



South Willesborough and Newtown Community Council

Trade Unit 8

Invicta Business Centre

Monument Way

Ashford

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Team Leader - Strategic Development & Delivery  
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Planning & Development Service

**16.4.2026**

**Newtown Railway Works, Ashford, Kent Planning Application Reference PA/2026/0171  
and PA/2026/0229, Newtown Railway Works, Newtown Road, Ashford, TN24 0PN.**

I am writing to make you aware of the strong objections that South Willesborough and Newtown Community Council and the wider community have regarding this unacceptable proposal.

As you will be aware the planning application has generated considerable opposition from many local residents and some statutory bodies. Planning objections that we fully support and endorse.

While sympathetic towards the desire to sensitively and comprehensively bring the site back into beneficial use, we strongly object to this application. It is over development, does not represent sustainable development and it not in accordance with national and local planning policies. It would cause significant harm to important heritage assets, local infrastructure and the well-being of the local community (as well as the proposed occupiers).

For these and other important reasons it should be refused.

Turning to the main reasons why we consider it should be refused in more detail.

### **Significant harm to important Heritage Assets**

It is without exaggeration to say that the site, in the context of historic environment and history of Ashford (especially its railway heritage), is unique and irreplaceable and could be quite rightly described as **“the epiphany of the Towns heritage”**.

That it is of national significance is not in doubt, as reflected in that it contains six designated Listed Structures, including the landmark railway sheds and clock tower and gatehouse



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(which is the subject of a separate but related planning application). It also contains locally significant heritage assets and the potential for important archaeological remains.

While we recognise and support the efforts of the applicant to conserve these assets and their setting, they do not go far enough, by a wide margin, to make the proposal acceptable in planning heritage terms.

The impact of some of the proposed elements of the development would be to fundamentally alter, and irrevocably lose, significant elements of this important heritage. In particular, the use of inappropriate materials, development in spaces that are important for the setting of designated assets and the loss of important views as well as the height and massing of some of the buildings.

There is a general lack of special attention and respect to the important heritage value of the site, and in our opinion cannot be described as a conservation led approach to the conservation and enhancement of the site.

It would cause a high level of harm to the significance of the heritage value of the site including the several designated and non-designated heritage structures and their setting. In a broader sense, the significance of Ashford (as an historic place with a proud railway heritage) – not just those aspects covered by designations – would also be harmed by aspects of these proposals.

As such it is contrary to national and local planning policies. This includes the National Planning Policy Framework ('NPPF'), which places great weight on the conservation of heritage assets (paragraph 212), makes it clear that any resulting harm requires a clear and convincing justification (paragraph 213) and where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent excepted in specified circumstances (paragraph 214).

Can we also add that while we welcome that the Monument and Memorial Plans are presented as drafted by Mr Gerry Clarkson CBE are to be incorporated into the scheme, we are concerned that there is no certainty in the proposal where they will be located or indeed implemented. They should form an integral part of the proposal. Should the council be minded to grant the planning application, we would urge that a planning condition or similar be included covering the appropriate siting of this Monument and Memorial Plans.



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### **It is Not Well Designed**

Paragraph 135 of the NPPF stipulates that planning decisions should ensure that development functions well and adds to the overall quality of the area, not just in the short term but over the lifetime of the development. In addition, the NPPF set outs that development should establish a strong sense of place. It also requires that development should optimise the potential of the site to create places that are safe, inclusive and accessible.

Paragraph 139 of the NPPF states that “Development that is not well designed should be refused”.

Policy SP6 of the Ashford Local Plan requires that development proposals must be of high quality design and demonstrate a careful consideration of and positive response to each of the specified design criteria. In addition, that they must show how they have responded positively to the design policy and guidance and amongst other things, site specific development briefs.

We contend that the proposal is not of high quality design and should, therefore, not be supported.

Its design raises multiple concerns. Just to name a few examples. The height, including the six-storey structure, and massing of some of the structures is excessive. It does not safeguard the privacy and outlook of nearby properties, especially the six-storey structures, which will overlook properties on Newtown Road and impact residents’ amenity and views. The number of dwellings and the scale of the development is considered too excessive for the site. It fails to respect the character and heritage of the local area.

In assessing its design impact, it is also important to consider its impact on the proposed occupiers. The proposal is deficient in this regard. It is simply too cramped to provide adequate living conditions for future occupiers, not only in terms of floorspace but also private and communal space, especially green spaces.

