

Tonbridge & Malling Borough Council

Local Plan

Strategic Land Availability Assessment (SLAA)

Interim Site Assessments

May 2016

Call for Sites Assessments – Frequently Asked Questions

Introduction

The purpose of this note is to explain why the Call for Sites exercise was undertaken, how the sites were assessed and what will happen to the outputs from the assessment.

Why did the Council undertake the Call for Sites exercise?

The exercise is a requirement of central Government planning policy and practice guidance to inform the preparation of a new Local Plan (www.tmbc.gov.uk/localplan) which will need to respond to assessed needs for housing, employment and other uses. More details of Planning Practice Guidance: <http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/what-is-the-purpose-of-the-assessment-of-land-availability/>

What was the purpose of the Call for Sites exercise?

The purpose of the 'Call for Sites' exercise was to provide an opportunity for land owners, developers, parish councils and others to promote sites to be assessed for their suitability and deliverability for development. The exercise took place from the Spring 2014 until 1st September 2015 with information on how to take part and explanatory text made available on the Council's website (www.tmbc.gov.uk/callforsites). Letters of invitation to take part were sent to a wide audience including parish councils, landowners, developers, businesses and some local interest groups.

Please note: This is not an assessment of whether sites will be allocated for future uses in the new Local Plan or developed either in whole or in part. It is a technical exercise that the Local Planning Authority is required to do as part of the Local Plan evidence base.

How were the sites assessed?

The assessment formed a technical appraisal of all sites and broad locations capable of delivering five or more dwellings or economic development on sites of 0.25ha (or 500m² of floor space) and above. The sites were assessed against the requirements of the Government's **National Planning Policy Framework (NPPF)** (<http://planningguidance.communities.gov.uk/blog/policy/>) and the **Planning Practice Guidance** (<http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/>) This involved an assessment of the following:

- **Suitability** – This involved an assessment of the sites against policies in the NPPF, including an assessment of the sustainability credentials of each site, i.e. proximity to existing centres, services, community facilities and transport nodes/hubs. It also involved an assessment of specific site characteristics including:
 - physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;

- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
- appropriateness and likely market attractiveness for the type of development proposed;
- **Availability** – This involved an assessment of whether or not the site is available for development. A site is considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners.
- **Achievability** – This involved an as assessment of whether or not there is a reasonable prospect of development taking place on the site. This was a judgement about the economic viability of the site, i.e. an assessment of whether there are any abnormal costs (eg infrastructure, remedial work) that would put at serious risk the delivering of development within the time frame of the new Local Plan (up to 2031).

The outcome of this assessment is a conclusion on the **suitability and deliverability** of each site. **Please note: Suitability does not necessarily imply the whole site is suitable.** Deliverability was determined by the outputs of the availability and achievability assessments. The timeframe within which deliverability was assessed is the timeframe for the new Local Plan, i.e. 2031, which might mean that only part of a site might be deliverable within the plan period. For the assessment outcome, each site falls within one of the following categories:

Suitable and deliverable
Suitable but undeliverable
Unsuitable

What are 'high-level constraints' and how did these affect the assessment?

The assessment took account of those issues which are beyond the control of the Borough Council but which preclude development, taking a lead from the **NPPF** (<http://planningguidance.communities.gov.uk/blog/policy/>). The high-level constraints that were factored into the assessments were (in no particular order):

- Special Areas of Conservation (SAC)
- Sites of Special Scientific Interest (SSSI)
- Flood Zone 3 (for more vulnerable uses, eg residential)
- Ancient Monuments
- Ancient Woodlands
- Areas, parks and woodlands covered by Tree Preservation Orders

Those sites wholly covered by one or more of these high-level constraints were assessed as unsuitable. Parts of sites covered by high-level constraints were excluded from the developable area and the calculation of the potential yield (see below). The assessment

took account of other high-level policies including Areas of Outstanding Natural Beauty (AONB), Conservation Areas and Listed Buildings. However, according to the **NPPF** (<http://planningguidance.communities.gov.uk/blog/policy/>) and the Government's **Planning Practice Guidance** (<http://planningguidance.communities.gov.uk/blog/guidance/>), these do not preclude any development potential but instead affect the amount that could take place, i.e. minor as opposed to major. This was reflected in the assessment.

