

Planning for the future – Planning white paper

Councillor Iain Eadie, Cabinet Member for Visitor Economy & Local Plan / Cllr Angela Lax Cabinet Member for Regulatory, Housing and Health Services



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Key	No
Decision?	
Local Ward	All
Members	

Cabinet

1. Executive Summary

- 1.1 The government published a '[Planning for the future](#)' white paper in August 2020 for consultation. The document sets out the government's proposals to reform the planning system in England. The government states that the range of proposals are designed to 'streamline and modernise the planning process, improve outcomes on design and sustainability, reform developer contributions and ensure more land is available for development where it is needed'.
- 1.2 The proposals relate to plan-making, the determination of planning applications (decision-making), the design of development and developer contributions. Consultation on the White Paper will last for 12 weeks and closes on 29 October 2020. The District Council have considered the white paper in detail and are seeking provide a comprehensive response to the consultation. This response follows consideration by members and officers during the consultation period.
- 1.3 It is proposed that a formal response to the consultation is submitted before the closing date of 29 October 2020 and is based upon the consideration as described above and based upon the key themes and issues identified as a result of this at **Appendix A**.

2. Recommendations

- 2.1 That the Cabinet note the contents of this report including the key themes and issues which have been identified and are set out at **Appendix A** and that these, along with input from the Councils officers form the basis of a formal response to the white paper consultation.
- 2.2 That the Cabinet be requested to delegate authority to allow the final response to the white paper consultation to be agreed for submission by the Head of Economic Growth & Development in consultation with the Cabinet member for Visitor Economy & Local Plan and Cabinet Member for Regulatory, Housing and Health Services.

3. Background

- 3.1 The government published a '[Planning for the future](#)' white paper on 6 August 2020 for a twelve week consultation. The document sets out the government's proposals to reform the planning system in England aiming to "*streamline and modernise the planning process, bring a new focus to design and sustainability, improve the system of developer contributions to infrastructure, and ensure more land is available for development where it is needed*".

- 3.2 The consultation on the 'Planning for the future' white paper will run until the 29th October 2020 and alongside a narrative includes 26 specific questions which the government are seeking response to. Officers will continue to consider the white paper and prepare a response to the consultation.
- 3.3 The white paper proposes a wide range of reforms, these can mainly be grouped into four categories, relating to local plan making, decision taking on planning applications; developer contributions and design. The proposals for each of these areas are summarised below:

Local Plans:

- 3.4 The white paper proposes a range of reforms to the nature of local plans and plan-making process. These changes seek to simplify local plans and speed up the process involved in preparing them. The first key reform proposed is to simplify the role of the local plan to focus on identifying land under three categories or delineated zones:
- Growth areas - would be zones which are considered to be suitable for substantial development¹. Growth areas would be used to define land for comprehensive development including urban extensions, new settlements and areas for redevelopment (including brownfield land) and regeneration sites. Outline planning permission for the principle of development would be automatically granted for development types within growth areas as specified within the local plan;
 - Renewal areas – areas considered to be suitable for development. This would include existing built up areas where smaller scale development would be considered appropriate. The category would include *“the gentle densification and infill of residential areas, development in town centres, and development in rural areas that is not annotated as Growth or Protected areas, such as small sites within or on the edge of villages”*. In renewal areas there would be a statutory presumption in favour of development being granted for the uses specified as being suitable in each renewal area². It would be for the local plan to specify these uses; and
 - Protected areas – sites and areas that as a result of their environmental and/or cultural characteristics would be protected and have more stringent development controls should planning applications be submitted. The white paper states that this would include for example; Areas of Outstanding Natural Beauty (AONBs); Green Belt; Local Wildlife Sites; areas susceptible to significant flood risk; other important green spaces and open countryside which is not designated as either a growth or renewal area (see above). Some of these areas would be designated nationally, with others to be designated through the local plan.
- 3.5 The white paper states that these new-style local plans would comprise an 'interactive web-based map' of the council's administrative area where data and policies are easily searchable with a clear key colour coded in line with the three zones. Accompanying text would set out the appropriate development uses and any limitations to that development (for example restrictions on height/density). Local plans, the white paper suggests, should be published as standardised data to enable a strategic national planning map to be created showing all local policies across England.
- 3.6 The second major proposed reform is that policies for development management within a local plan would be restricted to those required to define the respective areas or site specific requirements for the categories described at paragraph 3.4 of this report. The white paper states that the National Planning

