

TUNBRIDGE WELLS BOROUGH
DRAFT LOCAL PLAN (REGULATION 18)
Consultation 20 September to 01 November 2019
RESPONSE FORM

This response form is for use with the Draft Local Plan (Regulation 18) consultation document.



ROYAL TUNBRIDGE WELLS TOWN FORUM

The voice of the residents of Royal Tunbridge Wells

COMMENTS ON A PARTICULAR SECTION OR PARAGRAPH

COMMENT BOX 1A

Please state which section or Paragraph number(s) you are commenting on.

Section Numbers: 2-7 Comments are given below on paragraphs from each section. In the case of our comments on specific Policies below, references are also sometimes made to individual paragraphs in a section.

COMMENT BOX 1B

Please enter your comments in the box below.

Section 2: Challenges and Opportunities

In Paragraph 2.10, we support the recognition that, while some of the natural and built assets of the Borough are a constraint to new built development, they perform valuable roles in relation to the further development of tourism, the rural economy, leisure and recreation.

In Paragraph 2.15, we endorse the intention to support carbon reduction and transition to a low carbon future. With regard to water stress, we consider this to be a significant looming problem in the Borough and that it should be taken more seriously as a constraint on built development.

In Paragraph 2.22, based on the experience of the past, we are sceptical that sufficient funding from development will become available to fund mitigation of the impact of new development. Development on the scale proposed in the Draft would also require very substantial public investment which cannot be relied on at present and so may act as a constraint in practice.

In Paragraph 2.25, we strongly support the intention to improve air quality not only within the AQMA but throughout the urban area of RTW, but question whether proposed measures will be sufficient.

In Paragraph 2.26, we challenge whether “predict and provide” in relation to parking will allow the transition to active travel promoted elsewhere in the Draft. We provide more detailed comment on this issue elsewhere in our response.

In Paragraph 2.32, we strongly support the efficient use of land which will generally require significantly higher housing densities than have previously been the case, while seeking to avoid adverse impact on the character and setting of the natural and heritage environment.

In Paragraph 2.35, we support the provision of appropriate additional land to facilitate business growth and expansion. Too much employment land has recently been lost to office conversions to residential in the town centre against the wider public interest. However, considerably more than the predicated 14Ha seems to have been allocated in Royal Tunbridge Wells.

In Paragraphs 2.36-2.38, we particularly support the encouragement of a strong cultural element to development, including public art, to add to the cultural and creative offer of the Borough and flexibility of uses within RTW town centre to ensure long term adaptability to retail change. Every possible source of funding should be explored to make this a reality.

In Paragraph 2.40- 2.44, the constraints of the Green Belt and AONB mentioned in Paragraph 2.40 should be cross referred to Paragraph 2.10 where they are also described as having balancing attributes which should be given their full weight in restraining inappropriate development when assessed according to each site’s landscape and environmental sensitivity.

In Paragraph 2.46 we support the securing of development money to enable improved local leisure and recreation provision.

Section 3: Vision and Objectives

We have no comments on paragraphs which are not contained in our response to the Vision and Objectives section below

Section 4: The Development Strategy and Strategic Policies

In Paragraph 4.3, no mention is made of the landscape, heritage and water provision constraints on development which may well inhibit full provision of the development needs of the Borough as defined by central government.

In Paragraph 4.9 we support the need to take account of new data on objectively assessed housing need in the period leading up to the Regulation 19 submission

COMMENTS ON A POLICY

This comment box can be used for comments on Strategic Policies (Section 4), Strategic Place Shaping Policies (Section 5), Site Allocation Policies (section 5), or Development Management Policies (Section 6).

If you wish to make comments on multiple policies, please copy and paste Comment Boxes 2A and 2B for each Policy you are commenting on.

Comments follow on the AL/RTW policies, EN policies, H policies, ED policies and TP policies

The following commentary is given on the STR/RTW and AL/RTW Policies

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support with conditions + General Observations
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: STR/RTW 1: Strategy for Royal Tunbridge Wells

In **Paragraph 4**, the need to ensure the maximum potential for active travel to primary schools makes the expansion of St Peter's and Skinners Kent Primary School grossly inadequate. KCC's focus on overall capacity and providing and maintaining school places at the lowest initial outlay has resulted in unsustainable long-term consequences for the town in terms of traffic congestion and public health. In view of the climate emergency, provision of primary schooling within walking distance of target populations should in future take precedence over the previous KCC policy of expansion of existing schools, which makes extra car journeys inevitable. At this moment, at the very least, St Peter's existing site should be maintained as a primary school and work should then be undertaken to identify additional sites.

The Draft Plan refers to Kent's Commissioning Plan for Education Provision 2019-2023, which is inadequate because:

- It only covers part of the period of the Local Plan because the plan periods of the Education Commissioning Plan and the Local Plan do not coincide
- Its recommendations are based on the current local plan with its significantly lower housing numbers
- It only deals with the total number of school places required without considering the point of need and where they can be accessed sustainably.

Lack of walking access to primary schools is a significant contributor to traffic congestion and therefore pollution, especially from private vehicles. 46% of primary school children are now driven to school by car with numbers on the increase since 2003. Every primary school child driven to school entails four road trips (to and from school twice a day).

KCC's recent wave of school expansions (still advocated under the Draft Plan) has created ever contracting and expanding catchment areas. This has given rise to thousands of unnecessary rush hour car journeys every week. Bishop's Down Primary School, Tunbridge Wells, illustrates the problem. It was expanded in order to meet the rising demand in school places since 2004. Because the school premises could not support an additional classroom for every year in the 7-year primary school cycle, classrooms were added for three years to facilitate the intake of an additional class (30 children) during those years. After three years, the intake was reduced from two classes back to one class for the following four years.

The effect has been that children from areas beyond reasonable walking distance were admitted during expanded years. School admissions criteria stipulate that siblings of existing pupils be granted priority access before any children are admitted based on the distance between their home and school. After three years of expansion and the following reduction to the original class size, the school's reception class consisted exclusively of siblings and no children could be admitted on distance criteria. Moreover, ten siblings were still unable to gain a place. Therefore, those siblings and all local children were assigned different schools and sent to far away schools such as Pembury, which was partially expanded to absorb the overspill. Pembury Primary School in turn started an expanding and contracting catchment cycle of its own requiring children from Tunbridge Wells to travel to Pembury and vice versa. There are thus overlapping areas where parents beyond active travel distance for young children presently drive across town into each other's neighbourhoods to deliver young children to school.

Under the duty to cooperate, TWBC should collaborate with KCC to protect the last remaining sites where neighbourhood primary schools can be built. We therefore propose adding to the Draft a Policy that would make the potential for a primary school on a site a "material consideration" to be taken into account in deciding any planning application in the town centre. KCC/TWBC should prepare maps that illustrate where the lack of provision already exists and where it will be exacerbated by any residential allocation under the Plan. There are already too many areas without sustainable local primary school provision in Tunbridge Wells. The New Local Plan *must* ensure that *additional* town centre sites are reserved for the building of new primary schools during the whole period of the plan.

In **Paragraphs 6-8**, we support the provisions to expand sport and recreation facilities to mitigate the impact of future development. However, we do have concerns about the

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
General Observation
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: AL/RTW 1 Calverley Square</p> <p>There is no consensus in the Town Forum about this proposed allocation which now appears likely to require substantial re-writing prior to the Regulation 19 Submission Draft in the light of the abandonment of the present project. There is, however, <i>a consensus that an underground car park under parts of Calverley Grounds is inappropriate on a number of grounds</i>, whatever the revised scheme which may emerge.</p>

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support + General Observations
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: AL/RTW 2 RVP</p> <p>We support this allocation. Given the rapid change in the nature of retailing and leisure activities a further review of use classes for this site may become appropriate at the 5 year review stage of the Local Plan to take account of developments.</p> <p>We suggested to the previous owners of the site that scope may exist for the creation of outdoor cafes and other restaurants at Level 9 of the car park to take advantage of vistas over the town and more distant landscapes, as has been done in the remodelling of the Westgate Centre in Oxford.</p>

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support + General Observations
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: AL/RTW 4 Torrington</p> <p>This site offers major redevelopment potential which should be realised through the proposed Masterplan to include the detailed prospectus set out under the policy. We fully support the desire to achieve considerable density of residential development at this extremely sustainable location for active travel. The possibility of direct pedestrian connectivity between the retained car parking and Mount Pleasant and Calverley Grounds should be explored in the possible form of an elevated walkway passing above the railway at a point to be determined with Network Rail.</p>