Did the assessment take account of local planning policies?

The assessment is part of the evidence base for the Local Plan; it is not part of plan-making itself (that is the next stage in the process). The assessment is a technical exercise, primarily to clarify practical aspects of the sites, rather than to judge whether or not they should feature as future allocations for development in the Local Plan. For these reasons the assessment was effectively 'local planning policies-off'. So, for example it did not consider policies that are made during the preparation of the Local Plan, such as the Green Belt or other local policy considerations. These are matters that are addressed at the next stage which is when the Local Plan takes shape, responding to the evidence base.

What does 'potential yield' mean?

Potential yield is an initial assessment of what each suitable and deliverable site could accommodate in terms of different types of development, eg residential, employment.

For those sites assessed as suitable and deliverable for residential uses the calculation is quite simple:

developable area (site area (hectares) excluding high-level constraints) x 30
(average dwellings per hectare).

For non-residential purposes, the potential yield is simply the developable area (site area (hectares) excluding high-level constraints).

The outcome of this calculation is by no means a final figure of what is acceptable in planning terms; if and when the sites are progressed through to the plan-making stage a more detailed assessment will be required. At that stage planning judgements about how much of a site is appropriate for development will need to be made which might well reduce the area and yield significantly. Again, at that stage it will be necessary to understand fully the land-take for supporting uses including schools, healthcare facilities, open space and roads. Potential yield at this stage is therefore very much a starting point for this exercise.

Where sites have been assessed as suitable and deliverable for more than one use, eg residential and employment, the potential yield figures that are stated in the assessment are mutually exclusive, i.e. they represent what could be achieved for that single use across the site with no other uses. Multiple uses on a site would impact upon the potential yield for each use.

Please note: These yields are a simple, overall estimation at an indicative density of 30 dwellings per hectare. In the event of a site being allocated in the Local Plan the actual developable area and density of development will have to take local policy considerations, character and the need for necessary supporting infrastructure into account and as a result yields may be lower.

What will happen to the outputs from the assessments?

After fact checking with the submitters of the sites, the assessments will provide important evidence for the preparation of the new Local Plan (www.tmbc.gov.uk/localplan). The evidence will feed into the assessment of potential development strategies for the new Local Plan.

If a site is assessed as 'suitable and deliverable' does this mean it will be automatically allocated for development in the Local Plan?

No. The call for sites and the technical assessment of sites put forward is an important evidence source to inform plan-making but does not in itself determine whether a site should be allocated for development. Allocation of land for development will depend upon the extent of policy and practical constraints identified in the assessment and the choices ultimately made by the Borough Council following public consultation on the strategy options available. The technical assessment provides information on the range of sites which are available to meet need, but it is for the Local Plan itself to determine which of those sites are the most suitable to meet those needs.

When can I comment on the sites?

The initial assessment is purely a technical exercise in accordance with Government policy and planning practice (see above), which means the first opportunity to comment will be during the initial consultation on the Issues & Options for the new Local Plan in the **Autumn 2016**.

Over the next few months Borough Council Members will be considering some potential options for the future development strategy and approach to site allocation. Following that will be an opportunity to comment during the initial consultation on the **Issues & Options** for the new Local Plan. This consultation is timetabled to commence in the **Autumn 2016** (more details: www.tmbc.gov.uk/localplan). It is at this stage that people will be able to make a formal representation on what is to be contained in the emerging Plan.

The consultation will identify potential borough-wide strategies for addressing identified local needs and will feature, for consideration, those sites that are assessed as potentially suitable and deliverable for housing and economic uses during the period up to 2031. Following the initial consultation there will be some challenging choices to be made before the preferred strategy and site allocations are identified and are subject to further consultation and ultimately scrutinised at a local public examination.

How do I keep in touch with the progress of the Local Plan?

Details of the Local Plan preparation process: www.tmbc.gov.uk/localplan.

If you are unable to find the answers to your questions on these pages, please do not hesitate to contact the Local Plan team: localplan@tmbc.gov.uk

