

19 March 2024



Tunbridge Wells Borough Council
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Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
FULL PLANNING APPLICATION FOR CHANGE OF USE FROM INDUSTRIAL (CLASS B2) TO INDOOR
TRAMPOLINE PARK (CLASS E(d)) AT BKT SITE, NORTH FARM ROAD, TUNBRIDGE WELLS, TN2 3BW**

We are instructed on behalf of our client Clearbell Capital LLP to submit a full planning application to Tunbridge Wells Borough Council for the change of use of the BKT Site, North Farm Road from a printing business use (Use Class B2) to an indoor trampoline park (Use Class E(d)).

This planning application has been submitted via the Planning Portal (ref: PP-12828243) and comprises the following:

Application Form including Certificates of Ownership
Cover Letter style Planning Statement (including Sequential Town Centre Assessment)
Transport Statement
Renewable Energy Assessment
Architectural drawings, as follows:

Drawing No.	Rev No.	Title	Scale/Size
11655-PL_001	P1	Site Location Plan	1:1250
11655-PL_002	P1	Existing Site Plan	1:500
11655-PL_003	P4	Existing and Proposed Site Plan	1:500
11655-PL_004	P1	Existing Building Plans	1:200
11655-PL_005	P1	Proposed Building Plans	1:200

Proposed Development

Full Planning Permission is sought from Tunbridge Wells Borough Council for the following development:

“Change of use from a printing business (Use Class B2) to an indoor trampoline park (Use Class E(d))”

The planning application has been submitted to enable Air Hop to occupy the site as an indoor trampoline park. Air Hop is a business that successfully operated in Tonbridge between 2016-2021 as the Jump In Trampoline Park which welcomed up to 100,000 visitors per year to the site. The business also operates from a number of other sites in the UK.

The Application Site

The application site comprises a warehouse on the High Brooms Industrial Estate that has been used for a number of years by a commercial printing business. The use is understood to be Use Class B2. The site measures circa 0.55 ha containing a warehouse building and associated external areas of car parking and servicing. The warehouse unit is of steel portal frame construction with brick elevations. The building has a ground floor, first floor, and first floor mezzanine level, which provide a total floorspace of 3,174 sqm GIA. Externally there is currently parking provision for approximately 40 vehicles.

Site Context

The High Brooms Industrial Estate includes local industrial occupiers such as SIG, Brewers and Noble Wines. There are also leisure uses within the estate that have been granted planning permission including the 'Tigers Gymnastics Centre' at Unit 5, Chapman Way (application ref: 20/01310/FULL).

The site is in an accessible location. Royal Tunbridge Wells town centre is located approximately 3.2 km to the south west of the site. The site is circa 0.48 km from the High Brooms station which provides a direct rail link to London. The site is accessible by the A21 which is being upgraded to become a dual carriageway; this will significantly enhance access to the wider region.

Site Designations

The site is subject to the following planning designations:

- Southborough High Brooms Key Employment Area
- Environment Agency Flood Zone 1
- Ashdown Forest 15 Km Habitat Regulation Assessment Zone

Planning History

Savills has undertaken a desktop review of the site's planning history via the Local Planning Authority's online records. The relevant planning history related to the site is set out in the table below and the site has been occupied pursuant to permission 86/01750/FUL for industrial/warehouse uses.

Application Ref.	Description	Decision	Date
86/01750/FUL	Change of use from garage, workshop and warehouse to three industrial/warehouse units	Permission Granted	22 January 1987

Statutory Duties

Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Set out below is the development plan and the other material considerations that are relevant to the proposed development.

Development Plan

The Development Plan for Tunbridge Wells currently comprises the following documents:

- Saved Policies of the Local Plan (2006)
- Core Strategy (2010)
- Site Allocations Local Plan (2016)

The Local Planning Authority is in the process of preparing an emerging local plan that will replace the adopted development plan mentioned above. The emerging Submission Local Plan (2020-2038) is currently at the Examination Stages of preparation, with a target adoption date of late 2024. Due to its advanced stage in the preparation process, the policies within it carry reasonable weight in the determination of the proposed development.

