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Campaign to Protect  
Rural England  
Standing up for your countryside

# Community Control or Countryside Chaos?

## The effect of the National Planning Policy Framework two years on



# Contents

Foreword .....	1
Executive Summary .....	2
Introduction .....	4
<b>Section 1</b>	
Who is really making the big decisions on where new housing should go? .....	5
<b>Section 2</b>	
What can we learn from Local Plan adoption rates? .....	11
<b>Section 3</b>	
Is the redevelopment of brownfield land being prioritised? .....	17
Conclusions and recommendations .....	21

## **List of Appendices**

*(published separately from the report)*

- A. Key planning appeal cases reviewed by CPRE  
(April 2013 – March 2014)
- B. Major housing developments approved  
by local authorities
- C. Local Plan greenfield allocations  
and brownfield targets



## Foreword by Shaun Spiers

### Chief Executive, CPRE

England is the most densely populated major country in Europe, yet it retains beautiful, uncluttered countryside and a clear distinction between town and country that is the envy of many less crowded countries. This is an achievement of a planning system which, at its best, both protects the countryside and aids the vitality of towns and cities.

Two years ago the National Planning Policy Framework (NPPF) introduced the biggest changes to the planning system for thirty years. Ministers certainly did not set out to destroy the countryside. They had some admirable aims, including getting local authorities and parishes to plan positively for the future. The increase in the number of Local Plans and the widespread interest in neighbourhood planning have been notable successes.

But when the NPPF was launched CPRE warned that it gave too much weight to economic growth at any cost and too little to environmental and social concerns. We warned that it would result in more haphazard development, harming the countryside and undermining towns needing regeneration.

At the time we were accused by some people of scaremongering. The evidence gathered in this report shows conclusively that our concerns were well-founded.

For almost two years Ministers have turned a blind eye to the NPPF's consequences. They must know – plenty of MPs have told them – that it will result in a good deal of shoddy development in the countryside while vacant sites within towns remain undeveloped. Given the depth of the housing crisis, they have been grateful for any building.

But the tragedy is that there has been far too little housebuilding. We are destroying too much countryside while building too few homes. Buy-to-let landlords, estate agents, and those with shares in the major housebuilders have done well in the last couple of years; those in need of housing and those who love the countryside (often the same people) have not.

I hope Ministers will read this report, which is based on appeal decisions and evidence from CPRE's branches across the country. There have been signs recently that the Government is willing to rethink its approach in light of the gradual economic recovery and the growing evidence of inappropriate development. But it needs to do more, through decisions on planning appeals and Local Plans, to let local authorities know that some things – quality of life, our precious countryside, good design and place-making –

matter as much as the number of houses built. They also need to refine some key policies to prioritise the use of brownfield land, to achieve the right housing in the right locations, and to make sure local communities really do have their say. These tenets are central to CPRE's Save our Countryside Charter, which thousands of people have already signed to show their support for our campaigning.

In January Nadhim Zahawi, MP for Stratford-on-Avon, pointed to the immense damage that loopholes in the NPPF were doing to the Government's flagship policy of localism, and warned: 'if it continues, the physical harm it is doing to our countryside will become the defining legacy of this Government'. This was not, unfortunately, an exaggeration. There is a better way.

#### Shaun Spiers

Chief Executive, CPRE

Shaun Spiers  
Chief Executive, CPRE



# Executive summary

**T**he Campaign to Protect Rural England (CPRE) is a strong supporter of the planning system as a tool for helping us to use land efficiently, enabling the provision of new development, while also protecting and improving the countryside. Local involvement in the plan-making and decision-taking processes are also critically important. The National Planning Policy Framework (NPPF), introduced on 27 March 2012, was designed to make the planning system simpler and more accessible to the public. This report considers how the NPPF has been implemented in the period since March 2013 through the analysis of the 29 Local Plans that have been prepared and/or adopted since then, and through over 70 key decisions on major planning applications and appeals.

Planning for housing is where the system is causing most concern. CPRE believes that we need more new housing, and a particular priority should be affordable housing to meet identified local needs. Policies on how local authorities should demonstrate a five year supply of housing sites have not been sufficiently clear and our analysis shows that this is leading to unnecessary loss of countryside. This is causing frustration and anger at the local level and not delivering the Government's aspirations for 'localism'. This is largely because pressure from developers, legal action, and/or decisions by Planning Inspectors are restricting how local authorities can demonstrate land available for housing.

Local planning authorities' policies continue to be undermined, with at least 39 out of 58 major housing developments being granted at appeal by the Secretary of State or his Inspectors in the last year alone. This is double the number identified in CPRE's research covering the previous year (2012/2013). In at least 14 additional cases, local authorities have felt that due to the threat of appeal they have had no choice but to grant applications for major development, even where these are not in accordance with established Local Plans.

There have been some glimmers of hope. The Government has allowed a very small number of local authorities to set housing supply targets lower than assessed 'need' because of a recognition that the availability of land is environmentally constrained. Decisions by the Secretary of State have occasionally refused developments through appeal or call in, on the grounds of design or countryside protection. Most of the evidence, however, points to a simplistic approach to planning for new housing, which has focused on a national desire to get housebuilders building. This means that development is being directed, through Local Plan examinations and planning appeals, to profitable locations for large housebuilders regardless of the environmental consequences.

The slow delivery of Local Plans is a serious concern. On current trends of Local Plan completion, there will not be comprehensive Local Plan coverage in England by the 2015 General Election; around a third (34%) of local planning authorities are unlikely to have an up to date, finalised Local Plan in place. Trends also suggest that over the last two years the NPPF has served to slow down the rate of Local Plan completion compared with the two years before March 2012. Local Plans have limited weight in planning decisions, even after the recent changes introduced by the planning practice guidance, until they are near completion. There has been significant and encouraging progress in setting up neighbourhood planning, but neighbourhood plans are unlikely to fill in the gaps in Local Plan coverage, at least in the short term.

The most recent (2009) Government figures state that there is enough suitable brownfield land available for 1,500,000 new houses. There is no evidence to suggest that this figure has significantly reduced. Emerging and adopted Local Plans are, however, proposing significant amounts of building on greenfield land. We estimate that land has been allocated for nearly three quarters of a million new houses. (729,000; of which 190,000 are in the Green Belt.) These sites are often on the edge of country towns and villages. It seems that the precedent set by Government appeal decisions is encouraging developers to target such locations. Many of these 'villages under siege' are faced with planning applications proposing development well in excess of the amount envisaged in emerging or adopted Local Plans.

Though limited, there is some evidence that local authorities are setting targets for the use of brownfield land, as encouraged by policies in the NPPF. We identified 84 local authorities outside Greater London (27% of all local planning authorities) either explicitly setting a local brownfield target or a 'brownfield first' policy for new housing. Efforts to set such policies are being undermined, however, in a number of cases by Government interventions preventing a 'sequential approach' to the release of sites, which requires brownfield sites in an area to be developed before greenfield. As a result, two local authorities have had to abandon original intentions to set a local target, and in other cases local targets envisage only a small proportion of new houses being built on brownfield land.

