



CRANLEIGH PARISH COUNCIL

29 October 2020.

Planning for the Future Consultation
Planning Directorate
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London
SW1P 4DF

Submitted via email to: planningforthefuture@communities.gov.uk

Dear Sirs

Planning for the Future White Paper Consultation

The Council would like to submit the following responses to the consultation whilst acknowledging that huge upheaval to the planning system is being proposed at a time when the huge challenges and impacts from Covid-19 and Brexit on our economy and on our communities, as well as realistically on the ability of developers to deliver housing is completely unknown.

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

Developer led system

Question 2. Do you get involved with planning decisions in your local area? [Yes / No]

Yes as a Parish Council we comment on planning applications.

Question 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? [Social media / Online news / Newspaper / By post / Other – please specify]

We are informed by the local planning authority, our borough council, by a weekly email of applications in our area. These are also available on the borough council website, as planning applications are all digitalised and available online for comments to be made online, by email or by post. We also have access to an interactive planning map where you can search for planning applications, site planning history, general planning constraints, conservation areas, listed buildings and tree preservation orders. There is also an online S106 and CIL database to access individual agreements and track payment due, collection and expenditure dates.

The ability to digitise and use multi-media as is suggested in the white paper, also invites the use of alerting systems, similar to highway authority works, to inform stakeholders at an early stage.

Question 4. What are your top three priorities for planning in your local area? [Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other – please specify]

1. The protection of the environment, biodiversity net gain and action on climate change
2. The sustainable design of new homes and places to achieve net zero by 2050
3. Increasing the affordability of housing, with measures including land capture value, long term tenancy agreements and rent controls, together with a tax system that favours long term property ownership whilst actively discouraging speculation in the property market.

Question 5. Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.]

No. There is no evidence that Local Plans are holding up development, more than sufficient planning applications have been granted in Cranleigh and the surrounding villages. We have no control over the build-out rate, this proposal does nothing to address that.

The White Paper splits land into three categories: growth, renewal and protected whilst protecting the green belt and areas of outstanding natural beauty. These zones if applied to the borough of Waverley with 81% of the area covered by: green belt policy, designated as an Area of Outstanding Beauty (AONB) or an Area of Great Landscape Value (AGLV), would force even more development on to areas of beautiful countryside beyond the green belt, including Cranleigh and the surrounding villages, which already have disproportionate allocated housing allocations. Polarising housing in ever decreasing areas of open countryside in the borough whilst protecting land on the green belt perhaps of a lesser environmental value continues not to be addressed. The protection of selected areas against urban sprawl is inevitably leading to sprawl in other areas often against a backdrop of little infrastructure and at the expense of the environment.

The simplistic three zoning categories do not reflect the complexity of the differing urban landscapes of our cities, towns and villages balanced with the rural landscape and finely balanced biodiversity of our countryside. The inflexible zoning process sets a rigid approach to local plans that does not react to changing circumstances. The details provided regarding the five year review are limited and seem to focus on providing additional zone areas rather than allowing a rezoning exercise.

Local plans and neighbourhood plans already allocate strategic sites and employment sites within a local consultation context with both communities and developers. The introduction of zones with limited public consultation front loaded strips out localism from planning. Having experienced considerable development in our village, we are aware of the considerable difference there can be between proposals at the outline stage of an application and those submitted at reserved matters. Individual planning applications within any strategic/zoned area must be subject to public consultation at all stages.

The specification of zones also needs a stronger statement regarding specification based on the balancing of current use vs development need. The impact of growth on agriculture in areas currently underused will need to be balanced against housing, particularly in a post Brexit world. Likewise, for industrial development, health and education, the principles used here do not say enough about defining that balance for zoning.

Zoning could also drive up land prices in these designated areas impacting on viability and potentially creating a further barrier to affordability. Whilst a share of an uplift in land values would be welcome there are not sufficient details to know what this would actually entail including what level/percentage this would be set at.

The reduction to a 10 year plan period does not allow for the timescale required for the development of new communities, like garden villages, and does not facilitate a long term strategic approach.

