

Appendix H: Site Allocation Summary

Appendix H: Site Allocation Summary

Assessment Criteria

- 1.1 To ensure consistency of approach, we have reviewed each of the sites against the following criteria:

Table 1.1: Assessment Criteria

Site Area (ha)
Town Centre Designation
Location
Neighbouring Uses
Transport Connections
Visibility
Existing Uses
Existing Condition
Access
Policy Allocation – Proposed Uses
Relevant Planning History
Land Ownership
Physical Constraints
Market Considerations
Delivery Considerations
Is allocation appropriate?
Could other uses be delivered?
Summary

- 1.2 In the following sections we discuss each of the allocations in turn.
- 1.3 We respond to the criteria set out in Table 1.1, concluding with our view on whether the allocations are appropriate, or whether any amendments could be made to ensure viability and deliverability.

Policy AL/RTW1

Site Number	262 & 262
Site	Mount Pleasant Car Park, surgery in The Lodge, public toilets, Mount Pleasant Road, Calverley Grounds, Great Hall car park and Hoopers' car park/service yard
Site Area (ha)	Approximately 2 hectares
Town Centre Designation	Town Centre
Location	<p>Located to the east of the town centre, this site is 1-minutes' walk from Mount Pleasant Rd.</p> <p>This site has a pleasant setting on the border of Calverley Grounds. However, it is slightly off the main road.</p>
Neighbouring Uses	Retail, Employment, Residential, Car Parking, Civic and Leisure
Transport Connections	This site is located close to Mount Pleasant Road, and minutes from Tunbridge Wells Railway Station.
Visibility	The site offers no visibility to the main road and would not have a prominent approach by car. Being located "behind" the main road means that the site is not automatically visible to pedestrians either.
Existing Uses	<ul style="list-style-type: none"> • Calverley Grounds (registered historic park and garden) • Dental surgery • Public conveniences • Hoopers' Department Store service yard/car park
Existing Condition	The Calverley Grounds park is a well-maintained park, although the dental surgery and public conveniences are dated. The Great Hall Car Park to the south of the site is also dated but looks to be in reasonable condition and meets the needs of those visiting the area.
Access	From Mount Pleasant Road and Mount Pleasant Ave.
Policy Allocation – Proposed Uses	<ul style="list-style-type: none"> • 1,200 seat theatre • 5,000 sq m office space • Underground car park • Improved park entrance (public square and speed table)
Relevant Planning History	Consent (18/00076) for Offices, Theatre, Underground Parking, Landscaping and Infrastructure. Council was Applicant.
Land Ownership	Mostly Council owned. Council CPO in May 2019. The dental surgery looks to be under a separate ownership to the rest of the site.
Physical Constraints	<p>This site features a significant slope from north to south. Part of the site has been previously developed, whilst part of the site is parkland.</p> <p>Development of the site is likely to require significant excavation which will add to development and site preparation costs.</p>
Market Considerations	<p>The theatre element of the allocation is unlikely to be delivered by the market alone and would need to be public-sector led or funded. Theatre space is not typically delivered speculatively.</p> <p>This quantum of office space is likely to suit larger occupiers. Given issues around visibility and prominence, it is unclear that this would be</p>

	<p>a desirable site for a headquarters-style building. There are also no known requirements for this level of space currently and this type of requirement is not characteristic of the local market.</p> <p>For smaller operators and multi-let space, the quantum of space is significant and it is unlikely that there is sufficient demand to fill a building of this scale or make development attractive for investors.</p> <p>Without relocation of the Council and/or public-sector involvement in delivery, it is unlikely that the market will deliver office use in this location.</p> <p>There are also likely to be challenges around viability, given the gradient of the site and the requirement to provide basement car parking. These considerations are likely to add significant cost to development.</p> <p>Were other uses considered, this site is likely to prove very attractive to the residential market given its attractive residential setting.</p>
Other Delivery Considerations	n/a
Comments on the Allocation	<p>The allocation would be appropriate, were the Council to deliver the scheme it gained consent for. However, full council has now voted not to carry this scheme forward.</p> <p>It is unlikely that the market alone would deliver an office building of this scale in this location, or the theatre use proposed under this allocation.</p> <p>An allocation for office space would allow development of this nature to come forward, if a large requirement for the town centre arises throughout the plan period. However, this sort of requirement occurs infrequently in the local market, and so it is very possible that this allocation would not be delivered.</p>
Could other uses be delivered?	We believe there would be interest in this location from residential developers. The site is well-located in terms of transport connections. It also benefits from an attractive park-side location which would be likely to drive values.
Additional Comments	n/a
Summary	<p>Our research suggests that the uses proposed are likely to require the involvement of the public sector for delivery without which, the allocation is not suitable.</p> <p>If the Council wishes to see private-sector involvement in delivery of the site, greater flexibility should perhaps be pursued, including residential use.</p>