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
General Observation
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: AL/RTW 6 Town Hall</p> <p>There is no consensus in the Town Forum on the possible redevelopment of this site as its future will depend on decisions taken in relation to policy AL/RTW 1. <i>However, owing to its strategic importance at the heart of the town, we believe it should remain under TWBC ownership</i> or that, at the very least, TWBC should retain a controlling legal interest in the site as it has done in the case of the RVP.</p>

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support with conditions
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Numbers: AL/RTW 7,8,9,10,14,15,19, 24, 26,28,29,31,32

The above sites seem suitable for allocation subject to the proposed conditions written into the policies.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

General Observations

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: AL/RTW 11 Plant and Tool

While housing may appears an adequate use of the site taken in isolation, this would significantly reduce the opportunities for long term redevelopment of a much greater area behind it for transport and other mixed uses. This site might have far greater potential as a multi-storey car park as part of a future remodelling of the site at the West Station in conjunction with restoration of a public transport rail service. The site might also be considered as a suitable alternative for car parking if the Calverley Square scheme (AL/RTW 1) goes ahead in revised form.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support with conditions

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: AL/RTW 12 Land adjoining Longfield Road

If incursion into the AONB is found to be justified by exceptional circumstances, the site would appear suitable for expansion of the business park to provide much needed replacement office/light industrial space. There is a significant topographical question mark over the northern boundaries which are higher level ground which would damage the important green backdrop to the current edge of the town. The proposed green buffer appears to mitigate these negative effects to some extent provided it can be effectively safeguarded through the policies set out in Paragraphs 4-7.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support with conditions

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: AL/RTW 13 Colebrook House

If justified by exceptional circumstances, this site, like site AL/RTW 12, appears appropriate for business employment uses. Retaining the site within the Green Belt and AONB is a novel concept which requires further detailed appraisal, as substantial built development is intended. Given its relatively elevated location, careful landscape treatment with conservation of the parkland setting and enhancement of existing woodland cover to provide mitigation would be essential. This would seem to require a strategic landscaping scheme as an integral part of any planning application as is being required under AL/TW 12.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support with conditions

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: AL/RTW 16 Wyevale

We previously commented that mixed use redevelopment of this site would be appropriate provided that higher parts of the site adjoining the Common, the historic setting of Hungershall Park and High Rocks Lane were safeguarded as green spaces, which is achieved in the draft policy. The access to the A26 remains a critical issue requiring improvement.

We would support the creation of an active travel route through the site linking High Rocks Lane and the A26 as this would create an excellent new route into the town centre avoiding the extremely daunting incline from the bottom of Cabbage Stalk Lane up through Hungershall Park.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

General observations
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: AL/RTW 18 Spratsbrook Farm</p> <p>This is a more difficult site than appears at first glance as is shown in the SHELAA assessment, particularly as the landowner is understood to have acquired other adjacent land in Wealden District for potential development. This site is Green Belt and AONB and should only be developed upon evidence of exceptional circumstances.</p> <p>There are some particularly significant landscape issues with regard to the rising ground furthest from Eridge Road to the west of the site as the grassland there appears to be highly visible from the Beacon Hotel and Rusthall Common and any urban development here would destroy the apparent continuity of undeveloped AONB landscape stretching to the horizon and Crowborough Beacon. If the site is developed, this area should be retained as a protected open green space as playing fields (in conjunction with the proposed secondary school which should therefore be adjacent) and/or recreational land, without any encroaching buildings. This would also allow mitigation to the setting of the adjacent Ancient Monument hill fort further to the west.</p> <p>The remainder of the site appears to have potential for the local secondary school which will be required in the southern quarter of the town given the significant residential expansion taking place at Hawkenbury, the proposed residential development adjacent to Ramslye also on the Spratsbrook site, the proposed remodelling of part of Showfields and other long term development potential in the south of the town.</p> <p>If exceptional circumstances should be made out, any housing development on the site should seek to ensure a much greater housing density than has been achieved on the Berkeley Homes development at Hawkenbury in order to justify incursion into the Green Belt/AONB. Also the proportion of affordable housing should be increased, at least to the new general level of 40%, with some significant social rented housing adjoining the Ramslye estate. We welcome the draft housing policies that seek to achieve this objective.</p> <p>Adjustment of the 30mph limit zone would be required, the more so if the idea of a secondary school is pursued, with new active travel routes into the town as proposed. It should be noted that, if the West Station were to be re-opened to public rail services, it would be particularly useful as a public transport hub for this site, being within walking/cycling distance and mostly under one mile distant.</p>

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support with conditions
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: AL/RTW 20 Telephone Engineering Centre

Development for residential use is appropriate given the housing need and the benefit of using a brownfield site but, given its relatively central location and proximity to existing green space, development should be of a much higher density than is proposed.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support with conditions

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: AL/RTW 21 Culverden Stadium

As a former Rural Fringe site adjoining the LBD, this site appears appropriate for residential development subject to the preservation and enhancement of tree cover to the north and on the boundaries. The northern edge of the site sits on a prominent escarpment and the maintenance of the Ancient Woodland buffer is vital all along the escarpment abutting Smockham Farm as is provided for in Paragraphs 2 and 4.

Because there are existing acute traffic problems on Culverden Down caused by the “school run” to a number of nearby schools, together with additional commuter rat-running, a further pre-condition for **any** planning permission on the site should be the prior introduction of a 20mph zone in the whole of the Culverden area together with filtered permeability and safe walking and cycling routes to local schools to make local active travel a reality.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support with conditions

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: AL/RTW 23 Land north of Hawkenbury Recreation Ground

The creation of the new sports hub is welcome and the use of the site appropriate in preference to additional residential development so close to the AONB.

Access to the site should be via Hawkenbury Recreation Ground as the access via High Woods Lane is unsuitable for motor vehicles because of the rather dangerous junction with Halls Hole Road, itself far too close to the junction with Hawkenbury Road. But an active travel route to a secondary entrance on High Woods Lane would be of significant benefit as would the closure to through traffic of Halls Hole Road itself.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support with conditions

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: AL/RTW 25 Land at Colebrook Sports Field

While some residential development here may be appropriate, the draft policy does not show clearly enough the extent of green space that would be retained. The surrounding residential areas are densely populated and access to alternative green spaces is not particularly good. The policy should clarify the green space that would be retained and how it would be enhanced.

The following commentary is given on the EN Policies

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support + General Observation

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: EN 1 Design and Development Management criteria

As a ***general observation applicable to this and several other EN policies***, we strongly support the ***clearly prescriptive approach*** being taken as to the outcomes to be achieved while also usefully offering ***practical guidance*** to developers on methodology in the form of key question checklists. This should lead to better quality planning applications requiring less corrective action by planning officers and resulting in an overall saving of time and resources in determining applications.

We strongly support the comprehensive treatment of design and development management issues combined in this one Policy.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Object to Paragraph 6.18 but Support remainder with conditions

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: EN2 Sustainable Design and Construction

We are unfortunately bound to express an OBJECTION to this policy but only because of the reference in the supporting Paragraph 6.18 to **Biomass**. The use of Biomass in any circumstances is currently subject to serious controversy about its overall sustainability and environmental effects, some of which can be more noxious to health than the running of HGV diesel engines in a locality. ***With the possible exception of use in highly controlled conditions ensuring no atmospheric pollution and in a very large installation, the encouragement of burning of any kind of wood, solid fuel or biomass within the RTW urban area is strongly opposed.*** New installations should no longer be permitted in any domestic context and we would advocate that bye laws be made limiting the circumstances in which existing installations can be used.

There may be circumstances elsewhere in the Borough, for example in the case of isolated farmsteads, where no prescriptive action need be taken.

With the above exception, we strongly support this policy and the clarification of what may be considered “exceptional design” given in the supporting Paragraph 6.20 and the guidance concerning reuse in Paragraph 6.21 and practical guidance as to sustainable construction methods in Paragraph 6.22.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: EN3 Sustainable Design Standards

We particularly welcome the provision which encourages better than minimum design standards in residential developments and which allows the council to require further improvement under the Plan as and when national policy allows it to do so.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Object + Support with conditions

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: EN4 Energy Reduction in New Buildings

We strongly support the robust approach taken in this policy *but we are unfortunately bound to express an OBJECTION* only because of the reference to **biomass boilers**. This needs to be clarified *to allow the use of such boilers in urban areas only in very specific circumstance where zero emissions can be guaranteed*. Even in such circumstances, the use of biomass will involve the carriage of large quantities of fuel, most probably by road, raising further questions as to its overall sustainability.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: EN5 Climate Change Adaptation

We strongly support this policy to mitigate the effects of climate change and welcome the referencing to the latest strategy published from time to time by the National Adaptation Programme.

