



## Draft Strategic Plan 2008 – 2011

1 February 2008 - Comments to the Draft Strategic Plan 2008 – 2011

**3 March 2008 – Response: TWBC Head of Community and Corporate Planning – Nazeya Hussain (BC)**

### Chapter 2 – Our Vision (p.5)

The simplicity of the vision to *“seek to enhance the quality of life for all”* is commendable.  
– However, “quality of life” is not just about basic necessities such as housing and health services. It needs also to be about such matters as cultural and leisure facilities, - the very activity which Chapter 8 - Prioritisation proposes to cut.

**BC:** This is the vision as set out in the sustainable community plan, which is based on extensive public stakeholder consultation.

Also, it is noted that delivery of the vision is related to the year 2020. While it is to be hoped that our children and grandchildren will indeed still be able to enjoy the benefits of a prosperous, accessible and attractive borough, it should not be overlooked that the present generation has similar aspirations and expectations.

**BC:** The vision reflects the long-term ambitions of the borough. The strategy plan details how, we will work towards this over the next 3 years.

### Chapter 5 – Tunbridge Wells: The Place, People and Council (p.10-15)

#### In the opening line, page 10

it is not right to say that *“Tunbridge Wells is uniquely positioned within the Heart of Kent”*.

– It is a fact of life that the Borough’s principal town of Royal Tunbridge Wells, together with a good deal of the rest of the Borough, is close to the Sussex border. More than half of the population of the borough lives in Royal Tunbridge Wells, a town whose key shopping catchment area and transport links are inextricably bound up with Sussex. Yet our Sussex neighbours of Wealden and Rother are not mentioned in the description of the Place, whereas more distant Kent districts of Ashford, Maidstone and Sevenoaks are.

- Better cross-border cooperation could be important to the future of the Borough, and to the town Royal Tunbridge Wells in particular.

**BC:** The Heart of Kent is used and recognised as a brand to promote and attract visitors to this area of Kent. It is an established and successful partnership with Ashford, Maidstone, Sevenoaks and Tonbridge & Malling Councils. I don't think that to suggest it is uniquely positioned dismisses the fact that it is on the border with Sussex. Indeed the following paragraph makes this relatively clear. Even if you just referred to uniquely positioned in Kent it would not remove the fact of its location. Would agree that future cross border cooperation will be essential in terms of addressing some of the issues that need to be addressed.

The description goes on to say that *“over seventy per cent of residents live in owner-occupied households”*, from which it follows that some thirty per cent or between a quarter and a third, do not.

– That figure is not broken down to indicate the split between Royal Tunbridge Wells and the rural areas. Parts of Royal Tunbridge Wells do, however, have something of a problem with properties that were once family houses, but have now been split into non-purpose built flats with absentee landlords.

- It is a problem that needs to be addressed, especially in the town centre.

BC: According to the Council's 2005 borough-wide Housing Needs Survey this was as follows:

- 71.6% owner-occupied.
- 15.3% social rented.
- 12.2% privately rented.
- 0.9% other (shared ownership scheme, tied to employment, etc).

**page 10 - bullet point** *“we also face significant challenges”* - *“Tunbridge Wells town centre is reliant on the retail economy and in recent years has suffered a relative decline in retail rankings in the face of increasing competition elsewhere”*

The feeling has been expressed that the Council's apparent obsession with 'retail ranking' is not one shared by residents generally.

– Residents, certainly, are concerned that the town of Royal Tunbridge Wells should be pleasant, viable and work well, but its 'retail ranking' in relation to other centres appears to be matter of some indifference to many residents.

BC: It is quite a factual statement that the centre is reliant on a retail economy and that its relative position has declined. The point around the statement here is that this decline is due to competition elsewhere, the use of the retail rankings is as an indicator that Tunbridge Wells is no longer as attractive a location as it possibly once was. We would quite agree that the retail rankings themselves have very little relevance to local people but in a wider economic and business context as the centre reduces in importance so does its attractiveness to new businesses. We both recognise that in the Forums words that Tunbridge Wells needs to remain pleasant, viable and work well and that to ensure this happens we need to address the wider challenge of competition from other centres as business and retail locations. We would argue that the importance we have attached to getting the Ritz cinema right demonstrates that one can improve the retail offer whilst maintaining the uniqueness of Tunbridge Wells.

**On page 11**

it is noted that *“The Council employs over 400 people, with fifty per cent living and working within the borough”*, so it follows that half do not.

