



Campaign to Protect
Rural England
Standing up for your countryside

Going, going, gone? England's disappearing landscapes



Going, going, gone? England's disappearing landscapes

Foreword by CPRE's President Andrew Motion

Whenever I have the good fortune to be in our matchless countryside, I see the result of thousands of years of human interaction with the land. I see our history of farming, husbanding, cropping, wood planting and hedge-building. I also see something that belongs to all of us – to every walker, hiker and camper, and to every person who looks out of a car or train window and gets a shiver of pleasure at the passing view.

The English countryside is our great collective masterpiece – and any development that needlessly damages it is an act of vandalism.

CPRE is observing a growing number of cases where this type of defacement is happening. Alarming, threats are even extending into some of our most beautiful landscapes such as our National Parks and Areas of Outstanding Natural Beauty and into locally valued landscapes.

I want to make it clear that I do not think our politicians are deliberately setting out to degrade and destroy our landscapes. However, they have created an atmosphere where all development is seen as good development. When even our protected countryside is at risk, what hope is there for our unprotected but equally loved 'ordinary' countryside?

We want every proposed development which could degrade our landscapes to be subject to rigorous planning tests. We are pushing the Government to respect their commitment to give a fair say to local communities. We are also demanding that the protections for our most iconic landscapes are not weakened further, but upheld and strengthened – and that our 'ordinary' unprotected countryside is also afforded the safeguards it deserves.

Beautiful landscapes, which loom so large in our history and culture, and which exert such a powerful hold over our imaginations, may one day only exist in the mind or on the printed page. Unless we act today.

It is imperative that we get the development our society needs without destroying our countryside. We can do both. We need to do both. We must do both.

Andrew Motion



Sir Andrew Motion surveying wind farm threats to the Lune Valley – part of the proposed extension to the Lake District National Park



Executive summary

Despite repeated assurances from Ministers that planning reforms safeguard our most treasured landscapes, this report, with evidence from CPRE branches across England shows that there is unprecedented pressure on National Parks and Areas of Outstanding Natural Beauty (AONBs).

The case studies in this report are a snapshot of the most significant current threats to National Parks and AONBs. We have also highlighted the dangers faced by landscapes that lack national protection but are, nevertheless, deeply valued by local communities. The report also considers the wider policy context in which decisions are being made about the future of these areas. Government policies mean that National Parks and AONBs, which should have the highest level of protection in planning, are increasingly threatened by damaging developments. The development proposals fall broadly within four categories: energy; housing; transport and tourism.

Cases highlighted in this report include the recent permission for 521 houses in the Kent Downs AONB and the cumulative visual impact of wind farms surrounding the Lake District National Park. Threats to locally valued landscapes include a proposed new 20km dual carriageway in open countryside in Norfolk, and a theme park in Swinley Forest, Berkshire.

As a result of the evidence gathered in this report, CPRE is calling on Government to:

- strengthen national planning policy by giving greater weight to the protection of nationally designated and locally valued landscapes;
- recognise the contribution that National Parks and AONBs make to our economy and review cuts to their funding in advance of the imminent Spending Review;
- produce guidance for the Planning Inspectorate on implementing the major development test in National Parks and AONBs;
- ensure that requests for applications to be 'called in' by the Department for Communities and Local Government are dealt with in line with the major development test in the National Planning Policy Framework;
- exempt National Parks and Areas of Outstanding Natural Beauty from the proposed changes to permitted development rights concerning the conversion of farm buildings; and
- review the draft planning policy guidance to ensure that best use can be made of the new Local Green Space designation.

CPRE is also calling for an urgent Parliamentary Select Committee Inquiry to review how major development is dealt with in National Parks and Areas of Outstanding Natural Beauty in order to protect and enhance their natural beauty for future generations.



Background

Growth agenda and impact on landscape

The Government's growth agenda is fuelling the number of applications being made for major development in National Parks, Areas of Outstanding Natural Beauty (AONBs) and locally valued landscapes. Many people, including some in government, appear to believe that National Parks and AONBs are a block to development and that they are becoming 'museum pieces'. This is far from the truth. National Park Authorities (NPAs) have a duty to 'foster the economic and social wellbeing of local communities within the National Parks'. They aim to maintain thriving, living landscapes, where natural assets are conserved and enhanced and where people, businesses and communities can prosper. Research by National Parks England¹ has revealed that:

- In 2012 £10.4bn of turnover was generated by businesses in National Parks and employment grew by 2.7%;
- There are also an estimated 95 million visitors to National Parks and surrounding areas each year, spending more than £4bn and supporting 68,000 jobs within, and surrounding, the Parks.

In July 2013, the National Association for AONBs (NAAONB) published a report by Land Use Consultants about the value of AONB Partnerships.² The report recognised the true value of AONB partnerships and highlighted concerns about their future funding. The Chief Executive of the NAAONB, Howard Davies, said 'All AONB partnerships are keen to use their influence to support the current drive for economic recovery and growth. The high landscape quality of AONBs, articulated in terms of their natural beauty, is now recognised as a key economic driver and the greatest opportunities for AONB partnerships are likely to lie in those sectors that manage or derive their business from this natural beauty – such as food, drink, forestry and tourism.'



Dovedale, Peak District National Park
Tourism in our finest landscapes is vital to the economy and supports local jobs and businesses

¹ 'Valuing England's National Parks' (2013) by Cumulus Consultants for National Parks England: <http://www.nationalparksengland.org.uk/home/policy/valuing-national-parks>

² 'The value of AONB partnerships' by Land Use Consultants for the National Association of AONBs: http://www.forestofbowland.com/files/uploads/pdfs/value_of_aonbs_report_final.pdf



Sustainable development?

In 2011, the Government announced its intention to consult on whether the statutory purposes for National Parks needed to better reflect their role in sustainable development. There was a suggestion that National Parks could be given a third statutory purpose to promote sustainable development, in addition to their existing purposes to conserve and enhance natural beauty and promote recreation opportunities. There was strong opposition to this idea due to concerns it could open the floodgates to new development in National Parks. The consultation was subsequently dropped.

The debate was reignited in September 2013 in a Westminster Hall debate about National Parks and Planning³. The Planning Minister, Nick Boles MP, responded for the Government and talked about the ‘danger of making rural communities into museum pieces where they are not so much protected as embalmed.’ He continued ‘That applies to many communities within National Parks; they will retain their life and appeal only if they are allowed to change and develop, and if people can get jobs and set up businesses.’

The Planning Minister went on to say that he would welcome ‘a conversation with MPs and other representatives of all National Parks about ‘the balance between growth, development, economic and social development and protection of the landscape and whether current legislation properly captures what we are trying to achieve and what communities in national parks want.’ He closed by saying that he would like to ‘reach a better understanding of what we might do so that National Parks remain the proudest jewels in the crown of the English landscape, while also being living communities that grow, develop and thrive.’ We welcome a discussion and agree with the aspirations set out by the Planning Minister. We would be alarmed if the somewhat contradictory Government proposal for a third statutory purpose for National Parks were to resurface.

