Public Document Pack

TONBRIDGE & MALLING BOROUGH COUNCIL

EXECUTIVE SERVICES

Chief Executive
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NB - This agenda contains proposals, recommendations and options. These do not represent Council policy or decisions until they have received proper consideration through the full decision making process.

Contact: Democratic Services
committee.services@tmbc.gov.uk

7 July 2025

To: MEMBERS OF THE HOUSING AND PLANNING SCRUTINY SELECT COMMITTEE
(Copies to all Members of the Council)

Dear Sir/Madam

Your attendance is requested at a meeting of the Housing and Planning Scrutiny Select Committee to be held in the Council Chamber, Gibson Drive, Kings Hill on Tuesday, 15th July, 2025 commencing at 7.30 pm.

Members of the Committee are required to attend in person. Other Members may attend in person or participate online via MS Teams.

Information on how to observe the meeting will be published on the Council's website.

Yours faithfully

DAMIAN ROBERTS

Chief Executive

A G E N D A

1. Guidance for the Conduct of Meetings 7 - 10

PART 1 - PUBLIC

2. Apologies for absence

3. Notification of Substitute Members 11 - 12

4. Declarations of interest 13 - 14

Members are reminded of their obligation under the Council's Code of Conduct to disclose any Disclosable Pecuniary Interests and Other Significant Interests in any matter(s) to be considered or being considered at the meeting. These are explained in the Code of Conduct on the Council's website at Code of conduct for members – Tonbridge and Malling Borough Council (tmbc.gov.uk).

Members in any doubt about such declarations are advised to contact Legal or Democratic Services in advance of the meeting.

5. Minutes 15 - 20

To confirm as a correct record the Notes of the meeting of the Housing and Planning Scrutiny Select Committee held on 20 May 2025

6. Kent Downs National Landscape - Outside Body Update Verbal Report

Representatives from the Kent Downs National Landscape to provide a presentation with an update about the organisation.

Matters for Recommendation to the Cabinet

7. Proposal for Monthly Member Briefing Sessions on Pre-application Development Proposals 21 - 32

This report sets out a proposal to establish regular, officer-chaired briefing sessions for Members, to provide early visibility of major development proposals progressing through the pre-application process. The aim is to enhance Member engagement, while maintaining the confidentiality and integrity of the planning process.

8. Heritage Information and Advice to Support the Local Plan including Information in relation to Conservation Areas 33 - 106

This report sets out the approach the Council should take in relation to obtaining heritage information and evidence to support the emerging Local Plan, including progressing work on Conservation Area statements and Appraisals. In doing so, the report also considers advice from the Heritage Strategy that was produced in 2024 to support the emerging Local Plan.

9. Development of a Homelessness and Rough Sleeping Strategy 107 - 112

This report sets out the proposal to develop a new standalone Homelessness and Rough Sleeping Strategy for the Council and seeks endorsement of the approach that will be taken to achieve this.

10. Sports Facilities Evidence 113 - 448

This report outlines the Council's emerging approach to maintaining and enhancing sports facilities in the borough through the adoption of the Indoor Sports Facilities Strategy [Annex 1] and the Playing Pitches and Outdoor Sports Facilities Strategy [Annex 2].

11. Planning Technical Consultation Responses 449 - 482

This report provides Members with an update on technical consultations that have been published by the Ministry of Housing, Communities and Local Government (MHCLG). These relate to improving transparency and monitoring of building out of schemes and to proposed reforms to Planning committees including their size and which types of application can be considered by those committees.

Matters submitted for Information

12. Procedure on Amendments to Planning including Reserved Matters Applications - Update 483 - 486

The procedure for making amendments was formally implemented following Cabinet approval on 7 January 2025. As part of this process, it was agreed that an update report would be brought to the Housing and Planning Scrutiny Select Committee after six months to provide an overview of progress and any emerging issues.

13. Offences under the Tree Preservation Legislation 487 - 522

This report provides an overview of offences under tree preservation legislation, including the classification of such offences, distinguishing between summary offences and those triable either way and the potential penalties arising from non-compliance. Additionally, the report includes information on the Felling Licence regime administered by the Forestry Commission, as well as the role of Kent Police's Wildlife Crime Unit in enforcing relevant legislation.

14. Work Programme 2025/26 523 - 526

The Work Programme setting out matters to be scrutinised during 2025/26 is attached for information. Members can suggest future items by liaising with the Chair of the Committee.

15. Urgent Items 527 - 528

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive

Matters for consideration in Private

16. Exclusion of Press and Public 529 - 530

The Chairman to move that the press and public be excluded from the remainder of the meeting during consideration of any items the publication of which would disclose exempt information.

PART 2 - PRIVATE

17. Urgent Items 531 - 532

Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

MEMBERSHIP

Cllr D W King (Chair)
Cllr Mrs S Bell (Vice-Chair)

Cllr G C Bridge
Cllr R W Dalton
Cllr D A S Davis
Cllr P M Hickmott
Cllr M A J Hood
Cllr R W G Oliver
Cllr W E Palmer
Cllr R V Roud
Cllr K B Tanner
Cllr D Thornewell
Cllr C J Williams

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GUIDANCE ON HOW MEETINGS WILL BE CONDUCTED

(1) Most of the Borough Council meetings are livestreamed, unless there is exempt or confidential business being discussed, giving residents the opportunity to see decision making in action. These can be watched via our YouTube channel. When it is not possible to livestream meetings they are recorded and uploaded as soon as possible:

https://www.youtube.com/channel/UCPp-IJlSNgoF-ugSzxjAPfw/featured

(2) There are no fire drills planned during the time a meeting is being held. For the benefit of those in the meeting room, the fire alarm is a long continuous bell and the exits are via the doors used to enter the room. An officer on site will lead any evacuation.

(3) Should you need this agenda or any of the reports in a different format, or have any other queries concerning the meeting, please contact Democratic Services on committee.services@tmbc.gov.uk in the first instance.

Attendance:

- Members of the Committee are required to attend in person and be present in the meeting room. Only these Members are able to move/ second or amend motions, and vote.
- Other Members of the Council can join via MS Teams and can take part in any discussion and ask questions, when invited to do so by the Chair, but cannot move/ second or amend motions or vote on any matters. Members participating remotely are reminded that this does not count towards their formal committee attendance.
- Occasionally, Members of the Committee are unable to attend in person and may join via MS Teams in the same way as other Members. However, they are unable to move/ second or amend motions or vote on any matters if they are not present in the meeting room. As with other Members joining via MS Teams, this does not count towards their formal committee attendance.
- Officers can participate in person or online.

- Members of the public addressing an Area Planning Committee should attend in person. However, arrangements to participate online can be considered in certain circumstances. Please contact committee.services@tmbc.gov.uk for further information.

Before formal proceedings start there will be a sound check of Members/Officers in the room. This is done as a roll call and confirms attendance of voting Members.

Ground Rules:

The meeting will operate under the following ground rules:

- Members in the Chamber should indicate to speak in the usual way and use the fixed microphones in front of them. These need to be switched on when speaking or comments will not be heard by those participating online. Please switch off microphones when not speaking.
- If there any technical issues the meeting will be adjourned to try and rectify them. If this is not possible there are a number of options that can be taken to enable the meeting to continue. These will be explained if it becomes necessary.

For those Members participating online:

- please request to speak using the 'chat or hand raised function';
- please turn off cameras and microphones when not speaking;
- please do not use the 'chat function' for other matters as comments can be seen by all;
- Members may wish to blur the background on their camera using the facility on Microsoft teams.
- Please avoid distractions and general chat if not addressing the meeting
- Please remember to turn off or silence mobile phones

Voting:

Voting may be undertaken by way of a roll call and each Member should verbally respond For, Against, Abstain. The vote will be noted and announced by the Democratic Services Officer.

Alternatively, votes may be taken by general affirmation if it seems that there is agreement amongst Members. The Chairman will announce the outcome of the vote for those participating and viewing online.

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Housing and Planning Scrutiny Select Committee – Substitute Members (if required)					
	Conservative	**Liberal Democratic**	**Green**	**Ind. Kent Alliance**	**Labour**
1	Robert Cannon	Bill Banks	Lee Athwal		Angus Bennison
2	Luke Chapman	Tim Bishop	Kath Barton		
3	Sarah Hudson	Frani Hoskins	Anna Cope		
4	Mark Rhodes	Anita Oakley	Steve Crisp		
5	Keith Tunstall	Michelle Tatton	Bethan Parry		
Members of Cabinet cannot be appointed as a substitute to this Committee					

May 2025

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Declarations of interest

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TONBRIDGE AND MALLING BOROUGH COUNCIL

HOUSING AND PLANNING SCRUTINY SELECT COMMITTEE

MINUTES

Tuesday, 20th May, 2025

Present: Cllr D W King (Chair), Cllr Mrs S Bell (Vice-Chair), Cllr G C Bridge, Cllr R W Dalton, Cllr D A S Davis, Cllr P M Hickmott, Cllr M A J Hood, Cllr R W G Oliver, Cllr W E Palmer, Cllr R V Roud, Cllr K B Tanner and Cllr Mrs M Tatton (substitute).

Cllrs A G Bennison, R P Betts, S Crisp*, D Keers*, Mrs A S Oakley*, M R Rhodes* and M Taylor* were also present pursuant to Council Procedure Rule No 15.21.

(*participated via MS Teams)

Apologies for absence were received from Councillors D Thornewell and C J Williams.

HP 25/17 NOTIFICATION OF SUBSTITUTE MEMBERS

Notification of substitute Members were recorded as set out below:

- Cllr M Tatton substitute for Cllr D Thornewell

In accordance with Council Procedure Rules 17.5 to 17.9 these Councillors had the same rights as the ordinary member of the committee for whom they were substituting.

HP 25/18 DECLARATIONS OF INTEREST

There were no declarations of interest made in accordance with the Code of Conduct.

HP 25/19 MINUTES

RESOLVED: That the notes of the meeting of the Housing and Planning Scrutiny Select Committee held on 18 March 2025 be approved as a correct record and signed by the Chair.

HP 25/20 PLANNING ADVISORY SERVICE (PAS) REVIEW

The presentation of the Head of Planning advised Members that the Annual Service Delivery Plan 2025/26 required an Independent Planning Advisory Service Review to be completed by September 2025, an Action Plan for improvement to be developed by October 2025 and fully delivered by March 2026.

The review, scheduled to start in early July and completed by the end of September to coincide with changes in planning fees, the Planning and Infrastructure Bill and updates to National Planning Policy Framework, aimed to assess the planning function against five key themes of vision and leadership, performance management, community engagement, stakeholder engagement and achieving outcomes.

Particular reference was made to the importance of engaging with a wide range of stakeholders, including developers, agents, resident groups, statutory consultees, parish/town councils and councillors. The plan for member engagement was outlined and included interviews with Group Leaders and Area Planning Committee Chairs with a focus on proportional representation across political parties.

Members welcomed the review as an opportunity to identify best practice and areas of improvement. However, concern was also expressed about the process including the potential for justifying a single planning committee, the need for individual member input and the need for a transparent and inclusive review process. At the suggestion of the Committee, consideration would be given to setting up an email address for the Peer Review team so that Members could provide comments if they were not on the interview list.

MATTERS FOR RECOMMENDATION TO THE CABINET

HP 25/21 HOUSING STRATEGY UPDATE AND DRAFT YEARS 4 AND 5 ACTION PLAN

(Decision Notice D250042MEM)

The report of the Director of Planning, Housing and Environmental Health presented a draft Action Plan for years 4 and 5 (2025-2027) of the Housing Strategy (attached at Annex A).

Members were reminded that the Housing Strategy 2022-2027 set out the Borough Council's priorities and strategic approach to housing in the borough. Objectives for each priority in the Strategy were delivered and monitored through annual action plans.

Attention was drawn to the key priorities for years 4 and 5 including the development of a Homelessness and Rough sleeper Action Plan, development and implementation of a pro-active approach to tackling Empty Homes and revising and improving the Private Landlord offer. Members welcomed proposals in respect of establishing a local housing company to look at council owned provision and the progress being made on empty homes.

It was proposed by Cllr King, seconded by Cllr Davis and

***RECOMMENDED**: That the draft Action Plan for years 4 and 5 be adopted.

***Decision taken by Cabinet Member**

HP 25/22 LOCAL LETTINGS PLAN (LLP) POLICY

A new Policy setting out an approach to Local Lettings Plans (LLPs) for affordable housing in partnership with Registered Providers was outlined and attached at Annex A. A Local Lettings Plan template was also attached at Annex B.

The implementation of the proposed Policy would deliver a consistent approach to the use of LLPs on new affordable housing delivery. The process for shortlisting was detailed in 5.2 of the report and priority would be given to households with a local connection and aimed for 50% of lettings to economically active households.

Due regard was given to the financial and value for money considerations, the assessed risk and legal implications outlined in the report. Members sought clarification on the 'economically active' criteria with particular reference made to single parent households. It was explained that economically active was defined by permanent paid employment or work-based training and there was no special exemption for single parent households.

It was proposed by Cllr King, seconded by Cllr Palmer and

***RECOMMENDED**: That

(1) the Local Lettings Plan Policy and template (attached at Annexes A and B respectively), including amended ward groupings into sub-housing market areas (as set out 5.3 of the report) be approved; and

(2) delegated authority be given to the Director of Planning, Housing and Environmental Health, in liaison with the Cabinet Member for Housing, Environment and Economy, to make any minor amendments to the Local Lettings Plan Policy and/or template as experience in using them developed further.

***Recommended to Cabinet**

MATTERS SUBMITTED FOR INFORMATION

HP 25/23 SECTION 106 PROCESS

The report explained the process of how Section 106 agreements were initiated, negotiated, implemented and monitored within Tonbridge and

Malling. It also looked at affordable housing definitions to provide clarity on what was sought within s106 agreements.

The Section 106 Protocol was attached at Annex 1 and set out best practice guidance on managing a s106 obligation.

Particular reference was made to the recent Hadlow Manor appeal which progressed to non-determination due to delays in drafting the section 106 agreement and resulted in the inspector allowing the appeal.

Members sought clarification on how s106 contributions were allocated and whether ward members/parish councils were consulted. The need for transparency and adherence to legal tests was emphasised. Measures to provide better evidence of requirements and ensure better distribution of funds were being introduced. The importance of Parish Instructure Statements was highlighted and parish/town councils would be reminded to submit one via the Parish Partnership Panel. In addition, there were regular meetings with outside bodies, such as the Integrated Care Board, to discuss potential projects. Unfortunately, if s106 money was not utilised it was refunded to the developer.

There was in-depth discussion on social and affordable rents and concern was expressed that affordable rent did not meet the social need. The challenges for Registered Providers around social rent were discussed and noted.

HP 25/24 WORK PROGRAMME 2025/26

The Work Programme setting out matters to be scrutinised during the next year was attached for information. Members were invited to suggest future matters for the 2025/26 Programme and the following was identified:

(1) Service Management Plans and Resident Management Companies

Proposed by Cllr Davis, seconded by Cllr Oliver and supported by the Committee as service management fees could become a burden on homeowners. Consideration to be given as to whether this matter could be scrutinised effectively by the Housing and Planning Scrutiny Select Committee given the lack of expertise on this area within the Borough Council.

Other matters could be raised by liaising with the Chair of the Committee and the Scrutiny Officer.

MATTERS FOR CONSIDERATION IN PRIVATE

HP 25/25 EXCLUSION OF PRESS AND PUBLIC

The Chair moved, it was seconded and

RESOLVED: That as public discussion would disclose exempt information, the following matters be considered in private.

PART 2 - PRIVATE

MATTERS FOR RECOMMENDATION TO THE CABINET

HP 25/26 TEMPORARY ACCOMMODATION PROJECT

(Reasons: Part 2 Private – LGA 1972 Sch 12A Paragraph 3 – Financial or business affairs of any particular person).

The report set out proposals for a temporary accommodation project to help meet the Borough Council's requirements to mitigate and manage homelessness.

Due regard was given to the proposal presented, the financial and value for money considerations, including the use of external funding and the assessed risk and legal implications detailed in the report.

Members supported the proposal in principle as the importance of improving housing options for local people, whilst protecting outdoor areas, was recognised. Delivering a temporary accommodation scheme on previously utilised land allowed the Borough Council to mitigate costs, have management control and did not require the development of a greenfield site. Whilst there was some concern that the preferred site might not be the most suitable location due to lack of public transport and amenities, the feasibility study indicated that these were available.

It was noted that any Capital Plan Evaluation for the proposals would be presented to Council for consideration.

Cllr King proposed, seconded by Cllr Tanner and

*__RECOMMENDED__: That

(1) the feasibility study attached at Annex 2 to the report be endorsed;

(2) the procurement approach and timetable detailed in the report be approved by the Cabinet; and

(3) the proposals for a temporary accommodation scheme within the Borough, as detailed in the report, be approved by the Cabinet.

***Recommended to Cabinet**

The meeting ended at 10.21 pm

Housing and Planning Scrutiny Select Committee

15 July 2025

Part 1 - Public

Recommendation to Council

Cabinet Member	Cllr Mike Taylor, Cabinet Member for Planning
Responsible Officer	Eleanor Hoyle, Director of Planning, Housing & Environmental Health
Report Author	Hannah Parker, Development Manager

Proposal for Monthly Member Briefing Sessions on Pre-application Development Proposals

1 Summary and Purpose of Report

1.1 This paper sets out a proposal to establish regular, officer-chaired briefing sessions for Members, to provide early visibility of major development proposals progressing through the pre-application process. The aim is to enhance Member engagement, while maintaining the confidentiality and integrity of the planning process. The cost of presentation to Members for each scheme accepted will be £1000 for initial presentation and £500 for each follow-up presentation.

2 Corporate Strategy Priority Area

2.1 Efficient services for all our residents, maintaining an effective council.

3 Recommendations

3.1 Members are asked to endorse the proposed approach to Council, indicating their support for the establishment of monthly briefing sessions and the introduction of the proposed fees, which will supplement the existing pre-application services.

4 Introduction and Background

4.1 This proposal has been developed following discussions with the Cabinet Member for Planning, who has highlighted the need for improved Member engagement and oversight at the pre-application stage of the planning process. At present, opportunities for Members to view and influence emerging development proposals are more limited, and ward focused, often occurring only once an application has been formally submitted, at which point the scope for meaningful change is significantly reduced.

4.2 In response, this paper proposes the introduction of regular Member briefing sessions for schemes that are undergoing pre-application discussions . The intention is to provide Planning Committee Members with earlier visibility of major proposals and create a structured forum in which informal feedback can be offered before a planning application is finalised.

4.3 This new category is intended solely for major and strategic development proposals. To be eligible for participation, a scheme must fall within one of the qualifying categories outlined below and must either be currently undergoing, or has recently completed, one of the Council's formal pre-application services.

4.4 **Major application qualifying criteria and fee**

- ten to 99 new residential units
- creation or change of use is between 1,000 square metres 9,999 square metres
- proposals for residential units where floorspace exceeds 9,999 square metres will fall within the large or strategic development type
- £2,973

The fee covers:

- preliminary site visit by case officer
- internal meeting by case officer with internal services
- initial briefing by case officer to key members (where the case officer considers it necessary and proportionate to do so in liaison with those members)
- virtual meeting between developer and council teams (60 mins)
- written response (format to be agreed by the parties)

4.5 **Strategic development qualifying criteria and fee**

- creation of 100 or more new residential units
- creation or change of use of 10,000 square metres or more floorspace
- £3,850

The fee covers:

- preliminary site visit by case officer
- internal meeting by case officer with internal services
- Initial briefing by case officer to key members (where the case officer considers it necessary and proportionate to do so in liaison with those members)
- virtual meeting between developer and council teams (120 mins)
- written response (format to be agreed by the parties)

4.6 As outlined above, the Council already provides for Member engagement as part of its existing pre-application processes. The intention of this proposal is not to replace the current approach but to supplement and enhance it. Annex 1 provides

further detail and illustration of the proposed new offer. Specifically, the proposal seeks to formalise a structured approach to Member engagement by introducing a new category of regular early engagement sessions with Planning Committee Members.

4.7 This new category will create a forum for Members of the Planning Committee who can be briefed on, and offer informal feedback regarding, emerging development proposals. A key prerequisite for participation in these sessions is that the scheme must be the subject of a current or recently completed pre-application process with the Council, ensuring that proposals are at a stage where Member input can meaningfully influence design evolution.

4.8 Written feedback will not be provided from these sessions meaning that officer led pre applications will not be held up if developers are also utilising this service concurrently.

4.9 Furthermore, developers will have the option to request a follow-up session, subject to the applicable fee. This is advised to be at a discounted rate (1/2 price). This would provide an opportunity to present a revised scheme and demonstrate how earlier Member feedback has been taken into account in the design development process.

4.10 Depending on the success of the engagement a subsequent Member Engagement session could happen at the planning application stage. However, this would be subject to a further report to HPSSC.

4.11 The proposed approach ensures that the Area Planning Committee can engage with significant schemes from the outset. This early-stage involvement allows Members to raise key planning issues, highlight local sensitivities, and may influence the direction of development while changes can still be readily accommodated. It is anticipated that this will lead to improved outcomes for both applicants and the wider community.

4.12 The proposed fee has also been benchmarked against practices adopted by other local authorities across Kent and London but is also based on average cost recovery for offering the service. It is noted that a number of Kent authorities do not currently offer formal Member engagement sessions in this proposed form as part of their pre-application service. Where Member involvement does occur, it is typically facilitated through Planning Performance Agreements (PPAs), and the associated costs are often incorporated within those broader agreements rather than listed as separate standalone charges.

