

# FIELD WORK

#### Summer 2018

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### Why Local Enterprise Partnerships must do more for rural England

Survey published by CPRE in June shows that Local Enterprise Partnerships (LEPs) are perceived, by almost two-thirds (60%) of respondents, as having a negative impact on issues affecting the countryside.

Local Enterprise Partnerships (LEPs) are business-led partnerships between the private and public sector, designed to support and promote growth in economic areas defined by local business interests and local government, and agreed with central Government. To inform our *Next steps for LEPs* report, CPRE asked its local groups (a total of 44 survey responses were received from 34 CPRE branches, covering 32 out of the 38 LEPs) how these business-led partnerships were affecting rural communities and the countryside. While designed to support and promote growth in their areas, the research found that LEPs may be entrenching inequalities within and between English regions rather than removing them, with investment three times more likely in an already economically buoyant area than one in social need.

The results demonstrate that many LEPs are failing rural communities by ignoring their economic potential, as well as social and environmental needs. Despite having a key responsibility in administering the Rural Development Programme for England, only 21% of LEPs featured in the survey were perceived as aiding the development of affordable rural housing and just 14% work to address or improve rural transport. This lack of housing and infrastructure for those who work for and support rural businesses could hinder the growth of those economies.

#### **Rural areas falling behind**

The absence of investment in rural economies, which provide 13% of England's employment, exacerbates issues facing much of the country, such as the need for more regeneration, housing, sustainable transport, broadband connectivity and support for new entrants into farming. It also contributes to a growing inequality, which leaves many rural areas behind economically and socially. Furthermore, only 21% of LEP websites that were surveyed appear to clearly provide evidence of their economic activity and less than one quarter of LEPs hold public meetings. CPRE believes that LEPs should be expected to produce and publish Rural Plans, particularly to help support and encourage smaller farms and land-based enterprises.

Paul Miner, Head of Strategic Plans and Devolution at the Campaign to Protect Rural England, said: 'Local enterprise partnerships are supposed to be more sensitive to the needs of rural communities, businesses and economies than the regional development agencies they replaced. But our local groups are telling us that too often LEPs are remote, back developments that will happen anyway, and are not doing enough to support

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CPRE works locally and nationally to stand up for the countryside: to protect it from the threats it faces, and to shape its future for the better.

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rural regeneration. Rural businesses, including small farms, account for almost a quarter of all registered businesses in England – their importance to our economy cannot be ignored any more.'

#### A lack of accountability

LEPs matter because they are gaining increasing responsibilities for public spending on regional development across England. Over the period from 2014 to 2020 they have been given, in total across the 38 LEPs, £6.5 billion of European funding and £7.2 billion across three successive rounds of Growth Deals concluded with the UK Government. The European element of the funding partly covers rural development, and LEPs are also encouraged to work closely with Local Nature Partnerships (LNPs) on delivering environmental improvement.

But great concerns have been raised about the failure of LEPs to take rural and countryside issues into account, as well as their governance, transparency, and accountability. All LEP boards are chaired by a senior business figure and at least half (and often more) of the boards consist of people from the business sector, with the balance coming from local government and few if any members from environmental groups or other NGOs. This was borne out by findings that suggested LEPs take little interest in sustainable transport options, preferring instead to promote damaging and expensive road building schemes.

#### "Great concerns have been raised about LEPs governance, transparency, and accountability"

On rural and countryside policy issues, there is a clear feeling that LEPs are having a negative impact (60% of responses). Many LEPs appear to lack a rural reach and need to do more to address this deficiency. Coverage of environmental and social issues is inconsistent: we are aware of only 50% working with their equivalent LNP; only 21% on rural affordable housing; and just 14% on rural transport. A potential example of good practice includes the work of LEPs in the South West to set up a Rural Productivity Commission, which reported in 2017. The Commission has come up with a number of exciting ideas for investing in affordable housing, small farmers and natural and cultural heritage and we look forward to the sponsoring LEPs taking these up.

#### "LEP's should provide for meaningful representation of the environmental sector on their boards"

#### **Next steps for LEPs**

CPRE are making 12 policy recommendations, both for government and LEPs, based on the survey results. We believes that though taking sure measures, rural areas will be better supported, and their economic potential utilised. Firstly, we'd like to see a requirement for all LEPs covering rural areas to produce and publish a Rural Inclusion or Productivity Plan, setting out how agricultural and rural development fund money is spent, and how the LEP is contributing to the roll out of rural broadband connectivity and improved speeds. We also believe LEPs should provide for meaningful representation of the non-statutory environmental sector in their programmes and on their boards, so that landscape and biodiversity concerns are considered in decision-making.

We called for LEPs to prioritise the most sustainable development that will benefit most people, such as regenerating communities with large areas of brownfield land and empty homes and buildings before investing in greenfield development. We argued that more investment in sustainable public transport (including bus, cycle and pedestrian links to railway stations) over road building projects could revitalise transport links in rural areas. Finally, to ensure continued progress, we suggested that performance on the key environmental and social indicators for the LEP area are measured, and published, based standardised output metrics.

The report prompted an encouraging reaction from the Chairman of the Local Enterprise Partnership for York, North Yorkshire and the East Riding, David Kerfoot, who spoke of its potential to help farmers and rural communities boost their long term sustainability: 'Whilst many LEPs may have a focus on cities, as the largest rural LEP, our focus is firmly on our agenda to build recognition of the area as a rural powerhouse.' The Sheffield City Region also responded by highlighting their support to the 'hundreds of exciting small rural businesses in this region [with] lots of talent and fresh ideas.'

Confirming that CPRE's report had raised an important issue, we welcomed the LEP Network's statement that 'LEPs are acutely aware of how vital it is that all areas benefit from economic growth, and have initiated a raft of programmes to help boost rural economies.' We hope that all rural LEPs will build on such statements, and other recent signs of progress, in order to both create thriving rural economies and help safeguard our countryside. Fundamentally, we need LEPs to become more sensitive to the needs of rural communities, businesses and economies than the regional development agencies they replaced.

Find out more: Read CPRE's full survey and report at www.cpre.org.uk/resources

## BREAKthrough

How our work is making a difference

#### A victory for local democracy

CPRE Sussex were celebrating in June after plans for a damaging incinerator development in Horsham were rejected.

West Sussex County Council planning committee decided, in an 8 to 4 vote, to dismiss the application for a 'recycling, recovery and renewable thermal treatment facility' by haulage firm. Britaniacrest. Concerned residents were present at the meeting and cheered on the vote brought forward by Councillor Barnett-Miles and seconded by Councillor Barton. Branch chair David Johnson spoke in opposition, alongside North Horsham Parish Council and Norman Clarke of the No Incinerator 4 Horsham community group. David Johnson said that each statutory authority was 'passing the buck from one to

the other', while the information and assessment on pollution provided by the applicant was 'found wanting'. Local West Sussex County Councillor Peter Catchpole described the proposal as a 'visually colossal ugly incinerator', adding: 'This development is the wrong technology in the wrong place squeezed on too small a site.'

Back in April, CPRE Sussex's Dr Roger Smith warned that 'the cumulative impact of dioxins and of any other persistent pollutants emitted by the facility' seemed not to have been assessed, and the branch demanded a full investigation into the impact on farmland, livestock and the natural environment, including habitats, biodiversity and ecology. Britaniacrest's plans also include a vast 95m chimney which, said CPRE Sussex Director, Kia Trainor, 'would blight the natural beauty of vast areas of rural landscape within Sussex and Surrey.'

No Incinerator 4 Horsham said: 'Democracy is alive and kicking. We have to thank the 8 councillors that read the documents. questioned the officer's reports and that of the applicant having undertaken their own research to substantiate facts. These councillors acknowledged the visual impact of such a massive industrial building and chimney; the HGV impact on the roads and homes transporting waste to the site from other counties; impact on public health; cumulative impact; concerns over decline in air quality; and that over 5,500 residents oppose this application.'

#### Gladman gives up in Kent

Land promoter Gladman Developments has pulled out of plans for houses in Charing, Brabourne Lees and Biddenden, after mounting appeals to challenge Ashford Borough Council's housing land supply.

