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By email only: RTWTownCentrePlan@TunbridgeWells.gov.uk

Date: X March 2024

Dear Ms Gilbert,

Draft Royal Tunbridge Wells Town Centre Plan – Vision 2040 (Regulation 18 (Part 1) consultation)

Thank you for consulting Maidstone Borough Council (MBC) on the draft Royal Tunbridge Wells Town Centre Plan – Vision 2040. Maidstone Borough Council's comments on the draft plan are detailed below.

Overall, MBC broadly agrees with the draft Vision for the Town Centre and supports the seven principles identified in the plan. MBC considers the draft vision for Tunbridge Wells Town Centre to be appropriately balanced in terms of ambition and achievability.

The SWOT analysis is comprehensive in identifying the main Strengths, Weaknesses, Opportunities and Threats under the four separate headings. However, as currently worded, the analysis appears contradictory in some places. For example, under Economics and Viability, a strength is the 'limited competition – dominant centre in the region' yet a weakness is that it 'punches below its weight as a town centre'. Under Decarbonisation, a strength is 'carbon emissions are reduced by around 17% from all sources', yet a weakness is that 'overall energy/carbon emissions remained static' over the same time frame.

In terms of the sites listed within the draft plan, MBC has no site specific comments to make. However, MBC would suggest that the preparation of this plan and the sites identified therein represent an opportunity to further explore the potential for additional development capacity in this location (both residential and employment uses) – given the significant reductions in homes and employment floorspace now proposed within the Tunbridge Wells Local Plan (response to Inspector's initial findings). Allocating additional development within this Development Plan Document may go some way towards meeting the full identified needs as set out in the Tunbridge Wells Local Plan. Further, whilst it may be set out in the supporting evidence, it is not clear what the distinction is in the tables between the terms 'residential' and 'town centre living' or whether these phrases are used interchangeably across the listed sites? Clarification in this regard would aid the reader.

MBC notes that the draft Royal Tunbridge Wells Town Centre Plan is being produced as a Development Plan Document – this being a Regulation 18 (stage 1) consultation. I note the

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expected submission date of June 2025 within the Local Development Scheme, in line with the NPPF transition cut-off date ahead of the 'new style' plans. It is assumed that this DPD is predicated on having the Local Plan adopted in accordance with the current LDS timetable. However, if for any reason, this is not achieved, MBC are keen to understand if there are implications of progressing this DPD without the Local Plan and relative policy STR/RTW2 – Royal Tunbridge Wells Town Centre in place?

I trust these comments are helpful in the context of preparing the next stage of the draft Royal Tunbridge Wells Town Centre Plan. MBC look forward to continued engagement with TWBC as the plan progresses.

Yours sincerely,

Councillor Paul Cooper

Deputy Leader of the Council

Cabinet Member, Planning, Infrastructure & Economic Development

Chairman, Democracy & General Purposes Committee

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