4.13 Based on this benchmarking exercise and the discretionary charging powers available to local authorities under the Local Government Act 2003, it is considered that a charge of £1,000 per session is reasonable, proportionate, and compliant with relevant legislation. A fee of £500 would be charged for

subsequent presentations to Committee, allowing developers the opportunity to demonstrate how their scheme has progressed.

4.14 Members should also be aware that these sessions carry staffing implications. Participation in these sessions will require planning officers to step away from their core responsibilities, particularly the processing of planning applications.

4.15 While the sessions offer clear benefits in terms of early engagement and improved outcomes, it is important to balance this with the potential impact on day-to-day service delivery.

5 Proposal - Proposed Structure and Operation

5.1 **Frequency and Timing**- It is proposed that a 1.5-hour session be held monthly. The scheduling of this regular slot will be agreed with Committee Services. Although not every session may be required, having a regular fixture will provide flexibility and support early programming.

5.2 **Number of Schemes-** Each session will allow for the presentation of up to two schemes. Each scheme will be allocated a 45-minute slot, comprising a developer presentation followed by Member questions and informal discussion.

5.3 **Format and Delivery**- Sessions will be delivered via Microsoft Teams to maximise accessibility and support wider Member committee attendance. Given that developers will be charged a fee to participate in these sessions, it is essential that sessions are well-attended to ensure value and impact. Sessions will be advertised to the Area committee which the development falls within. However, there is scope for all Members to be invited so they have strategic oversight of the developments within the borough. Members are asked to consider whether the invitation should be sent to all members or just those members who sit on the relevant Area Planning Committee.

5.4 **Chairing and Officer Role**- The sessions will be chaired by a lead officer who will introduce each scheme with a brief overview and clarify the purpose of the session, namely that it is a non-decision-making, confidential forum for early engagement. Members will be reminded that this is not a committee debate, and that information shared during the session should not be disclosed to members of the public at this stage. Members will also be reminded that they should keep an open mind throughout the session and that this is not where the decision will be made.

5.5 **Developer Role** -The developer will lead the substantive part of the session, providing an electronic presentation of no more than 20 minutes. This will be followed by up to 25 minutes for Members to ask questions and provide informal comments. This feedback may help shape the evolution of the scheme prior to any formal submission.

5.6 **Policy and Procedural Context-** These sessions are intended to supplement, rather than replace, existing consultation requirements as set out in the Council's Statement of Community Involvement and Pre-application offer. Developers will be expected to carry out public engagement in accordance with those requirements.

5.7 **Pre-Application Requirement-** Only schemes that have formally entered the pre-application process will be considered for presentation at these sessions. This ensures that any proposals brought forward are sufficiently advanced to benefit from meaningful Member engagement. Multi Member engagement submissions will be encouraged to show evolution of designs.

5.8 **Member Attendance**- Officers will work closely with the Leader, Cabinet Member for Planning and Democratic Services to promote attendance and ensure that Members are aware of the importance of these sessions. As this is a charged service it is important that all Members across the Council attend the relevant briefings. Their contribution is essential to the success and value of the process which is shape proposals are the early stages before submission of an application.

6 Other Options

6.1 Not endorse the decision and to keep Member engagement the same as currently stands.

7 Financial and Value for Money Considerations

7.1 This is a new charge which will sit along the pre-application charging schedule which is already reviewed yearly to ensure the Council continues to effectively recover costs.

8 Risk Assessment

8.1 This new charge will be monitored with the annual Review of Fees and Charges for Discretionary Planning Services. This already ensures that robust monitoring is carried out on a yearly basis to ensure that our protocols are up to date and reflect best practice and that the charging schedule reflects the costs of delivering the service and is based on up-to-date evidence.

8.2 A key risk to highlight is Member attendance. The effectiveness of these sessions relies heavily on the majority of the committee being present. Low attendance could undermine the value of the service, potentially leading developers to request refunds or reconsider using the service in the future.

9 Legal Implications

9.1 The Local Government Act 2003 provides the power for local authorities to charge for discretionary services (as defined in the Local Government Act 1999).

Discretionary services are those services that an authority has the power but not a duty to provide. An authority may charge where the person who receives the service has agreed to its provision. The power to charge under this provision does not apply where the power to provide the service in question already benefits from a charging power or is subject to an express prohibition from charging.

9.2 The Local Government Act 2003 places a duty on authorities to ensure that, taken one year with another, the income from charges for each kind of discretionary service does not exceed the costs of provision. An authority may set charges as it thinks fit, and may charge only certain people for a service or charge different people different amounts.

9.3 Local authorities are required to have regard for any guidance that may be issued by the Secretary of State in terms of carrying out their functions under the 2003 Act. Section 93(7) of the Act provides that certain prohibitions in other legislation preventing authorities from raising money are specifically dis-applied in relation to the exercise of the charging power.

9.4 Local Planning Authorities therefore have powers to recover the costs of preapplication advice in recognition of the time officers have to spend researching information in order to provide answers to prospective developers or applicants.

10 Consultation and Communications

10.1 The new fee will be published on-line on the Council's website. The uptake will be developer driven so no lead in time would be required.

11 Implementation

11.1 If adopted officers will work with Democratic services to find suitable dates which will be diarised in advance to Members Calendar. Relevant Members will be invited to attend meeting once meeting addenda have been set.

12 Cross Cutting Issues

12.1 Climate Change and Biodiversity

12.1.1 Limited or low impact on emissions and environment.

12.1.2 Climate change advice has not been sought in the preparation of the options and recommendations in this report.

12.2 Equalities and Diversity

12.2.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

- None

Background papers:	N/A
Annex	Annex 1 – Pre-application advice fees

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Annex 1

Pre-application advice fees

These fees are set from April 2025. See definition of each **development type**.

Prices inclusive of VAT.

Householder development fees

- written advice only: £312

Minor development fees

- written advice only: £473

Works to listed buildings fees

- virtual meeting and letter: £531
- site visit, follow up meeting and letter: £704

Medium development fees

- written advice only: £615
- virtual meeting and letter: £1,221
- site visit, follow up meeting and letter: £1,322

Larger scale development fees

- written advice only: £920
- virtual meeting and letter: £1,832
- site visit, follow up meeting and letter: £2,039

Major development fees

- £2,973

The fee covers:

- preliminary site visit by case officer
- internal meeting by case officer with internal services
- initial briefing by case officer to key members (where the case officer considers it necessary and proportionate to do so in liaison with those members)
- virtual meeting between developer and council teams (60 mins)
- written response (format to be agreed by the parties)

Strategic development fees

- £3,850

The fee covers:

- preliminary site visit by case officer
- internal meeting by case officer with internal services
- Initial briefing by case officer to key members (where the case officer considers it necessary and proportionate to do so in liaison with those members)
- virtual meeting between developer and council teams (120 mins)
- written response (format to be agreed by the parties)

Member engagement virtual session with the Planning Committees

An opportunity for applicants to present their scheme to Members of the Area planning committee prior to determination of a planning application. Usually at pre application stage.

- £1000

In order to qualify you must have or be going through a **Major development** or **Strategic development.**

The fee covers:

- A 45-minute Teams session with the relevant planning committee. Including a developers presentation lasting no longer than 20 mins.

- Please note that the timings for bringing a proposal to a Members Engagement session will be at the discretion of the planning officer.

Requests for compliance with planning conditions

- householder developments: £43
- non-householder developments: £145

Additional fees for senior officer involvement for major development proposals

Virtual meeting between developer and council teams (60 mins)

- to include Team Leader: additional £129
- to include Development Manager: additional £149
- to include Team Leader and Development Manager: additional £278

Additional fees for senior officer involvement for strategic development proposals

Virtual meeting between developer and council teams including case officer (up to two hours):

- to include Team Leader: additional £129
- to include Development Manager: additional £149
- to include Team Leader and Development Manager: additional £278
- to include Head of Planning: additional £179
- to include Team Leader or Development Manager and Head of Planning: additional £348
- to include Director of Planning, Housing and Environmental Health: additional £199
- to include Head of Planning and Director of Planning, Housing and Environmental Health: additional £378
- to include either Leader of the Council/Chief Executive and Head of Planning and Director of Planning, Housing and Environmental Health: additional £485

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Housing and Planning Scrutiny Select Committee

15 July 2025

Part 1 - Public

Matters for Cabinet - Key Decision

Cabinet Member	Cllr Mike Taylor – Cabinet Member for Planning
Responsible Officer	Eleanor Hoyle – Director of Planning, Housing and Environmental Health
Report Author	Kelly Sharp – Planning Policy Manager

Heritage Information and Advice to Support the Local Plan including Information in relation to Conservation Areas

1 Summary and Purpose of Report

1.1 The purpose of this report is to set out to Members the approach the Council should take in relation to obtaining heritage information and evidence to support the emerging Local Plan including progressing work on Conservation Area statements and Appraisals. In doing so, the report also considers advice from the Heritage Strategy that was produced in 2024 to support the emerging Local Plan. Legal advice has also been sought on the approach as set out in this report. The report first addresses the matter of Conservation Area Appraisals and then presents this in the context of information and evidence required to support the Local Plan to ensure that a sound local plan is submitted for examination.

2 Corporate Strategy Priority Area

2.1 The report will contribute to the following corporate priorities:

- Improving housing options for local people whilst protecting our outdoor areas of importance.
- Efficient services for all our residents, maintaining an effective council.
- Sustaining a borough which cares for the environment.

2.2 Information and evidence on heritage matters including Conservation Area Statements / Appraisals will provide information to help inform future change, development and design with regards to the sensitivities of the borough's historic environment and its unique character ensuring that development can make a positive contribution to local character and distinctiveness as set out in the NPPF (paragraph 203). Local Plans should set out a positive strategy in that regard.

3 Recommendations

3.1 HPSSC is asked to recommend to Cabinet:

3.1.1 To agree the approach set out within this paper to progressing heritage information and evidence to support the local plan.

3.1.2 To agree the approach to progressing Conservation Area Statements for those areas considered to be a priority to support the Local Plan (table 3).

3.1.3 To note that as part of the evidence gathering approach for the Local Plan that work will be progressed in relation to identifying any heritage issues as relevant to potential site allocations within the Local Plan process to ensure that sufficient information is provided at each key stage of the Local Plan process.

3.1.4 To agree the priority in progressing the additional work between the various Conservation Areas as per Annex 1.

3.1.5 To agree the Council will either (a) or (b):

- (a) produce short Conservation Area Statements for <u>all Conservation Areas</u> that do not currently have a Conservation Area Appraisal as a starting point to ensure that information is available for all Conservation Areas in the borough. Please note that this will be at extra cost and this will take both financial and staffing resource away from progressing full Conservation Area Appraisals for those that do not currently have one or where appraisals require a review and update.

  OR

- (b) <u>not take forward</u> Conservation Area Statements (for those non priority Conservation Areas) at extra cost for the remaining non-priority areas and instead produce full Conservation Area Appraisals where necessary in the order of priority set out at Annex 1.

3.2 To note the Heritage Strategy which will be made publicly available following the meeting.

4 Introduction and Background

4.1 The NPPF looks to local plans to set out a positive strategy for the conservation and enjoyment of the historic environment that includes recognising the desirability of sustaining and enhancing the significance of heritage assets, considers the wider social, cultural, economic and environmental benefits that conservation of the historic environment can provide and the positive contribution

to local character, distinctiveness and character of place that the historic environment can bring and that new development should make[1].

4.2 The NPPF defines heritage assets as “A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)”. Designated heritage assets include “World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation and a non-designated asset includes “buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets”.

4.3 Conservation Areas are a designated heritage asset and are designated and maintained by the local authority to cover areas of special historic or architectural interest. The designation provides recognition in the planning process of the special character of an area and ensures that preservation or enhancement of this character is a priority in decision making. Under s.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 when determining planning applications which affect a Conservation Area, the Council is required to pay “special attention… to the desirability of preserving or enhancing the character or appearance of that area” There are 60 Conservation Areas in the borough, with the majority of these covering historic village cores, hamlets, parkland, and areas of historic townscape. Each Conservation Area will have been formally designated on the basis that is has sufficient special architectural or historic interest to justify its designation.

5 Legislative and policy position relating to the historic environment and plan-making

5.1 In line with the NPPF as set out above in section 4, the PPG[2] advises that in developing the local plan strategy, specific opportunities should be identified to conserve and enhance heritage assets and their setting. This can include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness, with particular regard given to the prevailing styles of design and use of materials in a local area.

5.2 The PPG goes on to say that “the delivery of the strategy may require the development of specific policies, for example, in relation to use of buildings and design of new development and infrastructure”. In addition, the relationship and

[1] NPPF, Paragraph 203
[2] PPG Paragraph: 003 Reference ID: 18a-003-20190723

impact of other policies on the delivery of the strategy for conservation will also need to be considered.

5.3 The NPPF states at Paragraph 205 that “Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area”.

5.4 In relation to the evidence that is required to plan for the conservation and enhancement of the historic environment, PPG[3] provides that

> “Planning policies need to be based on up-to-date evidence about the historic environment in their area. Strategic policy-making authorities can use this evidence to assess the significance of heritage assets and the contribution they make to their environment and to predict the likelihood of currently unidentified heritage assets being discovered in the future. Authorities may draw on a wide range of evidence sources, including the relevant historic environment record, the National Heritage List for England, conservation area management plans and appraisals, and local consultations that have identified assets of local historic importance[4].

5.5 In relation to Conservation Areas, the PPG ‘Historic Environment’ states that local planning authorities must review their Conservation Areas from time to time as per (section 69(2)) of the Planning (Listed Buildings and Conservation Areas) Act 1990). The relevant guidance from Historic England 2019[5] advises that “Resources permitting, [review] every five years is ideal, but review frequency will vary according to the development pressures in the local area” (section 7 of Advice Note).

5.6 In relation to plan-making, there is no specific policy requirement for local planning authorities to have in place Conservation Area Appraisals prior to the preparation or adoption of a Local Plan. However, the impact of potential development on a Conservation Area or its setting does need to be understood to ensure sustainable development and to ensure that harm is minimised.

5.7 Given the above, it is recognised that evidence relating to the historic environment is required to support the Council’s emerging policy approach and to ensure that this evidence is as up-to-date and as robust as possible. Such evidence will also need to be alive of any site-specific issues, where detailed consideration of sites and any relevant Conservation Areas, where proposed development may have a significant impact on the Conservation Area will need to be understood as part of

[3] PPG Paragraph 045 Reference ID:61-045-20190315
[4] See also ID:18a-20190723 which demonstrates the need for up to date evidence in setting out a positive strategy in a local plan for conservation and enjoyment of the historic environment, identifying specific opportunities for conservation and enhancement of heritage assets, including their setting.
[5] Conservation Area Appraisal, Designation and Management Second edition, Historic England Advice Note 1

the Council's policy approach. The HE guidance above provides one detailed approach for how those kinds of issues might be addressed.

5.8 It is worth noting that as per paragraph 32 of the NPPF that evidence 'should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned….'.. The NPPF also defines 'justified' as 'an appropriate strategy, taking into account reasonable alternatives, and based on proportionate evidence'.

5.9 In addition, information relating to the historic environment including Conservation Areas is also required to help inform decision making where applications have potential to affect heritage assets.

6 Heritage information and evidence to support the Local Plan

6.1 As per sections 4 and 5 of this report, heritage information is required to support the emerging Local Plan and its policies.

6.2 To help inform the Local Plan, the Council progressed a Tonbridge and Malling Heritage Strategy in 2024. This is provided at Annex 2 for information and will be provided publicly on the Council's Local Plan evidence base pages following this Committee. The Heritage Strategy is a Local Plan evidence base document and there is no requirement to formally adopt the Strategy.

6.3 The aim of the Heritage Strategy is to provide an evidence base and vision for the borough's historic environment. Part two of the Strategy considers how heritage can be a positive driver for change, sets out challenges and responses to address these, which then feed into a number of strategic aims and next steps.

6.4 To date the Heritage Strategy has been used to help inform emerging draft local plan policies to ensure the plan provides a positive strategy for the conservation and enjoyment of the historic environment. It has also been used to help inform the approach that we will take to ensure that relevant and up-to-date information is available to support the local plan, of which this is one of the strategy's strategic aims (page 29).

6.5 In relation to Conservation Areas, the Heritage Strategy provides two recommendations. Recommendation 1A (page 30) – Develop a plan to ensure Conservation Area Appraisals are created and updated. The justification is to understand heritage assets as these are key to ensuring they are properly addressed in local plan writing and decision making. The Strategy identifies next steps as set out in the table below:

	Next Steps	**Status**
1.	Identify priority Conservation Areas which are under greatest development pressure	Complete

	Next Steps	Status
2.	Enquire with Historic England as to potential funding for resourcing or training regarding the production of Appraisals	Skills Funding obtained and used to progress four appraisals in 2024/25. There is no further funding available.
3.	Identify appropriate resource and timetable for producing short character statements or appraisals for the priority Conservation Areas	Underway
4.	Produce short character statements for priority Conservation Areas	Project to be procured
5.	Decide whether to roll out character statements for remaining Conservation Areas OR convert short character statements for priority Conservation Areas into full Appraisals	To be progressed

6.6 The second recommendation directly related to the local plan is Recommendation 3B – Ensure the historic environment is appropriately addressed in Local Plan site allocations. The rationale behind this is that the site selection process should take account of heritage assets prior to their allocation through identifying, at a high level, risks of harming heritage assets and ways that heritage assets can be conserved and enhanced whilst enabling sustainable development. The next steps identified in the report are set out in the below table:

	Next steps	Status
1.	Identify strategic site allocations	Progressing
2.	Undertake heritage appraisals to inform capacity and spatial arrangement of strategic site allocations. These heritage appraisals should identify potential harm to heritage assets, ways that sustainable development could be achieved which minimises the risk of harm	Officer desk based and site visits undertaken, including understanding (high-level) whether sites have any known or are appreciated to have high levels of heritage value and whether development would result in any potential harm to heritage assets and/or the extent to which this could

	Next steps	Status
	and opportunities to conserve and enhance heritage assets.	be mitigated or whether development should be avoided. Advice is being sought from consultants to understand whether heritage assets would affect the overall deliverability of a site and opportunities to conserve and enhance heritage assets. Further detailed work to be progressed in collaboration with site promoters also and the extent to which this could be mitigated.
3.	Consider the need for high level appraisals of smaller potential site allocations where there may be a significant risk of harming heritage assets.	Officer desk based and site visits undertaken, including understanding (high level) any potential harm to heritage assets and whether this can be mitigated. Advice is being sought from consultants to understand whether heritage assets would affect the overall deliverability of a site and opportunities to conserve and enhance heritage assets.

6.7 As per the above, information relating to heritage assets including Conservation Areas is being progressed to support policy formulation and the Local Plan at Examination.

7 Proposal for information and evidence relating to Conservation Areas

7.1 In recognising the national policy requirement for heritage information and evidence to support the emerging Local Plan, the Local Plan budget, which was reported to HPSSC in February 2025 identified £40k per year to progress Heritage advice and Conservation Area Statements / Appraisals within the borough.

7.2 In 2024 the Council received £25k from the Government's Planning Skills Fund and has progressed four Conservation Area Appraisals including Hadlow and Hadlow Freehold, New Barns and Broadwater and Aylesford. Whilst consultation is required on these latest Conservation Area Appraisals, 20 out of 60 Conservation Areas now have an appraisal that details the aspects of their

character which make them significant. However, 16 of these appraisals were published some time ago (between 2001 and 2011). Given Historic England's advice, the 16 appraisals require a review to ensure they provide up-to-date information. There are 40 Conservation Areas that do not currently have a statement / appraisal at all.

7.3 Annex 1 sets out each Conservation Area within the borough, the size of the Conservation Area and whether a Conservation Area Appraisal already exists and the date of the appraisal, where one has been undertaken previously.

7.4 We have considered in detail how best to progress the evidence that is required to ensure that the local plan can be found sound in relation to the historic environment and Conservation Areas. The factors we have considered include the following:

- Whether information is available through an existing Conservation Area appraisal, no matter the date of the appraisal, therefore providing information on the special characteristics of the Conservation Area that can be used in planning considerations;
- The location of the Conservation Area, in particular whether the Conservation Area is located either within or adjacent to an emerging sustainable settlement[6], where development (subject to other policy considerations), would generally be accepted at a sustainable settlement that has a built-up settlement confines boundary;
- Likely development pressure either through the submission of planning applications and / or through potential development options that may be progressed through the emerging local plan;
- A consideration of development quantum's and potential strategic sites, where it is more likely that there will be more development pressure in the boroughs more sustainable locations than rural locations and opportunities to enhance and conserve the historic environment; and
- The size of the Conservation Area.

7.5 Taking into account these considerations as well as advice from the heritage strategy, four phases to obtaining Conservation Area information and evidence have been identified as below.

(1) To gather information and evidence for those Conservation Areas that are located within or adjacent to a sustainable settlement in the emerging Local Plan,

[6] Please see Annex 3 which sets out the emerging settlement hierarchy and settlements considered to be sustainable.

that do not currently have a Conservation Area appraisal. There are 14 in this phase.

(2) To update and review Conservation Area Appraisals for Conservation Areas that are located within or adjacent to a sustainable settlement in the emerging Local Plan that have a dated Conservation Area appraisal. There are 8 in this phase.

(3) To gather information and evidence for Conservation Areas that are located in a rural location that do not currently have an appraisal. There are 27 in this phase.

(4) To update and review Conservation Area Appraisals for Conservation Areas that are located in a rural location that have a dated Conservation Area appraisal. There are 7 in this phase.

