

Vision for Royal Tunbridge Wells 2017-2033

Enabling sustainable growth in an historic town

Introduction

This paper sets out the Town Forum's input to the new Local Plan and includes reference to matters outside the unparished area that impact the town itself. Over the past 10 years the Town Forum has submitted papers to various consultations, strategies and topics relevant to the unparished area of Tunbridge Wells¹. This paper summarises that output and draws conclusions on key issues – planning, transport, cultural development, leisure and tourism.

The Town understands the key issues facing the Borough Council as

- Securing sufficient income to make up for the withdrawal of Government grant;
- Meeting the hugely increased housing need expressed in the Strategic Housing Market Assessment 2015 (SHMA), while controlling development effectively; and
- Matching employment and infrastructure to housing growth and improve sustainability.

This paper makes no direct comment on how to secure income, beyond noting the need to ensure that short-term financial pressures do not distort long-term priorities. We express our concerns about how the overall level of housing need risks unplanned and incremental growth leading to a loss of the town's identity, a worsening balance with employment and infrastructure and increased congestion and pollution.

In recognising the urgency of assessing the Borough's housing capacity we suggest some ways of meeting demand without sacrificing vital assets. In doing so, it is vital that current vague aspirations are developed into specific, evidence-based policies within the Local Plan, which can be defended at appeal, if necessary. It may also be wise for the Borough Council to use its resources to acquire land.

Following an executive summary, the document is structured into 4 sections – character of the town, some issues, a possible response and opportunities identified – plus two appendices on tourism and population.

Town Forum Management Group, February 2017

¹ including consultations such as TWBC Call for Sites, Landscape Character Assessment, Urban Design Framework, Transport, Cycling and Parking Strategies; KCC's Active Travel Strategy, the Town Forum's Green Network (GN) report, TWBC's Five-Year Plan and Corporate Priorities.

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Executive summary

Towards change

While it may be hard to agree a single vision of how the Borough will look in 30 (or even 10) years' time, doing nothing to shape the future is not an option. The high pressure on new housing and the limited growth potential of Royal Tunbridge Wells requires an urgent and positive response to meet current and future needs. The alternative of unplanned and incremental growth is worse and risks destroying the character of the town and the surrounding rural areas that are so attractive for residents, visitors and businesses.

The spa town of Royal Tunbridge Wells is the main centre of population (50,000) in a largely rural borough of 116,000 people. The unique historic and commercial centre of the town and the surrounding green belt areas make it the subject of most pressure for development and population expansion. There is no popular ambition to enlarge the town to a small city or to embrace a different or suburban character. Even if such a view existed, its hilly site, remote cross border Kent/East Sussex location and surrounding Area of Outstanding Natural Beauty makes it hard to achieve.

A future vision for RTW should prioritise preserving and enhancing the commercial, as well as social value of these assets in attracting:

- businesses, especially in the town's specialist fields of education, health, law and insurance, and more recently publishing/new media, entrepreneurs, tourism; and
- highly skilled residents to work locally or to commute to London

A wealth of historic assets

Early Tunbridge Wells was little more than a village set among common land based on a passing fashion of health-giving waters. Although the fashion soon passed, the town is proud of its spa heritage which continues to be an integral part of its identity. The architecture and plan of the inner areas date largely from Regency and early Victorian times, when it developed rapidly into a residential and commercial centre. It is this ambience which today attracts people to live and work here and dictates the terms of the development.

What makes RTW different and appealing is

- abundant greenery in private gardens, parks public open space and its unique Commons;
- a large conservation area covering much of its inner area;
- an urban environment of historic and architectural value;
- a largely residential core within walking distance of a small historic and retail centre; and
- green links from the town centre to a rich network of footpaths and bridleways in the surrounding Green Belt and AONB;
- A diverse and vigorous cultural life.

Stopping the rot

It is unlikely that TWBC can challenge the Objectively Assessed Needs (OAN) for extra housing for the Borough as a whole, since the OAN is founded on nationally based statistics and assumptions. Meeting the OAN poses two specific risks for Royal Tunbridge Wells:

1. Unplanned development would destroy the character of RTW – the main asset that makes it so attractive to residents, visitors and businesses – by further worsening the chronic congestion that exists during a large and increasing part of the day.
2. Employment growth in the town may fail to support the projected population, as already recognised in the SHMA. Sustaining the town needs significant investment in infrastructure (a) to enable people to work close to where they live and / or (b) to transport them to their place of work efficiently.

The erosion of RTW's unique assets from earlier expansion has made the town a less attractive place to live and work:

- Stagnating employment while the population has grown;
- Limited affordable housing near to places of employment; and
- Inadequate infrastructure – roads, services, schools & health – to support growth.

This erosion must be halted before it destroys a popular and unique community at a time when it is refreshing its cultural offering, re-purposing its civic centre and rebalancing the needs of pedestrians and cyclists against the chronic traffic congestion that impedes the town's ability to function.

Incremental unplanned housing growth would:

- worsen the balance of population versus employment and infrastructure;
- diminish the town's unique identity;
- increase congestion and pollution;
- sacrifice vital assets for housing numbers;
- use topographically unsuitable sites; and
- separate the urban centre from the rural fringe.

Growth with purpose

RTW needs to be maintained as a sustainable and growing community by:

- Linking existing communities through an integrated transport system that provides safe, efficient and affordable ways of accessing RTW's retail and commercial centres without adding to congestion;
- Ensuring that existing and new communities retain their individual identities and are self-sufficient with local employment, affordable housing, vibrant retail centres, sport and leisure and education facilities; and
- Discouraging housing developments that do not meet the above criteria.

Six priorities

1. Shape the future rather than leave to market forces, retaining key assets for the future and generating income to support community's health and welfare.
2. Identify robustly argued constraints on development and focus on affordable housing.
3. Create at least one sustainable Garden Village in the Borough as a new community with schools, health services, employment and transport infrastructure, including new or existing railway stations.
4. Develop a network of high quality, integrated, sustainable transport solutions and infrastructure focussing on walking, cycling and public transport for shorter journeys.
5. Within RTW, increase the quantity and quality of local employment, building on existing core sectors while developing new sectors such as media, health, tourism, arts and culture, and designate new zones dedicated to employment use.
6. Maintain the high visual, amenity and cultural value of the landscapes within and on the perimeter of the town that contribute to its economic health.

1) Character

a. Context

Royal Tunbridge Wells is a medium-sized town (population 50,000) in a borough with a total of 116,000. Its character derives from a hilly site, historically quite remote, surrounded by the High Weald Area of Outstanding Natural Beauty. It has a road structure and traffic patterns which do not favour substantial incremental development. Its built environment reflects its spa heritage and a large conservation area covers much of the inner area. It has abundant greenery and green links in parks and private gardens, and a substantial area protected from development as the Commons. Relatively few buildings are statutorily protected but much of the urban environment is of historic or architectural value at a level just below this.

