Examination of the Tunbridge Wells Borough Local Plan

Tunbridge Wells Borough Council Hearing Statement

Matter 2: The Strategy for Royal Tunbridge Wells and Southborough

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

Document Reference: TWLP/121



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Matter 2 – The Strategy for Royal Tunbridge Wells and Southborough

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

Inspector's Question 1: [re: Type and scale of development]

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

TWBC response to Question 1

Introduction

- 1. Policy AL/RTW19 Land to the North of Hawkenbury Recreation Ground, of the Submission Local Plan (SLP) sets out the policy for this site, which is located adjacent to the existing Limits to Built Development (LBD) of Royal Tunbridge Wells, to the south of the town centre. It is located immediately adjacent to the existing Hawkenbury Recreation Ground, a council run facility, which consists of a range of formal and informal recreation uses. It is also in close proximity to the indoor bowling centre which lies to the north of the site.
- This site was discussed at the Stage 2 Hearing session on the 21 June 2022 and the Council's hearing statement on this matter <u>TWLP/037 – Matter 7 – Residential Site</u> <u>Allocations, Issue 1: RTW and Southborough (Policies STR/RTW1 and STR/SO1)</u> (<u>TWLP_037</u>) sets out the Council's response to the Inspector's MIQ's at that stage.
- 3. A number of issues were discussed (at the previous hearing session, in particular in relation to the proposals set out within Policy AL/RTW19, the access arrangements and the parking provision to serve the proposed development.
- 4. Following the Hearing session on the 21 June 2022, the Inspector confirmed that he required further information from the Council in relation to a number of elements of the proposal including:

- Further detail of the proposed project in relation to the high-level proposals for the site to include pitch configurations, parking, deliverability, financing, and how the facility can be operated.
- High level costings of the project.
- Transport and highways details primarily in relation to the access arrangements and any required road widening to facilitate the scheme.
- Parking details of on-site and any off-site parking requirements

Consideration

- 5. The site is already allocated in the adopted Tunbridge Wells Borough Site Allocations Local Plan (July 2016) AL/RTW 30 (Land adjacent to Hawkenbury Recreation Ground, Royal Tunbridge Wells) so it is clear that there is ambition to deliver enhanced sporting facilities at the site.
- 6. This site is referred to within the <u>SLP</u> at Strategic Policy STR/RTW 1 The Strategy for Royal Tunbridge Wells which refers at bullet point 15 to 'the provision of a new sports hub at Hawkenbury Recreation Ground, to provide expanded and enhanced facilities to include standing/seating for supporters and other ancillary structures...'. It is also referred to in the supporting text to Policy STR 5 Infrastructure and Connectivity, at paragraph 4.95 under sport and recreation.
- 7. SLP Policy AL/RTW19 Land to the North of Hawkenbury Recreation Ground, sets out the detailed policy in regard to this site. The supporting text at paragraph 5.120 specifically states: 'This site has planning permission under 21/00300 for 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 (21/00300/FULL). 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 urban area, as set out within Policy STR/RTW 1. The hub will primarily be used by sports clubs and leagues for training and match play, but also to provide activities and sports programmes for general community use to increase physical activity and wellbeing'.

8. Additionally, the policy wording of AL/RTW19 itself refers to the following:

"This site, as defined on the Royal Tunbridge Wells and Southborough Policies Map (Inset Maps 1a-1d and 2), is allocated for new and enhanced sport and recreation provision as part of a new stadia sports hub, to include standing/seating for supporters, other ancillary structures, and increased parking provision.

