



Chalfont St Peter Parish Council Representations Proposed reforms to the National Planning Policy Framework

This report highlights the views of the Chalfont St Peter Parish Council on the proposed approach to revising the National Planning Policy Framework.

September 2024



Chalfont St Peter Parish Council

Council Offices, Gravel Hill, Chalfont St Peter, Bucks, SL9 9QX

www.chalfontstpeter-pc.gov.uk

Telephone: 01753891582

Email: clerk@chalfontstpeter-pc.gov.uk



Troy Planning + Design

41-42 Foley Street, Fitzrovia London W1W 7TS

www.troyplanning.com

Telephone: 02070961329

Email: info@troyplanning.com



Table of Contents

| | |
|--|-----------|
| 1. Introduction..... | 1 |
| 2. Chalfont St Peter Parish..... | 1 |
| 3. Presumption of sustainable development and plan-making changes to the NPPF | 2 |
| 4. Changes to housing policies and their implications in Chalfont St Peter | 3 |
| 5. Changes to Green Belt policies and their implications in Chalfont St Peter | 5 |
| 6. Conclusion | 14 |
| Appendix A – Responses to consultation questions | 15 |

1. Introduction

- 1.1. These representations provide a response, prepared by [Troy Planning + Design \(Chartered Town Planners\)](#) on behalf of Chalfont St Peter Parish Council (CSPPC), to the Government's consultation on the proposed changes to the National Planning Policy Framework.
- 1.2. The consultation runs from Tuesday 30 July 2024 until Tuesday 24 September 2024 and it seeks the views on the government's proposed approach to revising the National Planning Policy Framework (NPPF).
- 1.3. The report is structured with sections that analyse the most-relevant proposed NPPF changes in the context of Chalfont St Peter and a conclusion. **Appendix 1** includes responses to the Government questionnaire on the proposed changes to the NPPF.

2. Chalfont St Peter Parish

- 2.1. Chalfont St Peter is a village and small parish located in the south-east of Buckinghamshire (Buckinghamshire Council formerly Chiltern District) surrounded by Green Belt.
- 2.2. The village and its settlement boundary adjoin on their southern boundary with the settlement of Gerrards Cross, where there is a railway station approximately 1.5 miles from the Chalfont St Peter's village centre. To the north, there is a narrow open countryside gap of approximately 500 metres at the narrowest point, between Chalfont St Peter and the village of Chalfont St Giles. Whilst there are gaps to the east and west between the village and other built-up areas, there have been recent encroachments into the countryside and Green Belt, especially to the east of the village such as the Newland Farm development and HS2 rail infrastructure.
- 2.3. Chalfont St Peter is mainly served by Amersham Road (A413), which runs north to south following the floor of Misbourne Valley, connecting to Amersham to the north and London and the M40 and M25 to the south. Whilst the village is not served by rail, there are rail services from Gerrards Cross and the Metropolitan Line at Little Chalfont & Latimer, 5 miles north of the village, connecting this area with central London.
- 2.4. It is important to note that the village that runs mostly along the Misbourne Valley (north to south) and that the east and west sides of the parish remain open countryside. The whole of the parish, except for the area within the settlement boundary, is designated Green Belt and most of the eastern part of the Green Belt in the parish lies within the Colne Valley Park and part of the northeast section is within the Chilterns National Landscape (AONB).
- 2.5. Chalfont St Peter Parish Council has made an application to Natural England as part of the boundary review of the Chilterns National Landscape for the inclusion of the

parish in the National Landscape (of future National Park). The statutory consultation is expected to take place in winter 2024/2025.

3. Presumption of sustainable development and plan-making changes to the NPPF

Presumption of sustainable development

- 3.1. The proposed amendments to the presumption of sustainable development for decision-taking are welcomed insofar as the proposed wording of the scenario is clearly defined in the revised text where it refers to the cases when policies for the supply of land are out-of-date and refer only to policies that supply land for development, either through requirements, allocations or allowances for windfall sites.
- 3.2. CSPPC is satisfied that the presumption in favour of sustainable development in the case of out-of-date policies for the supply of land would not necessarily lead to a deterioration of the built and natural environment and the provision of affordable homes, as the proposed text of the NPPF includes a particular emphasis on the adverse impacts of granting permission related to the location and design of the development and securing affordable homes.
- 3.3. Overall, CSPPC supports the clarification of the presumption of sustainable development with regards to the policies that can be considered out-of-date (supply of land). CSPPC also welcomes the emphasis on the importance of the location and design of development and affordable housing when applying the presumption in favour of sustainable development. Notwithstanding this, the Council is concerned with the ambiguity of the text, as it does not express how much weight is to be given to the three factors: location, design and affordable housing. This should be better explained in the NPPF (perhaps as a footnote) to avoid misuse and misinterpretation.

Plan-making

- 3.4. CSPPC is supportive of strengthening effective strategic planning across local authority boundaries and that matters such as meeting housing need, strategic infrastructure and economic and climate resilience are mentioned as matters to address through the duty to cooperate.
- 3.5. However, CSPPC is concerned that the proposed changes to the NPPF fail to mention the Green Belt as a key spatial issue. Green Belt reviews / assessments are not typically coordinated across local authority boundaries. In many cases authorities use differing methodologies for assessing Green Belt land which can result in inconsistencies and a lack of a strategic approach to understanding the value of Green Belt for a 'more than local' area.
- 3.6. This has worryingly also been the approach in London despite the original strategic purpose of the Metropolitan Green Belt was to prevent the sprawl of London. This

lack of coordination is highlighted in the Panel Report to the Mayor of London (2019) for the London Plan (2021). The Report states:

“Different approaches to doing a Green Belt review have been canvassed ranging from requiring boroughs to undertake them based on assessment criteria devised by the Mayor, to the Mayor undertaking that work himself and to the identification of specific growth areas or corridors.”

The Panel recommends that any future Green Belt review of London needs to take account of cross-boundary issues in relation to the Green Belt’s coherence and durability on the periphery of London (in addition to across London). In order to achieve an effective review, the report explains a key requirement is joint working and positive engagement with adjoining authorities.

“Any exercise should consequently take account of cross-boundary issues relating to the coherence and durability of the Green Belt on the periphery of the capital as well as across London itself. Therefore, a key part of an effective review in London is likely to involve joint working and positive engagement with adjoining authorities and boroughs”.

