

Public Consultation on Tunbridge Wells Borough Council's Local Plan: New Evidence Base Documents – summary and response table for comments on Other Allocations (Policies AL/RTW 19 and AL/HA 8) (PS\_108)

Rep No	Consultee Name	Consultee Organisation	Agent Name	Agent Organisation	Document(s) commented on	Proposed Modifications	Comment Summary	TWBC Response	Hearing Session Participation (and reason for participation)
NEBD2-1	Mr Ben McKane				PS_108	<p>Remove this from the local plan, as the whole intention is unsound and quite frankly alarming that it would be pushed by the council.</p> <p>Removing multiple green spaces throughout the town, used by a broader range of its population, centralising it in one location that has no infrastructure and a community that the majority oppose the idea. It makes no sense except, presumably, from a financial view for the council, which then prompts the question of are you serving the people you represent or willingly damaging communities to save/make money.</p>	<p><b>Legally compliant but unsound</b></p> <ul style="list-style-type: none"> <li>Hawkenbury residents will be severely disrupted by the increased traffic and footfall.</li> <li>The evidence base document does not consider or remediate the increased pollution (air, noise and light).</li> <li>The area lacks the infrastructure to accommodate the plan and KCC Highways contentment is misplaced. Their comments also lack credibility due to the disturbance and local highways damage caused by the Hollyfields development.</li> <li>There is only one public transport service which was recently dropped, and only survived with the support of AXA.</li> <li>Suggests removing AL/RTW 19 from the Local Plan as per the suggested modification in the column to the left.</li> </ul>	<p>The additional document – <a href="#">PS 107 Action Note for Action Point 30</a> provides written confirmation from KCC Highways that appropriate access to the site can be achieved. It also demonstrates that KCC Highways is satisfied with the proposed policy amendments relating to the need for a Full Transport Assessment as well as a Travel Plan and a Traffic/Event and Parking Management Plan.</p> <p>Further information is also set out within Action Point 13 (<a href="#">Part 1</a>, <a href="#">Part 2</a>, <a href="#">Part 3</a>), which provides further details on the justification, proposals and mitigation measures. Additionally, revised policy wording to address the requirements made by KCC is proposed which will be set out in detail within the Main Modifications which will be the subject of further public consultation.</p>	Not stated
NEBD20-10		Save Capel			PS_108		<p><b>Unsound, legal compliance not stated</b></p> <ul style="list-style-type: none"> <li>Save Capel (SC) notes the correspondence with KCC on these two allocations AL/RTW 19 and AL/HA 8, although continues to have concerns about the reliance on such late evidence as with the rest of the evidence brought into the examination,</li> <li>However, SC is content with the improvements in policy <i>Policy AL/RTW 19</i> to require a full Transport Assessment, and the need for a Travel Plan and a Traffic/Event and Parking Management Plan.</li> <li>SC notes that KCC H&amp;T have confirmed their support for the removal of this draft allocation and policy, although in view that developers might want to consider any outstanding issues.</li> <li>SC does not have further comments at this stage but would wish to consider</li> </ul>	<p>This comment from Save Capel is noted with regards to their general concern around reliance on late evidence. However, it is also noted that Save Capel are content with the approach to both Policy AL/RTW 19 and AL/HA 8, notwithstanding comments from the promoters of these sites.</p>	<p>Yes, I wish to participate at the examination hearing session - SC intends to continue to participate fully in any remaining stages of the Local Plan's review and will seek to make formal representations in any future hearings during which the issues raised in this representation are discussed</p>