DANGER OF MAKING RURAL COMMUNITIES INTO MUSEUM PIECES WHERE THEY ARE NOT SO MUCH PROTECTED AS EMBALMED
NICK BOLES MP, PLANNING MINISTER



Hole of Horcum, North York Moors
National Parks must conserve natural beauty and promote opportunities for recreation

³ Westminster Hall debate, National Parks (Planning Policy), 11 September 2013: <http://www.theyworkforyou.com/whall/?id=2013-09-11a.297.0>



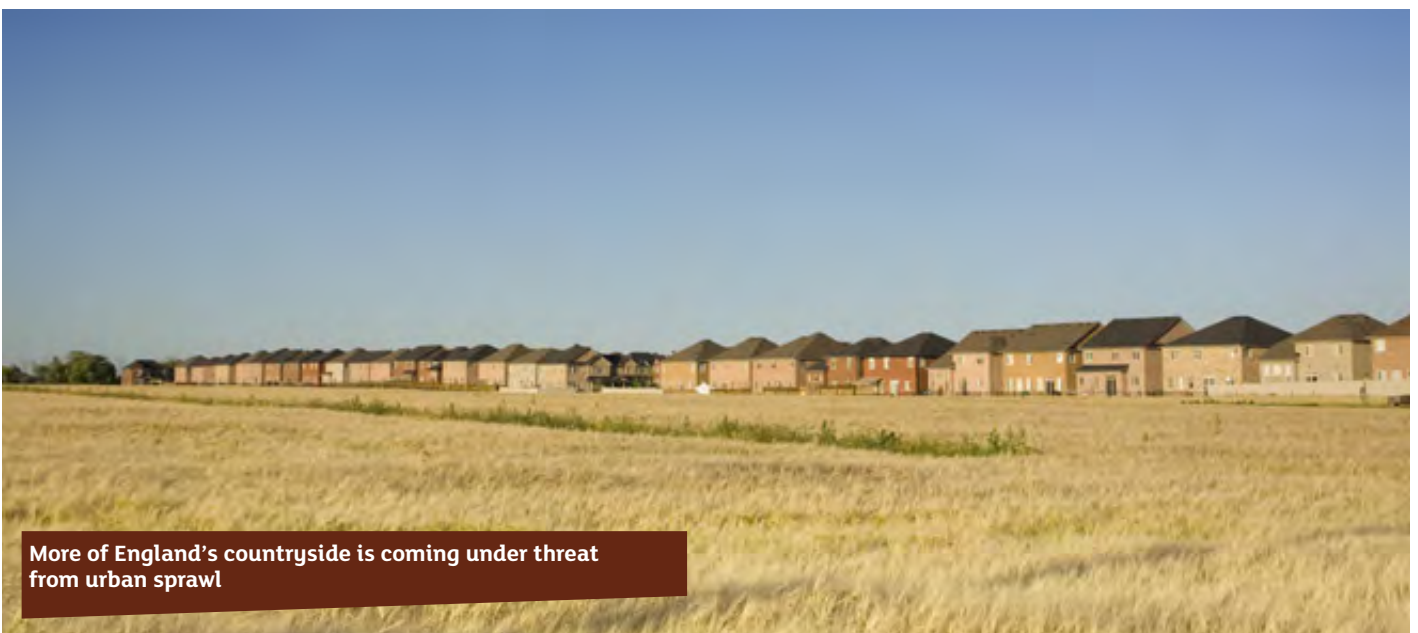
Both the Prime Minister and the Secretary of State for Communities and Local Government have spoken of their intentions to safeguard National Parks and AONBs. In September 2011, David Cameron, wrote to the National Trust to attempt to reassure them about the proposed planning changes⁴. He commented ‘We must ensure the appropriate protections for our magnificent countryside. This is why our reforms will maintain protections for the green belt, for National Parks and Areas of Outstanding National Beauty. Poorly-designed and poorly-located development is in no-one’s interest. Our aim is to secure a planning system that supports growth and prosperity and protects the interests both of today’s communities and of generations to come.’

In March 2013, Eric Pickles the Secretary of State for Communities commented in the Telegraph⁵ ‘our reforms safeguard our glorious green spaces and countryside. They protect the Green Belt – that vital green lung that prevents urban sprawl. And they defend Areas of Outstanding Natural Beauty, and other important environmental designations. Nothing will change that today. Nothing will change that tomorrow.’

It appears that despite the Government’s good intentions, in practice they have created an atmosphere where *all* development is seen as *good* development. This has put all undeveloped land in England under intense pressure. And when even our protected countryside is at risk, what hope is there for our unprotected but equally loved ‘ordinary’ countryside?

WE MUST ENSURE THE APPROPRIATE PROTECTIONS FOR OUR MAGNIFICENT COUNTRYSIDE. THIS IS WHY OUR REFORMS WILL MAINTAIN PROTECTIONS FOR THE GREEN BELT, FOR NATIONAL PARKS AND AREAS OF OUTSTANDING NATIONAL BEAUTY
DAVID CAMERON, PRIME MINISTER

AND THEY DEFEND AREAS OF OUTSTANDING NATURAL BEAUTY, AND OTHER IMPORTANT ENVIRONMENTAL DESIGNATIONS. NOTHING WILL CHANGE THAT TODAY. NOTHING WILL CHANGE THAT TOMORROW
ERIC PICKLES MP, SECRETARY OF STATE FOR COMMUNITIES



More of England’s countryside is coming under threat from urban sprawl

⁴ The Telegraph, 20 September 2011: <http://www.telegraph.co.uk/earth/hands-off-our-land/8777913/David-Camerons-letter-to-National-Trust-in-full.html>

⁵ The Telegraph, 26 March 2013: <http://www.telegraph.co.uk/comment/9955462/Trust-me-I-wont-let-the-bulldozers-wreck-Middle-England-Eric-Pickles-tells-Telegraph-readers.html>



Resources to care for National Parks and AONBs

CPRE is concerned that our designated areas are under further pressure from funding cuts, both from Government and constituent local authorities. For example, in the Peak District National Park, as part of the need to slash spending by £365,000, six national park staff faced redundancy at the end of 2012. The Chairman of the Park Authority said at the time 'While we have minimised the impact on jobs as much as possible you cannot make savings of that scale without having an effect on the service we provide to the public.'⁶

National Parks

Research published by National Park England¹ revealed that:

- The Government funded National Park Grant for 2011/12 of £55 million is equivalent to around £1 per annum per person in England.