Site ALRTW2

Site Number	250 & 251
Site	Land at Royal Victoria Place Shopping Centre, Calverley Road
Site Area (ha)	3.72 hectares
Town Centre Designation	Town Centre
Location	This site is located to the north of the town centre.
Neighbouring Uses	This site is surrounded by other commercial and town centre uses.
Transport Connections	This site is only 10-minutes' walk from the railway station, but this route is notably up hill. The site is accessible by car and features a car park.
Visibility	The site holds a prominent location in the town centre and is of a significant scale. That said, units fronting onto surrounding streets do mask the fact the shopping centre sits behind them, although this benefits the quality of experience from the exterior.
Existing Uses	<ul style="list-style-type: none"> • Royal Victoria Place Shopping Centre • Camden Centre • Market square • Adjacent buildings • Retail and other TC uses
Existing Condition	The main shopping centre has been partly refurbished recently. Other areas are dated, as are a number of the shop units which front onto the surrounding streets. Some of these units are dated and look to be in poor condition.
Access	The site is accessible by car and features a car park. It is also accessible by foot. There are numerous entrances to the shopping centre. There are approximately 60 titles associated with the shopping centre alone, with many of the outward-facing units on the boundary of the site under separate titles.
Policy Allocation – Proposed Uses	<ul style="list-style-type: none"> • A1 • A2 • A3 • A4 • D2 • 13,000 sq m of new retail floorspace
Relevant Planning History	<p>Consent given in 2017 for:</p> <p><i>Reconfiguration and extension of Royal Victoria Place Shopping Centre to provide new Class A1 (retail), A2 (financial and professional services), A3 (restaurants and cafes, A5 (hot food takeaway) and D2 (leisure) uses and associated mall areas including the demolition of Calverley House, Camden House and 1a and 1b Camden Road and construction of new buildings; construction of a roof top extension to provide new Class D2 uses; construction of a new mall and entrance onto Calverley Road; and reconfiguration within the existing centre to facilitate new A1-A3, and A5 and associated mall uses; and other associated works</i></p>

Land Ownership	The shopping centre is owned by British Land. The wider allocation contains a large number of leasehold and freehold ownerships.
Physical Constraints	<p>As development has occurred on the site in a piecemeal fashion, development could be challenging due to neighbouring businesses and services. This is because neighbouring properties may have rights over land, and there may be issues around party walls.</p> <p>The site drops several storeys from south to north. The change in heights currently accommodates the car park and lower level of the shopping centre.</p>
Market Considerations	<p>The retail market was struggling before Coronavirus, with few businesses taking space in shopping centres and many of these buildings facing increasing vacancy. This is the same for Royal Victoria Place. There are likely to be few opportunities for the development of new retail floorspace, and market sentiment suggests that managed contraction may be the best way of avoiding substantial vacancy.</p> <p>The leisure market is similar and seems to be moving from 'destination leisure' to other models where development is happening. This is perhaps reflected in the fact that British Land no longer intend on bringing forward the scheme previously planned for this site. Without an anchor leisure tenant, it is unclear that there would be demand from A3/4 operators for space within a shopping centre.</p>
Delivery Considerations	<ul style="list-style-type: none"> • Partly within a Conservation Area • Includes a listed building
Is allocation appropriate?	<p>Based on our capacity findings and market assessment, the quantum of retail floorspace does not look to be deliverable within the plan period.</p> <p>Given the current leisure market, it is also unclear that there would be demand for the type of scheme proposed previously. However, with comprehensive redevelopment, there could potentially be other opportunities in the mid to longer-term.</p> <p>Any development of this site is likely to require flexibility, allowing the developer to adapt to market conditions to ensure a deliverable scheme. The current allocation is perhaps too prescriptive and may not be deliverable in the current market.</p>
Could other uses be delivered?	Higher value uses such as residential could help to fund new development. Ensuring mixed-use development and active frontages at ground-floor level could ensure that this space serves a town-centre function, whilst ensuring the viability of proposals.
Additional Comments	Redevelopment of the site presents a significant opportunity to increase pedestrian permeability.
Summary	Development of this site is likely to prove challenging due to the scale and nature of current development, and the fact it may be difficult to identify and assemble suitable parcels of land.