Major development is thus not only physically difficult but may threaten the historic environment and the natural setting. There is limited scope for meeting the projected housing need for the Borough within RTW, or the nearby town of Southborough. The area bore the brunt of housing and other growth in the current Plan but will not be able to do so in the new Plan period.

The natural and built assets of the Borough have made it an attractive location for those working elsewhere and since the early 1990s the population has grown by 25%, largely through immigration and house prices are among the highest in Kent. These assets have commercial as well as social value, attracting not merely residents but also businesses, especially in the town's specialist fields of education, health and insurance. Any plan for the Borough needs to prioritise preserving and enhancing these features and to attract higher-earning residents, many of whom will travel daily to work elsewhere.

Total employment in the Borough has barely increased in this period and the imbalance with the resident population has grown. At the same time the service sector in the town employs quite large numbers on low incomes who cannot afford to live there. With national policies unlikely to change in the immediate future, the risk is of unplanned incremental growth adding to existing problems. We therefore set out principles for growing a medium-sized town sustainably, while addressing its current problems rather than adding to them.

b. Natural Setting

Green spaces help to create a sense of place. RTW is set within the surrounding Area of Outstanding Natural Beauty (AONB) which laps at its edge. The privilege of inheriting such a location makes it important to preserve the landscape setting by proper stewardship of the areas of high quality Green Belt countryside at the edge of the town which feather imperceptibly into the AONB – some formerly categorised as Special Landscape Areas. This will allow maintenance of the high visual, amenity and cultural value of landscapes in the town and on its perimeter that contributes to the town's economic health. A strong sense of place shared by a whole population through such stewardship brings benefits of social cohesion and crime reduction as testified by the recent TWBC surveys into local perceptions of security and wellbeing.

Access to the surrounding green countryside and the parks and Common within the town is facilitated by a network of paths. This encourages pedestrian use for leisure and utility purposes, and the Town Forum has proposed extending and linking these, as a contribution

to health and the quality of life, and reducing traffic congestion. Green countryside with access from the urban area has greater value than open land elsewhere (see the Marmot Report on the health benefits of green space).

c. Built Fabric

Royal Tunbridge Wells may be unique for a town of its size in the extent of its conservation area, which covers large parts of the town centre as well as the Common and adjoining residential areas. The Conservation Areas Appraisal of 2000 describes this area as characterised by steep hills, greenery and outcrops of rock, with substantial variations of character between adjacent areas. However there are relatively few statutorily listed buildings, just over 300 with the recent listing of houses in Newcomen Road.

But the provisional Local List produced in 2007, which covers the Conservation Area only, contains nearly 2,000 separate entries. This expresses the historical fact that much of the built fabric dates from the period of rapid growth between 1830 and 1910. It mainly developed then not with grand showpieces or public buildings, but with housing for the expanding middle class, and those who served and supplied them, and with parks and gardens.

Thus the historic character of the town is not spectacular, and, with certain exceptions, not formally composed, but domestic and, varied, reflecting how it was built by many different hands. What is valuable is not just the listed features but the more modest fabric of housing, seats, walls and paving, the use of traditional materials, and the spaces and vegetation that contain them. While lacking co-ordination it shows certain characteristic features, some of them sustained long after they were widely fashionable.

There have been sad losses of these over time but recently some private owners have succeeded in restoring eroded features. The Council too has ambitious plans to upgrade the public realm in the central area. It is now recognised that the essential character of the town is an asset to be conserved and a key to its branding for visitors. Key decisions are now due to be taken, on the future of the listed civic complex, on the redevelopment of other major sites, and the treatment of public parks and Common. It is vital to conserve and improve the whole urban fabric while meeting the other objectives of the Plan.

d. Arts, Culture, Leisure and Tourism

It is said that Tunbridge Wells, once a pioneering tourist destination and leisure resort, lacks a distinctive brand image partly because other priorities have meant that tourism has been under resourced by the Borough Council in recent years.

The town's built environment and green assets are underused in creating an economic advantage from the arts, culture, leisure and tourism. The quality and legibility of the urban environment, the maintenance of public spaces, and the ease of public access can help to foster social well-being and maintain a distinct urban identity. As well as benefitting residents, improved facilities and events can also be a major draw for visitors.

The Council's plan to replace the existing Assembly Halls and Museum provides an opportunity to reinvent Tunbridge Wells and to rebuild leisure and tourism through arts and culture. This includes supporting the cultural offer and enhancing the physical environment of buildings, greenery and public spaces. Building on its spa-town heritage, a major part can

be played by a distinctive programme of support for public art, such as water features, sculpture and two-dimensional graphics.

2) Issues

a. Housing

The Strategic Housing Market Assessment 2015 (SHMA) puts Objectively Assessed Need (OAN) at some 648 housing units per annum in the Borough, more than double the existing Local Plan target. If this level were met throughout the new plan period on the same basis as under the present Plan it would result in an increase in housing stock in RTW and Southborough of some 9,720 units and a population increase of up to 21,400 (about 20%). Since 2001 84% (10,300) of the total Borough population increase of 12,200 has taken place in Royal Tunbridge Wells and, to a lesser extent, Southborough.

A similar increase in the new Plan would fundamentally change the character of the town. It would require building in much of the local Green Belt as well as denser development in the inner areas, which would threaten the heritage fabric of the town. The key issue is how far this is an acceptable or affordable cost in terms of sustainability, particularly schools, utilities and transport infrastructure as it would be to add to the existing acute traffic, congestion, atmospheric pollution and parking problems in the town. It will be for the Plan to ensure that the OAN is distributed throughout the Borough in a way which meets these constraints.

Employment has barely increased in the town over the last 25 years and the SHMA forecasts of 16.8% growth in the next 20 years may not be reliable. This is the more likely as conversion of offices to residential units continues, a number of industrial sites have already ceased in that use, and others are allocated for non-employment use under the existing Local Plan. Without substantial new allocations of employment land, it seems unlikely that the town will see significant employment growth to balance population increase.

This is a key issue for the Local Plan. Further major incremental development in a town will simply add to the negative effects of growth since 2001. Similar problems of unsustainable development afflict other settlements in the Borough. Feasibility studies are needed to ensure that new settlements, preferably situated in close proximity to existing or re-opened railway lines, can deliver an increase in housing related to local needs, including and to employment and infrastructure. While such new developments outside the town should enable the Borough as a whole to develop sustainably, it might still be challenging or impossible to meet the unmoderated SHMA `targets` without unacceptable cost.

We identify some sites in the inner areas of the town and in the Rural Fringe which might assist in generating housing numbers sustainably later in the new plan period if infrastructure constraints can be overcome. We propose four further Areas of Change where, with substantial investment, development subject to a Masterplan could be promoted, 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.