Development on the site shall accord with the following requirements:

- 1. Development is dependent on the football stadium relocating from the current Culverden Stadium subject to allocation Policy AL/RTW 20;"
- 9. The associated Site allocation plan, and inset Maps 1a-1d and 2 clearly identify the location and the site boundary to users of the Plan. The Council considers that the above wording is clear to the reader of the plan on what the proposals for the site include enhanced sport and recreation provision as part of a new stadia sports hub which will replace the current stadium at Culverden Stadium, Culverden Down (SLP Policy AL/RTW 20). Also, to ensure clarification, the text makes reference to the most recent planning permission on the site so as to avoid any confusion between what is already permitted on the site and what is proposed within the SLP. Additional wording of clarification was added to the SLP (para 5.120) following consultation on the previous version of the plan (Regulation 18 Draft) (3.9) and comments made at that stage around this issue.
- 10. A number of evidence base documents to the <u>SLP</u> refer to the Sports hub proposal, including the Playing Pitch Strategy (3.88g) and the Open Space Study (3.88c) as well as the Local Football Facility Plan for Tunbridge Wells (3.136). Of particular relevance is the Tunbridge Wells Borough Council Site Options Analysis Tunbridge Wells Borough Council Sports Hub 9 July 2020 (3.126). This sets out quite clearly, in its introduction that the site options analysis document makes recommendations on the

use of Council playing pitch sites across the council's urban area as identified in the Council's Playing Pitch Strategy and considers alternative sites that have the suitability, to provide a new stadia sports hub to serve the Royal Tunbridge Wells urban area. In its conclusion at Section 4 of the report, paragraph 4.1 states 'When considering the advantages and disadvantages in the site assessment Table 3.2 above, the most advantageous site is Site 5: Hawkenbury Recreation Ground and adjacent Plot A Hawkenbury Road, Royal Tunbridge Wells. This is based on the consideration of a number of factors, including site and planning constraints, other suitable sized sites being considered for other more appropriate land uses within the Draft Local Plan or are topographically challenging when taking into account the specific site requirements of a stadia sports hub'.

- 11. As referred to above, following the Hearing Sessions, one of the questions that the Inspector sought greater clarification on was further detail of the proposed project this was in particular, the high-level details of the proposals, pitch configuration, parking, deliverability, financing and how the facility would be operated.
- 12. To aid the examination and the Inspector's consideration of the site, Section 2 of Action Point 13, Part 1, Part 2 and Part 3) provides further detail on the project. This is set out at paragraphs 2.1 2.5 of the Action Point. This document refers to the following;
- 13. The 'Hawkenbury Football Centre of Excellence Business Case Report March 2017 V7', which is appended to Action Point 13 Part 1, Part 2 and Part 3). This provides information on the evidence and background context for the proposal, identification of demand and the facility mix including layouts. The proposed facility mix is set out at Paragraph 1.15 of this document and is split into the Stadia Pitch facilities, new associated community facilities and consideration of the existing community facilities. This report at paragraph 4.76 refers to a 3,000 capacity spectator stadium. This capacity is anticipated to comprise a combination of seating and standing space.
- 14. Paragraph 4.75 of the Business Case Report, provides a breakdown of the current and proposed facilities for the hub site, including senior and youth pitches, mini soccer pitches, a cricket square, car parking, changing facilities and viewing area. An

- illustrative drawing is provided on page 32 of the Report, illustrating the layout mix for the proposed facility on the site, including a 2 storey stand.
- 15. An indicative timeline for the delivery of the project is provided, including the planning process, acquisition of the land and links to the sports hub approach and other identified sites within Royal Tunbridge Wells as part of the SLP.
- 16. It is considered by the Council, that the above information provided within the <u>SLP</u> itself and the supporting documentation makes it clear to users of the plan of the type and scale of development that is proposed for the site. Additional wording setting out the background to the project and the scale of development proposed has been drafted by the Council to be included in the supporting text to Policy AL/RTW 19. This is provided within **Appendix 1** of this hearing statement. However, if the Inspector feels that additional information should be provided within the Policy and the supporting text, the Council can suggest additional wording as a main modification to be agreed by the Inspector and consulted upon through the main modifications consultation, in due course.
- 17. The Business Case Report and Action Point 13 information provide detail regarding the site of the proposed facility in terms of its potential capacity. This is not referenced within the policy itself.
- 18. The expectations for the maximum number of spectators for the site in the long term, are wholly dependent on the progression of TWFC through the Football League pyramid. Currently the team are in the Southern Counties East Football League and the policy allows for ambitious progression. The Football Association set out guidance for 'Ground Grading' in its document 'Ground Grading Guidance for FA National League System Mens (Steps 1-6) (as amended)' [PS_082].
- 19.TWFC are currently in the Southern Counties East Football League at Step 5 on the FA Pyramid. The club would be required to step up 3 more leagues in order to be expected to have a ground with the demonstrable capacity of 3,000 people at Step 3 of the FA pyramid. The current Culverden Stadium (the subject of SLP site allocation Policy AL/RTW 20), which is currently the home to TWFC provides 250 covered seats (the minimum required at Step 5 / current level is 200 spectators covered /100 seated,