## Recommendations

Based on our analysis of issues set out in this report, and taking account of the recently published Planning Practice Guidance, CPRE calls on the Government to:

- Amend the NPPF to stress that brownfield (previously developed) land should be developed before greenfield, and that local authorities can enforce such a policy approach through controlling (or ‘phasing’) the order in which allocated sites become available for development.
- Recast the presumption in favour of sustainable development, as set out in paragraph 14 of the NPPF. This should put a greater burden of proof on developers to show, when they apply for planning permission, that proposed developments are socially and environmentally, as well as economically, sustainable.
- Amend paragraph 49 of the NPPF so that there is not an automatic presumption in favour of granting planning permission where the local authority is unable to demonstrate a five year land supply. It should be made clear in these cases that developers should still be expected to meet local policy objectives, for example where a local authority seeks to use brownfield sites before greenfield.
- Revise footnote 11 of the NPPF so that land that already has planning permission is clearly considered as being part of the five year land supply, and that this should not normally be challenged.
- Drop the requirement in the NPPF to allocate an additional 20% ‘buffer’ of ‘deliverable’ housing sites.
- Issue further guidance to the NPPF stating that development in and around villages should be properly considered through either the Local Plan or neighbourhood planning process. Building outside settlement boundaries should only happen in exceptional circumstances, and full consideration should be given to cumulative impacts of developments on the character of the countryside and rural settlements.
- Give greater scope for planning applications to be refused on grounds of ‘prematurity’, in order to allow suitable time and space for local authorities and neighbourhoods to develop robust plans for the future of their area.

**Development outside village boundaries must not damage local character**





# Introduction

**T**he Campaign to Protect Rural England (CPRE) believes that the planning system should be a key tool to enable us to protect and enhance rural and urban areas, while accommodating sustainable development that meets identified local needs. Our publication, *2026: A vision for the countryside*, which looks ahead to our centenary year envisages that by then:

*‘Planning is now supported across the political spectrum – not just as a tool for delivering economic development, but as a means by which society ensures genuinely sustainable development. Quality of life and environmental protection, notably the need to tackle climate change, are given serious weight within the system, and most decisions on land use are taken locally.’*

At times over the past few years it seems that the Government’s approach to planning has been to question its very role in helping us make informed decisions over development and land use. The National Planning Policy Framework, published in March 2012, represented the most far-reaching reform to planning for over 20 years. Thanks to vigorous campaigning by CPRE and others, the final document was an improvement on the draft. However, the reforms have had the overall effect of loosening controls over housing development on greenfield sites. But it has also presented an opportunity to better protect the countryside we have through encouraging comprehensive Local Plan coverage of the country.

This report considers progress two years on from the launch of the NPPF and is a follow up to our March 2013 report *Countryside Promises, Planning Realities*<sup>1</sup>. It focuses predominantly on planning for new housing. The NPPF covers a wide range of issues, but housing is seen by many as the litmus test of how effectively the system is working. There is a pressing need for much more new housing, particularly affordable housing for people on average incomes or below. New housing development has historically taken up more undeveloped countryside than any other form of development. That is why CPRE has been pressing for much greater use of suitable previously-developed, or ‘brownfield’, land for new housing. Often it is at the local level that there is the best understanding of brownfield capacity, valuable green spaces and countryside. It is therefore vitally important that local communities are able to participate meaningfully in discussions around new housing.

CPRE has concerns and interests with many other aspects of the NPPF, in particular policies on development in protected areas such as National Parks and Areas of Outstanding Natural Beauty; and on other forms of development such as renewable energy. These have been considered in other recent CPRE reports<sup>2</sup>.

This report seeks to consider, with reference to Ministerial commitments and policies within the NPPF:

- Who is really making the big decisions on where new housing should go? (Section 1)
- What can we learn from Local Plan adoption rates? (Section 2)
- Is the redevelopment of brownfield land being prioritised? (Section 3).

**Privett Green in Petersfield: a sustainable development that met local needs**



<sup>1</sup> <http://www.cpre.org.uk/resources/housing-and-planning/planning/item/3260-countryside-promises-planning-realities>.

<sup>2</sup> Recent CPRE reports, *Generating Light on Landscape Impacts* and *Going Going Gone*. All available from [www.cpre.org.uk](http://www.cpre.org.uk).

## SECTION 1

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**Who is really making the big decisions on where new housing should go?**





# Who is really making the big decisions on where new housing should go?

**Our view:** The NPPF policies on housing land supply have given more power to large developers and their agents, and the Planning Inspectorate has not always been helpful to local communities looking to get plans in place. More recent decisions, however, suggest that more weight can be given to NPPF policies that support Local Plan-making and protection of the environment. It is too early to predict precisely what effect the new Planning Practice Guidance will have.

C PRE strongly believes that the planning system should be made more accessible to local communities and the general public. As Ministers have emphasised, local communities should be given more control. The implementation of the NPPF policy requirement for local authorities to identify and show a five year supply of ‘deliverable’ sites as set out in paragraphs 47 and 49, however, has brought about a reality far removed from Ministers’ stated aspirations (see box on the right). This lack of clarity in the policy has led to a number of legal disputes and caused particular problems for local authorities and the communities they represent.

First, it is unclear how local authorities can meet the ‘five year land supply’ requirement as currently drafted. It is not merely a requirement to identify sites in a plan and update the list of sites annually; in practice it is also necessary to show that such sites are available on an on-going basis. A key legal judgment on this part of the NPPF was made by the Court of Appeal in December 2013<sup>3</sup>. The judge found that the NPPF housing supply policy was unclear, particularly on the critical issue of how local authorities with large areas of Green Belt or other protected landscapes should meet identified housing need when the need would lead them to identify significant amounts of land for development in these protected areas. The judge noted ‘ambiguity in the drafting’ and called on the Secretary of State ‘to review and clarify what his policy is intended to mean’.

Second, in cases where a plan is ‘absent’ (which currently applies in nearly half of the country – see section 2 below) it is now normally the case that planning applications will be allowed, unless either (i) the harm of the proposal ‘significantly and demonstrably’ [paragraph 14 of the NPPF] outweighs the benefits or (ii) NPPF policies such as on

## GOVERNMENT COMMITMENTS

### ‘I WANT FEWER APPEALS TO THE PLANNING INSPECTORATE AND MORE DECIDED LOCALLY’

(LOCALISM BILL REPORT STAGE,  
HOUSE OF COMMONS 17 MAY 2011)

RT HON GREG CLARK MP,  
FORMER PLANNING MINISTER

### ‘PLANNING SHOULDN’T BE THE PRESERVE OF TECHNOCRATS, LAWYERS AND COUNCIL PLANNING OFFICERS’

(LETTER TO ANNETTE BROOKE MP  
DATED 30 OCTOBER 2013)

NICK BOLES MP, PLANNING MINISTER

Green Belt indicate that development should be restricted. In addition, local authorities feel pressured into allowing planning applications by the threat of costs awards in planning appeals. This has been seen, for example, in Telford and Wrekin (see following section) and the Derbyshire Dales (where council members allowed a recent application in Ashbourne). Although Ministers made a small amendment to these in late 2012, such awards, which can run to tens of thousands of pounds for the largest cases, can currently take place if a local planning authority is found to have ignored relevant national policy and precedents<sup>4</sup>. In December 2013, the Chancellor of the Exchequer, George Osborne MP, also suggested that, in future, local authorities who refused housing applications would not be eligible for the New Homes Bonus payment if these applications were granted at appeal. This appears to be another attempt to pressure local authorities into accepting development, no matter how damaging or inappropriate it might be.

<sup>3</sup> *City and District Council of St Albans v R (on the application of) Hunston Properties Limited*, [2013] EWCA Civ 1610.