- 3.7. The methodology and process of any London Green Belt review should be developed through engagement with neighbouring and adjoining authorities as well as communities including local councils (town and parish councils). This should inform any Green Belt reviews undertaken outside the capital under the duty to cooperate including in Buckinghamshire.

4. Changes to housing policies and their implications in Chalfont St Peter

- 4.1. Chalfont St Peter Parish Council is satisfied with the proposed removal of the First Homes requirements from national policy and the return to local planning policy decision on this matter. However, the Parish Council would expect further changes to the NPPF to ensure that Local Planning Authorities and local communities (through Neighbourhood Planning) are able to prioritise the proportion and type of affordable homes their communities need on all housing development. Affordable housing and mix of homes (size, type and tenure) would be better specified in Local Plans and Neighbourhood Development Plans, where they respond to the specific local housing needs rather than a nation-wide planning policy requirement that is not reflective of local context.
- 4.2. Further to this point CSPPC has prepared a Housing Needs Assessment (2021) which assesses the potential role of delivering First Homes in the parish based on the proposed national policy at the time. Therefore, the new Government should ensure funding is made available to Neighbourhood Plan groups that require an update to their Housing Needs Assessment reports based on any changes to the NPPF that have a material impact on the existing reports.

Standard Method and housing numbers

- 4.3. New paragraph 62 would require all strategic policies to be informed by housing need assessments conducted using the Standard Method (SM), which would become mandatory instead of advisory. Alternative approaches for establishing the housing requirements due to exceptional circumstances are proposed for removal from the NPPF.
- 4.4. According to the Standard Method's estimated projections, Buckinghamshire would have a new housing target, increasing from 61,152 to 86,562 dwellings by 2045. The proposed increases resulting from the new SM, in the absence of exceptional circumstances, would lead to an increase of the housing target by 42%. Additionally, Buckinghamshire would see an increase of this target by an extra 5%.
- 4.5. Whilst a new town in Buckinghamshire could be proposed in the Local Plan and theoretically consist of 10,000 dwellings, if proposed in line with the Government's Policy Paper on New Settlements (31st July 2024), the Parish Council is concerned with the time it would take for the housing numbers to materialise on the ground and its ability to deliver critical infrastructure and affordable housing. There is extensive evidence on strategic site delivery rates (see Start to Finish Report, Lichfields, 2024) that raises serious questions as to how much Local Planning Authorities can rely on new settlements to make an impact on their local plan housing trajectories. The concern is that any shortfall of delivery on strategic sites / new towns would put pressure on sites and areas unsuitable for development, such as Chalfont St Peter which lack the critical infrastructure necessary to support new development.
- 4.6. In addition, Chalfont St Peter is subject to regular flooding which impacts on the low lying and historic settlement alongside the chalk stream, The Misbourne, which runs through the village centre. Excessive groundwater also forces untreated sewage into the village high street and adjoining residential streets. The village has been selected by Buckinghamshire Council for a Project Groundwater exercise looking at ways of managing the perpetual flooding.
- 4.7. Despite this ambitious housing requirement figure it is the CSPPC's view that the parish has very limited or almost negligible capacity to absorb more housing, especially in large amounts. All the land outside of the settlement boundary in the parish is designated Green Belt, some of it also lies within the Chilterns National Landscape (AONB). Any development within these two would surely erode their own reason for designation.
- 4.8. Facilitating new development and increasing housing stock is supported by CSPPC. Notwithstanding this, the Government's proposal for identifying grey belt land (or previously developed land, PDL) that make limited contribution to the Green Belt, as a tool to enable development in the Green Belt is concerning.

- 4.9. CSPPC is concerned with the new SM that would not allow Local Plans to modify their housing need according to local constraints. Chalfont St Peter has several constraints that such as the Green Belt, the Chilterns National Landscape, flood risk areas, land of agricultural value, etc. that would normally justify departing from the SM. This would no longer be the case and CSPPC wonder why the method is not based on a national strategic spatial strategy for growth, identifying the areas that can take more housing, according to an assessment of their context: landscape, infrastructure, economic opportunities, transport, etc. Instead, the Government applies a standard method that would lead to substantial growth in housing numbers, which would be spread across the country without a spatial strategy in place.

5. Changes to Green Belt policies and their implications in Chalfont St Peter

- 5.1. CSPPC is a village with a settlement boundary with very limited capacity for change and expansion. The Green Belt surrounds the village and covers the whole parish. The parish supports innovation in planning to increase development opportunities and deliver more housing for those who need them the most, especially young people. However, the Green Belt plays an important role in the village and the wider area, as well as in the environment, which should not be eroded. Housing should also be built where could lead to complete neighbourhoods, sustainable in terms of location and services.
- 5.2. CSPPC is concerned with the changes in the protection of the Green Belt and we highlight in the commentary below the Council's views on the proposed changes.
- 5.3. The call for local planning authorities to plan positively to enhance Green Belt's beneficial use, set out in proposed paragraph 147 needs to be made stronger. Paragraph 146 and related Planning Practice Guidance around 'exceptional circumstances' should require consideration of the promotion of the improvement of the Green Belt's multi-functionality.

Review of Green Belt boundaries

- 5.4. The new paragraph 144 of the NPPF should specify that the first option when reviewing the Green Belt boundary should be to consider previously developed land in sustainable locations outside of the Green Belt. Then, sustainable locations in grey belt land, and other sustainable Green Belt locations as the last alternative available. The text should specifically not allow considering land within the Green Belt that is not considered a sustainable location.
- 5.5. CSPPC finds it disappointing that the proposed new NPPF text does not identify specific mechanisms for local communities to define their grey belt and the sustainable locations within the Green Belt. Given the constraints found in Chalfont St Peter for new development in the Green Belt, it would be expected that the national policy would allow for local communities to have a say in identifying where,

according to national criteria, development opportunities in grey belt land and the Green Belt are, through neighbourhood planning.

Grey Belt designation and its 'limited contribution'

5.6. Local Planning Authorities would be required to designate areas that make a 'limited contribution' to the overall Green Belt as 'grey belt' land and developers would also be able to put forward sites that they claim are 'grey belt'.

5.7. Grey belt is defined in the proposed NPPF as follows:

"For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the green belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework), but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt)."

5.8. CSPPC considers that the definition of grey belt is very vague and could lead to many applications to build across much of the Green Belt. The CSPPC is concerned that developers will be able to put forward sites that they claim that contribute 'grey belt' and that the definition or consideration of land as grey belt should only remain in Local planning Authority's hands, not allowing speculative applications from developers and leading to the degradation of land by landowners for future PDL consideration.

