



Campaign to Protect
Rural England
Standing up for your countryside

FIELD WORK

Spring 2018

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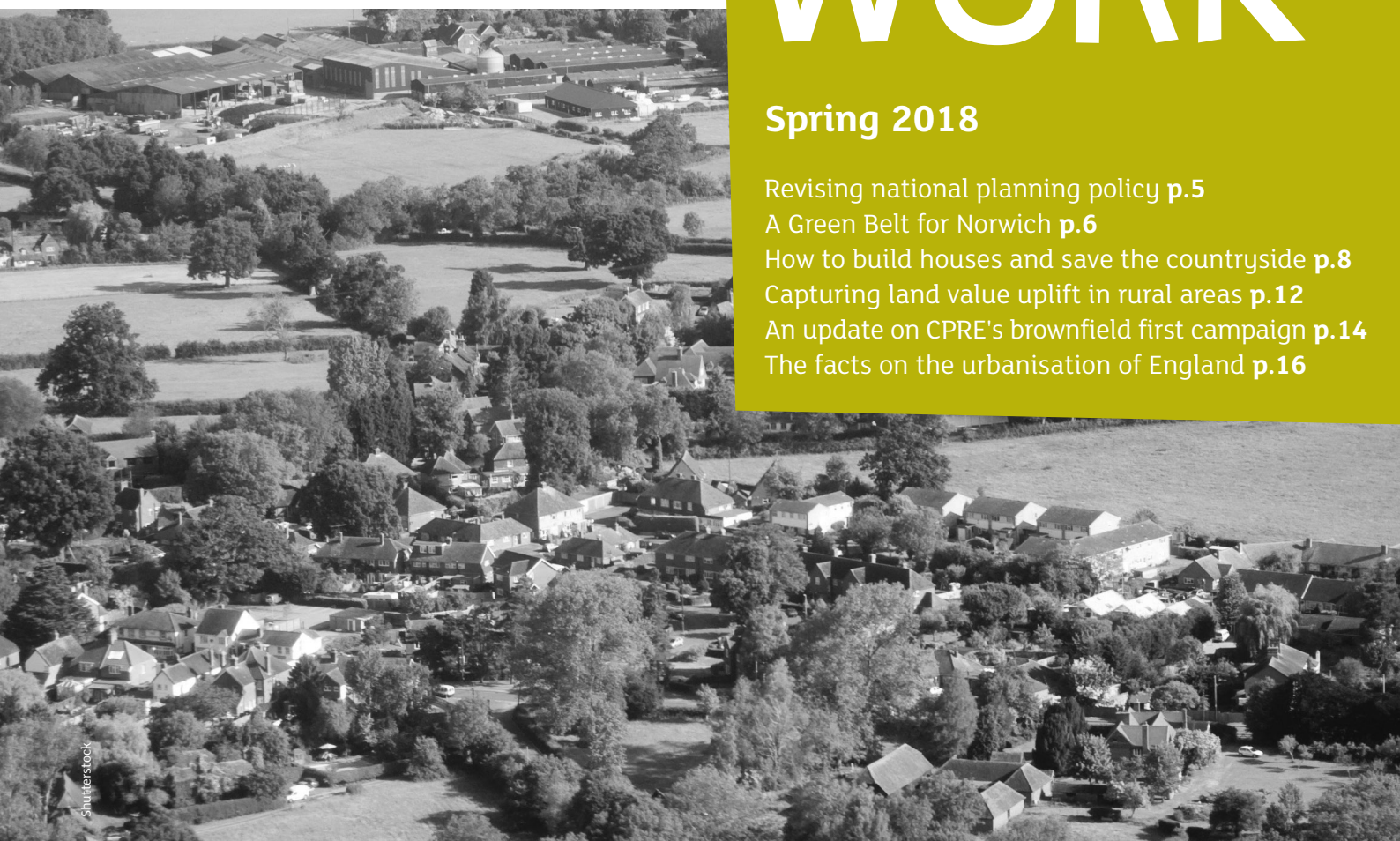
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Closing the viability loophole to increase rural affordable housing

Housing developers are using a legal loophole to avoid building affordable homes across the countryside, according to data analysed by CPRE and the housing and homelessness charity Shelter.

Looking at eight rural councils over one year, the analysis shows that half the affordable homes that councils were required to build were lost when viability assessments were used – demonstrating that the housing crisis is not just confined to our cities, but is having a serious impact in the countryside as well. The research found that, on schemes where viability assessments were used 1,966 of the homes were meant to be affordable, according to the housing policies set by the local authority. As a result of the viability assessments, only 1,028 of these homes were subsequently affordable. This is a loss of 938 affordable homes that could have been built, equivalent to 48%.

These new housing sites achieved just 18% affordable housing – half the level required by councils' policies. Of the councils we studied, rural communities in the south and east of England lost especially large numbers of affordable homes – in the very areas where affordability pressures are most acute. On sites where developers submitted a viability assessment: Central Bedfordshire lost 533 affordable homes – a 58% cut compared to local policy; Cornwall lost 232 affordable homes – a 35% cut; Horsham lost 67 affordable homes – a 26% cut.

Smaller builders are losing out

Developers of larger schemes are far more likely to use viability assessments to cut affordable housing. The average number of homes on sites where viability was used was 166, compared to an average of 71 on schemes with no viability assessment. This has implications for competitiveness and the overall efficiency of the housebuilding sector. It skews opportunities in favour of big developers building big sites, with those building smaller schemes more likely to play by the rules and lose out financially. This is particularly important in rural areas, which often rely on smaller schemes to meet their housing needs.

The research was conducted with EGi and looked at 154 planning permissions (from 2015-16) across eight local planning authorities in rural areas in eight different English regions. The local authorities were selected to provide a spread across the country: County Durham in the North East, South Lakeland in the North West, Hambleton in Yorkshire and the Humber, Newark and Sherwood in the East Midlands, Shropshire in the West Midlands, Central Bedfordshire in the East of England, Horsham in the South East and Cornwall in the South West.

Following cuts to capital grant and financial restrictions on councils, we now rely on private developers to deliver a large share of new affordable homes through the Section 106 system. But since 2012, national planning rules have blunted this tool by enabling the widespread use and abuse of viability assessments. Developers

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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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Closing the viability loophole to increase rural affordable housing

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can use viability assessments to argue that building affordable homes could reduce their profits below competitive levels, which they define as around 20%. This gives them a legal right to cut their affordable housing quota. It means developers are over-paying for land and recouping the costs by squeezing the affordable housing commitments – a tactic often used by developers building big housing schemes.

The consequences for rural communities can be particularly devastating, as house prices are often higher – and wages lower. Losing even a small number of affordable homes can be the difference between post offices and schools staying open or not, and villages thriving or dying as families and young people are priced out.

Making the case for change

The joint *Viable Villages* report comes months after Shelter carried out similar research on housing lost to viability assessments in urban areas. That research, published in November 2017, showed that 79% of affordable homes were lost in nine cities across England through viability assessments. Now, armed with the new evidence, CPRE and Shelter are calling on the Government to use the review of the National Planning Policy Framework (NPPF) to stop developers from using this loophole to wriggle out of providing the affordable homes that communities desperately need.

“Viability assessments should not be used to manage normal market risks, and should only be used in limited, exceptional circumstances”

Polly Neate, Shelter chief executive, argued that ‘with this new research we can see for the first time the true scale of our housing crisis – it’s not just blighting cities but our towns and villages too.’ CPRE’s chief executive Crispin Truman said: ‘A lack of affordable housing is often seen as an urban problem, with issues of affordability in rural areas overlooked. It cannot be ignored any longer. Too much of our countryside is eaten up for developments that boost profits, but don’t meet local housing needs because of the “viability” loophole. CPRE is calling for urgent action from the Government to close the loophole to increase the delivery of affordable housing, otherwise rural communities risk losing the young families and workers which they need to be sustainable.’

“CPRE urges the Government to create a new viability system that is fair, limited and transparent”

A fair, limited and transparent system of viability assessments can play an important role in fixing the broken housing market at the heart of the rural affordability crisis – improving efficiency and competition in the housebuilding sector, speeding up the rate at which new homes are built, and boosting public support for new developments. The Government has made clear its intention to improve the current viability system, gathering views on reform as part of last year’s ‘Planning for the right homes in the right places’ consultation. The new Ministry of Housing, Communities and Local Government now has an opportunity to fix this broken system during the revision of the NPPF. CPRE and Shelter urge the Ministry to enact reforms in line with our recommendations, to close the viability loophole once and for all and create a new viability system that is fair, limited and transparent.