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support + General Observation
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: EN 6 Historic Environment</p> <p>We strongly support the whole of this condition with its clear prescriptive provisions referring to the guidance set out in Paragraph 6.5 including its cross reference to Heritage assets and also to current government historic environment policy and guidance. It may, however, in practice prove difficult to give full effect to this policy particularly in relation to the impact on an existing historic environment of a proposed major urban development.</p>

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support + General Observation
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: EN 7 Heritage Assets</p> <p>We strongly support this policy and the inclusion of non-designated heritage assets (of which Royal Tunbridge Wells contains a very large number of examples, with some yet to be identified) within the Policy. We also support the reference to the relevant sections of the NPPF, TWBC Historic Environment Review and list of Local Heritage Assets. We strongly support the requirement in relation to both direct and indirect effects of proposed development, including development which may affect the setting of a listed building, conservation area, historic park, ancient monument, historic landscape, archaeological site or local heritage asset.</p> <p>The inclusion of the demolition provisions should in future prevent the type of blighting of a historic building which took place at Blue Boys Kippings Cross.</p>

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: EN 8 Shop Fronts</p> <p>We support this Policy to protect historic shop fronts and the specified areas to which it is intended to apply. We also support the power for the council to require proof of a genuine security need before unsightly grilles and shutters are installed and to prevent obtrusive lighting emanating from shops.</p>

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: EN 9 Advertisements</p> <p>We support this policy, particularly as it will apply to conservation areas, listed buildings and non-designated heritage assets.</p>

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: EN 10 Outdoor lighting</p> <p>We support the intention to seek to limit the impact of light pollution on local amenity, intrinsically dark landscapes and wildlife. This is not only important in relation to the open countryside but also to semi-rural settings on the edge of Royal Tunbridge Wells LBD to prevent light pollution leaking out into the open countryside.</p>

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support + General Observation
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: EN 11 Net Gains for Nature</p> <p>We strongly support the intention behind this policy but it will be very challenging indeed to deliver it. There is therefore a real danger of tokenism creeping into planning decisions where the harm being created is clear but the proposed mitigation may be nebulous, uncertain and ineffective.</p>

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: EN 12 Protection of sites and habitats</p> <p>We strongly support this policy with its recognition of the importance for Royal Tunbridge Wells and its urban population of Local Wildlife Sites, Roadside Nature Reserves, Local Nature Reserves and Candidate LNRs and Sites of Local Nature Conservation Value within and adjacent to the urban area,</p>

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support with Conditions
COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: EN14 Trees, woodlands, hedges

We strongly support this policy but would like to see the intention expressed in Paragraph 6.160 to work proactively with woodland owners and relevant organisations to bring woodland back into management where possible, imported into the policy itself. It would also be useful to define how the “desirability” of a proposed development should be assessed against the contradictory requirement to retain woodland, hedgerows and trees, because this could otherwise lead to variable and subjective decisions by planning officers. This could be done by importing the reference to “*unequivocal evidence of need and benefits of the proposed development*” from Policy EN 15.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: EN 15 Ancient Woodland

We strongly support this policy including the inclusion of ancient wood pasture and historic parkland within the policy.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: EN 16 Green, Grey and Blue infrastructure

We support this policy and hope it will lead to a programme of street tree planting in appropriate parts of the RTW urban area financed by Sec 106 contributions. Trees contribute to health and wellbeing of residents and mitigate the effects of atmospheric pollution.

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support with Conditions
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: EN 17 Local Green Space</p> <p>We strongly support the inclusion of all eligible sites across the Borough and welcome the added protection that designation as a Local Green Space will bring for those designated following the Draft Local Green Space assessments and ongoing consultations. These spaces are of particular value in relation to health and wellbeing of residents in the densely populated urban area of RTW.</p> <p>We understand that public parks such as Dunorlan and Calverley Grounds do not fall within the category of Local Green Spaces and believe that they, and any individual trees within them, should enjoy equivalent protection to that given to Local Green Spaces.</p>

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support with Conditions
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: EN18 Landscape

We strongly support this policy. So far as Important Landscape Approaches are concerned, we believe ***a case exists for widening their application to include approaches to settlements along railway lines where the quality of the landscape clearly merits protection***. It is arguable that visitors to a settlement arriving by train will be far more aware of a landscape approach than those arriving on a motor road. Such landscapes may constitute a significant feature and create a lasting impression in the minds of visitors and tourists.

A significant case in point exists in the approach to Royal Tunbridge Wells along the Tonbridge to High Brooms section of the Hastings Line between the exit from Somerhill Tunnel and the railway viaduct preceding the former refuse tip, including long views on the western side of the whole of the undulating and rising open AONB farmland with its isolated farm cottages and Vauxhall Rural Lane meandering along broadly in parallel, while the eastern side mainly consists of ancient woodland with extensive tracts of Bluebells in the spring.

This is a key landscape approach to RTW from the north and is visible not only from the railway line but also from the Tunbridge Wells Circular Walk. It is Town Forum policy to maintain the integrity of this particularly high quality AONB and Green Belt landscape as the most significant green gateway to the urban area and a clearly visible barrier to coalescence of RTW with Tonbridge . A way should be found of permanently protecting it. We therefore support the conclusions drawn by TWBC on Capel submitted sites 49, 62, 77 that the sites are unsuitable for development.

We are also concerned that the ***proposed allocation*** in Southborough of submitted site 445 in the AONB and Green Belt (Mabledon and Nightingale) would also affect this landscape approach to Royal Tunbridge Wells and we urge that those parts of this very large site which are visible from the railway line or the Tunbridge Wells Circular Walk should be excluded from allocation, if such is proved to be justified on exceptional circumstances, or made subject to enforceable long term protection.

We consider that the whole of the above Important Landscape Approach should be defined and included on the draft Policies Map.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support + General Observation

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: EN 19 Arcadian Areas

We strongly support this policy. Arcadian areas are one of the defining features of Royal Tunbridge Wells and should be protected. In the case of Hungershall and Nevill Parks they look out at one another across a large open green space which should be considered an integral feature of their combined Arcadian Area. It would be worth considering whether any further new areas within the urban fabric would warrant Arcadian Area status.

We believe that a greater enforcement effort should be directed to prevention of any loss to the character of Arcadian Areas from the actions of individual landowners.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: EN 20 Rural Landscape

We support this policy for the reasons set out in our comments on Paragraphs 6.211-6.223 ante, particularly with regard to protection of historic farmsteads and Rural Lanes.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support with conditions

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: EN 21 High Weald AONB

We feel it would be useful at the opening of the policy, rather than almost as a footnote at the end, to state that any significant development in the AONB will only be permitted if exceptional circumstances justify it.

There also seems no sufficient reason why any sites within the AONB which it is proposed to allocate under this Draft should not be subject to the same 7 requirements in the policy as those expected of limited scale incursions.

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support with Conditions
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: EN 23 Air Quality</p> <p>The policy is acceptable as far as it goes, but it does not go very far in seeking to improve air quality. Air quality is a major health issue in Royal Tunbridge Wells and not only within the AQMA. In view of the climate emergency, all future developments should be expected to be air quality positive through building design, Sec 106 contributions or technological solutions and this should take specifically into account mitigation of the impact of all projected motorised transport to and from the site, including delivery vehicles and vehicles of statutory undertakers and other service providers.</p>

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support with conditions
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: EN 24 Air Quality Management Areas</p> <p>While we support the requirement for an emission mitigation assessment on relevant planning applications, we are very dubious about the likely efficacy of mitigation measures which may become both nebulous and tokenistic, while the likely harm will remain very real. We are very concerned that a tick-box approach may arise as in other areas of the planning process, but in this case individual lives are known to be at risk if policies are not effective in practice.</p> <p>Given the disproportionately high number of large-engined diesel cars (many now ageing and not optimally maintained) observable in Royal Tunbridge Wells which commuter rat-run through residential streets or are involved in the "school run", a case can be made for already declaring some parts of the urban road network an Air Quality Protection Zone.</p>

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Object and seek much stronger alternative policy

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: EN 25 Biomass Technology

For a number of reasons, ***we do not consider Biomass to be a sustainable technology for use in the urban area of Royal Tunbridge Wells and therefore OBJECT to this policy*** while recognising that the council is probably attempting to mitigate problems which would arise through its use in ***large installations***. We do not object to anaerobic digesters processing local waste or methane capture from former refuse sites.