– It is important that the high proportion of non-Tunbridge Wells people working in the Authority should fully understand the aspirations and expectations of the residents they are paid to serve. This is especially important at senior levels.

BC: All Staff, whether living locally or outside the Borough, works hard to ensure the Borough improves outcomes for all our residents and all staff are committed to the Council's aims and objectives otherwise they would not be in our employ.

The wording on **page 11**

goes on to make one of many later reference to *“regeneration”*.

– This is another of the Council's apparent obsessions that is not necessarily shared by residents. In his foreword the Leader of the Council opens by describing, rightly, the Borough of Tunbridge Wells as *‘an attractive and vibrant part of Kent’*; chapter 5 itself opens, again rightly with the reference to the *‘thriving town centre of Royal Tunbridge Wells ...’*. The term *‘regeneration’* can evoke image of places such as former mining areas of South Wales, former ship-building areas of Tyneside or London's Docklands, where previous uses have ceased and new ones need to be found.

- In Royal Tunbridge Wells town centre there are individual problems, such as the Cinema site and the former Safeway building that need to be urgently addressed, together with traffic congestion, pedestrian movement, parking issues and other particular point that need to be resolved. That is a matter of enlightened individual problem-solving, rather than wholesale 'town centre regeneration'.

BC: This is a reference to a job title. However there is a wider objection to the terminology being used, and that regeneration has images of Docklands. In some cases it does, and perhaps that is the point. The suggestion by the Forum is that there are only one or two individual sites to be addressed yet a subsequent comment by the Forum identifies the transport infrastructure as an issue and seeks that these need to be in place. To consider individual sites in isolation of a wider plan for the centre may only seek to exacerbate existing issues. If these sites are brought back into use, it is quite likely that they will attract more traffic and footfall to the town centre as a whole and

also to the specific site. Hence the use of the term “regeneration” and to emphasise that a more holistic planned approach is required. In addition, regeneration does not just encapsulate the town centres but how we address other areas where change maybe required to improve the environment of specific areas including industrial sites.

### The diagram on p.13

indicates the way in which the Cabinet receives ‘*Advice and Governance*’ inputs.

The ‘Advice’ category includes “*Group (political input)*”.

– Party Group Meetings are not open to the public and, in some Councils, majority party Group Meetings are suspected of being more than ‘Advice’, perhaps effectively being places where decisions are taken for rubber-stamping at Council Meetings. Be that as it may, it could be for consideration, whether the internal workings of political party machinery would be better not included in a diagram of this sort. It possibly goes without saying that Councillors who have been elected on the basis of a political party manifesto will be subject to the internal workings of their particular party machine, as well as listening to their constituent of any party persuasion or none.

On the other hand, there could be a case for an ‘Advice’ input being seen to exist from the lower tier of Local Government, namely Parish and Town Councils, and in the case of the unparished area, the Royal Tunbridge Wells Town Forum.

- Thus, it is suggested that ‘Parish/Town Councils, RTW TF and Business Forum input’ might be substituted for ‘Political Party Group meetings’ in the Advice box in the diagram.

BC: This has been amended to read “(political advice) following discussions with the leader of the council.

## Chapter 6 – Our Four Corporate Priorities (p.16-30)

It is suggested that ‘Chapter six’ in “*Underpinning the delivery of our Corporate Priorities are our three internal customer service commitments – further details are set out in Chapter six*”, should read ‘Chapter seven’.

### Priority 1: Promoting and maintaining a thriving and diverse local economy (p.17-19)

#### Reducing Traffic Congestion (p. 17)

It is noted with concern, but not altogether surprise, that “*Average traffic flows in the borough are about twice the national average*”. The RTW Town Forum agrees with the statement that “*It is essential that new development does not take place without adequate transport infrastructure*”.

– This has been our stated position in commenting upon the recent Core Strategy <http://www.townforum.org.uk/consultation/corestrategy-rtwtfcomments100108.pdf>.

Also, we should like to see the Town Centre of Royal Tunbridge Wells more pedestrian-friendly.

A so-called “*a firm commitment to the provision of transport infrastructure*” is no substitute for having that provision actually in place. In this connection, we see close cooperation with East Sussex and Wealden Councils as no less important than joint working with KCC and Tonbridge & Malling Council.

BC: In terms of seeking solutions to traffic issues within Tunbridge Wells then the wider position needs to be considered. Additional road closures could improve the environment of those streets however the traffic would need to be accommodated somewhere else. These considerations cannot be taken in isolation and the development of sites into productive uses, and if we trust are successful, will attract greater volumes of traffic and footfall that needs to be considered.