The National Park Grant is reducing over five years from 2010/11 to 2014/15, as part of the Government's comprehensive spending review. Excluding the newly designated South Downs (which experienced an increase in its budget in the first two years associated with its start-up phase) the National Park Grant is:

- Decreasing by £12.5 million from £48.9 million in 2010/11 to £36.4 million in 2014/15. This equates to a reduction of 26% in cash terms, or 36% in real terms once the effect of inflation is taken into account;
- By 2014/15, the total National Park Grant for all ten National Parks (including the South Downs) is projected to be £46.6 million, equivalent to 88p per person in England.

The Department for Environment, Food and Rural Affairs has recently had its budget cut by 9.6% and this is likely to have an impact on National Park budgets. A further reduction in the National Park Grant for 2014/15 or beyond will reduce the ability of the NPAs to deliver their core functions and services and also reduce the capacity of NPAs to attract in matched or levered in funding for projects. All NPAs have been through a significant prioritisation process and have dropped areas of work to manage the reduced income. NPAs are, wherever possible, looking at ways of developing recurring revenue income streams. Project grants vary considerably in amount between years and do not generally contribute to the delivery of core functions and services.¹



Footpaths in National Parks are at risk from funding cuts

⁶ Grough online magazine, 11 December 2012: <http://www.grough.co.uk/magazine/2012/12/11/six-peak-district-authority-jobs-to-be-axed-as-budget-cuts-bite>



Areas of Outstanding Natural Beauty

AONBs are also reliant for their core funding in direct grants from Defra which is used to underpin the employment of staff and other core operational costs. Research published by the National Association shows that in 2013:

- The 34 AONB Partnerships will receive £6.6 million as core funding from Defra which makes up 75% of funding for core functions, matched 25% by local authorities within each AONB area;
- The £6.6 million core funding is used to generate a further £10.2 million of income into the AONB Partnerships from other sources;
- Defra's core grant equates to an annual contribution from central government of 19p per person for the 34.9 million people who live within half an hour's travel of AONBs in England, or 14p for the population as a whole;
- Any reduction in funding from central government would be matched by equivalent reductions from local authorities;

- Further reductions in central government funding (greater than 5%) could result in smaller AONB Partnerships having no choice but to dissolve and the core functions of delivering the AONB purpose would be absorbed within local authority structures. Local authorities are, in many cases, already reducing countryside and environment departments so without the AONB Partnerships the future management of some AONBs may be at risk.

CPRE believes that National Parks and AONBs deserve secure funding so they can plan ahead for the future. Government should recognise the benefits they bring to the nation through the happiness and well-being of visitors, the high quality of landscape and resource management by the National Park Authorities and the role of the Parks in supporting English tourism. Areas of Outstanding Natural Beauty also face an uncertain future as local authority budgets are cut and money for the management of AONBs comes under greater pressure.



Shropshire Hills Area of Outstanding Natural Beauty
AONB's offer the same benefits as National Parks on a smaller scale



Further pressures

Permitted development rights

In addition to the growth agenda and funding pressures, the Government is currently considering extending permitted development rights (PDRs) for farm buildings to be converted to non-agricultural use. This may result in uncontrolled, sporadic development of agricultural buildings into housing which would undermine the plan-led system and the Government's localism agenda intended to give communities a greater say in planning decisions. CPRE is pressuring for these proposals to be dropped but at the very least we believe that National Parks and AONBs should be exempt from new permitted development rights. We are concerned that it could result in inappropriate housing being developed outside of the planning system in a way that could have a dramatic suburbanising effect on the landscapes of these areas.

The Campaign for National Park reiterates these concerns⁷ by stating that 'National Park Authorities already have policies in place to allow conversion of agricultural buildings for residential use where the location, scale and character are appropriate. If the requirement for planning permission is removed then National Park Authorities will lose their ability to manage and monitor the potential impacts of changes of use including the cumulative impacts within an area. National Parks contain a high number of the buildings which could potentially be affected by this proposal, for example, there are around 4,500 field barns in the Yorkshire Dales National Park, many of which are in locations which would be completely inappropriate for residential use. We do not believe that the changes should be introduced at all but if they are then they should not apply in National Parks.'

Biodiversity Offsetting

The Government is also currently considering how to implement a Biodiversity Offsetting scheme in England. The aim would be that any development that had attempted to avoid, mitigate and then compensate for damage to a site could, as a last resort be required to offset the damage elsewhere. The success of the scheme will depend on the final details but CPRE is concerned that the potential landscape impact of offsetting has not been addressed in the Biodiversity Offsetting Green Paper⁸. There are also concerns

about how to measure habitat value and contribution to landscape character through the proposed metric, which would be the method used to quantify impacts on biodiversity. The assessment of habitat value could be too subjective to ensure that adequate offsetting is proposed. If these major issues can be satisfactorily addressed, a mandatory scheme, with thresholds to determine the scale of development that would require offsetting is the best way to ensure that biodiversity offsetting becomes part of the planning process.

For the scheme to be successful it will also require a robust and effective delivery support network. This will need to include upskilling local authorities to implement/enforce the scheme, the creation of 'go between' environmental consultancies who could act for the developer and advise on potential offsetting and the capacity of landowning bodies who may deliver offsetting on the ground. All of this would require additional rather than reduced funding.



The iconic barns of the Yorkshire Dales National Park could be converted to residential use in inappropriate locations

⁷ 'Proposals to make barn conversions easier will damage National Parks' Campaign for National Parks press release, 15 October 2013: <http://www.cnp.org.uk/article-details/792/news-and-resources>

⁸ Defra Biodiversity Offsetting Green Paper consultation: https://consult.defra.gov.uk/biodiversity/biodiversity_offsetting

Threats to National Parks, AONBs and locally valued landscapes

National Parks and AONBs are often referred to as the jewels in England's crown. They are landscapes of the highest quality, covering almost 25% of England. The designations mean that they should be protected from major development, unless it is deemed to be in the national interest and shown that no other suitable site exists. In practice, both National Parks and AONBs are under a growing threat from inappropriate developments. Some of these threats arise as a result of national policies, for example the national road strategy, and others as a result of a combination of national and local factors such as a lack of five year land supply for housing.

There have long been development threats in England's National Parks and AONBs. But, despite Ministerial assurances, the National Planning Policy Framework (NPPF)⁹, which came into force in March 2012, has done nothing to stem the tide of applications to develop in our most precious landscapes. In fact, research by CPRE earlier this year found that over half (52%) of local authorities did not have up to date adopted local plans in place¹⁰. As a result, they are under increased pressure to approve any application for housing development in line with policies in the NPPF, rather than with local views. In other areas, little or no time is being given to develop neighbourhood plans before schemes are approved. If our designated landscapes are not safe from inappropriate development, what does this mean for the wider locally valued countryside?

