

## **WRITTEN EVIDENCE SUBMITTED BY THE BIOABUNDANCE COMMUNITY INTEREST COMPANY**

### **ENVIRONMENTAL SUSTAINABILITY AND HOUSING GROWTH**

**DRAFTED BY DR ROBERTS, CHAIR OF BOARD OF DIRECTORS, BIOABUNDANCE**

Thank you for this opportunity to provide evidence on a matter that is the very focus of interest for Bioabundance Community Interest Company. We present case studies and commentary to show that the revisions to the NPPF will not have the intended consequences of making homes more affordable and available; and will certainly not protect or enhance nature. We are based in South Oxfordshire, in an area where more homes have been built than anywhere in the country. House prices have increased stratospherically; nature has decreased; our carbon budget is running out.

The re-introduction of the 5y housing land supply rule will take us back to the wild west of speculative house-building. High building targets and increased housing supply do not reduce house-prices for reasons that include the fact that building rates slow down as the market slows. The NPPF patently provides no protection for nature, there is constant compromise of any environmental aims from putting building first. BNG (biodiversity net gain), whilst a welcome step forward, might mitigate some harm but will never restore the natural world. Newbuild development stops growth in sectors where it is needed by taking resources from retrofit, nature and good farming. Centralised imposition of growth on resident populations is the antithesis of democracy.

#### **WHO WE ARE**

Bioabundance comprises 200 groups and individuals, including parish councils; community action groups; planners, ecologists, climate scientists and other experts; and individuals from all levels of government (except the House of Lords). We aim for the restoration of Oxfordshire's nature to its best state since 1970; for climate adaptation, resilience and mitigation; and for the wellbeing of current and future generations. Members have contributed to and approved this response; and would gladly help your Environmental Audit Committee however they can.

Sue Roberts (DPhil Zoology) is currently on the Policy Group of the Oxfordshire Local Nature Partnership; and lectures at the National Residential Landlords Association on Retrofit for Energy Efficiency. She served as a South Oxfordshire District Councillor, 2019-2023, sitting on the People and Places Board at the Local Government Association, and representing Council on the Oxfordshire Local Enterprise Partnership Board and the Oxfordshire Plan Development Group.

#### **RESPONSES TO QUESTIONS (questions summarised)**

##### ***1. How will the revised NPPF protect and enhance nature? Are provisions adequate?***

We are extremely worried about reversals in the NPPF. The impact of these changes will devastate nature. To date, the NPPF has NEVER protected and enhanced nature. Since 2012, when the previous planning laws were replaced by the developer-led (and written) NPPF, there have been devastating declines in the natural world in our country. Provisions are clearly inadequate.

##### ***2. What policy levers do Local Authority's (LAs) have to deliver under the new standard method? Will they be penalised if they fail? How will they bring development on-stream?***

It appears that the Government intends to ensure that the new standard method numbers are achieved through the re-implementation of the grossly unfair 5y-housing (land) supply rule (5y HLS). This rule is widely-misunderstood. It requires sufficient housing to come on-stream, whereas many people wrongly believe that it requires sufficient land to be allocated for housing. If Local Authorities (LAs) cannot prove that “spades are in the ground”, to ensure that the next 5-years of house-building will meet the targets; they will fail the rule. This is irrespective of whether they have allocated sufficient strategic sites.

When delivery falls short and new land is grabbed by developers, it is the local population (and LAs) who are penalised. They lose environmental security in terms of a robust natural world and fertile food-producing land, as swathes of concrete use up land and fragment the landscape.

LAs have no levers through which to force developers to build: they and we suffer when developers drag their feet. This is why Michael Gove dropped the 5y HLS rule in December 2023.

#### CASE STUDY 1: INIQUITY OF 5Y HLS - SOUTH OXFORDSHIRE

Despite a change in the political makeup of South Oxfordshire District members, we were forced by the Secretary of State (SoS, Robert Jenrick) to continue with a Conservative plan for 3-times the number of homes that our growing population could fill; and this, despite our will to withdraw the Local Plan. Land for 30,000 homes was allocated against our (forced) target of 23,500. The Inspector passed the plan as sound. Within 6 months we had failed the 5y HLS; and a ‘retirement community’ was permitted at Little Sparrows in Sonning Common; in the then Area of Natural Outstanding Beauty (now National Landscape). This was followed by permissions to build on the site of an ancient forest near Didcot.

