

# **Hearing Statement to Tunbridge Wells Draft Local Plan: Examination 12<sup>th</sup> July 2022**

## **Matters, Issues & Questions for Stage 2 Matter 11, Issue 4, Questions 10 and 13 Land at Rowan Tree Road, Showfields**

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Examination 12<sup>th</sup> July 2022**

**Matters, Issues & Questions for Stage 2**

**Matter 11, Issue 4, Questions 10 and 13**

**Land at Rowan Tree Road, Showfields**

**Client: Number One Community Trust**

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## 1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Evolution Town Planning Ltd, on behalf of The Number One Community Trust (NOCT), to respond to Matters, Issues and Questions (MIQs) raised for Stage 2 of the Examination into the Tunbridge Wells Local Plan.
- 1.2 This Statement focuses on matters raised by the NOCT, expanding upon our representations already submitted as part of the Regulation 19 Consultation. We provide a response to the question of most relevance to the Trust, questions 10 and 13 of Matter 11.
- 1.3 This statement will avoid unnecessary repetition, but will cross refer to our earlier representations in answering the relevant questions set in relation to Matter 11.
- 1.4 This statement focuses on Matter 11, Issue 4 and in particular questions 10 and 13. Matter 11 relates to Retail, Town Centres and Community Facilities, with issue 4 focusing on 'Commercial and Mixed-Use Site Allocations'. Questions 10 to 13 relate to '*AL/RTW15 – Land at Showfields Road and Rowan Tree Road*', which includes land owned by the Number One Community Trust (as set out at paragraphs 1.6 to 1.20 of our Regulation 19 submission, dated May 2021). Questions 10 and 13 are particularly relevant to the Trust, and we provide our response to these questions at section 2.

## 2.0 Response to Matter 11 Issue 4 - Commercial and Mixed-Use Site Allocations

### Q. 10 What is the justification for the proposed allocation and mixed of uses?

2.1 The NOCT has previously questioned the mix of uses proposed under this policy. In particular, whilst the Trust welcomes investment in the wider estate of Showfields, the Trust have been concerned Policy **AL/RTW15**. In particular the NOCT has concerns about the scale of the residential development proposed and the vagueness of the wording in relation to the community uses included as part of the 'mix of uses'. The policy currently starts:

*'This site, as defined on the Royal Tunbridge Wells and Southborough Policies Map (Inset Maps 1a-1d and 2), is allocated for residential development providing approximately **155 additional dwellings and health and community uses**'.*

2.2 As previously stated, given the relatively small area being allocated and the predominance of existing residential uses in the area allocated, **155 additional units** is a substantial increase – without any undeveloped or non-residential land actually allocated. Given that this part of Tunbridge wells is already an area which is predominantly flats and maisonettes, some of which are in private ownership, an **additional 155** new homes will lead to a very high residential density in this area, which is far in excess of all neighbouring residential densities – especially since no new non-residential land is included. The Number One Community Trust remains concerned about this and is not convinced that this level of additional housing, in this location, is either justified or possible. The NOCT is not opposed to some appropriate residential development, but there is concern that such a high level of intensification of residential uses in close proximity to its premises, could lead to increased pressure on limited car parking spaces, road safety concerns and potential conflict between the community activities at the centre and any new residential uses.

2.3 The NOCT agree that there is justification for including 'new health uses' within this policy. The local community has been disappointed by the closure of the GP surgery on the estate and it would be widely welcomed if a replacement GP surgery could be provided as part of any new development. We support the inclusion of 'new health uses' within this policy.

2.4 As the primary provided of community uses on the Showfield's estate, the NOCT are supportive of any proposals for investment in community provision. The NOCT are currently focused on improving their existing facilities by way of modernisation and refurbishment and would welcome inward investment via direct S106 contributions to assist the Trust in achieving this. Any scheme to deliver new or replacement community facilities would need to be delivered in full partnership with the NOCT, ensuring that the Trust's buildings retain their prime street frontage position and that any replacement was a genuine improvement – quantitatively and qualitatively. Comprehensive redevelopment schemes have been tried elsewhere in Tunbridge Wells and have not been successful (e.g. the TN2 Community Centre on Sherwood). As such, the NOCT would recommend that the policy is reworded to support the 'protection, refurbishment and enhancement' of the existing facilities.

