



10 January 2008 – SUBMISSION to:

**Tunbridge Wells Borough Council - Core Strategy** – “PREFERRED OPTION REPORT”  
(Consultation 30.11.07 – 11.01.08)

Chapter 1 - Introduction

**What is the Core Strategy?** (p. 3 – para 1.9)

1.9 The Core Strategy: Issues & Options Report explained the structure of the LDF system and so this is not repeated here. It is, however, very important to clarify that the Core Strategy, whilst central to the LDF, will not by itself replace the Local Plan. Nor will it consider so many issues in such depth. It will not, for example, allocate specific sites for development. Nor will it contain detailed policies for development control purposes. These matters will be covered by a Site Allocations Development Plan Document (DPD) and a Development Control Policies DPD respectively, as shown on the Borough Council's Local Development Scheme (LDS). The role of the Core Strategy is simply to establish the guiding principles and policy framework for these more detailed DPDs.

We fear that the preamble to the box tends to confuse, rather than clarify the situation. Accordingly, we feel that the preamble would be better omitted, leaving the words in the box to speak for themselves on the matter of how much development will take place and where it will be located. Anticipating documents yet to be provided can give rise to uncertainties and anxieties. ( → also comment concerning para 6.26)

Chapter 2 – Spatial Portrait

**Demographics** (p. 6 – para 2.4 - 2.8)

Overseas Arrivals

Although the document is prefaced with offers to translate it into Hindi, Urdu, French, Polish, Mandarin, Tagalog and Bengali, the spatial portrait does not appear to recognize recent demographic changes and their implications, but simply extrapolates past trends. Regard should be taken to the threats and opportunities offered by the influx of people now arriving from overseas into the Borough, and in particular:

- Its effects upon the availability, affordability and over-crowding of private rented sector housing. As more of these arrivals begin to qualify for assisted housing and presumably in due course houses to buy, pressures and problems will grow more than forecast in these sectors also.
- Their transport choices and needs and their impact upon the transport system.
- The possibility that this surge of immigrants will cluster in the less prosperous parts of the borough and the impacts this may have.
- The rising demand for school places for non-English speakers.
- The increasing reliance of the local economy on low-waged immigrant labour for most of its agriculture, catering staff, factory work, shop assistants, hospital and care home ancillary jobs and domestic cleaning.
- The need to integrate new arrivals.

#### Absence of Gender Analysis

Also, the document does not indicate how its strategy will relate to its statutory duty in respect of equal opportunities concerning gender. Because of family responsibilities and lower incomes, many women have different problems from men with regard to location and types of employment, access to local facilities and transport. These are matters that would seem to merit more careful analysis and commitment.

#### Failure to assess demand and supply across the County boundary

A further important demographic consideration should be the relationship of the town and the borough with its hinterland across the county boundary and the major effect this has. Demographic and economic calculations could be rendered almost meaningless if they do not take account of the impact on Royal Tunbridge Wells of housebuilding and traffic generated on the Wealden district side of the nearby administrative border.

### Chapter 3 – Context for Development to 2026

#### **Main Urban Area** (p. 8 – para 3.5)

We do not agree that there is *“no further need for convenience (foodstores) floorspace”* in Royal Tunbridge Wells town centre. ( → also comment under Core Policy 8)

### Chapter 4 – Spatial Vision

#### **The Spatial Vision** (p. 10 – para 4.2 - 4.6)

The document pays scant attention to the existence of the now huge North Farm Industrial Estate. This was originally intended to provide a balanced mixed development with improved transport links. In the event, it has been allowed to grow in a piecemeal fashion and has drained away a good deal of the economic activity of the town centre. We consider that the North Farm area of the town needs to be built into the Core Strategy in a positive way, complementary to the aims for the established town centre.

