



The countryside charity

Kent

## Matter 6 – Strategic Sites (policies STR/SS1, STR/SS2, STR/SS3/STR/PW1 and STR/CA1

Issue 1 – Tudeley Village

### Size, Scale and Location of Development

*Q1. What is the site area based on and how was the size of the allocation and number of new homes established?*

CPRE Kent notes that the Plan allocates a site area of 170 hectares and that 2,800 dwellings are proposed to be delivered within a developable area of 95ha, applying an average density of just under 30dph. (CD\_3.67 Strategic Sites Topic Paper, paragraph 5.22-5.23). It is not clear why such a large, primarily, agricultural site of which only 56% is developable has been allocated nor whether the site area was determined by the target number of new homes, or vice versa.

CPRE Kent considers that all development, whether it be on sustainably located brownfield sites, or on green fields should be built at higher than low suburban development densities of 30dph, so that greenfield land take is kept to an absolute minimum. The National Model Design Code <https://www.gov.uk/government/publications/national-model-design-code>, part of the government's planning practice guidance, 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.

The Council does not appear to have considered applying this guidance to the new garden settlement.

*Q2. What alternatives to the size and scale of development proposed in the Plan has the Council considered?*

Having reviewed the information in the SHELAA (CD\_3.77e Capel Site Assessment Sheets) CPRE is concerned that low densities have been applied to two reasonable alternatives at this location. Reasonable Alternative Option 3 notes that at 30dph this larger site area would yield 8,070 new homes but suggests a potential yield of only 5,000 new homes. What density has Reasonable Alternative Option 1, a smaller site area alternative, been calculated at and what density would be required to achieve the scale of development proposed in the allocation?

Additionally, as discussed in the Stage 1 Hearings, alternative sites outside the protected areas of the Green Belt and the AONB do not appear to have been assessed as reasonable alternatives. We also remain to be convinced that the Council has placed sufficient emphasis on increasing density within the towns and larger villages, or on insisting on high density development on allocated greenfield sites across the borough.

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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## Green Belt

*Q5. What would be the extent of the harm to the Green Belt if the boundaries were changed in this location as proposed? Are there any ways in which this harm could be minimised or mitigated?*

CPRE does not believe that the cumulative impact of Green Belt releases in the parish of Capel for the two Strategic Sites has been adequately considered when assessing the harm to the Green Belt. The proposed change to the Green Belt boundaries at the Tudeley Village site allocation STR/SS3 represents the release of approximately 183 hectares of the Green Belt loss and a further 148 hectares are being released at East Capel for the proposed urban extension of Paddock Wood STR/SS1. (CD\_3.128 Submission Local Plan - Table 6 Green Belt Sites). Together these make up over 80% of Green Belt release proposed by the Plan.

The new Tudeley Village settlement would be separated from the large built-up area of Tonbridge by a narrow strip of Green Belt, around a mile wide, with an even smaller green belt separation from the village of Five Oak Green while the Green Belt gap between Five Oak Green and Paddock Wood would be reduced by the East Capel extension.

This is not visible on the Inset Maps covering Capel - Five Oak Green (CD 3.129e(i) Inset Map 7), Tudeley Village (CD 3.129e(ii) Inset Map 8), and Brook Farm CD 3.129e(iii) - but can be clearly seen on the Interactive Map (CD 3.129t Link to Interactive Map). This Interactive Map was not available at the time of the PSLP Consultation in 2020. With such limited Green Belt remaining between Tonbridge and Paddock Wood we question how effective it will be in meeting the purposes of the Green Belt as set out in the NPPF.

The health and wellbeing benefits of this Green Belt land for existing residents of the surrounding towns and villages has been under assessed. Public Rights of Way make this open, agricultural land accessible to residents of the urban areas of Tunbridge Wells, Southborough and Tonbridge and provide links across the Medway floodplains to the north to the Wealdway/Medway Valley walk. The loss of the equestrian centre at Bank Farm will further decrease the opportunities for riding in the borough.

Additionally, further areas of Green Belt, and the High Weald AONB, will be impacted by the proposed highway improvements required by the Strategic Sites developments - although no Green Belt release is proposed in connection with these. The landscape and biodiversity impacts of these new highways and highway improvements do not appear to have taken into account in assessing this allocation – lighting, hedgerow and tree removal, severance of habitats and wildlife corridors etc.