¹ The white paper states that the term substantial would be defined in policy through the reforms to ensure to remove debate over its definition.

² Planning permission for other uses could still be granted within growth and renewal areas but this would be subject to a different type of application which would consider the principal of development.

Policy Framework would become the primary source of policies for development management. This the government suggests would change local plans from 'long lists of general policies to specific development standards'.

- 3.7 A new standard method for establishing housing requirement figures in Local Plans is proposed within the white paper which would replace the current standard method which is used to establish Local Housing Need (LHN). The white paper states that the new approach would be binding in order to 'drive greater land release' to ensure the government's target of 300,000 new homes annually in England can be met. This new approach would have regard to;
- The size of existing urban settlements;
 - The affordability of places;
 - The extent of land constraints that exist;
 - Opportunities to better use existing brownfield land;
 - The need to make allowance for other forms of development (non-residential) and;
 - The inclusion of an appropriate buffer to account for the non-implementation of permissions and providing sufficient choice to the market.

As part of this approach local planning authorities would still have flexibility as to where homes are delivered to meet their requirements including utilising the categories described at paragraph 3.5 of this report. Additionally, it is proposed that the 'five-year housing land supply' test is removed with the Housing Delivery Test (HDT) remaining as the key test to assess delivery for authorities.

- 3.8 The white paper also proposes the abolishment of the 'tests of soundness' which local plans are currently examined against. This would be replaced by a single 'statutory sustainable development' test which would consider whether a local plan contributes to achieving sustainable development in accordance with policy issued by the Secretary of State. A simplified examination procedure based on the aforementioned test along with the more streamlined content of local plans should reduce delay in the plan-making process the white paper argues. Indeed the white paper goes further and suggests that local plans under the reformed planning system should be prepared in a 30 month statutory time frame.
- 3.10 In respect of the changes to local plans and the plan-making process this will represent a significant change from the current approach. The move to a 'zoned' system with the three designations as described at paragraph 3.4 could lead to an overly simplified approach which does not take account of the diverse nature of areas of the District. The white paper also proposes to limit the use of localised development management policies, with the primary source of such policies becoming the National Planning Policy Framework. Whilst such an approach may be beneficial to the development industry who would be effectively dealing with the same nationally set policies across the country it doesn't allow for locally distinctive development management policies to be drawn up and adopted by the Council. These two proposals together appear overly simplistic and remove the ability for the authority to draw up nuanced and detailed locally specific allocations and policies.
- 3.11 The white paper proposes a new standardised method to calculating housing need which would be binding for authorities. There is limited detail as to how housing need would be calculated using the new method so it is not possible to determine what impact this would have for the District in terms of its housing need. However, by setting this approach nationally and making it binding there is concern that this may lead to an approach which does not allow for the reflection of local characteristics and constraints. Alongside this approach the abolition of the five year supply test and reliance on the HDT is worthy of consideration. The HDT tests an authority's housing delivery in terms of annual completions rather than the number of homes it has permitted. Given the Council is not responsible for the actual delivery of homes there is the potential that should the development community not implement consented schemes in a timely fashion that the local planning authority is at risk of being punished through the HDT.

