

Annex 1

Name	Comments	Proposed Response
Sport England	<p>Welcomes the commitment to secure leisure and recreation facilities. No indication of the quantitative mix of uses that are sought so not possible to estimate the quantity of housing units that may be forthcoming or the appropriate level of sport and recreation facilities to meet demand. Urge the Council to follow a planned approach to the provision of pitches in line with an up to date Council Sports Strategy & Playing Pitch Strategy to ensure that future demands are met.</p>	<p><i>Support noted. An additional section to reflect the Council's planned approach to the provision of leisure and recreation facilities will be added to section 3.0</i></p>
	<p>Refer to Sport England's 'Planning Contributions Kitbag' providing templates of planning obligations and community use agreements to secure more sports related benefits. Welcome proposals for Tonbridge Central Area Fund to pool developer contributions.</p>	<p>This document will provide useful information as part of the detailed planning application process.</p>
	<p>Support provision of on site sport and recreation facilities as part of a vibrant mixed use regeneration of this site. Welcomes and supports the Design Criteria to contribute towards providing a district that encourages informal recreation by encouraging walking and cycling to destination points or as a leisure activity.</p>	<p>Support noted.</p>
	<p>Refer to Sport England publication 'Active Design' to ensure that regeneration of large sites provides opportunities for recreation to take place either formally or informally as part of everyday activities, through designing in activity.</p>	<p>This document will provide useful information as part of the detailed planning application process.</p>

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Dr Colin Black	Planning Brief needs an explanation as to why this area has been selected.	Agreed. The Brief could be clearer to express this. New paragraph proposed in Section 1.0.
	Botany area is established from traditional land ownership patterns and is not a particularly helpful definition in operational terms	Comments noted.
	Expand area to include station car park area and Sovereign House. Any plans brought forward for these sites should be done in reference to the wider Botany area – otherwise there is a danger that any future plans for Botany will fail to recognise the wider opportunities. Are both river banks included in the red line or is it to the water edge on the north bank?	The Botany brief specifically covers this area because it has the most immediate potential for redevelopment and is particularly lacking in design quality. However, any development that takes place within the boundaries of the Botany area development brief will need to have regard to the wider area and an appropriate addition to Section 4.0 is recommended.
	Include in para 3.8 reference to the need for travel plans to accompany the TA (in line with PPG13) to demonstrate how accessibility will be maximised, car-use managed and the use of more sustainable methods of transport promoted.	Agree. Amendment to para 3.8 is proposed.
Tonbridge & District Railway Travellers Assoc.	Is there sufficient on-site parking and access capability to be able to create a workable development?	Yes. The development will include appropriate parking levels (covered in Section 4.0 of the brief).

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	<p>Concerned about intention to reduce the number of parking spaces overall (para 3.9) in light of the intensification of uses.</p>	<p><i>There is no intention to reduce the number of car parking spaces overall, but to make better use of the parking provision. This needs to be clarified and amendments to para 3.9 are proposed.</i></p>
	<p>Multi-level car parks are often unappealing places to leave or collect a vehicle, especially after dark, their ambience is all important. Security and flooding vulnerability will need to be addressed.</p>	<p>There is no reason why multi-level car parks have to be so unappealing. The Council will only accept proposals for multi-level parking that are well designed and can achieve 'Secure By Design' standards. This includes addressing issues such as flooding, lighting, access and security. An addition to this effect is suggested at paragraph 4.20.</p>
	<p>Welcome efforts to reduce pressure on car parking spaces by varying the modal split but concerned as to how the bus quality partnership (BQP) will achieve this. Two major constraints on increased bus usage are: the convenience of car usage for comparison shopping and the lack of buses in the evenings for leisure trips. Suggest BQP should examine the need for increased frequency and should review the location and convenience of bus stops in Tonbridge High Street relative to the proposed new retail outlets in the Botany Quarter. Also consider later running of buses into the evening with joint ticketing arrangement between bus companies and taxi firms to provide alternative transport late at night and help police promote public safety.</p>	<p>BQP will include measures to make bus usage more appealing. These are all excellent points that can be pursued with Bus operators and to a degree incorporated in the Travel Plan for the development. Add reference to a Travel Plan at para 3.5.</p>

