

Submitted to Levelling-up and Regeneration Bill: Reforms to National Planning Policy  
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What is your organisation?

Organisation:  
Churn Churches Climate Action Group

What type of organisation are you representing?

Chapter 3

1 Do you agree that local planning authorities should not have to continually demonstrate a deliverable five year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than five years old?

Yes

Please set out the reasons for your answer:

YES - we support the scrapping of the 5-year Housing Land Supply (5y HLS) rule. It has enabled developers to build on inappropriate sites with no regard to biodiversity or food production.

But we do not support the update condition. To require Councils to update their housing requirement every 5 years is good but they need RESOURCE for this. Penalising them with the unfair 5y HLS rule is wrong.

2 Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?

Yes

Please set out the reasons for your answer:

We believe the 3y Delivery Test should be scrapped. Otherwise it simply replaces the 5y HLS as the new tool for developers to force unneeded and unwelcome overdevelopment on communities.

3 Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on?

Yes

Please set out the reasons for your answer:

It is the total number of homes that matters and this should match households. In climate and nature crises we cannot afford to waste land on unneeded and second homes. Our natural population is levelling off (no growth). New homes from now on will be needed only for growth through immigration. We need clear sight of Government policy on immigration to plan housing.

We are glad that the Standard Method will not be required to be followed. However, in previous times despite ministerial statements that SM was non-mandatory, Inspectors still insisted on it. The inspectors must not be allowed to support un-needed housing.

Or is there an alternative approach that is preferable?:

There should be a measured consideration of wellbeing environmental constraints. Up to date ONS predictions should be used by planners taking into consideration wellbeing and the environment rather than inflating numbers to fuel aspirations for 'growth in GDP whatever the consequences'. The planning data should be based on improving The Doughnut Economic Profile of the locality. See <https://www.kateraworth.com/doughnut/>. Sometimes de-growth in housing may be required (as in other European countries).

To increase the supply of homes, councils should look first to existing build to see if it can be adapted - retrofitted for energy efficiency and split into appropriately sized units. Increases in housing density and a reduction of unoccupied accommodation must be encouraged. No speculative development outside of NDPs and LDPs should ever be allowed.

4 What should any planning guidance dealing with oversupply and undersupply say?

Answer:

Both oversupply and undersupply should trigger a reassessment of housing needs to limit future growth to the locally required mix of social and market value housing.

5 Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?

Answer:

No speculative development outside of NDPs and LDPs should ever be allowed.

#### Chapter 4

6 Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?

Yes

Please set out the reasons for your answer:

The framework should be absolutely clear that planning must support the decarbonisation programme to reach net zero by 2050 and enable nature recovery.

A Land Use Strategy is needed at national level. The House of Lords has called for a Land Use Commission. The Land Use Strategy would look at the total energy supply needed from offshore wind, hydroelectricity, tidal power, wave power, and interconnectors with other countries, and then look at how much solar and onshore wind we need to make up the balance. A national strategy should distribute requirements for solar towards the south and wind towards the north and west. Important farming areas and wildlife refuges would inform the final strategic distribution. Local Development Plans should then allocate land for solar and wind in just the same way as it does for housing. The Land Use Strategy would work down through councils to the allocation of land for food, wildlife, and flood and fresh water management.

7 What are your views on the implications these changes may have on plan making and housing supply?

Answer:

The changes are beneficial. We should keep a close eye on housing supply not to build outside our environmental constraints: to repair, re-use and re-cycle homes whenever we can and to restore land for nature and use it for decarbonisation.

8 Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs?

Yes

Please set out the reasons for your answer:

The impact of the Climate Emergency constitutes exceptional circumstances throughout the Country. Our future plans must as a priority focus on our legal obligations to net zero by 2050. Full assessments must be made on the wellbeing and environmental impact of our local plans.

