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Tunbridge Wells Borough Council - Core Strategy – “PREFERRED OPTION REPORT” (Consultation 30.11.07 – 11.01.08) 7 January 2008

What is the Core Strategy? (p. 3)

1.9 The Core Strategy: Issues & Options Report explained the structure of the LDF system and so this is not repeated here. It is, however, very important to clarify that the Core Strategy, whilst central to the LDF, will not by itself replace the Local Plan. Nor will it consider so many issues in such depth. It will not, for example, allocate specific sites for development. Nor will it contain detailed policies for development control purposes. These matters will be covered by a Site Allocations Development Plan Document (DPD) and a Development Control Policies DPD respectively, as shown on the Borough Council's Local Development Scheme (LDS). The role of the Core Strategy is simply to establish the guiding principles and policy framework for these more detailed DPDs.

The all over guiding principles of The Core Strategy will have been set by the time the Site Allocations Development Plan Document and other DPDs are produced, and The CS may have ignored some of our input which is area related. Therefore there is a fear that we might not be capable of influencing these, important to us, more detailed plans.

Policy 1 – Development in Royal Tunbridge Wells and Southborough (p. 22)

The preferred approach for development in Royal Tunbridge Wells is to:

- Prioritise the comprehensive redevelopment of town centre and edge-of-centre sites for development for a range of uses, including residential; commercial; economic; leisure and; cultural
- Provide at least three quarters of the Borough's housing requirement over the Plan period, to include sufficient affordable housing to meet both unmet and future needs
- Maintain/increase the existing amount of employment floorspace whilst maintaining/increasing the proportion of B1 office space, principally in the town centre. Particular encouragement will be given to health sector businesses.
- Provide 23,403 sqm of new net comparison retail floorspace in the town centre by 2017, to include the planned expansion of Royal Victoria Place
- Contribute to an integrated approach to improve transport and movement into, and around, the town
- Strengthen the role of neighbourhood centres in providing services to local residents and a focus for community interaction
- Preserve the relationship between the landscape and townscape of Royal Tunbridge Wells to secure its special character in the long term

The preferred approach to development in Southborough is to:

- Maintain the town as a local centre of distinctive character, independent of Royal Tunbridge Wells
- Reinforce the function of Southborough as a local centre through a new mixed use development to provide retail, commercial and community facilities

The town centre being the major generator of income in the borough needs to become the showcase for the brand 'Royal Tunbridge Wells'.

Consideration has to be given to define a ratio of residential / commercial properties which should be adhered to.

- (1) In the town centre: Encourage the reversal of non-purpose built flats back into town houses or at least maisonettes. – Reasons: To reduce town cramming with all problems like parking, infrastructure and in view of the walking distances to local schools and amenities like the Common, Calverley Ground, Trinity Garden, families would add to a healthy mix.
- (4) Prior to encouraging more retail floor space in RTW - infrastructure, transport, parking strategies, general appearance of the town centre, and ways to make the town attractive 'to spend a day in RTW', have to be looked into.
- (7) - The trend that every front garden can be turned into a car parking space (therefore completely changing the street scene and townscape) has to be stopped (repetition of London's mistakes).
 - The maximum height of buildings has to be defined in order to preserve historic landmarks and vistas and to avoid detractors like Europa House, Church Road and AXA PPP, Crescent Road.

Policy 8 – Retail & Leisure (p. 38)

The preferred approach is to:

- Continue to focus new retail, leisure (including higher-order facilities) and other town centre uses on the centres in the Borough, of a scale that is in accordance with the retail hierarchy
- Allow viable development proposals where this would seek to meet the identified need for additional comparison (non-food) uses in the main urban area and the other town centres, and in other centres where this would contribute to their vitality and viability
- Resist any future out-of-town retailing that would adversely affect identified centres
- Not allow any further additional convenience (food) uses, other than in Southborough
- Resist, as far as practicable, the loss of community facilities, including retail, and to support the provision of such facilities where they are deficient
- Maintain and seek to improve the quality and accessibility of open space where appropriate

However, we support the replacement of Safeways/Morrisons (at the station) with a quality supermarket to cater for the town centre. The entire area around the station should look more inviting; cladding the car park / supermarket complex 'to a richer design' might be a visual solution.

- (8) Remove wording "*where appropriate*" – Who would define? '*maintain and seek to improve the quality and accessibility of open space*'.

Policy 9 – Employment Provision (p. 40)

The preferred approach is to:

- Maintain/increase the amount of employment floorspace across the Borough and specifically within Royal Tunbridge Wells
- Support applications that will improve the quality of employment opportunities
- Safeguard existing employment sites that are well located and otherwise well suited to employment use

- Former inner town residential properties, now offices, be re-converted into residential town houses (e.g. Belvedere Terrace, Church Road, or Clanricard Gardens or Lonsdale Gardens) and purpose built office buildings of quality (with underground car park) be supported.

- "Walking to your work place" should be a key factor for employment provision in RTW.

