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Fieldwork



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Brownfield potential undermines the case for planning deregulation

CPRE's state of brownfield report for 2020, *Recycling our land*, has found that local authority brownfield registers contain enough land for 1.3 million new homes – and that over half a million of these already have planning permission.

The figures demonstrate that there is already suitable land in the planning system to meet the government's ambition to build 300,000 homes per year for the remainder of this parliament, without putting greenfield sites at risk. This calls into question the controversial plans to deregulate the planning system contained in their planning white paper. Our analysis also demonstrates that the planning system is not slowing building rates, when there is currently planning

permission for over half a million (565,564) units on brownfield land.

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 previously developed land is prioritised for redevelopment instead of building on green spaces and countryside. Such a policy could revitalise our urban areas and provide homes near existing infrastructure (as shown above, in Leeds) while allowing greenfield land to continue to provide accessible open space, wildlife habitats and ecosystem services.

Furthermore, brownfield land is currently a growing resource, with the 1.3 million homes it could currently

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Fieldwork

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Brownfield potential undermines the case for planning deregulation

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accommodate representing an increase of 19% on the 1.077 million figure we reported in our 2019 research. CPRE is calling for the retention and improvement of brownfield registers and the development of a national brownfield map to ensure this capacity continues to grow and is harnessed effectively. To that end, we want to see housing investment funding reformed to encourage the regeneration of the midlands and the north of England, both areas with huge potential to benefit from urban regeneration. Local authorities should also have increased control of the order in which development land is built, so that suitable brownfield sites are prioritised – with an emphasis on affordability and high design standards in subsequent building.

A misdiagnosed problem

CPRE chief executive Crispin Truman commented: 'These figures clearly show that the planning system is not what is ailing our housing market. If there is enough land in the planning system to meet the government's own housing targets, what will an overhaul of the planning system, with rushed and untested changes, really achieve?' One of many politicians who have been quoting CPRE briefings in their statements opposing the government's plans is Isle of Wight MP Bob Seely, who commented on our new research: 'This is important information. It shows that we do not need to be pushing through low-density, greenfield development. I hope that ministers will read this report – brownfield development is better for the environment and less dependent on new infrastructure.'

6 Brownfield is better for the environment and less dependent on new infrastructure. 9

In research released on 1 October, CPRE argued that the government's proposed new housing formula or 'algorithm' will fail to deliver the affordable new homes that communities desperately need. Instead, we showed that the new formula will

allow developers to build hundreds of thousands of poorly located new homes in the countryside threatening locally valued green space and completely undermining government ambitions for urban regeneration. For instance, the proposed system would vastly inflate housing targets in rural areas like Cumbria (178% increase) and the Cotswolds (148%), while decreasing them in urban areas like Manchester (-37%) and Gloucester (-12%).

Scope for compromise

The government's proposals would undoubtedly put a higher number of green field sites under even greater pressure. With a new zonal planning system potentially giving outline permission for all suitable development sites across huge areas of land, and little or no local discretion as to the order in which these sites should be built, it would be almost impossible to prevent developers from cherry-picking green field sites while leaving urban brownfield land unused.

CPRE will continue campaigning for a locally led, democratic planning system that promotes a genuinely 'brownfield first' policy and brings forward more brownfield sites for development. Crispin Truman concluded: 'As things stand, the government's proposed changes will result in a free for all, allowing big housebuilders to build what they like, where they like, and when they like. Now more than ever is it vital that the government listens to local communities.'

We remain hopeful that our messages are getting through, and the day after 46 MPs repeated CPRE arguments against the planning white paper in October's commons debate, the housing minister Robert Jenrick pledged to 'give careful thought' to changing the algorithm. Mr Jenrick said that there was 'scope for compromise on where homes are built' and spoke of the need for 'more investment, more regeneration and renewal' in 'great cities in the midlands and the north.' Read our full state of brownfield 2020 report at cpre.org.uk/resources

Break through

How volunteers are making a difference



A reprieve for Wincheap Water Meadows

CPRE Kent and local community campaigners were celebrating in October, when Canterbury City Council announced its intention to revoke its own planning permission to extend a car park over a water meadow.

Last October, the council approved the highly controversial plans to extend its Wincheap Park & Ride car park on to a large stretch of floodplain next to the River Stour, an area of beautiful and biodiverse green space. To support the Save Wincheap Water Meadows campaign, CPRE Kent called for a judicial review of the decision to construct 228 parking spaces over this local wildlife site in an

area of high landscape value within the designated Stour Valley Green Corridor.

After some fantastic crowdfunding, CPRE Kent's legal challenge was due to be heard in early 2021, on grounds including the failure to carry out an Environmental Impact Assessment and misleading claims that the plans would not have a harmful effect on the landscape. However, the council's decision has pre-empted any judgement and follows Highways England's refusal to sign off a planned slip road, rendering the proposed changes to the park & ride redundant. With campaigners fearing the plans could be revisited in revised form, CPRE Kent continues to monitor the situation.

Restoring a Peak District view

After a ten-year campaign against intrusive pylons spoiling the view of a nationally important landscape, CPRE Peak District and South Yorkshire welcomed Barnsley Metropolitan Borough Council's decision, earlier this year, to approve the National Grid application to remove them.

In the Upper Don Valley at Dunford Bridge, the seven pylons in question are striking vertical intrusions marring the openness of Barnsley's Green Belt and the setting of the Peak District National

Park. Both landscapes will be able to offer so much more natural beauty and tranquillity to residents and visitors, boosting the local tourist economy, once overhead wires covering a distance of 1.8km are replaced by underground cables running beneath the Trans Pennine Trail. The scheme is one of four 'visual impact provision' projects recommended by CPRE and other stakeholders to mitigate the impact of the National Grid network on National Parks and AONBs.

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Restoring our hedgerows

CPRE welcomed the recent announcement of Natural England's Nature Recovery Networks, which we believe could help address the climate emergency while ensuring that local countryside can be enhanced for the benefit of people and wildlife. CPRE chief executive Crispin Truman commented: 'We want to see the planting and restoring of hedgerows centre stage in the Nature Recovery Network. The government has put great emphasis on tree planting in recent years, which is welcome, but we want to see equal ambition in the shape of hedgerows. Not only are they great for wildlife, including hedgehogs, birds and insects, but they are an icon of the English countryside and are invaluable in tackling the climate emergency. The Nature Recovery Network provides a golden opportunity to help increase hedgerow cover by at least 40% by 2050, which will go a long way to reaching our carbon reduction targets.'

