



## **Response to TWBC Call for Sites Consultation**

### **Executive Summary and Conclusions**

In July 2008 the Royal Tunbridge Wells Town Forum submitted proposals to the previous TWBC Call for Sites. We now repeat this exercise in relation to the new Local Plan 2013-33. We do not have rights of access to private property, nor to ownership or valuation records. The analysis and suggestions below are simply intended to assist in development of TWBC's Key Issues and Options stages.

The TWBC Strategic Housing Market Assessment 2015 (SHMA) identifies an Objectively Assessed Need (OAN) of some 648 housing units per annum in the Borough as a whole, more than double the existing Local Plan target. We question the assumptions behind this assessment. If continued throughout the new plan period this could result in an increase in housing stock of some 9720 units and a population increase of up to 20,000 (well over 25%) in Royal Tunbridge Wells and Southborough alone if the present percentage allocations to different towns in the Borough were maintained.

Such an increase would fundamentally change the character of Royal Tunbridge Wells requiring building in broadly the whole of the existing Green Belt in addition to denser town centre development, some of which would threaten the heritage fabric of the town. This is not considered a sustainable option as it would also have significant implications for schools, utilities and transport infrastructure, adding massively to the existing acute traffic, congestion, atmospheric pollution and parking problems in the town. The theoretical OAN should therefore be moderated by the above constraints as is provided for in the National Planning Policy Framework (NPPF).

While the clear need is for Affordable Housing (not least for key public sector employees, policemen, teachers and NHS staff required to support the population) the SHMA relies unconvincingly on market housing to cater for most future housing need. Market housing will tend to draw in new residents from outside the area instead of providing for proven rather than theoretical need.

The SHMA points out that employment has flat-lined in the town over the last 25 years and that forecasts of 16.8% growth in the next 20 years based on government models may not be reliable. This is all the more likely as conversion of offices to residential units continues apace and a number of industrial sites have already ceased in that use and others are allocated to do so under the existing Local Plan. Without substantial new allocations of employment land, it seems unlikely that the town will see significant employment growth and this should influence the computation of housing numbers.

We consider in our response some of the key issues which should inform the development of the Local Plan. We warn against any further major sequential development in a town that is already bursting at the seams. Similar problems of sequential development afflict some other settlements in the Borough so we support feasibility studies into whether a Garden Village or Villages, preferably situated in close proximity to existing or re-opened railway

lines, could deliver an increase in housing realistically related to actual housing need and put an end to “planning by appeal”.

For the longer term we identify a number of sites in the town centre and in the existing Rural Fringe which might assist in the sustainable development of the town in the later years of the new plan period if infrastructure constraints and current lifestyle issues can be successfully tackled over the next 20 years. We propose four further Areas of Change where development according to a Masterplan could be envisaged, at the old West Station, in the area centred on Meadow Road/Grosvenor Road, in the area comprising Chapman Way/High Brooms brick quarry and the former refuse tip and in a refinement of the existing Area of Change on Crescent Road/Monson Road.

### **In Conclusion:**

1. The “objectively” assessed housing need for the Borough could require unsustainable growth in a town where planned growth levels under the existing Local Plan are already challenging. Growth significantly above this could threaten both the Green Belt and the historic fabric of RTW.
2. Moderating the figures will require assessment of potential sites, mainly nominated by developers, which can take up to two years. In the meantime the town and Borough will be vulnerable to opportunist applications for market housing, as has been demonstrated in recent planning appeals.
3. This pressure for market housing makes it difficult to achieve the necessary levels of affordable housing. There is a need for additional public social housing in the town which present national policies are unlikely to deliver;
4. Sustainable growth requires land for housing and ancillary uses including employment and infrastructure which are already under strain, with increases in travelling out to work and resulting road and rail congestion. We should avoid sequential development in a town that is already bursting at the seams;
5. Failure to provide sufficient sustainable sites for primary education adds to these congestion problems and is a further constraint to be considered. Part of the solution to the “school run” will lie in the development of infrastructure and active travel plans for safe walking and cycling routes;
6. Optimising the supply of appropriate sustainable sites will require intervention by TWBC in consultation with other public authorities to ensure the most suitable use of sites including those in public ownership. A proper assessment of developer-nominated sites will require explicit policy criteria to be developed and applied in relation to any future growth in RTW;
7. As a contribution to the debate about sustainable sites for long term growth later in the new plan period, the RTW Town Forum proposes 4 Areas of Change where sustainable mixed-use development could be possible, and also possible development of sustainable Garden Villages in the Borough.