#### CASE STUDY 2: DEVELOPERS DETERMINE SPEED OF BUILD-OUT - WALLINGFORD

In Wallingford, Oxfordshire, 555 homes are being built out at ‘Highcroft’ by Berkeley Homes. We were told build-out would take 7 years, but if the market slowed, then building would stop. The land was allocated 14 years ago in the 2012 Core Strategy. In the 7 years since outline planning permission was granted (in 2017), one quarter (147) of the homes have been built and occupied; not 555. Ironically ‘Winterbrook Meadows’ in Wallingford was obtained via a hostile bid through the 5y HLS rule for development by Berkeley Homes, who themselves were creating a shortfall by failing to build at Highcroft. At Winterbrook Meadows, outline planning was received in 2019. To our knowledge, not one single home has been occupied in the ensuing 5 years.

### ***3. How far can favouring development be compatible with the ‘environmental objectives’ of the planning system? Will streamlining the presumption for development and environmental targets and obligations be successful?***

Nature CANNOT be restored through development. Locabel enhancements can be made, but land can never reach its full potential once it has been concreted over. The “island effect” is poorly understood by lay people. Every estate, and its roads, and its infrastructure, immediately bisect land across which nature could previously roam. To restore nature, we must follow the Lawton principles: “bigger, better, more joined-up”. The likely consequences of ‘Streamlining’ are terrifying, and contrary to environmental targets and obligations.

Returning to CASE STUDY 2; Berkeley Homes decided not to provide a new two-mile long sewage pipe out to Cholsey Sewage Treatment Works, but instead to piggyback on existing infrastructure (combined sewage and runoff pipes) in the heart of the old Saxon town of Wallingford. This has been a complete disaster. There have been frequent leaks of sewage into Bradford Brook, and at this current time (December 2024) a main arterial road is shut indefinitely whilst Thames Water deal with a fountain of pumped sewage-water in the carriageway.

#### CASE STUDY 3: POOR DECISIONS - LAND NORTH OF BAYSWATER BROOK (LNBB)

1100 homes were allocated at LNBB in the plan published by South Oxfordshire District Council in 2020 (forced upon us by the SoS). Planning permission was granted last month for 1450 homes despite objections by the Environment Agency (EA). EA are concerned about flood risk as the homes are in the flood plain, and sewage, as the Oxford Sewer to which the homes will connect is already operating illegally. One additional home, means additional illegal sewage. Locals are worried about flooding as neighbouring Barton has flooded this year and will suffer from the depleted floodplain. LNBB is an extremely sensitive site for nature and the homes are to be built in the field adjoining Sydlings Copse: a nature reserve with rare habitats. Ironically, council officers were relieved that this totally inappropriate, nature-wrecking plan had gone through; the pressure to meet targets is that great.

**4. How will the NPPF deliver and combine the social and environmental benefits of the planning system, eg access to essential amenities, public transport and active travel? NB we focus here on the main aims of the planning system.**

The chief purpose of the planning system is said to be to provide affordable homes. It does not. Homes in our country are unaffordable for several reasons, but physical supply is not one of them. Houses are regarded as assets by UK and overseas investors. They are used as second homes and empty "money-boxes"; and to launder money. Whilst we have a near-infinite market, building homes will not reduce their price. CASE STUDY 2 shows how developers stop building when the market slows: they do not reduce prices.

Not that Increasing supply even would reduce prices. The Economist (8 August 2024) says:

*"hitting the 1.5m target would have only a limited effect on home values. An additional 1.5m homes is equivalent to 6% of housing stock so, all things being equal, prices would fall by 12%. But the country is already adding about 1.2m new homes every 5 years, so an additional 300,000 homes might skim 2.5% percentage points off house prices. And other things are never equal. According to the housing ministry's guidance, a two-percentage-point fall in interest rates pushes house prices in the other direction by six percentage points."*

Ian Mulheirn (Chief Executive of the Nuffield Foundation [Jan 2025]) makes the distinction between the cost of housing people (which is the rent, or the 'imputed rent' in the case of owned-homes) and the acquisition of housing as an asset. He comprehensively shows that these actual costs of housing people have not risen; it is housing subsidies that have been depleted; thus: *"the economic cost of housing has remained broadly stable relative to household incomes [for the past 45 years], it's just that the transfers that used to insulate households from that economic cost have been eroded"*. (<https://medium.com/@ian.mulheirn/housing-affordability-since-1979-fe18d32f0250>).