CPRE's analysis of the pressures affecting our most precious countryside also includes threats to undesignated areas that are valued by local people or with an existing local authority landscape designation such as an Area of Great Landscape Value or Coastal Protection Area. One of the core planning principles in the NPPF is to 'recognise the intrinsic character and beauty of the countryside'. It is therefore disturbing that little weight is being attached to locally valued landscapes.



The national road strategy could encourage new road building through valued landscapes

⁹ National Planning Policy Framework, Department for Communities and Local Government, March 2012: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹⁰ 'Countryside Promises, Planning Realities' CPRE (2013): <http://www.cpre.org.uk/resources/housing-and-planning/planning/item/3260-countryside-promises-planning-realities>



How should nationally and locally important landscapes be protected?

National Parks and Areas of Outstanding Natural Beauty should have the highest level of landscape protection

Designated landscapes are deemed to have the highest level of landscape protection in planning terms. The protection for National Parks and Areas of Outstanding Natural Beauty continues in the NPPF, at least in theory. Paragraph 115 states 'Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in the National Parks and the Broads.'

Major development

Paragraph 116 of the NPPF, the current rules on planning, sets out the approach to major development: 'Planning permission should be refused for major developments in these areas (National Parks and AONBs) except in exceptional cases and where it can be demonstrated to be in the public interest.' The paragraph continues 'consideration of such applications should therefore include an assessment of i) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy; ii) the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and iii) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.'

CPRE was concerned at the omission of text in the NPPF that was in the previous planning policy: Planning Policy Statement 7: Sustainable Development in Rural Areas (PPS7). This stated that 'applications for all such [major] developments should be subject to the most rigorous examination' and 'Planning authorities should ensure that any planning permission granted for major developments

in these designated areas should be carried out to high environmental standards through the application of appropriate conditions where necessary'.

In practice though this should not cause any problems in National Parks as the National Park Authority is the planning authority in these areas and would, as standard, subject any applications for major development to rigorous examination and high environmental standards. However, we are concerned that the omission in the NPPF is likely to leave AONBs more vulnerable to development as planning decisions are made by constituent local authorities and approaches to assessing major development vary.



Exmoor National Park, Devon
Protected for its landscape and scenic beauty

Uncertainty about what constitutes ‘major development’ has also caused variations in approaches by local planning authorities. A legal opinion was sought by the South Downs National Park Authority prior to the NPPF coming into force. In the opinion of Landmark Chambers ‘major development, for the purposes of paragraph 22 of PPS7 is any development which, by reason of its scale, character or nature, has the potential to have a serious adverse impact on the natural beauty and recreational opportunities provided by a National Park or AONB. That does not require an in-depth consideration of whether the development will have such an impact. Instead, it requires a prima facie assessment of the potential for such impact.’

The opinion continues to say that ‘assessing whether a proposed development is a “major development” is a matter of judgment based on all the circumstances, not on criteria alone.’ However, criteria may be used to make a presumption that a development is a “major development”, which may include whether an Environmental Impact Assessment is required or the developments falls under certain schedules of the Town and Country Planning Regulations 1999 or the Town and Country Planning 2010 Order.

Protecting locally valued landscapes

Research published by CPRE in late 2011 found that 55% of English countryside is unprotected by a nationally recognised designation, such as National Park, AONB, Site of Special Scientific Interest or Green Belt. Full details of this analysis and its implications for protecting the countryside can be found in CPRE’s *Protecting the wider countryside*¹¹ report. The report highlighted the importance of non-statutory landscape designations which operate through the planning system in protecting ‘ordinary’ countryside from inappropriate development. Although the NPPF does not mention recognition for local landscape designations as existed under the previous planning regime (PPS7), we welcome recognition of the ‘intrinsic value of the countryside’ as one of its core planning principles.



Unprotected countryside is highly valued by local people

¹¹ ‘Protecting the wider countryside’ CPRE (2012): <http://www.cpre.org.uk/resources/housing-and-planning/planning/item/2728-protecting-the-wider-countryside>

Making use of the Local Green Space designation

The 2010 Liberal Democrats Manifesto¹² set out their intention to ‘create a new designation – similar to Site of Special Scientific Interest status – to protect green areas of particular importance or value to the community.’

The new ‘Local Green Space’ (LGS) designation aims to enable local communities, through local and neighbourhood plans, to identify for special protection areas of particular importance to them. Paragraph 76 of the NPPF states that ‘By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as LGS should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. LGS should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.’ However, paragraph 77 opens ‘The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used i) where the green space is in close proximity to the community it serves ii) where the green area is demonstrably special to a local community and holds a particular local significance, e.g. because of its beauty, history, recreational value, tranquillity or richness of its wildlife and iii) where the green area concerned is local in character and not an extensive tract of land.’

When the new LGS designation was first mooted it appeared the intention was to produce comprehensive guidance for local authorities on how to use it. However, the Government has decided that in the spirit of localism local councils

should decide on their own criteria for LGS. Leicestershire County Council is an example of a local authority that has initiated work on detailing LGS policy. Draft Planning Practice Guidance on the Local Green Space designation has recently been published. CPRE is concerned about the potential interpretation of this guidance and has sought clarity on a number of points, for example the definition of an ‘extensive tract’ of land that the designation could not be applied to and how the new LGS designation will sit alongside existing local landscape designations (such as Areas of Great Landscape Value).

In response to a Parliamentary Question in March 2012, Bob Neill MP (then Parliamentary Under Secretary of State at the DCLG) stated ‘Local planning policy designations in a local plan will continue to be a material consideration, and our proposed reforms will mean that local plans have a more important role in the planning process.’ This suggests that locally valued landscapes designated as a Local Green Space in a local plan should receive strong protection.

LOCAL PLANNING POLICY DESIGNATIONS IN A LOCAL PLAN WILL CONTINUE TO BE A MATERIAL CONSIDERATION, AND OUR PROPOSED REFORMS WILL MEAN THAT LOCAL PLANS HAVE A MORE IMPORTANT ROLE IN THE PLANNING PROCESS

BOB NEILL MP



Brill, Buckinghamshire
CPRE rewarded a community project to enhance the village common

¹² Liberal Democrat Manifesto 2010, page 82: http://www.libdems.org.uk/our_manifesto.aspx

Threats to England's landscapes

NORTH PENNINES AONB:
 Opencast mining
A refusal to allow 560,000 tonnes of coal to be mined from a site in the AONB was recently overturned

PEAK DISTRICT:
 Transpennine road route
Dualling of the A57 between the M67 on the edge of Manchester through the National Park to the M1 at Sheffield

SHROPSHIRE HILLS AONB:
 Wind turbines
Proposal to install 8 turbines on Brown Clee, visible from the AONB

MALMESBURY, WILTSHIRE:
 Housing development
Speculative urban edge greenfield developments threaten the character of this historic town

