



## TWBC CORE STRATEGY REVIEW

### Consultation Document on Housing Allocations

#### Response by the Royal Tunbridge Wells Town Forum Housing Working Party

1. The role of the Royal Tunbridge Wells Town Forum is to voice the views of and to seek to protect the interests of the inhabitants of the town area, since they are not represented by a parish council.
2. The Forum strongly supports the Council's proposition that the housing targets imposed on the town of Royal Tunbridge Wells in the now discarded South East Plan are too high and should be adjusted down. It welcomes the Government's measures to abolish minimum density targets and to enable councils to prevent garden grabbing that degrades historic neighbourhoods and robs communities of green breathing space and safe places for children to play. This is particularly important for this heritage town, whose attractiveness to residents and to the tourists on which much of its economy depends is linked with its green and domestic character and its mainly unspoiled townscape. We are not in a position to judge the merits of a technical reclassification of Hawkhurst as a village, an issue given prominence in the consultation questionnaire. But we would be deeply concerned if a changed administrative definition resulted in proposals to transfer its housing obligations to our town.
3. The town is the largest and most important settlement in the Borough and adjacent parts of East Sussex. Enjoying many natural advantages of location, history and environment it also has serious transport and access problems arising from its elongated shape, and it already has heavy pressures on its infrastructure and services. The combination of leafy skylines, domestic scale and harmony of its mixture of buildings in their settings, and its "in-town" greenery including gardens are crucial features of the town. Decisions on housing allocations will have a permanent and irreversible impact for better or worse on this situation.
4. The town cannot sustain further major expansion of housing on top of its present problems, and in the absence of agreed comprehensive strategic plans for its core, its growing centre of retail activity at Longfield Road and its traffic. Its housing allocations should therefore be strictly limited to meet local needs rather than take on those of other settlements in the borough reluctant to accommodate their own growth.
5. In choosing between options, the Council needs to give serious weight to the considerations set out in the following paragraphs which are not clear in its consultation document.
  - A. Council criteria**
  6. A main reason offered for adopting an "urban focus for development" is to protect the distinctive character of the rural environment. No mention is made of the equally important distinctive character of the historic urban environment that makes RTW so desirable and healthy a place to live, bring up children, shop and enjoy leisure time as a local or tourist. This lack of balance will undermine the Council's strategic aims of a prosperous, green and healthy borough.
  - B. Heritage**
  7. This fundamental aspect of the town was inexplicably omitted from the four strategic aims set by the Council as a framework for action. It lies well within the Council's direct responsibilities

and powers and forms a key economic driver as well as environmental priority. It is also an essential part of sustainable development. The opportunity of the present review of housing strategy aims might usefully be taken to put this right now by adding “historic character” as an explicit fifth strategic aim. This would bring a better balance to handling development proposals and expenditure decisions of many kinds in future to the wider benefit of the whole town.

### **C. Infrastructure**

8. The Council are aware of the serious deficiencies in the present situation, particularly roads and parking, water supplies and drainage, and access to primary schools. This cannot be remedied with piecemeal contributions under section 106 developers agreements, but requires programmed major improvements within a budgeted plan agreed with the other providers.

### **D. Administrative boundaries**

9. Administrative systems tied to outdated local government boundaries mean that without the power to influence its neighbours’ policies and resource allocation, the town serves an adjoining swathe of East Sussex by way of roads, parking, employment, shops, schools and other services. The future impact of Wealden/East Sussex housing strategy on this situation is an unknown quantity. What is clear is that any further demands placed on Tunbridge Wells infrastructure and services from that quarter will compete with the needs of the present residents. There is no prospect of significant investment in the near future to meet existing and prospective shortfalls.

### **E. Other administrative distortions**

#### *i. Village versus Town*

10. It would be bizarre if the technical definition of Hawkhurst as a town or village rather than its suitability were to influence decision-taking about whether it should accommodate more housing. Hawkhurst, like elsewhere, should cater for the needs of its own local people of all ages.

#### *ii. Rusthall*

11. The parishing of Rusthall should be irrelevant to decisions on its housing allocations, though it would be helpful to know the demand and supply figures envisaged within its boundaries.

### **F. Data weakness**

12. The basis of the strategy is an estimate of how many more people of what kind will need dwellings over the foreseeable future and how many units should be built to meet that demand or existing unmet demand. The calculations in some cases are obscure and conclusions doubtful.

#### *i. Demand*

13. Great care needs to be taken to avoid skewed or excessive estimates given that:

- 13.1 top down calculations are appropriate at national and regional level, but need far more fine-tuning at borough level. Those given are unconvincing in relation to Royal Tunbridge Wells, not least in attributing all the increased demand to elderly single households many of whom prefer to stay on in their existing family home. The “immigration neutral” assumption seems improbable given the attractiveness to incomers with young families;
- 13.2 base data is in some cases out of date and does not reflect the changing national economic situation, technological development and rising travel costs;
- 13.3 demand can result as much from price and location as from existing population profile;
- 13.4 built up areas have widely differing accessibility to services within them and many parts of Tunbridge Wells town depend as much on car transport as do rural areas.

*ii. Supply*

14. Here more weight needs to be given to the following points:
- 14.1 though this part of the strategic exercise is not site specific, the differing circumstances within the large area covered by Tunbridge Wells town cannot be ignored in decisions about absorptive capacity;
  - 14.2 previously developed land (PDL) and windfall sites are overlapping categories, the latter being part of the former. It is important to know where the Council has identified the main clusters of each, and potential population density there, to assess their relationship to infrastructure, services, general accessibility and urban landscape;
  - 14.3 the acceptability of significant extra housing provision in the folded away large tracts of land associated with the trading estate (the elephant in the room so far as the economic and shopping activity of Tunbridge Wells town is concerned) would differ from “skyline building” of blocks of flats in the main town;
  - 14.4 no indication is given of the split between meeting existing shortfall and extra provision. It is also unclear where assisted/ sheltered accommodation units fit into the calculations;
  - 14.5 while we support the sanctity of Green Belts, we think some of the rural greenfield sites at issue would be more appropriately used than sites within the town’s sensitive and hard pressed landscape areas.

**Conclusion**

15. The Town Forum asks the Council to take full account of all the above points in its consideration of the responses to its consultation document.

26<sup>th</sup> June 2011.