- and two levels above 500 & 250 respectively). Despite a capacity of 3,000 required for the next step / level of the Pyramid, covered, remains at 500 as does seating at 250.
- 20. In particular, the details of any proposed seated area will be determined at the planning application stage, the scale of which will be dependent on the progress as set out above, however it is anticipated that any future seated structure will be appropriately designed and be in combination with appropriate levels of standing in accordance with the FA guidelines.

Inspector's Question 2: [re: Safe and suitable access]

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?

TWBC response to Question 2

Introduction

21. As referred to in the Council's response to Question 1 above, following the Hearing session on the 21 June 2022, the Inspector confirmed that he required further information from the Council with regard to safe access and parking as well as other issues as listed at paragraph 4 above.

Consideration

Access and Road Widening

- 22. Action Point 13 (Part 1, Part 2 and Part 3)sets out further detail at Section 4: Access and Road Widening, how appropriate access can be provided to the site.
- 23. Officers of TWBC had discussions with officers of KCC Highways to consider and ensure that a safe and suitable means of access to the site could be achieved. It was concluded and agreed by both parties as referred to within Action Point 13 (Part 1, Part 2 and Part 3) that in order to provide a safe and suitable means of access for the site, some localised road widening along High Woods Lane would need to be achieved in order to accommodate traffic movements associated with the proposed use. This is particularly the case for buses and coaches.
- 24. Appendix 3 of Action Point 13 (Part 1, Part 2 and Part 3) provides an indicative plan which seeks to demonstrate that the access and road widening is achievable along High Woods Lane to the access point of the site, with an indicative 6 metre wide carriageway width proposed. It is also noted that the allotments which run parallel to High Woods Lane are within the Council's ownership (although leased to the Hawkenbury Allotment Holders Association) and therefore any limited road widening which would require the re-configuration of the existing incidental parking spaces along the road frontage as necessary can be facilitated.

- 25. The lease with the Trustees of the Hawkenbury Allotment Holders' Association expires in December 2029. It includes a clause which allows for the termination of the lease if vacant possession is needed for whatever reason. It is noted however, that in practice the council would first seek to negotiate with the Trustees, to enable delivery of the road widening and re-configured parking provision which in the context of the Allotments site is fairly minor in scale. These works are set out in the Action Point 13 Part 3 and would include the formalisation of car parking spaces on the north side of High Woods Lane which currently uses the verge adjacent to the allotments in an informal way.
- 26. The plans also illustrate how the informal parking arrangements along High Woods Lane for the allotments can be reconfigured and appropriate passing points achieved where necessary. Again, this would be subject of detailed design consideration as part of any planning application and subsequent delivery of the site.
- 27. As part of the discussions with KCC, it was important to consider the intensity of the use proposed, the scale and the impact on the access arrangements as well as the local highway network in this part of Royal Tunbridge Wells. Although a 3,000 maximum capacity seat stadium, is referred to, this is considered to be an absolute maximum capacity for the site and any wider community use rather than the size of the stand itself and was necessary for KCC to consider the possible potential impacts. It is recognised by both parties that this is the overall aspiration of the Tunbridge Wells Football Club (TWFC) (who it is envisaged would be the main use of the stadium pitch, although it will be available for other clubs to use), which would be incremental, dependent upon the progression of the football club through the football league and appropriate triggers could be added to the policy wording as appropriate.
- 28. Following discussions with KCC, it has been concluded that the road widening is considered achievable at this stage subject to detailed design considerations at the planning application stage and that the wording of Policy AL/RTW 19 should be amended to strengthen the policy in respect of the above. Additional wording has been agreed with KCC Highways (which is referred to within Action Point 13 (Part 1, Part 2 and Part 3 and will be referenced in the SoCG within KCC Highways to be updated ahead of the Stage 3 hearing session) and is included within Appendix 1 of this statement.

