

# Royal Tunbridge Wells Civic Society

## *Comments on Proposed Revisions to PPS6 - Planning for Town Centres*

1. The need for this revision to the Guidance after only three years is not understood. Figure 1 on p.51 shows a modest reversal of the previously catastrophic trend for retail development outside centres, but this does not seem to justify any lessening of the presumption against it.
2. The analysis of the present situation in Annex A (puzzlingly entitled `Success of the Existing Policy`) is valuable, but it is unclear how the proposed revisions relate to the erosion of choice in town centres in recent years, or indicate ways in which local authorities can combat this. On the contrary many of the alterations to Chapter 2 seem merely to require them to attach greater weight in the development control process to competition, improving economic performance and raising productivity.
3. This implies a bias in favour of major new development, wherever located, thereby promoting larger units and larger operators at the expense of smaller and/or independent retailers. There is a relative lack of reference to other measures such as management, refurbishment, changes of use etc. to sustain town centres without major building.
4. The cost dimension for retailers is hardly recognised. Short leases and higher rents can be decisive for smaller operators, and the effect of development or redevelopment is usually much higher costs and forced moves.
5. The effect is increased where new development reduces footfall in an older area, or an off-centre location obliges shoppers to use cars. We believe requiring off-centre locations to have other transport access is largely ineffective in practice.
6. We welcome the reference to qualitative considerations as well as quantitative in assessing need in deprived areas, but note this is in the context of `identifying sites for appropriate development` (replacement para 2.33). We are also concerned by references to local authorities managing land supply (eg. replacement para 2.2).
7. We welcome the approach taken in Chapter 3 to requiring developers to prove to local authorities their need for a particular location and/or format for new development, but believe this could be strengthened by enabling the local authority to contribute to evolving a major project at the outset. We do not believe local plans alone are generally sufficient guidance for this.
8. We find the wording of the Introduction as to the replacement of the needs test and its integration with the impact test confusing and its effect as described in Chapter 3 unclear, but as stated above would deplore any lowering of the threshold for unplanned major developments or relative advantage for off-centre locations.

**ART**

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