## A. Putting Proposed Housing Growth in context: The Key Issues

### 1. Employment

The TWBC Strategic Housing Market Assessment 2015 (SHMA) states that employment in the Borough has been virtually static since 1993. According to the SHMA, the East of England Forecasting Model, which Local Authorities are required to use, forecasts “*higher growth...than has been seen historically*”. Consequently the SHMA raises doubts about the reliability of the model which postulates up to 16.8% employment growth. It recommends that the council conduct a “*review of economic growth potential... through preparation of economic employment land studies and if appropriate consider updating the assessment of Objectively Assessed housing Need*”. One may infer that this might require a *downward* revision of OAN.

The SHMA report then moves on to other topics but the worries it expresses concerning the reliability of statistical methods should set alarm bells ringing with regard to the sustainability of any new housing postulated on employment growth which has not materialised in Tunbridge Wells over some 3 decades.

It is arguable that the situation for future sustainable employment is significantly worse than considered in the SHMA:

- National policy allowing virtually untrammelled conversion of office accommodation to C3 Residential use is already having a major impact in Tunbridge Wells town centre with examples including Union House and properties on the Belvedere Estate, with further conversions likely, for example the accommodation soon to be vacated by Cripps in Mt Ephraim Rd
- Manufacturing and “distribution” type jobs and the sites on which they may be based are also disappearing or set to disappear at the Dairy Crest and Arriva depots, BT engineering depot and Turners factory with smaller “windfall sites” currently providing employment also likely to disappear.
- While there may be a welcome growth in some major retail sites such as RVP, the accelerating trend towards internet shopping suggests that retail employment overall is likely at best to be static through the new Plan period.

In this context the 10,000 extra jobs anticipated for the Borough by 2033 seem rather unlikely to materialise unless a significantly different strategy is adopted. In Tunbridge Wells and Southborough it is also difficult to see where those jobs could easily be sited. There may be continued growth in home working (already high at 8,177 out of 57,630 workers in the Borough) but it is also likely that there will be a significant increase in out-commuting from the Borough and, of this increase, the largest part will be from Tunbridge Wells and Southborough.

Projected future employment patterns would therefore be likely to place further strain on road and rail infrastructure in the area at peak times, without taking into account any further increase in projected population and the strain this will also place on infrastructure. However there is considerable scope for TW, with its large pool of local highly qualified labour, to attract higher added-value employers if suitable sites could be found.

There is another counter-balancing opportunity to which little attention is still paid and that is the opportunity to turn Royal Tunbridge Wells’ green and heritage assets to employment advantage through strong promotion of leisure and recreational employment beyond the

already well-provided catering trades. Changing economic, geopolitical and security situations make an expansion of home-based tourism a realistic future scenario in England. Leisure and recreational businesses spanning cultural activity, hotels and tourism, sport and green recreation such as rambling, cycling and equestrian pursuits offer the opportunity of employment to the whole range of abilities in the town from unskilled manual to higher managerial functions. They would mostly be sited in existing locations or locations not competing with housing or office need and their clients would not create additional road congestion at peak hours.

## **2. Demographic and housing need assumptions**

As with employment growth predictions, local planning policy is constrained by national statistical methods and assumptions. These are questionable, being largely built on “predict and provide” criteria extrapolating from past trends, but it seems not to be open to a Local Authority to challenge them. Thus the population of the Borough is predicted by the SHMA to rise from 115,693 in 2013 to 134,903 in 2033 and the number of households from 48,032 in 2013 to 60,158 in 2033, a 25% increase which is above that in neighbouring areas, all of this set against a possible flat employment situation in the Borough and great long term uncertainty in the World economy.

