



# Windlesham Parish Council

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PLANNING FOR THE FUTURE  
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## Response from Windlesham Parish Council

The voice, opinions and reaction of local communities to development and growth have been subject to an incremental diminution of relevance over recent years and the planning system has been devalued as a consequence.

It is acknowledged that local opinion can often be biased and protectionist, but communities accept the need for change and growth; it is the form and manner of that growth and how it is accommodated which has for a long time been the source of contention. It must be recognised that having accepted the need for growth, a community should be entrusted in ensuring development provided is of the correct form, in the correct place, at the correct time. It should not be a case of decisions taken remotely, or in isolation from all material considerations.

Most importantly it should not be determined by the whim of developers, working to deliver profit, and dictating how and when a community should evolve in response solely to an option it has secured, or a form of development it wishes to sell.

Local need is so often used to justify development yet following consent that need is forgotten and the local community “for whom the need is being addressed” has little or no say in the matter.

### SUMMARY

The response of Windlesham Parish Council to the White Paper on reform of the Planning System may be summarised as:

- Support in principle for a review
- Dissatisfaction at current system ignoring local views and opinions, with greater weight being afforded to developers who fail to deliver
- The new planning system must require growth related development to be undertaken differently; the current method of house building is broken in terms of meeting need; it serves only the interest of the developer.

- The need to build more housing is accepted – the question unanswered by the consultation is how the new system will deliver the right housing, affordable, in the right location, at the right time.
- The consultation continues to place an unreasonable reliance on house builders meeting the needs of wider communities and failing to acknowledge developers will provide what they determine to be required (saleable) on sites they have acquired (not the most sustainable, suitable or community acceptable sites)
  - While housing need is readily acknowledged, the consultation fails to provide sufficient comfort to the repeated community question, who needs the specific development proposed by a developer and why is the site chosen the most appropriate to meet that need? Why is there a specific need for a site to be developed and why in the form proposed? What are the alternatives and have these been explored (a role of the new local plan)?
  - Concern the proposed system will continue to favour developers and encourage development decisions to be taken remotely from the communities into which that development must be accommodated
  - Very significant doubt the vision of the White Paper can be delivered without considerable detail of the management and systems to be employed
  - Lack of clarity on how and when essential detail will be made available and how the Parish will be able to participate
  - Lack of recognition of the important role local parish councils can play in providing local knowledge and experience in decision making
  - A lack of evidence as to how the democratic process will be upheld, and the roles for elected members and community representatives
  - Concern that development historically has not been delivered as anticipated or as appropriate for the location and no evidence to indicate this position will change
  - Support for a binding local plan providing greater local certainty for investment, development, confidence and understanding
  - Local plan allocations to be supported by binding policies and design codes (changed only at times of local plan review)
  - Enforceable local plans are supported, providing these have a sound evidence base and include local knowledge and advice
  - Permission in principle for compliance with local plan and accompanying design codes is supported in principle, but all requirements of local plans must be enforceable
  - Planning permission (or permission in principle) justified on delivering housing need must be subject to an obligation for implementation (to a set percentage of the development approved) within set timescales or permission revoked without compensation)
  - Housing need to comprise two components; a local requirement (prioritised) and a strategic element (shared between neighbouring authorities)
  - To ensure right houses are provided timely in the right place requires more grain in the assessment than simple mathematics; housing need for local plan areas to contain a capacity component (the ability of an area or sub-areas to accommodate new development without harm to long term sustainability, social and environmental interests). It should not be left to developers to decide what is 'appropriate for an area' – local input is essential for community 'buy-in.'
  - Housing requirement to be monitored against a trajectory of delivery not a simple mathematical calculation

