



The countryside charity

Kent

Matter 3 The Strategy for Tudeley Village

Issue 4 – Meeting Future Housing Needs

Q1. The Council's suggested changes to the Plan include a commitment to an early review. Should the suggested early review of the Plan also include reference to Tudeley Village, either as a future development option or broad locations for growth?

CPRE Kent is firmly of the view that the proposed new garden village at Tudeley should be deleted from the Local Plan for the reasons we have previously set out in our Regulation 19 representations, our Hearing Statements, our direct representations to the Inspector at the relevant hearing sessions; and in accordance with the Inspector's Interim Report.

Those reasons are the loss of Green Belt, lack of evidence around modal shift (active travel and public transport); and the requirement for the Five Oak Green bypass to serve the development and the impact this would have on the High Weald National Landscape/AONB.

As the NPPF is currently drafted, it is clear that the standard methodology is an *advisory* starting point, and that once need has been calculated, it is perfectly acceptable to set a housing requirement target below need, in recognition of the Green Belt status of the land and the potential impacts on the High Weald AONB – paragraph 11 of the NPPF and footnote 7.

It is considered that at the point of the Local Plan Review, the spatial strategy should be developed in accordance with the evidence/policy framework at that time and not be constrained by commitment to the currently unsound allocation at Tudeley. Reference should not be made to Tudeley as a future development option, or broad location for growth.

A consistent theme throughout CPRE Kent's engagement with the Tunbridge Wells Local Plan relates to density. In brief, CPRE's view is that if density is increased (to align with the resultant urban nature of development), then site yields could be increased and development would result in less green field (and Green Belt) land take.

In response to the Council's consultation on its response to the Inspector's Initial Findings we called on TWBC to do a simple calculation based on densities ranging from 60-120dph (for an urban neighbourhood) to see how far this would go towards addressing the shortfall in terms of the 2,100 homes that were planned to come forward (within the Plan period) at Tudeley and the 1,000 homes lost as a means of addressing the flooding (and other issues) at Paddock Wood.

It has long been CPRE Kent's view that with the design flair and imagination of the developers' teams it should be possible to marry the twin objectives of optimising the use of land to be allocated for housing development and ensuring that the sacrifice of green field land is minimised.

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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In response to issues raised at the EIP the Council produced a note for the Inspector (June 2022) with respect to densities (TWLP/083). This references the National Model Design Code and the categorisation of development and the range of densities that can be expected within them.

It should be noted that land at Tudeley is currently green field. But it will NO LONGER be green field once it is developed; it will be a small town or large village and therefore densities should reflect those for urban neighbourhoods. That is, 60-120dph.

As set out in our previous Hearing Statements it is unreasonable to consider that the starting point for densities to be 35dph, which will result in a shameful waste of the Council's precious land use resources.

As stated above, this is not a new issue we're raising. It is one we have flagged up on numerous occasions, as set out in our Matters Statements to the Stage 2 Examination hearings.

Matter 2, Issue 1 (Housing Need): CPRE Kent remains 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 greenfield sites.

Matter 3, Issue 1 (Spatial Strategy): CPRE Kent remains 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 also on greenfield sites.

Matter 3, Issue 2 (Distribution of Development): CPRE Kent is of the view that higher densities should be encouraged within the borough's towns and villages. Higher densities in themselves should not be assumed to adversely impact on settlement character. In fact, research undertaken by CPRE and Place Alliance concludes that higher density schemes are shown to be more successful, including in terms of design quality (see below).

It is noted that the Brownfield and Urban Topic Paper (January 2021) CD 3.83 makes reference to use of an indicative density of 45dph (compared to the 30dph in the SHELAA), which is little more than suburban density levels. If the density of brownfield and urban land is being optimised to what amounts to very low levels of development, the question arises about what happens in the case of green field allocations – and the implications for resultant yields and the provision of affordable housing and support to active travel and public transport.

The Strategic Sites Masterplanning and Infrastructure Study report (February 2021) CD 3.66a refers to the opportunity to provide a higher density of development around the settlement centre at Tudeley, with lower density development at the edges to respect rural character. At paragraph 5.63 it is noted that average density would be between 35-38dph for the urban extension at Paddock Wood. These densities are very low and fall below the expectations set out in the National Design Code.

Further 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-forEngland_2020.pdf concludes that housing schemes performed more poorly with distance from the urban core and with reduced density. The additional constraints imposed by stronger pre-existing urban context, were considered to encourage a more sensitive design response. 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 same comments were also made in respect of Matter 5, Issue 1 (Site Selection).

Since making these original comments Create Street and Sustrans (the walking and cycling charity) have published a major new study called Stepping Off the Road to Nowhere (March 2024) <https://www.createstreets.com/projects/stepping-off-the-road-to-nowhere/>

This study proposes a way to build more homes on less land. It calls for a shift from the current sprawling, road-dependent model of housebuilding to one of 'townbuilding', with new extensions built to existing towns, built at 'gentle densities' that use more terraced and mid-rise buildings to deliver more homes per acre of countryside.

A detailed case study is provided of a site in Chippenham that was to provide new homes in the form of sprawling low-density development. Create Street and Sustrans redesigned the scheme and were able – through 'gentle density' – to accommodate all of the proposed 7,500 homes, using only 40% of the land (a saving of 230ha).

It is considered that this case study perfectly sets out CPRE Kent's case with regard to density, demonstrating that increased development yields can be accommodated on reduced site areas.