5.9. The CSPPC understands that not all the Green Belt performs the same when assessed against the 5 purposes (Paragraph 143 NPPF) of Green Belts. However, the fundamental aim of the Green Belt policy (Paragraph 142), which remains unchanged in the proposed NPPF, is to prevent urban sprawl by keeping land permanently open. It also states that the essential characteristics of Green Belts are their openness and their permanence.

5.10. The fundamental aim and essential characteristics of Green Belts are jeopardised by the proposed modifications to the NPPF, and in particular, by the relaxation that would allow development in previously developed land within the Green Belt.

5.11. The five Green Belt purposes are (new Paragraph. 140 NPPF):

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

5.12. Chalfont St Peter is a village wholly surrounded by the Green Belt, and only separated from Chalfont St Giles by a gap of approximately 500 metres and by an 800 metres gap to the Jordans built up area to the west. There is no gap or separation between the village and Gerrards Cross, as both settlements are already joined. There is also open countryside to the east, although this is being eroded by recent residential development at the old Epilepsy Society site and Newland Farm, current planning applications for 1,000 homes on the edge of the village, as well as nationally important infrastructure (M25 and HS2).

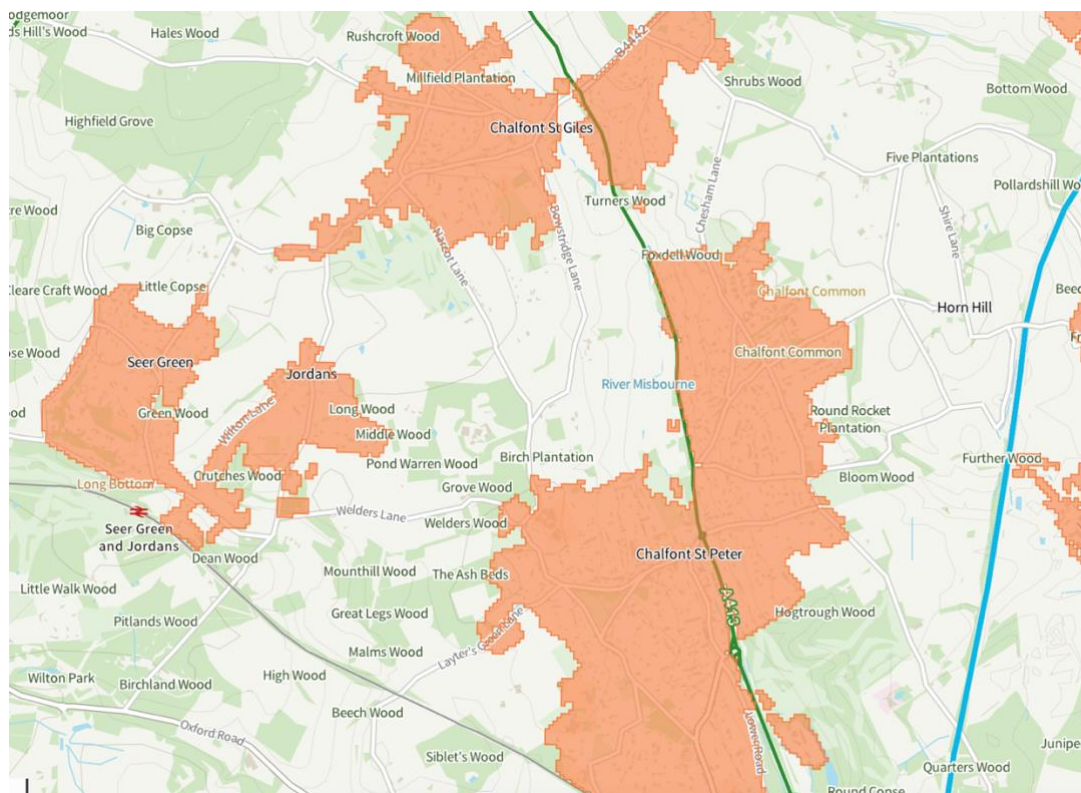


Figure 1. Map illustrating the built-up area of Chalfont St Peter and nearby settlements.
Map of planning data for England (<https://www.planning.data.gov.uk/map/>)

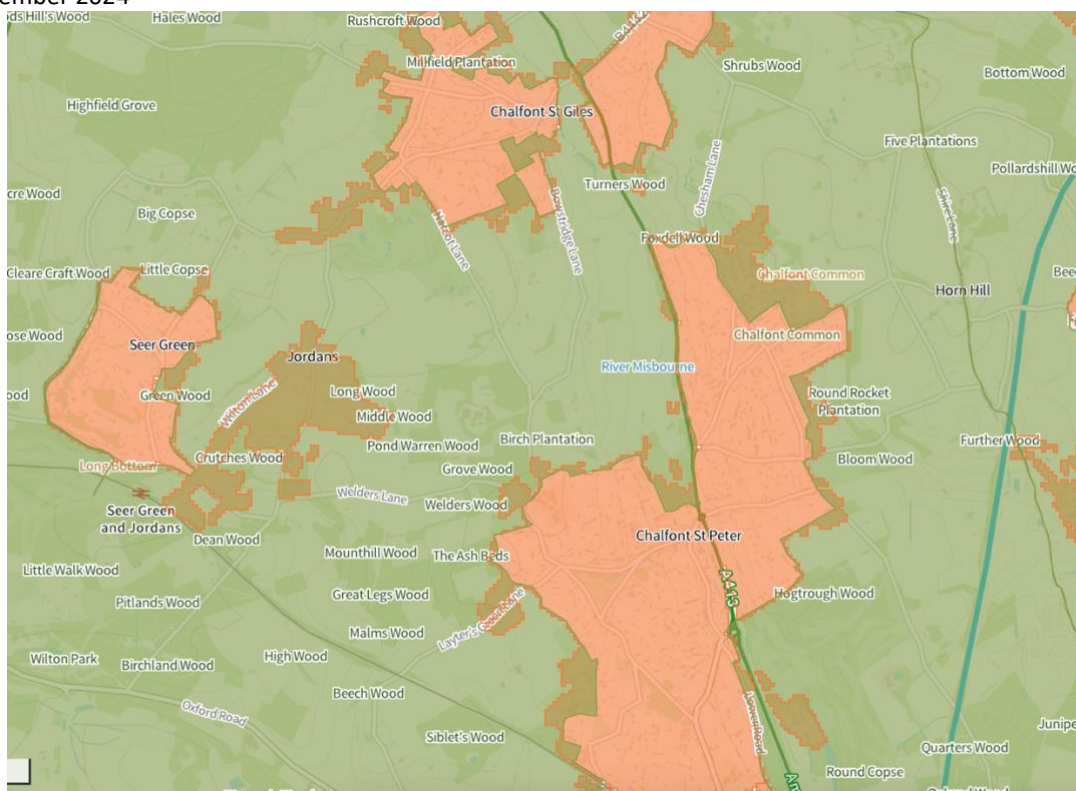


Figure 2. Overlay of Green Belt and built-up areas of Chalfont St Peter and nearby settlements. Map of planning data for England
 (<https://www.planning.data.gov.uk/map/>)

