



Campaign to Protect  
Rural England  
Standing up for your countryside

# FIELD WORK

## Winter 2018

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## ‘Ox-Cam Arc’ a blow to countryside and democracy

**The government has accepted recommendations from the National Infrastructure Commission (NIC) to develop the Oxford-Cambridge Arc despite no formal public consultation, environmental assessment or parliamentary inquiry having taken place.**

CPRE called the decision ‘a devastating blow for local democracy and the countryside’, after the chancellor’s October Budget statement endorsed the NIC proposals for a million new houses in the Arc by 2050, designed to ‘boost economic growth’. A central element of the Arc is a new ‘Expressway’ – a brand new major road, which is, in effect, a motorway by stealth.

### Growth at all costs

The government announced its preferred corridor for the new expressway between Oxford and Cambridge in September, with the roads minister claiming it would ‘help unlock the commercial development of up to one million new homes’. The Exchequer Secretary to the Treasury, Robert Jenrick, added that ‘the Oxford to Cambridge arc is one of the greatest opportunities for economic growth in Europe’. While CPRE welcomed the minister’s pledge to rule out ‘construction in the area of the Otmoor nature reserve’, we questioned the need for the expressway, and the rationale for rejecting a less damaging route which would have made better use of existing roads.

In the run up to the Budget announcement, CPRE argued that the route would threaten Green Belt countryside (including the landscape setting of Oxford), and compromise ancient woodlands, Sites of Special Scientific Interest and the Chilterns Area of Outstanding Natural Beauty. We pointed out that it would also cross tranquil, unspoilt countryside, threatening important wildlife sites and characterful villages, and called for a full Parliamentary Select Committee Inquiry into the proposals.

Reacting to the chancellor’s speech, Paul Miner, head of strategic plans and devolution at CPRE said: ‘It seems the government remains wedded to its “growth at all costs” approach. Despite clear commitments to new houses and a new road, the government has made only vague statements on housing design and levels of affordable housing, with no assurances that the Arc will be an example of sustainable development. It is imperative that a Strategic Environmental Assessment is conducted. The assessment must look at the impacts of both the proposed one million homes and major new road on the countryside, people’s health and well-being, and climate change in a holistic manner.’

### The scale of the threat

Attempts to build one million new homes between Oxford, Milton Keynes and Cambridge will encourage a population

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## FIELDWORK

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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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to countryside and  
democracy

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increase of over 1.9 million people, and would result in an area of countryside greater than the size of Birmingham being lost to development. According to CPRE’s analysis, there are 230,000 homes currently proposed or being built within the Arc, so in order to achieve the NIC’s target an increase of 330% would be required. As there is capacity for just under 50,000 houses on previously developed, or brownfield, land within the Arc, the vast majority of these new homes would be built on areas of open countryside.

Based on the average density of housing developments currently being built within the Arc, CPRE has identified that 27,000 hectares of greenfield farmland and woodland – an area the size of Birmingham – could be lost to development. Paul Miner, continued: ‘This development will change the face of England’s countryside forever. Despite costing at least £5.5 billion in public money, there has been no formal public consultation around developing the Arc. The lack of debate equates to a major, and troubling, democratic deficit at the heart of the proposals. Critically, we need much stronger commitments to protecting and improving the unique and precious rural landscapes in the Arc.’

“This development  
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forever, despite there  
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consultation”

The Arc is adjacent to the Chilterns, one of the most water-stressed districts of England, encompassing multiple areas of Green Belt. More widely, the countryside of the Arc is likely to become a more precious resource as current agricultural land in southern Europe becomes more difficult to farm as a result of climate change. The Expressway will have a number of damaging environmental impacts. CPRE has shown that the building of new roads damages large areas of landscape in their own right, and increases overall levels of traffic in the areas in which they are built. As currently proposed, the road appears to be a motorway by stealth, with a series of grade-separated junctions. Highways England has stated that roads designated as ‘expressways’ should be capable of being upgraded to motorway status in future. The increase in traffic associated with the new road, and the development

“There is no meaningful  
commitment from the  
government to maintain or  
improve the Arc’s existing  
environmental assets”

planned in its wake, is in turn likely to increase air pollution if the new housing estates are geared around road access.

## Landscapes at risk

Cambridge and Oxford are well known historic cities with a substantial number of conservation areas and listed buildings. But there is also a wealth of history in the land between the two. Historic England has also shown that historic assets in the Arc range from 205 scheduled monuments (only 15 of these being within the cities of Oxford and Cambridge combined); 144 conservation areas (29 in Oxford and Cambridge), 7,321 listed buildings (1,990 in Oxford and Cambridge); 48 historic parks and gardens and the Blenheim Palace World Heritage Site.

The National Character Area profiles produced by Natural England give further insight into the issues and opportunities that CPRE believes should be addressed in the future management of land in each area. Development is likely (based on the preferred Expressway corridor) to affect four Character Areas in particular: the Bedfordshire and Cambridgeshire Claylands and Vales, the Bedfordshire Greensand Ridge, the Midvale Ridge and the Upper Thames Clay Vales. Recurring themes for consideration in these landscapes include the need to protect farmed countryside, wildlife habitats, tranquil areas, open views and landscape features like orchards and hedgerows. So far, there is no meaningful commitment from the government either to maintain or improve the Arc’s existing environmental assets while the proposed growth programme is built out.

CPRE continues to question whether this level of development can be justified in an area that is already attractive to employers and has a buoyant housing market. Any development in the Arc must be go through the proper planning process, with local involvement and commitments to affordable housing, high quality design, environmental protection and improvement. It must also be built around improvements to public transport, not a new road which will lock in carbon emissions, air pollution and car-dependency for decades to come. CPRE proposes that the £3.5 billion earmarked to build the expressway alone would be better invested in more sustainable initiatives like the restoration of East-West Rail.

**Find out more:** Follow local CPRE updates at [cpreoxon.org.uk](http://cpreoxon.org.uk), [cprebeds.org.uk](http://cprebeds.org.uk), [cprecambs.org.uk](http://cprecambs.org.uk) and [cprebucks.org.uk](http://cprebucks.org.uk)

## BREAKthrough

How our work is making a difference

## Open views preserved in Northumberland

**CPRE Northumberland were celebrating earlier this year this year, after helping save two valued natural assets in the village of Embleton – a community sitting just a mile inland of Dunstanburgh Castle, in pleasant countryside much-loved by local people.**

Community representatives had informed branch campaigners of two planning applications – one sited between the village and the sea, and another in-filling a field crossed by a popular public footpath. Residents had welcomed other recent housing developments in the village which had provided much needed social housing,

but raised concerns about other new homes being used for holiday lets or not permanently occupied. CPRE Northumberland has long drawn attention to the harmful effects of over-development in the county’s villages, especially where schemes involve large houses with two-car garages located on approach roads, which effectively alter the character of the village by a creeping process of semi-urbanisation. With the new applications posing such a threat, to the detriment of green open spaces, letters of objection were duly lodged by the branch.

Within a few weeks, one application was withdrawn and

the other – on Station Road - sent for decision by the North Northumberland Local Area Council. Councillors agreed with the advice of the Planning Officer and rejected the application as ‘an incursion into open countryside’ which would ‘impact upon the open views over surrounding countryside which are afforded from the site’. Local residents thanked CPRE Northumberland for their support and confirmed that councillors were unanimous in agreeing that the Station Road proposal would have fundamentally changed the landscape character of the village of Embleton.

## Leith Hill safe at last

**CPRE Surrey recently welcomed Environment Secretary Michael Gove’s decision not to renew the licence for Europa Oil & Gas to drill for oil on Leith Hill - in the heart of the Surrey Hills AONB and part of the Metropolitan Green Belt.**

The decision to block oil drilling at the site was made to protect Leith Hill’s precious ancient woodland. Branch Director Andy Smith said: ‘We welcome Michael Gove’s decision and hope this not only stops Europa from ravaging Leith Hill but also leads to the termination of all oil exploration in the Surrey Hills and the Weald. It is disgraceful that Europa ever had permission in the first place to drill at Coldharbour but at least the Environment Secretary’s decision should bring an end at long last to the blighting of the village and the scarring of Leith Hill. Oil drilling should never be permitted in an Area of Outstanding Natural Beauty.’

