

**Minutes of a meeting of the CPRE County Branches Forum
held in Birmingham on 5th June 2019**

1 Those attending:

Michael Monk (East of England/Vice Chairman)	John Wotton (Kent)
John Hudson (Berkshire)	Debra McConnell (Lancashire)
Stan Jones (Buckinghamshire)	Ian Lings (Lincolnshire)
Neil Salisbury (Buckinghamshire)	Danny Garvey (London)
Andrew Needham (Cheshire)	Christopher Dady (Norfolk)
Lillian Burns (CPRE national life member)	Peter Collins (Oxfordshire)
Tom Fyans (CPRE)	Malcolm Touchin (Rutland)
Robin Thompson (CPRE)	Andrew Fane (Suffolk)
Peter Finch (Devon)	Tim Murphy (Surrey)
Richard Nicholls (Dorset)	Sir Andrew Watson (Warwickshire)
Dee Haas (Hampshire)	Mark Sullivan (West Midlands)
Richard Bullen (Hertfordshire)	Anne Henshaw (Wiltshire)
Hilary Newport (Kent/Minutes)	Peter King (Worcestershire)

2 Apologies were received from Chairman Richard Knox-Johnston, and from Avonside, Essex, West Yorkshire, North East, East Midlands and South West.

3 Minutes and Agenda

The Agenda was accepted with minor adjustments reflected in the minutes below. The minutes of the previous meeting were accepted as an adequate record.

4 Regional Planning

The paper circulated in advance by Christopher Dady is appended as Annex 1.

The loss of regional spatial strategies is leading to fragmented and often competitive bids for infrastructure and other development (including new ‘garden’ towns) from LEPs and other planning authorities. CPRE’s structure lends itself to cross-border working to facilitate better coordination in communication and interaction with such organisations. Discussion was invited on whether, and how, this could be taken forward.

The UK 2070 Commission has recently published recommendations for a return towards a national spatial strategy ¹ and CPRE (via Paul Miner, Head of Strategic Plans and Devolution) will be engaging with the initial consultation stages of these recommendations. While not all of the recommendations are fully supported by national CPRE (for example, the proposals for four large regions focusing on London and the South East, the Northern Powerhouse, the Midlands Engine

¹ <http://uk2070.org.uk/2019/05/30/first-report-of-the-uk2070-commission-to-be-published-on-thursday-30th-may-2019/>

and South West), there are certainly principles within the UK2070 proposals that have merit and there will be further opportunities for consultation.

Discussion points raised following Chris's presentation included the following:

- It was agreed that greater cross-boundary co-ordination would be useful to further CPRE's ability to engage with, and react to, major strategic planning matters. Recognition of this was a major driver behind the creation of the new Paul Miner's new role as (job title).
- The UK 2070 Commission consultations will be a useful way to take this forward in the first instance, and co-ordination at the level of the CBF/national CPRE/'One CPRE' will be useful to facilitate this.
- A further useful step would be the collation of information across the network about what is already known about major strategic cross-boundary planning challenges. It was further recognised that in those areas where CPRE's presence as either branches or regions is weaker, additional support will be necessary.

5 Climate Change

CPRE is in the process of re-addressing its policies in the light of the now urgent cross-cutting imperative of mitigation of and adaptation to climate change. Consultation with the wider CPRE network has indicated that there is considerable appetite for a stronger policy engagement with this issue.

An audit of existing CPRE policies is therefore underway, with an invitation launched to the network for volunteers to contribute to this work through four separate workstreams undertaken by task groups working under the coordination of the national CPRE Policy Committee.

Discussion points raised included the following:

- The policy 'refresh' was welcomed as an opportunity to react to the increasing number of Nationally Significant Infrastructure Projects, particularly those dealing with energy transmission and generation.
- The task groups have now been appointed, but any information about potential volunteers who might be able to fill existing skills gaps should be made known to national CPRE via Tom Fyans.
- Climate change presents a policy opportunity for CPRE; the countryside is under threat from climate change, but also has a major role in mitigating against its worst effects. Safeguarding countryside has never been more important, and the forum welcomed the opportunity to clarify CPRE's messaging around that fact.
- CPRE Norfolk will be participating in the Extinction Rebellion Call to Arms on September 20th. Ecological change is already apparent and public engagement with environmental protection has never been higher.
- Campaigning for carbon-neutral new build ought to feature in CPRE policy (although it was noted that many LPAs no longer have their own inspectors to certify new-build compliance with existing building regulations). Gas boilers will be banned in all domestic new build by

2050 but this presents a lengthy delay. A major retrofitting programme will be required in any case and the target date should be brought forward.

