

Royal Tunbridge Wells Town Forum response to the Inspector's questions in relation to Stage 1 issues 2 and 3

Introduction

Formed in 2005, the Royal Tunbridge Wells Town Forum is the voice of some 50,000 residents in the unparished town of Royal Tunbridge Wells. Supported administratively by TWBC in lieu of a formal Town Council, it comprises some 50 local residents' associations and community interest groups and its meetings are also attended by borough and county councillors for town wards.

Besides regularly submitting comment on strategic planning issues affecting the town, in 2016 the Town Forum submitted a 15 page response to TWBC's initial Call for Sites. This was followed with a 43 page response to the Call for Sites Consultation held between 2 May and 12 June 2017 and a 68 page response to the Regulation 18 Consultation held between 20 September and 1 November 2019. Finally, the Inspector will find Town Forum responses to over 60 draft policies under the Regulation 19 Consultation in the TWBC New Local Plan database

Issue 2 Habitat Regulations Assessment

Question 2 in relation to ensuring that SAMM and SANGS mitigation would be effectively ensured should housing development be allocated at sites AL/RTW 16 and AL/RTW 5

Given our views on densification within the existing boundaries of the town as set out in response to the Inspector's question 5 considered below and our anticipated responses to relevant Stage 2 questions, we do not believe that development at sites AL/RTW 5 and AL/RTW16 within the Green Belt are justified during the plan period.

If the Inspector should nevertheless be minded to confirm removal of some or all the proposed allocations from the Green Belt, **paragraph 138 of the NPPF** states that a Plan should set out "*ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land*". **Paragraph 141 of the NPPF** states: "*Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.*"

We would therefore expect to see much more specific proposals in both the proposed allocations as to how the provisions of paragraphs 138 and 141 would be given effect.

In the case of **Spratsbrook Farm AL/RTW 16**, an area of the allocation nearly twice the size of the developable area would remain open within the AONB with public access. We believe this should be dedicated more explicitly as a permanent **Local Green Space or Park** by way of a Sec 106 agreement, as was done with land on the Knights' Wood development, with continuation of agricultural use if compatible.

We would welcome the proposed pedestrian links and improved connection to the existing Public Rights of Way network, with formal designation of the informal footways as Public

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Rights of Way to increase and improve accessibility and informal recreation within and around this area. This should be more clearly identified on the allocation map.

We would welcome the protection of existing mature trees and hedgerows as proposed, but the developer should be required to do so wherever reasonably practicable rather than merely to "have regard" to this aspect. Similarly, the developer should be required to take full account of topography, ancient woodland and buffers, and impact on the setting of the High Weald Area of Outstanding Natural Beauty and not merely to have regard to these aspects.

At **Caenwood Farm AL/RTW 5**, only about a third of the allocation is to remain open although the projected housing numbers are similar (120 at RTW16 and 100 at RTW5). There seems a strong case for requiring other land in further mitigation.

There seems to be a potential incompatibility within the proposed policy. The SHELAA site assessment sheets and Sustainability Appraisal of AL/RTW5 land found that the site was "*well screened from surrounding roads and houses*" and this is repeated in paragraph 5.51 of the Draft. This occurs mainly through a continuous mature and very high hedgerow which runs along the south side of Speldhurst Road which is covered by a Tree Preservation Order. It is an important factor in concluding that the site might be suitable for development. However, paragraph 2 of the policy states that Speldhurst Road might be widened as part of the development. Any widening of Speldhurst Road could only take place through the destruction of the very tree screen that is said partly to justify the allocation in the first place. Its loss would end the status of the land as being "*well screened from surrounding roads and houses*". If confirmed as an allocation by the Inspector, the allocation should stipulate that the existing tree cover will be maintained.

We would advocate enhanced footpath links to be provided from the existing route to the west of the site to connect to other footpaths and the surrounding area but this has not been shown on the policy map of the wider area. It needs to be more explicitly dealt with in the policy, as should the required improved access to the wider area as public open space and ecological mitigation to be secured by any development. In particular a new PROW should be provided from opposite the entrance to Salomons, linking into the existing footpath running westward on the edge of the allocation. Another PROW should be established running northwards from the end of Smockham lane PROW, parallel with Broomhill Road giving safe access to the existing PROW at Mill Farm and thence to the Tunbridge Wells Circular Walk, and further up Broomhill Road to the Salomons estate and its leisure and hospitality facilities.

We consider that there would be a strong case at Caenwood Farm for a **SANGS Country Park** created from Sec 106 contributions to complement the adjacent Hurst Wood and St John's Park to provide diversified recreational space for residents of St John's, north west Rusthall and the south western part of Southborough, who currently have sustainable access to very little public green space.

We would welcome the protection of existing mature trees and hedgerows as proposed, but the developer should be required to do so wherever reasonably practicable rather than merely to "have regard" to this aspect.

