




Campaign to Protect
Rural England
Standing up for your countryside

Beauty betrayed

**How reckless housing development
threatens England's AONBs**



“It dismays me that governments are prepared to contemplate, let alone encourage, building extensively in our AONBs. Of course the countryside cannot be bottled in aspic; it has to be used to meet our evolving social and economic needs but this has to be done with great sensitivity. We need more homes and more businesses but not at the cost of destroying precious landscapes with rampant development. Once you bulldoze this unique heritage it cannot be restored; it is lost for ever. All strength to CPRE’s campaign”.

Jonathan Dimbleby

South Devon AONB patron and former CPRE President



Beauty betrayed: how reckless housing development threatens England's AONBs

England's 34 Areas of Outstanding Natural Beauty (AONBs) cover 15% of the country, conserving and enhancing our finest landscapes. These special places have become part of our landscape heritage and are an important source of enjoyment and inspiration for millions of people.

More than two-thirds of England's population live within 30 minutes of an AONB.¹ They are also highly valued by local businesses, attracting tourists and generating an important market for local farmers and growers.² Their careful management and protection means that while much countryside has suffered from unnecessarily damaging development, England's AONBs should remain oases of tranquillity, enhancing the health and well-being of both people and wildlife.

Their origins stem from the National Parks and Access to the Countryside Act 1949, presented as a gift to the nation for its war-time sacrifices in defending our green and pleasant land. The Act

allowed for the designation of areas worthy of National Park status for their beauty and recreational value, but considered insufficient in scale or wildness to require the same model of protection. AONBs' primary purpose is to conserve and enhance natural beauty, while taking account of the needs of rural industries and local communities.

Yet new research published by CPRE reveals an insidious threat to these treasured landscapes.³ AONBs are being subjected to a dramatic increase in major housing applications,⁴ with a corresponding leap in the number of units approved and the amount of land lost. Unlike the National Parks, which have their own planning authorities, AONBs rely on local authorities and planning inspectors for their protection. But the sheer weight of applications and appeals means that large and inappropriate housing developments are getting through as local authorities struggle under pressure from developers.

Planning and AONBs

The National Planning Policy Framework (NPPF) says that: *'Great weight should be given to conserving landscape and scenic beauty in AONBs, which have the highest status of protection in relation to landscape and scenic beauty.'* Government policy also allows housing targets to be lower in designated areas and recommends that 'major developments', including housing schemes, should be refused except in 'exceptional circumstances'. However, both of these terms are poorly defined, creating loopholes that are often exploited by developers.

But despite having the highest level of planning protection, AONBs have long been seen

as under significant pressure as Government policy forces local authorities to prioritise housing numbers over landscape protection. When a council cannot demonstrate a 'five-year land supply' for housing, or doesn't have a local plan in place, the NPPF's presumption in favour of 'sustainable development' encourages developers to submit speculative housing applications – even in AONBs, where the presumption does not apply.

The situation is made worse by a system for determining housing numbers that creates unnecessarily high targets – particularly in areas like the south of England where market forces increase demand.

¹ LUC, *The Value of AONB Partnerships*, 2013

² Cumulus Consultants, *Assessment of the Economic Value of the Cotswolds AONB*, 2013

³ Dixon, Sinden and Crabtree, *An Independent Review of Housing in England's Areas of Outstanding Natural Beauty 2012-17*, 2017

⁴ The research is based on applications for ten or more housing units, which is the regulatory definition of 'major development': The Town and Country Planning (Development Management Procedure) (England) Order 2010 <http://www.legislation.gov.uk/uksi/2010/2184/made>

What the research shows

The new research has been carried out by a group of independent consultants commissioned by CPRE, using data from planning consultants Glenigan on applications for developments of ten or more houses. The following key findings confirm that major housing developments pose a significant threat to the beauty and character of England's AONBs.

High Weald AONB



Development in AONBs



Key finding 1

Since 2012, 15,485 housing units have been approved within AONBs, with an increase of 82% between 2012-13 (2,396 units) and 2016-17 (4,369 units). The average number of units per application approved in 2015-2017 was 43, compared with 36 in the previous three years.

Key finding 2

Decisions are currently pending on a further 12,741 units in AONBs. Based on the 2016-17 approval rate (64%), this could mean another 8,154 units, which would result in a total of 23,639 new housing units being approved in AONBs since 2012-13.