While the clear need is for Affordable Housing (not least for key public sector employees) the SHMA expects the private market to cater for most future housing need. However the cost of open-market housing makes it likely that there will be an overall deficit in meeting the affordable housing need. Sharp increases in house prices in London may make Tunbridge Wells still more attractive to buyers from outside the Borough, many of whom would continue to travel daily to jobs elsewhere. Seeking to achieve a better balance

between identified need and overall supply should underpin the Borough Council's policy, within the constraints imposed at a national level.

Currently, land values in the Borough push house prices well beyond the purchase ability of many residents. The SHMA finds gross affordable housing need is more than 50% of housing need in the Borough. The present definition of 'affordable' housing means that the element required at present (35% on developments of more than 10 dwellings) is out of reach for many. In practice on many developments where high land prices have been paid, a lower figure for affordable housing is negotiated on grounds of what the developer can afford. There are elements of a vicious circle here, and we see ensuring an adequate supply of housing at genuinely affordable prices as a key issue, and strict application of planning policies as a way to reduce land prices.

Another effect of high land prices is an increasing trend for conversion and sub-division of existing housing, some of which is in fact permitted under the latest change to planning regulations. The result in some cases may be poor living standards, high density and noise disturbance, problems of parking and access, and lack of facilities for waste storage. While the pressure for living space is such that there may be willing customers for this property, it is an issue for the Plan how far minimum standards can and should be enforced, at least in those cases where consent is required. At the other end of the spectrum housing units are being lost by the conversion of very large sub-divided Victorian and Edwardian mansions back into single occupation by wealthy families, some coming in from outside the Borough.

b. Heritage

The key requirement of the Plan in relation to the built and natural heritage is to assess how much housing and economic growth is compatible with preserving the town's environment and setting and its historic fabric, including the context of listed buildings. This requires the following factors to be recognised:

1. ensuring the historic context is preserved and enhanced whenever possible. The Council's Conservation Areas Assessment is still a valid expression of character and the needs of these areas. It is a legal requirement to pay special attention to preserving or enhancing the character or appearance of Conservation Areas in the exercise of planning functions.
2. allowing for the conversion of existing buildings to new uses, while preserving historic features; in the case of the civic buildings allowing partial redevelopment if necessary, for an appropriate use which does not compromise the protected elements.
3. ensuring that infill and replacement in the Conservation Area relate positively to the old, respecting the architectural style and particular circumstances of the Conservation Area without dogma or preconceived prejudice, ensuring an appropriate level of architectural skill and historic knowledge.
4. protecting the brick pavements, whether listed or not, and ensuring development does not result in any net loss of these ; guarding against the progressive loss of these through the unnecessary use of tarmac.
5. Upgrading the public realm and extending the shared space principle with respect to the setting of existing buildings, incorporating planting, bins, seats, water features, public art

and lighting in future schemes; ensuring the integration of street furniture, signs, barriers, cabinets etc where possible.

Given the present pressure to meet housing targets, there is a danger that the above principles, which are well covered by policies in the Local Plan may not be given sufficient weight in planning decisions. Assessing the potential for future development needs to take account of them, and allow for stricter control in order to raise environmental standards.

c. Economy and Employment

Employment in the Borough has been virtually static since 1993. At the same time the East of England Forecasting Model in its mandatory forecast predicts *“higher growth (in jobs)...than has been seen historically”* and postulates up to 16.8% employment growth (10,000 jobs). The Strategic Housing Market Assessment 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 housing Need”*. Unless the 16.8% figure is confirmed, it would be justifiable for the review to reduce the housing figure, whatever the pressure for new build.

The perceptible trend over the last generation has been for growth in housing in Tunbridge Wells and the economically active population to considerably outpace employment in the Borough, and in the town. This has resulted in increases in out-commuting by rail and road, with corresponding increased traffic congestion. At the same time the rising cost of property in the town has caused many lower paid jobs in sectors such as retail and hospitality to be filled by those living outside and travelling in daily. Road congestion in the town, particularly on the main axes, is now exerting restraint on employment growth. It is a principle of sustainability that future housing growth should be at least matched with employment growth and expanding infrastructure to accommodate necessary movement.

Over some three decades population increases have not been matched with employment, and it appears that the prospect for future sustainable employment in the town may be significantly worse than considered in the SHMA:

- National policy allowing virtually unrestricted conversion of office accommodation to residential use is already having a major impact in the town centre, with examples including Union House and Calverley House.
- Manufacturing and distribution jobs and the sites on which they are based are also disappearing or set to disappear at the Dairy Crest and Arriva depots, BT engineering depot and Turners factory. Borough policy is conflicted, with policies to retain employment sites at odds with the obligation to use brownfield sites for housing. To land-owners, housing use is often more attractive than employment, especially on smaller sites.

The SHMA, on which housing projections are based forecasts 10,000 extra jobs in Tunbridge Wells by 2033. But although there may be continued growth in home-working (already high at 8,177 out of 57,630 workers in the Borough), a significant net increase in employment will only arise if a pro-active strategy is adopted by TWBC. Unless this situation is addressed, it is 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 place further strain on road and rail infrastructure in the area at peak times, without taking into account any further increase in population and the demand this will also create for infrastructure. To be sustainable, housing development generates other needs for land, for schools, services and social facilities.

There is considerable scope for the town, with its large pool of highly qualified labour, to reduce out-commuting by attracting higher added-value employers, but this would require positive intervention by the authority to ensure suitable sites are identified and protected

This does not address the imbalance reflected in the preponderance of lower-skilled workers entering the town daily from the cheaper surrounding area, which particularly affects retail, but also essential public service workers. In spite of growth at some major sites such as the RVP, it seems unlikely that there will be significant increases in retail employment during the plan period, although there may be some in leisure and hospitality. It may still be an issue for the Plan to address the current levels of need with regular reviews in case new initiatives are called for. In the central area it is important that potential employment sites are not lost to housing or sterilised by unrealistic allocations for retail or other uses.

d. Transport

Residents, businesses and visitors all cite the existing and rising level of traffic congestion, particularly following the sharp increase in population between 2005 and 2010, as a key negative aspect of RTW. The adverse consequences – for physical and mental health, air quality, the economy, parking and rat-running have already reached unsustainable levels.

Solving the transport issue is a necessary precursor to further population growth; failure to provide a solution is likely to preclude the realisation of the predicted housing need. The Borough Council’s health obligations and the recent NICE consultation on air quality² make clear the need to tackle road traffic issues.

The root cause is that transport infrastructure has not, and in the historic centre of the town cannot, keep up with the increase in population and cars. According to DfT guidance, a road such as St John’s Road, with a capacity of 750 – 900 vehicles per hour³ is exceeded for much of the working day and cannot be materially increased by smart signals or better junction design.