Biomass use in ***domestic installations*** in RTW should be discouraged by every means available to a Local Authority because there is increasing evidence that its use, particularly in wood burning stoves, is damaging to human health at least to the same extent as substantial diesel emissions. ***Experience with existing installations shows that it is a pious hope to expect residents to comply with Defra guidance on appropriate use.*** The solution to what is a growing problem is to aim to prevent the use of wood burning stoves in urban areas altogether and certainly to outlaw any new installations. The Draft Policy should be redrawn to differentiate between urban and rural areas where, in the latter case, it may be felt that the health risks remain at an acceptable level.

Rather than encouraging biomass technology we should like to see a specific encouragement of heat pumps in domestic installations, which seem to offer a genuinely sustainable technology for the future and would also offer a better solution in outlying districts than extending the gas mains network within only a few years of the time when new gas boilers will be outlawed.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support + General Observation

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: EN 26 Water Quality, Supply and Treatment

We strongly support this policy. However, even without taking into account the apparent acceleration of climate change on our region, Paragraphs 6.250, 6.252 and 6.260 already raise major concerns as to whether the scale of proposed residential development in the Borough is compatible with the objective of maintaining adequate water resources and water quality.

How and under what legal powers is TWBC going to be able to ensure that major developments do not take place before the appropriate infrastructure is financed and put in place? Once a site allocation is made on a site which was promoted for development, it must be assumed that a developer will come forward rapidly with a planning application. How will TWBC be able to reject such an application possibly for many years? How will its obligation to deliver housing numbers sit against the need to enforce this policy?

There is also an issue raised for Royal Tunbridge Wells by the requirement that all development must provide a connection to the sewerage system *at the nearest point of adequate capacity*. Such spare capacity does not presently exist in some parts of the town, notably at Warwick Park and the Pantiles area nor does the service provider seem minded to provide it.

The current situation suggests that EN 26 Draft Policy should properly act as a significant constraint on development in the Borough to a similar extent as AONB and Green Belt, yet it does not seem to have been taken much into account in assessing the extent to which government imposed housing targets could or should be delivered or opposed.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support with conditions + General Observation

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: EN 27 Conservation of Water Resources

While we support TWBC's aspiration of reducing daily water consumption per person to 110 litres per day on new developments, this may turn out more pious hope than reality against a background of "***Serious water stress***" mentioned in Paragraph 6.260. TWBC does not seem to have the power to dictate the type of water appliance purchased in the retrofit market, nor to dictate how much water individuals will *actually* consume even though the Water Authority may be able to give some nudges through pricing policies.

If the situation is *already* one of serious water stress, it is hard to see how sufficient mitigation can be ensured to cope with the government imposed housing targets. The Council and the water companies should therefore be required to produce evidence at Examination stage of what the effect will be, of development on the overall scale proposed and how this will be mitigated.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
Policy Number: EN 28 Flood Risk We support this draft policy which is relevant to some low lying land in the south of RTW.

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
Policy Number: EN 29 Sustainable Drainage We support this draft policy which is relevant to developments affecting some low lying land in the south of RTW and strongly support the target of 50% betterment on pre-development discharge levels in those cases.

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support with conditions
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: EN 30 Noise

We support this condition but feel it would be usefully strengthened by importing into it a reference to the matters taken into consideration in Paragraph 6.277. In Royal Tunbridge Wells the main risks are from road noise arising from new development and aircraft noise arising from flight paths on the approach to Gatwick Airport which are an increasing problem in the western parts of the town even before any proposed expansion of Gatwick services takes effect.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support + General Observation

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: EN 31 Land Contamination

We support this policy as it is relevant to Brownfield sites in RTW. The Policy might usefully also deal with public health/health and safety issues affecting *existing* residents while works are undertaken to deal with land contamination prior to development.

The following Commentary is given on the Housing Policies

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: H1 Implementation for Residential Dwellings

We strongly support this policy to require planning permissions on major developments to be implemented within 2 years to avoid the delays which have sometimes occurred in the past.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
Policy Number: H2 Multi-developer Delivery We support this policy to prevent otherwise legal abuses arising from sub-dividing sites to evade Plan policies.

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support + General Observation
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
Policy Number: H3 Housing Mix We strongly support this policy and in particular the requirement in the second paragraph for affordable housing on a site to meet the size requirements established by the local Housing Needs Register. However, the intention in the first paragraph to achieve balance of housing types relative to an existing residential area is not very clearly set out and the wording needs to be improved/clarified.

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support with conditions
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: H4 Housing Density

We strongly support this policy. It is essential that land should be used in an efficient manner in order to minimise the need for use of Greenfield sites, particularly in the Green Belt and AONB. This should apply both to any redevelopment of existing urban areas and to any Greenfield land which is allocated for residential development.

We would wish to see some minimum densities per Hectare specifically set out in the policy to apply in all but defined circumstances. This would avoid the kind of situation which has regrettably occurred on site AL/RTW 255 at Hawkenbury where the effective density is a paltry 17 housing units per Hectare on a site which is subject to very little land take for landscape mitigation. Not only is this well under half of the level of density which would be appropriate within the urban fabric, but it has also resulted in the development of a substantial element of large private houses on a site which does not appear to meet the local Housing Need identified for the town in evidence base documents. It is all the more regrettable that some of the land was formerly in TWBC ownership.

In order to avoid excessive land-take, we would like to see a future design emphasis on terraced, semi-detached and small apartment blocks in major developments and reduced numbers of the 4 and 5 bedroom detached properties which are land-hungry and do not meet the housing needs profiles for the Borough.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: H5 Affordable Housing

We strongly support this general policy which seeks to address the most pressing housing need in the Borough and reflects policies which the Town Forum has been advocating for several years. There is a clearly established housing need for the 40% requirement for affordable housing on development sites of which 60% would be at social rent. We should have liked to see a 50% requirement in accordance with predicted need, but understand this would not be reasonably practicable on commercial developments.

The requirement on applicants for planning permission under paragraph 6.324 to have taken account, and factored into the land price, all the obligations in the Plan policies (for infrastructure, affordable housing, preserving and enhancing the environment etc.) is very welcome and should be imported into the Policy.

We also strongly support the mechanisms introduced into the policy to ensure that it will be properly enforced in practice, including Paragraphs 1-5 of the Overall Approach provisions (particularly the off-site requirement from sites of 1-9 units) and the paragraphs on Design and Layout and Building Standards.

COMMENT BOX 2A

<p>If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.</p>
<p>Object</p>
<p>COMMENT BOX 2B</p>
<p>Please enter your comments in the box below. Please state which Policy you are commenting on.</p>
<p>Policy Number: H6 Estate Regeneration</p> <p>We OBJECT to this policy on the grounds that, <i>in the present circumstances in RTW, no loss of existing affordable housing can be justified.</i> We understand the positive motivation for this policy in improving estate accommodation and would support it if, as a minimum, it were to include a provision that any net loss of existing accommodation would be made good by availability of equivalent accommodation in the same quarter of the town for anyone displaced. It should actually be possible to re-provide the same number of units on a site through intelligent planning even if other uses are also introduced.</p>

<p>COMMENT BOX 2A</p>
<p>If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.</p>
<p>Support</p>
<p>COMMENT BOX 2B</p>
<p>Please enter your comments in the box below. Please state which Policy you are commenting on.</p>
<p>Policy Number: H9 Housing for Older People</p> <p>We support this policy and strongly support the intention set out in Paragraph 6.344 to promote housing for older people being linked with general needs housing schemes creating a mixed and balanced community and community cohesion. For most older people, such mixed communities will probably be preferred to isolated retirement villages.</p>

<p>COMMENT BOX 2A</p>
<p>If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.</p>
<p>Support</p>

COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
Policy Number: H12 Build to Rent We support the safeguards to prospective tenants introduced into this policy.

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
Policy Number: H 14 Replacement Dwellings outside the LBD We support this policy.

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support + General Observations
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
Policy Number: H15 Residential Extensions We support this Policy but wonder how far it will be enforced in practice under present staffing levels. In paragraph 1 we suggest changing “roof form” to “form” which is more all-embracing. The proposed form of a building will always be significant but the roof form may not always be so, except in the case of conservation areas and in the setting of listed buildings and non-designated heritage assets.

