

Minutes of the Sevenoaks Town Council PLANNING & ENVIRONMENT COMMITTEE meeting held on Monday 9th September 2024 at 7:00pm at the Town Council Chambers. Livestreamed and available on YouTube until Minutes are accepted by Town Council Meeting:

https://youtube.com/live/9X_CZn3uXAw

Present:

Committee Members

Quorum minimum of six members

Cllr Ancrum – Mayor	Apologies	Cllr Layne	Present
Cllr Camp – Chair	Apologies	Cllr Michaelides	Present
Cllr Dr Canet	Present	Cllr O’Hara	Apologies
Cllr Clayton	Present	Cllr Shea	Present
Cllr Daniell – Deputy Leader	Present	Cllr Skinner OBE – Vice Chair	Apologies
Cllr Dr Dixon	Present	Cllr Varley	Present
Cllr Granville	Apologies	Cllr Willis	Apologies
Cllr Gustard	Apologies	Cllr Wightman – Leader	Apologies

Also in attendance:

Town Clerk

Planning Committee Clerk

Prior to the commencement of the meeting and in the absence of the Chair or Vice Chair, Cllr Tony Clayton as Deputy Mayor of the Town Council was nominated to Chair the meeting.

PUBLIC QUESTION TIME

None.

296 **REQUESTS FOR DISPENSATIONS**

No requests for dispensations had been received.

297 **DECLARATIONS OF INTEREST**

None.

298 **MINUTES**

The Committee received the MINUTES of the Planning Committee Meeting held 27th August 2024.

It was RESOLVED that the minutes be approved.

299 **STREET NAMING AND NUMBERING**

The Committee noted the creation of three new addresses relating to the following development site:

- **Development behind and above what was The Hardware Centre, 36-41 London Road**

300 HAS MAD DOCUMENTS FOR AMENDMENT 7: A SPEED LIMIT ON VARIOUS ROADS, SEVENOAKS IN THE DISTRICT OF SEVENOAKS

a) The Committee received and noted documents on deposit from Kent County Council (KCC), announcing that it has officially made the above Order to reduce the speed limit to 20mph on various roads in Sevenoaks Town. It was noted that this had previously been advertised as Amendment 34.

b) Cllr Clayton noted that the following roads were incorrectly shown in the plans as having 30mph signs leading into them, as well as a number of repeater signs having been erected in locations where they were obscured by hedges or other traffic furniture:

- Nursery Close – not included in the original plans
- Wildernes Avenue – private
- Emily Jackson – private
- Akehurst Lane – private

c) The Planning Committee Clerk advised that Town Council Officers had visited each of the above roads, confirming that none of them had received the signage indicated in the plans, and raising the issue to KCC to ensure that they wouldn't be erected at a later date. KCC had confirmed that they would not be erecting signs at the locations – including at Nursery Close which is not privately owned.

d) It was **RESOLVED** that Cllrs forward any further issues to the Planning Committee Clerk for collating monitoring, and reporting to KCC if unresolved during any upcoming additional works.

e) Cllr Shea advised that the East-West Walking, Wheeling and Cycling route, which interacts with some of the 20mph roads – is estimated for delivery by October/November 2024. This as per recent update that she had received from Sevenoaks District Council.

301 CONSULTATION ON PROPOSED REVISIONS TO THE NATIONAL PLANNING POLICY FRAMEWORK AND PLANNING SYSTEM

a) The Committee received and noted an initial draft response to the Ministry of Housing, Communities and Local Government's consultation on proposed changes to the National Planning Policy Framework. This as prepared by a Working Group comprising Cllr Shea, Cllr Wightman, Cllr Camp and Cllr Clayton. **(See Appendix)**

b) It was noted that the remainder of the Town Council's draft response would be presented for approval of the Planning & Environment Committee on 23rd September 2024.

c) Councillors were encouraged to forward any comments on the draft responses so far, or suggested responses to questions which had not yet been considered. These would be considered by the Working Group when it next meets on Thursday 12th September.

