



Campaign to Protect  
Rural England  
Standing up for your countryside

# FIELD WORK

Spring 2019

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## The future of our protected landscapes

**C**PRE has submitted a set of innovative recommendations to an independent review of National Parks and Areas of Outstanding Natural Beauty (AONB), on how to improve access to these designated landscapes. If implemented, the recommendations would give all children the opportunity to visit and learn about National Parks and AONBs as part of the national curriculum.

The review of England's current network of 34 AONBs and 10 National Parks is led by an expert panel chaired by journalist and writer Julian Glover; it marks 2019's 70th anniversary of the legislation which led to the creation of England's first National Parks - something CPRE was fundamental in shaping. The review aims to look at how these iconic landscapes can continue to benefit society while meeting our needs in the 21st century.

In our December submission, CPRE argued that access to nature can have a profoundly positive effect on our physical health and mental wellbeing. However, research from Natural England in 2015 shows that 12% of all children have no engagement with the natural world at all. CPRE warned that many of these children, particularly those from lower socio-economic backgrounds, Black, Asian and Minority Ethnic (BAME) communities and those in urban areas, are currently missing out on the benefits these beautiful places can bring due to lack of opportunity for them to access the countryside.

## Reconnecting people with nature

Currently, 93% of all visits to National Parks are made by car, yet less than half of all households in England have access to one. Poor public transport links makes access to protected landscapes near impossible for many people. CPRE therefore recommended building this access into school curriculums in order to increase the diversity of visitors and give more people opportunities to enjoy them. We are calling for schools without easy access to National Parks and AONBs to be prioritised for transport initiatives, and that that organisations should be supported to champion outreach to communities who have limited access to these places.

Emma Marrington, CPRE's senior rural policy campaigner, said: 'It is imperative that that everybody is able to enjoy these breathtaking places, and only by promoting affordable and accessible ways to explore them is this going to be possible for a large portion of society. By introducing access opportunities at an early age, by embedding it into the school curriculum, children from all walks of life will be given the chance to fall in love with our countryside. By experiencing first-hand, the health and wellbeing benefits that access to these landscapes can bring, we can reconnect people with nature. This review is a golden opportunity to help these magical landscapes thrive.'

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to protect it from the threats it  
faces, and to shape its future for  
the better.

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The future of our  
protected landscapes

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Alongside calls for improved access, CPRE advocates a more holistic approach to planning in AONBs to enable more sustainable levels of development. We'd like to see the introduction of a shared framework in AONBs where there are two or more local authorities, in order to deliver a consistent approach to land use decisions. We also called for AONBs to be statutory consultees on any significant planning application that would affect the AONB or its setting, and for effective monitoring of Management Plans in setting objectives, targets and delivering the desired outcomes.

Applying planning protections

Local planning authorities with AONBs in their area are usually required to meet the Government's housing targets in full, based on a standard method for calculating a 'local assessment of housing need', while National Park Authorities are free to adopt locally set targets which take environmental considerations into account. CPRE argues that any review of protected landscapes cannot ignore this disparity. In theory these landscapes have an equal level of planning protection but in practice AONBs are often the poor relation, subject to national and local pressures affecting individual local authorities. Although a statutory 'Duty of Regard' exists, requiring relevant authorities to take into account the statutory purposes of designated landscapes when making planning decisions, it is difficult to enforce and often ineffective in preventing inappropriate development in AONBs. We believe that this must be addressed, as National Parks and AONBs are of equal importance in the national value of their landscapes.

“AONBs are often the poor  
relation, subject to national  
and local pressures  
affecting individual local  
authorities”

As part of its submission, CPRE is also calling for any new housing development in National Parks and AONBs to focus on meeting identified need for genuinely affordable homes to support local communities. All planning authorities responsible for protected landscapes should encourage the use of the Rural Exception Site policy to facilitate the development of affordable homes to meet local need on sites which would not normally be granted residential planning permission.

“Strict protection lies at the  
heart of balancing long term  
sustainable development in  
National Parks and AONBs”

Affordable homes built in these areas should be subject to perpetuity requirements, to ensure that they are not sold on as open market housing in the future.

Local planning authorities should also be empowered to demand on-site affordable housing contributions on all sites, including developments of five homes or fewer. At present, planning policy prevents authorities in designated landscapes from seeking affordable housing contributions on sites of five homes or fewer. Yet many developments in National Parks and AONBs are on very small sites. The threshold thus places a severe constraint on affordable housing delivery in these areas. CPRE supports the ability of local authorities to levy up to 100% council tax on second homes, to ensure that second home owners are contributing to local services. However, the present review also offers an opportunity to consider how planning powers might be used to prevent communities in National Parks and AONBs from being saturated with second homes.

The major development test

CPRE believes it is very important that the Government is held to account for policy decisions taken at the national level, which then impact on National Parks and AONBs. We encourage the review to recommend that the National Infrastructure Commission (NIC) must not promote major infrastructure or other development in these nationally important landscapes.

There are occasions when National Park Authority decisions on major development may be unpopular. We contend that the National Planning Policy Framework (NPPF) major development test (para 172) should be tightened so that there are more rigorous backstops, such as automatic call-ins for controversial major development approved by National Park Authority's, particularly when this is against their own Planning Officers' advice or when statutory consultees have raised significant concerns.

One of the most significant forms of major development in National Parks is mineral extraction and para 172 of the revised NPPF states the presumption against such forms of development, subject to the 'major development test'. We drew this to the attention of the panel as mineral extraction is an enduring potential conflict with National Park purposes. Strict protection, through the rigorous operation of the major development test and other NPPF policies, lies at the heart of balancing long term sustainable development in National Parks and AONBs, without compromising socio-economic aspirations.

BREAKthrough

How our work is making a difference

Saving Kent's natural beauty

Planners' rejection of plans  
for a huge development  
in the Kent Downs Area of  
Outstanding Natural Beauty  
(AONB) has been warmly  
welcomed by CPRE Kent.

The proposals, put forward by developer Quinn Estates and landowner Highland Investment Company, targeted 300 acres of protected countryside at Highland Court Farm near Bridge. They entailed 175 holiday homes, a stadium for Canterbury City Football Club, six rugby pitches, a business park extension, 'innovation centre', food and drink units and a 'leisure hub'. A February meeting saw Canterbury City Council planning committee choose unanimously to decline planning permission for the scheme, which

had already been recommended for refusal in a planning officer's report listing 12 grounds as to why it should be turned down. The project had been opposed by CPRE Kent along with Natural England, Kent Wildlife Trust, Dover District Council, Barham Downs Action Group and several parish councils.

Hilary Newport, CPRE Kent director, said the decision was unquestionably the correct one: 'We're surprised that anyone could believe such an appalling scheme in an AONB might ever be considered acceptable. We're thrilled that Canterbury City Council's planning committee rejected the plans so decisively and so comprehensively.' Barrie Gore, chairman of CPRE Kent's Canterbury committee, said:

'It was interesting that one of the councillors had calculated that only 14 per cent of the site comprised sporting facilities – much of the rest was simply for high-end holiday homes.'

CPRE Kent had opposed the project since its announcement, with their president Richard Knox-Johnston appearing on live television in 2017 to stress the value and attractiveness of Highland Court Farm, and note that the North Downs Way, public footpaths, a cycle path and bridleway all passed through the site. He also questioned claims that the project would create 1,500 jobs, and highlighted the need to protect agricultural land - referring to Highland Court Farm's history of growing soft fruit.

Victory at Roseacre Wood

CPRE Lancashire was delighted  
to learn that the Communities  
Secretary James Brokenshire  
had concluded that Cuadrilla's  
appeal to allow fracking at  
Roseacre Wood should be  
dismissed, and planning  
permission refused.

CPRE had previously maintained an objection as highway safety impacts were insurmountable, recommending that the appeal against Lancashire County Council's refusal of planning consent be dismissed. Cuadrilla submitted three revised routes for traffic, but the Secretary of State's February decision said 'the proposed development would have a serious and very significant adverse impact on the safety of people using the public highway'. A department letter added that Mr Brokenshire 'considers that it is not possible to conclude that the demonstrable harm associated with that issue

would be eliminated or reduced to an acceptable level', and that the 'highway safety issues carry very substantial weight against the proposal'.