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: H16 Extensions outside LBD</p> <p>We support this policy.</p>

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: H 17: Extensions to Curtilages outside LBD</p> <p>We support this policy which should restrict the extension of curtilages into the countryside with its tendency to a suburbanising effect, unless there are the specified reasons in the Policy which justify it.</p>

The Following commentary is given on the Employment Policies

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support
COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: ED 1 Key Employment Areas

We support the retention and, where appropriate, expansion/enhancement of existing employment areas to maintain a diverse economic base and to prevent RTW from over-reliance on commuting to provide employment for an increasing population. While we support expansion of the knowledge economy, there is also a continuing need to provide work for less well qualified members of the local community in light industrial B1/B2 uses.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number ED 2 Retention of Employment Sites

We strongly support this policy and the use of Article 4 Directions to ensure that well located and suitable office buildings should be retained in office use within RTW.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: ED 3 Digital Communications

We support this policy in a Borough that has a particularly high and still growing level of home working. It is important that digital infrastructure should be provided both to private and public sector housing.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: ED 7 Retention/Promotion of Tourist Accommodation

We support this policy as it is required to facilitate an economic policy supported by the Town Forum for developing Royal Tunbridge Wells as a destination town based on its historical, cultural, leisure and natural heritage. As climate change mitigation develops, there will be an increase in local tourism from the near continent and other parts of the UK and an increase in tourist accommodation will therefore be required.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: ED 9 Town Service Centres

We support this policy, particularly to prevent the over-concentration of particular uses such as fast food outlets in close proximity to one another.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: ED 10 Local Impact Thresholds

We support this Policy.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: ED 11 Primary Shopping Areas

We support this Policy and support the encouragement of conversion of first floor accommodation within primary shopping areas which is not required for retail/storage purposes to residential accommodation. Such conversions will tend to increase the vitality and night time safety of shopping areas and provide useful windfalls towards the housing targets.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support + General Observation

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: ED 12 Retention of Local Services

We strongly support this Policy which should help to ensure the vitality of Neighbourhood Centres within Royal Tunbridge Wells. Vibrant Neighbourhood Centres will be important in promoting active travel and reducing car journeys within the urban fabric of Royal Tunbridge Wells. We again make the case for aiming to provide primary education facilities within half a mile of target populations in densely developed parts of the town so as to eliminate car journeys for educational purposes. KCC should now face up to its responsibilities to deal effectively with the climate emergency in this respect.

The following commentaries are given on the Transport Policies

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support with conditions

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: TP1 Transport Assessments & Travel Plans

Policy TP1 needs strengthening:

- There is no inevitability about car ownership levels rising. Journeys by car are generated because the facilities for them are provided. The Local Plan should include an aim to reduce the need for car ownership and then implement policies to achieve that aim. Additional wording such as ***“All new development must demonstrate that active travel is prioritised over non-active travel”*** is needed to ensure that the Local Plan prescribes measures to put the Borough’s climate emergency resolution into effect across the whole Borough, including the rural areas.
- The words ‘active or sustainable’ need to be added in front of transport in the sentence "Where adequate transport infrastructure is not available to serve the development...".
- The reality is that the Highway Authority has limited powers and is rarely able to say that a development will cause a problem for the road network, because
 - each development is judged incrementally; and
 - the problems need to exist close to the development

The result is inadequate s106 funding for active travel. We suggest that it should be made explicit that developers’ responsibility for s106 contributions to support active travel solutions is not limited to locations near the development.

- The current methodology is still ‘predict and provide’, whereas the Borough Council could decide on appropriate levels of motor traffic within the Borough and take action accordingly. The Government’s Science and Technology Committee report of 22nd August 2019 on policies needed to meet the Government’s commitment to net-zero emissions by 2050 stated that *‘widespread personal vehicle ownership does not appear to be compatible with significant decarbonisation’*. The increase in car use which the local plan is seeking to accommodate is not compatible with the Government’s climate commitment, nor is it compatible with TWBC’ climate emergency declaration and aim to make the borough carbon neutral by 2030. ***Similarly to the policy that new developments have to show a net reduction in water outflow, the transport policy should state that all additional traffic movements have to be compensated by the developer funding infrastructure to enable motor traffic reduction elsewhere.***
- Although we welcome the requirement for travel plans to be produced for new developments, we are concerned that the thresholds based on m² do not reflect the scale of activity to be undertaken within or the likely number of employees and the number of HGVs and other vehicles attending the site daily. Further, use class D2 Stadia has a threshold of 1500 seats which is relevant to the proposed re-siting of the Culverden football stadium which may not be 1500 seats but should require a transport assessment for its proposed location. We should like to see some specified sanctions in the event of travel plans not being maintained in practice.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

Support with conditions

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: TP 2 Transport Design and Accessibility

We support the phrase 'safety for all users', but it is vulnerable road users – pedestrians and cyclists – whose safety must be prioritised above other road users and whose needs are currently relegated below those in motor vehicles – witness unsuccessful attempts to improve pedestrian safety features at Carrs Corner.

TP2 is too prescriptive in its adherence to specific guidance documents. The Manual for Streets (published 2007 and updated 2011) is now outdated and the Plan should instead refer to the latest second generation design standards the CROW manual (2017 edition) and/or the London cycle infrastructure design standards. Since this Local Plan has a 20 year life it seems unwise to prescribe by documents that are already over 10 years old in a fast changing transport environment. Furthermore, a one size fits all approach in the context of the constraints of the transport environment in RTW is not appropriate when better design advice is available. While the prescribed documents are an essential reference, officers should have the ability to reference other relevant advice as appropriate. We suggest therefore the text of TP2 should be amended from 'in accordance with' (specific *documents*), to 'with reference to (specific *documents*) and later guidance as appropriate.'

TP2 ignores the safety benefits to cyclists and pedestrians of 20mph speed limits introduced with or without other traffic calming features. Speed limits in new developments should be no higher than 20mph.

TP2 needs to ensure that new developments do not permit rat-running but ensure permeability for walking, cycling and sustainable travel.

The use of the phrase "swept path" should not be an excuse for unnecessarily wide 'bellmouth' junctions. The latest design standards emphasise junctions which have radii as tight as possible to ensure slow turning speeds and, therefore, safety and convenience for vulnerable road users, increasing the likelihood of people choosing active travel.

A Policy on Transport Design and Accessibility should specifically provide that storage areas for bicycles should be provided in all cases and that the areas should be covered, suitable and easily accessible on the level to encourage maximum use.

The phrases 'if located on' and 'development is accessible to all and permeable to all modes of transport, with priority to active travel' are too weak. Being accessible to all means that residents in a new development must be able to reach their destination by active or sustainable travel. The developer should pay for / make contribution to:

- Complete walking and cycling routes to likely destinations within (say) 2 miles. (E.g. Developers at Hawkenbury should have had to pay for / made substantial contribution to a route to the station / town centre);
- Contributions to walking / cycle routes in places which are likely to receive traffic from the new development. For example, improved cycling infrastructure on the Pembury Road from new developments in Paddock Wood; and/or
- Contribute to establishment and maintenance of bus routes to enable sustainable journeys of up to (say) 10 miles

There is a moratorium from the DfT on shared space. While it can work in certain circumstances and may be a useful compromise, the preference should always be to provide safe and convenient infrastructure for pedestrians and cyclists and public transport.

COMMENT BOX 2A

If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.

COMMENT BOX 2B

Please enter your comments in the box below. Please state which Policy you are commenting on.

Policy Number: TP3 Parking Standards

We broadly support the Residential Parking Standards Topic Paper and recognise that considerable work has gone into extracting data from the 2011 Census. However, we consider that much more evidence is needed about the total supply and demand for parking in Royal Tunbridge Wells at different times of the day and on different days. For example, not only is it recognised that there are many spare spaces in the Multi Storey Car Parks at present, but it is also true that at 'off-peak' times, MSCPs are frequently almost empty.

Parking needs to be considered as part of the overall policy to increase active travel. "Providing adequate parking" is exactly the type of policy which will ensure more car travel. More car parking => less dense developments => more land taken => more car use (distances are further). The Local Plan should give preference to developments that enable a reduction in car use.

We recommend a detailed study into the car parking needs of Royal Tunbridge Wells as a matter of urgency and the proposed parking standards should not be adopted within the Local Plan before the results of that study can be assessed.

