Written Evidence by the Campaign to Protect Rural England to Bright Blue's Conservation Policy | November 2018

Rural | *9. What are the most important public goods provided by the agricultural sector which should be rewarded through government funding?*

CPRE believes the enhancement of the landscape is the most important public good for Government to support. The English landscape has been simplified and homogenised over the last 70 years. For example, 7,250 km of hedgerows were lost each year between 1945 and 1970; less than half of the surviving managed hedges in Britain are classified as in 'good structural condition'; 95% of flower rich meadows were lost between 1945 and 1993; and overall, between only 1990 and 2004, 60% of the English landscape has changed in ways which are 'inconsistent' with its traditional character. This trend must be reversed.

All the goods listed in the *Agriculture Bill* are vitally important to well-being and our response to climate change. However, we need to maximise the benefits we get from individual actions rather than rely on single benefit approaches. This can be done using a landscape approach to deliver any scheme: synergies can be delivered by working with the grain of the landscape and reflecting local landscape character. For example, re-creating wildflower meadows on steeper slopes can prevent soil erosion, store soil carbon, and support pollinators, natural predators of cereal pests and ground nesting birds, as well as enhancing the landscape.

Natural England's National Character Areas (NCA) Profiles, which together cover the whole of England, provide an established spatial framework for targeting spending to support environmental outcomes. Each Profile defines an area of common landscape character and identifies specific opportunities for environmental improvement that enhance the landscape and bring wider public benefits. These are underpinned by County and District Landscape Character Assessments and, in some places, neighbourhood plans that can also be used.

CPRE believes that the conservation and enhancement of landscapes must be a core objective of policy and that landscapes everywhere are of value. As a signatory to the European Landscape Convention the UK should take landscape into account in all policies that might have a landscape impact. It cannot be assumed that the effect of other environmental actions, even if taken at the landscape-scale, will automatically result in enhanced landscapes. The answer is to deliver integrated approaches that enhance local landscape character and other public goods together.

Rural | *10. What are the key policies which the Government should introduce to better protect Britain's rural environments?*

A Land Use Strategy is needed in England to produce a comprehensive and holistic approach to land management. As outlined in CPRE's Landlines, an effective Land Use Strategy would: focus on community action-led approaches, allowing communities and local authorities to make the right decisions for their environment; review land use statistics and assess the amount of land required to meet various needs; optimise the use of land, taking into account interactions between different uses; Integrate consideration of land use into public decision making and investment; provide a better basis for accounting for the value of land in land use planning and management decisions.

The way land is managed is central to how the environment looks and functions to provide various critical services. A Land Use Strategy would enable the most efficient use of a limited resource which provides social, economic and environmental benefits. Such a joined-up approach could balance the requirements of housing, infrastructure and agriculture while optimising natural capital and ecosystem services such as clean water, flood management, abundant nature, healthy soils, places for recreation and beautiful landscapes. Critically, the strategy would encourage more informed and integrated decisions about how to use land in a sustainable manner. An English Land Use Strategy would therefore effectively support the Government's ambition to be the first generation to leave the environment in a better state than it inherited.

Urban | *4. Should more building be permitted on Green Belt designated land? If so, how should such development be carried out so as to minimise ecological harm (or maximise ecological benefit)?*

"*Before policy makers surrender to the direct interests of the developers, they should pause for thought. There is a viable third alternative that at least deserves proper analysis, and it is potentially rich in benefits. Instead of yet more urban sprawl, imagine a Green Belt with lots of natural capital, a much more environmentally benign agriculture, much greater public access, woodlands located next to people so it could fulfil not only the original purpose of limiting the sprawl but also provide the lungs of the cities, the fresh air for children to play in, and the recreational benefits which are crucial to health and wellbeing. That is worth exploring before the irreversible destruction of this major asset located exactly where it is needed – next to people. There is after all no shortage of land to build houses on if that is what is required. It does not have to be at the expense of a key asset that the previous generation left to us, and which we have a responsibility to pass onto the next generation.*" In Defence of the Green Belt, Professor Dieter Helm

CPRE does not believe that planning policy should be changed to allow more building to be permitted on Green Belt designated land. Instead, we believe that the current policy should be more robustly implemented so that there is a reduction in the overall level of development in, and changes to, Green Belt land.

Green Belt policy has always been very effective in preventing urban sprawl. However, the designation is now under pressure from both development proposals and some commentators calling for policy deregulation. The lessons of continental Europe and North America show that the particularly strong controls over development that Green Belt policy provides are needed around our largest towns and cities. Otherwise there would be urban sprawl and loss of productive farmland - the country would look very different if London sprawled outwards like Los Angeles. Green Belts remain strongly supported by the public: in 2015 64% of the public supported Green Belt policy, a figure rising to 72% in the south of England.

