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Tunbridge Wells Borough Council — LDF - Core Strategy – 3rd stage: “Strategic Housing Land Availability Assessment (SHLAA) Methodology”

(Consultation 25.02.08 – 24.03.08)

Chapter 1 - Introduction - Background

Figure 1 - Stages of the SHLAA

Question 1

Do you agree with the proposed approach, as set out in Figure 1 “Stages of the SHLAA”?

- AGREE

We agree, generally, with the stages proposed. However, we feel that there is need for an option to identify specific areas which CANNOT be developed.

Chapter 4 - Methodology

Stage 1 - Planning the Assessment

Five-year supply of deliverable sites as of 1 April 2008

Question 2

Do you agree with how the Borough Council has arrived at its conclusions in relation to the five-year supply?

- DISAGREE

We feel strongly that any residential institution (class C2) - e.g. retirement homes should also be included in the supply of deliverable sites.

Chapter 4 – Methodology

Stage 2 – Determining which sources of sites will be included in the Assessment

Table 7 - Types of land to be excluded from the Assessment

Question 3

Do you agree that it is appropriate to exclude the types of land set out in Table 7?

Please state if there are any other types of land that you consider should be potentially excluded.

- AGREE

We would want to add to be excluded - apart from the types of land in Table 7 (*Sites of Special Scientific Interest, Areas of Ancient Woodland, Local Nature Reserves, Land within, or forecast to be within, Flood Zone 3b*):

- Historic Parks and Gardens, - Arcadian Areas,
- Common Land, - Village Greens,
- Areas of Important Open Space, - Areas of Landscape Importance, especially in view of para 4.45

“PPG17 Sport, Recreation and Open Space Study 2007 established that there is not a surplus of open space”

Considering para 4.94 *“whilst increasing the density of development will tend to support higher land values, there is a point at which higher densities may become uneconomic if issues of 'cramming' reduce sales values.”*

in the RTW town centre any splitting of family houses into flats should be avoided.

Chapter 4 – Methodology

Stage 2 – Determining which sources of sites will be included in the Assessment

Table 8 - Type of land to be considered as part of the Borough's windfall supply

Question 4

Do you agree that it is appropriate to count the types of land set out in Table 8 as part of the Borough's windfall supply?

Please state if there are any other types of land that you consider should be counted.

- DISAGREE

To avoid uncertainty for communities, developers and planners we think that all types of land should be properly and proactively considered as part of the assessment.

'Empty Homes' are known, so they CANNOT be considered 'windfall' but should be part of a strategic assessment.

The present situation as described in the LDF Core Strategy – Preferred Options para 3.3 and 7.9 CANNOT continue. We oppose the quasi 'happiness' with the present windfall supply for the majority of housing.

Core Strategy – Preferred Options (Dec 2007/Jan 2008)

Main Urban Area

3.3 *Many of the housing allocations identified in the existing Local Plan (2006) have been, or are in the process of being, developed. Windfall sites, which are sites not identified in the Local Plan, have also contributed significantly to housing delivery. However, concerns were raised through the Core Strategy: Issues & Options Report (March 2007) consultation about the cumulative impact of windfall sites on community infrastructure and the character of areas.*

7.9 *Historically (over the period 2001-2007), some 74% of the Borough's new housing has been built at Royal Tunbridge Wells/Southborough. The majority has been on unidentified previously developed land and through maximising potential of allocated brownfield sites. Change of use, or redevelopment, of commercial premises in Royal Tunbridge Wells/Southborough have accounted for the largest proportion of new dwellings compared with other sources. This may imply a loss, or at least displacement, of commercial activity to locations outside the town and possibly the Borough. The impact of this trend on the diversity and strength of the economic base of the town needs to be carefully considered and redressed, particularly in the light of the role of Royal Tunbridge Wells/Southborough as a Regional Hub.*

Chapter 4 – Methodology

Stage 3 – Desktop review of existing information

Table 9 - Sources of information to help identify sites

Question 5

Do you agree with the sources of information that the Borough Council proposes using to help identify sites?

Please state if there are any other sources that you think should be considered.

- AGREE

However, we think that Local Plan Policies, which were not materialised before their expiration, should not form a base for the LDF.

Other sources to identify sites:

- Recreation and Open Space Study (2006) - a further source in its unabridged version could complement "PPG17 – Sports Recreation and Open Space Study 2007". It was regretted that we had been refused at the time to view this document, the Recreation and Open Space Study 2006, which was quoted as Research and Guidance Material to the Community Plan Draft 2006.
- TWBC Housing Strategy
- Conservation Area Appraisals

Chapter 4 – Methodology

Stage 4 – Determining which sites and areas will be surveyed

Table 10 - Desktop Suitability Criteria

Question 6

Do you agree with the desktop suitability criteria (set out in Table 10) to be considered?

Please state if there are other desktop suitability criteria that you think should be considered.

