

EXAMINATION STATEMENT

TUNBRIDGE WELLS LOCAL PLAN EXAMINATION

RESPONSE TO MATTER 11: RETAIL, TOWN CENTRES AND COMMUNITY FACILITIES

For:

TOWN AND COUNTRY HOUSING

Prepared by:

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Issue Date:
JUNE 2022

File Reference: 700549

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DOCUMENT VERIFICATION

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FOR: TOWN AND COUNTRY HOUSING

FRANKHAM PROJECT NO.: 700549

Signature:

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Issue Purpose	Revision	Issue Date	Prepared by	Reviewed by	Approved by
	PO1	May 2022	C Stephens	O Morse	O Morse
	PO2	June 2022	C Stephens	O Morse	O Morse

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1.0 INTRODUCTION

- 1.1 Frankham Projects act on behalf of Town and Country Housing (TCH).
- 1.2 TCH is a key stakeholder at the Showfields Estate (which is included within the Plan at Policy AL/RTW15), and holds a majority ownership of the maisonette and apartment blocks.
- 1.3 This statement is made in respect of Matter 11 (Retail, Town Centres and Community Facilities).
- 1.4 It follows the submission of representations to the Regulation 19 Draft Local Plan in respect of Land at Showfields Road and Rowan Tree Road, Tunbridge Wells (Policy AL/RTW15).
- 1.5 This statement provides responses to the specific questions raised by the Inspector in respect of Matter 11 (Retail, Town Centres and Community Facilities) of the Examination of the Tunbridge Wells Local Plan as set out in the Inspector's Matters, Issues and Questions for Stage 2 – Revised dated 12th April 2022.

2.0 RESPONSE TO MATTER 11 ISSUE 4 (COMMERCIAL AND MIXED USE SITE ALLOCATIONS QUESTIONS 10-13)

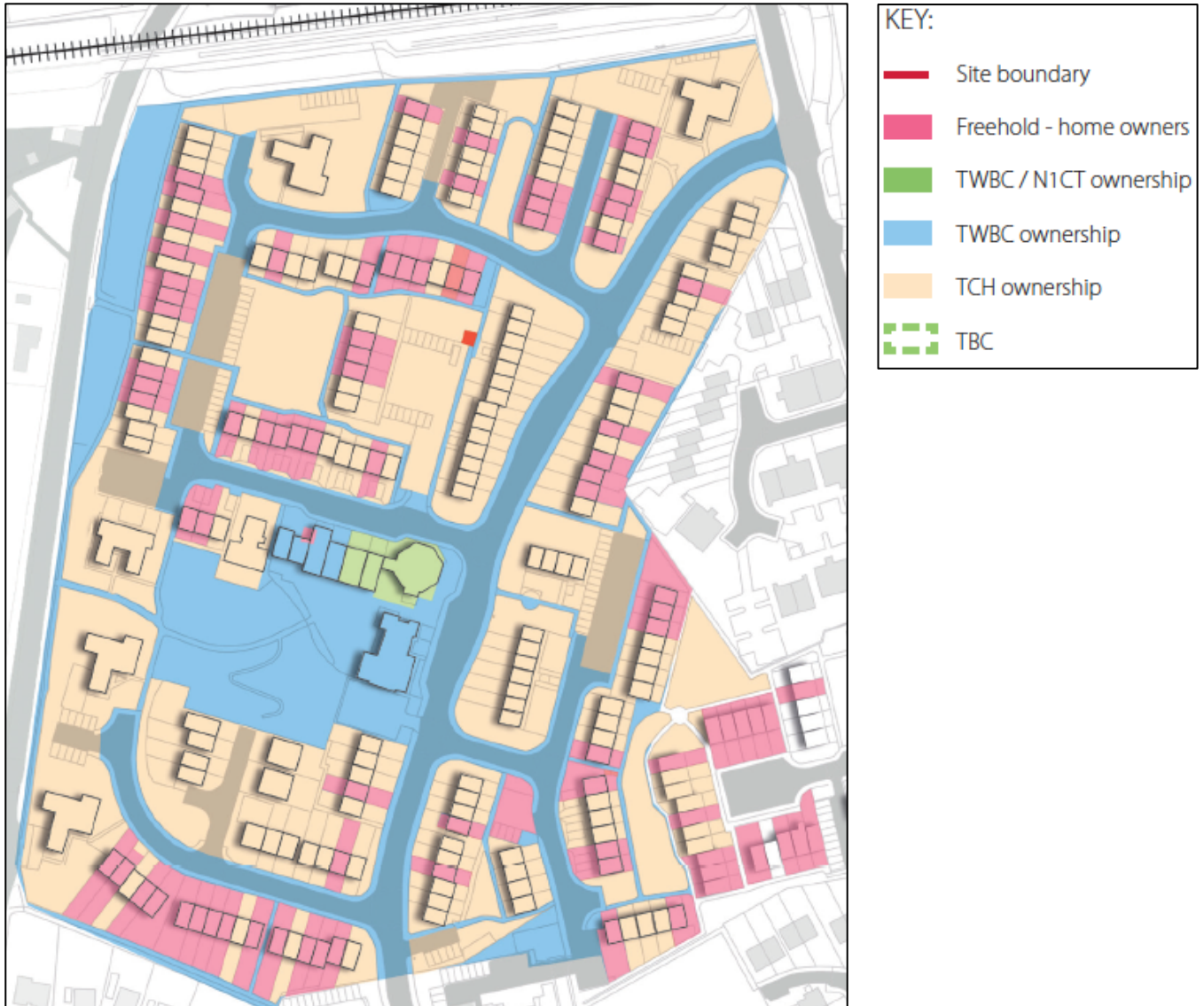
QUESTION 10 – WHAT IS THE JUSTIFICATION FOR THE PROPOSED ALLOCATION AND MIXED OF USE?