Key finding 3

The amount of AONB land approved for housing each year has increased five-fold since 2012 – from 41.06 hectares (ha) in 2012-2013 to 211.93ha in 2016-2017, based on 190 applications (totalling 7,807 units) where site area was known.⁵

Key finding 4

The total number of units approved on greenfield sites within AONBs in the past five years is 6,580 (42%) with a further 8,301 approved on brownfield land (54%). 604 units (4%) were also approved on a single mixed site.

⁵ Equivalent to around 50% of the total number of schemes and units in the study. See box below.

CPRE analysis

The lost landscapes

Based on the data underpinning Finding 3 (above), 435ha of AONB land have been approved for housing in the past five years. However, this is likely to be a major underestimate of the total loss, as our researchers did not have access to site area information for another 200 schemes totalling 7,678 units. By using

the housing densities of the schemes where site areas were known we can extrapolate the overall land area approved for housing in the past five years. This calculation suggests that 792ha of AONB land has been approved for development since 2012.

Land take and density

Based on the data from Finding 4, we used the extrapolation explained above to give a credible but conservative* estimate of the total amount of land taken by brownfield and greenfield development. This suggests that around two thirds (533ha) of land approved for housing in AONBs was previously developed 'brownfield'.

However, while CPRE normally encourages the use of brownfield sites for housing, our calculations showed that these schemes had been planned at a density of just 16 dwellings per hectare (dph). When brownfield sites are built out at a national average of around 37 dph, this constitutes an incredibly inefficient use of land – particularly in nationally important landscapes.

We believe this – together with the lack of infrastructure and services – shows why AONBs are generally not suitable for large-scale housing developments. The difficulty of

planning major schemes without harming scenic beauty means that even brownfield sites (outside existing settlements) cannot achieve the building densities that would make the most efficient use of our scarce land resources.

Leaving aside the debates over the suitability of these brownfield sites, our calculations show that 259ha of greenfield land has been approved for housing since 2012.



*Conservative because schemes below 10 dwellings are not included in this study

15,485

Housing units that have been approved within AONBs since 2012

x5

The increase in the amount of AONB land approved for housing since 2012

792 hectares

AONB land that CPRE estimates has been approved for development since 2012

Developer pressure on AONBs



Key finding 5

In the past five years, applications for major housing schemes within AONBs have doubled (up 105%), from 80 applications in 2012-13 to 164 in 2016-17. The amount of units proposed increased by 162%, from 2,530 in 2012-2013 to 6,633 in 2016-2017.

Key finding 6

Large-scale housing development is not uniformly distributed across the 34 English AONBs. Housing pressure within AONB areas – defined by the number of applications, approvals and housing units – is most intense in the South East and South West. Here, just eight AONB areas⁶ accounted for 74% of all housing applications and 79% of all approved housing units from 2012-2017.

These areas have seen a significant increase in the average number of units built each year – in the High Weald AONB, an average of 311 units a year were approved during 2012-2015, almost trebling to 895 between 2015-2017. This is only likely to be exacerbated if Government proposals prioritising housing in areas of high demand are implemented.

Key finding 7

The Cotswolds and High Weald AONBs have the highest number of appeals, accounting for 42% of all cases between them, and putting huge pressure on local authority and AONB resources. The cost of defending an appeal on a major housing scheme can run into tens, or even hundreds, of thousands of pounds.

Key finding 8

The number of appeals against decisions to reject major housing developments in AONBs has trebled, often fuelled by developers who pursue permission despite their initial application being refused. Government Planning Inspectors have refused a significant proportion of these – with the trend growing as the NPPF has bedded in – which suggests that many local authorities could be taking a stronger line on resisting housing developments in AONBs. In the past five years, the success rate for appeals has gone down from 71% in 2012-2013 to 24% in 2016-2017 – but a total of 1,882 housing units have been approved at appeal.

Development in the setting of AONBs



AONBs are also impacted by development immediately outside their boundary in the area known as the 'setting'.⁷ Housing development in these areas can have a significant impact on the character of the AONB.

Key finding 9

Since 2012, 11,879 housing units have been approved near to AONBs, increasing by 161% from 1,327 in 2012-13 to 3,459 in 2016-17.

Key finding 10

In the past five years, annual applications for major housing development on land adjacent to AONBs have more than doubled, from 45 applications in 2012-13 to 105 in 2016-17.

Key finding 11

The area of land approved for housing in the setting of AONBs increased nine-fold between 2012-13 and 2016-17, from 12 to 110ha (based on 114 schemes totalling 4,390 units where the site area was known).⁸ 60% of this was greenfield land.