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	Development Brief for Sovereign House should include requirements for a pedestrian and cycle way through the site convenient to the desire line for the bridge over the Botany Stream to the Waitrose/Iceland entrances and car parks. Current route is inconvenient, unattractive and prone to flooding.	This important issue is covered in para 4.3 of the brief.
	The specialised nature of the residential usage on this site casts doubt on the practicability, particularly on Saturdays of shared use of parking spaces by shoppers and residents.	Shared use of parking spaces by shoppers and residents is common practice in town centre locations and works well if managed properly. This is mainly an issue about how parking areas are managed, and experience from other areas shows that this is a workable solution that maximised the best use of land. A reference to shared parking management potential should be included in para 3.9.
	Reservations regarding capacity of the road structure to support partial pedestrianisation of the High Street. Intensive development of this site will only exacerbate this situation, with access and egress being problematical.	Pedestrianisation is <u>not</u> proposed, even in part although the opportunity for some environmental improvements for pedestrians is proposed.
	Assume that long-stay parking spaces provided in the area off Sovereign Way may ultimately be phased out? Considers that the Council has a duty to assign sufficient areas within walking distance of the station for all-day rail travellers parking.	The responsibility to provide long stay car parking within walking distance of the station for all-day rail travellers parking is largely the responsibility of the rail company. The Council's duty is to make the best use of land and to ensure that there is appropriate car parking in the town centre to meet the needs of the centre and promote economic prosperity.

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	Questions the brief's assertions that there is a need for larger retail units in order to attract retailers to the town.	Disagree. Modern retailers have specific needs in relation to unit size. There is a clear demand from retailers for larger units which is borne out by survey work.
	Both of the 'Squares' appear to be limited in scope, especially the proposed Angel Square. If surrounded by tall buildings this will make them unpleasant and claustrophobic. They both appear to face north despite statements that they should be oriented to the West to catch the sunlight.	The urban structure is indicative of what <i>could</i> be built. The use of materials and more detailed design need to prove that they will be pleasant public space.
	By way of correction to Appendix B, Angel Walk is open 24 hours.	Comment noted. Correction made.
Tonbridge Civic Society	Agrees Botany area provides best scope and opportunity for regeneration and re-development but site should be extended to include the Sovereign House site and consider Botany as a whole to provide an integrated urban design scheme for both sides of the Botany Stream.	Support noted. Reference to the relationship with adjoining site to be included in Section 4.
	Improvements to the east side of the High Street and main riverside will be kept in mind?	Improvements to the east of the High Street and main riverside remain a priority and the Council will seek these through the bringing forward of other redevelopment proposals.

Name	Comments	Proposed Response
	Supports improvements and introduction of public spaces, riverside access, walkways and cycleways.	Support noted.
	Priority will be given to achieving a high quality and well-designed public realm and that civic rather than commercial elements will be dominant?	Agreed. Support noted.
Tonbridge Civic Society (continued)	Suggests commissioning of an urban design scheme at the outset and using this to monitor the design quality of new buildings might more easily achieve the high standards sought. Final results should have a human scale and provide attractive, safe and sheltered areas for the general public.	Agree. These detailed matters will be dealt with at the planning application stage. A detailed design statement will be received.
	Suggests amendments to the Core Strategy stating the Council's vision for the town centre.	The Core strategy has now been formally adopted and cannot be altered until it is reviewed in the future. In any event the Core Strategy sets the overall planning policy for the town centre.
	Strongly approves of the statement "it is essential that the development is not regarded as a shopping centre scheme with ancillary uses, but as a fully functioning area within the town". An urban design scheme would help to sustain this concept, by highlighting spaces most conducive to public use and enjoyment	Support noted.

Name	Comments	Proposed Response
	<p>Include Town Museum. The purpose underlying the relocation of sports facilities needs to be clearly defined as the current central provision provides easy access from all parts of the town.</p>	<p>The site will accommodate a mix of uses including enhanced and replacement facilities for use by the local community. It is envisaged that this may include exhibition space. Any sports and leisure facilities will be set in appropriate locations that are easily accessible.</p>
<p>Tonbridge Civic Society (continued).</p>	<p>Applauds proposed shift from private car use but wishes to see more explicit plans for alternative, regular and affordable provision. Deplores the need to bring increased traffic to Bordyke via Cannon Lane. London Road/Hadlow Road Link Road should be speedily implemented to sustain the Botany development. Welcomes suggestions for new bridges across river to accommodate cyclists and pedestrians, especially if can be imaginatively and sensitively designed.</p>	<p>Comments in support of the Tonbridge AAP Transport strategy noted.</p>
	<p>Welcomes design criteria, especially the emphasis given to creating attractive outdoor walkways with linked colonnades and arcades to provide weather protection. Concerned about how an integrated design is to be devised without an overall urban design scheme to support this brief. Concern about the size of urban blocks suggested.</p>	<p>Comments noted. More detailed design of the scheme will be provided at the planning application stage when an overall design statement will be required.</p>
	<p>Support concept of active frontages, especially where they enhance the riverside frontage.</p>	<p>Comments noted.</p>