Also, insufficient regard has been given to ensure that it functionally and physically integrates to the wider area. The design should offer an inclusive approach that provides



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equality to the whole community, reflecting the local spirit of South Willesborough and Newtown, which it does not.

### **Woefully Inadequate Affordable Housing Provision**

We consider that the development does not make adequate provision for affordable housing.

That there is a chronic shortage of affordable housing in Ashford is evident and well documented.

Policy HOU1 of the Local Plan addresses the provision of affordable housing and sets a minimum housing target of 35% for house developments of ten or more homes (and on sites of 0.5 hectares or more). Adding that “All proposals are expected to meet their full affordable housing provision on-site”. Policy HOU1’s first criteria allows for “In the Ashford Town area\*, flatted development (including the proportion of flats provided on a mixed flat and housing scheme) will not be required to provide any form of affordable housing”. It is accepted that the site falls within the Ashford Town area.

However, paragraph 64 of the NPPF states that “Where a need for affordable housing is identified, planning policies...”expect it to be met on-site unless: a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and b) the agreed approach contributes to the objective of creating mixed and balanced communities”. We understand that the scheme shows that 5 dwellings would be available for affordable homes, a less than 1% affordable housing provision for a scheme of about 800 dwellings.

This is woefully inadequate, and in our view, enough to refuse planning permission in its own right.

The provision of virtually no affordable housing in an area of acute affordable housing and in what is likely to be one of the biggest developments in the area for many years is wrong and unjustifiable least of all in planning terms.

We also contend that it is contrary to national planning policies that prioritise the provision of affordable housing especially in major housing developments such as this. In particular, criterion b of paragraph 64 the NPPF with its emphasis on that the agreed approach should contribute to the objective of creating mixed and balanced communities.



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Regard should also be had to the adoption of the Local Plan predates the publication of the latest NPPF and as such planning rules require that more weight should be placed on the provisions of the later more up to date planning document.

While we accept there may be some exceptional costs associated with the development's build out, we do not accept that they would be so unduly high for the area that they would not support a much higher provision of affordable housing.

### **Weak and Flawed Community Engagement**

We do not consider that the applicant has proactively engaged with the Community Council and the wider community in the plan preparation process. Further, where engagement has taken place, it has been weak. To give one good example of this. In discussions between the applicant and the Community Council concerning the statement of community engagement it was agreed that the response to the application should include that at the November 2025 meeting the plans were not presented only discussed in a verbal report - as a change from Film and Media to Housing and the development of plans on this basis, a change which was not made. As such the scheme does not fully reflect their aspirations for the development.

While it is recognised that the Community Council was formed in 2019 and pre-dates some of the detailed discussions about the use of the site, nonetheless the applicant has had ample time in which to meaningfully engage with it.

This is a significant flaw especially given the scale and significance of the proposal. It is also contrary to good planning practice and local and national planning policy guidance.

This includes the Local Plan with its emphasis on "By building a consensus with the community and other stakeholders they create greater certainty for investors with the cost savings that implies." (para 2.169). Also, the NPPF, which states at paragraph 40, "Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre- application discussion enables better coordination between public and private resources and improved outcomes for the community".



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### **Adverse Impact on Already Stretched Essential Community Facilities and Infrastructure**

There is already a serious issue with essential infrastructure and community facilities provision in the local area, many of which are already struggling to cope with demand. There are already well documented and acknowledged issues with the capacity of doctor's surgeries, schools, hospitals, roads and sewerage.

While the proposals include the provision of some improvement to address this, these are sketchy and we consider are grossly inadequate to meet the infrastructure needs generated by this huge development.

We are deeply concerned that if approved it would overwhelm, often already stretched, essential community facilities and infrastructure.

### **Out of Scale**

Closely related, at over 800 dwellings, this would be a significant increase in scale, particular in the context of the scale of expansion in housing and other forms of development that the local area has already undergone in recent years.

While we are willing to accept in principle the scale of development proposed for the site as articulated in the Local Plan, this proposal, however, is much larger, than this, particularly in respect of the plans for the locomotive sheds. It is grossly out of scale with the local area and its limited services and infrastructure, and would result in significant harm to local character, distinctiveness and general quality of life.

It should be stressed that the Community Council is not opposed to new house building as well as other forms of development. Far from it. The local area has already experienced significant house building in recent years with more in the pipeline (including the original plans for the site as articulated in the Local Area). Indeed, it is considered that the local area has already made its proportional and sustainable contribution to meeting housing supply. There are already concerns about the adverse cumulative impact these developments will have on the character, sustainability and services. The new proposal is too much. It represents over development and is grossly out of scale and disproportionate with the local area.