#### CASE STUDY 4: SOUTH OXFORDSHIRE HOUSING AFFORDABILITY AND SUPPLY

According to the Office for National Statistics, between 2005 and 2012 the ratio of house prices to median residents' earnings stayed steady at 7-8 in South Oxfordshire. Building furiously in response to the 2012 Core Strategy, and then to the 2018 Growth Deal, and then to the 2020 Local Plan, by 2024, 11,000 homes had been built, a 20% increase in housing stock. The affordability ratio didn't go down. It went up, to 11-12. South Oxfordshire has certainly done its bit (<https://www.oxfordshirelive.co.uk/news/oxfordshire-news/oxfordshire-one-areas-most-new-6552897>); with Vale of White Horse next door it has built the most homes of anywhere in the country. Increased supply has not increased affordability. Rather, we believe that rapid building draws the attention of international investors and increases inward migration to the district - a growth that disadvantages local people.

The second reason for building homes is to achieve growth - with a churn in the buying and selling of homes, and in employment for building. This is clearly stated as the Government's main motivation. The people of Oxfordshire have roundly condemned the push for growth. They have influenced the thinking of the Local Enterprise Partnership (OxLEP) and caused the demise (at

least temporarily) of the concept of an urbanised and industrialised zone between Oxford and Cambridge. This is in great part due to the work of Stop the Arc (<https://stopthearc.org>), who have pulled together the voices of thousands of Oxfordshire people.

The Oxfordshire Doughnut Economics Collective has been set up to follow Kate Raworth's model (Oxford University; <https://doughnuteconomics.org/about-doughnut-economics>), already adopted by Cornwall, Shropshire, and places across the world. The Doughnut aims for us to live in the sweet spot for humanity, keeping within planetary boundaries, but ensuring social justice for all (which definitely includes having safe, secure accommodation). Kate Raworth says we should be *agnostic* about growth, but purpose-driven in securing a safe future.

The Labour Government would like to see growth. There are two areas where growth is urgently needed: both with high labour-demand; and both impeded by focussing resources on housebuilding.

GROWTH POINT 1: For safe secure accommodation with low bills and low carbon emissions, we need urgently to retrofit the 29 million homes in our country for energy efficiency, and renewables. Retrofit jobs are necessarily 'place-based'. But we have a labour and materials shortage. Workers should be redirected from developing damaging new-builds to making good existing homes. In the process, poor-quality housing can be brought back into use, and large homes can be subdivided, enabling older people to realise their asset without losing their home. Bioabundance Community Interest Company call this 'custom-splitting' or cusping.

GROWTH POINT 2: We need to restore our natural world; with an army of individuals working physically in nature, and in policy-making and knowledge provision. We need to transform agriculture to the growing of organic arable and vegetables, and vastly to reduce the amount of meat and dairy that is consumed here, or produced for overseas use. Without these measures, nature will not recover, and "without nature, there is no food" (RSPB Jan 2024, <https://www.rspb.org.uk/whats-happening/news/without-nature-there-is-no-food>).

#### CASE STUDY 5: KNEPP FARM, SUSSEX

Knepp has given its land over to natural regeneration, using large herbivores to keep the land open. It has been an amazing success, bringing back species on the brink such as turtle doves, storks, and the purple emperor butterfly. Far more people are now employed on that land relative to when it was a cattle-farm: in tourism: providing safaris, managing the camp site and shop; and in the renting out of units converted from cattle sheds.

