



**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
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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	Ian	
Last Name	Kirkham	
Job title (where relevant)		
Organisation (where relevant)		
Address Line 1	<div style="background-color: black; width: 100px; height: 15px;"></div>	

Address Line 2	██████████	
Address Line 3	Kent	
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			
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 type="checkbox"/>
4.2	Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5.	<p>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.</p> <p>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.</p>				
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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.	<p>Please use this box for any other comments you wish to make.</p> <p>The text box will automatically expand if necessary.</p>
	<p>I strongly object to the Sports Hub and relocation of TWFC to Hawkenbury, along with the road widening scheme for the following reasons.</p> <p>The site borders sheltered accommodation and a predominantly elderly population when other sites are available that would not have the same detrimental effect.</p> <p>The road is insufficient for this purpose and the plans to widen High Woods Lane will destroy the ancient hedgerows and bring an increase of through traffic, parking and emissions. The road is filled with parked cars from local businesses and AXA on a daily basis as every other road in Hawkenbury is now subject to residents only parking in order to counter the excessive parking elsewhere, mostly by AXA staff who, despite their best efforts, are unable to convince commuters to park in town and catch their subsidised bus service. If passing places were introduced along High Woods Lane, the daily farm traffic and heavy machinery used in harvesting would struggle to pass. If the entire road was widened, this would mean to destruction of the ancient hedgerow that exists along the entire lane, thereby reducing the size of the long established Hawkenbury Allotment Holders Association site, an act that would see the partial destruction of one arguably sustainable, green site in favour of another that supports increased road use, at a time when the council is trying to appear to have convincing green credentials. For this reason, the site access is entirely unsuitable and would materially change the very nature of this road for the worse. Also, planners seem unaware that the stream that runs across the road before the narrow entrance to the proposed site is actually a part of the wider river system and not simply a culvert that can be filled in to create a wider access point. Drainage has historically been an issue at the site and the field does flood from time to time, plus the pumping station struggles to cope with the amount it's already expected to handle.</p> <p>The original plans for the Sports Hub made no reference to anything other than ball stop fencing and a small changing room. There have since been references to floodlights and now the relocation of TWFC to the site, all of which has not been freely disclosed which does suggest some strategic withholding of information by TWBC Planning, especially those officers who are no longer in post.</p> <p>The impact of noise and lighting from the existing recreation ground is already noticeable on busy days, so a proposed 3,000 capacity stadium, club house, stands, turnstile entry and associated parking would be considerably more intrusive given the local demographic. There have been reports in local print media re antisocial behaviour associated with TWFC which would be most unwelcome in what is currently a quiet residential area.</p>

	<p>Kent FA have already reported via social media that the Hub is already going to happen, despite the project not being agreed or consulted upon, which seems rather undemocratic. Has the decision already been made behind closed doors?</p> <p>TWBC have suggested that the Sports Hub is needed to provide sports provision for future need in relation to increased housing targets imposed by central government. This does not correspond with the fact that housing for local need is not being met, while many new developments are being regularly marketed online to attract foreign investors. At the same time, many local sports fields across the town remain under subscribed even with the current increase in population and in any case, the Sports Hub will be predominantly a niche project sponsored by Kent FA as a centre of football excellence, rather than a facility that provides mixed sports for wider community use.</p> <p>The majority of the local population who will be affected by the Sports Hub and the relocation of TWFC are unaware of the scale of the project, if indeed they know about it at all, which begs the question has TWBC fulfilled its duty to inform those most affected of that is to come and allow them to adequately voice their concerns, when all the evidence points to successive badly managed consultations where nobody is listening, with the concern being purely about legality and compliance. Hawkenbury does not need to be the home for TWBC's latest vanity project.</p> <p>Additionally, the document Action-Point-13-Policy-AL-RTW19-Land-north-of-Hawkenbury-Rec_Part1 is not widely available and makes no attempt to understand the substantial increase in noise, traffic movements and pollution, as well as light pollution would have on those who live closest to the proposed site.</p> <p>Additionally, the statement that TWBC owns the HAHA site and can proceed to widen the road does not account for the fact that TWBC does not own the verges or the hedgerows as stated by TWBC Parking Department during consultations around parking restrictions on High Woods Lane.</p>
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8.	<p>If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?</p>
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- 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.	<p>Please use this box for any comments you wish to make about the Sustainability Appraisal.</p> <p>The text box will automatically expand if necessary</p>	
<p>Click or tap here to enter text.</p>		

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	26/2/24
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