

Examination of the Tunbridge Wells  
Borough Local Plan

**Tunbridge Wells Borough Council**  
**Hearing Statement**

**Matter 4: The Strategy for Paddock  
Wood**

**Issue 3: Sports and Leisure Provision**

**Document Reference: TWLP/136**



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# Matter 4 – The Strategy for Paddock Wood

## Issue 3 – Sports and Leisure Provision

### Inspector’s Question 1: [re. sports requirement]

**What is the projected requirement for sports and leisure facilities as a result of the suggested changes to the Plan? Have needs been determined by relevant and up-to-date evidence?**

### **TWBC response to Question 1**

#### **Introduction**

1. The Councils Strategic Sites Masterplanning and Infrastructure report [[CD 3.66a](#)] (SSMIR) undertook a baseline review for the expansion of Paddock Wood and land at east Capel (PWeC) as part of the work to support the allocation of strategic growth under STR/SS1 and STR/SS 2. It sets out that land will be provided for sport and recreation in the form of ‘open space, youth and children’s play and sports facilities (including a swimming pool and new outdoor sports hub) and recreational facilities’, and ‘Areas of natural and semi-natural green space and allotments/food growing areas.’ (para 4.101). Furthermore ‘The requirements for Tudeley Village are similar but do not include a swimming pool or outdoor sports hub.’ (para 4.102).
2. The SSMIR states that there were comments received as part of the early community engagement that ‘the town has some leisure facilities but it was felt that there had been a lack of delivery in recent years. An upgrade to indoor and outdoor facilities is desired, including a swimming pool’ Also that ‘The area north of the railway to the east of the Transfesa Road employment area was identified by the town council as ideal for a major sports hub.’
3. Three development Options were considered as part of the SSMIR, with the preferred Option 1 that the Submission Local Plan took was for a ‘a new sports and leisure hub

which could include a swimming pool, indoor and outdoor sports, with the potential for a co-located health centre' as part of the south-western parcel of the allocation.

4. The Council's IDP set out a list of items (indoor and outdoor) that are needed for the expansion of Paddock Wood, in addition to provision of open space in accordance with minimum standards.
5. The Initial Findings [[ID 012](#)] sets out that 'Paddock Wood is a town with a good range of services, employment premises and public transport provision. It is also surrounded by some land which is outside the Green Belt and AONB – a unique position in Tunbridge Wells. It is therefore an agreed position in the Initial Findings that Paddock Wood represents a 'logical choice for growth', but that the strategy for the town needs revisiting, and that land allocated for housing in Flood Zone 1 is not justified (paragraph 52). Consequential impacts of the Council's decision on Tudeley Village (STR/SS 3) are also identified as having implications.

## Consideration

6. The Council's Development Strategy Topic Paper Addendum [[PS 054](#)] (DSTPA) sets out that the implications from the potential removal of the Tudeley Village allocation, in addition to the reduced level of developable land within Flood Zone 1 at PWeC and the need to deliver appropriate levels of secondary school education, means associated sport and leisure facilities also needed comprehensive review.
7. A reduction in growth in the plan is now proposed as set out in the DSTPA and results in an overall reduction in homes at STR/SS 1. This is set out in Table 4 (Section 13).
8. The change in residential capacity on the sites around Paddock Wood and revisions to flood risk boundaries mean that a re-examination of new and enhanced sports and leisure provision has been required. To ensure that the town is adequately provisioned for sports facilities, both indoor and outdoor, a review of existing sites and opportunities to intensify them has also been undertaken.
9. Previously the focus on provision of new sports and leisure facilities to support growth and enhance the town's provision through the Infrastructure Delivery Plan [[CD 3.142](#)] (IDP) was via a sports hub. However, owing to the changes in flood risk information, the need to provide a new secondary school, and a reduced overall capacity of the growth

sites, a different approach has been adopted to maximise improvements to provision for the town. The SSMIR Follow On Study (FOS) [[PS 046](#)] sets out the approach to reviewing the sports and leisure need at paragraph 3.15 onwards.

