



Tunbridge Wells
Borough Local Plan(2020 – 2038)

Representation Form

Please use a separate sheet for each representation

Ref:

(For official use only)

Name of the Local Plan to which this representation relates:

Proposed Changes to the Tunbridge Wells Borough Local Plan (2020 - 2038): Response to Examination Inspector's Initial Findings, Received November 2022 and Supporting Documents, including Sustainability Appraisal

Completed forms must be received at our offices by midnight Monday 26 February 2024

We encourage you to respond online using the consultation portal. Please note you do not have to sign in to respond via the portal: <https://consult.tunbridgewells.gov.uk/kse/>

Alternatively, you may email or scan forms to: LocalPlan@TunbridgeWells.gov.uk or send them by post to: Tunbridge Wells Borough Council, PLANNING POLICY, Town Hall, Royal Tunbridge Wells, TN1 1RS

Please note that representations must be attributable to named individuals or organisations. They will be available for public inspection and cannot be treated as confidential. Please also note that all comments received will be available for the public to view and cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 2018 and the General Data Protection Regulations 2018.

	1. Personal Details	2. Agent Details (if applicable)
Title	Mr	
First Name	Barry John	
Last Name	Richardson	
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1		

Address Line 3	Tunbridge Wells	
Address Line 4		
Postcode		
Telephone number		
Email address (where relevant)		

PART B – YOUR REPRESENTATION
(Please use a separate sheet for each representation)

Name or Organisation	
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3. To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum?

Chapter and (if applicable) sub heading	
Policy	AL/RTW19
Paragraph number or appendix	

4. Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it: (please tick as appropriate)

4.1 Legally Compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.2 Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

Please give details of why you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 - 2038) (as set out in the Development Strategy Topic Paper Addendum) are not legally compliant or are unsound. Please be as precise as possible.

5. It appears that it is an established fact that neither TWBC or KCC Highways own the verges in High Woods Lane or indeed the lane itself – TWBC has never taken responsibility for cutting the verges or gritting the lane. The ancient hedgerows have always been maintained by HAA (Hawkenbury Allotment Holders Association).

If you wish to support the legal compliance or soundness of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) (as set

If you wish to support the legal compliance or soundness of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) (as set out in the Development Strategy Topic Paper Addendum) please also use this box to set out your comments.

The text box will automatically expand if necessary.

Click or tap here to enter text.

Please set out what modification(s) you consider necessary to the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) Incorporating the Proposed Changes set out in the Development Strategy Topic Paper Addendum, legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness.

6. You will need to say why this modification will make the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The text box will automatically expand if necessary.

Click or tap here to enter text.

7. Please use this box for any other comments you wish to make.
The text box will automatically expand if necessary.

Please see the attachment to this emailed form for concerns to this Policy AL/RTW19.

In addition:

1. Since ownership of the verges (and the lane?) is not known, surely the plans for road widening/creation of passing places cannot be performed by the authority.
2. The TW Football Club has previously stated it would want autonomy to manage the proposed football stadium for 3000 people e.g. it would want to stage events of its choice – pop concerts .
3. Noise pollution, light pollution (outdoor floodlighting - dark skies!) and vehicle pollution impacting on both people and diverse wildlife.
4. Concentration of football facilities into one hub and closing existing ones in the TW area will deny local access to facilities and increase the existing traffic problems in the TW area due to infrastructure limitations.
5. The site is part of the Wealden Clay Ridge, there is a history of local flooding from a stream system and a sewage pumping station runs at full capacity.

8. If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?

- No, I do not wish to participate at the examination hearings
- Yes, I wish to participate at the examination hearings

9. If you wish to participate at the examination hearings stage once it resumes, please outline why you consider this to be necessary:

Click or tap here to enter text.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings stage once it resumes.

Sustainability Appraisal

10.	To which part of the Sustainability Appraisal does this representation relate?
Chapter and (if applicable) sub heading	
Policy	
Paragraph number or appendix	

11. Please use this box for any comments you wish to make about the Sustainability Appraisal.
The text box will automatically expand if necessary

Click or tap here to enter text.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at later stages.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he identifies for examination.

