

**Civic Development Planning Framework SPD**  
**Consultation 30 October to 11 December 2017**  
**Consultation Response Report**

Comment Number	Name/ Organisation	Question 1 - comments on the Vision and Objectives	Question 2 - comments on the Key Principles	Question 3 - comments on the proposed urban framework and public realm framework	Question 4 - comments on the key sites	Question 5 - any other comments on the consultation draft Supplementary Planning Document:	TWBC Response	TWBC Recommendation, including further revisions where considered appropriate.
<a href="#">CDPF 1</a>	Chris Parker					<p>A key concern I have is the avoidance of social/affordable housing contribution by large developers.</p> <p>Is this within scope?</p> <p>If not How can? When will? This issue be addressed</p>	<p>It is not an objective of the document to provide policy or guidance on the provision of affordable housing within any development scheme that may come forward.</p> <p>Affordable housing considerations are dealt with by policy within the existing adopted Core Strategy 2010 and the specific Affordable Housing SPD.</p>	No change to draft document.
<a href="#">CDPF 2</a>	S Sheldrake					<p>I have skipped through the consultation-- I disagree that there are few entrances to the Calverley Grounds and that pedestrians don't use it-- or indeed walk anywhere in T wells</p> <p>I am against any plans for a new theatre.</p>	Comments noted.	No change to draft document.
<a href="#">CDPF 3</a>	John & Ann Pickering					<p>1 .Could you please advise if the plans for a new theatre and civic buildings include confirmation that there exists adequate access for all types of vehicles needed to service the new civic offices and theatre.</p> <p>2. Also is there already outline planning permission for these new offices and theatre where adequate vehicular access is confirmed?</p> <p>3. That hitherto these new buildings have not been included in the TW plan.</p> <p>4. That the so called stage three drawings for the new civic buildings due to be presented for approval in Nov / Dec will confirm that adequate vehicular access will be demonstrated.</p>	<p>The response is not directly related to the purposes of the draft document, its structure, form and content.</p> <p>Any planning applications that may be submitted for proposed development on any of the sites included in the SPD will need to demonstrate that the relevant development can be satisfactorily accessed and serviced.</p> <p>No planning permissions have been granted in regard to any current development proposals affected these sites.</p> <p>The draft SPD sets out the current policy position in regard to the sites the subject of the document.</p>	No change to draft document.
<a href="#">CDPF 4</a>	Richard Cattermole	These objectives are all quite valid but you do not make the	You want the existing town hall to be retained and enhanced which are	You mention reducing traffic congestion in the town centre. Then	You mention all the possible uses of the existing building after it	When the existing town hall was built the council had many more employees than it does now. It is reasonable to	<p>Comments noted.</p> <p>The draft SPD sets out the</p>	No change to draft document.

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		case for satisfying them by constructing a new civic centre in Calverley Park. Why can't they be met by modifying the existing Town Hall? The façades of the town hall and theatre could be kept and a new building constructed behind them. We have seen how long it has taken to find a new use for the old cinema site in Mount Pleasant Rd and I fear it could take just as long to find new uses for an empty town hall on Mount Pleasant Road.	worthy aims. Why can't this be done by constructing a new town hall & theatre on the existing site?  The town hall is a listed building and a landmark building in the centre of the town and, in my view, it should remain as the town hall. The same applies to the theatre. The current theatre site is far better than the proposed site in Calverley Park. The busiest part of the town during the week is around 18.00 – 19.00 is the station, very close to Calverley Park, and the theatre-goers will be arriving at exactly the same time. This puts too much traffic and pedestrian journeys in the same part of town at the same time. The existing theatre site is much better from this point of view. There are no other attractions in this part of town and there is a multi-storey car-park next door.	you mention the coaches that will be arriving carrying theatre-goers and this to a point right next to the busy train station. Traffic density will be quite severe. This traffic can more easily be accommodated on Crescent Road at the existing site.	ceases to be a town hall but if it can be adapted to all of these purposes it can certainly be adapted to being a town hall. It contains more space that the town council needs for a town hall so the surplus can be used for an enlarged theatre, theatre foyer and office accommodation, which is badly needed in the town, I understand.  Also, an enhanced town hall would obviate the need for the separate Gateway shop near RVP, with the resultant saving in rental payments.	assume that this trend will continue in the future so do we really need a new town hall in this new civic centre? It is not so long ago that Councillor Bullock was proposing to move the town hall out of Tunbridge Wells town centre and Hawkenbury came close to being the chosen site.  All things considered, the council have not made a good case for moving out of the existing building. The town hall and theatre should be re-developed on the existing site.	current policy position in regard to the sites the subject of the document. This includes policy considerations regarding the future use of the existing Town Hall complex.  It is not the role or purpose of the draft SPD to set new land use policy. As stated in the document itself the draft SPD has been prepared to supplement existing planning policies and guidance. The intention is that this additional guidance will help shape and influence future development proposals that come forward.  The comments are generally directed to the Civic Project proposals themselves and the possible impacts of such a development.	
<a href="#">CDPF 5</a>	Muriel Wilson					I am against TWBC's proposal to spend millions building a new theatre complex in Tunbridge Wells as it will be of limited value to a large number of residents within the Borough.  If the Borough Council has the funds needed, or if they intend to borrow it, it is on the back of Council Tax received from residents many of whom will gain no benefit from the prestigious facility being considered.  Before cramming the centre of Hawkhurst with new development and	The response is not directly related to the purposes of the draft document, its structure, form and content.	No change to draft document.

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						<p>the attendant traffic, I urge the Borough Council to support the Parish Council's efforts and return, without penalty of interest payments, enough of Hawkhurst's contribution to facilitate <u>our</u> Council's work to identify and purchase a suitable site for all-day parking for those who now work here.</p> <p>We ask TWBC: Please improve the lives of those already resident in the borough and give equal consideration before adding to your coffers with greater stress on infrastructure.</p> <p>Thanking you for your sympathetic response and fair judgement.</p>		
<a href="#">CDPF 6</a>	Dr Philip Drew	The overall vision promises to improve the town. It is perhaps disappointing that there is no dynamic transport vision to support the further development of the centre of town - how is congestion (increasing congestion?) to be managed under this vision. Ought some creativity be applied to this also? Park and ride? Some more creative/collaborative approaches to rail?	Refer to previous answer. Does not sustainability require a clear and creative transport strategy?	Supportive of the ambition to create the new theatre and office space is needed. Still concerned the plans for the existing Town Hall and Assembly Rooms appear uncertain. Surely there needs to be a short term strategy to use these buildings once the new Civic Centre is open should a suitable permanent use be difficult? We surely can't have another 20 years with half the town centre derelict?	<p>See comment above about existing Town Hall. If the building is no use to the Council why would it be of use to anyone else given its layout and condition and its listed status?</p> <p>Supportive of proposed new public spaces outside the existing library and new theatre and office space.</p> <p>Do the plans for Crescent Road lack ambition. Shouldn't a more confident and/or more radical approach be considered. This is one of the town's least attractive places and a main entry to the town from Pembury Road?</p>	<p>As noted above, the transport strategy seems a bit fuzzy. Shouldn't bolder solutions be considered especially those which encourage out of town parking.</p> <p>Wouldn't it be good to get on with something? We seem to have been talking about the town centre for 20 years - hopefully wont be another 20 years before some progress is made? Other towns don't seem to take this long?</p>	<p>Comments noted.</p> <p>The draft SPD sets out the current policy position in regard to the sites the subject of the document. This includes policy considerations regarding the future use of the existing Town Hall complex.</p> <p>It is not the role or purpose of the draft SPD to set new land use or transportation policy.</p> <p>Any planning applications that may be submitted for proposed development on any of the sites included in the SPD will need to demonstrate that the relevant development can be satisfactorily accessed / serviced and that there is no unacceptable impact on the highway network.</p>	No change to draft document.
<a href="#">CDPF 7</a>	Susan Reddy	I do not agree with your vision. Your objectives as a council should be to	You state you want the existing town hall to be retained and enhanced which is absolutely	The new site you are planning has poor access, and it would be impossible to bring	If the existing buildings can so easily be adapted to other uses, they can certainly be adapted for	This is a vanity project, which is a waste of the council funds and is not necessary.	The comments are generally directed to the Civic Project proposals themselves and the possible impacts of such a	No change to draft document.

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		<p>use the resident's money wisely and not spend it on vanity projects.</p> <p>The current buildings are listed and should be refurbished. This could be achieved easily and successfully at a much lower cost.</p> <p>We currently have a shortage of school places going forward, almost no affordable housing and you are cutting local services.</p>	necessary. You can do this very satisfactorily by refurbishing our much loved current listed council buildings and theatre.	<p>coaches and larger vehicles in.</p> <p>The current theatre site has plenty of parking for lorry's bring stage props etc. and coaches to the side, tucked away from the existing roads.</p>	the council and its offices. The theatre can also be refurbished and all of this would save huge sums of money.	<p>The current buildings can be refurbished and this will save large sums of money which then be used for investment that is absolutely necessary i.e more school places, affordable homes and good local services.</p>	<p>development.</p> <p>Comments noted.</p>	
<a href="#">CDPF 8</a>	Environment Agency					<p>Thank you for consulting us on the Civic Development Planning Framework SPD. Having reviewed this document we have no concerns.</p> <p>Please do not hesitate to contact me if you have any questions.</p>	Noted	No change to draft document.
<a href="#">CDPF 9</a>	Roger FitzPatrick					<ul style="list-style-type: none"> <li>All investments in car parking in the planning framework should be subject to the requirement that they be convertible to alternate use such as office: to include headroom provision, provision for installing services, and provision for people movement such as exits, staircases and/or elevators. (Within 15 years private car ownership stats will show a precipitous decrease. Planning now for car parking is analogous to investing in canals after the railways). Correspondingly any capital budget for car parking such as associated with this framework should be debarred from citing a pay back period based on car use in excess of 15 years.</li> </ul>	<p>The comment relates to future policy regarding car parking in Royal Tunbridge Wells which falls outside the scope of the draft SPD document.</p> <p>Noted as a general comment.</p>	No change to draft document.

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						<ul style="list-style-type: none"> <li>The civic centre should be in the town hall. Arguments that the town hall is unsuitable for the Councils own offices but after refurbishment will be suitable for other people's offices are specious.</li> </ul>	<p>The comment expresses a view as regards the location of the Borough Councils offices.</p> <p>Noted as a comment.</p>	No change to draft document.
<a href="#">CDPF 10</a>	Jones	Refurbish the Town Hall and Assembly Hall at less cost to taxpayers.	Leave park as it is. Traffic bad enough around station. Having Assembly Hall at top of town means parking in Calverly car park rather than more traffic coming down to bottom of town. Assembly Hall is a great building. More should be made of this. Bar has been refurbished and is great. Need to offer more services in this building so more people use. What about a new cafe in there?	How have the options been tested? The residents have not tested them. The council should not be spending more money on this than necessary. Improve what we already have.	There must be imaginative ways of developing what is there already at much less cost.	<p>I think the council should not go ahead with this project.</p> <p>Improve the existing Calverly grounds with a new cafe, bandstand etc.</p> <p>Redevelop the Town Hall and Assembly Hall at much less cost.</p>	<p>Noted as comments.</p> <p>The comments are generally directed to the Civic Project proposals themselves and the possible impacts of such a development.</p>	No change to draft document.
<a href="#">CDPF 11</a>	Natural England					<p>Thank you for your consultation on the above dated 1 November 2017, which was received by Natural England on 1 November 2017.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.</p> <p><b>Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our</b></p>	<p>Noted.</p> <p>The specific requirements for a Strategic Environmental Assessment or a Habitats Regulation Assessment having regard to any development proposals that are brought forward will be commented upon in the SPD document.</p>	<p>Changes made to draft SPD</p> <p>Revise draft document to include reference to SA and HRA requirements.</p> <p>Add to 1.1 Introduction Page 5</p> <p><b>“Any development proposals coming forward on sites the subject of this SPD must be subject to both a Strategic Environmental Assessment and a Habitats Regulations Assessment.”</b></p>



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						<p><b>interests to any significant extent. We therefore do not wish to comment.</b></p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p> <p><b>Strategic Environmental Assessment/Habitats Regulations Assessment</b></p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance <a href="#">here</a>. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p>		
<a href="#">CDPF 12</a>	Patricia Stone					<p>I am a disabled resident of Tunbridge Wells. As things are at the moment, I cannot get my scooter into the 2-way lift in the library to access the Art Gallery. Neither can I get it in the lift to access the Access for the Disabled meetings. Without help I cannot get through the Fire Doors in the corridors either.</p> <p>I studied the Architects' impression of how the building will be with the Entrance in Monson Road. It would appear that is a wonderful way of using such a marvellous building and it would be accessible for the disabled I know full well all that would cost a lot of money as the building has been allowed to 'rot' almost through the years. Even so, as costly as that might be it would be as nothing compared</p>	<p>Comments noted regarding the need to ensure that any development proposals that come forward are fully accessible to all.</p> <p>Revised / additional wording to draft SPD considered.</p>	<p>Changes made to draft SPD in regard to requirement that development proposals accord with access legislation requirements and provide for inclusive access and use.</p> <p><b>See detailed text below. Add at 1.3 Planning Policy Context Page 13.</b></p>

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						<p>with the suggested totally new Town Hall to be built into Calverly Grounds at the cost of £9 million ! That figure bound to rise if and when it comes to that. The present Town Hall would be left to rot and we'll be left with another rotting eyesore in the very Centre of the town.</p> <p>I am in full favour of retaining the updated building in Town and am totally against a new one being built further down the hill.</p>	Comments on Civic project proposals noted.	
<a href="#">CDPF 13</a>	Kent County Council Flood and Water Management					<p>Thank you for your consultation on the above referenced planning application.</p> <p>Kent County Council appreciates that a new design framework within the central area of Tunbridge Wells can shape development into the future.</p> <p>The Council has identified "a Sustainable Future" as one important principle for the study area but have defined this only in the context of carbon footprint and self-sufficiency.</p> <p>We would recommend that the Council expand the definition of "sustainability" to include the resilience of the local infrastructure. The town centre has experienced major flooding in recent years. The entirety of the study area, excepting Calverly Gardens is paved or roadway. Much can be done as new development comes forward to reduce surface water loadings on the combined sewer system within the city centre.</p> <p>The design principles within the public realm must consider how surface water can be managed to reduce peak flows to the sewer system. We would encourage the Council to consider other local authorities who have pursued innovative and exciting</p>	<p>Comments noted in relation to possible flooding avoidance / mitigation.</p> <p>Revised / additional wording to draft SPD considered.</p>	<p>Changes made to draft SPD</p> <p>Add at 1.3 Planning Policy Context Page 13</p> <p><b>“Designs for any development proposals that come forward must demonstrate how consideration has been given to the management of surface water to reduce peak flows and water loadings to the sewer system in the town centre.”</b></p>

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						<p>solutions to give greater benefits to the community beyond pedestrian spaces.</p> <p>This response has been provided using the best knowledge and information submitted as part of the planning application at the time of responding and is reliant on the accuracy of that information.</p>		
<a href="#">CDPF 14</a>	Mr M Coggles The Access Group	The Vision is inspiring but very broad brush and is lacking in detail, likewise the Objectives to retain, protect and enhance existing historic buildings is excellent, as is the intention to retain the existing buildings layout, however, there are contradictions surrounding the new civic centre and the theatre designs which do not fit with existing buildings.	<p>The Key Principals both are short on detail, for example:</p> <ol style="list-style-type: none"> <li>1. The existing civic and theatre complex are seen by disabled people as easily accessible, whereas placing them at the bottom of Mount Pleasant would cause access problems for some, due to the steep hill at Mount Pleasant. Attending an evening performance at the new theatre without available public transport or totally accessible taxis, as required by Article 9 UNCRDP &amp; DfT/DRC guidance document issued in 1996 defining a public transport vehicle which had to be independently accessible to all by the end of 2017.</li> <li>2. Access to the proposed new civic centre and</li> </ol>	<p>Dealing with Section 3.2 The Public Realm:</p> <p>There is, for my members, a clear lack of detail, which is what we and the public and interest groups crave.</p> <p>The townscape:</p> <p>This must comply with Article 9 UNCRDP, all footways must have clear unobstructed passage, with tactile delineators, guide paths and dropped kerbs or raised bridges at all road crossing points, in accordance with the requirements of DfT "Inclusive Mobility" and the DfT "Guidance on Tactile Paving Surfaces" and the current consultation on the DfT Disability Action Plan, which closed on 15 November 2017. Signage must be visual, tactile and in pictogram format. The café culture can only be permitted as long as there is 2 metres of clear unobstructed footway and the areas set aside for chairs</p>	<p>SECTIONS:</p> <p>4.1 TOWN HALL &amp; ASSEMBLY HALL</p> <p>Further to our previous comments the Group after discussion took the view that turning the Town Hall building into a Hotel complex and the Assembly Hall into a Conference Centre would not only provide a new funding stream for the council, but would attract new trade and business to the town.</p> <p>4.2 CULTURAL &amp; LEARNING HUB</p> <p>The Group has long supported and campaigned for this. Our only real concern is the introduction of the Gateway within the said project, we feel that it may deter tourists and others. We suggest it forms part of the Civic Centre.</p> <p>4.3 POLICY &amp; MAGISTRATES COURT BUILDINGS:</p> <p>The Group felt that this building could form part of a hotel complex with a</p>	<p>Having attended the drop in session on the 15th and explained to the members what was required in this response, there were many concerns expressed and a request for me to include them within the formal response from the Group, even though there was an acceptance that in general the document was designed to inspire and in very general terms set out what the council would like to achieve.</p> <p>Please find enclosed the detailed response from the Group, setting out their several concerns. My members have instructed me to say that whilst they do not wish to appear totally negative towards this document, which they consider was designed to inspire and is rather short on detail. They do have very serious concerns which I have been instructed to detail, which both the council and its developers must understand, fully accept and comply with the following legal duties and requirements set out below, irrespective of the additional cost.</p> <p>Our principal remit on planning and redevelopment, with just 8 years left to meeting total compliance with Articles 9, 19 &amp; 28 UN Convention on the Rights of Disabled People (UNCRDP) adopted by the UK in 2000 and formerly ratified in 2009; resulting in the legally binding UK Disability Strategy 2012 &amp; Action Plan (UKDS): the Equality Act 2010 (EA) and the Equality Standards in Local Government Targets 2000 (ESLG) which required at</p>	<p>Comments noted regarding a lack of detail in the document.</p> <p>As stated in the document itself the draft SPD has been prepared to supplement existing planning policies and guidance. The intention is that this additional guidance will help shape and influence future development proposals that come forward.</p> <p>It is not the intended purpose of the document to provide more detailed design guidance.</p> <p>Where the comments relate to the Civic project proposals the comments have been forward to the project team for consideration.</p> <p>Revised / additional wording to draft SPD considered regarding legal requirements associated with access and equalities.</p>	<p>Changes made to draft SPD</p> <p>Add at 1.3 Planning Policy Context Page 13</p> <p><b>“Development proposals that come forward for any site to which this SPD is applicable must comply with The United Nations Convention on the Rights of Disabled People, particularly:</b></p> <p><b>Article 9 - the right to independent access</b></p> <p><b>Article 19 - the right to independent living</b></p> <p><b>Article 28 – the right to disability accessible housing</b></p> <p><b>This will assist in encouraging developments to be inclusive and accessible to all.</b></p> <p><b>Developments must also meet Core Policy 5: Sustainable Design and Construction of the 2010 Core Strategy which states that:</b></p> <p><b>“Developments will also be of high-quality design, which will: Create safe, accessible, legible and</b></p>