- 3.12 The white paper is relatively limited in terms of its detail around the role of neighbourhood plans in the new planning system. Neighbourhood plans are proposed to be retained as part of the reformed planning system, however the white paper suggests the content of neighbourhood plans should be more focused in a similar way to the proposals for local plans. The lack of detail in the white paper is an area of concern given the large number of neighbourhood plans which have been, and continue to be, advanced within the District.
- 3.13 Proposals to streamline the examination process for local plans are welcomed. There is a lack of detail within the white paper as to how the new approach and the 'sustainable development test' would work in practice. However, an approach which reduces the cost and delay in the plan making process would be beneficial for the Council.
- 3.14 The white paper suggests that public engagement in the planning system should be 'front-loaded' to the plan-making stage and that the proposals for simplifying the local plan process and making this more accessible digitally will encourage this. The proposals would include two opportunities for public engagement in the local plan process, this is broadly similar to the current system. It should be noted that Lichfield District Council has incorporated a number of additional and non-statutory consultations on its local plan to ensure wider engagement. The white paper suggest that by encouraging public engagement at the plan-making stage (both local and neighbourhood plans) and on design codes (see design section below within this report) that the need for public engagement at the planning application stage will be reduced, thus speeding up the determination of planning applications. However, such a proposal could result in a decrease in local scrutiny of planning applications which ultimately will determine the more precise detail of development. It is important to ensure the local people and other stakeholders are afforded an opportunity to be consulted upon individual applications alongside seeking to increase engagement at the plan-making stage.

Development management:

- 3.15 Alongside changes to local plan and how they are prepared the 'Planning for the future' white paper proposes a range of reforms relating to the development management process. Much like the reforms to local plans, these are proposed in order to 'streamline' the planning process.
- 3.16 As discussed at paragraph 3.4 of this report the white paper proposes that automatic outline consent be granted for development in defined growth and renewal areas as detailed in the new-style local plans. Full consent would therefore be granted through routes which should offer a more 'streamlined and faster' route to consent. These routes would be:
- A "reformed reserved matters process for agreeing the issues that remain outstanding"; and
 - A "local development order (LDO) prepared by the local planning authority for the development which could be prepared in parallel with the local plan and be linked to a master plan and design codes". LDOs grant planning permission upfront for specific types of development in a defined area. The white paper seeks greater use of LDO's by authorities.
- 3.17 The white paper says the government wants to see "a much more streamlined and digitally enabled end to end process which is proportionate to the scale and nature of the development proposed, to ensure decisions are made faster". In respect of determining planning applications the white paper proposes an approach where the well-established eight and thirteen week determination timescales which exists become 'firm' deadlines with penalties imposed on local planning authorities when deadlines are missed. To achieve this the white paper proposes:

- A 'clear incentive' for authorities to determine applications within the statutory time limits which could involve the refunding of planning fees where timescales are missed and whether some types of application should be deemed to have been granted permission if there has not been a timely determination;
- 'Shorter and more standardised' applications are proposed where the amount of information required for an application is reduced and greater standardisation of technical supporting information (for example heritage, highways or flooding matters) is introduced. Such an approach could include a national data standard for smaller planning applications and/or the digitisation of validation checklists so that the right information is provided as part of an application at the start of the process;
- The white paper also proposes the delegation of detailed planning decisions to planning officers where the principal of development has already been established (for example through the new local plan approach); and
- The strengthening of enforcement powers are also proposed with the white paper saying the government want to see local planning authorities placing greater emphasis on the enforcement of planning standards and decisions. The white paper states that the government intend to review and strengthen existing enforcement powers and sanctions available to authorities to ensure they support the new planning system including consideration of higher fines through the courts.

3.18 The white paper's proposal to penalise local planning authorities when determination timescales are not met by refunding application fees is a concern. The white paper makes the case that presently extensions of time are too often agreed between applicants and local planning authorities, leading to delays in determination. Such extensions of time are often necessary to ensure the appropriate information has been submitted and sufficient opportunity for all stakeholders to consider this information is provided. It is concerning that by arbitrarily focusing on timescales could lead to less clear and rushed decision-making and a potential reduction in the quality of decisions.