302 SEVENOAKS DISTRICT COUNCIL CONSULTATION ON PROPOSED NEW BUSINESS PARK

a) The Committee received notice that Sevenoaks District Council (SDC) is consulting on its early ideas for a small business park on Otford Road to replace its waste bin storage site. This to include four small industrial units and a drive through café.

b) Cllr Shea advised of the following information that she had received from SDC Officers:

- The site has been assessed as unsuitable for housing due to contamination of the land and flood risk.
- Relocation of the bin storage had not yet been confirmed
- Need for the proposed use had been identified by consultants following a market study which identified demand for small light industrial units for start-up businesses, and the District Council had received various enquiries from businesses about hosting a drive through café.
- The proposals were understood to be at an advanced stage, with SDC having already approved a process for borrowing funds to deliver the scheme

c) Councillors expressed concern about the impact of contamination and flood risk on the café and industrial units, and it was agreed that the Town Council should raise that in its upcoming response.

d) It was **RESOLVED** that a draft response be prepared following the exhibition on 14th September 2024, so as to be informed by information received from SDC Officers as well as comments from the public in attendance. Councillors were encouraged to attend if able to, and to provide comments for consideration and agreement of the Planning & Environment Committee on 23rd September 2024.

303 SEVENOAKS DISTRICT COUNCIL CONSULTATION ON PLANNING VALIDATION CHECKLIST

a) The Committee received and noted the Town Council's response to the District Council's consultation on proposed changes to its planning validation requirements. This as agreed at the Town Council meeting on 2nd September 2024 and prepared by Cllr Clayton, Cllr Shea and Cllr Wightman.

b) It was noted that the District Council's Development Management team had recently agreed to add more detailed descriptions to Minor Material Amendments applications to indicate what the changes were. The Town Clerk recommended that this request be added to the Town Council's response for completeness, and the Councillors further requested that descriptions be more detailed as to their contents. For instance, to clarify what "Changes to fenestration" are proposed.

c) It was **RESOLVED** that the Planning Committee Clerk forward the additional responses as outlined above to the District Council's Validation team.

304 PLANNING APPLICATIONS

(a) No members of the public registered to speak on individual applications.

(b) The Committee considered planning applications received during the two weeks ending 2nd September 2024. **It was RESOLVED** that the comments listed on the attached schedule be forwarded to Sevenoaks District Council.

305 PRESS RELEASES

None.

There being no further business the Chair closed the meeting at 8:30pm.

Signed
Chair

Dated

Planning Applications Considered

Applications considered on 9-9-24

1	<i>Plan Number</i>	<i>Planning officer</i>	<i>Town Councillor</i>	<i>Agent</i>
	24/00040/HOUSE	Summer Aucoin 23/09/2024	Cllr Michaelides	N/A
<i>Applicant</i>	<i>House Name</i>	<i>Road</i>	<i>Locality</i>	
Mrs T Martin		25 The Drive	Town	
<i>Town</i>	<i>County</i>	<i>Post Code</i>	<i>Application date</i>	
			02/09/24	
Convert the loft space into habitable space with 3no dormers to the front, side and rear elevations. Alterations to fenestrations including new double glazed bays to the front, small upstairs window to front and side, plus barge boards, soffits and fascia and guttering throughout.				

Comment

Sevenoaks Town Council recommended refusal, unless the Planning Officer is satisfied there will be no loss of amenity or privacy to No.27 via overlooking, and unless the Conservation Officer is satisfied that there won't be a negative impact on the Conservation Area.

2	<i>Plan Number</i>	<i>Planning officer</i>	<i>Town Councillor</i>	<i>Agent</i>
	24/00736/HOUSE	Abbey Aslett 13/09/2024	Cllr Layne	Fuller Long Limited
<i>Applicant</i>	<i>House Name</i>	<i>Road</i>	<i>Locality</i>	
Mr & Mrs Herron		3 Park Lane	Eastern	
<i>Town</i>	<i>County</i>	<i>Post Code</i>	<i>Application date</i>	
			22/08/24	

24/00736/HOUSE - Amended plan

Replacement of windows to double glazing (like for like), new picket fence to the front and new porch. Conversion of garage to a habitable room and associated alterations to the fenestration, replacement of glass roof between the study and dining room with a new flat roof and lantern light external insulation, reinstatement of existing cladding, chimneys to be repaired, addition of a curb. . Landscaping works.

A summary of the main changes is set out below:

References to insulation under cladding removed.

Comment

Sevenoaks Town Council recommended approval, providing the Planning Officer and Conservation Officer are satisfied with the changes.