#### Working in Partnership (p. 17)

– Comments on ‘Regeneration’ have been made earlier and the precise role of the ‘*Development Partner*’ could do with greater clarity.

We also seek clarifications on “*We have approached major businesses and landowners in Royal Tunbridge Wells town centre to bring forward development of key sites ...*” and “*we are establishing a town centre business forum*”.

BC: Given the early stage in discussion and appointment of the Development Partner it would be inappropriate to be prescriptive about the exact role of the Development Partner.

The Council in its role and in seeking to address grot spots has approached and remains in discussion with businesses and landowners of specific sites including the former Morrison's Site and Cinema Site.

We are indeed seeking to establish a town centre business forum to engage with the business community. This will meet on a quarterly basis to identify and discuss issues of relevance to the business community within Tunbridge Wells. It maybe that some of these issues are also relevant to a wider audience however the business position is. It is essential that the Council establish good communication channels with its resident and business communities.

### table on page 19

The Town Forum sees the production of a '*Town Centre Parking Policy*' (comments in the Core Strategy) and serious "*plans for park and ride*" facilities to be matters of urgency.

– In this connection we would draw attention to the Town Forum's 'Position Statement on Planning' of June 2007 [http://www.townforum.org.uk/planning/tf\\_positionstatement\\_planning\\_june2007.pdf](http://www.townforum.org.uk/planning/tf_positionstatement_planning_june2007.pdf), regarding the Southern end of the town and use of the 281 Town Centre Bus Link.

On the matter of North Farm, regard needs to be had to the inadequacy of the railway crossing / tunnel in North Farm Road.

BC: It is recognised in the Core Strategy that new development in the town centre would put pressure on existing transport infrastructure and parking. This would need to be addressed by measures, which could include a comprehensive approach to parking policy, and the introduction of a Park and Ride. Studies to be commissioned in the near future and a business plan has to be prepared

## Priority 2: Care for our Environment (p.20-23)

### table on page 22

We strongly support the improvement of the "*street scene*", but are anxious that the "*delivery of revised and updated street lighting and other street furniture*" should be in keeping with the character of the historic Town Centre of Royal Tunbridge Wells.

The words "*where appropriate*" should be omitted from action aimed at dealing with the town's 'grot spots' ("*Continue to work to clean up/encourage the redevelopment of grot spots taking formal action where appropriate*"), as this could just turn out to be a recipe for further inaction.

BC: The Council will continue to use the existing heritage design standards when maintaining and renewing its street furniture. The vast majority of the street light columns in the Town Centre are the responsibility of Kent County Council and we will continue to lobby for the installation of heritage style columns when replacement schemes are proposed.

With regard to the use of enforcement action against grot spots, the term 'where appropriate' signals that there maybe circumstances where a site, whilst termed a Grot Spot, may not actual fail any of the legal standards and therefore formal enforcement action is not possible. However, the Council may take informal steps to bring about improvements.

The "Ten worst grot spots in the Borough" are not identified in the Strategic Plan, and it would of interest to know whether all or any of these are in Royal Tunbridge Wells.

<http://www.townforum.org.uk/focusgroup/brightenup261006.pdf>

BC: The list of Grot Spots needs to be refreshed but the focus of activity has been on sites in Tunbridge Wells

There is also reference to the implementation of the Local Plan - *“Consult on a brand new Local Development Framework to guide future development, whilst implementing the current Local Plan (2006)”*. That plan was the product of a previous planning regime in the Borough Council, that has now been replaced by a new team working on a new development framework.

- The old-style plan had several bad features, such as the removal of the shopping notation on Camden Road, and it is essential that these are not implemented before a more enlightened approach is forthcoming under the new arrangements.

We strongly support the aim to *“Maximise the quality of existing TWBC parks”* and have expressed concern for the protection of the setting of Dunorlan Park, in particular, from nearby intrusive development.

**BC:** The Planning and Compulsory Purchase Act, 2004, introduced a new system of ‘spatial planning’, by which Regional Spatial Strategies and Local Development Frameworks will gradually replace County Structure Plans and Borough Local Plans to constitute the development plan for the Borough. However, under the interim arrangements, which exist whilst Councils transfer to the new system, the adopted Local Plan is ‘saved’ until March 2009 (three years from when it was adopted). This reflects the fact that the policies within it are up-to-date and have been tested at examination by an independent Inspector. Notwithstanding this, consultation takes place earlier in the new process of producing planning documents, providing the opportunity for earlier input by stakeholders.