Other Material Considerations

Other relevant material considerations are as follows:

National Planning Policy Framework (NPPF) (December 2023)
National Planning Practice Guidance (NPPG)

Planning Assessment

In the following part of this letter the proposed change of use from industrial (understood to be Use Class B2) to an indoor trampoline park (Use Class E(d)) is assessed against the policies in the development plan as well as other material considerations.

Employment Use

The application site is situated within the High Brooms Industrial Estate, which is recognised under the adopted Local Plan 2006 as an Economic Development Area (adopted Policy ED1), designated as a Key Employment Area (KEA) within adopted Core Policy 7, and reaffirmed as a KEA in the adopted Site Allocations Local Plan 2016. As per these policies the site is considered to be of importance for economic development and employment generation within the region. Policy ED1 specifically supports large-scale B1 light industrial development (500 square meters gross floor space or greater) within Economic Development Areas including in the High Brooms Industrial Estate.

Core Policy 7 outlines the borough's strategy for employment provision, emphasising the maintenance of employment floorspace and encouraging new and redeveloped floor space within KEAs. This policy aims to retain existing employment floor space and promote new developments to meet strategic and local requirements, thereby supporting the economic vitality of designated areas like the High Brooms Industrial Estate. Core Policy 10, underscores the borough-wide commitment to retaining and enhancing employment floor space to encourage economic growth.

It is important to note there are material considerations that dictate less weight is given to these Development Plan policies, specifically the creation of the planning Use Class E which supersedes former Use Class B1 and the policies in the NPPF (December 2023) concerning building a strong, competitive economy.

On 1st September 2020 the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 was introduced to amend the Town and Country Planning (Use Classes) Order 1987. A new class E was created which encompasses commercial, business and services. The former B1 use was incorporated into this Class E use. The creation of the class E use set out clear government support for flexibility in commercial uses to achieve economic objectives.

Paragraphs 85 and 86 of the NPPF (December 2023) emphasise creating conditions for businesses to invest, expand, and adapt, with significant weight on supporting economic growth and productivity. The NPPF advocates for policies that set out a clear economic vision, proactively encourage sustainable economic growth, and are flexible enough to accommodate new and flexible working practices and rapid responses to changing economic circumstances.

Paragraphs 224 and 225 of the NPPF (December 2023) highlight the need for development plan policies to be up to date with the NPPF to ensure they effectively contribute to sustainable development and economic growth. The adoption of Policy ED1 predates these considerations, particularly the introduction of Class E uses, which aim to encourage flexibility in commercial uses. Therefore, Policy ED1, focusing on specific B1 light industrial development within Economic Development Areas, does not facilitate the flexibility encouraged by paragraph 86 of the NPPF (December 2023). This makes Policy ED1 inconsistent with the NPPF and considered out of date, thus carrying limited weight in the determination of this application which seeks to encourage economic objectives through implementing an alternative employment use.

Furthermore, the policies in the emerging Local Plan 2020-2038 encourage a greater variety of employment uses on the site, reflecting a progressive approach to economic development within the borough. Under the emerging local plan, the site is located within the Southborough High Brooms Industrial Area. Emerging Policy ED 1 outlines the strategic vision for Key Employment Areas (KEAs) across the borough, designating these areas for a broad spectrum of employment uses. Specifically, for the Southborough High Brooms Industrial Area, the policy specifies that Class E uses, including financial, professional, other business uses, and importantly, leisure uses, are deemed appropriate. This directly aligns with this proposal to change the use to a Class E (d) leisure use, thereby adhering to the policy’s encouragement for a diverse range of employment opportunities within designated KEAs.

Emerging Policy ED 2 emphasises the retention of existing employment sites and buildings, advocating for their continued use or conversion to alternative employment-generating uses. This is aimed at supporting the borough’s vibrant and balanced economy. The proposed development represents a change of use within the existing employment framework, transitioning from a B2 general industrial use to a Class E (d) leisure use. Importantly, the proposals will transform the site into a different form of employment use, which is anticipated to generate a greater number of full-time equivalent positions than the existing use. As such, the proposal aligns with Policy ED 2’s objectives to maintain and enhance employment opportunities without necessitating the marketing of the site for alternative uses as the site remains within the ambit of employment-generating activities.