Policy 10 – Transport Infrastructure (p. 41)

The preferred approach to addressing transport issues and providing necessary infrastructure is to:

1. Make provision for maintaining and improving transport infrastructure at the strategic and local level through working with partners to:
 - Improve the strategic rail and highways network, including the A21, A26 and A228
 - Support junction and highway capacity improvements, including those which will benefit all road users
2. Encourage sustainable modes of transport including cycling, walking and use of public transport wherever possible to reduce dependence on the private car. This will be done through working with partners to:
 - Promote and plan for a park and ride facility to serve Royal Tunbridge Wells
 - Continue to develop and provide an integrated cycle network, enhance pedestrian routes and encourage improvements in public transport
 - Pursue improvements to transport links in the rural areas of the Borough and protect the rural lanes network to ensure that they remain convenient and safe for users
3. Continue to promote integrated travel planning methods with stakeholders
4. Manage demand for town centre car parking

- Make the town centre spine from Grosvenor Road to the Pantiles more pedestrian friendly and more attractive.
- Introduce smaller eco friendly buses and ban old polluting buses (old registrations).
- Abolish one-level surface car parks and create underground car parking (to use the space better) (e.g. Mt Pleasant Avenue, Rock Villa Road, Trinity House (& Trinity tarmaced churchyard), Little Mount Sion, Beech Street off Camden Road).
- The trend that every open space (with or without lawn) can be used as a car park has to be reversed; cars have to go underground.

7.88 Parking policy will continue to have a key role in the overall planning framework. Current parking policy is provided by the Kent and Medway Structure Plan and the Tunbridge Wells Borough Local Plan 2006.

On-street car parking policy will give priority to residents and customers wherever possible.

In terms of off-street car parking, many of the car parks across the Borough are close to capacity. It is, therefore, important to continue to protect such parking provision, but to also seek to encourage regular all-day visitors to Royal Tunbridge Wells to use other modes of transport.

- Remove "*and customers*" - Whose customers, customers of TWBC or do you mean shoppers ?
- Remove "*wherever possible*" - recent car parking surveys should have given directions on this.

Policy 12 – Re-use of Previously Developed Land and Buildings (p. 46)

The preferred approach is to:

- Meet development needs as far as possible through the re-use and redevelopment of previously developed land and buildings, in accordance with the overall spatial strategy and Policies CP7, CP8 and CP9. This will be achieved by identifying and allocating appropriate sites
- Make appropriate allowances for windfall sites to come forward for housing and employment uses

Green Belt as such should not be considered as sacred land as very often stretches of 'Green Belt' land have been left to deteriorate and are blighting the rural landscape. These stretches, the rural 'Grot Spots', having been tolerated by TWBC, could be as suitable for development as the windfall land, often resulting in urban garden grabbing.

Policy 13 – Natural Environment (p. 48)

The preferred approach is to:

- Consider rural landscapes and seek to protect or enhance landscape character within the Borough, including national landscape designations such as Areas of Outstanding Natural Beauty (AONB)
- Consider the urban landscape and townscape, seek to conserve, protect and enhance local landscape designations, such as Special Landscape Areas, Important Landscape Approaches, Areas of Landscape Importance and Areas of Important Open Space, where possible
- Minimise impacts on biodiversity and enhance it wherever possible. This will include seeking to protect, conserve and enhance biodiversity areas, including Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR), Local Wildlife Sites (LWS) and sites of Local Nature Conservation Value (SLNCV)
- Maintain, protect and, where possible, enhance, the historic natural landscape and those features which contribute to the distinctive character of the Borough's landscape, such as trees, woodlands, hedgerows and rural buildings

(2) Remove wording “*where possible*” – Who would decide? ‘ . . . *Areas of Landscape Importance and Areas of Important Open Space*’

Policy 14 – Historic Built Environment (p. 51)

The preferred approach is to:

- Preserve or enhance the special character and appearance of conservation areas and listed buildings and their settings
- Protect and, where possible, enhance key features such as historic parks and gardens, ancient monuments and areas of archaeological interest

(2) Remove wording “*where possible*” – The term is subjective regarding “*protect and enhance key features such as historic parks and gardens, ancient monuments and areas of archaeological interest.*”

Policy 16 – Design Quality (p. 55)

The preferred approach to contribute to meeting the challenges of future development is to:

- Achieve a greater sense of place across the Borough, by maintaining the distinctiveness of particular localities through more thoughtful regard to existing character, including density of existing and proposed development
- Improve the usability and function of buildings, spaces and places for all people who wish to use them, now and in the future, by observing the principles of good urban design
- Recognise the importance of quality in the public realm in creating attractive and functioning places

- The bullet points of the policy are too weak considering the well described “*Reasoned Justification*”.

(3) “. . . . *creating attractive and functioning places*” – add: make existing civic places more attractive and encourage greenery and floral displays.

- The future of design should emphasise on people and environment and NOT on cars!

March 2007 - Tunbridge Wells Borough Council – Core Strategy – 1st stage: “ISSUES AND OPTIONS REPORT”

http://www.telephonehouse.org.uk/neighbourhoods/ldf_qa-thna270307.pdf