Local people were vociferously opposed to the application due to a range of negative impacts, including harm to rural character, hedgerows, tranquillity and local amenity. CPRE Lancashire will keep an eye on the situation to see if Caudrilla challenges the decision in the High Court, and would be guided by local people on how to respond in that event. Meanwhile, emerging expert evidence that shale gas exploration is incompatible with international targets on climate change is constantly evolving, and was added to by the report of the Intergovernmental Panel on Climate Change in October 2018. Fracking companies have recently argued that the traffic light system monitoring seismic events

caused by hydraulically fracturing geology at depth is too restrictive, and requested the Government relaxes the regulation.

CPRE Lancashire believes adequate regulation is imperative. Although Cuadrilla recently downplayed the effects of seismic events to that of a 'watermelon being dropped at the surface', CPRE Lancashire's Planning Manager Jackie Copley said: 'Small seismic events, even if small at the surface, can cause significant damage to the well casing, and ultimately greatly increase the risk associated with shale gas exploration, whatever the extraction technique. We therefore think it would be improper if the Government was to cut corners with shale gas regulation and planning. Public opinion and safety should continue to be a priority, as should the realities of climate change, which should not be ignored'.

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Current issues

**Manchester Green Belt spared**  
CPRE Lancashire is looking forward to seeing the ‘radical rewrite’ of the Greater Manchester Spatial Framework, based on the January announcement of Andy Burnham, Greater Manchester Mayor. The Mayor said: ‘We listened, reflected and today present a radical re-write as promised. The new framework is driven by a different, more interventionist approach: not developer-led but place-led. A radical re-write which doesn’t just protect more green space but supports radical new housing, industry, transport and environmental policies for Greater Manchester. It starts from the right place – a clearly-stated ‘brownfield-preference’ approach, directing development in the first instance to our urban sites with greater proximity to public transport. As a result of this, I can today confirm a major cut in the proposed use of Green Belt land from the original framework of over 50%.”

The Mayor’s speech was a vindication of the January 2017 joint-response to the draft framework by CPRE Lancashire, CPRE Cheshire and Friends of the Peak District, which said the developer-led plans would threaten greenfield land. The CPRE campaigners made a very strong case that it wasn’t necessary to release 4,900 hectares of Green Belt land, casting doubt on the very high growth assumed after an independent expert found the housing figures to be 30,000 too high. CPRE Lancashire will look at the Green Belt sites retained and question whether they are really necessary for development. They are also working with local communities to consider whether suitable brownfield sites are adequately recorded on brownfield registers, and will continue to campaign for the balanced growth of Manchester to achieve economic, social and environmental prosperity for all.

NEWSroundup

Keeping you on top of countryside developments

The state of brownfield in 2019

**CPRE’s new analysis of councils’ Brownfield Land Registers demonstrates the huge potential that building on derelict and vacant land has for the regeneration of towns and cities, as well as the provision of new homes.**  
The analysis highlights that there is space on suitable ‘brownfield land’ to accommodate more than one million new homes. Two-thirds of sites are ‘shovel ready’ and could make an immediate contribution to meeting housing need, as they have been confirmed as being deliverable within five years. As well as providing an opportunity to deliver the homes we need now, CPRE’s research highlights the potential for brownfield land to continue providing a steady pipeline of housing, as more than 120,000 of the potential new homes have been added

to the registers in the past year alone.  
Despite this demonstrable success of Brownfield Land Registers, CPRE fears that the definition of ‘previously developed land’ given in the registers’ regulations means that a large number of sites are currently being missed, and the full potential of the registers to bring forward as much suitable brownfield land for housing as possible is currently being unfulfilled. The requirement in the regulations that land should be ‘available for residential development’ and the definition of that term in article 4(2) may result in missing opportunities to make better use of existing developed sites. For example, supermarkets and their car parks could be converted to provide homes whilst maintaining existing uses.  
Many areas across England with high housing need

also have a large amount of brownfield land ready for redevelopment. London, Manchester, Birmingham, Leeds and Sheffield have identified land available for regeneration that would provide almost half a million homes. In order to make best use of suitable brownfield land, CPRE is urging the government to introduce a genuine ‘brownfield first’ policy, which ensures that suitable previously developed or under-used land is prioritised for redevelopment over green spaces and countryside. Clearer definitions and guidelines must be given so that the registers act as true pipeline, identifying all possible brownfield sites and recording their suitability for uses other than housing, including uses that protect the biodiversity or heritage value of sites where applicable.

Defending an 'irreplaceable treasure'

**CPRE North Yorkshire has been monitoring plans for up to 516 residential dwellings on a mixed use development immediately adjacent to the Askham Bog Site of Special Scientific Interest (SSSI).**  
The application site comprises 40 hectares of York Green Belt, and CPRE North Yorkshire has objected to this proposal while supporting the campaign of the Yorkshire Wildlife Trust to maintain the biodiversity of this area. The objection argued the development of the proposed site would result in the loss of agricultural land - 23 ha of which is categorised as the ‘Best and Most Versatile’ - which is important to maintaining the setting of the historic city and the SSSI. Allowing such large-scale development would, in the opinion of the CPRE campaigners, result in

unavoidable stress on the SSSI from vehicular movements, noise and air pollution, and litter.  
The campaign received national press attention in February when Sir David Attenborough - who described Askham Bog as an ‘irreplaceable treasure’ in 2016 - told *The Times* of his determination to save it: ‘It’s a marvellous open space of unspoilt countryside and it lifts the soul to visit it. From a botanical point of view, it is has a lot of rare plants that occur in very few other places. It would be a real tragedy if it was lost. It represents a botanical and landscape history of Britain in a unique way, in the way that York Minster represents the architectural history and social history. If you were talking about knocking down York Minister everybody would be appalled.’

*The Times* reported that CPRE had accused developers Barwood Land of seeking to exploit the absence of an agreed local plan for where to build new housing. Rebecca Pullinger, CPRE’s national planning campaigner, said: “If approved [the Barwood plan] will act as a beacon to speculative applications by developers exploiting the absence of an agreed, up-to-date plan.’ The report noted the Wildlife Trust’s opinion that the bog has a larger variety of wildlife than any other site in the county, but is at risk of drying out if the estate is built. With the nature reserve already bounded on three sides by a road, railway line and golf course, the Trust shares CPRE’s fears that the housing will further reduce its links to open countryside.

Threat to London’s Green Belt increases

**Five out of every six local authorities in Britain’s biggest Green Belt are planning to build on the supposedly protected land, says a new report by the London Green Belt Council (LGBC), an alliance of 100 organisations including eight CPRE groups.**  
In all, 202,700 new dwellings have been proposed for London’s Green Belt, a dramatic increase from 123,500 just two years ago. This poses the greatest ever threat to the green girdle around the capital, which has so far prevented it from sprawling out to cover much of the home counties. Yet there is enough previously developed brownfield land, in the area to accommodate all these homes and more. The report also finds that, contrary to claims by developers, building in the Green Belt does virtually nothing to address the crisis

of affordability of housing, especially for young people, in the South East – affordable housing is likely to provide less than 10 per cent of the new dwellings.  
The report, *Safe Under Us?* - *Two Years On* represents the biggest survey yet carried out by the LGBC and is based on research by eight South Eastern county CPREs. It found that 55 out of 66 Local Planning Authorities (LPAs) with land in the London Metropolitan Green Belt are now proposing to allocate some of it for development. It also found that 15 of the LPAs (23% of the total) permitted 25 per cent or more of new housing to be built in the Green Belt between 2013 and 2017. In four - Epping, South Bucks, Tandridge and Rochford district councils - it was over 35 per cent.  
In all, the survey found 519 London Green Belt sites were under threat by July 2018,

compared to 403 a year before and 203 in July 2016, when the LGBC published its first ‘*Safe Under Us?*’ report. Yet the survey also shows that there are 4,934 hectares of brownfield land is available in the Local Planning Authorities boundaries which could accommodate a minimum of 260,383 new homes, more than enough than is needed for the 202,700 proposed for the Green Belt. The London Green Belt Council calls on government at all levels to protect the London Green Belt, a positive and important resource for those living in and around London, now and in the future. The report recommends a focus on brownfield land and genuine housing need, and restrictions on the ability of councils to de-designate Green Belt land.  
**Find out more at:** [http://londongreenbeltcouncil.org.uk/threats\\_map/](http://londongreenbeltcouncil.org.uk/threats_map/)

dates of note

**Oatcake morning at Canalside Farm**  
Enjoy a delicious oatcake and raise funds to protect Staffordshire’s countryside. Join CPRE Staffordshire at their stall at Canalside Farm cafe, which is hosting the World’s Biggest Oatcake Morning to mark Staffordshire Day.  
*1 May, 9am-5pm. Canalside Farm, Mill Lane, Great Haywood, Staffordshire, ST18 0RQ.*