7.5.1 A priority for the Council is to ensure that information and evidence is available to support the emerging Local Plan. Obtaining full Conservation Area Appraisals either new or updated for 60 Conservation Areas is not achievable within the Local Plan timetable where a plan is due to be submitted by December 2026. However, it will be possible to obtain Conservation Area Character Statements for priority areas (see Table 3 below) to support the Local Plan. This work will provide sufficient information in which to support the plan and will also provide information to aid decision-making, in the absence of full Conservation Area Appraisals. Each statement will provide the special interest of each Conservation Area and a map showing all heritage designations plus key views. It is envisaged that this piece of work may cost in the region of £20-30k and can be undertaken in line with this year's budget allocation.

7.5.2 In addition, work will also be progressed in relation to identifying any heritage issues as relevant to potential site allocations within the Local Plan process to ensure that sufficient information is provided at each key stage of the Local Plan process. This includes at Regulation 18 stage. Funding is also available for this area of work.

7.5.3 To ensure that information and evidence is available to support the local plan the following Conservation Area statements will be progressed as a priority.

Conservation Area	**Size (ha)**
Snoll Hatch East Peckham	3.16
Wateringbury	61.41
Wateringbury Station	1.07
Clare Park And Blacklands	18.36
Birling	5.33
Butts Hill Wrotham	0.59
Ightham	26.52

Conservation Area	Size (ha)
Platt	9.80
Plaxtol	20.42
Ryarsh Village	4.46
The Street Mereworth	4.27
Wrotham	22.29
Holborough Mill Snodland	3.22
Haysden	2.98

7.5.4 In relation to next steps, there are options. The Council can either continue to progress Conservation Area character statements for all Conservation Areas that currently do not have a Conservation Area Appraisal to ensure that sufficient information is available for decision making at a quicker pace or it can start to progress full Conservation Area Appraisals and update and review existing Conservation Area Appraisals. Existing Conservation Area Appraisals are available to view on the TMBC website for reference.

7.5.5 The table provided at Annex 1, whether Conservation Area Statements are progressed or whether full appraisals are progressed first, sets out the order in which Statement and / or Appraisals will be prepared / updated. This accounts for the evidence and information required for the local plan as well as the phasing as detailed above. Please note that where a Conservation Area Statement is prepared, it may be considered necessary to progress full Conservation Area Appraisals as well. Conservation Area Statements are intended as a proportionate temporary measure to ensure that information is available in the absence of a full Conservation Area Appraisal. For those non-priorty areas, progressing Conservation Area Statements is not an evidence base requirement for the Local Plan.

7.5.6 There are a number of Conservation Areas that are in close proximity to each other where it should be possible to prepare these together. These are indicated within the table at Annex 1 also.

7.5.7 In relation to non-priority Conservation Area Statements / Appraisals, the aim is to progress a number of statements / appraisals per year. Within the budget identified.

7.5.8 For the 2025/2026 financial year, the focus and budget will need to be allocated to progressing Conservation Area Statements. It will need to be determined once costs are received on how many Conservation Area Statements / Appraisals can be progressed in the 2026/2027 financial year, also taking into account any other heritage advice that may be required to support the Local Plan.

7.5.10 Given that the Council does not employ a Conservation and Design Officer, work is planned to be outsourced to a suitable and expert heritage and design

consultancy, with work being overseen by the planning policy team in liaison with advice from the Conservation and Design team at Sevenoaks District Council. With current resources in the planning policy team and the focus that is required to progress the Local Plan, it will be difficult to support consultants to progress more than 4-7 Conservation Area Appraisals per year. The capacity within the team to progress additional projects is already at its limit given the Local Plan work Programme.

8 Other Options

8.1 It is a national policy requirement for Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.

8.2 This report has set out how it intends to progress historic environment information and evidence to support the Local Plan including progressing / reviewing and updating Conservation Area Statements / appraisals for the 60 Conservation Areas that are designated in the borough.

8.3 As described above, an alternative option to progressing full Conservation Areas Appraisals in the short-term is to progress Conservation Area Character Statements for Conservation Areas that do not currently have a Conservation Area Appraisal, which the Council will need to progress at a minimum for its priority areas to support the Local Plan.

8.4 Producing Conservation Area Statements for priority areas is a necessity to ensure a sound Local Plan, however, it is not necessary to progress these for the non-priority areas. However, producing Statements for those non-priority areas could achieve more coverage within a shorter time period. However, it would also take resources away from progressing full Conservation Area Appraisals. Please note that progressing Conservation Area Appraisals, even if a Statement is produced, will need to be progressed in any case, particularly for those Conservation Areas identified in Phase A and Phase B as set out in Annex 1.

9 Financial and Value for Money Considerations

9.1 The Local Plan budget identified £40k per year for heritage information and evidence and related work including Conservation Area appraisals. There is also a remaining budget of £7,783 which the Council will use to obtain advice relating to potential site allocations.

9.2 Future work in relation to Conservation Areas will be progressed through a compliant procurement route, which will ensure that value for money is achieved.

10 Risk Assessment

10.1 Heritage information is required to support plan making. There is a risk that should this not be available or the right information not being available for priority

Conservation Areas then the plan could be found unsound at examination, due to being non-compliant with the NPPF.

11 Legal Implications

11.1 Local Planning Authorities are required to prepare and keep an up to date a development plan for their area. The Planning and Compulsory Purchase 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) set out the requirements and the statutory process for the preparation of a Local Plan.

11.2 There are no further legal implications in relation to Conservation Area Appraisals as per section 5 above.

12 Consultation and Communications

12.1 Where new Conservation Area appraisals are undertaken it is good practice to consult on the appraisals with the community. Three new appraisals have been undertaken and consultation on these will be undertaken in due course prior to the appraisals being finalised.

13 Implementation

13.1 Certain work relating to heritage assets including Conservation Areas that are located near to proposed allocated sites in the emerging local plan will require evidence to support the emerging local plan. Work streams relating to this therefore need to be implemented to achieve this as a priority. Non-priority Conservation Area Statements / Appraisals can be progressed also, subject to available budget. However, budget will not be available to progress work on non-priority Conservation Area's this financial year. How Conservation Area Statements / Appraisals will be progressed is detailed in Annex 1.

14 Cross Cutting Issues

14.1 Climate Change and Biodiversity

14.1.1 Limited or low impact on emissions and environment.

14.1.2 Climate change advice has not been sought in the preparation of the options and recommendations in this report.

14.2 Equalities and Diversity

14.2.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

14.3 Other If Relevant

- Human Resources

- Procurement

14.3.1 The work required will require the procurement of services. It will also require the work streams to be resourced by officers within the planning policy team. In progressing full Conservation Area Appraisals, this will create an additional workstream at a time when capacity is low given the timelines to progress a local plan by December 2026.

Background Papers	Conservation Area Appraisal, Designation and Management Second edition, Historic England Advice Note 1
Annexes	Annex 1 TMBC Conservation Areas and priorities Annex 2 Tonbridge and Malling Heritage Strategy Annex 3 Draft Settlement Hierarchy

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Annex 1 Conservation Area Appraisal / Statement Priority List

Conservation Area Name	Conservation Area size (ha)	Appraisal Date	Being updated?	Settlement Category	Ranking	Conservation Area Character Statement	Priority for full CAAMP or Statement within each ranking or statement
Aylesford	25.12	2025	Yes	N/A - underway	In progress		
Hadlow	8.53	2011 / 2025	Yes	N/A - underway	In progress		
New Barns And Broadwater Farr	12.47	2025	Yes	N/A - underway	In progress		
The Freehold Hadlow	1.32	2025	Yes	N/A - underway	In progress		
Holborough Mill Snodland	3.22			Service Centre	A	Priority	1
Snoll Hatch East Peckham	3.16			Primary Village	A	Priority	2
Wrotham	22.29			Secondary Village	A	Priority	3
Ryarsh Village	4.46			Secondary Village	A	Priority	4
Birling	5.33			Secondary Village	A	Priority	5
Ightham	26.52			Secondary Village	A	Priority	6
Plaxtol	20.42			Secondary Village	A	Priority	7
Haysden	2.98			Not categorised	A	Priority	8
Wateringbury	61.41			Primary Village	A	Priority	9
Clare Park And Blacklands	18.36			Principal Service Centre	A	Priority	10
Platt	9.80			Secondary Village	A	Priority	11
The Street Mereworth	4.27			Secondary Village	A	Priority	12
Wateringbury Station	1.07			Primary Village	A	Priority	13
Butts Hill Wrotham	0.59			Secondary Village	A	Priority	14
West Malling	96.85	2002		Service Centre	B	Priority	1
Hildenborough	5.81	2011		Primary Village	B	Priority	2
Mill Street East Malling	12.30	2001		Primary Village	B	Priority	3
East Malling Village	8.89	2004		Primary Village	B	Priority	3
Paddlesworth Snodland	1.72	2001		Service Centre	B	Priority	4
Bullen Corner East Peckham	1.98	2011		Primary Village	B	Priority	5

Quarry Hill Tonbridge	11.91	2010		Principal Service Centre	B	Priority	6
Tonbridge	72.26	2009		Principal Service Centre	B	Priority	7
Fairlawne	164.12				C		1
Mereworth Castle	137.49				C		2
Oxenhoath And Hamptons	69.24				C		3
North Frith Hadlow	34.28				C		4
Shipbourne	24.70				C		5
Oldbury	20.46				C		6
Bradbourne East Malling	18.67				C		7
Yotes Court	18.06				C		8
Stansted	17.72	2002			C		9
Roydon East Peckham	17.40				C		10
Trottiscliffe	14.36				C		11
Coldharbour Hildenborough	12.06				C		12
Addington	11.33				C		13
Snodland	9.54	2001			C		14
Holtwood Aylesford	9.22	2011			C		15
Offham Church	9.01				C		16
Offham	8.98				C		17
West Peckham	8.89				C		18
Ightham Mote	7.70				C		19
Old Soar And Allens Plaxtol	7.26				C		20
Fairseat	6.51				C		21
Roughway Plaxtol	5.33				C		22
Little Mill East Peckham	4.93				C		23
Aldon Offham	4.52				C		24
Ditton	4.45	2004			C		25
Pizien Well Wateringbury	3.91				C		26
Birling Place	3.79				C		27
Ivy Hatch	2.82	2001			D		28
Wrotham Water	2.81				D		29

Claygate Cross Plaxtol	2.40				D		30
Budds Green Shipbourne	2.35				D		31
Butchers Lane Mereworth	1.82				D		32
Larkfield Church	0.85	2011			D		33
Cobdown Farm Ditton	0.74	2011			D		34

Annex 2

Tonbridge and Malling Heritage Strategy

Tonbridge and Malling Borough Council

Ightham Mote (National Trust) © Steve Payne

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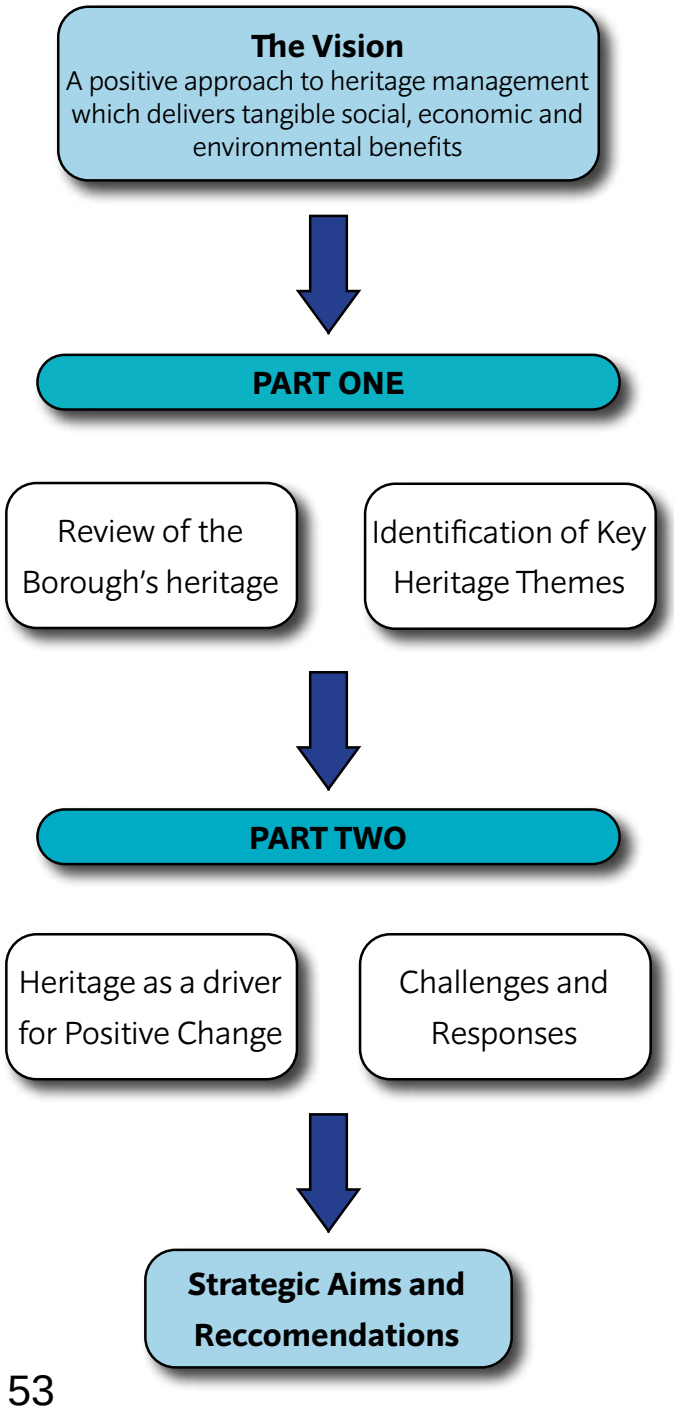
INTRODUCTION

*The aim of the Tonbridge and Malling Heritage Strategy is to provide an evidence-based **Vision** for the Borough's historic environment to inform and support the Local Plan. Part One will identify and assess heritage within the Borough, and outline a set of key heritage **'Themes',** which characterise the Borough's unique heritage. This is followed in Part Two by a plan for a **Positive Strategy**, which includes examination of how heritage can be a driver for **Positive Change** within the borough, followed by a list of the **Challenges** facing the borough's heritage and potential **Responses** to address these. The Strategy's findings will feed into the **Strategic Aims** which will set out the Council's next steps.*

The aim of this Heritage Strategy is to provide an evidence-based vision for the Borough's heritage and to inform and support the Local Plan. Production of the Strategy has incorporated input from officers at Tonbridge and Malling Borough Council. The Strategy has been prepared in line with the requirements set out in the National Planning Policy Framework (NPPF), in particular paragraph 190 which states that

"Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats".

Further information about the national and local planning policy context is set out in Appendix 1. Historic England's Good Practice Advice Note: The Historic Environment in Local Plans (GPA1) has also guided production of the strategy.



INTRODUCTION


Ightham Mote garden © Max Letek

Tonbridge and Malling is a non-metropolitan district in Kent with borough status, formed in 1974. The Borough's heritage stretches significantly further back and is legible within the existing historic environment, invoking a rich and diverse history that is unique to the Borough and its sense of place. Prehistory in the Borough is represented by numerous monuments and archaeological sites, many of which have been nationally designated. The Medway Megaliths are remains of a monument building culture specific to the region and not seen across other areas of Kent. The Roman invasion of 43AD brought the region into the broader Roman world, remnants of which can still be found in the Borough's archaeological record. Following Roman occupation, the area's defining medieval identity began to take shape, with the borough still attributing much of its character to the survival of medieval settlements, townscapes, manor houses, farmsteads, and religious institutions. The Industrial Revolution introduced new industries to the previously rural agricultural landscape, which precipitated a large increase in population and settlement. The Borough played key strategic roles during the World Wars, with RAF West Malling serving as a base for historically significant operations. These factors have helped shape the existing character of Tonbridge and Malling today.

Strategy Content

Part One begins by exploring the Borough's unique heritage, including an overview of designated and non-designated heritage assets within the Borough (with further detail provided in Appendix B). Part One goes on to set out a series of heritage 'Themes' which characterise the Borough's distinct historic environment. Part One then goes on to assess heritage at-risk in the Borough. In addition to the Borough's known heritage, Part One also highlights areas where knowledge and understanding of heritage requires further understanding and data collection. This is particularly the case with non-designated heritage and at-risk heritage. The Strategy explores several ways that this knowledge can be supplemented.

Part Two aims to conceptualise a positive approach to managing Tonbridge and Malling's heritage, by looking at the social, economic and environmental benefits that the historic environment bring to the Borough. Part Two lays out the main challenges facing the Borough's heritage and suggests potential strategic responses to address these challenges. Part Two concludes with a series of Strategic Aims which are based on the positive approach set out before and are intended to empower the Council to achieve its vision for the historic environment.
This is the first Heritage Strategy to be embraced by Tonbridge and Malling Borough Council. The Strategy works on the principle that heritage contributes to the Borough's distinct sense of place, enriches the lives of locals and enhances the experience of visitors to the area. At the heart of this Strategy is a vision for a positive approach to heritage management which delivers tangible social, economic and environmental benefits. In this sense, the Strategy views heritage as having intrinsic value but also a means to achieve the Council's other strategic aims.

This strategy hopes to achieve this vision by:

- **Building a stronger understanding of the Borough's heritage** through compiling information on areas of heritage currently less well understood and identifying key pressures impacting the Borough's heritage.
- **Recognise the benefits that heritage brings** to the Borough for communities, personal well-being, the economy and the environment.
- **Improve recognition of heritage** in local planning and among the public, through implementation of robust heritage policy in the Local Plan and public promotion of the Borough's unique heritage.
- **Propose a series of Strategic Aims based on a positive approach**, providing a response to challenges facing the Borough's heritage, targeting improvement opportunities and seeking to deliver positive heritage outcomes that align with the Council's other strategic aims.

PART ONE: THE HERITAGE OF TONBRIDGE AND MALLING

Tonbridge Castle © Julie Clarke

The Borough of Tonbridge and Malling

Tonbridge and Malling is a non-metropolitan district with Borough status located in the west of the county of Kent. The Medway River runs south to north through the Borough. The main settlement located on the river is Tonbridge, located in the south of the Borough. Most of the Borough comprises rural agricultural fields populated with numerous small rural settlements, interspersed by larger historic parks. The north of the Borough falls within the Kent Downs Area of Outstanding Natural Beauty (AONB) and a small section of the south edge of the Borough falls within the High Weald AONB.

The Borough has a significant location within the County of Kent, located north of the Weald whilst also falling south of the coastal plain and the major historic east-west routes across Kent, including Roman Watling Street and Medieval Pilgrims Way. These have influenced the area throughout history.

Types of Heritage Assets

Heritage assets are defined by the NPPF Glossary as:

"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decision, because of its heritage interest. Heritage asset includes designated heritage and assets identified by the local planning authority (including local listing)". [1]

Designated heritage assets

Designation, according to Historic England is:

"The recognition of particular heritage value(s) of a significant place by giving it formal status under law or policy intended to sustain those values". [2]

A number of the heritage assets in Tonbridge and Malling have had their heritage value recognised through their inclusion of the National Heritage List for England (NHLE). Types of designation in the Borough include:

- Listed Buildings
- Conservation Areas
- Scheduled Monuments
- Registered Parks and Gardens



Ightham Mote © Brian Toward

1 Pg 67. MHCLG, 2021, National Planning Policy Framework

2 Historic England website, Heritage Definitions, accessed via https://historicengland.org.uk/advice/hpg/hpr-definitions/

Listed Buildings

Historic England maintains a national list of buildings and structures considered to be of special architectural or historic interest, affording them statutory protection[3] and consideration in the planning process. List entries are graded as Grade I, II* or II depending on their significance, with Grade I and II* being of the highest significance. In Tonbridge and Malling there are 1318 Listed Buildings, over 90% of which are Grade II, 5% are Grade II* and 3% are Grade I.

Conservation Areas

Conservation Areas are designated and maintained by the local authority to cover areas of special historic or architectural interest. The designation provides recognition in the planning process of the special character of an area and ensures that preservation or enhancement of this character is a priority in decision making. There are 60 Conservation Areas in the Borough, with the majority of these covering historic village cores, hamlets, parkland, and areas of historic townscape. Sixteen of the Borough's Conservation Areas have published appraisals that detail the aspects of their character which make them significant, many of which were published over 15 years ago. The remaining 44 do not have published appraisals, although some of these have had informal write-ups prepared by local groups.

Registered Parks and Gardens

Historic England maintains a register of parks and gardens of special historic interest, with the emphasis being on gardens, grounds and open designed spaces. Registered Parks and Gardens are graded as Grade I, II* or II depending on their significance, with Grade I and II* being of the highest significance. In Tonbridge and Malling there are five Registered Parks and Gardens. Two of these are Grade II* and include Mereworth Castle and Oxen Hoath, both of which are also designated as Conservation Areas. The other three are Grade II and include Somerhill, Mabledon and Ightham Court. Somerhill and Mabledon straddle both the Borough and the Tunbridge Wells authority to the south.

Scheduled Monuments

Archaeological sites and monuments of national significance can be designated as Scheduled Monuments, providing them legal protection by regulating activities or operations which may affect their survival and preservation.[4] There are 25 Scheduled Monuments in the Borough, the majority of these being medieval or prehistoric in date. Scheduled Monuments are not given grades but are considered to be of the highest significance alongside Grade I and II* Listed Buildings / Registered Parks. Remains can be visible above ground, entirely below ground, or a combination of both. Just some of the Scheduled Monuments in the Borough include Eccles Roman Villa, Tonbridge Castle, the White Horse Stone, Oldbury Hill, Ightham Mote and St Mary's Abbey. A full list is provided in Appendix 2.

