

Examination of the Tunbridge Wells Borough Local Plan

Tunbridge Wells Borough Council Note Requested by the Inspector

**Local Plan Examination Note for
Inspector in response to Action Point 15
regarding Policy AL/CRS 6: Land south
of The Street, Sissinghurst**

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Contents

1..0 Introduction3

2.0 Background to the allocation of a replacement community hall3

3.0 Viability4

4.0 Way forward.....5

1..0 Introduction

- 1.1 During the Hearing Sessions on the Tunbridge Wells Borough Local Plan, the Inspector asked the Council to prepare a number of Notes on “Action Points”, essentially to clarify its position on certain matters that were discussed.
- 1.2 This Note responds to Action Point 15 relating to Matter 7, Issue 7 Cranbrook & Sissinghurst, specifically Policy AL/CRS 6 Land south of The Street, Sissinghurst. It follows the hearing session held on Thursday 23rd June 2022, at which the Inspector raised a number of queries relating to Policy AL/CRS 6, requiring the Council to reconsider and conclude whether this policy remains appropriate given apparent viability issues for delivering both affordable housing and a replacement community hall. The Council was requested to undertake a further assessment and balancing exercise to include an assessment of the public benefit of providing affordable housing versus providing a replacement community hall. Based on this work, the Council should consider whether to propose a modification to the policy or the deletion of the policy.
- 1.3 The Council’s further consideration is set out below, firstly reviewing the background to the allocation for a replacement community hall and then providing the latest information in relation to viability, before outlining how the Council proposes to modify the allocation.

2.0 Background to the allocation of a replacement community hall

- 2.1 Policy AL/CRS 6 Land south of The Street, Sissinghurst provides for a mixed-use scheme, including residential development providing approximately 20 dwellings, of which 30 percent shall be affordable housing, and a replacement community hall.
- 2.2 The reference to a “replacement community hall” relates to the existing St George’s Institute building, also referred to as the Sissinghurst Village Hall, which occupies part of the proposed allocation site. The hall provides accommodation for a range of community activities. Together with a small area of hardstanding/parking area

immediately in front of it, the hall is owned and managed by a charitable trust, the 'St. George's Institute'.

- 2.3 The St George's Institute is presently in a poor state of repair and requires significant improvements or replacement to continue its function. This is recognised in the Council's Infrastructure Delivery Plan [[CD 3.142](#)] at Table 14: Sport and recreation provision needs for settlements within Tunbridge Wells borough, which identifies a requirement for *improvements to, or replacement of, St George's Hall, Sissinghurst*¹.
- 2.4 The proposed Local Plan allocation seeks to support the continuation of this community facility. Importantly, it is sited in a very sustainable location at the centre of Sissinghurst adjacent to The Street, the main road running through the village. It can be easily and safely accessed by pedestrians and, although on-site parking provision is limited, there are opportunities for on-street parking within close proximity of the hall. Furthermore, there were only a relatively small number of sites submitted to the Call for Sites within the environs of Sissinghurst Village and none were as well located for a community building.
- 2.5 The whole site is not needed for a replacement community hall; hence, there is the opportunity for a mixed-use allocation that also provides for residential development on this brownfield site.

3.0 Viability

- 2.6 There is a live (currently undetermined) planning application 21/03914/FULL, submitted on 23 November 2021, for: *Demolition of the existing St George's Institute building and erection of a new building providing community facilities, community parking spaces, improved access arrangements, 19 dwellings and associated landscaping and infrastructure.*
- 2.7 Of particular relevance to the proposed allocation is the fact that the application does not propose to include the delivery of affordable housing. The site promoter

¹ This requirement is referring to the St. George's Institute building.

was aware from pre-application discussions with Council officers of the emerging policy and that a viability assessment would be required to support a scheme that did not meet its expectations. Hence, a viability assessment has been prepared by the site promoters as part of the current planning application, which supports their case for the proposed non-delivery of on-site affordable housing.

- 2.8 This viability assessment has since been reviewed by the Dixon Searle Partnership (DSP), the Council's consultants which also carried out the Local Plan viability assessments. They have confirmed that the scheme would not be viable if the full costs of the replacement hall and affordable housing have to be met. The DSP assessment is publicly available as a document in relation to the planning application. In essence, it accepts that the full requirement for affordable housing is not likely to be viable, in addition to the community hall costs, although the contribution towards affordable housing will depend on the extent of other s106 payments, and the costs associated with the construction of the replacement hall. DSP also recommend that the Council may also wish to consider the requirement for a review mechanism in order to capture any future improvement in viability.

4.0 Way forward

- 2.9 Given that the current planning application remains undetermined and that the level of affordable housing that could be achieved (assuming that the village hall continues to be prioritised) is uncertain but is very unlikely to achieve the 30% requirement of the SLP policy, it is therefore considered necessary to amend the policy in some way in order for it to be achievable.
- 2.10 The argument for requiring a replacement community hall is set out above – it is needed, the site is the most appropriate, and it is deliverable through enabling adjacent housing.
- 2.11 In terms of the potential lesser contribution of affordable housing as a consequence, the Council has noted that there have been other planning approvals granted within Sissinghurst over recent years that have delivered affordable housing, as listed below:

- Land off Common Road, Sissinghurst. Planning application 14/502645/O for the development of up to 65 new homes (including 35% affordable housing) was approved on appeal 21 March 2016, and 17/00451/RM was approved 7 August 2017. The approved scheme to deliver 60 residential dwellings, that is now built out, includes the delivery of 21 affordable units.
- Land at the corner of Frittenden Road and Common Road, Sissinghurst. Planning application 19/03625/O for the erection of up to 18 residential dwellings was approved 10 March 2021, and 21/03126/RM for 18 dwellings was approved 21 January 2022. This site is allocated by Policy AL/CRS 7 in the TWBC Submission Local Plan for approximately 18 dwellings, of which 40 percent shall be affordable housing. The approved scheme includes the delivery of 8 affordable units (representing a rate of 40%).

- 4.1 Therefore, the overall balance of planning considerations clearly favours securing the community hall and achieving the maximum level of affordable housing as is viable (the general principle of which is already reflected in Policy H 6).
- 4.2 To delete the allocation completely is not favoured, as it would not provide the clarity of approach that is sought through the statutory Local Plan. This is regarded as important for the local community, aside from promoting effective use of a brownfield site.
- 4.3 Given the current circumstances in respect of the viability assessments carried out in relation to the current planning application, some modification to the policy is accepted as necessary. An updated Sustainability Appraisal will be formally undertaken by the Council, but given the public benefits arising from delivery of a replacement community hall in a sustainable location, compared to the delivery of affordable housing within the context of a relatively high level of affordable housing having been delivered recently to meet the needs of the local population, it is likely to support a modified policy approach to the first paragraph of Policy AL/CRS 6 to read:

“This site, as defined on the Cranbrook and Sissinghurst Policies Map, is allocated for a mixed-use scheme, including the provision of a replacement community hall, and residential development providing approximately 20

dwellings, of which up to 30 percent shall be affordable housing, ~~and the provision of a replacement community hall.~~ “

- 4.4 This may be supported by a modification to the supporting text to Policy AL/CRS 6 (after paragraph 5.339) to provide an overview and explanation of the approach being taken regarding the expected level of affordable housing to be delivered by proposed development, such as:

“Due to the need for, and public benefit of, the new village hall along with its associated cost, it may not be viable to deliver the full requirement for 30% affordable housing. The proportion achievable will be determined through the planning application process, having regard to the most recent viability assessment information”.