5.13. The above showcases the limited open countryside available around the village, which, to date, has contributed well to the prevention of urban sprawl in the area and keeping the land around Chalfont St Peter permanently open. Notwithstanding this, given the close distance of the village to built-up areas and infrastructure, the relaxation of the Green Belt protection in new paragraph 152 of the NPPF could lead to new development within the above-mentioned areas that may not necessarily lead to the undermining of the Green Belt across the area of the plan as a whole, but would drastically undermine or even obliterate the Green Belt in the context of the village. The new planning policy text, by referring to the local plan area, instead to the local area and the implications in terms of the five purposes of the Green Belt applied in this case, to the village, would leave the door open to significant new development within the Green Belt around Chalfont St Peter.

5.14. In the context of such extensive Green Belt and considering the proposed new paragraph 152, housing, commercial and other development in the Green Belt could end up being considered appropriate in Green Belt, according to the NPPF, as the area within Chalfont St Peter Parish of the Green Belt is very limited when compared to the whole Buckinghamshire Green Belt. This would lead to unacceptable impacts on the village itself and its surrounding countryside, despite of the more limited impacts on the whole Green Belt. Therefore, we request that this paragraph is modified to avoid localised negative impacts.

- 5.15. Therefore, the proposed wording of the NPPF would facilitate the sprawl of villages into the countryside (Chalfont St Peter and other villages in the area), undermining purpose 1 of the Green Belt, and whilst the NPPF wording does refer to the local plan area as a whole, the implications at a local level (parish) would be catastrophic, with the potential loss of much of the open countryside around the village. This would also lead to an unacceptable merge with nearby settlements (as mentioned, there is a close distance to other settlements to the north and west of Chalfont St Peter), failing to meet purpose 2 of the Green Belt which is relates to the prevention of neighbouring towns merging into one another.
- 5.16. The role that Green Belt plays in safeguarding the countryside from encroachment would also be undermined, and as mentioned in this report, it would not only cause the loss of open countryside, but also would have implications in the loss of good and moderate quality agricultural land and impacts on ancient woodland.
- 5.17. New development within the Green Belt would not only have direct impact on the belt and its purposes but would also lead to indirect impacts on other significant assets and designations in the Chalfont St Peter area. A non-exhaustive list follows:
- **Ancient woodland.** There are numerous areas of woodland habitat within the parish and the Green Belt, some of which are Ancient Woodland, and some of these are adjacent to areas that could be determined previously developed land in time. Relaxing the redevelopment opportunities of these areas adjacent to or nearby Ancient Woodland would lead to a potential deterioration of these important habitats due to human activity disturbance, including pets
 - **Chilterns National Landscape and its setting.** The Green Belt is a positive contributor to the setting of the Chilterns National Landscape (AONB), some of which is within the north area of the parish. Development within the Green Belt would not only impact the Chilterns directly if developed within the National Landscape designated area, but also indirectly if development takes place outside, within the setting, as the Green Belt is a positive contributor of the setting.

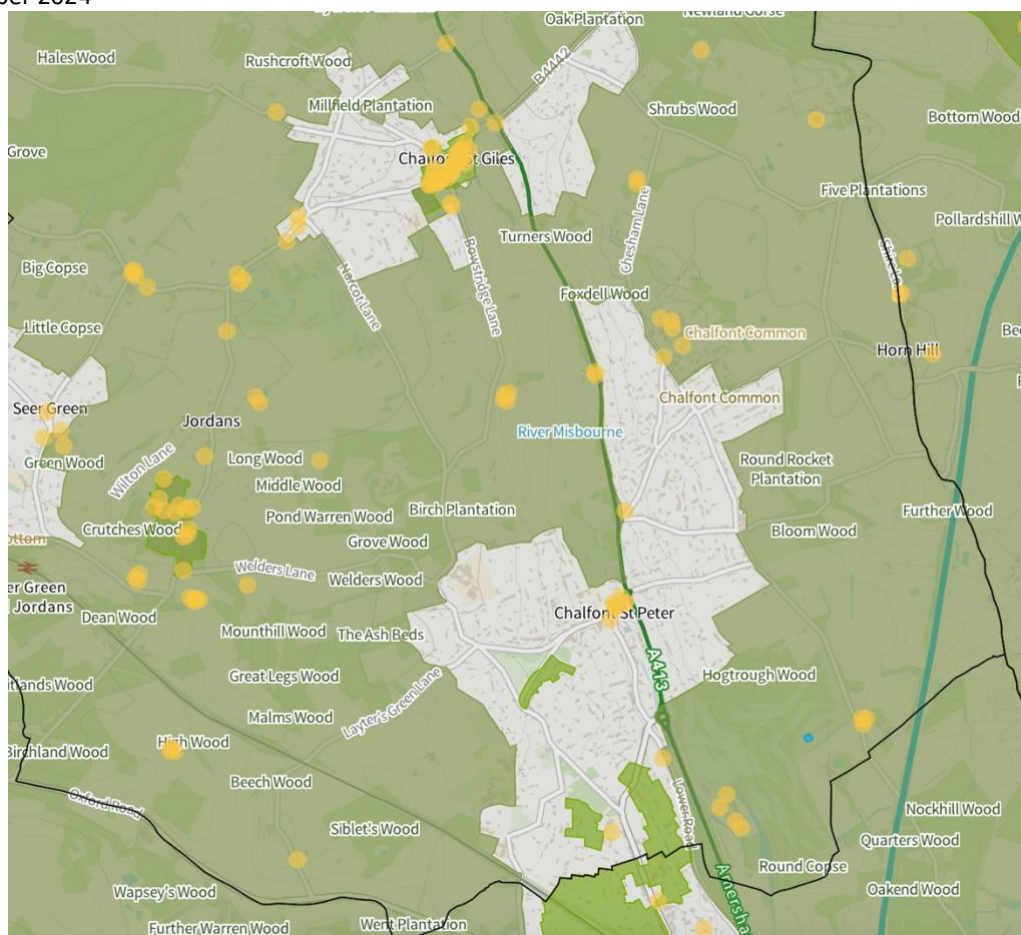


Figure 3. Listed buildings (yellow dots) and scheduled monuments (blue dots) within the Chalfont St Peter Parish and the Green Belt. Map of planning data for England (<https://www.planning.data.gov.uk/map/>)