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							other responses to PS_108 in this consultation once they are published.		
NEBD21-2	Mrs Nichola Watters	Wealden District Council			PS_108	<p>WDC suggests adding criteria similar to those in Policy AL/RTW 16 (criterion 10), at least to the supporting text.</p> <p><i>[TWBC: see details in the next column – Comment Summary]</i></p>	<p><b>Legally compliant and sound</b></p> <p><i>[TWBC: applied for the overall Policy STR 1 – Development Strategy (PS_109) as specified in the representation form.</i></p> <p><i>Comments related to PS_108 are then listed here for clarity.]</i></p> <p><u>Comments with regard to Policy AL/RTW 19 (PS_108) as part of the Policy STR 1 – the Development Strategy</u></p> <p>A site near the Wealden District boundary, known as Land to the north of Hawkenbury Recreation Ground (Policy AL/RTW 19), is allocated for a new sports hub with a capacity of up to 3,000 spectators. TWBC has proposed several modifications to this policy, supported by WDC. WDC requests consultation on any planning applications for this development and involvement of East Sussex County Council (ESCC) as the neighbouring Local Highway Authority. WDC also suggests adding criteria similar to those in Policy AL/RTW 16 (criterion 10), at least to the supporting text.</p>	<p>It is acknowledged that the site AL/RTW 19 is on the southern edge of Royal Tunbridge Wells and any development could have an impact on the neighbouring authority of Wealden District Council. However, it is not considered appropriate to use similar wording to AL/RTW16 as this site directly adjoins the borough boundary and the following is stated - <i>Any development coming forward will need to consider any impacts on the adjacent land within the Wealden District Council area, and in terms of infrastructure provision with East Sussex County Council as well as Kent County Council.</i></p> <p>It would be expected that any development coming forward on site AL/RTW19 would necessitate consultation with stakeholders, including the neighbouring authority of Wealden District Council and also East Sussex County Council and it is not considered necessary to explicitly set this out in the policy. A reference could be made within the supporting text should the Inspector consider it necessary for reasons of soundness.</p>	No, I do not wish to participate at the examination hearing session.
NEBD29-2		Bellway Strategic Land	David Murray-Cox	Turley	PS_108	N/A	<p><b>Legal compliance and soundness not stated</b></p> <p>Document PS_108 Note for Inspector on Action Points 27 and 29 – Written statements from KCC Highways on Policy ALRTW 19 and Policy ALHA 8 (September 2024)</p> <p>RE: Policy AL/RTW19 on land to the north of Hawkenbury Stadium Hub</p> <ul style="list-style-type: none"><li>Uphold long held concerns that the Local Plan and the associated evidence base do not fully assess the form and scale of development envisaged in this allocation (a 3,000 spectator stadium with a myriad of supporting / ancillary uses); and this is effectively delayed</li></ul>	<p>Following the Hearing Sessions in 2022 and 2024, the Council has had continued discussions with KCC Highways in relation to this site and its suitability for allocation within the SLP. This has been in respect of both the scale of the development and the access and parking arrangements.</p> <p>Of relevance are the Stage 2 Action Point 13 – Land North of Hawkenbury Rec <a href="#">Part 1</a>, <a href="#">Part 2</a> and <a href="#">Part 3</a> and <a href="#">Stage 3 Action Points 27 and 29</a> – Written statements from KCC Highways on Policy AL/RTW19 and Policy AL/RHA 8. These action Points provide additional information</p>	Not stated.