It is this predicted growth in the number of households which is largely responsible for the astonishing rise in the Objectively Assessed housing Need (OAN) from some 300 dwellings per year under the 2006 Local Plan to around 648 per year advocated in the SHMA. Assumptions underlying the predictions include:

- A continued trend towards family break up, even though the maintenance of two households may become yet more financially burdensome than at present for families, to a point where alternative solutions are sought
- Major trend for increased elderly single-person households although the overall economic factors (and in particular failing pension systems) may well make this trend less financially sustainable for the individuals concerned
- Assumptions and guidelines over what constitutes “overcrowding” based on a socio-economic model which is based on the world of the 1960s and at least as questionable as the above assumed trends
- Assumptions about household formation among younger generations who may never again have the relative financial resources to support separate households unless housing costs diminish significantly. Insofar as house-building remains preponderantly financed and undertaken by commercial enterprises, such dramatic falls in the value of new properties is unlikely to materialise.

Tunbridge Wells Borough may be required in future to provide not just a 5% but a 20% safety margin or “buffer” in its 5 year housing supply figures. This would further distort the required over-provision of housing so that, far from meeting objectively assessed need, the extra market housing built would be occupied by those moving in from outside the Borough. One only has to consider the advertising of the new Knight’s Wood development to appreciate that this is in part angled at potential purchasers from outside the Borough and not to meet the OAN.

Public examination of the 2015 Site Allocations Development Plan Document (SADPD) has shown the projected housing supply of some 300 dwellings per annum across the Borough to be achievable. The 648 dwellings per annum projected in the SHMA is an unadjusted

figure and within the finally established figure, the percentage allocation to RTW and Southborough also has to be agreed. While sceptical of the OAN figures and sceptical about the possibility of substantially increasing supply in RTW/Southborough over the 300 figure, given infrastructure and Green Belt constraints, we identify on the map at appendix A some sites where additional provision may be feasible in later stages of the new Local Plan.

### 3. Affordable Housing

The SHMA finds that gross Affordable Housing need represents up to 54% of total housing need in the Borough but goes on to try to finesse these figures both to reduce them and to seek to show that it may be possible to provide for the need through continuation of a 35% Affordable Housing requirement on market housing schemes of 10 or more dwellings. However, in practice, many market housing schemes which have come forward under the current Local Plan have successfully reduced their allocation of Affordable Housing by pleading commercial un-viability of the 35% figure.

At a national level, ONS statistics (table 224 house building by tenure series) show that there has been a steady fall in provision of new affordable housing by Local Authorities and Housing Associations since the end of the 1970s. The figures also show the inherent inability of market housing to meet housing need since the Second World War, which should not be a surprise when so much need is for affordable social housing.

	Market housing	Public housing
1950-1959	82,261	150,894
1960-1969	177,594	123,546
1970-1979	141,303	116,235
1980-1989	136,249	44,068
1990-1999	124,704	25,716
2000-2009	127,947	18,999
2010-2014	87,628	25,196

In 2013/14 Housing Benefit cost the Exchequer £23.8bn, about 30% of the entire welfare budget. The total cost of constructing dwellings produced by the public sector in the same period was around £4bn. There would be benefits to the public purse nationally and locally for the public sector to reduce revenue subsidies by producing more dwellings, thus reducing rent levels and then releasing more funding for public sector new build. Such affordable housing also tends to meet genuine local need rather than promoting sometimes unjustified provision of particular types of housing to meet desire patterns rather than needs.

### 4. Retail Provision

Now that the grandiose and unrealistic plans for retail development of the 2009-10 era have gone away, we are reasonably confident that the existing allocations in the current Local Plan will be adequate to meet future need and that the market will determine whether these allocations are taken up. These allocations and any future additional need can be reviewed regularly during the new plan period.

## **B. Key Constraints on further development in Royal Tunbridge Wells**

### **1. Green Belt and AONB retention**

The public examination of the SADPD proved to the Inspector's satisfaction that the existing Rural Fringe, reviewed as part of the SADPD process, was sufficient as a buffer to specifically allocated sites in the longer term, to meet foreseeable housing supply needs identified in the SADPD through to 2026 and beyond.

This did not take account of new hypothetical "need" figures in the SHMA. However, we trust that the bald figures for "housing need" as identified in the 2015 Strategic Housing Market Assessment (SHMA) will be successfully mitigated by TWBC Planning Policy Officers arguing the high percentage of Green Belt and AONB in the Borough and also problems of inadequate infrastructure. Similarly it is clear that the final percentage allocation of new dwellings to Royal Tunbridge Wells and Southborough must be massively reduced relative to the 70-75% % under the 2006 Local Plan, (of which all but a handful have in fact been built in RTW). On a worst case scenario this could otherwise mean over 9720 new dwellings allegedly being "needed" in the two towns by 2033.