	Opportunities are likely to require flexibility, as it is likely to require a mix of uses and varying densities to drive the viability of new development.
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Site AL/RTW3

Site Number	SALP AL/RTW 2B
Site	Former Cinema Site, Mount Pleasant Road
Site Area (ha)	Approximately 0.8 Hectares
Town Centre Designation	Town Centre
Location	This site is located north of the railway station at the corner of Crescent Road and Mount Pleasant Road. This site is in a strategic location at the centre of the town, at the junction of these two main roads.
Neighbouring Uses	Mount Pleasant Rd to the east of the site, and Crescent Rd to the north, feature high-street uses. Buildings to the west of the site look to be traditional residential units, although these mainly look to be occupied by commercial and service-based businesses (lawyers, dentists etc.). The southern extent of the site is adjacent to an office building, which features ground-floor retail units onto Mount Pleasant Rd. The office building looks to be in reasonable condition, but the retail units are in poor condition.
Transport Connections	The site is located on the main road and immediately to the north of Tunbridge Wells Railway Station.
Visibility	This site benefits from a strong prominent location at the centre of the town, and features at the corner of two main roads. It has strong visibility from dual aspects.
Existing Uses	Vacant site. The former cinema building has been demolished.
Existing Condition	Cleared site.
Access	Access is strong via both road and by foot. Parking could be an issue for new development, if not provided on-site.
Policy Allocation – Proposed Uses	<ul style="list-style-type: none"> • 100 residential dwellings • A1 • A3 • A4 • Cinema (D2) • Medical (D1) • Office (B1)
Relevant Planning History	<p>Consent (17/02262) for comprehensive mixed-use development.</p> <p><i>Application for minor material amendments to planning permission 17/02262/FULL for a mixed use redevelopment comprising 3,039 sq m (GIA) of retail uses (use class A1/A2), 1,895 sq m (GIA) of restaurant use (Use Class A3), 1,049 sq m (GIA) of cinema (Use Class D2), 108 residential units (Use Class C3), and 372 sq m (GIA) of office (Use Class B1), together with the provision of car and cycle parking, highways works, realignment of Public Right Of Way WBX17 and the extinguishment of Public Right Of Way WBX18. The amendments seek permission for a mixed-use redevelopment comprising 2,604 sq m (GIA) of retail uses (Use Class A1/A3), 1,067 sq m (GIA) of cinema (Use Class D2), and 108 residential units (Use Class C3), together with the</i></p>

	<i>provision of car and cycle parking, highways works, realignment of Public Right Of Way WBX17 and the extinguishment of Public Right Of Way WBX18.</i>
Land Ownership	<p>This site comprises two freehold ownerships. One covers the main site and the other the access road.</p> <p>The parade of shops south of the site are in multiple freehold and leasehold ownerships.</p>
Physical Constraints	<p>This site features a significant gradient, sloping from north to south. The site is also located above a Victorian railway tunnel with the main railway line continuing to run below the site.</p> <p>Development is likely to involve additional cost due to these factors.</p>
Market Considerations	<p>The market for residential use in the town centre is becoming saturated at present due to the volume of new development, but this use is likely to be deliverable in the mid to longer-term. Given the challenging nature of the site, the quantum of units and impact on viability should be explored in further detail. In particular, we would question why the consent gained for the site has not been delivered.</p> <p>We expect that retail space in this location could be delivered at ground-floor level, but suggest that the quantum proposed in the consented scheme may be too large given market conditions. We note that the retail capacity work indicates that there is no new need for comparison retail floorspace in particular.</p> <p>The inclusion of cinema use at this location is reasonable, and we expect that the demographics and competition in the local area would make this an attractive location for a smaller 'Arthouse-style' cinema operator. If this is delivered, then the site would prove attractive for food and beverage operators.</p> <p>In terms of medical use, we expect that delivery will depend on a known requirement. It is unlikely that this space would be delivered speculatively.</p> <p>Ground-floor office space could be provided as part of a mixed use scheme, and it is likely to let in this location. However, it is less clear that there would be demand for a large, standalone office building.</p>
Delivery Considerations	<ul style="list-style-type: none"> • In the Conservation Area • Adjacent to listed buildings
Is allocation appropriate?	<p>We believe that this remains a reasonable allocation. However, given concerns around viability, the number of residential units should be considered in greater detail. This may help to drive viability and ensure that development is delivered on this challenging site.</p> <p>It may also make sense to include the parade of shops which front onto Mount Pleasant beyond the allocation boundary to the south of</p>