- Heritage.** There are several listed buildings and a scheduled monuments in the Green Belt area in the Chalfont St Peter Parish. Many of these heritage assets are part of historic farmsteads or residential buildings, which could, depending on their use evolution, be developed as part of grey belt land. Albeit each heritage asset's significance is different one from another, those located in the open countryside are characterised by a rural, and usually undisturbed or farming setting. New development would add significant pressure on these assets, which conservation and enhancement would be in jeopardy by the national policy support for new development in grey belt land. This is particularly problematic as new development supported by the NPPF in the Green Belt would not be necessarily linked to land-based-economies: agriculture, forestry, etc. but modern commercial, residential or industrial.
- Village centre.** Development outside of the settlement would add pressure for additional traffic into the village centre, increasing parking demand within the area too, thus jeopardising high quality public realm and sustainable access to shops and community facilities. Almost all existing community assets lie to the West of the village centre. A large community college, five other schools, a leisure centre, three medical practices and a community health clinic/hub and

the main shopping street are accessible to those living to the East side of the A413, only through the narrow village centre where there is no scope at all for widening highway infrastructure to match increased demands for their use.

- **Green Infrastructure and biodiversity.** Whilst Green Belts are not designated for environmental reasons, they provide ecosystem services, including access to nature to the public, and wildlife corridors connecting existing habitats and networks. These are also at risk of erosion by an increase in the developable areas within Green Belts.
- **Flood risk.** As stated in paragraph 4.5 above, Chalfont St Peter is subject to regular flooding which impacts on the low lying and historic settlement alongside the chalk stream, the Misbourne, which runs through the village centre. Excessive groundwater also forces untreated sewage into the village high street, and dozens of adjacent homes and businesses are damaged. The parish has been selected by Buckinghamshire Council for a Project Groundwater exercise funded by DEFRA to determine how the impact of excessive ground water and foul water can be managed better. The state of the foul water infrastructure adds to the problems of a low lying village centre in a flood plain.
- **Food production and agricultural land.** Most land around the village of Chalfont St Peter is classified Grade 3 (Good to moderate quality). This is land “with moderate limitations that affect the choice of crops, timing and type of cultivation, harvesting or the level of yield. Where more demanding crops are grown yields are generally lower or more variable than on land in grades 1 and 2.” The Green Belt has been successful in safeguarding land in the countryside for food production, but the relaxation of the Green Belt policies and the proposed increased of housing targets would likely entail the loss of good to moderate quality agricultural land.

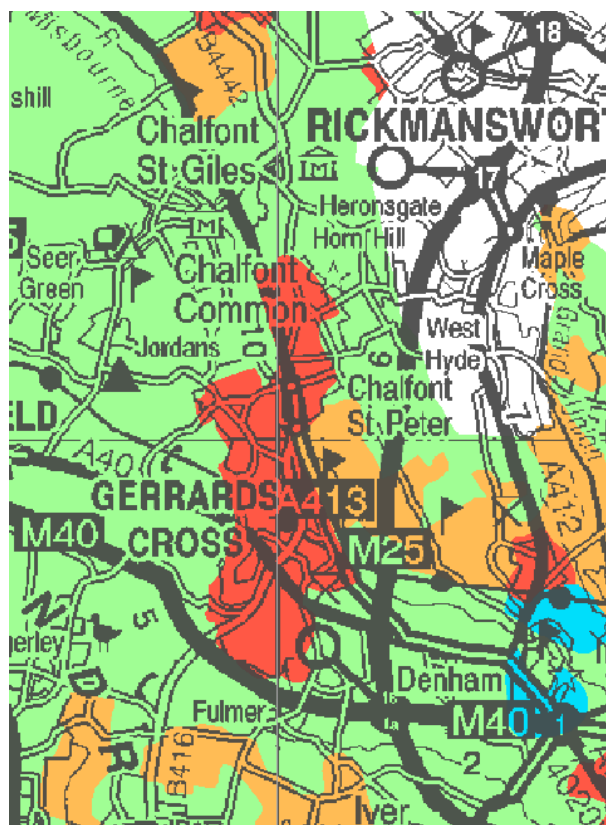


Figure 4. Chalfont St Peter surrounded by Grade 3 agricultural land (shown in green).
 Source: Agricultural Land Classification map London and the South East (Natural England, 2010)

The sustainability of the grey belt

- 5.18. Chalfont St Peter Parish Council is concerned that the potential development of housing in the grey belt and ultimately within the Green Belt, given increased housing targets, would lead to drastic negative effects, failing to deliver truly sustainable development.
- 5.19. The proposed wording of the NPPF (new paragraph 152) states that new development in the Green Belt should not be regarded inappropriate where the development utilises grey belt land in sustainable locations. It is unfortunate that the NPPF text does not go beyond and identifies what would make grey belt land a 'sustainable location'. In the view of the CSPPC, grey belt land would be in a sustainable location where it offers accessible public transport and active travel options to employment, services and recreation. Unfortunately, if this is not defined in the NPPF, it would lead to ambiguity in its interpretation and an ineffective or counterproductive policy that would exacerbate the negative social and environmental implications of car-dependent communities on the edge of settlements.
- 5.20. The lack of adequate sustainable transport options in the area (public transport and active travel routes) and a scenario of significant increase of housing and future residents in the village and the Green Belt are of concern. Most of the Green Belt is isolated in terms of sustainable transport, services, facilities and other

infrastructure, therefore bringing development sites forward within these isolated locations would not be appropriate.

- 5.21. This NPPF change could result in increased developable areas within the Green Belt, away from the centre of the village, where most sustainable travel options are located. Developments on the edge would increase the Chalfont St Peter dependence of residents on car usage rather than creating a compact place where services can be reached by walking or cycling. The dependence on car usage, inevitable on edge of the village and Green Belt locations, would lead to increased traffic and congestion in Chalfont St Peter.
- 5.22. When looking at the public transport nodes available in the Chalfont St Peter area in relation to the Green Belt, we notice that most of them are only available within the long-term established settlement boundary and that no public transport options are normally available within the Green Belt, and those available are very limited.