**Q13. 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?**

2.5 Without clear proposals for a redevelopment scheme, it is difficult to assess exact impacts on the community facilities of this policy. However, there is concern that the policy is encouraging an inappropriate level of residential intensification which could lead to negative impacts. Likewise, any redevelopment of the community facilities themselves would need to be carefully managed (and the policy appropriately worded) to ensure the protection of community uses during construction and operational phases.

Intensification of residential uses

2.6 As set out under question 10, the NOCT have been concerned about the potential for high density residential intensification in and around their facilities. With 155 additional residential units, and no indication of where these may be delivered, there is concern the policy offers no protection to the community uses and that it could have a negative impact on the freedom the Trust currently have to operate their premises. In particular, 155 new units in the area could lead to the following negative impacts on the Trust's facilities:

- Whilst the NOCT is not opposed to some residential development, any residential uses delivered within the vicinity of the community facilities need to ensure that the trust's activities can continue (during and after

construction) without restrictions being added or limitations on the Trust's continued activities.

- New residents using the Trust's parking spaces. Parking is already pressured on Showfields Road, and the NOCT have found that some residents frequently park in the Trusts car park. New residential units will only add to this pressure – leading to increased conflict over the Trust's car park and added expense for the Trust in enforcing unauthorized parking.
- The NOCT hosts a pre-school and there are concerns that new residential units, without any road traffic calming measures or speed limit reductions, would pose a threat to road safety for the Trust's users.

2.7 We consider that the policy, as currently worded, focuses on the intensification of residential uses, without adequately offering protection to the existing community uses.

Provision of 'enhanced and improved community facilities'

2.8 The Trustees are not clear as to how this policy will achieve the aim of 'enhancing and improving' their community facilities, and the trustees are concerned that the policy could result in negative impacts for the community, were the community centre itself to be comprehensively redeveloped. The NOCT would welcome inward investment into the community facilities they operate, however, there are reservations about the management of such a proposal.

2.9 The policy currently states:

*'Development on the site shall accord with the following requirements:*

*1. A comprehensive redevelopment of the site to include the re-provision and enhancement of the existing residential dwellings **alongside enhanced and improved community facilities**, to include a new medical centre. The community and health facilities to be provided in accordance with an agreed timetable, relative to the phasing of the residential element of the development;'*

2.10 As currently worded, the NOCT cannot support this policy, since it does not adequately protect the flexibility of the community facilities or make clear what 'enhanced or

improved' community facilities will mean. We consider that more thought needs to be given to how this policy can genuinely 'protect, enhance and improve' the existing community facilities owned and operated by the Trust. The policy needs to address the protection of the NOCT's facilities both in the short term (during any construction work) and in the long term (post development).

#### Construction Phases

- 2.11 Community facilities not only provide physical infrastructure, but provide for the 'soft infrastructure' which enable communities to thrive. The groups and activities which operate in the Trust's buildings would need to be protected and provided for during any construction process. Closing down a centre entirely during construction would risk permanently losing many of the community groups and activities which occupy the Trust's premises. Therefore, the policy needs to include adequate protection for the community groups using the centre, so that they can be provided for in temporary accommodation on site, during construction.

#### Operational Phases

- 2.12 Any redevelopment of the NOCT's facilities would need to ensure that replacement facilities were genuinely improved (quantitatively and qualitatively) and that the community facilities were not compromised in the interest of maximising the residential development opportunity. In particular the Trust would be keen to ensure:
- 2.13 Any replacement community provision offered a genuine improvement on the existing offer (quantitatively and qualitatively).
- The community facilities would need to be enabled to continue to operate in an unrestricted manner.
  - Any new development would need to provide sufficient parking for the community uses to operate successfully.
  - The community facility would need to retain its prime street frontage location.
  - The community facilities would need to retain their connection to the protected village green.
- 2.14 The NOCT would welcome the policy being reworded to ensure the protection of its facilities during any redevelopment and following the completion of the redevelopment.



2.15 The NOCT would also welcome the policy being reworded to require investment in the existing premises, via S106 contributions – made payable directly to the NOCT. This could assist with the NOCT’s own refurbishment program and would be a genuine benefit to the existing community facilities.

### **3.0 Modifications & Conclusions**

- 3.1 We previously set out our suggested modifications to the policy at section 3 of our regulation 19 representations, and we consider that these modifications should still be considered. If these additions had been included in the proposed policy, the Number One Community would have been willing to support the policy.