GROWTH POINT 3: Of course, other growth points are urgently needed; in all the areas that have been dragged down by austerity; such as the law, civil servants, and the provision of well-paid, high-status jobs in caring roles. With immigration levels up near 1,000,000 per annum, we should be changing our attitude to such jobs, and rather than poaching professionals from developing countries, we should make such work appealing to our own residents. High levels of immigration are a political decision which do not fit well with limits to growth that our land sets upon us.

All three growth points provide good, sustainable work, that would reinvigorate our country's economy.

#### **5. How can the NPPF meet Government targets to reduce greenhouse gas emissions in respect of embodied and operational carbon?**

Turbo-charged house-building is not compatible with reducing greenhouse gas emissions.

#### CASE STUDY 6 EMBODIED CARBON IN NEWBUILD HOMES

Taylor-Wimpey suggest 250T of CO<sub>2</sub> equivalent are produced for every home built, with accompanying relevant infrastructure. That would take 12,500 mature (30y old) trees a year to absorb; from a single house-build. To take up emissions from building 330,000 homes in England would take 4 billion trees. There are 280 million trees in England and Wales, so making Wales also responsible for England's emissions would mean we are still 14-fold under what we need, tree-wise, to absorb emissions.

It is grossly misleading for the NPPF to imply that building can reduce carbon emissions, when every newbuild releases this huge bolus of carbon. In 2020, the Tyndall Centre calculated the maximum fair share of CO<sub>2</sub> each district might emit, if we are to keep global warming under 1.5°C. For South Oxfordshire, that was 5.6Mt. The draft Local Plan for South Oxfordshire shows we have used up 3Mt since 2020, whilst building around 4000 homes (releasing potentially 1mT). Construction has therefore been responsible for ONE-THIRD of our emissions since 2020 (1Mt of 3Mt).

Courageously, South Oxfordshire District Council wishes to reduce construction emissions, to 80T per home for the outstanding 13,214 homes to be built; emitting 1Mt - over a third of our remaining budget of 2.6Mt. WITHOUT this policy, we would massively break our budget, by over a quarter, emitting 3.3Mt CO<sub>2</sub>.

The former Government made it unclear (once again) as to whether LAs could set higher standards for carbon emissions than those in building regulations. Ministerial statements have denied this democratic right, firstly from Eric Pickles in 2015 (although Core Strategies already in place could not be gainsaid), and then from Lee Rowley in 2023.

(Let us not forget the importance of remaining under 1.5°C. Recent studies indicate that we have already reached it, and are into unstable territory from which we cannot return. This year, the US was hit by the two biggest storms ever; massive flooding in the UK has reduced agricultural output by an estimated 30% and caused untold misery in Oxfordshire. With this, and breadbasket failures around the world, food price inflation is contributing to hunger in our country. These problems will worsen as the planet heats.)

The NPPF does not address the need to eliminate construction carbon.

For operational carbon, the Future Homes Standard (FHS) has still not been produced! The first consultation was in 2019 and it is due for publication next year (2025). Given that 2016 was supposed to be the year by which all new homes would be built to be net zero carbon in operation (a target abandoned by Amber Rudd in 2015); FHS will be 9 years late; hardly a response to a climate emergency. Sadly, FHS does not specify Passivhaus; or zero carbon. In a sense, this is immaterial, as the emissions from new house-building will (unless reduced) take us over the edge.

## **6. Will LAs be able to protect the natural environment?**

We think not, at Bioabundance Community Interest Company. Oxfordshire is in the process of creating a Local Nature Recovery Strategy, which aims to provide nature recovery networks. But it has been hesitant, again, with the council looking over its shoulder at what the Government's growth agenda might require. There are statements in the draft that say that development can enhance the environment. It cannot ever allow the land, with fragmentation and land lost to concrete, to achieve its full potential. See CASE STUDY 3 on Sydlings Copse, where the Bayswater Brook itself should be a channel of nature and not built upon.

## **7. Are these happening: (a) environmental improvements; and (b) a working BNG market? How are LAs using BNG for nature?**

Our experience of BNG is that farmers do not understand it (it is very complicated) and are loathe to be tied into a weird market mechanism that puts such strictures on their land. Worst, if you were

to apply for BNG you would have to stop improvements that you might otherwise have made through, for example, the Countryside Stewardship Scheme.