However, we recognise that the constraints on parking within RTW are incorporated into TP3 and that the new zones A, B and C reflect different parking standards. So:

- We are concerned that some flexibility is needed beyond that stated. For example, RTW needs many more affordable homes which are likely to be 1 or 2 bedrooms for which one parking space is provided. This fails to take account of potential occupants such as tradesmen and service personnel whose workplace/office is often their van which may need to be parked near their home together with a family car thus 2 spaces.
- We are concerned that the table "Maximum Parking Standard Per Use Class" does not fully take account of the known trend in office design and technology to reduce office space per person. The UK average office space per person is now at 5sq m as a minimum. Using the Plan's standards without also recognising the likely occupier use and staffing levels results in under provision of onsite parking and the damaging overspill on street parking in residential roads as experienced in Hawkenbury.

We are concerned that use class D1 which includes schools is not included particularly as primary and secondary schools are required to be built to accommodate the growth in this plan period.

The words '*where possible*' in 'cycle parking where possible' should be deleted and 'encourage' should be replaced by 'enable'. We would recommend adoption of Cambridge City Council "Cycle Parking guide for new residential developments" February 2010 instead of Kent County Council's SPG4. This guidance includes provision of easy to access secure cycle parking for residential and commercial developments. All residential cycle parking should be sited in a manner that encourages the use of a cycle as first choice for short trips. It should always be placed as close as possible to the main entry/exit points with step free access.

The Policy should prevent EV charging points on pavements and prevent cables across pavements.

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Object
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
Policy Number: TP4 Public Car Parks While we endorse the findings of the Parking Topic Paper which shows that the current car park capacity in RTW is more than adequate with 1279 parking spaces empty on average every day, we strongly OBJECT to this policy. It requires that any proposed developments on existing car parks should replace all spaces lost in all circumstances. This goes against the Local Plan's ambitions for more walking and cycling, car club, cycle sharing and other schemes in RTW, and leads to the development of additional car parks in an already constrained area, adding to congestion and pollution unnecessarily, given the predicted changes in transport requirements within the Plan period.

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
Policy Number: TP 5 Safeguarding Railway Land We support this policy as necessary for future development of rail links to and from Royal Tunbridge Wells particularly from West Kent to the south coast and Brighton via Crowborough, Uckfield and Lewes and to London (Victoria/London Bridge/Canary Wharf) via Croydon and Lewisham. Such new fast public transport routes could have a significant positive impact in reducing commuting by car and on through car journeys for other purposes. The detail of the Policies Map needs to ensure that sufficient land is safeguarded to enable the future restoration of a double track railway with adequate passenger facilities at the West Station, which could become the main rail interchange for RTW. There is also a case for safeguarding the Hawkhurst to Paddock Wood branch line alignment in its entirety as a future transport corridor, inter alia for use for active travel in the Borough.

COMMENT BOX 2A

<p>If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.</p>
<p>Object and General Observations</p>
<p>COMMENT BOX 2B</p>
<p>Please enter your comments in the box below. Please state which Policy you are commenting on.</p>
<p>Policy Number: TP 6 Safeguarding Roads</p> <p><i>We strongly OBJECT to the proposal in TP6 to safeguard land for future improvement/widening of Halls Hole Road.</i> The use of this narrow road as a 'rat run' avoiding the Pembury Road at peak times has grown as a direct result of the installation of traffic lights at the Pembury Road end. These lights are themselves a main cause of the congestion that traffic on this 'rat run' seeks to avoid. In the recent past, Halls Hole Road and Cornford Lane simply provided access to remote hamlets and farms and could do so again to provide an active travel and leisure route between Pembury and RTW and also to Dunorlan Park. Cornford Lane/Halls Hole Road is part of Route 18 National Cycle Route from RTW to Canterbury which is planned to extend further west. Widening Halls Hole Road will only deliver increased traffic into Hawkenbury causing more danger and pollution for local pedestrians and residents.</p> <p>We reserve the right to review the proposals for the A228 and A21 when further detail is available at Regulation 19 stage.</p> <p>While we support the retention of the existing section of the A228 as an active travel corridor, this needs to be designed as a fast commuter route for cycling and provide a complete link from Tunbridge Wells to Paddock Wood. It will be no good as an active travel route if it just gets people through Colts Hill.</p>

The following commentary is made on retention of open spaces

<p>COMMENT BOX 2A</p>
<p>If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.</p>
<p>Support with Conditions</p>
<p>COMMENT BOX 2B</p>
<p>Please enter your comments in the box below. Please state which Policy you are commenting on.</p>
<p>Policy Number: OSSR 1 Retention of Open Space</p> <p>We support this policy but would want to ensure that in weighing the benefits or dis-benefits of any proposed alternative facility, the benefit of <i>retaining</i> a local amenity not reliant on motorised transport for access would be given significant weight.</p>

COMMENT BOX 2A
If you are commenting on a Policy, it would be helpful if you could mark the most appropriate answer.
Support + General Observation
COMMENT BOX 2B
Please enter your comments in the box below. Please state which Policy you are commenting on.
<p>Policy Number: OSSR 2 Provision of Publicly accessible Open Space</p> <p>We strongly support this policy and the intention to prepare an Open Space SPD. We support the explanatory note contained in Paragraph 6.547 to the effect that additional open spaces should normally be provided within new major developments. We feel that the reference to alternative provision mentioned in Paragraph 6.548 should clarify what could be considered "<i>conveniently and safely accessible</i>". Only in exceptional circumstances should an alternative open space be considered conveniently and safely accessible if it cannot be realistically accessed by active travel.</p>

COMMENTS ON THE VISION (SECTION 3)

COMMENT BOX 3
Please enter your comments on the Vision in the box below.

Formed in 2005, the Royal Tunbridge Wells Town Forum is the voice of some 50,000 residents in the unparished area of Royal Tunbridge Wells. The Town Forum contributed detailed views and proposals during development stages of the Regulation 18 Draft Plan through publication of our Response to the Call for Sites Consultation in 2016, our Vision Statement for the town of Royal Tunbridge Well in 2017, our Response to the Consultation on Issues and Options also in 2017 and through our 2015 report “Developing our Green Network” and 2013 report “A Place of Pleasure and Resort” on developing tourism and culture in the town. These documents have been made available to TWBC with this response.

It is Town Forum policy that development should prioritise brownfield sites and only proven exceptional circumstances should justify encroachment into the surrounding Green Belt and AONB. Similarly, the exceptional historic fabric of the town calls for the greatest sensitivity towards heritage assets in considering any adjoining built development. Our comments should therefore be read against this policy background.

A strategic document such as the Local Plan should attempt to institute long term policies flexible enough to adapt to foreseeable trends in lifestyle choices in relation to housing type and location, transport mode, schools location, parking and retail provision.

For Royal Tunbridge Wells this should involve, inter alia:

- Retaining clear, sustainable boundaries to the town so that suburban sprawl does not arise and all residents have safe walking or cycling access both to the town centre and to the open countryside
- Urgently tackling the present atmospheric pollution which particularly threatens the health and wellbeing of children and the elderly and also noise pollution
- Overcoming the present problem of road congestion by enabling modal shift away from private motor cars, ending rat-running in residential streets, ending the “school run” through modal shift and more accessibility to local schools and working with local employers to encourage active travel and alternative travel arrangements
- Maintaining the historic fabric and semi-rural setting of the town which contributes to the general wellbeing of its residents and offers considerable future tourism potential
- Maintaining sufficient local employment sites for all sectors of the population of RTW and further enabling employment in the town’s specialist fields of education, health, law and insurance and technology to reduce the risk of RTW becoming a dormitory town
- Ensuring that any new housing development meets proven housing **need**, including the 50% element for affordable housing and is not primarily market-driven as has too often been the case under the existing Local Plan

We have welcomed the extent to which the Town Forum has been kept informed by Planning Policy Officers at all stages of the preparation of the Regulation 18 Draft and find that many of the specific policies in the Draft broadly meet our own objectives for the town as summarised in our comments in sections above.

Officers have faced an exceptionally difficult task in attempting to meet excessive government imposed housing targets while aiming for as little harm as seems reasonably practicable in these unusual circumstances to the valued natural and historic fabric of the Borough and of Royal Tunbridge Wells, which the Draft should seek to protect. They have succeeded to an extent in the policies affecting Royal Tunbridge Wells.