The government's objectives for the Nature Recovery Network include improving carbon capture, flood management and pollination, and providing better connected habitats – all of which would be supported by restoring hedgerows. By 2042, the initiative will aim to restore 75% of protected sites to a favourable condition for wildlife, and create or restore 500,000 hectares of additional habitat.

News round-up

Keeping you on top of the latest relevant issues

Rural affordable housing a win-win

As the latest statistics show that homelessness in rural areas had doubled in the past two years, new research from CPRE in partnership with the English Rural housing association and the Rural Services Network has found that investing in affordable rural housing will 'turbocharge' the rural economy.

The number of households categorised as homeless in rural local authorities rose to 19,975 – an increase of 115% from 2017/18. And while it is well known that affordable rural homes create sustainable communities, the new jointly commissioned research, conducted by Pragmatix Advisory, goes further in showing how these homes can help reduce rural disadvantage while boosting the economy. For every 10 new affordable homes built, it found that the economy will be boosted by £1.4 million, supporting 26 jobs and generating £250,000 in tax revenue. When multiplied by the number of affordable homes needed,

this would provide a huge boost to jobs and the economy, saving thousands in council's housing costs and even cutting the government's budget deficit.

However, under the government's major overhaul of the planning system, there could be even fewer genuinely affordable homes delivered. Rural councils predict potential falls of up to 50% in affordable house building if the duty for developers to build affordable homes on small sites is removed for those under 40 or 50 units, (see 'Affordable housing on small sites', page 12). CPRE is urging the government to safeguard rural communities by exempting them from proposals, with chief executive Crispin Truman saying: 'We cannot accept that nine in ten care workers are priced out of rural areas by private rents. Investing in rural social housing now would deliver a boost to rural communities at a time when this is so desperately needed.'

Citizens agree on the need for climate action

The first UK-wide citizens' assembly on climate change published its final report in September, giving a clear indication of the growing public appetite to go further than the government in tackling climate change.

The climate assembly report shows that the public recognises a need for nature-based solutions, supporting initiatives like more tree and hedgerow planting – a central recommendation of our Greener, better, faster climate strategy published in July. We were also encouraged to see the climate assembly report revealing a high demand for affordable and low carbon public transport. This is in stark contrast to the current government plans to spend £27 billion on roads, which we're arguing should be diverted to reconnecting rural communities with better bus and rail options.

Noting that packaging waste has significant carbon implications, 86% of assembly members supported CPRE's campaign for a deposit return system (DRS) for drinks containers – their report's most popular measure for increasing recycling. With some manufacturers pressing the government to water down plans for a comprehensive scheme, we're launching a Litter in lockdown report in December to remind policy makers that an all-in DRS is vital for creating thousands of jobs and promoting the reuse and recycling of our resources within a low carbon economy.

CPRE chief executive Crispin Truman concluded: 'The climate assembly has made it very clear there can be no more avoiding tough choices and that the public are ready. It's critical the government provides leadership now.'



Druridge Bay saved from opencast mining

Back in 2016, Northumberland County Councillors overwhelmingly voted to support Banks Mining's application to extract millions of tonnes of polluting coal from a massive site near the picturesque and tranquil Druridge Bay – a mecca for 'twitchers' thanks to its wealth of migrant bird visitors.

At the public inquiry in 2017, evidence was given on behalf of CPRE North East by 'Pitch' Wilson – the veteran defender of cherished landscapes from opencast workings. The then communities secretary

Sajid Javid overturned the inspector's recommendation and decided against the mine. But Banks called for a judicial review, with the High Court ruling that the decision had to be reviewed by the present secretary of state Robert Jenrick. On 8 September 2020, his office published his decision in a report which came down on the side of protecting the environment, leading Banks to rule out a further appeal – a great victory for all the opponents of what would have been a hugely damaging development.

Banning the burn

Last month saw CPRE join a coalition of environmental organisations calling on the government to ban deliberate burning on peatland.

Together with groups including the National Trust, Friends of the Earth and the Soil Association, we argued a ban would demonstrate climate leadership in the run up to UN climate talks being held in the UK next year. Earlier in October, Daniel Carey-Dawes, marked the start of the peat burning season by pointing out that the practice damages the peat bog mosses that are key to the process of sequestering carbon. He added: 'The government's climate change advisers have called for a 2020 ban on burning and now is the ideal time for the government – in a strong England Peat Strategy – to say how and when it will deliver on this ambition.'

CPRE's August analysis of land use data found that emissions from UK peatland could cancel out all carbon emissions reduction achieved through new and existing forests, unless the government takes action on restoring and rewetting our peatlands. At least 18.5 million tonnes of greenhouse gas emissions, mostly carbon dioxide, are emitted from degraded peatlands every year in the UK – 55% of which is from England, despite it having only a quarter of the UK's peatland area. Based on current government tree planting ambitions (30,000 hectares per year by 2025), an estimated 18.5 million tonnes of carbon dioxide equivalent emissions would be captured through new and existing forests annually, but not before 2050 to 2055. That's why CPRE is arguing that action on emissions from degraded peatland must accompany other natural solutions.

A watershed moment

Following the prime minister's October announcement of increased investment into offshore wind energy, Tom Fyans, campaigns and policy director at CPRE, suggested the plans as 'could be a watershed moment where political will meets decisive action to tackle the climate emergency like the emergency it is.' The prime minister confirmed that offshore wind will produce more than enough electricity to power every home in the country by 2030, based on current electricity usage, boosting the government's previous 30GW target to 40GW.

CPRE believes the government should also be investing in the gold standard of 'renewables done well' – where new investment becomes a cornerstone of local enterprise and jobs, with new schemes supported or owned by local communities and delivering wider benefits to the rural economy. We also believe it is critical that the infrastructure built to bring the energy onshore is delivered as sensitively as possible, and that these new investments must benefit the rural and coastal communities that will host them. By continuing down an ambitious path to net-zero carbon emissions, we believe the UK government will have real leverage to inspire greater international climate action at the COP 26 climate conference next year in Glasgow.

