Town Centre Area Action Plan and Allocations Development Plan Documents (101216/CAB010)

To: Cabinet
16 December 2010

Main Portfolio Area: Strategic Planning and Development Control

Author of report: John Spurling

Classification: Non-exempt

Ward: All Wards

Executive Summary

From June through to September 2010, the Council consulted people on the Town Centres Area Action Plan (TCAAP) and Allocations Development Plan Documents (DPDs). The purpose of the consultation was to give people an opportunity to provide their views on these planning policy documents that are being produced. In excess of 3,000 representations were received as part of the consultation.

The consultation material consisted of six consultation packs, which covered the following areas:

- Royal Tunbridge Wells
- Southborough
- Paddock Wood
- Cranbrook
- Hawkhurst
- Villages and Rural Areas

The Cabinet report identifies the main issues raised by respondents for these six geographical areas.

The report is provided for information only.

Corporate Priorities

Once the Town Centres Area Action Plan (TCAAP) and Allocations Development Plan Documents (DPDs) are complete, this is a key way in which the Council can deliver, or influence the delivery of, a number of its objectives, including for housing; the environment; and the economy and regeneration.

Report status

This report is for information only.

101216/CAB010
Report of Head of Planning Services Continued

Route to Implementation/Timetable:

This is a report for information only. The procedures and timescales for producing the Town Centres Area Action Plan DPD and Allocations DPD are set out in the separate report that relates to the timetable for producing the different Development Plan Documents. Cabinet/Council decisions will be required at key stages in the production of the planning policy documents.

Background

1. The Town Centres Area Action Plan (TCAAP) and Allocations Development Plan Documents (DPDs) are being prepared by the Borough Council. These documents are being prepared as part of the Local Development Framework (LDF).

2. The process for preparing DPDs is set out in primary legislation: in the Planning and Compulsory Purchase Act, 2004. This is supported by secondary legislation in the Town & Country Planning (Local Development) (England) Regulations, 2004 (as amended). This legislation remains in place.

3. The Regulations provide for interested parties to contribute to the process of DPD preparation at two main stages:
   - **Regulation 25 Public Participation:** this enables stakeholders to seek to actively influence the Plans prepared by the Council. The Council must demonstrate that representations made at this stage have been taken into account before it makes any final proposals for submission to the Government
   - **Regulation 28 Representations on a DPD:** this is not a consultation stage as such, but rather an opportunity for stakeholders to comment on the “soundness” of the Council’s final proposals. In effect, the Planning Inspector is the audience for representations made under Regulation 28, as opposed to the Council. The Council should not need to amend its proposals as a result of these representations because it should consider them to be “sound”

4. There will be further consultation on the TCAAP and Allocations DPDs under Regulation 25, which will take place during 2011, before these documents are submitted to the Secretary of State for examination.

5. Under Section 20(3) of the Planning & Compulsory Purchase Act 2004 (as amended) the Council must, at the time it submits the DPD to the Secretary of State for consideration, submit a statement, which will need to show:
   - a summary of the **main issues raised by representations** (my emphasis) made as part of Regulation 25 consultation and
   - how those main issues have been addressed in the DPD

6. From June through to September 2010, the Council carried out consultation on these documents under Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations, 2004 (as amended).

7. The purpose of this stage was to give people the opportunity to provide their views on these documents, which will allocate specific sites needed to meet housing or other land use needs.
8. The consultation material consisted of six consultation packs, which covered the following areas:
   - Royal Tunbridge Wells
   - Southborough
   - Paddock Wood
   - Cranbrook
   - Hawkhurst
   - Villages and Rural Areas

9. The consultation provided a wide range of information, which was tailored to each area:
   - A Vision and Detailed Objectives, including for the town centres where appropriate
   - A list of the area’s Development Needs, such as the number of net additional houses required
   - A Town Centre Boundary, where appropriate, which will define the area to be covered by the Area Action Plan
   - An analysis of the Key Issues affecting the Town Centres that the TCAAP will need to resolve
   - A series of Maps and Concept Diagrams, illustrating the key issues for the town centres
   - A map of the area’s Green Infrastructure Assets (e.g. open spaces, footpaths etc) to help to identify where there may be opportunities to improve connectivity or access
   - A Map of all Sites across the Borough, which have come to the attention of the Borough Council as possible sites to be considered for allocation. The map shows which sites the Borough Council considers warrant further consideration as part of the plan-making process, and which do not. A written rationale was provided
   - A Site List providing summary information about each site

10. At the end of each pack, there was a questionnaire tailored to the issues raised in the information pack.

11. More than 3,000 written responses were received as part of the consultation process. Officers are currently considering how to improve consultation methods.

