



Planning Policy
Planning Services
Tunbridge Wells Borough Council
Town Hall
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Kent TN1 1RS

BY EMAIL ONLY

Growth and Communities

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17 April 2024

Dear Sir / Madam,

Re: Consultation on the Draft Royal Tunbridge Wells Town Centre Plan – Vision 2040

Thank you for consulting Kent County Council (hereafter referred to as the County Council) on the Royal Tunbridge Wells Town Centre Plan – Vision 2040.

The County Council has reviewed the consultation document and has provided commentary below.

Highways and Transportation

The County Council, as Local Highway Authority, supports the 'Vision' of the Plan with regards to transport and movement. The County Council is also supportive of the key principles and ambition where these coincide with policies under development for the new Kent Local Transport Plan. Whilst the Town Centre Plan is currently at a high level, the County Council would like to see further details in order to understand the impact of the proposals where they affect the highway network. The County Council is keen to work with the Borough Council to ensure that proposals are brought about safely and where junction improvements, public realm initiatives, highway trees and road space reallocation is proposed, the County Council, as Local Highway Authority, can assist in understanding the impact and suitability of the proposals and if additional mitigation will be needed.

The County Council considers that a Transport Assessment would be helpful to identify the potential modal shift arising from the new pedestrian, cycle and public transport infrastructure, the redistribution of traffic arising from the proposals and the impact on the highway network. This would benefit from the use of a microsimulation transport model such as Vissim and junction capacity assessment software. The County Council, as Local Highway Authority, can assist with this via use of the Kent Transport Model service and would welcome engagement in the consideration of the scoping of a new Transport Assessment.

It should be noted that where highway trees are to be impacted or new highway trees proposed, engagement should take place with the County Council Landscaping Service¹.

Public Rights of Way (PRoW)

The County Council is keen to ensure its interests are represented with respect to its statutory duty to protect and improve PRoW in the county. PRoW is the generic term for public highways known as Public Footpaths, Public Bridleways, Restricted Byways, and Byways Open to All Traffic, each of which are recorded on a relevant Definitive Map. The County Council is committed to working in partnership with local and neighbouring authorities, councils, and others to achieve the aims contained within the County Council [Rights of Way Improvement Plan](#) (ROWIP) and the County Council [Framing Kent's Future](#) strategy for 2022-2026. The County Council is seeking to ensure its residents enjoy a high quality of life with opportunities for an active and healthy lifestyle, improved environments for people and wildlife, and the availability of sustainable transport choices.

The County Council supports reference to Policy STR/RTW 2 (of the submitted Local Plan 2021 - 2038) which will give strong policy direction in support of enhancements within the public realm – including measures such as the creation of pedestrian and cycle-friendly environments and linkages with adjacent Low Traffic Neighbourhoods. The consultation document states the town will, amongst others, provide *“more and better cycle infrastructure and storage facilities”* and redefine its streets *“into high quality spaces where active travel, public transport and shared mobility are the natural and convenient choice for most journeys”*. This is supported by the County Council.

The County Council seeks to protect and enhance the PRoW network, which does exist within the Plan area. These can be identified using the County Council [online mapping tool](#). Furthermore, there are some Promoted Routes entering the Plan area which should be identified and recognised accordingly.

The County Council is also keen to ensure consideration of wider PRoW principles and provision of accessible routes, particularly for cyclists and walkers, so as to achieve the goal of a high quality of life for residents and visitors. The County Council considers further work is required to identify a town-wide Active Travel strategy alongside specific deliverable schemes. Active Travel schemes must deliver to an overarching and integrated strategy and must not compete with, or contradict, each other.

The County Council would welcome joint working in respect of projects where the PRoW network is involved, and this partnership working should be recognised within the Plan, with an understanding of the roles and benefits that different parties can bring to a scheme. Furthermore, the County Council recommends that the Plan should seek to identify early sources of funding.

In reviewing the various sites as shown within the Interim Town Centre Sites Assessment, the County Council identified only one that may impact on a PRoW – TC1, The Russell

¹ EE.SoftLandscapeTeam@kent.gov.uk

Hotel. Public Footpath WB64 runs adjacent to the site and the County Council will need to be consulted early in any scheme development, especially where there are any changes to the status of the public highway.

It is considered the Plan could be enhanced with the introduction of a Glossary. PRow are acknowledged within the Plan but not currently defined and this is recommended to ensure understanding of the PRow network. The principle of Active Travel is referenced throughout the Plan and this should also be defined - the definition used by KCC for its [Active Travel Strategy](#) is encouraged.

Sustainable Urban Drainage Systems (SuDS)

The County Council, as Lead Local Flood Authority, is pleased to note that consideration of the installation of 'blue infrastructure' has been included within the Connected Landscapes section and would strongly encourage its consideration and use in any future proposals associated with the Town Centre. It is also encouraging to note that green roofs and sustainable building design are considered within the Town Centre Living section. With specific regard to the Town Centre Living section and 'buildings', the County Council would encourage the Borough Council to consider what could be retrofitted to existing properties such as Borough Council buildings and managed infrastructure. For example, it is possible to retrofit green roofs to existing structures such as bus shelters and cycle stores, as well as conventional built structures.