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			<p>theatre complex will require the widening of all existing access road, which has not been considered in any detail, it would affect some of the protected historic buildings which would need to be demolished if it is to provide:</p> <p>* Set down and pick up areas for coaches and private cars collecting people from the proposed theatre. This may also interfere with the working of business and civic activity, especially for matinee performances. In London this is a major problem as coaches line up to pick up passengers after a performance, it does cause major traffic congestion, unless, like the Barbican Centre special coach pick up areas are constructed (that will add to the cost, as it did for the Corporation of London)</p> <p>3. The vast majority of audiences attending the proposed theatre will come from</p>	<p>and tables are properly cordoned off and duly licensed by KCC or TWBC.</p> <p>Street Lighting:</p> <p>Should be affixed to buildings within the town centre rather than free standing to allow for more footway space.</p> <p>Night Time Economy:</p> <p>If this is to thrive, then there is a need to have public transport running until well after midnight to all parts of the town and connecting with villages and towns within the wider Tunbridge Wells area. Only then will the council reduce car dependency. Appendix "B" indicates an alternative type of public transport service that could be provided and part funded by the Council, especially for the more rural areas of Tunbridge Wells.</p> <p>Civic Way:</p> <p>Currently there are a number of disabled parking bays, which would need to remain if disabled people are to access the Cultural and Learning Hub. There removal would be seen as de facto</p>	<p>connecting covered bridge between both buildings.</p> <p>4.4 9 to 10 CALVERY TERRACE:</p> <p>The Group supports the proposals with one condition, that a "free standing" lift be constructed to the rear of the building to permit full access for all (Kew Place a Grade 1 Listed Building being an example of the provision of lift access)</p> <p>4.5 CRESCENT ROAD</p> <p>The Group supports these proposals.</p> <p>SECTIONS 4.6 &amp; 4.7</p> <p>The Group would like more detail and information.</p>	<p>the lowest level of compliance, "adoption and full compliance with UNCRDP" and according to the Cabinet Office remains a "legal requirement" to ensure that all policies, practices, procedures and service provision of Tunbridge Wells Borough Council is totally compliant with the above legal requirements.</p> <p>We have already ensured that within the LDP there is a clear legal requirement and duty that:</p> <p>"Developers must have due regard for Articles 9, 19 &amp; 28 of the UN Convention on the Rights of Disabled People and the UK Disability Strategy 2012 &amp; Action Plan, with particular reference to Part 6, to ensure that all new build and refurbished buildings, dwellings and workplaces are independently accessible to all"</p> <p>We expected to see in this document a similar clear statement of intent, Campaigning for the Rights of all Disabled People, but that is missing. In its final version should contain this statement together with an intention to comply fully with "Inclusive Mobility" in order to be legally compliant.</p> <p>Notes:</p> <p>(a) According to the Cabinet Office since ratification of UNCRDP in 2009, "all new build and refurbished buildings, dwellings and workplaces must have complied and this should have been enforced by all Local Planning Authorities, otherwise they are derelict in their duty".</p> <p>(b) Since the introduction of the legally binding ESG in 2000, there has been a clear and long held "assumption" by all government administrations that local authorities were compliant and that by 2025 total compliance with all</p>		<p><b><i>adaptable environments."</i></b></p> <p><b>The supporting text of the Core Strategy adds that:</b>  <b><i>"Sustainable design should seek to ensure that developments are inclusive, accessible and adaptable in terms of their use by all people, now and in the future."</i></b></p>

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			<p>outside the immediate Tunbridge Wells area, from as far afield as East Sussex, Surrey and all parts of Kent. On site car parking will have to accommodate a minimum of 600 cars of which 10% or 60 spaces will be set aside for disabled and mobility impaired people (in a separate survey undertaken by the Group we were told by those surveyed that:</p> <p>* car parking must be provided at the theatre complex, audiences should not be expected to walk any distance. Failure to provide such on-site car parking will be a disincentive for the wider community to attend what is and will remain a rural theatre.</p> <p>4. Comments in this document regarding productions being as good as London are incorrect, touring companies have separate sets which travel and can be easily broken down. For example the</p>	<p>exclusion and discrimination.</p> <p>If the Town Hall building were to have a change of use, there would need to be independent access not only to the building, but also via Civic Way and there would be a requirement to provide disabled parking, otherwise the council and developers would be guilty of exclusion and discrimination by virtue of UNCRDP, UKDS &amp; EA. Turning the existing Town Hall into a hotel would be sensible and the Assembly Rooms into a Conference Centre, that would provide the council with a new funding stream post the loss of the Central Government Grant.</p> <p>Monson Way:</p> <p>The Group support the proposals.</p> <p>Crescent Road:</p> <p>The Group support the proposals as set out, but expect the cycle trace to be in the carriageway, not on the footway, unless it is constructed as a level difference track to provide safety for the cyclist, pedestrian and the motorist. The concept of "shared</p>		<p>the articles of the UNCRDP would have been achieved to avoid any sanctions being imposed by the UN. Many government policies are based upon that long held assumption. Both KCC and TWBC issued in 2001 its Disability Strategy, mirroring the requirements of the UNCRDP. In any court action they would be held "fully liable" if they had failed to comply.</p> <p>(c) The term "independently accessible to all" includes wheelchairs and small mobility scooters (see the 5 key definitions of UNCRDP in Appendix "A" to this document). The articles of the UNCRDP are to quote both the Cabinet Office and the DfLG&amp;C "non negotiable and must be complied with by 2025 or sooner if resources permit".</p> <p>(d) Where listed buildings are involved the use of "free standing adaptations", such as lifts are now permissible as a direct result of landmark court cases brought by the Equality &amp; Human Rights Commission (see Kew Palace a Grade 1 listed building as an example &amp; Bishop's Place, Bromley, Kent)</p> <p>(e) The updated Department for Transport "Inclusive Mobility" is to be incorporated within Part M of the Building Regulations to ensure total compliance by developers and local planning authorities.</p> <p>The recent damning report by the UN Commission for Human Rights Disability Team (UNCHRDT), supported by the UK Equality &amp; Human Rights Commission. The National Disability Cuts Watch Team and other Disability Organisations, including this Group, provided credible evidence to the UNCHRDT will ensure that failure to meet total compliance by due date will result in the UN Commission seeking sanctions on all imports and exports resulting in some 42 million</p>		

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			<p>current Harry Potter musical has special effects that will only be available in London, as does other London productions hence the draw to London will remain.</p> <p>5. At 1030 hrs when performances end, there will be no buses, unless the council is prepared to fund them, only taxis and a reduced train service. Noting the current times of the last connecting trains at Tonbridge, the council would need to seek assurances from South Eastern that late running services would not be cut, especially at weekends, when Network Rail undertake their programme of works. There would be cost implications for the council in delaying start times for Network Rail this has to be factored into any development programme</p> <p>6. The proposed office buildings within the new civic complex would require their</p>	<p>space" is far too dangerous and since recent court cases seen as unlawful.</p> <p>Calverley Grounds:</p> <p>The proposed office, civic suite and theatre should have been designed to meld with existing buildings, whereas it is a very modern complex. The road access will need to be widened and that will inevitably result in the demolition of surrounding buildings (see comments in Q2).</p> <p>Mount Pleasant Road:</p> <p>Members are concerned by the comments regarding the rationalisation of bus, taxi ranks and the pedestrian realm. We do not want a shared space on this hill that would be seen as far too dangerous, especially when cyclists are introduced into the mix. The Group oppose any such suggestion.</p> <p>Pedestrian Realm:</p> <p>The Group are keen to see that no cyclists use footways, they must be segregated into the road, especially if both the north south routes and east west routes are made 20 mph.</p>		<p>workers being laid off or losing their jobs; at a time when the UK will be adjusting its economic policies post Brexit, would be a disaster and is to be avoided by meeting that compliance, irrespective of the cost.</p> <p>Hence I have been instructed to require from the Council, in writing, a letter accepting, irrespective of the cost that total compliance will be met.</p> <p>Turning now to the questions:</p> <p>[TWBC: see responses entered into Questions 1 to 4].</p> <p>Apart from the concerns set out in detail above I am instructed to say that the Goups supports the document.</p>		

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			<p>own car parking spaces, separate from the civic car parking. The initial 250 spaces (25 would be for disabled parking), is frankly insufficient, plus the additional 600 for the theatre and its staff and actors.</p> <p>Within this section there is no mention of security of the exterior or interior of both buildings.</p> <p>Exterior:</p> <p>Bollards, planters, seats, trees etc to prevent ramming</p> <p>Interior:</p> <p>Theatre Complex:</p> <p>Car parking for staff and actors will need to be segregated from public areas and subject to camera cover.</p> <p>Performing staff do have concerns over personal security according to Equity, especially in rural theatres. The stage door entrance from the car park will need to have protected security.</p> <p>Scenery Docks will need to be covered by security cameras.</p> <p>Likewise the auditorium will need to have security</p>	<p>Footways must be for the pedestrian! Indications within the recent Disability Access Plan Consultation by the DfT take this into account and will inevitably result in a change of policy with regard to Shared Space and Cycle Tracks etc.</p> <p>In addition all footways must have dropped kerbs or raised bridges with appropriate tactile delineators and guide paths. Signage must be visual, tactile and in pictogram formats. Footways must have all street clutter removed to allow a 2 metre clear unobstructed passage. All chairs and tables must be in enclosed space and duly licensed either by KCC or TWBC and licence prominently displayed. There must be no encroachment of chairs, tables or other street clutter into the 2 metre zone.</p> <p>Cyclists:</p> <p>They are a danger to many groups of elderly, as well as visually and hearing impaired people, for that reason, as well as Article 8 Human Rights Act 1998, Articles 9 &amp; 19 UNCRDP and the</p>				



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			<p>cameras.</p> <p>Fire Exits:</p> <p>These will need to have doors that automatically open outwards and there must be no steps, only ramps with handrails. These areas should also be monitored by security cameras.</p> <p>Civic Centre Building:</p> <p>Having looked at the Sevenoaks District Council Building which is shared with police and others the concept including business areas does make sense and my members have accepted the existing Town Hall building is no long fit for purpose in the light of the reduced staffing and the proposals make realistic sense. Members felt that the Gateway should be included within this building, rather than in the Cultural and Learning Hub Project.</p>	<p>UKDS 2012, hence they must comply with the Cycle Tracks Act 1984. Policies by councils' encouraging "shared use" has been deemed "unlawful" in recent court cases. Likewise, the failure to maintain cycle tracks renders them illegal and the authority liable for any accidents that occur.</p> <p>We need to ensure that the proposed link with Calverley Grounds is a segregated level difference cycle track. Remember since the 1996 ruling by the then Transport Minster that "unsegregated shared facilities can only be used to connect one segregated cycle track with another and must not exceed 100 yards". Likewise, within the park cyclist must be restricted to set segregated cycle routes to avoid accidents with children playing in the park and other pedestrians walking within the park.</p> <p>Vehicular Movement:</p> <p>There will need to be dropping off points outside the new theatre for disabled and elderly people over what is regarded as a shared space</p>				

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				<p>outside both the civic suite and the theatre, unless the new car park is designed with wheelchair accessible lifts to both the business/civic suite and the theatre.</p> <p>There is no mention in this document of coaches picking up and setting down people attending performances at the theatre. As stated in response to Q.2.2 there will be a need to widen vehicular access to enable such vehicles to get close to the theatre, as they do in London. Remember the vast majority of people will come from outside the immediate Tunbridge Wells area, hence the need for greater parking facilities.</p> <p>Entrance to the Scenery Dock will have to accommodate vehicles, often the stage manager for the production and his staff maintain spare equipment, costumes, etc which they may need during performances, also if swords, firearms or explosive are used they require a secure (approved by police) store, often in a built-in safe within the tour vehicles, hence they will need to remain</p>				

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				<p>within the dock, which as we have suggested must be secure and have security cameras monitoring the immediate area.</p> <p>Car Parking:</p> <p>See our comments Q2.3. My members disagree with the comments set out in this section.</p> <p>Taxis:</p> <p>This is a good example of lack of detail, most taxi drivers were concerned that the proposed changes may well affect their business.</p> <p>Set Down &amp; Pick Up:</p> <p>There may well be opposition to these proposals from traders in Mount Pleasant Road, who rely upon short stay parking to attract custom.</p>				
<a href="#">CDPF_15</a>	Marguerita Morton	I am in general agreement with the objectives and vision as stated in paragraphs 1 and 2 of Point 2.1 Vision statement. However , I do not agree with moving the civic centre or Town Hall further down the hill away from the central position that	1. Agreed 2. Not agreed 3. Agreed 4. Agreed 5. Agreed 6. Not agreed 7. Agreed providing it is an enhancement of the existing Town Hall buildings	Of the context for the Framework, I think that points 2, 3 and 4 are the most important. Probably congestion is the biggest challenge to the town centre and this has to be expertly handled so that we do not worsen our current traffic problems.	4.1 Development of the Civic Quarter of the town is key to its success. If done without proper thought or planning, it could end in ruining the character of Royal Tunbridge Wells as a unique spa town with its own unique historic buildings. The existing town hall must be seen in this light. However, I do	<p>I will repeat the comments given by the RTWTF in its response to the Issues and Options consultation paper.</p> <p>"While it may be hard to agree a single vision of how the Borough will look in 20 (or even 10) years' time, doing nothing to shape the future is not an option. <b><i>The high pressure on new housing and the limited growth potential of the town of Royal Tunbridge Wells requires an urgent and positive response to meet</i></b></p>	Comments noted.	No change to draft document.

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		it currently holds. The Town Hall is an iconic building and together with the new Cultural Hub will be the cultural and civic centre of the town. Together they form the civic quarter; splitting one of the components off to a different site makes no sense. I agree that the building is outdated and needs retro-fitting to become energy efficient but this can be done through a Local Partnership joint venture between LGA and HM Treasury. The programme is supported by government departments and is available to all local government bodies and it will cost a fraction of the estimated cost suggested by TWBC. I agree that the building as a whole should be refurbished so that they can become fit for purpose and subsequently let to private business or flats.		On streetscape improvements, great consideration has to be given to the repaving of the road surface as it is the Council's plans to extend the shared space area down the hill of Mt.Pleasant. All of this area has to be of high quality and be consistent in design and materials all the way down. If it isn't, it will not achieve the improvement to the town's aesthetics or join up the top and bottom as desired.	<p>agree that the Assembly Hall has outlived its usefulness as a theatre. To create a modern cultural theatre would help to make Royal Tunbridge Wells a "destination town" which will bring in more tourist income.</p> <p>4.2 I agree with the objectives for the Cultural and Learning Hub.</p> <p>4.3 I agree that this building forms a block with the Assembly Hall and that the integrity of the group of buildings should be kept. But imaginative refurbishment or restructuring will be required to convert these buildings into modern day usage. A green park area in front of the block would be desirable.</p> <p>4.4 I agree that we need to keep and enhance the two Decimus Burton buildings. If the car park area is returned to landscaping that would greatly improve the look of the townscape. I would approve of the demolition of the Priplan House and the decked Town Yard car park to the rear. Then perhaps, the historic buildings could be returned to their original purposes.</p> <p>4.5 The Crescent Road multi storey car park is an absolute eyesore and there is nothing that can</p>	<b>current and future needs.</b> The alternative of unplanned and incremental growth is worse and risks destroying the character of the town and the surrounding rural areas that are so attractive for residents, visitors and businesses."		



