The countryside charity

CPRE South East Newsletter

Spring/Summer 2025

Welcome to the Spring/Summer issue of the CPRE South East Newsletter, a regular digest of news and views on land-use planning and development in the south-eastern counties of England. It is published by CPRE South East as a service to all CPRE branches and local groups in the region, environmental and community campaigners, and elected representatives.

How can we reduce the South East's housebuilding targets?

Government-imposed housing targets for communities across the South East have been increased yet again, following the publication of the latest iteration of the National Planning Policy Framework (NPPF).

The steepest increases are due to the so-called "affordability" factor, effectively punishing the South East for having some of the least affordable house prices. However, the notion that housing in S.E. England will suddenly become more affordable if these new and completely unsustainable housing targets are imposed on the region is, of course, ludicrous.

CPRE must make the case for the removal of the "affordability" element of the Government's "standard method" for calculating housing numbers, so that we have a fairer distribution of new housebuilding.

Under the December 2024 NPPF, the housing targets for the 64 local authorities in the South East Region (Berkshire, Buckinghamshire, Hampshire, Isle of Wight, Kent, Oxfordshire, Surrey, and Sussex – East and West), aggregate to 70,042 new homes per year. But if you remove the affordability factor, and assume that the National target of 370,000 new homes p.a should be spread evenly around the country rather than being disproportionately pushed into the South East, then you get a figure of 50,054 p.a. for our region (71.5% of the current figure). And if you take the overall target figure down to 300,000 house p.a. then the figure falls to 40,591 (58% of the current figure).

The percentages by county are Berkshire – 80.5% and 65.3%; Buckinghamshire – 76.7% and 62.2%; Hampshire – 81.5% and 66.1%; Isle of Wight – 71.2% and 57.7%; Kent – 68.8% and 55.8%; Oxfordshire – 75.9% and 61.5%; Surrey – 63.6% and 51.6%; and Sussex (total) – 63.3% and 51.3%.

Just three authorities – Portsmouth, Slough, and Southampton – would see some increase compared with their December 2024 figures. All other local authorities in the SE would see a reduction, and, in the case of many authorities, targets would fall by more than half under the slower growth scenario. These authorities include: Arun, Brighton & Hove, Chichester, Elmbridge, Epsom & Ewell, Horsham, Medway, Rother, Sevenoaks, Tunbridge Wells, Waverley,

Wealden, Winchester, and Windsor & Maidenhead.

The SE-adjacent counties would also do better from the lowering of the national target and the removal of the "affordability uplift": Bedfordshire – 89.5% and 72.5%; Essex – 71.3% and 57.8%; Hertfordshire – 64.5% and 52.3%. In the Outer London boroughs with Green Belt land, the figures would change to 65.3% and 52.9% of the NPPF December 2024 totals.

It is evident that, even under the 300,000 new homes a year scenario, countryside would be sacrificed in a number of areas in England, but the impact would be far less than would result using the "affordability uplift". CPRE should therefore campaign to remove the affordability component from the housing target methodology so that all parts of the country are treated equally and housebuilding is more fairly and evenly spread.

The Planning & Infrastructure Bill: "a licence to destroy nature"

The Planning & Infrastructure Bill currently before Parliament has come under heavy criticism from environmental charities and NGOs. Research commissioned by the Wildlife Trusts, on behalf of a coalition of charities, has shown that, in stark contrast to Chancellor Rachel Reeves' claim that objections from nature conservationists have been a major factor in slowing down the planning system, in fact preserving the habitat of protected species only features in some 3% of planning decisions. In other words, nature conservation does not block growth.

The Wildlife Trusts and other charities including CPRE have called for a series of amendments intended to limit the Bill's harm and add safeguards for irreplaceable habitats like chalk streams, but the Government has rejected these amendments.

Craig Bennett, Chief Executive of The Wildlife Trusts commented: "Before the General Election, Labour promised to restore nature. Under a year later, the Chancellor is leading an ideological charge against the natural world despite it being the very foundation of the economy, society and people's health. The Government's Planning & Infrastructure Bill, in its current form, fundamentally undermines its commitment to protect nature.

"The so-called Nature Recovery part of the Bill (Part 3) is a Trojan horse – it's a misnomer because, in reality, it is a licence to destroy. It replaces vital nature protections with a weaker substitute, and has been described by the Government's own nature watchdog (the Office for Environmental Protection) as 'environmentally regressive' because it puts irreplaceable habitats and threatened species at risk."