Excessive traffic is particularly caused by the mismatch between jobs and house prices which increases commuting – inward and outward. Poor education planning makes for unnecessary car journeys to and from schools, and the high cost of fares compared with the cost of parking, which can be free in many parts of the town, encourages car use. Finally the notable absence of a safe and convenient infrastructure for walking and cycling leaves many with no attractive alternative but to use the car for relatively short journeys.

Although the Borough is relatively wealthy and healthy, there are significant areas of deprivation. For the many residents with no access to a car during the day, public transport and active travel are imperative. The existing train service is an asset, but underused outside commuter times. Buses could be a solution, but they currently fail to serve the rural

² <https://www.nice.org.uk/guidance/GID-PHG92/documents/draft-guideline>

³ <http://www.standardsforhighways.co.uk/ha/standards/DMRB/vol5/section1/ta7999.pdf>

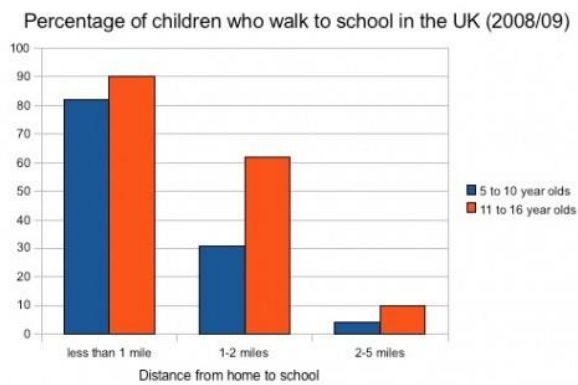
community adequately, they create pollution in town, are relatively expensive and unreliable due to congestion and often run well below capacity. Financial pressures to cut subsidies mean that existing services are gradually being reduced.

As far as transport is concerned, the challenge for the local plan is to:

1. Build housing in areas where public and sustainable transport already exists or is easily accommodated.
2. Radically reduce reliance on cars in both existing and new developments.

e. Education and Infrastructure

The National Foundation for Education Research identifies proximity as the second most important factor for parents when choosing a primary school, but many areas in RTW are not within a reasonable walking distance. Above 2 miles the County Council must provide free transport to school, but even at 1 mile distance from school, 1 in 5 primary children do not walk to school. Combined with above average levels of car ownership, this means that significant numbers of avoidable car journeys across town are made every day. The number of car journeys to and from school is a further deterrent to walking and cycling.



The SHMA provides for an increase in the Borough of 1,957 (9%) in children under 15 by 2033, equivalent, in practice, to two primary and two secondary schools. This would neither fill the existing gaps nor the 5% surplus that councils are required to provide for flexibility.

The new school sites envisaged by KCC are insufficient to place those children who will be resident in the town, even with a modest increase in housing. Expansion of existing schools serving the centre of RTW has reached capacity, putting pressure on facilities such as school halls and sports facilities.

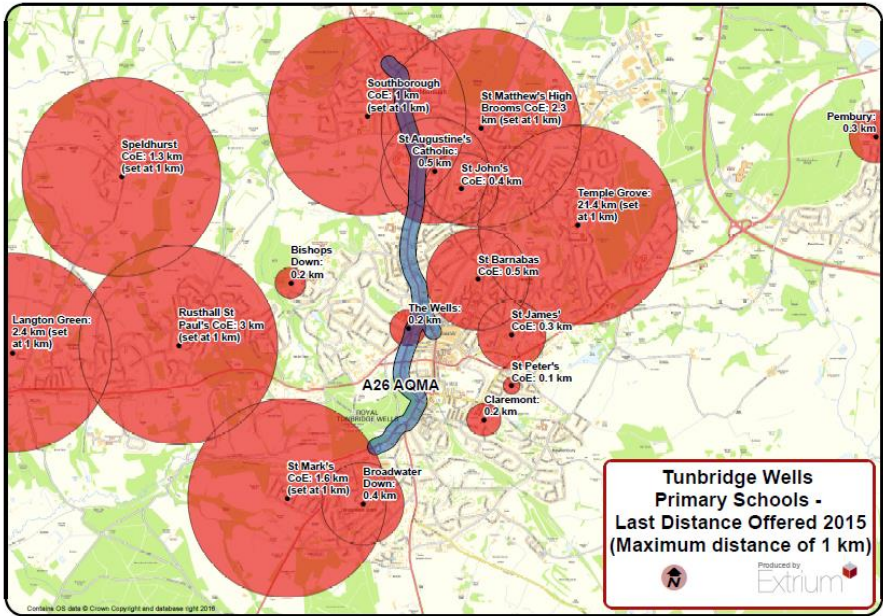
Schools such as Bishop’s Down and Pembury Primary schools expand intermittently, being able to accept an additional class for three in four out of four years. During the expanded intake, children from further afield are accepted. Their siblings in subsequent years have priority over local children, who then have to go elsewhere. With siblings at different schools, parents are forced to drive to and from schools, even if one is within walking distance.

The problem is exacerbated for popular schools, where parents move into an area temporarily to get their first child into a school and then move away, knowing that siblings will be able to attend the same school.

In extreme, but not uncommon cases, such as Culverden, St John’s, St Peter’s and Village areas of town, parents have purchased a car simply to drive their 4 and 5 year old children between their home and an allocated school elsewhere. This is indefensible in light of the town’s traffic, pollution and obesity challenges.

Other infrastructure is notably stressed in the town, especially drainage, responsibility for which is shared between Southern and South-Eastern Water. In recognition of the limitations, the Inspector at the 2015 Public Hearings inserted in the Plan a policy to require drainage connections for new development to be made to the nearest point of adequate capacity.

It is also an issue for the new Plan to maximise the sustainability of development by requiring housing and employment development to be integrated into networks of footpaths and cycle paths, and complemented by social facilities wherever practical. The costs of servicing peripheral development are particularly an issue when the development lies in an adjacent authority. As discussed elsewhere, we do not foresee the resources being available to improve the transport infrastructure within the town to the point needed by major peripheral housing development, even if the impact on the urban fabric were acceptable.



f. Health

TWBC has new health obligations and is required to have policies to alleviate obesity and stress and to reduce pollution. These obligations underpin issues identified elsewhere and cover:

- Promoting physical and mental well being
- Encouraging non-motorised journeys, including for the school run
- Sport and recreation
- Supporting walking, cycling and equestrian pursuits
- Public parks, allotments and gardens

3) Response

a. Housing

At the public examination of the Site Allocations Plan in 2015 the Inspector accepted that the existing Rural Fringe was sufficient as a buffer to specifically allocated sites in the longer term, to meet the housing supply needs identified in the Plan to 2026 and beyond.