Planning Applications Considered

Applications considered on 9-9-24

3	<i>Plan Number</i>	<i>Planning officer</i>	<i>Town Councillor</i>	<i>Agent</i>
	24/00737/LBCALT	Abbey Aslett 13/09/2024	Cllr Layne	Fuller Long Limited
<i>Applicant</i>		<i>House Name</i>	<i>Road</i>	<i>Locality</i>
Mr & Mrs Herron			3 Park Lane	Eastern
<i>Town</i>	<i>County</i>	<i>Post Code</i>	<i>Application date</i>	
			22/08/24	

24/00737/LBCALT - Amended plan

Replacement of windows to double glazing (like for like), new picket fence to the front and new porch. Conversion of garage to a habitable room and associated alterations to the fenestration, replacement of glass roof between the study and dining room with a new flat roof and lantern light external insulation, reinstatement of existing cladding, chimneys to be repaired, addition of a curb. Landscaping works. Removal of internal wall between the kitchen and dining room, reciting of internal stud bathroom wall at first floor level, increased width and height of two doorways at first floor level, removal of first floor WC, installation of wall and ceiling insulation. Woodburner.

A summary of the main changes are set out below:

References to insulation under cladding removed.

Comment

Sevenoaks Town Council recommended approval, providing the Planning Officer and Conservation Officer are satisfied with the changes.

4	<i>Plan Number</i>	<i>Planning officer</i>	<i>Town Councillor</i>	<i>Agent</i>
	24/01305/FUL	Abbey Aslett 13/09/2024	Cllr Dr Dixon	NJA Town Planning Ltd
<i>Applicant</i>		<i>House Name</i>	<i>Road</i>	<i>Locality</i>
Mr & Mrs Mclean			5 Mount Harry Road	St Johns
<i>Town</i>	<i>County</i>	<i>Post Code</i>	<i>Application date</i>	
			22/08/24	

24/01305/FUL - Amended plan

Demolition of existing garage, subdivision of land and construction of new dwelling with basement. New access and parking, fencing and associated landscaping.

A summary of the main changes are set out below:

Main changes include corrections to the block plan to show the correct positioning of the house, solar panels included on elevation and updated landscape information.

Comment

Sevenoaks Town Council recommended approval, provided the Conservation Officer is satisfied.

Planning Applications Considered

Applications considered on 9-9-24

5	<i>Plan Number</i>	<i>Planning officer</i>	<i>Town Councillor</i>	<i>Agent</i>
	24/01708/HOUSE	Stephanie Payne 19/09/2024	Cllr Wightman	Robinson Escott Planning
<i>Applicant</i>		<i>House Name</i>	<i>Road</i>	<i>Locality</i>
Mr & Mrs Abson		Site of Little Wood	Woodland Rise	Wilderness
<i>Town</i>		<i>County</i>	<i>Post Code</i>	<i>Application date</i>
				29/08/24

24/01708/HOUSE - Amended plan

Erection of entrance gates and piers.

A summary of the main changes are set out below:

Further arboricultural information on the works have been provided.

Comment

Proposed from the Chair with Cllr Wightman's apologies:

Sevenoaks Town Council recommended approval, subject to:

- The Arboricultural Plan being implemented to the satisfaction of the Tree Officer and
- The Planning Officer being satisfied that there is no encroachment to neighbouring properties.

6	<i>Plan Number</i>	<i>Planning officer</i>	<i>Town Councillor</i>	<i>Agent</i>
	24/01811/LBCALT	Abbey Aslett 23/09/2024	Cllr Graville	TRS Surveying
<i>Applicant</i>		<i>House Name</i>	<i>Road</i>	<i>Locality</i>
Mr J Moir			2 High Street	Town
<i>Town</i>		<i>County</i>	<i>Post Code</i>	<i>Application date</i>
				02/09/24

24/01811/LBCALT - Amended plan

Replacement of windows with handmade heritage windows to match existing detailing and design, with the exception of having sealed glazing. External redecoration of external joinery.

A summary of the main changes have been set out below:

Changes to the window details to show glazing will be putty, and that the windows will be hand painted finished. Further information provided in heritage report and a window location plan provided to the location of W13-16.

Comment

Proposed by Cllr Michaelides with Cllr Granville's apologies:

Sevenoaks Town Council recommended approval, provided the Conservation Officer is satisfied with the proposed enhancements.