- Branches would welcome support in the form of standardised social media ‘soundbites’ and infographics to raise public awareness of CPRE’s position on climate change
- Forum members were reminded of the recent letter from Tom Fyans published in The Guardian²

6 Viability of the Branch network

Debra McConnell’s paper to the Forum is appended at Annex 2 to these minutes. Discussion focused around the acknowledgment of the following:

- Donor numbers are down, while income has reached a plateau. Legatees are living longer and requiring more care in later life, so legacy income is declining.
- CPRE’s ‘pitch’ to donors is more complex than those of charities such as animal welfare and wildlife trusts

Questions focused on whether there should be a re-think of the way in which membership and other income is distributed between national CPRE, regions and branches, whether CPRE’s county branch structure remains relevant in the light of changing administrative structures, and the ways in which support could be focused on weaker branches and regions to strengthen their capacity and their ability to fundraise. The CBF could have an important role to play in helping make decisions about how funding from the CPRE Strategic Collaboration Fund is allocated to branches most in need of support. It was widely agreed that while decisions about how to ‘cut the cake’ are important, it is also important to ensure that ‘the cake’ becomes large enough to support the work of the entire CPRE network.

7 Ways of Working

The ‘Ways of Working’ programme evolved from the original work on a partnership agreement which originated within the County Branches Forum. The Memorandum of Understanding which emerged from the partnership agreement group was signed up to by all but 8 county branches, before changes within national CPRE and elsewhere stalled the work temporarily.

The partnership agreement working group recently expanded and changed its name to the ‘Ways of Working’ group, to better emphasise its core intentions. It now has seven working groups:

- How we will agree policy
- How we will implement campaigns
- How the network is supported
- How the local charities contribute
- How we will resolve problems
- How we will recruit and retain members

² <https://www.theguardian.com/environment/2019/may/07/can-we-humans-save-ourselves-from-self-destruction>

- How we will raise money

The board has already agreed to a review of the process of policy making in support of the first working group. At present policy making is usually undertaken at the request of the Policy Committee by a task group drawn from members and staff, usually led by a member of the Policy Committee (and increasingly, task groups to research issues that may lead to new or changed policy are generated from within the County Branch Forum).

Campaigning on HS2 was raised as an example of the need to quickly generate and co-ordinate CPRE policy which would be of benefit to the whole CPRE network. The review work on climate change policy is a practical example of this approach being applied to an unusually complex and cross-cutting issue.

The next steps will be to canvas opinion, beginning at the conference/AGM in June, and then to launch a network-wide consultation informed by the initial feedback received. At present the questions that will be asked in these consultation steps are still being finalised, and Forum members are invited to give input and make suggestions.

Forum members agreed that they would welcome as much advance notice as possible of national CPRE press releases and campaign activity, and guidance on what national CPRE expects of branches in rolling out those campaign messages at local level. Branches will remain at liberty to decide how to prioritise these actions in the light of local circumstances.

A new step is the implementation of a Positive Planning Advisory Group which will report to the Board via the Policy Committee. It will be charged with subjects such as Green Belt release and planning policy for new 'garden' towns, and where necessary will propose new areas of work that could be undertaken by future task and finish groups. The new structure being implemented within national CPRE will allow flexible campaign capacity, responsive to changing campaign needs, to be provided. The CBF will have a crucial role to play in this process.

8 Strategy review

Version 8 of the new Strategic Plan document was circulated with the papers for this meeting in order to seek feedback. The latest version of the plan has changed in response to earlier feedback, and now includes a dedicated section on climate change as a cross cutting priority, emphasises that planning is a key strategic priority, and clarifies CPRE's definition of 'countryside' and 'rural' as key to campaigns which support a thriving rural economy. CPRE must not ignore the fact that its membership and its income is in decline and that it must take steps to survive as an organisation into a future where it will be more needed than ever. The new Strategy is focused on ways to achieve that.