Devon's best churchyard

2020 marked CPRE Devon's third annual search for the churchyard which achieves the best balance between providing tranquillity for people, encouraging biodiversity and benefitting the local community. This year's churches were spread far and wide geographically, with the judges really valuing the number of entries in spite of the restraints imposed on those trying to adhere to management plans and grass cutting regimes. The judges thoroughly enjoyed visiting every entry and thanked the volunteers who look after these wonderful places. As a special mark of appreciation during this difficult year, all those not awarded one of the prestigious oak plaques for winners and runners' up will receive a certificate of merit.

October saw the winner of the 2020 competition announced as St Margaret's Church, Northam, whose churchwarden Cath Ellis said: 'We are thrilled to be this year's winner. We have entered before and received positive feedback, so it's wonderful that the judges recognised all the hard work we have put into improving our churchyard. This space is particularly special to the people of Northam because we do not have a park or a village green. Maintaining it has become a real community effort, with everyone committed to making it a peaceful haven.'

letter from the field

Words from local campaigners



Why I'm a trustee for CPRE

To celebrate national Trustees' Week in November, we asked CPRE Shropshire's chair Connor Furnival how he got involved, and how being a local CPRE trustee can make a difference.

I grew up in Telford, a very urban new town surrounded by the famous Shropshire Hills. When I was younger, I would walk miles to the Wrekin and Lilleshall Hill to sit in peace and exclude myself from life's complications, even if only for a few minutes. I've always considered the countryside as my 'safe place'. I started volunteering in my local community with litter picking, and at the same time became a parish councillor. As a result I became aware of CPRE and instantly fell in love with their ethos, ambitions and history. I was invited to a community hall event where my local CPRE group were giving a talk about their work and after the talk I approached the trustees to offer any help.

Now, as chairman of CPRE Shropshire, I'm liaising with our staff and other trustees day to day, to ensure we are an operational and effective charity and that

our campaigns are focused and beneficial to the countryside. I have loved every minute. I've learned so much about the wider Shropshire landscape history and about planning and environmental solutions to the climate crisis. And I have met some fantastic people along the way who come from all walks of life, from Lords and students to professors and volunteers – who will travel miles to help out the countryside.

The support within the CPRE network is great for everyone involved as we share the values of the charity and even find common ground on our differences. What I dislike is the perception of a minority that CPRE is for the rich and only interested in keeping large estates clear from any sprawling development, when that is not the case. But I would like to see more urban-focused campaigning outside of London, to get people in the midlands communities to connect with the countryside and CPRE more. If they won't come to us initially, we need to go to them.

My advice for anyone thinking of volunteering for CPRE would be even if you feel out of your depth at first, don't let that be a barrier. The support and guidance along the way is so helpful and the things you will learn will open your eyes. It can seem as though no one is listening to our messages, but keep shouting the good work of CPRE from the rooftop because you will get someone's attention, and they'll be thinking of CPRE and the state of the countryside. Goals achieved!



Connor (centre) at a CPRE Shropshire Green Clean

Find out more about volunteering and trustee opportunities at cpre.org.uk/volunteering

Good ideas

Learning from each other



Rural champions

CPRE Gloucestershire's vice chair Richard Lloyd has been out and about for socially-distanced presentations to their 2020 award winners, including the Midcounties Co-op store in Bourton-on-the-Water. The shop (above) has proved a success with the community since opening three years ago, creating jobs and showcasing local produce. Utilising a brownfield site and natural Cotswold walling stone, the building incorporates concealed photovoltaic roof panels, efficient LED

lighting and heat recovery technology.

Richard was also delighted to present an award to mindSCAPE – a project delivered by Artspace Cinderford to connect people with dementia and their carers to the mental and physical health benefits of landscape and nature. The project works through outdoor artwork sessions in the Wye Valley and Forest of Dean, and has helped 2,000 participants increase their wellbeing since 2016. Find out more about the awards scheme at cpreglos.org.uk

Tree Preservation Order protects Piggy Wood

CPRE Berkshire's Bradfield district chairman Edward Golton recently went into action after hearing that ancient woodland in Thatcham, affectionately known as Piggy Wood, was up for auction at short notice.

Knowing that the sale of the woodland more formally known as The Plantation couldn't be prevented, Edward quickly made an application for a Tree Preservation Order (TPO) to protect all the trees on the six-acre site. A TPO can prevent trees being felled immediately as so often happens in such situations when land is

quickly sold. Fortunately, West Berkshire Council's tree officer acted swiftly in response to our concerns, and the concerns of others who had made a similar application, and TPO notices went up the next day. Edward commented: 'CPRE Berkshire fully supports the Thatcham community in the value they place on this woodland and its biodiversity as a green lung in this much developed part of Thatcham. We look forward to the council's continued support in ensuring that future generations have access to this wonderful woodland for generations to come.'

Local shops in lockdown

The latest CPRE Dorset magazine, the Dorset Review, has featured an encouraging report from Rupert Hardy on positive trends for local shops during lockdown – including new openings.

October saw a new village shop set up in the grounds of the Rose & Crown in Longburton. John and Becky Gibbons, who run the pub, started doing takeaway food and helping those who needed shielding during lockdown. This gave them the idea to create a village shop, The Larder, run by Becky, using a shipping container which they clad in wood with shelves made from apple crates. They are selling essentials, locally made food and some luxury items, and have even arranged for a Post Office mobile van to visit once a week too.

Over in Sturminster Marshall, florist Sharon Love has set up outside the Anchor at Shapwick using a converted horse box selling flowers and garden ornaments. CPRE Dorset continue to campaign to support village shops, including by running the Best Dorset Village Shop competition. In further encouraging news, one of the previous winners, Duck's Farm Shop in Portesham, unveiled their new look shop and extended stock range in November. They have added lots of new lines and a dedicated 'Made in Dorset' section, extending their already strong offering to the local area.

Community support for trees

Friends of the Lake District, who represent CPRE in Cumbria, recently made a grant of £5,000 from their Love Your Landscape fund to the Crosby Ravensworth parish tree group. Love your landscape is part of the Friend's Westmorland Dales landscape partnership scheme to promote and sustain the rich hidden heritage of the area. The grant will support this community's work to ensure that trees throughout the parish are saved for future generations.