With regard to the Green Belt, the Inspector at the public examination into the SADPD was satisfied that there need be no encroachment into the Green Belt or AONB during the life of the present Local Plan. He did not support any of the landowners of land within the Green Belt who had asked him to reconsider the refusal by planning policy officers at TWBC to include their land among the sites allocated for development.

Green spaces help create a sense of place. Tunbridge Wells is set within the surrounding Area of Outstanding Natural Beauty (AONB) which laps at its edge. We are privileged to have inherited such a location and it is important to preserve the landscape setting of this surrounding AONB by proper stewardship of the areas of high quality Green Belt countryside on the edge of the town which feather imperceptibly into the AONB, some of which were formerly categorised as Special Landscape Areas. This will allow us to maintain the high visual, amenity and cultural value of our landscapes within the town and on its perimeter, something which in no small part contributes to the economic health of the town. A strong sense of place shared by a whole population through such stewardship also generally brings benefits of greater social cohesion and crime reduction as is testified by the recent surveys undertaken by TWBC into local perceptions of security and wellbeing.

In consequence of the above we believe that our existing Green Belt should be accepted as a constraint to development in accordance with footnote 9 to Paragraph 14 of the National Planning Policy Framework such as to override considerations based on a mechanical calculation of housing "need". The new Local Plan should proceed on the basis of maintenance of the existing Green Belt, though designation of parts of it for Green Belt compatible uses should not be ruled out (eg playing fields, allotments, country parks and compatible outdoor pursuits).

While we would hope to see significant reductions in the prospective housing targets for the town, we accept that some new housing additional to the SADPD figures may be considered necessary before the end of the new plan period and some of it could be provided in the existing Rural Fringe if current traffic and educational problems can first be resolved. Much of this is publicly owned land and there is scope for a pro-active approach to facilitate its

redevelopment if a proven need is later established. We have identified some potential sites on the map at appendix A. The Rural Fringe site at the former refuse tip is eminently suitable for development of light industry, thus releasing equivalent land within the existing LBD for redevelopment for affordable housing.

## 2. Transport and infrastructure provision

Congestion, parking problems, rat-running and atmospheric pollution in RTW have reached unsustainable levels and must be successfully tackled before any further population growth is contemplated. However, subject to concerns expressed about the dangers of sequential development, some long term densification of the existing accommodation footprint may be acceptable if accompanied by development of infrastructure and active travel plans for safe walking and cycling routes and better public transport provision. Towns and cities with higher density populations need proportionally less infrastructure than those with sprawling suburbs.

As far as transport is concerned, our recommendation would be that a site should not be approved for development unless it meets two tests:

- i) Is it consistent with an integrated transport plan?
- ii) Does it help rather than hinder active travel?

Kent County Council's (KCC) Active Travel Strategy aims to make active travel an attractive and realistic choice for short journeys in Kent. By developing and promoting accessible, safer and well-planned active travel opportunities, this Strategy will help to establish Kent as a pioneering county for active travel.

Tunbridge Wells Borough Councils' Transport Strategy has agreed a vision containing three main aims:

- *Tunbridge Wells Borough to benefit from a network of higher quality, better integrated, sustainable transport solutions and infrastructure, that will enable the Borough to solve existing and future transport challenges, and enable a vibrant, prosperous economy and inclusive communities.*
- *By 2026, Tunbridge Wells will have a transport network which is less reliant on the private car, with a greater mode share towards walking, cycling and public transport, especially for shorter journeys. However, it is recognised that some journeys will continue to necessitate use of the private car, especially in rural areas.*
- *The Borough will have a safer environment for all road users, and its air will be cleaner with more low emission vehicles and bicycles sharing road space.*

The town is cut into four quadrants by road transport links that run (roughly) north-south (A26 and A267) and east-west (A264) and motor traffic should be focussed on those roads. On all other roads within the quadrants, priority should be given to walking and cycling, including the implementation of 20mph limits on all residential streets and the town centre.

