

Royal Tunbridge Wells - Town Centre Area Action Plan

Comment Receipt

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DEVELOPMENT NEEDS

The development needs in and around Royal Tunbridge Wells have been identified from an extensive evidence base. In some cases, policies in the Core Strategy state that specific types and quantities of development should be provided.

Question 1

Do you consider that Royal Tunbridge Wells has any further development needs that should be added to the list (which you will find on pages 3-4 of the RTW consultation pack), or conversely, that any identified needs are incorrect and should be removed from the list? Please specify and provide evidence to support your answer in the comments box .

The Development Needs are remarkable for not placing due emphasis on the Town Centre being an *existing* residential area as well as a potential zone for new housing, for employment opportunities, for retailing, for leisure and recreation and for improved infrastructures.

The Development Needs should include a recognition that residents have a right to the secure habitation of their dwellings without undue noise, environmental degradation (especially litter dropped because of the shopping or catering experience of others) or catering stench, especially after 9.00PM and at weekends (at least Sundays).

There is also no developmental provision for adequate residential parking within the Town Centre and it should be made clear that new residential housing or office provision (above all) should not reduce service provision for existing residents because of a failure to invest. The Council must demand that developers invest on behalf of the whole residential community rather than give priority to tourists and shoppers.

The failure to include sites below 0.2ha in area for decisive conservation action is a major limitation within the Plan and needs to be reconsidered.

Finally, the Development Plans should include a determination to upgrade the housing stock in the Town Centre by discouraging buy-to-let, forcing absentee landlords to maintain their properties in full repair and remove 'grot spots' on their land, force full compliance with planning regulations in regard to conservation matters (such as the siting of multiple satellite dishes) and encourage conversion of traditional properties back into family homes as has happened in the inner city areas of Inner London.

Above all, there should be a strong determination in the Development Needs that the Inner Town will contain no buy-to-let ghetto areas as currently exist in the bulk of Lime Hill Road and Dudley Road.

TOWN CENTRE BOUNDARY
(see page 6 of RTW consultation pack)

Initial comments were sought on a draft boundary for Royal Tunbridge Wells town centre in April 2009. The boundary now proposed has been amended, where appropriate, to take account of those comments.

Question 2

If you feel strongly about the boundary now proposed and wish to comment further, please do so in the comments box below.

We have no comments on the general boundary but we have serious criticisms of the drawing of the boundary of Quarters which we cover below.

Question 3

Do you think that Calverley Grounds should be included within the town centre boundary as an integral part of Royal Tunbridge Wells Town Centre? Yes

You may support your answer by providing additional comments in the box provided.

It's a no-brainer ...

ISSUES FOR ROYAL TUNBRIDGE WELLS, INCLUDING THE TOWN CENTRE

The Borough Council has identified a number of issues affecting Royal Tunbridge Wells town centre and the wider town (see page 7 of the RTW consultation pack). Policies to be provided in the Town Centre Area Action Plan, the Allocations Development Plan Document and the Development Control Policies Development Plan Document can seek to address these issues.

Question 4

Have the main issues for Royal Tunbridge Wells and the town centre been identified correctly? No

If "no", please use the comments box to explain what other issues you feel should be addressed.

The issues have been dealt with inadequately by the planners. The point covered above stands here - the utter failure to recognise and take full account of the *existing* residential interest within the Town Centre as well as the surprising lack of reference to conservation and to enforcement of conservation standards. I refer you to the answer to Question 1 for a full account of what is missing in this context.

What strikes this consultee as particularly absurd is the touting of an 'urban village' concept (unless the model is Disneyland) where there are no residents of consequence - it is as if the residents are to be consigned to the role of ghosts flitting in-between the shoppers, tourists and employees who commute from outlying villages. It strikes one as suitable only for a programme of work for the Inner Town whose political guiding light is the rural village that treats the Town Centre as little more than its service provider.

A particular lack is any reference to residential parking so that the residents may justifiably fear that the Council wishes to squeeze residents out of their own streets in order to make space for incomers. In any other town of this size, the Council would be active in preserving the residential character of local streets (no doubt around Camden Road as well) and ensuring moderate cost but plentiful parking for incomers.

We are also concerned at the fashionable 'green' commitment to cycling on two separate ground - both safety and effect on street parking. Cyclists are notoriously arrogant about their right to the road and are frequently seen in London to jump red lights at pedestrian crossings placing pedestrians in danger.

Similarly, cyclist lanes can take up scarce parking space and the encouragement of a cycle network may well be a left-over from the social engineering ambitions of the previous National Administration. A cycle network is not suitable for a highly pedestrianised Town Centre.

TOWN QUARTERS

Question 5

Do you agree with the defined town quarters which are identified on Map TW04 in the RTW consultation pack? No

Please comment and/or specify how you think they could be amended.

It is remarkable to the point of negligence that the residential part of the Inner Town comprising York Road, Dudley Road and Lime Hill Road, the small streets off Mount Ephraim and the small streets to the South of Church Road have not been designated as a single residential 'Quarter'. It is the only area omitted from any Quarter and it shows a singular contempt for the residents who live close-packed in that zone.