12. Every consultation response has been considered and the main issues relating to each question have been identified by officers. This Cabinet Report provides an overview of these main issues for the six different geographical areas.

13. There were a large number of questions posed in the questionnaires, i.e. there were 27 questions relating to the Royal Tunbridge Wells consultation pack alone. There were also a large number of sites, i.e. 281 individual site references, on which people’s views were sought.

14. Due to the scale of the consultation, this Cabinet Report considers issues broadly by topic rather than by question and does not, for example, contain details of comments made about every site. This will have to be considered before the next stage of consultation as set out in the ‘Next Steps’ section of this report.
Main issues for Royal Tunbridge Wells

Housing: Differing views about whether new housing is needed, the percentage of affordable housing that should be sought and the type of dwellings required. Generally, people wanted to see more family housing.

Transport infrastructure: Concerns about congestion were raised. Measures to address transport included park and ride sites; a bypass; improving cycle path provision; more buses (particularly for school children); congestion charging; shuttle buses or a possible tram linking different parts of the town; one way streets, i.e. along the High Street; improving the pedestrian routes and improving bus services. Improvements to transport links at Longfield Road/North Farm, such as having roundabouts and dualling the A21, were mentioned.

Parking: There were mixed views about whether parking provision was adequate. The high cost of parking was mentioned, as well as charging on a Sunday. People were also concerned about the overspill of car parking onto residential streets.

Town Quarters: The consultation pack showed different town quarters, which describe the unique characteristics of the town, i.e. the Pantiles quarter. Generally people were supportive of the town quarters that had been identified, but some additions were suggested, such as including a Calverley Grounds quarter and also a cultural quarter representing features such as the museum, library and town hall. Some respondents were unsure about the business quarter shown as this included residential uses.

Employment: Most people considered that there was no need for additional office space, primarily due to the amount of vacant office space. Those respondents who were supportive of more office space suggested reusing existing redundant office space and using sites, including the former cinema site, Kent & Sussex Hospital and Land Registry sites (Hawkenbury) and the Town Hall site.

Retail: Most respondents considered that there was no need for additional non-food retail, particularly due to the level of under-utilised existing retail space. Some respondents favoured the need for specialist or independent stores and others considered that there was a need for a large department store such as Debenhams or John Lewis. It was generally considered that more cafes and restaurants were not required, but the need for an additional supermarket was referred to. Most respondents considered that further retail at Longfield Road/North Farm should be resisted.

Community facilities and leisure: Many respondents were keen to see a cinema, swimming pool and ice rink in the town centre. There was concern about the potential loss of existing cultural facilities such as the library, museum, adult education centre, art gallery and theatre.

Environment/Conservation: The need to preserve the character of Royal Tunbridge Wells was highlighted, with some respondents expressing a concern that the town would become more like Bluewater or Croydon.

Site-Specific Issues: The development of the Civic site (Site 178) generated many responses. Particular concerns were about the potential loss of existing civic and cultural facilities and the need for these to be retained/provided elsewhere and the preservation of the listed buildings.
General support that site 182/1003 (Greggs Wood/Sherwood) should be retained as ancient woodland and a Local Wildlife site and not developed.

The other main issue was the loss of parking provision if sites were developed. This included sites such as the Crescent Road car park (Site 120), as well as surface car parks including Beech Street car park (Site 145) and St John’s car park (Site 98).

**Main Issues for Southborough**

**Housing:** a few respondents were concerned about further housing in High Brooms. Often concerns about housing were due to the impact of additional traffic on the road network.