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							<p>until the planning application stage (such as the requirement to submit a Transport Assessment). The implications and requirements should be fully assessed now.</p> <ul style="list-style-type: none"> <li>There is no explanation or evidence to support KCC Highway's claim that they have assessed the proposed allocation in relation to the suitability of the access to the site and road width.</li> <li>PPG Paragraph: 001 Reference ID: 64-001-20190722 (in terms of assessing the impact of openness of the Green Belt) is relevant – if the allocation is retained, the Site should be removed from the Green Belt.</li> </ul>	<p>and an acceptable approach which has been agreed with officers at KCC Highways. The changes proposed to Policy AL/RTW 19 which have been added as the result of the discussions with KCC, will be the subject of Main Modifications consultation.</p> <p>In terms of the Green Belt – Paragraph 5.118 states that '<i>The site was released from the Green Belt in order to facilitate the provision of a sports hub. The Development Strategy Topic Paper and Green Belt studies set out the exceptional circumstances and compensatory improvements to the remaining Green Belt to justify the changes to the boundary in this location</i>'. This paragraph therefore confirms that the site is proposed to be removed from the Green Belt upon allocation in the SLP.</p>	
NEBD32-1	Messers Nick and Peter Dunlop	Kent Woodware Ltd	Mike Holmes	KLW Ltd	PS_108	<p>If the Inspector agrees with the Council on the proposed deletion of Policy AL/HA 8 of the Submission Local Plan, our Client would ask the Inspector to consider the modification to the policy proposed below.</p> <p>This will allow our Clients to utilise their land in conjunction with the expanding Hawkhurst Station Business Park, supported by the inclusion of additional land to the south of the existing Business Park in proposed Policy AL/HA 7.</p> <p>We would therefore suggest the following modification to the proposed policy –</p> <p>"This site, as defined on the Gill's Green Hawkhurst Policies Map, is reserved for the parking of vehicles at the Hawkhurst Station Business Park. Development on the site shall accord with the following requirements:</p>	<p><b>Unsound, legal compliance not stated</b></p> <p><u>Section 3.0 ad Appendix 2</u></p> <ul style="list-style-type: none"> <li>The Inspector's Initial Findings note from November 2022 states the Limes Grove site is suitable for commercial uses and suggests identifying it for smaller, less-intensive ancillary uses associated with the business park.</li> <li>The site is available now and needed for providing local businesses more space.</li> <li>The Inspector's Initial Findings note suggests rectifying the site's availability by main modifications to the policy rather than deleting it entirely.</li> <li>The Council's Local Plan Development Strategy Topic Paper Addendum (para 7.12 – 7.21) highlights concerns about highways matters for the site.</li> <li>ADL Traffic &amp; Highways Engineering Ltd have sought solutions to address Kent County Council's highways concerns.</li> </ul>	<p>The rationale for the removal of this allocation – AL/HA 8 is clearly set out within <a href="#">Action Point 29 – TWLP/150</a>. This refers to the response received from KCC Highways who state that the technical note prepared by the agent promoting the site, does not resolve the highways concerns on intensification of the site, and therefore, KCC Highways continue to support the removal of the allocation from the Local Plan on highways grounds. that the technical note prepared by the agent promoting the site, does not resolve the highways concerns on intensification of the site, and therefore, KCC Highways continue to support the removal of the allocation from the Local Plan on highways grounds.</p> <p>It is therefore considered appropriate and justified that the allocation is deleted from the Local Plan.</p>	<p>Yes, I wish to participate at the examination hearing session - as it is important that we have the opportunity to present directly to the Inspector, to assist with their assessment of the proposed modifications to the Development Strategy for the Local Plan, in particular the proposed deletion of Policy AL/HA 8 relating to Limes Grove (March's Field),</p>

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						<p>1. The design sensitive to the adjacent historic farmstead and listed buildings;</p> <p>2. A landscape and visual impact assessment that informs the extent of the development proposals, to include the;</p> <p>3. Provision of a landscape management scheme to ensure any impact of development upon the surrounding rural area is minimised in perpetuity, including landscape boundaries of native species;</p> <p>4. There is no unacceptable impact on air quality, having regard to any mitigation measures provided.”</p>	<ul style="list-style-type: none"><li>• One proposed solution includes providing vehicles access through the Business Park to Cranbrook Road and vice versa, removing additional traffic along the full length of Limes Grove and entering or exiting the Limes Grove and Cranbrook Road junction.</li><li>• This improvement would benefit all users and future users of Slip Mill Road by having a site access in a location where suitable widths, and achieving importantly visibility splays.</li><li>• No response received from Kent County Council on the suitability of this alternative solution.</li><li>• Policy AL/HA 8 should not be deleted on highway grounds due to potential deliverable improvements in accessibility.</li><li>• March’s Field is ideal for additional employment land due to its proximity to Hawkhurst Station Business Park. Losing the policy could lead to a loss of employment land within the Borough, potentially making the Plan unsound.</li><li>• Policy modifications are proposed. <i>[TWBC: see the previous column – Proposed Modifications]</i></li></ul>		<p>Gills Green, Hawkhurst. We participated in the previous hearings and our continued participation is a logical extension to the process.</p>