CPRE Kent, together with local parish councils, supported the borough council's decisions to reject 125 homes in Brabourne Lees, 245 in Charing and 110 in Biddenden. Now, after recent Local Plan hearings, planning inspectors have confirmed that Ashford Borough Council does have an adequate five year housing land supply. Having already withdrawn its appeal on the Biddenden site, the developer has abandoned the other two schemes. Jill Leyland of Charing Parish Council said: 'It is a real relief to know that the threat has been lifted. Ashford

Borough Council, CPRE Kent and a number of individuals worked extremely hard on this case, and we are truly grateful for all their efforts. We just hope that Gladman and other developers like them now realise how much opposition they will meet if they try to develop unsuitable sites in this part of the countru.'

Councillor Paul Clokie, portfolio holder for planning at Ashford council said: 'The council cannot prevent applications being made on sites that are not allocated for development in its Local Plan, and any applications that may, are considered on merit at that time. However the council will continue to take a Local Plan led approach, including consultation with local residents, to meet the development needs of the borough and we will strongly

resist any inappropriate or unjustified development.'

CPRE Kent had given extensive evidence to the public inquiry into the Charing appeal, pointing out that the site was in a flood zone outside the village envelope, and on the edge of the Kent Downs AONB. CPRE Kent's Richard Knox-Johnston said: 'This application by Gladman is speculative and is typical of applications they have made throughout the country, as described very clearly in the BBC One programme Countryfile. They are speculators and, having gained planning permission, will sell it on to a developer, [making] serious profits out of this fault line in the planning system.' The branch also gave public inquiry evidence on the application for Hospital Field in Brabourne Lees, and thanked Brabourne Parish Council and the people of the village 'for their efforts in seeing off this wholly inappropriate scheme.'

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#### Creating a major road network

Earlier this year, CPRE responded to the government's Moving Britain Ahead consultation on proposals to create a major road network (MRN). We set out a summary of our approach to the proposals and how we feel they could be improved for the benefit of the English countryside. CPRE disagreed with many aspects, not least the foreword provided by the Secretary of State on his wish for the MRN to 'open up land to allow muchneeded housing and the development of bypasses to relieve communities of intrusive traffic'. We are very concerned that such a policy intervention would result in ribbon development that will lock communities into an unsustainable cycle of cardependency.

We regret that more sustainable solutions mentioned in the consultation - such as 'making road layouts more efficient' - are not developed further. We hope the Department for Transport will consider this point as MRN funding bids are developed, and we believe there remains scope for investment planning to benefit communities. To help achieve this, CPRE and other NGOs are calling for the minimum project budget to be reduced from the £20m limit This would allow smaller improvement schemes to be considered, in particular measures to reduce noise, air, and light pollution, and fund more efficient solutions - like walking, cycling and public transport. The specific exclusion of public transport enhancements from funding bids is a missed opportunity

for developing genuinely sustainable travel choices. Our response also urged decision-makers to put high quality design at the heart of any proposals, so that the landscape remains integral to road users and local communities.

## **NEWS**roundup

#### Keeping you on top of countryside developments

#### **Renewed opposition to Arundel bypass**

CPRE recently joined nine other national transport and conservation organisations in calling for a review of the Arundel bypass in a joint-letter to the Transport Secretary Chris Grayling and the Environment Secretary Michael Gove.

The coalition, including the Campaign for National Parks and the Woodland Trust, remains concerned that Highways England's preferred option will destroy six hectares of ancient woodland, a swathe of the South Downs National Park and the Arun Valley - an area much enjoyed for its tranquillity and wildlife. The letter, delivered in May, argues that building this route would be contrary to national policy and guidance and would set a dangerous precedent, with our finest landscapes and natural habitats no longer safe from damaging infrastructure.

The organisations believe that Highways England's preferred option should be rejected, and that an alternative package of measures should be developed for Arundel to avoid loss of ancient woodland and harm to the National Park. We have serious concerns about the public consultation held last year - they say that at no time has Highways England seriously attempted to find other ways to address the transport issues, as it is required to do. The Daily Telegraph reported in July that local campaigner Emma Tristram, of the Arundel Bupass Neighbourhood Committee, had submitted an application for a judicial review of the decision, saying: 'It would be incredibly damaging and the worst of the three options, having a major adverse effect on wildlife, the countryside, the villages it will tear through.

Daniel Careu-Dawes. CPRE's senior infrastructure campaigner, told *The Telegraph*: 'Carving up the countryside in order to prevent a six minute delay is an excessive and unnecessary response. Even if the proposed bypass provides some temporary relief for this section of the A27. evidence shows that the building of more and bigger roads often induces new traffic on those roads.' Bypass project manager Sophie Hartfield has argued that the scheme 'will draw traffic away from smaller roads through the national park, [and] reduce traffic in and around Arundel's historic town centre.' However. the South Downs National Park Authority has also applied for a judicial review, with chair Margaret Paren calling for engineers to devise a scheme to take vehicles out of the National Park, rather than through it.

#### Winning a nationally important review

#### CPRE Surrey welcomed the High Court decision on July 12 to proceed with a judicial review of the Waverley Local Plan.

The branch and the Protect Our Waverley campaign group both challenged Waverley Borough Council's decision to adopt a Local Plan with inflated housing figures imposed on it by Planning Inspector Jonathan Bore, supposedly to meet 'unmet housing need' from Woking Borough Council. The additional 1,500 new houses would mostly have to be built in protected countryside. Andy Smith, Surrey Branch Director of CPRE, said: 'This is a nationally important case with far-reaching consequences, so we were pleased that the High Court agreed that our application for a judicial review of the Waverley Plan should go forward.'

Andy continued: 'The key issue for CPRE is whether a borough

such as Waverley, with significant constraints on growth (Surrey Hills Area of Outstanding Natural Beauty, Areas of Great Landscape Value, Metropolitan Green Belt. and countryside beyond the Green Belt) should be forced to accept an arbitrary increase in its housing numbers in order to meet the 'unmet need' of another borough, in this case Woking. The 1,500-plus additional houses would have nowhere to go but in protected AONB countryside, and this is surely unacceptable. In our view the housing targets being imposed on Waverley - and indeed Woking and Guildford too are excessive and unsustainable. and made more so by the Inspector's decision to add these 'uplifts' to the borough's housing target without considering the impact on the Surrey Hills. We look forward to the opportunity to present our arguments fully in court when the time comes.'

In other good news from Surrey, May saw a positive decision on a developers' appeal against Elmbridge Borough Council's refusal to permit a so-called Green Belt 'garden village' – Drake's Park. The appeal was dismissed by the Secretary of State, James Brokenshire MP, after he agreed with the planning inspector's conclusion that despite the housing land falling short of the five years required, the benefits of an early supply of housing in a heavily-constrained Green Belt borough did not outweigh the harm to the environment. Instead the inspector concluded that housing need in this case did not amount to the 'very special circumstances' required to justify release of this land, as the challenge of building more houses in areas with lots of Green Belt is shared by many boroughs all around London.



#### Health and harmony for food and farming?

May saw CPRE respond to the Government's 'Health and Harmony' consultation on the future of agricultural policy post-Brexit. In it, we welcomed the Government's commitments to reversing environmental damage, linking public funding to the delivery of public benefits and maintaining high standards in trade agreements.

CPRE also reasserted that long-term public investment in the environment through farming is vital if we are to deliver the 25 year environment plan. More specifically, we called for the creation of a dynamic, innovative farming sector through the removal of Direct Payments and their replacement with a system incentivising the provision of public goods. We argued that this transition should be done gradually, and must not drive further heavy loss of smaller farms. So we welcome the government's June statement that it 'intends to use the period of the "agricultural transition" to give smaller family farms adequate time to prepare for the future and to support them in doing so.' We've also asked that consideration should be given to applying a different model to uplands and common land, and areas where there are greater numbers of smaller farms, particularly with grazing livestock, such as the Blackmore Vale in Dorset.

Another CPRE priority is to enhance landscapes through agricultural policy, particularly those around urban areas where most people live. The decline in habitats like hedgerows and flower-rich meadows must be reversed, and will help prevent soil erosion, store soil carbon, and support pollinators, natural predators of cereal pests and ground nesting birds, as well as enhancing the landscape. We also made the case that with CPRE research showing the huge benefits of local food networks, future policy should

recognise the value of the domestic market for local and regional food.