**Transport infrastructure:** Transport issues did dominate the responses received for Southborough. The postponement of the A21 dualling and impact on traffic in Southborough, particularly on the A26, were highlighted. The need for improved transport infrastructure was recognised and respondents generally considered that the road network couldn’t support further development and traffic generated. Possible solutions were suggested including park and ride, tramway, trolley buses, having the A26 as a red route, a bypass, having bus services to/from High Brooms station and Pembury hospital, bus lay-bys/widening and improved cycle paths.

Respondents were generally in favour of improving non-motorised links, such as improving cycling links to key destinations, i.e. schools via off road paths and to other settlements. Some respondents considered that equestrian use should be discouraged due to too much traffic. There were differing views about how to improve pedestrian and cycle access across London Road as although additional crossings were suggested, other people though this may worsen congestion on London Road.

**Employment Floorspace:** Generally respondents were unsure if there was a need for this, and would like to have seen unemployment statistics to make an informed choice. Respondents did state that any need would need to be justified.

**Community Facilities:** Respondents generally preferred to have additional community facilities rather than retail. It was considered that more community facilities were required, such as a community centre and relocated library, and generally people thought this could be located at the Southborough Hub. Facilities on the Ridgewaye site could be improved, such as a sports pavilion. Barnetts Wood was also mentioned as an area that needed improving, including the provision of children/youth play facilities.

**Retail:** The consultation pack referred to a new retail foodstore. Respondents generally didn’t think there was a need for this but some people did accept that development along the eastern edge of London Road was required.

**Environment/Conservation:** Respondents did not want any development on green locations in High Brooms. More allotment space was required. The impact of any development on the Area of Outstanding Natural Beauty (AONB) was mentioned.
Site-Specific Issues: The site generating the most interest was the Central Southborough Hub/137 London Road and surrounding area (Site 60/1015). A number of respondents stated that some of the reasons for refusing previous planning applications at the Southborough Hub still remained valid, such as the loss of recreational land, and therefore would need to be considered carefully. Many people were concerned about the impact of any new development on this site on residents, pedestrians and cyclists.

Respondents were concerned that Site 201 (Wheelers Field) was contaminated land so was not suitable to be allocated for play space. They also considered that Site 203 (Hythe Close) should not be redeveloped for housing.

Main Issues for Paddock Wood

Housing: Residents were concerned about the level of housing proposed for Paddock Wood (600 net additional dwellings from 2006-2026) and also where this would be accommodated.

Transport infrastructure: Congestion from Maidstone Road and the impact on the surrounding network was referred to, and respondents were concerned about the impact of increased development on the road network. Respondents wanted improvements to bus services, particularly to those to Tonbridge, Royal Tunbridge Wells, Maidstone and High Brooms but also within Paddock Wood and to rural destinations. Some respondents suggested a direct train link to Royal Tunbridge Wells and the need for a good train service to Gatwick and Ebbsfleet.

Parking: Respondents were concerned about the possible increase in demand for parking due to proposed developments. The station car park is at capacity and residents were concerned about the overspill of commuter parking into residential areas.

Retail: There is a requirement for more diverse retail and some people considered that there was insufficient supermarket provision.

Education: It was considered that there was a need for additional pre-schools, a need for an additional primary school as the existing site can’t support any further expansion and that the secondary school was at capacity. It was also felt that there was a need for higher education facilities.

Community facilities and leisure: Respondents wanted additional community and leisure facilities, such as a swimming pool, cinema, replacement library, history/heritage centre, community centre.

Flooding: Many respondents were concerned about the existing flooding problems that affect the town. Respondents were supportive of avoiding development where flooding occurs and that if development does occur, it must address the existing flooding situation.

Environment/Conservation: Respondents were concerned that new development would result in loss of countryside.

Site-Specific Issues: Respondents were concerned about the development of greenfield land, including woodland locations. Some of the comments made in relation to sites were more general concerns with development, i.e. the issue of school capacity was raised.
A number of respondents were concerned that Site 218 (Land at Church Farm) was unsuitable for development due to flooding risk, impact on wildlife, loss of recreational value and agricultural land and the poor road infrastructure.