**From Castle to Cold War - reading the historic landscape**  
A day-school examining the topography, settlement patterns, field systems and buildings which give Suffolk its historic landscape character. Organised by Suffolk Preservation Society and lead by Dr. Richard Hoggett FSA MCiFA. £35 per person. Contact Linda Cockburn, Office Manager on [sps@suffolksociety.org](mailto:sps@suffolksociety.org) or 01787 247179 to book your place.  
*Friday 10 May 2019. 10am - 4pm. Orford Town Hall, Market Hill, IP12 2NZ*

**Concert of choral music through the ages**  
Presented by the hugely popular ‘New Chamber Choir’ conducted by Paul Hudson. All proceeds in aid of Friends of the Peak District. Admission: £7.50 (concessions: £6.00). Find out more and book at [www.friendsofthepeak.org.uk/product/choral-concert-2019/](http://www.friendsofthepeak.org.uk/product/choral-concert-2019/)  
*Saturday 13th July at 7.30pm. St Michael and All Angels’ Church, Hathersage*

**CPRE Norfolk’s AESTIVAL**  
CPRE Norfolk’s joint fundraising fair with the Norfolk Historic Buildings Trust showcasing the best of Norfolk and celebrating our beautiful natural and built environment in the grounds of the beautiful Raveningham Estate. Find out more and book at [www.cprenorfolk.org.uk/summer-fair/summer-fair-2019/](http://www.cprenorfolk.org.uk/summer-fair/summer-fair-2019/)  
*Sunday 28th July, Raveningham Estate, Norfolk*



## Current issues

### Advising on Shropshire's heritage

Carole Ryan-Ridout has taken up the role of Heritage Adviser for CPRE Shropshire having been Head of Historic Environment at the former Shropshire County Council for many years. Using that detailed knowledge of the county, the role involves responding to concerned members of the public and parish councils, who bring those aspects of listed building and conservation area consent applications to the attention of CPRE Shropshire. A common issue in the county is the redevelopment of public houses, including the Cross Keys at Kinnerley – a medieval hall (c.1400) with connections to the Knights Templar. Thanks to the vigilance of the late Mike Bullen of CPRE Oswestry, now succeeded by his widow Hilary, this hostelry - and surrounding village green - has been saved from development through designation the conservation area.

Barn conversions remain popular, and concerned residents contacted CPRE regarding a group of farm buildings near Newcastle-on-Clyun – in such cases their heritage adviser will work with the Shropshire Council's conservation officer to ensure that valuable features are preserved. Members of CPRE Shropshire are welcome to contact the heritage adviser concerning buildings in a poor state of repair, applications for listed building or conservation area consent that is causing concern, or work that may not accord with local authority consents.

CPRE Shropshire highlighted the importance of conserving historic character in its recent response to the council's local plan review. Read their full submission and the latest news from the group at [www.cpreshropshire.org.uk](http://www.cpreshropshire.org.uk)

# letter from the field

Words from local campaigners

## With the prospect of the Lower Thames Crossing between Kent and Essex threatening swathes of countryside on both sides of the river, Alex Hills, chairman of Dartford and Gravesham CPRE, says we can't rely on the car forever

### Dear reader,

Since the 1950s, successive governments have pursued a transport policy built around the car as the main form of transport, on the misguided basis that building new roads reduces congestion. In fact, CPRE's *End of the Road* report showed that building new roads increases congestion and proves more environmentally damaging than suggested, while failing to provide the claimed economic benefits.

Locally, we have seen the Dartford tunnel built, which would apparently end congestion, then another tunnel and then a bridge – and now a new, very damaging, crossing that would increase both congestion and air pollution in the area.

CPRE is not anti-car – far from it – but to have a sustainable green transport system that does not destroy people's health there needs to be more investment in other forms of transport. Gravesend is a hostile environment for cyclists, with existing cycle routes like the ones on the Wrotham and Rochester roads being dangerous for them. In the town centre, cyclists are banned while in other places there are signs saying 'Responsible cyclists welcome'.

The bus service in our rural areas is appalling, while train

services are struggling to cope with demand. Green travel plans are not just about infrastructure – they are also about ensuring that trains, trams and buses connect properly so people do not have excessively long waits. They are also about ensuring our transport systems are more disabled- and senior citizen-friendly.

There is some good work being done in this area, with cycling plans being developed for Dartford town centre, Stone Parish Council developing its own cycling plan and Ebbsfleet garden city working extremely hard to develop a green travel plan, while the proposed KenEx tram line would help tackle congestion in the area, reducing traffic at the Dartford crossings by 10 per cent.

Even with other walking and cycling projects, all these projects comprise just a small amount of what is needed. Rural areas cannot be accessed by non-road transport. For example, there is no pedestrian or cycle path between Istead Rise and Meopham. The goal for district councils, the county council and the government should be to make the car the transport option of last resort.

To get people to use public transport, it needs to be reliable, affordable and able to reach destinations in reasonable time.

Currently, it takes two hours to get from Gravesend to Maidstone by bus and 25 minutes by car – given the choice, no one is going to choose the bus. To get more journeys completed by walking and cycling, these options need to be made safer, with separate walking and cycling paths away from roads.

It is time we demanded a better transport system. By continuing to build poorly planned new roads, the government is increasing the air pollution that kills 40,000 to 50,000 people a year. There has been much talk about zero-emission cars, but electric cars produce pollution through their tyres; the manufacture and disposal of components (especially the battery, which uses rare metals that are open-cast-mined); building the infrastructure required to support them; and the production of the electricity to charge the batteries.

We, of course, are part of the problem and also part of the solution. We urgently need an integrated national transport plan that is genuinely sustainable, but in the meantime we can all play our part by making fewer unnecessary car journeys and walking and cycling more.

# GOODideas

Learning from each other

## Norfolk's latest award winners

**Last November saw a packed ceremony at The Hostry, Norwich Cathedral to announce the latest winners of the CPRE Norfolk Awards. The prestigious Green Build Award went to the Goldsmith Street Development by Norwich City Council – a brownfield development in Norwich of 105 dwellings for social rent, built to high PassivHaus and design standards, and the largest PassivHaus scheme for social rent in the country. The main site of 1.2 hectares was previously occupied by sheltered housing dwellings, a county care home and industrial units.**

The new development recreates the terraced streets of the area that were removed in post war clearance, achieving approximately 80 dwellings per hectare despite most of the site being two storeys. The council chose a Passivhaus design for a number of factors: the reduced

energy bills and better air quality benefits tenants; the sustainable, low carbon construction benefited the environment; the build created opportunities for local workers, contractors and suppliers.

In the Thriving Countryside category, the North Walsham Conservation Group of local volunteers were rewarded for unearthing Honing Railway Station from under years' of debris, to make it part of Weavers' Way footpath. A wide range of features have been discovered, from 600 million year old cobblestones to a well with a motorbike in it and an antique toilet! Volunteers have been working hard to reveal the fascinating remains of the old station buildings, signal box and cattle pens. Artwork by local schools is being installed on site, along with an interpretation trail showing people where to find its historic features.

The team have also brought back to life delicate wildflower

habitats at Knapton and Felmingham railway lines, and completely transformed a large area into a beautiful habitat-rich resource for education, visits and relaxation. Over 50 local people, from teenagers to pensioners, have worked side by side on the project, sharing knowledge and experiences, and learning a lot about their local landscape.

CPRE Norfolk director Helen Leith said: 'All our short-listed projects are worthy winners and the awards are our way of saying thank you and well done to so many people who work so hard to make Norfolk a beautiful and special place to live. We have seen some really wonderful things happening out there and the dedication, enthusiasm and expertise of so many volunteers and professionals is very encouraging and exciting.'

**Find out more** about all the shortlisted projects at [www.cprenorfolk.org.uk/2018/11/](http://www.cprenorfolk.org.uk/2018/11/)

## A masterplan for Enfield

**CPRE London is working to promote brownfield sites as a sustainable alternative to building on the Green Belt. February saw them release new analysis showing the potential of brownfield and high-density 'masterplanning' as alternatives to Green Belt development in Enfield. Working with local groups Enfield RoadWatch and The Enfield Society, CPRE London published *Space to Build, Enfield as evidence to support their response to Enfield Council's Local Plan consultation*.**

Conducting a detailed survey of the entire Borough of Enfield, ward by ward, the campaigners established a list of sites which could provide space to build,

but which currently make poor use of space - from some very large sites to hundreds of 'micro' sites. The exercise identified sites that could provide space for 37,000 new homes, compared to just 2,170 homes identified on Enfield Council's most recently published brownfield register in December 2017.