More should be made of the town's excellent north-south rail link and should be the focus of transport planning with:

- Buses and/or mini transit systems focussed on bringing people to and from the stations to their ultimate destinations;

- Opening up of the West Station as part of the BML2 development;
- Priority given to sites with easy access to either of the two existing stations for residential or, in some cases, office development in order to reduce car dependence;
- Implementation of a mini-transit system from the West station out to North Farm, lining residential areas to retail, office and leisure 'destinations'

Site development needs to be integrated with the parking and loading policy, which should be used to encourage active travel and to avoid obstructing the main roads:

- On the main road transport links, greater emphasis will be needed on no parking / loading and its enforcement. This will reduce delays on the road network and discourage drivers from using rat-runs. Sites which increase parking or loading on main roads should be discouraged. Loading on main routes should be restricted to early mornings and late evenings – between 9pm and 6am.
- Car parking charges should be sufficiently high to ensure that the public transport alternative is cheaper.
- Preference should be given to off-street car parking, where on-street car parking prevents or discourages active travel as it does on designated cycling routes.
- There should be strict enforcement of restrictions on pavement parking in the town centre. As well as being an obstacle to those walking, particularly the elderly, the disabled and those with children, this leads to expensive maintenance costs for the Borough.

As mentioned in TWBC's cycling strategy, segregated cycle routes need to be built to enable commuting by bicycle. All sites should include sufficient storage / parking for bicycles, to make it the easy choice for residents.

Consideration should be given to enlarging the current Civic Centre development plan to include the Crescent Road car park area. This would enable a better planned access into the car park.

A green infrastructure plan has already been approved. This should be further developed to ensure that anyone living within two miles of the town centre is able to walk or cycle into the town centre, including investment in adequate crossings over the main roads identified.

Finally, in considering infrastructure, the adequate provision of fresh and waste water delivery, recovery and treatment should be concurrent with any additional housing development which should arguably participate in the cost of its provision.

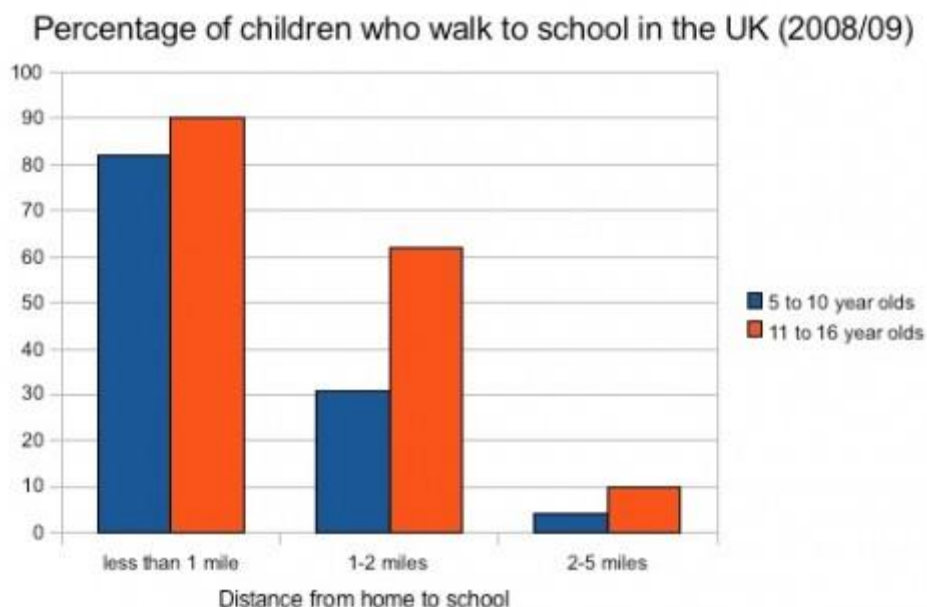
### **3. Educational provision**

There are already a number of educational "black holes" in Royal Tunbridge Wells where substantial residential areas lie outside the catchment of a primary school within reasonable walking distance and this situation should be tackled prior to any further population growth.

According to the National Foundation for Education Research, proximity is the second most important factor for parents when choosing a school. In Tunbridge Wells many children are forced to attend a school which is not within walking distance as may be seen from the map in appendix B. This illustrates the large swathes of the town which already have inadequate school provision. All areas shown as hatched are areas from which thousands of avoidable car journeys across town originate every day.



‘Statutory walking distance’ is set at 2 miles, meaning that beyond that distance the County Council must provide free transport to school, but Charity ‘Walk-It’ reports that even at 1 mile distance from school, 1 in 5 primary children do not walk to school. As distance increases beyond 1 mile, walking rates drop to one third.