Finally, ahead of our forthcoming Farming Foresight report on soil, our response called for more action to improve soils to benefit both farming and the environment. We welcomed the inclusion of healthy soil in the consultations list of priorities, but challenged the Government to be more ambitious about using planning to protect high quality soil as an irreplaceable and strategically important national resource. The average rate of loss of agricultural land is at its highest level in decades, at over 10,500ha on average per annum, and three times the rate of loss in the 2000s. This is despite a degree of protection in the National Planning Policy Framework's protection of best and most versatile land. Policies need to be improved and joined up to stop this loss.

#### Pushing back on pointless plastic

After 10 years of dogged campaigning, led by CPRE with support from partners including from Surfers Against Sewage and the Marine Conservation Society, we were delighted by Environment Secretary Michael Gove's late-March announcement that England will be getting a deposit return system for bottles and cans.

It was a game-changing decision, but CPRE is now focusing on making sure the consultation process delivers a final scheme that has the greatest possible impact on litter reduction and increased recycling. Meanwhile, CPRE has taken part in another recent consultation, run by the Treasury, looking at how taxes or charges could help address single-use plastic waste. We submitted a joint response with a number of other environmental organisations, setting out the most effective potential solutions. We also submitted a short response of our own, outlining our key principles for tackling the plastic problem by prioritising action against the plastics that are most likely to end up as litter in our countryside and waterways.

Fundamentally, we argued that any policy to tackle singleuse plastics should follow the Government's duty in relation to the waste hierarchy, and focus on the reduction of waste. Recycling should not be the first choice solution, but instead the mantra of reduce, reuse, recycle, recover and (in the last resort) disposal, should be adhered to. We argued that financial incentives should be introduced to change behaviour and not as a money raising exercise; should only be directed at consumers where genuine, readily-available, and reasonable alternatives to plastic packaging exist; and should be part of wider reforms to the UK's waste system under the banner of 'Extended Producer Responsibility' (EPR) - a system that follows and guarantees the 'polluter pays' principle. We also called for unnecessary single-use plastics - such as plastic cutlery and straws - to be banned immediately.

If designed well, taxes and charges have an important role to play in tackling the scourge of plastic waste and litter, but the government needs to get them right. These key principles will help ensure a long-term solution to litter in our countryside.

## <mark>dates</mark> of note

#### Windermere Sunset Canoeing

Celebrate Great Landscapes Week with the Friends of the Lake District, and a chance to appreciate the lake's spectacular tranquillity and beauty. 7th August (7pm) – see www. friendsofthelakedistrict.org. uk/Pages/Events/

#### Dunton Community Garden walk

Join CPRE Bedfordshire for a visit to a beautiful organic garden designed and tended by local people. 2nd September, Dunton, Bedfordshire See www.cprebeds.org.uk/ events for details

#### An evening with Simon Jenkins

Hosted by Suffolk Preservation Society, the former National Trust chairman and one of Britain's most prominent journalists talks about Britain's 100 Best Railway Stations. *Friday 21st September (6.30 for 7pm), Framlingham College IP13 9EY* £18, tel: 01787 247179; email: sps@suffolksociety.org

#### CPRE Hampshire Quiz Night

This highly awaited multimedia quiz returns with even more brain teasing questions. Bring along a picnic supper to this wonderful evening to enjoy with friends on tables of 6. Friday 26th October, Village Hall, Main Road, Itchen Abbas, S021 1BQ £15 including a glass of wine. See www.cprehampshire.org. uk/events

#### REPORTAGE

## Current issues

**Standing up for Suffolk** June saw the Suffolk

Preservation Society (SPS), who represent CPRE in the county, help defeat an application from Konings Juice Ltd for extensive new warehouse and storage buildings. The plans would have extended the former Copella juice business and introduced a canning facility on the site at Boxford Fruit Farm, Polstead, within the Dedham Vale Area of **Outstanding Natural Beauty** (AONB). Campaigners argued that the enlarged business had outgrown this unsustainable location and urged that relocation to a site nearer the main road network and outside the AONB should be sought. The application has since been withdrawn and a scaled down scheme is now proposed. SPS will be examining the new proposals and commenting as appropriate on aspects impacting on the landscape and AONB character. Earlier this summer, SPS ensured another inappropriate application was withdrawn on a site which provides a strategic gap between the allocated Ipswich Garden Suburb and the village of Westerfield. They successfully argued that the 22 dwellings on a greenfield site would harm the setting of The Glebe, a grade II listed building, and the wider setting of the grade I parish church.

### Saving London's green spaces

CPRE London are pleased to have helped save Oakfield playing fields in east London from development. Meanwhile in Barnet, the branch successfully opposed a school's plan to expand into the Green Belt, and ensured that sites proposed for development in Sutton were removed from the Local Plan. CPRE London has worked with Greenspace Information for Greater London to comprehensively map London's protected land for the first time - a move that campaigners hope will help with future monitoring.

## letterfrom thefield

Words from local campaigners

#### CPRE Cambridgeshire & Peterborough volunteer Lizzie Bannister writes on why people in the countryside need more transport options

#### Dear reader,

I passed my driving test a month before I turned 30... wow, what an achievement. But it does grieve me that, as an environmentalist, I am contributing to land loss, pollution and unavoidable road kills - including of flying insects, a much-needed source of food for birds!

However, there are snippets of comfort for my green conscience. I drive a small and fuel efficient car. and drive it sensibly, not speeding, braking harshly or making unnecessary journeys (I still walk down the street to attend to my pony and his companions). Another mitigating factor is that because I can use my new found independence to go anywhere and everywhere, I get to support my local nature reserves and countryside places – including many that were inaccessible to me. Woodwalton Fen, Wicken Fen, Holme Fen, Gault Wood, Ramsey Abbey Gardens and Anglesey Abbey are already visited and enjoyed - and will be again and again. And I keep in mind other places I can and will visit, such as Paxton Pits, Monk Wood and John Wood.

I am thrilled with my new life and weekends these days. I used to just ride, read and watch movies; now I can add visiting countryside places to that list - and I've already taken my sister around Holme Fen! My car opens the world to me, and I am revitalised back into my previous life of conservation science - I plan to use my car (christened Mistibu) to go on courses offered by the Wildlife Trust and have had already supported the RSPB, inspired by the promise of being able to visit their nearby reserves. I could also now apply more easily to a countryside-based job, such as water quality technician or wildlife ranger, because many conservation jobs require a driving licence.

But while the car is helping me to engage with and value the countryside, it is essential that other more sustainable means of transport are considered by policy makers. Just because I have a car and want to drive everywhere, it does not mean that I want the countryside to be built over with tarmac, or for roads to be at the forefront of planning decisions. Countryside conservation and the availability of multiple transport options is paramount to social responsibility - both in terms of maintaining quality of life by protecting the natural environment, and allowing

those who cannot drive to become mobile.

Improving rural public transport would create a positive sustainability spiral - allowing more people to access jobs and services, and be more able to enjoy and appreciate the countryside. And I've recently discovered, from ACRE's archives, that CPRE played a historic role in improving the experience of drivers and pedestrians in Cambridgeshire: planting trees alongside roadsides - such as from March to the Mill Hill roundabout, and getting motor companies at St Ives and Foxton to ameliorate their corrugated-iron fences appearance - including by painting them green.

By helping to reduce the number of cars on the road, better rural public transport would also help restore the pleasure of travelling on our country roads, and alleviate the need to build new ones. Let's make the most of what we've got and manage our problems without using up our most valuable asset – our glorious green land.

Find out more: Take a look at the latest news and volunteering opportunities at CPRE Cambridgeshire & Peterborough at www. cprecambs.org.uk

## GOODideas

Learning from each other

### Teamwork transforms tennis courts

The Friends of the Lake District, CPRE's representatives in the National Park, recently helped the Beaumont Parish Hall Management Committee revitalise derelict tennis courts which had become an eyesore in the hall grounds.

The Friends' Landscape Grant Fund helped the committee provide a space that the community and visitors will be able to enjoy: volunteers and farmers planted 1,100 individual plug plants on the site and scattered a large quantity of seed, creating a new meadow area and what will eventually become a woodland area. The Landscape Grant Fund has been running for many years and funds small scale projects and works that will conserve and enhance the landscape (and within that flora and fauna, cultural heritage), connect people with it and aid their enjoyment of it. Grant support is open to charitable organisations, voluntary and community groups, schools, social enterprises and local councils or conservation agencies and there are no application deadlines as the grant is open all year round.

Find out more at www. friendsofthelakedistrict.org. uk/grants-overview

#### Supporting Cornwall's market towns

CPRE Cornwall achieved excellent press coverage with their spring calls for two hours' free parking in all council-owned car parks across the county.