Recommendations

We welcome the fact that the draft revised NPPF sets out that, in line with our demands, site-specific viability tests will now have to be ‘proportionate, simple and transparent’ and developers will not be able to cite the price paid for land as a reason for providing less affordable housing. Some key details, however, are still missing. The final NPPF should include a clear statement that developers, land promoters and landowners must account for affordable housing and other planning requirements when designing schemes and setting land prices.

The Benchmark Land Values used to assess planning applications must reflect affordable housing policies, so that there is no option to overpay for land and recoup the costs later through viability assessments. This will have particular benefits in rural areas, because the significant uplift in land value for agricultural land with residential planning permission should mean more planning gain is available to finance affordable homes. In this way, a fairer NPPF can suppress land values to policy-compliant levels, ensuring that developments can deliver the homes rural communities need.

The NPPF should be also amended to guarantee landowners and developers ‘a return’, not ‘competitive returns’ whose level the industry is free to define for itself. By removing the protection for ‘competitive returns’, the new NPPF would instead allow councils to establish the level of landowner and developer returns needed to incentivise housing development, based on up-to-date market information. Viability assessments should not be used to manage normal market risks, and the government should produce new rules on the limited, exceptional circumstances in which they can be used. Finally, viability negotiations should be published and open to public scrutiny, with all negotiations published and open to public scrutiny.

Find out more: Read the full *Viable Villages* report at www.cpre.org.uk/resources

BREAKthrough

How our work is making a difference

Lake District zip wire defeated

The Friends of the Lake District were celebrating in February, when an application for the proposed Thirlmere Activity Hub (including eight zip wires over Thirlmere reservoir) was withdrawn before it could be considered by the planning authority.

The Lake District National Park received 3,476 letters and emails of objection, a petition of 13,535 objecting, and only 163 letters and emails in favour. The Friends objected on the fundamental point that the location was inappropriate for this type of development given the detrimental and destructive impacts to the landscape character and tranquillity of the location. They were delighted by the overwhelming public response to their campaign, with many people sending their own objections (containing many heartfelt descriptions of what the area means to them), along with wonderful photos and paintings of the Thirlmere valley. Dozens

also braved wet weather for a protest march in January, with banners proclaiming 'This is a National Park, not a Theme Park'.

CPRE's national office supported the objection of the Friends of the Lake District (our representatives in the National Park), arguing that while the activity hub supported investment that will increase people's access to and enjoyment of our beautiful countryside, access must be managed sensitively to avoid damaging the very assets that attract people to the area. Our national objection argued that the zip wires and associated infrastructure would have a significant and detrimental visual impact over a wide area, including views from surrounding mountains such as the iconic Helvellyn.

With the appearance, noise and speed of the zip wire activities being incongruous in this wild and tranquil landscape, CPRE was particularly concerned

about the overall effect on the tranquillity of the area – including by generating extra traffic on a narrow road network. Their objection concluded that if this development were permitted it would set a precedent which would affect consideration of other similar schemes in the Lake District National Park and in other National Parks around the country.

Following a Freedom of Information request by Friends of the Lake District, the National Park published their Planning Officer's draft report on the application. Though not ultimately needed, the report recommended the refusal of the application on grounds of 'the substantial harm to the special qualities and Outstanding Universal Value of the Lake District', and cited 'the volume of objections from individuals and a diverse range of organisations representing a broad range of interests at the local, regional and national level'.

Norfolk energy solution

CPRE Norfolk recently welcomed the decision of Swedish firm Vattenfall - which is behind plans for the Norfolk Vanguard and Boreas offshore wind farms - to use a more advanced method for transmitting the energy generated offshore to the grid, eliminating the need for additional infrastructure in the landscape.

Further mitigation where the energy cables make landfall will also reduce damage to Happisburgh cliffs, and tunnel under local wildlife sites rather than going straight through them. Michael Rayner, planning campaign consultant

at CPRE Norfolk, said: 'We are glad Vattenfall has made this decision. They are not going to be drilling on the beach or between the tide lines, and that can only be a good thing. The trenches required for the cables are 50% narrower than they would have been, and they will not need any relay stations, so the outcome for the Norfolk countryside was the best we could hope for. It will mean a lot less worry for the local residents.'

North Norfolk MP Norman Lamb said Vattenfall's was 'a novel approach for the UK. Direct current has been used elsewhere but in the UK context it is quite challenging. It is

more expensive up front but it is more environmentally sustainable because you lose less energy down the length of the cable. I really think the pressure from local people has had an effect on the outcome. I openly applaud the company for their willingness to listen.' CPRE Norfolk's recommendations were acknowledged several times in Vattenfall's report on the consultation; the branch praised the efforts of the many local activists who helped demonstrated the power of pushing for options which cause the least amount of damage to the countryside.

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Current issues

Improving the use of planning conditions

CPRE views were represented by the Wildlife and Countryside Link's (LINK) February response to the Government's consultation on draft regulations for planning conditions. Whilst recognising that early negotiation between applicants and local planning authorities (LPAs) is important, the LINK response highlighted that the requirement to secure written consent for pre-commencement conditions will have a number of adverse consequences: placing further pressure on already overstretched planning authorities and technical specialists (such as ecologists and archaeologists), and allowing applicants to 'barter' to reduce or remove conditions they perceive to be unacceptable – like biodiversity surveys and monitoring, tree surveys, ecological mitigation, flood risk and archaeological investigation. We also fear that LPAs, pressed to deliver more homes and approve planning applications, will be under significant pressure not to refuse applications – and are therefore more likely to grant applications without the pre-commencement conditions necessary to minimise development harm and ensure it is truly sustainable.

Ultimately, the response argued that the requirement will undermine the 25-year plan for the environment, delay planning decisions and constrain the ability of LPAs to introduce adequate conditions to safeguard our communities and our natural and historic environment. It reiterated that pre-commencement conditions are an important tool in enabling LPAs to secure biodiversity improvements or ecological mitigation, and allowing them to require mitigation and compensation measures to be in place before development activities that may disturb protected species start.

NEWSroundup

Keeping you on top of countryside developments

A 25-year plan for a greener future

CPRE welcomed the Government's commitment to improving the environment shown in the 25-year plan launched in January. But we also warned that the Government needs to follow up its vision with actions to make sure we use resources better, from plastics to land, if its vision is to be delivered.

We submitted written evidence to the Environmental Audit Committee inquiry into the 25-year plan in March, in addition to our contribution to the submission made by Wildlife and Countryside Link. We called on the Government to clarify how new commitments will be funded, implemented and monitored, pointing out the need to keep stakeholders like CPRE closely involved in the development of specific commitments – such as the proposals for a 'net environmental gain' approach. On that specific proposal, we warned that offsetting damage should be an absolute last resort after all

attempts have been exhausted to avoid, mitigate and then finally compensate for damage to habitats and landscape. Previous biodiversity offsetting approaches have lacked understanding of the complexity of natural systems, assuming that all environmental assets are quantifiable and replaceable.

Our submission also identified the need for further Government action, beyond that included in the Plan, if it is to meet its manifesto commitment to enhance the environment. Additional actions CPRE would like to see include: introducing a deposit return system for drinks containers; ensuring that existing national and local policies are effectively managing noise and light pollution on the ground; and addressing the significant impact road building has on the environment. The Government also need to recognise that land is a finite resource and more needs to be done to ensure it is treated as such and delivers multiple

benefits. Seeking efficient use of land should be a national policy objective, and our submission reiterated that a Land Use Strategy for England would help achieve this, as would reporting rates of land consumption, an indicator recommended by the United Nations for Sustainable Development Goal 11.

We concluded by warning that if the Government sees the production of the Plan as the end of the process rather than the beginning of it, it will fail. The development and monitoring of a set of metrics which cover all aspects of the Plan in the coming months is vital; as is the development, with stakeholders, of the detail of proposals in the Plan and a funding programme for their delivery. Finally, we called for the Plan to be underpinned by a new Environment Act and a new environment body to be established with power to take action if targets and indicators are not being met.

Edging closer to a deposit return system

In the ongoing campaign for an end to drinks container litter, CPRE were delighted by the December recommendation from the Environmental Audit Committee that the UK Government should introduce a deposit return scheme (DRS) for plastic bottles.

The Committee's new report, *Plastic Bottles: Turning Back the Plastic Tide*, concluded that DRS would help increase recycling and curb the devastation caused by plastic waste. The report followed a comprehensive inquiry into drinks container packaging to which CPRE submitted written and oral evidence. Another critical recommendation from the Committee is that packaging producers should be made financially responsible for the plastic packaging they produce, in line with CPRE's

lobbying. The Environmental Audit Committee urged the Government to adopt a fee structure that rewards producers who design recyclable packaging and increase charges on packaging that is difficult to recycle.