Alice Roberts of CPRE London said: "The type of low-density housing which is typical of Green Belt developments will contribute little towards the borough's housing target. Building on Enfield's Green Belt would mean giving up large swathes of valuable green land for very few new homes. And those will predominantly be expensive homes. There

are much better options. Large 'opportunity' sites, like the Southbury area, can and should be 'masterplanned' for high quality, high density (though not high rise) housing developments which are walkable and where space is used for housing rather than lots car parking, as happens with low-density Green Belt development. This type of high density housing is more affordable for young people and people on lower incomes – people who are also more likely to rely on public transport and are less able to afford a car. It can also include office space, schools, shops – everything people need."

**Find out more** at [www.cprelondon.org.uk/projects](http://www.cprelondon.org.uk/projects)

### Affordable homes for Chichester

With a growing body of evidence highlighting a national shortage of affordable homes, CPRE Sussex has been promoting the commitment of Chichester Council to its goal of providing homes for the people who really need them – particularly in rural villages. During Rural Housing Week last summer, the council held a special forum for local communities wanting to build their own affordable homes. Then, in November, the Council voted to provide a £165,000 grant to enable Radian Housing Association to build 8 much needed affordable homes in the villages of Chidham and Hambrook. Without this money the scheme could not have gone ahead. In total, 165 affordable homes were built in Chichester District last year, and 66 of these were rural homes for local people. The council is currently consulting on a new Local Plan for the area, including Policy 'S6: Affordable Housing' which requires that 30% of new housing must be affordable. It also allows Neighbourhood Plans to set a higher target if local need and viability can be evidenced.

CPRE Sussex has formed a new group in Chichester to look at the area's Local Plan. CPRE Chichester's response to the Local Plan Review reflected that the district is faced with increased housing targets despite having over 70% designated land, including the Chichester Harbour Area of Outstanding Natural Beauty and protected habitats including Sites of Special Scientific Interest. CPRE volunteers raised concerns over the lack of consideration of brownfield options, light pollution, health and wellbeing impacts, inadequate roads and second homes.

Contact [info@cpresussex.org.uk](mailto:info@cpresussex.org.uk) if you are interested in joining the new group.



## Towards a Hampshire Green Belt

December saw CPRE Hampshire's campaign for a South Hampshire Green Belt Green Belt (backed by a 13,500-strong petition) win support from council leaders on the Partnership for Urban South Hampshire (PUSH) committee. 11 councils in the south Hampshire region – including Hampshire, Portsmouth, Hampshire, Havant, and Test Valley – agreed that a Green Belt must be a key part of their ongoing plans for sustainable development in the county.

CPRE Hampshire chair Dee Haas said: 'We are thrilled that so many council leaders have prioritised the health and well-being of local people by choosing to bring us a step closer to a Green Belt in South Hampshire. Not only will this protect our countryside, but by establishing a Green Belt, the council would be able to concentrate on developing a more strategic, sustainable, forward thinking approach to planning to meet local housing need.'

The case for the Green Belt was strengthened in January, when new CPRE Hampshire research found that the current local and strategic gaps have limited value in protecting the area's countryside. Campaigners were delighted that Chair of PUSH and Leader of Fareham Borough Council Cllr Sean Woodward has responded to their report. The Councillor has backed the idea of a South Hampshire Green Belt, saying: 'I would love to have a Green Belt in Hampshire and I agree that Strategic Gaps don't work. I would love to see this resolved in the next one to two years and it is something that we are working towards at the moment.'

**Find out more:** Read more on the campaign at [www.cprehampshire.org.uk/campaigns/green-belt-for-south-hampshire](http://www.cprehampshire.org.uk/campaigns/green-belt-for-south-hampshire)

# stepbystep

## Guide to good campaigning

## People-led placemaking

**40 years on from my first contact with geography and planning, after 30 years in public planning service, 15 years of urban design, and now moving into the third sector with CPRE, I'm hoping for a paradigm shift which will help us to stop building CRAP developments - Car-centric (engineering little choice but a sedentary lifestyle), Remote (from services, public transport, the context of place), Anonymous (lacking personality, character or distinctiveness), and Profligate (wasting energy and water).**

Our landscapes of CRAP include sprawling low density, poorly connected housing, consuming greenfields. Soulless retail and leisure 'shedlands', and mean-spirited office to residential 'permitted development' conversions for desperate renters. Computer generated boxes in cramped schemes that fail to meet any needs of the people that live there. All a result of weak planning, leading to towns, neighbourhoods and environments that decline by social and economic neglect.

Over the past forty years, local government's historical and primary role in providing housing has been run down and market led development promoted as the answer to our needs. Based on demographic growth, 5-year housing land supply calculations mean the weight given to bald numbers in planning to justify development has increasingly taken over.

Large volume housebuilders undertake viability assessments based on forecast profits that require housing to be sold at expected high prices. When house

prices start to slip back, inflated land prices leave a narrow profit margin for the developer, so that negotiated planning obligations – pledging affordable housing, open space and transport provision – are often sacrificed to maintain that margin.

These scenarios don't provide the quality housing or sustainable places we need. They fail to enable mixed uses and healthier active lifestyles. They fail to prioritise brownfield land and regeneration. They create negative attitudes to development, and NIMBYs. But with the right planning model, we can become a nation of QUIMBYs – 'Quality in my back yard'.

So how do we stop the CRAP? I propose these ideas for starters:

### 1 Prioritise housing need

As the Raysnford Review 2018 has proposed, local authorities should have a new duty to house. Everyone has a right to a decent home. A first priority and performance target of local government should be to find housing for all those on current waiting lists, to meet the greatest need.

### 2 Champion inclusive development principles

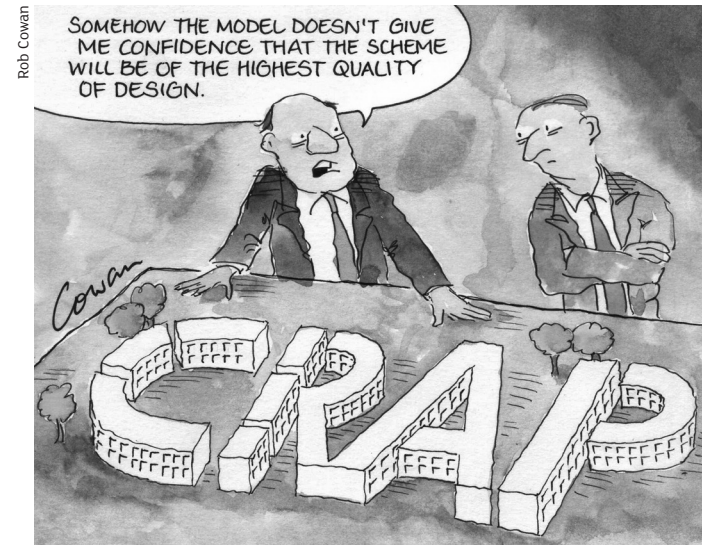
Development could be the agent for really good things to happen, if we moved away from outline planning permissions to a system of Statements of Development Principles. Significant development would then start with an inclusive conversation with local stakeholders, residents, citizen groups engaging as equals with planners, designers and landowners.

75% of a Barnet estate actually voted to support a scheme doubling its density because it offered them better quality homes and input into the design process. St Ann's in Haringey has a local community land trust embracing higher density as part of a far more socially relevant design which promotes green spaces, health and wellbeing.

### 3 Bring land under public management

As we reinvigorate the citizen's role in partnership with designers and placemakers, councils need to recover a leading role in land assembly, creative planning and housing; and central government needs to actively enable this. The best outcomes are often those with a significant element of public land, considered by well-resourced multi-skilled design teams, with broader place-making objectives and an active citizen input. We need to learn from these. Ideas are allowed time to evolve and then the quality of the scheme is maintained by long term governance and perhaps a public land holding.

We must have a general presumption that significant developable land comes into public land management, to ensure the majority of the uplift in land value is returned to the community and can facilitate the best design outcomes. And we must ensure local authority housing companies have a broad brief to enhance place, meet needs, engage with communities and are not just a vehicle for generating profit.



