



**Rt Hon Robert Jenrick MP**

Secretary of State for Housing, Communities and  
Local Government  
2 Marsham Street,  
London, SW1P 4DF

**Rt Hon George Eustice MP**

Secretary of State for Environment, Food and  
Rural Affairs

29<sup>th</sup> October 2020

**Re: Planning White Paper**

Dear Secretaries of State

This letter is written on behalf of the Wiltshire Climate Alliance, a coalition of nineteen Wiltshire based groups who are active in campaigning for and developing local solutions to the challenges of climate change and ecological degradation.

We are writing to express our deep concerns about the current proposed planning reforms, which if enacted, we believe would undermine democratic engagement in the planning process and weaken protection for the environment and urgently needed climate change mitigation.

Planning is central to key national challenges, including the current Climate and Ecological Emergency, and any reform needs make climate change and the environment more of a priority, not less of one. Wiltshire Council has acknowledged a Climate Emergency, which includes seeking to make the county net carbon neutral by 2030, in which its Local Plan will play a critical role. It is clear to us that the reforms proposed in the White Paper would hinder rather than aid the Council, as Local Planning Authority, in realising this commitment.

**1. Failure to drive Carbon Reduction in line with the Climate Change Act**

The White Paper makes no reference to any requirement for local plans to reduce carbon emission in line with the Government's net zero target and or how national and local climate targets will inform the new local plans and planning decisions. The results would be that new local plans would not be consistent with a net zero carbon future, undermining the efforts Wiltshire Council and Wiltshire's business and residents are making, and 'locking in' carbon-intensive development. This is underlined by the objections raised by the Town and Country Planning Association (TCPA), the Centre for Sustainable Energy (CSE) and many others. The Woodland Trust has also pointed out the lack of consideration given to protection of irreplaceable habitats including ancient woods and trees, which would be under even greater threat under the White Paper proposals.

We believe that any reform of the planning system needs to put much greater emphasis on preventing global warming ('heating') and to take a more strategic approach to restoring natural assets and ecosystems, as set out in the Government's 25 Year Environment Plan. By integrating planning reform with climate change and nature recovery objectives, the Government will be in a position to deliver both better. As it stands, the White Paper is not only a missed opportunity but in conflict with Government's commitment to cut carbon emissions to net zero by 2050, as required under the Climate Change Act.

## **2. Reduced Local Engagement and Democratic Accountability**

As many authoritative planning representations have already pointed out, the White Paper starts from the false premise that the current planning system is the main barrier to meeting housing targets, rather than the failure of developers to build out on the permissions they already have. Hence the emphasis in the White Paper on speeding up housing construction by 'simplifying' the system at the expense of democratic participation and environmental protection, is misplaced and would take the planning system in the wrong direction.

According to the Town and Country Planning Association (TCPA): "Far from 'democratising planning', the White Paper positively reduces democratic accountability and the individual rights of the citizen to participate" (TCPA, September 2020). Wiltshire's citizens will lose their ability to be informed of, consulted about, influence and make representations on planning applications which affect them, large or small, which will simply be removed within the proposed Growth Zones. Democratically elected representatives on the Council would also have their participation and influence removed in Growth Zones because, according to the White Paper, "this adds delay to the process." Even the ability to appear before and be heard by an Inspector at a public enquiry [Section 20(6) of the 2004 Planning Act] would be removed by the proposed Bill and replaced by the "possibility" that a Planning Inspector might make contact by phone, adding further to the democratic deficit.

The automatic outline permission that would be granted in Growth Zones would also work against valuable local inputs and participation in planning through Neighbourhood Development Plans (NDPs), which would either be over-riden or unable to be implemented, in Growth Zones where automatic permission would be in place. Wiltshire Council has one of the highest numbers of NDPs of any county and the Wiltshire Climate Alliance supports Wiltshire Council's position on NDPs' importance and value in the plan making process.

## **3. Unsustainable Development and Removal of Environmental Protections**

In addition to this erosion of democratic process, the White Paper would also promote *unsustainable* development, particularly in rural counties such as Wiltshire, by separating new homes from jobs and services, in places where public transport is limited and active travel impractical. Designating growth zones would result in urban expansions and larger commuter towns, locking in car dependency and generating substantial (otherwise avoidable) carbon emissions.