Beccy Speight, Chief Executive of the RSPB, said: "The evidence clearly shows nature isn't a blocker to growth. The government has identified the wrong obstacle to the problem it's trying to overcome, and that has led it to the wrong solutions. With no meaningful amendment in sight, the complete removal of Part 3 of the Bill is the only responsible option left."

The Bill weakens habitat protections and removes the requirement for developers to deliver the nature restoration needed to revive precious landscapes such as chalk streams, wildflower meadows and ancient woodlands and to protect treasured species like hazel dormice, otters and struggling bird and butterfly species.

Among the sensitive habitats directly at risk from the removal of critical protections are the New Forest, Thames Basin heathlands, and chalk streams such as the rivers Pang, Loddon, Kennet, Test, and Itchen.

Devolution and local government reorganisation

The Government's White Paper on English Devolution has major implications for the South East. It sets out plans for "Mayoral Strategic Authorities" (each covering sub-regional areas with populations of 1.5 million or above) which will be responsible for large-scale transport planning, infrastructure and development; and new "Unitary Authorities" (for areas with populations of around 500,000) which will be responsible for local public services in place of existing county councils, districts and boroughs.

Several counties in the South East are in the "fast track" for local government reorganisation – including Hampshire & Isle of Wight, West Sussex and East Sussex – which will mean the end of these County Councils and of districts and boroughs in these counties. Surrey is in the "super-fast track" and had to submit proposals for unitarization at the beginning of May, while the others have until September to put forward their plans.

Surrey was unable to put forward a single plan; the County Council (supported by Elmbridge, Tandridge and Mole Valley councils) have opted to divide the county into two unitary authorities, while eight of the eleven districts (Epsom & Ewell, Guildford, Reigate & Banstead, Runnymede, Spelthorne, Surrey Heath, Waverley, Woking) have made a joint proposal for a three-way division of the county.

Although not on the "fast track", an interim plan for reorganisation has been submitted jointly by Kent County Council and Medway Council.

For all the fast-track counties, there will be elections for "shadow" unitaries in May 2026, with the aim that the county councils, districts and boroughs will all ceased to exist the following April and the shadow authorities will become fully-functioning unitary councils at that point. At the same time, May 2027, elections will be held for regional Mayors.

Berkshire and Oxfordshire are not in the fast track but are said to be "actively exploring their options" in the light of the White Paper. Berkshire already had unitaries but they are borough/district size councils and a long way short of the 500,000 per unitary target, so a combination of these authorities is inevitable in order to comply with the Government's target.

West Berkshire District Council is already in discussion with two Oxfordshire districts – Vale of White Horse and South Oxfordshire – with a view to merging these three districts

into one unitary authority, to be called The Ridgeway Council. CPRE Berkshire says: "This would be an interesting development as it would reunite West Berkshire District with areas that were originally part of the historic County of Berkshire and were transferred to Oxfordshire in 1974, including the iconic White Horse hill at Uffington."

To form a Mayoral Strategic Authority, it has been suggested that the whole of Berkshire (pop. 950,000) and Oxfordshire (750,000) could be combined into a Thames Valley Strategic Authority, with a population of over 1.5m. "CPRE Berkshire will be watching the devolution and local government reorganisation process with great interest."

Green or grey, town our village?

A planning inspector has allowed a 173-home scheme on Green Belt land in Essex after concluding that the local authority, Castle Point, did not meet its 5-year housing supply and, crucially, that the land could be redesignated as "grey belt" because the nearby settlement is a village not a town.

The December 2024 National Planning Policy Framework (NPPF) states that most development in the Green Belt is, by definition, "inappropriate" and should be refused unless it can be considered "grey belt" in which case it can be deemed appropriate if certain conditions are met (e.g. Angela Rayner's much-vaunted "Golden Rules").

"Grey belt" land is defined in NPPF24 as land in the Green Belt that does not "strongly contribute" to three of the five Green Belt statutory purposes, namely: restricting urban sprawl, preventing the merging of towns, and preserving the setting of historic towns. (The other two purposes – preventing encroachment on the countryside and promoting urban regeneration – are no longer considered to carry the same weight as previously.)

This definition of grey belt poses a direct threat to many Green Belt sites and is already leading to worrying decisions by local authorities and the Planning Inspectorate.

In contrast with the Castle Point decision, an appeal by developers against a decision by Mole Valley Council in Surrey has gone the other way, due to the District having a sufficient 5-year housing supply under its recently-approved Local Plan and because, the inspector concluded, the site is essential to prevent two towns merging.

The case concerned an application for 23 new homes on a former garden centre site in the Green Belt between Ashtead and Epsom. The application had been rejected last year by the Council's planning committee and the developers appealed the decision. The inspector ruled that this represented inappropriate development as Ashtead had to be considered a small town rather than a village, and the Green Belt site contributes to preventing the merging of two towns, i.e. Ashtead and Epsom.

