

Sub Committee, Recreational Open Space
Town Forum

13th February 2006

Dear Matt,

The Town Forum Subcommittee comprising Mary Wardrop, Jenny Blackburn and Jane Fenwick formed to respond to the Recreation Open Space Planning Document has met to consider our submission. We have also visited many of the Recreation Open Spaces to appraise their location and condition, and we have read and discussed:

The Recreation Open Space Supplementary Planning Document Consultation Draft January 2006
The Sustainability Appraisal for the Recreation Open Space Supplementary Planning Document
The Tunbridge Wells Borough Local Plan Review (2001,2002)
Public Inquiry Inspector's Report (June 2005)

We consider that Tunbridge Wells should provide a high standard of recreation open space for residents and visitors. This should be sufficient to maintain and enhance the living standards of all its population and to ensure that the town remains an attractive place to live and work. We have noted that in several existing communities there is poor provision of recreational open space.

Recent development trends and policy decisions have affected how, where and what recreational open space is needed now and for the future, but they do not rectify deficiencies from the past. The Supplementary Planning Document exists to enable the Borough to meet the demands created by new housing developments. However, recent urban 'brown field' site development has:-

- been too small to qualify to require recreational open space to be provided on the site
- much of this accommodation has been of one and two bedroom apartments creating a higher density of population
- new 'family' accommodation often only has small private gardens
- developers have favoured sought-after locations in the town centre
- with the exception of Oak Road Doorstep Green, existing recreational open space has not been expanded in size, but instead used more intensively
- increased population and traffic densities have made recreational open space more difficult to access for key user groups
- population expansion of accommodation by 5000 homes is planned by 2026
- changes in lifestyle to encourage fitness, health and well being throughout a longer lifespan should be considered in planning Recreational Open Space.

To ensure that our submissions are adequately considered by town Forum members, we feel in should be circulated before the next meeting on 23rd February 2006. The submission must be received at TWBC by 5pm on 27th February 2006.

Regards,

Mary Wardrop
Jenny Blackburn
Jane Fenwick

**RESPONSE TO RECREATION OPEN SPACE
– SUPPLEMENTARY PLANNING DOCUMENT**
by The Town Forum for Tunbridge Wells

The Town Forum of Tunbridge Wells represents the un-parished areas of the Tunbridge Wells.

1. Deficiency in Recreational Open Space against NPFA standards

The Town Forum has noted with concern how much the provision of recreational open in Tunbridge Wells falls short of the accepted national standard set by The National Playing Fields Association (NPFA). In terms of overall allocation, youth/adult and child playspace, the provision in the Plan area (RTW), and in Tunbridge Wells (TW) in particular, of Recreational Open Space is significantly below this NPFA standard.

The table below demonstrates how significant these deficiencies are in the Plan area (RTW) and TW against the NPFA standard (hectares/1000 population). (We note with concern that the statistics for RTW and TW relate to 2000 and are therefore out of date as commented upon by the Public Inquiry inspector [section 9])

NPFA : Overall	2.4ha/1000	RTW: 0.57ha/1000	TW: 0.43ha/1000
NPFA : Youth/adult	1.6ha/1000	RTW: 0.7ha/1000	TW: 1.1ha/1000
NPFA: Children's	0.8ha/1000	RTW: 0.43ha/1000	TW: 0.43ha/1000

These deficiencies are noted in the Sustainability Appraisal for the SPD (4.2.1 and in 4.2.2) *“Incoming residents will place a burden on the existing recreation open space provision which is deficient in many areas. This could lead to a reduction in quality of life.”*

2. Deficiency in Recreational Open Space in un-parished areas of Tunbridge Wells

In Appendix 2 of the SPD, the audit of recreation open space shows that despite the concentration of population within the town centre, 11 of the 17 areas have a higher rate of provision than Tunbridge Wells. In the provision of youth/adult recreational open space, only two of the 17 parishes have less than that provided in Tunbridge Wells eg. 0.6ha/1000 in Southborough and 0.2ha/1000 in Frittenden compared to 0.7ha/1000 in Tunbridge Wells:

3. Deficiency in Recreational Open Space in areas of social and economic need

The SPD does not address this overall deficiency and lack of adequate provision for children and youth/adult has implications for social inclusion. It is compounded by the fact that existing provision of Recreational Open Space is not allocated to other areas of social and economic need. The Sustainability Appraisal for the SPD (Non-Technical Summary) states that *“Key social issues relevant to the Recreation Open Space SPD relate to deficiencies in recreation open space provision. It is important that the situation does not worsen.”*

4. Recreational Open Space is unevenly distributed across the area

Furthermore, the provision of Recreational Open Space is not evenly distributed across the town. The Sustainability Appraisal to the SPD (4.2.1) states that *“19 residential areas within Tunbridge Wells do not have reasonable access to equipped areas of play.”*

Proposals from the Town Forum

1. Recreational Open Space SPD identified major deficiencies in existing provision in established communities of Recreational Open Space, and the Sustainability Assessment confirmed this in its analysis which showed that many of the proposals in the SPD as having only “*minor positive impact*” on many objectives and “*neutral impact*” on others.

The SPD should aim to establish the NPFA standard as a minimum, and to exceed it in order to rectify existing deficiencies.

2. The level of deficiency against the NPFA standard is such that the SPD should aim to rectify existing deficiencies in total provision of Recreational Open Space to meet the needs of the planned expanding population to bring the average ha/1000 population to the NPFA standard as a whole, and for all age groups. The arbitrarily set level of 150 bedspaces as a threshold is too high for the circumstances of Tunbridge Wells. **Set a lower bedspace threshold.**

3. The SPD specifies developers need not provide for or make contributions towards recreational open space if *Area of equipped children’s playspace is above 0.3ha/1000*. This compares to the current level in TW of 0.43ha/1000 and NPFA 0.8ha/1000. The SPD does not explain the grounds for reducing the provision for children’s playspace to below that existing now and to less than half that laid down by the NPFA standard. (See Inspectors Report page 323 para 9.31) **Establish 0.8ha/1000 population as standard for children’s playspace as a minimum.**

4. The provision of areas of youth/adult open space in the SPD is, however, aimed at achieving the NPFA standard of 1.6ha/1000, with developers set a threshold of 1.6ha/1000 population to provide for or make contributions towards Recreational Open Space. **Rectify existing deficiencies in youth/adult open space by exceeding the NPFA standard above the minimum.**

5. **The SPD should aim to use all existing recreational open space to their best advantage by maximising their use and improving access to and between new and existing recreational open spaces.** (The Town Forum welcomes the new Oak Road Doorstep Green and play area that meets this objective)

6. **To combat traffic levels arising from higher density developments, improved pedestrian, disabled and cycle access to Recreational Open Spaces needs to be included in the SPD.** (Pedestrian controlled road crossings are currently rarely provided for access to public parks and commons in Tunbridge Wells.)

7. **The needs of disabled users of recreational open space must be provided for in this SPD, together with the provision of specialised play equipment for disabled children in NEAPs and LEAPs.** All Recreational Open Space information boards should include Braille.

8. **Provision of facilities for team sports should wherever possible be provided by dual use of educational facilities to maximise use by the community as a whole.** (See Local Plan, Deposit 2 [2002] page 215, para 10.39). This would prevent green Recreational Open Space being lost to hard surface team sports.

9. **All new and existing Recreational Open Space should be included in the proposed Alcohol Control Zones and measures to enforce dog fouling control measures be put in place.**

10. **The SPD should take into account the informal recreational value of the 250 acres of Commons and other woodland bordering recreational open spaces.** Whilst these areas are not within the scope of this SPD, it is our belief that making these commons and woodland areas more inviting would provide a different range of opportunities for healthy activity and exploration, supplementing the formal requirements of NEAP and LEAP provision.

11. **All agencies involved in the allocation of land and its facilities should consult early in the process to maximise the provision of Recreational Open Space.** (TWBC, KCC including KEC, PCTs and the local communities)