<sup>4</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/appeals/behaviour-that-may-lead-to-an-award-of-costs-against-appeal-parties/>



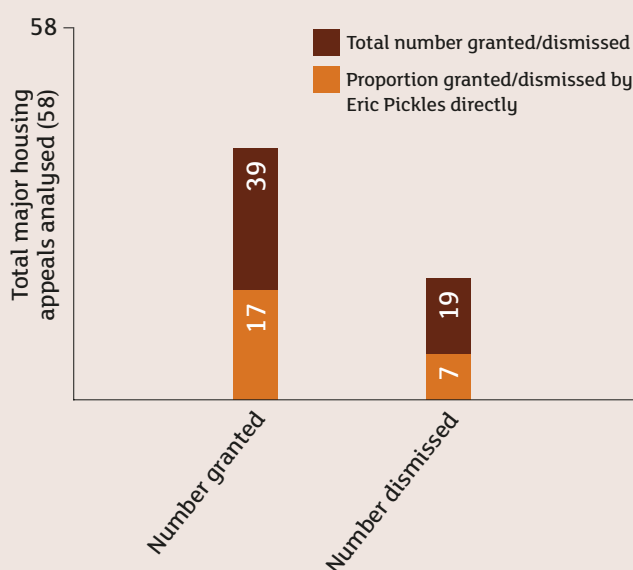
In March 2013, CPRE found at least twenty cases where major housing developments (of 10 dwellings or more) were granted planning permission in open countryside, despite being contrary to local planning policies and, more widely, the Government's stated commitment to localism. At the time the Government disputed our analysis, saying that the cases are not representative. Ministers have also pointed to an overall reduction in the number of appeals. But the proportion of all appeals for major housing developments (each of 10 dwellings or more) that have been allowed has steadily climbed over the past five years, from 31.7% in 2008/9 to 46% in 2012/3<sup>5</sup>. A report by Savills later in 2013 claimed that 75% of all planning appeals for 'large' housing developments between March 2012 and March 2013 had been allowed<sup>6</sup>. This trend appears to have continued since then. CPRE has analysed 58 appeal decisions in the 11-month period since the beginning of April 2013, and of these 39 major developments (67%), totalling around 8,700 new houses on greenfield land, have been granted. The decisions are summarised in Annex A to this report.

The appeal cases we have reviewed are well known across the planning community as cases where particularly critical principles in the NPPF have been explored in detail. In particular, nearly half (17) of the 39 developments we mention were decided by Secretary of State Eric Pickles directly rather than by an Inspector (so called 'recovered' appeals), while only seven 'recovered appeals' for major housing development were dismissed. Given their political stamp, such decisions are likely to have still more weight and publicity than most appeal cases decided by Inspectors. The message of these decisions is clear: since the NPPF came into force, the Government is much more likely to back a developer at appeal in most major cases. Local planning authorities are therefore likely to see these appeal decisions as precedents which they must follow.

### Local authorities 'throwing in the towel'

There is clear evidence that the effect of these decisions has been to cow local authorities into approving large housing developments that are contrary to agreed Local Plans or which prejudice proper local consideration of where new development should take place. This will not be reflected in the appeal figures that Planning Minister Nick Boles has cited. Moreover, the Government is unlikely to have knowledge of how many times this has happened, as local authorities are no longer required to notify the Secretary of

### APPEAL CASES GRANTED AND DISMISSED



State of major departures from the Local Plan. Local CPRE groups have drawn attention to fourteen such local authority decisions, which are summarised at Annex B to this report. There are likely to be many more examples.

A few local planning authorities are standing firm and refusing major applications which would have damaging consequences, often in the face of officer advice to allow the development in question. Recent examples include Harrogate (600 dwellings) and Ryedale District, North Yorkshire (225 dwellings). It is not yet known what the final outcome of any appeal (assuming that is what developers decide to do) will be in either case.

As a result of all this, many local authorities now feel that they have little or no control of the planning process, contrary to what Ministers had intended. This has been evidenced, for example, in statements issued in late 2013 by the leaders of both Horsham District and Telford & Wrekin Councils<sup>7</sup>. But signs are emerging that Ministers are beginning to realise the problems caused by their interventions to date, and rethinking their use of the planning appeals process (discussed further overleaf).

<sup>5</sup> Planning Inspectorate, Statistics Reports for 2011 and 2013. Accessed from [www.planningportal.gov.uk](http://www.planningportal.gov.uk).

<sup>6</sup> Savills, *Residential Property Focus – NPPF: One Year On – Effect on Supply*, 2013.

<sup>7</sup> [www.telford.gov.uk/press/article/2160/national\\_policy\\_leaves\\_planners\\_hands\\_tied\\_on\\_new\\_homes\\_applications](http://www.telford.gov.uk/press/article/2160/national_policy_leaves_planners_hands_tied_on_new_homes_applications) and <http://www.wscountytimes.co.uk/news/local/council-chief-takes-fight-against-housing-to-minister-1-5441698>, latter article dated 1 September 2013.

### Planning Inspectors are playing an unhelpful role

The Planning Inspectorate is still well-respected for its professionalism by CPRE local groups. But there are concerns that Planning Inspectors, who need to be seen as impartial due to their role in either running Local Plan examinations or deciding appeals, have been drawn into an increasingly political role due to the lack of clarity about policies on five year land supply.

Due largely to the 2008 recession in the housing market, a 'shortfall' in housing completion rates has arisen in many areas compared to the numbers predicted as being needed in household projections and the former regional plans. The NPPF requires local authorities to grant planning permissions for up to 20% more housing than the 'objectively assessed need' to cover this. The so-called 'Liverpool' method allows local authorities to grant planning permission for the additional new houses required evenly over the remaining plan period. This is obviously more practical

and deliverable. The 'Sedgefield' alternative requires local authorities to release land to meet the shortfall into the first five years of the remaining plan period. This allows developers to argue that the amount of land with planning permission for housing has to rise much more quickly than had been previously planned.

This issue has been discussed in a number of the Government planning appeal decisions reviewed for this report<sup>8</sup>.

The evidence suggests that the Inspectorate has played a central, and not entirely helpful, role in this regard. The NPPF does not clearly mandate the use of one or other approach. But the new Planning Practice Guidance describes, however, the more onerous 'Sedgefield' method as the approach to be followed<sup>9</sup>. To date the method has been applied unevenly, allowing developers to build on greenfield sites in often attractive market locations (such as eastern Cheshire and the Ribble Valley) rather than allowing local authorities to prioritise building on brownfield sites in nearby urban areas (see also Section 3).

#### Developers are being allowed to build on greenfield sites



<sup>8</sup> See table at Annex A.

<sup>9</sup> See <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/stage-5-final-evidence-base/>



Linked to this, some Inspectors have also interpreted the requirement for sites to be 'deliverable' in a manner unhelpful to local authorities and local communities. Rather than upholding the NPPF aspiration that development should be 'genuinely plan-led', Inspectors have stated that sites without planning permission (but which could appear in a draft Local Plan) cannot be included in the list of 'deliverable' sites, and have allowed developers to test a local authority's allocation of sites at any time through applying for planning permission and then appealing. An August 2013 appeal<sup>10</sup> in Reigate and Banstead Borough, Surrey, is a key illustration in point.

At present, if there is some evidence of existing sites being 'undeliverable', no matter how recently they were granted planning permission, they will no longer count towards a local authority's five year land supply. There is no similar planning requirement, however, on developers to show, in exchange for receiving planning permission, that they will deliver the new housing within five years.