These policies underscore the emerging Local Plan’s support for flexible and diversified employment uses within the borough, especially in designated KEAs like the Southborough High Brooms Industrial Area. The proposal exemplifies this strategic vision by maintaining the site’s employment-generating capacity while adapting to contemporary economic and community needs.

Town Centre Sequential Test

The NPPF defines "main town centre uses" as including retail, leisure, and entertainment facilities, offices, and arts, culture, and tourism developments. The proposed indoor trampoline park (use class E(d)) falls under the definition of a leisure use. The sequential test, outlined in paragraph 91 of the NPPF, mandates that main town centre uses should first seek locations in town centres, then edge of centre, and lastly out of centre locations, requiring demonstration through a sequential test that no suitable and available sites exist in more central locations before considering out of centre sites. Adopted Core Policy 8 stipulates that proposals for main town centre uses not located within defined centres must demonstrate the absence of sequentially preferable sites, aligning with the sequential test’s requirements.

The application is supported by a sequential town centre test. The catchment area for the sequential test has been devised to meet the requirements of the occupier encompassing sites within the local area that are located at an accessible distance to a large encourage population to provide a viable customer base for the indoor trampoline park. The assessment includes town centres and edge of centre locations within the administrative boundaries of both Tunbridge Wells Borough Council and Tonbridge and Malling Borough Council within an appropriate scale of town centre within the respective retail hierarchies. The town centres that were included in the assessment are set out in the table below and sites in the relevant edge of centre locations were also assessed. With reference to main town centre uses, the term “edge of centre” is defined in the NPPF “a location within 300 metres of a town centre boundary”.

Centre Name	Centre Type	Local Planning Authority
Royal Tunbridge Wells	Primary Regional Town Centre	Tunbridge Wells Borough Council
Southborough	Town Centre	Tunbridge Wells Borough Council
Tonbridge, including Hilden Park	Urban Centre	Tonbridge and Malling Borough Council

The property search for potential sequential sites included the following criteria:

is within a town centre or edge of centre location

the site is available as demonstrated by evidence that it is currently being marketed
has GIA that is 10% greater or lesser than 3,174 sqm
has a layout and configuration suitable for a trampoline park use
has sufficient external space for the required car parking provision

The commercial property sites that were reviewed to check the availability of sites are as follows:

Zoopla
Rightmove
Estates Gazette
Local agents sites

The results of the sequential test are set out in Appendix 1. It has been demonstrated that there are no available sites considered to be suitable in respect of the required size, layout, configuration, and car parking provision for the proposed trampoline park use.

As there are no suitable and available town centre or edge of centre sites within the administrative areas of Tunbridge Wells Borough Council and Tonbridge and Malling Borough Council, it has been demonstrated that the proposal passes the sequential test and the main town centre use is appropriate for this location.

Transport

Adopted policy TP1 requires the applicant to demonstrate that there is existing transport infrastructure to serve new development. Adopted policy TP4 specifies that development should not adversely affect the road network's capacity, ensure safely located access with adequate visibility, and not worsen traffic conditions or increase accident risks. Policy TP5 addresses vehicle parking standards, stating that parking provision for developments other than those covered by specific policies will be limited to the maximum necessary, considering local highway conditions. Emerging policies TP1, TP2 and TP3 place a similar emphasis on ensuring both highways safety and that there is sufficient capacity on the road network for new development.

The submission is supported by a Transport Statement confirming that the development has negligible impact on highway safety and the road network's capacity. The Transport Statement evaluates the anticipated traffic generation and its effects which are considered to result in a negligible impact on the highway network in the AM and PM weekday peak hours when the network is at its most constrained, and an insignificant impact on the highway network during the weekend. The proposed development complies with the principles set out under adopted Policies TP1 and TP4 and emerging Policies TP2 and TP3.