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Tonbridge Civic Society (continued)	Support for corners, land mark buildings and street furniture to improve the townscape. Maintaining the Tonbridge Skyline is a desirable feature and will require imagination to incorporate decked car parking successfully	Comments noted and agreed.
	Support the objectives of mixed-use development, sustainable building design, and determining a palette of high quality materials to establish the character of the Botany development.	Support noted.
Network Rail	Local highways difficulties and congestion at key junctions mean that the Botany area cannot be seen in isolation. Its traffic generation, impacts and solutions should have regard to other nearby key sites on which the Council is encouraging redevelopment. Otherwise, there is a risk that other sites will find the network over capacity and without the funds to solve the problems – leaving important central sites un-developable.	A traffic model for the town centre has been developed as part of the Tonbridge Central Area Action Plan will provide a co-ordinated approach for the assessment of developed sites.
Network Rail (continued)	The scheme should contribute to Station improvements as part of its approach to Green access.	Network Rail's own land is intended and proposed for redevelopment and this will fund improvements to the railway station. Where identified in Traffic Impact Assessments and Travel Plans, the appropriate contributions will be sought.
WYG (Sainsburys)	Generally supportive of Brief.	Support noted.

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	<p>Not all land uses promoted in Para 3.4 maybe accommodated due to site constraints such as flooding and building heights. Additionally, significant market research would need to be undertaken to influence the correct mix of uses. This would ensure that the vitality and viability of the town centre is maintained and that there is no overprovision of a particular use.</p>	<p>Para 3.4 provides a combination of land uses that are promoted by the brief, and not an exhaustive list of uses that <i>must</i> be provided.</p>
	<p>Support suggestion in Para 3.5 that some sports facilities could be relocated to alternative locations. Certain activities would be better located adjacent to large outdoor sports facilities where provision is more easily accommodated.</p>	<p>Support noted.</p>
	<p>Landowners should be encouraged to embrace proposals to improve linkages day and night between the site and the High Street to secure 24 hour access.</p>	<p>Comments noted. Incorporate amendment to Section 4.0 to draw out importance of linkage.</p>
	<p>Podium design solution should be reiterated within the Design Criteria section of the Brief as the retail units are unlikely to be located at the same level as the current surface car parks.</p>	<p>Comments noted. The design solution to deal with levels, flood mitigation and access should be included in Section 4.0.</p>
	<p>Supports sections on urban structure, streets and spaces and active frontages and the need for larger format retail units.</p>	<p>Comments noted.</p>
	<p>Describe urban structure diagram in Para 4.2 as being flexible and dependant upon the site constraints. Similarly, the number of landmark opportunity sites identified might not be achievable due to land use requirements and the need to maintain the safe</p>	<p>Figure 3 is an indicative diagram showing a possible urban structure for the Botany area. There is room for flexibility in this structure but the main design principles remain. Suggest Para 4.2 is reworded to reflect this flexibility.</p>

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	operation of the petrol filling station and service yard access.	
	General support for Para 4.20 however, it should be noted that due to operational requirements such as access ramps and ventilation, not all the facades of decked car parking can be wrapped with additional uses. They can still be finished with quality materials and face onto lower priority public realm areas.	Comments noted. This is a detailed matter but the operational requirements will themselves need to be treated carefully in the decision.
Southern Water	Proposed residential development should be no closer than 15 metres to the boundary of the Botany Wastewater Pumping Station to reserve residential amenity from potential noise and odour effects and to ensure access to the site.	Development will not be within this distance.
	As there are a number of sewers crossing the site, ensure access to this infrastructure for the purposes of maintenance and upsizing. The sewers must not be built over and the layout of the proposed development must take this into account.	There are important technical matters that will be vital in the detailed design and construction of the scheme.