Planning Applications Considered

Applications considered on 9-9-24

7	<i>Plan Number</i>	<i>Planning officer</i>	<i>Town Councillor</i>	<i>Agent</i>
	24/01851/CONVAR	Anna Horn 19/09/2024	Cllr Dr Dixon	Rapleys LLP
<i>Applicant</i>		<i>House Name</i>	<i>Road</i>	<i>Locality</i>
C/O Agent			7 Mount Harry Road	St Johns
<i>Town</i>		<i>County</i>	<i>Post Code</i>	<i>Application date</i>
				29/08/24

Variation of condition 2 of 23/03114/FUL to Demolition of existing dwelling, outbuildings and garages and the erection of three detached residential dwellings (C3 Use) with associated parking, landscaping and works with amendment to create individual access to plot 1 & 2. additional basement level with external stairs. Alteration to fenestration.

Comment

Sevenoaks Town Council recommended approval, provided:

- Kent Highways has no objections to the second access point onto Mount Harry Road,
- The Planning Officer is satisfied that the increased fenestration on the left flank of Plot 2 does not detract from the amenity of the future inhabitants of Plot 1 - with obscure glazing to be considered, if necessary, and
- The driveway be conditioned to be permeable, as per Policy L2 of the Sevenoaks Town Neighbourhood Plan.

8	<i>Plan Number</i>	<i>Planning officer</i>	<i>Town Councillor</i>	<i>Agent</i>
	24/01962/FUL	Samantha Yates 18/09/2024	Cllr Daniell	7 Acorns Ltd
<i>Applicant</i>		<i>House Name</i>	<i>Road</i>	<i>Locality</i>
Mr D Vincent		Unit 5, Morewood Close Industr	Morewood Close	Kippington
<i>Town</i>		<i>County</i>	<i>Post Code</i>	<i>Application date</i>
				28/08/24

Change of use of part of the building into a Children's Day Nursery.

Comment

Sevenoaks Town Council recommended approval, provided the Planning Officer is satisfied with the updated travel plan and the amount of outdoor amenity space available to the children.

9	<i>Plan Number</i>	<i>Planning officer</i>	<i>Town Councillor</i>	<i>Agent</i>
	24/02049/HOUSE	Abbey Aslett 18/09/2024	Cllr Granville	Carmen Austin Architectu
<i>Applicant</i>		<i>House Name</i>	<i>Road</i>	<i>Locality</i>
Mr & Mrs Warren			49 St Botolphs Road	Town
<i>Town</i>		<i>County</i>	<i>Post Code</i>	<i>Application date</i>
				28/08/24

First floor side extension, and two storey side extension. Rear single storey extension with rooflights. Single storey extension to front with stone portico. Enlarge existing dormer and create additional dormer to front. New detached garage with rendered walls. Convert existing integral garage into gym. Changes to fenestration. Render walls above brick base, add stone banding and windowsills. Remove concrete roof tiles and replace with slate. Solar panels and sun tunnels on roof. New steps and railings to existing terrace. Changes to landscaping. Fill in existing swimming pool.

Comment

Proposed by Cllr Michaelides with Cllr Granville's apologies:

Sevenoaks Town Council recommended refusal on the grounds of negative impact to the Conservation Area.

Planning Applications Considered

Applications considered on 9-9-24

10	<i>Plan Number</i>	<i>Planning officer</i>	<i>Town Councillor</i>	<i>Agent</i>
	24/02069/HOUSE	Abbey Aslett 18/09/2024	Cllr Gustard	MKA Architects LTD
<i>Applicant</i>		<i>House Name</i>	<i>Road</i>	<i>Locality</i>
Mr E McIlrath		Squirrels	24 Oakhill Road	Kippington
<i>Town</i>		<i>County</i>	<i>Post Code</i>	<i>Application date</i>
				28/08/24
Two storey rear extension, single storey rear extension, alterations to roof, dormer windows, solar panels, rooflights, demolition of existing garage, creation of basement parking. https://pa.sevenoaks.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=SHT0QKBKI2V00				

Comment

Proposed by Cllr Varley with Cllr Gustard's apologies:

Sevenoaks Town Council recommended approval, subject to :

- The Planning Officer being satisfied there is no loss of amenity to neighbours,
- The Arboricultural Officer being satisfied with the proposals to protect the established Oak tree
- A condition being set that any trees to be lost should be replaced, as per Policy L4 of the Sevenoaks Town Neighbourhood Plan
- A condition being set that the driveway should have a permeable finish, as per Policy L2 of the Sevenoaks Town Neighbourhood Plan

11	<i>Plan Number</i>	<i>Planning officer</i>	<i>Town Councillor</i>	<i>Agent</i>
	24/02127/HOUSE	Summer Aucoin 18/09/2024	Cllr Clayton	WealdDesigns
<i>Applicant</i>		<i>House Name</i>	<i>Road</i>	<i>Locality</i>
Mr L Davis			33 Prospect Road	Eastern
<i>Town</i>		<i>County</i>	<i>Post Code</i>	<i>Application date</i>
				28/08/24
Loft conversion with dormer extension to rear, dormer and rooflight to front.				