The parish tree group was created in 2019 following concerns that a number of trees had been lost through clearance and disease – notably ash dieback. Following a major survey of every tree within one-third of the parish area, a team of 30 local volunteers of all ages began planting trees and installing tree protection. In its first year, 1,768 trees were planted, and the new grant will fund a second phase to survey and plant another third of the parish.

'The group was formed by local people who wanted to do something to enhance the landscape and preserve it for future generations rather than for themselves,' said tree group chair Drew Woodward. 'This is a community approach to sustain trees throughout the parish and represents a long term commitment on behalf of all of the volunteers involved.'

step by step

Creating a tree strategy for England

CPRE recently commented on the government's England Tree Strategy (ETS) consultation, setting out the key principles that we believe should underpin the strategy, and drawing attention to areas that we believe have been omitted from the consultation – in particular the importance of hedgerows and a landscape character approach.

1 Protect trees through the planning system

CPRE believes that the planning system is integral to protecting and enhancing existing trees and woodland. We welcomed the updates to the National Planning Policy Framework (NPPF) to protect ancient woodland and trees, yet continued pressures on this habitat suggests greater collaboration is needed between government departments to ensure that other planning policies do not outweigh those designed to protect and enhance nature. Local authority planning departments need more guidance and training to implement these updates, while the final ETS should recognise that the protection of ancient woodland could be undermined if there is ambiguity about permitted development rights.

2 Encourage natural regeneration

We agree with the consultation narrative that allowing more natural regeneration (germination from falling seeds) will help ensure trees and woodlands continue to 'grow vigorously in our future climate and contribute to the mitigation of climate change'. Natural regeneration is a great way to create new woodland that benefits wildlife, enhances landscape character and benefits the local environment. Trees established by regeneration are more likely to be better adapted to local conditions so making them more resilient in the future.

We support the National Association of AONBs' Colchester Declaration pledge that, by 2030, 'at least 36,000ha of new

woodland will have been planted or allowed to regenerate in AONBs.'

3 Support urban and street trees

CPRE supports the consultation proposal to develop ambitious local tree canopy cover targets, and the promotion of urban trees is a good starting point to improve the aesthetics of new and existing settlements. However, using these in isolation will fail to create green infrastructure that delivers for people and nature. Guidance must be provided so that local authorities consider spatial and ecological aspects within localised strategies, for example to ensure native species are prioritised; planting occurs in locations that improve access to nature; and that there is a long-term maintenance plan for newly planted trees.

Existing street trees are also important and do not have enough profile in the ETS consultation, which doesn't acknowledge the context of local authority cuts to arboricultural teams and budgets for replacing trees lost to disease and old age. Community/council partnerships like the Plant your Postcode project in Brighton can raise funds for street trees while promoting their value to local people.

4 Engage communities

CPRE believes that community engagement is vital to the future success of local woodlands, for example by working with community groups to influence decision-making about the management of their local woodland and offering opportunities to participate in its management. CPRE agrees with the aspiration to increase the outreach of Community Forests with schools, building on and expanding the success of Forest Schools. Connecting children and young people to nature and an appreciation of trees and woodlands is integral to the future of both. We strongly support the creation of new Community Forests in areas of greatest need and benefit to people, and for better support to be



© Mitchell Orr/Unsplash

given to those already achieving so much.

Community orchards are increasingly popular as places to engage with nature (while providing opportunities for local food production) and should also be part of the final ETS. And as the consultation mentions, it is important to address the barriers people face to accessing trees and woodlands, especially in places near to where people live. Initiatives such as colour-coded circular walks often found in Forestry England woods, and Miles without Stiles routes in several National Parks, should be expanded to more woodlands.

5 Make trees central to farming and land management

The ETS must be integrated with the design of the government's Environmental Land Management scheme (ELMS), which represents a huge opportunity to deliver more tree planting and woodland, as well as to encourage natural regeneration where suitable. We agree with the ETS consultation paper that there is a need for clearer policy and incentives to support the uptake of agroforestry across England. Trees can be integrated into arable and livestock farming across much of the country, with benefits to overall productivity and efficiency of systems that will increase economic and environmental resilience while enhancing the landscape. The final ETS should also refer to traditional orchards as an important form of agroforestry, to help reverse their decline since the 1950s.

The government has ambitious plans for tree planting but needs to rapidly increase planting for England from current rates of

around 2,000 hectares per year to 10,000 hectares per year by 2025. Agroforestry should contribute trees and area to those targets. It should be explicitly supported by ELMS as one way to increase planting rates by overcoming landowner and manager resistance to loss of productive land to permanent tree cover.

6 Recognise the importance of hedgerows

While the consultation refers to the value of hedgerow trees, there is no mention of the significant contribution hedgerows make to wildlife, landscape, cultural heritage and their role in helping to tackle the climate emergency. The design of the proposed Nature for Climate Fund and Nature Recovery Network Fund, along with ELMS, should include measures to deliver more hedgerows across the nation, but there is a huge opportunity for the ETS to include plans to assist with this.

7 Remember landscape character

CPRE believes that landscape character – what makes an area unique – should be an integral part of a Tree Strategy, yet this is currently omitted in the consultation. We suggest that Natural England's national character area profiles should be used to help identify 'the right place for the right tree'. Landscape and visual impact assessments could also be undertaken at the local level to ensure that any tree planting enhances the landscape and compliments amenity values such as viewpoints.

Find out more: Read our full response to the consultation at cpre.org.uk/resources

Saving hedgerows

Earlier this year, CPRE Bedfordshire joined Pertenhall & Swineshead Parish Council and a local action group in a combined effort to stop a local farm development from destroying around 800 metres of field hedgerow in Swineshead. They called on Mayor Dave Hodgson and Bedford Borough Council to remain true to the principles of the Mayor's June announcement of action to help pollinators – including by increasing the number of hedgerows and trees on council land. The campaigners were therefore delighted when the council refused permission for the removal of all hedgerows specified in the application and issued a retention notice.