### Towns and villages under siege

'Off plan' development granted at appeal has already led to over 8,000 houses being allowed in open countryside and Local Plan proposals for over 700,000 more (see Section 2). Furthermore, the effect of the NPPF is leading to major development pressure around a number of towns and villages, with multiple developers seeking planning permission on sites ringing a settlement at the same time. Local CPRE groups have identified several examples of such villages 'under siege', to use the words of former Defra Minister David Heath MP (see case studies map overleaf).

The situation has arisen due to a number of factors. Chief among these are the NPPF policies on housing, which open the way for planning applications for housing if the local authority does not have an up to date plan allocating a five year supply of housing sites. But also, the new Planning Practice Guidance states that Local Plan settlement boundary policies will need to have explicit justification if they are to continue in future<sup>11</sup>.

### Light at the end of the tunnel?

There is some evidence to suggest that the Government may now be beginning to rein back from using the appeals process to approve large scale development. CPRE's analysis shows that, of the 19 appeals in our sample that were dismissed, over half (11) were decided in the four months to

the end of February 2014. These decisions are showing that environmental policies in the NPPF, such as on protection of the countryside and good design, can be given weight above questions of housing land supply. A refusal, in December 2013, in Cheshire West gave weight to the NPPF policies on the intrinsic value of the countryside, and in, November 2013, a refusal in Pendle, Lancashire, emphasised the poor design of the proposed scheme. A further decision, in Wealden, Sussex in June 2013, clearly rebutted previous Inspector decisions that housing sites without planning permission could not be included in the five year supply, thus providing a small degree of relief in that regard.

CPRE will continue to monitor the implementation of the NPPF to see if this is a short-term improvement or an indication of a positive shift to promoting genuinely sustainable development on the part of the Government, rather than development at any cost.



<sup>10</sup> Decision dated 7 August 2013, see table at Annex A.

<sup>11</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/rural-housing/how-should-local-authorities-support-sustainable-rural-communities/>

# Villages and towns 'under siege'

- Areas of Outstanding Natural Beauty
- National Parks



Location	Current population <sup>12</sup>	Number of houses proposed <sup>13</sup>	Potential increase in population% <sup>14</sup>
Ashbourne, Derbyshire	7112	1047	35
Feniton, Devon	1796	285	38
Four Marks, Hampshire	3549	350	24
Buntingford, Hertfordshire	4820	825	41
Gurnard, Isle of Wight	1696	128	18
Faversham, Kent	17710	378	5
Warton, Fylde, Lancashire	3573	1365	92
Norton St Philip, Somerset	848	296	84
Gnosall, Staffordshire	4877	154	8
Kentford, Suffolk	420	340	194
Welland, Worcestershire	1136	80	17

<sup>12</sup> Office of National Statistics 2001 figures for parish (latest figures available).

<sup>13</sup> Information supplied by CPRE members and volunteers as of February 2014.

<sup>14</sup> Based on multiplying the number of proposed houses by the current average household size in England (2.4); and dividing this figure by the current population multiplied by 100.



## SECTION 2

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# What can we learn from Local Plan adoption rates?





## What can we learn from Local Plan adoption rates?

**Our view:** Just over half of local authorities have up to date plans in place. On current trends only two thirds will do so by the 2015 General Election. Following initial signs of promise in the two years before the adoption of the NPPF, the rate at which local authorities are getting adopted plans in place has slowed significantly since March 2012. Neighbourhood planning is clearly having an impact but it is unlikely, in the near future, to fill the gaps in Local Plan coverage.

**C**PRE supports the NPPF policies calling for all local authorities to have a Local Plan in place. This could provide better protection of the countryside we have. In addition, we also believe that the local planning process is a valuable forum for public debate and awareness, and local decision-making.

In statements about progress on Local Plans, Nick Boles has referred<sup>15</sup> to the rate at which local authorities have published 'core strategy development plan documents' (now increasingly called Local Plans due to the Government's reforms) in draft as defined in the *Planning & Compulsory Purchase Act 2004*.

The Minister's analysis, referring to published draft Local Plans, misses important elements of the full picture. Once published, draft Local Plans go through a consultation and examination process that often lasts for a year or more. The National Planning Practice Guidance states that unless a draft Local Plan has been submitted for examination by the Planning Inspectorate, claims that a development may be 'premature' in light of a Local Plan soon to be adopted will not be supported. In several of the appeal cases we discussed above, a local authority had a published plan in place, but the Secretary of State or appeal Inspector gave it little weight because the process had not been completed. In CPRE's view, a better means of evaluating the impact of the NPPF is to look at the number of local authorities with plans that have either been ruled 'sound' by an Inspector or adopted.

### GOVERNMENT COMMITMENTS

**'WE HAVE PUT LOCAL PLANS AT THE CENTRE OF THE PLANNING SYSTEM. LOCAL PLANS ARE THE KEY TO DELIVERING SUSTAINABLE DEVELOPMENT THAT REFLECTS THE VISION AND ASPIRATION OF LOCAL COMMUNITIES.'**

(PARLIAMENTARY ANSWER 24 JANUARY 2014)

NICK BOLES MP, PLANNING MINISTER

The table on the next page provides an analysis of data provided by the Planning Inspectorate on Local Plan progress and adoption. The analysis shows that, after an initial pick up in Local Plan adoption rates between 2010 and 2012, the rate at which local authorities are getting plans in place has dropped off significantly since the NPPF came into force. 187 out of 336 local planning authorities have adopted plans (56%). Based on the trend since the NPPF came into force, therefore, only around two thirds of all local authorities will have up to date, sound Local Plans by the 2015 General Election.

The first core strategy was adopted in December 2006. It should also be noted that, of the 187 authorities with sound Local Plans (including core strategies), only 48 have plans which post-date the NPPF. 263 out of 336 (78%) have at least published a draft plan for consultation. 85, or 23%, have not published a draft new plan since 2006.<sup>17</sup>

<sup>15</sup> House of Commons Hansard 24 January 2014, Column 330 (parliamentary answer).

<sup>16</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/determining-a-planning-application/how-must-decisions-on-applications-for-planning-permission-be-made/>

<sup>17</sup> [http://www.planningportal.gov.uk/uploads/pins/local\\_plans/LPA\\_Core\\_Strategy\\_Progress.xls](http://www.planningportal.gov.uk/uploads/pins/local_plans/LPA_Core_Strategy_Progress.xls). Accessed on 25 February 2014.