However, this did not take account of new hypothetical “need” figures in the 2015 Strategic Housing Market Assessment (SHMA). Major expansion of the town is currently constrained by surrounding Green Belt and AONB and any change would fundamentally alter its character. We would urge that Local Plan policy recognise the value of the surrounding Green Belt and AONB. The problems of inadequate infrastructure require that new housing development is fully sustainable in terms of transport and local facilities, which intensifies the land and resource demands for new housing. This makes incremental development around the town inherently unsatisfactory.

It is also clear the task of meeting the Borough’s housing need can no longer fall primarily on Royal Tunbridge Wells and Southborough. It is clear that the percentage allocation of new dwellings to Royal Tunbridge Wells and Southborough should be greatly reduced relative to the 84% achieved recently so as to avoid the wholly unsustainable situation where some 9720 new dwellings might be required in the two towns by 2033.

We believe that existing Green Belt and AONB 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 an extrapolated calculation of housing “need”. For the purpose of assessing housing capacity the new Local Plan should be based on generally maintaining the existing Green Belt and AONB, though not ruling out some Green Belt compatible uses (e.g. playing fields).

If the unmoderated OAN housing targets for the Borough cannot be reduced, the town constraints dictate that the projected housing should be distributed more evenly between different parts of the Borough under the new Local Plan. We accept that some new housing additional to the 2016 SADPD allocated sites may have to be provided in RTW itself and some in the existing Rural Fringe if current infrastructure problems can be resolved. Much of this is publicly owned land and we would urge a pro-active approach to facilitate its redevelopment. If the Rural Fringe site at the former refuse tip and additional land on the A21 corridor were made available for employment, land within the existing LBD could be redeveloped more sustainably for housing.

b. Transport

TWBC’s Transport Strategy aims to achieve a more sustainable, better integrated transport network to promote the economy; to reduce dependence on the private car in favour of cycling and public transport; and to establish a safer, cleaner transport environment.

KCC's Active Travel Strategy⁴ aims to establish Kent as a pioneering county by making active travel an attractive and realistic choice for short journeys. The Town Forum believes that RTW can be a beacon for this solution to urban transport related issues.

Transport requires moving people and goods as efficiently, as reliably and, most importantly, as safely as possible. Efficiency and reliability can come from one or more of the following:

1. Increase number and size of roads
2. Reduce the total number of journeys;
3. Shift to more efficient mode of transport.

Evidence from around the world shows that (1) does not work in an urban setting and RTW's location and layout make it particularly unsuitable for increasing the number or size of roads. Many forward-looking towns and cities are planning to reduce road use and RTW can work towards this through education and employment policies which enable people to work and study near their homes and by making journeys easier by active or public transport rather than by car.

Converting journeys from cars to active travel will bring the greatest benefit in improving the experience of those commuting into / out of the town and should be the first priority. This requires a dense network of routes, segregated for walking, cycling and vehicles.

The key arterial routes north-south and east-west on which motor vehicle journeys will be concentrated are already over capacity for much of the day and smart signals or better junction design cannot materially increase capacity. A study should be made to identify the level of reduction in traffic volumes required to remove congestion on most occasions. Provisional estimates indicate that this might be 15 – 20%.

The streets between the arterial routes should be prioritised for walking and cycling, including 20mph speed limits, restricted access to through traffic on residential streets and pedestrianisation of the town centre. Restricting the number of turning conflicts will, in itself, make a small improvement to overall congestion.

An extensive green network for walking and cycling is waiting to be unlocked; nowhere in RTW is more than 2 miles from the Town Hall. In England, walking makes up 76% of journeys of less than 1 mile and 31% of journeys of 1 to 2 miles⁵. Cars make up 21% of journeys of less than a mile and 58% of journeys between 1 and 2 miles. Journeys by bicycle are currently insignificant. Since journeys of less than 2 miles account for 38% of all journeys – 66% are less than 5 miles – active travel in RTW could be transformational.

The railway infrastructure is a key transport asset with spare capacity outside peak times. Re-introducing services via the West Station, probably in parallel with BML2⁶, represents a significant development opportunity for the town. Developing High Brooms station, perhaps

⁴ <http://consultations.kent.gov.uk/consult.ti/activetravel/consultationHome>

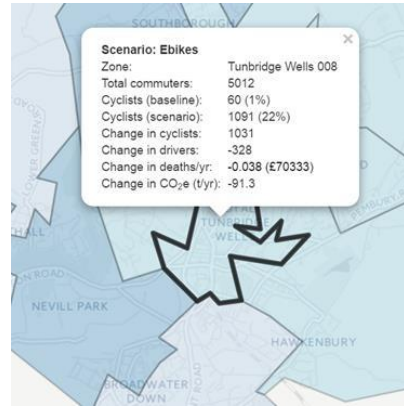
⁵ The National Travel Survey 2015

⁶ Redeveloping the West station as the main, or alternative terminus for RTW has some attractions of its own, but BML2 may be required to make it financially viable.

relocating northwards and with better bus / mini transit / cycling links would allow North Farm and the A21 corridor to be further developed.

Bus services need to be complementary to the train (why school bus services to Sevenoaks?) and can replace active travel for longer journeys and for the less able. Reducing congestion would help the service reliability and using parking charges to subsidise fares should be considered.

Whilst it is difficult to establish precisely how new technology will impact urban transport, its development cannot be ignored. For RTW, e-bikes are likely to be transformative, enabling longer and more undulating journeys to be easily made. The DfT's Propensity for Cycling [tool](#) shows how cycling could reach a 20% share of commuting journeys in the centre of town.



Replacing driven with driverless cars will, by itself, not solve congestion. If technology allows a more frequent, reliable public transit system to emerge, that could remove significant numbers of journeys currently made by car and reduce air and noise pollution, although it will have less impact on obesity and related health problems. Development in the A21 corridor could provide an ideal area for trials involving driverless vehicles.

Although measures need to be taken to avoid further degradation of the AONB and ancient woodland, developing the A21 corridor has attractions from a transport perspective. The area has few of the constraints in the inner areas, the road network largely exists and the supporting infrastructure – schools, health services, active travel, public transport – would all be easier to build. The restrictions of Green Belt, AONB and ancient woodland here require careful assessment against transport factors.

While acknowledging the dangers of densification, there is transport benefit if safe walking and cycling routes and better public transport are provided. Towns and cities with higher density populations need proportionally less infrastructure than those with sprawling suburbs.

A by-product of reducing vehicle traffic is the freeing up of areas for economic development currently occupied by car parks.

The Joint Transportation board for TWBC has already placed road safety at the top of the agenda. Reducing road danger⁷ should be a key priority in the local plan to increase levels of walking and cycling and improving the quality of life for current and future residents. Measures to reduce road danger include:

- 20mph limits, with traffic calming measures where necessary, in all residential streets
- Pedestrian refuges and crossings
- Segregated safe routes for walking and cycling to work, schools and leisure

⁷ Road safety might include measures to prevent pedestrians getting hurt by putting barriers in the way of a journey. Road danger reduction looks at removing the cause of danger and ensures that a pedestrian can complete their journey safely.