In both of these cases, there were two vital considerations: whether or not the local authority has an approved Local Plan with a 5-year housing supply and whether the Green Belt site in question is "strongly performing" (which must include the prevention of towns merging). In Castle

Point the site failed these tests but in Mole Valley it passed. There are important lessons here for CPRE branches seeking to protect Green Belt land from being redesignated as grey belt.

The question of "village or town?" also arose in an appeal concerning a development planned for Green Belt land between Bagshot and Windlesham in the borough of Surrey Heath. The Inspector recommended approval of the development, ruling that as Bagshot should be considered a village, the Green Belt site should be seen as lower-performing as it does not stop *towns* merging, only villages.

There are, of course, other considerations, and even if a Green Belt site is re-designated as "grey" this does not automatically mean that development should be deemed "appropriate". Affordability and sustainability are also factors to be borne in mind. But there is no doubt that being categorised as "grey belt" places a Green Belt site at serious risk.

Judicial Review pending on Thames Water's reservoir plan

A Judicial Review into Thames Water's plans for the South East Strategic Reservoir Option (SESRO) is set for 24-25 June. The company wants to build a huge new reservoir near Abingdon, Oxfordshire, and is determined to push ahead with the scheme despite the Environment Agency warning of "outstanding concerns regarding costs, justification and options appraisal."

CPRE Oxfordshire has been campaigning against the SESRO plan, arguing that Thames Water has used exaggerated data to predict climate change and population growth, and that this huge infrastructure project would do "more to line the pockets of their investors than to fix the issues of clean water supply."

In addition to the environmental damage that CPRE Oxfordshire claims would be caused by the construction of the reservoir, there is a significant amount of supporting infrastructure in Thames Water's plan, including new access roads, a pumping station and tunnels, and schemes to divert rivers and streams.

The Judicial Review process was instigated by CPRE Oxfordshire with campaign group Saferwaters and the Group Against Reservoir Development (GARD).

CPRE Oxfordshire says that Thames Water is "an organisation on its knees." Last year the company lost a quarter of its entire water supply in leakages (570 megalitres) while pumping 72 billion litres of sewage into the River Thames. Meanwhile, water bills for Thames Water's customers are up by 25%.

For more information on the campaign against the SESRO, go to **www.cpreoxfordshire.org.uk**

London Plan consultation prompts CPRE response

London Mayor Sir Sadiq Khan has been accused of u-turning on his previous pledge to protect London's Green Belt. Launching a public consultation on the revised London Plan at the beginning of May, Sir Sadiq went back on his earlier assurances and

announced that "some" Green Belt land will have to be given up for housing.

CPRE London has issued an "Open Letter to London", challenging the "myth" that building more houses will bring down property prices and solve the housing crisis. Co-authors Alice Roberts and Grace Harrison-Porter point out that London's population grew by 6% between 2013 and 2023 while in the same period the number of new homes grew by 11%, yet rents increased by 33% and house prices by nearly 65%. "So, we're building faster than the population is growing, and homes are still getting further out of reach," they say.

They also point out that there are planning permissions for 300,000 new homes in London that haven't yet been built. At the same time over 183,000 people are homeless, and on current performance it would take over 100 years to clear family social housing waiting lists in some areas. "This isn't a housebuilding crisis," say CPRE London. "It's an affordability emergency." For the full text of the Open Letter to London, go to **www.cprelondon.org.uk**

Solar farms continue their march across the countryside

Recent months have seen a plethora of planning applications for ground-mounted solar arrays, mostly on prime agricultural land. CPRE branches across the South East are campaigning against the development of "solar farms", many of which are earmarked for the Green Belt, and either in or immediately adjacent to National Landscape/AONB countryside.

CPRE Surrey has been campaigning against solar farm proposals at a number of locations around the county, including a major scheme by SSE Energy Solutions on farmland owned by the University of Surrey at Blackwell Farm near Guildford. The group's objections were around harm to the Green Belt, the ecological impact of the proposal, especially to ground-nesting birds, and its visual impact on the Surrey Hills National Landscape.

Despite strong objections from CPRE and others, Guildford Council approved the scheme, but it has been held up by a judicial review brought by Compton Parish Council.

Objections were also submitted by CPRE Surrey to applications in Mole Valley for solar farms on Green Belt land at Little Flanchard Farm near Leigh and at Cobham Road, Fetcham; the former was voted through by the District Council's planning committee, but the latter was narrowly rejected by the same committee, citing CPRE's work highlighting the loss of "urban fringe" agricultural land.