Signature		Date	26/02/2024
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TWBC New Local Plan

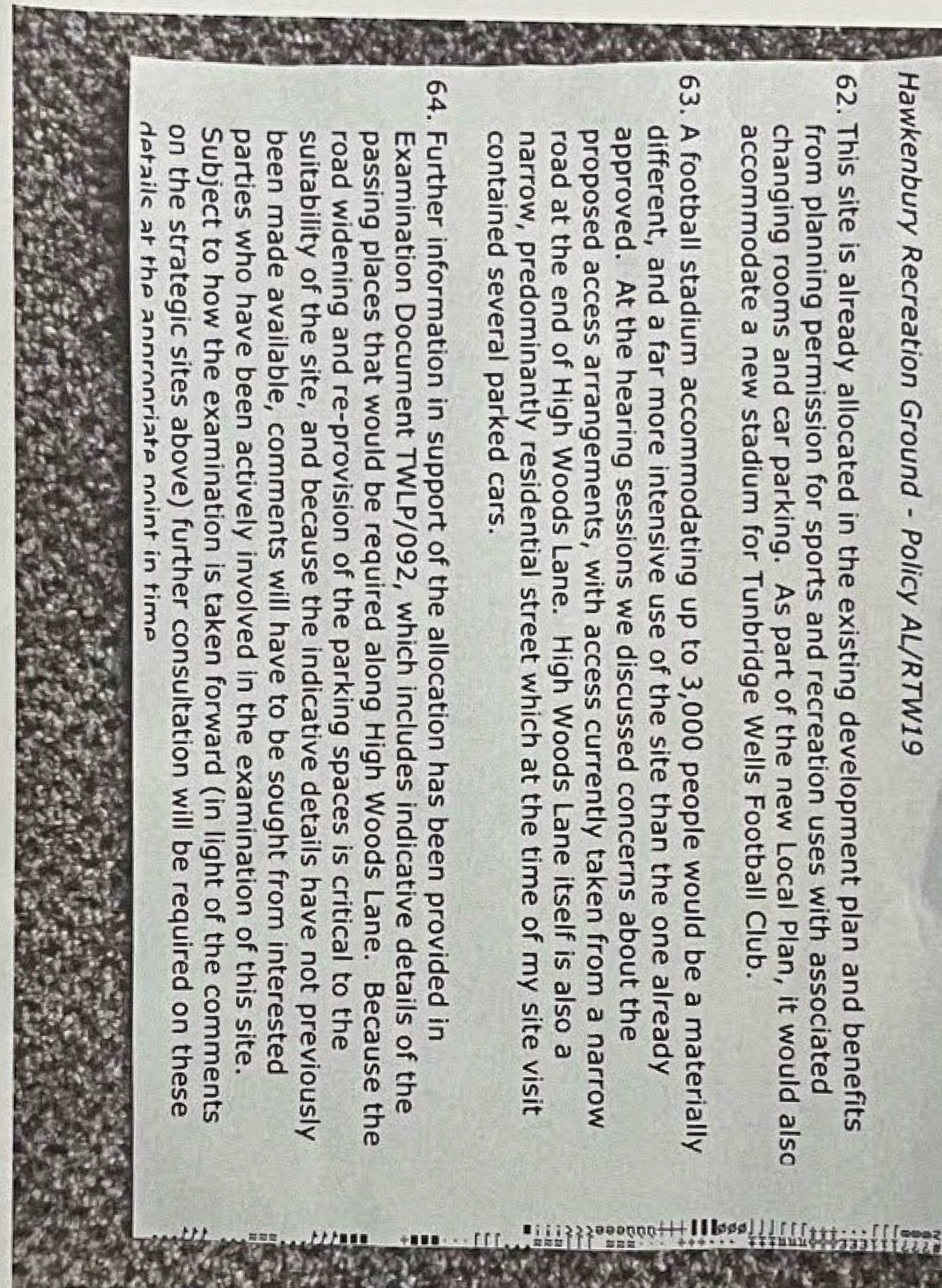
From: Barry Richardson
To: nicholas.pope@tunbridgewells.gov.uk; siobhan.o'connell@tunbridgewells.gov.uk; nancy.warne@tunbridgewells.gov.uk; david.osborne@tunbridgewells.gov.uk; victoria.white@tunbridgewells.gov.uk; ben.chapelard@tunbridgewells.gov.uk; hugh.patterson@tunbridgewells.gov.uk; pamelawilkinson@tunbridgewells.gov.uk; hugo.pound@tunbridgewells.gov.uk; jayne.sharratt@tunbridgewells.gov.uk
Cc: greg.clark.mp@parliament.uk; mike.martin@twlbdems.org.uk; john.hurst@tunbridgewells.greenparty.org.uk
Date: Thursday, 22 February 2024 at 13:45 GMT