- Local housing to be defined by local evidence base and sites identified specifically for strict provision
- The strategic housing element of any local plan housing requirement to be agreed cross border between authorities on the basis of capacity (physical and infrastructure)
- Planning constraints to be reassessed and weighted at a local level as well as national importance as a first stage of local plan preparation
- Local communities and their representatives (Parish Councils) to have a key role in assessing alternative options for new development locations
- The vision of the White Paper will only be achieved with a change to the way housing is provided.
- Renewal should be a growth priority, taking preference over the release of greenfield sites, which should be exceptional and strategic in nature and scope; smaller adjunct estates should be rejected
- Embracing technology to provide explanation and understanding is supported. However., the consultation does not explain how the technology will allow local interests and knowledge to be harvested.
- Planning is a multi-faceted activity and a powerful tool for growth but the consultation fails to acknowledge this. The review of the planning system must also be co-ordinated with other legislative review to ensure there is a joined-up national framework of vision and delivery. The opportunity for differing areas of legislation to pull in different directions must be removed.
- Clarity is required about the proposed areas of Growth, Renewal and Protection. What do these 'zones' actually mean; how are they to be defined and by whom; how are they to be managed and how are conflicting objectives to be reconciled?
- The principle of a local plan being sustainability proofed and negating the need for subsequent applications to be similarly proofed individually must be a benefit. However, what confidence can the public have that development will be fully sustainable, without detail of how this is to be achieved and what criteria and methodology is to be applied.
- The Parish believes Local Plan preparation can be speeded up and there should be penalties for those authorities who do not deliver (or in due course review) a meaningful plan on time. The first new plan must be robust and it must be assured that its evidence base is accurate and comprehensive. It is requested that extra time is afforded to the first production to ensure it forms a solid base on which to plan for the future. Transitional arrangements are equally important and the Parish would wish to see the new principles brought forward to ensure developers do not seek to impose large numbers of poor developments before the new regime takes effect.
- Support for the removal of the failed 'duty to cooperate' but a recognised importance to plan strategically to reflect modern lifestyles and expected changes which will require cross border cooperation
- Better explanation of how the removal of CIL and s106 obligations (accepting s106 will remain for site specific, non-financial requirements) will affect the delivery of much need local facilities and benefits, particularly those required as a result of the approved development. The principal of subdividing major sites between developers to implement must not diminish responsibility to provide wider communal benefits and infrastructure approval.
- Planning after the White Paper must be truly integrated as part of a National Infrastructure Plan.

- The new system must be clear and precise as to the outcomes it seeks and how these are to be measured for success.
- The need to respond positively to climate change must be given a higher recognition than currently in the White Paper and it must be the responsibility of any local plan to explain fully the targets set for responding to climate change and impose enforceable requirements on all new developments.
- The White Paper broadcasts the need for wider community engagement and allowing planning to reach the people. Apart from suggesting technology is used to better reach the public, there is very little if any clarity of the weight to be given to public comment and views; how the extensive knowledge and experience of the public can be best put to use; and how the public and democratic process will be brought to bear on decision making.
- Involvement of the community at local plan making stage is essential but the community should also have an equal say and some jurisdiction over the proposal which come forward in compliance or at deviance from the local plan.
- The new system must look at elements of the planning system, including all regulations, orders and statutory instruments. All elements must work in harmony and not as at present, in a disjointed incremental manner. Permitted developments rights should be completely reviewed and linked directly to local requirements through local plans (PD rights for urban areas are not applicable equally to rural areas and vice versa).

## 1 General Comment

1.1 Windlesham Parish Council supports the Government's review of the English Planning System as it has become increasingly frustrated in recent years with regard the diminishing role of local democracy in planning decision making. The council, alongside many other Parishes and many members of local communities up and down the country, has seen the role of local communities, and the considerable knowledge they bring to planning decisions, disregarded as developers appear to be given an ever-increasing advantage in promoting development. Whether or not the promoted development is required, is appropriate, suitable, affordable or sustainable, the increased use of appeals appears to place any housing provision, anywhere as the key planning decision determinant.

1.2 The Parish acknowledges the requirement to provide new housing to meet the needs of local populations and the failure of some local planning authorities to ensure local plans are kept up to date and provide a five-year housing land supply. This situation must change and we must have a planning system capable of responding to the way we live today (Covid and on-going climate change are major demonstrators that we cannot continue to live, work and play as we have to date), if we are to tackle the real problems existing and likely to arise within all aspects of society.