3.19 As noted at paragraph 3.10 a concern is that the proposed changes will lead to a simplistic system which lacks locally distinctive policies upon which planning applications are determined. Additionally, the proposals would also seek the delegation of a wide range of planning applications to officers where the principal of development has been established through a council's local plan. This risks removing scrutiny of those applications by local authorities planning committees and elected members, thereby potentially removing a degree of local democracy from the development management process. When this is coupled with the approach to provide nationally set development management policies there is a risk of significantly curtailing the decision-making ability of a local planning authority, and its consideration of locally important and specific issues in the planning process.

Developer contributions:

3.20 The white paper proposes to reform the current approach to developer contributions which primarily consists of the Community Infrastructure Levy (CIL) and other obligations which are usually achieved through Section 106 agreements (S106). These approaches would be replaced by a nationally set 'value-based flat rate charge' to be known as the 'Infrastructure Levy'. The levy would be either a single rate across the country or a series of area-specific rates which would be set nationally and chargeable on developments which exceed a nationally set threshold. The 'value-based' charge would be based on the final value of a development which it is proposed would be more effective in capturing increases in value and be sensitive to economic fluctuations. It should be noted that at present the white paper does not define the threshold at which it would be applied. There is limited information within the white paper as to how the Infrastructure Levy is proposed to be calculated. Should the approach capture and interact with land values it is considered important to ensure that local land values are used rather than a value set nationally. Using local land values would ensure that the levy is responsive to local characteristics

and the market to ensure that the levy received from development within the District is as much as viably possible. As detail emerges on the infrastructure levy in the future it will be important for the District Council to continue to respond to such consultations. A nationally set infrastructure levy should not inhibit the ability of local planning authorities to deliver development in locations in line with its local plan.

- 3.21 The white paper suggests that this new national levy will aim to raise more revenue than the current approach and ‘at least as much –if not more’ provision of on-site affordable homes. It is proposed that affordable homes would be delivered ‘in-kind’ on a development site with the value of the provision being taken into account in the calculation of the Infrastructure Levy for the site.
- 3.22 It is proposed that the reformed approach to developer contributions will provide greater freedom and flexibility to local planning authorities on how they wish to spend any monies accrued through the infrastructure levy. In addition it is proposed that a ‘neighbourhood share’ of monies collected would be transferred to Parish Councils for them to spend on priorities in their areas. This approach mirrors that currently in place with CIL.
- 3.23 The proposal to simplify the current approach to developer contributions and provide greater transparency could potentially bring benefits. Presently, the use of S106 agreements and CIL can be time consuming and open to negotiation and challenge, indeed in the District the agreement of S106’s has led to delays in bringing forward development. A clearer approach which removes some of these difficulties would potentially be welcomed. However, there is a lack of detail within the white paper in respect of how the national ‘Infrastructure Levy’ will be calculated and what this could mean for authorities. It is not possible, with the detail provided, to determine whether the new approach to developer contributions would deliver more infrastructure, affordable homes and other obligations compared with that of the current system.
- 3.24 The paper suggest the levy would generate at least the same level or more on-site affordable homes, without sufficient detail there is some concern as to how the levy would impact provision of affordable homes and other developer contributions. The white paper suggests the on-site provision would be delivered ‘in-kind’ with the value potentially taken away from the infrastructure levy as such there is a concern that this could lead to less ‘obligations’ being achieved. As noted above the lack of detail on the new approach however makes it difficult to determine exactly what impacts the proposed reforms would have in terms of the obligations the Council could seek.