- DISAGREE

We especially refer to criteria:

- *“sites that are equal to, or above, 0.2ha / majority of residential planning permissions are on small sites / strategy – sites that are below 0.2 ha will be considered as windfalls”*
- *“Areas of Important Open Space / Local Plan EN21 / strategy as may need to reconsider sites in terms of their designation, development area/amount of development”*
- *“Areas of Land Landscape Importance / Local Plan EN22 / strategy as may need to reconsider sites in terms of their designation, development area/amount of development”*
- *“Important Landscape Approaches / Local Plan EN23 / development area/amount of development”*

We believe setting a site size threshold of 0.2ha or ANY threshold for that matter is wrong.

All sites should be defined as built or non-built land right at the beginning, to take out speculation with its risks of becoming grot spots and to avoid uncertainties among residents about the future of their community.

The present situation as described in LDF Core Strategy – Preferred Options para 3.3 and 7.9 CANNOT continue. We oppose the quasi ‘happiness’ with the present windfall supply for the majority of housing. (→ Question 4)

We are afraid that reconsidering sites in terms of their designation e.g. Open Spaces will end up one-sided: Pro-Development! We oppose this approach.

Change unreliable time measurements to distance units (metres, kilometres)

e.g. “sites within 30 minutes public transport time of retail areas”

Small industrial sites overlapping with residential areas should be eliminated and used for housing.

Chapter 4 – Methodology

Stage 4 – Determining which sites and areas will be surveyed

Determining sites to be surveyed: a summary

Question 7

Do you agree with the site size threshold (0.2.ha) and the Borough Council’s proposed approach to considering sites on previously developed land within the Limits to Built Development?

- DISAGREE

We strongly disagree with ANY site size threshold. A small site with high density might affect an area far more negatively than a large site with low density.

There should also be a requirement to the minimum size of any dwelling.

The assessment needs to inform on the type of buildings thought to be suitable especially in view of para 4.64 *“As set out elsewhere in this Paper, the SHLAA will not solely consider whether a site is suitable for residential use. In this respect, Tunbridge Wells Borough Council will have regard to other information, such as the initial capacity estimates for the Local Plan employment allocations, in order to inform the likely potential of the site for employment uses.”*

Chapter 4 – Methodology

Stage 4 – Determining which sites and areas will be surveyed

Step 6: Identify greenfield sites within the main urban area, small rural towns and the villages

4.45 The PPG17 Sport, Recreation and Open Space Study 2007 established that there is not a surplus of open space with the Borough's settlements. However, the Study did highlight that the designation of certain sites as 'Important Open Space' and/or as 'Areas of Landscape Importance should be reconsidered. Therefore, Step 6 will consider the sites highlighted by the Study and, potentially, any similar sites where the existing use could be easily relocated

Question 8

Do you agree that it is only appropriate to consider these certain types of greenfield sites within the Limits to Built Development?

Please state if there are other types of greenfield sites that you think should be considered.

- AGREE

It is important for the town centre that all Open Spaces are retained (in view of para **4.45** "PPG17 Sport, Recreation and Open Space Study 2007 established that there is not a surplus of open space") and enhanced through Landscaping and Public Art.

Emphasis should be on Environment and People and NOT on cars.

The trend that every open space can be used as a car park has to be reversed.

Many ugly town centre car parks should become more pleasant and green through landscaping or surface space could be better used by forcing car parks underground.

In our neighbourhood we greatly value the open space and environs of "TRINITY" and we would wish to have our previous submission request of designation of November 2005, re-submitted for the Community Plan June 2006, being considered for any assessment in this area.

http://www.telephonehouse.org.uk/openspace/openspace_trinity_environs_rtw.pdf

Chapter 4 – Methodology

Stage 4 – Determining which sites and areas will be surveyed

Step 7: Identify sites around Royal Tunbridge Wells and Southborough

Question 9

Do you agree with the site size threshold and the Borough Council's proposed approach to considering sites outside the Limits of Built Development?

- DISAGREE

We strongly disagree with ANY site size threshold.

Chapter 4 – Methodology

Stage 5 – Carrying out the survey

Table 11 – Site-specific Suitability Criteria

Question 10

Do you agree with the site-specific suitability criteria (set out in Table 11) to be considered?

Please state if there are any other site-specific suitability criteria that you think should be considered.

- AGREE

Other site-specific criteria (Intrinsic Factor / Contextual Factor - Potential Implications) to be included:

- parking and parking availability;
however it should not be tolerated that front gardens/patios are turned into car parking areas within Conservation Areas (changes to street scene and townscape)
- Odours are a negative factor, not dissimilar to noise.
- Replace 'Utilities' with 'Adequate Infrastructure'.

Chapter 4 – Methodology

Stage 6 – Estimating the development potential of each site

Question 11

Do you agree with the intended approach to estimate the development potential of each site?

- DISAGREE

We would be happier to see references to standards within e.g. Kent Design

As well to be considered is a requirement to a minimum square metres size of any dwelling.

We disagree with para **4.61**

“As stated in the SHLAA Practice Guidance, an estimation of the development potential of each identified site should be guided by existing or emerging Plan policy, particularly the approach to setting housing densities at the local level.”

- It is NOT appropriate to copy density figures from the adjacent area where development is anticipated.