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					be done to improve this blight on the landscape. It is a pity that the town planners did not have a better solution to parking in the town. Maybe they should have given more thought to Park and Ride developments which operate successfully in other conurbations.			
<a href="#">CDPF 16</a>	Dr P Whitbourn	<p>This so called "Planning Framework" seems to me to be a classic case of "putting the cart before the horse" and, in my view, it should not exist at all.</p> <p>Far from giving useful planning guidance that can inform future development proposals, the draft appears merely to attempt to give planning respectability to an existing, far-advances and high controversial Council scheme that has already been worked up in considerable detail, and is currently being publicly pushed hard by the Council in advance of a Full Council meeting on 6th December.</p> <p>I personally consider the whole approach that has been adopted to be</p>	<p>I wholeheartedly agree with the Key Principle that "The existing buildings are part of an important listed group within the town centre conservation area and should be conserved and enriched". Sadly though, that seems unlikely to be the case if the public uses for which they were originally designed come to be removed, and unsuitable private uses, such as residential, are regarded by the Council as acceptable in planning terms.</p> <p>I also agree with the Key Principle that "the existing buildings should maintain a united civic appearance". However, in my view, this can only be properly and fully achieved by uniting the components of the group, and sympathetically upgrading them to fulfil their civic, cultural and community functions, perhaps floodlighting the strong tower of the Town Hall, and the frontages of the Assembly Hall and the</p>	<p>In the second paragraph on page 22 the overworked, trite and somewhat meaningless expression "not fit for purpose" is trotted out yet again, in relation to the Town Hall, but with the qualification that it "has significant potential for re-use through remodelling". On page 35 "office space" is specifically put forward as a potentially suitable use, so why not for Council offices, especially as page 29 requires that "part of the Town Hall buildings should be reserved for publicly accessible civic-type functions in any event.</p> <p>Incidentally, the present Theatre and Council Offices are not situation at the junction of Mount Pleasant Avenue and Crescent Road, as stated on page 22, but at Crescent Road's junction with Mount</p>	<p>Although the Conservation Statement on pages 12 and 13 is clear in stating that "any proposals affecting the Town Hall will be expected to retain significant features, such as the main entrance, staircase and <b>Council Chamber in situ and allow their continued use for civic functions and other compatible uses</b>", the first two paragraphs on page 35 appear potentially contradictory, especially as the Council has exhibited illustrations of the Town Hall, showing the Council Chamber demolished. [TWBC: see <i>illustration in attached full scanned response</i>]. Axially aligned on the main entrance and ceremonial stair, the Council Chamber, in its courtyard, is at the very heart of the Civic Complex and should remain so. While I would not, of course, suggest that the Great Court at the British Museum is at all comparable with the courtyard at the Town Hall, the Great Court</p>	<p>Almost exactly two years ago, an Examination in Public was held before an Independent Inspector, on the Site Allocations aspect of the Tunbridge Wells Development Plan, mentioned on page 10. Neither Calverley Grounds nor Great Hall Car Park were the subject of site allocations at that hearing and, had they been so, interested parties and the general public would have had the opportunity of putting reasoned arguments before the independent Inspector.</p> <p>As, apparently, Supplementary Planning Documents (SPDs) are not required to go through the rigours of an independent Examination in Public, in the way that Site Allocations are, the Council is in effect using the device of an SPD to by-pass the normal system of scrutiny by an independent Inspector.</p> <p>This could form a worrying precedent, should the Council again wish to promote commercial development on other public open space, if all it has to do is to produce an SPD for the purpose, and give itself approval for the document, without the safeguard of an independent Inquiry. One way of dealing with this anomaly might be for any subsequent planning application to be "called in" for determination by central government, following an Inquiry; while another might be through an Inquiry into a Compulsory Purchase</p>	<p>Comments noted.</p> <p>The draft SPD sets out the current policy position in regard to the sites the subject of the document. This includes policy considerations regarding the future use of the existing Town Hall complex, possible alternative uses and suitable alternative public and civic provision elsewhere in the town centre.</p> <p>It is not the role or purpose of the draft SPD to set new land use policy. As stated in the document itself the draft SPD has been prepared to supplement existing planning policies and guidance. The intention is that this additional guidance will help shape and influence future development proposals that come forward.</p> <p>Some of the comments are generally directed to the Civic Project proposals themselves and the possible impacts of such a development.</p> <p>Where the comments relate to the Civic project proposals the comments have been forward to the project team for consideration.</p>	<p>Changes made to draft SPD.</p> <p>At 1.1 Introduction page 5 delete final paragraph:</p> <p><b>“The Council may wish to adopt the framework as a Supplementary Planning Document (SPD) in due course, and would undertake further statutory consultation as part of this process.”</b></p> <p>At 3.1 Overall Framework page 22 amend paragraph 2 to refer to:</p> <p><b>“at Crescent Road's junction with Mount Pleasant Road.”</b></p> <p>At pages 8 and 12 and 3.2 Public Realm page 25 paragraph 4 amend to refer to:</p> <p><b>9 and 10 Crescent Road.</b></p> <p>At 4.5 Crescent Road page 39 paragraph 1 amend to refer to:</p> <p><b>Calverley Park Crescent.</b></p>

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		completely wrong-headed. Instead, I would favour an alternative approach that would make better use of the existing listed, purpose-built, competition-winning Civic Complex, embracing an upgraded Library, Museum, Art Gallery and Adult Education Centre, together with an enlarged Assembly Hall and reduced and refurbished Council Offices that incorporate a "one stop" Gateway facility, to form a single, distinctive, legible and vibrant Community, Civic and Cultural Hub for the town and the wider area around. I included a rough diagram illustrating such an approach in my response to the April to June Consultation, and a further diagram is shown on the opposite page for ease of reference. [TWBC: see diagram in attached full scanned response]. Such as approach would accord with the current Local Development Plan, as I understand it, which the Calverley Grounds scheme	Library.  The expressed possibility of creating a private inaccessible block of flats that looks like a Town Hall seems to me to be wrong in principle, and to be at odds with the identified Key Principle of a "cohesive identity with clear purpose and activity" at the civic heart of the town. This quality the present listed Civic Complex and War Memorial undoubtedly have in abundance. The disparate arrangement envisaged in the draft, on the other hand, could well result in an incongruous new Council Chamber at the bottom of a steep hill, facing a new pedestrian public square, but separated from the new civic buildings by a gated block of private luxury flats, in a key corner position on the brow of the hill. This would, in my opinion, be the opposite of a Key Principle "well-connected environment", and would do the opposite of "contributing positively to the legibility of the town".	Pleasant <u>Road</u> .  On page 25, I am strongly in favour of removing car parking generally from Civic Way, and improving the quality of the landscaping. However, I am equally strongly against closing part of it as a private enclave. Not only would it be inappropriate to convert the listed Town Hall into a private residential compound, but the question of parking for disabled uses of the Cultural Hub needs to be addressed.  On page 28, the draft gives no useful guidance whatsoever on the important question of taxis. An effective local taxi service, centred on Tunbridge Wells, is a fundamental part of our public transport system, and deserves much more careful consideration than the perfunctory mention in the draft. Unlike some other towns, such as Sevenoaks and Battle, Tunbridge Wells is fortunate in having a railway station that delivers rail passengers straight into the heart of the town. The downside of this favourable arrangement is, of course, the congestion	could nevertheless be seen as an instructive object-lesson that illustrates a case of a retained structure incorporated into an imaginatively roofed and refurbished courtyard, albeit on a much larger scale.  On page 38, the pair of Decimus Burton villas next to the Police Station is wrongly described as nos. 9 and 10 Calverley Terrace, an address that has never existed. The pair was originally the last of four and numbered 7 and 8, as show on this diagram [TWBC: see diagram in attached full scanned response]. As the sole survivor of that historically very interesting feature of the Georgian new town, the pair could reasonably be described simply as Calverley Terrace or, alternatively, by its present postal address, namely nos. 9 and 10 Crescent Road. Either way, the pair is important in terms of Decimus Burton's seminal plan for the upper part of Tunbridge Wells and it should form an integral part of the wider Cultural Hub, suitably restored and accessible to the public.  On page 39 reference is made to "Calverley Park Terrace", another address that does not exist and never has. From the	Order, if those statutory powers come to be used, as indicated on page 46.  The last paragraph on page 5 reads "The Council <u>may</u> wish (my underlining) to adopt the framework as a Supplementary Planning Document (SPD) <u>in due course</u> , and <u>would</u> undertake <u>further</u> statutory consultation as part of this process". I was very surprised, therefore, to be told by the Council official at the drop-in session held by the Council in the Council Chamber on 15th November, that no further consultation is needed. If this is so, then I see page 5 as grossly misleading.  <b>Summing up: "Cultural investment for the future"</b>  In the local press recently, a Council spokesperson was quoted as summing up its initiative as " <b>cultural investment for the future</b> ". I entirely support that aspiration in principle, but differ about the means of achievement.  To spend £90million on a new office block of no cultural value, and a new theatre with a seating capacity not much more than our present theatre, while spoiling our historic town centre park, and leaving the Art Gallery/Museum cluster as a remote and disconnected poor relation, seems to me to be no way to set about achieving that worthy aspiration.  Instead, I should like to see a less extravagant sum spent on a sympathetic remodelling of our listed and competition-winning Civic Complex, to embrace a full range of cultural activities, including improved music, dance and drama, much expanded arts and crafts, and first class museum, library, adult education and other community facilities in a joined-up cultural, civic and community	Any planning applications that may be submitted for proposed development on any of the sites included in the SPD will be considered on merit and will need to demonstrate that the development proposed is acceptable in all regards including conservation, heritage, highways and public realm.  Revised / additional wording to draft SPD considered to address some of the matters raised.	

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		<p>does not.</p> <p>With regard to Calvetley Grounds, I am keen to see the production of an enlightened Management Plan for this historically and recreationally vitally important open space, avoiding destruction of the key belt of trees that define its western edge, and avoiding, too any underground car-parking, but pursuing the idea of additional access from the north, if possible.</p>		<p>that can be generated in the busy stretch of Mount Pleasant Road between the bottom of the Wells Hill and the High Street Railway Bridge. The taxi rank, taxi waiting areas, bus stops, busses waiting, "kiss and ride" drivers picking up and setting down rail passengers and large numbers of pedestrians, including shoppers, many of them crossing the road, and the closeness of the Vale Road and Grove hill Road junctions render this area a scene of great activity at times, even without the unwelcome complications of coaches and extra vehicles that a new theatre would bring. It is not easy to see how "public realm improvements" could satisfactorily deal with the new situation, and the draft is woefully lacking in any serious guidance on this point.</p>	<p>context, it appears this should read Calverley Park <u>Crescent</u>.</p>	<p>hub, its various components being physically connected, under a single, unified and enlightened management regime.</p> <p>The cultural life of Royal Tunbridge Wells and the Kent and Sussex High Weald should surely focus on a much broader vision than the occasional west-end musical or travelling show.</p>		
<a href="#">CDPF 17</a>	Ian Bruce					<p>Ahead of the vote regarding the proposal to create a new civic building and theatre in Calverley Gardens, I implore you to consider the following, and reject the current proposal, rather than be responsible for a legacy that current and future residents will blame you for.</p> <p>The "Vision &amp; Objectives" in the "consultation" document appear to have been written around and to "justify" the council's proposal, rather than being</p>	<p>Comments noted.</p> <p>Some of the comments are generally directed to the Civic Project proposals themselves and the possible impacts of such a development rather than related to the purposes of the draft document, its structure, form and content.</p> <p>The town centre Cinema site is not included in the draft</p>	<p>No change to draft document.</p>

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						<p>drafted before, in order to guide the design and provision.</p> <p>There is already a significant site where the cinema used to be that is right in the centre of town (mid-way between the High Street and Fiveways), that has been a vacant eyesore for years and would be an <u>ideal</u> location for a new Theatre.</p> <p>Access to the Scene Dock of the proposed theatre on Calverley Gardens for large articulated touring show vehicles is entirely inadequate onto Grove Hill, as is their route through the town via Vale road to access it. Modern shows travel with several very large articulated vehicles that need excellent access not only to the site but also to reach it through the town, and if the "objective" is to attract a variety of shows then this access is critical.</p> <p><b>A theatre on the old cinema site could be easily accessed from Church Road, and the naturally sloping site could accommodate a scene dock, fly tower and auditorium without significant impact on the skyline.</b></p> <p>If the "Vision" is to <i>"to create a new focal point for civic functions and public life in Tunbridge Wells and will play a major role in strengthening Tunbridge Wells' identity as a cultural destination for the south-east"</i> then build a new theatre and civic centre on the Cinema site, with "flexible spaces" for arts and exhibitions, then redevelop the inside of the existing Theatre to create modern open plan council offices (if needed) accessible from the existing town hall next door.</p> <p>Rather than encourage more traffic onto Mount pleasant (by building the "Civic suite", theatre, and increased car parking), it would be better to <b>make</b></p>	<p>SPD document since it is subject to its own policy allocation in the adopted development plan and has received specific planning permission.</p> <p>Any planning applications that may be submitted for proposed development on any of the sites included in the SPD will need to demonstrate that the relevant development can be satisfactorily accessed / serviced and that there is no unacceptable impact on the highway network.</p>	



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						<p><b>Mount Pleasant a “shared space”</b> for pedestrians, Busses and Taxis only, and improve the flow of traffic on the A26 (north/south) and A264 (east/west).</p> <p>The shared space at the top of Mount Pleasant would then be directly outside the new Theatre and Civic centre on the old cinema site.</p> <p>The existing Town Hall &amp; Assembly Hall could, and should, remain public access and NOT be converted to private offices or residential.</p> <p>Without a specified use in the plan there is a very real risk the site or parts of it will become vacant, and then commercial pressures will lead to it being converted into office or residential use at a later date to "save" it.</p> <p><b>This is a central and important area and amenity to the town and should not become "dead" as far as the public are concerned (as would be the case if it were commercial or residential).</b></p> <p>I would suggest <b>removing the council chamber that has been built into the courtyard and reinstating the courtyard as a cultural/cafe/leisure space.</b> If the old fly tower/stage were removed then that outside space could be enlarged. The Chamber could be incorporated in the old theatre building.</p> <p><b>Demolishing Town Yard Car Park would also allow the space, including Monson Way, to become a great pedestrian outdoor space</b> (provided the parking is reinstated - eg by extending the present multi-storey car park onto the Crescent Way site).</p> <p>No mention in the consultation</p>		

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						<p>document was made of alternative accommodation for the Police and Courts - where are these to go? Any re-use of this building should be with public access as its main priority.</p> <p>Calverley Terrace should be preserved and the frontage landscape improved. Demolition of Town Yard Car park as suggested above would provide a great setting to the rear.</p> <p><b>Use the Crescent Road site to add a "facade" extension to the multi-storey car park to improve its appearance and increase its capacity.</b></p> <p>A New Civic Suite located in Calverley Gardens is an entirely unnecessary building, and an inappropriate loss of some of the outside amenity space in the centre of town. It will further distance the park from the street, when it should be protected and enhanced as an open space.</p> <p>All the facilities proposed for the "Civic Suite" can be accommodated in the existing development of the Town Hall/Theatre/Library/Police Station</p> <p>range of buildings, and new Theatre/Civic Centre on the old cinema site.</p> <p>Little or no consideration has been given to the use of the old buildings if the developments proposed are implemented.</p> <p>More consideration needs to be given to improving the traffic flow (not just trying to restrict it!).</p> <p>The encroachment of development onto precious outside amenity space in the centre of town should be resisted at</p>		

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						<p>all costs.</p> <p>Any future development intended to make the town more attractive to visitors is a waste of time unless the access by car from the A21 is SIGNIFICANTLY improved (not simply messing about with traffic light timings etc).</p> <p>In summary, considerate redevelopment of the existing range of buildings, keeping the facades where possible, and building a new cinema and civic centre/arts space on the old cinema site, together with road improvements would provide the town with a central, accessible, and attractive heart, without the need to encroach on any green spaces, or risk large tracts of unfilled office space right in the centre of the town.</p> <p><b>I urge you to reject the current proposals and demand an alternative utilising the current sites available.</b></p> <p>Thank you for your time.</p>		
<a href="#">CDPF 18</a>	Southern Water Services Plc					Thank you very much for consulting us on the draft Civic Development Planning Framework SPD. We confirm that we do not have any comments to make on it at this stage.	Noted.	No change to draft document.
<a href="#">CDPF 19</a>	Doreen Lambert					<p>I strongly object to the proposal to build a new theatre and council offices in Calverley Grounds.</p> <p>I looked at the plans when they were hidden away in darkest Ely Court (shades of the planning proposals in the Hitchhiker's Guide to the Galaxy to avoid scrutiny?) in the summer time and the footprint of the proposed council site will take away a sizeable part of the lower park and destroy the lovely view. The trees that are there hide a lot of ugliness but you will</p>	<p>Comments noted.</p> <p>Some of the comments are generally directed to the Civic Project proposals themselves and the possible impacts of such a development rather than related to the purposes of the draft document, its structure, form and content</p>	No change to draft document.

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						<p>destroy them.</p> <p><b>Why do we need a new Civic Complex?</b></p> <p>In 2006-07 there was a questionnaire about the future of the Civic Complex when Mr Bullock was on the council and wanted to sell the Civic Complex for flats/shops ect. and move the Council offices. The <b>questionnaire was</b> sent to 2,400 households, of which 1,174 replied. A pretty good response for any questionnaire. <b>People wanted it to remain as it was and not converted into shops/offices/flats.</b></p> <p>Do you even listen to what people want – just a few years later and you are trying to sell by stealth.</p> <p>Do you think ‘the natives’ will stump up the cash for your grandiose schemes costing 90 millions of pounds? If the council need new offices why not take up one of the <b>many</b> vacant office plots in the town or villages in the area, a much cheaper option and you can have your pick! We don’t need council staff occupying prime sites in the town in this day and age. We have the Gateway to access many services.</p> <p>What happens when/if Civic Complex is deserted? Do we have another eyesore like the old cinema site? The cinema site has been an eyesore for 17 years.</p> <p>I would like to know how much has been spent on the consultancy paper ‘Draft Planning Framework’ prepared earlier this year. I bet it wasn’t cheap. But no matter council tax payers will fund it.</p> <p>There is nothing to stop the council staff moving into external offices if the current ones are so ill-suited (like you tried a few years ago with the old Land Registry building) and keeping the</p>		



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						<p>Town Hall for Council meetings - and celebrate our civic space rather than hiding in Calverley Grounds..</p> <p>I've seen a quote from a survey commissioned by TWBC in 2015, which states that 55% of residents said they would not pay £10 more in council tax for a new theatre. I'd imagine the figure will be much higher if the full TRUE cost is highlighted. I like going to the theatre. But I dislike having to pay more council tax. I would also question the figures which state the benefit to the town will be £14m to the local economy.</p> <p>Calverley Grounds is a beautiful oasis of calm in the middle of a busy town. If you have your way there will be noise and disruption in a beautiful park; during building works. More traffic generated in a busy section of the town and people going to the council offices.</p> <p>People congregate there now without any need to add expensive glass boxes on either side of the grounds. Just take a walk there any time during the summer and even in winter with the ice skating. The lovely little café which provides such an excellent service will disappear but you aren't concerned about that</p> <p>I read in your Draft Planning Framework that the developments would, <b>“Create a forum for public life – a destination for the wider area”</b>. What a load of utter balderdash. What is a destination for the wider area? Who writes these things how much did it cost the council taxpayers for them to write such drivel?</p> <p>I object strongly to any changes in the use of the Civic Centre. I object strongly to the building of a new theatre and think the existing theatre should be</p>		

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						<p>refurbished or failing that knocked down and a new one built on the site.</p> <p>I object strongly to the building of another office block in the grounds – AKA the new Civic Centre. <b>WE DON'T NEED IT.</b></p> <p>Fix what is really broken in our town (lots of empty shops around the town, traffic jams, poor transport links, congestion, lack of affordable parking for those currently trying to work/shop in the town, etc) before you build these monuments to personal vanity.</p>		
<a href="#">CDPF_20</a>	J Paul Lambert					<p>I strongly object to the proposal to build a new theatre and council offices in Calverley Grounds.</p> <p>I together with a large percentage of the town population actually had no idea you were planning this vanity project. Why do I object:</p> <ol style="list-style-type: none"> <li>1. In private industry if one wishes to spend, this has to be justified to the shareholders, in this case the citizens (tax payers) of RTW. It has to payback, provide benefits that can be measured, it will have a Cost Benefit Analysis (CBA). I have seen no CBA that shows the shareholders of the town would see any benefit from this proposal.</li> <li>2. Even in the event of it being justified on a CBA the proposed location is utterly wrong.</li> <li>3. A park is for local &amp; visitors to the town to enjoy. Not be destroyed by vain council officers who will ruin it for others as they want a nice view.</li> <li>4. In the era of austerity why waste £70,000,000 of tax payers money. Will we see that reduction in council spending?</li> <li>5. If the money is to be borrowed</li> </ol>	<p>Comments noted.</p> <p>The comments are generally directed to the Civic Project proposals themselves and the possible impacts of such a development rather than related to the purposes of the draft document, its structure, form and content</p>	No change to draft document.