Design

- 3.25 Another key aspect of the reforms proposed by ‘Planning for the future’ relate to the design of new development and the government aspiration of creating ‘beautiful and sustainable places’. The white paper states that following the publication in October 2019 of the [National Design Guide](#) this will be supplemented by a National Model Design Code which will be published in the autumn of 2020 setting out detailed parameters for development in different locations and a revised Manual for Streets thereafter. The government expects this national guidance to have a direct bearing on the design of new development.
- 3.26 Alongside this government will expect design guides and codes to be prepared locally with community input to reflect the diverse character of places across the country. Part of this proposal is to ensure that any such guides and/or codes are prepared with effective input from the local community and consider evidence of what is popular and characteristic to the area. Only where this has been demonstrated will local design guides or codes be given weight in the planning system. The white paper envisages such guides and/or codes to be progressed in one of three ways:

- By local planning authorities to supplement their local plans and add a visual element to the 'categories' which have been designated in the local plan;
- Through the work of neighbourhood planning groups; and
- By applicants when bringing forward proposals.

3.27 The white paper also proposes a 'fast-track for beauty' approach which is designed to incentivise and accelerate high quality developments which reflect local character and preferences. This will be achieved in three ways:

- Revised national policy will make clear that proposals which comply with local design codes and guides will have a greater certainty about their prospects of a swift approval;
- Masterplans and design codes will be required as a condition of the local plan when designated 'growth areas'. These could be prepared alongside or subsequent to the local plan and will provide detail as to the expectations on development prior to this coming forward; and
- Production of 'pattern books' for 'renewal areas' which will allow the pre-approval through changes to permitted development rights of popular and replicable design.

3.28 The focus on design and the desire to 'build beautiful' within the white paper is to be welcomed. However, as with many of the proposals there is an emphasis on determining what is considered to be good design at a national level through the use of the National Design Guide and forthcoming design code. It is noted however that this section of the white paper does then make further reference to the need for local planning authorities, working with their communities including neighbourhood planning groups, to define more localised design codes for their areas. This is to be welcomed.

3.29 The white paper proposals for better design include an aspiration to focus on delivering better energy efficiency in development. This is something the Council is supportive of and continue to seek to deliver increased energy efficiency through the policies within the adopted Local Plan. However, it is considered important to recognise that such issues should be locally determined rather than set at a national level. This will ensure the Council is able to consider its own energy efficiency standards, with links to viability, and seek to enshrine this in its policies.

Resource implications:

3.30 In respect of funding the new system the white paper suggests that this should be principally paid for by the 'beneficiaries of planning gain – land owners and developers'. Whilst this would appear to be a positive, the white paper then continues to state that the costs of development management activities should be covered by planning application fees which should continue to be set nationally. This does not allow for local fee setting which could be used to ensure the full costs of the planning system are met by those who gain from it. Enabling authorities to set planning fees would help to ensure that the full costs of planning for the area are met. The white paper goes further and also states that the national setting of fees should also include greater regulation of discretionary pre-application charging to ensure 'it is fair and proportionate'. As members will be aware the Council currently charges for pre-application requests and any regulation introduced nationally which could put this at risk would be a concern. The white paper further states that 'some local planning activities should still be funded through general taxation given the public benefits from good planning'. Such statements coupled with the proposed approaches to fee setting would seem to limit the ability for the council to increase its revenue to fund its statutory planning services.

3.31 The white paper proposes as part of its reforms relating to the implementation of the new planning system is for each local authority to have a 'chief officer for design and place-making'. The white paper envisages that this role will support the transition into the new planning system with their colleagues in a council's planning teams. Alongside this the white paper recognises that with the implementation of a

new planning system there will be a need to ensure appropriate training is made available to planning professionals. There is limited information within the white paper as to how and when such training would be made available. Presently the Council is well placed with its planning teams including Development Management, Spatial Policy and specialisms such as urban design, ecology and arboriculture which would have experience and transferable skills to adapt to the new planning system. Additionally the white paper's proposals for greater use of technology throughout the planning system will likely require the procurement of new IT systems and the training and resources to utilise these. As noted previously there is limited information within the white paper as to how this will be delivered. Local Planning Authorities will require support from government to procure and deliver such systems should the proposals be introduced.