Given the higher levels of car ownership in RTW relative to national levels and given the effects on families of the “black holes” in primary school provision mentioned above, the percentage of children walking to school in our town will be significantly below the national average. Every child being driven to school results in four car journeys per school day, involving a return car journey both at drop off and pick up, further deterring walking and cycling.

Expansion of existing schools serving the centre of RTW has reached capacity. Expansions in recent years have put immense pressure on the common facilities of schools such as halls and sports facilities. The problems include the fact that:

- Many schools can only expand intermittently. Bishop’s Down and Pembury Primary schools for example, can accept an additional class for three years running but have subsequently to reduce intake to one class for the following four years, before the mobile units are available to take an extra class again. This results in a perpetual contracting and expanding of catchment areas.
- During the expanded intake, children from further afield are accepted. Their siblings in subsequent years have priority over local children. This results in many local children who do not have siblings at their local school having to go elsewhere, often to surrounding village schools.
- There have also been many instances where whole classes have not only been filled exclusively by siblings, but where even siblings couldn’t be accommodated.
- Where primary school aged siblings are assigned different schools parents are forced to drive to and from schools, even if the schools are at walking distance from their home individually. A two to four mile or more round trip and coinciding start and end times at schools make this inevitable.

There are many cases where, in the Culverden, St John’s, St Peter’s and Village areas of town, parents have therefore had to purchase a car (or a second car) to drive their 4 and 5

year old children between their home and their respective more distant schools. This is an indefensible situation at a time when traffic, pollution and parking are one of the biggest challenges the town faces.

The SHMA provides for a possible increase of 1,957 (9%) in children under 15 in the Borough by 2033. This is in theory the equivalent of 3.5 two-form-entry school and two primary and two secondary schools in practice, since under 15's will be distributed between both. This would only meet the new need but not fill the existing gaps, let alone provide the 5% surplus in school places councils are required to provide for flexibility.

There are insufficient sites currently envisaged by KCC on which to locate schools accessible to those children who will be resident in RTW and Southborough by 2033 even if there should be only a modest increase in housing spread across the town, with the bulk of projected housing allocated elsewhere. TWBC used to have powers to allocate sites for educational purposes under the 2006 Local Plan Policy CS 3. Restoration of those powers would give the Borough Council more leverage with KCC in these matters. We make suggestions on the map at appendix A as to where additional provision might be made and existing provision retained.

## **C. Opportunities for Development**

### **1. Garden Villages**

We warmly welcome the Council's initiative in seeking research grant funding from the Government to evaluate the feasibility of creating one or more Garden Villages in the Borough together with the schools, surgeries and road infrastructure needed for them to develop as sustainable communities. Such villages could relieve both Royal Tunbridge Wells and some other existing settlements of unsustainable pressures for development, while meeting realistically appraised housing need. We do not have the expertise to comment on where such villages should be located, but would wish to see them on land not classified as AONB or Green Belt and preferably with close access to a main line or re-opened railway link. It may be necessary to develop them in co-operation with one or more neighbouring Local Authority under the NPPF duty to co-operate provisions.

The development of such new sustainable settlements may take a period of a decade or more. Should suitable sites be identified, we advocate that TWBC seek a binding agreement with the Secretary of State whereby the Council undertakes to deliver the housing associated with the new settlements and the Secretary of State allows a phasing of annual housing supply delivery figures to take account of the provision which will have been made by the new settlements by the end of the new Local Plan period. This may offer a way to neutralise any further "planning by appeal" in the Borough as a whole.

### **2. Additional Areas of Change in RTW**

The current Local Plan identifies a number of areas in the town where comprehensive redevelopment on the basis of Masterplans is envisaged. There may be scope to extend the Area of Change principles to at least three other areas in the new Local Plan, to be brought forward later in the new plan period. Also, within the already designated AL/RTW2 Crescent Road/Church Road Area of Change there is scope to investigate new uses to which the large area lying beyond the Civic Complex could be put. Opportunities could then be seized to mitigate the problems of the A264. We identify the three new proposed Areas of Change

as A, B and C on the map in appendix A and they each fall on our proposed high frequency public transport route identified by a blue line on the same map.