### **Priority 3: Have housing suitable for local people (p.23-25)**

#### **table on page 24**

Aim by March 2009: *“Reviewed our affordable housing policies in the Local Development Framework to contribute effectively to meeting housing Need”*.

- The Town Forum is keen to see an early raising of the percentage of affordable housing from 30% to 40% and a lowering of the threshold, preferably in advance of the new Local Development Framework.

**BC:** The Council cannot amend its existing Local Plan policies regarding affordable housing percentages and thresholds in advance of the LDF but will do so at the earliest opportunity as part of the LDF. The Council has to take in to account wider considerations when considering thresholds and percentages of affordable housing to be delivered.

#### **table on page 25**

*“Inspected 20 HMOs and brought ten up to the required standard”*.

- The bringing of only TEN houses in multiple occupation a year, up to the required standard, does seem a rather low ambition.

**BC:** These targets were originally set as part of the Council's Private Sector Renewal Strategy 2004-2009 which was adopted in 2004. The targets will be reviewed when this Strategy is reviewed in 2008/09. There are as ever capacity issues when setting targets and we prefer to set realistic targets rather than aspirational.

### **Priority 4: Develop Safer & Stronger Communities (p.26-30)**

#### **table on page 28**

includes the subject ‘Ward Walks’ - *“Continue to undertake four Ward Walks with key partners”*.

- Clearly, *“Work with and consult the community to identify the improvements which will most benefit local residents”* must be a subject that should be dear to the Town Forum’s heart. However, the Strategic Plan does not state where, how or when these walks will take place, beyond envisaging a rate of four per year across the Borough. Indications so far have been that such walks are not expected to take place in Royal Tunbridge Wells until the very end of the Strategic Plan period, or beyond.

Moreover the central spine of Royal Tunbridge Wells, from Grosvenor Road, through Mount Pleasant and High Street to The Pantiles, currently straddles three wards, namely Culverden, Park and Pantiles & St Mark’s. Undoubtedly, it would be absurd to walk one side of Mount Pleasant in Culverden Ward on one day, and the other side in Park Ward on another day a year later.

<http://www.townforum.org.uk/planning/rtwunparishedwards-map.jpg>

- It would seem sensible for the whole central spine to be walked in one operation at a date well in advance of the Town Centre Master Planning process. Otherwise this potentially useful initiative seems unlikely to make much sense in Royal Tunbridge Wells in the foreseeable future.

**BC:** The 2008 Ward Walks are due to take place in the ward of Sherwood and parish of Frittenden in June, followed by Goudhurst and Pembury in September. The draft programme intends to target one ward in Royal Tunbridge Wells in 2007/08 and one in 2008/09 before increasing to two further on in the programme. Ward Walks were originally targeted at ward level within Royal Tunbridge Wells, to allow comparisons to be made with previous survey responses and research. It was also felt that as the programme developed, there would be an increase in both capacity and resources to respond to the demand and densely populated area of Royal Tunbridge Wells. Although a programme has been drafted for the next six years, it is not set in stone. Therefore we will review the draft programme, taking into consideration the layout of the Town Centre and timescales of the Town Centre Master planning process

#### **table on page 29**

There is a proposal to *“Devolve elements of management of Woodbury Park Cemetery to the Friends of Woodbury Park Cemetery”* this year. The Friends of Woodbury Park Cemetery ( <http://www.fwpc.co.uk> ) is a relatively new voluntary organisation, and its public spirited volunteers are doing excellent work in stimulating interest in this unique mortuary garden, and in supplementing the Council’s limited management programme.

- However, while the Friends should clearly be encourage to continue to cooperate with the Council in the way that they have, it would not be appropriate to ‘devolve’ formal management responsibilities in the manner described. A different from of words is needed here, in consultation with the Friends.

**BC:** The Friends of Woodbury Park Cemetery have suggested the following wording and we will use this in the final version "encourage and foster the conservation and education activities of the Friends of WPC and their involvement in decision taking".

Aims throughout the plan: *“complete a new community centre in Sherwood” / “supported the introduction of new services to the community centre funded in a sustainable manner” / “achieved sustainable development of community centres”*

– Community Centre facilities at Sherwood are clearly important; however proper and long-term community centre facilities are also required in the Town Centre.