Points raised in discussion included the following:

- Some members raised concerns over the costs of the re-branding process, and the on-going costs of replacing branded materials and stationery. Others acknowledged that effective research and creation of a new brand is inevitably an expensive process, and did not consider the cost excessive: the costs were increased by the Board's keenness to ensure extensive consultation across the whole network. Urgent action is needed to reverse the decline in membership and income, and such action will inevitably carry a cost. Branches will be supported, where necessary, to replace branded items.

- Should there be more focus on wider transport campaigning and road building? The strategy currently focuses principally on sustainable rural transport.
- Do we risk 'losing' an urban audience by focusing on countryside/rural at the expense of urban green spaces? It was suggested that the focus on rural/countryside provides the clarity in our messaging about our objectives, and few people are prepared to support a charity that lacks such clear objectives.
- Despite a government commitment to 'sustainability', it is widely recognised that local plans emerging across the country are anything but sustainable in the impacts of the levels of development they allocate to greenfield land. Genuinely sustainable development, which fully recognised its climate change implications, would result in less environmental impact than is currently embedded in government policy and in local plans.
- Consideration could be given to the adoption of a specific strategic objective: the production by CPRE of its own ideal NPPF to inform campaigning.
- Additional correspondence from branches on the subject of the Strategic review is appended in Annex 3 to these minutes.

9 Any other business:

Housing Targets

Peter Finch of CPRE Devon reported on the research on housing need vs housing targets they commissioned, and reported widely upon, last year. While ONS projections make it clear that fewer homes are needed than are calculated using the current OAN methodology, Government policy remains firm that LPAs will be penalised if they do not adhere to the higher targets. CPRE Devon are seeking support in principle from the CBF and from national CPRE to commission a project to widen that work to the whole of England; the work could be undertaken on a *pro bono* basis and would provide the benefit of giving CPRE a firm evidence base to underpin its lobbying for lower housing targets. (details appended as annex 4 to these minutes)

Forum members welcomed the recent fundraising mailout as explicitly recognising that the housing targets developed in the ONS methodology are unsustainably high. The work of the TFG on housing numbers, which recently informed the CPRE response to the MHCLG's consultation on changes to the NPPF and calculation of ONS, was discussed in the light of what direction it could take next. Members discussed how aggressively CPRE might choose to campaign against the Government house building target which remains at 300,000 per annum despite the recent reduction in ONS household projections.

This issue is compounded by the flaws in the current planning system in which the development plan update process begins with a call for sites from willing landowners, rather than a rational assessment of where necessary development might be sited sustainably. It is further compounded by the failure of the current system to provide genuinely affordable housing, or to incentivise local authorities to provide social housing when Right to Buy remains enshrined in the housing policies of leading political parties. Members' attention was drawn to a recent article by George Monbiot³

³ <https://www.theguardian.com/commentisfree/2019/jun/04/tackle-inequality-land-ownership-laws>

launching a Labour Party policy paper⁴ on land value capture, which is also highly relevant to this important discussion.

It was suggested that discussion on these wider topics could be furthered by organising one or more seminars for interested members.

New Land Use Statistics have been published⁵

⁴ http://labour.org.uk/wp-content/uploads/2019/06/12081_19-Land-for-the-Many.pdf

⁵

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/805435/Land_Use_Change_Statistics_England_2017-18.pdf

Regional Planning in England

Over many years we have seen a mixed emphasis on strategic regional planning by successive governments. In the 1930's employment based measures were introduced, and a framework for spatial planning was established in the Town and Country Planning Act of 1947. Regional measures were taken in the 1960's leading for instance to decentralisation across the UK of many government departments. Regional Development Agencies were established in 1999 but ten years later these were abolished and Local Enterprise Partnerships (LEPs) were established.

