

31st May 2024

By email

Mr M Birkinshaw
Planning Inspector
C/O Charlotte Glancy
Programme Officer
Banks Solutions
80 Lavinia Way
East Preston
West Sussex
BN16 1DD

Dear Mr Birkinshaw

TUNBRIDGE WELLS LOCAL PLAN EXAMINATION STAGE 3 HEARINGS

STATEMENTS ON BEHALF OF BELLWAY

This letter is submitted on behalf of Bellway Strategic Land and serves to provide hearing statements in relation to the Tunbridge Wells Local Plan Examination Stage 2 sessions.

As the Inspector will have seen, Bellway is promoting, and has an option to purchase land north and south of High Woods Lane, Hawkenbury, to the east of Tunbridge Wells. The southern part of that area (the land south of High Woods Lane) is subject to an allocation in the draft Local Plan under Policy AL/RTW/19 (Land to the north of Hawkenbury Recreation Ground) which is proposed for new and enhanced sport and recreation provision as part of a new stadia sports hub.

As Bellway have consistently stated, **the landowners of this site have no intention of making the land available for those purposes**, although Bellway have explained how they would be willing to work with the Council to explore how a residential proposition on their wider landholding could help to facilitate the delivery of these sports uses. A Framework Masterplan showing how the land promoted by Bellway could be developed is at **Appendix 1**.

Public consultation was carried out on the Council's response to the Inspector's Initial Findings (issued in November 2023) between January and April 2024.

As part of that consultation, the Council published a Summary (Table) of Proposed Modifications to the Development Strategy as well as Post-Initial Findings Evidence Base Documents. The Proposed Modifications to the Development Strategy did not identify any changes proposed in relation to Policy AL/RTW19. In addition, we note that the Post-Initial Findings Evidence Base Documents did not include the material contained within document TWLP_092 which provided the 'Local Plan Examination Note for Inspector in response to Action Point 13 regarding Policy AL/RTW19 (Land at Hawkenbury) and AL/RTW 22 (Land at Bayham West)' (September 2022).

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MATTER 1 – GREEN BELT ASSESSMENT, SUSTAINABILITY APPRAISAL AND LOCAL PLAN REVIEW

Issue 1 – Green Belt Study Stage 3 Addendum

Q1. Does the Stage 3 Addendum adequately address those concerns raised in the Inspector’s Initial Findings that sites had not been considered on a consistent basis where harm to the Green Belt is concerned?

Q2. What is the list of reasonable alternative site options in Table 2.1 based on and have an appropriate range of options been tested?

We note that the land promoted by Bellway is considered in Document PS_035 (Green Belt Assessment Stage 3 Addendum) under references 53(a) and 53(b). However, what we cannot establish is the basis upon which site 53 (a) (Plot A: Land to the north of Hawkenbury Recreation Ground which is proposed for allocation under Policy AL/RTW19) was assessed. Was it: considered as a residential site, upon which it has been promoted (on behalf of Bellway, who have an option in relation to the land); or as “A new sports hub to include standing or seating and other ancillary structures”¹; or is it for a 3,000 seater stadium and all that is envisaged in Document TWLP_092 as discussed below.

Whilst we note that Document PS_035 explains how site 53 (a) was “Assessed at Stage 3 (AL/RTW 19)”, as far as we can tell, the **Green Belt Study Stage 3 (Chapter 4 Draft Allocation Sites Harm Assessment) did not include any text which appears to consider the nature of what is actually envisaged (for example there is no reference whatsoever to a 3,000 seater stadium).**

We also note inconsistencies in Document PS_035. In table 2.1, area 53 (a) is referred to as 12.61 hectares, with area 53 (b) as 7.07 hectares. In table 3.1 site 53 (a) is referred to as being 7.07 hectares.

Q3. How did the Council use the information from the Stage 3 Addendum to determine whether or not exceptional circumstances exist to alter the Green Belt boundary as proposed by the submission version Local Plan?

This is a matter for the Council.

