



Local Development Framework – Core Strategy -

## **Strategic Housing Land Availability Assessment (SHLAA) Methodology**

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, the Workshop Session on 6 March 2008 (RTW Camden Centre) underlined the importance of local knowledge of residents (not just House Builders and Estate Agents) in the Stage 3 “Desktop review of existing information”.

Also, the importance of para 1.12 regarding “windfall projection allowances” should be noted and is referred to later (→ Questions 2, 4, 7, 14)

*1.12 Local Planning Authorities should also have regard to the following:*

- *The need to identify specific developable sites for years 6-10 (and, ideally, years 11–15) from the point of adoption of the Plan (PPS3, para 55)*
- *If it is not possible to identify sites for years 11-15, then broad locations for growth may be indicated (PPS3, para 55)*
- *Windfall projection allowances are not intended to be included within the first 10 years of the Plan unless there are justifiable circumstances that prevent specific sites from being identified (PPS3, para 59)*

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 think that the base date should be March 2008, not March 2007 (para 4.11); as the end of March 2008 is so close, it seems unnecessary to work on figures that are a year out of date.

*4.11 It should also be recognised that further planning permissions will have been granted since 1 April 2007 (for example as of 1 April 2008) and that these permissions will count towards the five-year housing supply. However, neither Table 3 nor Table 4 has made an allowance for this.*

– With regard to para 4.12 we think it right that Tables 3 and 4 do NOT include an allowance for windfalls. The subject of windfalls is referred to later (→ Questions 4, 7, 14)

*4.12 Similarly, it is important to note that the original draft South East Plan target of 5,000 dwellings was predicated not only upon outstanding commitments and unused allocations at 2006, but also a projected windfall allowance of 100 dwellings per annum. Again, it must be recognised that neither Table 3 nor Table 4 includes an allowance for windfalls. The case for counting windfalls in years 6-10 is set out in stage 10: Determining the housing potential of windfalls (where justified).*

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 agree that it is right to exclude the types of land from the assessment 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).

Other potential candidates for exclusion from the assessment in Table 7 are:

Historic Parks and Gardens; defined Arcadian Areas; Common Land;

as well, Areas of Important Open Space, Areas of Landscape Importance, subject to revision, as para 4.45 states:

*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*

also, 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

As stated in the RTW Town Forum's response to the Core Strategy Preferred Options Report,

- Chapter 6 – Spatial Strategy Reasoned Justification (e) The Nature of Development Opportunities (p. 17/18 – para 6.24 - 6.26)

- Core Policy 7 – Housing Provision (p. 33 – p.36 and para 7.45 - 7.61)

we are against a laissez-faire approach to windfall sites for the good reasons of uncertainty for communities, developers and planners alike, touched upon in Government advice.

We think that all types of land should be properly and proactively considered as part of the assessment.

*RTW Town Forum – submission 11 January 2008:*

**Chapter 6 – Spatial Strategy Reasoned Justification (e) The Nature of Development Opportunities**  
(p. 17/18 – para 6.24 - 6.26)

*We are concerned at the high incidence of 'garden grabbing' in Royal Tunbridge Wells and the lack of opportunity for affordable housing that results from this 'windfall' approach to planning. Para 6.25 seems to accept that "the historical trend is likely to continue". We feel that the strategy should seek to control that trend to a greater extent, respecting gardens in settled areas and identifying sites where affordable housing is possible .*

*We should like to see these three paragraphs either removed altogether, or considerable revised to provide a more proactive approach.*

**Core Policy 7 Housing Provision** (p. 33 – p.36 and para 7.45 - 7.61)

*We note, too, government advice that "the disadvantage of a windfall allowance is that, because it is not clear exactly where development is likely to occur, there is little certainty for communities or developers". The government advice (DCLG July 2007) goes on to make the point that "generalised windfall estimates make it more difficult to plan, e.g. in terms of making sure the necessary infrastructure is in place."*

*For all these reasons, and those in our comments on para 6.25 (p. 18), we favour a more proactive strategy, rather than a laissez-faire windfall one that waits for something to turn up – quite possibly of the wrong sort and in the wrong place.*

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 that are set to expire soon and be replaced with the LDF should be viewed with extreme caution, together with the June 2001 Urban Capacity Study.

We would like the RTW Town Forum's 'Position Statement on Planning' June 2007 added to the sources and would draw attention to the 'Areas of Opportunity', - a Preliminary Map (page 7).

[www.townforum.org.uk/planning/tf\\_positionstatement\\_planning\\_june2007.pdf](http://www.townforum.org.uk/planning/tf_positionstatement_planning_june2007.pdf)

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.*

- AGREE

Table 10 "Desktop Suitability Criteria" (Suitability Criteria / Justification / Potential Implication for) could be the basis of a useful check list.

However, we should like the first item, deleted:

- *"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"*

together with items which should be excluded (→ Question 3)

- *"Historic Parks and Gardens / Local Plan EN11 / development area/amount of development"*
- *"Arcadian Areas / Local Plan EN24 / development area/amount of development"*
- *"Common Land / Commons Act / strategy"*

Some other items should be reviewed:

- *"Green Belt /  
PPG2; Local Plan Policy MGB1 / strategy as only applies to sites that lie outside the limits to built development"*
- *"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"*
- *"Area of Outstanding Natural Beauty /  
PPS7 / type of development – major development unlikely to be suitable, development area"*
- *"Kent Special Landscape Area /  
Local Plan EN27 / development area/amount of development"*

Infrastructure points of water supply and drainage are especially important criteria.