1.3 Growth is essential and the planning system, with its over-seeing and co-ordinating role between competing pressures and interests, is best placed to deliver that growth. A review of the current system to speed up decision making, provide greater certainty for investors and communities through the definition of development and non-development areas, and provide greater clarity and technological assistance to understanding and contribution is to be welcomed.

1.4 More than ever the needs of local communities at a local level, feeding into the decision-making process, is essential. How else can the right houses (or development growth), in the right location at the right price and at the right time, ever be delivered if the process is left primarily to volume houses-builders pursuing simple market objectives? There is a very real concern that even with a new planning process, in the absence of any changed requirement of the housing sector, the current situation will perpetuate. There might be some increase in the number of houses built if planning permission is more easily obtained, but the right development in the right place is much more difficult to deliver.

1.5 In principle a development identified through a local plan and controlled by allocated policies and design codes should deliver what is required, but there can be no confidence in this approach if the detail of how this is to be used and enforced is not known. The Parish is all too aware of how easily development promises are set aside and good intentions and principles not followed through once a planning permission is obtained

1.6 Windlesham Parish Council believes strongly local communities, whom they, and others like them, represent, should have a positive say in the scope, form and location of new housing. The scale of development may be from a strategic need base but must contain a very clear local need element. Development locations selected must be on grounds of their suitability to accommodate new housing to benefit the local community in a sustainable way first, and thereafter make provision for strategic need if constraints and infrastructure allow.

1.7 The approach as we have seen increasingly in recent years, is housing delivered through a housing market on sites chosen by developers because it is a site that is relatively easy to develop or because it is the only land on which they have secured an option to develop. The only reference to local housing need is during the planning application process and this appears to readily dissipate once permission is achieved.

1.8 Despite the case made by developers in support of their proposals, and the very many promises made to local communities, the Parish has lost all confidence any benefits will be delivered to anyone other than the developer. Evidence supplied in support of development frequently ignores matters of local importance, responding only to a 'tick box' of issues deemed necessary to secure permission at appeal, and to provide a development it wishes to sell, not necessarily the development which is truly needed by the community.

1.9 The Parish strongly holds the view the planning system has lost sight of its true purpose of seeking to deliver the right housing or development, in the right place, at the right price and at the right time. It sees the development industry riding rough-shod over local communities, playing to the Government's push for growth. There is no issue with delivering growth and the Parish fully supports the objective, but it should not be development at any cost, or development management undertaken at the whim of speculators whose prime objective is to minimise cost and deliver profit for shareholders.

1.10 Bland, utilitarian estates as adjuncts to settlements are increasingly common place and frequently it is the community which picks up the true cost of development, having to be content with inadequate and increasingly stretched infrastructure, poorly designed and

uncoordinated developments, the loss of treasured elements, such as open areas and landscape features that offer individual settlement identity, and increased traffic generated by estates that can only be truly serviced by private car.

1.11 The Parish sees “Planning for the Future,” as a clear opportunity to reset the balance, bringing control back to the local planning authority and allowing local communities a true input to shaping their locations. Allowing planning to reach a wider proportion of the community through technological improvements and to provide greater confidence through up to date local plans are matters to be supported fully. For many years the Parish has campaigned for improved design quality and the Government’s emphasis on creating beautiful places through local plans, design codes and requiring greater design quality from developers is similarly supported.

1.12 However, the support the Parish wishes to give to the Government’s review is tempered by the very real concerns it has in respect of how these benefits are to be achieved and importantly enforced. The role of Parish Councils and the community in general, does not appear to be given a very meaningful role through the White Paper. There is very real concern that local democracy and opinion will be paid lip-service within a system appearing to be founded solely on the granting of planning permission for housing, not necessarily how, where or when it is to be delivered, or in what form. The process experienced and in the absence of detail advocated, is not as ‘joined up planning’ where not only are the houses delivered, but provided in the right place, at the right time, of the right type, at the right price and to a high standard of design and all necessary infrastructure.