CPRE Bedfordshire response to the farmer's application argued the hedgerows were classed as 'important' under the terms of Hedgerow Regulations 1997, and that their removal was contrary to Local Plan 2030 policies designed to ensure that biodiversity is protected and enhanced. They also argued that another local plan policy requires the protection and enhancement of the key landscape features and visual sensitivities of landscape character areas. In this case, within the Risley Clay Farmland character area, the council's landscape strategy is to 'enhance the elements of the landscape which are in declining condition [...] in particular the hedgerows and hedgerow and field trees'.

Stopping airport expansion

With Bristol Airport appealing against a decision to refuse plans to expand from 10 million to 12 million passengers per year, CPRE Avon and Bristol is working with the local Parish Council Airport Association to ensure a strong community voice at the anticipated public inquiry. Our campaigners are also supporting the Stop Bristol Airport campaign group's effort to fund a legal challenge to the airport's appeal. With only a few days left to contribute, and with the rural character of North Somerset at stake, readers can donate via www.crowdjustice.com/case/stop-bristol-airport-expansion

Greener villages

Congratulations to the winners of the CPRE Northern Lincolnshire Environment Awards for 2020. Wroot Parish Council were deserving recipients for their work to boost biodiversity by creating a community orchard and meadow. Situated on a formerly neglected patch of land, the planting of saplings of various blossoming varieties will be followed by the planting of wildflowers. Elsewhere, St Marks Community Group in Amcotts was recognised for its work to establish a bat colony in the village, while Ruth Hilton and Virginia Scatcherd of the South Ferriby Gardening Team were rewarded for their delightful planting.

Parishbeat

Effective solutions for your parish

Promoting panoramic views in West Lancashire

CPRE Lancashire has joined the parish councils of Scarisbrick, Wrightington, Newburgh, and Burscough in opposing plans for a mushroom farm development and associated infrastructure on Grade 1 agricultural land in the open countryside of Scarisbrick.

West Lancashire's District Plan recognises the importance of the area's landscape character, described as 'low undulating land [...] with panoramic views', which CPRE and many local residents feel would be unacceptably diminished by a large, industrial-style building (unprecedented in size within West Lancashire). The low-lying nature of the site means the buildings would be visible from a wide area and have a major impact on the openness of this part of the Green Belt.

CPRE supports local food production, but this development would mean best and most versatile farmland land being covered with hard surfaces to grow the mushrooms within an enclosed environment. The farm is also between two RAMSAR sites (protected, internationally significant sites for wetland birds) which Natural England

has said would be negatively impacted. The site, with its proposed 58-space car park, would be active on a 24-hour basis, with subsequent light pollution and an additional 104 HGV movements per day causing further disturbance for wildlife and local people.

The CPRE objection concluded that attempts should be made to find a more suitable brownfield site for the business. In asking councillors to take into account the cumulative environmental impact on this site, it also urged them to give due weight to the importance of representative parish council objections in accordance with the Localism Act 2011.

Elsewhere in the area, campaigners are hoping that West Lancashire Borough Council may support attempts to overturn a controversial Lancashire County Council decision to raise the profile of a former landfill site at Parbold Hill. The work would block panoramic views of the surrounding countryside, which on a clear day can include the Berwyn Mountains in Wales. CPRE Lancashire has been supporting local residents and the parish council in objecting to the proposals for this popular Green Belt beauty spot.

Maintaining rural character in the Mendips

CPRE Somerset have helped a local community avoid a proposal for 148 houses which, if permitted, would have reduced the important separation between Wells and Wookey Hole.

The site was also on the boundary of the Mendip Hills AONB, with potential long-term impact on its landscape setting and dark night skies. Along with local people and parish councillors, our campaigners were delighted when the plans were rejected as 'unacceptable' earlier this year, with the decision citing the 'detrimental impact' on the city and the adjoining AONB from the inevitable 'loss of rural character'.

The threatened site lay wholly within the parish boundary of St Cuthbert (Out), which since 2011 has seen a 200% increase in the population of its north ward due to new builds. The proposal drew over a hundred objections from the local community, with the parish council saying it would have a 'severe, irreversible impact on the AONB and the overall prospect of Wells' and would 'ruin the visual splendour' of the surrounding area. Elsewhere in the Mendip Hills, CPRE Somerset recently helped to preserve some of the AONB's tranquillity, by successfully objecting to plans to operate heavy machinery for 24 hours a day at Callow Rock Quarry.

Campaigner

Celebrating our latest award winners



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CPRE's national conference in October proved a great chance to come together 'virtually' and celebrate some of the outstanding efforts of our volunteer campaigners.

Geof Murray of CPRE Gloucestershire was one of a select few winners of a prestigious Special Contribution award. A central pillar of the CPRE Stroud committee for 15 years (including six years as chairman), he has amassed a formidable knowledge of the planning system and its intricacies, and did a huge amount of work to protect valuable threatened places within the district. Not least of these was Baxter's Field in Laurie Lee's Slad Valley (above), a location that was the subject of a long-running application by Gladman to build a major housing development. Opposition to this application attracted national – and even international – attention, with Geof's important role praised by CPRE's then president, Sir Andrew Motion, in his 2014 AGM speech.

On his retirement from the chair, Geof continued his valuable work by creating a detailed database of applications in the Cotswolds AONB and their outcomes. CPRE Gloucestershire continues to add to this valuable account as a means of keeping track of how each planning district performs in its duty to protect this wonderful landscape. Geof remains a much-valued member of the committee and a trusted source of planning advice, and his colleagues say that he will be missed acutely following his imminent retirement.

Another Special Contribution winner was Sandy Kennedy – still a key volunteer for CPRE Peak District and South Yorkshire at the venerable age of 87. Sandy began volunteering for CPRE in Sheffield in the mid-1990s and soon joined the group's Land Use Planning Committee as a volunteer. For more than 25 years he has worked in the office for a day a week, as well as giving significant input from home. Throughout this time, Sandy has had a significant influence on the group's involvement in feasibility studies and community engagement on rail, airport and road proposals, and has contributed to many traffic calming or reduction measures in the national park. He has also represented CPRE on the Doncaster Transport Users Group since its inception – working towards a joined up, functional and carbon reducing public transport network.