*Q6. Where it has been concluded that it is necessary to release Green Belt land for development, paragraph 142 of the Framework states that Plans should set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. How will this be achieved?*

CPRE Kent is concerned that the Plan does not clearly set out what compensatory improvements to the environmental quality and accessibility of remaining Green Belt are proposed, nor where and how they will be delivered. We feel that there is a high potential for confusion between the specific accessibility and environmental improvements required by Green Belt release and other requirements, such as Green Space and Biodiversity Net Gain, that apply equally to this site and developments on non-Green Belt sites.

CPRE takes the view that work on agreeing improvements should have started at the point where release of Green Belt land at Tudeley was included in the Plan and should have been available for consideration as part of the periods of public consultation for the plan and by the Inspector at the Examination, as part of the test of soundness.

A number of statements in the Plan documentation set conflicting targets for these mandatory compensatory improvements to be defined, as set out below:

Document Reference	Proposed Timing
CD_3.126 Development Strategy Topic Paper	Agreed through the masterplanning process
CD_3.67 Strategic Sites Topic Paper (para 5.18)	Refined with TWBC through development of SPDs + Update as part of the Hearing Statements
CD 3.139 SoCG TWBC and Hadlow Estate	Set out in the planning application

We note that the Tudeley SPD is not due for adoption until July 2023, following public consultation (CD3.143 Local Development Scheme) and the Plan policy confirms the delivery date for planning applications as after the adoption of the SPD. No indication is given as to whether all the compensatory improvements will be defined in the initial planning application, or whether they will be phased as the development is phased.

*Q8. Taking into account the answers provided under Matter 4, do the exceptional circumstances exist at site specific level to justify amending the Green Belt boundary in this location?*

Taking into account our responses provided to Matter 4 and to Matter 2 regarding meeting housing needs, CPRE does not consider that exceptional circumstances exist to justify release of Green Belt land at Tudeley. We additionally do not agree that the site and development specific circumstances set out by the Council in the Development Strategy Topic Paper (CD\_3.126 paragraph 6.186) provide such justification.

1. We recognise that measures on other land owned by Hadlow Estate could potentially **mitigate flood risk** at Five Oak Green but are confused as the Council appear to see these measures as justification for release of Green Belt land well as compensatory improvement to the remaining Green Belt, required by release of Green Belt Land at this location (STR/CA1 policy point 4). We are not clear how mitigation of flood risk can be both a justification and a compensatory improvement – surely this is double counting.
2. We take similar issue with the inclusion of **improvements to landscape and accessibility of countryside beyond the allocation boundary** as a justification for Green Belt release rather than being the compensatory improvement required by the NPPF.
3. With regard to the projected **exemplar design quality**, we note that this forms part of the Plan Policy but suggest that the Council would require this vision for any new garden settlement whether or not in the Green Belt. Indeed, Policy SS/STR1 includes a very similar policy point for the urban extension at Paddock Wood and we assume that applies to all three development parcels, not just the developments on the Green Belt. This is therefore clearly not an exceptional circumstance.

4. We also suggest that support for active travel provision to a nearby larger settlement would be a requirement for a new garden settlement located outside the Green Belt and so, again, is not an exceptional circumstance. We do not agree that the Tudeley Village to Tonbridge active travel route will be a **green route**. It will suburbanise what is currently undeveloped greenfield land, introducing surfacing and lighting when on Hadlow Estate land and, to reach desired destinations within Tonbridge - the primary shopping area, restaurants, leisure facilities and the railway station – it will share the town’s congested roads. Its usage by pedestrians is likely to be severely limited by the distance to these desired locations.
5. We are also surprised that provision of a secondary school site, significant new highway infrastructure (which we assume to be the Five Oak Green bypass) and the localised highway improvements (widening of the B2017 and local junction improvements) are seen as justification for release of Green Belt when in fact they are primarily necessitated by the scale of the proposed settlement at this site.

### Mix of Uses and Infrastructure Requirements

*Q9. Is it clear to users of the Plan what is meant by “the provision of employment space’ and ‘community and leisure facilities? What is expected of applications for planning permission?*

*Q10. Does the Plan support an appropriate mix of uses across the site to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities, as required by paragraph 106 of the Framework?*

We understand that masterplanning work to inform the proposed strategic growth in this location has been undertaken by the Hadlow Estate (Tudeley Village Delivery Strategy 2020). However, that document did not form part of the evidence base for the Plan during any of the public consultations exercises and is not part of the Examination documentation set. We are therefore concerned that that the meaning of these phrases may be unclear to some users of the Plan. For example, we are unsure if the “10,000sqm of commercial and office floorspace (CD 3.128 Submission Local Plan, paragraph 5.222) is the same as the “workspaces integrated in the village, along with offices, workshops, cafes and shops” (paragraph 5.223). Is the provision intended to include live/work accommodation and flexible working hubs to facilitate small start-up enterprises and working from home? Will this information only be available when full planning applications are brought forward?