Concluding remarks:

- 3.32 As a whole the reforms proposed in the housing white paper are clearly significant and would represent a considerable change in the planning process for the Authority. There is though a lack of detail around many of the proposals within the white paper, something the paper itself acknowledges and suggests will be 'fleshed out' in the future as the reforms are considered further. However, this lack of detail does make responding to the Government's consultation more challenging. The Council will assess these details once these become available and respond to any further consultations issued by the government.
- 3.33 Throughout the white paper the government continues to advance the view that the planning system is responsible for delaying development and for the number of homes being built nationally not meeting government targets. This fails to recognise that a key issue in bringing forward development is the development industries failure to deliver consented schemes. Whilst in Lichfield District there is a relatively low level of planning permission not being implemented nationally we see that a large number of consented homes are not built. The white paper continues with the narrative that by allocating more land for growth this will drive housing completions without recognising the need to deliver changes which encourage those with extant planning permissions to implement consented schemes.
- 3.34 The white paper itself does not detail the timescales within which the reforms, if progressed, would take place. It does state that subject to the responses to the consultation the intention is to make 'rapid progress toward this new planning system' with legislation to be brought forward to implement the reforms. The white paper makes clear that should the proposed planning reforms come into fruition that there would need to be transitional arrangements which ensure that recently approved plans, existing permissions and any associated planning obligations can continue to be implemented as intended. Whilst the exact timescales of implementation are unclear the white paper states that to support the transition into the new system authorities will be statutorily required to have an adopted local plan (under the new planning system) within 30 months from the legislation being brought into force or 42 months for local planning authorities who have already adopted a local plan or submitted one for examination. In such circumstances this means having an adopted Local Plan would provide more certainty in decision taking while the legislative reforms are going through the system. Also, it means that once legislation comes into force, Lichfield will be likely to benefit from the 42-month grace period (3.5 years).
- 3.35 A concern overall with the proposals is that there appears to be a move away from 'localism' and local decision making to more centralised control. A number of the proposals (see the local plan and development management sections of this report in particular) appear to take decisions away from local plan authorities and pitch them at a national level. Such an approach does not take account of the great differences in administrative areas across the country and indeed the very differing characteristics and issues we find within our own District. There is a risk that such an approach which reduces the role of local planning authorities in both plan-making and decision-taking will make it harder for authorities to reflect local needs and issues within their plans and decisions.

Responding to the consultation

3.36 The initial consideration of the white paper and its proposals (set out from paragraphs 3.1 to 3.35) was presented to members at Economic Growth, Environment and Development Overview & Scrutiny committee on [6 September 2020](#). At that meeting Members were asked to provide comment and thoughts on the white paper to inform the Council’s response to the consultation. The issues and themes which were discussed have been summarised below and set out in greater detail at **Appendix A**.

- Proposals are a centralising approach which will lead to a loss of local democracy and accountability on planning matters;
- The white paper does not address the issue that developers do not always implement consented developments and continues to seek to penalise local planning authorities where housing delivery is below requirements.
- Concern that white paper proposals will hinder the delivery of affordable homes and infrastructure.
- Not allowing local authorities to set their own planning charges;

3.37 As set out at paragraph 3.2 of this report the governments consultation on the white paper will conclude on 29 October 2020 with all responses being required to be submitted by that time. The consultation itself consists of 26 questions.

3.38 It is recommended that delegated authority be granted to the Cabinet Member for Visitor Economy & Local Plan, Cabinet Member for Regulatory, Housing and Health Services and Head of Economic Growth and Development to agree the final consultation response to the 26 questions prior to the submission of the response.

Alternative Options	1. None – the report is for informational purposes.
Consultation	<ol style="list-style-type: none"> 1. Report on the planning white paper was presented to Economic Growth, Environment and Development Overview & Scrutiny Committee in September 2020. Members were asked to provide comment at the meeting to inform the consultation response. 2. The planning white paper is currently the subject of a consultation.
Financial Implications	<ol style="list-style-type: none"> 1. There are no financial implications from this report which details the proposed response to the government consultation. 2. The planning reforms proposed within the white paper, if enacted, would give rise to financial implications in terms of the financial obligations from development which could be set nationally and financial implications for the authority in terms of meeting the requirements of any new/changed planning system.
Contribution to the Delivery of the Strategic Plan	1. Supports the shaping place and developing prosperity branches of the strategic plan.
Equality, Diversity and Human Rights Implications	1. Not required.