The decision came after nine years of arduous campaigning by Leith Hill Action Group (LHAG) - supported by CPRE Surrey and CPRE Kent’s Graham Warren, prompting Europa to issue a statement confirming they would be withdrawing their planning application for drilling. Max Rosenberg of the Action Group explained: ‘LHAG has fought to ensure that every condition is met in full and every legal issue is properly observed. However, in the three years since being granted permission to explore for oil at Coldharbour Lane, Europa has failed to fulfil the conditions imposed on them by the Planning Inspector.’ While stressing that LHAG remained vigilant, Max said ‘we would like to express a massive thank-you to everybody who has supported us, not least all our colleagues in CPRE Surrey who have been steadfast in their support for us and their strong opposition to Europa’s plans.’

Fittingly, the decision came in September, during an intensive national campaign by CPRE to highlight new proposals for shale exploration and drilling that would exclude local councils and communities. Back in 2013, CPRE’s *Charter to save our countryside* had attracted support from a prominent defender of Leith Hill, actress and campaigner Virginia McKenna, who summed up the importance of the campaign: ‘The proposed site is right on top of the Surrey Hills Area of Outstanding Natural Beauty – and if you give a place a label like that, it should mean something. Hundreds of lorries would be coming up and down ancient sunken lanes knitted together with tree roots that are totally unsuitable for heavy traffic – but we are told alternative sites or access routes would cost a bit more. What price is an old oak tree that’s been there for hundreds of years?’

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## Current issues

### Regenerating the Thames Estuary

CPRE launched a policy position statement on the future planning of the Thames Estuary in October, representing the combined views of the CPRE Essex, CPRE Kent and CPRE London branches as well as national CPRE. In June 2018 the Thames Estuary Growth Commission recommended that 1 million new homes and 1.3 million new jobs should be created in this area by 2050. The Commission also called for this growth to be serviced by a new road (the Lower Thames Crossing), and for additional rail links alongside the recent development of Crossrail and High Speed 1. However, only about 11% of the Estuary area has statutory protection for nature conservation and important sites for nature outside the Green Belt have been lost to development.

CPRE argues that the landscapes of the Thames Estuary need to be better understood and managed through the planning process. We do not believe that the Commission's recommended level of growth can be achieved without significant environmental damage, both within and beyond the Green Belt, and there are major concerns about potential widespread loss of Best and Most Versatile (BMV) agricultural land. There should be a continued commitment to permanence of the Green Belt designation in line with current policy. Nature conservation interest on brownfield sites should also be properly understood and nurtured as part of the wider ecological network for the Estuary. We believe that the Estuary would benefit from the establishment of a Regional Park along similar lines, and with similar powers, to the authority in the Lee Valley, which adjoins the Estuary to the north west.

# NEWSroundup

Keeping you on top of countryside developments

## Making affordable homes viable

**In March this year CPRE released our *Viable Villages* joint report with Shelter, demonstrating the damaging impact that viability assessments can have on rural communities. In 2015/16, across the eight rural local authorities surveyed, the use of viability assessments led to a 48% drop in affordable homes delivered. So we were pleased to see the strong rhetoric around developer accountability in the draft revised National Planning Policy Framework (NPPF) and accompanying consultation documents published later that month.**

However, we called for significantly more clarity in the wording of the Planning Practice Guidance on Viability, to ensure that viability assessments were carried out across the plan area as a whole at the plan-making stage and avoid placing an unnecessary burden on local authorities. We also argued that the method for establishing benchmark land values for the purposes of viability

assessment should not rely on current inflated land prices, since this approach would 'bake in' the consequences of previous land speculation. We are very pleased to see the new guidance – published alongside the new National Planning Policy Framework in July - clarify that viability should be assessed across the plan area using site typologies, rather than expecting overstretched and under-resourced planning authorities to carry out individual assessments for every site. We hope that this will avoid situations where a local authority sets a 'lowest common denominator' affordable housing target for all developments because of the anticipated difficulty of delivering a minority of complex sites.

Unfortunately there has been less movement on the use of current market evidence to inform benchmark land values. The guidance still instructs local authorities to use this approach to calculate the premium which should be paid to landowners above the existing value of the land. However, it restates

no fewer than four times that 'under no circumstances will the price paid for land be relevant justification for failing to accord with relevant policies in the plan'. It is also very clear that, from now on, it will be the responsibility of the developer to demonstrate what has changed since a local plan was drawn up if they wish to carry out any further viability testing. All in all, this represents a major win for CPRE's campaigning.

But while the new NPPF marks a significant improvement for rural affordable housing delivery, there is still much more to do. The viability loophole may be closed, but the 'affordable homes' built through Section 106 agreements can still be let or sold at up to 80% of market value, far beyond the reach of many low-income rural households. CPRE continues to call on the government to do much more to tackling the lack of affordable housing in the countryside, including by checking rampant land price inflation and supporting the delivery of more homes for social rent.

## Green Clean gleans new evidence

**Throughout September, CPRE held a series of nationwide litter picks to clean up the countryside ahead of the introduction of a deposit return system. We took a mobile reverse vending machine – which collects drinks containers of all materials and sizes – to various Green Clean events across England. Participating volunteers were able to dispose of, and receive 10p for, each of the drinks containers collected, helping people become accustomed to the way that a deposit system works.**

The first Green Clean litter pick in Brigg, Lincolnshire, showed how badly we need an

effective nationwide system. Our small group of volunteers collected 451 bottles and cans in just over an hour – from glass beer bottles to drinks cans and large 3-litre bottles of fizzy pop - and residents queued for their chance to turn litter into cash. In many countries, reverse vending machines are already used by consumers to recycle used drinks containers and reclaim deposits, boosting recycling rates to as high as 97%.

As well as collecting litter, CPRE's Green Cleaners recorded the quantity and type of litter they found (including over 8,000 drinks containers). CPRE will share this data with the government, via its deposit

return consultation, to make sure England gets the best-designed system. However, we fear that other measures - announced in the chancellor's Autumn Budget - did not go far enough to address the damage done to our countryside and oceans by litter and plastic pollution. While welcoming the introduction of a tax on plastic products that do not include sufficient recycled plastic, we expressed disappointment that the chancellor failed to commit to a levy on disposable coffee cups, and urged the government to ensure that the upcoming Waste and Resources Strategy and Packaging Recovery Note reforms will take up this mantle.

## Environmental principles after the EU

**August saw CPRE respond to the government's consultation on Environmental Principles and Governance after the UK leaves the EU. Our response confirmed CPRE's support for the list of environmental principles and rights set out in Section 16(2) of the European Union (Withdrawal) Act 2018, including the principles of 'public participation' and 'the polluter pays'.**

In addition to the existing list, we called for the Environment Bill to incorporate into UK law the 'non-regression principle' - to ensure no diminution of environmental protections after we leave the EU, and the 'progression principle' that policy should seek to continually improve environmental standards. Our response also made the case for adding a principle that 'environmental management should take place at the appropriate spatial and temporal scale'. This would encourage public authorities to consider the competing and related uses

of land, and implement policies that identify opportunities for the enhancement of landscapes.

CPRE's response argued that Environmental Principles must be enshrined in law so that alterations would require parliamentary scrutiny, and welcomed proposals that the Environment Bill would include requirements for public consultation on any future changes.

In reference to the establishment of a new environmental governance body to hold national government to account, we expressed concerns that the proposed requirement 'to balance environmental priorities alongside other national priorities', does not reflect the 'proportionality principle' as currently understood in EU law. Such an approach risks undermining the legal weight of the principles, and encouraging political commitments to development for economic growth at the expense of environmental protection and sustainability.

## State of the Green Belt

**CPRE's annual *State of the Green Belt* report was published in August and highlighted that there are currently 460,000 homes being planned for land that will soon be released from the Green Belt. The report also demonstrated that building on the Green Belt is not solving the affordable housing crisis: in the past year 72% of homes built on greenfield land within the Green Belt were unaffordable by the government's definition, and this is set to rise to 78% as planned homes are built out.**

CPRE warned that the release of land looks set to continue, as one third of local authorities with Green Belt land will find themselves with an increase in housing targets, due to a new method for calculating

housing demand. The London (Metropolitan) Green Belt will be the biggest casualty. There is currently enough brownfield land in England to accommodate more than 1 million homes, and CPRE continues to urge the government and local authorities to ensure that this is redeveloped before any more greenfield land is released from the Green Belt.