CPRE analysis

The lost setting

Based on the data underpinning Finding 11, we know that 212ha of land in the setting of AONBs has been approved for housing in the past five years. However, by using the extrapolation explained in 'The lost landscapes' analysis on page 3, we estimate that the total figure could be at least 566ha – of which 322ha is likely to be greenfield.

The full impact on AONBs and their setting

In total, the past five years has seen housing approved within and around our Areas of Outstanding Natural Beauty that would cover 1,358ha of land at an average density of less than 20dph. This constitutes an appallingly careless use of an area of land almost the size of our smallest AONB, the Isles of Scilly, in its entirety (1,600ha).

⁶ The eight AONBs under the greatest pressure are Cotswolds, High Weald, Cornwall, North Wessex Downs, Dorset, Chilterns, Kent Downs and South Devon

⁷ Land up to 500 metres from the edge of an AONB is known in planning terms as the 'setting'. For developments of over 500 units, the setting extends to 2 kilometres from the boundary.

⁸ Around 46% of the total number of schemes and 37% of the total number of units used to produce Findings 9 to 11.



South Devon AONB



Chilterns AONB



Cotswolds AONB

Cranborne Chase AONB



Conclusion:

Why is this happening?

The research findings are clear. AONBs are under growing pressure from large housing developments and the scale of this, both in applications and approvals, has increased significantly in the past five years.

This is due to a combination of unrealistic Government housing targets, conflicting national planning policy, speculative building applications and the pressure on local authorities to deliver houses at any cost.

The majority of AONB teams and local branches of the CPRE that responded to a survey for this research reported AONBs that were only partially covered by up-to-date local plans, with many councils failing to meet five-year land supply (see 'Planning and AONBs' analysis on page 1). This makes them especially vulnerable to speculative development, as discussed above. The evidence suggests that

developers are getting bolder too, with a huge increase in overall applications, in the number of housing units proposed and in the land take. And all this is happening within and near to AONBs, which have the highest level of planning protection.

These wonderful places are vital resources for people and nature, and we must expect that any housing development meets the highest environmental standards, delivering affordable homes to meet the needs of local communities and complementing the landscape.

This can be achieved. Solutions can come from improved Government policy and from people power – using

neighbourhood plans to decide where development is best suited and through community-led housing schemes (see South Devon AONB case study). Action is needed now to ensure that the drive for housing does not continue unchecked and with no consideration for the future of England's AONBs. As arguably our most successful house builder Harold Macmillan said in 1952, in designated landscapes *"amenity considerations have the prior authority ... we ought to try to preserve what is one of our greatest assets – the beauty of the countryside."*



Recommendations

Based on this research we are making the following recommendations to Government and Local Authorities:

“We will build better houses, to match the quality of those we have inherited from previous generations ... maintaining the existing strong protections on designated land like the Green Belt, National Parks and Areas of Outstanding Natural Beauty”.
Conservative Party 2017 General Election manifesto

National policy

The Government must:

- Include targets in the promised 25-year Environment Plan to enhance AONBs and ensure that development does not damage landscape quality. This should emphasise the importance of AONBs to the health, wellbeing and prosperity of the nation and set out how they will be better protected.
- Give AONBs a statutory right to be consulted on major development proposals in their area, so that their advice is fully considered by the local authority when determining a planning application. This could be achieved by making additional resources available to AONBs so that they can be even stronger champions for these outstanding landscapes.
- Reform the Government’s New Homes Bonus scheme for local authorities so that it no longer encourages large-scale housebuilding in AONBs.
- Publish annual statistics on the rate of development and other change of land use in AONBs, as is already done for Green Belts.



Planning policy

The Government must:

- Amend the NPPF to state a presumption against proposals for large housing developments in AONBs. It should be made clear, as it is for Green Belt, that demand for housing or the lack of a five-year supply is unlikely to justify large housing developments in AONBs.
- Incorporate the statutory ‘duty of regard’ into the NPPF, making it the overriding factor in decision-making. This requires all relevant authorities with land in an AONB ‘in exercising or performing any functions in relation to, or so as to affect, land’ in these areas to ‘have regard’ to the purpose of the AONB.
- Amend NPPF housing policies to state that new housing in AONBs should generally be affordable and in relation to local needs.

Planning guidance

The Government must:

- Issue more guidance on how the major development test should be applied in AONBs by providing good practice examples, helping define terms such as ‘great weight’, ‘exceptional circumstances’, ‘public interest’ and ‘national considerations’ and incorporating this into the Natural Environment section of the national Planning Practice Guidance (PPG).