Parking Requirements

- 29. Section 5 of Action Point 13 (Part 1, Part 2 and Part 3) provides further detail about the Parking Requirements of the proposed scheme. Again, Appendix 1 of the Action Point provides further detail, as set out at paragraphs 4.76-4.82. This refers to the quantum of parking spaces required for the number of spectators anticipated and sets out options for on-site and off-site provision. It is considered that 200 car parking spaces would be required and that 150 is achievable on the site, with options for a further 50 to be provided within the locality. Again, the maximum spectator capacity of 3,000 spectators has been considered, but it is recognised that this would be a maximum and that the usual number of spectators would be far lower the document refers to the average current number of spectators at Culverden Stadium being around 300.
- 30. Officers of the Council have also discussed the parking arrangements with officers of KCC Highways and it has been concluded that detailed discussions on the parking provision would need to be considered at the planning application stage to reflect the scale and nature of the proposals coming forward.
- 31. Again, KCC Highways have provided some suggested wording in relation to parking and provision of overspill parking which is provided within Appendix 4 of Action Point 13 (Part 1, Part 2 and Part 3) and will also be further referenced in the updated SOCG to be agreed with KCC Highways ahead of the Stage 3 hearing sessions. This is set out within the proposed modifications to Policy AL/RTW 19 at **Appendix 1** of this statement.

Inspector's Question 3: [re: Site deliverability]

Does the additional information demonstrate that the site is deliverable?

TWBC response to Question 3

Introduction

- 32. In terms of the deliverability of the site, a number of factors can be taken into account

 including the suitability and availability of the site as well as the viability of the proposed scheme.
- 33. The Councils Hearing Statement TWLP/037 Matter 7 Residential Site Allocations, Issue 1: RTW and Southborough (Policies STR/RTW1 and STR/SO1) (TWLP_037) that formed the Stage 2 Hearings and the discussion around this site set out the considerations in relation to the deliverability of the proposals under the Inspectors Question 42 'How will the relocation of Tunbridge Wells Football Club be achieved?' Are the allocations deliverable, and thus, is the Plan effective?'

Consideration

- 34. The previous statement sets out that it is acknowledged that the Council do not own the site, that the Council may need to use its Compulsory Purchase Order Powers to purchase the site and bring forward the development and that funding for the proposal would come forward from the capital receipts of the sale of a number of other sites as part of the 'Sports Strategy' approach.
- 35. Following the Hearing sessions, Action Point 13 (Part 1, Part 2 and Part 3), was produced by the Council which at Section 3, provides information on the High Level Costings associated with the proposed scheme. These are provided within Appendix 1 (Hawkenbury Football Centre of Excellence Business Case Report March 2019 V7) of the Action Point. Section 5 of the Business Case Report details the business case for the Sports Hub project. Additionally, as referred to Action Point 13, the Council's Director of Finance and Development has confirmed that if there is any shortfall in funding, the Council would seek to bridge any gap to fund the project using monies from other sources, including Council reserves and/or other direct financing available to it such as the Public Works Loan Board.