Q4. The Stage 3 Addendum found that some sites (around Five Oak Green) would only cause Low or Low-Moderate harm to the Green Belt. Given that the Plan seeks to meet housing needs in full, but will only provide for around 10 years’ worth of housing land supply, why have these sites not been considered for allocation as part of the examination of this Plan?

As we consider in our Statements for other sessions, we do not consider that the Plan is justified by providing for 10 years worth of housing. We consider that (not only in relation to Five Oak Green) that there are sites within the Borough which can accommodate housing and reiterate the concerns previously expressed that the Council has overstated the contribution which the land promoted by Bellway makes to the Green Belt purposes.

Q5. Where relevant, have the findings in the Stage 3 Addendum been used to update the Strategic Housing and Economic Land Availability Assessment?

In relation to Site 53², the SHELAA (Document PS_036) explains how the ‘Potential yield if residential’ is “Not to be allocated for residential”. In our view the SHELAA analysis of this land is flawed as a consequence.

¹ As referred to in Document ‘3.96b LVIA Section 6.3 RTW sites’

² Described as Plot A: Land to the north of Hawkenbury Recreation Ground and Plot B: Land to the east and north of Hawkenbury allotments, Tunbridge Wells

As for 'Suitability' the SHELAA explains that *"The southern site (Plot A) is considered to be suitable for the uses proposed above, namely sport and recreation uses."* However, the assessment also states that the *"Site has been assessed for development potential, notably for residential use or recreation use."* **Accordingly, the SHELAA appears to set out the Council's conclusion that the site is acceptable for residential development.**

As with our concerns expressed in relation to other evidence base documents (namely Documents 3.96b 'LVIA Section 6.3 RTW sites' and PS_035), the SHELAA analysis of site 53 contains no consideration whatsoever of the form of development which the Council seems to envisage in this location. It is correct to say that under 'Issues to consider' the SHELAA identifies that the lower part of the site (53 (a)) has planning consent for the change of use of part of the land to expand existing recreational facilities, however that form of development is a far cry from what is envisaged.

In our submission, the Council's approach to assessing Site 53 (a) (in particular) has been flawed from the outset.

We can find no evidence to suggest that it has ever had regard to the form of development which is envisaged in this location. Its evidence base consistently refers to sports use. Sports uses may take many forms. They may be similar to the change of use applications submitted by the Council; or they may take the form of stadia capable of seating thousands of spectators which also serve as wedding and party venues. Concluding that a site is an appropriate location for the former, does not imply it is appropriate for the latter.

MATTER 2 – THE STRATEGY FOR ROYAL TUNBRIDGE WELLS AND SOUTHBOROUGH

Issue 3 – Hawkenbury Recreation Ground, Royal Tunbridge Wells - Policy AL/RTW19

Q1. What is the type and scale of development proposed at the Hawkenbury Recreation Ground? Is this sufficiently clear to the users of the Plan?

No. In Bellway's considered opinion, the nature of the development proposed is particularly unclear. Not only is it unclear to users of the Plan as the Inspector addresses in this question but, as we explain below, we question whether it was sufficiently clear to the authors of the evidence base upon which the LPA relies.

In document TWLP_092, paragraph 4.3 provides an explanation as to what the Council expects to be delivered:

"In reference to the current permitted scheme – as set out within the Councils hearing statement – the site already benefits from planning permission (21/00300/FULL), granted in April 2021, albeit a less intensive scheme for sports pitches without the stadia currently proposed within the allocation."

Yet it is section 2 of that document which purports to set out 'Further detail of the proposed project', but this does not contain any reference to the 'stadia' envisaged in section 4. Section 2 of the document directs the reader to two appendices (a Business Case Report dating from March 2019 at Appendix 1 and an indicative estimated timeline for the project at Appendix 2).

