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BY EMAIL

Charlotte Glancy  
Tunbridge Wells Local Plan Programme Officer  
C/O Banks Solutions  
80 Lavinia Way  
East Preston  
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10 June 2022

Dear Ms Glancy,

## Representations on behalf of Abrdn

On behalf of our client Abrdn (formally Standard Life Investments UK Real Estate Fund), CarneySweeney write to confirm our intention to participate in the Matter 10 (Employment, Economic Development and Infrastructure) and Matter 11 (Retail, Town Centre and Community Facilities) hearing sessions on 7<sup>th</sup> and 12<sup>th</sup> July respectively.

You will be aware that WYG and latterly Tetra Tech made representations on behalf of Standard Life Investments UK Real Estate Fund. Standard Life Investments UK Real Estate Fund are now known as Abrdn and they have appointed CarneySweeney to continue to pursue those representations at the Examination.

Accordingly, Abrdn wish to rely on the written representation made on their behalf in all respects and we will be participating at the above hearing sessions specifically in respect of representations pursuant to Policies ED1, ED10 and the omission of Knights Park as a leisure allocation in the emerging Local Plan. It is emphasised:

- **Policy ED1 (Key Employment Areas)** – Draft Policy ED1 assigns preference to new retail, food and drink and other leisure floorspace development in the Royal Tunbridge Wells North Farm / Longfield Road area and other out of centre locations. The implications of this on town centre vitality and viability and on employment land supply has not been assessed. It is contrary to national policy and is unjustified.
- **Policy ED10 (Sequential Test and Local Impact Test)** – As currently drafted, the policy fails to provide a suitably worded over-arching retail, office and leisure use policy to guide such proposals in Tunbridge Wells Borough Council. It is contrary to national policy and is unjustified and is not effective. We urge the Council to re-consider our representations previously made, particularly in regard to the sequential test and the threshold for impact assessments.
- **Former Policy AL/RTW 15 (Land at Knights Park)** – We continue to object to the omission of AL/RTW 15 (Land at Knights Park) as the preferred location for leisure uses outside of the town centre itself. In



conjunction with the permissive nature of ED1 for Class E uses in out of centre locations, the removal of AL/RTW 15 leaves the leisure park in a negative position with regard to accommodating large scale leisure use that cannot be accommodated within the designated town centre, notwithstanding its clear and established role as an important leisure destination in the borough. The omission of the policy is unjustified.

We hope the above clearly summarises our position. Should you have any queries or wish to discuss please do not hesitate to contact us.