Local authorities with Green Belt land have enough brownfield land for over 720,000 homes, the report finds, much of which is in areas with a high need for housing and existing infrastructure. We therefore welcomed the new sequential test in July's revised National Planning Policy Framework, which requires local authorities to 'fully' examine alternative options to Green Belt release – including suitable

Under the proposals outlined in the consultation the new body would not be able to engage with individual planning decisions on a case-by-case basis, so CPRE also called for the new body to have a clear remit to engage with planning decisions which are of a significant or strategic nature. This should include policies proposed under the Nationally Significant Infrastructure Project regime. It should also include other large-scale proposals - such as the OxCam Arc and new towns and cities - where greenfield development poses significant environmental challenges. Finally, CPRE would encourage the watchdog to publish an annual report of cases where principles have been incorrectly applied. If the new body identified consistent failings, they would then be able to initiate a review of existing environmental law and national planning policy to establish if it was fit for purpose, and so advise on future potential changes to policy.

## dates of note

### Carols by Candlelight at St Andrews, Cranford Hall

Celebrate the festive season with CPRE Northamptonshire. *Sunday 9 December 2019 at 4pm. Tickets £20 per person - includes a glass of mulled wine and hot supper.* Enquiries to [Jane.Kimbell@CPRENorthants.org.uk](mailto:Jane.Kimbell@CPRENorthants.org.uk) 01327 830535

### Campaigning To Protect Herefordshire's Countryside

CPRE Herefordshire members and prospective members welcome. *Tuesday 11th December 2018, RVS Centre, Vicarage Road, Hereford, 11am to 1pm.* Please email [admin@cpreherefordshire.org.uk](mailto:admin@cpreherefordshire.org.uk)

### CPRE New Staff and Volunteer Induction Day

Open to any new staff and volunteers who would like to attend from the CPRE network of districts, branches and regions. Induction days focus on the role of National Office and CPRE's overarching structure, ambitions, operations and resources across the organisation. *Tuesday 12th February, CPRE national office, 5-11 Lavington Street, London, SE1 0NZ* Contact Anna Mathieson, [annam@cpre.org.uk](mailto:annam@cpre.org.uk) to book on behalf of yourself or others.

### Magnificent Walk 2019

Friends of the Peak District's annual walk will explore some of Cheshire's finest landscapes. *Saturday 13 April 2019, 8:30 am - 6:00 pm. Tegg's Nose Country Park, Buxton Old Road Macclesfield, Cheshire SK11 0AP* <https://www.friendsofthepeak.org.uk/events/>

## Current issues

### Promoting brownfield in Darlington

A list of potential new housing sites in Darlington which could be developed without eating into the borough's precious countryside has been submitted to the council. The Darlington group of CPRE, hugely concerned that increased housing targets and speculative developers are putting the borough's green spaces at risk, has drawn up the list. CPRE Darlington secretary Gillan Gibson says the group is hoping Darlington Borough Council will follow efforts being made on a national level to push for brownfield sites to be developed before greenfield ones are considered.

Gillan said: 'We were very interested to see the recently published register of brownfield sites in Darlington, and we have suggested several more. Some might remember that it was the redevelopment of several former heavy industrial sites (with the aid of government Derelict Land Reclamation grants) in the '80s and '90s that minimised the need for peripheral growth until recently. We're hoping these further suggestions will help take the pressure off the countryside by having affordable houses built in the right places, rather than executive houses being built into the countryside which destroys green spaces and does not tackle the housing crisis.' The sites include cleared land, car parks and vacant warehouses that are ideal for housing and would help arrest the decay of important locations. The need for urban regeneration is even more urgent in light of draft Darlington Borough Local Plan 2016-36. CPRE Darlington responded to the consultation and raised concerns about the proposed figure for housing supply: Darlington Borough Council is proposing 422 houses a year when the government's standard methodology at that time calculated 177 per year.

# letter from the field



Words from local campaigners

## Hugh Sheppard of CPRE Hampshire's North East District Group writes on the lessons from the campaign to save Odiham Deer Park from an inappropriate housing development.

### Dear reader,

I'm delighted to report success after contributing to a three year fight to prevent housing development in this Conservation Area - a scheduled Local Gap between the villages of Odiham and North Wamborough where nothing has been built for 1,000 years. Planning proposals were refused by Hart District Council on 30 July 2018, backed by a 24-page report setting out eight planning reasons for the delegated decision, including the 'harm to the character, appearance and significance of the heritage assets of Odiham Conservation Area.'

Formerly this was the Little Park of Odiham's once Royal Deer Park, and the importance of such a green lung, criss-crossed by historic footpaths between the local settlements, was not lost on the two parish communities. Neighbour objections outnumbered support for the application by over 400 to 1 and countered the statutory comments of the parish council, which endorsed the seven large houses and infrastructure. Alleged public benefits were proposed, including the introduction of a fenced herd of deer into open pasture, where hedgerows and post-enclosure field structures are un-changed since the area was mapped in 1739. I had co-led a local Save the Park Action Group

and published a 'Heritage of Odiham' digest of background information to supplement evidence of grounds to object.

The Odiham and North Wamborough Neighbourhood Plan had an important influence on the decision, having been adopted in June 2017. In failing to quote any of its specific policies, Odiham Parish Council's comments led to local dissent and directly to an independent parish poll of no confidence, but wider lessons for CPRE arise more from how the NPPF and the Localism Act bear on our countryside. The fact that the area was not being actively farmed - other than with intermittent cattle-grazing and near-feral ponies - diminished any perceived purpose as agricultural land. At 50 hectares, it was also ruled too large for registration as Open Green Space by the Examiner for the Neighbourhood Plan. Although NPPF Planning Practice Guidance describes the Open Green Space designation as 'a way of providing special protection against development for green areas of particular importance to local communities', it is proving unhelpful in protecting areas larger than a few hectares, even where the local community has tabled it for a Neighbourhood Plan and the heritage

importance is recognised by the local planning authority and Historic England.

Another lesson for CPRE campaigners is that under the Localism Act, a Parish or Town Council should work with members of the community to safeguard Conservation Areas and settlement boundaries in a Neighbourhood Plan approved by local referendum. Once adopted by the Local Development Plan, the parish council's statutory comments on applications have the same formal authority in planning terms as those of neighbours. CPRE should also take every opportunity to remind local councils of a democratic obligation to defend their Neighbourhood Plans.

Fortunately in Odiham's case, recognition of the Neighbourhood Plan and NPPF policies by CPRE and Historic England supplemented overwhelming evidence from the community for the LPA's refusal decision. That this was in the face of a plausibly authoritative application of over 1,000 pages demonstrates that community action counts. It also offers another good reason to help protect the countryside by joining CPRE.

Find out more about the campaign and read Hugh's heritage report at <http://www.odihamdeerpark.org.uk/>.

# GOODideas

Learning from each other

## Rewarding positive progress

### CPRE branches have once again been showcasing some of the best rural projects in their counties this autumn.

In CPRE Bedfordshire's latest Living Countryside Awards, ten entrants were awarded the top accolade – a CPRE Mark – including Tiddenfoot Waterside Park (Biodiversity & Landscape Improvement), where over the last few years, the Friends of Tiddenfoot Waterside Park volunteers have reclaimed a 'lost' footpath after 25 years of neglect, begun the protection of lowland acid grassland, and installed a Sand Martin refuge and bird hide. Encouraging and engaging with local groups, the Friends of Tiddenfoot provide a wealth of opportunities for people to relax, learn and enjoy this waterside park. An educational quiz has been even developed for Brownies and local schools.

Also awarded a Mark for Greening Urban Spaces was Incredible Edible, Dunstable, where with the help of Central Bedfordshire and Dunstable Town

Council and local businesses, a team of eight volunteers have turned a junction beside a shopping parade into a thriving community garden. Growing a variety of vegetables, fruit and herbs, with the help of rain water is harvested from a flat roof over one of the shops, the garden also provides a peaceful seating area. There are monthly work sessions where the local community is invited to come and help maintain the garden, harvest the food and enjoy the camaraderie that this social gathering creates.

In Carlton, the judges rewarded Bevistan Dairy with a Mark in the Local Food & Drink category. In order to diversify, the dairy began producing sheep's milk, cheese (smoked and unsmoked) and yoghurt in 2015. Using sheep's milk is still a relatively new idea so they are tapping into a new market, using the fact that it is better for people with a lactose intolerance as a strong selling point. Bevistan Dairy has been inventive and practical in their development

of well-branded products which are sold in local shops, farmers' markets, restaurants and direct to the public.