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### **Unacceptable Impact on Highway Safety and on the highway Network**

The Community Council has commissioned its own independent transport assessment of the highway implications of the proposal by respected highway consultants Aprica Ltd. This report, which forms an integral part and must be read as part of the Council's submission, provides comprehensive and compelling advice that the proposed development is woefully inadequate in highway terms and should be refused on these grounds alone. It also shows that the transport related evidence provided by the applicant in support of the proposal is deficient and lacking in several key respects. As the report states in its conclusions and its recommendations:

#### **"Conclusions**

- **Kent County Council (KCC)** states that there is an *"unacceptable impact on highway safety on the highway network"*. This is a view shared by Aprica.

**KCC** requires *'a full and robust transport assessment'* and states that *'they are unable to support the application in its current form due to significant deficiencies in the submitted TA; They cannot conclude that the proposal would avoid an unacceptable impact on highway safety on the highway network; the Transport Assessment does not currently demonstrate that the proposed development would avoid an unacceptable impact on highway safety given the significant parking shortfall; reliance on low car ownership is not evidence-based and current car ownership levels within the Newtown area are much higher than that suggested; The suggested provision is much lower than the previous planning permission on the site; The applicant needs to undertake a robust assessment compared to existing car ownership levels in the 2021 census; There is under-provision of on-site car parking with a high risk of overspill onto surrounding streets; No strategy for further parking restrictions on residential roads surrounding the site has been submitted; Detailed plans need to be submitted showing proposals for on-street parking restrictions (fundamental to make the development acceptable from a highways perspective). Lack of detail as to how the proposals are compliant with Local Transport Note 1/20 for the existing footways along Newtown Road; Lack of commitment to upgrade the existing bus service along Newtown Road; Travel Plan measures lack enforceability and require strengthening; There is no modal share targets submitted within the Travel Plan including targets for reduce private vehicle usage out of the site; As submitted, the Transport Assessment does not provide a sufficiently robust evidence base for a development of this scale; KCC H&T currently **objects** to the application'.*



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Rarely does a Council's Highways Team submit such a critical response and in many respects the response is refreshing to read. Aprica agrees with all KCC's comments and echoes many of them.

- **Active Travel England** *'raises concerns about the adequacy of transport planning, particularly regarding prioritisation of sustainable modes'* and states that *'the applicant has not demonstrated sufficient infrastructure prioritisation or detailed assessments of off-site facilities'*; *'relies on outdated planning approaches'*; *'Newtown Road currently lacks compliant cycle infrastructure and safe crossings'*; *'the proposal ... lacks adequate provisions for cyclists and pedestrians at multiple access points, with concerns about connectivity, safety, and directness of routes'* and concludes that ... *"The applicant is advised to revise transport assessments, develop detailed infrastructure improvement plans, and work with authorities to secure necessary funding and contributions, ensuring the development maximizes sustainable travel opportunities and aligns with policy frameworks.* Aprica agrees with the ATE comments.
- The access proposals severely lack provision for pedestrians and cyclists, and in some cases are felt to increase vulnerability, particularly for cyclists.
- Existing walking and cycling facilities are poor, as is the one, limited, bus service. Pedestrians are not well catered for and the cycle facilities and bus stops are inadequate and nowhere close to current standards.
- Some of the highway works seem excessive even for the claimed benefits, and could have a significant adverse effect on congestion, pollution and the existing local residents' enjoyment of their locale.
- The suitability and effectiveness of the proposed highway works, the ratio of parking spaces to units, and indeed the acceptable number of units themselves should be re-considered. Alternatives should be explored with a view to improving road safety, connectivity and sustainability, whilst possibly value-engineering the proposals to better use available funds including Section 106 monies.
- A concerning number of recorded injury collisions have occurred in the most recently recorded five-year period. Bearing in mind the number, and likely unrecorded collisions, this is something that needs to be taken into consideration when deciding on the suitability of the



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highway measures proposed. The lack of similarity of the current application to the previously permitted, extant, application should also be considered.

- If sustainability is to be achieved, far more needs to be done to make walking, cycling and bus travel more accessible, attractive and safe.

For a development of this size, the application is weak and incomplete. There are numerous improvements that should be made to the proposed highway works, which make little or no effort to encourage genuine sustainable modes of travel or provide walking/cycling links to the application site.

The existing highway network is poor and outdated where pedestrians, cyclists and bus users are concerned. The application proposals need to be linked to improvements in the wider area if people are to be encouraged to walk, cycle or take the bus.

