



# The countryside charity

Kent

## Matter 5 – Site Selection Methodology

### Issue 1 – Site Selection Methodology

*Q2. How were the site areas and dwelling capacities determined? Are the assumptions justified and based on available evidence?*

CPRE Kent is firmly of the view that dwelling capacities should be increased. It is considered the Council has placed insufficient emphasis on increasing density within the towns and larger villages or on insisting on high density development on greenfield sites; or in fully exploring opportunities for development outside the green belt and AONB. The result is that far too much AONB and green belt countryside is being allocated for development.

In our Matter 3 statement we have previously referred to the CPRE report *Beauty Still Betrayed* (April 2021) <https://www.cpre.org.uk/resources/beauty-still-betrayed-the-state-of-our-aonbs-2021/> which highlights the threats to our AONBs as a result of unsuitable housing, particularly in the south east, with the High Weald AONB suffering the highest development of all. Evidence demonstrates that building within AONBs is taking place at low density (averaging 16dph) and doesn't provide the affordable homes that rural communities need.

We also referenced research undertaken by CPRE and Place Alliance (A housing design audit for England, 2020) [https://www.cpre.org.uk/wp-content/uploads/2020/03/Place-Alliance-A-Housing-Design-Audit-for-England\\_2020.pdf](https://www.cpre.org.uk/wp-content/uploads/2020/03/Place-Alliance-A-Housing-Design-Audit-for-England_2020.pdf) which concluded that housing schemes performed more poorly with distance from the urban core and with reduced density. It is clear from the research undertaken that building at low density and on green fields is not being done well in terms of design quality. The most successful schemes (as audited in the study of 142 developments) were those at 56dph – which is almost double the national average of 31dph.

The National Design Code (July 2021) states that density is an essential component of an effective design code. Building at 20-40dph is noted as representing development in outer suburbs; suburban development is pegged at 40-60dph and urban neighbourhoods at 50-120dph. Why then does the council seemingly rely on 30dph?

In addition, it's not always clear how the extent of landscape buffers has been defined, and therefore what determines the amount of developable land there is within a site.

The Kent branch of the Campaign to protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside

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