There were more promising signs for DRS in January when *The Times* reported that the Voluntary and Economic Incentives Working Group (set up as part of the Government's National Litter Strategy, at CPRE's suggestion) was due to report to ministers in February. We understand that the influential working group, which includes industry representation from the likes of Tesco and Coca Cola, recommended that 'DRS would result in far higher recovery of used bottles and cans as well as reducing litter and improving the quality of

material sent for recycling.' Also in February, Roseanna Cunningham, the Environment Secretary in Scotland, called for Michael Gove to work with her to deliver a UK-wide deposit system.

Despite the seemingly unstoppable momentum, CPRE continues to keep up the pressure. With the packaging industry proposing (as an alternative to DRS) that they could raise their contribution to the costs of recycling, CPRE's Litter Programme Director, Samantha Harding, said: 'The industry is trying to fool Mr Gove into not supporting a deposit scheme by offering a relatively small amount of money that will have nothing like as much impact on recycling and litter.' We are keeping our fingers crossed in the hope of a positive announcement from the Government before the summer.

dates of note

An Evening with Emma Bridgewater

CPRE's President, pottery designer and champion of British Industry in conversation with Caroline Kay, chief executive of Bath Preservation Trust. Emma will discuss the national issues most relevant to Bath, such as sustainable transport and Green Belt protection, reflecting on her experiences of countryside campaigning so far. For more info and booking, search 'CPRE Emma Bridgewater at: www.eventbrite.co.uk/ 18th April, St Michael's Without Church, Bath, 7-8.30pm (tickets £5.83)

Those Blue Remembered Hills - Valued Landscapes in a Time of Change

An illustrated lecture by landscape and environmental colour experts Carly Tinkler and Jem Waygood - will be of interest to anyone who loves the countryside and particularly planners, architects, Local Planning Authorities and developers. Booking via www.courtyard.org.uk/events. 26th April, The Courtyard, Hereford, 7.30-9pm (tickets free)

Securing our Natural Environment symposium

This joint meeting of the British Ecological Society and UK's Statutory Nature Conservation agencies will bring together policy officials, practitioners, natural and social scientists from across the UK and internationally to set the direction for nature conservation in the UK. More information: www.britishecologicalsociety.org/events/ 23-24 May, Manchester Metropolitan University

Music for a midsummer's evening

An evening of songs by the choir Andante. Tickets are £20 per person, which includes supper and a glass of Prosecco. Book at www.cprenorthants.org.uk/whats_going_on 21st June, St Andrew's Church, Cranford Hall, Cranford, Northamptonshire
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Revising the National Planning Policy Framework

With the revised draft of the NPPF published in early March, CPRE's initial analysis found that while there were some improvements, the approach the NPPF promotes will continue to be of considerable concern to many communities.

We called for the final version to empower councils to swiftly and robustly reject proposals for development that do not deliver on local aspirations for affordable housing, environmental protection and high quality development. Despite being structured around a presumption in favour of sustainable development, the draft revised NPPF does not mention the Government's commitment to the UN Sustainable Development Goals. While good intentions on sustainable travel are not reflected in what other branches of government are doing, and are contradicted by the current actions of the Department for Transport, and the Roads Investment Strategy.

Most disappointingly, councils will now be expected

to set housing targets for neighbourhood plan areas, even where an up-to-date neighbourhood plan exists. Neighbourhood plans can be overruled in a local plan review and if too few homes are being built elsewhere in the local plan area. On the plus side, where housebuilding falls below target local plans will no longer be automatically declared invalid, opening the floodgates to harmful speculative proposals. Instead, councils must produce an action plan to get things back on track, but there are no details yet of what powers councils will have, or whether they will simply be forced to release even more development sites.

There is much stronger wording on giving weight to the redevelopment of brownfield, and some positive words on ensuring appropriate but increased density of development. However, there is still no explicit brownfield first policy, despite government statements to the contrary,

without which developers may continue to cherry-pick greenfield sites. A major change is to specify the 'exceptional circumstances' test for altering the boundaries of a Green Belt in a strategic plan: this requires councils to demonstrate they have considered brownfield sites, increasing densities and other options with neighbouring councils before releasing land for development. However, it also appears to establish that high housing requirements are in themselves reasons to alter Green Belt boundaries. There is a worrying lack of detail on how harm to the purposes of the Green Belt can be minimised when boundary changes are made, or over what area the net should be cast to look for less harmful alternatives.

Find out more: CPRE will be preparing a coordinated response to the draft before the consultation ends in May, capturing the views of the whole organisation. In the meantime, follow the progress of the campaign at cpre.org.uk

Tackling the landbanking problem

After years of CPRE raising awareness of the issue of 'landbanking', the Government is waking up to the idea that the country's biggest housebuilders are hoarding land.

Secretary of State Sajid Javid wants Westminster to play a 'more active, muscular role' in tackling landbanking, and former Cabinet Secretary Sir Oliver Letwin MP is leading a 'Review of Build Out' aimed at tackling the problem, and to which CPRE submitted evidence in February. Previous CPRE evidence, compiled for a *Financial Times* investigation early this year, showed the UK's ten biggest housebuilders have increased the number of plots with planning permission they hold by a fifth in the past ten

years, and by two-fifths since 1998. Meanwhile, the number of homes completed each year has fallen by 13%.

Local authorities, housing associations and other smaller builders are often prepared to build more quickly, and better placed to provide affordable housing, or redevelop existing brownfield sites rather than our green spaces. They need to play a greater role, but they are being squeezed out as the biggest builders consolidate their grip on the market; the volume builders now have 59% market share, up from 31% in 2007. We also know that the developers hold wider, 'strategic' banks of land that do not yet have planning permission, the size of which is difficult to establish.

Our latest submission called for stronger powers for local authorities to compel builders to build out sites with planning permission. We need strong 'use it or lose it' measures for large housebuilding schemes, with exemptions that incentivise a role for councils and small or medium-sized builders, and for building affordable housing first. The Government should also explore reforms that make it easier to channel the rising values of land given permission for housing, towards funding infrastructure to serve that development – schools, healthcare and public transport. These reforms will help to combat the increasingly distorting effects of land hoarding on the housing market - and our countryside.

Current issues

United on fracking

CPRE's senior infrastructure campaigner Daniel Carey Dawes was a lead signatory - alongside Friends of the Earth, Greenpeace and WWF - on a joint letter to the Prime Minister criticising the actions of petrochemicals group Ineos in trying to force the National Trust to allow shale gas testing on its land.

Ineos is bringing legal action against the Trust after it rejected repeated requests for permission to carry out seismic surveys in its Clumber Park estate in Nottinghamshire. The letter highlighted the growing unpopularity of fracking among the public, with 'the most recent government poll showing twice as many people were opposed to fracking (32%) as supported it (16%)'. It concluded that 'landowners, communities and individuals should retain the right to protect and defend the assets they value', and called on the Government to 'issue an immediate halt to unconventional oil and gas exploration in the UK and invest heavily in clean renewable energy'.

Last December, CPRE joined Friends of the Earth in condemning attempts from Ineos to encourage the Government to intervene in applications for exploratory wells in Derbyshire and South Yorkshire on the grounds that the local councils have taken too long to decide. 'These are complex cases where both councils must fully evaluate the likely impacts. To do this takes both time and care and the councils have had to ask Ineos to provide further environmental information,' said Daniel Carey-Dawes. 'For Ineos to now bypass that process is both unfair and unreasonable. This disregard for local democracy is unacceptable'.

letter from the field



Words from local campaigners

CPRE Norfolk's Chairman Chris Dady explains how they are making the case for a Green Belt for Norwich

Dear reader,

Many people take Green Belts for granted, so much so it has been quite a surprise for people living in Norwich to discover the city does not actually have one.

Whilst some of the traditional protection afforded by Green Belts may be under threat, they still offer a higher level of countryside protection that can be guaranteed under local plans, especially as these are likely to become shorter term. CPRE Norfolk therefore decided to lobby for a Green Belt in the new Greater Norwich Local Plan.

We set up a campaign petition and issued a press release which brought us a 1,000 signatures in a short space of time. This was enough to persuade the planners that the consultation for the new plan would include a question about a Green Belt for the city, and whilst it has not been very positively written it has been included in the ongoing consultation. Our petition is now at over 1,750 signatures, and we issued another press release to get further support which we can present as part of our submission.