Comment

Sevenoaks Town Council recommended approval, provided:

- The Conservation Officer being satisfied that the rear dormer - which will be visible from St Johns Hill - is in scale with the building and meets Conservation Area criteria
- The Planning Officer being satisfied there is no overlooking of neighbouring properties.

12	<i>Plan Number</i>	<i>Planning officer</i>	<i>Town Councillor</i>	<i>Agent</i>
	24/02149/CONVAR	Samantha Yates 17/09/2024	Cllr Varley	Andrew Wells Planning &
<i>Applicant</i>		<i>House Name</i>	<i>Road</i>	<i>Locality</i>
Mr & Mrs Barry		Garnetts	Grassy Lane	Kippington
<i>Town</i>		<i>County</i>	<i>Post Code</i>	<i>Application date</i>
				27/08/24

Variation of condition 3 of 22/00375/FUL to subdivision of the plot and erection of one new detached dwelling with associated access with amendment to approved drawings and allow an erection of an attached garage/plant room.

Comment

Sevenoaks Town Council recommended approval, subject to:

- The Planning Officer being satisfied there is no loss of amenity to neighbouring properties,
- The Planning Officer being satisfied with the Tree Protection Plan
- Permitted development rights being removed to prevent the garage from being extended or built higher.

Planning Applications Considered

Applications considered on 9-9-24

13	Plan Number	Planning officer	Town Councillor	Agent
	24/02150/HOUSE	Samantha Yates 14/09/2024	Cllr Willis	Offset Architects
Applicant	House Name	Road	Locality	
Mrs E Felton	1 Knole Paddock	Seal Hollow Road	Town	
Town	County	Post Code	Application date	
			23/08/24	
Single storey rear extension with internal alterations.				

Comment

Proposed by Cllr Michaelides with Cllr Willis' apologies:

Sevenoaks Town Council recommended approval subject to the Conservation Officer being satisfied with the development.

14	Plan Number	Planning officer	Town Councillor	Agent
	24/02165/HOUSE	Stephanie Payne 23/09/2024	Cllr Dr Canet	Harringtons 2006
Applicant	House Name	Road	Locality	
Mr I Gilmartin		7 Oakdene Road	Northern	
Town	County	Post Code	Application date	
			02/09/24	

Demolish garage and erection a single storey rear extension with roof lights. Extend the roof from a hipped end to a gable end and extend the front and rear dormers with Juliet balcony.

Comment

Sevenoaks Town Council recommended approval.

15	Plan Number	Planning officer	Town Councillor	Agent
	24/02173/HOUSE	Christopher Park 23/09/2024	Cllr Layne	OPEN Architecture
Applicant	House Name	Road	Locality	
S & H Cullum		5 Vine Court Road	Eastern	
Town	County	Post Code	Application date	
			02/09/24	

Demolition of existing coal store and chimney to be replaced with single storey ground floor extension to the side/rear of the dwelling and landscape alterations to suit. Removal of outbuilding.

Comment

Sevenoaks Town Council recommended approval provided:

- The Planning Officer is satisfied that that the side boundary does not impact or destabilise the grounds at No.7, with condition to be put on any required boundary treatments to secure this
- The Planning Officer is satisfied that there is sufficient width to the side of the house.

Planning Applications Considered

Applications considered on 9-9-24

16	<i>Plan Number</i>	<i>Planning officer</i>	<i>Town Councillor</i>	<i>Agent</i>
	24/02178/CONVAR	Summer Aucoin 23/09/2024	Cllr Clayton	Sevenoaks Plans Ltd
<i>Applicant</i>	<i>House Name</i>	<i>Road</i>	<i>Locality</i>	
Mr & Mrs Burns		35 Wickenden Road	Eastern	
<i>Town</i>	<i>County</i>	<i>Post Code</i>	<i>Application date</i>	
			02/09/24	
Variation of condition 2 (approved plans) of 23/03047/HOUSE to Garage conversion to living space with alterations to floor level. Alterations to first floor level including new hip roof to match existing roof height with gable to rear. Single storey rear infill extension. Driveway extension with glass balustrade and ramp. Alteration to fenestration. with amendment to Demolish wall to add an extra parking area. Alteration to approved fenestration with additions and proposed rooflight and solar panels. Internal alterations.				