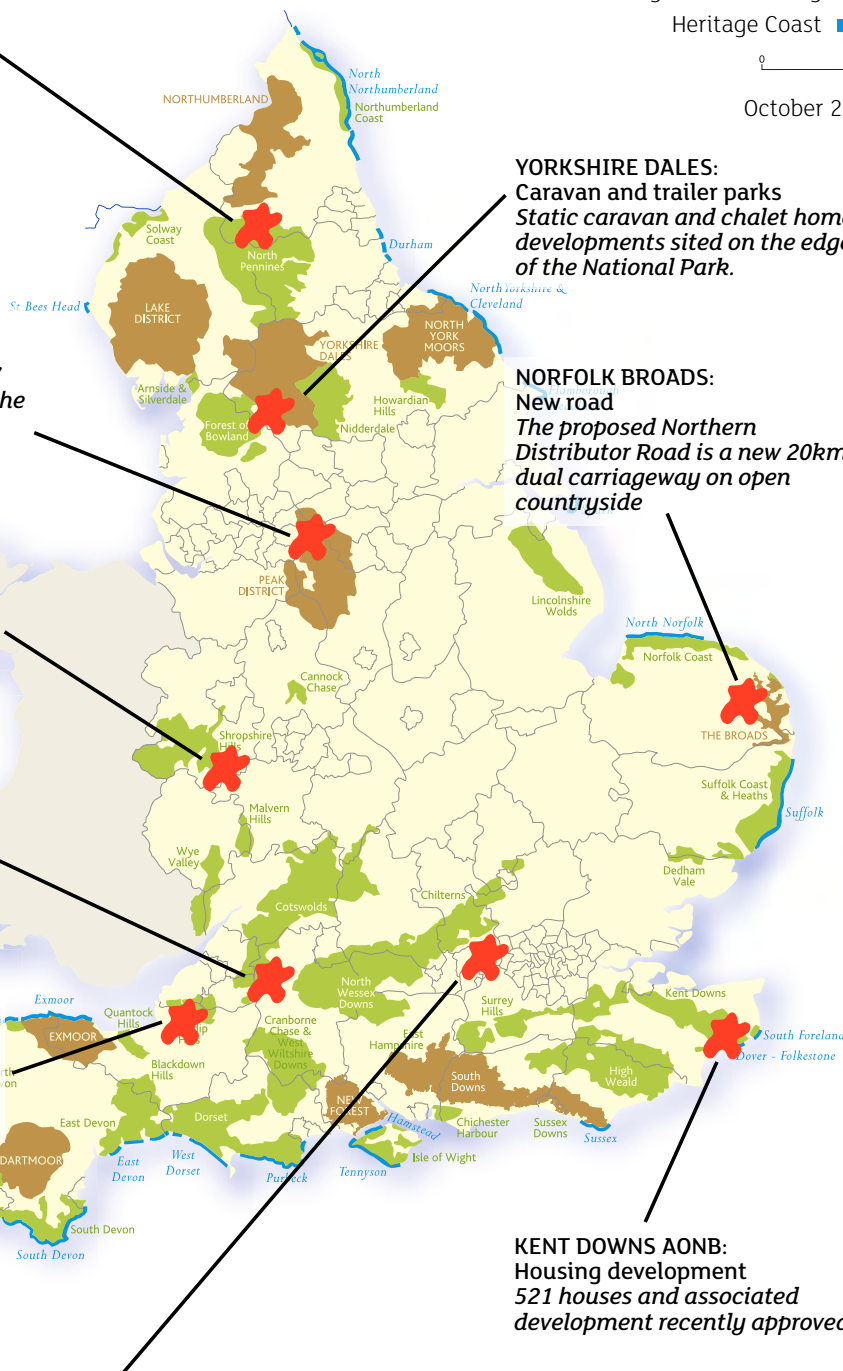
MENDIP HILLS AONB:
 Cheddar Gorge cable car
A cable car would undermine local tranquillity and harm the beauty of this iconic landscape

SWINLEY FOREST, BERKSHIRE
 Winter Wonderland Theme Park
Granted temporary permission for three years in a locally valued forest

National Parks ■
 Areas of Outstanding Natural Beauty ■
 Heritage Coast ■

0 50km

October 2013



YORKSHIRE DALES:
 Caravan and trailer parks
Static caravan and chalet home developments sited on the edge of the National Park.

NORFOLK BROADS:
 New road
The proposed Northern Distributor Road is a new 20km dual carriageway on open countryside

KENT DOWNS AONB:
 Housing development
521 houses and associated development recently approved

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Review of cases

To illustrate the range of development cases affecting valued landscapes 23 CPRE branches gave us at least one example of a current threat they were engaged with. There are of course many development proposals in each area at any one time, many of which will be acceptable in terms of landscape impact. This report highlights at least one example to show the range of development threats facing both designated and undesignated countryside in each area. The map opposite shows some of the case studies around the country. The full range of case studies and the landscapes they affect is shown in the table below.

Energy

Onshore wind

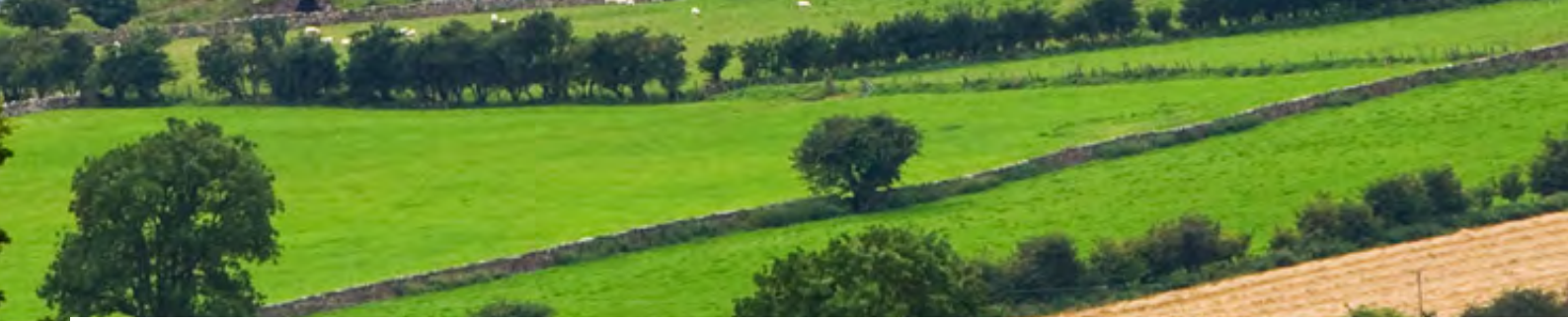
Energy development is a major issue facing the countryside. Friends of the Lake District (FLD), CPRE’s representatives in Cumbria, highlighted concern over the cumulative impact of wind farms surrounding the Lake District National Park. They reported that ‘numerous wind farms have been permitted mainly through the appeals process. A strategic overview is missing as each separate local planning authority bordering the National Park considers their individual proposals without reference to cumulative impact upon the Lake District as a whole.’ This issue is particularly acute in Allerdale, between the Lake District National Park and the

Solway Coast, and in the Lune Valley between the Lake District and Yorkshire Dales National Parks. Other examples of wind farms are in Hampshire, where EDF has applied to install 14 turbines in locally valued landscape on a site that would be visible from the North Wessex Downs AONB; and in Shropshire, where there are currently five applications for a total of eight wind turbines on the lower slopes of hills on the edge of the Shropshire Hills AONB.