A measure of compulsory purchase may be necessary in the same way as was the case with RVP in order to secure the optimum planning gain in some of the proposed Areas of Change and in others value equalisation negotiations between landowners may be required. In neither case should this act as a deterrent to a pro-active approach.

### ***Area of Change A***

This proposed area of change comprises the present industrial premises grouped in the former High Brooms Brick Company quarry and Chapman Way, the stretch of North Farm lane passing by and including High Brooms Station and the site of the former Tunbridge Wells refuse tip (AL/GB4).

Our proposal would be to relocate the present industrial premises to the west of the railway overbridge to a purpose built new estate on the site of the former tip with access to the main road network via Longfield Road and the A21. The vacated space would then be suitable primarily for sustainable residential development with potential for some additional office development. In addition to all being within 5-10 minutes' walk of public transport from High Brooms station, this redevelopment could form one end of the high frequency public transport route canvassed in the transport section of this response, thus meeting additional policy objectives of the Local Plan.

### ***Area of Change B***

This proposed Area of Change comprises the island formed by Upper Grosvenor Road, Meadow Road, Goods Station Road and Grosvenor Road. Although very close to the heart of the town, it is not at present occupied in an optimal manner. Its redevelopment for mixed use would allow additional residential, retail and business uses. It would also allow a rationalisation of the town centre traffic system to enable some semi-pedestrianisation and the development of a small public transport interchange on Grosvenor Road. This interchange would be on the route of the high frequency service canvassed in the transport section of this response.

### ***Area of Change C***

This proposed Area of Change comprises the site of the old West Station, the Turners factory and BT yard. As with the land in AL/RTW2 Crescent Road, this offers the potential for substantial mixed use development within the town centre.

A feasibility study into proposals for a railway improvement scheme potentially re-linking West Kent to Brighton via Tunbridge Wells and Uckfield and Brighton and Tunbridge Wells to London and Canary Wharf (BML2 Scheme) is currently being undertaken with support from HM Treasury. Possible development of Garden Towns/Villages along the railway line between Ashford and Tonbridge placing further strain on the Tonbridge main line to London Bridge and Charing Cross will further reinforce the case for the BML2 proposals to be implemented.

The former West Station site therefore offers the prospect of a major transport interchange for both trains and buses and the starting point for our proposed high frequency public transport service through the town to North Farm. But given its size and location, it also

offers the opportunity for major mixed use development at a time when the existing buildings on the site are close to life expired. This would include a relocated Sainsburys, other retail, multi storey car parking and residential apartments. The topography of the site would happily accept housing on its periphery in an extremely sustainable location. A continued railway heritage centre for the Spa Valley Railway in the old engine shed would complement any such redevelopment.

### **Area of Change AL/RTW 2**

The opportunity should be taken to create a spacious and attractive, largely pedestrianised, mixed-use district within the existing Area of Change to the west of the Town Hall Complex. Within this part of the site there is potential for a substantial allocation of new housing units through a change in land use. This would provide the essential underpinning for the creation of a vibrant new district in the town centre based on interlocking squares.

The area bounded by the Police Station, Calverley Terrace and the boundary with Priplan House could become a new town piazza with mixed uses including residential and specialty shops. It could also provide a venue for the Farmers' Market and other outdoor gatherings.

The present car park is approaching the end of its structural life. It could be rebuilt, turned around on its axis so that it principally lies on Crescent Road with a lower and more attractive frontage incorporating office and/or residential accommodation onto Crescent Road. 2-3 floors at least could be placed underground. This would already provide more spaces than the existing but these underground floors could be continued on the present footprint and also out towards Calverley Road and under the present footprint of the TWBC staff car park, potentially creating a much larger parking area (with at least an additional 500-700 spaces) although having a much smaller footprint above ground. In this way, not only could additional parking be provided for business and retail use, but allocated parking places could be made available as part of the new residential developments on the island and for new occupiers of converted above-shop accommodation elsewhere in the town centre.

The construction of underground car parking might also enable better pedestrian links between the Calverley estate, Calverley Grounds and St Augustines and the town centre while also allowing goods servicing of the new district.