Green Belt policy is already flexible – in CPRE's view, too flexible. The current policy allows for Green Belt boundaries to be altered through the Local Plan process. Also, housing development should normally be 'inappropriate' in the Green Belt and therefore strictly controlled, but it is possible for such development to be allowed if there are 'very special circumstances'. CPRE does not oppose all Green Belt alterations, or all building within designated Green Belts. But Green Belt boundaries are now changing at the fastest rate for at least two decades. The vast majority of the land being allocated in plans is greenfield, and the number of houses being permitted on undeveloped greenfield land in the Green Belt has nearly doubled since 2012, from just over 1,600 per year to more than 3,300 in 2017/18.

CPRE's 2018 State of the Green Belt report published in August showed that there are currently 460,000 homes being planned to be built on land that will soon be released from the Green Belt. The report also demonstrates that building on the Green Belt is not solving the affordable housing crisis, and will not do so. Last year 72% of homes built on greenfield land within the Green Belt were unaffordable by the government's definition. Of the 460,000 homes that are planned to be built on land that will be released from the Green Belt, the percentage of unaffordable homes will increase to 78%. We believe that the increasing salami-slicing of the Green Belt needs to stop because:

- **There is a lack of affordable housing for people on average or lower incomes and/or needing rented housing, being provided on most new schemes in the Green Belt.** On sites where planning permission has been granted, only 16% of the houses permitted since 2009 will be affordable, and this total includes new student housing.

- **It is more difficult and costly to build housing at a large scale in the Green Belt than many of its detractors argue.** Recently, there has been a campaign to build a million new houses on 20,000 hectares of Green Belt land near to train stations on the edge of London. The claim assumes that the new housing will be built at the relatively high average density of 50 houses per hectare. In many cases this will simply not be possible on a Green Belt site, due to the need to also provide other supporting infrastructure such as roads, schools, sewerage and so on – the current average is 21 dwellings per hectare. The mapping underlying the claim does not take into account environmental assets such as public footpaths, ancient trees or hedgerows. Moreover, taking a general approach of building on Green Belt land close to train stations is likely to increase hope value, making it more difficult to provide affordable housing on the land.

- **Green Belts contain significant tracts of land that is ecologically valuable in its own right, but the designation has a social value that goes beyond the value of particular tracts.** Most Green Belt land is undeveloped farmland or woodland, and undeveloped green land can provide wellbeing benefits simply by being visible to people, as the Government's Natural Capital Committee has pointed out. We have the opportunity to manage Green Belt land better for farming, wildlife and people through retaining the commitment to long-term protection. We have found that environmental stewardship schemes cover 53% of all farmland in the Green Belt, and that 48 new Local Nature Reserves (LNRs) were created in the Green Belt between 2009 and 2015, representing 30% of all the new LNRs in England. In addition, 68,686 Ha of Green Belt land is registered as Sites of Special Scientific Interest (6% of all SSSI land in England). There are 8,490 Ha of National Nature Reserve (9% of NNR area). 34% of Community Forest land is within Green Belts (covering 32% of Green Belts by area). 13.6% of Green Belts are broadleaf and mixed woodland. 17% of total Ancient Woodland Area is within Green Belts. *Green Belt Factsheet.*

- **We can also foster new or increased rural business by more strongly relating farming in Green Belt and other urban fringe areas to the nearby urban populations**, by for example community-supported agriculture, care farming, and increased access for visitors. A report co-steered by CPRE in 2012 found a number of successful examples of such businesses, most if not all of which continue to thrive in 2018. (See Making Local Food Work, *Food from the Urban Fringe*, report from 2012 available from www.localfood.org.uk)

- **There is considerable scope to make better use of brownfield sites in urban areas both within and beyond the Green Belt.** Our campaigning led to local authorities now being required to produce brownfield registers, and these have already identified enough sites to provide 1 million new homes across England - much of which is in areas with existing infrastructure and a high need for housing. We should prioritise investment in cleaning up contaminated land and providing housing better linked to all the facilities of urban areas.

Alongside a genuine 'brownfield first' approach to development we believe the government should: retain its commitment to protect the Green Belt by establishing long-term boundaries; halt speculative development in the Green Belt; develop clear guidance for local authorities on housing requirements to protect designated land; support the creation of new Green Belts, particularly in and around Norwich and Southampton, where either local authorities have established a clear need for them or there is a clear public demand to do more to prevent urban sprawl and encourage urban regeneration.