Crime & Safety Issues	1. None.
Environmental Impact	1. There are no specific environmental issues arising from this report.
GDPR / Privacy Impact Assessment	1. Not required.

	Risk Description	How We Manage It	Severity of Risk (RYG)
A	White paper proposals may reduce local planning authority's role in planning and decision making. Proposals propose a centralised approach which would reduce local influences on plan making.	Response to consultation to make clear views on proposals which reduce role of local planning authority.	Y

Background documents <ol style="list-style-type: none"> Planning for the Future – White Paper (August 2020) National Design Guide
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Relevant web links Planning for the future - https://www.gov.uk/government/consultations/planning-for-the-future
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Appendix A: Key issues identified through member engagement

The following key themes and issues were identified following discussion from members at Overview & Scrutiny committee in September 2020 following the presentation of a report on the 'Planning for the Future' white paper. Such issues are to be included within the formal response to the government's consultation against the most appropriate question within the consultation.

Key issue/theme

The white paper is a significant step away from the principles of 'localism' and 'devolution' which the government has previously supported. The proposals represent an approach which will reduce the role of local planning authorities and elected members in the planning process with many issues being set at a national level. This reduces the Council's ability to influence planning matters through the proposals to reduce the role of planning committees, proposed establishment national policies for development management and 'simplification' of the local plan process.

There is an overall lack of detail within the white paper around a number of the proposals, for example its approach to the proposed infrastructure levy and affordable housing provision. The lack of detail makes it very difficult to formalise full views on some of the proposals.

Local Authorities should be able to set their own planning charges to ensure the cost of processing planning applications is fully met but those submitting them.

Concern that proposals relating to the 'Infrastructure Levy' and planning obligations are unclear and will lead to a decrease in the levels of infrastructure and obligations provided from development. This concern is echoed in the delivery of affordable homes.

The white paper continues the government's assertion that local planning authorities should be penalised when housing delivery falls below requirements. This does not recognise that local authorities do not deliver new homes (or may only deliver a limited number of new homes) nor address the issue that housebuilders and developers 'sit' on planning permissions and do not always implemented consented schemes in a timely manner, waiting until the market would provide for its highest profit. It was recommended that there should be penalties for housebuilders where permissions are not implemented this could include for example loss of the permission or an increase in the infrastructure levy/planning obligations agreed.

Simplification of the planning system is welcomed and can be a good thing. However, there is concern that by overly simplifying the system local accountability will be lost.

Speeding up of the planning application process is supported, and performance targets for this are not something the authority should be afraid of. However, it is important to ensure that any new process enables the Council to take the appropriate time to consider planning applications and not 'rush' decisions as this could cause a reduction in the quality of decisions. The proposal to pay back planning application fees is not an 'incentive' and may cause authorities to make errors or rush through applications.

Concern that the white paper proposals along with changes to permitted development rights could lead to the delivery of poor quality and sub-standard homes.

The proposed 'zones' approach could be overly simplistic and not allow for local distinctiveness, although an approach which simplifies and creates better public understanding and access the information is

supported. It is suggested that multiple zones within the three zones or more clear guidance's as to what can be specific within each zone is provided to enable more local distinction.

Concern that the proposals could affect the progression of the District's local plan and would reduce the role of neighbourhood plans in the planning system. There was some suggestion that the 30 month time limit on the development of local plans would not be achievable.

Supportive of the proposals which could deliver a more 'objective' approach to planning. Presently we do not build enough homes in the country and an objective system could assist with this. This would remove subjective objections which can be based on people not wanting building close to them. An approach which standardises and simplifies planning will increase house building.