Whilst the planning legislation allows for the creation of new Green Belts, and Norwich in our view

clearly meets the criteria, ultimately the three local authorities involved in the plan have to want to go through the process required if we are to be successful. The challenge is to formulate a Green Belt proposal that captures the imagination of the public to give us the support we need, but does not seemingly interfere with the local authorities plans (nothing has been decided as yet of course!) so it is something they can agree to take forward.

We have therefore issued a plan showing a Green Belt option that should be attractive to everyone. We have only shown the inner area with green corridors rather than a continuous 'belt', which would give rise to opposition from two of the three councils involved. The green corridors are along existing routes such as rivers and railways radiating out from the city centre, and will expand out once they reach open countryside. We have sent the proposal to the local wildlife organisations to ensure we have their positive support, and the press release was issued on 1 March in plenty of time for the end of the consultation in mid-March. We were pleased that our proposal - including the map - was featured

prominently in the local press and news websites, including the Eastern Daily Press.

We hope that this coverage gives us enough additional support to ensure a proposal is taken forward to the next stage in the plan process, without creating opposition from the councils. As our local authorities begin the process of reviewing the adopted local plans for Norwich and its surrounding districts, with the likelihood that they will have to accommodate even more growth beyond 2026, it is now more urgent than ever that Norwich protects its green corridors for people and wildlife for the future.

A Green Belt, in the form of green wedges, is the way to achieve this long-term protection whilst not standing in the way of future development, and giving the opportunity for more links between houses and the countryside. Seeking long-term countryside access for all, with all the benefits that brings, should be a given and we will continue to work to this goal.

Find out more: Take a look at the proposed map and follow the latest in the campaign at www.cprenorfolk.org.uk

GOODideas

Learning from each other

Listening to the next generation

CPRE Lancashire teamed up with the Environment Agency earlier this year to facilitate a green 'listening event' with Chorlton Park Primary School in Manchester. The aim was to hear what the pupils wanted on the agenda for the Mayor of Greater Manchester's Green Summit on 21 March 2018.

The children, aged between 7 and 8 years old, had been learning about how to look after their environment, and had a good understanding of the damage that CO2 can do to our planet. They asked the Mayor to reduce the use of fossil based energy, and instead develop cleaner renewable energy projects. The pupils saw this as a logical way to protect our natural environment, as was reducing the amount of waste we throw away – informed by their school trip to a recycling centre. Many of the children's 'asks' related to

reducing our landfill, through better awareness of recycling, and education to make sure people use the right bins. Litter was also identified as a problem, with the pupils understandably concerned about the potential harm to animals. It was clear that the children had a lot of enthusiasm for creating rules that would have to be followed by 'grownups', suggesting that cameras should be installed in bins to 'catch those who aren't recycling properly', and to stop the sorting equipment breaking at the recycling centre.

Their second priority was that people should drive less to reduce carbon emissions, and instead walk and cycle more, or use public transport. Saving energy and natural resources was the third priority, with the pupils showing real awareness of the impact of energy hungry

devices, and the need to think about heating and lighting – motion-sensitive lighting was a popular solution, along with water metering to encourage people to turn off the taps. Finally, the children were passionate about the importance of trees for wildlife and clean air, and were keen to ensure that we plant more trees than we cut down, suggesting financial penalties for those who allow a net loss of trees to occur.

The overarching message from the children was the importance of education. They urged Mayor Andy Burnham to help educate people on how to take better care of the planet, and change their behaviour to benefit their own local environment. It is hugely encouraging for all countryside lovers that this generation is so well informed, and so enthusiastic about engaging with CPRE.

A new mascot for Devon's countryside

CPRE Devon recently unveiled their new 'Head Countryside Ambassador' – Barney the Bull! The character is designed to encourage children to look after the countryside and investigate CPRE issues – including the importance of wildlife and farming.

Youngsters have a chance to impress Barney and win a new Devon Countryside Ambassador badge in three different ways: by entering the branch's Spring writing competition, *'I Love the Countryside Because...'*; the Summer painting competition *'My Outdoors'*; or by getting involved in litter picking with their schools. CPRE Devon

have supported school's Outdoor Learning for a number of years and are looking forward to encouraging more children to learn about and appreciate our green spaces and countryside. Barney's 'BULLETins' will be emailed regularly to all Devon's primary schools, to keep in touch with news and events.

As well as the exciting educational work, CPRE Devon is launching a new competition to find 'Devon's Best Churchyard', with a top prize of £200 for the entry that provides the most peaceful haven for people and wildlife. Meanwhile, CPRE Devon's popular programme of events continued with a rural housing seminar in

Exeter in January, attended by 180 people as well as camera crews from the BBC and ITV. A lively Q&A session took place following the presentations, with many people expressing concerns over the number of houses planned for the area's green fields, without the necessary services, transport, infrastructure and affordable homes. The branch took the opportunity to announce that they have commissioned an independent research company to analyse all available data to understand the Devon's real housing needs.

Find out more about the competitions and CPRE Devon's latest work at www.cpredevon.org.uk

Corporate partnership tackles litter

CPRE Hampshire joined forces with outdoor outfitters Orvis UK for a country lane clean up in early March. Volunteers from both organisations cleared a combined 76kg of rubbish from two roads leading into Bambridge that are frequently littered by motorists. Both roads are situated close to the Itchen Navigation and run through some of the most beautiful and untouched countryside close to Eastleigh. Cans and plastics thrown from vehicles pollute the area and could get into the highly protected River Itchen. Orvis approached CPRE Hampshire for an opportunity to help, as Tanya Thorne at Orvis explained: 'We see much value in getting out in to our various communities, getting down and dirty and physically helping to clean up the countryside. Motorists and cyclists stopping to thank us for our efforts kept us going throughout the day and has simply spurred us all on to do more of these types of clean ups in the future.' Charlee Bennett, chief executive of CPRE Hampshire said '76kg in just a few hours was a great success – both lanes are looking much better.'

Celebrating farm shops

CPRE North Yorkshire is sponsoring the Farm Shop category in the *Yorkshire Post's* Rural Awards 2018. Two farm shops will receive awards; one smaller-scale and one larger outfit. Both will have been started as farm diversification projects and will be able to demonstrate outstanding success as a local employer, sourcing local food and drink, championing Yorkshire produce, and contributing to the rural economy.

Congestion, capacity, carbon?

CPRE responded to the National Infrastructure Commission consultation on a National Infrastructure Assessment in January. CPRE's submission pointed out that Brexit may be considered an opportunity for the creation of a UK National Infrastructure Bank, as suggested by the LSE Growth Commission and currently underway in Scotland. Such a bank must be oriented towards financing environmentally sustainable projects, and must operate subject to democratic scrutiny. To that end, we reiterated that the role of regulators will be critical. As a champion of the long-term interest, the Commission should ensure that concerns about short-term costs do not trump realisation of wider long-term benefits.

Our response welcomed the Commission's acknowledgement that new roads will not solve congestion issues, as highlighted by our report, *The End of the Road*. CPRE believes that budgets must be fully devolved for local authorities to gain true control over an integrated and sustainable transport strategy. We pointed out that many rural areas are already excluded by the city-deal approach to devolution, and require equal attention regarding the provision of public transport and democratic oversight of local transport planning. Finally, we urged the commission to ensure that their roll out of more efficient heating technology is extended to rural communities, which face much higher energy bills and much worse energy efficiency. The fuel poverty crisis is far more striking in rural areas, so targets announced in the Clean Growth Strategy for improving the EPC in fuel poor households must be binding. CPRE will continue to engage with the National Infrastructure Commission ahead of the publication of the final assessment at the end of 2018.

stepbystep

Guide to good campaigning

How to build houses *and* save the countryside

In his new book, CPRE's former chief executive applies the experience of his 12 years in post to show *How to build houses and save the countryside*. Shaun Spiers argues that to drive house building on the scale needed, government must win public support for high quality, affordable developments, in the right locations. Simply imposing development, as recent governments of all political persuasions have attempted, will not work.

Demonstrating why the current model doesn't work, Shaun sets out a number of arguments for planning reform that can be taken up by campaigners around the country. Here are just a few of his key ideas.

1 Meet housing need, not demand

Local authorities should meet housing need, provided that they can do so sustainably and without eroding protected areas. What does 'need' mean? In the UK context, it should mean more than everyone having a roof over their heads. We should aspire to everyone having a decent home at a price they can afford. Those living in good homes should be careful not to deny the same to others. But for all that we should regard decent housing as a 'good', there are other goods, including a beautiful, productive countryside: a countryside we farm, quarry and use for energy and to mitigate or help us adapt to climate change; which we value for nature and recreation; which helps form our national identity; and where many people live.

