



The countryside charity

Kent

Matter 4 – Principle of Green Belt Release

Issue 1 – Principle of Green Belt Release

Q3. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, paragraph 141 of the Framework states that strategic policy-making authorities should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for housing. This will be assessed through the examination and will consider whether the strategy:

- *Makes as much use as possible of suitable brownfield sites and underutilised land;*
- *Optimises the density of development, and*
- *Has been informed by discussions with neighbouring authorities about whether they can accommodate some of the identified need.*

How has the preparation of the Plan sought to make as much use as possible of suitable brownfield sites and optimise the density of development?

As set out in our Regulation 19 representation, CPRE Kent is firmly of the view that green field development should be the last option and that brownfield sites should be developed first. 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 green field land take is kept to an absolute minimum.

In this respect, it is difficult to understand how the Council's stated aims of optimising density (to minimise loss of green fields) has been applied across the proposed allocations. Will schemes be built out at low, medium or high density in the interests of minimising green belt release?

The highest density possible should be used to reflect the nature of local character areas and local housing need requirements.

Paragraph 3.38 of the SHELAA (CD 3.77a) states: "A more refined density calculation has been used at a later stage in plan making to inform site allocation policies. This will take full account of the context of each site and its opportunities and constraints, such as location, surrounding character and environment" – but it's not clear what densities have actually been applied.

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

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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Wood. These densities are very low and fall below the expectations set out in the draft National Design Code.

The CPRE report Space to Breathe [https://www.cpre.org.uk/wp-content/uploads/2019/11/Space to Breathe.pdf](https://www.cpre.org.uk/wp-content/uploads/2019/11/Space_to_Breathe.pdf) (October 2019) demonstrates that where green belt is being developed it's providing executive housing, without affordable homes and is failing to make the best use of land – with densities at just 14dph, which is far below that needed to support sustainable communities.

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-for-England_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 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.

Q4. Can housing needs be met by optimising the use of previously developed land and buildings without requiring land to be released from the Green Belt?

Q5. Not all of Tunbridge Wells is within the Green Belt. Could the need for new housing and employment therefore be met by developing beyond the existing Green Belt boundary? If not, why not?

See response to Matter 3, Issue 1, Questions 8 & 9.

Q6. When drawing up or reviewing Green Belt boundaries, paragraph 142 of the Framework states that the need to promote sustainable patterns of development should be taken into account. How and where has the Council taken this into account?

CPRE Kent is of the view that where reviewing green belt boundaries – particularly in respect of the allocation of land for a new garden settlement – the need to promote sustainable patterns of development has not been taken into account.

The local plan should promote development in locations well served by regular public transport services and social and community facilities, that are in safe walking and cycling distance or would support, or result in, sustainable settlement. Such routes need to feel safe, be well lit, especially for children and women who have to use them after dark - otherwise cars will be the preferred mode of transport.

Without such a commitment to promoting sustainable patterns of development there is a strong risk that developments will remain car dependent, as set out in the 2020 report by Transport for New Homes called Garden Villages and Garden Towns: Visions & Reality: [garden-village-visions.pdf](https://transportfornewhomes.org.uk/garden-village-visions.pdf) (transportfornewhomes.org.uk)

Issue 3 – Exceptional Circumstances

Q1. At a strategic level, do exceptional circumstances exist to alter the Green Belt boundary, having particular regard to paragraphs 140 – 143 of the Framework? If not, how could housing and employment needs be met in other ways?

CPRE Kent is of the opinion that exceptional circumstances do not exist to alter the green belt boundary. Housing need could be met by increasing density of housing development and thereby reduce land take. Paragraph 6.174 onwards in the Development Strategy Topic Paper (CD 3.126) specifically flags up the density issue, in accordance with paragraph 137 of the NPPF, but this does not appear to have been fully addressed by the council.

It is CPRE Kent's view that there is an accumulation of environmental damage – to the green belt and AONB – which needs to be addressed, before new growth can be deemed sustainable. With the principles of sustainable development having been well-established for 30 years, continued environmental degradation during a time of economic growth is a clear national policy failure. As such, housing in response to demand (as defined by the standard methodology), should be re-framed in the context of true need.

To be clear, the principle at stake here is that need is being conflated with demand. That is, we do not consider that the demand for housing can be sustainably met within the borough without further degradation of the environment. And that general housing provision – which doesn't address true affordability – should not be considered an exceptional circumstance, resulting in the loss of green belt.

This issue is fully addressed in our Matter 2 statement.