4.5 *“Regeneration efforts will be targeted on the least affluent parts of the town”* → also comment under Core Policy 1

### Chapter 5 – Strategic Objectives

#### **Strategic Objectives** (p. 12 – para 5.1 – bullet point 1)

We should like the words *“whilst protecting and seeking to enhance the Borough’s unique high-quality built and natural environment”* printed in bold type. It is important that development and infrastructure are not at the expense of this unique, but sometimes fragile environment.

### 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 considerably revised to provide a more proactive approach.

## **Chapter 7 Core Policies**

### **Core Policy 1** (p. 22 – bullet point 1)

#### **Development in Royal Tunbridge Wells and Southborough**

The town centre of Royal Tunbridge Wells is the main generator of income in the Borough and needs to become the showcase for the “Tunbridge Wells brand”. It is important that “comprehensive redevelopment” (we should prefer “development” without the “re”) of town centre sites does not happen in the tabula rasa manner that was all too common in the 1960s. The town needs to grow organically, with due regard to Conservation Area considerations and with a proper balance between residential and commercial uses.

### **Core Policy 1** (p. 22 – bullet point 3)

#### **Development in Royal Tunbridge Wells and Southborough**

We think the rationale for the particular emphasis on health sector business to be somewhat flimsy, and would rather build upon the town’s established arts/culture/heritage tourism image, with associated services and shopping, as its key and unique marketing attraction. The establishment of a regional conference centre that could attract national and international interest could fulfill a long-standing aspiration of the town. Health sector business could be a desirable add-on in this former spa town, but not the sole or necessarily main focus.

### **Core Policy 1** (p. 22 – bullet point 4)

#### **Development in Royal Tunbridge Wells and Southborough**

We feel very serious concern about the approach of providing 23,403 sq m of new non-food retail floor-space and about extending Royal Victoria Place. The 2006 Retail Study (relied upon in paragraph 6.2, page 13) is based upon *estimates* of available expenditure, existing turnover, growth in expenditure, growth in turnover, and other factors (Fig 7.1, page 75 of Study). These may, or may not turn out to be right, depending upon the economic situation in years to come, the impact of the internet and a host of other uncertain elements. Yet the figure of 23,403 is worryingly precise for what is, at best, an inexact science. The figure is also very large, and roughly equivalent to another RVP. Moreover, the methodology appears not to take account of such practical considerations as traffic congestion and car parking. We believe that large expansion of RVP would be likely to upset further, the balance between the northern and southern ends of the town’s shopping centre. We favour only a very modest extension for Royal Victoria Place. We think this to be a most serious point of concern and it is one which we feel merits much wide discussion among councillors, townsfolk and traders.

In any event, before contemplating any more retail floorspace in Royal Tunbridge Wells, infrastructure, transport, parking strategies and the general appearance of the town centre need to be thoroughly investigated. The aim should be for the town to be sufficiently attractive to “spend a day, or a stay in Royal Tunbridge Wells”.

### **Core Policy 1** (p. 22 – bullet point 6)

#### **Development in Royal Tunbridge Wells and Southborough**

We support the strengthening of neighbourhood centres, but should like these to be identified, and an indication given about how such strengthening would be achieved. We note in paragraph 4.5 (page 10) that regeneration efforts will be targeted on the least affluent parts of the town. We wonder whether or not this might mean Sherwood, for example, rather than the Civic Centre area.

### **Core Policy 1** (p. 22 – bullet point 7)

#### **Development in Royal Tunbridge Wells and Southborough**

We strongly support the approach of “*preserving the relationship between the landscape and townscape of Royal Tunbridge Wells to secure its special character in the long term*”. In this connection we feel anxieties about the trend for whole front gardens in the Conservation Area to be turned into hard standing for the parking of cars. We appreciate that Victorian streets without garaging can pose a practical problem, but the ill effects of forecourt parking can be mitigated to an extent by the planting of trees and shrubs, the provision for suitable fencing and more sympathetic surfacing than a concrete apron.