"We will continue to oppose unnecessary and inappropriate planning applications for solar farms when local authorities should instead be voting for more rooftop solar schemes," said CPRE Surrey's chairman John Goodridge.

The Local Government Association's Independent Group is leading a national campaign against putting solar arrays on farmland. Group Leader Cllr Marianne Overton wrote in the LGA magazine in February: "Solar belongs on roofs, car parks, down railway lines and motorways... It is easy to label concerned residents as

'nimby', to delegitimise and ride roughshod over them, but we need energy security *and* food security."

Battery Energy Storage Systems – a major new threat to our countryside

Planning applications by electricity companies for Battery Energy Storage System (BESS) development, many of them on Green Belt land, have resulted in strong objections from CPRE branches in Kent, Surrey, and Hertfordshire. BESS facilities are designed to store excess electricity from renewable sources when available and release it when the grid needs it, but there are serious concerns about environmental and landscape impact and, following recent BESS-related fire hazards, about the danger to public safety.

At Aldenham in Hertfordshire – which would have been the largest such facility in the UK – and Sacketts Hill in East Kent, proposed BESS schemes have failed, with the Aldenham application being withdrawn before it was due to be decided by Hertsmere Council's planning committee, and concerns about visual harm as well as biodiversity loss and public safety fears led to Thanet Council turning down the Sacketts Hill application.

A similar application on the borders of Ashtead and Leatherhead in Surrey is yet to come before Mole Valley Council but has been the subject of hundreds of local objections including one from the City of London Corporation which owns and manages the neighbouring Ashtead Common National Nature Reserve. The challenge for CPRE is how to balance the requirement for battery storage facilities to meet the Government's Net Zero targets without harming the countryside. This is going to be a growing problem for CPRE branches in the South East as applications for BESS developments proliferate.

Airport expansion gets the green light from the Government

Chancellor Rachel Reeves and Transport Secretary Heidi Alexander have indicated the Government's support for plans to increase flights from both Heathrow and Gatwick airports. The scheme to build a Third Runway at Heathrow, which the Chancellor has endorsed, would involve the loss of 900 hectares of the Colne Valley Regional Park, and once operational this new runway would generate nine million tonnes more carbon emissions and expose two million people to increased noise pollution from 260,000 additional flights (around 700 per day).

Meanwhile, the Government is also "minded" to back Gatwick Airport's expansion plans, significantly increasing the number of flights by bringing its "emergency runway" into regular use.

Government to scale back pylon plans?

Energy Secretary Ed Miliband is reported to be considering scaling back plans to erect thousands of pylons across the countryside to reach net zero. According to the Daily Telegraph (17/525), Miliband "has ordered

electricity grid planners to examine whether fewer overhead wires would be required throughout the countryside if the power market were broken up."

This follows widespread opposition from local communities and the fact that the threat from pylons was frequently raised by the Reform party during the May local elections. The Government had previously argued that building new pylons in rural areas was necessary to "bring down the cost of electricity" and so that Britain can reach net zero emissions by 2050.

Time to celebrate our trees

A festival celebrating the value, impact and beauty of trees comes to Sussex in June. The Tree Festival will comprise a wide range of activities from tours and talks to poetry and workshops, and will include projects around Sussex's "Living Coast" Biosphere.

Supported by CPRE Sussex, the festival will be launched with a "Branch Out" symposium in Shoreham on 14 June. This will bring together nature lovers, conservation professionals and others from the community. Photographers are also invited to get involved in the Tree Festival through the "I love this tree because ..." photographic competition. Details: **www.cpresussex.org.uk**

More "countryside clutter"

Water companies' plans for a nationwide rollout of smart meters also means that thousands of 40-foot poles could be put up across the country. These so-called "telemetry" poles are apparently needed to handle the data on household and business data usage.

Due to "permitted development" rules, these poles can be put up with little or no consultation with the communities affected. Interviewed in the press about the telemetry poles, architect Ptolemy Dean said they are "an aesthetic disaster" and "a nasty, cheap short-term fix that will damage public spaces and devalue the homes of people living nearby."

New guidance on responding to planning applications

CPRE and the National Association of Local Councils (NALC) have jointly published an excellent new booklet on "How to Respond to Planning Applications". This provides a valuable explanation of how the planning system works and sets out clearly and concisely the steps that need to be taken by anyone responding to a planning application. It also has an extremely useful up-to-date glossary of planning jargon and acronyms. Copies are available by emailing ***planning@cpre.org.uk***

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