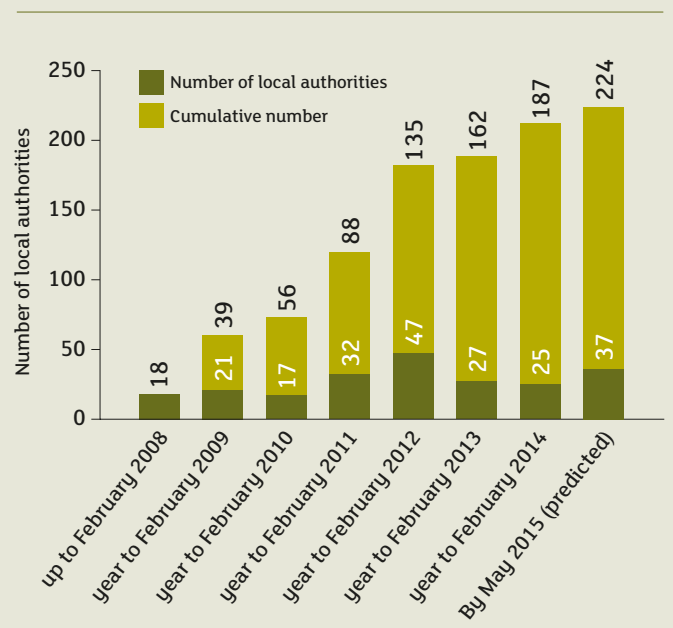


Rate at which local authorities are getting sound or adopted plans since 2006	Number of local authorities	Cumulative number	Monthly rate at which local authorities are getting sound plans
(inclusive)			
December 2006 – February 2008	18	18	1.2
March 2008 – February 2009	21	39	1.8
March 2009 – February 2010	17	56	1.4
March 2010 – February 2011	32	88	2.7
March 2011 – February 2012	47	135	3.9
March 2012 – February 2013	27	162	2.3
March 2013 – February 2014	25	187	2.1
By May 2015 (General Election) predicted	37	224	
Number of local authorities per month 2006-2014			2.1
Number of local authorities per month 2012-2014			2.2
Percentage of local authorities projected to have an up to date plan by 2015			65

Incidences of Local Plan withdrawal or examination failure are growing<sup>18</sup>. Fifteen local planning authorities have withdrawn their plan for amendment since the NPPF came into force. Nine of these were in the year since March 2013<sup>19</sup>. In some cases, this is because work had begun on withdrawn plans before the NPPF, meaning that these plans need to undergo substantial revision to conform with national policy, with housing land supply being the main issue of contention. In these and other cases, planning inspectors have emphasised both the Localism Act's 'duty to co-operate' and housing need evidence.

CPRE supports the Localism Act's 'duty to co-operate' between local authorities on producing strategic elements of Local Plans, which in our view is critical to the effectiveness of Green Belts and protected landscapes as strategic tools of countryside protection. But the lack of clarity about how the duty should work has served to actively hinder progress towards Local Plan adoption in authorities across the country. Furthermore, proposals for large scale incursions into the Green Belt have emerged in areas of the North East, based on local authorities in effect competing with each other to release sites for housing development<sup>20</sup>.

**RATE AT WHICH LOCAL AUTHORITIES ARE GETTING SOUND OR ADOPTED PLANS**



<sup>18</sup> *Encyclopaedia of Planning Law and Practice* Monthly Bulletin January 2014, pp.3-5.

<sup>19</sup> *Planning* 21 February 2014, 'Rules of Compliance: Getting Local Plans Back on Track'.

<sup>20</sup> See CPRE submission of evidence to the All Party Parliamentary Group on Green Belt (January 2014), available on request from CPRE.

The National Planning Practice Guidance now provides more detail. In particular it states that 'local planning authorities are not obliged to accept the unmet needs of other planning authorities if they have robust evidence that this would be inconsistent with the policies set out in the [NPPF], for example policies on Green Belt or other environmental constraints.'<sup>21</sup> This may prove to be particularly helpful in areas such as Mid-Sussex where developers have used the lack of clarity in the NPPF to argue that there was in fact such an obligation, and therefore planned housebuilding should increase accordingly.

### **'Plan, monitor and manage' not 'predict and provide'**

CPRE supports the need for more new housing provided through a 'plan, monitor and manage' approach. This involves setting clear objectives to make the best use of land, providing the development that the country needs through regenerating urban areas and developing affordable housing in villages with good services, while encouraging good management of the countryside and minimising its loss to development. The majority of new housing that is needed is affordable or social, and most new housing (whether market or affordable) can be built on previously developed (brownfield) land in or around towns and cities.

The NPPF is resulting, by contrast, in a 'predict and provide' approach to developing new housing. This is the reverse of 'plan, monitor and manage', and in effect makes planners slaves to market trends, regardless of need or impact, with development being planned mainly in areas where the economy has recently been buoyant. The NPPF requires local authorities to 'boost significantly the supply of housing' by assessing both projected population growth rates (based on past trends) and demand for housing, and allocating sufficient sites to meet this projected growth for five years (a five year land supply). Such sites have to be both economically 'viable' and 'deliverable', terms which favour market housing provided by large housebuilders on greenfield sites.

Some local planning authorities have been allowed by Government, since the NPPF came into force, to adopt plans providing for less than their 'objectively assessed need' (as determined by population projections and demand). These authorities, which in all cases cover large areas of

nationally protected land such as Green Belt, Area of Outstanding Natural Beauty (AONB), or National Park, include the following<sup>22</sup>:

- Eastbourne
- Hertsmere
- Mid Suffolk
- Purbeck
- Reigate and Banstead
- South Staffordshire
- Suffolk Coastal
- Watford
- Wealden
- West Berkshire
- Woking



<sup>21</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/duty-to-cooperate/what-is-the-duty-to-cooperate-and-what-does-it-require/>

<sup>22</sup> Nathaniel Lichfield and Partners, *Objectively Speaking: 12 months of applying the NPPF to housing targets in Local Plans: A review of examinations*, April 2013.



Landowners attempted to challenge the Local Plan in Wealden District in East Sussex in the High Court, on the basis that it had allocated insufficient housing land<sup>23</sup>.

The failure of this challenge, and the other examples listed, shows some welcome, albeit limited, recognition of the need to plan strategically to both meet housing requirements and the need to recognise environmental constraints to development. But even these limited gains are under threat of being lost or undermined. In another case, Sevenoaks District Council, which had successfully adopted a plan in 2011 (prior to the NPPF) with lower housing numbers than the 'objectively assessed' need, has subsequently lost a planning appeal for 40 houses on greenfield land at Swanley.

CPRE welcomes the good progress being made on Local Plan making. But we are also greatly concerned that the continued emphasis on 'predict and provide' is resulting in an unnecessary over-supply of greenfield land for housing. The most recent (2009) Government figures suggest that there is still enough previously developed (brownfield) land available for 1.5 million new homes, mostly in the largest urban areas<sup>24</sup>. CPRE has not seen more recent evidence to suggest that this amount of land has significantly decreased. Development in such areas should be given more priority than it is currently. Instead, at least 30 local planning authorities are planning to release land from the Green Belt for development<sup>25</sup> – far more than the number that have been allowed to, in some degree, derogate from 'predict and provide' in their plans. These issues are discussed in more detail in the following section.

CPRE's analysis<sup>26</sup> of recently adopted and emerging Local Plans suggests that over 700,000 new houses are planned on greenfield sites within the next 20 years. Many of these are in medium sized, often historic country towns such as Cannock, Grantham, Horsham, Oswestry, Selby, Sherborne, Stone, Stowmarket, Winchester and Yeovil. Growth around such places may often be preferable to the kind of development typically being granted around smaller towns or villages (see Section 1). But the wider planning approach seems to be one of encouraging development in locations attractive to the market, with wider environmental constraints being a secondary concern. A particular illustration of this is East Devon (see case study).

## CASE STUDY: EAST DEVON

This area has come under particular pressure to accommodate major housing growth. It is also covered largely by Areas of Outstanding Natural Beauty (AONBs). The district's Local Plan is currently (as of February 2014) under examination. A Planning Inspector's appeal decision to throw out a major development proposal on a green wedge in the village of Colyford in January has given cause for encouragement. But CPRE Devon is concerned that the target of 15,000 new houses for the district is unreasonably high, and has called for a lower target of 11-12,000. Major housebuilder Persimmon is calling for development of 257 houses on a greenfield site in the AONB on the edge of Sidmouth. Persimmon's agents have reportedly argued at the examination that the AONB 'isn't quite the constraint that the council would have us believe'.