**Weak planning has given us computer generated boxes in cramped schemes that fail to meet the needs of the people who live there, leading to social and economic neglect.**

### 4 Identify suitable sites

We need to give residents and citizens new rights to highlight developable property and land for the common benefit of their areas. Why should areas be blighted by nearby eyesores for years? Local authorities can then act accordingly by making a compulsory purchase (at a 20% uplift of existing use values recommended by Shelter's *Civic Housebuilding*) then developing site or area frameworks or Statements of Development Principles.

### 5 Use a competitive design process

Design teams and builders, free from the burden of finding land, would be able to invest in design skills and compete for the chance to build on the basis of delivering creative, delightful, slightly chaotic, fun, distinctive and sustainable schemes that we need to make the norm. This is the best role for dynamic market forces within the planning process. Design Review Panels and Citizens Juries can input and feedback on the design options. These all proceed and inform the formal planning application process.

### 6 Invest in active travel

The health, time, economic and social benefits of a rapid investment in walking, cycling and other active travel options make it a 'no brainer' in terms of value for money. Local authorities to lead on comprehensive active travel plans that measure and promote future reductions of vehicle traffic with realistic but ambitious targets for modal shift.

### 7 Have a national plan

Nationally, we need to have a strategic plan with a strong element of regional devolution of decision-making powers. Spreading the national wealth to the left behind places that cry out for development will also ease the negative effects of overdevelopment on the southeast countryside.

A new planning model will be more positive about mixed uses, active travel and increased density. 'Garden City' principles have come to mean suburbs, but in fact originally envisaged more compact communities with shared open space of up to 80 dwellings per hectare. Context is everything, but with good design and a

rich mix of uses, economies are more resilient and active travel patterns are realised. For all its architectural critics, Poundbury in Dorset is now demonstrating the benefit of mixed-use.

Making the planning system respond to local needs and reinvigorating local authorities could stabilise local property markets and encourage downsizing, freeing up the record amounts of underused space within the housing stock. 6.8m householders over 60 would like to downsize. Local authorities measured on their success with waiting lists could take on some of the 200,000 empty and uninhabitable homes and bring forward schemes for the 400,000 potential homes above High Street upper floors. They could then re-plan some of those wasteful 'shedlands' that have lost out to online shopping - providing homes which are energy efficient, affordable, convenient and not car dependent.

Of course, all of this means enabling local authorities to become creative leaders, and more active and skilled in matters of land assembly, design management and community engagement (via workshops, charettes, design by enquiry etc). They need to be resourced with in-house urban design teams and community engagement skills. This will take time and funding but I'm sure it represents a high value investment. It needs enough politicians nationally to understand the agenda for change, and the principal changes that will make a difference on delivering for real needs. I would urge caution with politicians playing the numbers game with housing.

If we get the principles right then I'm sure we can steadily make the difference from the bottom up. Meeting housing needs, protecting our countryside and letting communities take back control. No more **CRAP**. We're all **QUIMBYs** now!

**Tim Hagyard**  
Planning Manager and  
Urban Designer  
**CPRE Hertfordshire**

## Current issues

### New hope for derelict landscape

CPRE South Yorkshire is at the forefront of a new initiative to find a future for the derelict Hepworth's site in the Loxley Valley. They're working with Sheffield City Council and the site's new owners, Patrick Properties, to engage the local community in preparing planning proposals for the huge site, which has lain dormant since the 1990s.

The process began with a small workshop at Langland's Garden Centre on 13th December 2018, with an invited audience of community groups, environmental groups, Parish councillors and local businesses. This will pave the way for full public engagement in 2019. Participants at the workshop raised a wide range of issues, including the need to enhance the woodland character of the valley and manage flood risk and traffic growth.

Hepworth's vacated the site in the early 1990s, leaving huge buildings that are now unsafe and falling down. But there are still a couple of small businesses and some cottages in use, as well as an attractive millpond, extensive woodland that is rich in wildlife, and a bowling club. Bovis Homes drew up proposals for a housing development in 2005, but a planning application was never submitted. CPRE was deeply involved in challenging the Bovis proposals, putting forward a manifesto for the site which called for significant 'greening' of the site, exemplary development and full community participation. Securing a good outcome for the site remains one of CPRE South Yorkshire's top priorities, and they will work with Patrick Properties, who have commissioned leading planning and design consultant URBED to help draw up proposals that the community can support.



### Northants community heroes

CPRE Northamptonshire showcased efforts to enhance green spaces and raise awareness in their 2018 Litter Hero Awards. The first prize of £500 went to the always impressive litter team in Blisworth – a commendable ad hoc group of volunteers from the village primary school, the parish council and their year-round squad of citizen litterpickers. Litter Heroes has become a major part of village life, with extremely good participation from the primary school. Kilsby C of E Primary School, in conjunction with the Kilsby Parish Council, were worthy winners of the £150 special prize for the best entry from a school or youth group team - mounting a full campaign in the village to raise awareness of the issue amongst village children.

CPRE Northamptonshire is also the new sponsor of the Northamptonshire Village Awards (previously known as the Best Village Competition) for 2019 and 2020 organised by ACRE. The awards recognise the importance of community involvement, as well as the care for the natural and built environment, in creating attractive villages and vibrant communities. The judges will be looking for villages that can demonstrate enterprise, initiative and community spirit in how the village cares for all its inhabitants and how the village is looked after, as well as the involvement of local businesses and the welcome given to visitors.

The Litter Heroes competition will now be incorporated within the Village Awards. Thanks to the support of our Lord Lieutenant as President of both Northamptonshire ACRE and CPRE, will be known as the 'David Laing Litter Awards', and will offer more than £2,000 in prize money this summer.

**Find out more** about the awards at [www.cprenorthants.org.uk/](http://www.cprenorthants.org.uk/)

# PARISHbeat

Effective solutions for your parish

## Debating housing in Hampshire

**With the average working person in Hampshire villages needing a 150% pay rise in order to buy a local home, CPRE Hampshire held an important Rural Affordable Housing Conference in November, highlighting issues facing parishes who are trying to meet local need.**

Following the conference, CPRE Hampshire is asking businesses or families with land to consider working with housing associations and community charities to provide affordable land for affordable homes. Chairman Dee Haas said: 'One of the main stumbling blocks to providing homes for people in rural areas is the high price of land. At the conference, we discussed the idea of altruistic landowners helping communities where a need has

been established, by contributing land either at no cost or low cost for small affordable housing schemes. We would ask any landowners out there who are keen to support their local community to consider providing land at an affordable price for parish councils, housing associations and community groups looking to build affordable homes to meet the needs of local people.'

CPRE Hampshire campaigners and local people were able to raise these issues with Housing Minister and North West Hampshire MP Kit Malthouse at their panel discussion in February. The event, held in Mr Malthouse's constituency, also addressed housing numbers, environmental impacts and the Government's housing strategy of 'More, Better, Faster' and its implications for the Hampshire countryside.

The Minister agreed we need to adopt a more joined up approach to Local Plans and Neighbourhood Plans, including planning for 15 years ahead rather than five, with a focus on sustainable public transport and infrastructure. He also emphasised the need for developers to think more in terms of building communities, rather than just houses. CPRE's national head of planning, Matt Thomson, told the minister that 'it would be great if government could come down like a ton of bricks on local authorities that fail to uphold NPPF policies on preventing sprawl or protecting landscapes in the same way that they do on those that fail to plan for housing need - especially when the housing that gets built in Green Belts and in the countryside so patently fails to address the root causes of housing crisis.'

## A special offer from the TCV Community Network

TCV (previously the British Trust for Conservation Volunteers) has been at the forefront of environmental volunteering since it was formed as the Conservation Corps in 1959.

As part of TCV's 60th anniversary celebrations (and thanks to funding from players of People's Postcode Lottery) they are delighted to offer CPRE Members the opportunity to join TCV's Community Network free of charge for one year.

TCV's Community Network supports more than 900 groups across the UK who are passionate about protecting their local environment or creating new green spaces to reflect their community's unique needs. TCV's experience and expertise can turn your ideas for practical conservation projects into reality.

This Membership, which usually costs £38 per year, is open to all conservation groups, clubs, schools, community organisations, wildlife groups, Parish Councils and organisations who are working to create a better natural environment for their local community.

Membership benefits include: an online Community Network website - exclusive to TCV Members - providing lots of information and practical support including conservation guidance based on TCV's 60 years of experience <https://www.tcv.org.uk/community-join-community-network>; a range of specially negotiated discounts from TCV's suppliers of tools, trees, seeds, equipment; access to TCV's new e-learning range of renowned practical

conservation handbooks at a half price discounted rate <https://www.conservationhandbooks.com/>; optional free listing of your contact details and web address on TCV's website to help promote your group's activities; and a free quarterly newsletter full of information about community groups like you who share their stories plus news, offers and much more.