Most recently, Sandy has been the group's media monitoring officer, keeping colleagues up to date with relevant news from a huge range of print and online media. Keeping his finger on the pulse on health, transport and environmental issues, Sandy is a vocal proponent of the health benefits of active commuting; until very recently he was a keen cyclist, doing an 11-mile round-trip to work two or three times a week. We salute the efforts of Sandy, Geof and all the volunteers who have added so much to CPRE's campaigning around our network.

Super connectors

CPRE's national conference also saw two recipients of a new award category for 'Connecting people and countryside'. Susan Pittman has been a member of CPRE for more than 30 years and secretary of the Sevenoaks District Committee for almost as long. As well as being a successful local planning campaigner, she has helped the committee increase engagement with local amenity groups and parish councils. Susan has also organized successful study days for the public on 'Reading the Landscape' and identifying and protecting ancient hedgerows.

Alex Hills has made a hugely significant contribution to CPRE's work in Kent and beyond, connecting people and countryside in the process. He has re-energised local people and campaign groups in defence of the Green Belt, recruiting enthusiastic local supporters to reform an effective Gravesend campaign. Forging very good relationships with officers and members of Gravesham Borough Council, and with local media, he has provided leadership on lobbying, consultation responses and on the submission to the public inquiry. Alex secured significant improvements for active travel provision in Highways England's plans for improvement to the A2/Bean interchange at the heart of the major Ebbsfleet brownfield development and Bluewater shopping centre.

Riding on the Ryder Cup

CPRE campaigners in Lancashire were disappointed that permission was recently granted for Peel Holding's Hulton Park golf resort development proposals. But, they are delighted that, together with Hulton Estate Area Residents Together (HEART), they managed to achieve a number of successful conditions to improve the construction, design and operation phases of the development. The most significant of which, put forward by CPRE's Dr Des Brennan, restricts any development subject to the Ryder Cup being secured. Not only did the inspector recommend the condition, but the communities secretary Robert Jenrick explicitly accepted it as necessary. It is possible that this condition will effectively stop the development from ever happening. CPRE will work with HEART's local 'eyes and ears' to ensure the restrictive condition is enforced and not a single tree is felled.

At 2019's public inquiry Christopher Gallagher, a historic landscape consultant, evidenced the harm of overlaying an 18-hole golf course on top of the Grade II listed Park and Garden designed by Emes and Webb. Meanwhile, CPRE and HEART's planning expert, Jackie Copley, demonstrated that the development is not in accordance with the adopted Bolton Local Plan, and that it would cause harm the Green Belt.

In review

Our perspective on countryside issues

Affordable housing on small sites

CPRE and Shelter recently headed-up a coalition of organisations who are united in opposition to planning changes that would make it possible for developers to build up to 50 homes without making any contribution to affordable housing.

We argued this cannot be right at a time when social housebuilding has plummeted to its lowest levels for 40 years and when more than one million households languish on social housing waiting lists. Together, we urged ministers to scrap lifting this 'small sites cap' and invest in delivering genuinely affordable quality homes, including homes for social rent, to help people and the economy.

Our joint letter to The Telegraph was also co-signed by representatives from charities including the Wildlife Trusts, Greenpeace UK and Friends Of The Earth. It was sent in the context of analysis from the Local Government Association (LGA) which found that if the duty to build affordable housing on sites of up to 50 homes had been scrapped five years ago, 30,000 fewer affordable homes would have been built. The LGA also warned that such a threshold could encourage developers to 'game the system' by putting forward proposals of 49 or fewer homes on sites which are able to take more. As Shelter's chief executive Polly Neate put it: 'This plan would mean expanding loopholes that allow developers to get away with not building the genuinely affordable homes so many families are crying out for.'

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Supporting smaller builders and affordable homes

CPRE's response to the government's consultation rejects the implication that reducing the delivery of affordable housing is a fair price to pay in the short term for boosting the number of homes built by small and medium-sized enterprise (SME) developers. Indeed, we believe it runs directly counter to the need to prioritise affordable tenures. In particular, there is good reason to believe that the proposal will fail on its own terms – landowners are likely to use the change to increase the prices they charge for development land, with little or none of the supposed cost reductions being passed on to SME builders.

Supplying homes that are affordable to those who need them and enabling SME builders to enter the industry are two separate policy objectives, which are both important. But they are not interchangeable: there is no rational basis for asking, 'How much shortfall in affordable homes shall we sanction in order to support SME developers?' More helpfully, the two objectives could be considered together: by what mechanisms could SME developers be engaged to provide homes that the larger developers will not, especially in affordable tenures?

Without affordable housing, the sustainability of rural communities will deteriorate. These issues apply to many rural areas, both within and outside designated landscapes. Local authorities should be given more power to address them without their hands being tied by proposed changes. CPRE would support the recommendation made by Action for Communities in Rural England (ACRE), that other measures to help SME developers should be introduced that also help boost the supply of rural affordable housing. In particular, providing grant funding for affordable housing on market-led schemes developed by SME builders on sites of less than 40 dwellings.

Q&A

The answers you need

The impact of the housing algorithm

Q How would the government's proposed new method of calculating housing targets using an algorithm be bad for the countryside, urban regeneration and the goal of more affordable homes?

A CPRE's response to the Changes to the planning system consultation argues that the proposed adjustments to the standard method for addressing local housing need go in the wrong direction, are ill-conceived and are impossible for us to support. The proposed new standard method brazenly abandons an evidence-based approach to determining housing need. It takes three entirely separate baselines – existing stock levels, household projections and affordability ratios, and generates a pick-and-mix formula from them to produce a national figure of 300,000 or 337,000 homes per year. No consideration is given to whether, or for how long, the headline national figure will retain any credibility in the face of changing circumstances.

The government has a high-level commitment to support the levelling up of the UK economy. Yet the new methodology pushes the highest rates of growth to where existing demand is highest, which will directly undermine these efforts. The current standard method is already allowing most northern local planning authorities to pursue housing requirement figures significantly higher than the standard method figures on the basis of their growth ambitions. But the new method would simply boost areas already dealing with rapid growth, while reducing the scope for urban areas to benefit from ambitious regeneration schemes.