I have heard even the most implacable countryside campaigners concede that, if necessary, they would sacrifice some countryside, even protected countryside, to provide homes for those in need. But losing countryside to meet housing need is one thing; losing it to satisfy someone's desire for a bigger or a second home or a lucrative investment is quite another. Housing *need* is not the same as *housing demand*.

2 Set realistic targets

'Objectively Assessed Need' should be calculated according to a transparent methodology that distinguishes between need, demand and aspirational growth targets. The housing target should be informed by OAN, but might be lower if this was necessary to protect Green Belt and other designated land. A local authority going for growth might want to exceed OAN, but would not be forced to release more greenfield land or abandon its plan if the growth failed to materialise.

The public sector should ensure that enough affordable homes are built, and work to support the private sector's delivery of the market housing for which there is demand. Local planning should take place in the context of a national spatial plan (see point 6) that seeks to direct economic development to parts of the country most in need, rather than simply stoking growth in the crowded South-East. Under any system, including the current one, local authorities should not just draw up a plan and wait for developers to

deliver it, but should actively promote new housing.

3 Use brownfield first

This does not just mean identifying old factory sites or disused public land; it also means carrying out full urban capacity studies to identify potential sites, including small sites. It means being imaginative about the redevelopment potential of town centres, which waste space on surface car parks and single-story shopping centres. I am fully behind those who want to protect the Green Belt around their towns, but many more people could live in the town centres, which could be improved by careful densification. Now, the Government has signalled a greater willingness to intervene in the housing market. It should seize the opportunity to reboot the urban agenda and promote compact, low-carbon developments.

4 Legitimise the planning process

When decisions are taken on land use, some people are bound to be disappointed. But planning at least provides a structure for those decisions, and allows for public influence. It explicitly seeks to serve the public interest, a noble aim. If planning has a propensity to disappoint, non-planning would provide greater disappointment to more people.

If the public is losing belief in planning, the solution is not to depoliticise it by making it more responsive to market signals or putting 'experts' in charge. You can no more take politics out of planning than



This view of Ludlow in Shropshire illustrates the importance of compact development and access to green space.

you can make politics non-political. Part of the solution is to engage more people and get their buy-in. Neighbourhood planning is a good way of doing this, provided that neighbourhood plans are respected. If strengthened, neighbourhood planning is the best way to engage large numbers of people in the planning process.

Local authorities should be allowed to borrow to build and the Government should increase its funding for housing associations. Rural areas, in particular, need social housing that is affordable in perpetuity. The Government should redouble its efforts to support small builders and custom building.

5 Improve the quality of housing and the Green Belt

Local authorities in theory have the power to turn down poor quality developments; the Government and the Planning Inspectorate should encourage them to use it. The Commission on Architecture and the Built Environment (CABE) should be brought back, or some other body to encourage quality design and place making created. If Government schemes such as the New Homes Bonus and Help

to Buy must continue, payments should be restricted to brownfield developments or developments of the very highest quality on greenfield land.

The Green Belt is worth protecting whether or not it is green. But it is easier to defend if it serves a strong recreational and environmental purpose. We should devote part of a new post-Common Agricultural Policy land support policy to improving the quality of countryside closest to where the mass of the population lives, notably, the Green Belt.

6 Plan strategically

Planning should be about place making, sustainable transport, enhancing nature, tackling climate change and many other good things. The current system generally fails to deliver these things. It even fails in its principal aim: delivering high numbers of new homes. It needs reform. At the same time, local government must be strengthened and given the resources to plan positively. The duty on local authorities to cooperate with their neighbours has not been a success. We need some sort of strategic planning, along the lines of the old county

structure plans, or even regional planning.

However, there is also a role for national planning: a national land-use strategy and, sitting alongside it, a national spatial plan. There is vast potential for regenerating towns and cities, including in the rich South-East. There is still a good deal of untapped potential even in London. But there may also be a case for new settlements and large-scale urban extensions. They could house large numbers of people sustainably and, with the right policy framework, be built to exemplary standards of design and sustainability. They would certainly be much preferable to the sort of 'plonking' of new estates in the countryside by towns and villages that we now see. The process of developing a thorough national spatial plan would help us determine the need for new settlements, and where they should go.

Find out more: *How to build homes and save the countryside* is published by Policy Press, and is available at half price (£4.99) to Fieldwork readers who order before the end of April 2018. Simply quote the code POCPRE50 when checking out at: www.policypress.co.uk/how-to-build-houses-and-save-the-countryside

Current issues

Somerset's best landscapes

CPRE Somerset have been very proud to sponsor a new prize for the best landscape painting in the Bruton Art Society exhibition which Chris Lewis, the branch chair, presented in person at a packed private view in August. The prize will be awarded annually and will help to raise awareness of CPRE Somerset and the county's vulnerable landscapes. This year produced two winners – Coastal Path by Tessa McIntyre and The Road to Blackford by John Chick – which Chris described as 'hugely different in style but equally striking'. He hopes the prize will 'help us all to realise how Somerset's wonderful and varied landscapes are seen and cherished through different eyes.'

Celebrating hedgerows

CPRE East Yorkshire's latest amateur photography awards put hedgerows centre stage, with the top three places all featuring these living landmarks – including winner Peter Boyes' lovely view of the 'Soolands' track south of Kilham. The awards were presented at The Gallery, Bridlington Spa last October, with the photographs providing a stunning portrayal of the unique environment of the beautiful Yorkshire Wolds. Among the guests at this year's event were the Mayor and Mayoress of Bridlington, guests from the Bridlington Civic Society and CPRE members. CPRE East Yorkshire Branch Chairman Chris Lefevre opened the event and each of the winners spoke a few words about the stories behind the photographs. The presentation was followed by Stephen Robinson from Heywoods who gave an illustrated talk on the Trees and Hedgerows of East Yorkshire.

Ox-Cam expressway

Watlington Parish Council has given its backing to CPRE Oxfordshire's campaign against the proposed 'expressway' to link Oxford and Cambridge. The branch has argued that the environmental impacts of the road corridor cannot be justified, being linked to proposals for a million homes along the route by 2050 – 300,000 of which could be in Oxfordshire. From the M4 to Milton Keynes, Highways England is considering an option to build a completely new road leaving the A34 and heading East, somewhere between Didcot and Kennington, before turning towards Thame and Aylesbury. This would be a totally new road through open countryside that is largely Green Belt. CPRE Oxfordshire has called for the National Infrastructure Commission to prioritise a new East-West rail link instead, which could provide a more sustainable solution to local transport requirements.

Parish Green Belt battle

CPRE Hertfordshire is supporting Kings Langley Parish Council in their campaign to stop development on Green Belt land and prevent de-designation of Green Belt in the village. The branch has published a message from parish councillor Sandra Jackson on their website, promoting a petition to halt the coalescence of Kings Langley with Watford and Hemel Hempstead, and the resulting permanent loss of character. The petition currently has 2,000 signatures and the parish council is working hard to prevent proposed new developments on four Green Belt sites within the village boundary. The proposals could also mean the loss of one of the last remaining dairy farms in Hertfordshire, along with the fields, trees and wildlife valued by local people.

PARISHbeat

Effective solutions for your parish

Saving local heritage

CPRE Northumberland has been supporting Birtley Parish Council, near Wark in the North Tyne valley, in their efforts to safeguard the setting of the village Manor House, a handsome listed building with origins dating back to the 1670s.

In 2016 a proposal to build two dwellings in a back garden abutting the Manor House was presented to Northumberland County Council. The development would have impacted on the setting of the listed building and looked out of place in relation to the rest of the village. Alerted by local resident Kristen McCluskie, the Acting Chair of CPRE Northumberland at that

time, the late Professor Howard Elcock, made a site visit and decided to object to the proposal in support of local people who felt that the buildings would not be serving any local need and would harm the character of the village. Shortly afterwards, the application was withdrawn.

Recently the branch was again informed by Kristen that another application had been submitted, this time for one dwelling only. Branch treasurer, Les Ashworth, responded with a further objection in support, again, of local people, including the Parish Council. Despite the council planning officer's recommendation in favour of the building, the Tynedale Local

Area Committee rejected the application, citing as reasons their view that the village, by virtue of its remoteness was 'an unsustainable and inappropriate location for new housing'. The committee also ruled that that the development 'would harm the setting of the adjacent Grade II listed building at Manor House', and 'be an inappropriate form of backland development that would result in harm to the character and appearance of the site and surrounding area'. CPRE Northumberland praised the decision for the 'independence of mind' and 'sympathy for the cherished character of traditional village life' shown by the committee.