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						<p>then what would be the yearly interest on this?</p> <p>6. Will you be reducing staffing levels to payback the monies borrowed?</p> <p>7. The town's roads are falling apart use the money for this &amp; social housing projects that show real benefits.</p> <p>8. How long would the current offices take to sell &amp; find new uses? Years whilst the town would have two bomb sites opposite each other.</p> <p>9. We have no requirement for a new theatre, if the current one is refurbished that's good enough for me.</p> <p>10. Do another poll of the townspeople to find out our views. Or do you fear it will be as last time, a majority against the proposal.</p> <p><b>Do we need a new Civic Complex in Tunbridge Wells?</b></p> <p>In 2006-07 there was a questionnaire about the future of the Civic Complex when Mr Bullock was on the council and wanted to sell the Civic Complex for flats/shops ect. and move the Council offices. The <b><i>questionnaire was</i></b> sent to 2,400 households, of which 1,174 replied. A pretty good response for any questionnaire. <b><u>People wanted it to remain as it was and not converted into shops/offices/flats.</u></b></p> <p>Do you even listen to what people want – just a few years later and you are trying to sell by stealth.</p> <p>People congregate in the park now without any need to add expensive glass boxes on either side of the grounds providing council officers with a good view whilst ruining it for taxpayers. Just take a walk there any time during the summer and even in winter with the ice skating. Use your</p>		

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						<p>imagination what will it look like with two concrete monstrosity dumped there on opposite sides. No doubt the little café which provides such an excellent service will disappear.</p> <p>From your Draft Planning Framework my wife read to me that the developments would, “<b>Create a forum for public life – a destination for the wider area</b>”. Could not agree more with her words: What a load of utter balderdash. What is a destination for the wider area? Who writes these things how much did it cost the council taxpayers for them to write such drivel?</p> <p>I object strongly to any changes in the use of the Civic Centre. I object strongly to the building of a new theatre and think the existing theatre should be refurbished or failing that knocked down and a new one built on the site.</p> <p>I object strongly to the building of another office block in the grounds – AKA the new Civic Centre. <b>WE DON'T NEED IT.</b></p> <p>Fix what is really broken in our town (lots of empty shops around the town, traffic jams, poor transport links, congestion, lack of affordable parking for those currently trying to work/shop in the town, etc) before you build these monuments to personal vanity. If the councils grandees want a vanity project, let them build it with their own money. But not in our park.</p>		
<a href="#">CDPF 21</a>	John & Ann Pickering					Would you please register and acknowlege my endorsement of Philip Whitbourn's consultation response dated November 28th ..Many thanks	Noted	No further change to draft document.
<a href="#">CDPF 22</a>	John Telling	I do not support the proposal to create a theatre separate from the proposed Cultural and	'A well connected environment':  Vehicular access is to and around the proposed	How wiil this location for a theatre reduce traffic congestion and encourage alternative modes of transport? It		*This is a hugely speculative proposal, with the risk being carried by council tax payers. The current members, carrying no financial responsibility, will be well out of the way before the	Comments noted.  Some of the comments are generally directed to the Civic Project proposals themselves	No further change to draft document.

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		<p>Learning Hub development. Phrases like 'a fulcrum which links together the upper and lower parts of Tunbridge Wells' are meaningless. Rather a theatre in this location would create further traffic congestion in the station area. As for being 'a cultural destination for the south-east', how can a town theatre with touring company productions compete with the London theatre offer? The proposals, which include commercial offices, are at the expense of the Calverley Grounds, are speculative, and potentially will create a huge debt burden for residents into the distant future. This is unacceptable. If such a scheme is viable why isn't money being invested from private sources in a town theatre? The Assembly Hall is a civic building available from time to time to local organisations. With a money making imperative there is no guarantee that the proposed theatre would provide the same local service.</p>	<p>theatre site is very limited. To claim that marginal local infrastructure 'improvements' are going to dramatically increase pedestrian and cycle use are pie in the sky. (Cycling will only increase when the conditions for cyclists across the town and the shocking behaviour of some drivers towards them are addressed. (Where are the traffic police now?)). As for 'contributing positively to the legibility of the town', what does that mean?</p> <p>'Integration of development within its local context':</p> <p>I do not understand how constructing a dominant building overlooking, and on part of the Calverley Grounds, with the felling of mature trees which give the Grounds their ambience will 'enhance' the Grounds; furthermore the Grounds are perfectly accessible now.</p>	<p>will increase traffic in an area already under pressure, and as no evidence is produced for other claims on modes of transport they are purely speculative.</p> <p>The access to the Calverley grounds is fine. The proposed theatre/commercial office/civic complex will intrude literally and figuratively onto the park, a public open space, to enable commercial development. I believe it is proposed not to replace the toilets, which with the closure of the Pantiles facility means no public toilets in the lower part of the town. Obviously people using the park casually and for events, and the café, particularly those with children need access to toilets. The loss of amenity, established open space and mature trees is unacceptable.</p> <p>Servicing access to the theatre for large vehicles is inadequate, and seems to have been an after thought, and dependent on the cooperation of an adjacent landowner(s). Even if agreement can be reached what happens in ownership</p>		<p>burden really becomes apparent. The commercial viability is highly questionable. A number of businesses are quoted in the local press as supporting the proposed theatre, though it is not their money at stake. Why don't they therefore acquire a site, and finance a theatre speculation themselves?</p> <p>*The theatre proposal is for the wrong site; it should be part of the Cultural and Learning Hub;</p> <p>*Because this is a Council application it inherently entails a business proposition for which council tax payers will have liability: yet no business analysis or information is included in the report:</p> <p>*Access for the servicing of the proposed theatre is ill-conceived;</p> <p>*Traffic congestion will be exacerbated at the lower end of the Mount Pleasant Road, indeed a large new car park will encourage it, and other claims about cycling and walking are pure speculation;</p> <p>*The physical impact on the Calverley Grounds and its ambience is unacceptable, as is the loss of toilet facilities and the impact of that on the usability of the park on a day to day basis;</p> <p>*One is left with impression that people have worked hard to retrospectively justify this flawed proposal with the creative use of language and assumptions;</p> <p>Please think again about a theatre development integrated into the 'Hub', which is where it should be, and leave the park alone. The Council should concentrate on the services we need:</p>	<p>and the possible impacts of such a development rather than related to the purposes of the draft document, its structure, form and content.</p> <p>Where the comments relate to the Civic project proposals the comments have been forwarded to the project team for consideration.</p> <p>Any planning applications that may be submitted for proposed development on any of the sites included in the SPD will need to demonstrate that the relevant development can be satisfactorily accessed and serviced.</p>	



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				changes?		street cleaning, waste collection, open space maintenance, toilets etc., not on promoting a speculative venture with an unquantifiable risk to council tax payers years into the future. There is a strong sense that this proposal has been written in justification of some very grandiose thinking rather than to provide verifiable information and evidence on which to base a decision. I therefore OBJECT to that part of the proposal concerned with constructing a theatre/civic/commercial office development utilising part of the Calverley Grounds. The right place for a revamped theatre is as part of the cultural Hub.		
<a href="#">CDPF_23</a>	Paulette Pollock					<p>We were dead against the new town hall and theatre being built at huge expense which will not be covered by income. We thought the present Art Deco building should be remodelled to suit present day working.</p> <p>There is not the infrastructure in the form of car parks or roads to take a larger theatre crowd. Most local groups I have spoken to are happy with the present theatre.</p>	<p>The comments are generally directed to the Civic Project proposals themselves and the possible impacts of such a development.</p> <p>Noted as comments.</p>	No change to draft document.
<a href="#">CDPF_24</a>	Lucinda Willis	I strongly disagree with the proposals for the new civic centre and theatre. The town does not have the infra structure to cope with an audience of 1,200. Also why is it costing so much and why has it gone up by 18 million? It is such a lot of money that the council could be putting to better use. Helping the homeless, helping people in real	It is a preposterous amount of money which the council tax payers of RTW will end up paying for many years. Why do we even need a new theatre and civic centre? Local people don't want this and don't want to pay for this.	There is no infra structure to support the aim of bringing many more people into the town through the civic centre and theatre. In these times of austerity this amount of council spending is clearly a vanity project on the part of the council which does not have the support of the town or the local community.			<p>The comments are generally directed to the Civic Project proposals themselves and the possible impacts of such a development.</p> <p>Noted as comments.</p>	No change to draft document.

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		hardship who are using food banks. Helping families with young children who are living in poverty.						
<a href="#">CDPF_25</a> (duplicate )	Lucinda Willis	I strongly oppose the councils vanity project which is a complete waste of RTW council tax payers money.					Noted as comments.  The comment is directed to the Civic Project proposals themselves and the possible impacts of such a development.	No change to draft document.
<a href="#">CDPF_26</a>	Christopher Mortley					<p>The introduction to this draft supplementary document, supporting the Civic Development Planning Framework, states that it ... <i>provides the local community with the opportunity to influence development, and to ensure that a comprehensive approach is taken to the preparation of redevelopment proposals for the sites (which are interrelated).</i></p> <p><b>1 Community influence:</b> This draft supplementary document is intended to enable the Council to adopt the framework as a Supplementary Planning Document in due course. Although intended to allay misgivings already expressed by the local community, in fact it may achieve the opposite. The document focuses on conformity with planning process, in the context of the present disposition of the built environment, but commentary is absent on the prospective impact on major employers in close proximity (e.g. the biggest town-centre employer, and the town's flag-ship shop), the town centre blight that will prevail during construction and redevelopment phase, and the vehicular congestion that will arise on completion.</p> <p>It is already evident from responses to previous consultations, and from public media reports, that there is substantial concern about both the underlying</p>	<p>Comments noted.</p> <p>Some of the comments are generally directed to the Civic Project proposals themselves and the possible impacts of such a development rather than related to the purposes of the draft document, its structure, form and content.</p> <p>Where the comments relate to the Civic project proposals the comments have been forward to the project team for consideration.</p> <p>Some of the comments made relate to land use policy and allocations already included within adopted planning policy documents. It is not the intention of the draft SPD to make new policy or allocations.</p> <p>Any planning applications that may be submitted for proposed development on any of the sites included in the SPD will be considered on merit and will need to demonstrate that the development proposed is acceptable.</p>	No change to draft document.

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						<p>wisdom of this proposed speculative semi-commercial public wealth expenditure, and the insufficiency of analysis of the practicality of developing the Calverley Grounds and of redeveloping existing civic buildings after present use is abandoned.</p> <p><b>2          Redevelopment proposals:</b> The issues that trigger this range of new construction, redevelopment, and change-of-use proposals arise from the long-stated assertion that the civic buildings are unfit for purpose.</p> <p>It is anomalous to claim that, for the main building, <i>potential uses such as office space, academic use, hotel or residential use could all be considered as potentially suitable for the building, subject to commercial viability</i> (section 4.1) while at the same time failing to adequately explain why it is not fit for TWBC to use it as office space.</p> <p>Although specific reference is low-key, the proposal to develop a new civic theatre, with its associated utility &amp; service facilities, is the dominant community concern. It is said that current use of the Assembly Hall <i>is limited by poor back-of-house facilities and its lack of space, which, together with the capacity and layout of seating, makes it less attractive to touring shows</i> (Section 4.1).</p> <p>Much greater disclosure is therefore needed to demonstrate why the Assembly Hall cannot be modified to better suit contemporary needs e.g. by making use of the adjacent redundant Police and Court building (for performing artists and their props, etc), adjacent void space, and by undertaking more radical alterations within the existing site envelope.</p> <p>Furthermore, because the existing theatre is in close proximity with the</p>		

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						<p>Crescent Road car park, and has (potentially) better vehicle transit facilities than can be provided in the environs of the Calverley Grounds, much more effort is required of TWBC to explain how the proposed new theatre – opposite a busy railway station - can be serviced without causing major disruption in the Mount Pleasant area.</p> <p>Finally, the roles undertaken by GVA and Allies &amp; Morrison on behalf of TWBC should be made clear.</p>		
<a href="#">CDPF 27</a>	Stuart Page	<p>The Civic Development Framework has not been prepared in the context of a Masterplan for Tunbridge Wells. The text provides justification retrospectively for decisions made by the Council in respect of the Civic Centre, Crescent Road / Church Road, Mount Pleasant Car Park and Great Hall Car Park. It claims to offer guidance for planning when the major projects for the new Council and speculative offices and new theatre are at an advanced stage.</p> <p>The document includes uses for Calverley Grounds and the Great Hall Car Park that were not identified in the Site Allocations</p>	<p>A “sustainable future” is not one where increasingly scarce resources are used in preference to remodelling existing assets. The retention and enhancement of the existing Listed Buildings within the conservation area is the responsibility of TWBC as Local Planning Authority and user of the buildings: this includes options that are not addressed by current proposals for a new theatre and Council offices.</p> <p>The best use for Listed Buildings is their original use and where this is not possible then imaginative and reuse and adaptation is accepted: positive change is not guaranteed by the SPD; indeed the Council’s plans put the Listed Buildings at risk.</p> <p>“Cohesive identity” is best achieved by adapting the listed civic complex as one, not splitting off</p>	<p>This overall framework is not a true framework and not overall: it is not an overview of the town or the town centre because it focuses on a few sites for which the Council has predetermined decisions.</p> <p>Paragraph 3 proposes partial remodelling of existing buildings as a positive aim in contradiction to the opening sentence.</p> <p>£.2 proposes nothing that cannot be achieved proper design and planning of rehabilitation of the existing buildings, much of the poor condition being due to the Council’s neglect of its responsibility towards listed buildings in its care.</p> <p>Civic Way is a public space linking pedestrian routes notably to the new</p>	<p>The site allocation plan did not include a theatre on the Great Hall car park site nor an underground car park in Calverley grounds.</p> <p>Page35 includes comment on viable sustainable futures based on adaptation: this concept should include a thorough assessment of the economics of the reuse of the existing buildings: if the Council is relying on a new owner undertaking this work, then so could the Council which has a previously commissioned report (BDP) supporting the concept. Reuse of the Council Offices may include “Public realm improvements” but will be compromised by limiting access to the “edge of the Building”.</p> <p>There is no guarantee of an acceptable use: once having left the Council Offices and Assembly Halls and a new owner</p>	<p>Calverley Gardens and the Great Hall Car Park were not included in the Site Allocations proposed and examined in 2015(?).</p> <p>The SPD repeatedly seeks to justify predetermined decisions taken by the Council. This is not the purpose of SPDs set in Planning Legislation and guidance: they are for setting out supplemental standards (NPPF clause153).</p> <p>The SPD document is also not supported by fully formulated appraisals of Landscape/Townscape Impact or Transport Impact.</p> <p>Objectives in 4.6 are welcome and equally apply to imaginative reuse of existing buildings for which there are many examples world-wide that reflect sustainable resilient and long term values.</p> <p>There is no doubt that the infrastructure and public realm of Tunbridge Wells requires investment but this should come from a deep understanding of the character and needs of the town. The use of a SPD to justify designs developed in isolation from the rest of the town threatens the character of the</p>	<p>Comments noted.</p> <p>It is acknowledged that the draft SPD is not a masterplan for the town centre, and is not as extensive as such, since it focuses on a number of what are considered key sites. The document is not intended to be a town centre masterplan.</p> <p>Some of the comments made relate to land use policy and allocations already included within adopted planning policy documents. It is not the intention of the draft SPD to make new policy or allocations.</p> <p>.</p> <p>Some of the comments are generally directed to the Civic Project proposals themselves and the possible impacts of such a development rather than related to the purposes of the draft document, its structure, form and content.</p> <p>Where the comments relate to the Civic project proposals the comments have been forward</p>	<p>No specific changes to draft document in addition to those identified.</p>