Meanwhile, in this year's Hampshire Countryside Awards, CPRE Hampshire rewarded the Petersfield Society with first prize in the Community and Voluntary section. Jessica Hughes, one of the judges from Southern Co-op said: 'The Petersfield Society tree strategy, driven solely by volunteers, has touched the whole community and provided a robust and comprehensive view of the environmental, social and economic value the trees of Petersfield contribute to their community. This citizen science initiative has attracted the interest of Westminster and will play an important role in influencing green infrastructure planning within the local council and South Downs National Park. The initiative also provides a valuable blueprint for other communities looking to protect and understand the value of their green assets.'

## Surveying green space

### CPRE London recently published a detailed new survey of Green Belt and Metropolitan Open Land (MOL) within Greater London, describing borough by borough the extent, location and character of this precious green space.

Using analysis undertaken by Greenspace Information for Greater London (GiGL) community interest company, the survey shows how important this land is for nature conservation, especially the protection of ancient woodland. It also outlines the growing pressures facing London's Green Belt and Metropolitan Open Land which is meant to have the highest level of protection from

development in planning policy. The report presents for the first time comprehensive and reliable figures for the location, extent and character of Green Belt and MOL across the whole of Greater London. It reveals that just a few Outer London boroughs are responsible for a significant proportion of Green Belt land, and that the areas of MOL in many Inner London Boroughs are relatively small.

The primary purpose of this research has been to establish a robust baseline to enable the monitoring of changes to these areas on an annual basis. CPRE London is encouraging the GLA and London Boroughs to contribute to this annual

monitoring process by helping to ensure that datasets are kept up-to-date and any anomalies are addressed.

CPRE London has used the report's findings to emphasise that Green Belt and MOL should be taken account of as environmental constraints on housing plans. They called on the Mayor of London to make sure the new London Plan adopts a more proactive approach to preventing the loss of Green Belt land and protecting of Metropolitan Open Land – including by not permitting 'land swaps' unless there are wholly exceptional circumstances and where resulting MOL land is of the same or greater quantity and quality.

### Best village shops

CPRE Dorset was very pleased to continue its sponsorship of this year's Best Village Shop category of the Dorset's Best Village awards – an innovation started by the branch with Dorset Community Action five years ago. The winner of 2018's award was Duck's Farm Shop at Portesham, which only opened two years ago on the site of a derelict garage, located within easy walking distance for residents. It is light and airy with a focus on local foods and a separate café section using local produce. The owners understand the need for community support and run events for residents every month, and have created six full time jobs for locals too. Runner-up, Chapel Lane Stores in Abbotsbury was bought by the current owners only four years ago and expanded and refitted in 2016 when the village postmistress retired. It now incorporates a Post Office counter and has extended the range of products on offer to include local brands.

CPRE Somerset is delighted to be sponsoring a new award for the Best Somerset Village Shop as part of the new Somerset Live Village of the Year Award. The branch wants rural Somerset to be a great place to live and work, with thriving villages and good local amenities. They hope that this new award will encourage people to appreciate the value of our village shops and to support them whenever they can. The new award will champion those outstanding shops in Somerset that really make a difference to their communities and show others what can be done – particularly in terms of providing a focal point for villages and promoting local produce.

**Urban trees in Tyneside**

CPRE Durham has called on South Tyneside Council to confirm the borough's urban trees will not be chopped down as a cost-cutting exercise. Hedges in Cleadon have been brutally cut back, and numerous trees in the borough's streets cut down amid fears that this they may be to save money on maintenance, rather than because they are diseased or dying. CPRE Durham has submitted a Freedom of Information request to the Council which additionally deals with fears that important mature trees could be lost in East Boldon in a drive to 'open up' the village, something vehemently opposed by residents. The removal of trees as a cost-cutting exercise has been pursued most notoriously in Sheffield, where the city council has faced tremendous opposition and Environment Secretary Michael Gove intervened hoping to reverse the trend.

Richard Cowen, chair of CPRE Durham, said: 'Replacing trees with tarmac makes council maintenance of our streets cheaper - but we would urge them to look beyond that, because those trees and associated greenery make such a difference to the quality of life and environment in urban settings. Trees remove pollution and carbon dioxide from the air, provide shade in the heat of summer and add character to townscapes. They improve the quality of life for those living in built-up areas. Diseased and dying trees need to be removed but the suspicion is that, locally and nationally, we could see stealth deforestation of our towns and cities purely as a cost-cutting exercise which would leave our country a sadder and a bleaker place to live.' The government has set a target of planting an extra million trees on urban streets by 2020, but statistics show cities are felling trees instead, with 110,000 mature trees cut down over the last three years.

# stepbystep

Guide to good campaigning

## Saving villages under siege

**A**cross Gloucestershire, as many will be aware, there have been numerous instances where developers have targeted what they see as vulnerable villages and bombarded them with speculative development applications. This has been particularly evident in the foothills of the Cotswolds - areas on the fringes of the AONB but technically outside it. Gotherington, just to the north of Bishops Cleeve, has been a notable example, but where - for the present at least - developers have been kept at bay. But how?

Gotherington is a village with about 1,000 residents. Because it has a number of basic services (shop, schools and playing fields) it is classified as a Service Village in local plans with an informal housing requirement of around 75 dwellings. Development in Gotherington is constrained by merging with Bishop's Cleeve to the south, merging with Woolstone to the north, encroaching on the AONB to the east and joining directly with the A435 to the west. There is little scope for development without significant damage to the landscape and identity of the village. A Neighbourhood Plan for Gotherington was made in July 2017. This Plan makes provision for new developments by means of a number of allocated sites.

Over the past few years, six planning applications have come forward for developments in the range of 10 to 65 dwellings. Developments of 10, 17 and 50 dwellings were broadly in line with the Neighbourhood Plan and have been permitted by the Planning

Committee of Tewkesbury Borough Council. The remaining applications, for 35, 50 and 65 dwellings were refused by the Planning Committee but the applicants went to appeal. Happily, all three appeals have been rejected. CPRE played a significant role in the rejection of two of the appeals and our consultant David Crofts assisted local residents on the third application. Given the success at achieving dismissal of these three appeals it is worthwhile looking at what lessons other villages can learn.

### 1 Get CPRE involved

Planning is a legal process and decisions have to be based on evidence that is against planning policy. CPRE's expertise and the hard work of its consultants are invaluable in the preparation of an effective objection. CPRE Gloucestershire played a very important role in the rejection of an appeal for 65 dwellings on the edge of the AONB at Truman's Farm, through the presentation of considered evidence against planning policy. The Ashmead Drive application for 50 dwellings in the centre of the village went to an appeal hearing in late 2017 at which CPRE's consultant David Croft presented a response on behalf of local residents.

### 2 Emphasise the landscape impact

The Moat Farm application was for 35 dwellings on a site in the centre of the village was rejected at a hearing appeal September 2015. The main

reasons were access to the site and impact on the landscape. The Inspector made particular reference to the "tranquillity" surrounding Thirle Brook which runs to the north of the site and separates Gotherington from Woolstone. He also stated that the 'combination of the area's distinctive landscape and visual qualities, its unique sense of place, and the opportunities for the public to enjoy it, more than adequately justify the area's designation as an SLA. They also warrant treating it as a 'valued' landscape, in terms of NPPF paragraph 109.'

Damage to the landscape was also cited as a decisive issue in the Truman's Farm case, where the site lies within a locally designated Special Landscape Area (SLA) that also protects the setting of the AONB. The Inspector judged that 'by seeking to develop so close to the AONB, and by reducing the SLA to just a relatively thin sliver at this point, the proposed development would have a noticeable and harmful impact on the setting of the AONB as it would appear as an incongruous intrusion into this largely undeveloped edge-of-settlement location.'

### 3 Make the case for social cohesion

The threat to social cohesion was a factor in both the Truman's Farm and Ashmead Drive cases. At Ashmead, the Inspector pointed out that 'the 50 dwellings proposed, on their own, would represent around an 11% increase in the size of Gotherington and, when considered in conjunction with



CPRE Gloucestershire has been keeping an eye out for speculative applications around villages like Painswick

allocated sites and permitted schemes, this would increase to about 31%.' Despite Gotherington being identified as a Service Village expected to take a reasonable amount of new housing, the Inspector shared the concern of the council and residents that the substantial number of new dwellings currently proposed would be hard to assimilate, with no evidence that current facilities would be capable of expansion. He concluded that the development was in conflict with the National Planning Policy Framework (NPPF) by harming 'the vitality and social well-being' of the village.

