



**Proposed Changes to Planning Policy Statement 6 (PPS6):
Planning for Town Centres**

Consultation 10 July 2008 – 3 October 2008

This consultation on revisions to Planning Policy Statement 6 (PPS6) follows the commitment in the Planning White Paper 'Planning for a Sustainable Future' (Summer 2007) to review the current approach in PPS6 to assessing the impact of proposals outside town centres. The proposals strengthen the Government's 'town centres first' policy and emphasise the importance of maintaining a strong focus on town centre policy, promoting competition and improving consumer choice. These revised planning rules keep the important 'sequential test' that requires the most central town centre sites to be developed first and give councils more scope to refuse out of town development proposals that threaten the survival of high streets and small shops.

Consultation Questions

- 1a** Will the proposed changes support current and prospective town centre investment?
Yes No or Yes with reservations (please specify)?

Answer: No

- 1b** If No, please state why:

Comment:

The proposed changes seem to militate against town centre investment by making out of town development easier.

- 2** Does the scope of the new impact test achieve the right balance and is it robust enough to thoroughly test the positive and negative impacts of development outside town centres?

Comment:

No, it is not nearly robust enough and should take far more account to the excellent points in paras A.13 – A.20 (pages 53/54) concerning "Clone Town Britain"

- 3a** Is there scope to simplify and streamline the various impact considerations further?
Yes No or Yes with reservations (please specify)?

Answer: No

3b Comment:

Please see answer to Q 2; paras A.16, 17, 18, 19, in particular emphasizes the alarming shifts from traditional High Streets and the declining numbers of useful shops, such as fishmongers etc. \

This is very evident **in the town centre of Royal Tunbridge Wells**, where independent businesses are in danger of being undermined by shopping malls and out of town development

- 4a** Is the consideration of consumer choice and retail diversity as part of assessing the impact of a proposal appropriate and will it be sufficient to help promote competition?
Yes No or Yes with reservations (please specify)?

Answer: No

4b Comment:

We find Annex C - "Unintended Effects of the Need and Impact Tests" - far from convincing. Para C.43 actually opens with the words "*we have not found clear evidence of this in practice*". With regard to para C.37, high density may not always be a virtue.

Our one and only town centre supermarket in **Royal Tunbridge Wells** (Tesco) trades at nearly 300% of the national average rendering it uncomfortable and at times unpleasant to use.

- 5a** It has been suggested by some stakeholders that we should consider limiting impact assessments to larger development proposals and that it should be confined to retail developments. PPS6 and our proposed revisions maintain a flexible approach to the preparation of impact assessments for all main town centre uses and do not limit assessments to larger developments or retail proposals. Do you think our flexible approach should be retained?
Yes No or Yes with reservations (please specify)?

Answer: Yes

5b Comment:

Essential to maintain assessments for out of town development of any size and use.

Unfortunate out of town developments – e.g. in **Royal Tunbridge Wells**, include an out of town Cinema, leaving the town centre without that facility.

- 6a** Are the existing health check indicators in Chapter 4 sufficient to enable informed judgments to be made about the various impact considerations which have been identified?
Yes No or Yes with reservations (please specify)?

Answer: No

- 6b** If No, please state why:

Comment:

The health of town centres may be indicated in very many ways – e.g. the quality of the public realm; street furniture and paving, foot fall and traffic congestions; the standard of maintenance of property and elimination of 'grot spots', a preponderance of charity shops and eating establishment; integration of residential property etc.

- 7a** Do you agree with the proposed approach to the practice guidance which will support PIPS?
Yes No or Yes with reservations (please specify)?

Answer: No

7b Comment:

Part 6, on page 82, is so vague as to be of limited use. Much will depend upon the detail, but we view it with apprehension.

8 Other comments on the scope of the proposed changes:

Comment:

Generally we see this document a skewed to make out of centre development easier, whereas the need is to make it harder.

- 9 We are committed to producing policy that promotes equality of opportunity and good relations between people of different racial groups and eradicates unlawful discrimination. We would welcome views on whether the changes we are proposing to PIPS will impact differently on people from different ethnic groups, on people with disabilities and on men and women? We particularly welcome the views of organisations and individuals with specific expertise in these areas.

Comment:

The alarming trend towards out of town development is particularly difficult for the elderly living in town and others who do not drive cars.

– This is contrary to the trend to promote the discouragement of car ownership, which is reflected e.g. not needing off-street car spaces in town centre residential developments.

In Royal Tunbridge Wells, as regional shopping centre, there is now but one butcher left, one green grocer and one supermarket. So “competition issues and consumer choice” that loom so large in this document, have little meaning in the town centre.

For serious competition and choice in food stores, it is necessary to drive some 6 miles to Crowborough, thanks to out of town and edge of town supermarket trends.

At this moment Tesco announced that their edge of town (RTW/Pembury) store will be demolished and re-built at triple size. On the other hand at the RTW mainline railway station in the town centre a previous supermarket site (with a mutli-storey car park above) has been empty since 2005.

25 September 2008

Organisation: Royal Tunbridge Wells Town Forum (www.townforum.org.uk)

(Royal Tunbridge Wells Town Forum was formed by the Local Authority in view of the lack of a Town/Parish Council to bring Ward Councillors and Residents' Representatives together to address local issues of the town Royal Tunbridge Wells.)

‘Working Group LDF’

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