- 2.2 The proposed allocation comprises previously developed land at the Showfields Estate. The Showfields Estate is in a highly sustainable location with excellent public transport links and opportunities for walking and cycling. It is well placed for residents to access local shops and services including those in Tunbridge Wells town centre.
- 2.3 TCH support the principle of the proposed allocation and is excited about the potential to create long lasting change for existing and future residents, however TCH do not consider that the allocation can realistically deliver approximately 155 additional dwellings given the identified constraints to development. TCH do not consider that the requirement to provide 155 additional dwellings has been justified and the Council have not carried out any independent analysis to support the number of new units referred to, which is severely constrained by car parking provision, splintered land ownership, the requirement to retain areas of open space and the community facilities and viability.
- 2.4 TCH has identified that the physical condition of the apartment blocks and houses on the Showfields Estate is of concern and the useable life of the buildings is limited without significant intervention and investment. The estate was built using the Llewellyn system of timber frame construction. The flats have significant fire performance issues, both in terms of structure and layout. The common parts within the apartment blocks are dated and uninviting and there is a single means of escape. The flat roofs all are life expired and need full renewal and redesign to incorporate insulation to current building regulations. The walls are uninsulated and the main elevations cannot be insulated due to the timber frame. Whilst temporary works have been carried out to ensure compliance with fire safety regulations in the short term, the only way to rectify the existing problems and to meet current requirements is via redevelopment.
- 2.5 TCH has engaged with both the Council and Kent County Council through the pre-application process since October 2020 and on 23rd May 2022 submitted a full planning application for:
- "Demolition of existing residential units and existing garages and construction of 146 new residential units (Use Class C3) with associated vehicular and pedestrian access, car parking, cycle parking, refuse storage and other associated works including servicing and landscaping, works to public highway, public realm improvements and a new sub-station"*
- 2.6 TCH's proposals result in the provision of 36 net additional dwellings. The Inspector should note that this application pertains to land within the control of TCH with some minor buy-backs (refer to Appendix 1 for planning application site boundary). It does not include land used for the community uses (community centre, library and medical centre) which are owned by the Council and No.1 Community Trust.