The now obsolete standard method still uses vastly out-of-date population projections from 2014. The natural growth rate (without migration) of our population is tending to zero. Later projections from ONS showed far slower rates of population growth than was anticipated in 2014. These 2014 projections force unneeded development on our populace. It is wrong to do this when we have climate and nature crises. We must not allow new homes to be built unless the infrastructure of sewage, public transport, schools and GPs is already in place.

Housing numbers must take into account environmental constraints during this catastrophic collapse of the natural world. If nature vanishes, it takes humankind with it. We should in all things have regard for the wellbeing of future generations.

Are there other issues we should consider alongside those set out above?:

9 Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out-of-character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?

Yes

Please set out the reasons for your answer:

Agree!

10 Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out-of-character with the existing area?

Please set out the reasons for your answer:

They must show clear evidence of the present shortage of housing, that plans to increase the occupancy of existing housing are not appropriate and that the infrastructure will support the proposed increased density.

11 Do you agree with removing the explicit requirement for plans to be 'justified', on the basis of delivering a more proportionate approach to examination?

No

Please set out the reasons for your answer:

Examination by an inspector not related to the area should be abolished. It is for the community to decide what housing, and what standard of housing, it requires. We must abolish the planning inspectorate, and the right of the Secretary of State to override the wisdom of local people.

12 Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation?

No

Please set out the reasons for your answer:

The immediacy of the climate emergency is becoming more apparent day by day. We must make every effort to ensure that all new homes conform to high environmental standards whether or not the development was commenced before the scale of the emergency was recognised. Otherwise we are simply adding to the retrofit problem.

If no, which if any, plans should the revised tests apply to?:

13 Do you agree that we should make a change to the Framework on the application of the urban uplift?

No

Please set out the reasons for your answer:

Need is what we should be considering. Re-use and adaptation of existing housing should be considered before any land-take for new housing. There is no need for urban uplifts.

14 What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?

Please set out the reasons for your answer:

There is no need for urban uplifts. Re-use and adaptation of existing housing should be considered before any land-take for new housing.

15 How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?

Please set out the reasons for your answer:

It is wrong that housing should be dumped on neighbouring districts. If homes are needed in a city, that is where they are needed. We must not increase commuting.

16 Do you agree with the proposed four-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply?

No

Please set out the reasons for your answer:

Councils with an 'out-of-date' plan should not be subject to speculative development. There should be no need to show a rolling housing (land) supply (HLS). The 5y HLS rule is to be scrapped - please do not introduce a 4y HLS rule

If no, what approach should be taken, if any?:

Local plans should be paramount.

17 Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?

Indifferent

Please set out the reasons for your answer:

18 Do you support adding an additional permissions-based test that will 'switch off' the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?

Yes

Please set out the reasons for your answer:

We should abandon the presumption in favour of development. All decisions should be weighed against the Wellbeing of Future Generations.

So is a new development needed to house people? Are there empty homes in the area that should be brought back into use? Have other re-use and restoration options been looked at first for existing buildings, including retrofitting them for resilience against and mitigation of climate change and splitting them into appropriately-sized units. How will any newbuild genuinely improve nature and lock up carbon-dioxide to reduce carbon dioxide in the atmosphere?

It is time Government took control of remote ownership of homes and applied a test of all homes-sales being for people living or moving to an area.

19 Do you consider that the 115% 'switch-off' figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?

No

Please set out the reasons for your answer:

The Housing Delivery Test should be scrapped.

20 Do you have views on a robust method for counting deliverable homes permissioned for

these purposes?

Please set out the reasons for your answer:

Our natural population growth is levelling off at zero.

21 What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results? Please set out the reasons for your answer:

The Housing Delivery Test should be scrapped.

## Chapter 5

22 Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions?

Yes

Please set out the reasons for your answer:

The calculation of rates should be revised so that the management of social housing becomes more affordable.

If yes, do you have any specific suggestions on the best mechanisms for doing this?:

23 Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people's housing?

No

Please set out the reasons for your answer:

Is it better to encourage multi-generational housing and for older people to live within communities.