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	the site. These look to be in poor condition and the opportunity for comprehensive development of this site is likely to make the overall scheme more attractive to occupiers and buyers.
Could other uses be delivered?	The range of uses proposed is reasonable for this site.
Summary	This allocation is reasonable, but viability is likely to be challenging. There is a risk that limiting the number of units to the number proposed in the current allocation will mean that the scheme is unviable. It is likely that to achieve a viable scheme, a developer will need to adjust the mix of uses. Increasing the number of units may allow for the flexibility which would allow for delivery.

Site AL/RTW4

Site Number	SALP AL/RTW3 and 200 & 268
Site	Torrington and Vale Avenue
Site Area (ha)	Approximately 1.14 Hectares
Town Centre Designation	Town Centre
Location	This site is centrally located and lies immediately to the west of Tunbridge Wells Railway Station.
Neighbouring Uses	North of the site is car parking for a number of commercial buildings. To the west are a number of office buildings. South of the site are a number of buildings featuring retail and other commercial units. Immediately to the east of the site is the railway station.
Transport Connections	The site is well connected by rail and is close to the B2023 and the A26.
Visibility	This site is reasonably prominent, although it could be described as slightly 'off-pitch'. Visibility and prominence of new development would depend on the height and scale, as this could make the site visible from the main road.
Existing Uses	<ul style="list-style-type: none"> • Railway station • Car parking • Multi-storey car park • Office • Commercial • Retail
Existing Condition	The design of the retail unit and car parking above is dated, although the structure looks to be in reasonable condition.
Access	From Vale Road and Vale Avenue.
Policy Allocation – Proposed Uses	<ul style="list-style-type: none"> • Ground-floor A1, A2, A3 or A4 • Hotel • Office • 100 residential dwellings • Public car parking
Relevant Planning History	There have been a number of standalone permissions for individual units within this wider site.
Land Ownership	This site comprises the following number of ownerships: <ul style="list-style-type: none"> • Freehold ownerships - 5 • Leasehold ownerships - 5
Physical Constraints	There is a significant fall in the gradient from the north-west to south-east of the site. Given neighbouring uses such as the railway line and the proximity of neighbouring buildings, development of the site could prove challenging.
Market Considerations	The convenience store and car parking are likely to hold significant value, so land assembly costs may be significant for this site.

	<p>The uses proposed appear reasonable, although there is no immediately-known requirement for a large hotel or office building. We are aware that there has previously been interest from a hotel operator, so the allocation allows for delivery of this use if such interest is secured in the future. We would nonetheless question the deliverability of the wider allocation, especially given the recent permission (and implementation) of the Premier Inn hotel on the site.</p> <p>Ground-floor commercial space in this location is likely to let, but its delivery is likely to depend on the viability of the main use of the site. The value associated with this main use could be used to cross-fund this commercial space if its value is sufficient.</p>
Delivery Considerations	<ul style="list-style-type: none"> • In the Conservation Area • Includes listed buildings • Is adjacent to listed buildings • Contains main railway station
Is allocation appropriate?	<p>Based on previous interest, the allocation is reasonable for this site when considered over the longer term.</p> <p>This allocation allows such a requirement to be accommodated in the centre should it arise.</p>
Could other uses be delivered?	<p>The site may be of interest to residential developers due to the strong transport connections.</p>
Summary	<p>This allocation is reasonable, but the deliverability is uncertain in the short to medium term without a clear development proposal.</p>