- Restricting access to residential streets for through traffic

In summary:

- Within the existing built environment, classify streets and roads according to their purpose – as a place to ‘be’ or as a traffic conduit;
- Enhance rail links including High Brooms and Tunbridge Wells West Station (BML2) and integrate complementary bus services;
- Activate green network proposal for walking and cycling;
- Require major economic development to be supported by active travel plans and non-motorised commuting;
- Consider impact of e-bikes and driverless vehicles.
- Focus new development in areas where the related transport infrastructure can be most easily accommodated
- Consider densification to reduce urban sprawl and consequent transport infrastructure
- Include road danger reduction as a key planning aim

c. Built Environment

The quality of the urban environment is an essential asset, for quality of life, for community cohesion, and to promote the economy. The strong character of much of the urban environment is at present too often lost through poor maintenance, loss of historic features, clutter and inappropriate shop-fronts, effectively a wasted asset. Tunbridge Wells is a potentially distinctive brand, with benefits in attracting business and generating tourism. Supporting increases in employment by these means will help balance the growth of population foreseen and offset further increases in travelling out to work. This is already unhealthy and should be reduced if possible.

The Council has promoted physical improvement of the town centre, including shared space, through the Urban Design Framework (UDF) and sponsoring Tunbridge Wells Together. These are necessary initiatives which should be developed and represented in the Plan. The UDF is primarily concerned with hard landscape and with the main spine of the town centre; it needs to be extended to reflect the context of historic buildings, promoting pedestrian and cycle movement and safety, and the siting of street furniture. A programme is needed to ensure UDF improvements are linked, and not wholly dependent on the development of nearby sites⁸.

Traffic management is an essential element of upgrading the urban environment, and major change is needed in key areas such as the Nevill Terrace end of the Pantiles, the Vale Road end of the High Street, and Carrs Corner. It is not satisfactory to await opportunistic development applications to deal with these points through s.106. The UDF principles need amplifying with three-dimensional designs and priorities.

Beyond the town centre, specific measures are needed to ensure that development is appropriate in scale, design and materials, and gives due emphasis to listed buildings and

⁸ The Town Forum supports the Borough Council recovering Highway functions.

the conservation area. These objectives should be given the greatest possible weight within the constraints imposed by national policy. Consideration should be given to producing an updated TWBC design guide covering loft conversions, extensions, front garden parking and the replacement of doors and windows. This would allow a more consistent approach to be taken by TWBC planning control.

d. The Arts and Culture; Leisure and Tourism

Leisure and tourism are vital growth sectors nationally and were assessed as a £260m industry in Tunbridge Wells in 2009, employing 9% of the workforce and contributing many jobs for the less-skilled. They underpin the economy through jobs in shops and services beyond the tourist business.

Changing economic, geopolitical and security factors make it feasible to expand home-based tourism in England. Leisure and recreational business spanning cultural activity, study tours, hotels and tourism, sport and green recreation such as rambling, cycling and equestrian pursuits generate a whole range of employment opportunities, from unskilled manual to higher managerial functions, largely without competing needs for land.

As a once-pioneering tourist destination and leisure resort, the town could turn its built environment and green assets to economic advantage through promoting the arts, culture, leisure and recreational employment. As well as benefitting residents, facilities such as well-maintained parks, footpaths, children's play spaces, and events such as the ice-rink and music festivals can be a major draw for visitors.

The planned significant investment over the next 2- 5 years brings a once-in-a-generation opportunity for Arts and Culture to galvanise Leisure and Tourism in Tunbridge Wells:

- The new cultural centre [name TBC] could develop into a high quality visual arts scene;
- The proposed new theatre of 1,200 seats, with a well-managed and thought-out exciting, unique and widely varied offer could attract audiences from a 30 mile radius. The Bonner Keenlyside report identified 200,000 people within TW post codes that have strong interests in the arts. Since the theatre currently attracts 58,000 annually from TW post codes this, together with tourists from London and abroad indicates room for growth.
- New outdoor spaces are needed associated with these, in addition to existing sites in the town, to provide venues for public art – permanent and temporary installations and performances – to energise the town and make art accessible to all.

Joined-up and collaborative thinking is needed amongst the town's existing and future venues – Trinity, The Forum, the Assembly Halls / new theatre and the new cultural centre – with the community and other stakeholders in order to deliver to the full range of audiences, experiences that are not otherwise available except in London, Brighton and other large cities.

The Cultural Consortium set up by the Museum is a good starting point in but needs further development if it is to realise its potential in making the arts a strong, compelling feature of the Borough. Further initiative by the Council is needed in the form of a properly resourced rainmaker with cultural experience and credibility to drive forward to a common goal.

Developing the Tunbridge Wells Together organisation is key to building up the tourism brand and its assets and reinventing Tunbridge Wells as a destination town with its unique

brand, combining arts, culture and leisure with historic urban elements and the green setting to add to the number and length of visits.

e. Education

The existing educational primary school “black holes” in RTW make education provision a key constraint on housing development in RTW. New sites should be in places where students can walk or cycle to school, with an infrastructure of a network of safe routes to schools for those walking or cycling rather than encouraging car use through facilities such as “kiss and drop”.

The opening of secondary schools in Sevenoaks provides an opportunity for KCC to redefine catchment and transport subsidy policies in favour of locality. For popular primary schools, ‘sibling first’ should have a lower priority than ‘location first’.

f. Health

Taking advantage of the opportunities highlighted elsewhere will start to address TWBC’ new health obligations on obesity and stress and on pollution. These include

- Public health campaigns promoting physical and mental well being
- Providing adequate green infrastructure to support active travel; reduce the school run
- Increasing walking, cycling and equestrian provision
- Policies to enhance public parks, allotments and gardens
- tackling air pollution by extending the AQMA to the whole of RTW
- establishing a clean air zone and taking steps to remove the most polluting vehicles
- Extending 20mph zones

g. Budgetary Constraints

The 2017/18 budget outlines the financial constraints facing TWBC. UK and global political and financial developments create further risk to the stability of financial projections. Cut backs and staff reductions in recent years have created a lean organisation. Similar moves are unlikely to yield further significant savings and experienced staff are needed for TWBC to take a proactive role in shaping the future rather than leaving it to market forces. In particular, planning decisions should be dictated by longer term objectives and not by immediate financial considerations.

Key assets should be retained for the future and repurposed rather than sold for short term gain. This could be to retain employment, to build, convert and manage social housing, or as investment properties to create income for the Borough.