If you would like to find out more and take this opportunity to join TCV's Community Network please complete the application form on TCV's website <https://www.tcv.org.uk/community-join-community-network> and return it to Jo Bushby (TCV's Community Network Administrator) Sedum House Mallard Way, Doncaster DN4 8DB or email to [j.bushby@tcv.org.uk](mailto:j.bushby@tcv.org.uk)

# CAMPAIGNER

## In it for the long haul



Kevin FitzGerald (centre) standing up for Hertfordshire's countryside

**CPRE Hertfordshire honorary director Kevin FitzGerald shares his experience of 35 years campaigning for the countryside.**

"Good land-use planning is the unsung hero of environmental protection, and volunteering for CPRE has allowed me to help communities use the planning system to defend their local green spaces and wildlife habitats.

The CPRE Hertfordshire office is so inundated with cases that we can't fight every battle ourselves – but we can give people the tools and support to stand up for their countryside. I prefer to help set up independent local action groups because combining local knowledge and passion with our knowhow can be extremely effective. It's rewarding to campaign alongside like-minded people – even more so when those campaigns are successful and we safeguard our green fields and villages from unnecessary or inappropriate development.

I've been called 'the face of CPRE Herts' because I'm always willing to use a site visit with the media to help showcase a threatened landscape and get our message across. I was touched recently when branch colleagues presented me with a compilation of some of these 'photoshoots' as an 80th birthday present. I was surprised to see how many I'd done over the years - in the heat of the moment I tend to forget the cameras are there – and proud to note that most of the backdrops are still there, in all their unspoilt glory. Having a media profile is so important to any campaign – not only does it help inform and drum up support from local residents, but it means local councillors and MPs are more likely to take an interest. A good local story can also become a national 'case study', and I've often been contacted by national journalists looking for a Green Belt story near London.

Developers love to categorise Green Belt land as 'scruffy', and thus expendable, even though Green Belt is designated because of where it is, not what it looks like. Still, I may be biased, but I believe Hertfordshire's Green Belt is genuinely beautiful – and our fundraising calendars prove that in spades. Ultimately, it's this beauty that got me involved with CPRE in the first place – I wanted to make sure that my children and generations to come could enjoy it as much as I have.

Of course, the next generation also need homes, and CPRE has identified enough previously developed land to provide over a million of them. But it can

be incredibly frustrating when decision-makers can't see the sustainable solutions. I remain optimistic, however, that the growing public desire for better planning will filter through. The average person is certainly better informed about environmental and planning issues than when I started volunteering 35 years ago.

My own interest in countryside protection first came about when, as a junior civil servant in the 1960s, I worked for the National Parks Commission under Harold Abrahams - the 1924 Olympic 100m champion immortalised in *Chariots of Fire*. Very few people seem to know that he had such an influential second career, working with CPRE's Herbert Griffin to set up England's first National Parks. But he never really gave up the track, and it was a source of chagrin among the older hidebound civil servants that he spent so much of his time on his athletics journalism and administration. He even used the office for meetings of the AAA (Amateur Athletics Association), but it suited me - he used to give me free tickets to events at White City Stadium.

Griffin's campaign for National Parks took over 20 years, and I've learned that any countryside campaigner has to be in it for the long haul. Our unique rural character has evolved over centuries, and the planning policies that protect it took decades to secure – and yet short-term economic priorities always seem to override the needs of communities and the environment. That's why it's more important than ever that people get involved with CPRE in their area, and help us win the argument for the right development in the right place."

**Find out more:** Visit [cpreherts.org.uk/volunteer](http://cpreherts.org.uk/volunteer) to see the roles available in Kevin's friendly team.

## Current issues

### Good news from Mortimer Forest

CPRE campaigners celebrated recently after Forest Holidays, a company 15% owned by the Forestry Commission, abandoned plans to build 68 large-scale holiday houses, shops and facilities near the peaceful beauty spot of High Vinnalls in Herefordshire, near the historic town of Ludlow and just 400 metres from the boundary with Shropshire.

CPRE Shropshire, along with CPRE Herefordshire and the Save Mortimer Forest action group strongly opposed the idea, believing that it was a bad deal for wildlife, local people and for the Forestry Commission itself. Wildlife habitat would have been destroyed and the unspoilt beauty, peace and tranquillity of the forest lost to a busy holiday park. All for a derisory return for the Forestry Commission - although the luxury cabins would have rented out at up to £4,000 per week, the Forestry Commission would have received only £3,000 per cabin, per year.

CPRE Shropshire had another recent success after it joined local action groups in opposing a proposal for 52 homes on Radbrook Fields in Shrewsbury. As well arguing that the area has over six years' housing land availability supply, CPRE Shropshire's objection pointed out that this popular green space is designated for wildlife - and not allocated for housing - in the local plan.

### Churchyards and orchards

CPRE Devon has been celebrating rural character with their Devon's Best Churchyard competition and a new book celebrating the county's orchards. The competition has helped to highlight the importance of churchyards for wildlife and tranquillity, while the book (sponsored by CPRE Devon) raises awareness of the diversity of Devon's threatened apple varieties.

**Find out more** at [www.cpredevon.org.uk](http://www.cpredevon.org.uk)



Current issues

**Local housing need**  
Towards the end of 2018, CPRE responded to the Government’s consultation on their proposed approach to local housing need assessment. We highlighted that the standard method for the estimation of local housing demand is already deeply flawed, and the proposal to retain the use of the 2014-based household projections for a ‘time limited period’ fails to provide real certainty and contradicts the general requirement of national planning policy, as explicitly stated in para 31 of the 2018 National Planning Policy Framework, that the ‘preparation and review of all policies should be underpinned by relevant and up-to-date evidence’.

Our response raised concerns that the effect of requiring the continued use of the discredited 2014-based projections will be that local planning authorities will be expected to plan for higher levels of growth than the demographic evidence provided by ONS shows are strictly necessary to meet the needs of their communities. This will put unnecessary pressure on land that government has committed to protect for the wellbeing of citizens. CPRE strongly advises that the 2016-based household projections are used. This is because, while their assumptions and outputs may still be open to challenge, the 2016 projections are more objective than the 2014-based projections, being both more up-to-date and produced by an agency that is fully independent of the policy-making body. We submitted that any assessment of local housing demand should take account both of the NPPF policies that indicate where development should be constrained, and of the willingness and capacity of the construction industry to deliver the types and tenures of homes that are needed to address the housing crisis.

INreview

Our perspective on countryside issues

Biodiversity Net Gain

**Net Gain - defined by the recent Defra consultation as making sure development leaves habitats in a measurably better state - represents a small, but vital, part of the Government’s 25 Year Environment Plan. But a multifaceted approach is needed to reverse long term declines in biodiversity and enhance our natural environment for the benefit of present and future generations.**

Whilst CPRE supports the principle of mandating a net gain for biodiversity, it is clear that more needs to be done as the details of the proposals are developed; as noted in the recent Natural Capital Committee’s *State of Natural Capital Annual Report 2019*, the proposals currently ‘fall short of what is required to ensure that development does not lead to net environmental loss’. In order for net gain to be a success there are a number of fundamental concerns that will need to be addressed.

A last resort

The mitigation hierarchy must be strongly enforced, with clear guidance on how this is to be done. Particular care is needed to avoid providing loopholes that developers will exploit. It must be clear that the need to provide compensatory habitats (i.e. offsets) for damage done will only occur in a very small number of cases as a last resort, where there are no practicable alternatives that would avoid harm. This compensatory, additional or enhanced habitat should be local. A clear spatial framework is essential in delivering this.

There must also be a recognition that no amount of ‘gain’ can compensate for the loss

of irreplaceable habitats, including ancient hedgerows, should be no-go areas for development. By their very nature such habitats cannot be adequately compensated for. Therefore any development that harms them should only occur in cases of Overriding Public Interest. In such exceptional cases, mandated gains should be much higher than business-as-usual net gain.

**“No amount of ‘gain’ can compensate for the loss of irreplaceable habitats, including ancient hedgerows”**

Many local authorities do not have the resources or expertise to ensure that plans and decisions are based on a sound understanding of the complexity of the natural environment. Provisioning of resources and access to comprehensive data on biodiversity should be a priority to ensure local authorities can maintain control over decision-making, and under-resourcing is not exploited by developers wishing to minimise obligations.