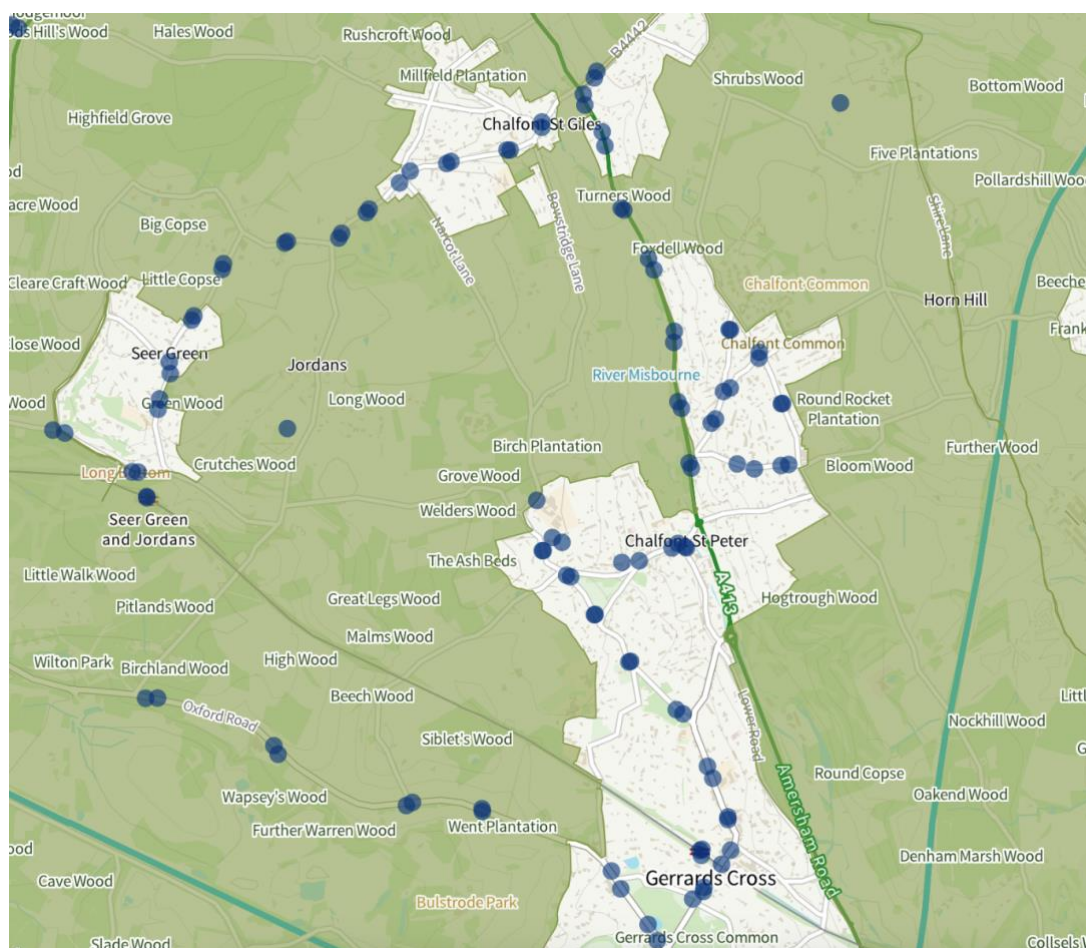


Figure 5. Public access transport nodes (blue dots) and the Green Belt (green). Source: Map of planning data for England (<https://www.planning.data.gov.uk/map/>)

- 5.23. Whilst grey belt proposals could transform towns and villages, these transformations could dramatically erode the social and environmental sustainability of communities, unless the term 'sustainable location' is taken seriously, with ambition, and is better defined. In the context of Chalfont St Peter,

and in the absence of accessible services, rail and bus services within the Green Belt area and other viable active travel options, it is difficult to understand how new development would be sustainable.

Degradation of land in the Green Belt

- 5.24. The CSPPC is concerned with the proposed grey belt land proposals and the lack of mechanisms that would prevent the intended deterioration and degradation of parcels by landowners and land managers for the purpose of developing it later. Should the NPPF facilitate new development in PDL in the Green Belt, the necessary mechanisms should be in place, with the support of the NPPF text, to avoid the proliferation of uses and structures that would contribute towards the consideration of parcels as previously developed land, thus likely to be developed.
- 5.25. Control mechanisms should ensure that previously developed land has achieved that status lawfully and without the intention to later develop it as grey belt land. This could be either with the landowners' provision of evidence (photography) that the parcel of land has been PDL of a long period of time, or by setting out in policy that the relevant parcels of land have been PDL before the date of adoption of the proposed changes to the NPPF. These mechanisms would prevent from the deliberate deterioration of land within the Green Belt.

6. Conclusion

- 6.1. Chalfont St Peter Parish Council is supportive of adapting the NPPF to the current needs, including addressing the housing and climate crisis. Notwithstanding this, CSPPC is concerned that the proposed changes, and particularly the standard method for calculating housing need, in the absence of special circumstances to depart from it, would likely lead to a substantial increase in housing targets in Buckinghamshire, to which Chalfont St Peter has very limited capacity to absorb.
- 6.2. The changes to the protection of the Green Belt and the grey belt land considerations would also leave the door open to new inappropriate and unsustainable development in the countryside and edges of towns and villages.
- 6.3. CSPPC would request the Government to review our comments and the responses to the questions below and amend the proposed NPPF modifications to avoid unwanted consequences to our parish and ensure its social, economic and environmental sustainability in the long term.

Appendix A – Responses to consultation questions

Q1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?

No. There is not an objection to the removal of ‘advisory’ from the text, but there is serious concern with the removal of references to exceptional circumstances. The exceptional circumstances which justify to the area specific demographics and characteristics are still necessary to ensure that development is sustainable, suitable and adapted to each area.

Q2: 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?

Chalfont St Peter has not been provided with a standard method number separate to Buckinghamshire’s, being that Chalfont St Peter Parish is only a small part of Buckinghamshire. Chalfont St Peter and our local authority partners (Buckinghamshire Council, and neighbouring authorities) will need a locally derived method to correctly apportion the need within and outside the parish.