3 Planning (Listed Buildings and Conservation Areas) Act 1990

4 Ancient Monuments and Archaeological Areas Act 1979

Non-designated heritage assets

Non-designated heritage assets are defined by Planning Practice Guidance as:

"Buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not formally designated heritage assets. In some areas, local authorities identify some non-designated heritage assets as 'locally listed'". [5]

Not all heritage assets in the Borough have been designated, either because their significance has only recently been highlighted, not yet explored, or does not currently meet the threshold for designation. These assets make up a large portion of Borough's heritage and still require consideration in the planning process. Non-designated heritage assets make a significant contribution to the historic environment and character of the Borough, enhancing its distinctiveness and sense of place.

Types of non-designated heritage assets are wide ranging. Unlike designated heritage assets, information on the Borough's non-designated heritage assets is not readily accessible via unified open database or a simple list. Some information is help by disparate organisations and groups and some is known about through more official datasets. The potential sources of information regarding non-designated heritage assets is set out below.



5 Planning Practice Guidance, Historic environment, 2019

Non-designated heritage assets continued

Below is an exploration of common types of non-designated heritage asset in the Borough and established sources which hold information on them.

A local authority can opt to maintain a 'local list' to recognise and monitor non-designated buildings and structures of heritage significance. Tonbridge and Malling does not keep a local list. However, it is likely that certain groups and parish councils within the Borough currently keep their own unofficial 'neighbourhood' lists. In addition to this, Conservation Area Appraisals frequently identify local landmark buildings or buildings of local historical or architectural significance which contribute to an area's character. Existing resources such as these can be used to easily supplement the local authority's information.

Kent County Council maintains a comprehensive database of the county's historic environment called the Kent Historic Environment Record (KHER). This documents all known archaeological remains and a variety of other features which make up the historic environment. Archaeological remains make up the largest proportion of the Borough's non-designated heritage assets. This includes remains identified through aerial photography, desk-based assessment, archaeological survey, past reports and other historical records.

Examples of entries in the KHER within the Borough include:

- Archaeological events
- Archaeological features
- Archaeological sources of information
- Find spots
- Monuments
- Historic buildings
- Historic parks/gardens
- Historic landscape features

Kent County Council, in partnership with the Kent Gardens Trust, created a county wide register of parks and gardens considered to be of horticultural and historic importance, intended to inform local planning policy and decision making. The *Kent Gardens Compendium* has identified 40 such sites within the Borough (some of these are already identified as parks and gardens surrounding designated heritage assets). This resource, like the others described here, can be used to supplement knowledge of the Borough's local heritage and could potentially contribute to the creation of a local list.

Farmsteads are ubiquitous in Kent and contribute to the historic environment. These assets are covered by management guidance as laid out in the *Kent Farmsteads Guidance* document, published in 2014 by English Heritage (now Historic England) in partnership with Kent County Council and the High Weald and Kent Downs AONB partnerships. The document is intended to provide guidance on the conservation management of historic farms across Kent given the functional and material changes that have been occurring to them over recent years. This resource is available to the Council to aid in understanding this defining aspect of the Borough's heritage and guide management of these farm sites. This is explored further in the following section.

Information on the heritage of the Medway Gap was compiled by the *Valley of Visions*[6] landscape partnership scheme. The aim of the scheme was to conserve the landscape, wildlife and heritage of the Medway Gap through partnership working with numerous stakeholders. The scheme is no longer active but its research provides a strong base for understanding the heritage, particularly industrial heritage, of the Medway Gap in the north of the Borough.

6 Valley of Visions Landscape Partnership Scheme

Non-designated heritage assets continued

Provisions for archaeology should be incorporated into the local plan. In most instances, archaeological remains are managed through conditional measures such as avoiding development in archaeologically sensitive areas or recording of remains prior to their removal. In rare circumstances, the significance of archaeological remains could require protective measures, including avoidance of development or statutory designation.

The varied and often disparate ways in which non-designated heritage assets are recorded makes monitoring them significantly harder, thus putting them at increased risk. In particular, a lack of knowledge or understanding of the Borough's non-designated heritage means that it is a higher risk of loss, either through inappropriate development or neglect. Supplementing this knowledge can begin to combat this risk, with a good starting point being to identify existing sources of information on the Borough's heritage such as the KHER, Kent Gardens Compendium, and unofficial local heritage lists. Heritage at risk is discussed in more depth on pg. 18.



Kits Coty House, William Stukeley 1722 © British Library

Key Heritage Themes

The many components which make up Tonbridge and Malling's historic environment have been grouped into six heritage 'Themes'. A thematic approach is helpful in highlighting the aspects of the Borough's heritage which contribute most to the Borough's sense of place and unique character.

The following Themes are not exhaustive and have been produced based on their distinctiveness, significance and contribution to the Borough's unique character. There is some overlap between some of these themes.

Heritage Themes

- **Prehistoric Landscape**
- **Medieval Origins**
- **Modern Military History**
- **'Garden of England' Country Houses**
- **Agriculture and Farmsteads**
- **Industries of the Medway Gap**



Oldbury Iron Age Hillfort © Brian Toward

Theme 1: Prehistoric Landscape

Tonbridge and Malling has a significant prehistory spanning millennia, as evidenced by a wealth of prehistoric sites and remains which survive across the district. Some of these assets have been formally designated as scheduled monuments, while many others have been recorded in the KHER.

One of the rarest and oldest sites is the designated Palaeolithic rock shelters at Oldbury Hill, which document some of the earliest pre-homo-sapiens activity in Britain. After centuries of broken periods of occupation, humans returned to Britain at the onset of the Holocene c. 12000 years ago. Evidence for these early hunter gatherers tends to be ephemeral – one such rare example in Tonbridge and Malling being the remains of a tool-making industry excavated at Addington.

For millennia, prior to the present day, the Medway River carved a valley through the chalkland, creating a wide fertile plain that was ideal for agriculture, which arrived in Britain around 6000 years ago. The early farming communities that settled the area were responsible for a number of nationally significant monuments, including the iconic 'Medway Megaliths'. These Neolithic monuments comprise six scheduled burial monuments, including Chestnuts Long Barrow, Kit's Coty House Long Barrow, Little Kit's Coty House Megalithic Tomb, Addington Long Barrow, Coldrum Megalithic Tomb, and the White Horse Stone. These monuments form part of a regionally distinct group of megaliths that are unique within Kent and share similarities with contemporary monument building traditions of south-west Britain.

The Medway Megaliths represent a particular monument building tradition that is unique within Kent, making many of the Borough's megalithic assets and associated archaeological remains of significant evidential importance. These monuments likely related to funerary rites and other ritual processes. It is likely that such monuments played a key role in configuring the unique regional ideologies and belief systems from this period.

The Bronze Age (2500–800 BC) and Iron Age (c. 800 BC–43 AD) saw an increase in competition over natural resources, signified by an increased focus on defensive sites. There was a move away from the large communal monuments of the Neolithic and an increased focus on defensive sites. Within the Borough, this building tradition is represented by two scheduled sites - the Iron Age hillfort at Oldbury Hill and an enclosed Iron Age farmstead at East Malling. Burial traditions continued to evolve over time, as represented by the scheduled Bronze Age Bowl Barrow at Mount Mead. Further evidence of this period is recorded in archaeological investigations across the Borough.

The Borough's prehistory slowly evolved and developed throughout the metal ages, reflecting broader trends across the rest of the UK. The Borough would also have been at the forefront of the abrupt end of prehistory, with the Roman invasion landing in Kent in 43 AD.

Visible prehistoric sites, such as those described above, are defining features within the landscape, providing a tangible connection to the region's prehistoric origins. The Borough contains a relatively high number of regionally and nationally significant sites, reflected in its high concentration of scheduled monuments.

Non-visible remains, generally recorded through archaeological investigation and held by the KHER, are an invaluable research tool and provide context to above ground remnants of the prehistoric landscape. Tonbridge and Malling's prehistory contributes to its unique sense of place and is an integral component of the historic rural landscape.



Coldrum Long Barrow © John K Thorne


Aylesford Bridge © John K Thorne

Theme 2: Medieval Origins

Tonbridge and Malling's medieval heritage contributes to its unique sense of place. The foundations for much of the Borough's landscape and built environment were established during this period, driven by agriculture in the fertile Medway Valley which led to the growth of agrarian villages, hamlets and isolated farmsteads. Although the Borough saw some significant changes during the industrial revolution, medieval settlement has maintained its integrity with many villages characterised by surviving medieval street patterns, nucleal churches, and other medieval buildings many of which have been included on the NHLE. Villages such as Aylesford and Ightham still contain these defining features despite more recent expansion, including an iconic medieval stone bridge crossing the Medway.

The Borough was a key seat of power during the medieval period, as evidenced by the large number of high status and strategic medieval buildings. Tonbridge Castle is among the most eye-catching and iconic of these monuments, originally granted to Richard Fitz Gilbert to guard the Medway crossing following the Norman Conquest. The keep includes a 13th Century stone structure pre-dating an earlier Norman motte and bailey, with the remains of the town defences to the north. The medieval core of Tonbridge is still laid out in relation to the castle and contains further surviving medieval buildings. Other grand fortified structures in the Borough include Ightham Mote, Leybourne Castle and St Leonard's Tower.

More evidence of the Borough's status as a medieval seat of power is the booming ecclesiastical presence in the area. Besides the large number of churches which continue to form the spatial and communal nucleus of many of the main settlements, there is also a surviving monastic presence in the Borough. Such institutions include St Mary's Abbey, an abbey of Benedictine nuns established in West Malling by Bishop Gundulf of Rochnester in 1090. Another leading religious institution is Aylesford Priory, a community of Carmelite Friars established in Aylesford in 1242. These institutions accept visitors who are drawn to the surviving religious orders as well as the historic architecture that houses them. Tonbridge Priory was established in the 10th century, but was dissolved in the 16th century and the above ground ruins were demolished in 1842 with the building of the South Eastern Railway.

Tonbridge and Malling has an interesting and unique medieval history which is appreciable in many aspects of the built environment. Protecting and conserving these assets and promoting their significance will enhance their contribution to the Borough's unique sense of place.


Tonbridge Castle © John K Thorne


RAF West Malling circa 1960 © Google Satellite Imagery

Theme 3: Modern Military History

Post-19th century military activity has made a significant contribution to the unique character of Tonbridge and Malling. Today, the Borough is home to an MOD military training area in Mereworth Woods, a restricted area covering a sizeable portion of land in the centre of the Borough. However, military activity in Tonbridge and Malling has roots going back to the First and Second World Wars.

The First World War mobilised most of British society and had a lasting impact on the men of the borough and their families. They are currently memorialised in the Memorial Garden of Tonbridge, which records the 400 Tonbridge men who perished during the First World War.

RAF West Malling was an RAF aviation base located just south of the town. The extensive site was established as a private airfield in the 1930s before being requisitioned by the RAF in 1940. The airfield was not considered ready to receive a squadron until the end of 1940 due to sustaining heavy bomb damage during the Battle of Britain. In April 1941, No. 29 Squadron and Bristol Beaufighters came to West Malling along with commander and later squadron leader Guy Gibson – who gives his name to the council owned Gibson Building. The Beaufighter was a night fighter and Gibson piloted several patrols from West Malling to intercept Luftwaffe aircraft, Gibson said of West Malling,

"Of all the airfields in Great Britain, here, many say, including myself, we have the most pleasant".

Gibson went on to lead Operation Chastise – the Dambusters Raid – for which he was awarded the Victoria Cross. The airfield continued to be of strategic importance throughout the war. The de Havilland Mosquito replaced Beaufighters as night fighters and proved effective at disrupting infrastructure in mainland Europe. West Malling also played a vital role in defending the capital during Operation Diver, with Spitfire aircraft based at the airfield intercepting many V-1 Flying Bombs targeting London.

After fulfilling a range of different functions, redevelopment of the airfield began in 1989 with the construction of the new village of Kings Hill. The design has aimed to retain and reflect aspects of West Malling's historic military character. The air traffic control tower, Grade II Listed, has been renovated and re-imagined as the Control Tower Cultural Centre. Businesses occupy the Barracks and Airmen's Institute, also both Grade II Listed, and the Council's offices are based in the Grade II former Officers Mess (Gibson Building). A number of surviving defensive installations have also been scheduled. A memorial to Group Captain Peter Townsend, who was appointed Commanding Officer of West Malling in 1943 and later served as equerry to George VI, has been erected in Townsend Square of the residential area.

The vital work carried out from West Malling can be a source of both local and national pride. The Kings Hill development has aimed to preserve and promote facets of West Malling's aviation infrastructure within the modern fabric, demonstrating that the Borough's military heritage has a legible place in current and future development. There are no doubt further opportunities to promote the Borough's proud military heritage.

Further to the RAF base, the Borough contains around 60 pillboxes along the Medway, the surviving remnants of the Borough's stretch of the General Headquarters Line. The GHQ Line, constructed in 1940, was a strategic defensive barrier running from Somerset to Kent that was designed to contain an expected German invasion. Kent in particular was a likely landing point for invasion, making this stretch of the Line particularly significant. These pillboxes survive to a high degree and are a significant group of assets representing another aspect of the Borough's proud military heritage.

Other key strategic Second World War sites located within the Borough, as mentioned in the KHER, include Royal Observer Corps posts at Borough Green, Snodland and Wateringbury, anti-aircraft installations at Holborough and Burham Court, an engineering and POW camp at Wouldham, as well as various anti vehicle obstacles dotted across the Borough.


Oxen Hoath, engraving 1719 © British Library

Theme 4: 'Garden of England' Country Houses

Tonbridge and Malling contains many historic country houses set within formal gardens and rural parkland. Moving through the landscape, such houses are frequent occurrences, serving as focus points within the landscape. While many of these sites are private and inaccessible to the public, they make a considerable contribution to the Borough's distinct sense of place.

The architecture of the Borough's country houses generally date to the post-medieval period, although several were built on the foundations of earlier manors, with some estates such as at Ightham Mote and Leybourne Castle retaining their original medieval features. The grounds attached to these houses are of equal significance, not only providing the country houses with an immediate context, but themselves existing as key historic features of the rural landscape. One of the district's most noteworthy examples, Mereworth Castle, includes 130 ha of designated formal garden and wooded parkland surrounding the domed Neo-Palladian house. To the west of this, Oxen Hoath manor house is surrounded by 110 ha of designated formal garden and parkland. Fairlawne is one of the district's largest estates, comprising over 160 ha of formal garden and parkland.


Oxen Hoath © John K Thorne

Tonbridge and Malling's country house tradition must be understood within the context of the district's rural setting, particularly in terms of the backdrop of the Kent Downs and High Weald AONBs. In addition to this, the Borough's proximity to London was also a key reason for the siting of such estates. These sites help to define the dynamic experience that comes from moving through the Borough's landscape and they contribute to Kent's status as the 'Garden of England'.


Wheat field near Tonbridge © Dmitrij Paskevic

Theme 5: Agriculture and Farmsteads

Historic farms and farm buildings are a common feature of the Kent countryside and this is also the case in Tonbridge and Malling. Agriculture formed the basis of the medieval rural economy and this Is reflected in the Borough's predominantly rural settlement pattern, which is dominated by small historic villages, hamlets and isolated farmsteads. Although the area saw significant growth during the industrial revolution, historic farms remain a defining feature of the local landscape. The approximately 600 farmsteads in the Borough are covered by management guidance as laid out in the *Kent Farmsteads Guidance* document, published in 2014 by English Heritage (now Historic England) in partnership with Kent County Council and the High Weald and Kent Downs AONB partnerships.

Farmsteads are buildings which serve as the main hub of a farmland division. Their varied forms reflects local traditions and agricultural practices, although typical components often include a main farmhouse, barns, granaries, cart sheds, stables, cattle yards, shelters and out-farms. The Borough has a high concentration of dispersed plan farmsteads in comparison to the rest of Kent, although the majority in the Borough are courtyard plan. Traditional farmsteads generally pre-date the 20th century and most in Kent date to the 19th century. However, Tonbridge and Malling is considered to have a high concentration of lesser altered older farmsteads in comparison to Kent and the rest of the country. Around 32% of farmsteads recorded in the Borough contain a 17th Century or earlier listed farmhouse, and 7% have at least one 17th Century or earlier listed working building. Around 52% of farmsteads recorded in the Borough retain over half of their historic form and are therefore considered to have a high heritage potential.

Farmsteads have a physical and functional relationship to the agricultural landscape, which in the Borough traditionally covers arable farming, livestock pasture, market gardening and hop production. This relationship to historical form and function has been eroded over recent years. As early as 2006, Tonbridge and Malling reportedly had above average rates of conversion of listed farm buildings. Further, with the decline of hop production, archetypal oast houses which were used in the hop drying process have been converted to other uses, mainly housing. The 2014 Kent Farmsteads Guidance, published by Kent County Council, English Heritage (now Historic England) and the High Weald and Kent Downs AONB partnerships, aims to manage change to historic farms given the functional and material changes that have been occurring to them over recent years.

Farmsteads are a distinct feature of the Tonbridge and Malling rural landscape and a legacy of the area's strong farming traditions. These places are not relics and continue to serve purposes, either still in agriculture or new domestic functions. Whatever their use, steps should be taken to ensure that continued use of these sites preserves and enhances their historic character.


Oasts, Wateringbury © Keith Double


Aylesford © Zoltan Tasi

Theme 6: Industries of the Medway Gap

The River Medway runs south to north through the Borough in a prehistoric chalk valley. The surrounding fertile plain, an area long used for agriculture, became the focus of various thriving industries during the Industrial Revolution, which have shaped the natural landscape, existing settlements and communities in the area. Although many of these industries have now left, their imprint on the region remains.

The increasing use of cement in construction required its production on a large-scale. This fuelled the region's cement industry, which made use of the valley's large resources of chalk and clay. Quarrying was carried out on a large scale in the valley, carving dramatic features into the landscape. The remains of these quarries have in many cases created new lakes in the north of the Borough, in the vicinity of the settlements of Aylesford, Snodland, Eccles and New Hythe.

Paper making arrived in the Borough in the 17th Century and utilised the power of the river to drive milling machinery. The paper industry, focused primarily in Snodland and New Hythe, experienced a boom in the mid-19th century with the introduction of the railway and new manufacturing techniques. The print industry was developed in Tonbridge alongside the area's paper making industry. Brick manufacture and gravel extraction was another booming industry in the Medway Gap and Tonbridge specifically, as the area contained both the clay and sand used in brick making. In fact, Haysden Country Park was formed within the area of an old gravel works to the west of Tonbridge. Many of the bricks produced were used in the building of homes for the new workers these various industries brought in.

The largely agrarian pre-industrial population underwent dramatic changes with the introduction of industry to the area. New settlements were established and existing ones expanded to accommodate the many workers that settled in the region during this period. In particular, settlements such as Snodland, New Hythe and Aylesford were expanded during the 19th and 20th centuries to accommodate the new workers and their families. During this same period, Snodland's population increased nearly seven-fold and many of the terraced homes constructed for these workers still survive. The river became increasingly populated with boats as it was used for the transport of both workers and goods.

Much of the industry has left and aspects of the area's former rural character have returned, including biodiversity associated with the river valley. Remnants of this industry still exist with a paper mill in Snodland. The legacy of industry has helped to shape the character and identity of this unique place and the people who live in it today.


River Medway © John K Thorne

Heritage at Risk

Heritage at Risk are heritage assets that are at risk of being lost (or partially lost) as a result of neglect, decay and inappropriate development. This can be down to total destruction or degradation of the asset itself, but could also be threats to other aspects of significance, such as setting, functionality or group value. Factors that threaten heritage assets can include unsympathetic development, poor heritage management regimes, historic buildings underused or unused, agricultural practices harming below ground archaeological remains and above ground monuments, environmental factors (particularly those associated with climate change: e.g. flooding and subsidence) and lack of understanding of an area's heritage.



The Register

Historic England maintains a Heritage at Risk Register that covers designated heritage assets that have been assessed as being at risk. Designated assets considered for the register include:

- Grade I and II* Listed Buildings;
- Grade I, II* and II places of worship Listed Buildings;
- Registered Parks;
- Conservation Areas;
- Scheduled Monuments;
- Registered Battlefields;
- Protected Wreck Sites.

Four designated heritage assets in Tonbridge and Malling are on the 2022 Heritage at Risk Register. These include:

- Tonbridge medieval town banks (Scheduled Monument)
- Chapel of St Blaise, Offham (Scheduled Monument)
- Church of All Saints, Snodland (Grade I Listed Building)
- Roman villa and Saxon cemetery, Eccles (Scheduled Monument)

The Register does not consider most Grade II Listed Buildings or any non-designated heritage assets, meaning the true number of at risk heritage assets in the Borough is unknown and likely to be significantly greater.

Other heritage at risk

As outlined above, heritage at risk extends beyond the official Register and can include any designated and non-designated heritage assets where their significance is threatened. Identifying such assets can be as simple as members of the public reporting such sites to the council, with risk status verified through aerial survey or a site visit. Local councils sometimes maintain records of the area's heritage at risk, in much the same way that locally listed buildings and other non-designated heritage assets can be registered at the local level (see pg. 9). Such records could identify individual heritage assets or highlight more general areas which are particularly sensitive to harmful change. At risk records are sometimes maintained by other organisations and local groups, such as parish councils, historical societies and neighbourhood groups. Conservation Area Appraisals can also hold information of heritage at risk not covered in historic England's official register.