Transport is now the largest emitting sector of the UK economy, with emissions from car travel alone representing 15% of UK greenhouse gas emissions in 2017<sup>1</sup>. According to the UK's Committee on Climate Change it is critical to ensure housing development is located so as to minimise the need to travel for employment and shopping and to reduce the need for car travel for these purposes. The Committee points out transport needs to be properly considered as part of the planning process,

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<sup>1</sup> <https://www.theccc.org.uk/wp-content/uploads/2019/02/UK-housing-Fit-for-the-future-CCC-2019.pdf>

rather than creating large scale, new housing development designed around car use. By pushing new homes so far away from jobs and services, in places where local employment is missing and public transport very limited, the White Paper proposals would create even more car dependency and commuting.

The White Paper also proposes to scrap Sustainability Appraisal and Strategic Environmental Assessment (SEA) and replace it with a simple test of 'sustainable development'. We believe that now more than ever, minimising the environmental, including climate change, impact of new development is absolutely critical. The proposed requirement for local plans to set out local specific development standards, as opposed to general policies, would make it even more important that environmental impacts are properly considered upfront. Consolidating or in any way reducing the requirement to undertake and attribute weight to existing environmental checks and balances, would reduce rather than enhance the ability of the planning system and Wiltshire Council's Local Plan to respond to the Climate and Ecological Emergency.

Additionally, to do anything other than comply with the SEA directive (as is currently done) would be inconsistent with the Government's commitment to upholding environmental standards after 1<sup>st</sup> January 2021<sup>2</sup>. It would reduce the level of environmental protection at the crucial early plan making stage, which helps prevent environmental damage having to be mitigated at later stages by considering less environmentally and climate damaging alternatives. Cutting out SEA also flies in the face of research that shows SEA to have positively influenced development plans, not only in terms of protecting valuable natural assets but in plan making in general.

The suggestion of a consolidated sustainability test also raises the question of how an EIA would work under these proposals. It is far from clear whether EIAs would be possible under the new system, since there would be automatic outline permission, and planning applications would not be required in growth zones. With EIA and SEA conducted at two very different stages of the plan making process there is already a lot of efficiency in the way SEA informs EIA. It is therefore our view that a consolidated test could only be of value to those who would rather avoid proper assessment and consideration of environmental and climate change impacts, as is currently required by SEA and EIA legislation, and would not be in the public interest.

We also believe that the term 'protected zones' as used in the White Paper, is a misnomer. In these areas, development would still be permitted, and developers could still apply for planning permission, so there would be no strengthening of existing protections. Moreover, if critical environmental assessments such as SEA and EIA were watered down or removed entirely, safeguards against development on existing protected sites would be further undermined

## **Conclusion**

We believe the proposals in the White Paper take power and influence from local communities and local authorities, and hand it to developers and the private sector, working against public interest and the valuable democratic principles that have underpinned the planning system since the introduction of the Town and Country Planning Act in 1947.

The proposals would promote unsustainable development, particularly in rural counties such as Wiltshire, separating new homes from jobs and services, in places where public transport is limited

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<sup>2</sup> <https://www.gov.uk/guidance/upholding-environmental-standards-from-1-january-2021>

and active travel impractical, creating expanded commuter towns and ongoing car dependency, all of which undermines the Government's and Wiltshire Council's net zero carbon targets.

The proposals would also undermine important environmental protections that are needed more than ever in the face of the Climate and Ecological Emergency. The result would be a less democratic and more environmentally damaging planning system, resulting in poorer quality development, increased carbon emissions and a loss local input, trust and buy-in to the way our towns and villages are shaped.

We therefore recommend the White Paper is scrapped and a review of the planning system undertaken in conjunction with the Department for the Environment and Rural Affairs. Further details of our concerns on specific aspects can be found in our response to the Planning for the Future consultation, which we'd be happy to provide you a copy of. We would also be happy to provide further input into what is required from Government to develop a better planning system and a sustainable and resilient future.

Please do not hesitate to get in touch.

Yours Sincerely,

***Nick Murry***

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For and on behalf of the Wiltshire Climate Alliance