Campaigners argued such a scheme would counter the damage caused to town centres by out-of-town retail developments. In a letter to all the county's MPs and Cornwall Councillors. branch chairman Richard Stubbs wrote: 'We are very concerned that creeping out-of-town retail developments with free parking is causing serious damage to the retail heart of our town centres. The current situation is unfair all round. Big retailers, encouraged by the opportunity to offer free parking, usually build on green field sites, destroying our countryside and wildlife.

Shoppers and visitors to our town centres are being driven away by car parking charges. We believe the current policy of charging to park in town centres is self-defeating and requires an urgent review to combat shop closures. We do not see standing by and just collecting the car parking income as an option any more. We are proposing therefore that in council-owned car parks in all our Cornish towns and villages, parking should be free for two hours.'

The campaign was welcomed by Alun Jones, manager of the Truro Business Improvement District, who said: 'We do see a direct link between free car parks and increased spend in town centres. When, in December, the town centre car park was free we saw the direct benefits as shops stayed opened longer and shoppers came out into town longer. We would support anything by Cornwall Council that boosts trade into our town centre. Why not have a monthly free car park day on pay day weekend? It would be a great incentive to shoppers to come into town.' Richard Stubbs added: 'We believe it is essential that free car parking in all towns and villages in Cornwall should be introduced to enable fair competition. The smaller shops and businesses in our Cornish towns sustain and give life to the rural economy. They nurture and encourage our sense of community and are a priceless asset of Cornwall. Making free and easy access to our rural towns will be a step in the right direction to a return to prosperity.'

#### Woodland walk success

An annual charity walk in and around Ellisfield, north of Alton, raised more than £2,400 for CPRE Hampshire in April.

Organised by Hannah Houstin-Lacey, from the North Hampshire District Group, the event attracted more than 50 walkers and their dogs – including constituency MP Ranil Jayawardena, who gathered at Ellisfield village hall for either a seven-mile or three-mile walk taking in the bluebell woods. Hannah has since been rewarded for her efforts – which include many years of fundraising activity - with a CPRE Positive Contribution Award, presented at the Colemore Gardens open day. Anyone who feels inspired to volunteer with the branch should contact Michelle on volunteering@cprehamphsire. org.uk or call the office on 01962 841 897.

#### Trees for Cheshire and Devon

Plans for a new Northern Forest stretching from coast to coast have been welcomed by CPRE Cheshire, for its emphasis on more sustainable management of existing community woodlands, as well as on planting new trees. Northern parts of Cheshire fall within the scheme. including the Sankey Valley Country Park; Northwich Woodlands, Delamere Forest and Lewis Carroll Wood: and the Nature Reserves of Moore, Marshall's Arm. Pickering's Pasture and Risley Moss. Developed by the Woodland Trust and the Community Forest Trust, the initiative aims to improve air quality across a swathe of England, with the M62 roughly bisecting the area; fifty million new trees are set to be planted over 25 years. The forest should also help to reduce flood risk, provide economic opportunities through tourism and forestry, and increase the amount of accessible woodland around some of the north's biggest cities.

Meanwhile, in Devon, CPRE Torbay are delighted to be assisting the Friends of Grove Woods group which launched recently. The huge task is to replant 21 acres of woodland on the Brixham Peninsula which was felled due to larch disease. The land is managed by Torbay Coast and Countryside Trust which is working with the community to raise considerable funds. Tree planting by contractors and volunteers will use many native species, including oak, and CPRE Torbay are looking for support to help fund and run this exciting and positive project. For more information contact: Carole Box torbay@ cpredevon.org.uk

#### Good news from Dorset

**CPRE** Dorset were celebrating in June after East Dorset District Council informed them that Good Energy had formally withdrawn its application to construct a 24 MW solar park on 106 acres of unspoilt countryside owned by South Dorset MP Richard Drax. The decision represented the culmination of an intense five-year campaign involving over 700 written objections and two successful judicial reviews. But, despite Good Energy's withdrawal, Mr Drax has not given up his long held desire to use his land for another energy development, potentially requiring the construction of an industrial building larger than the substation. However, CPRE Dorset are hoping that it will not come about given the difficulties of designing a profitable development on this site which would pass the scrutiny of the council's planning team, now made very vigilant after losing two judicial reviews over Mapperton.

#### **Restoring green fields**

**CPRE** Warwickshire welcomed news that a planning inspector rejected an appeal for a 265,000 sq ft industrial park and a rail distribution depot within the Green Belt, at the Daw Mill Colliery site. The inspector largely upheld the requirement to return the land to how it was before the colliery was built, and campaigners thanked all those involved in this significant achievement. CPRE Warwickshire stated: 'In upholding the Borough Council's decision, the Inspector indicated that the possibility of the site returning to a green field, in accordance with the Restoration Plan, needs to be taken into account not only as a material consideration but as the baseline comparative scenario'.

## stepbystep

Guide to good campaigning

#### **Building on brownfield**

PRE Lancashire has released a new Brownfield Toolkit, available to download from their website, to support communities in highlighting brownfield sites in their local area, both to reduce development pressure on the countryside and to encourage the regeneration of unsightly or derelict sites.

The toolkit aims to facilitate the redevelopment of brownfield land by helping people to tell their local council about brownfield sites that might be developed, and to get them included in their Brownfield Registers (and other Land Supply datasets). Inclusion in the Register should increase a site's chances of being brought forward for development, while more comprehensive information will enable better use of all available brownfield land and reduce pressure on open green spaces.

Research by CPRE suggests that brownfield sites, particularly smaller ones, are still being missed out of these lists, and previous research has also highlighted the difficulties faced by planning departments in identifying small sites and getting them built out. So CPRE Lancashire has developed the Toolkit to enable neighbourhoods and planning departments to work together to maximise the potential for brownfield development in their areas. It has been road tested with local people and local planning officers and it should help community groups make the best use of their local knowledge to provide planners with the information they need, by using the following basic principles.

## Get your site registered

First, check whether the land you're interested in is already on the register. Googling '<name of your council> brownfield register' should take you to it. If not, you should be able to find it on https://data. gov.uk . Registers must be published as .csv spreadsheets. These may look a bit daunting at first sight! However, Government requirements are for the 5th column of each spreadsheet to be a list of site names and addresses, and the 6th column to contain a link to a plan of that site, and these two together should enable you to identify the sites that are listed. Many councils also provide maps and/or summaries of their Registers, which make identifying sites easier. If the land you are interested in is not on the register, it may be worth checking with your council whether it has been considered and rejected, and on what basis. It is worth telling your council about a site even if you are not able to complete all the information, but the more you can do. the better.

## Identify site address and size

Provide an address and/or description of the location of the site, which should be sufficient to identify its location, e.g. '36-40 Middleton Drive, Lancaster, LA1 1XX', or 'land off South Drive, between East Street and West Avenue, West Lancashire'. Include the name of your Local Planning Authority, for the avoidance of doubt. The free interactive map app www.scribblemaps.com automatically measures the size of any polygon that you draw on it. Go to the website, click on 'Create map', where you can watch one of the training videos it offers. To complete the identification, send a digital image that you have taken yourself with the completed toolkit, or include a link from a 'street view' website such as www.instantstreetview.com if it is sufficiently up to date.

## B Establish land use and ownership

Identify whether the existing use of the site is, for example: housing, offices, industry and warehousing, community use, open/vacant land etc. Include the general condition of existing buildings in your description: derelict, sound, capable of conversion to housing. If the site is vacant, try to establish its former use. Be as specific as you can, especially if it was the sort of use that may have led to any contamination of the land, such as a petrol station or industrial units. It is also useful to describe the surrounding land uses, and give approximate heights of adjacent buildings, as well as broad topographical information (flat or sloping).

If you don't know who owns the site, the owners of neighbouring properties or businesses may do. You can also search on HM Land Registry, although there is a £3 fee for this. A key issue for councils is often whether a site is owned by a Public Authority or not, so even just providing this information (Not / Owned



CPRE Lancashire's toolkit aims to help communities get brownfield sites like this included in their council's Brownfield Register

by a Public Authority) would be helpful. If you know of any developer interest in the site, it would be helpful if you could provide contact details. If you are in contact with the owner they may be willing to give you this information.

