

Alasdair Fraser
7 Grecian Road, Tunbridge Wells TN1 1TG
Stage 3 Representation on behalf of Tunbridge Wells Green Party

Submission to Stage 3 Hearing, TWBC Local Plan Examination June 2024

Matter 2 - The Strategy for Tunbridge Wells and Southborough

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

I am an allotment holder in the Hawkenbury Allotments, as well as an active member of the Tunbridge Wells Green Party, and I am not convinced the "stadium and sports hub" proposal is sound.

My concerns below are listed in answer to three of the Inspector's questions on page 3 of Matters, Issues and Questions for Stage 3.

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

A1: The site proposed in AL/RTW19 will not be big enough to accommodate all the planned number of pitches, along with all the supporting provisions that user parties will need.

Given that the requirement is to replace 11 pitches (not all full-sized) from Bayham West where TW Forresters play, a full-sized pitch from Culverden Down (TWFC), and two pitches (one full-sized) from Colebrook Recreation Ground, I was very concerned that it was not feasible to accommodate all that capacity in the site shown in the AL/RTW19, especially bearing in mind the stated need to terrace the pitches on "platforms" to produce flat playing surfaces on this sloping site.

My belief was confirmed by TWBC's note in response to Action Point 13 of the Inspector's Initial Findings. The diagram on page 32 of Appendix 1 of TWLP_092 showing the "Hawkenbury Football Centre of Excellence", shows only six pitches on the AL/RTW19 field, and another five on the existing Hawkenbury Recreation ground, ie instead of the two existing pitches (one full-sized) there. The diagram also shows use of the hedged-off former bowling green situated in the eastern corner of the recreation ground.

I have not been able to find any reference to this extension of the hub in the main texts of TWLP_092.

Extending the hub in this way would make the existing entrance and carpark on Hawkenbury Lane an additional entrance to the hub, affecting the many residents along that well-used road from Forest Road, which earlier goes past the entrances to the new estate to the south, and recently-opened St Peter's Primary School.

Hawkenbury Lane is effectively a cul-de-sac after the Hawkenbury Recreation Ground carpark (it then becomes a lane serving some rural houses), and there would be ongoing risks to residents and their families from cars exploring for parking at busy times, and turning round in frustration when unsuccessful.

Again, I have not seen evidence in the main texts that this aspect of the proposed hub has been investigated.

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?

A2a: High Woods Lane

The diagram of High Woods Lane in Appendix 3 of TWLP-092 shows a "shuttle give way scheme proposed to regulate traffic past the pinch point" just before the site entrance.

What is doesn't mention is that the "pinch point" is formed by large trees on both sides of the road, of which one is a very large oak tree, whose branches extend across the road, and would risk being hit by coaches.

This is a very significant constraint on movements to and from the hub.

On a weekday afternoon in May I counted 23 cars parked in High Woods Lane, with space for 8 more in between; the Phase 1 allocation (ie without cutting back the hedge) shown in Appendix 3 is for only 9 spaces, and Phase 2 (with hedge-cutting and incursion into the allotments) would increase this to 19, which is clearly not enough for allotment holders' needs.

A2b: Surrounding roads

The suggested amended Policy AL/RTW19 (Appendix 4 to TWLP-092) includes wording about roads to be changed further from the hub, and in particular mentions the junction of Halls Hole Road and Pembury Road.

At the moment Halls Hole Road is a very narrow lane, with sandstone walls that constrain use to the few cars and vans that are willing to risk side damage in return for a short-cut from the A21 to the south side of Tunbridge Wells.

If, however, the steps to improve traffic access to the hub were to involve widening of Halls Hole Road, this would have the significant side-effect of creating a *de facto* "Tunbridge Wells South Circular" linking A21 traffic to and from the A26 Crowborough Road via Halls Hole Road => Forest Road => Broadwater Down, all of which are residential roads not meant for that use. 100% clarity is thus required from TWBC that implementation of the football hub proposal would not involve widening of Halls Hole Road.

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

A4: The publicly-available documentation on this proposal feels unbalanced, being a mixture of detailed pitch strategy documents in the beginning (2015-2017), and then (varying) conceptual documents included in the wider Local Plan portfolio from 2021 to date. Affected residents and allotment holders are not sure about what is really proposed to be implemented, and what the impact will be on them and their nearby nature.

These stakeholders have already seen impacts from the housing developments to the west of them, (for example in the drying out of the stream crossing High Woods Lane, and problems with the capacity of the sewage pumping station), and many see this proposal as further "urban creep" into the Green Belt and AONB nature along the southern boundary of Tunbridge Wells.

The points I have made in A1, A2a and A2b above show these concerns are valid; a development that at first sight looks like "a simple open field" is in fact significantly constrained when the details are looked at.

I believe the open issues contain too many risks to allow the proposed hub development to be considered sound.