24 Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

Answer:

There should be no specific encouragement for housing on specific plot sizes.

25 How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?

Answer:

The use of small sites should not be encouraged. What is needed is greater population density in existing housing and brownfield areas.

26 Should the definition of "affordable housing for rent" in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and almshouses – to develop new affordable homes?

Yes

Please set out the reasons for your answer:

The Viability Clause should be removed - a 20% guaranteed profit for developers keeps land-prices high and prevents affordable and zero-carbon housing being built.

27 Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?

Answer:

28 Is there anything else that you think would help community groups in delivering affordable housing on exception sites?

Answer:

29 Is there anything else national planning policy could do to support community-led developments?

Answer:

30 Do you agree in principle that an applicant's past behaviour should be taken into account into decision making?

Yes

Please set out the reasons for your answer:

Failure to build the number of affordable and social housing agreed when planning permission was granted should debar a developer from permission to work new sites.

If yes, what past behaviour should be in scope?:

Failure to build the number of affordable and social housing agreed when planning permission was granted should debar a developer from permission to work new sites.

31 Of the two options above, what would be the most effective mechanism?

Not Answered

Please set out the reasons for your answer:

Are there any alternative mechanisms?:

32 Do you agree that the three build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly?

Not Answered

Please set out the reasons for your answer:

Do you have any comments on the design of these policy measures?:

Chapter 6

33 Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?

No

Please set out the reasons for your answer:

The specification of 'beauty' can give local planners the authority to indulge their personal idiosyncrasies. Beauty is in the eye of the beholder. Surely, 'fit for purpose' is a more appropriate test.

Far more important would be to insist that infrastructure is in place to create happy communities without harming the environment. Such as:

1. In our area it is not possible for incomers to register with a GP, they are all full - new residents are forced to go to A&E.
2. Sewage is being disgorged into the dying Thames. New housing is being added to already failing systems. It should be required that sewage treatment upgrades take place in advance of new building development.
3. Traffic is congested whilst public transport is being run-down. There is no vision for a new communication system free of cars, whereas the Government's Select Committee for Science and Technology (2019) states "widespread personal vehicle ownership does not appear to be compatible with significant decarbonisation."
4. Fresh Water can be provided in the South East for huge population increases through environmentally damaging new infrastructure. Or, we do not need to build so many houses in the South East, but could 'level-up' and bring new housing to wetter places.
5. Nature Havens, a nature recovery strategy, nature recovery networks, planned access for people to countryside - all this should be in place before any new building is planned. Building should work around nature not allow nature to suck up the remnants.
6. Flood Prevention should be in place.
7. Educational Establishments should be built before families with children move into their new houses. In our area very young children are having to go to schools in different communities from their homes and their siblings.

34 Do you agree to the proposed changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word 'beautiful' when referring to 'well-designed places' to further encourage well-designed and beautiful development?

No

Please set out the reasons for your answer:

Beauty is too subjective and allows planners and inspectors to indulge their personal perspectives.

35 Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?

Indifferent

Please set out the reasons for your answer:



36 Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing Framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes?

No

Please set out the reasons for your answer:

Upward extension to create extra accommodation is a good aspiration. But Mansard Roofs are energy efficiency nightmares should be to zero-carbon build standard for construction and operation.

Chapter 7

37 How do you think national policy on small scale nature interventions could be strengthened? For example in relation to the use of artificial grass by developers in new development?

Answer:

We should be retaining and restoring and enhancing all scraps of land for nature, creating nature corridors to enable animals to move from one area to another, creating nature recovery networks and swathes of land for nature. Even small patches of land can be beneficial to nature. Interspersed amongst homes; nature on these sites is accessible in an urban environment. We should not be seeking to fill in plots or encourage windfall. Developers should provide a real living environment within and around developments.

38 Do you agree that this is the right approach to making sure that the food production value of high value farm land is adequately weighted in the planning process, in addition to current references in the Framework on best and most versatile agricultural land?