## Find out the site's

Does the site have planning permission, or is it awaiting a decision? You can find this out by contacting the development management team at your local council. Most councils will also have an online map or postcode based register for checking whether sites have planning permission. Do you know of any other previous planning applications, allocations in plans or permissions granted? The development management team at your local council should be able to tell you this.

## **5** Estimate housing capacity and suitability

Estimate the number of homes, and type of housing (and other) development that would be appropriate. The average density for housing is 40 dwellings per hectare, but at central town and city locations and near to public transport hubs, densities should are encouraged to be higher. In suburbs and rural areas densities may be lower. Your Local Plan. available on your council's website, should provide guidance. The type, number and density of homes will depend on the site's surroundings, context, and constraints, such as surrounding uses; the height, density, massing and design of nearby properties - new development should maintain or enhance the character of the area; and any effects on the amenity of nearby properties (e.g. shading or blocking sunlight) should be avoided.

Set out why you think the site should be developed for housing or other uses. This may be due to its location, its surrounding uses, proximity to public transport, retail, employment or other facilities. You may want to make reference to its current condition and/or uses. Contribution to an area's regeneration may also be important. Planning policies in your council's Local Plan may also provide support for development in certain places. You can help planners reach

their judgement on whether development is possible within five years, by giving evidence of availability, suitability and accessibility.

## **6** Be mindful of constraints

Are you aware of anything that is likely to constrain development of the site, such as the presence of protected species or habitats, flood risks and contamination, or the absence of utilities? Constraints do not necessarily prevent a site from being developed, but may indicate that particular care or mitigation is needed, or that additional work needs to be done to get the site ready, or that only part of the site should be developed. Your Local Plan Proposals Map/Policies Map (available on your council's planning web pages) should show whether the site is, or is part of, or is next to, any area designated for conservation value; whether it contains any nationally listed heritage assets; and if it is at risk of flooding. Your own observations should be enough to flag up any issues at this stage.

Find out more: Download the full toolkit from www. cprelancashire.org.uk

## Current issues

### New guidance on battery storage

With the Government encouraging the development of backup generation and battery storage in the countryside as means of increasing electricity supply, CPRE Wiltshire has produced a booklet exploring the issues raised by planning applications to implement these processes. Backup generation is usually provided by a cluster of diesel- or gas-powered engines, while battery storage can take the form of large numbers of industrial-scale batteries packed together. These industrial processes are presenting new problems for the countryside, using large steel-framed structures and converted shipping containers to house the equipment they require. A proposed development near Charlton, Wiltshire will include 17 converted shipping containers, each 16.1m long, standing 4.5m above ground level.

These alien features in the countryside are usually enclosed by a steel palisade security fence, which in turn is encircled by hedging and trees to 'mitigate' the visual and landscape impacts they create. CPRE Wiltshire recognise that new supplies of electricity are needed, but believe the sites chosen for building them should be carefully controlled. The industrial equipment these processes require should be sited in industrial settings, or on brownfield land. Only in exceptional circumstances should greenfield sites be used. But with little official guidance, the branch has joined forces with an engineering consultant who was formerly a manager at National Grid to produce the new booklet: Guidance for assessing planning applications for small-scale battery storage and backup generation facilities.

**Find out more:** read the latest news from the branch and download or order a copy of the new guidance at **www. cprewiltshire.org.uk** 

#### **Saving Mortimer Forest**

A petition to Save Mortimer Forest has been signed by over 5,000 people since CPRE branches in Herefordshire and Shropshire raised serious concerns over plans for 68 deluxe log cabins. The Juniper Hill site in the Mortimer forest, which borders Herefordshire and Shropshire, is a publicly owned space which the Forestry Commission proposes to lease to Forest Holidays for 125 years. If allowed to proceed, CPRE Herefordshire argues this commercial development will urbanise the forest, destroy its tranquillity, threaten wildlife and create widespread disturbance. noise & pollution. The forest is home to the only herd of long-haired deer in the world and is a favourite destination for walkers and nature lovers.

Colin Richards, a spokesman for Save Mortimer Forest campaign group and a former conservation officer for Shropshire Council, said: 'The petition has led to people using the area more and more. The area is being threatened and people are flocking to come to and see it for themselves. We have a unique window on old England and that's because it is very distinct.' The group recently welcomed the news Herefordshire Council would have the environmental impact of the proposals assessed. Meanwhile, CPRE Shropshire has requested that Shropshire Council and Ludlow Town Council be included in discussions, with Ludlow councillor Andy Boddington warning that increased traffic to the holiday chalets would damage surrounding lanes and towns. As Fieldwork went to press, Colin Day, a senior official at the Department for the Environment, Food and Rural Affairs, had been appointed to investigate the deal which had been struck between the Forestry Commission and the company.

## **PARISH**beat

Effective solutions for your parish

#### **Bedfordshire New Town abandoned**

PRE Bedfordshire have been working with residents of Souldrop and Sharnbrook to fight plans for a proposed New Town in the area, which would have been built on beautiful open countryside.

So there was a huge sense of relief when Bedford Borough Council emailed Town & Parish Councils in May, explaining that their Local Plan 2035 was to be put on hold because

the proposed New Town of at least 4,500 new homes (bigger than Ampthill) at Sharnbrook / Colworth will not be able to be developed. The council cited noise issues from the nearby Santa Pod Raceway, confirming the branch's belief that this was a seriously flawed proposal which would have had a massive impact on the villages of North Bedfordshire.

Susan Walls. Branch Manager for CPRE Bedfordshire said:

risk of flooding; and being likely

to generate additional traffic

that would overwhelming the

The officers' report to

concurring with many of CPRE's

concerns, and noting that the

development would undermine

the Planning Committee

the plan-making process

strategy of the emerging

and the sustainability and

delivery of the development

recommended refusal,

capacity of local roads.

## Helping parishes protect farmland

framework; involving a loss or arable land and rural landscapes; increasing light pollution and the

'This is a great success for CPRE Bedfordshire. Together with the campaign group Keep North Beds Green and local residents, we have fought against a New Town which would have been built on beautiful open countryside.' The branch fears that this still may not be the end of the battle. and with an outside chance that a New Town may go forward, they are remaining vigilant about any potential alternative sites that the council may choose to develop.

Local Plan. The officer also found the development would have adversely affecting the curtilage and wider setting of the Grade II listed building Hinxton Grange, and caused substantial harm to the openness and purposes of the Cambridge Green Belt. The councillors agreed and refused the application, but with the developer reportedly 'looking forward to pressing ahead', campaigners are expecting the plans to be submitted to the review of the Local Plan, expected to start in 2019.

applications through when so much is yet to be clarified?'

As Fieldwork went to press, CPRE Sussex had formally requested the application be 'called-in' for consideration by the Secretary of State, together with a separate application for commercial space at the airport. David Johnson highlighted the cumulative impact of the two applications on 'the strategic gap between Lancing and Shoreham; flood risk; the A27 trunk road; and the local landscape and heritage.'

With Hinxton, Duxford and Pampisford Parish Councils unanimously objecting to plans for a huge 'AgriTech Park' development on farmland near Hinxton (including a transport interchange on Green Belt land), CPRE Cambridgeshire & Peterborough were pleased to be able to add their support.

The application was for office and manufacturing space for businesses employing 4,000 or more people, but CPRE added to parish council opposition on the grounds of the proposal being outside the development

Fighting for the future of Lancing

An open letter signed by more than a dozen organisations urged Adur District Council to cancel July's meeting to decide plans for 600 homes and an IKEA.

The letter, signed by CPRE Sussex, Lancing Parish Council and Adur Floodwatch, implored the council's planning committee not to make a decision 'in haste', and 'against the spirit of localism and transparency', over land at New Monks Farm, west of Shoreham Airport. There were concerns that Lancing Parish

Council may not be allowed to take part in the meeting due to Adur District Council's use of a ballot system to choose speakers for and against the proposal. Under the present arrangement no exception has been made to accommodate the parish council as a democratic voice. prompting CPRE Sussex chair David Johnson to say: 'Adur should be working with the community to meet Adur's needs, not the developers. Why is there a rush to push these

## **CAMPAIGNER**Current issues

#### Tributes to our finest campaigners



CPRE Lancashire's fondly remembered Audrey Dawson

PRE's June AGM saw chair Su Sayer pay fond tribute to three great campaigners sadly lost to the organisation in the past year.