**BC:** The Borough Council currently runs the Camden Centre in Royal Tunbridge Wells, which is a large centre over 3 floors and provides for a wide range of activities. There are over 30 additional community facilities in Royal Tunbridge Wells and through partnership working, particularly in relation to the extended schools agenda, we aim to broaden the availability and use of existing centres. The Borough Council sought to provide a new centre in Sherwood because of the lack of facilities in this area and the very poor condition of the Sherwood Community Centre. As part of the master planning process for Royal Tunbridge Wells we will be consulting with local residents and stakeholders about their needs. Some of the “community centres” have low occupation figures which may indicate there is a surplus rather that a shortfall in such provision.

Aim by March 2009: *“Trinity to have expanded its youth programme”* is obviously important.

– As matters stand, there is a waiting list for the programme and it is vital in today’s society that opportunities exist for young people to engage in worthwhile activities. Quite how this item fits, or does not fit, with the cost-cutting exercise in Chapter 8 *“Grants to outside bodies in non-priority areas”* is another matter.

**BC:** . / .

Mention is also made of the Museum *“Target our community sports, arts and museum programmes to those most in need”*

– The emphasis is on targeting museum programmes *‘to those most in need’*. Nobody would surely quarrel with the principles of helping those most in need and that should no doubt be built into the programme.

- However, Tunbridge Wells Museum is a valuable resource from many points of view. With the closure of the ‘Day at the Wells’, the Museum is one of the very few attractions that our valuable tourist industry can offer, beyond the historic ambience of the town and its shops and eating establishment. The Museum also has a valuable educational aspect for schools and adults alike, and its collections are part of the town and the area’s cultural heritage.

- Yet the TW Museum is not all that it could and should be. The full potential of the Art Gallery is rarely in evidence, and the former Library Lecture Room is now of little public benefit, while excellent costume, genre painting and other collection remain in store. The focus of the Museum in recent years has been in attempting, unsuccessfully so far, to attract lottery money. This, however, should not be allowed to become an excuse from continuing a Museum and Art Gallery arrangement that compares unfavourably with many other tourist destinations, and which could be so much better, both for residents and visitors.

**BC:** The Council recognises the potential of the Museum and Art Gallery and will continue to find an appropriate solution to improving the service.

## Chapter 7 – Our Three Customer Service Commitments (p.31-34)

### Working in Partnership

*“The joint delivery of a Gateway with Kent County Council”*

It is important that the Gateway project actually delivers a better service, not a worse one.

Thought need to be given, e.g. on how paper copies of submitted planning applications can be scrutinised in future and archival old deposited plans accessed.

**BC:** ./. .

### table on page 34

*“Made a hundred per cent of consultations available on the internet (where possible)”*

Remove ‘where possible’.

**BC:** ./. .

## Chapter 8 – Prioritisation (p.35-37)

### Non-priority Issues (redirect resources)

### table on page 36

*“£40k reduction in Trinity grant to bring their grant in line with their business plan”* - see also Chapter 6 ‘Trinity grant’. Trinity provides a vital contribution to the ‘range of cultural and leisure offers’ that are seen in Chapter 2 as part of the vision for Tunbridge Wells.

– The facility at Trinity is a truly community based one and numbers of volunteers act as ushers, duty managers, helpers on the box office and in other ways. Without their help Trinity could not function.

Nevertheless volunteer help is not enough, if the degree of professionalism and quality of programme that Tunbridge Wells reasonably expects, is to be maintained. The need to revise its Business Plan to reflect a £40k cut (down to £90k) in funding has been followed by an even greater cut by the Arts Council.

- Yet it is important to Tunbridge Wells, and the area around, that Trinity survives to provide its key cultural and leisure facility for residents and visitors. Fundamental to this will be sympathetic and practical help of the Borough Council. Clearly, public funds should not be used to a greater extent than is necessary to provide the appropriate level of service.

**BC:** The council recognises the benefits that Trinity contributes to the borough and therefore we have been discussing an appropriate level of funding with Trinity Board for the last two years. We believe that £90k a year is an appropriate level of funding that is sustainable in the medium term and is currently the amount the Council can afford amongst all other demands on funding.

Dr. Philip Whitbourn  
RTW Town Forum 01.02.2008

submitted by Dr. Daniel Bech ( e-mail: [improve-rtw@townforum.org.uk](mailto:improve-rtw@townforum.org.uk) )

on behalf of Christopher Thomas, Chair Royal Tunbridge Wells Town Forum

cc: Samantha Timms, Secretary, Royal Tunbridge Wells Town Forum