Question 6. Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally? [Yes / No / Not sure. Please provide supporting statement.]

No. The White Paper strips local planning authorities of the ability to set local policies. This more centralist approach removes the flexibility to respond to a local context and reduces the opportunities for consultation with local communities. Local policies set by the planning authority would have extremely limited scope including broad height limits, scale and/or density limits for land included in growth areas and renewal areas. This one size fits approach is a retrogressive step and would encourage homogenised, low quality housing on a national scale.

Question 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? [Yes / No / Not sure. Please provide supporting statement.]

No. There is far too little detail on the single test to be able to make a judgement on this important process and to agree to any removal of the Sustainability Appraisal. Taking a centralist approach, as in other areas of this white paper, it might imply a heavy reliance on a sustainability desktop exercise which fast tracks applications without the need for individual wildlife studies and does not take into account migratory and dispersed wildlife or the cumulative effects of development. Comments surrounding the soundness test and deliverability appear to promote a land banking approach by developers and again lack detail.

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

The removal of the duty to co-operate is welcomed as our experience on countryside beyond the green belt, with neighbouring authorities constrained by green belt has meant that housing has again been directed to open countryside beyond the green belt regardless of employment opportunities, infrastructure or environmental damage. Cross boundary issues can be consulted on as part of an individual application process.

Question 8(a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced? [Yes / No / Not sure. Please provide supporting statement.]

No. There is a disconnect between the two papers which needs to be addressed. The Planning for the future white paper introduces a standard method for setting a top down national “binding” housing requirement figure for each local planning authority which has already taken into account constraints in a planning area. Whilst the now closed consultation on changes to the current planning system proposed a new standard methodology for calculating local housing need which can then be balanced by the planning authority against local constraints.

There would be a requirement to meet the proposed standard methodology housing numbers during the transition from the current Local Plan to the new Local Plan prepared under the methodology exposing Cranleigh to yet more speculative and unsustainable development.

We would draw your attention to the points we made with regard to the proposals in the changes to the current planning system consultation:

“Introducing a new standard methodology for calculating housing need would increase Waverley’s annual allocation for 590 dwellings to 835 dwellings. The new standard methodology is another desktop algorithm for setting targets that are unrealistic and fail to consider the local housing market perspective. This proposal appears to earmark London and the South East as the most concentrated area for growth however it is also one of the most constrained areas with the Metropolitan Green Belt. This puts further enormous pressure on the limited areas of countryside beyond the green belt, like Cranleigh.

There is no consideration for the consequences of delivering large numbers of houses in these ever decreasing concentrated areas. It is clear that these areas continue to be selected not because they are sustainable locations but purely because they do not have the policy constraints of the green belt.

Developers have no incentive to build excessive housing in these areas as their objective is to maintain high housing prices, they therefore trickle feed the housing which does not keep in line with the housing delivery numbers required by the Government and forces planning authorities to grant more planning permissions as a 5-year housing supply becomes impossible to maintain. This proposal does nothing to address this and puts even more pressure on small market towns and villages which do not have the supporting infrastructure and effectively creates unsustainable dormitory towns with a heavy reliance on the private car.

It is also difficult to understand why Waverley's targets are increased by 40% under this proposal but Woking's numbers will be reduced, despite Woking's supporting comprehensive infrastructure, and particularly when Waverley's allocated housing numbers were increased to meet 50% of Woking's unmet need.

With Government committing under the delayed Environment Bill that new English developments will be required to demonstrate a 10% increase in biodiversity on or near development sites this new proposal seems to be completely contrary to that commitment. The natural environment and the climate emergency should be a focal point of this proposal in order to have any chance of meeting the Government's target for net zero by 2050.

Climate change is already having a very real and increasing impact on our parish. We are in an area of water stress and this is becoming more apparent each year when residents have repeated interruptions in water supply, necessitating the reliance on deliveries of bottled water.