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		<p>Local Plan (2016).</p> <p>The description on page 8 obscures the fact that the buildings comprising the Civic Complex are all nationally important Listed Buildings to which the Council has a duty of care both as owner occupier and planning authority.</p> <p>The proposal that new development in this area should include an extra 15,000sq metres of retail space is made without reference to the increase in retail space being provided on the former cinema site and in the expansion of RVP. These developments must call into question the need for extra retail in the areas covered by the draft SPD and it is not clear where such retail use could be located.</p> <p>A Masterplan should be developed first: the site allocations, decisions about the Theatre and Council Offices and other town centre improvements should follow in the context of the plan and not be predetermined by</p>	<p>Council office functions and Assembly Hall to another site leaving community use of the offices and Assembly Hall at risk of redevelopment by an unknown developer for an unknown purpose. The Council has a duty of care.</p> <p>The existing group of buildings is the Civic Heart of RTW and requires imaginative and constructive patronage.</p> <p>A “well connected environment” is a praiseworthy aim but interrupting pedestrian and general traffic by the introduction of frequent HGV, coach and small vehicle movements into a restricted junction interferes with movement and natural connections. It will also prevent effective improvement of the High Street/Grove Hill Road junction proposed by the Council’s own planning document prepared by its in house Architect (Royal Tunbridge Wells Public Realm Framework 2015).</p> <p>Intensification of use without adequate consideration and preparation a traffic management plan for the whole town centre is irresponsible.</p> <p>Integration of development is another welcome aim that fails to</p>	<p>cultural hub and should not be privatised. A stated aim is connectivity not gated privacy.</p> <p>Crescent Road development is cited as a means to provide passive surveillance while the Council proposes office buildings and car parking facing Calverley Grounds where residential passive surveillance is necessary.</p> <p>The SPD does not provide the opportunity to reassess the management and use of Calverley Grounds it is being used to justify predetermined siting of a theatre, offices and car park.</p> <p>A conservation management plan for Calverley Grounds should be a precursor to any changes.</p> <p>Page 26 is full of vague promises: the traffic/pedestrian/public realm uses should have been completed with KCC Highways consultation as part of a Masterplan for the town centre.</p>	<p>seeks a different use to that agreed the Council will hardly un-build a theatre and return? The town may well face a repeat of the cinema site fiasco.</p> <p>Through all this the Art Gallery/Museum /Library/Education hub is a perfect example of what can be achieved by consultation, imagination, skilled design and intervention in Listed Buildings. The Cultural Hub would be enhanced by a similar approach and a link to remodelled Assembly Hall Council Chamber and Council Offices.</p> <p>9-10 Calverley Terrace are important survivors of Decimus Burton’s plans for the Georgian new town and will benefit from the removal of the car park and especially the rear decked car park. In a restored setting they should become a museum of national status for Decimus Burton and his work.</p> <p>Improvements to Crescent Road are welcome subject to the quality of design and the way they relate to Calverley Crescent. Is it wise to remove a pinch point in the roadway that slows traffic, preventing fast driving?</p>	<p>civic core of the town and Calverley Gardens without solving problematic vehicle and pedestrian circulation.</p> <p>To achieve an inclusive sustainable vibrant and successful town a Masterplan is required within which the infrastructure, environment and the cultural and economic life of Royal Tunbridge Wells can be properly addressed.</p>	<p>to the project team for consideration.</p> <p>Any planning applications that may be submitted for proposed development on any of the sites included in the SPD will be considered on merit and will need to demonstrate that the development proposed is acceptable.</p>	



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		<p>piecemeal decisions.</p> <p>Office and business use on Mount Pleasant Avenue is clearly preferred by the Council. Such uses will fail to provide out of hours passive supervision of the Gardens and weaken the particular character of residential use on other sides of the gardens.</p> <p>The imposition of large scale structures on the western perimeter of Calverley Gardens does not respect Decimus Burton's design for views across a rural park to a wider landscape, that still survive due to tree cover. The adverse impact is clearly seen in the before and after images in the document where the new buildings dominate the view and will become increasingly dominant as the western boundary is approached.</p>	<p>be met by the SPD, which seeks to justify a sequence of piecemeal decisions in retrospect. There is no Conservation Management Plan for Calverley Gardens and this should be in place before development is planned. The Council's Arcadian "<i>rus in urbe</i>" concepts for RTW are contradicted by the introduction of major urban structures on the wooded western border of Calverley Grounds.</p> <p>"A high quality public realm" is not supported by increased traffic movement at a congested intersection on the north south "spine" of the town centre nor by introducing heavy goods vehicles, frequent deliveries and existing traffic flow into the small space between proposed theatre and offices.</p> <p>The proposed theatre is not "flexible" and discussion of this is inappropriate in an SPD which should be related to principles of design and policy, not justifying detail of predetermined decisions.</p>					
<a href="#">CDPF 28</a>	Sport England					<p>Thank you for consulting Sport England on the above named documents. Please find herein our formal comments for your consideration.</p> <p>Sport England has an established role within the planning system which</p>	Noted	<p>Changes made to draft SPD</p> <p>Add at 1.3 Planning Policy Context Page 13</p> <p><b>Development proposals that come forward must demonstrate how</b></p>



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						<p>includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport.</p> <p><b>Active Design</b></p> <p>Sport England would encourage reference to Sport England Active Design guidance, which goes far beyond sport and recreation and aims to build physical activity into everyday life.</p> <p>Having I reviewed the document, I note that it is very much in line with our Active Design guidance. In particular, there are references to:</p> <ul style="list-style-type: none"> <li>• Upgrading pedestrian courtesy crossings to improve sense of priority and calm traffic;</li> <li>• Creating wider footways to make more space for pedestrians</li> <li>• Shorter pedestrian crossings;</li> <li>• The potential for cars to be removed from Civic Way and the space to be re-landscaped to provide a high quality pedestrian environment</li> <li>• Public realm improvements along existing stretches of Mount Pleasant Avenue to the west of the proposed office building and civic suite, including better quality paving and planting, which would make the area safer and more pleasant for pedestrians – ie, a more walkable environment</li> <li>• Public use of the buildings implying retained public access to the space with opportunities for revised treatment such as seating and market stalls.</li> <li>• Design options for the Town Hall being required to facilitate a</li> </ul>		<p><b>consideration has been given to The Ten Principles of Active Design as set out in Sport England's "Active Design" guide.</b>  <a href="https://www.sportengland.org/facilities-planning/active-design/">https://www.sportengland.org/facilities-planning/active-design/</a></p>

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						<p>north-south pedestrian link through the block</p> <p>I would suggest that these points, which are welcomed as they are likely to help increase activity, would be further underlined by other suggestions within the Active Design guidance, such as the provision of signage telling pedestrians how far a walk it is from one location to the other (in minutes rather than distances) and the provision of water fountains and public toilets.</p> <p>Sport England and Public Health England have recently refreshed our 'Active Design' guide which provides some really useful advice and case studies with clear reference to the NPPF to maximise the opportunities for design in physical activity.</p> <p>Sport England would commend this to you and suggest the concept of 'Active Design' be incorporated into the SPD – please see website extract and link below:</p> <p>We believe that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active.</p> <p>Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities.</p> <p>That's why Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active</p>		

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						<p>Design.</p> <p>The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.</p> <p>The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often.</p> <p>The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design.</p> <p>Active Design has been produced in partnership with David Lock Associates, specialists in town planning and urban design.</p> <p><a href="https://www.sportengland.org/facilities-planning/active-design/">https://www.sportengland.org/facilities-planning/active-design/</a></p> <p>Or watch our short video here <a href="https://www.youtube.com/watch?v=mDaVBh1Bs7Y">https://www.youtube.com/watch?v=mDaVBh1Bs7Y</a></p> <p>Thank you once again for consulting Sport England.</p>		
<a href="#">CDPF 29</a>	Terry Cload	'I have had a most rare vision. I have had a dream—past the wit of man to say what dream it was.' Midsummer's Night Dream. William Shakespeare.	A number of the urban design principles are sound and should apply to any proposed development in the heart of the town, but many of the details are contradictory. For example, how can you	There are obvious contradictions in the proposed urban framework. It's stated that the existing Town Hall is not 'fit for purpose' but accepts that it could be remodelled. Why not	It is suggested that office space is a potential use for the Town Hall, but it is already being used for offices, so why move to another location completely separate from the cultural hub?	Spending £90M and inevitably more on an unnecessary office block and new theatre that intrudes into a much treasured conservation area and historical parkland when alternatives have not been properly researched or have been arbitrarily discarded without appropriate discussion seems totally unjustified when we are still recovering	<p>Comments noted.</p> <p>The draft SPD sets out the current policy position in regard to the sites the subject of the document. This includes policy considerations regarding the future use of the</p>	No change to draft document.

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		<p>And so it is with this 'vision' that seems to be anticipating and supporting an inevitable 'fait accompli' in respect of the forthcoming planning application for a new theatre and office block in a sensitive and historic part of the town centre.</p> <p>The existing council offices should be reduced in size as currently many functions are delegated, outsourced, or condensed by sharing responsibilities with other councils. This process is likely to continue and gather momentum thus obviating the need for opulent new offices.</p> <p>The Assembly Hall is a far superior site for an up to date theatre for Tunbridge Wells.</p> <p>The proposed guidance acknowledges that a new Local Plan is being developed but it seems that the opportunities created have not been considered. A new theatre site might be found that could be constructed in</p>	<p>have a new cohesive civic heart for the town when the proposed civic offices are completely separated from the cultural hub? If it is acceptable to separate the civic offices from the cultural hub why not move at a far lower cost into one of the many offices in the town that are currently being converted to accommodation? How can you open up new views into the Calverley Grounds conservation area without intruding into and diminishing the ambience and attraction of the parkland?</p>	<p>remodel it then and keep the 'civic heart' intact on its present site?</p> <p>Little consideration has been given into how the inevitable maelstrom of pedestrian and vehicular congestion that the proposed new theatre would generate can be dealt with. The Assembly Hall should be comprehensively updated and enlarged to include the adjacent police station complex that could provide for the ancillary needs of the theatre.</p>		<p>from the financial crash of 2008.</p> <p>With the National Debt at £1.8 trillion and rising and a likely recession just around the corner it seems inappropriate for a council that has for so long been debt-free to take on such an expensive project with its huge debt. There are other ways to provide an up to date theatre and council offices at a far lower cost.</p> <p>'Neither a borrower nor a lender be'. Hamlet. William Shakespeare.</p>	<p>existing Town Hall complex.</p> <p>It is not the role or purpose of the draft SPD to set new land use policy. As stated in the document itself the draft SPD has been prepared to supplement existing planning policies and guidance. The intention is that this additional guidance will help shape and influence future development proposals that come forward.</p> <p>The comments are generally directed to the Civic Project proposals themselves and the possible impacts of such a development.</p> <p>Where the comments relate to the Civic project proposals the comments have been forward to the project team for consideration.</p> <p>Any planning applications that may be submitted for proposed development on any of the sites included in the SPD will be considered on merit and will need to demonstrate that the development proposed is acceptable.</p>	

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		<p>partnership with a developer at a far reduced cost to council taxpayers. A low cost site for reduced size council offices could be found or existing redundant offices utilized.</p> <p>The proposal for part of the office block to be speculative assumes that demand for old fashioned offices will remain at today's levels when robotisation, home working, and the 'gig' economy are already rapidly changing the way we work and consequently the demand for 'conventional' office space.</p>						
<a href="#">CDPF_30</a>	Tunbridge Wells Over Fifties Forum	<p>Opinions given by some members of Tunbridge Wells Over Fifties Forum</p> <p>Car Parks</p> <p>Crescent Road:</p> <p>Extra charge should be made for the oversized cars.</p> <p>No plans shown for installing chargers for electric cars.</p> <p>Calverley Grounds:</p>					<p>Comments noted.</p> <p>Where the comments relate to the Civic project proposals the comments have been forward to the project team for consideration.</p>	No change to draft document.

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		<p>Outrage at the loss of mature trees.</p> <p>Police Station:</p> <p>An easily accessible police station still very much wanted for everyday help and to give a sense of security.</p> <p>New Theatre</p> <p>Although a larger theatre is accepted, it is not wanted in Calverley Grounds; it is still believed to be possible at Civic Centre area.</p> <p>Town Hall</p> <p>A conference centre would be very good for the town and could be sited at the present Town Hall building; could an addition of ensuite rooms could be built above? Delegates would arrive just a short walk from the station, or the car park is already there for the driver. Many believe that the present Town Hall could be renovated and kept in civic use and duelled with private offices. It should not be converted to flats; accommodation here would only be affordable to the very wealthy and would</p>						



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		<p>not benefit those in need of housing.</p> <p>Museum and Cultural Centre</p> <p>The new museum, library and cultural centre is broadly welcomed.</p> <p>Public Toilets:</p> <p>The loss of public toilets is a great cause of concerns, for people of all ages. Toilets are planned to be demolished at Calverley Grounds and the Pantiles: these are the only easily accessible toilets from shopping areas for all people. It is not easy for many people – elderly with breathing difficulties, young parents with toddlers and buggies - to get to toilets upstairs in shops and it should not be necessary, Public Conveniences should be just that, convenient! Whatever the promises, dog walkers and muddy children will not be welcome at the proposed new theatre. New toilets will be essential in Calverley Grounds if the new playground and newly</p>						

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		<p>landscaped grounds are to be fully appreciated and successful.</p> <p>Pavements</p> <p>Pavements and pathways must be wide enough to facilitate wheelchairs and mobility scooters as there will undoubtedly be more of these in public areas in the future.</p> <p>Funding for new developments:</p> <p>Great concern is shown over paying a loan back over 50 years. Should we be taking on so much debt when the country is in uncertain economic times; future generation will be saddled with this debt. Would this lead to cuts in services? Already the town looks tatty due to rundown services over the last few years. Would repaying such a huge loan lead to the end of grant funding for small charities or groups? Would it put an end to further development?</p> <p>The Town's Identity</p> <p>The Council goes to great lengths to</p>						

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		<p>market Royal Tunbridge Wells as an historic town but this does not reflect in any of the current new-build architecture or proposed plans. We will end up with a hotchpotch of design that will do nothing for the town's identity</p> <p><i>Denise Watts</i></p> <p><i>Chairman Tunbridge Wells Over Fifties Forum</i></p>						
<a href="#">CDPF 31</a>	TWAlliance	<p>In preparing the Civic Development Planning Framework (CDPF) alongside the Five Year Plan TWBC has failed the basic principles of consultation (aka Sedley or Gunning principles, as laid out in R v Brent London Borough Council (1985)). In short, underlying any requirement for a fair consultation is that the decision maker (in this case, TWBC) cannot have pre-determined the outcome and must have approached the consultation with an open mind. The Five Year Plan clearly states that the intention of TWBC is to build a new theatre on the Great Hall Car Park (GHCP), an office</p>	<p>As with our comments in the preceding section the Key Principles display evidence of pre-determination. The Key Principles in themselves are fine as stated, with two exceptions, but by referring to the proposed project it clearly demonstrates that this document has been written so as to provide TWBC with a planning policy document on which to "hook" the new Civic Complex and Theatre. For a project of this importance the planning document should carry more weight than a non-statutory SPD, instead drawing support from the Local Plan.</p> <p>The two exceptions to the Key Principles are "Retention and enhancement of locally listed buildings and conservation area" and "A</p>	<p>The Overall Framework (p.22) is a summary discussion of a number of key sites within the town. In this sense it is not "Overall", nor a "Framework", but instead a document that reflects TWBC's decisions taken up to this date. This makes clear the nature of this document to post-hoc rationalise the proposed civic complex development, suggesting that the project's approval has been predetermined in the preparation of this CDPF.</p> <p>We urge the council to postpone the recognition of this document as a SPD until the Local Plan process has been completed.</p>	<p>Existing Town Hall and Assembly Hall (p.34-35): We agree that the existing Town Hall is the "centrepiece of the civic cluster". However, we are concerned by reference within the development parameters to potential future uses "such as office space, academic use, hotel or residential". It is hard to reconcile these future uses (particularly residential and hotel) with two of the documents Key Principles (p.18): "Retention and enhancement of locally listed buildings" and "A strong unified civic identity". Furthermore, it is stated that "it is important for the long-term future of the listed buildings that a viable and sustainable future use is established". If this work is to be undertaken by a new owner then so could it by TWBC, which would have</p>	<p>The CDPF has not been prepared in the context of a masterplan for the borough of Tunbridge Wells. Instead it relates to a small geographic area of the borough in isolation. It is also true that TWBC's current proposals (as often referred to in the document) to re-locate the Town Hall and build a new theatre are at odds with TWBC's Local Plan. Progressing projects of this magnitude by including them in a SPD and subsequently including them in a planning application is premature.</p> <p>Instead we consider the appropriate forum for this development to be considered is through a formal statutory local plan process, rather than non-statutory planning documents, such as this SPD. We urge TWBC to instead postpone the adoption of the CPDF as a SPD until the Local Plan, currently at Issues and Options stage, has been updated</p> <p>By converting the CDPF into a SPD with the intention to use this document to rationalise the Civic Complex project the borough is exposed to unnecessary risk. Major developments should be evaluated with careful reference to their</p>	<p>Comments noted.</p> <p>It is acknowledged that the draft SPD is not a masterplan for the town centre, and is not as extensive as such, since it focuses on a number of what are considered key sites. The document is not intended to be a town centre masterplan.</p> <p>The draft SPD sets out the current policy position in regard to the sites the subject of the document. This includes policy considerations regarding the future use of the existing Town Hall complex.</p> <p>It is not the role or purpose of the draft SPD to set new land use policy. As stated in the document itself the draft SPD has been prepared to supplement existing planning policies and guidance. The intention is that this additional guidance will help shape and influence future development</p>	<p>No specific changes to draft document in addition to those identified.</p>

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		<p>block (to include a Town Hall) on Mount Pleasant Avenue Car Park (MPACP) and an underground car park under Calverley Grounds. By concurrently consulting on the SPD and Five Year Plan TWBC has not approached either consultation with an open mind. This is made particularly clear by inclusion within the Vision and Objectives section to the specific details of the proposed Civic Complex and Theatre project.</p> <p>The CDPF has not been prepared in the context of a Masterplan for the borough of Tunbridge Wells. The Vision and Objectives are also not in agreement with TWBC's Local Plan (2006) and only the MPACP development is supported by TWBC's Site Allocation Plan (2016) for development into offices. Therefore, irrespective of the content of the Vision and Objectives, this document should be granted minimal weight in the council's planning framework. The</p>	<p>strong unified civic identity". The best use for Listed Buildings (as reinforced by comments by Historic England to the council) is their original use, or where that is not possible to be imaginatively and carefully reused. This can still be achieved in agreement with the Key Principles. However, by relocating the theatre and town hall to a new site the existing buildings are left exposed to unnecessary risk for future use. This is made worse by TWBC simultaneously renovating the other part of the existing buildings to create the "cultural hub" on the site of the library, potentially constraining any future use of the existing Town Hall and Assembly Hall. The principles would be enhanced by making reference to these other proposals, which is only made necessary by this document being used to rationalise the civic complex project, rather than viewing development "in the round" by way of a masterplan.</p> <p>Whilst we support the principle of a sustainable future it is clear that the proposed Civic Complex development - by building an underground car park with minimal electric charging points, not providing a traffic management plan for an</p>		<p>a better chance of satisfying the Key Principles. This is particularly so given the proposed cultural hub in the neighbouring buildings as part of the civic cluster. It seems odd to remodel one part of the cluster and retain it for civic use (in accordance with your Key Principles) whereas that part, to which this document relates, is in violation of your own principles.</p> <p>New Office Building and Civic Suite and Car Park (p.40-41): the proposed buildings are in violation of, at least, three of the document's Key Principles:</p> <p>- A well-connected environment – without having prepared a traffic flow plan TWBC cannot know whether the proposals will "improve...ease of movement for pedestrians, cyclists and vehicles". What is clear is that the project will significantly increase traffic in an already heavily congested area with a tight entrance and exit for the car park on to Mount Pleasant Road (causing delays up to the Church Road) and stringent requirements for service vehicles through Hoopers' car park, many of which will be dangerous.</p>	<p>impact on the wider borough which the CDPF, by definition, fails to achieve.</p> <p>It is also not surprising that many respondents to this consultation and this summer's CDPF consultation felt that they were being consulted on the details of the civic complex proposals. These documents make frequent reference to the proposals and were prepared jointly by the project's project manager, GVA, and its architect, Allies + Morrison. A clearer distinction should have been made, particularly after the lesson learnt from this summer's consultation where almost all of the responses were considered irrelevant.</p>	<p>proposals that come forward.</p> <p>The comments are generally directed to the Civic Project proposals themselves and the possible impacts of such a development.</p> <p>Where the comments relate to the Civic project proposals the comments have been forward to the project team for consideration.</p> <p>Any planning applications that may be submitted for proposed development on any of the sites included in the SPD will be considered on merit and will need to demonstrate that the development proposed is acceptable.</p>	