1.13 The Parish has concerns that without local, meaningful input, appropriate controls and checks, particularly relating to planning enforcement, resources and the ability to challenge decisions that are potentially not sound, will result in a planning system that is no more positive and effective than exists currently.

1.14 The consultation is lacking substantial detail which is required to provide confidence the changes will bring about the desired changes and not result in more opportunities for housing developers to exploit weaknesses for their own aims. Much more detail is required to explain and demonstrate how the objectives of the White Paper will be delivered for example it is not understood fully what is meant by zoning and permission in principle, and does this move decision-making even further from the community into which the development is to be placed?

1.15 The role of local communities is unclear from the consultation. The community should be at the heart of the planning process, providing much needed experience and local knowledge to assist decision makers in reaching sound and sustainable decisions. Its role in future is unclear, if mentioned at all, and communities must ask if it will have the opportunity to participate and contribute to the consideration of detail as and when it might be available for local scrutiny.

1.16 Windlesham Parish was one of the first communities to produce a Neighbourhood Plan on the understanding it would enable the local input to decision making and shape the neighbourhood in a manner supported by the community. It is accepted a community is

likely to have a wide range of differing views on the amount and form of new development to be provided locally. It is the role of the Parish Council to balance those views for the benefit of the community at large, with the Neighbourhood Plan playing an essential role in portraying that balanced position and feeding into decision making at the 'strategic' local plan and the 'micro' individual planning application levels. The continuing roles of neighbourhood plans, their relationship to the new local plans and local input is very unclear in the consultation and there is very considerable concern this is a further attempt to 'side-step' local opinion, often seen by developers as an unnecessary and irrelevant nuisance and cause of delay.

1.17 Each location is unique. Circumstances to provide appropriate and sustainable housing (or other development) inevitably varies from site to site. The principle of each site treated on individual merit remains appropriate and vital if we are to secure the beautiful places the Government seeks through the White Paper. Yet this important distinction is missing with increased weight appearing to be offered to a 'technical one size fits all' tick box decision making process. How frequently have we seen a development that in principle ticks all planning boxes, yet results in an incongruous and unnecessary development that provides a continuing drain on local resources and give rise to many local problems because the individual circumstances raised often by local communities are simply pushed aside.

1.18 It is difficult for the Parish to support White Paper objectives fully in its current form if it is not known how the new system will work on a day to day basis, what input is expected locally, if any, and how this will be monitored and managed robustly, including steps to be taken when the system fails.

1.19 Successive Governments have complained about an ineffective planning process and applied limited fixes to adapt to a changed environment and changed circumstances. These changes have not always resulted in the desired outcome nor a cohesive planning environment, providing confidence for all, who consciously or otherwise, rely upon its output. If the review is to be effective it must be comprehensive, applied to all elements of legislation which affect planning decisions, and govern developments once implemented and the residents of the new housing. IT should not simply be a review of planning legislation in isolation, but part of a true, national infrastructure plan. Permitted development rights for example, while well intended and an attraction for removing undue bureaucracy, are a constant source of complaint, poor design and implementation, where Parishes and planning authorities have to pick up the pieces.

1.20 The White Paper provides potentially an initial coordinated vision, to be handed down for application in detail at a local level, carrying at all times the controls and incentives to deliver growth. However, the absence of detail on how the system is to be managed and what role is to be played by local communities means it cannot be supported wholeheartedly at this time. The White Paper appears to reduce the ability of communities to influence the form and location of much needed development and the rejection of commonly poor and unnecessary speculative developments. The Parish is unsure how the changes will satisfy the democratic process, as the role of Parish Councils is given scant mention, just one passing comment, in the White Paper. When this is compared to the

mention of housing and housing delivery, well in excess of 100 times in the White Paper, the weight given to local opinion and assistance appears de minimis.