There is a need to refocus on the core policies and to follow a clear strategy in all dealings where financial opportunities become available. Applications for grants and other funding for new and improved infrastructure need to be selective. As well as consuming staff resource, those that do not contribute to the strategic aims of the community lead to a sub-optimal culture of piecemeal and unconnected projects. For example:

- a. Ideas for dualling the A264 Pembury Road would go against the Borough’s Transport Strategy and KCC’s Active Travel strategy, would fail to support the needs of pedestrians and cyclists, bring no advantage to drivers who would meet a traffic jam further down

the road and would damage the 'green' approach to RTW, a key success factor (see elsewhere).

- b. S106 funds derived from the RVP extension will not finance possible pedestrian safety improvements at Carrs Corner, pedestrianisation on Monson Road, provision of cycle routes, or development of a public transport hub in the area, which seem to us to be higher priorities than the agreed allocations.

We advocate a more consistent approach to S106 agreements with a clear and agreed shopping list of TWBC and community needs as a priority. Projects that are agreed should add to the 'direction of travel'. Within the powers available to Local Government, officers should focus on infrastructure needs in every development – education, medical facilities/surgeries, public transport and active travel. For example, the new development at Hawkenbury needs funding to support segregated walking and cycling routes into town in order to remove the incentive for car use.

We recommend a further investigation into whether introducing a Community Infrastructure Levy (CIL) might enable more effective use of funds from developers. While we recognise the disadvantages, the process is more transparent, leaves less room for negotiation and might give TWBC more flexibility in determining the use of funds received.

We encourage TWBC to continue working and supporting local volunteer groups to raise funds for projects and to influence developers to understand the priorities in the town. Existing examples include:

- The Community Interest Company 'Water in the Wells' has, with minimal funding, clearly raised awareness of the importance of water features so that developers now include them as a matter of course.

For the future: We would welcome Council support for other forms of public art. Cycling facilities, public transport, low cost housing for local needs, should similarly become 'second nature' priorities.

- Calverley Adventure Grounds has raised £150,000 towards a £230,000 total in 6 months and expects to build the play space in Calverley Grounds in 2017. The campaign has been energetic, clever and efficient in sourcing funds from a variety of sources.

For the future: TWBC should look to replicate the knowledge, success and methods in attracting private sources of funds and achieving the community's goals.

A community fundraising role would assist groups to get started, provide software and systems, help to maintain momentum, set up charities and crowd-funding schemes for community projects.

4) Opportunities

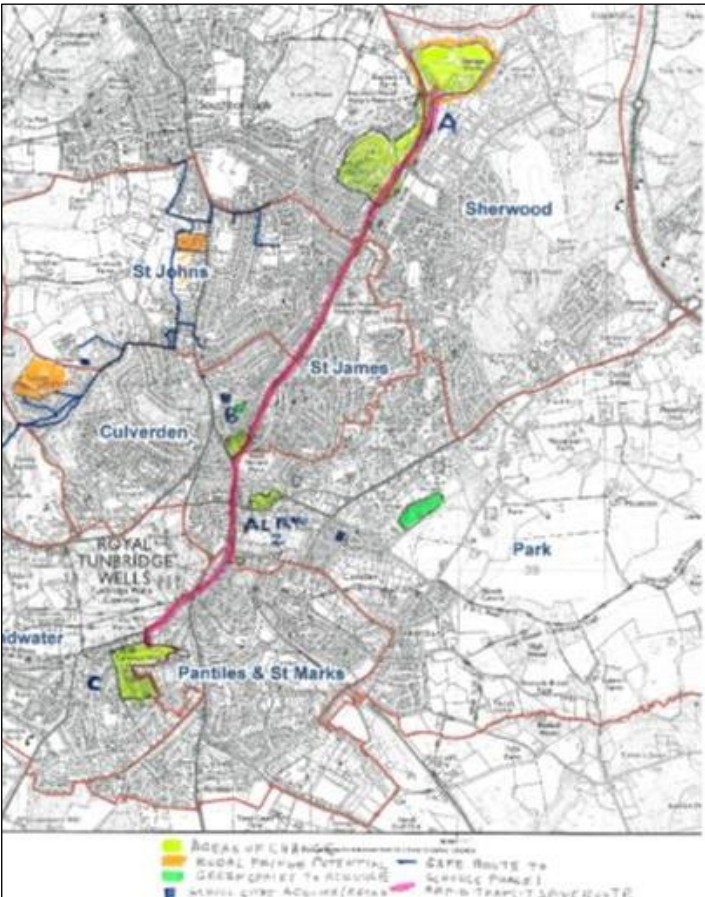
a. Garden Villages

The Town Forum welcomes the Council’s initiative in evaluating the feasibility of creating one or more sustainable Garden Villages in the Borough with schools, surgeries and transport infrastructure. Such villages could relieve both Royal Tunbridge Wells and other existing settlements of unsustainable pressures for development, while meeting realistically appraised housing need. We do not have the expertise to comment on the precise location of any such village or villages, but they should be on land not classified as AONB or Green Belt and with close access to an existing or re-opened railway line. Maximum benefit in housing number terms would be obtained if a Garden Village could be developed **without** having to do so in co-operation with one or more neighbouring Local Authority.

The development of such new sustainable settlements will take a decade or more. Should suitable sites be identified, we suggest an agreement between TWBC and national government whereby the Council undertakes to deliver the housing associated with the new settlements and the Secretary of State agrees a phasing of annual housing supply delivery figures to take account of the provision which will be made 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.

b. RTW Areas of Change

In addition to the areas in the town where comprehensive redevelopment is envisaged by the current Local Plan, there is scope to include three additional Areas of Change and to extend the scope of the already designated AL/RTW2 Crescent Road/Church Road, The three new proposed Areas of Change, which are shown as A, B and C on the map below all fall on our proposed high frequency public transport route identified by the red line.



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

The present industrial premises in the former High Brooms Brick Company quarry and Chapman Way, North Farm lane around High Brooms Station and the former Tunbridge Wells refuse tip (AL/GB4).

Relocating the present industrial premises to the west of the railway overbridge to a purpose built new estate on the site of the former tip would provide direct access to the main road network via Longfield Road. The vacated space would then be suitable for sustainable residential and office development within 5-10 minutes' walk of public transport from High Brooms station. Such redevelopment could form one end of the high frequency public transport route identified in the transport section of this response.

Area of Change B

The island in the middle of the town formed by Upper Grosvenor, Meadow, Goods Station and Grosvenor roads is not occupied optimally. A mixed-use redevelopment – residential, retail and business – would allow pedestrianisation and a public transport interchange to be developed on the route of the proposed high frequency service.

Area of Change C

The site of the old West Station, Turners factory and BT yard has potential for a substantial mixed-use, sustainable development and a major transport interchange for both trains and buses. It could be the Southern terminus for a high-frequency public transport service through the town to North Farm. The existing buildings on the site are close to life expired or easy to relocate on site, such as Sainsbury's. A continued railway heritage centre for the Spa Valley Railway would complement any such redevelopment.