At Truman's Farm, the Inspector considered the appeal 'in the light of the social role of sustainable development', and concluded: 'Bearing in mind the concerns expressed by both the Council and the Parish Council on this matter, I am not persuaded that the appeal proposal would reflect the community's needs and support its health, social and cultural well-being, or contribute to supporting a strong, vibrant and healthy community, as set out in

paragraph 7 of the NPPF. On balance, the appeal proposal would have an adverse effect on the vitality and social well-being of Gotherington, with this failure to satisfy the social role of sustainable development carrying significant weight against the proposal.'

### 4 Don't damn your case with faint objections

It is tempting to look for every possible reason to object to an application. However, this may well appear as if you are clutching at straws in your endeavour to stop the development. It is better to focus on the issues that are going to be substantive. One argument that didn't work in Gotherington was flooding; if the responsible public authority hasn't objected then it will be extremely difficult to make flooding a decisive issue. And whatever the local view, experience shows that the impact of increased traffic has to be severe before it can be a reason for refusing an application. Nevertheless, it is worthwhile to analyse the

developer's Traffic Statement carefully to identify specific issues such as not taking account of bus route traffic or using out of date statistics.

### 5 Collective action works best

Working together as an action group provides a good focus. It is also easier for CPRE to provide support to an action group rather than a number of individuals. It is well worth getting together with other residents to create a Neighbourhood Plan; having a Plan with allocated sites for housing proved important in both the Truman's Farm and Ashmead Drive appeals. Finally, strength in numbers is as important as ever, and every objection counts. Failure to object implies acceptance and developers are very quick to point out that only a small number of objections were submitted. A large number of objectors also give support to the local planning authority if they are minded to recommend refusal.

With thanks to Eddie McLamon.

## Current issues

### Standing up for Seascapes

Strong objections from CPRE Durham and others convinced South Tyneside Council's planning committee to reject plans for 23 luxury flats in Trow Lea in August. The plans on the former Waters Edge pub site received more than 300 objections during a consultation, and CPRE Durham called the proposal 'totally out of character for this major recreational and wildlife area'. They argued that 'the number and level of conservation designations in this area demonstrates the importance of this area for wildlife, and the mass of the building is totally disproportionate and will dominate the area - from the beach in particular it will be overbearing.' Durham Bird Club also objected, citing proximity to the Northumbria Coast Special Protection Area and the Durham Coast Special Area of Conservation where the preservation of environments suitable for Little Tern, Purple Sandpiper and Turnstone is important.

CPRE Durham chair Richard Cowen, said: 'As an organisation we fight against developments of this type all the time in a bid to protect and preserve the countryside for communities, and the danger is that if one or two sneak through, it can open the floodgates. Developers always want to build executive houses because that brings most profit, but I think there's a growing awareness among communities that once the countryside is gone, it's gone for good. I applaud all those who objected - organisations and individuals - because the council listened and it shows that when opposition is organised it can be effective. Hopefully now this area will continue to be unspoiled and a beautiful stretch of landscape for people to visit and enjoy as they have done for generations.'

# PARISHbeat

Effective solutions for your parish

## Restoring Somerset's signposts

**C**PRE Somerset is delighted to announce that they are able to offer funding to help restore historic signposts close to the Hinkley C power station.

Modern road signage was introduced across England in the 1960s but Somerset was one of just four counties that did not remove their old fingerpost signs. Unfortunately, Somerset County Council no longer has the funds to repair these signposts so they are slowly deteriorating unless local communities are able to take on their maintenance.

That's why CPRE Somerset applied for a grant from the Hinkley C Community Fund and we are happy to say that they have awarded us £5,000 to spend in parishes within a 10 mile radius of Hinkley C within the next 2 years. The branch hopes that they will soon start to see some of these wonderful landmarks restored to their former glory. Funds will be allocated on a first come, first served basis, giving priority to works on fingerposts visible from main roads. Advice and support is available on how to carry out

surveys and assess what works are needed - and volunteers can attend free workshops on highway safety awareness, run by Somerset County Council. The amount of funding is limited and parish councils will be expected to match fund any grant offered. CPRE Somerset will be contacting all parish councils in the project area directly to invite expressions of interest.

**Find out more:** Interested parish councils and volunteers should get in touch as soon as possible at [www.cpresomerset.org.uk/contact-us](http://www.cpresomerset.org.uk/contact-us)

## Celebrating affordable housing

This year's CPRE Gloucestershire Rural Excellence Awards represented a significant celebration of affordable housing in the county. 'At a time when we are seeing wrong houses being built in the wrong places, it is encouraging for us to recognise well designed, well built affordable housing in Gloucestershire,' commented Professor Patricia Broadfoot, Chair of CPRE Gloucestershire. 'These are showcases of housing designed for our young people, young families and communities.'

Six awards were presented

this year and two went to affordable local housing schemes in the Forest of Dean. The first, Kings Lodge in Cinderford, is a development of 92 houses on a brownfield site, originally an abattoir. 32 of the houses are affordable rental properties and five are shared ownership. This development was an excellent example of partnership between the Forest of Dean District Council, the Homes and Communities Agency, Two Rivers Housing and Kier Partnership Homes.

In St Briavels, an award was given to Whittington Close,

where nine affordable homes have been built by another partnership between the district council, the Guinness Partnership, Gloucestershire Rural Housing Partnership and St Briavels Parish Council. 'Without the patience and dedication of the people involved with these partnerships, this kind of housing would not be appearing in our county,' Professor Broadfoot pointed out. 'It is so important that we show our support for this kind of collaboration at a time when our countryside is beleaguered by poor development.'

## Parishes on film

Thanks to an initiative by CPRE Oxfordshire communities throughout the county have been inspired to make a film celebrating their local area and explaining why it needs protecting from development.

Last year, the branch launched a grant scheme to help local people share stories about their rural communities through a series of short films. Each successful community received a grant up to the value

of £500 to make and promote a one-minute film explaining what makes their place such a wonderful place to live. When making their film communities were asked to look at the character, heritage, or landscape that they felt needs protecting.

The first two films have now been produced and launched, with the Society for the Protection of Bampton, in West Oxfordshire, making a film that tells a lively story of how the village has

evolved gradually over the years but is now beginning to change dramatically with the pressure from inappropriate development. Save Culham Green Belt is a committee of Culham Parish Council made up of local residents campaigning to protect a small and ancient Oxfordshire village. **Find out more:** Watch the Culham film can be watched on YouTube at: <https://bit.ly/20Pnx8a> and the Bampton film at: <https://bit.ly/2E85RR5>

# CAMPAIGNER

## Raising CPRE's profile in the North East



Graeme Anderson lining up some social media promotion for CPRE branches in the North East

**A** little over a year ago, CPRE North East engaged the services of Graeme Anderson, a journalist of more than 20 years in the region, to become its part-time Press Officer. Here, Graeme gives a report on what that work has involved.

'I was asked to help raise the profile of CPRE North East - an organisation conscious of its need to be relevant and its need to recruit, also needs to be noticed. And for the past year, that has been my task, to raise the profile of the two branches, CPRE Northumberland and CPRE Durham and its regional umbrella, CPRE North East.

The CPRE NEWSletter is now published four times a year, rather than three, and the extent of its coverage widened to give readers more of an idea of exactly what is happening locally and nationally. We've done it not to waste time and resources but to provide a better, more active service to members, increasing our profile and hopefully attracting greater interest and support.

We've also looked to address our profile in traditional ways through newspaper articles, radio, television, and also in more modern means of

communication like websites, twitter and Facebook. It may be that older members have zero interest in social media but that's where younger audiences overwhelmingly are, and millions of people across the country are on those platforms pretty much every day.

I launched the CPRE North East twitter account in January @CPRENortheast. We already had a CPRE North East Facebook page, and I largely tried to increase the number and types of post on there. It can be found by searching for @cprenortheastregion. In the past year, our Facebook following has trebled and we currently have 364 following the page, although we'll always welcome a few more. Over on twitter, from a standing start, we're now at 310 followers. But those figures tell only part of the story because we have reached literally tens of thousands of people through posts on those platforms.

