

Submission 47-1

To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?

4.0 Paddock Wood strategic growth

Which part of the plan does your comment relate?

Paragraph

What is the reference number?

4.59 and 4.60

Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it:

Yes No

Legally Compliant Not Selected Selected

Sound Not Selected Selected

Please give details of why you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 - 2038)(as set out in the Development Strategy Topic Paper Addendum) are not legally compliant or are unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) (as set out in the Development Strategy Topic Paper Addendum) please also use this box to set out your comments.

- The NPPF Paragraph 31 states that "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence." The Paddock Wood Strategic Sites Addendum paper which informs these amendments has not been backed up by up-to-date evidence. Sport England have continued to encourage Tunbridge Wells to prepare an updated Playing Pitch Strategy (PPS) and Built Facilities Strategy (BFS) which were adopted in 2017 and are now out of date. There has been assessments done in 2018 and 2019 but Sport England have not had any oversight of these assessments. We would encourage a PPS and BFS to be done in collaboration with the NGB's so that a full review of the existing facilities for sport and recreation can be done.
- The proposed changes is to remove the options for a sports hub delivered as part of the Paddock Wood masterplan and provide enhancements to existing facilities at Green Lane and Putlands Leisure Centre. The Green Lane facilities already has an existing fullsize grass playing pitch which is in good condition according to the 2017 PPS. The PPS also noted that a feasibility study would need to take place at Green Lane to ensure that additional playing fields could be accommodated on this site. It is unclear in the Paddock Wood Growth Follow on study produced by DLA that a feasibility study took place at both Green Lane and Putlands to ensure that these necessary upgrades to the facilities could take place.

Please set out what modification(s) you consider necessary to the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) Incorporating the Proposed Changes set out in the Development Strategy Topic Paper Addendum, legally compliant or sound, having regard to

the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness. You will need to say why this modification will make the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Sport England would like to see the council produce an updated PPS and BFS in collaboration with the National Governing Bodies for sport in order to better understand the sport and recreation provision in the council.

We have had conversations with Football and Cricket recently who have raised significant concerns over the access to facilities.

If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?

No, I do not wish to participate at the examination hearings

Submission 47-2

To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?

Appendix D: Proposed changes to policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

Which part of the plan does your comment relate?

Policy

What is the reference number?

STR/SS 1

Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it:

Yes No

Legally Compliant Selected Not Selected

Sound Selected Not Selected

Please set out what modification(s) you consider necessary to the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) Incorporating the Proposed Changes set out in the Development Strategy Topic Paper Addendum, legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness. You will need to say why this modification will make the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

This major development at Paddock Wood will have significant impact on the existing demand for sport and physical activity provision. Sport England would strongly suggest that an FPM run for swimming pools and halls in the borough is carried out. This will provide a comprehensive overview of the existing provision and the impact of major developments on this provision. Given that there will be an increase in population, Sport England would suggest that the below wording as part of STR1/SS is amended to require that a swimming pool is delivered in the local area through the development.

f. Sport and Leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which may include a 25m swimming pool)

If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?

No, I do not wish to participate at the examination hearings

Submission 47-3

To which part of the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) as set out in the Development Strategy Topic Paper Addendum does this representation relate?

Appendix C: Proposed changes to the Strategic Policies

Which part of the plan does your comment relate?

Policy

What is the reference number?

STR1

Do you consider the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) would make it:

Yes No

Legally Compliant Selected Not Selected

Sound Selected Not Selected

Please set out what modification(s) you consider necessary to the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) Incorporating the Proposed Changes set out in the Development Strategy Topic Paper Addendum, legally compliant or sound, having regard to the Matter you have identified at Section 5 (above) where this relates to legal compliance or soundness. You will need to say why this modification will make the Proposed Changes to the Borough Local Plan Submission Version (2020 – 2038) legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

With the proposed delivery of approximately 12,000 homes across Tunbridge Wells, Sport England would highly recommend the use of Active Design as a measure to ensure that new development provide healthy and active environments and are well connected to facilities and services. Sport England, with the support of the Office for Health Improvement and Disparities (OHID) and Active Travel England (ATE), has produced 'Active Design' <https://www.sportengland.org/facilities-planning/active-design/>, a guide to planning new developments that create the right environment to help people get more active. The guidance sets out ten key principles for ensuring new developments are designed to incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. It is therefore requested that Active Design is recommended to be used as a checklist for all new developments within the Tunbridge Wells Development Plan, especially as the inspectorate has identified a need for sustainable travel through these developments. This could be added as part of STR1.

If your representation is seeking a modification, do you consider it necessary to participate at the examination hearings stage when it resumes?

No, I do not wish to participate at the examination hearings