Villages such as Feniton have also been targeted by speculators submitting several applications for housing developments on greenfield locations surrounding them (see Section 1).

Devon coastal path near Sidmouth



<sup>23</sup> *Planning*, 'Landowners lose High Court fight to block local plan', 24 February 2014.

<sup>24</sup> See Green Balance report for CPRE, *Building on a Small Island*, November 2011.

<sup>25</sup> Local Government Information Unit (LGIU) survey commissioned by the National Trust, December 2013.

<sup>26</sup> See table at Annex C to this report.

### Neighbourhood plans

The Government, local authorities and local communities have made significant and encouraging progress in setting up neighbourhood planning. In March 2013, however, only one plan had completed all the procedural stages. Since that time, according to DCLG figures, a further 4 have been completed, with a further 15 having successfully passed examination. As of February 2014, a fresh wave of 39 plans are at pre-submission stage with 15 submitted for examination. At this date, 691 areas had been designated.

But neighbourhood plans are unlikely to fill in the gaps in Local Plan coverage, at least in the short term. Neighbourhood plans, moreover, are required to be in 'general conformity' with the strategic policies (including on housing) within the Local Plan for the wider district or borough in which the neighbourhood area sits. Given that Local Plans also need to follow policies in the NPPF on supplying sites for housing, and that only just over half of all local authorities have adopted a new Local Plan since 2006 (see above), this has given rise to a significant procedural grey area which some

developers and landowners have sought to exploit. A legal challenge is being heard against a neighbourhood plan in Tattenhall, Cheshire and progress on at least three further draft plans is likely to be held up until the ruling is known<sup>27</sup>. The Planning Practice Guidance seeks to address this grey area and clearly set out the relationship between Local Plans and neighbourhood plans<sup>28</sup>.

Neighbourhood planning is also being placed at risk because of the legalistic, confrontational environment that the NPPF policies on housing land supply have encouraged. Since March 2013, developers have therefore been able to win major planning appeal cases in Cheshire (both Hartford and Tarporley), Hampshire (Basingstoke) and Oxfordshire (Bloxham, near Bicester), despite work having started on a neighbourhood plan in those areas. CPRE is not calling for a moratorium on all development where neighbourhood plans are being developed. But we believe that great weight should be given to work being done by local communities, if a major development proposal would serve to undermine this.

#### Neighbourhood planning is being placed at risk



<sup>27</sup> <http://www.planningresource.co.uk/article/1230933/buckinghamshire-neighbourhood-plan-examination-delayed-objection?DCMP=EMC-CONPlanningResourceWeekly&bulletin=planning-weekly>.

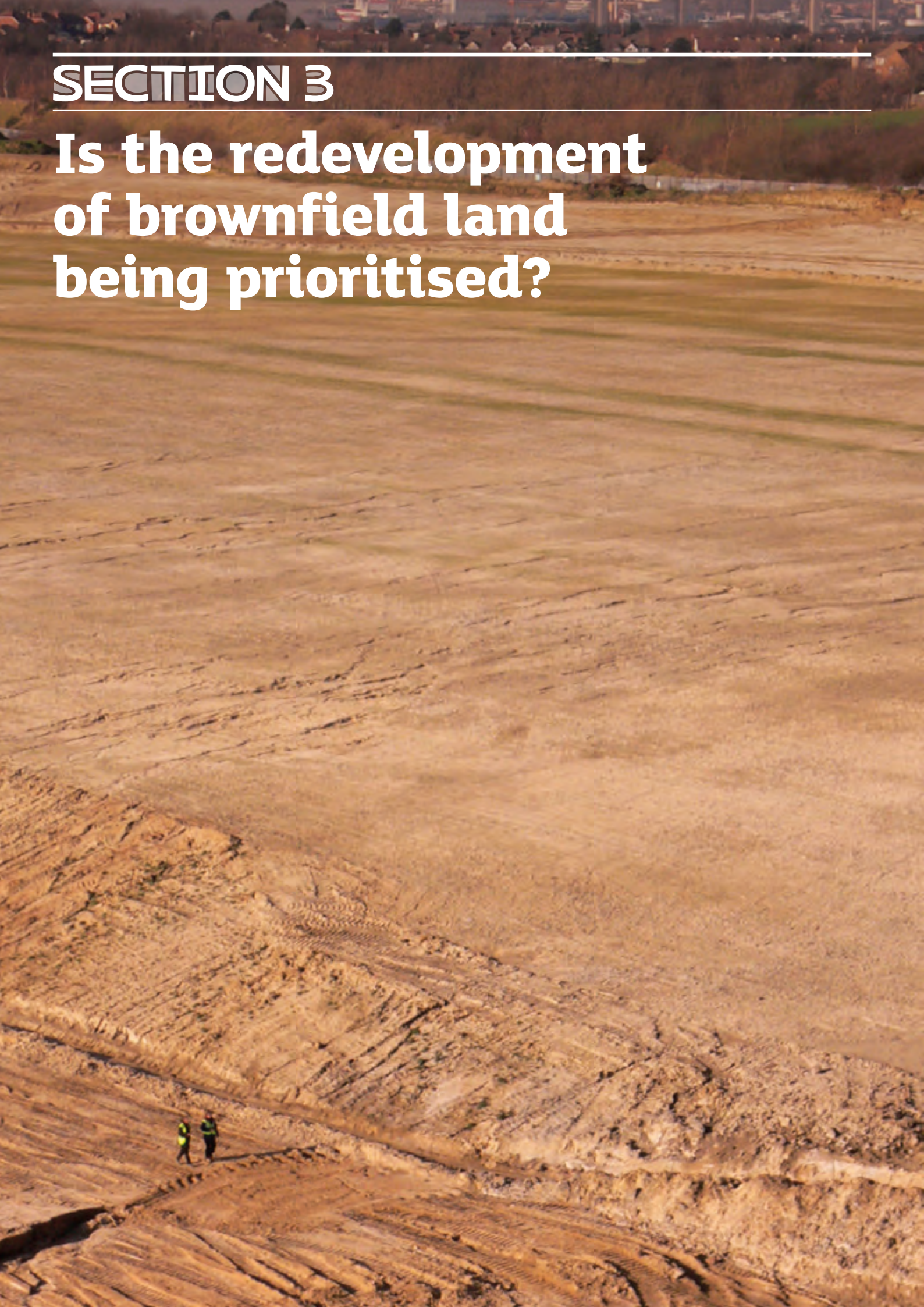
<sup>28</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/neighbourhood-planning/what-is-neighbourhood-planning/what-is-a-neighbourhood-plan-and-what-is-its-relationship-to-a-local-plan/>



## SECTION 3

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**Is the redevelopment  
of brownfield land  
being prioritised?**





## Is the redevelopment of brownfield land being prioritised?

**Our view:** Only a minority (27%) of local authorities outside London are setting local targets for the re-use of brownfield land in their area. In some cases the brownfield target is for a small proportion of new housing. Local authorities that have sought to set a policy requiring brownfield sites to be used before greenfield have been frustrated by Planning Inspectors. Meanwhile, local authorities are coming under increasing pressure to allow development in the Green Belt instead, with the level of development proposed now clearly exceeding that in the regional plans revoked by the Government in 2013.