It is suggested that the RSA 1 (should it have been carried out) be reviewed or repeated whenever any revised, more detailed, application is made. The RSA2 (detailed design stage) should provide the technical confirmation that the proposals minimise the risk of occurrence and severity of collisions. The outcomes of the RSA should be secured by planning conditions.

### Recommendations

Based on Aprica's assessment of the highway proposals to date, together with the evidence of the existing highway conditions in the area and the very low likelihood of better and increased sustainable travel, it is Aprica's considered opinion that this Planning Application should be refused.

It is recommended that the Applicant be required to review and revise their entire proposals, with a view to scaling back the proposed development to something that is far less likely to create overspill parking, revise the proposed Highway Works to make safe, sustainable travel more attractive and more achievable. Proposals for safe and sustainable travel should be expanded to cover the wider area so that there is connectivity to the application site. The ratio of residential, commercial and visitor parking should be much closer to Kent County Council and Ashford Borough Council's Policy figures. Any associated Travel Plan should be robust and enforceable with a monitoring and measuring process agreed. All of these issues should be secured by planning conditions and monitored & enforced after completion".



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### **It Does Not Represent Sustainable Development**

National and local planning rules are clear that this should be at the heart of planning decision making.

As paragraph 7 of the NPPF states: “The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner”.

We strongly contend that the proposal does not represent sustainable development. This is for a variety of compelling reasons, many of which we have detailed earlier. These include adverse impact on heritage, air quality as well as essential facilities and infrastructure, poor design and is out of scale.

We would like to make special mention that it would promote unsustainable forms of transport movement especially by car.

National planning rules are clear that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes” (NPPF, paragraph 110).

A requirement the proposal fails to meet and by a wide margin, as clearly shown by the evidence submitted by the Community Council (including the associated independent transport assessment) and many others including Kent County Council Highways Team and Active Travel England.

As such it does not offer a genuine choice of travel modes nor encourage the use of sustainable modes of travel as required by national and local planning policies.

### **Crowbridge Old Millstream Bridge**

On Crowbridge Road there is a narrow hump-back bridge. It is understood that the planning application is subject to a structural and operational upgrade of the bridge, to include removal of the current 7.5 tonne restriction and strengthening to support more modern 40 tonne vehicles. SWANCC was advised an independent structural check would be carried out by KCC’s Bridges Department however the outcome and arrangements following this survey have not been reported back to SWANCC.

The Bridge is very old structure and not designed for the weight and volume of traffic this development proposes, both in construction and occupation. Should it fail, it would be

disastrous both in isolating the existing residential area, the flow of traffic throughout the town. This concern is supported by the requirement within the Local Ashford Plan for under Policy SP6 to review this for quality design and permeability in use.

Further concerns are raised as to the inadequacy of the proposals to improve the access challenges created by the Old Millstream Bridge as detailed by Aprica Ltd

“There is a proposal to signalise (for formalised single-way shuttle working) the bridge and incorporate a new footway along Crowbridge Road. It is understood that there is a requirement to review this location under Policy SP6 of the Ashford Local Plan 2030, for quality design and permeability in use. The carriageway over the bridge is narrow - single way working - and there are no footways, the footway on the north-eastern side terminating before the bridge. The proposal is for ‘signalisation of the Crowbridge Road bridge and provision of new footway along Crowbridge Road’ (condition 27 of the extant planning permission).

The proposal is to extend the north-eastern footway over the bridge, reduce the carriageway width, and provide a signalised pedestrian crossing to connect with the existing footway on the opposite side near Gladstone Road. A one-way system (into Gladstone Road only) is proposed to prohibit exiting traffic and allow entering vehicles to clear the junction.

Whilst on the face of it this proposal is beneficial to pedestrians, there is little connectivity particularly for those on foot travelling north-westwards towards the application site. There is no footway on the south-west side beyond the bridge (in the direction of the site), and the footway on the north-east side is narrow and partially overgrown. Pedestrians heading north-west towards the site would therefore have to cross from the south-western side footway to the new footway on the north-east, either at the existing controlled crossing near Samuel Peto Way or the proposed one at Ellson Close (or indeed ‘uncontrolled’ near the Old Mill Stream footpath where the south-western footway is better), then cross back across Newtown Road to enter the development. This is tortuous and highly un-pedestrian friendly, and seems to be a weak attempt to improve connectivity.