Worse, it is clear that the Retail Quarter has been allowed to impinge directly on the residential Inner Town and that many residents South of Church Road have been dumped willy-nilly into a Business Quarter which suggests that they will be encouraged out of their homes in due course in favour of various professional services.

This is very disappointing after the many representations made direct to the previous Leader of the Council and to Council Officers and through the Town Forum for the residential interest in the Town Centre to be recognised and it indicates a degree of bureaucratic arrogance of staggering proportions.

Question 6

Do you think any of these quarters need particular improvement? Yes

Please specify which quarter(s) you think need(s) improvement and why.

We have designated above the necessity for an Inner Town Quarter and this needs substantial improvement (York Road, Dudley Road, Lime Hill Road and the small residential roads to the South of Church Road and to the North of Lime Hill Road). The improvements required are reviewed in Question 1 but can be summarised here as:-

- . Enforcement of planning and conservation rules
- . Discouragement of 'buy-to-let'
- . Encouragement of conversion to family homes
- . Clearance of sites that are 0.2ha in area or smaller
- . Residential parking as a norm
- . Removal of and repair of existing street furniture
- . Limitations on licensing for public entertainment in the immediate vicinity
- . Improved policing against drunk and disorderly after 11.00PM
- . Ban on fireworks on the nearside of the Commons
- . Improved litter-gathering
- . A noise patrol after 11.00AM and on Sundays

MOVEMENT AND ACCESS

Vehicular

Question 7

What are your views on current parking provision in Royal Tunbridge Wells? Please give your views and make any additional comments in the box.

There is inadequate provision for residential-only parking within the area that we have designated as the 'Inner Town Residential Quarter' (York Road, Dudley Road, London Road, Lime Hill Road and the small streets to the South of Church Road and North of Lime Hill Road)

Question 8

Do you think park and ride would be well used if this was introduced in Royal Tunbridge Wells? Yes

Question 9

Where do you think a park and ride scheme(s) would be best located? Please specify or make any additional comments you may have in the box provided.

More information on proposals are required.

Question 10

What other transport and/or road improvements do you think could be made to ease congestion in Royal Tunbridge Wells? Please give details in the comments box.

Our only interest is in residents only parking in the Inner Town Residential areas.

MOVEMENT AND ACCESS

Pedestrian and cycle

Question 11

Do you think the town is adequately linked to the surrounding residential areas through good and well managed public footpaths and cycle routes? Yes

Please make any additional comments in the box provided.

Note our concern that cyclists can be a danger in highly pedestrianised areas and may remove limited parking facilities for residents in the 'Inner Town Residential Quarter' (see above). Local people are likely to fight vigorously against any cycling scheme that passes through residential roads for these reasons.

Question 12

Do you think the pedestrian crossings are adequate within and around the town? Yes

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Do you think the pedestrian crossings are adequate within and around the town? Yes

If you answered "no", where do you think improvements could be made?

Broadly speaking, yes ...

Question 13

Do you think the town could benefit from any public space improvements (for example, better and/or more seating, signage, etc)? Yes

Please specify.

There is no seating required in the Inner Town Residential Quarter (for definition, see earlier answers) but signage is often excessive, unnecessary and in poor repair. An audit is required of all signage in the Inner Town Residential Quarter (as defined above) and unnecessary or unsightly signage removed.

LAND USES

Question 14

Do you think there are enough shops in the town centre? Yes

If you answered "no", what type of shops would you like to see more of (for example, department stores, specialist shops)?

There are sufficient retail outlets in the town. This is a matter for the market.

Question 15

Would you like to see more cafés and/or restaurants in the Town Centre? No

If you answered "yes", where would you like to see them?

There are currently sufficient cafes and restaurants in the town.

Question 16

Do you think there should be more offices in the Town Centre? Yes

If you answered "yes", where do you think these would be best located?

For reasons of economic sustainability, it would be advisable to balance out retail and catering with more professional service office space but the Inner Town Residential Quarter (as defined above) should be ring-fenced from further office development.

Question 17

Do you think there should be more residential development within the town centre, or should it mostly be located on the outskirts of the town? Please specify where.

The existing residential presence in the town should be upgraded to ensure a stronger family and mixed community presence and policy should be aimed at sustaining the existing community and strengthening its bonds rather than increasing its scale or size.

There are proposals to organise the Inner Town Residential Quarter (as defined above) into an organisation capable of making strong and informed representation to the Council on the basis that the TCAAP has shown that Council regard for the existing residential community can clearly not be taken for granted.

Question 18

What do you think should be the priority for the Longfield Road/North Farm area? Examples are: better transport links; more industrial and/or business uses; leisure uses, etc. Please specify.

We have no opinion on the Longfield Road/North Farm area other than that the more bulk purchasing is diverted to that area, then the greater the chances that the Town Centre will become sustainable as a thriving mixed community.

GREEN ASSETS

Question 19

Parks and areas of woodlands can provide different functions and are often used in different ways.