This issue raises questions about how to deal with planning applications near the boundaries of National Parks and AONBs. CPRE has long argued that consideration should be given to the ‘setting’ of these designated areas and we called, unsuccessfully in the end, for this issue to be specifically addressed in the final NPPF. Some National Park Authorities and AONB Boards have adopted a policy to provide guidance to local planning authorities, landowners and other interested parties regarding the consideration of the impact of development and land management proposals which lie outside the AONB but within its “setting”. One example of a policy adopted by designated landscapes is in the Cotswolds AONB which states *‘The Board considers the setting of the Cotswolds AONB to be the area within which development and land management proposals, by virtue of their nature, size, scale, siting, materials or design can be considered to have an impact, positive or negative, on the natural beauty and special qualities of the Cotswolds AONB.’*

Type of development	Number of cases highlighted		
	National Park	AONB	Locally valued landscape
Transport	✓ ✓	✓	✓
Housing	✓	✓ ✓ ✓	✓ ✓ ✓ ✓
Energy	✓ ✓	✓ ✓ ✓ ✓ ✓	✓ ✓ ✓ ✓ ✓ ✓
Tourist Attraction		✓	✓

N.B there are three cases that affect both AONB and locally valued landscape and one case that affects both a National Park and locally valued landscape.



Large scale solar development

Large scale solar 'farms' are proposed in an Area of Great Landscape Value in Dorset, the Suffolk Coast and Heaths AONB and the South Downs National Park. In Dorset, CPRE is campaigning against a 28MW solar development on a locally designated site near Blandford Forum, which would be the largest solar installation in the South West and one of the largest in the country. A 4.39MW solar scheme, including associated buildings, has recently been approved on a 10.7 hectare site within the Suffolk Coast and Heaths AONB. The local CPRE group argued that the development of the site with 18,000 PV panels would change the character of the AONB by industrialising the landscape. There is insufficient evidence to show that the development met the major development test in the NPPF.

CPRE Sussex recently opposed an application for a 15MW 20.2 hectare solar farm in the South Downs National Park, due to the impact on high quality and the visual blight it would cause in England's newest National Park. The South Downs National Park Authority has requested an Environmental Impact Assessment from the developers and the application was withdrawn in its current form. A revised proposal is expected at some point in the future.

There are increasing concerns about the impact of increased levels of large scale solar energy development in the countryside. This is a particular issue where developments are proposed on 'best and most versatile' agricultural land, which is classified as Grades 1, 2 and 3a in the agricultural lands classification system, which is our most productive farmland.

The Government published planning guidance in June 2013 on renewable and low carbon energy¹³. The guidance states that while there is a need for more green energy this 'does not mean that the need for renewable energy automatically overrides environmental protections and the planning concerns of local communities.' It also states that where councils have identified suitable areas for onshore wind or large scale solar farms, 'they should not have to give permission outside those areas for speculative applications'. The guidance set out how policies for inclusion in local plans should be developed. Cumulative impacts, local topography, heritage assets and local amenity are all mentioned. While environmental protections are referred to, the weight given to National Parks and Areas of Outstanding Natural Beauty is disappointingly weak and simply states that proposals in these areas, or areas close to them, 'will need careful consideration'.



Solar farms are raising concerns about landscape impact

¹³ 'Planning practice guidance for renewable and low carbon energy' Department for Communities and Local Government, July 2013: http://www.planningportal.gov.uk/general/news/stories/2013/october13/171013/171013_1



In October 2013, Communities Secretary Eric Pickles announced he had decided to recover a selection of onshore renewable energy schemes, chiefly wind and solar farms, to see whether the latest planning practice guidance is meeting the Government's intentions.¹⁴ This exercise is set to last six months.

In a written Commons statement he said: 'The national planning policy framework includes strong protections for the natural and historic environment. Yet, some local communities have genuine concerns that when it comes to developments such as wind turbines and solar farms insufficient weight is being given to local environmental considerations like landscape, heritage and local amenity. 'I want to give particular scrutiny to planning appeals involving renewable energy developments so that I can consider the extent to which the new practice guidance is meeting the Government's intentions. To this end, I am hereby revising the appeals recovery criteria and will consider for recovery appeals for renewable energy developments.

'For the avoidance of doubt, this does not mean that all renewable energy appeals will be recovered, but that planning ministers are likely to recover a number of appeals

in order to assess the application of the planning practice guidance at national level.' CPRE will be monitoring this closely to see what difference it makes to planning decisions.

Other energy-related threats that the CPRE branches highlighted include an application for an opencast coal mine in the North Pennines AONB. The application was refused at Public Inquiry but after a legal challenge by UK Coal a second Public Inquiry was ordered by the High Court. In Gloucestershire, an 'energy from waste' incinerator on the edge of the Cotswolds AONB was recently refused by the County Council although the developer has appealed against this decision. Fracking for shale gas is a divisive issue that has attracted much media attention in recent months. CPRE Lancashire was concerned when, at the end of 2012, the Department for Energy and Climate Change authorised the resumption of shale gas exploration in locally valued landscape in Fylde. It is estimated that the drilling company may require at least 800 wells to be developed over 80 well pads, which would have a detrimental impact on the landscape, in addition to other environmental concerns. If the shale gas is to be exploited, CPRE believes there should be a very strong presumption against drilling for shale gas in nationally protected areas. A CPRE Policy Guidance Note on this issue will be published shortly.¹⁵



The Communities Secretary has raised concerns that landscapes have been given insufficient weight in deciding wind farm applications

¹⁴ 'Minister puts green power schemes under spotlight.' Planning Portal, 17 October 2013: http://www.planningportal.gov.uk/general/news/stories/2013/october13/171013/171013_1

¹⁵ Refer to CPRE's website for news: <http://www.cpre.org.uk/resources/energy-and-waste>

Housing

It is a particular concern that many designated landscapes are coming under unprecedented pressure for large scale housing development. CPRE recognises the great need for new housing in many areas. We do not believe this requires major development in our most valued countryside. In July 2013, CPRE launched a three point *Charter for the Countryside*¹⁶ which calls for better protection for our beautiful countryside; a fair say for local communities; and more housing in the right places. The principles embodied in the Charter should enable us to meet the nation's housing needs while protecting the countryside from damaging development.