- 36. Appendix 2 of Action Point 13 (Part 1, Part 2 and Part 3), also provides an indicative estimated timeline for the delivery of the project. This factors in key milestones including the planning process, acquisition of the land/possible CPO and the build put programme. This demonstrates the deliverability and timeframes for the development and also how it ties in with the consideration and development of other sites allocated within the SLP as part of the 'Sports Strategy' approach (AL/RTW 20 Land at Culverden Stadium, Culverden Down, AL/RTW 21 Land at Colebrook Sports Field, Liptraps Lane and AL/RTW 22 Land at Bayham Sports Field West).
- 37. Since the Stage 2 Hearings and the subsequent production of Action Point 13 (Part 1, Part 2 and Part 3), the Council's property team has continued to liaise with the owners of the site, in order to pursue an option agreement with them to purchase the site. An agreement has yet to be made, however, the Council will continue to engage with the owners before determining whether to implement its Compulsory Purchase Order powers.
- 38. Additionally, the Council's Leisure team has continued to engage with TWFC to understand the clubs needs and aspirations over the Plan period to ensure that the proposals meet their requirements, and the site is delivered in the way envisaged.

Inspector's Question 4: [re: Modifications to Policy AL/RTW 19] What changes (if any) are necessary to Policy AL/RTW19 to ensure that the Plan is sound?

TWBC response to Question 4

Introduction

- 39. As referred to within the responses to the Inspectors questions 1-3 of this statement in relation to this site, the Council is proposing to make a number of modifications to the supporting text and the wording of Policy AL/RTW 19. It is considered by the Council, that these changes will assist users of the plan in understanding the type and scale of the development proposed as well as ensuring that the appropriate mechanisms are in place to guide the development.
- 40. The suggested changes are included in **Appendix 1** to this statement and the key proposed amendments are summarised below;
- Wording added to the supporting text at paragraph 5.118 to refer to the background to the proposals, the 'Sports Strategy' and the 'Sports Hub' approach as well as further details of the proposals.
- Additional wording added to the policy criteria at criteria 2, 3 and 4, in relation to the
 access, localised road widening and the requirement for a detailed transport
 assessment, as well as the requirement of measures to facilitate and promote public
 transport and other sustainable transport journeys as part of a comprehensive
 traffic/event/car parking Management Plan. These amendments have been discussed
 and agreed with KCC Highways.
- Suggested changes have also been proposed for criteria 6 and 7 to strengthen the
 policy in regard to the sites location within the High Weald National Landscape
 (formerly AONB) and limiting any impact on its setting, the landscape and also the
 adjacent ancient woodland.
- Further detail has also been added at criteria 10 of the policy in relation to contributions towards a corridor study with a view to improving active travel infrastructure in the local road network, particularly the A264 Pembury Road.

41. It is considered by the Council that the proposed amendments are acceptable and should be the subject of the main modifications consultation.

Conclusion

- 42. Following the conclusion of the Hearing sessions in 2022, the Council engaged with the Council's Sports and Leisure Team, the Council's property Team and KCC Highways in order to produce Action Point 13 (Part 1, Part 2 and Part 3), which sets out further detail on the proposals as requested by the Inspector. These primarily relate to the type and scale of the proposals, the access and parking arrangements, the deliverability and costings and the proposals relationship with other sites within Royal Tunbridge Wells being promoted as part of the 'Sports Strategy approach. Much of the content of the Action Point is provided within this hearing statement in response to the Inspectors Stage 3 Hearings, questions in relation to this site.
- 43. A number of suggested amendments have been proposed by the Council, to Policy AL/RTW 19 in order to assist users of the <u>SLP</u> and aid clarity on the proposals. These are detailed in **Appendix 1** of this Hearing Statement and are summarised at paragraph 48, 49, and 50 above.

Appendices

Appendix 1: Proposed amended policy wording to AL/RTW 19 – Land to the north of Hawkenbury Recreation Ground

Submission Local Plan

Section 5: Place making policies

Royal Tunbridge Wells

Land to the north of Hawkenbury Recreation Ground

The site is located adjacent to the existing LBD of Royal Tunbridge Wells, to the south of the town centre. It is currently an undeveloped site.