Local policy

Local authorities should:

- Develop strong, specific policies in local plans that recognise the importance of their AONBs and uphold them in development management decisions.
- Make sure all AONB management plans are treated as material considerations and ensure they are appropriately referenced in local plans.
- Uphold the legal ‘duty to co-operate’ by coordinating the management of shared AONBs and developing a common strategic policy for housing within AONBs.
- Promote and support community-led housing processes as a means of delivering local needs housing in AONB areas. This could be done through reforming the New Homes Bonus scheme. (See Recommendations to Government.)
- Recognise and support the AONB teams in their areas and the important role of AONB partnerships in providing specialist advice into the planning process; and by providing a secure budget contribution to their local AONB(s).



Case studies

Kent Downs AONB 521 houses

STATUS: AWAITING LEGAL JUDGEMENT

Nestled in the Kent Downs, AONB is the Farthingloe Valley, with its unique and dramatic views, rich habitats and ancient woodland. This beautiful, green landscape runs parallel to England's iconic White Cliffs of Dover. Legend has it that the spectacular valley inspired a scene in King Lear, and later, the naming of nearby Shakespeare Cliff.

In 2013, Dover District Council approved the building of 521 houses and a 90-apartment retirement village in the Farthingloe Valley, despite its protected status. At the time, this was the single largest development proposed within an AONB. CPRE Kent launched a concerted campaign to save the landscape's precious heritage, and to prevent a dangerous

national precedent being established. The Government ignored CPRE's evidence-based arguments that this development was unjustified and unlawful, and refused to call in the application for decision. The local council's planning committee then granted planning permission against the advice of their officers. Undeterred, CPRE Kent fought this decision through both the High Court and the Court of Appeal.

Last year, the Court of Appeal quashed the planning permission, because the council failed to give legally adequate reasons for their decision to grant permission. Now we are waiting to see if this decision is upheld by the Supreme Court.



Farthingloe Valley



View from the Western Heights

High Weald AONB 600 houses

STATUS: WORRYING PRECEDENT

The exceptional character of the High Weald AONB was shaped in the 14th century. Today its historic rolling hills, small patchwork fields, sunken lanes and abundant woods are considered one of the best surviving medieval landscapes in Europe.

Yet last year, Mid Sussex District Council (MSDC) rubber-stamped the building of 600 houses at Pease Pottage while the local plan was being examined.

Their argument for what would be among the largest single developments proposed for an AONB was that it would help to meet housing targets for nearby Crawley.

In reality, these targets are inflated and undeliverable. Even Crawley Borough Council objected to the proposal. CPRE Sussex delivered a compelling case to MSDC: that the siting was wholly inappropriate; the type of houses would not meet genuine local need; local people

did not want the development, and that building in this sensitive location was contrary to national planning policy.

In spite of all these objections, this development has been approved, sacrificing a treasured landscape and setting a deeply troubling precedent for large-scale housing development in AONBs.

South Devon AONB Community-led housing

STATUS: THE SOLUTION

South Hams District Council and Plymouth City Council are consulting on a joint local plan, setting out where potential development could take place in the South Devon AONB and how the area will change through to 2034. They are looking to neighbourhood plans to identify a proportion of the councils' housing allocation target.

Many of the neighbourhood planning groups now emerging in South Devon AONB are responding directly to the growing pressures for housing allocations and the increase in speculative

applications driven by the lack of an up-to-date five-year housing supply. This is a positive, community-led solution that allows people to protect what they value about their local environment while influencing the location and design of housing development.

The South Milton neighbourhood plan, for example, which will be put to a referendum in early 2018, has an allocation for a site for about 18 homes which received overwhelming support from local residents. It is tucked away in a natural hollow surrounded by a green

buffer, far from the sensitive coastal fringe, on brownfield land with good access to the main road. The development is intended to provide the required housing for the next 15 years (33% affordable, 33% self-build and 33% open market), as well as offering significant community benefits. The neighbourhood plan group intends to use the so-called St Ives clause – banning new-build second homes – to ensure that the new housing is lived in and contributes to the vibrancy of the community.



CPRE fights for a beautiful and living English countryside that is valued and enjoyed by everyone.

From giving parish councils expert advice on planning issues to influencing national policies, we work to promote, enhance and protect the countryside.

Our work

Our campaigning is evidence-based and reasoned, as well as passionate. We are experts in the planning system and landscape character, locally and nationally. We have a long track record of achievement dating back over 90 years. We do not own land but defend the countryside in the public interest.

Our aims

- To promote and enhance the character of the countryside.
- To promote a more sustainable approach to land use.
- To defend the countryside from damaging development.



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