



SERVING LOCAL COUNCILS IN SHROPSHIRE AND TELFORD & WREKIN  
Affiliated to the National Association of Local Councils

7th October 2020

Dear County MPs, Owen Paterson, Philip Dunne, Daniel Kawczynski, Mark Pritchard and Lucy Allan

### **Proposed Reforms to the Planning System**

I am writing to you once again seeking your support for our concerns over Government's 'new vision for England's planning system' set out in their white paper 'Planning for the Future' which was published on 6 August <https://www.gov.uk/government/consultations/planning-for-the-future>.

The White Paper claims to be about making planning clear and more accessible, setting out eight major changes to how planning will work. The most challenging is about how much housing will be built with plans for 300,000 new homes every year dictated via a new Government formula with no input at local level. Local authorities and communities will have no say in this which must be wrong and stands outside the democratic process.

Development identified in our current local plans will no longer be valid as a new style local plan will identify all land under three zones, Growth, Renewal and Protection whereby automatic permission will be granted in zones Growth and Renewal. Locally developed planning policies will be replaced by centralised policies within the National Planning Framework which again will give local authorities and communities no say whatsoever to influence policies against which applications are assessed.

We welcome proposals for the Protection zone that will safeguard our natural and historic environment. Also, those that aim to improve the design standards, but we cannot see how a national design code (which would give no opportunity for local input after it has been introduced for another 5 years) could work in a county that covers Shropshire, Telford & Wrekin with different design requirements. Local design codes therefore will have to be encouraged in order that some sort of local influence can take place. Why is more use not being made of brownfield sites, we ask?

Local input is further diminished in proposals to reduce the time it takes to develop the new local plan (30 months) by including only two 6-week time slots for consultation, with no further consultation until the local plan is reviewed after another 5 years. It will be even harder for local communities to be involved in what they need locally, such as good quality affordable housing, medical facilities, schools and parks. Active travel and the need to move to a more active lifestyle has no mention when, in the current climate walking and cycling are crucial.

Potentially, most damaging is the scheme for permitted development which was originally intended to allow for homes to add conservatories and outbuildings without planning permission. This will now see permission granted to convert multi storey office buildings, shops and restaurants into flats, all without consultation with disregard for minimum space standards or local design codes.

Proposals for a new infrastructure levy to do away with existing developer contributions (CIL and S106) which allow for affordable housing and infrastructure are largely welcomed as the current systems are acknowledged as clunky! However, we do recognise that our towns have relied upon S106 to meet

infrastructure needs for large development sites and proposals to abolish CIL will impact on our rural areas where they have received twice the level of CIL than urban areas. There are risks that a new levy will raise more money where land values are high and impact on areas such as land identified for regeneration where values are not so high. Government's push for first homes to buy over other types of affordable homes, such as social rented and shared ownership, will mean discounts for those able to buy but makes it harder for those who will never be able to afford to buy their homes. This will impact particularly on rural communities, which will have even less capacity to ensure affordable housing for their key workers and will critically undermine their sustainability. Obviously, at local level, we are concerned how this will impact on Shropshire Council's aspirations that 25% of housing up to 2038 will be affordable. We foresee land banking resulting in more accumulated permissions. At the very least, it is essential that there should be restrictions on developers for them to build within one year of planning permission to prevent land banking and those who don't comply are fined.

The new style local planning with top down development policies may mean that existing neighbourhood plans will be out of date resulting in loss of trust by communities who have worked hard and voluntarily to bring local aspirations into the planning process.

We find it hard to accept that climate change is hardly mentioned. The White Paper makes no mention of any requirement for local plans to pursue carbon emission reductions in line with the net zero target under the Climate Change Act and is silent on how national and local climate targets will inform the new local plans and planning decisions under the new system and this is a huge concern.

Building standards are a central component to achieving zero carbon homes but the Planning White Paper provides no clarity on whether local government will retain powers to set higher standards. If Government are intending that there will be some form of restrictions on local authorities' powers, then Government must be more open now on this crucial issue.

The white paper rightly places more concentration on design but should include planning for the creation of genuinely sustainable, resilient places, not just how buildings look, to require key climate and sustainability design elements for this new system to make sense in the context of a climate emergency. If the test for sustainable development does not meaningfully measure whether a new development will be zero-carbon, then it will not deliver sustainable places.

The Centre for Sustainable Energy (CSE) are working hard to develop a carbon footprint tool for parish and town councils. In addition, Climate Action Partnerships have been established in both unitary authorities in the County to develop good practice for our local councils to follow. The CSE has set out its concerns (with which we agree) in more detail, <https://www.cse.org.uk/news/view/2503>. They conclude that the White Paper as it stands does not describe a reformed planning system that will deliver the zero carbon, climate adapted future we need. Reforms on this scale could have been a revolutionary moment for local authorities, allowing them to comprehensively address the climate emergency through their crucial responsibility of guiding development and growth. Instead, we see the vague outline of a new system that threatens to leave them frustrated bystanders at best or, at worst, unwillingly complicit in climate destruction.

We consider the proposals to be a charter for developers and we fear planning authorities will lose control. The level of development growth proposed (300,000 houses to be built every year representing an 80% growth of housing allocations in a year) is most definitely not sustainable in the County. Some Shire counties are facing more than 140% increase. In Telford & Wrekin, the Council is currently planning for 17,280 new dwellings by 2031. Shropshire Council is no longer pursuing the massive garden village settlement at Junction 3 on the M54 and is working on a methodology in the current local plan review, with growth factored in for 1400 new houses a year, a total of 30,800 by 2038. Government's new methodology would see an increase to 2,129 a year in Shropshire where the biggest year on record over the last 10-15 years has been 1,900. The County town of Shrewsbury has absorbed much of the housing growth and it simply cannot

take any more. Increases of this size are a major concern and the allocation methodology should be called into question as should its evidence base, raising doubts that a formula was created to meet the Government's agenda.

The attached Briefing Paper has been forwarded to us by the CPRE, Shropshire and indicates the dramatic effect the proposed new standard method within the Government's '[Changes to the current planning system](#)' would have on our two Shropshire local authorities.

We have received an encouraging, well thought out level of support to our response from our local councils, some of whom I have encouraged to respond direct. I am attaching that received from Nash Parish Council as a representative response from rural Shropshire.

Some of our Members tell us the proposals are inconsiderate and a manipulation of the process in putting out such an important document for consultation during a pandemic with a very short response timescale.

On behalf of my Executive and Members, I bring these matters to your attention and would ask for your support in raising these concerns with Government.

Yours sincerely



Ray Wickson  
Chair  
Shropshire Association of Local Councils

Cc: Shropshire Council, Telford & Wrekin Unitary Council  
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