CPRE believes that it is essential to use land efficiently in order to protect the countryside that we have. England is densely populated and there are multiple demands on the land available, including food and energy production, recreation and accommodating an expanding population. CPRE raised serious concerns about the draft NPPF because it made no mention of developing brownfield sites in preference to greenfield. The final NPPF gives local authorities more choice about whether or not to encourage the reuse of brownfield land for housing but this has so far been entirely inadequate. Following representations made by CPRE, the recently published Planning Practice Guidance gives further advice on bringing forward brownfield sites for development. Local authorities are advised to work with Local Enterprise Partnerships, look at relevant financial incentives such as Land Remediation Relief, and local policies 'should reflect the desirability of re-using brownfield land'<sup>29</sup>. CPRE welcomes this guidance and believes it will have a helpful effect, but the evidence also suggests that the policies in the NPPF itself are not strong enough.

There is some evidence of take up of the policies in the NPPF encouraging local authorities to set local targets for the use of brownfield land. CPRE's analysis of emerging and adopted Local Plans (including Local Plans adopted before the NPPF) has found that 84 local authorities outside Greater London (27% of all such local planning authorities) have either explicitly set a local brownfield target or are promoting a policy seeking brownfield sites to be used before greenfield for new housing. Efforts to set such policies are, however, being undermined in a number of cases by Government interventions preventing a 'sequential approach' to the

### GOVERNMENT COMMITMENTS

**'WE ARE STRESSING THE IMPORTANCE OF BRINGING BROWNFIELD LAND INTO USE'**  
(STATEMENT TO PARLIAMENT DATED 6 MARCH 2014)  
NICK BOLES MP, PLANNING MINISTER

release of sites, which requires brownfield sites in an area to be developed before greenfield. Two local authorities (Forest Heath and Ipswich, both in Suffolk) have had to abandon original intentions to set a local target, and in some other cases local targets envisage only a small minority of new houses being built on brownfield land.

Local attempts to prioritise the redevelopment of brownfield land have been discussed in a number of recent appeal decisions, including in Bromsgrove, Cheshire East, North East Lincolnshire and Warrington<sup>30</sup>, and in Local Plan examinations at Reigate & Banstead, Rotherham and Salford (see case study opposite). The clear picture emerging from these is that Inspectors are making it difficult for local authorities to control the order in which sites are given planning permission (sometimes called 'phasing' of development) in order to require brownfield sites to be developed before greenfield.

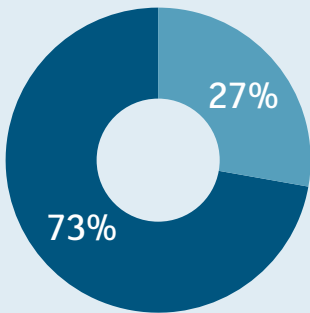
In particular, Inspectors have argued on more than one occasion that there is no evidence that developing more greenfield sites in an area negatively affects the viability of

<sup>29</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/viability-guidance/viability-and-plan-making/>

<sup>30</sup> For references see the table at Annex A.



### ANALYSIS OF EMERGING AND ADOPTED LOCAL PLANS



The percentage of local planning authorities outside London who have either explicitly set a local brownfield target, or are promoting a policy seeking brownfield sites to be used before greenfield for new housing

### CASE STUDY: SALFORD

In July 2012 a Planning Inspector examining an appeal found that there was enough brownfield land available in Salford to accommodate over 19,000 new houses. A number of these sites have already been given planning permission. Despite this, in November 2012 Salford City Council was forced to withdraw its draft Core Strategy, which identified many brownfield sites for development, due to the (different) Inspector calling for higher housing numbers and raising doubts as to whether the proposed sites were 'deliverable'. This has forced the Council to review its Green Belt, and in early 2014 it consulted on a number of potential Green Belt development sites put forward by landowners. Despite this, the Council has continued to actively seek to prioritise the redevelopment of brownfield sites. In February 2013 the Council Leader wrote to a number of major developers, including Peel and Taylor Wimpey, urging them to make use of the brownfield opportunities available. The Council reportedly intends to continue to promote the development of these sites through publishing a brochure.

brownfield sites that have been given planning permission. Academic research commissioned by CPRE in 2009 found that<sup>31</sup>:

- The effect of competing sites on the economic viability of sites can be modelled.
- Site-specific economic viability falls as competition from other sites increases.
- Competing greenfield site development can have a significant negative effect on brownfield site viability, particularly in housing market areas that are relatively weak (the report cites the examples of Corby and North Tyneside).

In addition, senior staff at the Home Builders' Federation (HBF) have in the past openly stated that housebuilders will control when sites with planning permission (whether brownfield or greenfield) are developed in a given area in order to both address local labour shortages and maximise the economic viability of individual sites<sup>32</sup>. This suggests that the Government should not undermine local policies on brownfield development simply because of concerns about limiting the supply of housing or of sites providing insufficient returns to developers. This is especially the case given that an industry report in November 2013 shows investors are regaining their appetite for brownfield land<sup>33</sup>.

Empty homes in Salford



<sup>31</sup> CPRE research report *Brownfield Market Signals* by Glasgow University, 2009.

<sup>32</sup> John Stewart (HBF): 'Responding to Barker', *Housebuilder* January / February 2006, pp.16-17.

<sup>33</sup> <http://pdf.euro.savills.co.uk/residential---other/land-mim-nov13.pdf>

### Green Belt threats

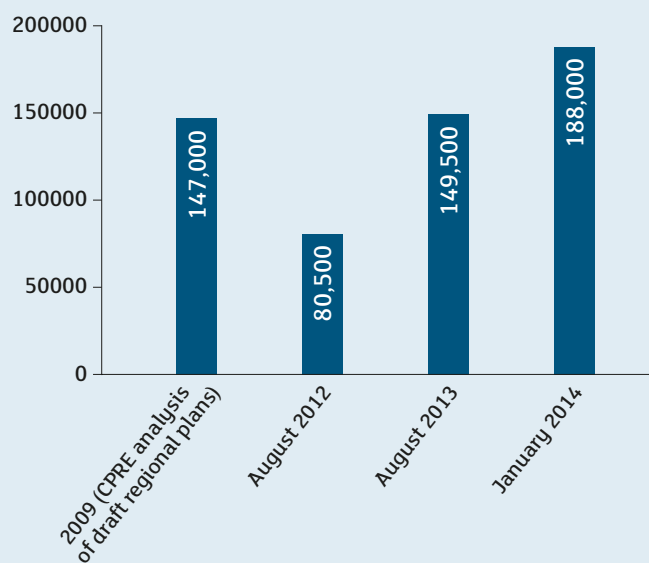
The primary purposes of Green Belt stated in the NPPF include 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land'. Despite some welcome statements since the publication of the NPPF which indicate the Government has been concerned about its impact on Green Belt protection, there is mounting evidence that this role is being seriously undermined.

In particular, CPRE has welcomed the two recent statements (on 1 July 2013 and 17 January 2014) by DCLG Minister, Brandon Lewis MP, which stated that unmet need for housing is unlikely to outweigh harm to the Green Belt and other harm that would constitute the 'very special circumstances' justifying inappropriate development in the Green Belt. Importantly, the statements have been followed through in appeal decisions in Castle Point, Essex (Thundersley), Nuneaton and Bedworth, Warwickshire (Hawkesbury) and Hertfordshire (Wheathampstead). But this has given only limited recognition to the pressures now facing Green Belt areas.