The Business Case Report at Appendix 1 of TWLP_092 appears to identify the nature of the proposed facility at paragraph 1.15. What appears to be envisaged is a stadia pitch with floodlights, changing facilities and medical facilities, a club house to provide bar and catering facilities for up to 150 guests (standing) or 70 seated which might serve a range of events including business meetings through to 'parties and weddings', a board room/meeting room/coach education room, various new community facility aspects, including additional pitches and associated changing facilities. A plan, purporting to show how the scheme could be provided is shown on page 32 of the document.

At paragraph 4.76, the Business Case Report then states *"Based on a 3,000 spectator stadium at maximum occupancy, there would be a requirement for 200 parking spaces..."*. As far as we can tell, that is the only point at which document TWLP_092 (or any aspect of the evidence base) provides any indication of the stadium which the Council envisages.

As for the Policy itself we refer to the Submission version of the Local Plan where the supporting text and Policy AL/RTW19 are found from page 119 onwards. The supporting text sets out the current planning policy status of the site, being allocated for sports pitches and other outdoor recreation facilities and explains the most recent planning history (associated with application 21/00300/FUL), which it describes as:

“change of use of the land to expand the existing recreational facilities through the provision of additional sports pitches, together with associated access, car parking provision, ‘ball stop’ fencing, changing rooms, and ground works”

Appendix 2 to this Statement includes the ‘masterplan’ associated with that permission. The permission itself was highly unusual in that it is for the ‘change of use’, but also includes built elements (including changing facilities), the details of which were not provided with the application.

Significantly, paragraph 5.120 continues by stating:

“This site allocation takes this permission forward and seeks to enhance the area’s provision of sporting facilities in the form of a new stadia sports hub to serve the wider area...”

The first point we note is that the allocation does not ‘take the permission forward’ as the draft Local Plan suggests. If the reference at 5.120 of the Plan (and the Business Case Report) is correct in referring to a ‘stadia sports hub’, that is a fundamentally different proposition to the planning permissions.

The Policy itself contains similar points, referring to a ‘stadia sports hub’. There are 10 bullet points within the Policy, but no indication that the scale and intensity of the scheme is as envisaged within the Business Case. There is no reference to the size of the stadium, or the broad range of uses it might accommodate, such as ‘parties and weddings’. Unless the term ‘other ancillary structures’ is relied on and found to be sufficient, there is no explanation that as to the broader concept of the proposal, for example the amount of changing facilities, of floodlighting which might be incorporated.

As far as we can tell, the Green Belt Study Stage 3 (Chapter 4 Draft Allocation Sites Harm Assessment) considered this site, but did not consider but we cannot identify any text which appears to consider the nature of what is actually envisaged (for example there is no reference whatsoever to a 3,000 seater stadium). We cannot find any evidence to suggest that the impact of the proposal (as envisaged or in the Policy) on the AONB (National Landscape) was considered. Document 3.95 includes the AONB Setting Analysis, however we cannot find reference to this proposed allocation in that material.

The fact that the authors of the evidence base did not have full details of what is envisaged is demonstrated further through Document ‘3.96b LVIA Section 6.3 RTW sites’ which states (under reference RTW 23) that the proposal is for “A new sports hub to include standing or seating and other ancillary structures”. That is a far cry from what is envisaged in Document TWLP_092 or the concept of a ‘stadia sports hub’.

Despite all of the above, what the Local Plan envisages at this site is “a new stadia and sports hub’, whilst the evidence upon which the Council relies (TWLP_092) envisages a 3,000-seater stadium with a range of other facilities, including for weddings and parties.

This statement is based on two key principles:

- The Council's evidence base (for example the Green Belt Assessment, AONB Setting Analysis or LVIA) fundamentally fails to consider the nature of what is proposed; and
- If the Club's aspiration is for a 3,000 seater stadium, the Council has selected the wrong site. By virtue of TWLP_092 (and Appendix 1 of that document) we strongly consider that those aspirations will not be achieved here and if those aspirations remain, the Club would need to look for a new site.

Q2. Does the additional information in Examination Document TWLP_092 demonstrate that a safe and suitable access can be achieved for all users and that sufficient on and off-site car parking can be provided to serve the development?