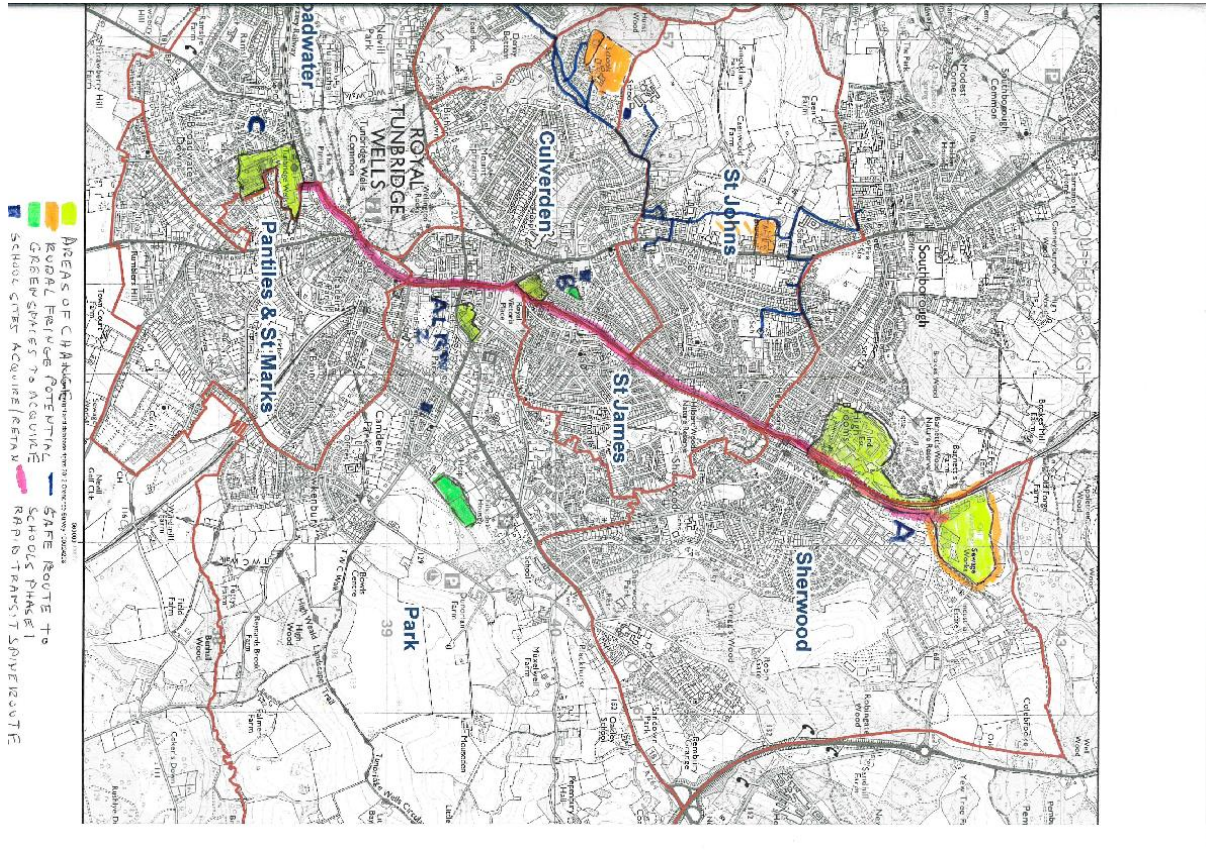
### **3. Green spaces and links**

Our green spaces and links constitute both the heart and lungs of what may be described as the "Tunbridge Wells Brand Identity". It is important to safeguard and, where possible, enhance these assets as this can produce a whole range of benefits including:

- economic development through increased tourism and leisure pursuits,
- maintenance of a distinct sense of place in an increasingly homogenised world,
- reductions in traffic congestion through localised modal shift,
- improvements in road safety,
- abatement of atmospheric pollution,
- public health benefits through reductions in stress and increased physical exercise,
- maintenance of biodiversity and cherished landscapes through proper stewardship,
- a sustainable future for our children and young people.

The above benefits were extensively discussed in the May 2015 Town Forum report "*Developing our Green Network*" and we now identify on the map in appendix A specific sites and links which could be developed to increase those benefits for residents of Royal Tunbridge Wells. These include land adjoining Dunorlan Park and Woodbury Park cemetery and the most needed new pedestrian crossings and pedestrian refuges and quiet routes to schools.

Appendix A: Map of sites and infrastructure links proposed for consideration





Appendix B: Map showing un-circled areas in need of additional educational sites