As well as LEPs government policy has also sought to devolve more power to local authorities with the promise of additional funding to those whose 'played ball', but the outcome to this approach has been very piecemeal. What has transpired is a move away from a strategic regional planning to a competitive bidding framework under various banners - regional growth funds, enterprise zones, together with city and growth deals.

This is a politically driven funding system, skewed by the connections and persuasive powers of each local LEP and the politicians involved.

The question is whether a move away from a regional approach to planning in the UK has been a benefit. What is certain is the blanket approach to housing targets with accompanying loopholes created by policies has created great damage in many areas without addressing the issues. It is also clear that opportunities such as reuse of redundant military bases has not been taken in a beneficial way, there remains a funding deficit to the North and infrastructure funding has been very poorly managed by successive ministers.

CPRE & Regional Planning - a proposal

There is an opportunity for CPRE to with its regional network to create a strategic vision for England.

Such a vision would highlight the strengths of each region, and the opportunities available. It would indicate where resources should be applied and activities concentrated. It would look at housing, business, tourism, agricultural, environmental and infrastructure needs and opportunities.

This would be a document that would help unify CPRE via a single project, give CPRE nationally a platform from which to argue its case, strengthen the regional network and assist branches within their own work. It would pull in work already undertaken within CPRE.

The proposal is that a project engaging with all branches led by the regional group supported by the National Charity is undertaken to create a strategic Vision for England.

Chris Dady
CPRE (Norfolk)
5th October, 2018

THE VIABILITY OF THE BRANCH NETWORK

Giving to charity and support for the sector has grown year on year. By 2012 there were 34 million donors who gave regularly. However by 2017 donors had fallen to 31 million. That number has remained fairly constant but charitable income from donations has not fallen. There are fewer donors but they give more.

Charities other than CPRE have succeeded in driving forward significant increases in membership and revenue. The RSPB and WWF appeal to all sectors of Society: humans like birds, animals and wildlife. They are everywhere, including in urban areas. The “countryside” is less tangible and more generic; arguably it is more about aesthetics. For some it is seen as more exclusive and “for other people”.

Since its foundation 90 years ago CPRE’s principle income is legacies. This is unsustainable:

- the population is living longer;
- young people need more financial support than ever before - the bank and time of Mum and Dad supports expensive university education, child care and housing costs;
- as people live longer more people need expensive rest home and nursing home care than in the past and
- save where a charity membership is very high, legacy income can be unpredictable and sporadic.

In some years CPRE Lancashire received no legacy income at all (2005 and 2009). In other years it was very small (£1100 in 2006). In 2007 it received £60,000. That has never been bettered before or since.

As a network of charities there is also a significant difference in income and disposable income across counties and regions:

- CPRE Lancs (covering Lancashire, Greater Manchester and Merseyside) has just 749 members yet in terms of population we are one of the biggest branches;
- the north – south financial divide remains significant. Mean income and housing values are much lower in the north; there is less in the pot to give and
- through no fault of its own Greater Manchester and Merseyside has some of the most economically and socially deprived areas in England. The disappearance of mining and manufacturing, the general decline in blue collar employment, a very strong community spirit which can tie people to their place of birth and deter relocation, a stronger than ever culture of home ownership with falling rental stock and council housing and a lack of investment and resourcing from central government has taken its toll. Other areas have similar economic problems. Cornwall struggles to provide affordable homes for its own people, particularly the young and is heavily dependent on tourism. Some areas of the Midlands and Greater London have pockets of severe deprivation. It is no coincidence that the average life expectancy of a northerner is lower than that of a southerner.

In contrast, the south east for example has seen exponential growth, significant investment and resourcing and relatively high levels of employment. The so-called Home

Counties and wealthy counties such as Devon and Hampshire are blessed with greater wealth and prosperity. Some towns on the south and eastern coasts have very high proportions of retired residents (a significant number of whom are well off) attracted there by large numbers of other older residents and warmer weather! Charities in such areas are pushing at an open door to secure income, legacies and donations. House values are extremely high in such areas.

More well off branches also have the resources to increase their wealth. Money breeds money. Such branches can fund expertise to secure grants and money making opportunities.

