

**Tunbridge Wells Borough Local Plan**  
**Hearing Statement by Dr Philip Whitbourn, OBE**

My name is Philip Whitbourn. Now retired, I have been a resident in Royal Tunbridge Wells for upwards of sixty years, and have taken an interest in Local Plans for the town throughout that time. I have a PhD degree in Town Planning, and am a retired Fellow of the Royal Town Planning Institute.

I went to some trouble to study the Council's Pre-Submission Local Plan Consultation and, in May 2021, made seven representations upon it, which are summarised in the attached Document A. The full Representations themselves were submitted on the proper forms in accordance with the time table laid down, and I am concerned that they should be taken seriously, both by the Council and the Inspector.

In February 2022, I sought to clarify whether the Plan had been amended in any way, in response to my Representations, and if not, the reasoning for declining to do so. The Council's position in relation to this is set out in the letter dated 16<sup>th</sup> March 2022 attached as Document B.

**Representation 1**

So far as I can see, Document B makes no reference to Representations 1 and 2. Representation 1 makes the point that Royal Tunbridge Wells and Southborough are two very different towns, Royal Tunbridge Wells being a regional shopping centre, and a historic tourist destination town in a way that Southborough, with its more local shopping centre and functions, is not. Thus, it makes no sense for these two very different places to share the same "Local Ambitions" in their visions for the future, under the plan. In particular "Local Ambitions" for Royal Tunbridge Wells should, in my view, be much more aspirational, as I have suggested, and I ask that serious consideration be given to this point, with suitable amendments made to the plan.

**Representation 2**

The Pantiles is generally acknowledged to be "the jewel in the town" of Royal Tunbridge Wells, and I have been dismayed that such an out of scale and out of character development has been permitted on the former Union Square site at its southern end. Paragraph 5.14 seems to me to be rather much of an open invitation to like minded developers to come up with more of the same within the historic town centre and Conservation Area, and I am asking that the paragraph should be reconsidered.

**Representation 3**

Document B makes clear that Policy STR/Rtw1 has been amended in response to my Representation by the additional references to Policies EN4 and EN5, and I am grateful for that. However, the wording of the text itself has not changed, and I ask that serious consideration be given to the changes I have suggested.

**Representation 4**

Somewhat similar comments apply to Representation 4 as those just made on Representation 3. My concern here is that the emphasis should not just be upon "new" development, which may be damaging in conservation terms, as it is adjoining The Pantiles, but reference should also be made to refurbishment, which can be highly desirable both from a conservation point of view and of providing well located housing. Again, I ask that due consideration is made to possible improvement in the wording of the text.

### **Representations 5 and 6**

I feel very strongly that the word **redevelopment** should not feature in the Plan in the way that it currently does. A dictionary definition of a Redevelopment Area is "an urban area in which all or most of the buildings are demolished and rebuilt". This should certainly not apply to the statutorily listed Civic Complex. Current Council policy is to **re-purpose** those parts of the listed Town Hall that have become surplus to the Council's current requirements. Depending how it is done, this seems an eminently sensible and desirable policy that should be supported, and the wording in the Local Plan should be amended to accord with this.

Also, I am strongly against the redevelopment of Great Hall Car Park, which has been the subject of local controversy before. As a car park, it is well located, it is important to the operation of the BBC and businesses in the area, it is convenient for visitors to Calverley Grounds, and it can at times be useful to railway travellers. As a building, it is relatively low and thus not too obtrusive from Calverley Grounds, its arched treatment is agreeable visually, and architecturally it accords with its parent building, the Great Hall itself. Redevelopment would almost certainly harm the Conservation Area, and I ask that all reference to the redevelopment of Great Hall Car Park should be removed from the Plan.

### **Representation 7**

Although Policies EN4 and EN5 have been added to the list beneath STR/RTW2 as well as to STR/RTW1 in response to my representations, again there has been no change in the actual text, and I ask that serious consideration be given to amending the text along the lines I have suggested.



**A**

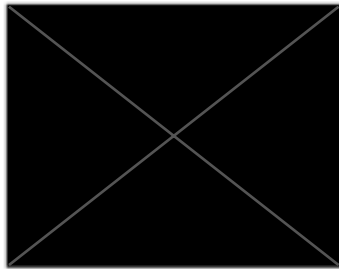
# REPRESENTATIONS

on Tunbridge Wells Borough Pre-Submission

## LOCAL PLAN

Rep No.	Subject	Policy/ Para	Plan Page	Evidence Page
1.	To be sound, the Plan needs separate and worthwhile "Local Ambitions" for the historic town and regional centre of Royal Tunbridge Wells	3.13	31	1-3
2.	The need to avoid repetition of the appalling planning mistakes, in visual and conservation terms, of the Dandara and Cinema site schemes	5.14	75	8/17
3.	The need for a more enlightened strategy for the historic town and regional centre of Royal Tunbridge Wells	STR/RTW 1	76/7	All
4.	In considering the provision of additional housing in the town centre, the Plan should focus on the contribution that the sympathetic refurbishment of vacant properties can make, and not just on new build	5.25	79	8/9
5.	"Redevelopment" of the landmark, listed Civic Complex, and Great Hall car park unsound in conservation area terms	5.28	79/80	10/11 16
6.	The word "redevelopment" should be omitted. And "public art" needs to be suitable, not a public eyesore, as at the Dandara scheme	5.30	80	15
7.	Vision for Town Centre, public realm, and Plan's unsound framework for the all-important Town Centre Area Plan	STR/RTW 2	81/2	1-3 18-20 4-15