Many of the CPRE branches are concerned about unsuitable housing proposals in their areas. In Devon, an application was recently approved to build 20 houses on a hillside in Dawlish which is treasured by the local community for its sweeping coastal views. The site is designated as a Coastal Preservation Area and should therefore remain 'substantially unaffected by development' according to the County Structure Plan. CPRE Devon believes that the reformed planning system has played a key role in this development gaining approval. In addition, the Secretary of State for Communities, Eric Pickles MP, has recently approved a major development of 350 houses in a locally designated area near Dawlish.

In June this year, Dover District Council approved a development of 521 houses, partly within the Kent Downs AONB, on the grounds that it may help regenerate the economy and lack of a five year land supply for new housing. Requests were made to the Secretary of State to call in the application but he refused despite the Government's own policy on development in designated areas and insufficient evidence that it met the major development test in the NPPF.

THESE QUANGOS ARE SIMPLY OUT OF CONTROL – ESPECIALLY AS NO-ONE CAN ACTUALLY SEE THE SO-CALLED AONB WHICH IS BROADLY A FAIRLY UNINTERESTING AND ECOLOGICALLY WORTHLESS PIECE OF SCRUBLAND

CHARLES ELPHICKE MP

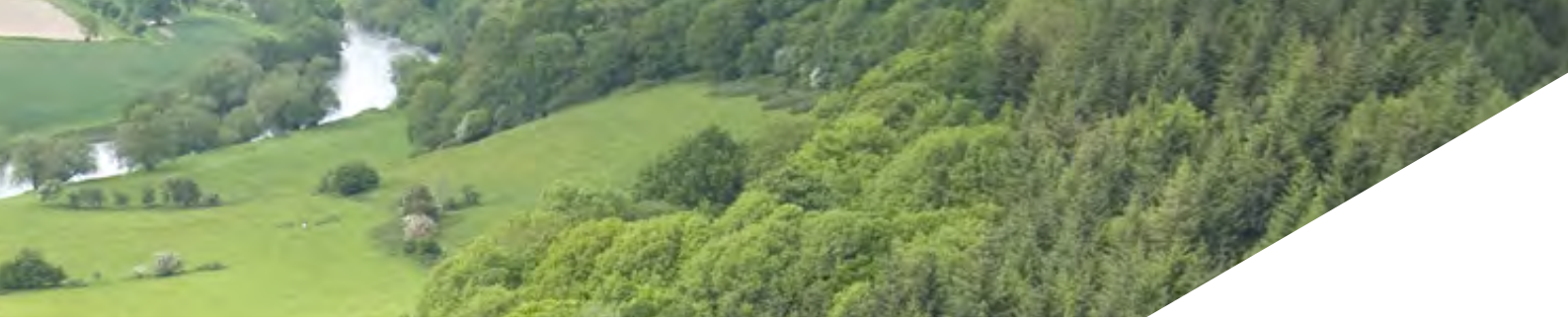
Alarming, the Leader of the Council wrote to the Planning Minister Nick Boles MP after the decision stating the Council's reasons for approving the development, and closed with the statement 'Moreover, it will send a clear message that Dover is open for business and, as part of the wider East Kent area, is able to also support the ever growing success of the Discovery Park Enterprise Zone and the emerging spin-off investments which are now coming forward.'

The local MP Charles Elphicke also wrote to Nick Boles to request a meeting about the development proposal and was critical of the concerns voiced by expert organisations such as Natural England and the Kent Downs AONB Unit. The MP said 'While many of the District council's building programme proposals have caused upset, this development is popular and wanted by the people of my community. Sadly the Quangos who represent no-one but themselves and their special lobbying interests have been seeking to put a spanner in the works.' He continued 'These Quangos are simply out of control – especially as no-one can actually see the so-called AONB which is broadly a fairly uninteresting and ecologically worthless piece of scrubland.'



**The Kent Downs AONB
Under threat from 'major development'**

¹⁶ CPRE's Charter for the Countryside: <http://www.cpre.org.uk/>

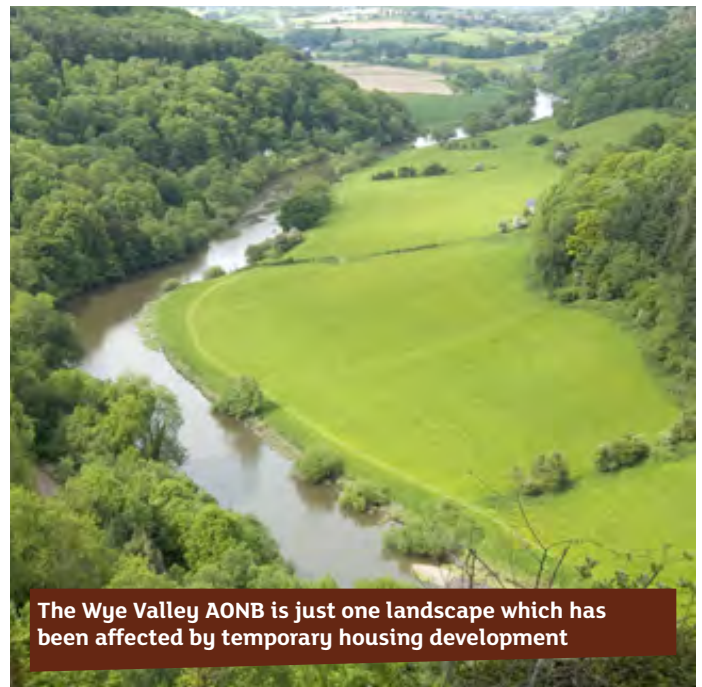


Housing development is also currently threatening the setting of a village in Oxfordshire and a town in Wiltshire. There are two applications for large scale housing developments in Oxfordshire, which if approved would join the village of Great Coxwell to the neighbouring town of Faringdon, developing the locally valued countryside that currently lies between the two places. The current lack of an approved Local Plan and an inadequate five year housing supply means that developers have been quick to seize the opportunity to put forward planning applications that would not normally be considered. In Wiltshire, the setting of Malmesbury, a historic market town famed for its seventh century Abbey, is threatened by cumulative development applications despite having protective planning policies in process.

The lack of a five year land supply in the High Weald AONB means that the area is facing huge housing pressures with applications for 200 houses near Hawkhurst; 250 at Cranbrook and 200 at Battle, along with major urban extensions at Heathfield and Crowborough. The local authority is under pressure to approve these schemes due to a lack of a five year land supply despite their cumulative impact on the AONB. The effective protection of ancient woodland is also under threat as the council's buffer zone policy for development near ancient woodland is becoming difficult to enforce.