The new standard methodology does not take adequate account for the impact on the economy and on our residents from Covid-19 and it would appear that any methodology based on historical data should now be considered fundamentally flawed. In fact, it would seem completely the wrong time to make such radical changes to the planning system when people's minds are focused on the health and well-being of their family and friends and protecting their livelihoods. The future of the economy is at the moment subject to so many variables, including a downward trend of house prices, or even a collapse, which could result in policy which is not fit for purpose and we all remember the ghost estates in Ireland in 2010. We do not support this proposed change."

The proposed standard methodology for housing number calculation takes into account the difference between housing affordability now and 10 years ago. In an area where house prices are high and the average family needs a household income of £102,167 (source WBC Housing Need and Local Affordability Analysis April 2018) to obtain a mortgage, this proposed formula pushes the housing numbers for Waverley to an unachievable level. The local housing market cannot absorb this level of growth.

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? [Yes / No / Not sure. Please provide supporting statement.]

No. There is no proof that not enough land is being released, there is proof that planning permissions granted are not being built out at a sufficient rate to meet demand. Whilst the green belt policy protects designated areas from urban sprawl, this sprawl is directed to areas of open countryside, regardless of the size of the existing settlement, on countryside beyond the green belt.

The affordability clause proposes an even higher percentage of housing in the south east of England in an attempt to force house prices down, however it does not link the cost of housing with access to employment, the road network, airports etc. The white paper also does not address the lack of incentive for developers to flood an area with housing where prices are high in an attempt to reduce those house prices.

It also takes no account of environmental constraints and the impact on natural resources. The south east of England is in an area of severe water stress and we have experienced increasing interruptions in the water supply to Cranleigh, as well as to those of surrounding villages, over the past couple of years. We also have failing water quality in our rivers which receive increasing amounts of treated effluent from sewage treatment works. Whilst affordability is an issue, this is not simply addressed with more housing in the south east of England and should be addressed through multiple interventions including land capture value, long term tenancy agreements and rent controls, together with a tax system that favours long term property ownership whilst actively discouraging speculation in the property market. It should not be at the expense of the environment.

The proposed retention of the housing delivery test simply perpetuates the misdirected penalties on planning authorities and ultimately on communities of the non-delivery of housing by developers. The Paper fails to address this major central blockage of housing.

The Local Government Association's analysis found 2,564,600 units had been given planning permission since 2009 and 1,530,680 had been constructed. This clearly highlights that there is a problem in delivery and that it is not councils that are the blockage to the government's target of creating 300,000 new homes a year. There is no incentive or penalty in this paper for developers that continue to build just enough homes of just enough quality to deliver the maximum return on capital employed. This system has delivered good returns for developers over a number of years whilst supporting both the undersupply of housing and the inflation of house prices, further impacting on a higher housing benefit bill.

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? [Yes / No / Not sure. Please provide supporting statement.]

No. This proposal removes the right of public consultation on individual planning applications within growth areas and removes the ability to consider site specific matters through the planning application process. It creates a huge challenge for local plans to consider the impacts of development across what could be very significant areas without the benefit of any knowledge of specific proposals that might come forward in those areas.

9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas? [Yes / No / Not sure. Please provide supporting statement.]

See previous answer to 9a the same blanket approach applies to Renewal and Protected areas.

9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime? [Yes / No / Not sure. Please provide supporting statement.]

No as there is insufficient detail as to how this would be accomplished. There is also insufficient detail regarding the weight of master planning and design guides in the new settlement process.

10. Do you agree with our proposals to make decision-making faster and more certain? [Yes / No / Not sure. Please provide supporting statement.]

Waverley already relies on a digital based approach (see answer to Question 3). Future developments in this area to make planning accessible to residents and local authorities would be welcome. However the digitisation of the system could exclude a swathe of our population who are not digitally aware, or do not have access to high speed broadband in rural areas.

The ability to easily comment on individual planning applications should be retained. This proposal whilst providing access to information does not appear to strengthen community involvement and may actually weaken the ability of the local community to have their say by removing their right to be heard, including at a public examination into the Local Plan.