Poultry units withdrawn

A planning application for a massive poultry unit has been withdrawn a day before councillors were to consider it, after a petition of opposition was signed by more than 8,000 people.

The applicant wanted to build 10 poultry buildings, housing over half a million chickens, and associated infrastructure on land north east of Westwood Anaerobic Digestion Plant in Bedford Road, Rushden. The plans attracted huge opposition, including from CPRE Northamptonshire and parish councils from Newton

Bromswold and Chelveston. East Northamptonshire District Council received 1,295 comments on the application, with just two in favour. Ros Bradbury of CPRE Herefordshire used her knowledge of this type of development to support local people with technical and campaigning advice and information.

Before the application was withdrawn, the council's planning officers had recommended refusal 'by virtue of its location, scale, layout and design,' giving rise to 'significant adverse landscape

and visual effects which would be readily appreciated from public rights of way in the locality.' The officers' also pointed out that 'the proposal would not satisfy the ambition of paragraph 17 of the National Planning Policy Framework to recognise 'the intrinsic character and beauty of the countryside.' Campaigners had argued the animals would live in an area equivalent to less than an A4-sized piece of paper, with local MP Peter Bone, saying 'it is no way to treat thinking, feeling creatures.'

Supporting Somerset communities

CPRE Somerset has been supporting parish councils in their struggles to combat inappropriate development in the county.

They joined Burtle Parish Council in objecting to a peat extraction company's application for a variation of its planning condition to allow its building to be used for the

storage and processing of wood products for animal bedding and biomass. The branch argued the unsuitability of the remote, tranquil location - close to several nature reserves and with narrow, unstable road access. The scheme has now been withdrawn. In South Somerset, campaigners celebrated a

great win for local people when the district council refused permission for 26 new houses to be built next to the Fox & Hounds pub in Charlton Adam. The branch had objected, saying the cumulative effect of this and a very recent permission for eight houses would overwhelm this small village.

CAMPAIGNER

Fighting for Kent's countryside



Farthingloe from the Western Heights - saved by CPRE Kent

In her 2017 AGM speech, CPRE President Emma Bridgewater said that 'the most heroic campaign I have heard about all year was CPRE Kent's defence of the Area of Outstanding Natural Beauty (AONB) at Farthingloe Valley'. In light of the subsequent landmark success of that endeavour, we devote the 'Campaigner' page to a celebration of the outstanding work of the CPRE Kent campaigners.

The branch was delighted to find, last November, that it had successfully defended the Appeal Court's decision to quash a planning permission in the Kent Downs AONB near Dover. The branch had been fighting to save this historic landscape since 2013, when Dover District Council approved the building of 521 houses and a 90-apartment retirement village (then the single largest development proposed within an AONB), despite the protected status of the site. The Supreme Court agreed with the Appeal Court that the planning committee at the council did not give legally adequate reasons for granting planning permission for more than 600 homes, which they acknowledged would cause significant harm in a protected landscape.

CPRE Kent Director Hilary Newport said: 'This case is not just important to the people of Dover but for the principles of planning law; AONBs merit the highest possible level of protection.' Kristina Kenworthy of CPRE Kent's solicitors Richard Buxton Environmental and Public Law said: 'The Supreme Court has confirmed that planning is not a special case: the need for transparency and scrutiny means that people are entitled to know what has been decided and why, and if necessary enable effective recourse to the courts. This decision should lead to more rigour, better planning – and less argument.'

The Farthingloe judgement has already had a significant impact, with a High Court decision in February citing it when quashing a planning permission for a 5.5ha holiday destination with 12 lodges and associated buildings inside the AONB at Denisole in Shepway. Councillors had overturned their officer recommendation of refusal (CPRE Kent had also objected), and the High Court case was decided on the basis of insufficient reasons for this, citing CPRE Kent vs Dover.

CPRE Kent were celebrating yet another success before Christmas, defeating an application for 104 homes,

business units and a Scouts hut north of Sandwich Road in the village of Ash. Dover District Council had turned down the scheme, only for Quinn Estates to appeal the decision. At a hearing in December, the planning inspector dismissed the developer's appeal, citing the loss of high-quality agricultural land and the damage the proposed development would cause to the rural setting. Furthermore, the inspector noted that the council was able to demonstrate a five-year supply of housing land.

CPRE Dover District Group was represented at the inquiry, objecting to the planned development – on a site not allocated for housing in the council's Local Plan – noting not only the loss of farmland but also the highways problems it would bring the village. CPRE Dover chairman Derek Wanstall said: 'With the impact of other developments as well, we would effectively be reverting to the time before the Ash bypass was built – the place would grind to a halt with the amount of added traffic.'

On the Farthingloe battle, Emma Bridgewater singled out CPRE Kent chairman Christine Drury for special praise, saying that Christine's 'inspirational' determination 'summed up CPRE's whole ethos', and that 'I am very proud to represent the organisation she so impressively characterises.' As we salute everyone who contributed to these successes, we leave the last word to Christine herself, in the form of her reaction to the Supreme Court decision: 'We will never give up on our countryside. I would like to thank our legal team, our volunteers, our members and everyone who support us in protecting our countryside.'

Current issues

Robin Hood's grave

CPRE West Yorkshire chairman Robert Bamforth has raised national awareness of a major threat to Kirklees Priory's tourism potential. With the alleged resting place of Robin Hood being earmarked by Kirklees Council as the site for a sprawling industrial estate, Robert and other local campaigners have warned that the grass and trees of the site – where the outlaw is said to have died in the care of the Prioress, Elizabeth de Staynton – could disappear under 'a sea' of huge steel warehouses.

'Everyone locally believes that is where Robin Hood died and no one has ever challenged that legend – not even Nottingham,' Robert told the national press. 'The tragedy is this land has not been disturbed for hundreds of years and looks just as it did centuries ago so who knows what has been preserved. If you have a Japanese tourist and you say to them "Robin Hood died here and he shot his arrow over that warehouse" it doesn't quite have the same ring to it.'

Max Rathwell, Chairman of Spen Valley Civic Society, said: 'We know how well preserved the land is because it is still exactly as Charlotte Bronte described it in Chapter 12 of Shirley. It is a treasure island in an industrial landscape and Robin Hood's grave would be a focal point. If this crazy idea goes ahead it will devastate the area. Instead of woodland and meadows and fields of wheat and barley it will just be a sea of monstrous sheds.'

Current issues

Land Value Capture

CPRE recently submitted written evidence to the House of Commons Communities and Local Government Select Committee inquiry into the effectiveness of current land value capture mechanisms. CPRE believes that current failures to capture land value uplift resulting from development consent are disproportionately affecting rural communities. Developer contributions are currently capturing only a small proportion of the land value uplift generated by new development for the benefit of communities. The Centre for Progressive Capitalism estimated that in 2014/15 profits from land developed for housing totalled £12.38bn, whereas only £2.79bn was recouped through existing developer contributions.

The current system is also fragmented. Existing mechanisms are not systematically applied and sometimes duplicate one another. The individual nature of Section 106 agreements can mean they take a long time to negotiate. The Community Infrastructure Levy was designed to be faster and more standardised but many local authorities have yet to implement it. Municipal authorities in Germany and the Netherlands currently make greater use of land assembly and compulsory purchase powers than is usual in the UK.

Comprehensive land value capture could have knock-on benefits in reducing the incentive to speculate in land, making it less attractive to pursue development proposals that do not comply with local policy and to hoard land in the hope of future consent. The massive, and increasing, difference between agricultural land value and the value of developable land should instead be directed towards improving services in rural areas.

INreview

Our perspective on countryside issues

Land promoters

Land promoters persuade landowners to allow them to pursue planning permission on their land for a 20-25% share in the profits once it is sold on for development, without having to bear any risk of investing in land or building a development themselves.

As a result of the lack of risk and the high potential profits, land promoters are able to operate on a 'no win, no fee' basis, which is highly tempting to landowners, especially those who don't have confidence engaging with the planning system.

The only regard land promoters pay to planning constraints, such as protected landscapes and settlement boundaries, is in how to get around them – usually by targeting areas that are unable to demonstrate a five year housing land supply.