1.21 While much is said about the use of technology to reach members of the community so they are potentially informed, there is very little on how local views and knowledge will be applied, if at all, to development decisions. There is a real concern a move to process driven decision-making questions the role of consultees, avoids local input and reduces time for decision making. Input to local plans and decision making in compliance is supported as a principle, but limited time for production, the absence of any enforcement (and democratic) checks and the lack of local government resources suggests an overly optimistic reliance on a new process, which has yet to be tested in detail. The claimed improved engagement with the public appears one directional and more engagement on this matter as detail is available is essential.

1.22 Rules and guidance are meaningless without sound enforcement; an area where many of the public have lost faith in a system that does not appear to be applied equally or fairly, or where constraints imposed to ensure a development is acceptable, are simply ignored, with little or no enforcement. There are frequent cases of developments being undertaken without adherence to submitted and approved plans, without action being taken or not being followed through by the local planning authority. It is a system that favours the developer, and especially those willing to ignore any control that is troublesome, even if imposed for sound reason. A clear commitment to enhanced enforcement alongside a speeded-up decision process and effective plan making is to be welcomed, but the White Paper fails to provide confidence the enforcement procedures will be strengthened. Instead the consultation proposals again favour non-compliant developers, and now even more strongly with no enforcement commitment. Even a local plan based on fact not perception or subjectivity, prepared in a joined-up manner to ensure all necessary infrastructure is provided with the development, and with true powers to deliver through a sound decision, risks failure without an appropriately funded means of compliance and enforcement.

1.23 It is not the system per se that has failed but a lack of flexibility to respond to changed circumstances and the manner in which sections of society have used or misused the system to further individual objectives. There is very real concern a move to an over reliance on technology for decision making and too much permission in principle to simply satisfy developers in the granting of permission, for which there is no incentive or requirement to implement, will result in a very quick erosion of local character and distinctiveness and an increase in the reduction of resources and vital infrastructure.

1.24 The White Paper plays to the now out-dated approach of the volume housebuilders, offering to perpetuate the poor practice, and apparent inconsistency and remoteness, which is the root cause of public dissatisfaction with the planning system and decision making. It is noticeable the principal source of why we fail to deliver sufficient houses of the right sort, in the right place at the right time, is the way in which development is delivered in England; not the project management of a development, but the means of land promotion, speculation and land banking. If this were to change, it would, more than any other intervention, very quickly deliver much needed growth. The White paper would then only



have to concentrate on improving design, responding to changed ways of living and climate change. Unfortunately, the White Paper's focus is to perpetuate the problem of house building not resolve it.

1.25 Public perception, sees housebuilders easily avoiding their responsibilities to deliver good design, respond to changing living patterns and respond positively to climate change. How often is viability used as an excuse not to deliver on promises of affordable housing, landscape, good materials and design? The White Paper's pronouncements on encouraging these is to be supported, but there is no response to the developer excuse of excessive costs eating into profit. Reducing land cost through the removal of opportunities for speculation and land banking, will remove such complaint at a single stroke.

1.26 A simplified local plan with development presumptions and national development management policies is a robust step forward, as is the concept of a simple growth, renewal and protection criteria. This should be easily understood by the general population and provide confidence development will be permitted in accord with the plan, and ideally, suitably enforced to do so. However, suggesting planning effectiveness will arise through simplicity is to reflect a somewhat naïve understanding of what planning is about, and the very many strands that are involved in any decision reached or site allocated. Have simplicity in a framework certainly, but much more careful consideration is required of the three broad land use forms proposed, how and what rules are to be applied to each, and how vital economic drivers, which do not comply, are captured.

1.27 It is understood the public, and elected members will have a say in the development of new local plans, but the time offered to 'get the first plan right' is too restrictive. The Parish supports a much faster approach to plan making and delivery and sees no reason why regular monitoring and review should take very long. Yet this can only be effective if the baseline is sound from the outset and therefore it is believed more time should be assigned to the first plan productions than subsequent reviews.