In conclusion of our consideration of potential mitigation, there are insufficient specific details as to how the provisions of paragraphs 138 and 141 of the NPPF would be given effect

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in the case of either site. Without more substantial and concrete provisions inserted into the Plan, we fear that satisfactorily substantial mitigation for the loss of Green Belt might be negotiated away in later discussions with developers.

Issue 3 Sustainability Appraisal

Question 5, in relation to strategies that might avoid releasing land from the Green Belt surrounding Royal Tunbridge Wells

In our response to the initial Call for Sites, we identified a number of sites in the town centre which would allow sustainable development of the town in the later years of the new plan period. These sites would easily avoid any need to consider release of Green Belt or AONB land immediately adjacent to Royal Tunbridge Wells. We proposed four 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 then existing Area of Change on Crescent Road/Monson Road.

We still believe that these sites would be highly sustainable and potentially deliver upwards of 1200 potential residential units, precluding any need for loss of Green Belt or AONB surrounding the town during the plan period. To these units might now be added some significant residential development within or atop the existing semi-derelict Royal Victoria Place shopping mall and its under-used higher tier parking places. There is also a potentially significant development site on the eastern side of the Central Station railway cutting below Grove Park.

However we became aware in the course of regular and detailed discussions with planning Policy Officers at TWBC (for which we were very grateful) that the current planning system effectively precludes pro-active major development initiatives by a medium tier authority such as TWBC:

- The Local Plan process is dependent on landowners proposing sites for development. The role of the planning authority is then reduced merely to endorsing or opposing such proposals. This does not equate in our view with an optimal consideration of where development should occur but, we were forced to accept that it is the reality of the present planning system;
- The planning system also requires strong evidence of deliverability within a certain time horizon. Where land holdings are fragmented and a medium tier authority neither has the staff resources to engage in complex negotiations for the assembly of land for comprehensive redevelopment nor the financial resources or political appetite for compulsory purchase, developments such as those we suggested are unfortunately unlikely to meet the criteria required to satisfy the government's planning inspectorate;
- Consequently, despite apparent exhortations to the contrary in the NPPF, the present planning system favours unsustainable Greenfield development on the edge of towns which will place unnecessary infrastructure burdens and will have long term deleterious effects on the health and social fabric of those settlements.

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In spite of what we perceive to be fundamental flaws in the planning system, we consider it useful for the long term development of the Local Plan, through its future 5 year reviews, to lay down markers below as to what might be achievable in our town in the event of a planning system reformed to be worthy of the name and sufficient manpower resources within TWBC to take advantage of such a system to benefit existing and future residents of, and visitors to, the town. We would point out that in the very different climate of the 1980s, the current Royal Victoria Place *was* in fact masterplanned as a joint venture by TWBC and a developer and required substantial preliminary land assembly and some use of compulsory purchase powers.

In responding to the Calls for Sites, we commented that the 2006-16 current Local Plan identified a number of areas in the town where comprehensive redevelopment on the basis of Masterplans was then actually envisaged. We suggested adding the following Areas of Change as A, B and C on the map in appendix A reproduced below, each connected to our proposed high frequency public transport route identified by a blue line on the same map.

Area of Change A

This proposed area of change comprised the present light 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.

Our proposal was 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 of a type meeting identified housing need for affordable and social housing with potential for some additional office development. In addition to being within 5 minutes' walk of High Brooms station, this redevelopment would also sit on the high frequency public transport route canvassed in the transport section of our response, thus meeting additional policy objectives of the Local Plan.

Area of Change B

This proposed Area of Change comprised 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 our response.

Area of Change C

This proposed Area of Change comprised the site of the old West Station including the Sainsbury and Homebase, the Turners factory, Plant and Tool site, Monacute Gardens and the former BT engineering yard.

The former West Station site offered the prospect of a major transport interchange for both trains and buses and the starting point for our proposed high frequency public transport service

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through the town to North Farm, which is to be further developed under the Regulation 19 Draft and the major housing development at Knights Park.

But given its size and location, it also offered 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 units, multi storey car parking and a major development of residential apartments. The topography of the site would happily accept multi storey 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, which would be centred around restoration of public railway passenger services at a 3 platform 12 car main line station with trains to Brighton, Lewes, Newhaven and Seaford to the south via Eridge, Croydon and beyond via Groombridge to the north and Tunbridge Wells Central, High Brooms, Tonbridge and stations to London Charing Cross to the north and Ashford and Dover to the East. A preliminary Masterplan was developed within the Town Forum Strategic Planning Working Group.

This remarkable opportunity for substantial residential development and major sustainable additions to our transport infrastructure appears likely to be thrown away because of the exigencies of the current planning system which will only bring forward an unsatisfactory piecemeal redevelopment of part of Royal Tunbridge Wells's potentially key development site.

Appendix A: Sites proposed by Town Forum for consideration under the Calls for Sites