In these circumstances, the National Planning Policy Framework (NPPF) prescribes a presumption in favour of sustainable development – the loophole at the heart of this story which, compounded by a vague definition of 'sustainable development', allows promoters to argue that the demand for housing overrides factors such as environmental or community concerns. This loophole in effect encourages land promoters to focus their speculative planning applications on councils that they see as having a weak planning policy framework – as a result of not having a local plan or not being able to demonstrate a five year supply of housing land; the promoters know that they stand a good chance of winning planning appeals in such places.

New evidence: appeals and housing land supply

CPRE undertook analysis of 164 appeal decisions concerning four land promoters, between 1 April 2012 and 31 August 2017. This represents the tip of the iceberg; Gladman alone says it achieves planning permission for more than 10,000 homes a year. Of the cases analysed, 54% were allowed. By comparison, the Planning Inspectorate's statistics show that around one third of all planning appeals are allowed, and for housing proposals the average is slightly less at around 28%.

“The Government must follow through on commitments in the Housing White Paper to reduce the potential for speculative development”

This suggests that promoters' tactics are successful in terms of winning appeals. Promoters overwhelmingly pursued appeals where the relevant local authority's five year housing land supply is insufficient, with 121 of 164 appeals referring to areas without a demonstrable supply. Yet, land promoters do not shy away from targeting land where councils do have robust plans and a demonstrable five year supply, winning nearly a third of such appeals – most commonly after challenging whether the sites allocated for housing are deliverable or realistic.

CPRE's recommendations

The Government sees speculative development as a symptom of not having local plans in place, and to a certain extent condones the practice as a means to encourage councils to produce plans. But in order to reduce the potential for harmful speculative development proposals, the Government must follow through on commitments in the Housing White Paper to reduce the potential for speculative development. Where, as a result of the failure of developers to build-out existing sites or seek permission on sites identified in development plans or brownfield registers, the five year housing land supply for an area dips below the expected level, councils should be given time to remedy the situation.

For example, councils need time to kick-start stalled developments or bring in new operators to promote existing sites before the presumption in favour of sustainable development creates the need to grant planning permission for new sites. If the councils' actions are not successful, then sites for new developments should be identified strategically through an accelerated local plan process, and not on a first-come-first-served basis by speculators.

Ministers must also instruct the Planning Inspectorate that, where a local plan is up to date and a five year housing land supply is reasonably demonstrated, the decision on whether to approve or refuse planning permission should lie solely with the local planning authority. The only exception should be if the proposal in question unequivocally accords with all the relevant policies of the development plan.

QandA

The answers you need

Sustainable development?

Q How far should planning decisions take account of the ability of a village to absorb the pressure of new development. Our village is subject to a residential care development for elderly people and a considerable workforce. We fear that the residents will suffer from the lack of facilities in the village, and that our tiny roads simply will not cope with the cars carrying staff and visitors.

A An inspector recently refused an appeal (APP/H1840/W/17/3167269) for a 'care village' comprising 145 assisted living units near Beckford, a Worcestershire village with an existing population of just 260, because it would be harmful to the social infrastructure of the area.

The application proposed to demolish an existing 'intensive poultry unit', replacing it with 145 assisted living units around a central care building, with associated treatment room, dining area and kitchen, wellness suite, and administration offices. Inspector Kevin Gleeson highlighted a number of serious issues with the proposal, raising particular concerns about the scale of the development. The village, within its clear development boundary, is formed of only 130 dwellings housing around 260 people. The development would have added another 170 residents to its population. Gleeson noted that this would be the largest growth in population yet proposed in Wychavon District Council's development plan, and

would put excessive strain on village services.

Irregular bus services meant that the new residents 'would not easily give up their cars', while staff would also be unacceptably reliant on private car transport. Gleeson also found accessibility of healthcare and medical facilities, particularly important for older people, to be lacking. 'Not only does Beckford lack basic health infrastructure,' he noted, 'but it is not close to any settlement providing a reasonable degree of medical support.' In summing up his decision, Gleeson ruled that the scheme would not provide good access to facilities and services, nor would it encourage the use of sustainable modes of transport. Crucially, he argued it would be disproportionately and harmfully large compared with the existing village of Beckford.

Giving weight to landscape character

Q My community is constantly under threat from inappropriate development, despite being surrounded by a very distinctive landscape that I believe is unique to our area. I'd like our parish council to conduct a Landscape Character Assessment, but am not sure how much weight such documents carry in decision making.

A Landscape Character Assessments (LCA) can help establish a robust evidence base linked to place which can inform a range of decisions, from local plans to appeals. A planning inspector, Nick Palmer, recently gave great weight to an LCA when

dismissing an appeal (APP/V2255/W/17/3172378) by a developer for a scheme of up to 77 homes, business space and a shop in the Kent village of Dunkirk.

Swale Borough Council had turned down the plans by Quinn Estates, and the inspector made the effect of the proposal on the character and appearance of the area, with specific reference to its effect on the landscape, a principal part of his decision. The proposed development would substantially occupy the open space between the built up area of the village and Bossenden Wood. In the 2011 Swale Landscape Character and Biodiversity Appraisal (LCA) the site falls within the Blean Woods West Landscape

Character Area. The LCA describes the undeveloped nature and remoteness of the area and notes that the landscape forms part of one of the most extensive areas of semi-natural woodlands in the south-east of England.

The inspector concluded that the proposal would not accord with the LCA guidelines requiring conservation of wooded fringes and protection of the settings of settlements. He pointed out that Paragraph 109 of the National Planning Policy Framework requires protection and enhancement of valued landscapes, and that the development's benefits would not outweigh the harm to the character and appearance of the area.

Current issues

Herts' rural champions

CPRE Hertfordshire's Rural Living Champions have been recognised at an awards evening in County Hall. The Rural Living Awards scheme aims to highlight efforts made by groups or individuals to improve rural life and enhance the environment in Hertfordshire. The prestigious Peterkin Award went to Ken Newstead for his work in the village of Meesden, near Buntingford. Among his achievements was to persuade BT to allow the village to adopt the redundant phone box into which a defibrillator was later installed. He is also a parish council clerk, a member of the village hall committee, churchwarden and school governor. The Environment Award went to Thrift Cottage Eco House and Smallholding in Burnham Green near Welwyn. The project has turned a two acre site that was once an agriculture monoculture into a haven for wildlife, incorporating a wildflower meadow.

Literary loss in Dorset

Downton Abbey writer Lord Julian Fellowes has spoken out against plans to build a housing estate next to a country manor that inspired author Thomas Hardy. Lord Fellowes, who is president of the Hardy Society, has written to planners to object to the proposed 120 home development that will be on agricultural land just 200 yards from Wolfeton House in Charminster, near Dorchester. The historic house provided inspiration for Hardy's Mayor of Casterbridge novel. As well as about 100 local residents, CPRE Dorset and the Landmark Trust have opposed the plans, while Natural England has expressed its concerns.

Current issues

Homes on our High Streets

More than 90% of MPs think that converting empty spaces above shops could help reverse the current housing shortage, according to research by the Federation of Master Builders (FMB). The survey results also showed that 89% of MPs believe converting empty spaces above shops could boost local growth in their area. Brian Berry, Chief Executive of the FMB, said: 'It is estimated that as many as 300,000 to 400,000 new homes could be created by making use of empty spaces above shops on our high streets. This is space just waiting to be turned into residential accommodation. The report puts councils at the heart of the solution and suggests some practical ways for them to facilitate the development of wasted space above shops. Building new homes is important, but a great deal can also be achieved through making better use of our existing buildings. These sorts of properties would be ideal for young professionals, or young families just starting out, as they benefit from good transport links and are close to shops, bars and restaurants.'

The Federation of Master Builders have also produced recent research with the Local Government Information Unit which found that 80% of smaller builders said that local authorities in their area do not proactively communicate or engage with them. The report recommended that councils establish smaller developer forums, online portals and workshops, and that the Government should consider establishing a pilot 'Small Sites Expert Task Force' to develop best practice and act as a source of expert advice on small sites.

Best practice on brownfield

More homes need to be built in England. With our rate of building still stumbling along – 217,350 new builds in 2016/2017 according to government figures against a 300,000-home target that many commentators say we need to be building – it's clear there is a problem. But it would be a mistake to think this increase has to come at the expense of our countryside, when we have plenty of available brownfield land in our towns and cities that could be regenerated to provide housing.

The Government has been slowly coming round to the real potential of brownfield land in England, but that didn't stop them from publishing a report in 2015 that dismissed CPRE claims that more than one million homes could be built on available brownfield.

Instead, over the past few years, ministers have officially plumped for estimates of between 200,000 homes and 400,000 homes, and dismissed our figures as 'wildly optimistic'. How could our numbers be so different?