Site AL/RTW6

Site Number	Part of SALP AL/RTW 2A and Site Number 264 (Part)
Site	The Civic Complex: the Town Hall, Assembly Hall Theatre and Police Station
Site Area (ha)	Approximately 0.79 Hectares
Town Centre Designation	Town Centre
Location	This site is located north of the railway station at the corner of Crescent Road and Mount Pleasant Road. This site is in a strategic location at the centre of the town, at the junction of these two main roads.
Neighbouring Uses	This site features main roads to the south and west. To the north of the site are a range of civic buildings which are currently undergoing redevelopment. East of the site is a multi-storey car park and an office building.
Transport Connections	This site is well-located on the road network and is north of the railway station.
Visibility	The site sits in a prominent corner location at the centre of the town.
Existing Uses	<ul style="list-style-type: none"> • Civic Complex • Town Hall • Assembly Hall Theatre • Police Station
Existing Condition	The exterior condition of the building is reasonable. We understand that the interior of the building requires modernisation to meet the operational requirements of the Council.
Access	The site features strong pedestrian access and features road access from Crescent Road.
Policy Allocation – Proposed Uses	Mixed-Use Development
Relevant Planning History	n/a
Land Ownership	There are two freehold titles associated with this site. One relates to the Town Hall. The other relates to the Police Station.
Physical Constraints	Given the intention to retain much of the existing building, the main physical constraint will be working with the existing fabric of the building and being able to modify it to meet the needs of the proposed uses. For example, the location of existing windows may not suit other forms of use.
Market Considerations	<p>Delivery will require the relocation of existing uses.</p> <p>There is likely to be demand to deliver residential use in this location. However, it should be acknowledged that the retention of heritage buildings is costly and often has an impact on viability. There may be a trade-off between delivering policy requirements such as affordable housing and ensuring that the heritage building is given a new purpose.</p>

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	Delivery of this site could be linked to RTW1, and the potential to relocate certain services to new development here. Further, relocation of existing services could be considered for other Town Centre sites.
Delivery Considerations	<ul style="list-style-type: none"> • In the Conservation Area • Includes listed buildings
Is allocation appropriate?	We consider this allocation to be appropriate and deliverable. However, this will wholly depend on the relocation of existing Civic uses.
Could other uses be delivered?	n/a
Summary	<p>Depending on whether new sites can be identified for the existing civic uses, we expect that this site could come forward for a mixed-use development.</p> <p>Without the supporting development of Mount Pleasant Avenue Car Park, we would question the prospect of this allocation being delivered as currently drafted.</p>

Site AL/RTW10

Site Number	SALP AL/RTW 24 and Site Number 260 (part)
Site	Land at the Auction House, Linden Park Road
Site Area (ha)	Approximately 0.05 Hectares
Town Centre Designation	Town Centre
Location	This site is located to the south of the town centre and immediately south-east of The Pantiles. The site is slightly disconnected from the main retail area.
Neighbouring Uses	North of the site is The Pantiles, which predominantly features retail, food & beverage and hotel use. North-east of the site is the Corn Exchange, a building converted for office use. To the east, south and west of the site are residential buildings of a range of typologies. Notably, the new Dandara residential scheme is currently being built on the opposite side of Linden Park Road.
Transport Connections	This site is 10 minutes' walk from Tunbridge Wells Railway Station, and Linden Park Road provides access onto the A26.
Visibility	Although this site is close to The Pantiles, it is tucked behind the main pedestrian area at an end. There is little visibility to visitors. The site is relatively close to the A26, but again, there is little visibility to road users from this main road.
Existing Uses	Former auction house
Existing Condition	The existing building looks dated but looks to be in reasonable structural condition.
Access	Road and pedestrian access is from Linden Park Road. Sussex Mews is located to the north-west boundary of the site and provides access to an undercroft car park below the existing building.
Policy Allocation – Proposed Uses	B1 Use
Relevant Planning History	Consent (18/01928/FULL) for change of use of ground and first floor to business centre.
Land Ownership	There is one freehold title associated with this site and three leasehold titles.
Physical Constraints	There is a drop in levels from the south to the north of the building. This level change currently allows for undercroft car parking below the existing building.
Market Considerations	<p>Given current market conditions, standalone office development is unlikely to be delivered in the short term. Speculative development is unlikely to occur and so delivery of this site is likely to require an occupier requirement willing to take a pre-let. There are currently no known requirements.</p> <p>Even on a longer-term basis, it is unclear that this site will come forward for office use. Existing stock is likely to become available in other locations within the town centre, and this site offers little visibility from the main road.</p>