However, ***Town Forum policy is that development in the AONB and Green Belt should take place only on proof of exceptional circumstances.*** The greater the proportion of a district that consists of protected Green Belt and AONB areas, the less scope there should be for development in that district. Any evidence put forward of exceptional circumstances will therefore have to satisfy the Inspector at Examination in accordance with relevant legal precedent. We hope that some incursions into Green Belt and AONB can be reduced.

In the very difficult circumstances of the current unsatisfactory relationship between Central Government and Local Authorities, and subject to the important caveat above, we are broadly supportive of most of the sites now selected for allocation in the unparished area of Royal Tunbridge Wells, subject in many cases to conditions. We also strongly support decisions taken on those submitted sites deemed *unsuitable* for allocation as set out in our comments in **Appendix 6**. Full comments on sites proposed for allocation appear in our response to the **AI/RTW Policies** ante

COMMENTS ON THE STRATEGIC OBJECTIVES (SECTION 3)

COMMENT BOX 4
Please enter your comments on the Strategic Objectives in the box below.

STR3 Masterplanning and use of compulsory purchase powers

We strongly support the masterplanning approach as against the failed policy of “Areas of Change” under the present Local Plan. Although the Council is to have a greater input, it is still implied that the developer will be responsible for the masterplanning, which does not appear to us to be an optimal approach.

The greater use of compulsory purchase powers, where appropriate, is also supported in the context of a masterplanning approach to major developments in RTW and elsewhere in the Borough.

Policy STR 4 Green Belt

The release of Green Belt land around RTW should only occur in exceptional circumstances but may prove legally impossible to avoid altogether given the targets for development imposed by the Central Government. Insofar as releases of Green Belt do prove unavoidable to meet Plan objectives, we favour an approach that results in the release of the least damaging parcels of land in landscape, heritage and nature/wildlife conservation terms, taking full account of the evidence base. In that context we strongly support the Council’s decisions against allocation of the most damaging sites as set out in Appendix 6. If there should be any change in government policy, or developments in interpretation of the NPPF provisions, prior to the Regulation 19 Draft going out to consultation, we hope that a review of the proposed releases from Green Belt would take place, in case they may be minimised further.

With regard to remaining Green Belt land, the proposed policy that the Council will merely “consider” a development proposal in the remaining Green Belt against GB policy in the NPPF seem weak and should be strengthened to the maximum extent which can be upheld at Examination. The present wording contrasts with the aspiration to “enhance” remaining Green Belt expressed elsewhere in the Draft.

Policy STR 5 Essential Infrastructure and Connectivity

The requirement that developers should contribute sums satisfactory to the Council when their development creates a need for new or improved infrastructure is strongly supported though we have doubts as to how adequate contributions will be in practice. The policy provision for effective monitoring paid for by the developer seems a considerable improvement over current practice.

Provisions on education, health and water appear imprecise. Although it is recognised that TWBC is not the lead authority in respect of any of these services, we believe that it should draw attention to the lack of joined up thinking by some responsible Authorities such as KCC, for example by continuing to follow school siting policies that substantially increase traffic congestion in RTW with the resulting damage to public health and the urban environment.

The new provisions on green, grey and blue infrastructure are supported but It will be essential for adequate funds to be secured from all available sources, including from developers, to make these provisions a reality.

Policy STR 6 Transport and Parking

While broadly supporting the modal priorities set out, we would take issue with the implication that non-commercial electric vehicles may be considered a sustainable mode of transport. This is currently open to much doubt as they may merely perpetuate existing modal choice at a quite high environmental cost in terms of electricity generation and air pollution from tyres.

In **Paragraph 3** mention should be made also to rail access to Brighton, the South Coast and Croydon to take account of possible development of the BML2 route proposal.

In relation to **Paragraph 8**, the Rural Lane network is inherently unsuitable for intensive use by motorised transport and, in stating that the network should be enhanced to ensure that it is convenient and safe for users, the first priority should be given to pedestrian, cyclist and equestrian users, other traffic being discouraged and subject to traffic calming.

COMMENTS ON FIGURE 4: THE KEY DIAGRAM (SECTION 4)

COMMENT BOX 5
Please enter your comments on the Key Diagram (Figure 4) in the box below.
We have no particular comments.

COMMENTS ON A TABLE

COMMENT BOX 6
Please enter your comments on a table in the box below. Please state which table number you are commenting on.
Table Number: We have no particular comments

COMMENTS ON AN APPENDIX (Appendices 1-4)

This comment box should be used for comments on Appendices 1-4. If you are commenting on Appendices 5 or 6, please use the separate comment boxes below (Questions 8 & 9).

COMMENT BOX 7
Please enter your comments on an Appendix (Appendices 1-4) in the box below. Please state which Appendix you are commenting on.

Appendix Number: 1

We strongly support the inclusion under the protections contained in Draft Policy EN 12 of the following LWS sites in RTW: TW21/22/23; TW45/46/48; TW24 and TW58. We strongly support similar inclusion of RNR sites: TW09 and TW13. We strongly support similar inclusion of SLNCV sites ID03/ID18/ID07/ID08/ID13/ID19 and LNR status Barnett's Wood. We would support the addition of Greggs Wood town green and Knight's Wood to Local Nature Reserve status.

Appendix Number : 2

We support the inclusion of all eligible sites across the Borough and welcome the added protection that designation as a Local Green Space will bring.

Appendix Number: 3

We have no specific comments to make in addition to those already made in relation to numbered policies in the Draft.

Appendix Number: 4

The glossary is a very useful inclusion which might be worth also separately posting on the Planning pages of the TWBC website.

**COMMENTS ON TOPIC PAPERS AND OTHER SUPPORTING DOCUMENTS
(APPENDIX 5)****COMMENT BOX 8**

Please enter your comments on a topic paper or other supporting document in the box below. Please state which topic paper or supporting document you are commenting on.

Topic Paper or supporting document title: SHELAA Site Assessment sheets for Royal Tunbridge Wells

We previously submitted detailed comments on a number of the sites submitted under the Call for Sites which might become subject to an allocation. ***We set out those comments again under each specific AL/RTW Policy in relation to the sites now proposed for allocation in the Draft. So far as sites which were considered unlikely to be allocated and have now not been allocated for future development, we set out our comments in Appendix 6.***

Town Forum policy is that development in the AONB and Green Belt should take place only on proof of exceptional circumstances. Any evidence put forward of exceptional circumstances will have to satisfy the Inspector at Examination in accordance with relevant legal precedent. In the very difficult circumstances of the current unsatisfactory relationship between Central Government and Local Authorities and subject to the important caveat above, we are broadly supportive of most of the sites now selected for allocation in the unparished area of Royal Tunbridge Wells, subject in many cases to conditions. We also strongly support decisions taken on those submitted sites deemed *unsuitable* for allocation as set out in our comments in **Appendix 6**. Full comments on sites proposed for allocation appear in our response to the **AL/RTW Policies** ante.

This is subject also to the caveat that ***we do not agree with the method by which Central Government calculates housing need and the consequent target housing numbers.*** In particular, the Office for National Statistics produced a revised 2016 methodology, which in the case of Tunbridge Wells Borough would require only 67% of the 2014 figure, according to some analysts. The government-imposed methodology and fears of the Draft Local Plan being found unsound at Public Examination have perhaps led TWBC not to seek fully to exploit potential constraints recognised by the NPPF in relation to the 70% of the Borough which is classified as AONB and the 22% which is classified as Metropolitan Green Belt and also infrastructure constraints such as acknowledged severe existing water stress and problems with waste water treatment.

The approach taken in this Regulation 18 Draft has resulted in some draft allocations in RTW and elsewhere in the Borough which are intrusive into Green Belt and AONB. We would therefore urge TWBC to ***keep carefully under review the legislation and any legal precedents and Inspectors' decisions arising under the legislation in the period up to submission of the Regulation 19 Draft in relation to exceptional circumstances and housing need methodology, in case some mitigation of proposed incursions into the AONB and Green Belt may be possible.***

Topic Paper or supporting document title: Infrastructure Delivery Plan

Please see our comments on infrastructure delivery in relation to individual Policies above

Topic Paper or supporting document title: Transport Strategy Review

Please see our comments under the TP Policies above.