Two of the best things about social media are that you can get your own message out there directly to the public without it being filtered through the Press, and the analytics which come with the software enable you to see precisely how many people

you are reaching. So for example, our most successful month on twitter so far was December last year when analytics showed more than 54,000 people saw posts from our twitter account! That's 54,000 more people than were hearing the views of CPRE North East a year previously. It's hard, and sometimes inexplicable, to work out what will fly on social media, and sometimes a Facebook post will be unusually popular but the same post on twitter will attract no interest at all, and vice versa.

For example, two of our most popular posts on Facebook, seen and shared by thousands, were simple reminders of upcoming CPRE Northumberland and CPRE Durham meetings! On twitter for our example, our most popular tweet of all? Attracting more than 10,000 views? It said: 'Draft Spatial Plan for Heighinton and Middleton St George is out and currently under consultation. You can view it here.' The really weird thing was that at a meeting of CPRE Darlington beforehand, concern was expressed that no-one seemed interested in the Plan. It just goes to show how you can reach audiences you don't expect on social media.

While the work that continues to be done to keep our campaigns in the traditional media remains vital, it is worth taking comfort in the fact that CPRE North East is now thoroughly modern in the ways in which it spreads its message to the online world. And while fame is not the goal, it's good to know that so much of the good work that CPRE members do in our region is unsung no longer!'

**Share your ideas:** If you have found success with any website or social media strategies, please let us know at [fieldwork@cpre.org.uk](mailto:fieldwork@cpre.org.uk) so that we can pass on the tips in a future issue.

## A new challenge to local democracy?

CPRE Bedfordshire have warned that the government and local authorities in the county have acted together to create yet another QUANGO - 'The Central Growth Board'. The branch fears it will enable them to push through massive developments along the Oxford-Cambridge Arc without the consent of local people, crushing local democracy. Campaigners say the Central Growth Board has been formed to ensure that controversial developments across the local authority areas covered by the South East Midlands Local Enterprise Partnership (SEMLEP) - Bedfordshire, Milton Keynes, Luton, Aylesbury Vale and Northamptonshire plus the rest of Buckinghamshire - are pushed through without debate. Similar Growth Boards are being created in Oxfordshire and Cambridgeshire.

A spokesperson for the branch said: 'CPRE Bedfordshire believes that the work of the new Central Growth Board is already underway with controversial planning applications and projects being pushed through with minimal consultation with the people of Bedfordshire. The expansion of Cranfield Airport to become a major airport for private jets called London Cranfield, with a new runway doubling the number of aircraft movements from 20,000 to 40,000 per year. A proposed new A6-M1 Link Road will slice through the Chilterns Area of Outstanding Natural Beauty and impact historic woodlands. Details of the controversial route of the link road were mysteriously absent from Central Bedfordshire Council's Local Plan 2035 which was presented to government for approval a few months ago. We have written to the council voicing our very serious concerns about the way in which local democracy is being undermined by their actions.'

## Best kept parishes

CPRE Lincolnshire recently announced the winners and runners up in their 2018 Best Kept Village and Small Towns Competition. The 56th year of the competition saw the highest ever number of entrants, with 111 towns and villages competing for titles. The winners included the communities of Harlaxton, Claypole, Kirton, Long Sutton and Holbeach, who each received a plaque and certificate to display proudly within their Village or Small Town. Chairman of CPRE Lincolnshire, Tim Machin, said: 'Standards this year were very high and winners have been validated against their largest ever number of competitors. We are delighted to announce this year's worthy winners and it is great to see so many communities taking such pride in where they live.'

September saw CPRE Lancashire join forces with Samlesbury Area Civic Society and Balderstone Women's Institute to jointly undertake a local litter pick. Unbelievably, in just one hour 50 large refuse bags were filled - a fantastic achievement which saw the branch offer a massive 'thank you' to everyone who rolled up their sleeves and took positive action to make a grot spot into a beauty spot. John Greaves, CPRE Lancashire volunteer said: 'In view of the numbers of people who wanted to help, we have decided to organise other similar events. If you would like to come on board we would love to help you clean up your area. It doesn't have to be just reserved to litter picking. Please let us know how we can make a difference to your local area.'

## Find out more:

Please contact [info@cprelancashire.org.uk](mailto:info@cprelancashire.org.uk) for further details on getting involved in litter picking and other projects in Lancashire.

## Current issues

### Fracking poll

New polling published this summer by CPRE and Friends of the Earth reveals that an overwhelming majority (80%) of Conservative councillors, in areas where fracking companies have a license to drill and explore for gas, believe that planning applications should be required before drilling. The poll was carried out in the wake of the government's announcement that it will be consulting on whether the use of non-hydraulic fracturing in shale gas exploration should be treated as something known as 'permitted development'. This means fracking companies would not have to apply for planning permission.

When asked if local authorities or central government should make the final decision on granting shale production projects, 65% of Conservative councillors said that the local authority should grant final planning consent. Daniel Carey-Dawes, Senior Infrastructure Campaigner at CPRE, said: 'It is clear that the government does not have the backing of its own local councillors for its proposals to fast-track fracking. These plans erode the principles of localism – they diminish local communities' democratic powers and undermine the fundamentals of the local planning system – and councillors recognise this. Unless the significant environmental risks of fracking can be entirely mitigated, exploratory and production plans must be scrutinised to the highest degree – not be made easier. We urge the government to listen to the views of its councillors and drop these plans immediately.'

**Find out more:** Read the latest on CPRE's fracking campaign at [www.cpre.org.uk](http://www.cpre.org.uk)

# INreview

Our perspective on countryside issues

## Countryside Cowboys

**We will work with almost any site to unlock the energy potential of your land. We're unique in that we will look at a range of technologies to create a bespoke solution for your property. We are committed to developing a significant portfolio of back up generation, and consider all land, including brownfield, industrial and agricultural opportunities of all magnitudes for energy development.'**

This invitation appears on the website of Enso Energy, and as 'our average annual payment per MW is over £2,000' it sounds tempting. A Warwickshire farmer was tempted and the result is an application for a Standby Gas Powered Generation Facility.

The application site abuts an old Roman road within some of Warwickshire's most beautiful countryside, so beautiful that it is classified in the Stratford-upon-Avon Local Plan as a Special Landscape Area. Over the road is the West Midlands Green Belt. A Site of Special Scientific Interest, Withycombe Wood, and five other Ancient Woodlands, surviving fragments of the old Forest of Arden, are all within easy walking distance. Two well-conserved nearby settlements, Temple Grafton to the north and Haselor to the south, contain sixty-nine listed buildings between them.

An international football pitch, at its largest, covers 0.82 hectares; this site is 0.93 hectares. On this good quality, agricultural land, will be placed twenty-two chimneys each seven metres high, eleven transformers, a welfare cabin and a control room, the whole

surrounded by a four metre acoustic fence and a 2.4 metre security fence with floodlight/CCTV columns. It would be very, very noticeable, this facility, an offence to the eye, ear and nose, and a danger to the health of wild and human life.

**“The most dangerous and damning result of a permission would be the precedent. If that menace to the countryside happens here, it could happen anywhere.”**

The Applicants disagree. Their Landscaping Supporting Statement and Strategy tells us 'proposed landscape elements will sensitively enhance tree cover with the western hedgerow, utilising species consistent with the existing hedgerow trees and the wider landscape character'; that 'the proposed new hedgerow and tree planting elements which surround the site to the south west will soften views of the proposed generation equipment, assimilating it into the existing landscape'; that 'intervening vegetation will restrict views' from a neighbouring farm; and that north east of the site, 'there will be limited glimpsed views of the site' from a public right of way. 'The landscape effects derived from the proposed development are deemed to be negligible, overall there will be

a small increase in tree cover and hedgerows on site.'

So why did the Applicants not consult the public before submitting their application? And why did the application not contain at least one 3D drawing to show what the proposal would look like?

Come, stop fussing. Besides, the permission is temporary. All the Applicants want to do is put some equipment in a corner of a field for twenty-five years and then take it away, and it will look as if nothing has happened. So what is there to worry about?

The public disagrees; CPRE Warwickshire disagrees. Well over three hundred letters of objection have appeared on the District Council website, many of them written by people with a sound knowledge of the planning system and planning documents. I think this application will be refused.