2.7 TCH consider that the 155 additional units stated in the allocation is not achievable for the following reasons:

a. Ownership

2.8 The Showfields Estate is in multiple ownership as shown on the plan below.



2.9 TCH is fully committed to working with the Council and other landowners to advance the redevelopment and regeneration of the Showfields Estate. However, there is an urgency for TCH to redevelop its failing apartment blocks and despite pre-application discussions over 2 years, it remains unclear whether the redevelopment of the community buildings is financially viable and how any redevelopment would be funded. It is also understood that there is no longer a requirement for a health centre on the estate.

2.10 As a result, TCH's proposals focus on land where development can be delivered. TCH's proposals cover land which is majority owned by TCH, although TCH is in the process of negotiating and buying-back several long-leasehold interests within the existing apartment blocks and a number of houses from owners who acquired their properties under the Right to Buy scheme. The scheme also includes strips of land and highways owned by the Council and Kent County Council (KCC).

- 2.11 The community buildings on the estate are owned by Number 1 Community Trust (N1CT) and the Council. TCH commenced discussions with N1CT in January 2021. N1CT fully engaged in these discussions, however N1CT advised that sourcing funding for the redevelopment of the community buildings was challenging and N1CT recommended that TCH progress an independent planning application.
- 2.12 A high proportion of the houses on the estate have been purchased by individual occupiers under the Right to Buy scheme. It is not feasible for TCH to acquire all of these properties and for a significant number of residents to lose their homes.

b. Building Heights

- 2.13 Given the character of the surrounding area and prevailing building heights, as well as the nearby Conservation Area, it is not considered that taller buildings would be appropriate for the Showfields Estate.

c. Trees including those protected by TPOs

- 2.14 A tree survey was carried out across the estate in November 2020 and recorded 89 trees, 2 groups of trees and 7 hedges. TCH's proposals result in the removal of 21 trees identified as Category B and C trees. No TPO or Category A trees will be removed.
- 2.15 Whilst it is regrettable that TCH's development will result in the loss of a number of existing trees, this loss is made in order to ensure that the site can be developed as efficiently as possible. The retention of additional trees would result in the delivery of even fewer units. The loss of the existing trees will be compensated for by the replacement planting of approximately 130 new trees.

d. Open Spaces including the 'Village Green'

- 2.16 TCH's proposals do not encroach or impact on the area of land which is protected as a designated Village Green on the estate.
- 2.17 TCH's proposals will result in a slight loss of open space (203 sqm) within an existing area of open space known as the Willow Tree Community Garden, which is currently an area of grass with limited ecological value with no planting.

e. Car Parking

- 2.18 The provision of car parking on the estate has been discussed in detail during pre-application discussions with the Council and KCC.
- 2.19 Car parking on the estate is unallocated. As a result, the estate currently experiences indiscriminate parking, some of which causes compromises visibility and highways safety and restricts the manoeuvrability of refuse and other vehicles.
- 2.20 During pre-application discussions it was agreed with TWBC and KCC that any redevelopment should not adversely affect the parking arrangements for existing dwellings and that parking provision for new/replacement dwellings should be provided to meet standards.

- 2.21 The site's classification¹ as either 'Edge of Centre' or 'Suburban' is not clear. During pre-application discussions, it was agreed that a relaxation from Suburban standards would be acceptable, although this was not quantified by either KCC or the Council.
- 2.22 The proposals put forward within TCH's planning application include a number of infrastructure changes which seek to improve the overall parking provision across the estate. These improvements relate not only to the number of parking spaces, but the quality of provision and seek to address the existing issues of indiscriminate parking which the site currently experiences.

f. Provision of Existing Services

- 2.23 There is a significant number of above and below ground services located on the site, which is a constraint to development.