How have poorer branches stayed afloat? How have they helped themselves? CPRE Lancs has cut costs. For example it has ended the tenancy of its rented office - our administrator works from home. It is run entirely by volunteers except for our professional planning manager and a part-time administrator.

How have we tried to increase our income?:

- increasing our profile: very active networking including social media with local interest groups, parish councils, city politicians, university departments, schools, journalists and the media;
- appearing and speaking at rallies and events;
- stands at country shows;
- in 2017 we employed a highly regarded consultant with expertise in grant funding to apply for grants and funding (he was not successful);
- events such a farm visit, walks, visit to a wildlife trust venue and
- we run a lottery.

How can the long term viability of the branch network be improved?:

1. a portion of membership income is retained by National Office (NO) to finance its operations. The network (or poorer branches only) would receive all its membership income or a bigger proportion of it. How would poorer branches be identified? How would this be justified to the network as a whole? It could be divisive. Would NO be able to afford this? I am told that NO is dependent on network membership income and could not function effectively or at all without it;
2. Cross-subsidy of the network; richer branches would support poorer ones. For example, more prosperous branches could tie- in with less prosperous ones through a “buddy” or similar scheme. This could be marketed by richer branches to their advantage, would encourage a spirit of “one England” and would be informative and educational to members of prosperous branches. Some members and some Boards of richer branches would object;
3. NO have marketing expertise that could be mandated as a priority to increase funding for the network (many branches do not have such specialists). For example NO could run a big campaign on radio, in newspapers and in other media, targeting donations exclusively for branches with viability issues. It could pay for full page adverts in local magazines for the targeted areas eg “Lancashire Life”;

4. Some of the richer branches receive (relative to the network as a whole) a disproportionate amount of grants and funding opportunities from NO because they employ expertise to secure it (to make money you need to spend money). NO could bar funding to such branches and earmark it for struggling branches and
5. NO could encourage the network as a whole to share expertise. Richer branches who employ specialists and expertise in grant making and marketing could be encouraged to share such skills with less well-off branches (and see point 2 above). This could be facilitated through a mentoring scheme

The people of England need and want the countryside and green spaces for a reasonable quality of life, food production, biodiversity and for mental health and well-being. It should not be the prerogative of the well-heeled or more prosperous. Central and local government is aware of the disparity between sectors of society in terms of income, quality of life and life experiences. CPRE urgently needs to address this issue if the Charity is to thrive and be relevant to all the people of England. “One CPRE” truly is and must be our mandate for the 21st century.

From CPRE Kent:

CPRE Kent appreciates the work that has been done to develop the draft strategy, taking account of comments from the network and elsewhere. We support the overwhelming majority of its content and note that the draft strategy recognises that County Branches may adopt their own strategy, based on local circumstances. There are, however, three points of substance we wish to make on the draft document. Two are points of omission (or insufficient emphasis) and the third an important matter of interpretation.

1. A key aspect of Aim 2 should be to promote a healthy environment in the countryside. An increasing threat in rural areas (just as in urban areas) is poor air quality. This particularly affects rural areas beside busy roads, where emissions from traffic cause an unacceptably high level of pollutants, affecting the health of all road users, pedestrians, local residents and workers. The problem is exacerbated by poor transport infrastructure and unsustainable development leading to increased traffic on rural roads (including main roads passing through rural areas). We suggest that addressing this issue should be an express part of Aim 2.
2. We feel that insufficient weight is given in the document, both in those sections which emphasise the value to society of the countryside and the section on climate change, to the importance of the countryside in sustaining biodiversity and the threats to biodiversity which development in the countryside and climate change impose.
3. Aim 2 includes the wish to see more people living and working in the countryside (which means not only the countryside in its natural meaning, but also villages and towns with up to 10,000 permanent residents). The strategy does not (as we believe it should) contain a clear strategic aim to minimise the impact on the countryside of the development necessary to provide homes meeting local needs (“the right homes in the right places”), with associated infrastructure and employment, particularly in terms of building on greenfield sites, both in protected and unprotected landscapes. The reference to “brownfield first” is insufficient to imply such an aim. In the absence of such an aim, wanting more people living and working in the countryside could be taken to imply support for the growth of existing rural settlements and new “garden” villages and towns in the countryside, driven by the broken planning system that imposes absurd and unachievable housing targets on local planning authorities. This is what we in Kent, and no doubt many other branches, are chiefly fighting against. The Kent countryside is not underpopulated, nor is unemployment *per se* a problem. We support sustainable rural communities, the provision of adequate affordable housing to meet local needs, measures to support small-scale rural businesses and sustainable agriculture, measures to discourage commuting to work and school runs by car, and measures to help local centres provide the services local people need (in a challenging economic environment, especially for local retailers). What we do not support is seeking to increase the number of people living and working in Kent, irrespective of their impact on the countryside and the environment.