The bigger picture

In the context of limited resourcing, it must also be ensured that damage to other ecosystem functions and soils does not take place in the pursuit of net gain. There is a risk that while biodiversity net gain may be achieved, other ecosystem services from the soil and landscape, for example, may decline. Effective monitoring – by

a well resourced and independent body – will be essential in evaluating the success of net gain and its effect on other developer contributions.

Net gain should include wider natural capital, so that opportunities for joined up work are not missed. For example, new woodland creation could be sited to both increase biodiversity *and* reduce air pollution/reduce flood risk/benefit local people’s mental health. The Government must provide a timeframe for its implementation and cover issues such as carbon, water, landscape, tranquility and heritage in this approach.

We have some serious concerns that the proposal as it stands repeats pitfalls of previous approaches to biodiversity offsetting, instead of ensuring the mitigation hierarchy is adhered to. This concern is exacerbated by the fact that a significant proportion of the consultation focuses on the provision of off-site compensatory habitats and a tariff. The examples given imply that a loss is required before achieving a ‘net gain’. This could lead to the degradation of our natural environment as the Government’s house building targets override all other considerations.

CPRE’s key criticism of the offsetting concept remains that it could make it acceptable to lose the biodiversity history of a site, and replace it with compensatory habitat that lacks connections to the local ecosystem, landscape and communities. We will continue to work to ensure Biodiversity Net Gain is a well designed and implemented scheme that secures positive outcomes for biodiversity, creates better places for communities, and improves health and wellbeing.

QandA

The answers you need

Intrinsic value

**Q My community is facing plans for a large development of executive-style housing on farmland outside the village boundary. In the present planning system, what hope is there of arguing that this would damage the character of the countryside – especially when my council doesn’t have a five year housing gland supply, and the land is not designated or a protected landscape?**

**A** CPRE Lancashire was recently involved in a relevant case when local residents and Ribble Valley Borough Council successfully convinced a Planning Inspector to dismiss an appeal by the Trustees of Hammond Ground against a refused planning application due to harm to the countryside.

Altered farm buildings

**Q A wealthy landowner has purchased a large farm near my daughter’s home, and has obtained planning permission for an agricultural building well outside the farmyard, prominently positioned on a scenic footpath my family regularly enjoys. I believe the newly built barn is far largely than the plans indicated, and I suspect it is a Trojan horse for a future conversion to residential dwelling, due to its picturesque setting. Are their any precedents for challenging such blatant attempts to circumvent proper processes?**

**A** A recent high-profile case in Herefordshire saw a retrospective planning application (183609/F) for a barn to shelter sheep and store hay refused amid similar

CPRE Lancashire had written a letter of objection to the council in July 2016 concerning the application (reference Ribble Valley Borough Council 3/2016/1192) for 50 dwellings on Hammond Ground, due to harm that would result if the greenfield site outside the settlement boundary of the village of Read was approved. In April 2017 the council’s Planning Committee refused the application.

The developer challenged the refusal by appealing to the Planning Inspectorate (APP/T2350/W/17/3185445) and the appeal saw the council successfully make the case that the development proposed was inappropriate in respect of a number of policies contained in the adopted Core Strategy. The Inspector was not persuaded that the site was a ‘valued landscape’,

although he did refer to the NPPF, 2018 Paragraph 170, which sets out that decision-makers should recognise the intrinsic character and beauty of the countryside. He also concluded that the proposal would cause some harm to Read Hall - a Grade II\* listed building situated to the West of the appeal site.

In weighing the planning and heritage balance, the Inspector found the application was in conflict with four local plan policies. Despite the council not being able to demonstrate a five year housing land supply (3.86 years) the Inspector concluded that the substantial harm to the character and appearance of the countryside significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework when taken as a whole.

In 2015 Herefordshire Council raised no objections to the construction of a barn that the applicant stated was to shelter sheep, particularly during the lambing season. But when the application documents became available on the council’s website it became clear that the height and footprint were both greater, it was not in the same position or orientation, a staircase had been inserted and the external materials and colours were different. CPRE Herefordshire’s objection identified the inadequacies of the planning application and the breaches of control; the structure was more residential than agricultural, with well insulated walls, a staircase and wood-burning stove, and extensive sheets of transparent cladding that provided wide landscape views from the interior.

Current issues

**Battle for Halgavor Moor**  
CPRE Cornwall is fighting Cornwall Council’s intention to allocate Halgavor Moor for building, with chairman Richard Stubbs saying: ‘We are being asked to submit to an urban wasteland of unemployment and second homes. This will do nothing for Cornwall except pollute our rivers, increase CO2 emissions and destroy yet more of our natural world, the balance of which is so essential for our wellbeing. For the sake of decency and common sense, now is the time for Cornwall Council to listen to the wishes of local people and environmentalists alike. If not, we will fight this for the months and if necessary, years to come.’

The group’s objection argued that ‘the public consultation procedures have not been properly followed and that the 770 houses proposed within the Bd-UE2 land allocation are in excess of the overall Bodmin figure original agreed with Bodmin Town Council’. The objection highlighted ‘the absence of a scientifically prepared hydrological report for the site and the opportunity to consider its implications’ on the River Camel Special Area of Conservation.

CPRE Cornwall pointed out that ‘Halgavor is an unspoilt and ancient moor combining marshland with sinks and springs along with prime quality arable land and quite extensive oak woodland - this diversity and richness clearly represents a significant wildlife habitat.’ Campaigners are calling for a comprehensive Environmental Impact Assessment and pledge to ‘continue to strongly oppose to the destruction of this special place.’



Current issues

**West Hampshire water resources**  
Moya Grove, CPRE  
Hampshire’s water expert, has been reporting on the latest situation with West Hampshire water resources. Moya attended the meeting held by Southern Water Services (SWS) on 22 January when they presented the solutions planned for water supply in West Hampshire. Here, the new restrictions on taking water from the River Test and the planned sustainability reductions from the Itchen have meant that expensive large scale solutions are needed if they are to meet their legal duty to supply. They can no longer rely on the rivers.  
None of these solutions are yet delivering water and in the short term, if there is a drought and water levels in the river go below the level at which they are not allowed to take any supply, (the so called “hands off level”), SWS will need to start the drought order sequence. Over a period of three months, applications will be made to take water from the Test despite its protection in order to get water to our homes. This was all agreed with the Environment Agency at the Public Inquiry in March 2018. CPRE Hampshire is very worried about the impact of this on the Test, as are all the conservation groups and the fisheries representatives.  
There are varying options depending on the effectiveness and timing of the different solutions, including reducing everyone’s water use to 100 litres per person per day by 2040 (the current average use is 140). With climate change meaning water shortages and reduced rainfall, CPRE Hampshire is keen to help identify solutions.

Saving our soils

**I**n the run-up to the United Nations ‘World Soil Day’ in December, CPRE called for a recognition of the importance of soil and its impact on climate, environment and society  
CPRE’s *Back to the Land* report urged a radical rethink of farming practices and soil management in order to help regenerate the soils that underpin our supply of food and environment. It sets out practical ways to restore soil and new approaches to policy.  
Soil provides many benefits to the health of humans as well as our landscapes and wider environment. It is not only fundamental to the production of food, but it also filters and stores excess water in the ground and absorbs carbon dioxide from the atmosphere, making it critical in the fight against climate change.  
However, CPRE points out that a combination of industrial

farming practices, poor land management and damage from development have created a perfect storm that has resulted in dangerous levels of soil erosion, compaction and a loss of soil’s fertility – this degradation of soil costs around £1.2 billion a year, in England and Wales alone.  
**The extent of the damage**  
The report highlights that common farming techniques, such as inversion ploughing, as well as overgrazing and compaction from heavy machinery, has led to almost 3 million tonnes of topsoil being eroded every year across the UK. These forms of soil degradation have left an area of farmland the size of Yorkshire at risk of further erosion – more than one third of all of the UK’s arable land. Up to 2.9 million tonnes of topsoil are estimated

to be lost to wind and water erosion annually in the UK.  
Graeme Willis, CPRE’s senior rural policy campaigner, said: ‘Soil must be seen as a fundamental asset for delivering productive farming and a healthy countryside. For far too long we have been ignoring the fragility of such a precious commodity. Only now is the Government starting