**Dr Philip Whitbourn, OBE,**  
May, 2021

**B**

Date: 16 March 2022

Dear Dr Whitbourn

Thank you for your letter dated 4 February 2022 and for taking the time to respond to our Local Plan consultation in May 2021. I apologise for the delay in responding and will respond to the points raised in your letter below.

The Borough Council have not responded to any individuals on the representations made at this stage of the consultation process. However, all comments have been considered and an initial response has been set out in the Consultation Statement. I have enclosed relevant sections of the Consultation Statement for your information. All representations as well as the Consultation Statement have been forwarded to the Independent Planning Inspector who has been appointed by the Secretary of State to lead the Local Plan Examination.

I note that your representations relate to Policies STR/RTW1: The Strategy for Royal Tunbridge Wells and STR/RTW2: The Strategy for Royal Tunbridge Wells Town Centre. Specifically, that Policy STR/RTW1 places too much emphasis on redevelopment and intensification which could be harmful to the conservation area, and in response



to STR/RTW2 the redevelopment of the Listed civic complex and the Great Hall Car Park is unsound in Conservation Area terms.

Both these policies set out requirements for respecting the town's important character and respecting and enhancing the town centre's distinct heritage and cultural assets. Below each of these policies cross reference is made via a list of other Local Plan policies of particular relevance. These include STR 8: Conserving and Enhancing the Natural, Built and Historic Environment. In response to your comments policies EN4: Historic Environment and EN5: Heritage Assets have been added to the lists beneath both STR/RTW1: The Strategy for Royal Tunbridge Wells and STR/RTW2: The Strategy for Royal Tunbridge Wells Town Centre.

Policy EN4 requires that all new development shall contribute to the overall conservation and, where possible, enhancement of the historic environment of the borough. Policy EN5 protects both designated and non-designated heritage assets and their settings. This includes Listed Buildings like the Civic Centre.

Policy STR/RW 2 also sets out a framework for the provision of a Royal Tunbridge Wells Town Centre Plan which will provide a vision for the future of the Town Centre including opportunities for the enhancement of culture and heritage, which may include provision for suitable public art where appropriate.

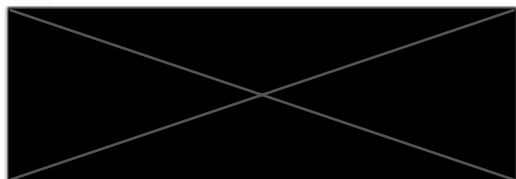
Having carefully reviewed your submitted comments to the Regulation 19 consultation, it was not considered necessary to make any changes to the policies themselves. It was considered that the policies as currently worded, when cross-referenced with Policies EN 4: Historic Environment

and EN 5: Heritage Assets, as well as other policies in the Plan, that this would ensure protection or enhancement of the historic environment of the Town Centre.

One of the strategic objectives of the new Local Plan is to conserve and enhance the valued historic built and natural environments of the borough. As a whole the policies in the Plan ensure that the delivery of new development will be balanced against the character and diversity of the historic and cultural environment of the borough, including Royal Tunbridge Wells Town Centre.

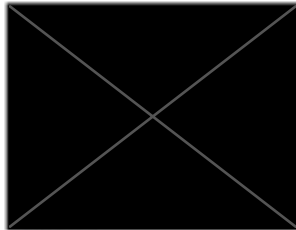
To reconfirm the information set out in our holding letter of 10 February 2022, it is noted that you wish to attend the Local Plan examination hearing sessions and that you have already been in touch with the Local Plan Programme Officer about this.

The hearing sessions for Policies STR/RTW1: The Strategy for Royal Tunbridge Wells and STR/RTW2: The Strategy for Royal Tunbridge Wells Town Centre are currently scheduled to commence on **Tuesday 19 April 2022 (Week 4)**, with a deadline of **8 April 2022** for the submission of hearing statements to the Planning Inspector (via the Programme Officer).



Steve Baughen  
Head of Planning





Date: 10 February 2022

Dear Dr Whitbourn

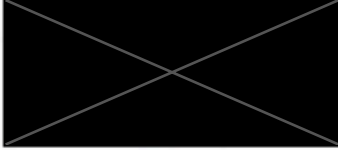
I am writing to confirm receipt of your letter of 4 February 2022.

We are currently looking into the comments raised and will get back to you within the next 10 working days.