As is often the case with this Policy, our initial concerns arise from the question of what is meant by 'the development'.

Document TWLP_092 (paragraph 4.3) states:

"As part of the planning application process, comments were made by KCC Highways as part of the planning application consultation in March 2021 in relation to the extent of any road widening required at High Woods Lane and the requirement for a safety audit of the whole length of High Woods Lane. These were referred to at the hearing session. The Case Officer who dealt with the planning application has confirmed that these issues were both dealt with through the consideration of the planning application and are addressed within the Officers report."

We have provided the County Council's representations (dated 16th March 2021) on the application at **Appendix 3**. Those representations highlight inconsistencies between the quantum of parking proposed (65 spaces referred to in the Transport Statement; 65 plus 15 spaces being shown on grass mesh) (the Committee Report clarified that 80 spaces were proposed). The representations also state that the access to the site is from the private section of High Woods Lane as well as a number of other considerations.

In relation to the access, the Committee Report on application 21/00300/FUL includes various references to the private nature of the road, including this text at paragraph 7.19:

"(Officers' Note: the widening works to High Woods Lane would, as last time, take place on the private section of road around the new access. KCC Highways are not responsible for this section of the road. KCC Highways did not request a Stage 1 Road Safety Audit last time on the identical application. This is an allocated site in the adopted 2016 Site Allocations Local Plan and the principle of an access at this location for this development has previously been accepted in that document and in the previous approved application by both KCC Highways and the Council as Local Planning Authority)."

We strongly dispute the claim in TWLP_092 that KCC's concerns were addressed through the consideration of the application.

Access

In paragraph 7.20, the Committee Report explained how the road widening was not proposed within the highway, only on private land. In Bellway's submission this further reinforces the fact that this is not a proposal which is within the Council's control to deliver.

The Council now continues to accept that *“some localised road widening along High Woods Lane would need to be achieved in order to accommodate traffic movements associated with the proposed use – particularly buses and coaches. This is considered to be achievable subject to detailed design considerations at the planning application stage.”* (paragraph 4.6 of TWLP_092). However it is evident that the proposal envisaged in the draft Local Plan Policy is for a very different scale (and intensity of use) than envisaged in the two planning permissions. Even if the concerns raised by KCC in their representations of March 2021 were satisfied (which we dispute), that is entirely irrelevant to the question of whether the scheme now envisaged is.

Document TWLP_092 suggests (paragraph 4.7) that the full 3,000 seater stadium would be *“achieved incrementally”*. That misses the point. If this allocation envisages a 3,000 seater stadium (as the ‘overall aspiration’ of TWFC) then it should be assessed as such and shown to be achievable, including in relation to highways and access.

Document TWLP_092 includes (Appendix 3) an indicative plan of the access arrangement. Despite the various references to discussions with KCC that the access has been shown to deliverable or appropriate.

Parking

Parking is discussed in section 5 of TWLP_092, with further information provided at Appendix 1 which states (paragraph 4.76) that *“Based on a 3,000 seater stadium at maximum capacity, there would be a requirement for 200 parking spaces.”* Paragraph 4.77 states that the plans to date show that c. 150 spaces can be accommodated. Paragraph 4.80 highlights that *“There is a further requirement for parking for participants, i.e. players, staff, officials, about 43 separate spaces to the east of the facilities are proposed.”*

We note that the scale of parking envisaged reinforces that this proposal is significantly different (in nature and intensity) to the schemes which have been granted consent.

It is evident from the text at paragraphs 4.76 – 4.82 of Appendix 1 to TWLP_092 actually only serves to suggest that the site cannot accommodate parking to serve the Club’s overall aspirations (i.e. a 3,000 seater stadium).

We acknowledge that 4.79 identifies ‘suggestions’ for other spaces, but we submit that no confidence can be had to the deliverability of these.