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		document is further evidence of the council retrospectively producing planning documents to rationalise decisions already taken (as in the approval to move the Civic Complex project to the planning stage at Full Council on 6 December).	already heavily congested area and erecting new buildings rather than improving the sustainability of the existing buildings - violates this aim.		<p>- A sustainable future – with minimal electric charging points the car park does not “contribute towards a shift to sustainability”. Furthermore, by building a car park with a 50-year (plus) payback period it suggests that either TWBC is unaware of developments towards driverless cars or is not keen to embrace alternative modes of transport; either way it does not encourage sustainability.</p> <p>- Integration of development within its local context – the character of Calverley Grounds will be fundamentally and irreversibly altered by this project. At twice the height of the current tallest building on the park’s perimeter the proposed buildings will not “integrate well within the surrounding area”.</p> <p>New Theatre (p.42-43): the proposed theatre is in violation of, at least, two of the document’s Key Principles:</p> <p>- A sustainable future – the proposed vehicle servicing movements will significantly increase traffic on Grove Hill Road; coach pick-up and drop-off will increase congestion around the station (with coaches jostling with the to-be-</p>			

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					<p>relocated-to-an-undisclosed-location taxis); and dangerous vehicle movements are proposed in Hoopers' car park during business hours. All of these fail to "contribute towards a shift to sustainability".</p> <p>- Flexible and adaptable space for multi-use and long-term resilience – the proposed theatre is a fixed-seat raked auditorium with a fixed proscenium arch that has been designed to optimise the visitor experience for the current style of musical theatre but offers sub-optimal performance for other genres, in particular for music (classical and contemporary). This not only restricts its use limiting both the range of cultural offerings it can host and its revenue potential, but also would either prevent it from hosting future genres of live entertainment that require different auditorium formats or technology support, or make it possibly prohibitively expensive to do so. In effect, this fixed format musical theatre design renders the theatre vulnerable to early obsolescence rather than long-term resilience. It should be noted that no new-build theatres are being built with such an inflexible performance</p>			



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					<p>space.</p> <p>It should be noted that no new-build theatres are being built with such an inflexible performance space. Sustainability and resilience have both economic and environmental dimensions. When applied to the design of new theatre space, these principles require the greatest possible flexibility in the use of both the audience seating and the performance space to accommodate the widest range of events, whether theatrical, corporate or community in nature. A fixed raked auditorium and a fixed performance area framed by a proscenium arch, do not meet these requirements; they would reduce revenue potential threatening economic sustainability, limit potential to accommodate future changes in demand hastening obsolescence by virtue of the limited designed-in resilience. Moreover the size of, and facilities provided within any new theatre that has aspirations to support community interests must be able to accommodate the smaller audiences and wide range of performance genres that such events will attract without losing the intimacy so vital between audience and performers.</p>			

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					<p>The economic sustainability of most theatres depends in large measure on their F&amp;B offering. Theatres with little or no F&amp;B revenue will inevitably be less economically resilient than those with such revenues.</p> <p>Environmental sustainability requires optimal efficiency of core systems, in particular those with a high energy consumption. This requires close attention to the design of the service areas of the theatre to ensure a minimal requirement for vehicle movements, efficient provision of refuse handling, and loading and unloading procedures, refrigeration units, twin-pack trailer-mounted generator sets, satellite uplink vehicles, scanners, tenders, OB trucks as well as new technology not yet contemplated that will become necessary in the future. Moreover, all these services must be provided in ways that minimise noise pollution, particularly at anti-social hours when a legally enforceable curfew is likely to prohibit any significant activity. Delivering environmental sustainability for these services requires ample physical space in which they can be undertaken.</p>			

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<a href="#">CDPF_32</a>	Elizabeth Guthrie & William Hall					<p>The Civic Development Framework has not been prepared in the context of a Masterplan for Tunbridge Wells. The text provides justification retrospectively for decisions made by the Council in respect of the Civic Centre, Crescent Road / Church Road, Mount Pleasant Car Park and Great Hall Car Park. It claims to offer guidance for planning when the major projects for the new Council and speculative offices and new theatre are at an advanced stage, and the decision has now been taken to proceed.</p> <ol style="list-style-type: none"> <li>2. This overall framework is not a true framework and not overall. It is not an overview of the town or the town centre because it focuses on a few sites for which the Council has predetermined decisions.</li> <li>3. The document includes uses for Calverley Grounds and the Great Hall Car Park that were not identified in the Site Allocations Local Plan (2016).</li> <li>4. The description on page 8 obscures the fact that the buildings comprising the Civic Complex are all nationally important Listed Buildings to which the Council has a duty of care both as owner occupier and planning authority.</li> <li>5. The proposal that new development in the existing Civic Complex area should include an extra 15,000 square metres of retail space is made without reference to the increase in retail space being provided on the former cinema site and in the expansion of RVP. These developments must call into question the need for extra retail in the areas covered by the draft SPD and it is not</li> </ol>	<p>Comments noted.</p> <p>The draft SPD sets out the current policy position in regard to the sites the subject of the document. This includes policy considerations regarding the future use of the existing Town Hall complex.</p> <p>It is not the role or purpose of the draft SPD to set new land use policy. As stated in the document itself the draft SPD has been prepared to supplement existing planning policies and guidance. The intention is that this additional guidance will help shape and influence future development proposals that come forward.</p> <p>Many of the comments are generally directed to the Civic Project proposals themselves and the possible impacts of such a development.</p> <p>Where the comments relate to the Civic project proposals the comments have been forward to the project team for consideration.</p> <p>It is acknowledged that the draft SPD is not a masterplan for the town centre, and is not as extensive as such, since it focuses on a number of what are considered key sites. The document is not intended to be a town centre masterplan.</p> <p>Any planning applications that may be submitted for proposed development on any of the sites included in the SPD will be considered on merit and will need to</p>	No specific changes to draft document in addition to those identified.

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						<p>clear where such retail use could be located.</p> <p>6. The Site Allocations Local Plan did not include a theatre on the Great Hall car park site nor an underground car park in Calverley grounds.</p> <p>7. A Masterplan should be developed first. The site allocations, decisions about the Theatre and Council Offices and other town centre improvements should follow in the context of the plan and not be predetermined by piecemeal decisions.</p> <p>8. The imposition of large scale structures on the western perimeter of Calverley Gardens does not respect Decimus Burton's design for views across a rural park to a wider landscape, that still survive due to tree cover. The adverse impact is clearly seen in the before and after images in the document where the new buildings dominate the view and will become increasingly dominant as the western boundary is approached.</p> <p>9. The SPD repeatedly seeks to justify predetermined decisions taken by the Council. This is not the purpose of SPDs set in Planning Legislation and guidance. They are for setting out supplemental standards (NPPF clause 153).</p> <p>10. Page 26 is full of vague promises: the traffic/pedestrian/public realm uses should have been completed with KCC Highways consultation as part of a Masterplan for the town centre.</p> <p>11. The SPD document is also not supported by fully formulated appraisals of Landscape/Townscape Impact</p>	demonstrate that the development proposed is acceptable.	

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						<p>or Transport Impact.</p> <p>12. A “sustainable future” is not one where increasingly scarce resources are used in preference to remodelling existing assets. The retention and enhancement of the existing Listed Buildings within the conservation area is the responsibility of TWBC as Local Planning Authority and user of the buildings: this includes options that are not addressed by current proposals for a new theatre and Council offices.</p> <p>13. The best use for Listed Buildings is their original use and where this is not possible then imaginative and reuse and adaptation is accepted: positive change is not guaranteed by the SPD. Indeed, the Council’s plans put the Listed Buildings at risk.</p> <p>14. “Cohesive identity” is best achieved by adapting the listed Civic Complex as one, not splitting off Council office functions and Assembly Hall to another site leaving community use of the offices and Assembly Hall at risk of redevelopment by an unknown developer for an unknown purpose. The Council has a duty of care.</p> <p>15. The existing group of buildings is the Civic Heart of RTW and requires imaginative and constructive patronage.</p> <p>16. A “well connected environment” is a praiseworthy aim but interrupting pedestrian and general traffic by the introduction of frequent HGV, coach and small vehicle movements into a restricted junction to serve the new Civic Suite and Theatre interferes with movement and natural connections. It will also prevent</p>		

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						<p>effective improvement of the High Street/Grove Hill Road junction proposed by the Council's own planning document prepared by its in-house Architect (Royal Tunbridge Wells Public Realm Framework 2015).</p> <p>17. Intensification of use without adequate consideration and preparation a traffic management plan for the whole town centre is irresponsible.</p> <p>18. There is no doubt that the infrastructure and public realm of Tunbridge Wells requires investment, but this should come from a deep understanding of the character and needs of the town. The use of a SPD to justify designs developed in isolation from the rest of the town threatens the character of the civic core of the town and Calverley Gardens without solving problematic vehicle and pedestrian circulation.</p> <p>19. To achieve an inclusive sustainable vibrant and successful town a Masterplan is required within which the infrastructure, environment and the cultural and economic life of Royal Tunbridge Wells can be properly addressed.</p> <p><b>THE EXISTING ADMINISTRATIVE AND CULTURAL HUB, CALVERLEY TERRACE AND CRESCENT ROAD.</b></p> <p>20. The SPD proposes partial remodelling of existing buildings as a positive aim, and proposes nothing that cannot be achieved proper design and planning of rehabilitation of the existing buildings, much of the poor condition being due to the Council's neglect of its</p>		

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						<p>responsibility towards listed buildings in its care.</p> <p>21. Civic Way is a public space linking pedestrian routes notably to the new cultural hub and should not be privatised. A stated aim is connectivity not gated privacy.</p> <p>22. Page 35 includes comment on viable sustainable futures based on adaptation. This concept should include a thorough assessment of the economics of the reuse of the existing buildings. If the Council is relying on a new owner undertaking this work, then so could the Council which has a previously commissioned report (BDP) supporting the concept. Reuse of the Council Offices may include “Public realm improvements” but will be compromised by limiting access to the “edge of the Building”.</p> <p>23. There is no guarantee of an acceptable use once these premises are sold in the market. A new owner may seek a different use to that agreed, and this will hardly be new Council Offices and Theatre. The town may well face a repeat of the cinema site fiasco.</p> <p>24. Through all this the Art Gallery/Museum /Library/Education hub is a perfect example of what can be achieved by consultation, imagination, skilled design and intervention in Listed Buildings. The existing Cultural Hub would be enhanced by a similar approach and a link to remodelled Assembly Hall Council Chamber and Council Offices.</p> <p><b>THE NEW OFFICE BUILDING, CIVIC SUITE, UNDERGROUND CAR PARK,</b></p>		



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						<p><b>AND NEW THEATRE.</b></p> <p>25. Whilst the proposed new office building is shown as allocated in the Site Allocations Local Plan (2016), the proposed new Civic Suite and Theatre are not. Notwithstanding, the Council has now determined to proceed with this proposed development, for which a planning application will be lodged early in 2018, with a detailed scheme now in the public domain.</p> <p>26. This SPD therefore bears little credence in respect of this proposed development, the decision to proceed with a detailed scheme has already been taken.</p> <p>27. There are concerns in respect of;</p> <p>28. Harm to designated Historic Park, Area of Landscape Importance, Arcadian Area, and 'Significance' of the Conservation Area.</p> <p>29. Highways safety and proposed access strategy and arrangement.</p> <p>30. The access to the main underground car park.</p> <p>31. The civic entrance way.</p> <p>32. The limited design and flexibility of the proposed new Theatre.</p> <p>33. The materially harmful impact on Hoopers store with threat of closure.</p> <p>34. The unworkable theatre access and servicing arrangements.</p> <p><b>HARM TO HISTORIC PARK, AREA OF LANDSCAPE IMPORTANCE, ARCADIAN AREA, AND SIGNIFICANCE OF THE CONSERVATION AREA.</b></p> <p>28. Calverley Grounds lies adjacent to a busy part of Tunbridge Wells Town Centre immediately east of the busy Mount Pleasant</p>		

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						<p>Road and its shopping centre and Central Station.</p> <p>29. Immediately to the east lies the sylvan Decimus Burton's Calverley Park.</p> <p>30. Calverley Grounds displays a central valley running between Mount Pleasant and Calverley grounds, flanked by mature tree cover, with the Calverley Hotel on its northern side and the residential cut de sacs off Grove Hill Road to the south.</p> <p>31. The original plan of Calverley Grounds envisaged a landscaped enclosure on its western edge from the town centre, and physical separation on its borders from built development by planting on its borders. The recent Great Hall Car Park on its western edge represents a hard physical intrusion on this character.</p> <p>32. The Grounds are an attractive and well used landscaped open space in a busy town centre, and provides relief to the generally busy urban uses and character on its western boundary.</p> <p>33. The western entrance from Mount Pleasant Avenue is somewhat inauspicious, but is capable of beneficial enhancement as a gateway to the grounds with not excessive cost, and in a manner that would enhance the character and attraction of the grounds, as shown in the Council's Tunbridge Wells Public Realm Framework 2015.</p> <p>34. The Grounds lie within the Tunbridge Wells Conservation Area, a designated Historic Park, an Area of Local Landscape Importance, and an Arcadian Area, to which adopted and protective Planning</p>		

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						<p>Policies EN5 (Conservation Areas), EN11 (Historic Park or Garden) and EN21 (Area of Important Open Space) apply.</p> <p>35. Critically, the terms of Section 12; Conserving and Enhancing the Historic Environment of the National Planning Policy Framework emphasizes the need to assess the significance of heritage assets that may be affected by proposed development, which should not be harmed but enhanced.</p> <p>36. Against this overruling requirement and adopted Policy framework the SPD provides no such heritage or contextual appraisal to justify a proposed development of the new office building, Civic Suite and new theatre, as it admitted in the Stage 3 Report that such an appraisal has not been carried out.</p> <p>37. The proposed new buildings are large, and will dominate the western edge and Historic Park generally.</p> <p>38. This is not a question of whether the new development will take only 2% of land within the Park. It is a question of how this development, with its large community, public and commercial buildings will radically change the character, appearance and general ambience of the Calverley Grounds, with commercialization, urbanization, general activity, hard built form and lighting. This is contrary to the original concept for this Historic Park, the Area of Local Landscape Importance, Arcadian Area, the above Adopted Planning Policies, and harm materially the 'significance' of this part of the</p>		

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						<p>Conservation Area.</p> <p><b>HIGHWAYS SAFETY AND PROPOSED ACCESS STRATEGY AND ARRANGEMENT</b></p> <p>39. There must be concerns about the impact of the proposed new development on traffic flows and pedestrian and highways safety on adjacent roads.</p> <p>40. It is incumbent upon the Borough Council to ensure that the proposed development, which will generate significant amounts of traffic movement, will not have materially harmful impacts on implications for highways and pedestrian safety, sustainability, and traffic congestion.</p> <p>41. In this regard it is incumbent on the Borough Council to ensure that these issues are addressed in full and properly formulated Transport Statement or Transport Assessment.</p> <p>42. This requirement is found in the following National and Development Plan Policy;</p> <p>43. The National Planning Policy Framework (2012), as follows;</p> <p><i>All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:</i></p> <p><i>the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;</i></p> <p><i>safe and suitable access to the site can be achieved for all people; and improvements can be undertaken within the transport network that cost</i></p>		

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						<p><i>effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.</i></p> <p>(Para 32).</p> <p>1. Tunbridge Wells Borough Core Policy 3: Transport Infrastructure; as follows;</p> <p><i>To address transport issues and provide necessary infrastructure:</i></p> <p><i>Development proposals that have significant transport implications will be required to be accompanied by a transport assessment and travel plan showing how car based travel can be minimised.</i></p> <p>1. Saved 2006 Local Plan Policy TP1, as follows;</p> <p><i>Proposals for large-scale non-residential development will be required to be accompanied by a Transport Assessment and a Travel Plan to demonstrate the adequacy of transport infrastructure to serve the development.</i></p> <p>43. Notwithstanding the above, it should be noted that the 'Stage 3; Tunbridge Wells Civic Development Report confirms that;</p> <p>44. A properly researched and formulated Transport Statement/Assessment has not been prepared to support this proposed development.</p> <p>45. The access and servicing strategy has been 'discussed with both TWBC and KCC officers' (para 7.4.20).</p> <p>46. Kent County Council Highways</p>		

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						<p>remain concerned about the;</p> <ul style="list-style-type: none"> <li>▪ ‘shared space between the buildings, and particularly the interaction between vehicles and pedestrians.</li> <li>▪ The potential for conflict between vehicles travelling in opposite directions to and from the new car park, via Mount Pleasant Avenue.</li> <li>▪ The impact of traffic flows on Grove Hill Road.</li> <li>▪ The impact of service vehicles using Hoopers service yard on the residents of Grove Hill House.</li> </ul> <p>(Paras 7.4.20-7.4.23).</p> <p>44. The lack of these necessary appraisals, which should pre-determine the access strategy for this proposed development to ensure that it can be accommodated within the existing highways network and traffic flows without material harm to highway and pedestrian safety, and within the capacity of local highways infrastructure, calls into question the effectiveness and safety of these proposals in access and highways terms.</p> <p><b>THE ACCESS TO THE MAIN UNDERGROUND CAR PARK.</b></p> <p>45. The proposed access from half way down Mount Pleasant Road to the new underground car park (261 vehicles) has inherent flaws, in that;</p> <p>46. The visibility of the access to Mount Pleasant Road is limited, and will be interrupted by pedestrian flows.</p>		