Applying the new method to a sample of areas across the country, we can see that it tends to work directly against the declared aim to focus on existing urban areas. In Gloucestershire, which overall would see a 46% increase in requirement under the new method, Cotswold District would see a dramatic increase of 148%.

Given that 80% of the district is within the Cotswolds Area of Outstanding Natural Beauty (AONB), where there are comparatively few opportunities for local employment, the only possible consequences of such growth would be large increases in out-commuting and associated increases in house prices, and damage to the characteristics of the AONB. Meanwhile, the City of Gloucester's requirement would reduce by 12%.

This pattern is plainly at odds with the declared aim of government policy, and appears to be principally influenced by the affordability adjustment, which would also direct growth towards locations where housing is already most expensive. In many cases these locations are rural and have environmental constraints, such that the effect of the methodology will be a significant shift in the distribution of housing land, away from urban renewal areas and towards rural, greenfield sites in sensitive landscapes. The declared aim here is 'targeting more homes into areas where they are least affordable'; this is presented as a move to improve affordability, but the proposed approach relies on private sector housebuilders building so many additional homes that the price of their products falls, even though this is self-evidently incompatible with their business model.

CPRE recommends that a commitment to a target for affordable tenures, and a programme of public investment to deliver it, should be the priority. Given the affordable housing shortage and the huge surplus of unbuilt permissions, the nationwide, quantitative need for additional open market housing permissions is likely to be relatively low. This is why, if the government is serious about addressing the problems associated with worsening affordability, especially in high-demand areas – for example key workers being squeezed out of the market – then policy efforts must concentrate explicitly on boosting supply of affordable tenures, not supply as a whole.

Permission in principle

The government's proposed changes to planning also include extending 'permission in principle' (PiP) for suitable smaller sites (of under 10 units) contained in brownfield registers to cover major development. CPRE's response to the consultation argued that the only route to PiP should come through future local plans and neighbourhood plans; it is only through the rigorous checks and balances of democratic plan-making processes that there is any hope of achieving the level of understanding of a site that would maximise the robustness of PiP. We argued that any other route to granting PiP is a direct threat to scrutiny and, thereby, to achieving sustainable development.

Given the huge over-supply of existing permissions, we reminded the government that creating additional consenting routes such as expanding PiP is therefore a distraction from the key challenge, and may in fact further clog up the system with unbuilt permissions. The greater the over-supply of consents, the less control planning authorities have over when any development will actually happen. CPRE also urged the Government to commit to the retention of brownfield land registers, given a stated intention to review their role, as they are beginning to fulfil their role in getting local authorities to proactively identify brownfield land capacity.

Two films with a difference

The North West Film Archive has unearthed a 1976 campaign film made by CPRE Cheshire! The film highlights the beauty of the former Vale Royal district of Cheshire, including Great Budworth and Marbury Country Park. The narrator also highlights problems with derelict buildings, and ‘the largest interloper of them all – the motorway’. CPRE Cheshire is glad that many of the places shown in the film are still relatively picturesque, as evidenced by Great Budworth being chosen as a filming location for the recent ‘War of the Worlds’ series. Take a look at the film via cprecheshire.org.uk, where you can catch up with the rest of the news from the county.

Meanwhile, CPRE Sussex produced a brilliant film to showcase the schemes honoured in its first ever online awards ceremony, held on Zoom in October. Among those to receive top awards at the giant virtual gathering were two village shops which kept going during the first lockdown, a land co-operative in East Sussex and a group of South Downs farmers who are connecting with walkers via a series of unique interactive plaques. A total of 27 CPRE Sussex Countryside Awards were made, along with The Peter Brandon Award for Empowering Communities. Watch the film and find out more at cpresussex.org.uk, where you can also enjoy their brand new hedgerow film.

Campaign spotlight

The future of planning

There are several aspects of the planning system that need to be reviewed and improved, but CPRE believes the planning white paper has identified the wrong problems and proposed the wrong solutions. As a result, it will fail on its own terms; it will fail to address the real problems, and it will result in a dramatic loss of local democratic engagement and scrutiny.

CPRE is keen to work with the planning profession, and with the government, to significantly improve the system and its outcomes – ensuring that it is genuinely democratic, open to all and balances the interests of the environment, communities and the economy. From CPRE’s perspective, the planning system we need should help deliver fair access to life-enhancing countryside and quality green space for everyone; space for nature that can address the climate and biodiversity emergencies; and a sustainable, green recovery and thriving rural economies, supported by affordable housing that maximises the potential of brownfield land. The following summary of our response sets out both our critique of what is proposed, and our suggestions for reforms that are precise, necessary and achievable.

Giving communities a say

We see public involvement in planning as critical to achieving good quality development and protecting and improving the environment. We therefore believe that much greater safeguards and reassurances about public involvement in the planning process are required. The processes for both local plans and planning applications can be made simpler, but the public needs to have meaningful influence at both stages. Citizen assemblies could also

help improve the quality of input to planning consultations.

The government’s white paper proposals will, however, critically weaken the scope for public input, and need to be fundamentally reconsidered. It is not enough for the public to be involved in the shaping of policies; developers and local authorities need to be held accountable to local communities for delivering promised community benefits and well-designed schemes. In any case, a 30-month timescale for plan preparation is likely to be unrealistic and undeliverable, leading to continued problems with ad hoc development in unsuitable locations.

Extending the scope of the nationally significant infrastructure projects (NSIP) regime to fast-track housing is profoundly undemocratic and decisions on large housing schemes must continue to rest with elected local authorities. Local authorities should also be able to use their planning powers to help regenerate town centres post-coronavirus; this must involve being able to annul or remove national permitted development rights where this is needed to help deliver a local vision for the future.



CPRE award-winning homes in Cinderford



Ranmore Common in Surrey relies on strong Green Belt and AONB protections

Safeguarding our environment

A much stronger concept of ‘sustainable development’ needs to inform planning law and policy, including the proposed ‘sustainability test’, with clear links through to the UN’s Sustainable Development Goals. The government also needs to more clearly link its programme of changes to planning with its 25 Year Environment Plan and measures in the Environment Bill for nature recovery areas and biodiversity net gain.