BNG is not a big player as a market mechanism in Oxfordshire at the moment: *“the vast majority of the benefits of net gain...are being delivered through promises of small, high-quality habitats many years in the future, within the development footprint. If these promises...do not materialise... then net gain might be associated with a considerable loss of green-space which might actually harm nature overall,”* writes Dr Sophus zu Ermgassen (Oxford University).

Professor David Rogers (Oxford University, retired ecologist) has shown how taking up any piece of land; and ‘replacing’ it with an improved equal sized plot, whilst for now replacing the lost ‘revenue’ of natural life, forever loses you the ‘stock’ of land; it has disappeared under concrete. Dr Richard Benwell (Wildlife and Countryside Link) states that nature will not be improved by 10% BNG; such a level is set only as a buffer to attempt to prevent loss.

### **8. How will the revised NPPF implement the Nature Recovery Network and Local Nature Recovery Strategies (LNRSs)?**

Oxfordshire’s LNRS (consultation recently closed) and its nature recovery network, would not be sufficient to prevent development from further fragmenting the landscape and polluting nature. The LNRS buffer zones are very small and would not realistically protect nature.

*Bioabundance would be very happy to share its commentary on the Oxfordshire LNRS consultation with the Committee, on request.*

### **9. How can LAs use the developing National Land Data Framework to plan for nature? How should the NPPF be integrated into the forthcoming Land Use Framework?**

Bioabundance is very keen to see a Land use Framework. We need a realistic understanding of how to reverse the decline in nature, fit in renewable energy infrastructure, have organic farms. Our future is looking dire: farming is at a low ebb and floods and droughts are devastating our lands. It is nature that can restore floodplains and reduce the impacts of climate change. Under current market mechanisms there is no restraint on whatever is making money.

#### CASE STUDY 7: SOLAR FARM, WEST BOTLEY, OXFORDSHIRE

Three to four square miles of solar panels are proposed for West Botley in Oxfordshire. Is this the best use of this land? Would nature be restored BETWEEN the panels as well as around them? Without that, we have another blockage to nature, fragmenting the landscape. Could we do enough with just rooftop solar? This is a National Infrastructure Policy but is set in isolation with other competing purposes for the land. Locals have found governance issues with the owners, broadcast also in *Private Eye* magazine. With such lucrative projects as these, will the best decision be made for our limited land resource to ensure a liveable future for us? We do want to see the long-awaited Land Use Framework.

The NPPF should clearly state that nature comes first (fragile as it is and in catastrophic decline). No homes should be built anywhere near the nature recovery networks. This could be made clear in the Land Use Strategy; ensuring that nature recovery areas take up sufficient space to be bigger, better, and more joined up.

Local Plans do not show the totality of housing sites to be developed, but only those allocated by that plan. It is not possible to gauge the scale and positioning of house-building and so, not easy to plan for nature recovery. Local Plans should show all development sites including those from 5y HLS land-grabs.

#### CASE STUDY 8: WINTERBROOK MEADOWS, WALLINGFORD

South Oxfordshire District Council's draft Local Plan shows the strategic sites for development but not sites that were allocated via hostile bids and the 5y HLS. In Wallingford, this is 505 homes at Winterbrook Meadows; a big development in a town that started at 3200 homes in 2011. However, you cannot see where all the development is from the maps. This should be changed, with all development made visible.

#### PROPOSAL: NEW REGIONAL NATURE PARK

Bioabundance Community Interest Company has proposed a Regional Nature Park (which itself would be a new nomenclature): 100 sq miles shared between Oxfordshire and Buckinghamshire and including Otmoor Nature Reserve, the ancient forests of Bernwood, Stowood and Shotover, the Ray wetlands and the Brill Hills: an area large enough to be resilient, and to provide access to nature for 300,000 people in Oxford and the areas developing to the north of it. These SWATHES of nature need to be soundly incorporated into the Land Use Framework.

#### **10. Which DEFRA environmental and planning regulations will be reviewed as growth inhibitors? What effect would reforming these have on nature?**

This is a slippery slope. Environmental regulation should be being beefed up and not seen as 'inhibitors of growth'. Growth should be in areas where we need growth (see question 4) and not in the built environment.

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