

COMMISSION ON CIVIL SOCIETY AND DEMOCRATIC ENGAGEMENT SECOND REPORT

November 2013

The Campaign to Protect Rural England (CPRE) welcomes the opportunity to input into the second report of the Commission on Civil Society and Democratic Engagement. We campaign for a beautiful and living countryside. We work to protect, promote and enhance our towns and countryside to make them better places to live, work and enjoy, and to ensure the countryside is protected for now and future generations.

As a charity with a federal structure the evidence we present here focuses on the experiences of our branches and the potential impact on them of the Transparency of Lobbying Non-Party Campaigning and Trade Unions Administration Bill, rather than the national charity. We feel the voice of smaller groups has been less prominent in the discussion around the Bill to date, whereas as the Bill has potential to disproportionately affect these smaller campaigning organisations.

Understanding how CPRE operates

Although CPRE branches vary in size and interests there is a value in understanding what kind of activity different groups undertake and how this might be impacted by the proposed rules in the Bill.

CPRE has more than 200 local groups, a branch in every county, around 2,000 parish council members and 64,000 members and supporters. CPRE branches work to influence decisions that affect the countryside and rural communities at local and national levels, promoting solutions as well as fighting threats.

Of the 43 CPRE branches 41 are independent charities. 31 have at least one paid part time staff member and 12 are run purely by volunteers. Even those with staff rely on activity undertaken by volunteers. Annual expenditure between groups varies from around five thousand pounds to several hundred thousand pounds.

The following case studies give a flavour of CPRE branch activity

Campaigns

Local CPRE groups proactively seek support for CPRE campaigns such as the current 'Save our Countryside' campaign, which has the following asks;

- Don't sacrifice our countryside - our open spaces are being destroyed unnecessarily. Previously developed brownfield sites should be re-used first.
- A fair say for local communities - the cards are stacked in favour of developers. We want a democratic planning system that gives local people a stronger voice.

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The Campaign to Protect Rural England exists to promote the beauty, tranquillity and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country.

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- More housing - in the right places - the country needs affordable homes. They must be sensitively located, with excellent environmental standards and high quality design.

Planning

CPRE Dorset helped local people reduce a proposed 800 home scheme on farmland outside Sherborne to a less damaging 286 homes. Volunteers addressed a packed meeting in the town and raised the concerns of local people with councillors, planners and the local MP, helping ensure 500 homes were removed from the local plan.

A campaign by **CPRE and Friends of the Lake District** - including 3,000 consultation responses by activists led to the Government announcing a public inquiry to look at extending the Lake District and Yorkshire Dales National Parks. The move would extend the conservation and economic benefits of National Park status to Borrowdale and the Howgill Fells, originally omitted from the boundaries for administrative reasons but equally deserving of protection for their natural beauty.

CPRE Gloucestershire campaigned against four 120 metre wind turbines in the Berkeley Vale helped defend the beauty of the Cotswolds Area of Outstanding Natural Beauty. The Planning Inspector agreed with their evidence to the appeal inquiry, that the damage to tourism and local amenity meant energy benefits didn't balance the impact on the community.

Coalition working

CPRE Wharfedale organised a major housing conference with a coalition of community groups to look at alternatives to building on green fields, calling for 28,500 empty homes and 37,500 plots with planning permission in Leeds and Bradford to be used first.

CPRE Lancashire joined up with local NGOs to challenge the case for the A6 relief road which would damage Green Belt countryside hugely valued by communities along the route.

Election activity

As well as the activity mentioned above, some CPRE branches have undertaken activity, specifically related to the general election.

CPRE Norfolk organised an Election Hustings Event, in which all PCCs for new Broadland constituency were invited to give their views on issues affecting the countryside, specifically with reference to the CPRE Manifesto for the Countryside. The event was attended by PPC for Conservative, Liberal Democrats, Labour, Green and UKIP political parties. The keynote speaker was Neil Sinden, CPRE Director of Policy and Campaigns. The event had a very good turnout of about 80 people and lots of debate and questions.

Cost is difficult to estimate but with hire of hall, refreshments, promotional material etc it is estimated to have been approximately £400. Staff resource was estimated at approximately 12 days in total i.e. about 96 hours which was undertaken by both paid staff and volunteers.

Potential impact of the Bill.

Much of the activity of CPRE branches, although not designed to favour one candidate over another could be inadvertently caught by the rules being proposed. For example a branch setting up a public meeting to debate a new planning proposal may be caught by the rules. If a PPC expressed a view on the proposal the CPRE event could then be deemed to be assisting candidates' election campaigns. This kind of activity along with the other activity set out in Section 1 is the 'bread and butter' of CPRE, so it is likely that most CPRE branches would need to register with the Electoral Commission.

As small local charities CPRE's branches often combine efforts with other local groups to maximise the quality and reach of their work. This would be threatened by the rules proposed as total spending would be applied to each coalition member. As a result productive and effective coalition working is directly threatened by the rules.

CPRE campaigns on issues that have clear geographical scope, for example the proposed site of a train line. Campaigning work on these kind of issues include sending letters and publications to members, holding events and media relations. It is unrealistic for small CPRE branches doing this kind of campaigning to monitor how their activity relates to constituency boundaries, as would be necessary under the proposed rules. These branches are unlikely to have the capacity or capability to undertake this work.

As outlined above there are many different areas where normal CPRE branch activity would be caught by the proposed rules and so many branches would need to register with the Electoral Commission. This will add a significant reporting burden on these small organisations, many of whom might not necessarily have staff capacity or capability to reach these requirements. As a result CPRE branches may be forced to stop activity rather than falling foul of the Electoral Commission requirements or simply have less capacity to do the campaigning activity they exist to do because their limited time and resources are taken up reporting.

This is especially true if staff time had to be accounted for as new reporting systems would have to be created which have cost and time implications themselves. Furthermore if branches had to report even if they had not undertaken any relevant activity (nil reports) this would add an additional burden to no apparent end.

Conclusion

Some CPRE branches are very small and their viability would be tested by the additional burden of Electoral Commission reporting being proposed by the Bill.

Given the concerns and potential impacts outlined above CPRE agrees with the NCVO asks published on 28th November 2013 in their submission to the Commission on Civil Society and Democratic Engagement chaired by Lord Harries.

1. Reduce the 'regulated period' to 6 months.
2. Substantially increase the registration thresholds.
3. Amend the range of activities to remove staff costs.
4. Change the regulation of coalitions.
5. Remove the constituency limits.
6. Amend the range of activities to remove events and public rallies.
7. End the use of nil reports.
8. Amend the definition of controlled expenditure.

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