

**From:** [REDACTED]  
**To:** [Local Plan \(TWBC\)](#)  
**Subject:** Local Plan 2020 - 2038 Main Modifications Consultation - Sport England ref: SP/19/00001096  
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Good afternoon,

Thank you for inviting Sport England to comment on the Main Modifications of the Tunbridge Wells Local Plan.

We have reviewed the documents and only have one comment to make:

MM 81 Policy STR/SS Policy STR/SS 1 *The Strategy for Paddock Wood, including land at east Capel* Page 94 15 a)

We note that the following states:

- a. *sports and leisure provision to include an upgrade to existing indoor and outdoor sports facilities (which shall include a 25m swimming pool if feasible);*

Any new sporting provision should be based on robust evidence as per paragraph 103 of the National Planning Policy Guidance December 2024. Turnbridge Wells Built Facility Strategy, (BFS) is out of date and is not considered robust. We would strongly urge TWBC to carry out a new BFS with the backing of running our Planning Facility Model, (FPM) if this policy is not to be challenged by external developers.

We would also suggest, that TWBC also renews its outdated playing pitch strategy at the same time.

If you require any further assistance or clarification, please do not hesitate to contact me.

Kind regards

Bob

**Bob Sharples** RIBA ARB MRTPI Principal Planning Manager - South Team Planning & Active Environments

**M:** [REDACTED]

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