1.28 Planning restricts development and growth, is a regular plea from developers or those wishing to raise land values. True, locally planning can be a problem and most users will quickly point to some aspect which has been unnecessarily troublesome or time consuming. It is however, only part of the issue confronting housing delivery and can only be part of the solution. There is no obligation to deliver any permission secured, even in a situation where there is a chronic housing need, and this does not change under the new proposals for housing supply calculation or delivery. There is a requirement for punitive measures to be employed where developments promoted specifically to meet housing need are not delivered or where local plan allocations, with permission in principle granted following a presumption of availability, do not come forward within defined timescales.

1.29 The concept of three planning area tiers; growth, renewal and protection are simple and easily understood. Theoretically therefore this could provide confidence to the public in having knowledge development will occur or be resisted in accord with approved plans. Unfortunately, this is far too simplistic as sound planning decisions understood by the Parish is far more than simple compliance. If positive and sustainable growth is to be maintained Nationally, it is vital the balance between economic, social and environmental interests is

maintained at all levels. All contributory elements to growth, infrastructure delivery and environmental protection, must 'joined up' in their weighting and consideration, their formulation, delivery and maintenance. Growth is not simply housing delivery and it must consider local issues and opinion as to how it should be accommodated.

## 2 Growth

2.1 Many principles of the consultation are sound, but contradictory elements and lack of detail results in a lack of confidence. If the consultation is for agreement on principles it can be broadly supported, but it is the support detail which must be subject to testing scrutiny. The Parish wishes to know how it can contribute to a debate of the detail backing the review and when this is to take place.

2.2 A most obvious shortcoming is the lack of demonstration the newly calculated housing need can be accommodated within the tiered system of growth, renewal and protection. The strategy is clear, and sound in principle to have a single means of calculation which applies across the country and is binding. However, the new methodology applies to England as a flat plain and is non-binding. There is need to take account of physical settings and to introduce some prescription; how can you apply a standard methodology equally to all authorities?

2.3 The methodology must include a physical (constraint and capacity) component, but how that is quantified for algorithmic application is open for debate. Local decision making can provide that element in decisions over development locations and respond to current and expected future patterns of living.

2.4 A National Vision set out in National Development Management Policies is a sound objective, leaving local plans to address complementary local policy issues. This must include clear development objectives set at national level to be interpreted through local plans and address the fact that we live across borders and in the absence of the ill-fated duty to co-operate, local input to that latter stage is critical.

## 3 Protection

3.1 There are many areas worthy of protection, many have yet to be designated and there are others, which may no longer warrant protection or where the definition of protected areas has been too liberally drawn. To work effectively areas of protection must evolve to balance areas of growth and renewal. A protection zone should not simply seek to protect additional land or to cover any land not identified for growth or renewal. It should be a mechanism to protect the most sensitive land, safeguard land for future use and enable appropriate development to be accommodated within protected areas to meet specific needs; it must also manage growth displaced by areas of protection. Detail is lacking on how this important balance will be delivered, or indeed how weight will be applied to matters to be protected. There will be a significant difference between matters protected for a national interest and that at a local level. While National Interest must immediately attract more weight, this should not diminish the weight applied to local areas of protection with which communities interact daily.

3.2 To succeed a revised planning system must include a requirement to properly assess capacity and set clear guidelines on process. This must include thorough testing of current constraints and restraint boundaries to ensure that local and strategic growth is balanced with the creation of new and enhance existing places, protect sensitive environments, and community need at all levels.

#### 4 Plan-led

4.1 A front-loaded, plan led system provides certainty for the developer and the community and is to be supported. Yet if it is to succeed it must rely on a sound and effective plan making process. It is more than allocating sites; it must be about meeting diverse needs through the shaping of sites and the spaces between; the acknowledge of what provides identity to areas and how can this be enhanced; neighbourhood plans and community input can play a very important role in creating and evolving local places that work.

4.2 How this important role is to be accommodated within the new system is unclear as is the role local communities are to play. Plans must be led by vision not technical compliance; a vision which identifies the economic, social and environmental deficiencies and opportunities of an area and balances this through provision and policy. Plans must offer clear parameters for guidance but allow for flexibility; it must contain plans for delivery not simply allocation.