The existing Hawkenbury Recreation Ground, which consists of formal and informal open space, playing pitches, a children's play area and astro-turf pitch with flood lighting, lies to the immediate south/south-east of the site. There is an indoor bowling centre to the north of the site with parking, with residential development to the west and further south, including the new Hollyfields development currently under construction, and a new primary school.

The Playing Pitch Strategy (PPS) prepared on behalf of the Council looks in detail at the existing provision of sports pitches, the quantity, quality and configuration for providing for the future population, taking into account housing and population growth and demographics. The 'Strategy' and 'Action Plan' set out within the PPS considers the rationalisation of some of the existing underused or poor-quality football pitches and the reprovision to create a new quality sports hub to serve the urban area. The strategy has been endorsed by Sport England and involves the re-provision of sports pitches from Culverden Stadium, Bayham West and Colebrook Sports Field, to be re-provided at a new 'sports hub' at Hawkenbury, offering two senior pitches (one of which to be 4G/Stadium quality), three youth pitches and one mini pitch.

Vehicular access into the site is currently through a field gate from High Woods Lane and any proposals coming forward for the site will need to widen and enhance the High Woods Lane access, as well as mitigate the impact and contribute to junction improvements within the local area to accommodate additional traffic in relation to the proposed use. As part of any scheme, improved pedestrian, horse, and cycle links and routes from the site to the wider town and to Pembury should be explored in order to facilitate non-motorised trips to the new sporting facility.

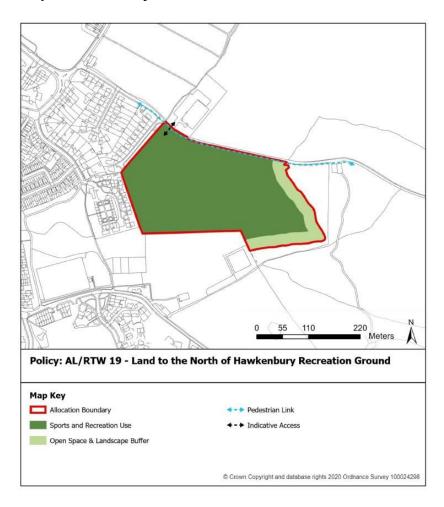
The site was released from the Green Belt in order to facilitate the provision of a sports hub. The Development Strategy Topic Paper and Green Belt studies set out the exceptional circumstances and compensatory improvements to the remaining Green Belt to justify the changes to the boundary in this location.

The site is also within the High Weald AONB, it is an assart field, and lies adjacent to ancient woodland. Therefore, any proposals for the site will need to be informed by a detailed landscape and visual impact assessment, and historic landscape, archaeological, and arboricultural assessments, in order to minimise adverse effects on the site and the surrounding landscape.

The site is allocated within the Site Allocations Local Plan 2016 (Policy AL/RTW 30) and was previously allocated within the Adopted Local Plan 2006 for sports pitches and other outdoor recreation facilities. Planning permission was granted in 2017 for the change of use of part of the land to expand existing recreational facilities through the provision of additional sports pitches, together with access, car parking provision, ball stop fencing, changing room facilities and other works. This site was granted planning permission under 21/00300 for 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 (21/00300/FULL) (this permission expired in April 2024).

This site allocation takes this permission forward and in addition, seeks to enhance the area's provision of sporting facilities in the form of a new stadia sports hub, with a maximum capacity for up to 3,000 spectators to serve the wider urban area, as set out within Policy STR/RTW 1. The hub will primarily be used by sports clubs and leagues for training and match play, but also to provide activities and sports programmes for general community use to increase physical activity and wellbeing. Policy AL/RTW 19 sets out the framework for this proposal and includes detailed criteria around access, parking and the need for a Management Plan to control the future development and any impact on the local road network.