Temporary housing structures also pose a threat to the setting of the Yorkshire Dales National Park and Wye Valley AONB. In Yorkshire, there is an influx of static caravan and park home sites both on the edge of the National Park and within the park itself. Many of these sites have become permanent homes despite planning permission being given for temporary use. The developments have caused increased

pressure on local services and are visually damaging in the landscape. In the Herefordshire Wye Valley retrospective planning permission is being sought for two caravan sites for 450 temporary agricultural workers who work in the polytunnels on the site. Associated facilities were also built, without planning permission. The Secretary of State for Communities issued a 'Screening Direction' to Herefordshire Council earlier this year, requiring an Environmental Impact Assessment although so far this has not been complied with. CPRE Herefordshire is concerned about the cumulative impact of the caravan sites, associated structures and the extensive use of polytunnels in the Wye Valley AONB.



The Wye Valley AONB is just one landscape which has been affected by temporary housing development

Transport

Transport infrastructure is becoming an increasingly contentious issue in our National Parks, AONBs and locally valued landscapes. In July, the Department for Transport and the Highways Agency published *'Action for Roads'*¹⁷, which called for the biggest road-building programme since the 1970s. In July, together with the Campaign for Better Transport and other charities, CPRE published a map¹⁸ showing how this could threaten five National Parks and many AONBs. One of the proposals was to identify and fund a feasibility study for trans-Pennine road routes between Sheffield and Manchester. CPRE Peak District and South Yorkshire have successfully opposed a motorway, dual carriageway and a bypass in recent years. But the Treasury's desire for a huge road building programme to stimulate economic growth means the study is likely to resurrect proposals for major road expansion through the Peak District National Park. The CPRE branch continues to call for policies that provide alternatives to cars and lorries rather than increasing traffic by building new roads.

In Norfolk, a major new 20km dual carriageway is proposed on locally valued open countryside to the north of Norwich. The county council see the 'Norfolk Distributor Road' as a route to growth, both in the economy and development. CPRE Norfolk is concerned that building the new road would destroy miles of countryside and that, in the long term, associated development would add to the destruction and urbanise land that is currently open countryside. Already pressure is mounting to dual the A47 as well, which would plough through the Norfolk Broads.

CPRE believes that a return to major road building projects would not only fail to solve congestion in the longer term – but in fact would make it worse – while devastating wide areas of countryside, including National Parks and AONBs. Many of the road schemes announced are along corridors

where improvements to the rail network are urgently needed and these should be prioritised first. CPRE believes that the Government should look for alternatives to road building, as these are often better for the economy while coming at far lower environmental cost.

High Speed 2 (HS2) is another major infrastructure project that would impact on the Chilterns AONB and valued local landscapes.

Although CPRE supports the principle of HS2 as part of a broader strategy to invest in the rail network and shift travel from road and air to rail, we are worried about the way it is being planned, as well as the impacts of the proposed route itself. Setting inflexible objectives for HS2, in particular a requirement to cater for running at 400km/h and linking to parkway stations at airports in the Green Belt, has seriously limited the range of route options considered and meant that HS2 may lead to sprawl.



A return to major road building would devastate wide areas of countryside

¹⁷ 'Action for Roads' Department for Transport, July 2013: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/212590/action-for-roads.pdf

¹⁸ 'Charities warn National Parks under threat from Highways Agency dual carriageways', 16 July 2013: <http://www.bettertransport.org.uk/media/15-july-NGO-roads-map>

Tourist attractions

England's countryside is one of our most important tourism and leisure assets. Commercial visitor attractions are also important to the tourism industry. However, we do not believe that the development of new tourist attractions should be at the expense of the countryside or natural beauty. A cable car is currently proposed at Cheddar Gorge, an iconic landscape feature in the Mendip Hills AONB. Longleat Estates own half of the Gorge and claim that a cable car is the only way to reinvigorate visitor numbers to the area. The other side of the Gorge is owned by the National Trust who, along with CPRE Somerset and a local campaign group, oppose the idea of a cable car due to the detrimental effect on the natural beauty of Cheddar Gorge. The Mendip Hills AONB Unit also opposes the development. Longleat Estates carried out a consultation exercise in March 2012 and a planning application is expected in autumn 2013.

In Berkshire, temporary permission was given to Lapland UK's application to turn an area of Swinley Forest into a 'winter wonderland' theme park development for a temporary three year period from winter 2013. The development was granted permission despite unanimous local opposition and without the completion of an Environmental Impact Assessment. Although the park will only be open for two months a year, its construction will have severe and potentially irreversible impacts for the unspoilt beauty and tranquillity of the forest, a Site of Special Scientific Interest, and nearby countryside.



Cheddar Gorge, Mendip Hills AONB



Conclusion

The case studies provided by CPRE branches illustrate the range of development threats to our National Parks, Areas of Outstanding Natural Beauty and locally valued landscapes. Despite designated landscapes supposedly having the highest level of protection in the NPPF, there is growing pressure on local authorities to approve inappropriate development.

Under the 'major development test' it seems increasingly easy for developers to argue that their proposal is in the national interest and would generate jobs and boost the local economy. The current Government's growth agenda means that local authorities feel under pressure to approve developments, even where there has been no serious attempt to meet the requirements of the major development test.

The one year implementation period for local authorities to comply with the NPPF has left many local authorities without an adopted local plan, which has left them vulnerable to development applications and without national policy backing to refuse unsuitable applications. This is a particular issue in AONBs and the wider countryside.

If designated landscapes are increasingly vulnerable to major development, then what does this mean for our wider countryside? The case studies provided by CPRE branches show that local landscape designations are being routinely overridden in planning decisions.

The views of local communities are all too often ignored. Even if a planning application is refused, the developer may appeal the decision which puts pressure on local authority resources. The ability of local communities' to pursue legal avenues themselves, for example by a Judicial Review of the case, appears increasingly limited.



Catbells, Lake District National Park

Recommendations

CPRE is calling for urgent action to be taken to ensure that a better balance is struck between the need for growth and a secure future for designated, locally valued landscapes and the wider countryside.

As a result of the evidence gathered in this report, CPRE is calling on Government to:

- strengthen national planning policy by giving greater weight to the protection of nationally designated and locally valued landscapes;
- recognise the contribution that National Parks and AONBs make to our economy and review cuts to their funding in advance of the imminent Spending Review;
- produce guidance for the Planning Inspectorate on implementing the major development test in National Parks and AONBs;
- ensure that requests for applications to be 'called in' by the Department for Communities and Local Government are dealt with in line with the major development test in the National Planning Policy Framework;
- exempt National Parks and Areas of Outstanding Natural Beauty from the proposed changes to permitted development rights concerning the conversion of farm buildings; and
- review the draft planning policy guidance to ensure that best use can be made of the new Local Green Space designation.

CPRE is also calling for an urgent Parliamentary Select Committee Inquiry to review how major development is dealt with in National Parks and Areas of Outstanding Natural Beauty in order to protect and enhance their natural beauty for future generations.



South Downs National Park, Sussex

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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