Dear Addressees,

Re: Land to the north of Hawkenbury Recreation Ground - Policy AL/RTW19 for Sports Hub (& related Policy AL/RTW20 Land at Culverden Stadium for housing).

My wife and I have submitted returns to the authorities and individuals since the appearance of TWBC's planning application 17/03232/FULL - change of use from agricultural land to sports pitches on land to the right of High Woods Lane and opposite the Royals Indoor Bowls Club. This plan has spread like an unwelcome cancer to include a new stadium for TW Football Club on agricultural land to the left of the lane and behind the bowls club. All this land lies close to the ancient woodland known as High Woods and the lane is 'enclosed' with ancient hedgerows.

TWBC's more recent publications, together with the Inspector's initial report (extract below) and the up-and-coming local and general elections prompts us to write to you all in the hope you will stop this truly horrendous plan in its tracks. Our serious concerns are tabled below.



Hawkenbury Recreation Ground - Policy AL/RTW19
62. This site is already allocated in the existing development plan and benefits from planning permission for sports and recreation uses with associated changing rooms and car parking. As part of the new Local Plan, it would also accommodate a new stadium for Tunbridge Wells Football Club.
63. A football stadium accommodating up to 3,000 people would be a materially different, and a far more intensive use of the site than the one already approved. At the hearing sessions we discussed concerns about the proposed access arrangements, with access currently taken from a narrow road at the end of High Woods Lane. High Woods Lane itself is also a narrow, predominantly residential street which at the time of my site visit contained several parked cars.
64. Further information in support of the allocation has been provided in Examination Document TWLP/092, which includes indicative details of the passing places that would be required along High Woods Lane. Because the road widening and re-provision of the parking spaces is critical to the suitability of the site, and because the indicative details have not previously been made available, comments will have to be sought from interested parties who have been actively involved in the examination of this site. Subject to how the examination is taken forward (in light of the comments on the strategic sites above) further consultation will be required on these details at the appropriate point in time.

- 1. The site is very close to a residential area with an elderly demographic. Many residents enjoy an enviable peaceful environment, not just in the lane but at the nearby Sherborne Close sheltered accommodation.
- 2. Access is restrictive due to the narrow lane and pinch-points. The lane leads to farms and farmland and is therefore subjected to a considerable amount of very heavy vehicular traffic e.g. farm machinery and construction business.
- 3. Vehicle parking is a real problem due to regular use by the large numbers of employees from local businesses, other agencies, commuters and residents' visitors/workmen etc. The lane is the only remaining part-restricted parking area in the whole of Hawkenbury village.

Perhaps more importantly is:

- 4. The proposed site has been in agricultural use for hundreds years and adjoins ancient woodland and hedgerows that provide very valuable wildlife corridors. Nature diversity is considerable. It lies in an AONB and is a natural Green Belt space. This environment has provided continuous access and enjoyment for everyone in the area and further afield, who can benefit from connecting with nature for both their physical and mental health.
 - 5. There is much made by all the various agencies of serious national concerns regarding the need for giving nature a chance, re-wilding, sustainable home-grown food production, reducing vehicular traffic movements/pollution and fuel consumption.
 - 6. This site should not be used to benefit the few or aid powerful developers to cash in on a hugely expensive project for which there is little or no justifiable need.
- Not another case of Calverly Park 'syndrome' please!

Kind regards,

Barry & Susan Richardson,

PS We would hasten to say that we are generally supportive of the provision of good sports facilities. In fact, we fully support our son, who has for many years competed at Team GB European and World Championships level in Triathlon. He is a freelance Personal Trainer and uses local facilities necessary for his training.