The Transport Statement addresses vehicle and cycle parking needs, stipulating adequate provisions in line with the specific demands of the leisure use thereby aligning with adopted Policy TP5 and Kent County Council parking standards. The parking accumulation assessment undertaken by SLR (transport consultant) identifies the need for a minimum of 61 car parking spaces, and the proposals provide 73 car parking spaces which are considered to cater to the needs of all users, including provisions for safe and accessible routes for pedestrians and cyclists, thereby promoting active travel in line with the sustainable transport goals of the development plan.

Energy and Sustainability

The proposed development is to change the use of the building to enable the occupation of the site for an indoor trampoline park use. The potential for proportionate energy efficiency improvements has been considered as part of the proposed development as explained within the Sustainability Statement submitted.

The proposed fit out works have been designed to demonstrate compliance with Core Policy 5 (Sustainable Design and Construction) by implementing a number of measures. This includes the provision of all new sanitaryware meeting best practice efficiency limits, VRF condensing heat pump selected to provide renewable heating on site, in addition to the removal of the existing gas connection and replacement of all lighting and

ventilation systems. Furthermore, the site is within a low flood risk area and the development does not further contribute to flood risk as there will be no increase in impermeable surfacing from the existing situation. In all the proposed development accords with the development plan.

Conclusion

The proposed development exemplifies sustainable development principles by changing an existing industrial site into a vibrant, community-focused indoor trampoline park. The project aligns with policies that prioritise economic diversity, employment generation, and the efficient use of land within key employment areas, supporting the broader goals of sustainable economic growth. Moreover, the development's strategic location ensures accessibility and encourages sustainable transport options, contributing to reduced carbon emissions. By integrating these elements, the proposal aligns with the NPPF's policies for sustainable development as well as the policies within the development plan when taken as whole.

We trust you have all the necessary information in order to validate and determine the application, however please do not hesitate to contact Will Philips (will.philips@savills.com) or myself should you have any queries.

Yours faithfully



Alex Cole MRTPI
Associate Director



Appendix 1 - Town Centre Sequential Test Assessment Results

Sequential Test

North Farm Road – Tunbridge Wells



Site No.	Site	Centre Location	Existing Use	Available	Suitable	Size	Parking Capacity	Comments
1	Unit 92, Hargreaves House, Tunbridge Wells, TN1 2UN	Tunbridge Wells	Retail	Yes	No	473 sqm	No	Retail unit to let. Unsuitable for conversion and insufficient parking for required use. https://www.rightmove.co.uk/properties/139906475#/?channel=COM_LET
2	Café, St John's Road, Tunbridge Wells	Tunbridge Wells (edge of centre)	Café/retail	Yes	No	159 sqm	No	For sale. Insufficient space for required use. https://www.rightmove.co.uk/properties/135277283#/?channel=COM_BUY
3	Land at Mount Ephraim, Tunbridge Wells, TN4	Tunbridge Wells (edge of centre)	PP for resi	Yes	No	0.12 hectares	Yes	Land for sale, insufficient area to provide floorspace needed for required use. https://www.rightmove.co.uk/properties/142269767#/?channel=COM_BUY
4	St James Road, Tunbridge Wells, TN1	Tunbridge Wells	PP for resi	Yes	No	0.12 hectares	Limited	Development opportunity for sale, planning permission for 24 apartments. Insufficient land area for required use and parking. https://propertylink.estatesgazette.com/property-details/6902358-development-opportunity-tunbridge-wells
5	9-10 Calverley Terrace, Crescent Road, Royal Tunbridge Wells, TN1	Tunbridge Wells	Office	Yes	No	469 sqm	Yes	Historic building to let, not feasible to convert into open plan required for required use. https://www.rightmove.co.uk/properties/141024914#/?channel=COM_BUY
6	Townhouse Wine Bar, Calaverley Road, Tunbridge Wells, TN1 2UY	Tunbridge Wells	Restaurant	Yes	No	Not available	No	Restaurant for sale, unsuitable for conversion. https://www.zoopla.co.uk/for-sale/commercial/details/62333139/?search_identifier=9a1af863c233d3ff67444822dd994c9a