If that is the Club’s aspiration, we submit that the Council has selected the wrong site. The evidence itself suggests that this is not achievable in this location. The net effect is that if the Club wishes to achieve that aspiration it may be left with substandard facilities or need to consider moving again.

Q3. Does the additional information demonstrate that the site is deliverable?

Bellway have always maintained that the site is not deliverable. The Borough Council has no legal interest in the land. This appears to be recognised through document TWLP_092 which refers to the potential use of Compulsory Purchase Orders. As Bellway has confirmed before, the landowner has no intention to make the land available for the envisaged purpose, although Bellway have indicated that they would be willing to engage with the Council to establish how a housing scheme on their wider land interests could facilitate the Council’s aspirations.

The planning permission was granted on 15 April 2021 under reference 21/00300/FUL and subject to a condition that the development shall be begun before the expiration of three years from the date of the decision. So far as we can establish from the Council’s Public Access system, the applicant has made no attempts to discharge the planning permission and therefore we assume that the permission has expired.

An earlier planning permission for a similar scheme (under reference 17/03232/FULL) expired without any attempts having been made to discharge conditions, secure the land or implement the planning permission.

The Council has now granted itself planning permission twice in relation to sports uses at this scheme, but progressed neither of those consents towards implementation.

Notwithstanding the indicative estimated timeline for the project at Appendix 2 of TWLP_092, Bellway respectfully suggest that significant doubt should be raised about the Applicant's intention and desire to pursue this proposition. Twice it has granted itself planning permission for a scheme in relation to the site and twice it has failed to enable its implementation.

It is also clear that the timetable (which is particularly difficult to follow) set out in Appendix 2 of TWLP_092 will not be achieved. That is based on an application being submitted in September 2023. That has not been achieved.

In addition, we note that despite the length of time which this site has been allocated for, and despite granting itself planning permission twice, as far as we are aware, the Council has never made any attempts to initiate the Compulsory Purchase Order process.

Q4. What changes (if any) are necessary to Policy AL/RTW19 to ensure that the Plan is sound?

On the basis of Bellway's previous representations to the draft Local Plan, their previous examination hearing statements, and the comments set out above, the Policy should be deleted in order for the Plan to be sound.

MATTER 8 – MEETING HOUSING NEEDS

Issue 1 – Housing Requirement and Meeting Housing Needs

Q1. Does the housing requirement and plan period from the submission Plan remain justified and up-to-date? If not, what changes are required to make the Plan sound?

Whilst we do not make any specific observations regarding the housing requirement, it is plain that the Local Plan will (by virtue of a plan-period to 2038) provide for 15 years after adoption. In our view that is inconsistent with the expectations of the NPPF and PPG.

If the Plan is adopted this financial year (24/25), it will provide for 12 full years post adoption (and one year in part, depending on the date of adoption).

We recognise that one of the reasons for this situation is the length of the examination process. However, we do not accept that this is justification for a shortened plan-period post-adoption. This is a situation of the Council's own making and it could have been avoided if the Plan itself were soundly based and did not need significant work to be undertaken after the Examination process commenced.

The Plan-period should therefore be extended to provide for 15 years post adoption.

Q2. What Main Modifications are required to the housing trajectory and projected sources of supply as a consequence of the Council's suggested changes to the Plan? Are the suggested changes based on accurate and up-to-date information?

No comment.

Q3. Does the total housing land supply include an allowance for windfall sites? If so, what is this based on and is it justified?

No comment.

Q4. Does the Plan identify specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 of the Plan? If not, how many years' worth of supply does it identify?

Q5. As modified, would the Plan be positively prepared? Would it provide a strategy, which, as a minimum, seeks to meet the area's objectively assessed needs?

Q6. If not, how could the Plan be modified to make it sound?

Response to Q4 – Q6.

The Plan should be one which meets (as a minimum) the requirement over the plan-period as a whole if it is to be sound. The plan-period remains 2020 – 2038, yet the Council's proposed changes explain how provision is to be made for a minimum of 12,006 dwellings.