No

Please set out the reasons for your answer:

These changes are too weak in recognising the need for food security as climate change and nature collapse progress. We should be protecting farmland and wild lands to secure our future. This food security policy needs to be stronger and to be set out by a Land Use Commission, making strategic assessments of the amount and type of food production that will be possible in different parts of the country. A Land Use Strategy is needed at national level. Important farming areas and wildlife refuges would inform the final strategic distribution. The Strategy would work down through councils to the allocation of land for food, wildlife, flood and fresh water management, and energy production (wind and solar).

39 What method and actions could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?

Answer, including any supporting information:

Full-life cycle carbon assessments must be mandated as part of every local plan..

Planning should insist that all newbuild is zero carbon (or carbon-positive locking carbon up in the form of wood and hemp incorporated into housing): zero-carbon in both construction and operation. Building Control should be administered only by state level inspectors.

Councils need sufficient funding to police building-safety, carbon-emissions and biodiversity net gains and losses.

We welcome changes to building regulations that are reducing the operational carbon emissions from homes. This requirement should swiftly be upgraded so that all homes are built at Passivhaus level (net zero). Importantly too each home releases an average of 100-250T of CO<sub>2</sub> in its build. In Oxfordshire this takes up nearly all of our carbon budget before we hit 1.5°C. New housing should be Passivhaus in operation (zero carbon emissions) and zero-carbon in its build. They should be carbon neutral through their whole life-cycle.

40 Do you have any views on how planning policy could support climate change adaptation further, including through the use of nature-based solutions which provide multi-functional benefits?

Answer:

1. Don't build in flood plains.
2. Don't rely on Biodiversity Net Gain - it is not clear that it will work.
3. Draw up clear plans of nature recovery networks and swathes of land for nature restoration, and don't build there.
4. Restore floodplains and 're-wiggle' rivers to protect our settlements and provide new habitat. This might sometimes involve de-growth of housing.
5. Plant trees and gardens in towns to provide shade.
6. Most importantly, land should be supplied for Nature First. It is fragile and complex with domino-effects happening from the losses of each species. We have no future outside of nature, and we are close to losing, for one thing, the insects. It is likely everything will collapse at that point.
7. Rivers should be protected and restored with no agricultural runoff of nutrients and no sewage outflows.

Biodiversity Net Gain in the Environment Act is welcome but is not sufficient for a flourishing ecosystem. Far more important is to establish Nature Recovery Networks and Strategies, with all newbuild being created for true need only, giving a wide berth to sensitive ecological areas.

## Chapter 8

41 Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?

Yes

Please set out the reasons for your answer, including any views on specific wording changes to the existing paragraph:

This must be managed at the National level. All roofs should be optimised for solar electricity generation. And currently existing roofs should all be used for solar. We should not be building solar farms on virgin land without a clear national Land Use Strategy. A Land Use Strategy would look at the total energy supply forthcoming from offshore wind, hydroelectricity, tidal power, wave power, and interconnectors with other countries, and then look at how much solar and onshore wind we need to make up the balance. At that point a national strategy should distribute requirements for solar towards the south and wind towards the north and west. Important farming areas and wildlife refuges would inform the final strategic distribution. Local Development Plans should then allocate land for solar and wind in just the same way as it does for housing. Similarly, the Land Use Strategy would

work down through councils to the allocation of land for food, wildlife, and flood and fresh water management.

42 Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?

Yes

Please set out the reasons for your answer, including any views on specific wording changes to the existing paragraph: 43 Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? No

Please set out the reasons for your answer, including any views on specific wording changes to existing footnote 54:

This is a charter for NIMBY objections to the national need for onshore wind turbines to be installed in windy places, often areas of natural beauty. Onshore wind must be backed by national infrastructure proposals rather than being vulnerable to the NIMBY lobby. The best use of land for wind production must be determined by a national Land Use Strategy. This should focus wind production in the north and west, and solar production in the south but should not preclude the installing wind turbines in suitable sites throughout the countryside.