We disagree with para **4.63**

“One constraint, set out in Table 10, relates to the Typical Urban Character Area Analysis (TUCA) that TWBC has undertaken. The TUCA will indicate what density ranges are appropriate within any given Character Area.”

- The density point is important but the Typical Urban Character Area (TUCA) lacks sustainability.

As confirmed in para **4.94**

“Where the issue relates to achievability, it will be necessary to review the assumptions made.

For example, could the site accommodate more development than was originally estimated?

Clearly, this will have been guided by the site's suitability. Furthermore, whilst increasing the density of development will tend to support higher land values, there is a point at which higher densities may become uneconomic if issues of 'cramming' reduce sales values. The issues relating to achievability should be able to be considered relatively quickly.

***4.95** If sufficient sites are suitable, available and achievable, then the need to overcome constraints may not be such a crucial issue.”*

- smaller plots with high density can have, not only an economically negative impact but also a negative factor for building strong communities, as often these sites have only transient occupation.

Chapter 4 – Methodology

Stage 7b – Assessing availability for development

Table 12 – Availability Criteria

Question 12

Do you agree with the availability criteria to be considered?

Please state if there are other availability criteria that you think should be considered.

- AGREE

Other availability criteria:

- Empty Houses, whether or not being difficult to achieve, should be at the top of the availability criteria.

- Compulsory purchases for 'grot spots' would make often key sites available for use.

- Council owned surface car parking could be better utilised for housing and the same amount of car parking space could be provided underground.

Chapter 4 – Methodology

Stage 7c – Assessing achievability for development

Question 13

Do you agree with the Borough Council's proposed approach to assessing achievability for development?

- DISAGREE

We strongly disagree with any site size threshold (0.2ha) and the use of 'windfall allowance'.
(→ Question 4 and 7)

With regard to para **4.83**

" . . . due to the strength of the market. This is likely to continue due to the existing labour market situation and limited spare housing capacity. Therefore, it is reasonable to assume that, for the majority of potential sites within the Borough, viability for residential uses is unlikely to be an issue".

- we would not want the Council to rely on near clairvoyance.

Please delete this, as with the present crisis among Mortgage Banks a prediction to justify achievability for development is not sustainable.

Not only Housebuilders and Estate Agents, but Community involvement and local knowledge should be a priority in para **4.89** *"As part of the consultation on this Paper, the Council will seek the views of those involved in developing sites, including the Home Builders Federation, the development industry and estate/letting agents. Furthermore, the Council intends to seek the advice of a professional surveyor in testing the realism of the factors to be considered."*

Finally with regard to APPENDIX 2 - we should like a copy of the FINAL REPORT, to be issued in August 2008.

Chapter 5 – Further Work

Stage 10 – Determining the housing potential of windfall (where justified)

Question 14

Do you agree with the Borough Council's proposed approach to counting small sites within years 6-10?

- DISAGREE

As windfall sites bring up speculation problems, grot spots and uncertainty for communities, we think that all types of land should be properly and proactively form part of the assessment. (→ Question 4)

We strongly disagree with ANY site size threshold and oppose the notorious use of "windfall allowance".
(→ Question 7)

It is not appropriate to copy density figures from the adjacent area.

Smaller plots with high density can have, as confirmed in para 4.94, not only an economically negative impact but also a negative factor for building strong communities, as often these sites have only transient occupation.(→ Question 11)

We disagree with the 'allowance made on the basis of a thorough understanding of character', in para **5.9** *"As set out in this Paper, the Council will consider sites (and broad areas if necessary) both within and outside the Limits to Built Development in terms of their deliverability. However, in light of the particular local circumstances in the Borough, the Council will seek to include an allowance for small sites (i.e. those under 0.2Ha) within years 6-10, prior to considering the need to release sites outside the limits to built development. This allowance should not be seen as traditional windfalls, which, by definition, are sites that have not been identified. Instead, **the allowance for small sites will be made on the basis of a thorough understanding of character within the limits to built development.**"*

and disagree with the statement 'the TUCA provides a reasonable degree of certainty' in para **5.10** stating *"In this respect, the **Council's Typical Urban Character Area Analysis** provides a **reasonable degree of certainty** about where small sites are likely to come forward and how much residential development they will deliver within years 6-10 and beyond. If small sites are not counted within years 6-10, there is a risk that greenfield sites will potentially be allocated and developed prematurely."*

Previous submissions to LDF - Core Strategy

7 January 2008 - **Tunbridge Wells Borough Council — LDF - Core Strategy**
– **2nd stage:** "PREFERRED OPTIONS REPORT" (Consultation 30.11.07 – 11.01.08)
<http://www.telephonehouse.org.uk/neighbourhoods/ldfcorestrategy-thna07012008.pdf>

27 March 2007 - **Tunbridge Wells Borough Council — LDF -Core Strategy**
– **1st stage:** "ISSUES AND OPTIONS REPORT" (Consultation Feb/March 2007)
http://www.telephonehouse.org.uk/neighbourhoods/ldf_qa-thna270307.pdf