The table in PS_062 Updated Local Plan Housing Trajectory - 1 April 2023 Position indicates a total supply of 9,091 dwellings over that period 2020 – 2038 (from allocations, windfalls and extant planning permissions (1st April 2023)). The same document indicates the total supply of 10,993 dwellings including completions in the first three years). That represents a shortfall of 1,013 (against the minimum figure) at the end of the plan-period.

The only conclusion which can be drawn from the evidence is that the Plan does not seek to provide a strategy, which, as a minimum, seeks to meet the area's objectively assessed needs. It is therefore not positively prepared

Document 'PS_054 Development Strategy Topic Paper Addendum January 2024' itself recognises that the Plan will result in a shortfall.

In our view, the only appropriate remedy to make the Plan sound in this respect is to ensure that it does provide a strategy, which, as a minimum, seeks to meet the area's objectively assessed needs.

Issue 2 – Five-Year Housing Land Supply

Q1. What will be the five-year housing land requirement upon adoption of the Plan?

In document 'PS_054 Development Strategy Topic Paper Addendum January 2024' the Council claims (paragraph 13.5) that the Council would be able to demonstrate 6.13 years supply (using the Liverpool method) at the point of adoption. We note that the same document includes some commentary on matters such as the lead in times to first occupations and the delivery of developments, however that material does not cover the allocations / supply in general terms. We understand that the basis of the Council's claimed supply of 6.13 years is Document 'PS_067 Five Year Housing Land Supply Statement 2022-2023'. That document does include information regarding other sources of supply (namely extant planning permissions), however it does to appear to include any evidence to demonstrate the basis upon which delivery rates have been calculated.

On this basis, whilst the Council has claimed that it will be able to demonstrate 6.13 years supply at the point of adoption, we cannot find any evidence to substantiate that view.

Q2. Based on the latest housing trajectory, how many dwellings are expected to be delivered in the first five years following adoption of the Plan?

Q3. Where sites have been identified in the Plan, but do not yet have planning permission, or where major sites have only outline planning permission, is there clear evidence that housing completions will begin within five years?

We have not had sight of that evidence at this stage. Document 'PS_054 Development Strategy Topic Paper Addendum January 2024' includes commentary from the Council as to its expectations about lead in times, but we have not seen any updated correspondence (in the Local Plan evidence base itself) from the promoters of sites to reinforce the trajectory.

Q4. What allowance has been made for windfall sites as part of the anticipated five-year housing land supply? Is there compelling evidence to suggest that windfall sites will come forward as expected in the first five years?

No comment.

Yours sincerely

David Murray-Cox

Director

David.murray-cox@turley.co.uk.