Comment

Sevenoaks Town Council recommended approval, provided at least part of the front wall, and the Rowan tree in the front garden can be conditioned to be retained in order to protect the residential character of the street.

The Town Council also requested that Sevenoaks District Council Planning Officers check the levels of the new parking, to ensure that parked cars do not dominate the street, and that a planning condition be set to ensure that the parking surface is permeable as required in Policy L2 of the Sevenoaks Town Neighbourhood Plan.

Sevenoaks Town Council Planning & Environment Committee 09-09-2024

Agenda Item 7:

Initial draft response to the below consultation, as prepared by a Working Group comprising Cllr Shea, Cllr Clayton, Cllr Wightman and Cllr Camp. Draft answers provided in green up to Question 45, with the remainder due to be provided 23rd September 2024.

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>

Question 1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?

Yes/No, with textbox to explain your answer.

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 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.

Question 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?

Yes/No, with textbox to explain your answer.

No.

Question 3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?

Yes/No, with textbox to explain your answer.

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.

Question 4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?

Yes/No, with textbox to explain your answer.

No - protections need to continue to exist to safeguard the character and heritage of towns and villages.

Question 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?

Yes/No, with textbox to explain your answer.

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 to be incorporated to their designs at the early stages, and cohesion between individual developments.

Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?

Yes/No, with textbox to explain your answer.

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-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.

Officer note:

Section 16 states the following: *"Currently, the presumption is triggered when there are 'no relevant development plan policies', or those which are 'most important for determining the application are out-of-date [...]' To bring clarity, we propose making clear that the relevant policies are those for the supply of land".*

I don't believe Neighbourhood Plans currently count in the definition of "relevant development plan policies" – which is why the presumption is still triggered in Sevenoaks Town despite having a current NDP. Unfortunately, it makes sense that the STNP wouldn't count in either the previous or new definition, as it does not allocate housing sites or propose housing numbers to count toward the supply requirements. It may be worth asking however, if NDPs could be considered towards this anyway, *if* they do allocate a certain % of the housing supply. This could help other Towns that do have an NDP in place but not a up to date Local Plan, in protecting their local character.

Question 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/No, with textbox to explain your answer.

Yes. Sevenoaks Town Council supports this, as it enables longer term planning and fits better with Neighbourhood Development Plans (NDPs), Masterplans and planning for sustainability. It should also reflect needs expressed in NDPs.

Question 8: Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?

Yes/No, with textbox to explain your answer.

Yes. Sevenoaks Town Council supports this, however recommends that this needs to be set against a continuous 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.

Question 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?

Yes/No, with textbox to explain your answer.

No – Sevenoaks Town Council does not consider this isn't necessary.

Question 10: If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?

Yes (5% is an appropriate buffer) / No (It should be a different figure), with textbox to explain your answer if you believe a different % buffer should be used

No.

Question 11: Do you agree with the removal of policy on Annual Position Statements?

Yes/No, with textbox to explain your answer.

No comment.

Question 12: Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

Yes/No, with textbox to explain your answer.

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.

Question 13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

Yes/No, with textbox to explain your answer.

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 infra, ahead of or alongside any planning application which would require their cooperation or input. These strategic scale proposals also 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.

Question 14: Do you have any other suggestions relating to the proposals in this chapter?

Textbox.

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.

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 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.

Question 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?

Yes/No, with textbox to explain your answer.

No comment.

Question 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 available to adjust the standard method's baseline, is appropriate?

Yes/No, with textbox to explain your answer.

Sevenoaks Town Council recommends that any method of calculating the baseline needs to recognise that there are some places, including Sevenoaks Town, where part of local housing market is dominated from salaries from elsewhere – primarily London which has a higher average salary.

Question 17: Do you agree that affordability is given an appropriate weighting within the proposed standard method?

Yes/No, with textbox to explain your answer.

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.

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.

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.

Question 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?