Local Planning authorities already monitor their progress against decision targets. According to MHCLG publication Planning Applications in England January to June 2020 (issued date 29 September 2020) between April and June 2020, district level planning authorities in England decided 89% of major applications within 13 weeks or the agreed time, up one percentage point from the same quarter in 2019. This again does not indicate that planning authorities on what are often extremely complex and large sites are causing delays and this is also whilst local authorities have faced the challenges and additional pressures due to the coronavirus outbreak (COVID-19).

There is no evidence that delays in the decision making process can solely be attributed to the local authority and are often down to other factors which includes applicants not responding quickly or the absence adequate information.

The White Paper gives no insight into the transition to this new system, how will planning professionals, local planning authorities, Town and Parish Councils and the local community be trained to work within the new parameters. Local planning authorities will be subject to performance framework review and early interventions should problems arise.

There is a danger that the pursuit of a simplified process/slimmed down approach means that sufficient information is not provided for robust decision making in an area which impacts our residents the most.

Question 11. Do you agree with our proposals for accessible, web-based Local Plans? [Yes / No / Not sure. Please provide supporting statement.]

Yes. However this is already being done. Waverley Borough Council provides access to Local Plan documents online. Any developments to improve this process and to encourage consultation with residents would be welcome.

12. Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans? [Yes / No / Not sure. Please provide supporting statement.]

No. The Parish Council questions whether the new statutory tight timescale of 30 months for the preparation of the Local Plan, with only approx. 24 months to submit the Plan for Examination is realistic and achievable particularly for planning authorities in rural areas and whether this will lead to yet more uncontrolled development on green fields that do not meet this timescale. There appears little appreciation for the time it takes for wildlife studies to be undertaken over several months and during optimal times of the year and a very real risk that this would result in less robust reports. Yet again sanctions are being proposed on the local planning authority if they do not meet the new deadlines set, which ultimately sanctions communities like ours, but no sanctions for developers that delay building.

We also have significant concerns about the opportunities for local communities and other stakeholders to get involved in the plan making process. The suggested "best in class" consultation at stage one on the concepts of where development should go and what it should be like (allocating zones and design codes) rather than more concrete plans and local policies would be challenging to engage residents on, particularly as on inspection, this will bear little resemblance to the finished development on site and would be at the expense of site specific consultations when in possession of the full details of an individual planning application. There is no public consultation at stage 2. The stage 3 phase where the submitted and complete draft plan is put out to a 6 week consultation period and at which historically levels of engagement usually increase is proposed to be subject to a word limit to restrict comments, which appears to contradict the intention to try to widen engagement. This suggested process reduces opportunities for the public to engage during the formation of the draft plan.

Question 13(a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system? [Yes / No / Not sure. Please provide supporting statement.]

Yes. Neighbourhood Plans should be retained, however it is unclear how it would fit in the proposed process. The suggestion of design codes at a granular level appears to reduce the influence of Neighbourhood Plans to influencing extensions and infill development which pays little regard to localism.

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?

The use of digital tools (of which there are many) in neighbourhood planning is welcome but can also exclude a large section of society that is not so digitally aware or does not have access to high speed broadband as in many rural areas. There needs to be a hybrid approach in order to ensure access for all. It is difficult within this proposal to see how local design codes can be accommodated in this process when so much is centrally led and appears to have so much apparent weight. It is also not apparent how this process would fit with design codes in local plans.

The paper is silent on how these new digital tools will be funded and if any training will be provided for local planning authorities and local communities on their use to get the best out of this new digital innovation in neighbourhood plan making.

Question 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? [Yes / No / Not sure. Please provide supporting statement.]

Planning permission should be linked to an agreed phased delivery with penalties for non-delivery, such as a percentage of council tax charged on phases of development that have not been delivered in line with the legal agreement.

Development on major sites that will be phased should be agreed in advance between the developer and LPA and written into the S106 agreement. This means that the LPA will be able to have a more realistic idea of what will be delivered. Currently affordable housing is written in to the agreement but if all housing is viewed as a social benefit then we could include phased development targets, particularly on strategic sites in Local Plans

Starting a development where phasing is not appropriate should involve 'completing' a percentage of dwellings on the site, or where serviced plots are being provided a percentage of services and supporting infrastructure as agreed within the S106 agreement.