All Saints Church (Heritage at Risk) © John K Thorne

There is much information on the Borough's non-designated heritage assets which has yet to be recognised and incorporated into decision making. There are two key areas this could be positively addressed:

1. The council does not currently maintain a local list or a local heritage at risk register to keep track of these assets; and
2. 44 of the Borough's 60 Conservation Areas have not had appraisals prepared that lay out their character and pressures affecting them.

There are opportunities to greatly improve the monitoring and management of the Borough's at risk heritage by supplementing this current gap in understanding.

Other heritage at risk continued

Some further instances of heritage being at risk have already been identified, both through ground truthing and review of old Conservation Area appraisals. This does not provide a complete list of the Borough's at risk heritage and should not be treated as such. However, it provides examples of the types of heritage risks in the Borough and how these can be identified through types of survey. Further heritage at risk may be identified through development management, neighbourhood planning and partnership work with other local groups.

The Snodland Conservation Area was identified as being at risk due to unsympathetic development and neglect. The following factors affecting heritage were noted:

- The A228 bypass has truncated the historic town, creating a physical and visual division between the two parts of the Conservation Area. This causes the High Street to end abruptly at the bypass, impacting the setting of nearby Listed Buildings – in particular, the Grade II* Mulberry Cottage located adjacent to the bypass.
- A Grade II mock ruin located south of High Street has been largely engulfed by the surrounding South East Water buildings.
- A non-designated building likely involved in the local paper industry was identified in Holborough Mill Snodland Conservation Area. Windows were boarded over and the building appeared to be in a state of disuse and deterioration. The Conservation Area has not been appraised.
- The Tower Clock on Holborough Road is a non-designated monument to Charles Townsend Hook of the paper industry. Its setting has been almost entirely eroded by adjacent housing and the monument now falls within the front drive of a property.
- The Snodland Conservation Area appraisal was published in May 2001 and requires updating. However, the appraisal lists features which detract from the special character of Conservation Area.

Equally, Tonbridge Conservation Area is at risk, in particular those assets around the central part of the High Street to the north of Tonbridge Castle. This includes sub-character areas A2 and A3 as identified in the Conservation Area Appraisal. The following factors affecting heritage were noted:

- The decline of High Street businesses, a trend observed nationally, has led to several shops standing derelict. This leads to the neglect and deterioration of historic shop fronts, lower footfall in this area of the town, and affects the special character of the Conservation Area. High Street decline was not laid out in the 2009 appraisal which is in need of updating.
- Tonbridge medieval town banks have been visually and physically engulfed by development. This has implications for the wider historic townscape, as the banks play a key role in the historic layout of the town.
- Use of unsympathetic street furniture is often inconsistent with the area's historic character.
- Modern development in the Conservation Area and vicinity can be unsympathetic to the historic townscape and erodes its special character.
- Traditional shop-fronts which characterise the historic High Street have not always been maintained by owners and have sometimes been replaced or altered in ways unsympathetic to historic Tonbridge's character.

Summary and key areas of interest

Tonbridge and Malling is blessed with a rich and varied historic environment which creates a unique sense of place and a legible connection to the area's recent and ancient history. The Heritage Strategy has identified a number of key themes which characterise the unique historic environment, from the ancient prehistoric landscape to the industrial legacy of the Medway Gap. Although much of the Borough's heritage is included in the NHLE, there is also a significant quantity of non-designated heritage assets which are less well documented and understood, despite being equally important to local place-making. As a result, there is also an incomplete understanding of heritage at risk in the Borough. Going forward, it is important that resources and knowledge are brought together to gain a more complete picture of the Borough's heritage and its unique challenges.

The council's commitment to the production of the Heritage Strategy, alongside the development of the Local Plan and suitable policies to recognise, conserve and enhance heritage assets and protect the character and distinctiveness of the Borough, is an important first step in building a robust and supported vision for the Borough's heritage. Once a strong factual base has been achieved, this can act as a lens to focus local level strategic goals to deliver positive change to heritage assets, appreciate the tangible benefits of the historic environment, whilst allowing positive change and growth within Tonbridge and Malling Borough.


Hadlow Tower © Barry Marsh

PART TWO: A POSITIVE STRATEGY

Mulberry Cottage, Snodland © John K Thorne

Heritage as a driver for positive change

The heritage of Tonbridge and Malling is a prime resource in enabling the Council to realise its broader strategic goals and enhance the quality of life within the Borough. Heritage, under the management of a robust plan, can benefit a number of areas, including social cohesion, individual well-being, the natural environment and economic regeneration. This section explores ways in which heritage can benefit the Borough and communities. This is supported by evidence cited in the Heritage Counts (2020) reports by Historic England on behalf of the Historic Environment Forum. These reports set out the various ways in which heritage and the historic environment can benefit other areas of society including social cohesion, economy and the environment.

Heritage as a tool to promote sustainability and the natural environment

Heritage has an important role to play in promoting sustainable development policy, benefiting biodiversity and responding to new pressures brought about by climate change. A recent report from Historic England has found a *'closely interrelated and interwoven'* relationship between the historic and natural environment.[7] Therefore, a planning policy which places heritage front and centre will be significantly better equipped to tackle the council's other environmental and climate change goals – a key goal being for the council to be carbon neutral by 2030.[8]

Historic buildings and built areas have an important role to play in reducing carbon emissions, a key aim of Tonbridge and Malling's Climate Change Strategy 2020-2030. Materials used for construction make up a large portion of the whole-life carbon footprint of buildings. Therefore, planning policy that focuses on protecting and adapting historic buildings for continued use will reduce the need for new development and the district's overall carbon footprint.[9] Furthermore, the historic environment provides significant benefits to biodiversity, providing long established faunal and floral habitats, particularly in historic green spaces which provide mature long-established habitats. Such green spaces are also being recognised for the role they play in the capture and offsetting of carbon emissions.[10]

The historic environment as a catalyst for economic recovery

The council has set out its aims for the Borough's economic development in the Corporate Strategy and the Borough Economic Recovery Strategy. A robust and comprehensive heritage vision for the Borough will in turn benefit the local economy, enabling the council to achieve its economic development goals.

Research conducted by Historic England shows that in 2019 the heritage sector had a direct value of £14.7 billion and directly provides 206 000 jobs. This rises to £36.6 billion and 563 509 jobs when including indirect and induced impacts.[11] Heritage also plays an important role in national tourism, with history and heritage being strong product drivers for both domestic and international tourism to the UK. Studies have also shown both national and local economic benefits from heritage tourism.

The Borough benefits from a wealth of heritage tourist sites, including historic settlements, country houses, archaeological sites / monuments, which provide employment and generate revenue. A strong vision for the Borough's heritage will help the council and heritage sites to capitalise on rebounding tourism, fulfilling a key aim of the economic recovery strategy.[12]

7 Pg. 15, Historic England, Heritage and the Environment 2020
8 TMBC, Climate Change Strategy 2020-2030
9 Historic England, Heritage and the Environment 2020
10 Historic England (White J) 2022, Public Parks and Greenspaces Matter. https://historicengland.org.uk/whats-new/research/back-issues/public-parks-and-greenspaces-matter/ [accessed 16/12/2022]
11 Historic England, 2020, Heritage and the Economy
12 TMBC, Economic Recovery Strategy 2021-2023


Tonbridge High Street © CBA

The historic environment's role in defining local distinctiveness plays a significant role in promoting high street economic vitality, providing a draw to consumers as a key reason to visit local high streets. This in turn attracts new businesses to an area, which have been found to favour business locations in historic places, particularly the creative industries which have been found to benefit from being located amongst heritage assets.[13] This aligns closely with a key aim of the economic recovery plan, which seeks to make the Borough's town centres provide an '*experience*' by making them *'attractive places to visit'*.[14]

Heritage benefits individuals, community groups and society

The historic environment can be harnessed to benefit communities and social cohesion. A survey of people across National Heritage Lottery Fund investment locations found that 80% agree that local heritage makes their area a better place to live.[15] A further survey found that the age of the built environment affects the way people perceive their surroundings, with a perceived higher quality and value attached to older buildings.[16]

The historic environment can benefit communities in a number of ways, which in turn will create positive outcomes for individual members of those communities. It has been found that historic town centres are anchoring points for communal life, supporting social networks and economic exchanges.[17] Furthermore, it has been found that local heritage improves the sense of attachment people have to their locality.[18] A variety of studies have shown that historic parks and gardens also play a key role in the fabric of society, facilitating social mixing in diverse communities, enabling collective activities which construct a sense of communal belonging, and discouraging anti-social behaviour.[19]

Communal heritage projects can engage local people and bring them together, cementing a sense of community and place. Here, heritage could be a conduit for the Borough's aim to embrace effective partnership by engaging '*a wide range of local partners from the private, public, voluntary and community sectors*'.[20] Voluntary heritage posts or community archaeological projects have been shown to support skills and social connection between participants, so could be used by the council to engage communities.[21]

13 Historic England, 2020, Heritage and the Economy
14 TMBC, Economic Recovery Strategy 2021-2023
15 Britain thinks and NLHF 2015. 20 Years in 12 Places: BritainThinks research for Heritage Lottery Fund. www.heritagefund.org.uk/sites/default/files/media/ attachments/20_years_in_12_places_main_report_0.pdf [Accessed June 2018]
16 YouGov, 2018b. Quality of Places Survey Results. historicengland.org.uk/content/docs/research/qualityof-places-pdf/[Accessed July 2020]
17 Izenberg, J. M., Mujahid, M. S., & Yen, I. H. (2018). Health in changing neighborhoods: A study of the relationship between gentrification and self-rated health in the state of California. Health & place, 52, 188.
18 Curtis, S., Congdon, P. and Atkinson, S. and Corcoran, R.,MaGuire, R. and Peasgood, T. (2019) 'Individual and local area factors associated with self-reported wellbeing, perceived social cohesion and sense of attachment to one's community : analysis of the Understanding Society Survey.',Project Report. What Works Centre for Wellbeing.
19 Pg. 22, Historic England 2020, Heritage and Society
20 TMBC, Corporate Strategy 2020-2030
21 CAER Heritage Hidden Hillfort,2017. Unearthening Utopia (reference to Middlefield Dig).

Heritage positively impacts wellbeing and life satisfaction

Engagement with heritage has been found to have a positive impact on wellbeing and improve mental health. Statistics highlight that mental ill health is an increasingly major public health issue in the UK, which the Covid-19 pandemic and related social restrictions exacerbated and further highlighted.[22] Heritage has a role to play in addressing these issues and alleviate pressure on local health and social services.

Research shows that spending time in 'Green and Blue' historic urban places, such as canals, rivers and historic parks, is associated with increased happiness levels and overall life satisfaction.[23] It has also been found that people who live close to historic places and heritage assets self-report better physical and mental health.[24] Tonbridge and Malling is blessed with a wealth of historic places which provide a strong basis for good quality of life within the Borough. A robust strategy which focuses on the protection and promotion of the historic environment could unlock its full wellbeing potential.

Research has demonstrated the important therapeutic role that heritage has to play in improving mental wellbeing. A study on the social prescribing of arts and heritage shows a high return on public investment in such programs – this describes connecting patients with non-medical resources to treat relevant health issues.[25] In turn, this reduces the pressure on other public services and enhances wellbeing amongst individuals within the community. The therapeutic potential of the Borough's heritage could be harnessed to help the Borough achieve its broader efficiency goals as set out in the Corporate Strategy.

Opportunities for positive change

There are numerous ways heritage can improve life for people living within the Borough, many of which align with the council's existing strategic aims and could help these aims to be realised. Below is a list of key opportunities for heritage that could come about from this strategy.

- Recognition of the role that heritage has to play in positive change for the Borough
- Robust recognition of the Borough's heritage in development management process
- Increased public awareness of the Borough's heritage and the role it plays in improving quality of life
- Heritage as a resource for meeting environmental goals as set out in the council's Climate Change Strategy 2020-2030
- Heritage as a resource for meeting the economic and public service goals as set out in the council's Economic Recovery Strategy 2021-2023 and the Corporate Strategy 2020-2023
- Increased cooperation between private and public bodies and partnership working
- Improved management regimes for heritage assets

22 Pg. 32, ref. to IFS 2020, Historic England 2020, Heritage and Society
23 Simetrica, 2018. Assessing the wellbeing impacts of waterways usage in England and Wales.
24 Fujiwara, D. 2013. Museums and Happiness: The value of participating in museums and the arts. The Happy Museum Project publication.
25 Health Education England (2016) Social prescribing at a glance. North West England Report.

Challenges facing the heritage of Tonbridge and Malling Borough

The heritage of Tonbridge and Malling Borough faces a number of challenges, some of which are unique to the Borough and others which apply more broadly across the country. These challenges are outlined below and accompanied by suggested responses which channel opportunities for positive change.

The suggested responses are an exploration of possible answers to the challenges heritage faces – the responses do not carry the same weight as the Strategic Aims (see pg. 29).



Tonbridge High Street © CBA

Challenge 1: There are gaps in understanding of the historic environment of Tonbridge and Malling.
The Borough currently lacks a local list of non-designated heritage assets and heritage at risk. There is also no recognised Borough wide heritage group. Consequently, there is not a full picture of the Borough's heritage and its significance, which hampers informed decision making and management regimes for the historic environment.

Response: Commitment to the Heritage Strategy and implementation of the Strategic Aims will provide a springboard to address gaps in understanding. The strategy emphasises the importance of documenting and monitoring heritage across the Borough, whilst recognising the key aspects of the Borough's heritage which are considered distinct.

Challenge 2: Pressure on local authority resources can make it harder to direct resources towards management of the historic environment.
This is evidenced in the majority of the Borough's Conservation Areas not having appraisals and the limited time allowance for the Conservation and Urban Design Officer

Response: The council can consider options to apply for funding from external bodies to fund additional investment in heritage management regimes. Normalising the use and adoption of existing resources, such as the KHER and the Kent Farmsteads Guidance, can also ease pressure of local authority.

Challenge 3: Climate change has potential to affect the care and management of the historic environment. The Borough's heritage assets are at risk from events linked to climate change such as flooding, extreme heat and drought. This can damage historic landscapes and the fabric of historic buildings, particularly those adjacent to the Borough's water sources.

Response: Continuing to pursue the adopted Climate Change Strategy 2020-2030 will help address the root causes of climate change. Certain heritage management regimes can aid in climate change goals, such as protection of historic green spaces and reuse of historic buildings. Measures such as flood defence and sensitively improving existing buildings can limit extreme weather damage and prolong desirable use of historic buildings.

Challenge 4: The need for further development, particularly housing, could impact on the historic character of the Borough. Development that is unsympathetic to the surrounding environment can harm the setting of heritage assets, the traditional character of settlements and the broader historic landscape.

Response: Understanding the Borough's heritage is an important first step to ensuring development is sympathetic to local heritage. A key route to this would be preparing or updating appraisals for the Borough's Conservation Areas, to clearly define their special character and ensure development accounts for this. The Council could also undertake a high level heritage impact assessment of allocated sites to assess risk and formulate mitigation to limit harm. Review and adoption of the Historic Environment Policy submitted to the Council will provide the basis for a robust development management response. Also, development can go beyond limiting harm to heritage and actually bring benefits, such as through appropriate use of s106 legal agreements to secure funding for heritage regeneration.



Tonbridge Castle © CBA


Aylesford High Street © CBA

Challenge 5: **Historic farmsteads in Tonbridge and Malling are sensitive to loss of significance as a result of their changing use and forms.** Traditional farm buildings have been superseded by modern facilities, changing the form and character of many of these sites. Others have become attractive targets for residential conversion and have largely or entirely lost their agricultural function. Just under half of the Borough's farmsteads have lost the majority of their historic form. As of 2006, 63% of the Borough's Listed farm buildings had been converted to non-agricultural uses.

Response: The Kent Farmsteads Guidance was published to address the challenges facing Kent's historic farms. Promoting use of the guidance in farm building applications would ensure that decision taking is informed. Further, a local list of historic farmsteads could be compiled from existing data available from the KHER and the National Heritage List for England, to monitor the Borough's farmsteads.

Challenge 6: Reductions in funding for local heritage groups prevent them from investing resources into in heritage projects. Competition between different local groups for funding exacerbates pressure on these groups and hinders their ability to fulfil their purpose – describing, promoting and protecting the historic environment.

Response: The council could consider engaging local interest groups, in line with the council's Corporate Strategy 2021-2023, to enable all stakeholders to coordinate their efforts and be more effective in achieving their common goals. Coordination of local groups would allow funding to be effectively allocated to meet local requirements. Public awareness campaigns of the Borough's heritage could also lead to increased funding, donations, volunteering and other forms of active engagement.

Challenge 7: Harmful agricultural processes can lead to loss of some types of heritage asset. Ground disturbance associated with agriculture can truncate or entirely remove archaeological remains. It can also lead to loss of historic landscape features such as earthworks, historic boundaries and woodland.

Response: Local Plan Heritage Policy, being prepared in tandem with the Strategy, should include provisions for archaeological assessment to establish the impact of development, in line with National Policy (NPPF). The council could work to establish dialogue channels with landowners to make them aware of heritage risks. National designation could be used to protect significant sites.

Challenge 8: Heritage can be vulnerable to acts of criminal damage, vandalism or other anti-social behaviour. This challenge is not unique to the Borough and affects heritage across the country. The historic environment is more susceptible to criminal damage when assets fall into disuse, suffer neglect, or are not sufficiently monitored by the local authority.

Response: Criminal damage to the historic environment is within the remit of Kent Police. The council can take a number of preventative measures to decrease the risks and respond to cases of vandalism effectively. This could include increasing public awareness of the historic environment, promoting reuse of historic buildings to discourage neglect, and ensuring protection and conservation of historic townscapes to discourage anti-social behaviour. The maintaining of a local list and local heritage at risk register could help to monitor cases of vandalism and respond quickly. Where the Council identifies criminal damage, the advice of Historic England's heritage crime and policing advisor can be sought.

Strategic Aims and Recommendations

The Heritage Strategy has identified a number of opportunities and challenges facing heritage assets in Tonbridge and Malling. This has informed the Strategic Aims set out below which have been put forward by the Council and agreed with wider stakeholders. These Strategic Aims are high level and have been designed to provide a flexible framework to address the challenges facing the borough's heritage and promote its unique significance whilst complying with the National Planning Policy Framework (NPPF).

Each Aim is supplemented by a series of secondary Recommendations which provide viable routes to achieving the Aims. Each Recommendation is followed by a Rationale to explain and justify the reason for the Recommendation. Each recommendation sets out a series of suggested next steps on how the recommendations could be achieved. Timeframes are described as short, medium and long term meaning within the first year, 2 – 3 years and 3+ years.

It is important to note that because this Heritage Strategy is the first of its kind for the Borough, the Strategic Aims and Recommendations are a starting point on the pathway towards creating and delivering a positive strategy. Therefore, this first Strategy is intended to be high level, positive and crucially realistic in terms of its deliverability. It is intended that this initial Strategy will be revisited, reviewed, updated and built upon to continue to progress the Strategy by furthering the recommendations and developing supplementary aims and recommendations as necessary for conserving and enjoying heritage assets within the Borough.

See below the list of the three high level Strategic Aims. These encompass various goals, such as: gaining a deeper comprehension of Tonbridge and Malling's unique heritage, taking proactive measures to conserve heritage at risk while preserving its significance, and utilising planning policies to appropriately manage the historic environment and development.

Aim 1 – Further develop an understanding and appreciation of Tonbridge and Malling's heritage.

Aim 2 – Develop positive strategies to enable the conservation and enhancement of the significance of Tonbridge and Malling's at-risk heritage.

Aim 3 – Ensure the historic environment is appropriately addressed in Local Plan policy and that this reflects the NPPF and NPPG.

Strategic Aim 1 – Improve understanding and appreciation of Tonbridge and Malling's heritage

Justification - As set out in the Heritage Strategy and NPPF, understanding heritage assets are key to ensuring they are properly addressed in local plan writing and decision making.

Recommendation 1A - Develop a plan to ensure Conservation Areas Appraisals are created and updated.

Rationale - The Borough contains 60 Conservation Areas, 43 of which do not currently have formal appraisals. Working towards preparing appraisals, or other means of supplementing information on these places, their significance and role of contributing towards local distinctiveness and character of a place will enable greater appreciation of the borough's unique heritage and allow for more informed development management.

Next Steps:

- Identify priority Conservation Areas which are under greatest development pressure
- Enquire with Historic England as to potential funding for resourcing or training regarding the production of Appraisals
- Identify appropriate resource and timetable for producing short character statements or appraisals for the priority Conservation Areas
- Produce short character statements for priority Conservation Areas
- Decide whether to roll out character statements for remaining Conservation Areas OR convert short character statements for priority Conservation Areas into full Appraisals

Timeframe - **Short Term**

Recommendation 1B - Develop a plan to identify and recognise non-designated heritage assets for possible inclusion on a local list.

Rationale - The majority of heritage assets in Tonbridge and Malling are undesignated and a local list has yet to be established, but non-designated heritage assets contribute to the uniqueness of the borough's heritage and can be a material consideration during planning. Proposals to identify and recognise these assets will help to further characterise the borough's unique heritage and inform planning policy and decision making.

Next Steps:

- Define criteria for locally listed heritage assets through review of Heritage Strategy themes, discussion with Historic England and review of similar criteria for neighbouring Boroughs and Districts
- Identify appropriate resource and timetable for creation of local list
- Begin drafting local list by using existing sources of information such as Conservation Area Appraisals, Kent Gardens Compendium and other lists held by local civic or historic groups
- Add as a locally listed heritage assets GIS layer to Tonbridge and Malling BC's GIS database which can be reviewed when making planning decisions and updated as needed following planning decisions

Timeframe - **Medium Term**

Strategic Aim 2 – Develop positive strategies to enable the conservation and enhancement of the significance of Tonbridge and Malling's at-risk heritage

Justification - Heritage assets contribute positively to the character and distinctiveness of places where people live, work and play. The NPPF sets out the need for a positive strategy for the conservation of heritage assets most at risk through neglect, decay or other threats.