Do you have any views on specific wording for new footnote 62?:

Footnote 62 should be deleted. Onshore wind should be through a National Infrastructure project as part of the National Energy Supply Strategy.

44 Do you agree with our proposed new Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?

Yes

Please set out the reasons for your answer, including any views on specific wording changes to the proposed new paragraph:

Retrofit is key. This paragraph should mention deep retrofit, as prescribed by the International Energy Agency. It will require airtightness, mechanical ventilation heat recovery, and insulation in addition to heat pumps and solar panels. We need a more permissive and informative lead for those unfortunates living in listed homes.

Chapter 9

45 Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system?

Indifferent

Please set out the reasons for your answer:

If no, what alternative timeline would you propose?:

46 Do you agree with the proposed transitional arrangements for plans under the future system? Indifferent

Please set out the reasons for your answer:

If no, what alternative arrangements would you propose?:

47 Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? Indifferent

Please set out the reasons for your answer:

If no, what alternative timeline would you propose?:

48 Do you agree with the proposed transitional arrangements for supplementary planning documents? Indifferent

Please set out the reasons for your answer:

If no, what alternative arrangements would you propose?:

## Chapter 10

49 Do you agree with the suggested scope and principles for guiding National Development Management Policies?

No

Please set out the reason for your answer:

TNDMP's will centralise planning when local people should be given greater powers over their own homelands. Too much power is vested in the Secretary of State.

50 What other principles, if any, do you believe should inform the scope of National Development Management Policies?

Answer:

51 Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?

Indifferent

Please set out the reason for your answer:

52 Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?

Answer:

## Chapter 11

53 What, if any, planning policies do you think could be included in a new Framework to help achieve the twelve levelling up missions in the Levelling Up White Paper?

Answer:

Policies should focus 100% on reversing the dual crises of the collapse of natural ecosystems and climate change, along with adaptation to the locked-in consequences of both. With a clear-sighted focus on the Wellbeing of Future Generations, nature and climate would be protected, and disadvantaged communities would find their feet.

54 How do you think the Framework could better support development that will drive economic growth and productivity in every part of the country, in support of the Levelling Up agenda?

Answer:

It is time we scrapped the drive for growth. It is prosperity and the wellbeing of future generations that should be our aim. Sometimes that will lead to de-growth. We should be

functioning within Doughnut Economics, ensuring that we keep within our planetary boundaries (we are not) whilst bringing about fairness in society (we do not).

55 Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?

Yes

Please set out the reason for your answer:

It is important that we protect the nature and food provision that the countryside offers. 'Duty to Cooperate' has been a burden destroying Green Belt and food and wildlife areas to meet housing targets relevant only to the city that is producing them, targets that are often there to drive economic growth rather than the wellbeing of future generations.

56 Do you think that the government should bring forward proposals to update the Framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups feel safe in our public spaces, including for example policies on lighting/street lighting?

Indifferent

Please set out the reason for your answer:

## Chapter 13

57 Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?

Answer:

It is very important to monitor the state of wellbeing of the local population and the impact of the plan on the environment. This is complex.

The use of Doughnut economics would provide a common system to monitor and present the impact of the plan on social wellbeing and on the environment.

See <https://www.kateraworth.com/doughnut/>

Doughnut economics is an economic model developed by economist Kate Raworth that aims to balance economic growth with social and environmental sustainability. The model is based on the idea of creating an economy that operates within a "safe and just space" for humanity, rather than one that is based on maximizing GDP or profit.

According to the doughnut model, the economy should aim to meet the basic needs of all people, such as food, water, shelter, and healthcare, while also protecting the planet and its natural systems. To achieve this balance, the model emphasizes the importance of reducing inequality, promoting environmental sustainability, and encouraging cooperation and collaboration.

This approach keeps track of twelve Social Foundations and nine Ecological Ceilings. A data profile of the locality is presented.

58 We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.

Answer: