



Strategy and Planning Policy
Planning Services
Tunbridge Wells Borough Council
Town Hall
Royal Tunbridge Wells
Kent TN1 1RS

10th December 2006

Dear Sirs

**Tunbridge Wells Local Development Framework –
Renewable Energy Supplementary Planning Document
And
Sustainability Appraisal for Renewable Energy SPD**

Please find enclosed our response in relation to the above.

We trust that matters raised will be of assistance.

Yours faithfully

Christopher K Thomas
Housing & Environment Committee
Royal Tunbridge Wells Town Forum

Encs

In the main we found the paper to be full of sound ideas with some excellent concepts. We would congratulate the authors of these papers although we do have a few comments, which we trust will be acknowledged.

1.

While we do understand that both of these papers were drafted with the professional in mind it would have been helpful to have a fuller glossary of terms and acronyms to refer to at the beginning of the document. We noted the term “Brise Soleil”, but remain ignorant. One assumes those who undertake “self-build” would also use these documents.

Further confusion arose when reading the Sustainability Appraisal for the Renewable Energy SPD when pages and paragraphs were not numbered.

Whereas these appear minor concerns they are fundamental requirements in any paper drafted, which asks for community involvement.

2.

We are aware the SPD makes it known that care must be taken in relation to listed buildings and renewable energy concepts such as wind turbines and solar panels, however, the type of language used in paragraph 3.6 on page 8 we feel is weak. The words “key consideration for the developer” is simply not strong enough in content.

In particular, you cannot have solar panels and wind turbines on roofs of properties adjacent to buildings that maybe listed as being protected and/or may also architecturally clash. Please be much clearer and stronger in approach.

3.

We are concerned that increased environmental protection standards will increase the initial purchase price, yet the Sustainability Appraisal paper only refers to recouping that increased cost through reduced energy bills. Unfortunately, “first-time” buyers find it hard enough to purchase already. Is it socially acceptable for “first-time” buyers to face even higher costs without any incentives whatsoever at onset?

At the same time, and in order to protect the consumer, we would expect that developers not be able to cut corners with reference to build quality and build design simply to absorb the extra environmental protection costs.

4.

We believe the SPD should stress that developers must always use latest specification for renewable energy products and not use up old stocks of outdated devices. The industry owes a duty of care not to waste resources.

5a.

Although we read and hear the use of Wood Chip Burning Stoves is a good idea, which is again stated in these documents, we remain puzzled as to their real benefit. We understand they are CO₂ neutral, but we foresee added pollution in the air due to smoke, unless the smoke is treated prior to release.

5b.

In the Sustainability Appraisal under “**Economic**” Page 6, section 4.2.2, paragraph 3 we commend diversification in agriculture and forestry. However, Willow is a water hungry species, and in an area such as the South East where climate changes are leading to water shortage, we ask is this a wise step? Could local woodlands supply sufficient to meet the need for fuel without in turn incurring costs for transporting the product and decimation of wildlife areas?

6.

On page 1 of the SPD we wish for section 1.4 to have the last sentence replaced. It should read: The Council’s Air Quality Management **should** achieve and monitor cleaner air by informing the public and publicizing good practice – not the reverse.

7.

Charging V.A.T on conversions of property should be abolished. This would encourage retention of perfectly sound old buildings. This would have a positive effect on the saving of raw materials. This would protect the character of towns and countryside.

8.

No mention is made in either paper about recycling of materials from required demolitions. A whole variety of materials are regularly wasted by Developers who wish to get on with the building as fast as possible. A great many properties, which are being demolished, have seasoned hardwood timber rafters, clay tiles etc. The material should be saved for recycling.

9a.

The Renewable Energy SPD indicates the structure, but implementation of the conditions approved in the planning process, by means of rigorous monitoring by the Compliance Officer, will be vital. Are there adequate officers to ensure full compliance?

9b.

Further, where plans to monitor Objectives 13, 14 and 16 are outlined it is to be hoped that new monitoring methods for the remaining Objectives will be adopted as Renewable Energy gathers momentum. As Objectives are to be set there must be rigorous information collection processes in place to enable informed advice in future decision making and consultation processes.

Further items not mentioned we detail below and ask for additional careful consideration.

- Street Lighting Standards on approach roads to Towns should, where architecturally appropriate, have solar panels facing on shaded South or South West aspects.
- We note that no mention has been made in relation to business premises, especially where houses are being converted to business premises. We ask how this area is being addressed and also what standards business premises are being expected to comply with. Particular reference to wasted power and lighting is a must to eradicate.
- Little mention has been given to how Local Authorities would be required to actively pursue renewable technology with a view to eventual self-sufficiency in the use of electricity.

We wish for it to be known that we have considerable concern if householders refurbishing properties by improving and installing new double-glazing, energy efficient applications etc are affected by future Council Tax levies. All such improvements should be disregarded for such future levies.

Finally, it is stressed that all environmental house improvements should be encouraged and that no disincentives be created through unfair and inappropriate tax regimes.

We ask you to note that we wish to be notified of the adoption of the Renewable Energy Supplementary Planning Document.

Thank you for reading our response.