Name	Comments	Proposed Response
	<p>If required, division of sewers may be possible at the developers' expense, provided a feasible alternative route is available. The need to take into account the location of existing above ground and underground infrastructure in the layout of the development should be highlighted in the planning brief.</p>	<p>Comments provide technical information that is too detailed to be included in the brief and will be addressed at the planning application stage.</p>
	<p>Additional requirement should be included in Phasing Section to include the provision of sewerage service to the site. Inadequate sewerage infrastructure may lead to service failures such as flooding of property and environmental pollution. Add following bullet point to Para 3.24 "The provision of sewerage infrastructure"</p>	<p>Agreed. Amendment as suggested.</p>
	<p>Welcome requirement in Para 3.22 for planning applications to be accompanied by site specific Flood Risk Assessments.</p>	<p>Comments noted.</p>
	<p>Surface Water Management: surface water to be separated from the foul sewerage system to minimise the risk of inundation of the system after heavy rainfall, and consequent foul water flooding. Surface water for this site should be discharged directly to the River Medway subject to approval by the Environment Agency.</p>	<p>This is a detailed technical matter for design and construction and for assessment at the detailed planning stage.</p>

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	<p>The capacity of the existing local sewers is insufficient to meet the demand of development. The local sewers need to be upgraded before development can connect into it. Fat's view is that the developer should fund investment to local infrastructure for improvements required to service new development. The need to requisition sewer infrastructure contributes to the cost of the development and should therefore be identified in section 3. This will provide early warning to the developer.</p>	<p>Agreed. Include appropriate addition at Para 3.24.</p>
	<p>Insert the following paragraph in Section 3.0 Sewerage: Para 3.28 Foul water sewers to serve development should be constructed to adoptable standards in accordance with the current edition of "Sewers for Adoption", published by Wry.</p>	<p>Comments provide technical information that is too detailed to be included in the brief and will be addressed at the planning application stage.</p>
SEERA	<p>Highlight the need to ensure consistency between the various local development documents being brought forward relating to the Botany area, including the key diagrams/ other visuals.</p>	<p>Comments noted.</p>
ARRIVA	<p>Welcomes such a redevelopment provided the infrastructure in the surrounding area is able to support it. It is vital the various transport management issues highlighted in the TCAAP are satisfactorily resolved before this redevelopment has a negative impact.</p>	<p>Comments and support noted.</p>

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	It is vital that where pedestrian links join the High Street there is sufficient space for reducing the conflict between traffic and pedestrians.	Comments noted.
	The pedestrian links to the High Street must not be perceived as barriers and should provide excellent public realm architecture that entices pedestrians and provides a safe and attractive environment. This will help to encourage the use of public transport as walking between the various offers in the town centre will be seen as an attractive option.	Agreed. Amendment to Section 4.0 recommended.
	Bus stop locations may need reviewing to ensure they are both relevantly placed for pedestrians and contribute to pedestrian safety and access.	Comments noted,
John Rutland (West Kent FSB)	1.1 Agree Botany and Angel areas are key development site but should be an engine to regeneration of the town centre, not the focal point.	Comments noted.
	1.8 Agree that Botany and Angel can attract enhanced retail outlets but plan should protect town from cloning and we should ensure that provision is not monopolised by just one of the giant retailers.	Comments noted and agreed. Covered in Draft Brief.
	Refreshment facilities should not occur at the expense of the High Street.	There is a need to provide a range of services and facilities that enhance the overall town centre and this will include the additional provision of refreshment facilities. However, the Council's view is that this will enhance the High Street.

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	Other leisure facilities should be considered e.g. bowling, snooker, darts and other indoor televised sports to attract people to stay in the town for refreshments.	Comments noted. The provision of leisure uses is within the Planning Brief. The final uses will be dependent on market interest.
	1.10 Totally agree any new development should be the driver for regeneration to the whole area of Tonbridge not just a focus point for visitors to walk around then leave.	Comments noted.
	1.15 Could the storage tanks under Sainsburys/Beales be expanded and a distribution point to route flood waters away from Tonbridge by large storm drains?	A good practical point. Measures to deal with flooding will be detailed through the Flood Risk Assessment that is required with planning applications for each site.
	2.2 Agree Tonbridge is regional hub and should be totally accessible.	Comments noted.
	2.3.1 Concerned about Tonbridge entering into competition with other town centres – impact on West Kent as an area.	Comments noted. The aim for Tonbridge is to find its own level of activity. It is currently under-performing in retail terms.
	2.3.2 Agree a range of Cultural, Leisure and Tourism facilities to attract visitors is needed.	Comments noted.
	2.3.3 & 2.3.4. Access and existing town centre must be congestion free or investment will be wasted.	Comments noted. The AAP Transport strategy seeks to reduce congestion by capacity improvements and sustainable transport initiatives.