Sequential Test

North Farm Road – Tunbridge Wells



Site No.	Site	Centre Location	Existing Use	Available	Suitable	Size	Parking Capacity	Comments
7	Pluto House, 6 Vale Avenue, Tunbridge Wells, TN1 1DJ	Tunbridge Wells	Office	Yes	No	466 sqm	Yes	Office space to let. Unsuitable layout over 4 levels to consider required use. https://www.rightmove.co.uk/properties/127121735#/?channel=COM_LET
8	1 st Floor, Mount Pleasant House, Lonsdale Gardens, Tunbridge Wells, TN1 1HJ	Tunbridge Wells	Office	Yes	No	127 sqm	No	Office space. Unsuitable layout/ size/ headroom to consider required use. https://www.durlings.co.uk/property/mount-pleasant-house-1st-floor-2-6-lonsdale-gardens-tunbridge-wells-kent-tn1-1hj/
9	Mount Pleasant Avenue Car Park, TN1	Tunbridge Wells	Car Park	Yes	No	0.19 hectares	Yes	Development opportunity for sale, insufficient space to provide trampoline park and parking. https://propertylink.estatesgazette.com/property-details/6904480-mount-pleasant-avenue-car-park-mount-pleasant-tunbridge-wells-kent-tn1
10	Land to the rear of 3-5 Lonsdale Gardens	Tunbridge Wells	Car Park	Yes	No	0.13 hectares	Yes	Insufficient space for required use. https://propertylink.estatesgazette.com/property-details/6902545-land-to-the-rear-of-3-5-lonsdale-gardens#
11	The Tunbridge Wells Hotel, The Pantiles, TN2 5TD	Tunbridge Wells	Hotel	Yes	No	Not available	No	Unsuitable for conversion, Grade II listed building. https://www.rightmove.co.uk/properties/136222436#/?channel=COM_BUY
12	London Road, Southborough, TN4	Southborough	Retail/residential	Yes	No	867 sqm	No	First floor site with planning permission for residential units. Not suitable for required use as insufficient floor area on one level. https://www.rightmove.co.uk/properties/139117358#/?channel=COM_BUY

Sequential Test

North Farm Road – Tunbridge Wells



Site No.	Site	Centre Location	Existing Use	Available	Suitable	Size	Parking Capacity	Comments
13	London Road Southborough	Southborough (edge of centre)	Retail	Yes	No	27 sqm	No	Shop for sale, too small for required use. https://www.rightmove.co.uk/properties/143283386/#?channel=COM_BUY
14	13,15,17 Quarry Hill Road, Tonbridge, TN9	Tonbridge	Office (E), permission for residential	Yes	No	385 sqm	No	Development opportunity for sale, planning permission for 10 1 bedroom flats. Would be insufficient space to convert to trampoline park. https://www.rightmove.co.uk/properties/140016392/#?channel=COM_BUY
15	13 Quarry Hill Road, Tonbridge, TN9 2SP	Tonbridge	Retail (E)	Yes	No	144 sqm	No	Retail unit for sale. High street location, too small for required use. https://www.rightmove.co.uk/properties/141279203/#?channel=COM_BUY
16	94A, 94C Shipbourne Rd, Tonbridge, TN10 3EG	Tonbridge	Motorcycle showroom	Yes	No	192 sqm	Limited	Development opportunity for sale, planning permission for 2 residential units. Insufficient space or parking for required use. https://www.rightmove.co.uk/properties/141472295/#?channel=COM_BUY
17	Plot 3, Lytlewood & Russetings, Riding Lane, Hildenborough	Hildenborough	PP for residential	Yes	No	1.25 hectares	Yes	Restrictive covenant limiting use to residential. Unsuitable setting for trampoline park. https://www.rightmove.co.uk/properties/140927201/#?channel=COM_BUY