10. The Council's IDP sets out that the Council commissioned a Playing Pitch Strategy (PPS) and in 2018, two further studies were commissioned: The Open Space Study (OSS) and the Indoor Sports Facilities Study (ISFS). The studies have been produced in accordance with Sport England guidance and National Bodies for Sport, and have been subject of consultation with local clubs and parish/town councils. The IDP lists a full list of studies in relation to sports and recreation (see IDP extract at Appendix 1).
11. The evidence within the Submission Local Plan is extensive and included significant input as part of the strategy for delivering sport and leisure facilities in this plan making cycle. The allocation complies with the Sport England 12 Planning for Sport Principles and would see a significant uplift in sport and leisure provision as part of the PWeC development.
12. The proposed revised strategy for PWeC seeks to retain much of the quantum of sport and leisure provision as set out in the SLP that would have been previously delivered as part of a sports hub, however in the aggregate across existing facilities at Putlands and Green Lane in addition to other provision as part of the south-eastern parcel. The difference between the SLP position and that of the proposed changes set out in the DSTPA and SSMIR Follow on Study [[PS 046](#)] is a net reduction by only a one under-11/12 and one under-13/14 football pitches (SSMIR para 3.27).

## Conclusion

13. Proposed changes have resulted in a net reduction of approximately 1,000 homes at site STR/SS 1 Paddock Wood and land at east Capel across the across the plan period. A further 2,400 homes would be lost with the removal of Tudeley Village if it were to be removed, meaning the sport and leisure need would be dramatically reduced from the area.
14. Nevertheless the Council has sought to maintain a significant level of new Sport and Leisure provision, based on evidence submitted with the local plan, for the development at Paddock Wood

## Inspector's Question 2: [re. how will needs be met]

How will the needs for sports and leisure facilities in Paddock Wood be met?

### TWBC response to Question 2

#### Introduction

15. The Initial Findings sets out that 'Paddock Wood is a town with a good range of services, employment premises and public transport provision and given its setting it represents a 'logical choice' for growth'. The Initial Findings sets out that the strategy for the town needs revisiting. As set out above the consequential impacts of the Council's decision on Tudeley Village (STR/SS 3) and a reduction in housing at Paddock Wood and land at east Capel (STR/SS 1) means that a reduced need would be anticipated.

#### Consideration

16. In the Councils Strategic Sites Masterplanning and Infrastructure Report Follow on Study [[PS 046](#)] (FOS) sets how policy STR/SS 1 will identify sports and leisure facilities will be improved and delivered. The revised policy is set out as part of **Appendix 2** of this statement.
17. Criterion 7 of the 'Development Principles' identifies that the development will 'Meet the informal and formal recreational needs of the development and provide areas of green and open space [as shown schematically on Map 28], and biodiversity objectives of Policy EN9 and which where possible integrates with neighbouring Parcels to ensure a consistent and legible functional and visual relationship between them'
18. Furthermore criterion xiii of the 'Masterplanning' section requires collaborative working in order to deliver infrastructure. 'The masterplans for the Eastern and Western Parcels shall include a phasing and implementation plan which shall identify the phasing of development across the whole of the relevant Parcel to ensure that the development will be carried out in a manner that co-ordinates the implementation and occupation of the development and the timely delivery of such necessary on and off-site infrastructure as shall be reasonably required to support the development and occupation of each Parcel and its proper integration with neighbouring Parcels and the timely provision of Parcel specific and shared infrastructure taking into account Table 11 of the Council's SSMIR

dated February 2021 as may be updated from time to time) or as may otherwise be reasonably required.'

19. Revised policy STR/SS 1 includes a section on Strategic Infrastructure requirements where '*infrastructure will be secured by conditions and/or s.106 obligations to the individual developer applications*' and at criterion b) which sets out that '*There are supporting facilities (including access to green and blue infrastructure, leisure and sporting facilities, shops, health, community and educational facilities) that will allow the early establishment of a self-sufficient and cohesive community with an appropriate level of supporting infrastructure provision;*'
20. Each of the individual parcel policies that will deliver residential development STR/SS 1 (A) North Western Parcel, (B) South Western Parcel, (C) South Eastern Parcel, (D) Norther Eastern Parcel where Section 106 agreements will secure contributions to the delivery of infrastructure schemes as required.

## Conclusion

21. The Sport and Leisure needs will be met onsite in a combination of developer led and other means of delivery through S.106 contributions towards the infrastructure needs of the development. The infrastructure its delivery will be set out in a revised Infrastructure Delivery Plan as part of the Main Modifications process.