Appendix 1: Framework Masterplan for the land promoted by Bellway



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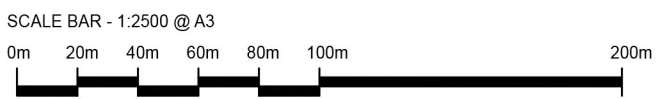
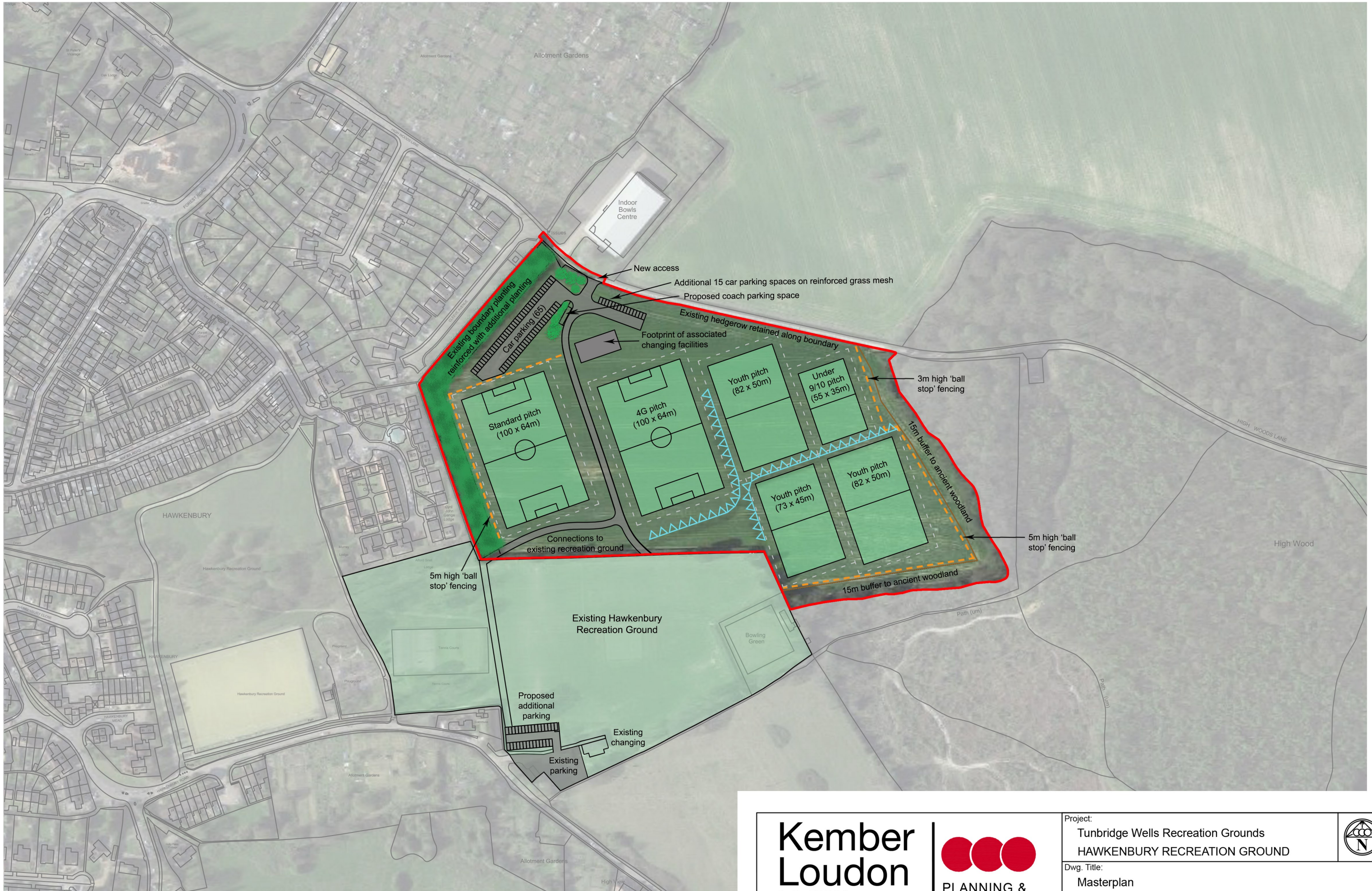
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- Site Boundary
- 1 Vehicular Access
- 2 Sports Pavilion and Parking
- 3 Proposed pedestrian links
- 4 Proposed attenuation
- 5 Proposed allotments
- 6 Proposed Equipped Play Space
- 7 Proposed Planting
- 8 Proposed pitches with appropriate terracing to provide level pitches
- 9 Proposed Woodland Copse Planting
- 10 Existing Public Rights of Way (PRoW)
- 11 15m Buffer to Ancient Woodland

CLIENT	
Bellway Homes Ltd	
PROJECT	
Land at Mousden Farm, Halls Hole Road, Tunbridge Wells	
DRAWING:	
Framework Masterplan	
PROJECT NO.	STATUS
BELR3032	Preliminary
DRAWING NO.	SCALE
3002	1:2000 @ A2
REVISION	DATE
-	12 June 2018
	CHECKED BY
	CD



Appendix 2: Masterplan for application 21/00300/FULL



**Kember
Loudon
Williams**



**PLANNING &
DEVELOPMENT
CONSULTANTS**

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Ridgers Barn, Bunny Lane, Eridge, Nr Tunbridge Wells, Kent, TN3 9HA
VAT Registration Number 509 95 95 95. Registered in England No: 04996123 at the above address.

Project:
Tunbridge Wells Recreation Grounds
HAWKENBURY RECREATION GROUND



Dwg. Title:
Masterplan
FOR PLANNING PURPOSES ONLY

Scale: 1:2500 @A3 Date: September 2017

Drawn by: CWJ

Dwg: 00/000/01

Rev. C

Project Manager: CS

Appendix 3: KCC Highways response on application 21/00300/FULL



Tunbridge Wells Borough Council

Highways and Transportation

Ashford Highway Depot

4 Javelin Way

Ashford

TN24 8AD

Tel: 03000 418181

Date: 16 March 2021

Application - TW/21/00300/FULL

Location - Land Adj To Royal Tunbridge Wells District Indoor Bowls Club Ltd, High Woods Lane, Royal Tunbridge Wells, Kent, TN2 4TU

Proposal - Change of use of land to expand the existing recreational facilities through the provision of additional sports pitches, together with associated access, car parking provision, 'ball stop' fencing and ground works

Thank you for your consultation in relation to the above planning application. I have the following comments to make with respect to highway matters :-

It is disappointing that the applicant has not taken into account the advice provided during the pre-app process in September last year. Therefore additional information is required in order to assess this application.

The Transport Statement refers to 65 parking spaces, yet the masterplan shows 65 spaces plus 15 spaces on grass-mesh. Could the applicant please confirm which of these is correct and update accordingly. Please note that these are the spaces within the red line plan: the 30 spaces adjacent to Hawkenbury Pavilion cannot be assumed as being for the exclusive use of this proposal when games are being played.

The TS states that the access to the proposal site is from the private section of High Woods Lane. The interest of the Highway Authority is therefore regarding the impact of the development on the local network, and the safety issues that may arise on the nearby residential roads as a result of inadequate parking. The applicant has not yet addressed either of these issues adequately.

The TS states in para 2.11: There will need to be some localised widening of the lane to allow for two cars to pass easily. Can the applicant please provide a plan showing where this widening is proposed, and a RSA1 please. Ideally the whole length of High Woods Lane should be safety audited based on the proposed changes to the road width and the increase in traffic along here.

There is reference to the Borough Council being able to control the booking process to limit the number of pitches being used at once. How can this be guaranteed if there are overflow parking issues? If TWBC cannot be conditioned to limit bookings to an agreed level (or in reaction to traffic/parking issues that may arise), the worst case scenario must be assessed, which would be that all 6 pitches are in use at once. The number of participants is clearly listed in Appendix B which is helpful. This predicts up to 160 players across all 6 pitches. With 80 parking spaces (applicant to confirm) available, the assumption that 59 cars/108 trips can be assessed as a maximum seems unlikely. A more robust assessment would

be 80 cars/190 trips. The narrowness of High Woods Lane (owing to unrestricted on street parking) is therefore a concern, and the applicant should provide analysis to illustrate how this would work on a match day – including how road widening referred to in the TS would improve the situation.

The applicant states that the pitches will be used at weekends with the busiest time being Sunday morning/lunchtime. Will the pitches be used in the after school/PM peak during weekdays? At pre-app, I asked that trips be added to the local road network through a transport model to better understand the impact of this proposal. Confirmation of when the pitches will be in use, and whether TWBC are able to limit the use through condition is required before this can be ruled out. It is possible that the network PM peak needs to be modelled and assessed if the pitches are to be used at this time. Weekend assessments may also be required. The Halls Hole Road/A264 Pembury Road is a particularly sensitive junction on the network and additional trips from this site may require assessment to understand the impact here and possibly elsewhere.

I note that the comments from the TWBC Parking Services team of 10th March reflect similar concerns.

Yours faithfully

Vicki Hubert

Principal Transport & Development Planner