do you agree that we should improve the current water infrastructure provisions in</b>	Yes.		Yes,		

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	the Planning Act 2008, and do you have specific suggestions for how best to do this?					
85.	<b>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?</b>	<p>Sevenoaks Town Council agrees that water should be thought of as a strategic planning project, and recommends that it be localised to make it a more prominent issue so that communities are encouraged and supported in managing water resources better.</p> <p>Sevenoaks Town Council recommends that rainwater collection for re-use by households should be encouraged and that this, as well as prioritisation of grey water recycling systems should be a default for</p>				

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		<p>large scale developments in order to reduce consumption.</p> <p>Finally, Sevenoaks Town Council recommends that rainwater should be redirected to aquifers, not sewers. Rainwater is easily cleaned and doing this via sewers is a waste of resources and causes the system to be overloaded and causes flooding.</p>				
86.	<p><b>Do you have any other suggestions relating to the proposals in this chapter?</b></p>	<p>Sevenoaks Town Council recommends that there should be a greater degree of localism to encourage local involvement, and that design should prioritise rainwater retention and grey water recycling. There needs to be more thought of how a particular development relates to the network.</p>				

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87.	<b>Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?</b>	Yes, Sevenoaks Town Council agrees that this is appropriate where authorities have not attempted to deliver a plan. However, in instances where the draft Local Plan has been created but failed to pass examination, Local Planning Authorities should be supported in completing it. The Local Plan process is significantly time consuming, with Plans that have failed to pass examination having then been completely discarded and the process set back to the beginning. Sevenoaks Town Council recommends that Local Planning Authorities should instead be able to negotiate and amend the Plan, as opposed to having to start afresh,				

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		and that the process furthermore needs to be shortened and simplified in order to keep the local community effectively engaged with the contents.				
88.	<b>Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?</b>	No.		Not relevant to the work of CPRE.		
89.	<b>Do you agree with the proposal to increase householder application fees to meet cost recovery?</b>	Yes – however, Sevenoaks Town Council considers that householder application fees should be varied and differential according to area, as well as complexity, size of the proposals and amount of Officer time				Fees should be set proportionally to the size and complexity of the proposal.

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		to consider the plans. Rather than a flat fee, there should be a maximum charge that can be applied, with Local Planning Authorities granted authority to agree their own tariff, with the expectation that any fees should meet the full costs and be self-financing and the caveat that they should not generate a profit.				
90.	<b>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</b>	Sevenoaks Town Council recommends that Local Planning Authorities should be able to agree their own tariffs with the expectation that any fees should meet full costs and be self-financing and not profiting. There should, however, be a maximum cap, with costs differentiated according to type of		No response.		No comment.



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	<p>fee would increase the application fee from £258 to £387.</p> <p>If Yes, please explain in the text box what you consider an appropriate fee increase would be.</p>	<p>application to account for smaller applications that will take less Officer time to evaluate.</p>				
91.	<p>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?</p> <p>Yes</p>	<p>Sevenoaks Town Council recommends that Local Planning Authorities should be able to agree their own tariffs with the expectation that any fees should meet full costs and be self-financing and not profiting. There should, however, be a maximum cap, with costs differentiated according to type of application to account for smaller applications</p>		<p>No response.</p>		<p>No expertise in this area.</p>

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	<p>No – it should be higher than £528</p> <p>No – it should be lower than £528</p> <p>No - there should be no fee increase</p> <p>Don't know</p> <p>If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.</p>	<p>that will take less Officer time to evaluate.</p>				
92.	<p>Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you</p>	<p>Sevenoaks Town Council recommends that Local Planning Authorities should be able to agree own tariff with the expectation that any fees should meet full costs and be self-financing and not profiting. There should,</p>		<p>No response.</p>		

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	consider the correct fee should be.	however, be a maximum cap, with costs differentiated according to type of application to account for smaller applications that will take less Officer time to evaluate.				
93.	<b>Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.</b>	Explain with what thoughts are on the correct fee.		No response.		
94.	<b>Do you consider that each local planning authority should be able</b>	Yes.		No response.		

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	<p>to set its own (non-profit making) planning application fee? Please give your reasons in the text box below.</p>					
95.	<p><b>What would be your preferred model for localisation of planning fees?</b>  <b>Full Localisation – Placing a mandatory duty on all local planning authorities to set their own fee.</b>  <b>Local Variation – Maintain a nationally-set default fee and giving local planning</b></p>	<p>Full localisation – subject to maximum caps.</p>		<p>No response.</p>		

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	<p>authorities the option to set all or some fees locally. Neither Don't Know Please give your reasons in the text box below.</p>					
96.	<p>Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services? If yes, please explain what you consider an appropriate increase would be and whether this should</p>	No.		No response.		

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	apply to all applications or, for example, just applications for major development?					
97.	What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?	No response.		No response.		No response.
98.	Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for	No - not at this stage.		No response.		

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	development consent orders under the Planning Act 2008, payable by applicants, should be introduced?					
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	No response.		No response.		No response.

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	to waive fees where planning performance agreements are made.					
100.	What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?	Sevenoaks Town Council recommends that there should be caps to this.		No response.		No response.
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					



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	evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.					
102.	Do you have any other suggestions relating to the proposals in this chapter?	No.		No response.		
103.	Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?	Yes, however Sevenoaks Town Council recommends that, where the local authority is over 200 units short or not yet at Regulation 19 stage, additional weight should be given to made Neighbourhood Development Plans in order to mitigate the tilted balance from the		Yes.		

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		<p>presumption in favour of sustainable development.</p> <p>The Town Council has a current Neighbourhood Plan which identifies 13 large sites for potential housing, however continues to be subject to the presumption which has caused a number of inappropriate developments to be Granted at Appeal.</p> <p>The Town Council considers that Towns and Parishes that have put significant time, work and funding into the production of these documents should not be subject to the presumption which can undermine the Policies and design guidance within them.</p>				
104.	Do you agree with the proposed	No response.		Yes.		

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	transitional arrangements?					
105.	Do you have any other suggestions relating to the proposals in this chapter?	No.		No.		
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	No Comment.		CPRE refers to its EDI Statement.		

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	and how. Is there anything that could be done to mitigate any impact identified?					