It is noted that you wish to attend the Local Plan examination hearing sessions and that you have already been in touch with the Local Plan Programme Officer about this.

Also, your comments mainly relate to Submission Local Plan Policies STR/RTW1: The Strategy for Royal Tunbridge Wells and AL/RTW2: The Strategy for Royal Tunbridge Wells Town Centre, the hearing sessions for which commence on **Tuesday 19 April 2022 (Week 4)**, with a deadline of **8 April 2022** for the submission of hearing statements to the Planning Inspectorate (via the Programme Officer).

Yours sincerely



PP  
Nichola Watters  
Planning Policy Manager

Tunbridge Wells Borough Council  
Town Hall  
Mount Pleasant  
Tunbridge Wells  
TN1 1RS  
01892 518620



# REPRESENTATIONS

on Tunbridge Wells Borough Pre-Submission

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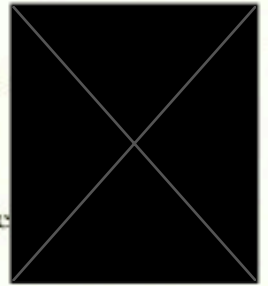
**Dr Philip Whitbourn, OBE,**  
May, 2021



**Dr Philip R. Whitbourn O.B.E**  
PhD, FSA, FRIBA, FRTPI (Rtd)

14<sup>th</sup> March 2022

Te



Nichola Watters  
Planning Policy Manager  
Tunbridge Wells Borough Council  
Town Hall, Tunbridge Wells, TN1 1RS

Dear Nichola Watters

### **Tunbridge Wells Borough Local Planning**

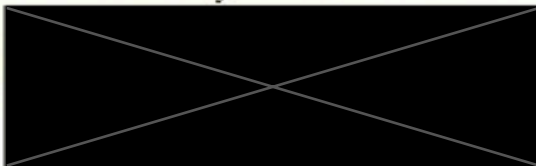
On 10<sup>th</sup> February you sent me the enclosed letter, saying that you would get back to me within the next 10 working days, regarding my comments on the Local Plan. A month has now elapsed since then, during which time I have heard nothing further from you.

I do, of course, wish to take full account of the contents of this awaited further letter before preparing my Hearing Statement, and I am becoming increasingly concerned that time is running short before the deadline of 8<sup>th</sup> April.

I shall be glad therefore, if you will ensure that this belated further letter from you is forthcoming without further delay, in order to enable me to give its contents proper consideration when preparing my Hearing Statement to the Planning Inspectorate.

I am sending a copy of this letter to the Programme Officer, Charlotte Glancy, for her information, and look forward to an early response from you.

Yours sincerely



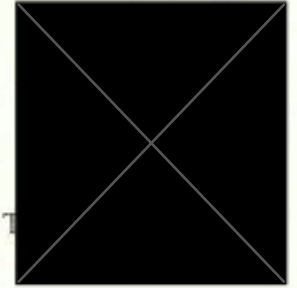




Dr Philip R. Whitbourn O.B.E  
PhD, FSA, FRIBA, FRTPI (Rtd)

COPY

4<sup>th</sup> February 2022



Head of Planning  
Tunbridge Wells Borough Council Planning Services  
Town Hall  
Tunbridge Wells, Kent, TN1 1RS

Dear Sir

### **Tunbridge Wells Borough Local Plan**

In May 2021 I went to some trouble to make a considered response to the Local Plan, and duly submitted seven representations on the appropriate forms in accordance with the time table laid down. The representations are summarized on the enclosed sheet that was submitted with the forms, upon which I confirmed my wish to participate in the Hearing Sessions.

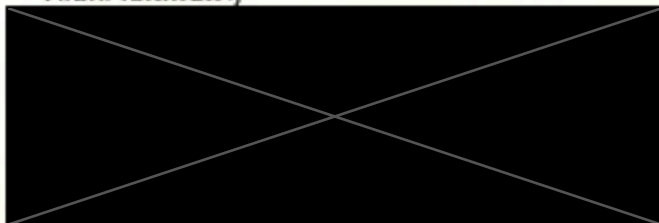
I have received no reaction from the Council to these representations, other than the formal notice that the Independent Examination of the Plan will start on 1<sup>st</sup> March, and will continue at various dates thereafter.

Unfortunately, I am visually impaired, suffering from macular problems, and I thus need to work from hard copy that I can read under a desk-top video magnifier. In connection with the forthcoming hearing therefore, I shall be glad if you will provide me with a letter that I can read in this way, answering the following three straightforward questions:

- 1. Has the Local Plan been amended in any way in response to my representations?**
- 2. If it has, please will you set out clearly any such changes that may have been made?**
- 3. If it has not, please will you set out cogently any reasoning for declining to make such changes?**

An early reply would be appreciated, in view of the imminent Hearing.

Yours faithfully



Copy to: The independent Programme Officer  
C/O Banks Solutions, 80 Lavinia Way,  
East Preston, West Sussex, BN16 1DD