For any cyclists the proposal is disastrous. The design makes an already hazardous section of highway even more hazardous. There are no efforts to cater for cyclists, in fact it is actually proposed to prohibit cyclists from traveling south-eastwards on Crowbridge Road, forcing them onto Mead Road and back up Gladstone Road to rejoin Crowbridge Road by turning right across the two lanes of traffic. This is certain to deter cycling rather than encourage it, and should not be allowed. Cyclists, riding south-eastwards, would need to travel nearly 400 metres along residential streets with parked cars etc to negotiate, instead of 135 metres in a straight line. To all intents and purposes it is an anticycling measure.



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### **Samuel Peto Way, Harold Way, Kirtley Way, Ellson Way.**

As discussed by Aprica Ltd in the assessment of the Highways - The Access is proposed, from the existing highway network, via Samuel Peto Way where it is then proposed to create 34 parking spaces within the development. The earlier planning application (film/hotel/housing) apparently did not show a need for this access, yet it is now proposed despite the claim that the current proposal requires a minimal number of spaces 'per unit'. Current arrangements on Samuel Peto Way/Ellson Close and Harold Way are a mix of formal parallel and perpendicular parking, leaving the carriageway clear for traffic and occasional short-term parking for deliveries etc. There are already reports of long-term parking by non-residents seeking convenient free parking. Notwithstanding the significant (in terms of additional compared with existing) additional 'through traffic' accessing the development, **it is highly likely that one of the first places to attract overspill parking would be Harold Way/Ellson Close and Samuel Peto Way, adversely changing the entire 'feel' of this relatively quiet residential area.**

Policy SP7 of the Ashford Local Plan 2030 'resists the coalescence of two or more separate settlements' or 'erosion of a gap between settlements'. Arguably the Samuel Peto Way/Harold Way/Ellson Close area, and the Alfred Road & Turner Close areas are settlements separated by Newtown Road, and therein lies a conundrum in that whether the proposed pedestrian crossings would coalesce the settlements, or indeed the additional traffic would erode the gap, in either case the development would come under the scope of Policy SP7.

### **Community Safety**

There has been insufficient regard to, and arrangements, to address community safety generally and for specific groups, including, and of no less importance is the prevention of **violence against women and girls and the prevention of crime.**

Safety must be achieved by design and every sustainable and possible effort must be made to ensure adequate lighting throughout the development. **The lighting plan item 11.12 demonstrates a lack of lighting at Samuel Peto Way end of the development and the circulating the new blocks proposed within the development, just to provide one good example why the plans are deficient in this respect.**



Safe sustainable parking to prevent not only the aforementioned overspill of 500 cars but also the potential conflict that can arise due to disputes over location and lack of parking, which also impacts the safety of Women and Girls.

The size and design of cars has increased in the development of new model cars, particularly electric vehicles, the lack of parking spaces able to be included in the design plans as it stands only evidences this road width, parking spaces and turning areas must be able to accommodate the vehicles owned by the future residents of this development with suitable capacity and access for Emergency vehicles to able to respond accessibly and safely to the development.

SWAN Community Council also notes with grave concern that up to the date of agreeing its response to these planning application, that Kent Fire and Rescue have not yet commented on application PA 2026 0229.

Kent Fire and Rescue's response to PA 2026 0171 notes no buildings over 18m and their arrangements would respond on this basis, however the elevations for Locomotive Sheds are not only way above 18m but also above the height of the previous application CONSENTED PLANNING RIDGE LINE. In the absence of a response from Kent Fire and Rescue on such an important matter the planning should not be determined.

Also, it is unclear with application PA 2026 01717 if the buildings which reference a height of 22m at its peak, include a below ground level therefore they do not exceed 18m or if they in fact do exceed this height and there is possibly a conflict between the Design and Access Statements and the Drawings. The safety and wellbeing of its residents both now and in light of the development is foremost in the priorities of SWANCC and this needs to be addressed.



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### **Noise and Vibration**

Similarly, there are strong concerns which the Council has received, considered and support these would include concerns that the impact of noise and vibration from the Highspeed and Railway service adjacent to the proposed properties which would adversely affect the quality of living for the potential new residents.

For these and other compelling planning reasons SWANCC strongly urge that both **Planning Application Reference PA/2026/0171 and PA/2026/0229, Newtown Works** should be refused. Please note attached with this letter is a copy of the report by Aprica Ltd commissioned by SWANCC as referred to in this letter.

Yours sincerely,

*Sue Mullan*

Cllr Sue Mullan

Chair

South Willesborough and Newtown Community Council

Encs Report Aprica Ltd.