Howard Elcock was so important to our work in the North East, and to CPRE Northumberland in particular, helping to defeat so many threats to the spectacular countryside in that region. He made a real impact in working with communities - particularly in helping them protect their Green Belt, for which he was one of our greatest advocates. His leadership, expertise and enthusiasm will be sorely missed, but he leaves behind an active and influential CPRE presence, proudly working to honour his memory.

Another fantastic community campaigner was Audrey Dawson, of CPRE Lancashire. She has rightly been described by colleagues as 'a force of nature', and praised for her unstinting good humour. Audrey worked tirelessly to support local residents across the county – more often than not, with great success. She was a classic example of the dedication of so many CPRE volunteers - first signing up 45 years ago, and ultimately

becoming a devoted trustee.

Finally, Su remembered Martin Walton of CPRE Norfolk, who become involved during the nationally important campaign to save Halvergate marshes in the early 80s. Martin went on to develop the pioneering CPRE Norfolk Awards, as a way to promote positive approaches to good development. The awards grew in scope to include education projects, sustainable buildings, landscape improvements and restoration projects, and have inspired so many other branches to create their own schemes.

One more legendary pioneer of local CPRE campaigning was recently remembered by CPRE Kent, with a fascinating tribute by branch chairman Christine Drury in the latest issue of Kent *Voice*, reprinted here: 'Hilary Moorby joined CPRE in 1987 shortly after she and husband Jeff came to work at Wye College and live in Kingsnorth. Already a parish councillor, Hilary became a member of the CPRE Ashford district committee and showed how parish council and CPRE work could be combined to great effect.

As an ecologist she brought a clarity and energy to every discussion of green spaces

and buffer zones as well as to protected species, from bats to great crested newts to water voles.

As a campaigner she always adopted an approach of constructive criticism that was welcomed and greatly respected by planning officers and colleagues. Her evidencebased argument and well crafted, clear writing fitted comfortably with CPRE's way of working, her energy making her a very effective campaigner.

In 1998 Hilary took over as chairman of the Branch, and soon took on the considerable challenge of the Ashford Growth Plan, imposed by central government in 2003 to double Ashford's size. It involved serious master-planning and eventually a compact spatial strategy for the Local Plan that included a large urban extension at Chilmington Green. It was controversial because there was still brownfield land in Ashford after the building of the high-speed rail link, but Hilary was resolute that as the Plan was properly consulted upon, examined and adopted it was Plan-led development and the issue was not whether, but how, Chilmington Green was to be delivered.

The shape of CPRE Kent today, and the shape of Ashford today, owe much to the clarity and energy Hilary brought to each task, both in CPRE and as a member of Kingsnorth Parish Council, serving as chairman of both. Hilaru will be missed as a CPRE Kent trustee, as a member of the environment committee and as an indefatigable chairman of the Ashford district committee - her dedication to which resulted in her being one of the first to be awarded the CPRE medal, in 2015 - but most of all as a friend and colleague to so many of us.'

## issues

#### Effective campaigning in Sussex

Local campaigners and CPRE Sussex have been celebrating the withdrawal of an application to extract oil beneath Markwells Wood, in the South Downs National Park. Concern arose when UK Oil and Gas submitted plans to extract oil by acidisation from five new wells over the next 20 years. Posing potential safety risks to a major aquifer supplying Portsmouth, the plans were opposed on environmental grounds and the application was dropped. UK Oil and Gas has been ordered by the South Downs National Park Authority to restore the area to woodland by March 2019. Emily Mott, representing Markwells Wood Watch, said: 'We are absolutely thrilled that UK Oil and Gas has been told to withdraw all their equipment and restore the site'.

In other Sussex successes, an appeal over a development of 30 houses at Buckles Wood, North Chailey has been refused in line with the branch's objections over the landscape impact and unsustainable location. CPRE concerns were also a factor in Mid Sussex District Council's rejection of a proposed development of three executive homes on the former Slaugham Garden Nursery site, in the High Weald Area of Outstanding Natural Beauty.

Elsewhere in the county, a proposal for remodelling Cuckfield golf course was been withdrawn, saving 500,000 tonnes of waste material being imported by HGVs over a three-year period. Local CPRE member Gerard Conway worked hard forming an action group and generating much needed opposition, while Nick Daines provided invaluable technical expertise regarding waste translocation.

**News from North Yorkshire CPRE North Yorkshire were** delighted by a recent notification from North Yorkshire County Council that a Traffic Regulation Order (TRO) in place on Seggimire Lane (a medieval route near Whitby) would be kept indefinitely, making the order permanent. The branch had fed into a consultation in 2017, urging the council to exclude all non-essential motor vehicles to protect this ancient green lane. They noted the heritage value of the Seggimire Lane as an ancient 'trod', paved in part with old flagstones, and its importance to the character of the North York Moors National Park. Arguing that a permanent TRO would aid conservation and increase opportunities for walking and horse riding, they also pointed out that self-regulation had proved unsuccessful, damaging and expensive in the Peak District National Park.

The branch had further reason to celebrate in June. when Harrogate Borough Council refused an application for 50 dwellings at Kirkby Hill. Our campaigners had been highly active in their opposition following requests for assistance from local people. They pointed out that 'after public inquiries in 2003 and 2010, the Secretary of State concluded that the landscape to the north of Kirby Hill cannot assimilate large-scale development and that such proposals would be contrary to the Harrogate District Landscape Character Assessment'. In less positive news, campaigners were dismayed to learn that the Yorkshire Dales National Park withdrew its objection to the enormous leisure site on its boundary. CPRE North Yorkshire continues to argue that the proposed Hellifield Flashes site is of vital importance for local biodiversity - including at two nearby Sites of Special Scientific Interest - and are supporting the local action group, Save OUR Craven Countryside.

## **INTERVIEW** Our perspective on countryside issues

#### Nature in our National Parks

995's Environment Act defined the aims and purposes of National Parks, with the first being to 'conserve and enhance their natural beauty, wildlife and cultural heritage.' But are we achieving the 'wildlife' element of this? The State of Nature 2016 report found that 56% of species declined between 1970 and 2013, and critics say that National Parks (covering nearly 10% of England) are not doing enough to buck this trend.

The Campaign for National Parks (CNP) recently released a report on the state of wildlife in our National Parks, emphasising their incredible potential for reviving nature in the context of challenges like climate change, and a growing public desire for 'rewilding'. CNP considers that getting people to realise the extent of the damage in our National Parks is the first challenge; many do not see that they are facing an unacceptable loss of nature. This is mostly due to a lack of high quality data on wildlife, and a perceived lack of change over long periods of time.

#### The case for action

Although there have been great successes in specific conservation projects, biodiversity trends across National Park in England are in decline. *Raising the bar: improving wildlife in our National Parks* highlights that 75% of Sites of Special Scientific Interest in English National Parks are in an 'unfavourable condition' (compared to 61% across the whole of England). Although these sites are predominately labelled as 'recovering', this can simply mean the land is covered by agri-environmental schemes, rather than that biodiversity is actually increasing.

Due to the huge variety of environments, species and activities within our National Parks there is not a 'one size fits all' solution to help wildlife thrive within them. Although management plans are in place across all the National Parks, the report suggests they often fail to confront biodiversity issues and commit themselves to making real change. If improving ecosystem function and the abundance of wildlife is to be achieved, management plans need to be more ambitious identifying opportunities to link up existing habitats and tackle wildlife crime, for instance

With most of our National Parks in private ownership, National Park Authorities have to achieve their wildlife goals within the confines of the land management practices put in place by landowners. Intensification and increasingly mechanised farming has led to losses of hedgerows and wildflower meadows, while the grazing practices that have helped shape the landscapes we love also have implications for habitats. Raising the bar is a timely reminder that farming is still the dominant industru in our National Parks, and that with the right funding and advice, giving land over to wildlife need not lead to the loss of livelihoods.

#### A great opportunity

As part of the 25 Year Environment Plan announced by Michael Gove in January, the government launched its Review of England's National Parks and Areas of Outstanding Natural Beauty in May. An independent panel will assess how these landscapes meet our needs in the 21st century, and consider the possibility of expanding the current network. It will discuss where improvements can be made, and how we can continue to support those communities that live and work within them

The Review means CNP's important report has a great opportunity to gain traction for its calls for a fundamentally new approach to nature conservation in National Parks - including government action to restore blanket peatlands and upland heaths. Their central recommendation is for a move away from intense protection and management of specific areas and species, and to instead focus on a landscape scale approach to habitat restoration that prioritises natural and ecological processes. As CNP chief executive Fiona Howie puts it: 'Achieving improvements will require partnership working, but it will also require vision ambition and leadership. If we can't do it in the most treasured landscapes in the country, where can we?'