Q5: 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, design codes should be the drivers for change, especially where an increase in density of development is expected and large new communities or large allocations/extensions of towns and villages. Design codes should be in the hands of local authorities and should be ideally produced alongside Neighbourhood Development Plans and have the local community’s input.

Q6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?

Yes, but the proposed text is ambiguous and may need reviewing, as it does not express how much weight is to be given to these three: location, design and affordable housing.

Q7: 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?

No, as this change removes the existing incentives to review Local Plans and keeping them up to date. Local Planning Authorities should not be penalised if the delivery of the plan by developers and landowners is too slow, the local plan has made sufficient supply of housing.

Chalfont St Peter Parish Council supports the retention of paragraph 14 of the NPPF, as this paragraph offers a degree of protection from the presumption of sustainable development to Neighbourhood Development Plans. This is supported as these plans require significant resources and effort by local communities.

Q9: Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?

Q10: If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure??

5% is an inappropriate buffer, especially considering that the SM, as proposed, would increase housing targets dramatically in the county and there will be no scope for coping with an additional 5%.

Q12: Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

Yes. However, co-operation and strategic planning should not only lead to absorbing and interchanging housing numbers but to strengthen co-cooperation and delivery of regional-scale infrastructure, services, biodiversity and climate change mitigation and adaptation policies. Strategic planning at regional level is required and growth areas should be identified in the most sustainable locations, away from the countryside currently designated, either as Green Belt or National Parks and National Landscapes (AONBs).

Q13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

Yes.

Chapter 4. A new Standard Method for assessing housing needs

Q15: Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

No.

Q16: 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?

No. The use of any affordability accelerator results in high housing numbers in areas which are constrained by designations such as the Chilterns National Landscape or the Green Belt, which large areas of Buckinghamshire and Chalfont St Peter are. House prices and rents are high in these areas because people want to live in these areas, but supply is constrained to further the purposes for designation of the Chilterns AONB (National Landscape) and the Green Belt. Increasing the housing need numbers will not increase supply or decrease house prices, it will result in delays to plan-making whilst due to expected unmet housing needs.

Q17: Do you agree that affordability is given an appropriate weighting within the proposed standard method?

No. See question 16.

Q18: 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?

This is best answered by experts who prepare housing need modelling.

Q19: Do you have any additional comments on the proposed method for assessing housing needs?

The standard method could identify national housing targets to be met specifically in previously identified growth areas, where there are less environmental constraints (National Landscapes/AONB) and the purposes of Green Belts are not jeopardised.

Chapter 5. Brownfield, grey belt and the Green Belt

Q20: Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?

Yes, but policies should be well-worded, and this approach taken carefully to avoid the potential loss of employment space within settlements as result of a more competitive residential development for developers and landowners. The Parish Council would be concerned if this re-use of brownfield land and change of use from employment to residential use in the settlement, results in new employment areas (industrial estates, commercial areas) being developed away from the settlement in less sustainable locations or in the Green Belt. The practice of permitted development of commercial property to residential use has already and seriously reduced the amount of start-up office space within the village. The current policy is especially detrimental to small towns and villages.

Q21: 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?

No. Substantial harm would be difficult to justify in the case of piecemeal development. Furthermore, the text refers to the Green Belt' openness, but there are other characteristics and purposes of the Green Belt not mentioned in paragraph 154g, beyond its openness. Moreover, the assessment of harm to the Green Belt should not be considering the Green Belt as a whole but should identify and evaluate whether there is localised harm in a particular area of the Green Belt where this may be performing at least one of its purposes.

Q22: 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?

We don't support the expansion of the definition of PDL, as it would lead to a factual increase in the number of developable areas, at the expense of valuable land used for food production.

Q23: Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

We don't agree with the proposed definition as it is ambiguous and ineffective. The assessment of 'limited contribution' to the Green Belt purposes is not clear and solid enough as to understand what the scenarios could be. This could lead to different interpretations at development management (decision taking) stage, and subsequent appeals and court decisions having to refine the definition of grey belt land the 'limited contribution' test. It would be preferable if the NPPF better explains what the

Government understands as 'limited contributions. Ideally, the areas of grey belt land would be determined either in the Local Plan or the Neighbourhood Development Plan and there would be not space for interpreting the land's contribution to the Green Belt at decision taking stage.

The proposed definition of grey belt would not allow defining grey belt areas of designated heritage assets, but it is not clear how this would be interpreted. Would a listed building not be considered grey belt land? Would their curtilage structures too? What about their setting?

Q24: Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

The NPPF could make clear in the text releases of Green Belt in the plan-making process should be directed to Grey Belt first, and only then to poor performing Green Belt.

Q25: 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, as it would provide certainty in the assessment of what constitutes grey belt land. It would be stronger if contained in the NPPF, whilst leaving flexibility to local communities in their local plans or neighbourhood development plans to contribute towards the interpretation and designation of grey belt land.

Q26: 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?

Chalfont St Peter Parish Council is concerned that the guidance and the definition of grey belt land are not consistent. The definition refers to 'limited contribution to the five Green Belt purposes' whilst the guidance refers to grey belt land that does not 'strongly perform against any Green Belt purpose'. These are significant differences.

The guidance also seems to give more importance to purposes b and d than to purposes a, c and e.

Furthermore, the definition of grey belt land should embed a sustainable location principle, which is lacking in the text. There should be explicit reference to the completeness of neighbourhood (where green belt is a contributor to its completeness), as it releases land that benefits from and complements with sustainable transport options, jobs, housing, services, etc.

Q27: 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?

Local Nature Recovery Strategies should play an important role in identifying areas of enhancement in the Green Belt, including the retention and care of green belt corridors. However, we question how compatible this is with the likely increase amount of development in the Green Belt resulting from the revised NPPF.

Q28: 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?

No. As responded above (question 26), sustainability should be an embedded factor in the delivery of development in the Green Belt (and outside), which is not strongly stated yet in the proposed wording of the NPPF.

Q29: 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?

The proposed wording is not strong enough. Whilst we support the release of land where justified, and in particular PDL, it should not fundamentally undermine the function of the Green Belt, we consider that stating 'across the area as a whole' would limit the protection of the Green Belt through releases of land where could undermine localised areas of the Green Belt, but not the area as a whole. For instance, a gap between two villages within the Green Belt that is subject to development (filling the gap) would entail the merging of two small villages within the Green Belt but may not lead to a fundamental undermining of the Green Belt as a whole, which is mainly designated in relation to larger settlements (see London and other cities and towns). For a small village, the Green Belt is as fundamental in avoiding the merge with other settlements, as it is for the whole Green Belt to avoid the merging of settlements with the greater London urban area.