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	2.3.9 Housing close to town centre could end up as commuter dorms rather than housing employees to Tonbridge. 2.5, 3.21 & 3.22. Affordable housing is a must or town workers will need to commute in, adding to traffic volumes.	Comments noted. The Council has robust policies to secure affordable housing.
	Agree Botany development should not only be integrated with the High Street but enhance the High Street by planning footfall to benefit the whole retail area not just new shopping centre.	Comments noted and agreed.
	Widen the bridge outside the train station to provide a larger link point for rail, bus, taxi and vehicle pick up and drop off. Suggest placing bus and taxi points only at railway station and north of the Big Bridge to encourage people to walk through the town or deter them from coming by car.	The suggested improvements to the station vicinity are expected to come forward as part of Network Rails proposals. Comments concerning bus and taxi stops are helpful and can be pursued with operators.
	3.12. Agree gateway points for vehicle access into and existing Tonbridge need to be clearly identified. Try to have vehicles access Tonbridge via the A21 Vauxhall Lane/Inn junction rather than via Quarry Hill with new slip road from and to A26 at the top of Quarry Hill. Along Woodgate Way and access the town centre via Sovereign Way, Ave Du Puy and Vale Road gateways – only allowing traffic the option to exist via Medway Wharf Road and Vale Road to ease Woodgate Way traffic flow out of the town centre area. Park & Ride scheme?	These are all very helpful and constructive comments that have an implication wider than the Planning Brief.
	3.16. Agree any new development should take its design concept from and enhance the historic character of the town.	Comments noted.

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	3.17. Agree there are opportunities for pedestrian and cycle routes that should guide footfall past as much retail property as possible generating numerous opportunities for retail sales.	Comments noted.
	Will the recent planning permission for a 12 storey glass building set precedence for tall buildings in the Botany/Angel area?	The design, scale and massing of development in the Botany area will be in keeping with the Tonbridge skyline. The opportunity exists to bring new but high quality architecture to the town centre.
Environment Agency	Support for Site Specific Flood Risk Assessment to be provided with every planning application.	Comments noted.
	Expect sites to be developed on a sequential basis, with higher risk development, such as residential dwellings, being located in lower flood risk areas and this should be made clear in the planning brief.	This will be addressed by the site specific Flood Risk Assessment and the detailed locations of uses will be considered in that context.
	Expect sustainable drainage solutions to be adopted with regard to surface water drainage, subject to other constraints such as groundwater contamination.	Comments noted.

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	<p>The Environment Agency will actively support the regeneration subject to the provision of satisfactory flood protection measures.</p>	<p>Comments noted and welcomed.</p>
	<p>Drainage: Site overlies the Tunbridge Wells Sand, classed as a minor aquifer. Source Protection Zone III for the New Wharf public water supply abstraction is on the edge of the site. Groundwater levels are expected to be very shallow throughout the area, making the site vulnerable in terms of aquifer protection. Supports inclusion of Sustainable Urban Drainage Systems within new developments. Subsurface drainage systems may have to be limited in terms of depth and location in order to prevent direct discharges to groundwater. We would also seek to prevent and discharge to land affected by contamination or areas of fill. Adequate pollution control would also need to be included to prevent pollutants from road or parking areas discharging into the ground.</p>	<p>Comments provide detailed and technical information to be addressed at the planning application stage. General addition at para 3.25 drawing attention to general drainage and groundwater conditions recommended.</p>

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	<p>Land contamination: Mixed use development introduces vulnerable receptors such as permanent residents into a previous industrial and commercial area. It is essential that risks are assessed for all the new developments as to whether contamination is in, on or under the ground at each site. Potential sources of contamination must be investigated before new developments are constructed to ensure condition of the site is appropriate to the intended end use.</p>	<p>Comments provide detailed and technical information that will be addressed at the planning application stage.</p> <p>General addition to Planning Brief at para 3.25 recommended to draw attention to the points made.</p>
	<p>Water Resources: Development should adhere to the water resources commitments set out in the KMSP. EA expect an ongoing, proactive approach to the efficient use of water throughout the lifetime of this development.</p>	<p>Comments noted.</p>
	<p>Biodiversity: Lack of mention of the potential ecological gain in the redevelopment of what is an area devoid of wildlife value by virtue of the excessive amounts of built development. Would like to see inclusion of ecological enhancements to help future developments satisfy PPS9. Potential opportunity to de-culvert a stretch of the Botany Stream which may offer some flood risk benefits as well as potential wildlife enhancement. The riparian land around the stream, including the proposed town squares offer the potential for ecological enhancement in combination with the proposed use as public spaces. Watercourses and surrounding riparian land are crucial as wildlife corridors and within a highly urbanised environment, are clearly potential aesthetically and ecologically beneficial features to enhance and restore.</p>	<p>The water management regime and the treatment of banks will take account of and maximise the opportunities for bio-diversity.</p>