g. No net loss of affordable

- 2.24 In accordance with Policy H4 of the Plan, TCH's planning application seeks to ensure 'no net loss' of affordable housing. This is an important commitment for TCH as a provider of affordable housing.

h. Viability

- 2.25 TCH's planning application is accompanied by a viability assessment which concludes that the proposed development is unviable with a deficit of over £7 million without taking into account the additional costs associated with a decant programme.
- 2.26 The scheme is not viable and would not be attractive to a commercial developer or housebuilder. However, as a Registered Provider of affordable housing and with a long term interest in the Showfields estate, TCH have made the decision to deliver the scheme. This reflects TCH's long term investment in the estate's assets, the need to provide good quality affordable housing and to deliver wider social and regenerative benefits.
- 2.27 The lack of grant funding accentuates the viability challenges for the scheme. At present, grant funding is only available for new units of affordable housing and not replacement affordable units.
- 2.28 For the reasons outlined above, TCH consider that the requirement to provide 155 additional dwellings has not been justified, whilst taking into account the key objectives and requirements of the allocation itself, and that the wording of the policy should be amended to refer to a lower number of new dwellings.

QUESTION 11 – IS THE ALLOCATION DEVELOPABLE WITHIN THE PLAN PERIOD?

- 2.29 For the reasons set out above, it is not considered that the allocation as currently worded is deliverable within the plan period.

QUESTION 12 – HOW HAS EXISTING ON-SITE WASTEWATER INFRASTRUCTURE BEEN CONSIDERED? IS THE ALLOCATION DELIVERABLE?

¹ Parking Standards are set out in KCC's Design Guide Reviews: Interim Guidance Note 3 Residential Parking (November 2008)
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- 2.30 TCH's proposals for the site take into account the wastewater infrastructure requirements.
- 2.31 It is proposed that all surface water flows will be managed and controlled on site, with a reduced discharge rate to the public water sewer network. Each area of development will utilise below ground attenuation with a restricted discharge to the surface water sewers reducing flood risk.
- 2.32 New below ground gravity drainage has been designed to serve the new development and will communicate with the existing adopted foul and surface water sewer network running through the wider Showfields Estate development either directly to the public sewer network, or indirectly via the existing private drainage network already in place. All new connections will be subject to discussion with and approval from Southern Water via Section 106 connection applications, which will be made at an appropriate time.
- 2.33 The below ground surface water drainage has been designed to current best practice guidelines / Kent County Council as Lead Local Flood Authority current requirements, to cater for all storm events up to and including the 1 in 100 year storm event plus an allowance for 40% Climate Change.

QUESTION 13 – WHAT IMPACT WILL THE PROPOSED ALLOCATION HAVE ON EXISTING COMMUNITY FACILITIES AND HOW WILL THE POLICY PROVIDE FOR THE EFFECTIVE ENHANCEMENT AND IMPROVEMENT OF FACILITIES

- 2.34 TCH fully support the community facilities on the estate. TCH recognise that the existing facilities provide important spaces for residents and are an integral part of the community on the estate.
- 2.35 TCH makes a significant investment in the estate annually. In 2021, TCH contributed over £30,000 of funding towards specific projects including projects for youth activities and events, mentoring support for the manager of N1CT, English conversation classes, replacement glass for the community centre doors and café windows, a Halloween party, funding towards a therapist to support children's mental health and upgrades to the fixtures in the café. TCH intend to continue a programme of community investment at the Showfields Estate.
- 2.36 TCH believe that the proposals put forward within their planning application will act a catalyst for regeneration, and additional residents on the estate will help to support and sustain these important existing community uses in the long term, contributing to the vitality and viability of the Showfields Neighbourhood Centre.
- 2.37 Whilst TCH do not have any control over the community buildings, TCH will continue to support and work with the Council and N1CT to support any future plans for the community buildings.
- 2.38 Any future redevelopment proposals for the community buildings must provide temporary spaces during construction to ensure continuity.

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