The undermining of Green Belts through various changes in Local Plans is a far more significant, and still growing, problem. Until very recently the Government has been much less clear about how it will approach the drafting of Local Plans, particularly where these invoke the 'exceptional circumstances' test for altering Green Belt boundaries. However in a letter dated 3 March 2014 to the Chief Executive of the Planning Inspectorate, Nick Boles criticised the role of the examining Planning Inspector who had asked Reigate and Banstead Borough Council to carry out a further Green Belt boundary review. Nick Boles clarified that the Government would expect it to be clear that Green Belt boundary reviews should only take place if the relevant local authority has chosen to do so and not at the behest of Planning Inspectors reviewing draft plans.

The cumulative total of housing currently proposed in Green Belts in various draft development plans is summarised in the chart below, and it now clearly exceeds that in the revoked regional plans. This is particularly significant because the Communities Secretary, the Rt Hon Eric Pickles MP, cited Green Belt threats as one of the main reasons for his decision to revoke the regional plans.

**PROPOSALS FOR HOUSING DEVELOPMENT IN THE GREEN BELT IN DRAFT LOCAL PLANS<sup>34</sup>**



<sup>34</sup> *Green Belt: Under Renewed Threat?*, August 2012; and *Green Belt and the NPPF – 18 months on*, September 2013. Available from [www.cpre.org.uk](http://www.cpre.org.uk).



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# Conclusions and recommendations





# Conclusions

**W**hen the National Planning Policy Framework was launched, Ministers undertook to make the system more accessible to the public – an aim that they have reiterated since – and encourage it to deliver more sustainable development. This report has considered whether, in relation to the critical area of planning for new housing, these ambitions are being achieved.

The overall picture in relation to planning for new housing is disturbing. Planning continues to have an exclusionary, legalistic character, typified by disputes between housebuilders, local authorities and others on the amount of land to be allocated. The implementation of the reforms has given a stronger hand to housebuilders. There has been a renewed emphasis on a ‘predict and provide’ approach based on meeting population projections and market demand, rather than housing needs taking account of environmental impact. Local Plan adoption rates have slowed since the adoption of the NPPF, and the Secretary of State has allowed a series of major developments at appeal in the face of local refusals.

There are some signs, in both Local Plan examinations and appeal decisions, that the Government is prepared to give greater weight to policies in the NPPF on protection of the environment than it has in the first two years of the policy. In some other cases the new Planning Practice Guidance, published in March 2014, seeks to resolve ambiguities within the NPPF. Key problem areas that have emerged in the first

two years of the NPPF, and which the Planning Practice Guidance aims to address, include how local authorities can demonstrate a five year supply of deliverable sites for new housing, and the relationship between Local Plans and neighbourhood plans.

There are also some signs of encouragement in connection with neighbourhood planning. Five plans have now been adopted and more are coming forward all the time. This suggests that the reform is both practical and successful in terms of engaging the public in planning. But neighbourhood planning has a long way to go before it becomes a central feature of the planning system.

CPRE concludes that the NPPF is some way short of the planning policy that is needed to make the best use of land, provide the new housing that the country needs, and properly give local communities more control over issues of major public interest. CPRE’s 2013 Charter to Save the Countryside<sup>35</sup> sets out broadly the further reforms that we think are necessary. This report highlights some specific improvements that are needed. The changes introduced by the Planning Practice Guidance go some way towards recognising the problems we identify in this report but they are but a small step to the kind of system the nation needs. Major changes are needed to ensure that more genuinely affordable housing is provided, urban regeneration is prioritised, and that the loss of countryside is minimised.

**Major changes are needed to minimise the loss of countryside to housing**



<sup>35</sup> [www.cpre.org.uk/how-you-can-help/take-action/housing-and-planning/item/3380-sign-cpres-charter-to-save-our-countryside](http://www.cpre.org.uk/how-you-can-help/take-action/housing-and-planning/item/3380-sign-cpres-charter-to-save-our-countryside)



# Recommendations

**Based on our analysis of the issues set out in this report, and taking account of the recently published Planning Practice Guidance, CPRE calls on the Government to:**

- Amend the NPPF to stress that brownfield (previously developed) land should be developed before greenfield, and that local authorities can enforce such a policy approach through controlling (or ‘phasing’) the order in which allocated sites become available for development.

- Recast the presumption in favour of sustainable development, as set out in paragraph 14 of the NPPF. This should put a greater burden of proof on developers to show, when they apply for planning permission, that proposed developments are socially and environmentally, as well as economically, sustainable.

- Amend paragraph 49 of the NPPF so that there is not an automatic presumption in favour of granting planning permission where the local authority is unable to demonstrate a five year land supply. It should be made clear in these cases that developers should still be expected to meet local policy objectives, for example where a local authority seeks to use brownfield sites before greenfield.

- Revise footnote 11 of the NPPF so that land that already has planning permission is clearly considered as being part of the five year land supply, and that this should not normally be challenged.

- Drop the requirement in the NPPF to allocate an additional 20% ‘buffer’ of ‘deliverable’ housing sites.

- Issue further guidance to the NPPF stating that development in and around villages should be properly considered through either the Local Plan or neighbourhood planning process. Building outside settlement boundaries should only happen in exceptional circumstances, and full consideration should be given to cumulative impacts of developments on the character of the countryside and rural settlements.

- Give greater scope for planning applications to be refused on grounds of ‘prematurity’, in order to allow suitable time and space for local authorities and neighbourhoods to develop robust plans for the future of their area.

# References and acknowledgements

Government planning decisions, <https://www.gov.uk/government/collections/planning-applications-called-in-decisions-and-recovered-appeals>

National Planning Practice Guidance website, <http://planningguidance.planningportal.gov.uk/blog/guidance/>

Planning Portal, [www.planningportal.gov.uk](http://www.planningportal.gov.uk)

Planning Resource (Planning magazine online), [www.planningresource.co.uk](http://www.planningresource.co.uk)

## **CPRE reports:**

Brownfield Market Signals (2009)

Building on a Small Island (2011)

Countryside Promises Planning Realities (2013)

Going Going Gone (2013)

Green Belt and the National Planning Policy Framework: 18 months on (2013)

CPRE also wishes to thank the large number of local CPRE branches that supplied both the case studies for the map on p.10, as well as details of several other local planning cases referred to in this report.

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CPRE fights for a better future for England's unique, essential and precious countryside. From giving parish councils expert advice on planning issues to influencing national and European policies, we work to protect and enhance the countryside.

We believe a beautiful, thriving countryside is important for everyone, no matter where they live. We don't own land or represent any special interests. Our members are united in their love for England's landscapes and rural communities, and stand up for the countryside, so it can continue to sustain, enchant and inspire future generations.

### Our objectives

We campaign for a sustainable future for the English countryside, a vital but undervalued environmental, economic and social asset to the nation. We highlight threats and promote positive solutions. Our in-depth research supports active campaigning, and we seek to influence public opinion and decision-makers at every level.

### Our values

- We believe that a beautiful, tranquil, diverse and productive countryside is fundamental to people's quality of life, wherever they live
- We believe the countryside should be valued for its own sake
- We believe the planning system should protect and enhance the countryside in the public interest



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