John Wotton, Chair
CPRE Kent

CPRE
County Branch Forum
5 June 2019
Contribution from the Chairman of the Northamptonshire Branch

Following the submission from the Oxfordshire Branch Executive regarding the Purpose Project, branding, strategy and procedure, a number of branches, including Northamptonshire, wrote in support and reflecting their own concerns. These were considered by the Board Meeting on 21 March. The subsequent responses, whilst acknowledging the concerns of the respective branches, indicated that the Purpose Project and consequent branding exercise would be proceeding as planned. Whilst we are naturally disappointed at this, and still do not agree with the Board's conclusion, we accept the decision of the Board, and wish to find a way to work co-operatively with National Office regarding the development and implementation of the results of the comprehensive CPRE review in the best interests of CPRE, to which we are committed. However, we consider that this matter has identified a number of considerations which continue to occasion concern and which we feel it is our responsibility, as a branch, to identify and place on record so that there is shared understanding.

- That branches and local membership will be fully engaged in the ongoing process of development and implementation.
- The longer-term relationship between the branches and National Office is recognised as an integral part of the Purpose Project.
- The criticism and concern that this exercise has aroused amongst members cannot be forgotten or dismissed, or else we fear that we shall lose members from resignation. This may not be an immediate issue, but we would be concerned at continued attrition through demotivation, added to our already declining membership.
- For those branches, such as Northamptonshire, with no independent sources of income, this would have direct consequences in terms of income and viability.
- Whilst we fully appreciate that the Purpose Project is, in part, about reviving and reinvigorating the membership, our fear, as previously expressed, is that, as well as being misguided in some respects, if we are not careful, we could turn off the current base too quickly, and then have no base to add to.
- As a branch, we acknowledge and appreciate the importance of the professional work undertaken by National Office, but it is vital that we are supported in conveying that understanding to all our members, who have normally engaged with CPRE out of concern for their local environment.
- There must be transparency about the utilisation of individual subscriptions, and a refreshed view of how members' subscriptions are used, so members can have that clearer understanding and engagement. Any such view must reflect the needs seen by branches as to what are the priorities in activities and spending.

- In all this, we are not seeking to criticise National Office in isolation; rather we believe we need to look at the whole of CPRE and the complex interrelationships before the continuing decline in membership and money forces decisions that would not necessarily be in our best interest.
- The volunteers in all our branches are a powerful collection of people, with a wealth of knowledge and experience, whose talents and potential contribution must be not only recognised, but fully utilised for the future success of CPRE. For they understand the issues and challenges facing rural England – its countryside, villages and towns, where a great number of our current supporters live.
- Yet we remain concerned that the comments and criticisms of long-serving members do not seem to have been addressed. There are a good number expressing dissatisfaction, and if those questions go unanswered or seem (rightly or wrongly) to be dismissed, then the divide between the branches and the centre will grow.
- Overall, we remain concerned that we are in danger of losing some of our most loyal and valuable volunteers and our long-established prestige and distinction in matters about which we are expert.

These points reflect our continuing concern as a branch about the divisions within CPRE, and identify our belief that these must be addressed as of vital importance alongside any rebranding exercise. The network that is CPRE must have proper regard for those who work and campaign locally to protect and enhance rural England. In order to be successful CPRE must not only be professional, but it must also have a clear purpose that commands the confidence of all.