Yes/No, with textbox to explain your answer.

Sevenoaks Town Council reiterated its earlier point, 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 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.

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.

Question 19: Do you have any additional comments on the proposed method for assessing housing needs?

Sevenoaks Town Council reiterated its earlier point, 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 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.

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.

Question 20: Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?

Yes/No, with textbox to explain your answer.

Yes.

Question 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?

Yes/No, with textbox to explain your answer.

Yes.

Question 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?

Textbox for providing any further views.

Sevenoaks Town Council recommended that the definition should be left as it is and not expanded.

Question 23: Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

Yes/No, with textbox to explain your answer.

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.

Question 24: Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

Yes/No, with textbox to explain your answer.

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.

Question 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?

Yes and it should be contained within the NPPF / Yes and it should be contained within PPG / No, with textbox to explain your answer.

Yes – Sevenoaks Town Council advises that this should be done by local authorities, not landowners/developers.

Question 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?

Yes/No, with textbox to explain your answer.

No.

Question 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?

Yes/No, with textbox to explain your answer.

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.

Question 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?

Yes/No, with textbox to explain your answer.

Yes.

Question 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?

Yes/No, with textbox to explain your answer.

Yes.

Question 30: Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

Yes/No, with textbox to list what changes you would recommend.

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 advised that development on the Green Belt must be plan-led.

Question 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?

Yes/No, with textbox to explain your answer.

Sevenoaks Town Council advised 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.

Question 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?

Yes/No, with textbox to explain your answer.

Yes – Sevenoaks Town Council advises that there is vast unmet traveller site need, and recommended that adequate provision should be allocated via local plans – including facilities.

Question 33: 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?

Yes/No, with textbox to explain your answer.

Yes, - provision need for traveller sites should not be excluded from the approach and should be actively provided for.

Question 34: Do you agree with our proposed approach to the affordable housing tenure mix?

Yes/No, with textbox to explain your answer.

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.

Question 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?

Answer choices: The 50% target should apply to all Green Belt areas (including previously developed land in the Green Belt) / The Government or local planning authorities should be able to set lower targets in low land value areas, with textbox to explain your answer.

50% target.

Question 36: Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

Yes/No, with textbox to explain your answer.

Yes

Question 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?

Yes/No, with textbox to explain your answer.

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 therefore needed to support this.

Question 38: How and at what level should Government set benchmark land values?

Textbox.

Sevenoaks Town Council advises that this 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.

Question 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?

Yes/No, with textbox to explain your answer.

Yes, Sevenoaks Town Council supports this in principle.

Question 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?

Textbox.

Sevenoaks Town Council agreed that, if 50% affordable housing has been secured through a development and it is policy compliant, additional should be not be sought to the detriment of other provisions such as infrastructure.

Question 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?

Yes/No, with textbox to explain your answer, including what support you consider local authorities would require to use late-stage viability reviews effectively.

No, Sevenoaks Town Council advises that trying to unpick these types of negotiations could introduce more uncertainty and delay development.

Question 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?

Yes/No, with textbox to explain your answer.

Yes – Sevenoaks Town Council considers that there should be community benefits for non-residential development including infrastructure and access improvements.

Question 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?

Yes/No, with textbox to explain your answer.

Yes, Sevenoaks Town Council considers that this should apply to draft Local Plans.

Question 44: Do you have any comments on the proposed wording for the NPPF (Annex 4)?

Yes/No, with textbox to explain your answer.

No comment.

Question 45: Do you have any comments on the proposed approach set out in paragraphs 31 and 32?

Yes/No, with textbox to explain your answer.

Yes – Sevenoaks Town Council advised 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 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.

Question 46: Do you have any other suggestions relating to the proposals in this chapter?

Yes/No, with textbox to explain your answer.

Question 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/No, with textbox to explain your answer.

Question 48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

Yes/No, with textbox to explain your answer.

Question 49: Do you agree with removing the minimum 25% First Homes requirement?

Yes/No, with textbox to explain your answer.

Question 50: Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?

Yes/No, with textbox to provide any further comment.

Question 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Yes/No, with textbox to explain your answer.

Question 52: What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?

Textbox.

Question 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?

Textbox.

Question 54: What measures should we consider to better support and increase rural affordable housing?

Textbox.

Question 55: Do you agree with the changes proposed to paragraph 63 of the existing NPPF?

Yes/No, with textbox to explain your answer.