Compulsory purchase of sites that are not delivered over a plan period or 10 years from the date of grant of permission.

Higher rates of tax on land-banking by non-building companies who push up the value of land.

Apply higher taxes on developers' 'current land banks' which contain more than five years' worth of housebuilding based on their current build rate.

Question 15. What do you think about the design of new development that has happened recently in your area? [Not sure or indifferent / Beautiful and/or well-designed / Ugly and/or poorly-designed / There hasn't been any / Other – please specify]

Standard housing purported to be in the Surrey vernacular but fairly representative of housing across the South East. Absence of environmental/sustainable features. Tendency to avoid innovative design. No sense of place. Site edges are normally marked by garden fencing despite the countryside location.

Question 16. Sustainability is at the heart of our proposals. What is your priority for sustainability in your area? [Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other – please specify]

Energy efficiency of new buildings – net zero carbon, orientation, renewable energy, triple glazing, water conservation, rain water collection, built with Passivhaus principles.

Use of brownfields first to reduce impact on countryside.

Addressing flood resilience.

More native species planting schemes including street trees and provision of wildlife corridors

More protected green and open spaces

Parking that does not dominate the street scene

Outdoor space

Office space

A concentration on the built form site edges that compliments the location and does not form a barrier around the new estate.

Question 17. Do you agree with our proposals for improving the production and use of design guides and codes? [Yes / No / Not sure. Please provide supporting statement.]

Not sure. The use of national design guides and codes whilst laying out basic principles of good design (which are already available) could suppress innovation and encourage a build by pattern process. Good design has to respond to the location, topography, character, history and provide a sense of place. It should be required on a site by site basis and include designs that take account of site specific environmental constraints and protections with net zero carbon buildings.

Whilst national design codes like the manual for streets were broadly accepted as positive, there were concerns that these would be set at a low level to ensure developer viability.

Some protection is needed for these design codes against late revisions during development by developers based on economic viability grounds. Design Beautiful standards must be met, not just initially planned for.

Climate Change and environmental assessment requirements which limit the adverse impacts on the environment must be central to the design process.

Question 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? [Yes / No / Not sure. Please provide supporting statement.]

Not sure as there is insufficient detail. Any new body would need to be independent and led by design experts. It should not remove the ability of a local council to make decisions on what type of development is appropriate for their area.

The requirement for a Chief Officer for design and place making in local planning authorities may be a positive step, but it is unclear how this role would work within or alongside local authorities. It is also unclear how their opinion would hold weight in the push to build more houses. This role would also need support from an environmental and ecology expert to ensure that environmental assessments are fully considered within the design process.

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

Whilst it is important Homes England ensure design principles are embedded within their processes we do not think it is appropriate that they should form the body that establishes national design codes. It is also important that the role of delivering 'beautiful places' is under a local decision making process rather than a national body.

Whilst technical space standards and basic design criteria may be appropriate to set under national codes, local design and environmental assessments should be undertaken locally.

Question 20. Do you agree with our proposals for implementing a fast-track for beauty? [Yes / No / Not sure. Please provide supporting statement.]

No. The justification or necessity for 'fast-track for beauty' is not made and there is no proof that this would not simply deliver centrally led subjective fast track design without any environmental assessment. It is important that the environment is not an add on to the design process.

Question 21 When new development happens in your area, what is your priority for what comes with it? [More affordable housing / More or better infrastructure (such as transport, schools, health provision) / Design of new buildings / More shops and/or employment space / Green space / Don't know / Other – please specify]

Each application must be treated on its merits and priorities identified to support the local area and based on local knowledge.

Taken from our Neighbourhood Plan:

“The community expressed the strong view that they wanted Cranleigh to retain its ‘village feel’, whilst providing for a mix of housing with a variety of tenures, from social and affordable to market homes, reflecting the density of the village and to meet the changing needs of the community over the plan period.