Up until recently, we have bumped up against a major barrier to the proper use of our brownfield land: the lack of a systematic way of finding and recording it. CPRE has long called for a national register of brownfield land, and in 2017, the Government published regulations requiring all planning authorities to publish such a register by the end of the year. More than 95% of local planning authorities in England have now published their surveys of available brownfield land, and the data shows that we were right all along.

The State of Brownfield 2018

Our recent analysis of the published registers found suitable brownfield sites (as determined by local councils) for more than one million homes. The 17,656 sites identified by local planning authorities, covering over 28,000 hectares of land, would provide enough land

“Our analysis shows there is a strong relationship between the capacity of brownfield and areas of high housing need”



The use of smaller brownfield sites has revitalised many urban areas, including the Grand Union canal through Milton Keynes.

for a minimum of 1,052,124 homes – this could rise to over 1.1 million once all registers are published, confirming CPRE's previous estimates. Much of this capacity can be redeveloped now. Two thirds of the homes can be delivered in the next five years, representing 60% of our housing need in that time – a significant contribution that must not be overlooked. Yet more homes could be delivered if we used our brownfield land more efficiently. The densities of identified sites are very low, and small increases in density could have a significant effect. Matching the average density of new developments of 37 dwellings per hectare could add 130,000 to the available capacity.

Despite the success of the brownfield registers many, including the Government, insist that the housing capacity is not where most people want to live. Our analysis shows there is a strong relationship between the capacity of brownfield and areas of high housing need. The areas of England identified as having the highest number of potential 'deliverable' homes include London, the North West and the South East with the new registers giving minimum housing estimates of 267,859, 160,785 and 132,263 respectively. In other words, in places where people want to live, work and play. Further results from the analysis show that there is brownfield capacity wherever there is threat to the Green Belt. In a

“We need a strong brownfield first policy that prioritises the redevelopment of urban brownfield with good access to services”



Brownfield sites can deliver even more homes if built at an efficient density.

number of areas that have an extremely high number of sites in the Green Belt proposed for development, particularly in the North West, local authorities have identified enough suitable brownfield land to satisfy up to 12 years' worth of housing need.

Unlocking the potential of brownfield

There is a worrying lack of action to make the most of this available land. More than 600,000 homes of the identified housing capacity do not yet have planning permission, including 150,000 homes that councils think can be built in the next five years. Additionally, the registers do not identify all brownfield opportunities. For example, not all councils have included small sites – sites for fewer than 10 homes. If more registers looked at small sites, we estimate space for another 220,000 homes could be identified.

December research commissioned by CPRE found that local authorities routinely disregard small brownfield sites due to their lack of resources; builders' perceptions that small sites are burdensome or complex; and a lack of transparency in the way that land data is collected, which discourages participation from different

sectors, including the local community. CPRE called for changes to brownfield policy and guidance to encourage the identification of the full range of appropriate brownfield sites for housing, including small sites. We also called on the Government to fulfil its commitment to open up the Land Registry, and urged local authorities to engage more widely to raise the profile of the registers.

There is huge potential for new homes to be delivered on brownfield sites where people want to live, and the upcoming review of the National Planning Policy Framework (NPPF) is a fantastic opportunity for the Government to realise this potential. We need a strong brownfield first policy that prioritises the redevelopment of urban brownfield with good access to services. Any revised NPPF should empower councils to ensure brownfield sites are built out before greenfield sites; this means giving councils the power to refuse permission for greenfield sites where there are suitable, alternative brownfield sites. The Government should also provide effective guidance to local authorities to help them identify all opportunities on previously developed land, not just for housing, but to help build thriving communities across the country.

Current issues

Driving in circles

CPRE London's new report shows how extensive development in London's Green Belt will lead to five million extra car journeys a week. Proponents of building new housing in London's Green Belt often justify it by pointing to easy commuting by rail or tube to London. The rationale used is that it will help alleviate the housing crisis whilst simultaneously providing homes within easy reach of a rail station, and hence commuter access, to central London. But, as the report shows, the majority of trips made to and from these new developments will in fact be made by car. The research shows that developments planned for London's Green Belt will be almost entirely car-dependent, even where developments are within walking or cycling distance from rail stations.

This is in direct opposition to the aspirations of the London Mayor who wants four out of five trips in London to be made by public transport, walking and cycling by 2041. The report recommends that developments around London should be in non-Green Belt locations with sustainable transport options, including adequate public transport, good access on foot or by bike to services and stricter controls over car spaces. The Mayor should work with neighbouring councils to develop strategic transport policies for the wider City Region which reduce the need to travel by car and promote investment in sustainable transport. CPRE London continues to campaign for a compact city with clearly defined urban boundaries, which will allow public transport to operate without the subsidies needed in low density areas.

MATTER of fact

Support for your case

The urbanisation of England

Last year, the Royal Statistical Society gave its 'Statistic Of The Year' title to a figure from the work of Professor Alasdair Rae at the University of Sheffield that uses satellite data to show that just '0.1% of the area of United Kingdom land area is densely built upon'.

The 0.1% figure refers to land that is designated as 'continuous urban fabric' - land that is 80-100% built on. Continuous urban fabric is actually a very rare land use in the UK, blessed as we are with relatively green cities. Suburban areas with lots of parks and large gardens would not register under this measure, but few would argue that these areas are not developed; they're certainly not countryside.

The urban landscape

A more representative picture emerges if you take all of the classifications of urban land, such as roads, rail, airports and other infrastructure (8.8% of England's area), and urban greenspace (which includes gardens, allotments, parks etc, and represents 3.8%). While parkland and gardens provide welcome respite from the city, they are usually unmistakably urban, being surrounded by built development and often scattered with permanent structures and hard surfaces. Taking these classifications together, Professor Rae's study shows that urban, or developed, landscapes take up 12.6% of the land area of England.

Our urban areas are fast expanding, and England's

sprawling cities are eating up our green spaces. According to the Government's land use change statistics, we have lost around 50,000 hectares of previously undeveloped land to development since 2013 - that's an area roughly a third of the size of London. This loss has accelerated in recent years under the National Planning Policy Framework, and the removal of targets to encourage higher density housing and more use of brownfield land.

When the wider trends reveal that England is a rapidly urbanising landscape, we cannot afford to be complacent about building on more of our countryside. Disappointingly, the Government's long-anticipated 25-year Environment Plan does little to address the issue of land loss; in fact it largely glides over it. The plan suggests that undeveloped land is built on each year at 'an average of 17,000 hectares'. What does that figure entail? Without context this rate of change means little to most of us. In terms of all the land in England, at around 133,000 km², or 13.3 million hectares, 17,000 hectares a year feels like relatively little. But, put another way, this means building a new London every decade.

Taken over the 25 year life of the plan itself this means 3-4% of our remaining undeveloped land becoming urbanised in some way. Scroll forward the lifetime - at around 85 years or so - of a person born now and it would mean the doubling

of the developed area of England. Taken as a share of the farmland, the figures we have for the past three years show a loss of over 10,000 hectares each year on average. This too means 1% of our farmland taken every nine years or so, and likely never to be returned to nature. This no doubt will fall mostly on our better farmland around towns and cities, where the pressure to develop is keenest.

The future of England's land use

Graeme Willis, CPRE's senior farming campaigner told *The Times* in December: 'To use land more sustainably, we must start using it more efficiently. This rate of loss cannot be endured without losing huge swathes of our countryside. It is a non-renewable resource. Once built on, it is lost forever.' *The Times* found the current rate of development is more than two-and-a-half times the 25-year average and five times higher than the rate between 2006 and 2011. It reported that from 1989 to 2011, most developments were on brownfield sites. From 2013 to 16, the pendulum swung the other way, with greenfield sites supplying 54 per cent of the land.

Blogging for CPRE, Graeme Willis concluded: 'If the 25-year plan is to deliver on its ambitions and stand the test of time then it should measure up to the challenges and be honest about our choices. Maintaining our precious natural capital can't

"When the wider trends reveal that England is a rapidly urbanising landscape, we cannot afford to be complacent about building on more of our countryside"

just come from gains in what is left, while the area, the physical extent, of nature declines inexorably. There are options to recycle our existing built land better: to reuse empty buildings and derelict places, and to make urban areas multifunctional. Where the balance lies between developed and undeveloped may be a political choice, but it is one we need to be more open about. At what point do we decide the loss of land should come to an end? The Government promises to 'develop a comprehensive set of metrics that we can use to monitor progress'. Let the first one be an indicator of land use: the land that is developed and land that is not, so we can take a small step to putting the 'sustainable' back into 'sustainable development'.