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	<p>We understand that the site has actively been marketed for office use and that there is currently consent for business use. However, this scheme has not progressed.</p> <p>The Dandara scheme and neighbouring Regenerate Land schemes indicate that the market is willing to deliver residential use in this location. Whilst the market may become saturated in the shorter term, this use is likely to present a longer-term opportunity.</p>
Delivery Considerations	This site is adjacent to numerous listed buildings.
Is allocation appropriate?	It is unclear if this site will be delivered for office use within the plan period. Inclusion of other uses such as residential would likely provide a greater opportunity of ensuring delivery of development throughout this period.
Could other uses be delivered?	As indicated above, this site is likely to be suited for alternative town centre uses, supported by residential development.
Summary	We suggest that this allocation should accommodate greater flexibility. This site is not ideal for office use and there is no clear demand for this use, based on current market sentiment. Inclusion of residential use could allow for redevelopment of this site.

Site AL/RTW11

Site Number	SALP AL/RTW 6, Site Number 176 (and additional land)
Site	Plant and Tool Hire, Eridge Road
Site Area (ha)	Approximately 0.48 Hectares
Centre/Edge of Centre etc.	Town Centre Recommended for removal from the Town Centre boundary.
Location	This site is located at the southernmost tip of the town centre. It is located immediately to the west of the site currently being developed by Dandara.
Neighbouring Uses	The site features residential use to the east and west. To the north of the site is an Esso Petrol Station and beyond this Eridge Road. On the opposite side of Eridge Road is open space. South of the site is Nevill Terrace and Tunbridge Wells West Railway Station.
Transport Connections	The site is easily accessible by car from Nevil Terrace and Eridge Road. The railway station is also immediately located to the south of the site.
Visibility	The site is hidden from the main road by the petrol station, which takes up the majority of this frontage.
Existing Uses	<ul style="list-style-type: none"> • Largely cleared land • Unofficial parking
Existing Condition	The site has been cleared of buildings.
Access	From Eridge Road. Access may be compromised by the location of the petrol station – without removing or relocating the current building, access will be to the side.
Policy Allocation – Proposed Uses	<ul style="list-style-type: none"> • 37-60 Residential Units • or mix including Residential, A1 and B1
Relevant Planning History	There have been a number of planning permissions on the site in recent years and most recently an EIA Scoping Opinion (15/507869/ENVSCR) was submitted for the demolition of 15 and 16 Eridge Road and the erection of a new Aldi foodstore and associated car parking and landscaping. This was, however, submitted in 2015, and we understand that it is no longer being actively pursued.
Land Ownership	There are two freehold titles associated with this allocation. The first relates to the main site. The second forms the roadway which may provide access to the north-east of the site.
Physical Constraints	<p>There is a steep bank to the south of the site, up to the Spa Valley Railway site. Although investigations have not been made, this feature may constrain development.</p> <p>Given the petrol station use to the north, there is potential for ground contamination.</p>
Market Considerations	Given development in the area, it is likely that this site would be attractive to developers for residential use. It is well-located, close to both the rail and road network. However, the neighbouring petrol station may influence viability, both in terms of attractiveness to buyers, and in terms of construction next to it.

	<p>Given the previous interest in the site, the site may be of interest to retailers. The site holds a good location on the main road, but perhaps lacks the strong visibility some occupiers will require. Equally, given the lack of identified qualitative need and the site's removal from the Town Centre boundary, we do not consider that an expanded retail use would be suitable in this location</p> <p>We do not consider this to be a strong office location as it is relatively far from the town centre or any other office buildings. It is unlikely that this use will be delivered.</p>
Delivery Considerations	<ul style="list-style-type: none"> • In the Conservation Area • Adjacent to listed buildings • Partly in Flood Zone 3 • Tunbridge Wells Common (Local Wildlife Site) located to the north
Is allocation appropriate?	<p>Whilst it is foreseeable that this site could come forward for retail or residential and possibly a mix of both, we do not identify a need for new retail floorspace. There is possible interest for residential development on the site.</p>
Could other uses be delivered?	<p>Whilst an expanded retail offering would not be suitable, residential remains the most likely use for the site, should it be developed.</p>
Summary	<p>Based on our analysis, we do not consider an expanded retail use on the site to be suitable and we would question the prospect of this allocation being delivered.</p>