We additionally question whether the proposed employment space will deliver the highly-paid jobs that will be required to buy houses in this development. With its proximity to Tonbridge railway station and the A21, we consider that there is a high risk that many of the residents will need to commute out of the area for suitable employment and salaries.

*Q11. How will the phasing of development be controlled and is it clear to users of the Plan what new infrastructure will come forward and when? Is it necessary for such information to be contained in the Plan?*

We note the Infrastructure Phasing Assumptions in the Strategic Sites Masterplanning and Infrastructure Study (CD\_3.66a) but cannot see a clear connection with phasing of housing delivery within the site.

The Plan appears to look at the elements of development – housing, infrastructure, facilities, services etc – as entirely separate entities with the view of covering the whole borough for each entity.

The Infrastructure Delivery Plan (CD\_3.142) works on delivery in the short term (under 5 years), medium term (5-10 years) and long term (over 10 years) while the housing trajectory sets delivery year by year.

For a whole new settlement with a planned build-out lasting 15 years or more this approach does not provide a coherent view of what is needed, where it is needed, when it is needed and who is responsible for delivering it, nor does it identify interdependencies. Even the very basic questions of which neighbourhood will be developed first, when will the town centre facilities be developed, what are the assumptions on “critical mass” for development of schools and community facilities are not answered.

CPRE considers that a lack of key facilities including schools, shops and employment space as housing is occupied, combined with a lack of public transport options, will “bake-in” car dependency of those who chose to live in the new settlement.

Improvements to the 205 bus service are planned as medium term delivery only (5-10 years) and do not appear to be funded (CD 3.142 Infrastructure Delivery Plan October 2021 – Appendix 1). CPRE is aware that KCC has recently consulted on withdrawal of subsidies to various other bus routes in the Tunbridge Wells area that are not commercially viable. Additionally, there appears to be no realistic possibility of the truly sustainable transport option, a Tudeley Village railway station, being delivered at all, let alone within the Plan period.

Without public transport providing direct, fast and frequent services 7 days a week to the larger nearby settlements of Paddock Wood and Tonbridge and to more distant destinations in Kent and London, it is difficult to see how the proposed new settlement can become sustainable.

### Viability and Deliverability

*Q20. Is it clear to decision-makers, developers and local communities what infrastructure will be delivered, by whom and when?*

Please see our response to Q11.

*Q21. What is the justification for requiring a Supplementary Planning Document (‘SPD’)?*

CPRE strongly supports the production of SPDs if the new garden settlement at this location is maintained as an allocation. The SPD should enable both current and future residents to not only understand what is proposed but also to monitor delivery and adherence to the plans over the lengthy development timescale.

We do question why only a single SPD (Tudeley Village Structure Plan)<sup>1</sup> is proposed for the Tudeley Village Strategic Site while Framework Masterplan SPD(s) are additionally planned for the strategic

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<sup>1</sup> While not a point for discussion at the Hearings we note that the Plan and the SoCG between TWBC and Hadlow Estate refer to a Framework Masterplan SPD while the Local Development Scheme (CD\_3.143) names it as a Structure Plan SPD. We assume that this anomaly will be corrected before adoption of the Plan.

urban extension at Paddock Wood and East Capel (CD 3.143 Local Development Scheme October 2021). It is worrying that detailed guidance on how the requirements of the Plan policies will be met has not been included for the proposed Tudeley Village SPD.

CPRE would like to see this added, together with consideration of the existing buildings and heritage constraints, as proposed in the SoCG between TWBC and Hadlow Estate. We consider it vital that the Hadlow Estate's Masterplan and Delivery Strategy are included in the SPD to provide a wider public consultation on this than has previously been available.

#### Landscape and Heritage

*Q24. How will the allocation ensure visual and physical separation between Tudeley Village and Five Oak Green?*

CPRE is concerned that the visual and physical separation, which is essential for protection of the narrow strip of remaining Green Belt and the countryside between the two settlements, is not set out in the Plan. It is unclear at what point in the development process this will be defined and how it will be agreed that it is "appropriate".