Recommendation 2A: Address Heritage at Risk which is identified on Historic England's national register.

Rationale - Priority should be given to tackle those assets of highest significance which have been identified by Historic England as being at risk. The latest Heritage at Risk Register contains information on those assets identified within Tonbridge and Malling.

Next Steps:

- Use the latest Heritage at Risk Register including the regional register report and the Heritage at Risk map to identify heritage assets at risk and specifically their register entries, to understand more about the type of asset, condition, ownership type, vulnerability and trend in condition (i.e. improving, stable or declining)
- Ensure these assets are added as a 'National Heritage at Risk' GIS layer on Tonbridge and Malling BC's GIS database to inform local planning and decision making
- Enquire with Historic England and Natural England whether there are any suitable funding available to tackle these assets such as Countryside Stewardship
- Review Council grant funding for ways that can enhance culture and heritage, specifically the nationally identified heritage assets at risk.
- Develop informal partnerships with Historic England, Natural England and other Council departments to identify ways of improving condition and reducing vulnerability
- The Borough Council has also been allocated £445k of capital funding through the Rural England Prosperity Fund and submitted an addendum to the UKSPF Investment Plan to DEFRA in November 2022. With this funding, the Borough Council is looking to work with Sevenoaks District Council and Tunbridge Wells Borough Council to run a grants programme to support rural businesses and communities. One of the interventions in this programme specifically looks at enhancing heritage.

Timeframe - **Short to Medium Term**

Recommendation 2B: Address locally identified heritage assets which are at risk.

Rationale - Following the prioritisation of heritage assets which are on the national register, locally identified heritage assets should be identified and addressed. This could include designated heritage assets outside of the national list's remit (i.e. grade II listed buildings which are not places of worship) and non-designated heritage assets.

Next Steps:

- Identify local heritage assets at risk using existing information such as conservation area appraisals, Kent Garden Compendium list, neighbourhood plans, local knowledge, assets which have been identified in the local plan making process, and assets which have been identified during the development management process
- Use the key themes within the Heritage Strategy to raise awareness of areas that could be susceptible to risk
- Ensure these assets are added as a 'Local Heritage Assets at Risk' GIS layer on Tonbridge and Malling BC's GIS database to inform local planning and decision making
- Review Council grant funding for ways that can enhance culture and heritage, specifically the nationally identified heritage assets at risk. Funding sources could include DEFRA's Rural England Prosperity Fund and the UK Shared Prosperity Fund to find ways of conserving and enhancing heritage assets. The latter targets shop fronts and could be relevant to retail areas within Conservation Areas which are potentially at risk.
- Heritage investigations shall continue to receive priority and shall be carried out in accordance with the timescales set out in the Council's enforcement protocol.

Timeframe - **Medium to Long Term**

Strategic Aim 3 – Ensure the historic environment is appropriately addressed in Local Plan policy and that this reflects the NPPF and NPPG

Justification - The planning system contributes to the achievement of sustainable development. The NPPF sets out planning policies which must be applied to achieve sustainable development whilst ensuring the historic environment is conserved and enhanced.

Recommendation 3A - Ensure Local Plan policy regarding the Historic Environment is reflective of NPPF to enable sustainable development whilst ensuring the conservation and enhancement of heritage assets.

Rationale - The council should develop new policy within the new Local Plan which considers the Historic Environment to ensure that local planning and development management is based on an up to date and informed understanding of the borough's heritage and is compliant with NPPF.

Next Steps:
- Draft NPPF compliant policy which sets out Tonbridge and Malling BC's approach to the Historic Environment in the Local Plan
- Draft a justification which explains the rationale and detail within the policy
- Provisions for archaeological remains should be incorporated into the Local Plan, including requirement for archaeological assessments of impact where appropriate and mitigation strategies
- Review other sections of the Local Plan for a holistic way of incorporating the historic environment into wider topics such as place-making, landscape, design, sustainability, natural environment, character and distinctiveness

Timeframe - **Short Term**

Recommendation 3B - Ensure the historic environment is appropriately addressed in Local Plan site allocations.

Rationale - The site selection process should take account of heritage assets prior to their allocation through identifying, at a high level, risks of harming heritage assets and ways that heritage assets can be conserved and enhanced whilst enabling sustainable development.

Next Steps:
- Identify strategic site allocations
- Undertake heritage appraisals to inform capacity and spatial arrangement of strategic site allocations. These heritage appraisals should identify potential harm to heritage assets, ways that sustainable development could be achieved which minimises the risk of harm and opportunities to conserve and enhance heritage assets
- Consider the need for high level appraisals of smaller potential site allocations where there may be a significant risk of harming heritage assets

Timeframe - **Short to Medium Term**

Final Summary

The Tonbridge and Malling Heritage Strategy has sought to provide a Vision for the borough's historic environment, to serve as an evidence base within the local planning framework. The Vision has been to develop a positive approach to heritage management which delivers tangible social, economic and environmental benefits.

Part One of the Heritage Strategy has provided a picture of the Borough's historic environment. To achieve this, six heritage Themes have been identified which characterise the Borough's unique heritage and contribute to its sense of place. Areas of the historic environment which are less well understood have been indentified and a list of resources put forward to begin to address this gap in understanding. Heritage at risk of loss has also been discussed, with a plan to address this put forward in the Strategic Aims.

Part Two of the Heritage Strategy sets out the benefits that positive management of the historic environment can bring to society, and highlightes areas of alignment with the Council's other strategic goals. The historic environment faces particular challenges in Tonbridge and Malling Borough, which are set out along with possible responses.

The Strategic Aims and Reccomendations serve as guidance for management of the historic environment going forward and provide a starting point for realising the strategy's Vision. These initiatives aim at improve understandin and appreciation of the Borough's heritage, develop positive strategies for conserving and enhancing the historic enevrionement, and ensure the historic environment is appropriately addressed in Local Plan policy in complience with national guidance.

ENDNOTES

MHCLG, 2021, National Planning Policy Framework

Planning (Listed Buildings and Conservation Areas) Act 1990

Ancient Monuments and Archaeological Areas Act 1979

Planning Practice Guidance, Historic environment, 2019

Historic England website, Heritage Definitions, accessed via https://historicengland.org.uk/advice/hpg/hpr-definitions/

Valley of Visions Landscape Partnership Scheme

Britain thinks and NLHF 2015. 20 Years in 12 Places: BritainThinks research for Heritage Lottery Fund. www.heritagefund.org.uk/sites/default/files/media/attachments/20_years_in_12_places_main_report_0.pdf [Accessed June 2018]

YouGov, 2018b. Quality of Places Survey Results. historicengland.org.uk/content/docs/research/qualityof-places-pdf/[Accessed July 2020]

Izenberg, J. M., Mujahid, M. S., & Yen, I. H. (2018). Health in changing neighborhoods: A study of the relationship between gentrification and self-rated health in the state of California. Health & place, 52, 188.

Curtis, S., Congdon, P. and Atkinson, S. and Corcoran, R.,MaGuire, R. and Peasgood, T. (2019) 'Individual and local area factors associated with self-reported wellbeing, perceived social cohesion and sense of attachment to one's community : analysis of the Understanding Society Survey.',Project Report. What Works Centre for Wellbeing.

Historic England 2020, Heritage and Society

TMBC, Corporate Strategy 2020-2030

Historic England, 2020, Heritage and the Economy

TMBC, Economic Recovery Strategy 2021-2023

CAER Heritage Hidden Hillfort,2017. Unearthening Utopia (reference to Middlefield Dig).

Pg. 32, ref. to IFS 2020, Historic England 2020, Heritage and Society

Simetrica, 2018. Assessing the wellbeing impacts of waterways usage in England and Wales.

Fujiwara, D. 2013. Museums and Happiness: The value of participating in museums and the arts. The Happy Museum Project publication.

Health Education England, 2016, Social prescribing at a glance. North West England Report.

Historic England, Heritage and the Environment 2020

TMBC, Climate Change Strategy 2020-2030

Historic England (White J) 2022, Public Parks and Greenspaces Matter. https://historicengland.org.uk/whats-new/research/back-issues/public-parks-and-greenspaces-matter/ [accessed 16/12/2022]



APPENDICES

The Friars Aylesford Priory © John K Thorne

APPENDIX 1: POLICY CONTEXT

National policy

The National Planning Policy Framework (NPPF) sets out the Government's planning policy. One of the key aims of NPPF is to promote development that is sustainable and makes a positive contribution in people's lives. In practice, the aspects of sustainable development include economic, social, and environmental.

As part of its aim to promote sustainability, the NPPF sets out the important role that the historic environment plays in planning policy. Section 16 of the policy document sets out the Government's approach to conserving and enhancing the historic environment. In particular, it specifies that the following should be considered:

- 'the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- the desirability of new development making a positive to local character and distinctiveness; and
- opportunities to draw on the contribution made by the historic environment to the character of a place.'

The NPPF states the importance of having a strong evidence base to inform local plan policies and decision making in relation to the historic environment. This heritage strategy forms a part of that evidence base, describing the district's heritage, identifying key themes and formulating strategic approaches going forward.

Planning Practice Guidance

Planning Practice Guidance (PPG) sets out the importance of having a positive strategy in local plans for the conservation and enjoyment of the historic environment. This should be done through preservation but also enhancement of heritage assets. PPG states:

'In line with the National Planning Policy Framework (paragraph 185), plans should set out a positive strategy for the conservation and enjoyment of the historic environment. In developing their strategy, plan-making bodies should identify specific opportunities within their area for the conservation and enhancement of heritage assets, including their setting. This could include, where appropriate, the delivery of development that will make a positive contribution to, or better reveal the significance of, the heritage asset, or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area.'

PPG lays out the role that policy including non-heritage policy has in the implementation of an area's heritage strategy:

'The delivery of the strategy may require the development of specific policies, for example, in relation to use of buildings and design of new development and infrastructure. Plan-making bodies will need to consider the relationship and impact of other policies on the delivery of the strategy for conservation.'

Local policy

The NPPF requires that local authorities produce their own Local Plans for managing development in their jurisdiction. The Local Plan must deliver the policy goals of the NPPF (see above) to the local area, including those goals concerned with conserving and enhancing the historic environment.

The heritage strategy aims to present the uniqueness and significance of Tonbridge and Malling's heritage and use this to formulate a positive strategy going forward. This document is intended to support the Council in achieving its goals for heritage within the Local Plan and assist with the development of policies to conserve and enhance the significance of heritage assets. It is also intended to ensure that the Council's policies for heritage are evidence based and consistent with NPPF.

APPENDIX 1: POLICY CONTEXT

Existing heritage policy of Tonbridge and Malling LDF is outlined below:

- Tonbridge and Malling Borough Council, Local Development Framework: Core Strategy (25 September 2007) – Policy CP24, Achieving a High Quality Environment.
- Tonbridge and Malling Borough Council, Local Development Framework: Compendium of Saved Policies (April 2010) – Policy PA4/12 Residential Extensions; Policy PA4/13 Shopfront Design.
- Managing Development and the Environment, Development Plan Document (April 2010) – Policy SQ1 Landscape and townscape protection and enhancement; Policy SQ2 Locally Listed Buildings; Policy SQ3 Historic Parks and Gardens.

As the new local plan is adopted by the council, the above policies will be replaced by a new Historic Environment policy that is NPPF compliant and directly informed by the Heritage Strategy.

Neighbourhood plans

Neighbourhood Plans provide local communities with an opportunity to shape planning policy within their areas and have a say on the types of development being delivered. In essence, Neighbourhood Plans are intended to make planning policy and development better reflect the values and concerns of the local people directly impacted by policy, whilst still being in conformity with higher tier plans. It is hoped that this document can help to empower local communities to formulate local plans which can respond to particular local heritage concerns and broader social needs.

Sources of Information

The following sources of data have contributed to the assessment of Tonbridge and Malling's heritage assets:

- National Heritage List for England (NHLE), Historic England, accessed June 2022
- Kent Historic Environment Record (HER), Kent County Council, accessed June 2022
- The Kent Gardens Compendium, Kent Gardens trust and Kent County Council, 1996 and Supplementary Reports 2009/2010
- Kent Farmsteads Guidance, English Heritage, Kent County Council and Kent Downs AONB, 2014
- Valley of Visions Landscape Partnership Scheme, Kent Downs AONB, 2007-2013
- Landscape & Visual Appraisal Report for Tonbridge and Malling Borough Council, March 2019
- Websites for local history societies and civic groups, trusts and heritage organisations
- Conservation Area Appraisals (16), Tonbridge and Malling Borough Council

This has been supplemented by consultation with key officers at TMBC and a site visit carried out in July 2022.

The following strategic documents have also been consulted to inform and deliver the heritage strategy:

- TMBC Climate Change Strategy 2020-2030
- TMBC Corporate Strategy 2020-2023
- TMBC Borough Economic Recovery Strategy 2021-2023

The following legislation, policy and guidance has also been consulted:

- Planning (Listed Buildings and Conservation Areas) Act 1990
- Ancient Monuments and Archaeological Areas Act 1979
- National Planning Policy Framework – MHCLG
- National Planning Practice Guidance – MHCLG
- The Historic Environment in Local Plans, Historic Environment Good practice Advice in Planning: 1 – Historic England

APPENDIX 2: DESIGNATED HERITAGE ASSETS

Heritage Asset type	Quantity in Tonbridge and Malling Borough (as of 2022)
Grade I Listed Buildings	38
Grade II* Listed Buildings	76
Grade II Listed Buildings	1204
Conservation Areas	60
Registered Parks and Gardens	5
Scheduled Monuments	25
Heritage at Risk Register	4

Conservation Areas

Conservation Areas are designated and maintained by the local authority to cover areas of special historic or architectural interest. The designation provides recognition in the planning process of the special character of an area and ensures that preservation or enhancement of this character is a priority in decision making. Sixteen of the Borough's Conservation Areas have published appraisals that detail the aspects of their character which make them significant, many of which were published over 15 years ago. The remaining 44 do not have published appraisals, although some of these have had informal write-ups prepared by local groups – these do not have the same status as an official published appraisal.

The Conservation Areas are spread relatively evenly across the Borough. There is an absence of Conservation Areas in the centre of the Borough in the area of Mereworth Woods, due largely to the absence of developed land and the presence of an operational military training facility. There is also an absence of Conservation Areas in the far north of the Borough above the River Medway. This rural region has been subjected to extensive extraction and comprises small, recently established settlements closely linked to this industry.

Of the 60 Conservation Areas, 46 can be characterised as small rural settlement and include villages, hamlets and farmsteads, accounting for approx. 75% of the Borough's Conservation Areas. Eleven contain manor houses and estates which can be ancillary to a broader settlement included in the designation, such as at Wateringbury Place (Grade II*) in Wateringbury Conservation Area.

Manors can also be standalone Conservation Areas in themselves, such as the National Trust owned Ightham Moat. Mereworth Castle and Oxenhoath and Hamptons are also designated as Grade II* Registered Parks and Gardens (NHL 1000938; NHL 1001355)

Only eight Conservation Areas in Tonbridge and Malling are in larger urban areas, likely reflecting the Borough's predominantly rural character. Five of these are historic settlement cores and include West Malling, Snodland, Tonbridge and Quarry Hill Tonbridge. The other five urban sited CAs cover a range of areas including: undeveloped greenfield land on the edge of settlement (Holborough Mill, Snodland), a 20th Century residential development (Hollywood, Aylesfood) an historic farm (Cobdown Farm, Ditton) and suburban manors and gardens/ parks (Clare Park and Blacklands).

Listed Buildings

There are 1318 statutory Listed Buildings (LBs) in Tonbridge and Malling Borough. The vast majority of these – 1204 (over 90%) – are Grade II listed, the lowest grade of listing. Just 76 (approx. 5%) are Grade II* listed and 38 (approx. 3%) are the highest grade of listing at Grade I.

Most of the Borough's LBs fall within Conservation Areas, with 861 (approx. 65%) located within a Conservation Area. Broken down by grade, this includes 771 (approx. 64%) of Grade II LBs in a Conservation Area, 56 (approx. 74%) of Grade II* LBs in a Conservation Area, and 34 (approx. 89%) of Grade I LBs in a Conservation Area. The Conservation Areas with the greatest number of LBs are West Malling (167) and Tonbridge (88).

The geographic spread of LBs across the Borough is largely even. This is due to the rural character of the Borough which includes numerous hamlets and villages. As such, LBs are not solely confined to the densest urban areas. Several of these hamlets and villages have been designated as Conservation Areas and it is in these that the densest clusters of LBs are found. There is an absence of LBs in the area of Mereworth Woods near the centre of the Borough, reflecting it being a wooded area partially in use by the MOD. There is also a low density of LBs in the area to the north of Tonbridge, the area east of East Malling, and to the north-east of the Medway.

Of the 38 Grade I LBs in TMBC, 13 are churches, 12 are country houses/manors, five are part of an Anglican convent (St Mary's Abbey in West Malling) and two are part of a medieval friary (The Friars Aylesford Priory in Aylesford). Three of the Grade I LBs are medieval ruins – St Leonard's Tower, Old Soar and Tonbridge Castle. The other Grade I LBs include: Dukes Place – a medieval Hospitaller house and later labourers cottages; The Ancient House, and 65 and 67 High Street – a medieval monastic building, later inn / jail, now shops; and Aylesford bridge – a medieval bridge. Some GI LBs in the Borough form key groups with each other. For example, five separate listings cover the buildings of St Mary's Abbey in West Malling, three listings cover the main building and two pavilions of Mereworth Castle, and two listings cover the buildings of The Friars Aylesford Priory.

Of the 38 Grade I LBs in the Borough, all but 4 fall within Conservation Areas. West Malling Conservation Area, covering the town's historic urban core, has the greatest number of Grade I LBs with seven, all of which are medieval era structures. Mereworth CA, covering the house and gardens of Mereworth Castle, has three Grade I LBs all relating to the manor house. The same three Grade I LBs of Mereworth Castle also fall within the Grade II* Registered Park and Garden of Mereworth Castle. However, none of the Borough's other Grade I LBs fall within a Registered Park.

Of the 76 Grade II* LBs in the Borough, the vast majority are late medieval to post-medieval dwellings, particularly hall houses, farmsteads, townhouses and large country houses (manors). Most of these were constructed in the 14th to 18th centuries and have undergone subsequent moderations. There are 12 Grade II* listed churches, 11 of which have medieval origins and one which was built in the 17th century (Plaxtol Church in Plaxtol - NHL1072684).

Of the 76 Grade II* LBs in TMBC, 56 (approx. 74%) fall within Conservation Areas. West Malling Conservation Area, covering West Malling's historic urban core, has the greatest number of Grade II* LBs with 11, including the Parish Church of St Mary the Virgin (NHL1292816), six late medieval to early post-medieval buildings, three 18th century buildings and a 20th century abbey convent church. Aylesford Conservation Area has five Grade II* LBs, including four 16th century buildings and a 20th century Catholic shrine. Only two Grade II* LBs fall within one of the Borough's Registered Parks and Gardens both of which are manor houses within their associated park/garden. This includes Ightham Court (NHL1071968) in Ightham Court Registered Park (NHL1000405) and Oxon Hoath (NHL1363044) in Oxen Hoath Registered Park (NHL1001355).

Of the 1204 Grade II LBs, the majority are post-medieval buildings. The greatest concentrations of Grade II LBs are in the historic centres of West Malling and Tonbridge, however, there is a considerable representation of Grade II LBs in most other parts of the Borough, including the more rural villages and hamlets. There are 771 Grade II LBs which fall within Conservation Areas (approx. 64%). Only 12 Grade II LBs fall within one of the Borough's five Registered Parks, with 8 in Grade II* Oxen Hoath and four in Grade II* Mereworth Castle. These buildings/structures relate to the broader manor grounds which form the designated Parks.

Registered Parks and Gardens

There are five Registered Parks and Gardens in Tonbridge and Malling Borough, including three Grade II Parks and two Grade II* Parks. Grade II Parks include Somerhill, Mabledon and Ightham Court. The Grade II* Parks are Mereworth Castle and Oxen Hoath. These assets are spread across the centre and southern half of the Borough, with none in the northern half in the area of the Medway Gap.

Mereworth Castle (Grade II*, NHL 1000938) is located in the east of the Borough near the village of Mereworth and designates the area of the formal gardens and park of the 18th century manor house (Grade I, NHL 1070675). Oxen Hoath (Grade II*, NHL 1001355) is located approx. 2.5km west of Mereworth Castle, just south of Mereworth Woods, and designates the area of the formal gardens and park of the historic manor house (Grade II*, NHL 1363044).

Ightham Court (Grade II, NHL 1000405) is located in the west of the Borough near the village of Ightham and designates the area of the formal gardens and surrounding woodland of the 16th century manor house (Grade II*, NHL 1071968).

Somerhill (Grade II, NHL 1000381) is located on the southern edge of the Borough immediately east of Tonbridge. Most of the designated area falls outside of the Borough in neighbouring Tunbridge Wells. The designation covers the formal gardens and parkland of Somerhill House, which itself is located outside the Borough.
Mabledon (Grade II, NHL 1001296) is located on the southern edge of the Borough immediately south of Tonbridge. Half of the designated area falls outside of the Borough in neighbouring Tunbridge Wells. The designation covers the formal gardens and parkland of the Mabledon country house, which is located outside the Borough.