Map 19 - Site Layout Plan



Policy AL/RTW 19

Land to the north of Hawkenbury Recreation Ground

This site, as defined on the Royal Tunbridge Wells and Southborough Policies Map (Inset Maps 1a-1d and 2), is allocated for new and enhanced sport and recreation provision as part of a new stadia sports hub, to include standing/seating for supporters up to a maximum capacity for 3,000 spectators, other ancillary structures, and increased parking provision.

Development on the site shall accord with the following requirements:

- 1. Development is dependent on the football stadium relocating from the current Culverden Stadium subject to allocation Policy AL/RTW 20;
- 2. Access should be provided via a new <u>safe and suitable access</u> road into the site from High Woods Lane in the vicinity of an historical access opposite the indoor bowling club. Proposals should include localised widening of <u>Halls Hole Road and</u> High Woods Lane between the junction of Bayhall Road/Forest Road and the site

- <u>access</u> and <u>other</u> highway improvements as required <u>as informed by a detailed transport assessment,</u> to facilitate the additional traffic <u>and enable access by bus/coach</u>;
- 3. Improvements to the local road junctions and crossings within the immediate area, and to other traffic or sustainable transport measures; potentially to include the access junction with High Woods Lane, High Woods Lane/Halls Hole Road, Halls Hole Road/Forest Road, <u>A264 Pembury Road/A264 Calverley Road/Bayhall Road/B2023 Prospect Road</u>, Halls Hole Road/A264 Pembury Road (and/or contributions to junction improvement investigation/implementation on the A264 Pembury Road;
- 4. Provision of an overspill parking area <u>as well as measures to facilitate and promote public transport and other sustainable transport journeys within a comprehensive traffic/event/car parking Management Plan.</u> This should include consideration of match day green travel plans, match day marshalling and bus to railway provision should this be necessary. These details should be included within any proposals and demonstration that this can be achieved to the satisfaction of the Local Highway Authority;
- 5. The provision of improved cycle, pedestrian, and potential bridle way linkages within and beyond the site linking up with other Public Rights of Way, in particular with linkages to the wider town and via High Woods Lane to Pembury, as set out in the Local Cycling and Walking Infrastructure Plan;
- 6. Regard shall be given to existing hedgerows, and mature trees on-site, and the adjacent ancient woodland with the layout and design of the development protecting those of most amenity value, as informed by an arboricultural survey and landscape and visual impact assessment;
- 7. The layout and design of the scheme to give full consideration of any impact upon the High Weald Area of Outstanding Natural Beauty, <u>locating any built</u> development towards the western part of the site, and the ancient woodland retaining land to the south east as a landscape and ecological buffer as indicated on the site layout plan <u>and should have regard to the Council's AONB Setting Report and the Landscape and Visual Impact Assessment.</u>
- 8. A scheme of lighting shall demonstrate that it would not cause an unacceptable impact on surrounding areas, including residential properties to the west of the site;
- 9. The provision of an archaeological assessment as part of any planning application;
- 10. Contributions are to be provided to mitigate the impact of the development, in accordance with Policy STR/RTW 1, including contributions to be used towards a corridor study with a view to improving active travel infrastructure, including bus journey times along the A264 Pembury Road. Once the corridor study is

complete, contributions shall be used to fund improvements arising from the outcomes/findings of the study.

In addition to the criteria in the above Policy, the relevant Policies that should be referred to in the Local Plan include: Policies EN 1: Sustainable Design; EN 5: Heritage Assets; EN 8: Outdoor Lighting and Dark Skies; EN 10: Protection of Designated Sites and Habitats; EN 12: Trees, Woodland, Hedges, and Development; EN 13: Ancient Woodland and Veteran Trees; EN 19: The High Weald Area of Outstanding Natural BeautyNational Landscape; EN 24: Water Supply, Quality, and Conservation; TP 1: Transport Assessment, Travel Plans and Mitigation; and TP 2: Transport Design and Accessibility.