As a branch we wish to see CPRE not only prosper, but have a long-term future. We may have our disagreements and differences of opinion regarding the Purpose Project, but beyond that we share a common purpose. That is why we felt it important to place on record these continuing concerns and considerations; not to re-open past debate, but rather to ensure that proper regard is given to these matters in the future process of development and implementation. As the proposed Memorandum of Understanding is discussed and prepared, we hope that these will points will be addressed; we trust that they will provide a positive and practical checklist of criteria against which the Memorandum can be tested.

Dr Martin Gaskell

From Peter Finch on 4th June

Hi Hilary and Caroline.

Thank you very much for the papers. It is clear that the CBF have been concerned about the standard methodology for assessing Housing Need and that Matt was unequivocal in challenging the Government in the Consultation response. However, there do seem to be mixed messages coming from NO. This week I received a letter from them asking for a donation. On page 2, in the section headed "Enough is enough" it states "Not enough homes are being built..." This is in contradiction of the concerns of our members who feel that too many homes are being built, they are not affordable and are being built in the wrong places.

I will be very happy to engage with the ongoing work of the TFG when we have received ORS's report on national housing figures.

Caroline - thanks for your account of the Broken Housing Conference. It showed the bias and vested interests which are influencing Government policy. I chair the Teignbridge District group of CPRE Devon and am Vice-Chair of the County branch. The recent election of Independents here who are challenging the level and type of housing around Newton Abbot has shown me that the public regard this issue as a high priority and will support people and groups which will campaign to engage them in real locally-developed planning policies.

I will look forward to working together.

Kind regards.

Pete Finch.

Memorandum to the CPRE's National County Branch Forum from CPRE Devon (31/5/19)

CPRE Devon believes it is important to deliver the right number and type of homes in the right places: we do not oppose housing development *per se*. However, the government's current housing target for England is excessive and CPRE Devon is concerned that our National Office seems to have accepted the government's position unquestioningly.

The current National Planning Policy Framework says that local authorities' planning policies should be based upon local housing needs assessments, but the government's new "standard method" for conducting assessments based on official household projections with an upward adjustment based on affordability ratios means that, in effect, councils' housing targets are now imposed by central government with little or no consideration of local factors. The change in methods would be less threatening if the evidence was properly used; but the government's target of 300,000 new homes per year for England is unjustified.

Because of our concerns, in 2018 CPRE Devon commissioned ORS (a specialist university spin-out social research practice) to compare the combined annual local plan targets of all the Devon local authorities with an evidence-based assessment of need: the combined target is for a total of almost 5,800 new dwellings each year across Devon, whereas the most recent household projections (ONS 2016) indicate a need for only 4,300 new dwellings per annum; and these numbers compare with the Local Housing Need figure, based on the government's standard method, of around 5,300 dwellings per year. CPRE Devon recognises that there is a need to build many new homes to address housing market

pressures, but the government figure includes up to 1,000 additional homes each year that cannot be justified, whilst the Devon councils are planning for 1,500 more than needed!

Despite what the evidence shows, local authorities and inspectors are unlikely to question the government-inspired figures. In this context, we believe the CPRE National Office should challenge the government's imposition of an arbitrary target while campaigning for the protection of rural England!

Meanwhile, to test the credibility of the 300,000 new homes target, CPRE Devon has asked ORS, on a *pro bono* basis, to do further initial analysis of the national housing needs figures in time for the next meeting of the National County Branch Forum. We are committed to evidence-based policy (rather than policy-based evidence!) and we believe the work will be valuable not only in challenging adverse targets and decisions locally, but also in equipping the CPRE National Office to question national policies effectively. The independent figures from the Office for National Statistics do not support the government target, and their latest analysis shows a marked reduction in the overall number which the government is failing to recognise. The government rightly says that the household figures should not be taken in isolation, but the gulf between the projected growth and the political aspiration for 300,000 new homes each year cannot be justified. It is important to review the evidence to ensure that the right number of homes is provided nationally and more locally.

There are no cost implications at this stage for the initial analysis work proposed since ORS will be working *pro bono*. But CPRE Devon seeks the support of the National County Branch Forum in taking these issues forward and in urging our National Office to question rather than uncritically accept national policies and targets. We plan to bring a more specific research paper to the Forum next time for your consideration.

From the Trustees of CPRE Devon