Scheduled Monuments

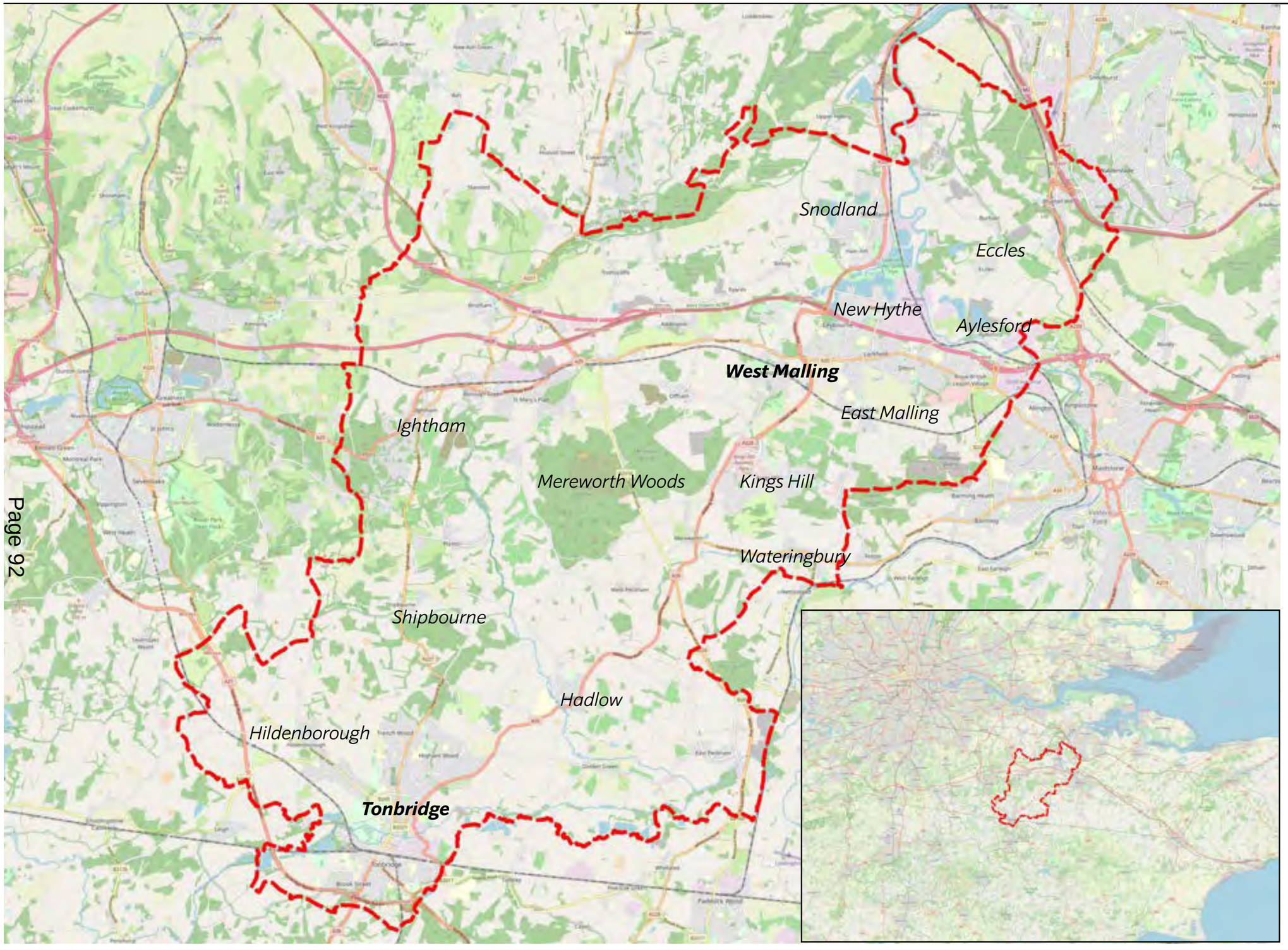
There are 25 Scheduled Monuments in Tonbridge and Malling Borough. The majority of these are spread across the centre and north of the Borough, with significantly fewer located in the south of the Borough. Nine are sites of prehistoric date and include: a hillfort and Palaeolithic rock shelters at Oldbury Hill (1007458), the White Horse Stone (1005181), part of an Iron Age enclosure [and a minor Roman villa] (1003555) as well as five long barrow burial chambers and a bowl barrow.

Three Scheduled Monuments are located in Tonbridge town centre and all relate to the town's medieval origins – they include Tonbridge Castle (NHL 1013359), the defensive town banks (NHL 1003599) and a medieval hall at 186 High Street (NHL 1003603). Other large scale fortified medieval structures include Ightham Mote (NHL 1013120), Leybourne Castle (NHL 1007461) Old Soar Manor (NHL 1014532) and St Leonard's Tower at the south edge of West Malling (NHL 1013382). Religious medieval Scheduled Monuments include St Mary's Abbey, a Benedictine abbey covering an extensive area of West Malling near the town centre (NHL 1008030), the Preceptory at Dukes Place (NHL 1007460) and the chapel of St Blaise (NHL 1005488). Aylesford Bridge (NHL 1005182) is a medieval bridge crossing the Medway River and connecting both parts of Aylesford. Other medieval Scheduled Monuments include and Anglo-Saxon cemetery west of Eccles (NHL 1011770) and a surviving quintain in Offham (NHL 1005188).
Three Roman villas have been scheduled in the north of the Borough in the Medway Gap, with one at East Malling (NHL 1003555), one at Snodland (NHL 1007466) and one at Eccles (NHL 1011770). Roughway Bridge is a Scheduled Monument of 16th century date which passes over the River Bourne. A group structures designated under one Scheduled Monument are SWW military airfield remains located at former RAF West Malling and include a Bofors anti-aircraft gun tower, a Pickett-Hamilton fort and a pillbox (NHL 1020308).



FIGURES

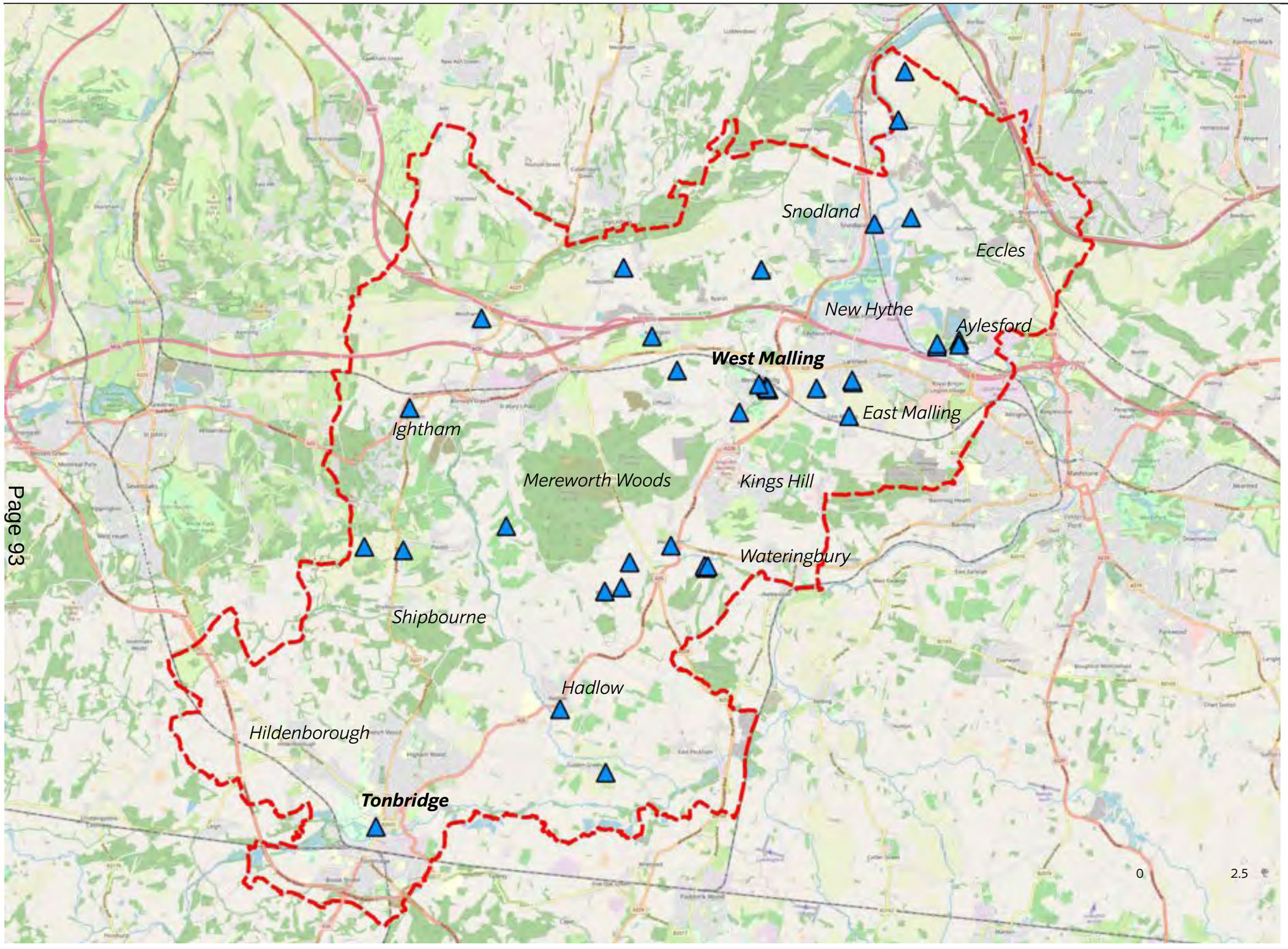
Aylesford Bridge © John K Thorne



Tonbridge and Malling

Map showing Tonbridge and Malling district boundary (red line) and the location of key settlements.

Map data from OpenStreetMap 2022 - available under Open Database Licence [openstreetmap.org/copyright]



Grade I Listed Buildings

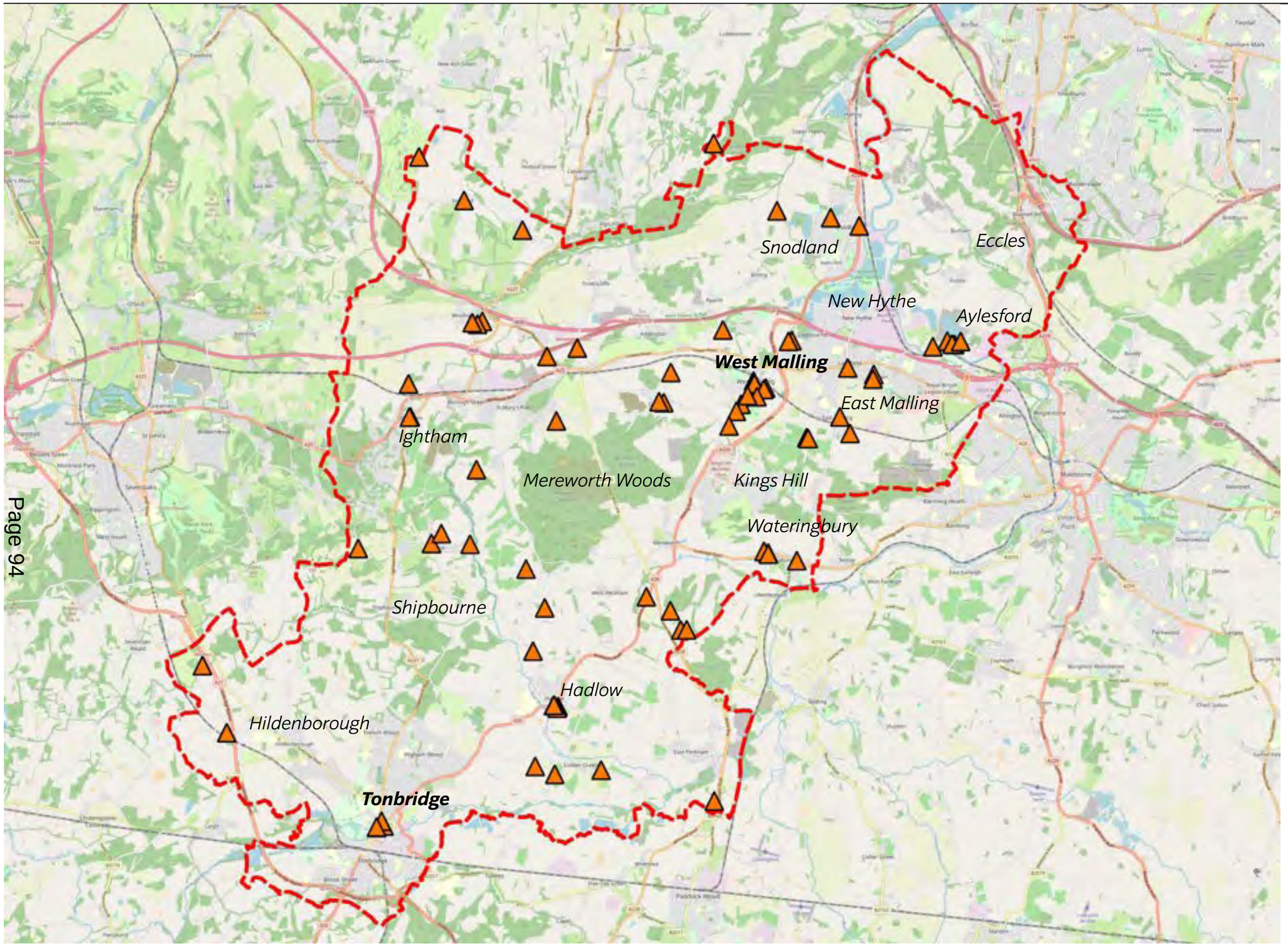
Map showing the locations of the 38 Grade I Listed Buildings in Tonbridge and Malling Borough.

Location data sourced from Historic England National Heritage List for England (NHLE) accurate as of 2022.

N

0 2.5 5km

Map data from OpenStreetMap 2022 - available under Open Database Licence [openstreetmap.org/copyright]



Grade II* Listed Buildings

Map showing the locations of the 76 Grade II* Listed Buildings in Tonbridge and Malling Borough.

Location data sourced from Historic England National Heritage List for England (NHLE) accurate as of 2022.

N

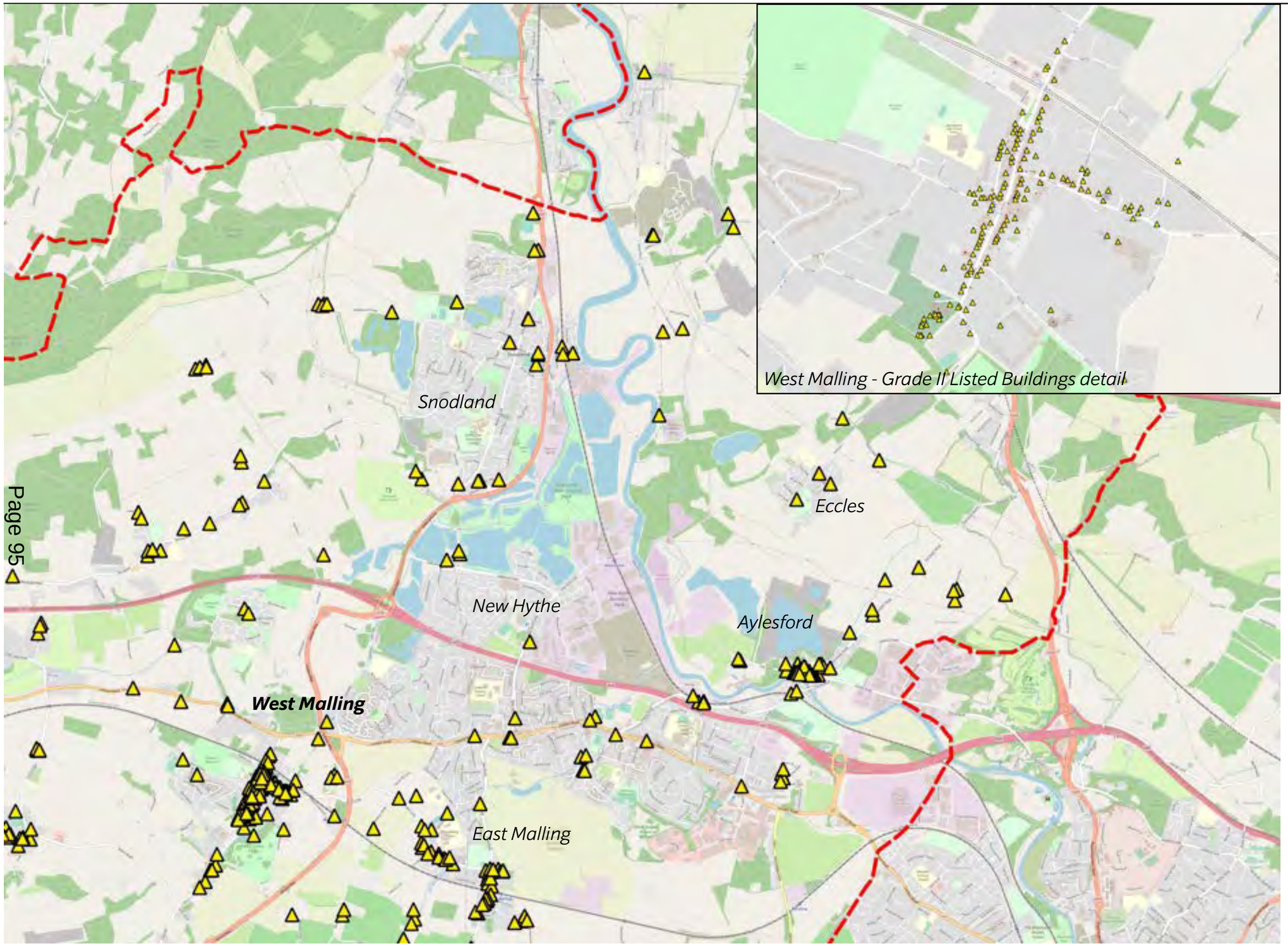
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Map data from OpenStreetMap 2022 - available under Open Database Licence [openstreetmap.org/copyright]

January 2023

HERITAGE STRATEGY
TONBRIDGE &
MALLING BOROUGH
COUNCIL

FIGURE 3
GRADE II*
LISTED BUILDING



Grade II Listed Buildings

Map showing the locations of Grade II Listed Buildings in Tonbridge and Malling Borough - north-east.

Location data sourced from Historic England National Heritage List for England (NHLE) accurate as of 2022.

N

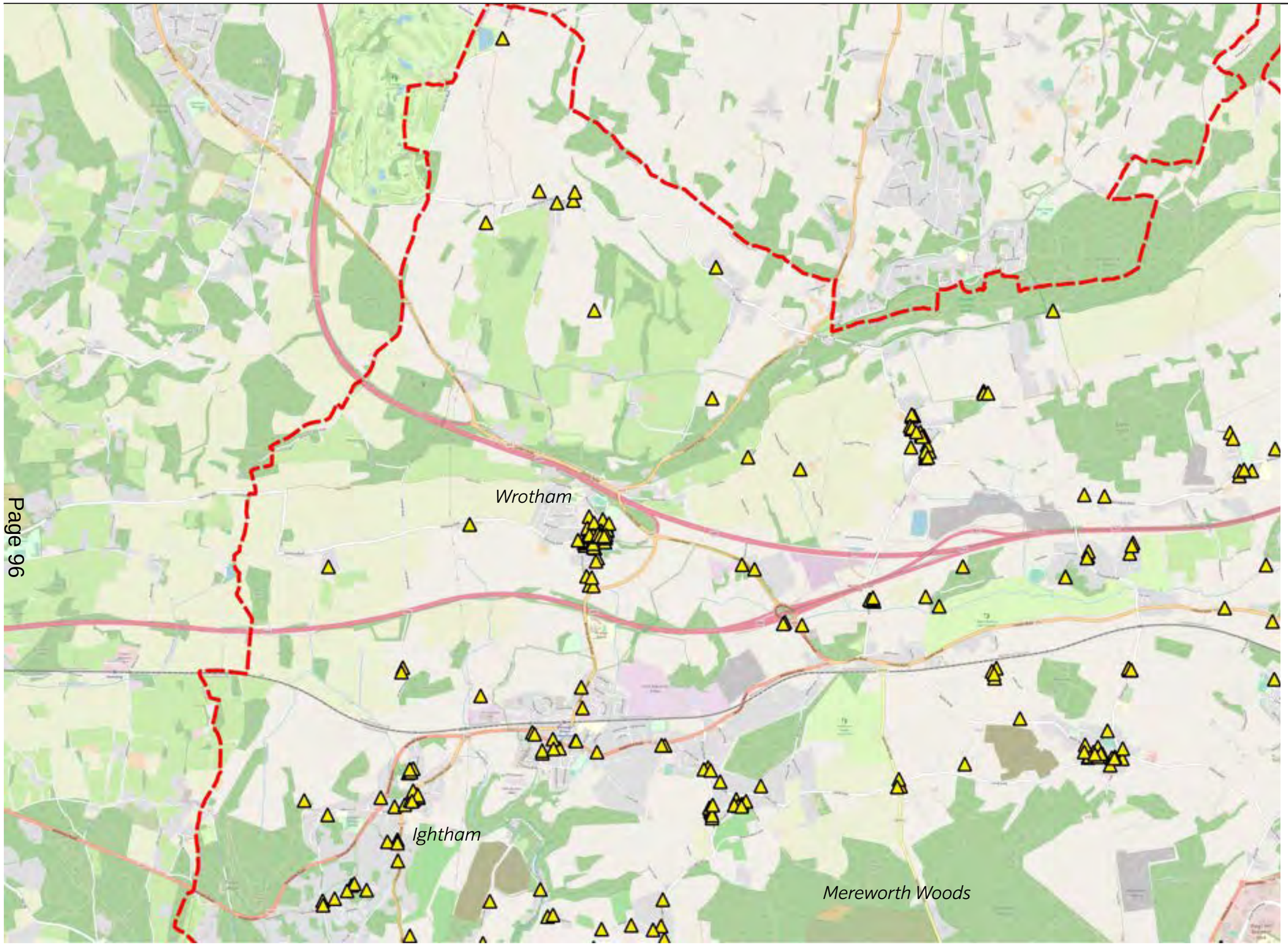
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FIGURE 4
GRADE II
LISTED BUILDINGS



Grade II Listed Buildings

Map showing the locations of Grade II Listed Buildings in Tonbridge and Malling Borough - north-west.