Respondents considered that Site 219 (Land at Mascalls Farm) was not suitable for development as it is a greenfield site. The biodiversity implications of developing so close to Foalhurst Wood, particularly for dormice, was also referred to.

Site 1023 (Little Rhoden Farm) generated less interest, although concerns with developing this site included increased flooding and the impact on Paddock Wood’s setting.

**Main Issues for Cranbrook**

**Housing:** Respondents were concerned about the impact of additional housing on the countryside and queried the level of housing that had been allocated to Cranbrook.

**Transport Infrastructure:** People were concerned about the impact of additional development, specifically housing, on the road network and resulting increase in congestion. There were mixed views on whether pedestrian and cycling links needed improving, although various links such as between Angley School and the High Street were mentioned.

**Community facilities and leisure:** People considered that a new primary school was needed, a community centre and also improved leisure facilities such as a skate park.

**Parking:** Respondents were concerned that the existing free parking and adequate parking provision may be affected with future developments and that charging for parking may deter visitors/tourists and force parking onto neighbouring residential streets.

**Education:** Some respondents thought that Angley School was failing and that this could increase pressure on Cranbrook School. It was considered that an adult education centre could be provided to help support education as an attraction.

**Retail:** Most respondents thought there were sufficient restaurants and cafes in Cranbrook.

**Environment/Conservation:** The impact of additional development on the historic and rural nature of additional development was cited. Crane Valley Nature Reserve was recognised by some for its biodiversity interests whereas other people considered that the emphasis should be on enhancing facilities for young people. The majority of respondents were concerned about conservation of existing open space, rather than providing additional open space.

**Site-Specific Issues:** Many respondents were concerned about possible development of Site 10 (Rammell Field), with respondents citing protection of recreational and heritage value.

There were concerns about developing Site 9 (Scott Field) and the impact this might have on Cranbrook Windmill. Respondents were also concerned about the possible development of Site 13 (Land on the east side of Freight Lane) due to the sensitivity of the site.

There was resistance to the potential loss of Tanyard car park (Site 211).
Main Issues for Hawkhurst

Status of Hawkhurst: There were a large number of objections to Hawkhurst being classified as a small rural town and not a village. Respondents were not aware of the implications of Hawkhurst being designated as a small rural town in the Local Plan 2006.

Housing: Respondents were concerned about the amount of housing that was proposed for Hawkhurst, and that if housing was required then previously developed land (brownfield sites) should be considered rather than greenfield sites. This includes sites such as Babies Castle (Hawkhurst Castle), the Arriva bus depot, All Saints Church, Lillesden School and Springfield Nursery.

Transport infrastructure: There was concern about traffic congestion, particularly at the A229/A268 crossroads and the impact of future housing. In particular, the impact of heavy goods vehicles was cited. Solutions to improve traffic congestion included a by pass; altering the traffic light sequence and/or considering a mini roundabout; one way system; undertaking measures to reduce car usage. There was also concern about the lack of public transport and suggested solutions included more frequent bus services to destinations, including Royal Tunbridge Wells.

Retail: Most respondents thought that retail provision was currently adequate but suggestions for additional comparison (non-food) retailing included an ironmongers/hardware store. Generally people thought that there was no need for a further supermarket.

Community and leisure facilities: Most respondents thought that a new community facility should be located within Hawkhurst itself, such as at the former Arriva bus depot or All Saints Church. Many people were concerned about the impact of future development on GP provision, dentists and policing.

Environment/Conservation: There were mixed views about whether green space should be enhanced, but most people thought that additional open space was not required. These concerns seem to be because there is already good access to the countryside and people often associated open space provision with future housing development in the countryside.

Education: Respondents were concerned that the primary school at Hawkhurst was already at full capacity and that further development would exacerbate this situation.

Site-Specific Issues: Site 64 (Land at Fowlers Park) generated substantial opposition. People were concerned with the size of the site that might be allocated, the impact on the Area of Outstanding Natural Beauty (AONB), infrastructure concerns, loss of open space and the belief that sites which are previously developed land can provide sufficient housing numbers.