However, the County Council is disappointed to note that the Plan itself has limited regard to the opportunities to install Sustainable Drainage Systems as part of any public realm improvement scheme, particularly given that "*Flooding and increased risk of the effects of climate change*" are specifically detailed as a threat to the built environment. The County Council would request that consideration be given to the requirement for the installation of SuDS systems alongside any public realm improvement scheme. Whilst always preferable, the County Council would highlight that these do not necessarily require above ground 'green systems' but that there are also features and methods which allow for SuDS systems to be installed in such a way so as to be unobtrusive and space efficient. These include the use of permeable paving combined with an underground attenuation system which can provide significant benefits to flood risk without affecting on street parking provision.

The County Council would also highlight that there appears to be no mention of the application of the sequential test as required by the National Planning Policy Framework with regards to the Town Centre Sites allocation, specifically site TC12, Torrington Car Park. The Lead Local Flood Authority would remind the Borough Council of the requirement for this to consider the risk of **all** forms of flooding with regards to the suitability of a site for development in relation to its Flood Risk Vulnerability classification. It is the County Council's understanding that the exemption for the test requirement associated with a change of use only applies whereby building footprints are not altered.

The County Council would also expect reference to be made to both the Surface Water Management Plan and Strategic Flood Risk Assessments for Tunbridge Wells within the Plan as well as their consideration in the determination of available sites and indeed required

improvements which could be undertaken as part of a public realm/built environment improvement scheme.

The County Council, as Lead Local Flood Authority, is willing to engage to discuss the points raised or to investigate possible SuDS solutions that could be installed within any of the Town Centre quarters detailed in the Town Centre Plan.

Heritage Conservation

Tunbridge Wells has a unique history in Kent as a spa town and resort established in the 17th century. As such it has a unique built environment that largely retains its character and integrity. The town is also located in the High Weald, one of Europe's outstanding medieval landscapes and so it is surrounded by a rich historic landscape, and includes archaeological sites from earlier periods. It is some years since its overall built and archaeological heritage, and links to the historic landscape, have been considered holistically. The latest is the [2004 Historic Town Survey for Tunbridge Wells](#). A revision of this report is required, and the Town Centre Plan provides an opportunity to do so. A revised Town Survey could bring together the built heritage and other data, describe the evolution of the town using the most recent interpretation of the information, and identify opportunities for heritage enhancement as well as locations for conservation. An example to follow could be that of [Oxford](#). The County Council would be happy to discuss this further with the Borough Council.

The County Council would draw attention to the importance of the consideration of design at an early stage the town plan development so that the character of an area such as Tunbridge Wells is retained. It would be helpful if any guidance that the Borough Council intends to refer to is mentioned in the draft document so the requirement to follow it is made clear to those preparing development proposals. The County Council would welcome discussions regarding the content of any design guidance as it would be useful to explain requirements for archaeological evaluation within it.

Although the Town Centre Plan covers central Tunbridge Wells, and thereby an area that has already been largely developed, there is still the potential to impact on archaeological remains related both to the early history of the town and to periods from before the urban settlement of Tunbridge Wells existed. At present, although the heritage of the area is included in the consultation document, there is no mention of its potential archaeological heritage. The County Council would suggest that that page 11 be modified accordingly:

"include over 150 listed buildings, a large Conservation Area covering much of the town centre, and other distinct areas such as The Pantiles and the Calverley Grounds, which is a designated historic park and garden. There will also be undiscovered archaeological sites in the town, related to both the early history of Tunbridge Wells and to more remote periods."

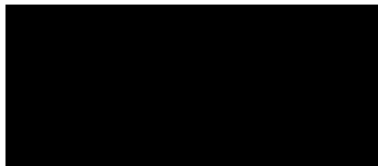
In respect of page 13 of the Plan, 'Background', the consultation document could usefully refer to the [Tunbridge Wells Historic Environment Review](#) that was developed in 2018 to support policy development. The County Council is unclear as to whether the Heritage Strategy that was intended to follow the Review was ever actually developed. If so, it should be referred to here. If not, the Plan could usefully contain a commitment to do so.

In respect of page 14, 'SWOT analysis', Tunbridge Wells undoubtedly contains undiscovered archaeological remains. Indeed, the lack of understanding of Tunbridge Wells' early history provides an opportunity to engage residents in its study. The SWOT analysis could therefore be amended to:

Heritage value – numerous historic buildings, conservation area and registered park/gardens, undiscovered archaeological remains.

The County Council would welcome continued engagement as the Town Centre Plan progresses. If you require any further information or clarification on any matters raised above, please do not hesitate to contact me.

Yours faithfully,



Stephanie Holt-Castle
Director – Growth and Communities