



The countryside charity

Kent

Matter 2 – Housing and Employment Needs (Policy STR1)

Issue 1 – Housing Needs and the Housing Requirement

Q2 Are there any exceptional circumstances which justify an alternative approach to using the standard method? If so, what are they, and what should the housing requirement be?

At the heart of the Framework is a presumption in favour of sustainable development (paragraph 10). For Plan-making, paragraph 11b) states that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless

- i) the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
- ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.*

The policies referred to in paragraph 11b) relate to, amongst other things, land designated as Green Belt and Areas of Outstanding Natural Beauty ('AONB's).

Q5. Do policies relating to the Green Belt and/or the High Weald AONB provide a strong reason for restricting the scale of development in Tunbridge Wells?

Q6. Is the housing requirement justified, having particular regard to areas of Green Belt and AONB across Tunbridge Wells?

CPRE Kent considers there are good reasons why the Council should not be seeking to meet its housing requirement in full – reflecting the constraints clearly shown on the key diagram, including the fact that 69% of the borough is designated AONB and 22% is green belt. It is considered that the housing requirement is not justified.

Paragraph 176 of the NPPF requires great weight to be given to conserving and enhancing landscape and scenic beauty in AONBs. Paragraph 137 confirms the great weight be attached to the green belt.

Housing growth should be balanced against the need to protect and continue to conserve and enhance what is important to the local community, including the green belt and AONB.

Given that the High Weald AONB stretches across the whole length of the borough, not only should consideration be given to the impact of the development strategy on the AONB, but also the impact on the significant areas of land which lie within its setting.

In balancing the role the AONB and green belt have on the Council's development strategy, the NPPF at paragraph 3 states "the framework should be read as a whole (including its footnotes and annexes)." If the delivery of housing was the sole objective of the NPPF, then paragraphs 3 and 11(b) would have not been included. For these paragraphs to be meaningful they need to be given due consideration.

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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CPRE Kent is of the view that the scale of development should be moderated. Need should be the starting point – balanced against the constraints of being a borough with significant green belt and AONB coverage, plus other constraints.

The borough does not have the capacity to meet its full housing requirement without significant harm to the green belt and AONB and its setting. And therefore, its requirement should be reduced.

The policies referred to in paragraph 11(b) relate to, amongst other things, land designated as green belt and AONBs. It is on these grounds that CPRE Kent considers there are exceptional circumstances which justify an alternative approach to using the standard method.

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; 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.

Not only is much weight given to the AONB in the NPPF, but its importance is addressed in the Government's response to the Glover Review, which underlines how the last two years have demonstrated the benefit that people get from having access to nature-rich landscapes; and how AONBs have been such a vital resource. The Government notes that "the huge increase in visitors during the Coronavirus pandemic demonstrated the vital role protected landscapes have in supporting the nation's health and wellbeing."

(See <https://www.gov.uk/government/publications/landscapes-review-national-parks-and-aonbs-government-response>)

The CPRE report Beauty Still Betrayed (April 2021) <https://www.cpre.org.uk/resources/beauty-still-betrayed-the-state-of-our-aonbs-2021/> 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.

The Right Homes in the Right Places companion Housing Need Consultation Table (published 14 September 2017) states that 75% of borough is covered by green belt, AONB or SSSI – which in turn are listed in footnote 7 of paragraph 11 of the NPPF together with: Local Green Space, irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding – which provides the caveat for not providing for the full objectively assessed need for housing. The issue of flooding will be relevant also in respect of development proposed at Tudeley and Paddock Wood.

In conclusion, it is considered that the local plan should not seek to meet the full objectively assessed need, as set out in the standard methodology. Policies for the green belt and AONB provide a strong reason for restricting the scale of development in the borough.