#### Faye Morgan

CPRE Supporter Services Assistant

**Find out more:** Read the full report and find out more about the Campaign for National Parks at **www.cnp.org.uk** 



## With the revised NPPF due as Fieldwork went to press, we take a look at CPRE's reponses to two key questions in the consultation.

Do you agree with the changes to the sustainable development objectives and the presumption in favour of sustainable development?

No. The proposed changes do not sufficiently explain Government policy on sustainable development, or how it will be implemented through the planning system. The Government has stated that it is committed to the delivery of the United Nations Sustainable Development Goals (SDGs). Our view is that at least 8 of the 17 SDGs have a clear relevance to the UK planning system and the NPPF, in particular 11 (making cities and human settlements inclusive, safe, resilient and sustainable) and 13 (take urgent action to combat climate change and its impacts). The Office for National Statistics recently consulted (September 2017) on how to measure progress in achieving the SDGs.

We recommend that the final NPPF should refer to the SDGs and the United Nations New Urban Agenda, which is intended both to be the global standard for sustainable urban development and to provide guidance for achieving the SDGs in planning policy. The SDGs should guide the NPPF in terms of providing indicators for the performance of the policy, principally in relation to the rates of land use for development and prevention of urban sprawl, overall levels of affordable housing provision to meet social need, and levels of Government investment in infrastructure across England, which are currently heavily biased towards areas of high market demand.

Operation of the 'presumption in favour of sustainable development' (DNPPF 11) continues to fail to provide an appropriate strategic context for plan-making. No discouragement is given to councils with growth aspirations that exceed the unconstrained opportunities for growth in their areas. Growth, even where this is aspirational and goes beyond meeting local people's actual development needs, is therefore encouraged regardless of whether this will lead to harm to the policies of the NPPF that indicate growth should be restrained. CPRE contends that housing requirements should be reduced based on constraints to the supply of housing land, and recommends that the revised presumption should include references to the availability and provision of sufficient infrastructure (whether green infrastructure, transport, health, education or other community infrastructure) as a key requirement of both planning and permitting new development.

Do you agree with the proposed approach to employing minimum density standards where there is a shortage of land for meeting identified housing needs?

Yes. Increasing urban density is an important way to deliver new homes and avoid encroachment of the countryside - a key indicator under the UN Sustainable Development Goals. The carbon footprint per capita is much less in modern well-designed higher density development than low density development. High density creates an opportunity for eco-developments to lead the way in good design. For example, the Oxford suburb of Jericho has achieved high density development at the same time as being an incredibly attractive place to live. This could also help to make affordable housing more viable in areas of high land value. Average density of development is currently shockingly low and leads to unnecessary greenfield landtake. We therefore, support the idea that an uplift to densities of residential development should be sought, in line with considerations in DNPPF 122.

It is imperative, however, that a drive to higher density does not compromise living standards and the quality of design of neighbourhoods and groups of buildings; nor should it threaten valued local open spaces. There may be situations where lower density housing is more appropriate, particularly in more remote rural areas or where harm could be done to the setting of heritage buildings, conservation areas, or the openness of the Green Belt. However, there are few, if any, circumstances where a density of much less than 30 homes per hectare should be considered appropriate, and most historic village centres, even in protected landscapes, were built at significantly higher densities than these. DNPPF 123a currently places too much emphasis on the quantity of any type of house. This should be revised to make it clear that plans and policies to optimise the use of land in their area and meet the range of housing needs that have been identified.

Find out more: Read our reaction to the revised NPPF at www.cpre.org.uk and find our full NPPF response in the Resources section.

## Current issues

#### Beauty spot saved

A Lancashire beauty spot will stay green thanks to a campaign objecting to 60 new houses on agricultural land in the Borough of Pendle. An application to bulldoze rural farmland in Barnoldswick was unanimously refused at the Borough of Pendle's Planning Committee in June. The area around Greenberfield Locks next to the highest point of the Leeds Liverpool canal, is a true beauty spot, and local people are passionate about wanting it keep it that way. CPRE Lancashire wrote a letter to the Planning Committee after being contacted by concerned residents, stressing that 'there is concern that if this application is permitted, further houses would be encouraged on a speculative basis, in a way that is not in conformity with the emerging local plan document.' Pointing out the application was also contrary to national planning policies, CPRE Lancashire argued the development would harm open countryside, sacrifice farmland, and disregard the intrinsic character and beauty of the area.

Elsewhere in the county, the branch welcomed a call for Green Belt protection in the Inspector's Report on Burnley's Local Plan. CPRE Lancashire engaged with Burnley's plan team during the various stages of the Local Plan's progression, querying the assumptions used for the housing and employment projections, and calling for proposed sites to be saved from Green Belt release. Consequently, the Inspector's Report of July called for reduced housing and employment land requirements to ensure that it is justified by the most up to date evidence. Two proposed employment sites on Green Belt farmland have been removed from the Local Plan Site Allocations, including ten hectares at Burnley Bridge, and nine hectares at Shuttleworth Mead South.

#### National Infrastructure Assessment

CPRE welcomed the UK's first-ever National Infrastructure Assessment, published in July by the National Infrastructure Commission, and providing recommendations for delivering improvements to the country's infrastructure network up to 2050. The report highlighted that by switching to low-carbon and renewable sources of energy, as well as reducing car emissions by moving towards using more electric vehicles, we will make significant strides towards meeting climate change targets.

Daniel Carey-Dawes, Senior Infrastructure Campaigner at the Campaign to Protect Rural England, said: 'We welcome recommendations to prioritise investment in low cost renewable energy, so long as it is sensitive to our landscapes. Crucially, the government must engage fully with local communities to ensure we provide solutions that meet their needs. Infrastructure must be something done for communities, not to them.'

CPRE is also pleased to see the emphasis within the National Infrastructure Assessment that is placed on rural broadband, with a recommendation that the government 'must devise a National Broadband Plan by Spring 2019, to deliver full fibre connections across the whole of the country, including those in rural areas'. On design, the assessment calls on government to 'ensure that all Nationally Significant Infrastructure Projects have a board level design champion and use a design panel'. We also welcomed guidance that 'new national rules for recycling be introduced, with restrictions on the hardestto-recycle plastics, aimed at reducing the amount of plastics going to incinerators.'

## Standing up for 'Fracktured Communities'

PRE welcomed a June report from the Housing, Communities and Local Government Committee which urged the government to drop its plans to fast-track fracking and dismissed the government proposals to do so as 'hugely harmful'.

The Committee's report into planning guidance on fracking also warned the government against its proposed move to bring applications under the Nationally Significant Infrastructure Projects (NSIP) regime. If designated as NSIP, fracking proposals would go through a national planning process that would reduce local jurisdiction. Designating individual fracking applications as nationally significant infrastructure projects would again lead to forcing decisions from Whitehall despite local opposition. Committee chair Clive Betts MP, echoed CPRE's concerns in saying: 'Mineral Planning Authorities have the knowledge of their areas needed to judge the impacts of fracking, not Ministers sitting in Whitehall. The Government has failed to

provide any justification as to why fracking is a special case and should be included in the regime in contrast to general mineral applications.'

## Contradicting principles of localism

The report came after a May joint announcement from the Secretary of State for Business, Energy and Industrial Strategy, Greg Clark, and the Secretary of State for Housing, Communities and Local Government, James Brokenshire, setting out plans to streamline the planning process for fracking by treating exploratory drilling as Permitted Development. Classifying exploration in this way would remove the need for full planning permission, completely removing local councils' decisionmaking powers and ability to reflect their communities' wishes.

CPRE argued that Permitted Development is intended to be used to speed up planning decisions on very small developments – like conservatories or erecting a fence – not drilling for shale gas. We condemned the proposals as likely to diminish the abilities of communities to influence proposals in their area, undermine local democracy, and make getting planning permission for fracking exploration as easy as that for building a conservatory. So we were is deeply encouraged by the Housing, Communities and Local Government Committee report claims that 'moving decision-making on fracking planning applications to a

"CPRE's vice president Sir Andrew Motion called for new principles of sustainable development to protect communities from fracking."