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

**Housing Provision**

We favour a lower threshold and a higher percentage of affordable housing in the urban area, which might well be the same as that envisaged in rural areas. We support the figure of 40% put forward ('affordable housing - item b). Also, we should like clarification of Parking Policy in urban areas .

With regard to housing provision, we note that the Strategic Housing Land Availability Assessments (required by PPS3: Housing) differ significantly from the old-style Urban Capacity Studies. We have misgivings about the June 2001 Tunbridge Wells Borough Urban Capacity Study from a number of points of view. These include undesirable references to class, questionable boundaries to areas, and insufficient regard to Conservation Area considerations. If, therefore, that study is to play any part in the new assessments, we consider that it should be thoroughly revisited, with proper public consultation.

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.

**Core Policy 8** (p. 38 – bullet point 4)

**Provision for Retail and Leisure**

We are appalled at the words *"Not allow any further additional convenience (food) uses, other than in Southborough"* and we ask for this approach to be changed forthwith. The town of Royal Tunbridge Wells is quite well provided with non-food shops, but is very badly provided with food shops, especially since the former Safeway store was closed by Morrisons. The only town centre supermarket now is an inadequate Tesco, which is, admitted in the Retail Study to be trading at no less than 396% of company average. This often results in congested aisles and unsatisfactory shopping conditions. A town centre Waitrose would be welcomed by many, as would a fishmonger. Currently, there is no fishmonger's shop in the town and only one greengrocer and one butcher. We would support a quality supermarket on the Morrisons site and a general improvement to the appearance of that side of the station. – We believe there to be a serious need for better and more accessible food shopping in Royal Tunbridge Wells Town Centre.

**Core Policy 8** (p. 38 – bullet point 6)

**Provision for Retail and Leisure**

Remove the words *"where appropriate"*. This is an unnecessary and undesirable subjective caveat to an otherwise commendable approach.

**Core Policy 8** (p. 39 – para 7.75)

**Provision for Retail and Leisure**

The claim that the Borough is *"well provided for"* in terms of all types of sports facilities seems unduly complacent. So far as Royal Tunbridge Wells is concerned the type of facility for children and youth is perceived as far from adequate, with relatively few places for young people to go. Additional recreational facilities, such as an ice rink, could be of benefit from that point of view, as well as being appropriate to a Regional Hub.

**Core Policy 9** (p. 40 – bullet point 3)

**Employment Provision**

We share the concern that the economic base of Royal Tunbridge Wells town centre is becoming increasingly dominated by retail uses and that there is a trend of out-commuting of the Borough's highly skilled workforce. Thus we support, in principle, the approach of safeguarding existing employment sites that are well located and other wise well suited to employment use. However, such an approach needs to be intelligently applied. These are properties in the town centre that were built as house, where conversion to office use has not been suitable in terms of floor loadings, means of escape, car parking and in other ways. Reversion to their original residential use should thus be encouraged in such cases. On the other hand, purpose-built offices, such as Garden House in Calverley Street and Lizanne House in Mount Sion should not have been lost to the town as places of employment. The reasoned justification needs to be expanded to ensure sensible interpretation of Core Policy 9.

**Core Policy 10** (p. 41 – item 1)

**Transport Infrastructure**

We think it important to work with partners to improve bus operations in the town, replacing old-type polluting buses with smaller eco-friendly vehicles suited to town centre routes. The success of the 281 town centre bus link should be built upon and further improvements made, especially at The Pantiles.

The proposed reinstatement of the rail link from Tunbridge Wells West to Eridge should be supported.

**Core Policy 10** (p. 41 – item 2)

**Transport Infrastructure**

With regard to the encouragement of walking, we strongly favour making the town centre spine, in Royal Tunbridge Wells, from Grosvenor Road to The Pantiles, much more pedestrian friendly, and visually attractive. The Bus Gate enforcement remains unsolved; the crossings at Nevill Street and at Vale Road are currently particularly bad spots for pedestrians. We consider that the balance between cars and pedestrians in Royal Tunbridge Wells town centre is currently too heavily weighted against pedestrians, and that this should be reversed.