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						<p>47. Traffic flows from this narrow road has the potential to choke traffic on both sides of Mount Pleasant Road to and beyond its junctions with Church Road and Grove Hill Road/Vale Avenue/High Street. This prospect remains untested by way of traffic flow analysis and junction design. The potential for increased traffic congestion is untested but high.</p> <p>48. Mount Pleasant Avenue is steep and narrow, and may not have the capacity or design capacity to serve this car park efficiently and safely. The car park entrance is angled such that traffic enters from a dog leg down Mount Pleasant Avenue and into the car park entrance, and with what appears a tight vehicular manoeuvre. There may be a requirement for third party land to facilitate this access arrangement.</p> <p>49. Mount Pleasant Avenue will also continue to serve the rear access requirements of the frontage retail, office and residential properties, and the service requirements for the new office block and Civic Centre, which will lead to conflict in traffic flows.</p> <p><b>THE CIVIC ENTRANCE WAY.</b></p> <p>46. The main entrance to Calverley Grounds and the new Theatre, Civic Centre and Offices will be from Mount Pleasant, alongside the Great Hall, which access is shared with the properties in the Great Hall and Sainsbury's store, as well as the busy Taxi Rank.</p> <p>47. This, as the key 'civic' entrance, has the potential to be a complicated and unsafe mix of</p>		



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						<p>heavy pedestrian flow mixed with heavy vehicular service traffic. Kent County Highways has every right to be concerned at the highways safety issue.</p> <p>48. The issue of servicing the premises in the Great Hall, Sainsburys, and the Mount Pleasant Properties remains unresolved.</p> <p>49. The potential for unacceptable traffic congestion at this junction with Mount Pleasant Road, opposite a busy central main line station, and with its busy taxi ranks is high.</p> <p><b>THE VISUAL IMPACT, LIMITED DESIGN AND FLEXIBILITY OF THE PROPOSED NEW THEATRE.</b></p> <p>The proposed new Theatre, in plans seen in the public domain and which have influenced the Council's decision to proceed, is large, particularly with its functional tower, and will have a material impact on the character, appearance and functioning of Calverley Grounds.</p> <p>Representation to date have emphasised the fixed inflexibility of its design and layout to accommodate a range of modern uses and artistic enterprises.</p> <p>The Theatre will also have a material impact on the residential amenity of the residents of Grove Hill House apartments immediately alongside, by its overdominance, and noise and disturbance from its traffic and servicing arrangements.</p> <p><b>MATERIALLY HARMFUL IMPACT ON HOOPERS STORE WITH THREAT OF CLOSURE.</b></p> <p>50. The access strategy has the potential to close Hoopers store,</p>		

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						<p>which is the main retail attraction in this key location between the upper and lower parts of the town centre.</p> <p>51. The Stage 3 report confirms that; a. <i>Perhaps the biggest risk to the access strategy is the absence of an agreement between TWBC and Hoopers for vehicles to service the site via Hoopers service yard and car park. Notwithstanding an agreement between the two parties, TWBC remain concerned about the impact of HGV's accessing the site via Hoopers service yard and car park (and noise impacts on residents in Grove Hill House) and KCC remain concerned about the impact of increased traffic flows on Grove Hill Road'</i> (para 7.4.21).</p> <p>52. Hoopers object to this proposed development, as set out in their recent press statement, as follows, and have confirmed that they will continue to object to any planning application and Compulsory Purchase Order;</p> <p><i>Since the Council published its plans for a new theatre development on the site of the Great Hall car park, Hoopers has been inundated with enquiries from customers, staff and the general public for its views on the proposal and the possible impact on its business. Whilst Hoopers is extremely supportive of the concept of a new theatre in town, it has fundamental concerns with the site of the proposal with its overwhelming reliance on access through Hoopers customer car park and delivery service area in order to achieve long term operational viability. The threat of a compulsory purchase order on the customer car park to achieve this access will have a potentially devastating effect on Hoopers ability to</i></p>		

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						<p><i>function effectively. Hoopers believes that if the council's planned access route comes to fruition, it would create an existential threat to the current operation and viability of an iconic independent retail business, affecting not only the store in Tunbridge Wells but the operation of its three other stores in the group that rely upon services from this store. The group itself provides employment for over 500 people of which 170 are based in Tunbridge Wells. Hoopers considers the design of the theatre should be capable of including the requisite access arrangements within the site and the existing street layout without threatening the viability of a significant local business and major retail employer.</i></p> <p><i>Hoopers has detailed its concerns to the representatives of TWBC.</i></p> <p>53. The proposed servicing arrangements for the Theatre and the new Civic Centre, both of which would use Hoopers car park, will have a material and unacceptable impact on the use of Hoopers store and car park and its business.</p> <p>54. The car park, which is not a through route and has a barrier control, is in continuous use and is essential to the viable operation of the store, both as a customer car park and for essential loading/unloading.</p> <p>55. The car park is essential to the trading attraction of Hoppers store for customers and for storage and servicing.</p> <p>56. The use of the car park as proposed to serve both the theatre and new Council Offices for service vehicles, with an unacceptable risk of accidents to people and parked cars, would impede present servicing</p>		

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						<p>arrangements (for which the proposals take no account) and result in the loss of parking spaces. It would be a threat to health and safety, and would overwhelm and prevent the use of this car park by Hoppers store.</p> <p>57. This access and car park cannot be relocated.</p> <p>58. The loss of this car park would jeopardise the viability of Hoopers' business, with potential closure of the store, the loss of the retail floorspace and jobs.</p> <p><b>UNWORKABLE THEATRE ACCESS AND SERVICING ARRANGEMENTS.</b></p> <p>59. Access through this car park by large theatre service vehicles cannot be achieved safely onto Grove Hill Road. This would require the unacceptable widening of the car park entrance (from 5.5 to 12 metres?), without providing the necessary highways vision splays, with large vehicles would having to cross over and occupy both carriageways whilst exiting, with major and dangerous interruptions to already heavy traffic flows on Grove Hill Road, and traffic having to back up and down Grove Hill Road, and onto Mount Pleasant Road, Vale Avenue and the High Street. This will also cause interruptions and hazards to pedestrian use of the adjacent pavements.</p> <p>60. The loss of the existing car park barrier will also result in the loss of control by Hoopers of its car park.</p> <p>61. There will be inadequate access provision to the proposed</p>		

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						<p>theatre for large service vehicles.</p> <p>62. The proposed siting of the new theatre will impede its proper servicing by large service vehicles, and as proposed is unsafe and unworkable.</p> <p>63. Vehicle tracking and swept path analysis has shown that the tight configuration of the proposed Theatre buildings and service access is tight and without tolerance, and will impede the manoeuvring of large fully laden service vehicles within the proposed service routes, and likely servicing by large theatre service lorries will have no room for movement, if any at all, and will block the service routes.</p> <p>64. Reversing of such vehicles into Hoopers car park, where there is an existing levels difference, cannot be achieved safely and without risk to retail customers and staff.</p> <p>65. Theatre service vehicles will not be able to unload from the side, or rear, as the proposed space for servicing is too tight.</p> <p>66. Proposed overnight servicing by large vehicles should not be allowed as being inimical to the residential amenity of the immediate residential neighbours of Grove Hill House, whose residential habitable room windows and balconies immediately adjoin and overlook the proposed service yards and roads. As such there must be a curfew on servicing and deliveries outside of normal offices hours, and particularly overnight.</p> <p>67. Were an access to Grove Hill Road to be achieved there is the prospect of materially increased and unacceptable</p>		

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						<p>levels of traffic congestion from the entrance, up Grove Hill Road, and its junctions with Mount Pleasant Road/ Vale Road/ High Street.</p> <p>68. The material concerns of the Kent Highways Authority should be noted.</p>		
<a href="#">CDPF 33</a>	RTW Town Forum (Strategic Planning Working Group)					I regret that on this occasion there was insufficient resource in the Working Group to expand on comments made by the Town Forum on an earlier draft.	Noted	No change to draft document.
<a href="#">CDPF 34</a>	Historic England					<p>Thank you for providing Historic England with this opportunity to comment on this draft SPF Planning Framework. Overall we think this is a good document which should assist in achieving sustainable solutions appropriate to the historic significance of this part of Tunbridge Wells.</p> <p>We are currently providing your Council with pre-application advice about the proposed new civic buildings at Calverley Grounds and for the future of the existing listed civic buildings. These are important issues within the draft document but we note that the area covered in the consultation draft is more extensive. We are pleased to note on page 12 that a master plan for the civic buildings should be informed by a conservation statement. We think this could be reinforced by adding that this should lead to a historic significance led proposal for master planning. Any additional conservation statement for master planning should build on the 2013 Conservation Statement (Architectural History Practice) for the listed buildings and make use of the Conservation Area appraisal. The 2013 document should be referenced in the framework.</p>	<p>Comments noted.</p> <p>Pages 12 and 13 of the draft SPD quote existing policy wording taken from the adopted Site Allocations Plan 2016. The importance of heritage considerations in influencing development proposals and the determination of associated planning applications is recognised in the SPD.</p> <p>Revised / additional wording to draft SPD considered.</p>	<p>Changes made to draft SPD</p> <p>Add at Paragraph 3 Page 29:</p> <p><b>“In identifying agreed uses due consideration will be given to those that are least harmful to the historic significance of the buildings.”</b></p> <p>Paragraph 2 Page 35, amend to read :</p> <p><b>“It is important for the long term future of the listed buildings that proposals provide for and secure the optimum viable use of the buildings.”</b></p> <p>Add to Paragraph 4 Page 35:</p> <p><b>“ In proposing potential uses proposals must</b></p>

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						<p>We think some greater clarity would help about potential continued use of parts of the existing civic buildings for civic uses (bullet point end of page 12 and top of 13). This will need to be explored further in the draft brief for potentially acceptable new purposes for the listed civic buildings and in particular whether the Council Chamber there is to be retained.</p> <p>For the Public Realm section (page 24 onwards) we specifically welcome the commitment to improvements which have the potential to enhance the setting of the listed buildings, especially 9-10 Calverley Road. The latter pair of villas is all that now remains of the Decimus Burton designed houses that preceded the 1930s civic buildings. They deserve a setting more sympathetic to their historic residential origins.</p> <p>Page 29 (under Land Use) the framework notes possible alternative uses for the listed civic buildings which are wide ranging. At this stage we think this is acceptable as we do not wish to discourage innovative re-use of these buildings should their civic purpose now cease, but we do think it worth adding that agreed uses should look for those that are least harmful to historic significance. Viability will also be a consideration and the draft brief for the future of the Town Hall and Assembly Hall (September 2017) could be referenced as helping to establish the parameters for potential acceptable change.</p> <p>For section 4.1 (page 34) and under the three bullet points of the Objectives we think it would be better in the first to refer to sustaining or revealing aspects of the significance of the listed civic buildings and not to reference retaining historic fabric. It may be that some fabric is capable of being lost or</p>		<p><b>demonstrate an understanding of how these uses might impact on the significance of the buildings.”</b></p> <p>Paragraph 7 page 35 : delete last part of sentence and wording;</p> <p><b>“and private landscaped garden space replacing Civic Way”.</b></p>



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						<p>changed without any real harm to the significance of the building and we would not want the framework to suggest this may not be acceptable.</p> <p>Page 35 picks up the above theme and we think it will be better to phrase para 2 using the language of the NPPF which is that proposals should seek to secure the optimum viable use of the building. The optimum use might be the one that best conserves the significance of the heritage assets and this may not be the one that is most viable in financial terms alone. Para 4 on page 35 provides the opportunity to include that potential uses must be subject to understanding how these might impact on significance and may be a place to reference the September 2017 brief for the Town Hall and Assembly Hall.</p> <p>Para 7 on page 35 contains the suggestion that under any residential re-use of the existing civic buildings, private landscaped garden space might replace Civic Way.</p> <p>We disagree that this is an acceptable possibility and think that it should not be included. We think this might fundamentally alter an appreciation of the listed building character which needs to remains very civic all the while it is surrounded by public space. The setting of the listed war memorial is also a consideration and we support the concept of an enhanced public realm for the land in front of the civic buildings at both the upper and lower levels.</p> <p>Section 4.2 covers the Cultural and Learning Hub in the current library and museum building. We provided pre-application advice and are about to respond on the planning and listed building consent applications. We can support the content of the framework</p>		

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						<p>and we agree that action would be needed to prevent this cultural offer from feeling divorced from any new buildings at Calverley Ground.</p> <p>For section 4.3 and the Police Station and Magistrates Court we acknowledge the separate ownership but also the potential advantages of bringing this listed building under consideration as part of the future of the other civic buildings which it was designed to be part of. A brief to guide the future use and treatment of this listed building would seem appropriate to add to or complement that prepared for the Town Hall and Assembly Hall. We acknowledge that the future of the court room is likely to be a key issue and decisions should be based on a firm understanding of its historic significance. Many such historic courts are now falling out of use and Historic England may have experience and expertise to share with regard to future acceptable re-use of this listed building</p> <p>Section 4.4 covers 9-10 Calverley Terrace and as referenced above we think the framework should encourage future use in ways which address their historic significance as former historic houses. This does not mean that only a residential use is possible but it is the character of these as homes that we think is important, including the contribution made by what would have been their gardens in forming the setting of the listed buildings.</p> <p>Section 4.5 covers Crescent Road and we agree that there is the potential to enhance the character and appearance of this part of the conservation area, including by means to screen the bulky unattractive appearance of the multi storey car park. The setting of the listed Calverley Park Terrace will be of concern as will be the future of the unlisted buildings on the opposite side of the road. The conservation area</p>		

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						<p>appraisal will be important to understanding what contribution the heritage assets make to the character and appearance of this part of the conservation area and how this might be preserved or enhanced by change.</p> <p>Section 4.6 and 4.7 cover the new civic offices (with car park) and the new theatre.</p> <p>Here we think the framework needs to reference both the character and appearance of the conservation area and the grade II registered park and garden at Calverley Grounds. The NPPF contains advice for such designated heritage assets and this could be made more specific to this location. We think that the need to preserve and enhance the significance of the heritage assets must inform proposals and paras 131, 137 and 138 of the NPPF appear to us most relevant, especially with regard to the conservation area.</p> <p>I hope that these comments on the draft SPD are useful to you and we would be pleased to answer any questions or to provide any further clarification that you may require.</p>		
<a href="#">CDPF_35</a>	Lambert Smith Hampton for Hoopers Department Store				We have been instructed by the owners of Hoopers Department Store ("Hoopers") to prepare this submission in response to the consultation of the <i>Tunbridge Wells Civic Development Framework – draft Supplemental Planning Document</i> (the "Draft CPD") published by Tunbridge Wells Borough Council (the "Council"). Hoopers Department Store is located on the corner of Mount Pleasant		<p>Comments noted.</p> <p>This response is on behalf of an adjacent landowner / retail business. Given the location it understandable focuses on the possible implications for the existing store in terms of access and servicing.</p> <p>As such the comments are generally directed to the Civic Project proposals themselves and the possible impacts of such a development.</p> <p>Where the comments relate to</p>	No specific changes to draft document in addition to those identified.

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					<p>Road and Grove Hill Road and has been included within Draft SPD study area.</p> <p>The department store was originally established over 100 years ago and has been trading in its current configuration as Hoopers since 1982. The property comprises the existing four storey department store and the dedicated customer car park and service yard to the east of the store, with access to the car park from Grove Hill Road and a secondary access/exit via the service road to the rear of Great Hall Arcade. Access to the car park is controlled by barriers. The main goods in loading bay to the store is located in the north west corner of the car park.</p> <p>While Hoopers have no objection to the principle of the civic developments being proposed in the Draft SPD, they have serious concerns over the nature of the access and servicing route to the Council's proposed new theatre which currently requires use of Hoopers' privately owned car park land for delivery, servicing and refuse collection associated with the operation of the theatre.</p> <p>Furthermore the proposed arrangement is likely to result in service vehicles to 14-18 Mount Pleasant</p>		<p>the Civic project proposals the comments have been forward to the project team for consideration.</p> <p>Any planning applications that may be submitted for proposed development on any of the sites included in the SPD will need to demonstrate that the relevant development can be satisfactorily accessed and serviced.</p>	

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					<p>Road and the Great Hall Arcade needing to use the Hoopers car park route as well, and there is no obvious means of controlling this traffic.</p> <p><b>Draft SPD proposals directly affecting Hoopers Department Store</b></p> <p>Page 26 of the Draft SPD states under ‘Vehicular Movement’ the following:</p> <p><i>“Mount Pleasant Avenue will need to remain in use as a service route to maintain access to a number of buildings. Similarly, the servicing of the new theatre will require access from the bottom of Mount Pleasant Avenue around the back of the Great Hall and connecting with the service area of Hoopers Department Store.”</i></p> <p>This proposed servicing access route is indicated on Fig 4 (Public Realm). Section 4.7 provides limited details on the ‘New Theatre’ proposed to be located on Great Hall car park site. Included within the objectives for the New Theatre is “<i>to ensure ease of movement around the site for service and emergency vehicles</i>”. The draft SPD further states “<i>Servicing should be established on the yard to the south of the building with access from the north via the shared space and</i></p>			

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					<p><i>existing to the south onto Grove Hill Road”.</i></p> <p>The Draft SPD states at page 46 that the Council will “<i>continue to work and engage with stakeholders including the local community, businesses, landowners, residents and statutory consultees to progress the delivery of each site including through the planning application process</i>”. However, it goes on to state:</p> <p><i>“Where possible the Council is bringing forward its own land for development. Where required, the Council will use its statutory powers including compulsory purchase powers to facilitate comprehensive development and delivery of the sites in order to deliver the policy framework for Tunbridge Wells.”</i></p> <p>On the basis that the proposed access route for servicing through the Hoopers car parking is in private ownership, in the absence of such arrangements being agreed, it is clear from the Draft SPD that the Council would need to exercise compulsory purchase powers.</p> <p><b>Objections to the proposed servicing of the new Theatre</b></p>			