Fast-tracking fracking will put locally valued landscapes across England under threat

national level contradicts the principles of localism and would likely exacerbate existing mistrust between communities and the fracking industry.'

#### Don't fast-track fracking

Plans to relax the planning process for some shale-related development, and reduce the ability of communities to have a say on major applications, were first suggested in the Conservatives' 2017 General Election manifesto. In response, we called for a total halt to fracking unless it could be clearly demonstrated it would reduce carbon emissions, avoid unacceptable harm to our landscapes and wider environment, and be subject to democratic planning. The Government's manifesto plans were swiftly dropped from the Queen's Speech, only to be resurrected in May's ministerial statement. But with public support for fracking at just 18%, CPRE's vice president Sir Andrew Motion recently called on the Government to set out 'new principles of genuinely "sustainable development" to 'protect communities from fracking'.

"Local councils have been representing local community concerns by continually rejecting fracking plans"

CPRE are campaigning against the government's proposals, and have launched a petition with 38 Degrees to get as many people as possible to show the government the scale of opposition. Almost 150,000 had signed up as we went to press, calling for Secretary of State for Business, Energy and Industrial Strategy, Greg Clark not to fast-track fracking.



Fracking could industrialise the countryside if communities are ignored

More specifically, we called on him to drop measures to treat exploratory drilling as permitted development and include fracking in the Nationally Significant Infrastructure Projects Regime. If fracking companies are effectively given the power to override the will of local people, who have fought relentlessly to halt fracking at every turn, the result could be see scores of new drilling sites appear in the English countryside - with iconic landscapes like the North York Moors, Sherwood Forest, and the Fylde Coast under immediate threat.

Recent research has revealed that to replace even 50% of our gas imports, one new well would have to be drilled every day for the next 15 years – that's 6,100 wells in total (almost 5,000 football pitches in area).

#### The threat to communities and landscapes

Applications for fracking have received thousands of objection letters, and a petition to stop fracking in Lancashire in 2015 received over 50,000 signatories. In the past few months, local councils have been representing these genuine concerns by continually rejecting fracking plans and holding up these objections at public inquiries. In the face of local opposition to fracking, the industry continues to push through applications using government-granted special treatment to determine applications at the national level, and challenge in court any decisions made against them.

Preston New Road in Lancashire is currently the only site expected to begin operations in the immediate future, but other sites are likely to become active over the coming months. Third Energy's site in Kirby Misperton, North Yorkshire, was tipped to be the first site for fracking this year until the company delayed operations to the autumn. Ineos, a major industry player, intends to place 10 new fracking applications in the setting of the North York Moors this year.

CPRE continues to argue that fracking should be stopped unless it can be clearly demonstrated that the following criteria are met: That it helps secure the radical reductions in carbon emissions required to comply with planning policy and meet legally binding climate change targets; that it does not lead to unacceptable cumulative harm, whether for particular landscapes or on the English countryside as a whole; and that it is carefully controlled by effective systems of regulation and democratic planning, which are adequately resourced at both local and national levels. However, we are further away than ever before in meeting these criteria.

Find out more: Sign our 38 Degrees petition and read more on our Fracktured Communities campaign at www.cpre.org.uk/ frackturedcommunities

## Current issues

**Bristol airport expansion** 

CPRE Avonside recently responded to the second consultation on the growth of Bristol Airport which is proposing a doubling of passenger numbers. Campaigners argued that an expanded airport would be a disaster, not just for the sub region's environment and transport infrastructure, but also for England's economy as a whole, encouraging more housing and transport infrastructure in the South of England, and negatively impacting on the balance of the UK economy. Bristol airport would become disproportionately large compared to other regional airports and its impact on the sensitive environment of North Somerset and the West of England, the Avon Green Belt and Mendips AONB would be entirely unacceptable.

The branch argued that local air quality and landscapes are already suffering, and that continued expansion at Bristol airport is unsustainable even if there are technological improvements. Their response pointed out that planes are disrupting the tranquillity of the North Somerset countryside and disturbing the lives of local people. They objected to proposals to release further areas of Green Belt to accommodate airport growth, pointing out this would create 'a magnet for big car parks, roads and sprawling housing and economic developments that eat into the surrounding countryside.' With an integrated transport network promised under the airport planning consent of 2011. The branch believes this work – including a transport interchange - needs to be delivered before development consent for any new scenario is given, and that the aiport must invest in this network itself without waiting for further public funding.

# MATTERoffact

#### Can green farming save England's butterflies?

PRE joined sixteen other nature charities in June, coordinated by Wildlife and Countryside Link and Greener UK, to highlight new government showing that butterfly populations in England have nose-dived by 27% on farmland and 58% in woodland since 1990.

Together, we are calling for urgent action in the Agriculture Bill to encourage radical change to farming and land management practices which are causing butterflies to disappear and widespread environmental damage. Butterfly populations fluctuate widely each year, but figures for 2017 showed little shift from 2016 – which was one of the worst years on record, with particularly bad weather for butterflies. The five worst years ever for butterfly populations have all been in the last decade. The campaigners are warning that this adds yet more weight to the evidence of decline in our natural world and shows the urgent need to prioritise environmental action in the forthcoming Agriculture Bill and a specific Environment Act.

Nature is vital to our own wellbeing and a countryside without butterflies is unthinkable. Restoring our environment is also in the interest of the farmers who rely on our struggling wildlife and other natural resources. Insect pollination is vital to 84% of our crops, worth £690 million each year, with bees being the most important pollinators. Without urgent intervention to change the industrialised agriculture system which is killing them off, British butterflies, bees and other insects will continue to vanish. As insects disappear so does our main source of crop pollination, natural pest control, and a huge source of food for wildlife.

## A catalogue of destruction

But butterflies are just one indicator of struggling biodiversity. Half our bumblebee species are in decline, three are now extinct, and seven have more than halved in the last 25 years. Two-thirds of moths and 71% of butterflies are in long term decline. More than half of UK species have suffered declines in recent years and almost one in six species (one in five mammals) are at risk of vanishing.

All this is not surprising given the assault on our habitats. Since only 1990, 60% of the English landscape has changed in ways which are 'inconsistent' with its traditional character, such as removing heathland, wildflower meadows. orchards and ponds. 50% of UK hedgerows have disappeared since 1947 as a result of changes in farmland management, most that remain are in 'poor condition'. Dependant wildlife has been severely affected by habitat loss with half of our hedgehog population having disappeared since 2000. Pesticides have become more toxic and the number of times crops are treated has soared - 55% of cereals

were treated in 2016 more than four times compared to 30% in 1990. Only 14% of rivers in England are classed as healthy, with the highest proportion (31%) of pressures causing poor water health attributed to agriculture and land management. Agriculture also accounts for 88% of ammonia emissions in the UK, contributing to wildlife loss and climate change, as well as damaging public health.

Soil, arguably our most precious resource, is being lost at around 10 times the rate it is created, with around 2.9 million tonnes of soil lost from fields in England and Wales every year. Soil degradation costs the economy around £1.2bn a year including by reducing output of food production, increasing flooding and reducing water quality. Ancient woodlands help hold our soil together, and support over 200 of our rarest and most threatened wildlife species, yet around half of our ancient woodlands have been lost in the past 90 years.

## Building on best practice

The decline in the environment is matched by falling farming profits, with total income from farming in England also having fallen sharply - more than 36% since its peak at almost £4 billion in 2013, to 2.53 billion in 2016. To demonstrate the need for a switch to nature friendly farming, and the appetite for this from farmers, the organisations held a farmers' market in Parliament in late June, involving over 100 MPs and Peers in addition "Nature is vital to our own wellbeing and a countryside without butterflies is unthinkable"

to a range of stakeholders. This event showcased nature friendly UK farming produce, explored the reasons why it is essential for the environment to thrive if farming is to do the same, and demonstrated that we can have a productive countryside which is also bursting with nature.

The Government announced ambitious plans in its Agriculture Command Paper, particularly on subsidy incentives for environmental improvements, but there are fears these plans could be watered down. Environment and animal welfare experts are calling on the Government to stick to its guns and outline ambitious and binding targets in the Agriculture Bill, backed up with funding and clear mechanisms to make them effective. We want to see the environment and animal welfare at the heart of publicfunded farming payments, effectively enforced by ensuring the new environment watchdog has the resources, expertise and independence to hold the Government and public authorities to account.

Find out more about this and other Wildlife and Countryside Link initiatives at www.wcl.org.uk/