**Core Policy 10** (p. 41 – item 2 – bullet point 1)

**Transport Infrastructure**

We strongly support the promotion and planning of a park and ride facility to serve Royal Tunbridge Wells, coupled with efficient and reliable public transport links.

**Core Policy 10** (p. 41 – item 4)

**Transport Infrastructure**

We believe there to be an urgent need for a town centre car parking policy. Para 7.88 makes some short general points but much more serious work needs to be done on the whole parking question. Some of the town centre surface car parks are probably capable of more imaginative treatment, such as the Beech Street car park, where use of the levels might permit the introduction of housing, with parking beneath.

**Core Policy 11** (pp. 43/44 – bullet point 2 and para 7.92)

**Green Belt and Rural Fringe**

While we strongly support the concept of the Green Belt, and the general presumption against inappropriate development, we agree that it is sensible to review the boundary around Royal Tunbridge Wells.

**Core Policy 12** (p. 46 – bullet point 2)

### **Re-use of Previously Developed Land and Buildings**

Comments on “windfall sites”, → also Chapter 6 - para 6.24-6.27 and Chapter 7 - Core Policy 7.

We feel that too much reliance upon arbitrary windfall sites to be the anti-thesis of proper strategic planning.

**Core Policy 13** (p. 48 – bullet point 2)

### **Natural Environment**

Omit the words “*where possible*”. These are an unnecessary and undesirable caveat, where the approach is in any case only to “consider” and “seek”.

**Core Policy 14** (p. 51 – bullet point 1)

### **Historic Built Environment**

We strongly support “*preserve or enhance the special character and appearance of conservation areas and listed buildings and their settings*” and would draw attention to the need of a ‘local list’ ( “Local Designation” provides a means for Local Communities to identify and protect the building, sites and spaces that matter to them’ - Heritage White Paper 2007), which should inform the town’s ‘Master Plan’.

**Sustainability Appraisal - Appendix E, Objective 11 (To Protect, Enhance and Make Accessible for Enjoyment, the Borough’s Countryside and Historic Environment):** We are concerned about the question marks about the effects of Core Policies 7, 8 and 9. In our view, it should be a function of good planning to ensure that the impact of other policies on Core Policy 14 is no less than neutral.

**Core Policy 14** (p. 51 – bullet point 2)

### **Historic Built Environment**

Remove the wording “*where possible*” which tends to suggest a half-hearted approach. Clearly, if something is not possible then it cannot happen in any event.

**Core Policy 15** (p. 52 – para 7.123)

### **Climate Change**

We should be interested to know the means by which the quantity of ground water is to be enhanced.

**Core Policy 16** (p. 55 – p. 58)

### **Design Quality**

We welcome this section, although we feel that the Core Policy itself could do with strengthening. The whole ensemble of Royal Tunbridge Wells with its valley and surrounding hills, its skylines, its vistas, its open spaces, and its domestic scale, has a character that is particularly special and beguiling. Thus there should be a policy limiting the height of any new commercial or residential building that would disrupt this special character. No less important are the existing green oases and trees that should be retained. The Conservation Area should be extended more comprehensively and ambitiously than at present, to include more of the town’s Victorian and Edwardian heritage before this is ruined and much of the charm of the town lost.

**Core Policy 16** (p. 55 – bullet point 3)

### **Design Quality**

We agree about the importance of quality in the public realm in creating attractive and functioning places. Sadly, much of the modern street furniture in Royal Tunbridge Wells is of poor quality and detracts from its character. There is much to be done in this direction and the policy needs not only to recognise the importance of quality but to seek to secure this in various ways.

**Chapter 8** (p. 59 – p. 61)

### **Implementation and Monitoring**

We look forward to the delivery of these policies, subject of course to the comments and representations made in the foregoing.

10.01.2008

RTW Town Forum

Working Group 'Core Strategy'

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