Site AL/RTW16

Site Number	Site Number 24
Site	Land at Wyevale Garden Centre, Eridge Road
Site Area (ha)	Approximately 8.67 Hectares
Town Centre Designation	Out of Centre
Location	This site is located to the west of Tunbridge Wells West Railway Station, with access from Eridge Road. This site is located beyond the town centre, approximately 350m to the south-east of the town-centre boundary.
Neighbouring Uses	South of the site is a railway line and beyond this, residential use. East of the site is open space and some woodland. There is also woodland to the north and west of the site.
Transport Connections	The site offers immediate access onto Eridge Road.
Visibility	Visibility will depend on whether new uses are delivered in addition to the existing building or whether it will be demolished and replaced. If it is retained, then it blocks visibility to the road.
Existing Uses	<ul style="list-style-type: none"> • Garden centre • Associated car parking • Woodland / scrub area • Car wash
Existing Condition	The existing building is in reasonable condition. The rest of the site either features car parking or woodland.
Access	Access is via Eridge Road.
Policy Allocation – Proposed Uses	<ul style="list-style-type: none"> • A1 (Convenience retail) • Residential
Relevant Planning History	n/a
Land Ownership	This site comprises land under three freehold titles. There is also a leasehold title on the land to the south of the site.
Physical Constraints	Access to this site could be challenging given it is located at a bend in Eridge Road.
Market Considerations	<p>It is likely that residential use could be delivered in this location during the plan period. This site is far enough from the town centre that the site may suit a mix of housing and flats rather than a higher-density town-centre scheme.</p> <p>It is likely that this site would be attractive to convenience retailers if the garden centre were to vacate the site; however, given the site's out of centre location this would not be encouraged.</p>
Delivery Considerations	Part of the site looks to be protected woodland.
Is allocation appropriate?	<p>The site is already in A1 use, although promoting additional retail floorspace would not be appropriate given its out of centre location.</p> <p>Delivery of housing in this location is achievable throughout the plan period and this site offers the potential for new houses in a location close to the centre.</p>

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Could other uses be delivered?	Should the existing facility vacate, residential it the most suitable for this location.
Summary	We would question whether this is a Town Centre allocation, given it sits outside of Royal Tunbridge Well's boundary and the lack of support for expanded out of centre retail development. It is considered the site could be suitable for some residential development over the plan period as part of a mixed use on site with the existing operator.

Site AL/RTW19

Site Number	SALP AL/RTW 20
Site	Land at 77 Mount Ephraim (Sturge House, Brockbourne House)
Site Area (ha)	Approximately 2.73 Hectares
Town Centre Designation	Beyond Centre
Location	This site is located west of the town centre, approximately 0.5 miles from the Civic Complex. This is around a 10-minute walk uphill from the town centre.
Neighbouring Uses	This site is in a wooded setting. Neighbouring uses are commercial.
Transport Connections	The site is accessible via road from the A264. It is located approximately 10-minutes' walk from Tunbridge Wells Railway Station.
Visibility	Existing buildings are currently set back from the A264, but the site offers the potential for strong visibility on redevelopment. However, this site is located at a distance from the town centre.
Existing Uses	Employment / commercial uses.
Existing Condition	Although buildings look to be of 60s/70s construction, they look to be in good condition and be well let to strong occupiers. The grounds look to be well maintained.
Access	The site offers strong access from Mount Ephraim.
Policy Allocation – Proposed Uses	<ul style="list-style-type: none"> • Employment • Preferably B1(a) or A2 • B1(b), B1c,C1 and D1 will be considered favourably
Relevant Planning History	n/a
Land Ownership	This site looks to comprise three separate freehold ownerships. There are also numerous leasehold titles associated with building occupiers.
Physical Constraints	No issues were visible from our site visit.
Market Considerations	<p>It is unclear that there will be sufficient demand or incentive for developers to deliver new office space in this location.</p> <p>Existing buildings look well let to strong operators and so it is unclear what the incentive would be for new development in the short term. As buildings age further, there may be some need for replacement.</p> <p>Where new demand does arise, it is likely that there is sufficient existing stock in other locations to accommodate it.</p> <p>If the market improves to a level where speculative development becomes attractive and viable or a large requirement needs to be accommodated, then intensification or redevelopment of this site could accommodate this. However, it is not clear that these scenarios will occur over the plan period and so this may not be delivered.</p> <p>Given the attractive wooded setting, this site is likely to prove attractive to developers delivering D1 space. It is likely that this use could be delivered in this location.</p>
Delivery Considerations	<ul style="list-style-type: none"> • Located in Conservation Area