#### 5 Delivery

5.1 Sustainable, enforceable local plans and design codes responding to changed circumstances and climate, must think differently about housing and growth delivery. Moving away from the out-dated, unsustainable approach of new volume house-building on the periphery of existing settlements; problems perpetuated by the way in which we deliver new housing.

5.2 The Covid pandemic demonstrates most clearly, we do not have to continue as we have in the past perpetuated by limited interests. The opportunity to make the step-change must be grasped to recharge the economy, by truly balancing social, economic and environmental issues through a plan led system, that provides confidence to the community over which it will apply. The detail to deliver through the new system is lacking currently from the White Paper and it fails to clearly remove the true obstacle to growth through housing delivery, which is the approach of the housing industry itself and the absence of any meaningful or balanced contribution of local communities.

5.3 There are many potential sites within urban areas, which will meet changed lifestyles, but the “next available green field” is an easier and cheaper option for developers to promote. The release of peripheral green field sites should become the exception, not the rule; renewal should be given higher priority and renewal sites more easily secured and permitted. Greenfield sites beyond settlement boundaries and open spaces within urban

areas should not be contemplated for release if it is demonstrated that ample brownfield or renewal land is available in sustainable locations. Any speculative proposal must be required to demonstrate very special circumstances that go beyond a simple mathematical calculation of a point in time housing supply figure, and through housing delivery trajectories, demonstrate the local plan strategy is not, and will not over its lifetime, meet local or strategic need.

5.4 Growth is not secured by the number of houses built annually, but by the right houses (or development), in the right places, at the right cost and delivered at the right time. The current planning system has failed to deliver that need, as it has not had the tools, or authorities have not used the tools they have effectively to deal with the root cause, of housing delivery, which is the way the housing market and supply operates. A planning review which fails to address this issue and ignore local voices will similarly not deliver.

5.5 The suggested capture of more land value uplift to deliver increased infrastructure provision and the replacement of s106 and CIL payments with a single “day one payment” is encouraging. Yet there is no advice to Parish Council’s as to how this will assist them in the delivery of their roles and no clear demonstration how a new approach will tip the balance of the current inequitable system there is little confidence it will result in the required objective.

5.6 Planning and the role of a local community within decision making has become the ‘Cinderella service’ of local Government, often part of a bigger service group with little or no true idea of what planning is or how powerful it can be in delivering growth. Planning is seen simply as a regulatory process to run at minimal cost, not the visionary process of delivering growth which it should be.

5.7 Good planning is the key to the delivery of all local government services and systems. It is the only service with the skill to coordinate the often, competing claims affecting sustained growth, and has the vision, skills and knowledge to see opportunity in existing areas; and to balance the needs of the community, local business and the environment. Yet there are few if any, good planners in senior local authority roles. In fact, there are very few chief planners to oversee and apply any vision to planning at a local level within a planning section, let alone have any strategic impact on local growth. Recognition that authorities should have a “Head of Place Making” is supported wholeheartedly, but it is difficult to see how this can be delivered effectively through the present local Government structure and with less and less connection with the community.

5.8 An important ‘checking mechanism’ for local plans and design codes is to have as wide a community involvement as possible and technology can assist greatly in reaching those who traditionally are not involved. More detail is required as to how this will work, particularly in providing accessible, accurate and balanced evidence and explanation, to inform. Parish Councils are a vital tool in explaining and distributing information locally but this is not mentioned by the White Paper.

5.9 The consultation document is 'high level' and therefore supported in its aspirations for delivering more housing of better design, and to ensure the public is better informed through technology about developments affecting their areas. What is so very clearly lacking is any explanation of how this vision will be delivered sustainably; how local plans and policies will be enforced; how the planning system will be part of a joined up legislative framework; how it will be focussed area to area; and how new development can be welcomed and encouraged by local communities who continually see their role and voice diminished in favour of house builders; developers who use local need as their justification and reasoning when promoting development, but who regularly fail to deliver other than what they wish to provide, when and where they choose.