## Inspector's Question 3: [re. justification for deleting the sports hub]

**What is the justification for seeking to delete the proposed sports 'hub', rather than move it to an area not at risk of flooding or modify the Plan in another way to make it sound?**

### **TWBC response to Question 3**

#### **Introduction**

22. The Submission Local Plan indicated that to meet the necessary growth associated needs for sport and recreation provision a mixture of infrastructure would be required. This was set out in policy STR/SS 1 and comprised a new sports and leisure hub, which could incorporate an indoor 25m swimming pool and indoor and outdoor sports facilities. Around 10 hectares of land was also to be safeguarded within the western parcel, to the south of the railway line and to the east of the A228 for this purpose. Sport and recreation infrastructure was to be secured either in kind (land) and/or financial, as set out in the Strategic Sites Masterplanning and Infrastructure Study.
23. The Strategic Sites Masterplanning and Infrastructure Report (SSMIR) [[CD 3.66a](#)] states that there were comments received as part of the early community engagement that 'Sports and leisure provision: the town has some leisure facilities but it was felt that there had been a lack of delivery in recent years. An upgrade to indoor and outdoor facilities is desired, including a swimming pool' Also that 'The area north of the railway to the east of the Transfesa Road employment area was identified by the town council as ideal for a major sports hub.'
24. The Initial Findings [[ID 012](#)] identifies a number of matters which have required significant further work to resolve. The Development Strategy Topic paper Addendum [[PS 054](#)] (DSTPA) sets out the council's strategy in responding to the Initial Findings including how a revised strategy for STR/SS 1 can incorporate the Sport and Leisure facilities to meet the demand from the growth.

#### **Consideration**

25. As with the revisions necessary for Education provision (Matter 4 Issue 2), the implications from the potential removal of the Tudeley Village allocation, in addition to



the reduced level of developable land within Flood Zone 1 at Paddock Wood and land at east Capel (PWeC) and the need to deliver appropriate levels of secondary school education, means associated sport and leisure facilities have also needed comprehensive review. A reduction in amount of land available for development and as a consequence a reduction in the number of houses means that there is less available land for the delivery of a standalone sports hub.

26. The land available to help to meet the need most important for housing is reduced as a result of the Council's strategy to identify land for housing delivery to be solely in Flood Zone 1 (FZ1). This has meant utilising the FZ1 land for the maximisation of housing delivery as a key focus for the strategy at PWeC. Much of the land previously identified for the Sports Hub in the SLP is located in this Flood Zone 1 land in the south-western parcel of the allocation.
27. Following the assessment of existing facilities, it is considered that an appropriate level of sport and leisure facilities can be accommodated within existing facilities, with some new pitch provision still being delivered within the SW development parcel. This approach satisfies the vast majority of provision set out in the original Structure Plan. Further intensification of use could occur, for example by the replacement of the grass football pitch with an artificial surface, which can be used for more hours each week, supporting greater levels of participation and provision.
28. Whilst the proposed changes means that there would not be the delivery of a sports hub, the delivery of sport and leisure facilities across two existing sites does provide some benefits from this approach in that the delivery can be phased, will enable enhancement to existing underused sites, and will be closer to existing residents for access.
29. It is noted that the Paddock Wood Neighbourhood Development Plan identifies the importance of sport and recreation for the Town Council and that there is an aspiration that there will be improvements to existing facilities delivered through the anticipated additional housing associated with the Local plan. The NDP also identifies an outdoor hub to the north of the town that could be co-located with school provision, however the land identified is within Flood Zone 3 as shown in the Councils Updated present day and climate change Flood Zone modelling [[PS\\_044](#)] and would as a result be

compromised for use as a community facility. The council considers that the sport and leisure provision can still be delivered, through three different sites, on sites which are less vulnerable to flooding and therefore are sequentially more preferable.

30. As a result of the extensive work undertaken reviewed the delivery of sport and leisure facilities the council has sought to re-provide in a holistic approach across two existing sites and one new site within the western development parcels. All available land for the delivery of housing is within Flood Zone 1, with all other land available within the site allocation being at risk of flooding, meaning there is justification for the Council's approach.

## Conclusion

31. The Council's approach to the response to the Initial Findings has resulted in a proportionate review of the land available at PWeC, particularly for housing. Whilst the allocation for housing in the SLP has significantly reduced, the delivery of Sport and Leisure has been prioritised in the approach for the delivery of Infrastructure.
32. Whilst a new sports hub cannot now be delivered in a standalone site the respective elements can in the main still be delivered by the much reduced housing across three sites which are targeted for significant improvement.