Urban | *5. How important is access to green and blue space in urban areas and what policies could the Government adopt to improve access to such spaces in the UK?*

Green Belts help urban populations access the countryside by maintaining attractive landscapes for outdoor recreation near where people live. The CPRE reports *Green Belts: A Greener Future* (with Natural England in 2010) and *Nature Conservation and Recreational Opportunities in the Green Belt* (with ADAS in 2016) highlighted that:

- **Nature Conservation**: The Green Belts have significant tracts of land of high biodiversity value – *please see figures in bullet point 3 of the previous question.*
- **Agriculture**: 16.2% of all Green Belt land is Grade 1, Grade 2 or the 'best and most versatile' agricultural land. 65.7% is currently in agricultural use. 53% of the total Green Belt agricultural land is subject to Natural England funding 'agri-environment schemes'. This should only increase through environmental land management contracts which reward peri-urban farmers for improving access to the countryside close to where people live.
- **Public Access and Recreation**: All of England's Green Belts have higher public rights of way density than England as a whole. 19% of all traffic free cycle routes and 12% of entire National Cycle Network are in Green Belts. They contain 55,594 ha of open access land, 47% of the area of country parks and 23% of registered (historic) land.
- **Landscape Quality**: 9.1% (147,187 ha) of Green Belts coincides with land designated as an Area of Outstanding Natural Beauty (AONB).

CPRE believes that the Government could do much to improve access to the countryside around urban areas by encouraging greater use of the regional park model used in the Lee Valley to the east and north of London. Since its establishment in 1967 the Lee Valley Regional Park has opened up significant areas of both greenfield and brownfield land for nature conservation and recreation. It has been able to do this because of the stable long-term funding provided by a levy on local authorities within and adjoining Greater London, which in turn has enabled the Regional Park to plan long-term to realise improvements. This model, or elements of it, could be applied much more widely.

Urban | *6. How can the Government increase rates of recycling in the UK?*

To reduce litter and increase rates of recycling in the UK the government should introduce an all-inclusive Deposit Return Scheme that includes all materials, shapes and sizes of single-use drinks containers. An all-inclusive system is necessary to produce the step-change in UK recycling we urgently need to stop waste unnecessarily seeping into our countryside, rivers and oceans. In practice, this means creating a Deposit Return Scheme that offers a simple solution to recycling confusion by fulfilling the following criteria:

- **Comprehensive** | All single-use drinks containers, regardless of material or size, should be included. In addition, the scheme should automatically include any new materials or designs brought to market to prevent producers altering bottle size, shape and material to avoid requirements for them to participate.
- **Mandatory** | The system will need to be mandatory to achieve the large-scale behaviour change that we need to really tackle the problem of litter in our countryside. A voluntary system that drinks manufacturers could decide not to sign up to would be setting the scheme up to fail.
- **Universal** | The same regulations for a deposit return scheme should apply to all four nations of the UK, a bottle purchased in Aberdeen should be able to be returned for the deposit in Penzance.
- **Convenient** | There should be as many return points as possible, from the biggest supermarkets to your local corner shop, so it's as convenient as possible to reclaim your deposit.

Urban | *7. How much of a problem is littering and fly-tipping in the UK and what can the Government do to better address it?*

Throughout September CPRE held 35 litter picks across England as part of its nationwide 'Green Clean'. As well as helping communities clean up their local green spaces, CPRE wanted to highlight the astonishing variety of cans and bottles discarded across our countryside, towns and cities. The data resulting from the Green Clean events will help the Government as it designs England's 'deposit return system', which – if properly set up to collect every drinks can and bottle – will provide a simple solution to recycling confusion and boost recycling rates for drinks container waste to more than 90%. Volunteers taking part in the Green Clean collected a total of 11,212 cans and bottles of all shapes, sizes and materials. Over a third (35%) of those collected were made from plastic, 50% were aluminium, 14% glass and 1% Tetra Pak. While plastic packaging has been making the headlines, this data shows that two-thirds of all drinks containers littered are made from other materials – such as aluminium and glass – and should be taken just as seriously.

Of the plastics: 10% were small bottles (below 500ml), 71% were medium sized (500ml – average water bottle), 10% were large (501ml-1.5l), and 9% were considered extra-large (more than 1.5l). **Of the cans**: 18% were small (below 330ml – small energy drink), 29% were medium sized (330ml – average fizzy drink can), and 53% were large (more than 330ml – average beer can). **Of the glass bottles**: 25% were small (under 330ml – stubby and regular beer bottle), 42% were medium sized (400-750ml – larger beer bottle), and 33% were large (more than 750 ml – wine bottles and large spirits bottles). CPRE's evidence demonstrates that there is no limit to the types and sizes of cans and bottles that are causing harm to our wildlife and natural world. It should provide the incentive for the Government to make the right decision and ensure that all cans and bottles, of all types and sizes, are included in England's deposit return system.