Main Issues for Villages and Rural Areas

Housing: Respondents considered that any further development should avoid greenfield sites and the Area of Outstanding Natural Beauty (AONB). There were mixed views about whether Benenden needs extra market housing or just affordable housing.
Transport infrastructure: The main challenge related to poor public transport and the need to enhance this, particularly bus provision, such as having a more frequent service and buses that ran later in the evening. Some people suggested that smaller buses should be provided to cope with small rural roads, and that this included having a mini bus service. There was overwhelming support to encourage walking and cycling, through widening pavements and having more pathway/cycle provision.

Economy/Retail: Respondents generally considered that the rural economy should be supported and developed. Particular suggestions focused on supporting local agriculture and increasing the sale and consumption of localised food. Improving the local village centres were generally supported, although some people were concerned that this might be interpreted as over development. Maintaining existing services, such as post offices, was referred to.

Environment/conservation: There were concerns about developing within the Area of Outstanding Natural Beauty. The River Teise was referred to as a particular location that could be enhanced. Enhancements and creating new greenways were suggested, including a routeway linking Bedgebury Forest to Bewl Water, upgrading footpaths to accommodate equestrians, upgrading Tunbridge Wells circular walk. Maintenance of existing public ways was also mentioned.

Site-Specific Issues: No one site was consistently referred to, although a number of respondents were concerned about the potential development of Site 64 (Land at Fowlers Park), that was referred to in the Hawkhurst consultation pack.

What happens next?

16. Before the Council undertakes the next stage of Regulation 25 Public Participation during 2011, officers will consider all of the issues raised during the consultation period (June to September 2010). This will include considering views that people have made about the different sites.

17. As part of the next Regulation 25 Consultation, the Council will need to show how the main issues raised during the 2010 consultation have been taken into account. Officers are also reviewing consultation methods to try to overcome concerns of respondents that they only became aware of the consultation via word of mouth rather than through publicity undertaken by the Council.

Timescales, Resources and Risks

Timescales

18. A separate report is being taken to the 16 December Cabinet meeting, which sets out timescales for the production of the Development Plan Documents. Subject to Cabinet agreement, the intention would be to undertake further consultation under Regulation 25, commencing in October 2011.

Resources

19. The large number of responses received and interest generated by the recent consultation has meant that progress on DPD preparation has been more time-consuming than anticipated. It is important that the main issues arising during consultation are accurately identified and taken into account in informing subsequent stages of DPD production.

Risks

20. By making the main issues publicly available at this stage of the process (rather than waiting until the next Regulation 25 consultation), this should demonstrate to interested parties that the Council have considered the issues raised during the recent consultation (June to September 2010).
Cross cutting issues

Legal
21. The Borough Council will follow procedural requirements for preparing the respective planning policy documents. Legal advice will be taken as necessary at appropriate stages.

Finance and other resources, including ICT
22. The TCAAP and Allocations DPDs are being prepared within an agreed LDF budget.

Staffing
23. The DPDs are being prepared primarily by officers in the Planning Policy Team who have also identified the main issues raised during the consultation. Contributions from other Services will be sought where necessary.

Value for money
24. The vast majority of work is being carried out in-house by Council Planning Officers. Where external resources are required, the Council’s procurement procedures are followed to ensure value for money is achieved.

Risk Management
25. A review of the timetables for producing the different planning policy documents will include a full risk assessment.

Equalities
26. An Equalities Impact Assessment will need to be completed for the TCAAP and Allocations DPDs.

Safer & Stronger Communities
27. The TCAAP and Allocations DPDs will be subject to sustainability appraisal which will make an assessment of how its policies perform against objectives such as this.

Health and Wellbeing
28. The TCAAP and Allocations DPDs will be subject to sustainability appraisal which will make an assessment of how its policies perform against objectives such as this.

Environment / Sustainability
29. The TCAAP and Allocations DPDs will be subject to sustainability appraisal which will make an assessment of how its policies perform against objectives such as this.

Human Rights Act
30. Not specifically relevant.

Communication and Consultation
31. Local Development Framework Members Working Party has been made aware of the main issues presented in this report.

Recommendations:
1. That Cabinet notes the report.
Reason for recommendations:

To make people aware of the main issues raised during consultation.

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Background papers: none
Appendices: none