## **Inspector’s Question 4: [re. how and when will facilities be provided]**

**How and when will the proposed improvements to facilities at Putlands and Green Lane be provided? Who will fund and deliver the projects and is this sufficiently clear to users of the Plan?**

### **TWBC response to Question 4**

#### **Introduction**

33. The Council has published the Strategic Sites and Masterplanning Infrastructure Report - Follow On Study (FOS) [[PS\\_046](#)] which sets out the comprehensive approach to reviewing the masterplanning for the growth at Paddock Wood and East Capel. This document assesses all of the implications from reduced land availability in Flood Zone 1 and the necessary consequential changes to the delivery of infrastructure including education and, sport and leisure.

#### **Consideration**

34. The FOS sets out when the necessary sport and leisure infrastructure is expected to be delivered, and this information will be updated in the Infrastructure Delivery Plan as part of the Main Modifications. The contributions have been assessed as part of the masterplanning exercise and reviewed in the viability review exercise that has been undertaken and is set out in the Council’s respective reports [[PS\\_061](#) and [appendices](#)].
35. Delivery of enhancements to existing facilities will be an ongoing discussion between TWBC and Paddock Wood Town Council for sites within the ownership of the Town Council where there are significant costs associated with delivering up to date facilities in accordance with revised policy STR/SS 1 and the Neighbourhood Development Plan.
36. The Council has experience in delivering facilities, in particular recently at the Paddock Wood Community Centre and as such can do this with or without developer involvement and will engage on the delivery of the sites so that the facilities come forward as required and that financial contributions are collected.
37. Facilities within the western parcel will be developer led delivery, and will require cross engagement of both developers and the engagement with Capel Parish Council.

38. The FOS identifies a revised infrastructure schedule for the purposes of the Councils response to the Initial Findings. The revised Infrastructure Schedule (Table 8 of the FOS) is based on Scenario 2, presented in the February 2021 Strategic Sites Masterplanning and Infrastructure Study. Scenario 2 set out the required infrastructure should only the Paddock Wood sites come forward. With the potential removal of Tudeley Village from the Local Plan strategy, this forms the basis for the updated framework and infrastructure schedule as a whole. The sport and leisure facilities are anticipated to be required in the short to medium term depending on the facility and the viability review sets out when these will required.
- Sports pitches contribution (per Open Space SPD). Short term dependent on the facility and improvement likely to be delivered.
  - Indoor Sports centre inc. dry side fitness facilities, extension to Putlands SC - 4 lane pool, 4-court hall, health/fitness gym, studio. Medium term
  - Upgrades to Putlands - all-weather pitch, 4x tennis/netball. Medium term
  - Upgrades to Green Lane - pavilion, rugby, football. Medium term
  - Athletics track upgrade to make the existing entire track 6 lane. Medium term
39. The Council will update its Infrastructure Delivery Plan [[CD 3.142](#)] as part of the main modifications to indicate broad assumed costs and delivery time frames, and importantly who will be delivering the infrastructure.
40. Furthermore as part of the Councils ongoing commitment to ensure the delivery of growth at Paddock Wood and land at east Capel comes forward with the housing and infrastructure aligned, it is intended to require the developers to be part of a Council run Delivery Board who will meet regularly to track progress of the development.

## Conclusion

41. The Councils revised policy STR/SS 1 sets out the requirements for the delivery of a phasing and implementation plan as part of the application proposals. This phasing and implementation plan will identify when infrastructure comes forward, and where. The infrastructure itself will be secured through requisite S.106 agreements and/or condition depending on the nature of the facilities.

42. The Council proposes to update its Infrastructure Delivery Plan as part of the Main Modifications process to set out the timeline of when the infrastructure will come forward.

## **Inspector’s Question 5: [re. Has feasibility been undertaken]**

**Have any feasibility studies been carried out to determine whether or not the sites at Putlands and Green Lane can be upgraded in the manner proposed? Are the sites developable?**

### **TWBC response to Question 5**

#### **Introduction**

43. In support of the Submission Local Plan the Council undertook a significant level of evidence gathering to support the growth aspirations for strategic development at Paddock Wood and Tudeley Village (policies STR/SS 1 and STR/SS 3 respectively).
44. The Council’s approach in responding to the Initial Findings [[ID\\_012](#)] is set out in the Development Strategy topic Paper Addendum [[PS\\_054](#)] which identifies that a significant reduction in housing is proposed through the removal of the Tudeley Village allocation from the plan, and as a result of further flood modelling a reduction in housing at Paddock Wood by approximately 1,000 dwellings.
45. The Sport and Leisure infrastructure that will now be delivered has been set out earlier in this statement and will be undertaken across existing and new sites.