Do you use your local park and/or visit local woodland? Yes

If yes, which park and/or woodland do you use and for what reason do you visit? If no, please state which is your local park and/or woodland (if known) and give reasons why you do not use these areas.

The natural park of the Inner Town Residential Quarter is the Commons and this is of great concern to the residents. However, we recognise that this is not within the jurisdiction of the Council except indirectly.

The other natural open space of particular value to the Inner Town and to the Town Centre as a whole is the churchyard surrounding the Trinity Theatre and this needs to be preserved for community use.

Question 20

Do you think there are any areas of Royal Tunbridge Wells that are lacking in public open green spaces? If so, please specify.

No opinion.

Question 21

Do you think there should be more street trees and planting around the town? Please specify any particular areas that you think could benefit.

In general, the more trees the better so long as they do not damage buildings.

SITE-SPECIFIC ISSUES

Question 22

Please refer to pages 8-12 of the RTW consultation pack

Do you agree with the process by which the Borough Council has filtered out those sites that either do not need to be allocated by virtue of their size; or should not be allocated because they are unsuitable for development? Disagree

Please make any additional comments you may have in the box provided.

We strongly disagree with the decision to filter out 'small identified sites' and find this puzzling in view of the strong feelings of residents about what were named 'grot spots' by Daniel Bech. In our view, the Town Centre requires an active strategy for the cleaning up and oversight of such small sites, including tough enforcement measures against landlords who fail to maintain them or who breach conservation or planning regulations.

Question 23

Do you wish to make any comments about a specific site? If so, please write the site reference number and your comments in the box provided. Please comment, in particular, on the uses it is considered to be suitable for.

We refer to the frequent presentations made on grotsspots by Daniel Bech and refer the Council to the records of both his estate and those of the Town Forum. It remains puzzling that this intensive public-spirited work seems to have been treated so dismissively by the Council's Planners by excluding any site of 2.0ha or below from allocation considerations.

Question 24

Do you think there are particular sites and/or areas that are not suitable for future development? Please specify and state why you think they are not suitable.

In our view, all existing residential properties within the Inner Town Residential Quarter should be allocated for improvement, upgrading or development as traditional family homes (conversion back from multiple occupancy) but no *existing* residential property in this zone should be given permission to become office space without another building of equivalent size becoming available for residential within the Inner Town. Some swapping to concentrate office space into clusters would be reasonable.

Question 26

It may be necessary for the Borough Council to identify additional sites to meet the Borough's development needs. Are there any areas of Royal Tunbridge Wells that you think should not accommodate any further development of a particular type? Please be specific about your reasons.

As noted above (Question 24), the stock of residential property in the Inner Town Residential Quarter (see above for definition) should remain precisely what it is but be upgraded into family homes, especially at affordable levels. This zone should see no further *increase* in retail or office development.

The specific reason for this is that this zone represents the central residential hub for the 'urban village' concept and requires protection if it is not to degenerate into a business district surrounded by a 'buy-to-let' ghetto.

ANY OTHER COMMENTS?

Question 27

If you have any additional comments about Royal Tunbridge Wells that you consider the Borough Council should take into account when preparing the Town Centres Area Action Plan DPD and/or Allocations DPD, please make them in the comments box below.

Assuming that all the comments made above are taken as read, we assert that the Inner Town Residential Zone (as defined above) is an essential and neglected component of the urban village concept and that it requires concentrated conservation attention as bridge between the economic retail centre and the Commons as leisure facility.

To do this effectively requires 'joined up' thinking between planning, environmental services and licensing to insulate it from the worst effects of the night time economy, conserve the best of its cultural assets and add it to the general attractiveness of the town as tourist destination whilst, at the same time, providing a ready 'walk to' customer base for small shopkeepers.

Small shopkeepers may be under considerable pressure if this Inner Town Residential Quarter collapses as incomers do all but specialist shopping in out-of-town markets and on Longfield Road/North Farm, while tourists and shoppers will be put off the town if the zone becomes a ghetto of cooking smells, litter and drunk and disorderly persons between the Commons and the main shopping centre.

The 'urban village' concept requires a mixed economy with a moderate and healthy mixed class and generational residential base and the Inner Town zone along with Camden Road and the residential area on East side of the High Street provides sufficient residential base for this.

In return, the residential areas require and deserve some restraints on the night-time economy, significant improvements in policing and environmental services enforcement, improved and ring-fenced residential parking and a commitment to community sustainability.

We are deeply disappointed to see (under 3. of the TCAAP) the throwaway reference to residential being an appropriate use in the town centre 'in principle'. The lack of interest in residential suggests that planners just 'don't get it' when it comes to community sustainability and effective 'urban village' management and we hope and expect that this neglect of *existing* residential electors is revised in the next iteration of the Plan.

The error almost certainly arises from an ideology of planning where the Town Centre is falsely described as starting 'where the character changes from being of a primarily commercial to a primarily residential nature'. From this simple mental rigidity arises an inability to see the key residential areas in the Town Centre as integral to it and as adding fundamental value to sustainability, retail, tourism and cultural integrity.

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