Suppose it were granted? The most dangerous and damning result of a permission would be the precedent. If that eyesore and menace to the countryside could happen on this site, it could happen almost anywhere. The policies in the planning documents are words, and words can be interpreted rigorously or loosely. So it is not enough for the professional planners to make up their minds. The public should also press for a rigorous interpretation. Happily, on this occasion it has.

By the by, has anyone else been involved in an Enso application? The firm claims to have evaluated 1,200 sites last year so it should be fairly well known. If so, I would like to hear from you.

**Nicholas Butler**  
namb999@btinternet.com

# QandA

The answers you need

## A landmark decision on heritage

**Q I live in a historic village which is currently being threatened by a large housing estate on its outskirts. Surely the need to protect listed heritage assets outweighs housing demand – the genuine need for housing in our parish could be accommodated by a far smaller number of affordable homes.**

**A** CPRE Wiltshire were recently involved in a similar case involving an appeal in South Wiltshire where the Planning Inspector backed the branch's case in dismissing a proposal for 130 houses on the edge of a historic town. In 2017, CPRE Wiltshire objected to an outline planning application by Richborough Estates for 130 houses in a green field outside Mere.

The development would have been fully visible from Mere's iconic ancient monument, Castle Hill, and St Michael's Church. The Monarch's Way footpath crosses the site and would become a tarmac path through a suburban housing estate. CPRE Wiltshire argued strongly that the development would harm the town's historic setting and that of Mere Castle, its scheduled monument. The branch also argued it would breach Wiltshire Council's policies of landscape protection and limiting developments outside town settlement boundaries.

Inspector David Morgan's decision (APP/Y3940/W/17/3182598) eloquently described the importance of the experience of approaching Mere, either

on the Monarch's Way or along the Gillingham Road: 'Both experiences are kinetic in that one is predominantly experienced whilst driving along the road and the other, at a much more measured pace, whilst walking the path. Whilst it may rightly be said that the sensitivity of drivers is necessarily diminished in these circumstances, in this case, one becomes aware of the relationship between countryside and historic settlement through repeated juxtapositions as one travels north along the road. This kinetic experience is significantly amplified when the town is approached from the west along the footpath. Here the prospect of the appeal site before the huddled historic settlement below the eminence of Castle Hill is first perceived as one progresses through an element of the former parkland associated with Zeals House, a highly graded country house to the north.'

The Inspector continued: 'The kinetic experience of the transition between parkland, agrarian pasture and urban settlement is amplified as one crosses the Gillingham Road, and the part played by the appeal site in linking rural settlement to wider landscape revealed. It is a genuinely picturesque scene, and one given added resonance if one stops to consider the possible thoughts of the fugitive Monarch, pausing on the route of his escape, to survey the ruins of the former Royal citadel before him, and reflect on his current vicissitude. Even if such contemplation is not invoked, the visual linkage between the eponymous path and the

former Royal stronghold is made. I am in no doubt that the appeal site, comprising part of the setting of the two designated heritage assets, thus comprises an important part of their significance.'

This significant decision is one of the first under the government's newly revised National Planning Policy Framework (NPPF) and is likely to be cited as a precedent in other appeal hearings. The Inspector confirmed that 'the proposals would fail to conserve the settings of the scheduled ancient monument or the conservation area and would thus be in conflict with paragraph 193 of the Revised Framework' which he added, 'anticipates "great weight" being afforded to the conservation of designated heritage assets' and 'makes clear that the more important the asset, the greater the weight should be given to its conservation.' It was because the heritage policies of the NPPF were 'manifestly breached' that its 'presumption in favour of sustainable development' was not engaged in this case, regardless of the ability of the council to demonstrate a five year supply of housing land.

**Find out more:** Read the decision and other case documents (including CPRE Wiltshire's submissions) at <https://unidoc.wiltshire.gov.uk/UniDoc/Document/Search/DSA,871000>  
Take a look at CPRE Wiltshire's excellent promotional film, and another on housing issues, at [www.cprewiltshire.org.uk](http://www.cprewiltshire.org.uk)

## Current issues

### New model farming?

CPRE welcomed the September publication of the first major Agriculture Bill for 70 years, which will legislate for a new system of 'public money for public goods' to deliver better environmental outcomes and improve the viability of the sector. CPRE have long called for such a system, and made the case for this in our 2016 report *New Model Farming*. The Bill will replace the current subsidy regime for farmers, in which most payments are related to the amount of land owned, with a landmark scheme focused on public benefits and enhancing the countryside. From 2021, payments will begin to be made through a system of environmental management contracts to deliver environmental benefits such as improving soil health and providing habitats for wildlife, and wider contributions such as improving public access to the countryside and protecting distinctive landscape features.

The transition period, which will continue to 2027, will provide welcome stability for farmers, and gives them sufficient time to adjust and adapt. This should mean that farmers are able to change the way they farm to be profitable, reduce their impact on the environment and restore the health of the countryside. Graeme Willis, CPRE's senior rural policy campaigner said: 'Paying farmers for protecting and enhancing our landscapes, soils and countryside is a step in the right direction to restore our environment, produce food more sustainably, and ensure our countryside is thriving and healthy in years to come. It is great to see government support a shift towards rewarding farmers for environmental stewardship, but there must also be measures to reverse the decline in smaller farms.'

## Current issues

### Better on Brownfield

CPRE are pleased to see that previously developed now features much more prominently in the revised National Planning Policy Framework (NPPF), which specifies that substantial weight must now be given to the value of reusing brownfield land. Additionally, the new approach to 'exceptional circumstances' for Green Belt release requires brownfield options to be considered first. There are a few policies which could be used to improve the identification and use of brownfield land. Paragraph 117 includes a requirement for strategic policies to set out how they will meet housing needs in a way that makes as much use as possible of previously developed or brownfield land. This could provide an opening for councils to include a sequential approach within their development plans.

Paragraph 118 recognises a range of different types of brownfield land. From giving 'substantial' weight to the value of using brownfield land within settlements for homes and other identified needs, including opportunities to remediate derelict land, to the promotion of the development of under-utilised land and buildings, such as car parks, or converting space above shops. This could provide an opportunity to have clear policies, and allocate sites that remain in use. The importance of local authorities taking a proactive role in identifying land, including sites for their brownfield registers is also in the revised NPPF (paragraph 119), as recommended by CPRE. We will be pushing for the brownfield land register regulations, and associated guidance to be updated, in light of the NPPF, to reflect the value of brownfield redevelopment.

# The future of the rural economy

**CPRE recently welcomed the opportunity to submit evidence to the House of Lords Select Committee on the Rural Economy as part of our work towards a sustainable future for the English countryside, a vital but undervalued environmental, economic and social asset to the nation.**

The rural economy mirrors that of urban areas in many respects except for the relative importance of the land-based sector, higher rates of home-working and the prevalence of small or micro businesses. Agriculture, forestry and fishing remains the dominant sector in rural hamlets and rural villages but shares this position with professional, scientific & technical services in all rural areas. The land-based sector still represents over 15% of registered businesses in all rural areas. The importance of this sector is however amplified by the important role it plays in supporting other businesses: it provides essential raw materials for industries, such as food processing, and it maintains the beauty, character and diversity

of the countryside upon which recreation, tourism, hotels and catering depend. It also contributes towards creating a high quality environment capable of attracting inward investment and a skilled workforce. With DEFRA data indicating that the number of commercial farm holdings fell by 21.3% from 2005 to 2015, with the preponderant losses on farms below 20 ha, CPRE has been calling for greater support for the smaller farms that underpin so much of the rural economy.

### Improving the affordability of rural housing

Smaller farms and rural businesses rely on workers being able to access the affordable housing that is declining as land prices rise. The granting of residential planning permission typically leads to at least a hundredfold increase in the market value of agricultural land, with the majority of the planning gain flowing to the landowner rather than the community. Successful schemes

built through the rural exception site policy demonstrate how the use of strict planning rules can help to hold down land values and support the development of truly affordable homes. When building an exception site scheme, housing associations usually pay around £10,000 per plot. The government should consider reforming councils' compulsory purchase powers so that local authorities are able to acquire land closer to its existing use value for the development of more genuinely affordable housing schemes.