#### **Consideration**

46. The Council’s Infrastructure Delivery Plan [[CD\\_3.142](#)] lists a series of studies undertaken in relation to sport and recreation. Appendix 1 shows this list in full.
47. Further to the response to the Initial Findings the Council has revised its Strategic Sites Masterplanning and Infrastructure Report Masterplanning Follow On Study [[PS\\_046](#)] (FOS), which sets out that in light of the revised overall approach to growth, changes in flood risk information, the need to provide a new secondary school, and a reduced overall capacity of the growth sites, a different approach has been adopted to maximise improvements to provision for sport and leisure for the town. This approach is providing improvements to existing facilities as well as new provision of outdoor sports facilities within the growth sites.

48. As part of the FOS a review of existing open spaces and sports facilities within Paddock Wood was undertaken to determine which sites had potential for intensification and improvements. Table 1 of the FOS sets out the results from the review.
49. It is acknowledged that the review was only high level and that further feasibility will be required, however the earlier evidence base which supports the SLP does identify the need for improved facilities both indoor provision and outdoor pitch provision. The SLP identified through the IDP a significant number of improvements in addition to the provision of a sports hub, which included improvement of existing facilities at Fuggles Close, Cogate Road, improvements to facilities in other parks and gardens, pitch improvements to Paddock Wood Rugby Club, the addition of further football pitches (adult / 1 junior), the re-provision of cricket at the Memorial ground, in addition to the proposed Sports hub. Furthermore, as part of the currently consented schemes at Paddock Wood, S106 funds have been able to be utilised to improve existing facilities at Memorial Park. Further contributions from already these already consented schemes could be utilised to further improve other sites such as at Elm Tree sports pitches which is a key requirement for the Town Council.
50. The proposed enhancements at Putlands are likely to be in the form of a standalone new building incorporating a swimming pool and additional indoor facilities, whilst at Green Lane existing facilities would be improved. Figure 11 of the FOS has indicated how the additional facilities might be delivered at these sites, and the rationale for further outdoor pitch provision as part of the development on the south-western parcel of development through a developer led scheme.
51. The FOS masterplanning work has assessed the capacity at the various sites to deliver additional pitch provision and upgrades to existing facilities with existing sites having the benefit of already having access to utilities and the highway meaning delivery would be more accessible at the time it is required.

## Conclusion

52. The Council has undertaken some high level feasibility for the deliverability of sites at Putlands and Green Lane which assesses that land is available for the upgrades proposed in the Masterplanning Follow on Study to indicate that the sites are developable.

53. Further more detailed feasibility will be necessary as part of ongoing deliverability discussions post adoption of the Local Plan.



# Appendices

# Appendix 1: Infrastructure Delivery Plan extract

## Theme 7: Sport and Recreation

Paragraph 3.212 – List of studies in relation to sports and recreation:-

- Tunbridge Wells Borough Indoor/Built Sports facility needs assessment – June 2018
- Tunbridge Wells Borough Council Open Space, Sport and Recreation Study June 2018
- Tunbridge Wells Borough Council Playing Pitch Strategy – November 2017
- Tunbridge Wells Borough Council Open Space, Sports and Recreation Study (2017) Community and Stakeholder Consultation Report (Final)
- Tunbridge Wells Borough Retail and Leisure Study on behalf of Tunbridge Wells Borough Council - April 2017
- Tunbridge Wells Playing Pitch Strategy Review 2019/20
- Tunbridge Wells Local Football Facility Plan - March 2020 Tunbridge Wells
- Tunbridge Wells Borough Council Site Options Analysis – Tunbridge Wells Borough Council Sports Hub – July 2020
- Retail, Commercial leisure and Town Centre Uses Study on behalf of Tunbridge Wells Borough Council - 2021

# Appendix 2: Revised Policy STR/SS1 The Strategy for Paddock Wood, including land at east Capel

Please see separate document TWLP\_136\_Appendix 2 - Revised Policy STR SS1