- *"sites not containing or adversely affecting, groundwater and other watercourses / Local Plan EN16 / development area/amount of development"*
- *"sites having sufficient capacity for sewerage and water supply services / Local Plan EN17 / strategy potentially, if insufficient capacity"*

Replace all time criteria (minutes) with a proper distance (m / km)

e.g. - *"sites within 30 minutes public transport time of Knights Park or retail areas"*

Criteria TUCA is unreliable: (→ Question 11)

- *"Typical Urban Character Area Analysis / Urban Character Area Analysis / amount of development"*

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 and think the “windfall allowance” to be a cop out. The job needs to be done properly, regardless of site size. A small site at a high density could well prove more significant in housing terms than a larger site with a lower density. The assessment needs to focus on the type of housing required, especially affordable and terraced housing. There should also be a requirement for a minimum size of any dwelling in square metres.

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

We agree that it is sensible to review designations such as “Important Open Space” and “Areas of Landscape Importance” as part of the emerging Development Plan Process. We greatly value the open spaces of the town Royal Tunbridge Wells and they should be defended robustly as para 4.45 states *“that there is NOT a surplus of open space”*. However, some designations, such as certain wide verges as ‘important open space’ and garden centres as ‘green belt’ may be questionable.

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 are against the site size threshold of 0.2ha. - We strongly disagree with any size threshold and think the “windfall allowance” to be a cop out. The job needs to be done properly, regardless of site size. A small site at a high density could well prove more significant in housing terms than a larger site with a lower density. (→ Question 7)

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 suitability criteria (Intrinsic Factor/Contextual Factor - Potential Implications) to be included:

- parking problems in the area,
- parking availability,
- public transport.

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 disagree with para 4.61 and 4.63

**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.*

**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) is not always reliable (→ Question 6). It is not appropriate to merely copy density figures from surrounding areas where development is planned.

The Development Potential needs to take account of the type of housing accommodation.

This is not just a numbers game as quoted in para 4.65

**4.65** *... the SHLAA will take a fairly broad approach in terms of estimating the development potential of the site e.g. the site is capable of accommodating 30 dwellings or 1000 sqm of retail; this approach will be later redefined 'stage 7c: assessing achievability for development'*

Royal Tunbridge Wells does not lack certain types of housing. However, RTW is short of affordable housing (→ Housing Needs Survey 2005). The threshold for affordable housing needs to be redefined. As well, a requirement for a minimum size of any dwelling in square metres has to be considered.

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:

Compulsory purchase - with back to back agreements with the Council's Development Partner, could be a factor in the later stages of the plan – provided that a compelling case in the public interest overrides other motives.

## 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

The approach does not appear to take account of the need of affordable housing.

Also, Community involvement should be included in para 4.89 – not just Housebuilders and Estate Agents.

*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.*

With regard to APPENDIX 2 - we should like a copy of the FINAL REPORT, to be issued in August 2008, which should be publicly available.

## 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

(→ Question 4)

As stated in the RTW Town Forum's response to the Core Strategy Preferred Options Report,

- Chapter 6 – Spatial Strategy Reasoned Justification (e) The Nature of Development Opportunities

(p. 17/18 – para 6.24 - 6.26)

- Core Policy 7 – Housing Provision (p. 33 – p.36 and para 7.45 - 7.61)

we are against a laissez-faire approach to windfall sites for the good reasons of uncertainty for communities, developers and planners alike, touched upon in Government advice.

We think that all types of land should be properly and proactively considered as part of the assessment.

(→ Question 7)

We strongly disagree with any site size threshold (0.2ha) and think the “windfall allowance” to be a cop out.

The job needs to be done properly, regardless of site size. A small site at a high density could well prove more significant in housing terms than a larger site with a lower density.

LDF - Core Strategy – 3rd stage:

**“Strategic Housing Land Availability Assessment (SHLAA) Methodology”**

Consultation 25 February - 24 March 2008

Royal Tunbridge Wells Town Forum – Working Group ‘LDF Core Strategy’

22.03.2008 – online submission

## Previous submissions to LDF - Core Strategy

10 January 2008 - **Tunbridge Wells Borough Council – LDF - Core Strategy**

– **2nd stage:** “PREFERRED OPTIONS REPORT” (Consultation 30.11.07 – 11.01.08)

[www.townforum.org.uk/consultation/corestrategy-rtwtfcomments100108.pdf](http://www.townforum.org.uk/consultation/corestrategy-rtwtfcomments100108.pdf)

19 March 2007 - **Tunbridge Wells Borough Council – LDF -Core Strategy**

– **1st stage:** “ISSUES AND OPTIONS REPORT” (Consultation Feb/March 2007)

[www.townforum.org.uk/consultation/ldf-corestrategy-comments190307.pdf](http://www.townforum.org.uk/consultation/ldf-corestrategy-comments190307.pdf)