Current funding mechanisms are not helping to build enough truly affordable rural homes. Partners in the rural housing sector have highlighted to us that, even where they are able to secure land cheaply through the cooperation of willing landowners, they often struggle

**"Policies often have unintended consequences in rural areas"**

to finance affordable housing schemes. Homes England's Affordable Homes Programme, local authority funding, and cross-subsidy all play a part in funding homes for social rent, 'affordable rent' and discounted home ownership, but rural housing associations regularly have to fill funding gaps with money from their own reserves. The government should build on the measures announced in the 2017 budget and lift the Housing Revenue Account borrowing cap for all rural local authorities, so councils can borrow in order to build more social housing. Homes England should also allocate a proportion of its grant funding to rural areas commensurate with the proportion of the population who live in them.

**"Investment in rural economies should be sensitive to the rural environment"**

Finding suitable sites for rural housing developments requires a high level of community engagement and a lot of patience. Partnership working is crucial, and we would like to see more support and encouragement for local authorities to work with landowners, housing associations and community land trusts to bring forward and develop rural exception sites. Policies which are designed with urban areas in mind often have unintended consequences in rural areas. Both the sale of council housing under Right to Buy and the exemption of sites of 10 homes or fewer from on-site affordable housing contributions have affected the availability of homes that rural people can afford to live in. We urge the government to suspend Right to Buy in designated rural areas and allow councils to make on-site affordable housing contributions mandatory on all sites, even those of 10 homes or fewer.



LEPs could help identify suitable areas for large scale woodland creation

### The role of Local Enterprise Partnerships in rural areas

A few LEPs have stated that it is challenging for them to justify smaller rural projects because Government funding often focuses on the ability to deliver large-scale growth. This model of funding allocation assumes that business is driven by cities. CPRE would agree that most large-scale economic development projects, including housing, are best located in urban areas and we advocate a brownfield first approach. We also recognise, however, the need for investment in rural communities and the land-based sector, particularly small and medium-sized farming enterprises, and the need to make affordable housing available to people on average rural incomes or below. There are 102,235 SMEs in farming, forestry and fishing in England - approximately 2% of the national total. We are particularly concerned that investment in rural economies should take place in a manner that is sensitive to the rural environment.

It is therefore particularly worrying for CPRE that there appears to be an uneven recognition amongst LEPs of the importance of the environment and the benefits a good quality natural environment brings to business. Increasingly a thriving natural environment and its associated services are being recognised as essential contributors to sustainable

growth. CPRE groups were aware of about half (52% and 50%, respectively) of LEPs looking to address environmental issues, and working with the relevant Local Nature Partnerships (LNPs) on these issues.

The government's 25 Year Environment Plan proposes the establishment of 'natural capital plans' on a strategic, sub-regional basis across England. The plan envisages that these plans will be produced for the 14 'aligned areas' of England that are used to guide the work of Defra and its agencies including the Environment Agency, Natural England and the Forestry Commission. These plans are thus likely to cover different areas to either LEPs or LNPs. But they have the potential to be the key vehicle for increasing collaborative work between LEPs, LNPs, and the statutory agencies.

A further proposal in the plan would also see LEPs being involved in identifying suitable areas for large scale woodland creation and forestry development zones. Such an approach to land-use planning which identifies multiple opportunities for enhancement - such as forestry, water quality, carbon sequestration and natural flood management - can help support the enhancement of the natural environment, especially in areas where landscapes and biodiversity have been degraded. In addition, such collaborations can encourage innovative local carbon reduction and resource efficiency initiatives, and support small scale energy generation projects in rural areas.

## Current issues

### Sustainable development goals

CPRE submitted evidence to the Environmental Audit Committee Inquiry on UK Progress on the Sustainable Development Goals in September. Our findings showed that, whilst some small steps have been taken by the government in some areas, they have failed to fully integrate the Sustainable Development Goals (SDGs) into plans, policies and their approach to monitoring. A land use strategy for England, following the Scottish government's example, could provide a more appropriate platform for this than is currently afforded by the National Planning Policy Framework (NPPF).

The NPPF, the leading document that should guide sustainable development, does not integrate economic, social and environmental objectives and, critically, does not even mention the SDGs. In particular, the Housing Delivery Test is likely to lead to the loss of valued countryside and place designated land under increased threat, as councils are required to release more land for housing. More encouragingly, proposals for Net environment gain mooted in the 25 year environment plan and subsequently incorporated into the revised NPPF provide a good opportunity to deliver progress towards the SDGs. However, there is also a significant risk that net gain approaches will be used to force through inappropriate development in inappropriate locations. The imbalance in the Ministry of Housing Communities and Local Government's approach to sustainable development is reflected in their Single Department Plan. The delivery of 1 million new homes is top of the list, with the delivery of affordable homes, the leading target within Goal 11, much lower down.



The land-based sector still represents over 15% of registered businesses in rural areas.

# MATTER of fact

Support for your case

## Supporting social housing

**C**CPRE recently welcomed Prime Minister Theresa May's October announcement that the government will scrap the borrowing cap on local authority Housing Revenue Accounts. For far too long, rural councils have been unable to build enough social rented homes to meet local needs, due to lack of funding.

Rural communities desperately need more truly affordable homes and this new borrowing flexibility is a big step in the right direction. CPRE hopes that the government will clarify that councils should use their new revenue raising and spending powers to fund homes for social rent, the only level of rent that is genuinely affordable for low-income households in high demand rural areas. Lois Lane, Research and Policy Adviser at CPRE, said: 'This announcement is welcome news for rural communities in particular, who have long required a step change in the delivery of social housing. There are currently more than 191,000 households on rural local authority waiting lists, but last year only 990 new homes for social rent were built in those areas. At that rate it would take 190 years just to meet the backlog. Rural councils should take advantage of the change and start building more of the truly affordable homes the countryside needs to thrive.'

### Radical reform

While this is a positive step forward, the land required by councils to be able to provide

this much needed social housing comes with a hefty price tag. CPRE are calling for radical reform to the way in which we buy and sell land so that councils are able to afford the land required to build the affordable housing local communities need. Such a reform could also see huge improvements to local green spaces, public services and infrastructure.

In September, CPRE had welcomed the government's commitment to providing more long term funding for housing associations. However, it questions whether rural communities will receive their fair share, and whether the spending announced by the Prime Minister would actually represent an increase in funding for social housing in real terms after 2021. £2 billion of 'new money' will be made available to housing associations up to 2028/29 for the building of social homes and to help ease the housing crisis. However, it is not yet clear where these funds will come from, as no breakdown of the figures has been shared and the budget for this period is yet to be drawn up.

CPRE is concerned that despite warm words there is no guarantee that this money will actually represent an increase in funding. Formerly the Homes and Communities Agency, Homes England's affordable homes programme has had a budget of £9 billion for the five-year period up to 2021 and it is crucial that the money announced in September will not mean a reduction funding for this programme. CPRE called for

more clarity on how funding will be shared out between housing associations, and firm assurances that rural housing associations will receive their fair share. Rural communities are feeling the effects of the housing crisis just as acutely as cities, and without properly proportioned funding for rural areas, they risk being left behind.

### Large-scale investment is needed

In June, the Secretary of State for the Ministry of Housing, Communities and Local Government, James Brokenshire, announcement that the government will be investing £1.67 billion to support a 'new generation of council housing'. But while welcoming the acknowledgement of the need for social housing, CPRE cautioned that this would 'barely scratch the surface' of the rural housing crisis.

The Social Housing Green Paper published in August makes a number of positive steps towards addressing the real catalyst of the housing crisis: the affordability of homes for ordinary people. However, investment proposals are just tinkering around the edges of the problem in the hope that the market will deliver, when what is needed is large-scale government investment in social housebuilding. Crucially, the paper says almost nothing about the particular issues faced by rural communities, and little evidence that the Ministry for Housing, Communities

**“As long as the government continues to prioritise subsidising home ownership over delivering more homes for social rent, low income rural households will continue to lose out.”**

and Local Government have effectively rural-proofed this policy initiative, and CPRE will be working with its partners in the rural housing sector to suggest ways of doing so in our response to this consultation.

We're calling for a revolution in how government approaches social housing in rural areas, including substantial investment in social housebuilding from the government, and the proportion of grant funding for use in rural areas to be ring-fenced in line with the proportion of the population living there. 'As long as the government continues to prioritise subsidising home ownership over delivering more homes for social rent, low income rural households will continue to lose out,' said Lois Lane. 'We urgently need a new social housebuilding programme that will deliver on a significant scale, with properly proportioned grant funding for rural areas.'