Topic Paper or supporting document title: Transport Study

Please see our comments under the TP Policies above.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: Site 7 Montacute Gardens

We support the conclusion that the site is presently unsuitable for development.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: Site 12 Tunbridge Wells West to Grove Junction

We support the conclusion that the site is unsuitable for development. It is vitally important to the long term strategic development of a sustainable transport policy for the Borough and for Royal Tunbridge Wells in particular, that the full double track alignment of the safeguarded railway route from Grove Junction to the West Station and onwards to Eridge should be protected, to allow for future restoration of public passenger rail services.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: Site 30 Caenwood/Whitgates Farm Reynolds Lane

We support the conclusion that this Green Belt site is unsuitable for development. The site is of significant landscape value and acts as buffer to the adjacent AONB and the setting of the historic house and Park at Salomons. It also acts as the only remaining tract of open land preventing coalescence of RTW and Southborough and is part of a Local Wildlife Site. There are very significant highway issues with the AQMA in Southborough/Tunbridge Wells on the A26.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: Site 39 Land adjoining Dunorlan Park

We support the conclusion that this Green Belt site is unsuitable for development. In the 2015 Royal Tunbridge Wells Forum document “Developing our Green Network” we suggested that this parcel of land should be considered for incorporation in Dunorlan Park if the necessary funds could be raised.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: Site 61 Robin Gate Blackhurst Lane

We support the conclusion that this Green Belt site is unsuitable for development.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 73 Land South of Pembury Road

We support the conclusion that the site is unsuitable for development. It lies in the AONB and the southern parts of the site would have a significant adverse landscape effect if developed. There are also highway issues.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 99 Land north of Pembury Road

We support the conclusion that this Green Belt site is unsuitable for development. This site constitutes an important landscape approach when arriving in Royal Tunbridge Wells from Pembury Road. It is even more significant when leaving RTW as it clearly marks the point at which the settlement ends and prevents coalescence with Pembury.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 100 Land adjacent to Whitegates Close

We support the conclusion that this Green Belt site is unsuitable for development, notably on account of highway concerns and proximity to the AQMA.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 114 Land at Sandown Park

We support the conclusion that this Green Belt site is unsuitable for development, particularly the southern section, on landscape and highway concerns.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 116 Land south of Pembury Road

We support the conclusion that the site is unsuitable for development. It lies in the AONB and the southern parts of the site would have an adverse landscape effect if developed. There are also highway issues.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 165 Pantiles Car Park

We support the conclusion that the site is unsuitable for development. It would be inappropriate to allow any built development on a site which is an integral part of Tunbridge Wells Common in a particularly sensitive location and important to the semi-rural setting of Royal Tunbridge Wells. Tunbridge Wells Common is a Local Wildlife Site and also an important place for green recreation.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 199 Land at Smockham Farm

We support the conclusion that this Green Belt site is unsuitable for development. The site is centred around a characteristic Wealden Farmstead of considerable antiquity and crossed by a non-designated heritage asset in the form of an ancient routeway which provides a recreational footpath linking the St John's area of RTW with the Woodland Trust owned Hurst Wood, Rusthall and Speldhurst.

Within the Farmstead is another non-designated heritage asset, a 19th century steam powered pumping station and underground reservoir for supplying water to the former Kelsey Brewery on St John's Road. There are mediaeval assart fields and the whole site forms an important part of the setting of Royal Tunbridge Wells. It is close to Local Wildlife Site TW46 and Sites of Local Nature Conservation Value ID 08 and ID13 and development would be prejudicial to these sites.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 205 Land at Little Knoll Reynolds Lane

We support the conclusion that this site is unsuitable for development for landscape, highway and ecological reasons as part of a wider landscape in a Green Belt area which prevents coalescence of RTW and Southborough. It is close to Local Wildlife Site TW46 and Sites of Local Nature Conservation Value ID 08 and ID13 and development would be prejudicial to these sites

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 226 St Marks Recreation Ground Frant Road

We support the conclusion that the site is unsuitable for development as it would result in the loss of a useful sports facility and because it sits on a landscape edge of RTW.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 258 TN2 Community Centre

We support the conclusion that the site is unsuitable for development. It should be retained as a community centre and maintained as such in the event that further plans may materialise in the future.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 280 Land at Midway Nevill Court

We support the conclusion that the site is unsuitable for development. It is Green Belt land and adjoins open countryside to the south west and to the east the iconic Arcadian parks and semi-rural setting of Hungershall Park and Nevill Park and to the west the 20th century parkland development of Nevill Court, which together form one of the jewels in the crown of Royal Tunbridge Wells' parkland developments. All would be adversely affected by any further development in the area.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 328 Land at Eridge Road

We support the conclusion that the site is unsuitable for development and should be retained as an important open space for the Ramslye estate and as a landscape approach to the town centre.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 359 Land to east of Kingswood Road

We support the conclusion that this Green Belt site is unsuitable for development being part of the setting to the adjoining Dunorlan Park.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 384 Land at Great Bayhall

We support the conclusion that the site is unsuitable for development. This AONB open farmland forms part of an iconic vista to a rising undeveloped horizon when viewed from the historic Dunorlan Park and the contrast between the formal parkland and the unspoilt countryside beyond is one of the defining features of this significant edge of RTW.

It is also a significant landscape feature crossed by the High Weald Landscape Trail and Tunbridge Wells Circular walk and High Woods Rural Lane which are important to health, recreation and tourism in the town and the Borough as a whole. It is also a significant landscape feature visible from Cornford Lane, another Rural Lane, which has sweeping far reaching views over this site to horizons to the east at Pembury and south west at Hawkenbury.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 400 Land to the east of Kingswood Road

We support the conclusion that this Green Belt site is unsuitable for development. In the 2015 Royal Tunbridge Wells Forum document “Developing our Green Network” we suggested that this parcel of land should be considered for incorporation in Dunorlan Park if the necessary funds could be raised.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 434 Tutty’s Farm Hawkenbury

We support the conclusion that the site is unsuitable for development. This Green Belt site adjoining the AONB sits in the middle of a fine landscape closed to the south west by Benhall Wood and is very visible from Hawkenbury Road. No further development should be allowed to occur on this far side of Hawkenbury Road.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 457 Land adjacent to Tutty’s Farm

Details seem to have been omitted from the SHELAA but the same comments would apply as in the case of site 434

Although the following sites are outside the unparished area of Royal

Tunbridge Wells, we make the following commentary on the basis that these un-allocated sites are important to the setting of Royal Tunbridge Wells and/or also serve to prevent the coalescence of RTW with other settlements

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 146 (Rusthall) Tunbridge Wells Golf Course

We support the conclusion that this Green Belt site is unsuitable for development. This site provides an important wildlife corridor to and from nearby Hurst Wood linking into the Rusthall Common. It maintains an attractive setting to the edge of Royal Tunbridge Wells and prevents coalescence between the settlements of RTW and Rusthall.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 384 Land between Cornford Lane & Pembury Bypass

We support the conclusion that the site is unsuitable for development. This very large site is a visually prominent part of the AONB viewed from Cornford Lane and it marks the new boundary for Pembury formed by the A21 bypass, which was set into the landscape so as to be invisible from Cornford Lane and other parts of the nearby AONB. It also maintains a completely rural feel to the landscape adjoining Royal Tunbridge Wells and is an important landscape feature.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 49 (Capel) Land at Castle Hill Farm

We support the conclusion that the site is unsuitable for development. The western part of this site is AONB and Green Belt, part of a key landscape approach to RTW from the north and is visible not only from the railway line but also from the Tunbridge Wells Circular Walk. It is Town Forum policy to seek to maintain the integrity of this high quality landscape as the most significant green gateway to the urban area and a clearly visible barrier to coalescence of RTW with Tonbridge.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 62 (Capel) Land south of Devils Wood

We support the conclusion that the site is unsuitable for development. This site is AONB and Green Belt, part of a key landscape approach to RTW from the north and is visible not only from the railway line but also from the Tunbridge Wells Circular Walk. It is Town Forum policy to seek to maintain the integrity of this high quality landscape as the most significant green gateway to the urban area and a clearly visible barrier to coalescence of RTW with Tonbridge.

COMMENT BOX 9

Please enter your comments on any sites submitted through the Call for Sites that have not been included in this Draft Local Plan. Please state the Site Number and Site Address.

Site Number and Site Address: 77 (Capel) Land adjacent to Forest Farm

We support the conclusion that the site is unsuitable for development. This site is AONB and Green Belt, part of a key landscape approach to RTW from the north. It is Town Forum policy to seek to maintain the integrity of this high quality landscape as the most significant green gateway to the urban area and a clearly visible barrier to coalescence of RTW with Tonbridge. The northern part of the site, which is an open field, is one of the rare places in the area where it is still possible to hear the song of skylarks.

END OF COMMENT BOXES