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 underway. Further development of Garden Towns/Villages along the Ashford / Tonbridge main-line will reinforce the case for BML2 to relieve congestion on that line.

Area of Change AL/RTW 2

An opportunity exists to create a spacious and attractive, largely pedestrianised, mixed-use vibrant district in the eastern part of the existing Area of Change. This very large site, which dwarfs the current Civic Centre footprint, includes potential for a series of interlocking squares to include new housing units, a new mixed-use piazza, specialty shops as well as a venue for the Farmers' Market and other outdoor gatherings.

The present car park is reaching the end of its structural life and will need major reconfiguration. This might provide more spaces on the existing or modified footprint and accommodate a lower and more attractive frontage of new buildings on Crescent Road and out towards Calverley Road. Locating some car parking underground would allow better use to be made of any space thus freed, enable better pedestrian links between Calverley Grounds and St Augustines and the town centre and allow easier servicing of the new district.

c. Developing the centre of RTW

The existing initiatives to integrate traffic management, in particular bus movements, with urban realm improvements should be embedded in the Local Plan. The serious difficulties with movement, the quality of the environment, and access to commercial properties in the town centre cannot be solved merely by upgrading paving and signage. Improvement requires a dedicated plan as an SPD or DPD for pedestrianisation and street use of the public realm.

The Council is promoting a new civic centre on land at Mt Pleasant Avenue, a theatre on the Great Hall carpark and a redesigned entrance to Calverley Grounds. The Town Forum sees the case for replacing the Town Hall as resting on the principle that the new civic centre will be a re-invigorated community facility with public access, and the theatre will offer facilities to local organisations. The Town Forum gave qualified support to the development, subject to the physical design and environmental impact being acceptable; the funding being secure and affordable; and the listed features of the present Town Hall and Assembly Hall being preserved in an appropriate use.

The Town Forum endorsed the principle of a new Cultural Hub, embracing the Library, Museum, Art Gallery and Adult Education Centre and welcomes the Council's intention to improve and link these facilities within a single, distinctive institution. The new facility should be integrated with public realm improvements in Upper Mt Pleasant and Monson Road.

Appendix A: Tunbridge Wells tourist sites⁹

More than 60 attractive destinations are easily reachable for a day / half-day outing – many by train or bus – and justify a number of night's stay in RTW. The fast train service to London makes day trips between the two towns easily possible.

1. *Within the town centre:*

- Tunbridge Ware: The world's finest collection of Tunbridge Ware could be a unique tourist attraction if properly promoted and displayed.
- Costume: The extensive Costume Collection could be a regional tourist attraction if appropriately displayed.

2. *Surrounding towns and villages:*

Tunbridge Wells adjoins the High Weald Area of Outstanding Natural Beauty, with dozens of historic towns and villages including Cranbrook, Goudhurst and Hawkhurst and a wealth of historic places with interesting churches, picturesque buildings and pubs and associations with national figures. Marketing links with other centres could be of mutual benefit between Tunbridge Wells, Sevenoaks, Tonbridge, the Ashdown Forest and the High Weald Project.

3. *Historic houses and gardens of national importance:*

A radius of 25 miles includes some 45 attractive and interesting properties:

- National Trust: Alfriston; Bateman's; Birling Gap; Bodiam Castle; Chartwell; Chiddingstone; Cobham Wood & Mausoleum; Emmetts; Ightham Mote; Knole; Monk's House, Rodmell; Nymans; Old Soar Manor, Plaxtol; Quebec House, Westerham; Scotney; Sheffield Park; Sissinghurst; Smallhythe Place; Standen; Wakehurst Place.
- English Heritage: Battle Abbey / Battle of Hastings; Bayham Abbey; Eynsford Castle; Kit's Coty House; Lullingstone Roman Villa; Rochester Castle; St. Leonard's Tower, West Malling; Sutton Valence Castle; Temple Manor, Rochester.
- Other: Charleston; Chiddingstone; Firlie Place; Great Dixter; Groombridge; Hever, Lullingstone and Leeds Castles; Herstmonceux Castle and Observatory; Penshurst Place.
- Historic churches: Rochester Cathedral; Holy Trinity, TW; King Charles the Martyr; Speldhurst (Burne-Jones & William Morris windows); Tudeley (Chagall windows); Withyham (Sackville Chapel).

Other attractions easily reached for a day trip

- English Heritage: Dover Walmer and Upnor Castles; Faversham Stone Chapel; Maison Dieu, Ospringe; Pevensey, Richborough and Reculver Roman settlements;
- Canterbury (Cathedral and historic medieval walled town) 50 miles;
- North Kent towns of Chatham (Dockyards and Forts) 30 miles and Faversham 42 miles;

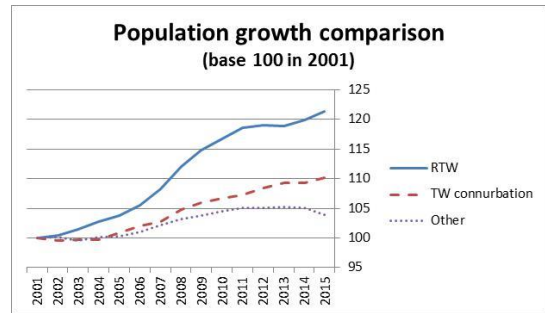
⁹ Town Forum Leisure, Culture and Tourism Working Group: "A place of pleasure and resort" January 2013; Much of this annex is drawn from a thoughtful strategy paper by John Cunningham of the Royal Tunbridge Wells Civic Society on "*The Importance of tourism to Tunbridge Wells: an assessment and proposals*".

- South Coast towns of Brighton 35 miles, Eastbourne (& Beachy Head) 30 miles, Rye & Winchelsea (Cinque Port/medieval town, Lamb’s House) 30 miles and Hastings 28 miles.
- Specialist interests, such as golf and the local “heritage railways” – Spa Valley; Bluebell; Kent & East Sussex and Romney, Hythe and Dymchurch.

Appendix B: Population tables & charts

1) The Borough’s population growth has concentrated in RTW, Southborough and Rusthall.

TWBC population increase 2001 - 2015		
RTW	8,744	21%
TW conurbation	1,618	10%
Other	1,851	4%
Total	12,213	12%



2) Recent population growth was concentrated between 2005 and 2010, since when, growth has levelled off. RTW’s infrastructure challenges have been particularly noticeable since this growth phase.

TWBC population increases		
Period	Actual	Annual %
1992 - 1995	1,400	0.46%
1995 - 2000	900	0.18%
2000 - 2005	2,200	0.42%
2005 - 2010	8,100	1.53%
2010 - 2015	2,200	0.39%
Annual projection	1,426	1.23%

3) A shortfall of residents aged 20 – 24 would merit further investigation and may reflect the lack of further education opportunity locally, entry level career jobs and the unaffordability of property in the town.

