



**Planning White Paper –  
Formal Response from Worplesdon Parish Council**  
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**Questions:**

**1. What three words do you associate most with the planning system in England?**

The three words are complex, discretionary and inefficient.

**2. Do you get involved with planning decisions in your local area?**

**A:** Yes. Worplesdon Parish Council has the right to receive and comment on planning applications. Any attempt to reduce the level of community involvement in the planning process would be a retrograde step, which the Parish Council would vehemently oppose.

**3. Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future?**

**A:** By email.

**4. What are your top three priorities for planning in your local area?**

**A:** Our top three priorities are – (1) To protect the Green Belt (2) the provision of more affordable housing, (3) improved infrastructure.

**5. Do you agree that Local Plans should be simplified in line with our proposals?**

**A:** Yes. Three categories is better than two as it allows a local plan in an area to differentiate between growth and renewal.

**6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally?**

**A:** No. The local authority must have the freedom to include their own development management policies for their area, as guided by NPPF.

**7(a). Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of “sustainable development”, which would include consideration of environmental impact?**

**A:** Not sure as there is not sufficient information contained in the consultation to come up with a conclusion.

**7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?**

**A:** The Duty to Co-operate must be retained to ensure cross boundary issues are taken on board.

**8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced?**

**A:** Yes, as this would reduce the time spent on this in Examinations in public and at Planning Appeals.

**8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated?**

**A:** No. The existing urban areas extent should be included, however, there is a concern about using affordability criterion as this would imply greater numbers of houses in places where there may be constraints, such as The Green Belt, or due to a lack of infrastructure.

**9(a). Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent?**

**A:** No. With outline applications, there is still a need to ascertain whether or not there is sufficient space to build the houses, roads, green space etc. within the red line boundary to ensure that cramped development is not the result.

**9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?**

**A:** Not sure as more information is required to be able to comment fully.

**9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime?**

**A:** Yes, if these developments are very large 4,000+ homes but not for less.

**10. Do you agree with our proposals to make decision-making faster and more certain?**

**A:** Not sure. Whilst some of the proposals are acceptable, some of the larger applications can take some time and there is no mention of any planning agreements between LPAs and developers to agree the time. Delays to the system tend to be caused by developers not submitting information correctly and in time.

**11. Do you agree with our proposals for accessible, web-based Local Plans?**

**A:** Not sure. Whilst what is proposed sounds good, experience tells us that, in practice, this is not the case with external IT companies. It would be better to set guidance on what the Local Plan should contain and let local authorities be free to produce the plan.

**12. Do you agree with our proposals for a 30-month statutory timescale for the production of Local Plans?**

**A:** No. Whilst there is a need to speed up the process, this has gone too far and probably more time is needed to assess the sites submitted during the call for sites programme. A tighter timescale would be welcome, however, some of the other items being in place such as standardisation of the housing numbers calculations. The examination in public stage would be required for all local plans.

**13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system?**

**A:** Yes. These should be retained, as these have been of benefit to the areas that have adopted them.

**13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?**

**A:** Better guidance on how to improve the Neighbourhood Plans (NP) process would be one way of improving the process in addition to digitisation. However, this can become expensive for the town councils and parishes who choose to undertake a NP, so perhaps money can be made available for these bodies.

**14. Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support?**

**A:** Yes. Build outs of developments do take time due to economic reasons rather than planning reasons. Developers depend on cash flow to build houses, which is nothing to do with the planning process. If developers had access to guaranteed loans (by government) then building would continue. However, if the economy is not performing well or mortgage rates are high, houses do not sell.

**15. What do you think about the design of new development that has happened recently in your area?**

**A:** Not well designed.

**16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area?**

**A:** Less reliance on cars, better buses and cycle routes, more green spaces, energy efficiency buildings, building the right houses.

**17. Do you agree with our proposals for improving the production and use of design guides and codes?**

**A:** Yes – better design is essential for new developments; however, therefore encourage would need to be given to local authorities to ensure that local design guides are produced.

**18. Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making?**

**A:** Yes. There should be a new body and each authority would need a chief officer for design and place making subject to the planning department having the resources for such a post.

**19. Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England?**

**A:** Yes. Design is an important element for a successful development.

**20. Do you agree with our proposals for implementing a fast-track for beauty?**

**A:** No. Complying with local design guides is only one element to a development, other elements have equal importance such as density, transport, safety etc. and no one element should allow an application to be fast tracked.

**21. When new development happens in your area, what is your priority for what comes with it?**

**A:** Affordable housing, necessary infrastructure, green spaces, services.

**22(a). Should the Government replace the Community Infrastructure Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold?**

**A:** No. The Infrastructure Levy is for all infrastructure within the authority. The s106 is directly related to the development and can also contain things such as how private roads are managed and maintained, or are contributions for non-infrastructure items such as bus services and other non-contribution elements.

**22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally?**

**A:** Any levy should be set locally as it is for local infrastructure and not set down by central government.

**22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities?**

**A:** The levy should aim to capture the same amount to ensure fair contribution to infrastructure.

**22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area?**

**A:** Yes. Only if it can deliver the infrastructure required earlier than planned.

**23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights?**

**A:** Yes. Only when there is a new build and not for change of use.

**24(a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present?**

**A:** Not sure. Affordable housing should be provided on site to ensure delivery, off site contributions are dependent on land availability and planning permission. If some affordable housing is provided onsite the rest should be through a levy as contributions in s196 agreements can be re-negotiated.

**24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities?**

**A:** No. It should be part of the levy.

**24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk?**

**A:** Yes. Any overpayment would need to be mitigated hence answer in 24b

**24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality?**

**A:** Yes. The affordable housing would need to be built under the same design guide as the market housing.

**25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy?**

**A:** No. The levy has been through examination in public and should be spent as approved with no flexibility.

**25(a). If yes, should an affordable housing 'ring-fence' be developed?**

**A:** No answer as the answer to 25 was No.

**26. Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?**

**A:** No views.