Question 56: Do you agree with these changes?

Yes/No, with textbox to explain your answer.

Question 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/No, with textbox to recommend changes.

Question 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/No, with textbox to explain your answer.

Question 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/No, with textbox to explain your answer.

Question 60: Do you agree with proposed changes to policy for upwards extensions?

Yes/No, with textbox to explain your answer.

Question 61: Do you have any other suggestions relating to the proposals in this chapter?

Yes/No, with textbox to explain your answer.

Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

Yes/No, with textbox to explain your answer.

Question 63: Are there other sectors you think need particular support via these changes? What are they and why?

Yes/No, with textbox to explain your answer.

Question 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?

Yes/No, with textbox to explain your answer.

Question 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?

Yes/No, with textbox to suggest an appropriate scale.

Question 66: Do you have any other suggestions relating to the proposals in this chapter?

Yes/No, with textbox to explain your answer.

Question 67: Do you agree with the changes proposed to paragraph 100 of the existing NPPF?

Yes/No, with textbox to explain your answer.

Question 68: Do you agree with the changes proposed to paragraph 99 of the existing NPPF?

Yes/No, with textbox to explain your answer.

Question 69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

Yes/No, with textbox to explain your answer.

Question 70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

Textbox.

Question 71: Do you have any other suggestions relating to the proposals in this chapter?

Yes/No, with textbox to explain your answer.

Question 72: Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

Yes/No, with textbox to explain your answer.

Question 73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

Yes/No, with textbox to explain your answer.

Question 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 compensatory mechanisms put in place?

Yes/No, with textbox to explain your answer.

Question 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?

Yes/No, with textbox to explain your answer.

Question 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/No, with textbox to explain your answer.

Question 77: If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?

Textbox.

Question 78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

Textbox.

Question 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?

Textbox.

Question 80: Are any changes needed to policy for managing flood risk to improve its effectiveness?

Yes/No, with textbox to explain your answer.

Question 81: Do you have any other comments on actions that can be taken through planning to address climate change?

Yes/No, with textbox to explain your answer.

Question 82: Do you agree with removal of this text from the footnote?

Yes/No, with textbox to explain your answer.

Question 83: Are there other ways in which we can ensure that development supports and does not compromise food production?

Yes/No, with textbox to explain your answer.

Question 84: Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?

Yes/No, with textbox to explain your answer.

Question 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?

Yes/No, with textbox to explain your answer.

Question 86: Do you have any other suggestions relating to the proposals in this chapter?

Yes/No, with textbox to explain your answer.

Question 87: Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?

Yes/No, with textbox to explain your answer.

Question 88: Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?

Yes/No, with textbox to explain your answer.

Question 89: Do you agree with the proposal to increase householder application fees to meet cost recovery?

Yes/No, with textbox to explain your answer.

Question 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.

Yes/No, with textbox to explain what you consider an appropriate fee increase.

Question 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?

Answer options: Yes / No – it should be higher than £528 / No – it should be lower than £528 / No - there should be no fee increase / Don't know, with text box to explain "No" response (if applicable) as well as evidence demonstrating what you consider the correct fee to be.

Question 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.

Yes/No, with textbox to explain your answer.

Question 93: 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.

Yes/No, with textbox to explain your answer and provide reasons on what you consider the correct fee to be.

Question 94: Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?

Please give your reasons in the text box below.

Yes/No, with textbox to explain your answer.

Question 95: What would be your preferred model for localisation of planning fees?

Answer options: Full Localisation – Placing a mandatory duty on all local planning authorities to set their own fee. / Local Variation – Maintain a nationally-set default fee and giving local planning authorities the option to set all or some fees locally. / Neither / Don't Know, with text box to explain your answer.

Question 96: Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?

Yes/No, with textbox to explain your answer and explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development?

Question 97: What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?

Yes/No, with textbox to explain your answer.

Question 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?

Yes/No.

Question 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.

Textbox.

Question 100: What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?

Textbox.

Question 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.

Textbox.

Question 102: Do you have any other suggestions relating to the proposals in this chapter?

Yes/No, with textbox to explain your answer.

Question 103: Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?

Yes/No, with textbox to explain your answer.

Question 104: Do you agree with the proposed transitional arrangements?

Yes/No, with textbox to explain your answer.

Question 105: Do you have any other suggestions relating to the proposals in this chapter?

Yes/No, with textbox to explain your answer.

Question 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?