Green Belts provide the countryside next door for 30 million people and are needed more now than ever, but we fear that the white paper will increase pressure to release more Green Belt land for development. The planning system should seek to invest in and enhance countryside near cities in order to provide accessible space for nature, wellbeing and climate mitigation, while encouraging urban regeneration and preventing London growing at the expense of the rest of the country.

Stronger protections are also needed for our nationally designated landscapes – Areas of Outstanding Natural Beauty and National Parks. In particular, AONB bodies should be given a statutory right to be consulted on major development proposals in their area, with their advice fully considered by the local authority when determining a planning application. This could be achieved by making additional resources available to AONBs, so that they can be even stronger champions for these outstanding landscapes. In addition,

we call for better protection of countryside that does not currently have a national designation, but has real value for heritage, farming and nature.

Designed for life

We welcome many of the white paper proposals on design, in particular the proposed new unit in government to promote design quality. But for the proposals to be effective the government needs to do further work to uphold good design through necessary benchmarks – including for internal space standards and walking and cycling access, and enforcement through design codes that can be upheld through planning enforcement powers. Our 2020 research with Place Alliance shows that a particular problem with new build housing schemes is that residents are forced to rely on their cars. The government must give more support for strategic, ‘larger than local’ planning in order to avoid these problems.

On energy efficiency, the white paper sets a target for new homes to be zero carbon by 2050. This does not command public confidence when we know that the 2005 Code for Sustainable Homes set the target of 2016. A more ambitious target – 2030 at the latest – is both needed and perfectly feasible, while local authorities should be given power to set zero carbon targets for new development in local plans.

Find out more: Read our full consultation response at cpre.org.uk/resources

The case against oil

CPRE Surrey and the Weald Action Group have been supporting Sarah Finch’s legal challenge against oil production at Horse Hill, near Horley. Last November, Sarah requested a judicial review of Surrey County Council’s decision to allow 20 years of commercial oil production at Horse Hill on the grounds that the county council failed to consider the direct and indirect greenhouse gas emissions of the project, and the government’s net-zero target for carbon emissions.

After twice being turned down, an appeal judge agreed the grounds were ‘arguable’ and pointed out that an ancillary part of Sarah’s case – that UK national planning policy is not in conformity with EU law – is ‘a point of some importance which ought to be considered at a full hearing.’ Given that many of our environmental regulations will still be based on EU rules after 2020, the case may even influence how UK regulations are interpreted post-Brexit. Successful oil drilling at Horse Hill would fund UKOG’s ambitions for Dunsfold, Arreton and Broadford Bridge, but a win for Sarah would set an important precedent for fossil fuel and other high-carbon-footprint developments across the UK.

The case was due to be heard as Fieldwork went to press, so keep up with the latest at wealdactiongroup.org.uk

Matter of fact

Support for your case

Decarbonising rural transport

Transport accounts for a huge chunk of carbon emissions. It's the UK's biggest single cause of climate change, accounting for a third of the damage. And the future doesn't look good – unlike so many areas, the climate change impact of transport is getting worse, not better. That's why CPRE are calling on the government to take vitally important steps like improving public transport and making it easier to choose walking or cycling over driving.

CPRE submitted a comprehensive response to the government's Decarbonising Transport consultation in August, as part of our work to champion sustainable transport connections for our vision of thriving rural communities. Many of the policies we proposed would deliver enormous co-benefits in improving health, reducing air and water pollution, tackling loneliness and improving access to education; they would also contribute to the 'levelling-up' agenda by supporting thriving communities in every region of the country.

Following a transport hierarchy

The government has committed to spending £27.4 billion over five years for a road investment strategy that is estimated to negate 80% of potential carbon savings from electric vehicles, while investing less than one-fifth of that amount in the far lower carbon modes of cycling and buses. Their Transport Decarbonisation Plan (TDP) should reverse this situation by implementing a functional transport hierarchy to guide future transport investment decisions. The Department for Transport should follow the transport hierarchy to divert funding

away from high carbon modes of travel such as private cars and commercial vehicles, towards sustainable options, with an emphasis on active travel modes such as walking and cycling.

For local transport authorities in rural areas, a mandate to follow a clear transport hierarchy would serve to guide the re-allocation of funding towards local walking and cycling investment plans, with segregated cycleways and safe and pleasant footpaths. Where necessary, car club vehicles which operate on alternative fuels should be supported as an alternative to private cars. Promoting the widespread adoption of e-bikes could also replace many car journeys, especially in rural areas, cutting up to 30 million tonnes of CO₂ per year.

However, it has now been well established that electrification alone will no longer be sufficient to achieve the scale of reductions in transport carbon emissions necessary to meet the obligations of the UN Paris Climate Agreement. Research by the Tyndall Centre suggests that even if all new vehicles are 'ultra-low emission vehicles' by 2035 there will have to be a 58% reduction in car mileage from 2016 levels by that date, in order to keep warming 'well below 2°C' this century.

Reducing the need to travel

We believe the TDP should set out measures for reducing the need to travel, including by reversing the long-term trend of centralisation of key services and facilities that has left rural residents with no choice but to travel many miles to larger conurbations on a day-to-day basis. Between 2000 and 2017 the number of rural Post Offices declined by 31%, and only 65% of rural residents live

within 4km of a GP surgery. Half of the country's rural population now live in areas with the poorest access to services based on minimum travel times. In order to deliver substantial reductions in rural transport carbon emissions it is imperative that the TDP set out a clear plan to make essential services more accessible to rural communities, and more viable within them.

Promoting the widespread adoption of e-bikes could replace many car journeys in rural areas, potentially cutting up to 30 million tonnes of CO₂ per year.

The TDP must also set out clear policies to reduce the need to travel by supporting the trend towards home working that has been fast-tracked by the coronavirus lockdown. The latest ONS figures prior to the restrictions found that 26% of people were working part or all of the time from home, with this figure likely to remain significantly higher after the pandemic. In order to realise the full potential of this change it is essential that the government invests in the necessary infrastructure for comprehensive rural broadband coverage. In 2018 nearly a quarter of premises in rural areas could not access a superfast broadband connection (30mbps).

We look forward to working with the government to ensure these recommendations are adopted, in addition to our Transport Deserts proposals for more and higher quality public transport options to encourage a shift away from private car travel.

Find out more: Read our full submission at cpre.org.uk/resources