Appendix H // continued

	<ul style="list-style-type: none"> • In proximity of listed buildings • Opposite Tunbridge Wells Common (Local Wildlife Site) • Part of site in area with archaeological potential
Is allocation appropriate?	<p>The allocation looks to be appropriate, but we query whether it is necessary. Given that the site is already in employment use, redevelopment including that use would generally be acceptable without an allocation.</p>
Could other uses be delivered?	<p>To avoid excessive loss of overall office stock, existing stock of this quality should be retained where possible. We would suggest that other uses are not considered for this site to ensure that an employment function is retained.</p>
Summary	<p>This allocation looks to ensure long-term employment use of the site. However, it is unclear that a policy allocation is the most effective mechanism for doing so given that redevelopment of the site for office use would already be acceptable in policy terms.</p>

Site AL/PW2

Site Number	Town Centre
Site	Paddock Wood Town Centre
Site Area (ha)	Approximately 6.76 Hectares
Town Centre Designation	Town Centre
Location	This site comprises Paddock Wood Town Centre. The area is immediately south of Paddock Wood Railway Station.
Neighbouring Uses	Beyond the town centre, uses are predominantly residential. The northern boundary of the site comprises the railway line.
Transport Connections	The area is well served by Paddock Wood Railway Station. The B2160 serves as the main road connection in and out of the town. This joins the A228 to the north and A21 to the south.
Visibility	n/a – allocation covers entire centre.
Existing Uses	General town centre uses. There are a number of comparison retail and café units. There are also a number of smaller high-street office units. To the north of the area near the railway station is a Waitrose Food Store.
Existing Condition	Units within the centre range in condition. Some are of reasonable quality whilst others are slightly dated. There has been no recent new development.
Access	Access to and from the town centre is reasonable. The railway station provides access to London in approximately 1 hour. The town is also accessible via the B2160.
Policy Allocation – Proposed Uses	<ul style="list-style-type: none"> • 400 - 700 sq m A1 (Comparison Retail) • A2 • A3 • A4 • A5 • B1 • D2
Relevant Planning History	n/a
Land Ownership	This allocation features a large number of freehold and leasehold titles.
Physical Constraints	Presence of the railway line the north of the area may restrict development close to it.
Market Considerations	Based on current market conditions, it is unlikely that there would be substantial new development opportunities in the town centre in the short term without any other changes or intervention. However, as part of the emerging Local Plan, significant growth is proposed as an extension to Paddock Wood as well as enhancements to the existing town. This is likely to generate a need for supporting amenities in the town centre as previously summarised. In light of the increasing density of population in the area, opportunities to deliver new town-centre uses in Paddock Wood are likely to come forward over the plan period through a masterplanned approach.

	Flexibility should be included in the range of uses supported, to ensure that opportunities can be delivered where they arise.
Delivery Considerations	Delivery of new space will rely on delivery of new housing in the area.
Is allocation appropriate?	In general, the proposed range of uses is reasonable for a designated town centre; however, we would question the necessity of such an allocation given the policy support for such development within the town centre boundary.
Could other uses be delivered?	The range of uses included is reasonable for the town centre in general. Given the location close to the Railway Station, there may be demand for residential, which could be delivered in flats above new retail or food and beverage units. This use could further encourage use of the centre beyond working hours.
Summary	<p>This mix of uses is generally reasonable, with there likely to be demand for the proposed uses due to the large number of new homes which will be delivered in the area. Though it is not necessary for this to form a specific allocation.</p> <p>Additionally, residential use could have a supporting role in the town centre providing it does not further break up the active frontages.</p> <p>Constraints for development in Paddock Wood would include land assembly. Bringing together large enough sites for redevelopment may prove challenging given the piecemeal nature of ownerships.</p> <p>There may be softer interventions available to encourage delivery and private-sector involvement. A focus on public realm improvements, for example, could be used to create a more attractive environment for investment. Although investment in the town is likely due to the number of new homes proposed in the immediate area, such interventions could act as a catalyst.</p>