“Soil must be seen as a fundamental asset for delivering productive farming and a healthy countryside”

address the damage decades of neglect has caused. Ensuring our soils are healthy is crucial if we are to effectively tackle climate change – or mitigate its worst effects. New agriculture policy must promote measures that support farmers to sustainably manage, protect and regenerate soils, and drive carbon from the atmosphere back into the ground.’  
Damage from development is also a major threat to health of England’s soils, says the report. Based on current annual rates of land lost to development, CPRE warns that 1,580km2 of farmland – an area the size of Greater London – will be lost within a decade. The use of undeveloped land for building has more than tripled from 4,500ha a year in the 2000s to 15,800ha (2013-2017). At current rates around 1% of England’s farmland is converted to built development each decade.  
In addition to killing soil by sealing it with concrete or tarmac, development projects also excavate tens of millions of tonnes of soil every year, much of which is treated as waste.  
The most recent data highlighted in the report shows that in 2014, in the UK, more than 20 million tonnes of soil was sent to landfill – equivalent to the weight of more than 400 Titanics – and that almost half (45%) of all ‘waste’ buried in the same year was soil.  
**A vital carbon store**  
CPRE warns that, in order to effectively address climate change and limit global temperature rises to 1.5°C in the timeframes set out by the Intergovernmental Panel on Climate Change (IPCC), urgent action is needed to  
**“The Government must put in place a firm goal to stop soil degradation by 2030”**



Development projects excavate millions of tonnes of soil every year, much of which is treated as waste.

halt the degradation and loss of our soils.  
In the UK, soil stores roughly 10 billion tonnes of carbon – the equivalent of 70 years of annual UK greenhouse gas emissions. However, degradation has led to most arable soils having already lost 40-60% of their organic carbon. The natural environment acts as a regulator of climate with oceans, forests and soils acting as critical carbon sinks. But land use changes, particularly agriculture, have undermined this over a long period of time. Cultivation of rich organic forest and grassland soils to feed people and livestock continues to cause greenhouse gas emissions through various forms of soil degradation. On one estimate, most arable soils have already lost 40-60% of their organic carbon.  
Preventing the loss of greenhouse gases from soils and rebuilding their carbon stores means that better farming and land use will be crucial in our attempt to limit the worst effects of climate change.  
If properly managed, soils could help to reduce the flooding and erosion that more frequent extreme weather could bring. However, if they continue to be managed badly, soils will lack the resilience to cope with storms or drought, CPRE fears.

**Practical solutions**  
The report sets out five innovative, yet practical, solutions that would reduce the degradation and loss of soil, and help to regenerate them through sustainable management. The first four relate to farming practice and the last to how policy might reduce damage to soils from development.  
Soil sensitive farming such as conservation agriculture, agroforestry, pasture-based livestock farming and farming on rewetted peatlands, if scaled up, would help the Government reach its emissions targets by locking in carbon, as well as helping to combat the effects of climate change, improve water quality and restore the health of the natural environment.  
CPRE suggests specific policy measures that could support the scaling-up of these approaches, such as ensuring the new Environmental Land Management scheme is properly funded and incentivises farmers by rewarding them for protecting and regenerating soils. The Government must put in place a firm goal to stop soil degradation by 2030, and establish a new goal of net zero greenhouse gas emissions from agriculture by 2050.

**Find out more:** Read the full *Back to the Land* report at [www.cpre.org.uk/resources](http://www.cpre.org.uk/resources)



Soil provides many benefits to the health of humans as well as our landscapes and wider environment.

**Worms in decline**  
42% of farmed fields have poor earthworm biodiversity – meaning either very few or no worms were found. This is according to the recent Rothamsted Research project looking at England’s farmland, which found key earthworm types are rare or absent in two out of five fields, leading to the majority of farmers affected vowing to change the way they farm. The results indicate widespread, historical over-cultivation, and may explain observed declines in other wildlife, such as the song thrush, that feed on these worms. The #60minworms project was the first comprehensive worm survey concentrating solely on farmland and was carried out by farmers themselves – 57% of whom said they would now change their soil management practices as a result. The scientist behind the survey, Dr Jackie Stroud, a NERC Soil Security Fellow at Rothamsted Research, said: ‘Earthworms are sensitive and responsive to soil management which makes them an ideal soil health indicator. The aim of this research was to find a baseline of farmland earthworm populations that would be useful and used by farmers to assess soil health now and in the future.’

**Slowing carbon reductions**  
Carbon Brief analysis shows the UK’s CO2 emissions fell for the sixth consecutive year in 2018, the longest series of continuous reductions on record. The estimated 1.5% reduction was once again driven by falling coal use, which was down 16% compared to a year earlier, whereas oil and gas use were largely unchanged. Household CO2 emissions increased by 1% in 2017, while the Committee on Climate Change recently ‘failed’ the Government on emissions reduction in 15 out of 18 policy areas.



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## The State of Rural Services

**R**esidents of rural England are being cut off from building businesses, accessing digital services and going about their daily lives thanks to inadequate phone signal and 4G connections, rapidly declining transport networks and ‘contracting’ public sector services, according to the latest *State of Rural Services* report launched in Parliament earlier this year, which highlights the growing challenges facing those living outside of cities or major towns and warns that they are consistently losing out.

The research, published by Rural England CIC, finds that, despite ongoing investment, a basic phone call cannot be made inside 33 per cent of rural buildings on all four mobile networks (EE, Three, O2 and Vodafone), an issue that affects just three per cent of urban premises. This covers the majority of mobile phone users in the UK. Worse still, a 4G connection cannot be accessed in more than half (58%) of rural premises, compared with just a sixth of those in cities. This comes at a time when online access to services is increasingly the primary or default option, and in the wake of Government plans to digitise GP services and process universal credit applications online.

### Neglecting the vulnerable

The report, which looks at vital services across key areas including health and public health, public transport, libraries, young people’s

services and retail, lays bare the difficult situation facing those in rural areas – covering 17 per cent of England’s population overall. Nearly a quarter of the rural population is aged 65 or over, with this group particularly vulnerable to underinvestment in healthcare and declining high streets. Yet they face increasing access barriers to getting around as rural transport provision is axed by local authorities struggling with budgetary constraints.

According to the research, less public funding is directed towards rural residents than in urban areas, despite the higher cost of providing essential services such as social care, education and public transport in rural parts. For example, local authority expenditure on public transport is significantly higher in predominantly urban areas with 63 per cent more spent on bus subsidies, and 348 per cent more spent on discretionary concessionary fares (excluding Greater London).

The findings show that in 2016/2017, 191 bus services were reduced and 202 were withdrawn altogether from shire areas, leaving many residents – particularly those unable to drive for age reasons or to afford a car – struggling to fulfil vital activities like shopping, travelling to health appointments or taking part in social activities. In Cumbria, Isle of Wight, Oxfordshire and Wiltshire, there is no longer any local authority budget set for subsidising bus routes.

The analysis shows that residents of small rural settlements now travel 4,177 more miles annually on all forms of transport than their urban counterparts (including on foot). They spend on average 384 hours (or 16 days) every year on the go.

With the number of over-85s expected to double over the next 20 years in rural areas, there are serious concerns about rising demands upon local health services, yet the report finds that almost 30% of rural residents live more than 30 minutes’ drive time from a major hospital, rising to 90 per cent if they are travelling by public transport or walking. Over 40% live more than an hour away by public transport or walking.

### Barriers to rural retail

The decline in high streets is exacerbating the challenges facing rural residents. And while online retail is a lifeline for some, rural consumers have relatively poor access to parcel delivery points, which also has implications for parcel returns. Currently, almost half of rural residents need more than 30 minutes for travel time to town centres if using public transport or walking and nearly 10% need more than an hour.

Other key findings from the report include a 36 per cent discrepancy in funding per head that rural local authorities receive for public health duties in comparison with their urban counterparts; young people from rural areas tend to score worse on a number of key public health

**“30% of rural residents live more than 30 minutes’ drive time from a major hospital”**

indicators – risky behaviour, alcohol consumption, smoking and being bullied; 89% of rural journeys are made by car (73% for urban residents); in 2017 half of farmers only had dial-up fixed line connection speeds (below 2 Mbps); local authority 2017/18 budgets per resident for library services were 25 per cent less in predominantly rural areas than in predominantly urban areas.

The report provides evidence where future government policies should be rural proofed – with specific provisions made for these communities if necessary – so they cease to be disadvantaged.

Brian Wilson, author of the report and chairman of Rural England CIC said: ‘Nearly a fifth of people in England live in rural areas, yet the evidence shows that many of them face inadequate services. Two years after we released the first *State of Rural Services* report it seems clear that rural residents frequently still lose out in terms of funding and access to services. Policies and service delivery must be properly rural proofed.’

**Find out more:** read the full report at <https://ruralengland.org/state-of-rural-services-report-2018/>