The community stated a strong preference for new development to be located on previously developed land (brownfield land). They wanted energy efficient, well-designed homes with adaptability built in to accommodate residents’ needs, whilst complementing existing styles and preserving the village character and heritage of Cranleigh.

Adequate off-road car parking was highlighted as important for residents and visitors, with new housing located near to the village centre to encourage walking and cycling.

The need to protect, enhance and provide sufficient green spaces alongside new development, as well as protect the local ecology was emphasised.

It was agreed that local employment and businesses should be encouraged and supported, including rural enterprises.”

Question 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? [Yes / No / Not sure. Please provide supporting statement.]

No. There is insufficient detail of the different charging options referred to, or a comparison across these charges, or an estimate of the amount that would be raised, to come to any decision on this point. There are significant regional variations in the amount of value that a development might provide and concerns that areas with lower house prices and land values may not attract sufficient funding to support necessary infrastructure, there are serious concerns about access to investment for these areas. There is also no indication of how very long term strategic infrastructure could be delivered under this scheme.

Question 22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally? [Nationally at a single rate / Nationally at an area-specific rate / Locally]

Any infrastructure levy should be set locally. A nationally set charge for infrastructure would not take into account regional variations risking the non-delivery of infrastructure.

There needs to be more focus on the local community rather than regional distribution of funds. Funding for local schools and amenities is currently missed due to high level regional decisions.

Question 22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area? [Yes / No / Not sure. Please provide supporting statement.]

No. The developer, unlike with CIL, is not required to pay infrastructure contributions when they start the development. There are very real concerns in the current pandemic and economic recession that forward funding infrastructure could stretch local planning authorities to the point that they are required to borrow funds to meet the infrastructure needs of their community without the certainty that they will be reimbursed as the infrastructure levy would only be paid at the point of occupation, leading to borrowing risk.

Question 23. Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights? [Yes / No / Not sure. Please provide supporting statement.]

Not sure. There is some merit in applying a levy to PDR however we think that this should be based around the current CIL regulations where payment is made up front. There also needs to be far more regulation around PDR to ensure that well designed and sustainable housing is created, particularly when there is a change of usage from commercial to residential which will be far more prevalent in the future.

Question 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? [Yes / No / Not sure. Please provide supporting statement.]

No. We do not support a nationally set infrastructure levy.

The White Paper seeks to reduce the reliance on a few major developers by splitting development sites to enable smaller builders to help improve housing delivery, but again this runs the real risk of larger sites being split across multiple planning permissions or smaller sites creeping into the countryside with total housing numbers below the threshold required to deliver affordable housing.

What protection is this white paper giving to ensure that permitted affordable housing in local plans is delivered, and not later reduced in number at the reserved matters stage due to developers' objections on economic viability grounds?

How will this proposal genuinely improve housing affordability, other than attempting to flood the market, and the very difficult planning officer recruitment issues seen in the south east of England due to housing affordability?

Question 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? [Yes / No / Not sure. Please provide supporting statement.]

No. We do not support a nationally set infrastructure levy.

Question 24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk? [Yes / No / Not sure. Please provide supporting statement.]

No. We do not support a nationally set infrastructure levy

Question 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? [Yes / No / Not sure. Please provide supporting statement.]

No. We do not support a nationally set infrastructure levy.

Question 25. Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement.]

No. We do not support a nationally set infrastructure levy.

Question 25(a). If yes, should an affordable housing 'ring-fence' be developed? [Yes / No / Not sure. Please provide supporting statement.]

Question 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?

Whilst the digitisation of the planning process will make access to planning easier for those digitally aware, it potentially will discriminate against persons with disabilities who are unable to access digital plans, the older generation who are not so digitally aware and those who are unable to afford computers and personal broadband. The white paper is moving away from the traditional front loaded community consultation that takes place in village halls and libraries that bring communities together face to face for vibrant discussion and sharing grass roots level local knowledge. This is where real place shaping can take place and to exclude this element of plan making will be to the detriment of the local community and its future.

Yours faithfully

CRANLEIGH PARISH COUNCIL

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