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					<p>The current car park is essential to the viable operation of the department store and fulfils two primary functions, firstly as a customer car park and secondly for access to the store for loading and unloading. The car park is in continuous use throughout store trading hours and the convenience to customers is a very important aspect of the store's offer.</p> <p>The car park is not a through route, but is a barrier-controlled environment which prevents overcrowding – access is only possible when spaces are available. The proposed use of this area for transiting HGVs and other large vehicles is incompatible with this use, and would present a serious and substantial health and safety risk to store customers and staff.</p> <p>The proposed access route(s) pass close to store entrances/exits and to parking bays, and the elevated risk of accidents to both people and parked cars would not be acceptable. In addition, responsibility for managing and insuring shared use of a private area would present significant management issues and additional cost to the business.</p>			



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					<p>Any adverse effect on use of the car park by Hoopers' customers will result in fewer customers visiting the site, and any loss of trade could jeopardise the entire business.</p> <p>1. Vitality and viability of Hoopers business</p> <p>The proposed scheme will harm the vitality and viability of Hooper's business and the proposal presents an unacceptable increased level of risk in respect to the safe movement of vehicles and pedestrians both on the site and around it.</p> <p>All deliveries of stock to the store are made to the service access in the north east corner of the building. The goods lift to all floors is adjacent to this access. The proposed access through the car park would conflict directly with the existing service arrangements and would not be possible while deliveries to/from the current service access are taking place.</p> <p>The proposed access route for theatre vehicles, either in the form of access rights or by freehold acquisition, would effectively prevent use of the current service access to the store. Relocating this access would require significant</p>			

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					<p>internal re-configuration of the store and the relocation of the goods lift causing substantial disruption, inconvenience, and expense. Any consequent loss of part of the existing trade could jeopardise the viability of the business as a whole.</p> <p>Under the heading 'Retail and Leisure', paragraph 2.22 of the Tunbridge Wells Core Strategy Development Plan Document notes that despite Royal Tunbridge Wells being an important retail centre, the town has dropped out of the top 50 retail centres since 2004 and notes that the Council should avoid any negative impacts that may affect or harm the vitality and viability of the Borough's town centres.</p> <p>The National Planning Policy Framework (NPPF) also makes clear under Policy 2 'Ensuring the vitality of town centres' that in assessing town centre development proposals, Planning authorities should assess the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area.</p> <p>2. Safe movement of vehicles and pedestrians</p> <p>The Council's proposed</p>			

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					<p>servicing strategy suggests that following construction of the theatre, delivery, service and refuse vehicles will use Hoopers' car parking land. This proposal contravenes the normal practice for retail and leisure development, in which customer parking and service deliveries are usually separated in the interests of safety.</p> <p>Hoopers' appointed Transport Planning consultants (ADL Traffic and Highways Engineering Ltd) have undertaken a detailed assessment of the Council's proposal and their report (enclosed with this submission) concludes firmly that the proposal is not feasible.</p> <p>The report confirms through swept path analysis that the service access proposed to the rear of Great Hall Arcade is not large enough to accommodate the theatre's delivery vehicles, therefore the proposal fails against basic safety requirements in respect to the safe movement of vehicles and pedestrians.</p> <p>Paragraph 4.3 of ADL Traffic and Highway Engineering's report points out that the swept path analysis shown by Vectos (on behalf of the Council) demonstrates</p>			

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					<p>that there is no space for pedestrians to seek refuge if a vehicle is using the route via Hooper's car park to/from the stage door. This would result in a range of problems including vehicles backing up onto the highway network while waiting for pedestrians to pass.</p> <p>The report also notes that the proposed manoeuvring of trailers (with vehicle reverse beeping and the associated unloading of goods etc) onto the dock loading area will also create noise nuisances and disturbance for residents of properties on Mount Pleasant Avenue.</p> <p>This is unacceptable in amenity terms.</p> <p><b>Conclusion</b></p> <p>The proposal would result in an unacceptable, unsafe arrangement for the movement of delivery, service and refuse vehicles over Hooper's private land.</p> <p>The land presently provides car parking used by Hoopers' customers and has a secondary use for the loading and unloading of goods for the store. Any net loss of car parking and servicing space here will result in fewer customers being able to park and visit the store, therefore resulting</p>			

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<b>Comment Number</b>	<b>Name/ Organisation</b>	<b>Question 1 - comments on the Vision and Objectives</b>	<b>Question 2 - comments on the Key Principles</b>	<b>Question 3 - comments on the proposed urban framework and public realm framework</b>	<b>Question 4 - comments on the key sites</b>	<b>Question 5 - any other comments on the consultation draft Supplementary Planning Document:</b>	<b>TWBC Response</b>	<b>TWBC Recommendation, including further revisions where considered appropriate.</b>
					<p>in the loss of business/revenue to the detriment of the vitality and viability of this existing business and to the town centre.</p> <p>The proposal would also create unacceptable levels of noise nuisance and disturbance to the detriment of residential amenity for occupiers at Mount Pleasant Avenue.</p> <p>Hoopers have no objection to the concept of a theatre development on the identified site, but consider that such development should not be at the expense of the Hoopers' business. The design of the theatre project should be such that it is capable of including the requisite access arrangements within the site and the existing street layout without threatening the viability of a significant local business and major retail employer.</p> <p>The SPD as drafted puts forward proposals which are not viable, and which will cause an unacceptable impact on Hoopers. No evidence is available that alternative access arrangements which have less impact on a significant local retailer have been considered.</p> <p>The current proposals necessitate the use of privately owned land, and</p>			

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					<p>implementation as drafted will require the use of CPO powers for which the Council will be unable to demonstrate a compelling case in the public interest. On this basis, the Draft SPD should not be put forward for adoption unless and until more detailed consideration of the options for servicing the proposed Theatre which do not require the use of Hooper's car Parking land.</p> <p><i>TWBC: see attached supporting documents.</i></p>			
<a href="#">CDPF_36</a>	Dr Robert Banks	<p>This section is not truly about 'Vision and Objectives' as it is providing justification for decisions that have already been predetermined because the proposed new civic centre and theatre have already reached RIBA Stage 3 which has now been accepted by the Full Council at the meeting on 6 December.</p> <p>With regard to sections:</p> <p><i>Establish a strong new focus for the town</i></p> <p>It is difficult to justify how the new civic buildings will play an essential role in the</p>	<p>The document confirms that the existing buildings should be conserved and enriched.</p> <p>The development of the existing town hall will however be contrary to the Site allocations local Plan 2016 in which it is stated;</p> <p><i>any proposals affecting the Town Hall will be expected to retain significant features, such as the main entrance, staircase and Council Chamber in situ and allow their continued use for civic functions and other compatible uses.</i></p> <p><b>Integration of development within its local context</b></p> <p>'Re-modelling and re-use of the existing buildings should reflect their listed</p>	<p>The public realm will not be improved by the likely increase in traffic around the theatre and the station. The will increase both traffic congestion and pollution</p> <p>The construction of the underground car park will exacerbate the above and will also adversely affect the vista from the top end of the park. This car park and its associated problems will only be required if the development proceeds.</p>		<p>At the Full Council Meeting in September all the councillors were advised that this was a draft document that would be modified in response to further developments. The current document has not been altered to reflect effects of the development of the cinema site on the town centre.</p> <p>This planning framework is not a prospective plan as the new civic centre development has already been accepted by the Full Council. As the outcome has been predetermined and hence this surely invalidates this consultation process.</p>	<p>Comments noted.</p> <p>Some of the comments are generally directed to the Civic Project proposals themselves and the possible impacts of such a development rather than related to the purposes of the draft document, its structure, form and content.</p> <p>Where the comments relate to the Civic project proposals the comments have been forward to the project team for consideration.</p> <p>Any planning applications that may be submitted for proposed development on any of the sites included in the SPD will need to demonstrate that the relevant development is acceptable in planning terms.</p>	<p>No specific changes to draft document in addition to those identified.</p>

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		<p>everyday civil and community activities of the town that will be as well served as by the existing ones. Currently the Civic offices, theatre, museum and library are all in adjacent buildings whereas with the new proposal they will be divided. It is difficult to understand how siting the offices, a large number of which are to be let commercially, and the theatre between Calverley grounds and the station will link the upper and lower parts of the town. The offices will be only visited by a small number of the general public during the day and the theatre will attended mainly in the evenings.</p> <p><i>Create a forum for public life</i></p> <p>The statement that the theatre will strengthen the town as a cultural beacon is aspirational and not factual cultural. No information has been given as to how 'the new space provided by the development will offer the opportunity for people to gather together and to celebrate life's</p>	<p>status and contribution to the wider townscape'.</p> <p>It should bee noted that Historic England in their report requested that further views should to be given of the new buildings from different areas of the town in order to satisfy the above.</p> <p>No confirmation has been given by TWBC that this has been undertaken.</p>					



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		<p>special moments’.</p> <p><i>Protect and enhance the historic townscape</i></p> <p>No definitive plans have been formulated. The revenue from the sale of these historic buildings will be needed to help to fund the new development. TWBC should provide a definitive statement of the restrictions that will need to be applied before the existing buildings are put up for sale.</p>						
<b>Received after close of consultation</b>								
CDPF_37	Kent County Council (Planning and Environment)					<p>Thank you for inviting Kent County Council (KCC) to comment on the Tunbridge Wells Borough Council Civic Development Planning Framework – Draft Supplementary Planning Document (SPD).</p> <p>The County Council recognises the value of compiling a SPD focused on Tunbridge Wells Town Centre. The County Council will continue to work closely with the Tunbridge Wells Borough Council (TWBC) to help shape the form and quality of future development proposals in this area and to deliver the priorities and objectives set out in the draft SPD.</p> <p>KCC has reviewed the consultation document and provides the comments below.</p>	<p>Comments noted in particular those in relation to possible biodiversity enhancement and flooding avoidance / mitigation.</p> <p>Revised / additional wording to draft SPD considered.</p>	<p>Changes made to draft SPD regarding flooding and surface water – see detailed changes above.</p> <p>No additional specific changes to draft document in addition to those identified.</p>

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						<p><i>Highways and Transportation</i></p> <p>KCC Highways and Transportation has been consulted on the site over the last twelve months, particularly in relation to the emerging Transport Assessment (TA), and the team look forward to the opportunity to review and comment on the draft assessment in due course.</p> <p>KCC considers that the following considerations should be included within the SPD:</p> <ul style="list-style-type: none"> <li>• The impact of the proposal on the local road network, particularly the junctions within close proximity of the site that already experience high volumes of traffic at peak times;</li> <li>• The impact of construction traffic on the local network;</li> <li>• The serviceability of the site for delivery vehicles, both during the construction period and following completion;</li> <li>• The provision of a pedestrian-friendly space that links to the retail area to the Civic Complex and the park beyond; and</li> <li>• The impact of proposals on car parking provision in the town centre, both through the construction period and following completion.</li> </ul> <p><i>Biodiversity</i></p> <p>The County Council notes that the SPD does not include ecological considerations. It is recommended that TWBC seeks advice with regard to any potential ecological impacts to ensure that any necessary appropriate mitigation measures are included within</p>		

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						<p>the SPD.</p> <p>In particular, KCC recommends that the SPD includes ecological enhancements, above and beyond any mitigation and/or compensation measures, to ensure that net gains for biodiversity are achieved. The National Planning Policy Framework (NPPF) makes it clear that the planning system should deliver ecological enhancements, so it is recommended that enhancements are an integral part of both the mitigation and overall design strategy for the SPD.</p> <p><i>Sustainable Urban Drainage</i></p> <p>KCC, as Lead Local Flood Authority, supports the role that a new design framework within the central area of Tunbridge Wells can play in shaping future development and the role it can have in providing sustainable and resilient places.</p> <p>The Borough Council has identified "a Sustainable Future" as one important principle for the study area, but it has defined this only in the context of carbon footprint and self-sufficiency.</p> <p>It is recommended that the Borough Council expands the definition of "sustainability" to include the resilience of the local infrastructure. As the town centre has experienced major flooding in recent years, when the new development comes forward, initiatives for reducing surface water loadings on the combined sewer system within the city centre should be explored.</p> <p>Further, the design principles for the public realm should consider how</p>		

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						<p>surface water can be managed to reduce peak flows to the sewer system. KCC recommends that the Council considers best practice from other local authorities who have pursued innovative solutions to surface water management.</p> <p><i>Heritage Conservation</i></p> <p>KCC supports the role of the SPD in encouraging sensitivity to the wider historic context, both within the area covered by the SPD and the surrounding townscape of Tunbridge Wells.</p> <p>The County Council would like to see a suitable and viable long term use of the area, to protect the historic environment from any deterioration. In order to do so, there may be some adaptation and loss of fabric required, especially in relation to the Council Chamber. It is recognised that the Chamber is sited in a position that does not result in any visible impact within the street.</p> <p>The SPD should seek to protect the historic nature of the area and ensure a reasonable approach to secure the long term future of the historic environment.</p> <p><i>Culture and Creative Economy</i></p> <p>From a culture and creative economy perspective, KCC is broadly welcoming of the Borough Council's ambitious vision for the town centre. In particular, the intention to place a flagship cultural development at the centre of a longer term vision to create a vibrant and attractive borough with a strong cultural offer.</p>		

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						<p>KCC recognises that the current building that houses the Assembly Hall Theatre presents a number of challenges, which are potential barriers to growth. The plans for a new theatre provide a significant opportunity to meet the cultural needs of an ever growing population, enabling access to rich cultural experiences for all communities in Tunbridge Wells as part of everyday life. The plans for the Tunbridge Wells Culture and Learning Hub demonstrate a truly innovative approach to service design, and it is undoubtedly destined to be a centre of cultural excellence in the County.</p> <p>KCC recognises Tunbridge Wells as a key creative cluster and values its contribution to the wider Kent economy. In order to achieve the vision set out in the Kent Cultural Strategy 2017-2027, investment in cultural infrastructure where there is proven potential for sector growth, as in Tunbridge Wells, is key.</p> <p>The County Council will continue to work closely with TWBC on the formulation and delivery of the SPD and would welcome any further engagement in the process.</p> <p>If you require any further information or clarification on any matter in this letter, please do not hesitate to contact me.</p>		
CDPF_38	Benenden Parish Council					<p>Benenden Parish met after the consultation portal closed on Monday. However it was agreed that we could submit informal comments by email a bit late but ASAP.</p> <p>Therefore in brief,</p>	<p>The comments are generally directed to the Civic Project proposals themselves and the possible impacts of such a development.</p> <p>Noted as comments.</p>	No change to draft document.

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						<p>"Benenden Parish Council has considered the proposed Civic Centre and Theatre Development in Royal TunbridgeWells, and is very supportive of the proposals. We consider the design and architecture to be innovative and striking and will improve that part of the town. The facilities to be provided will be materially better than those currently provided for both TWBC and the town as a whole. Also the addition of the Theatre will enhance the cultural life of the town, and enable a wider range of productions and other activities.</p> <p>It is acknowledged that residents other than those of RTW itself will use these facilities, although probably not as must as residents of the town.</p> <p>The Parish Council is however concerned that the proposed development should not impact adversely on the finances of the rural Parish Councils or individual parishioners. The council was further concerned that the services provided by TWBC to the rural parishes should not suffer or be reduced as a result of the significant commitment of the Borough to this project."</p> <p>I hope that you will find these comments helpful and wish the project well.</p>		
<b>In addition to the changes outlined above, in response to specific representations received, it is proposed to make the following additional revisions to the draft SPD</b>								
							<p>Page 5: 1.1 Introduction</p> <p>Add: <b>In conjunction with consideration of the adoption of the document as a Supplementary Planning Document a further 6 week period of public consultation took place from 30 October to 11 December 2017. As a result a number of further revisions have been incorporated.</b></p>	

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							<p>Page 16: 2.1 Vision</p> <p>Amend paragraph 3: <b>The ambitious Civic development project presents an opportunity to create a new focal point for civic functions and public life Tunbridge Wells and with the potential to play a major role in strengthening Tunbridge Wells’ identity as a cultural destination in the south-east.</b></p> <p>Amend paragraph 4: <b>The proposed development has the objective of delivering a more.....</b></p> <p>Page 17: 2.2 Objectives</p> <p>Amend first objective commentary: <b>The proposed new civic buildings objective is to play.....</b></p> <p><b>Their location between Calverley Grounds and the railway station seeks to strengthen .....</b></p> <p>Amend third objective commentary: <b>The historic buildings, listed garden/park and spaces in the town centre.....</b></p> <p>Amend fourth objective commentary: <b>New developments and particularly the proposed new Council office building and civic suite.....</b></p> <p>Page 26: Vehicular movement</p> <p>Add to paragraph: <b>All new development will need to demonstrate that satisfactory access and servicing can be achieved for existing and proposed buildings and uses.</b></p> <p>Page 28 Car Parking</p> <p>Amend paragraph 2: <b>It may be possible for the basement parking to extend below part of Calverley Grounds provided that any specific proposals demonstrate that this can be achieved without detriment to the landscape of the Grounds.</b></p> <p>Add to paragraph: <b>All new development will need to demonstrate that satisfactory access and servicing can be achieved for existing and proposed buildings and uses.</b></p>	

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							<p>Page 29 3.3 Land Use</p> <p>Amend paragraph 2: <b>The policy therefore provides for options which include some of the uses being provided for on sites within the wider town centre, including in the lower area identified by the Development Framework.</b></p> <p>Page 35 4.1 Existing Town Hall and Assembly Hall</p> <p><b>Delete final sentence of final paragraph</b></p> <p>At page 37 paragraph 2 and page 38, 4.4 heading amend to refer to:</p> <p><b>9 and 10 Crescent Road.</b> (rather than Calverley Terrace)</p> <p>Page 40, 4.6 Context</p> <p>Amend paragraph 1: <b>together with the proposed new theatre, has the objective of framing an improved entrance into Calverley Grounds.</b></p> <p>Page 42, 4.7 Context</p> <p>Amend paragraph 2: <b>The proposed theatre along with the office building and civic suite , has the objective of framing an attractive new gateway into Calverley Grounds.</b></p> <p>Add additional sentence to final paragraph: <b>Any submitted planning application will need to demonstrate that satisfactory access and servicing can be achieved for existing and proposed buildings and uses.</b></p>	