Q30: Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

Development in the Green Belt should only be allowed when it is supported and the result of allocations at the plan-making stage, either in the Local Plan or the Neighbourhood Development Plan and with extensive engagement with local communities. Paragraph 152 of the NPPF is of concern. Criteria a and b are comparable to the presumption in favour of sustainable development. But criterion c goes beyond the presumption in favour of sustainable development, and it is ambiguous on what 'development of local, regional or national importance' is. In the absence of a better definition of these terms, paragraph 152 leads to different interpretations and potentially to make land in the Green Belt open to unknown and unexpected developments.

Q31: 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?

See above responses.

Q32: 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?

In terms of traveller sites, these are considered to be inappropriate development in the Green Belt so should be treated as such. It would be appropriate for the Government to introduce new design guidance on traveller sites given that the previous guidance was withdrawn.

Q33: 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?

It seems unlikely that the need for traveller sites alone would trigger the need for a Green Belt review.

Q34: Do you agree with our proposed approach to the affordable housing tenure mix?

We support the higher affordable housing requirements in the Green Belt, as this is much needed in the parish. However, it would be preferred for local communities to identify the need and specify percentages and tenures through plan-making. A standard at national/county level may not work well and adapt to local housing need in the parish.

Q35: 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?

Yes. A higher affordable housing requirement should apply to all areas within the Green Belt.

Q36: Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

Yes, but access to green space by the public should be allowed where clearly compatible with nature conservation.

Q39: 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?

CSPPC is supportive of this approach as it should not be material if a landowner has paid too much for the land and is attempting to pass on this realised risk to the community in the form of reduced developer contributions in whatever form including affordable housing. There are clear links here to the amount of profit that is factored into a viability appraisal which should also be revisited by the Government.

Q40: 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?

National planning policy should give incentives to developers to increase affordable housing provision in PDL outside of the Green Belt in sustainable locations. These could scale down depending on whether the sites are PDL and in sustainable locations in the Green Belt, and no incentive should be available to develop only complying (not exceeding) affordable housing provision in areas within the Green Belt in unsustainable locations.

Q43: 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?

Golden rules should require from development something that would make it more appropriate in this Green Belt location. This could be in the form of provision of critical infrastructure, e.g. foul water infrastructure.

Q45: Do you have any comments on the proposed approach set out in paragraphs 31 and 32?

There do not appear to be any proposed changes to these paragraphs of the NPPF.

Chapter 6. Delivering affordable, well-designed homes and places

Q47: 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?

CSPPC is supportive of this approach. Local authorities should consider all the types and profiles of housing needs through their own assessment to understand and set out in policy their own affordable housing requirements, rates, mix, etc. Authorities should be able to reflect through policy the differences in affordable housing need in different areas within the area of the development plan.

Q48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

Yes. Local Planning Authorities are the best placed to understand local need and set out their own affordable housing requirements in response to local-specific evidence.

Q49: Do you agree with removing the minimum 25% First Homes requirement?

Yes.

Q50: Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?

CSPPC considers that First Homes, along with other affordable housing tenures, should be part of a mix of affordable tenures, never dominating the mix, therefore balancing tenures so they contribute towards the social sustainability of our community.

Q51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Yes. A diverse mix of homes (types, sizes and tenures) contributes positively towards the social sustainability of local communities and therefore CSPPC is supportive of promoting through the NPPF a mix that is representative of the housing need and responds to social needs in the area. However, CSPPC would expect any mix of tenure, type and size of homes to be informed by the area specific evidence. National mixes would not adapt to the special needs of the parish, and we would support local plans, or neighbourhood plans to identify the appropriate mix for specific areas. Local Housing Need Assessments are important pieces of evidence that should inform housing mix: types, sizes and tenures.

Q52: What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?

Through clear and sound national and local planning policies that clearly set out requirement that must be adhered to in terms of affordable housing provision. This would help local authorities, so land values do not rise due to developers and landowners' expectations of being able to negotiate lower levels of affordable housing.

Q53: 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?

There should be mechanisms to avoid large-scale developments of affordable housing for those in urgent need, as this may result in social problems and ghettos. The aspiration of any affordable housing strategy and policy should be to enable a more balanced social mix.

Q55: Do you agree with the changes proposed to paragraph 63 of the existing NPPF?

Yes.

Q56: Do you agree with these changes?

Yes. Community-led housing should be supported, although there would be very limited scope for new CLT developments in our parish and these normally take a long time until brought forward.

Q57: 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?

CSPPC considers that the definition should be amended to include a separate category for social rent. Affordable tenures should be linked to average local incomes, rather than a percentage of the housing market price. 80% of the market price in Buckinghamshire, especially in areas well-connected to central London, as Chalfont St Peter, is still over £1,700pcm for a 2-bedroom flat and not 'affordable' to most people on average incomes.

We also consider that the management of social and affordable rent homes should open to other organisations beyond Registered Providers, such as Community Land Trusts, Rural Estates and other institutions that can manage housing with adequate safeguards in place to control rent levels and the allocation of housing.

Q59: 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. The term 'beautiful' could be subjectively interpreted and well-designed buildings and places is an adequate terminology to secure high-quality developments through planning.

Q60: Do you agree with proposed changes to policy for upwards extensions?

Yes. The previous emphasis on mansard roofs was excessive and the proposed wording is adequate. CSPPC supports upward extensions albeit they should be in-keeping with

the character of the host buildings and the wider area. We are satisfied that the wording of proposed new paragraph 122 states appropriate conditions to upward extensions.

Chapter 7. Building infrastructure to grow the economy

Q62: Do you agree with the changes proposed to paragraph 86 b) and 87 of the existing NPPF?

Yes, provided that most of these industries and commercial development would not be appropriate in National Landscapes and within the Green Belt.

Chapter 8. Delivering community needs

Q67: Do you agree with the changes proposed to paragraph 100 of the existing NPPF?

Yes.

Q68: Do you agree with the changes proposed to paragraph 99 of the existing NPPF?

Yes.

Q69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

Yes.

Q70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

By supporting the location of new development only where adequate active travel options are available or where these could be upgraded or created to ensure that new residents would make use of active travel infrastructure. This should be a key element of the vision led approach to transport and evidenced through a robust infrastructure delivery plan (IDP).

[End of questionnaire]