Location data sourced from Historic England National Heritage List for England (NHLE) accurate as of 2022.

N

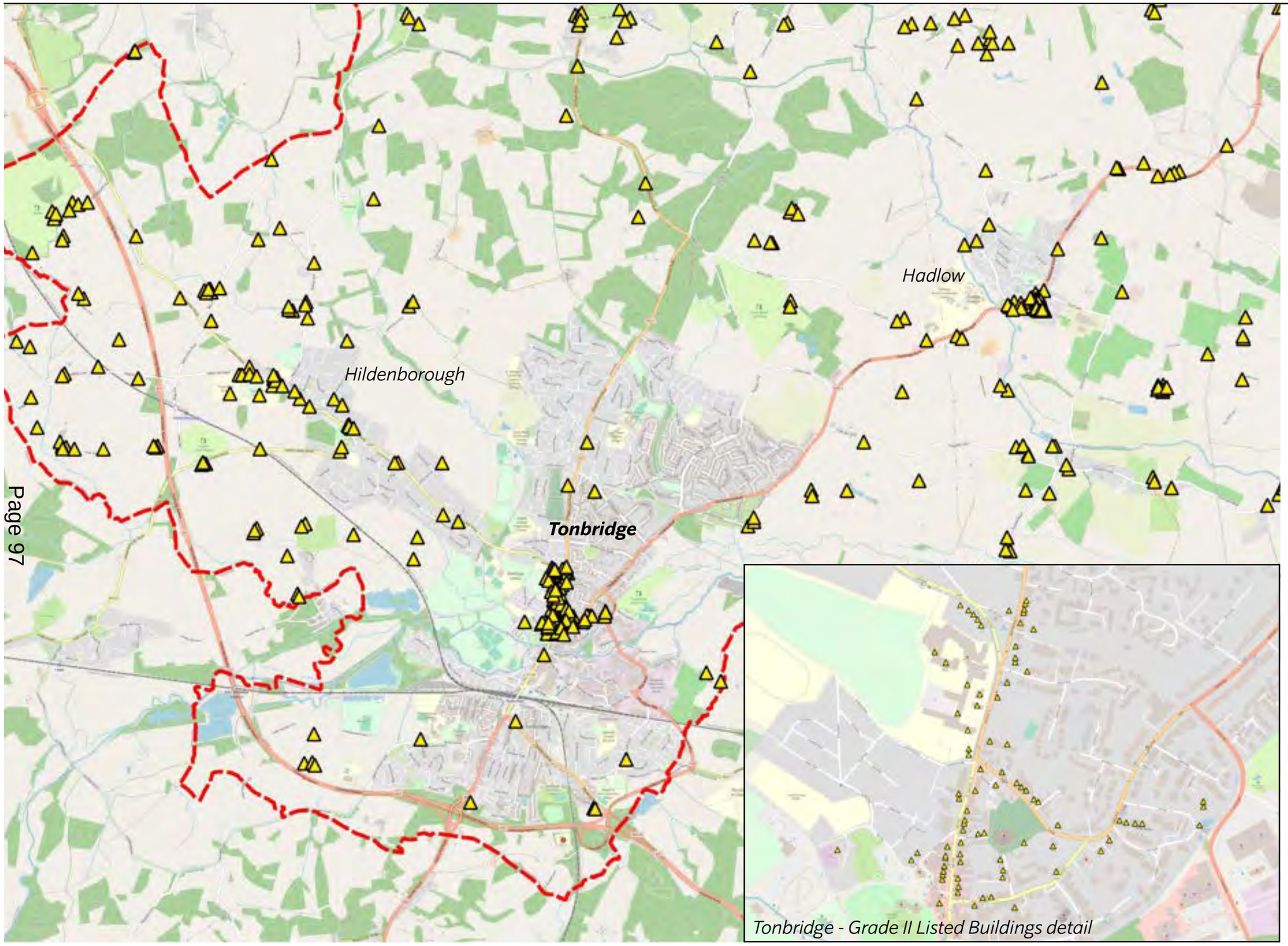
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FIGURE 5
GRADE II
LISTED BUILDINGS



Grade II Listed Buildings

Map showing the locations of Grade II Listed Buildings in Tonbridge and Malling Borough - south-west.

Location data sourced from Historic England National Heritage List for England (NHLE) accurate as of 2022.

N

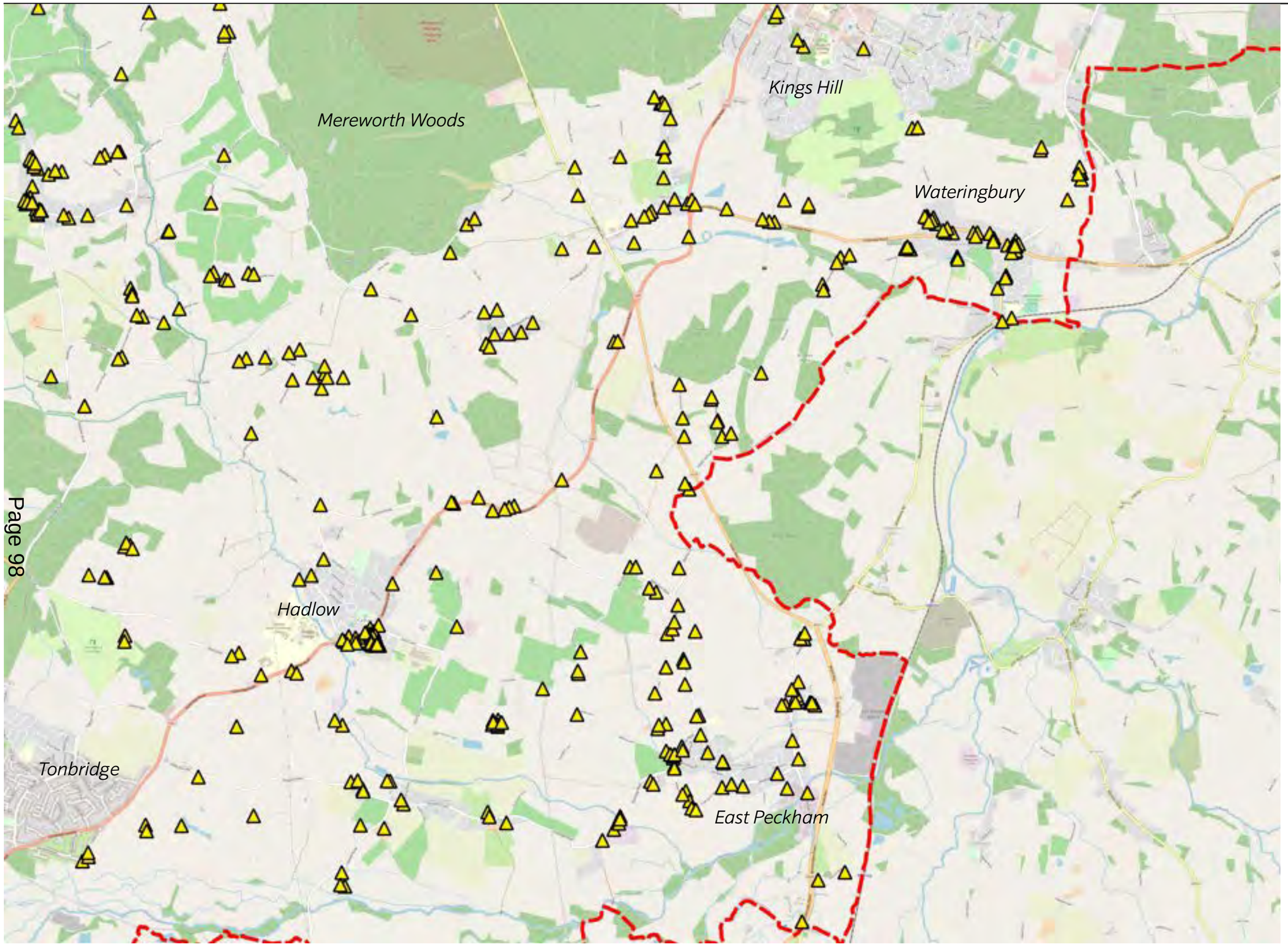
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January 2023

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FIGURE 6
GRADE II
LISTED BUILDINGS



Grade II Listed Buildings

Map showing the locations of Grade II Listed Buildings in Tonbridge and Malling Borough - south-east.

Location data sourced from Historic England National Heritage List for England (NHLE) accurate as of 2022.

N

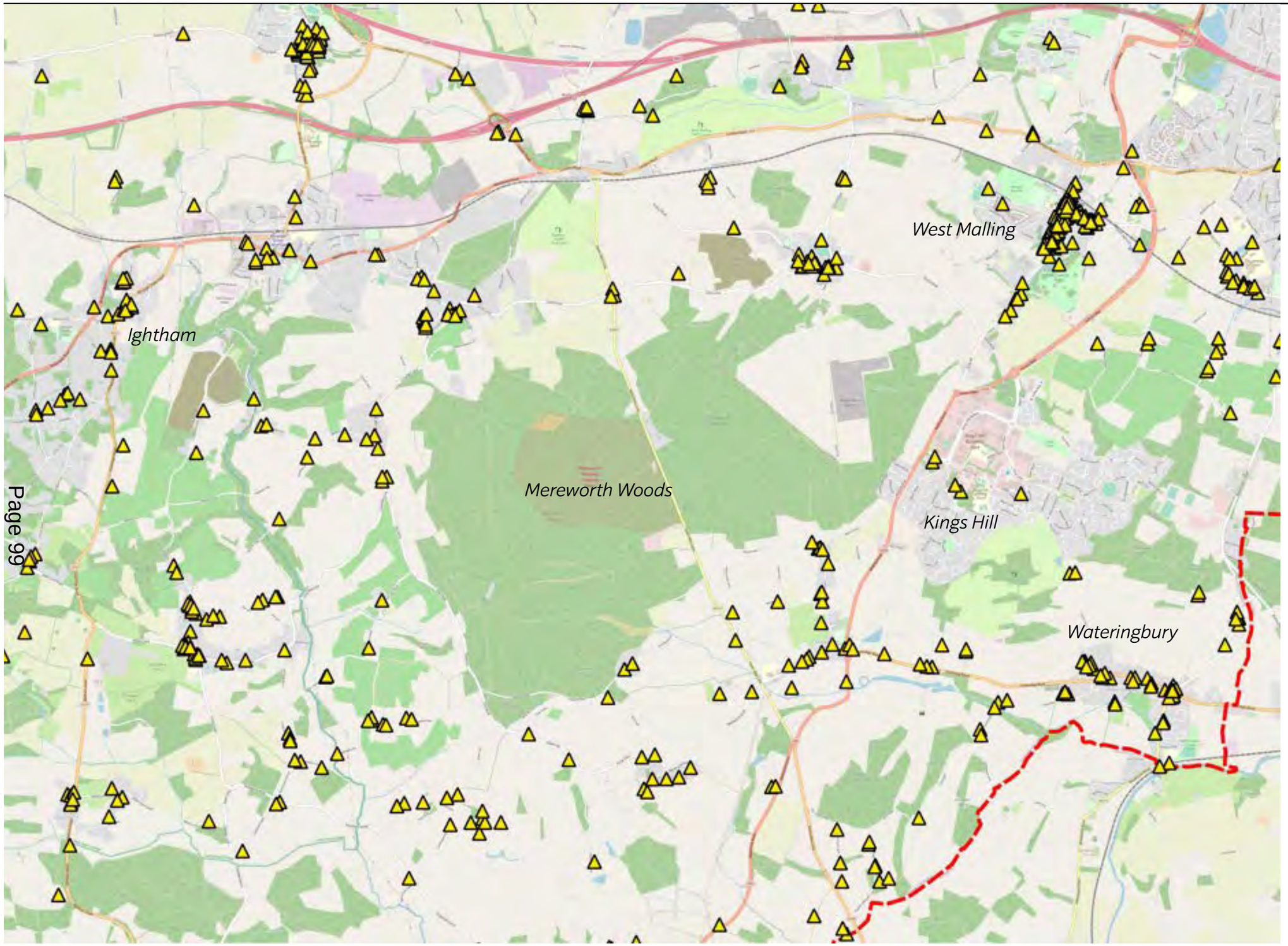
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January 2023

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FIGURE 7
GRADE II
LISTED BUILDINGS



Grade II Listed Buildings

Map showing the locations of Grade II Listed Buildings in Tonbridge and Malling Borough - centre.

Location data sourced from Historic England National Heritage List for England (NHLE) accurate as of 2022.

N

0 1 2km

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FIGURE 8
GRADE II
LISTED BUILDINGS

Conservation Areas

Map showing the locations of 60 Conservation Areas in Tonbridge and Malling Borough (part 1 of 2). Location data sourced from Historic England National Heritage List for England (NHLE) accurate as of June 2022.

1. Stansted
2. Fairseat
3. Butts Hill Wrotham
4. Wrotham
5. Wrotham Water
6. Trottiscliffe
7. Birling Place
8. Paddlesworth Snodland
9. Holborough Mill Snodland
10. Snodland
11. Birling
12. Ryarsh Village
13. Addington
14. Aldon Offham
15. Offham Church
16. Offham
17. Platt
18. Claygate Cross Plaxtol
19. Ightham
20. Oldbury
21. West Malling
22. New Barns And Broadwater Farm
23. Mill Street East Malling
24. Clare Park And Blacklands
25. Bradbourne East Malling
26. Ditton
27. East Malling Village
28. Cobdown Farm Ditton
29. Larkfield Church
30. Aylesford
31. Holtwood Aylesford

0 1.0 2km

Map data from OpenStreetMap 2022 - available under Open Database Licence [openstreetmap.org/copyright]

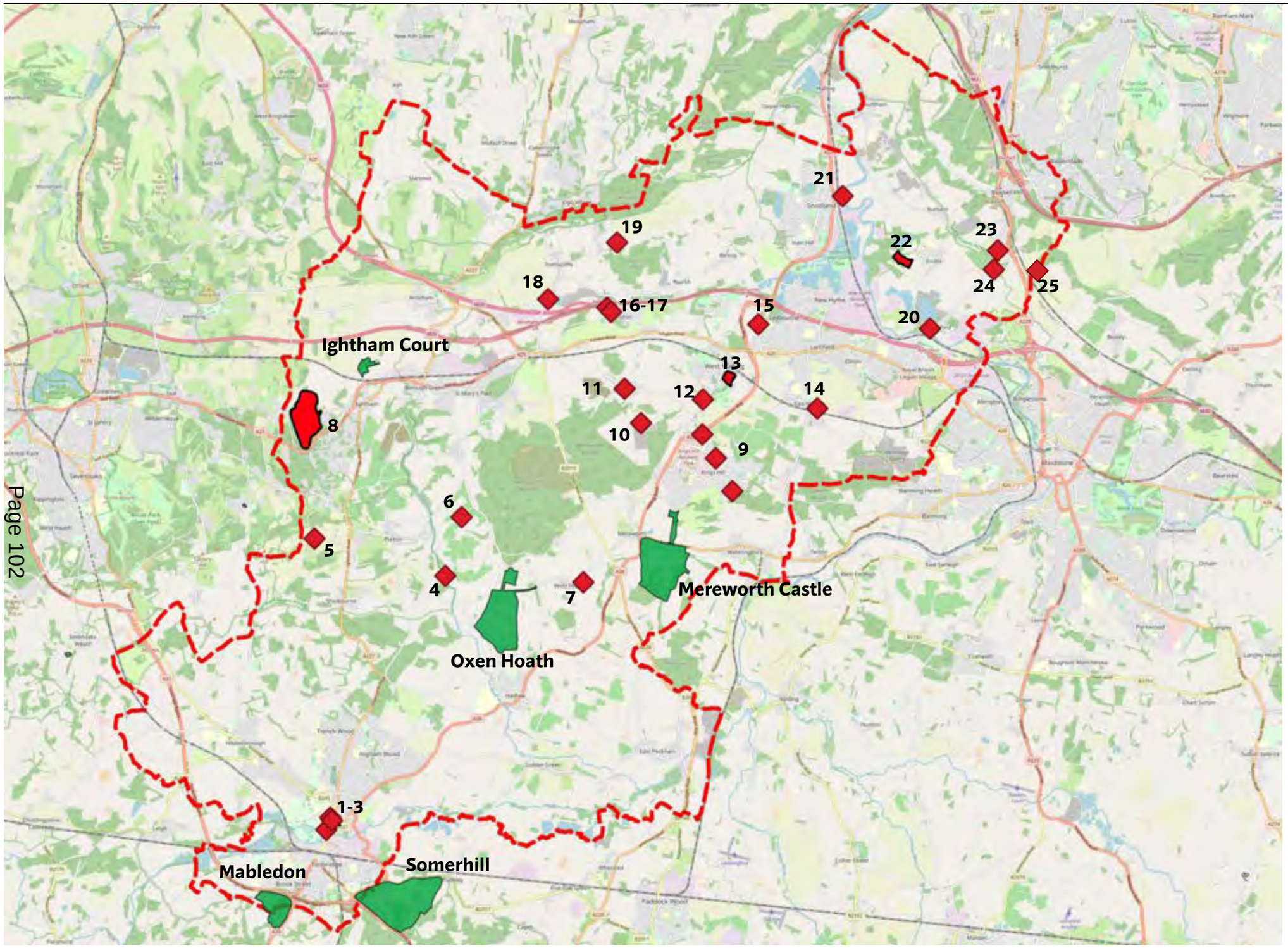
Conservation Areas

Map showing the locations of 60 Conservation Areas in Tonbridge and Malling Borough (part 2 of 2). Location data sourced from Historic England National Heritage List for England (NHLE) accurate as of June 2022.

32. Tonbridge
33. Quarry Hill Tonbridge
34. Haysden
35. Hildenborough
36. Coldharbour Hildenborough
37. North Frith Hadlow
38. Shipborune
39. Fairlawne
40. Plaxtol
41. Budds Green Shipbourne
42. Ightham Mote
43. Ivy Hatch
44. Old Soar And Allens Plaxtol
45. Roughway Plaxtol
46. Oxenhoath And Hamptons
47. The Freehold Hadlow
48. Hadlow
49. Little Mill East Peckham
50. Snoll Hatch East Peckham
51. Bullen Corner East Peckham
52. West Peckham
53. Roydon East Peckham
54. Yotes Court
55. Butchers Lane Mereworth
56. The Street Mereworth
57. Mereworth Castle
58. Pizien Well Wateringbury
59. Wateringbury
60. Wateringbury Station

0 1.0 2km

Map data from OpenStreetMap 2022 - available under Open Database Licence [openstreetmap.org/copyright]



Scheduled Monuments

1. Town Banks
2. Medieval hall at No 186 High Street
3. Tonbridge Castle
4. Roughway Bridge
5. Ightham Mote Medieval moated site
6. Old Soar Manor
7. Preceptory at Dukes Place
8. Large multivallate hillfort and Palaeolithic rock shelters at Oldbury Hill
9. World War II Bofors Anti-aircraft gun tower, Pickett-Hamilton fort and pillbox: part of the airfield defences of RAF West Malling fighter station
10. Chapel of St Blaise
11. The Quintain on the Green
12. Tower keep castle at West Malling
13. St Mary's Abbey: a Benedictine abbey north and east of Water Lane
14. Part of an Iron Age enclosure and a minor Roman villa 128m SSE of the Church of St James
15. Leybourne Castle
16. The Chestnuts Long Barrow
17. Addington Long Barrow
18. Bowl barrow south of Mount Mead
19. Coldrum Megalithic Tomb
20. Aylesford Bridge
21. Roman villa 200m north of church
22. Romano-British villa, Anglo-Saxon cemetery and associated remains
23. Kit's Coty House Long Barrow
24. Little Kit's Coty House Megalithic Tomb.
25. White Horse Stone, Aylesford

Registered Parks

Scheduled Monuments

0 2.5 5km

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January 2023

HERITAGE STRATEGY
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FIGURE 11
SCHEDULED MONUMENT
AND REGISTERED PARKS



Coldrum Long Barrow © John K Thorne

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Annex 3: Draft Settlement Hierarchy – NB Tiers 1-4 are considered to be sustainable settlements

Settlement Category	Description	Settlement name
Principal Service Centre (or an urban area that is directly related to and adjacent to a main urban area located outside the borough)	A key urban area providing a wide range of community infrastructure such as nursery, primary, and secondary schools, a good range of public transport options including train services to London as well as offering a retail and employment function, offering all services and facilities to meet community needs for those living within the urban area and wider.	Tonbridge and Hilden Park, Medway Gap, Walderslade
Service Centre	A sustainable and accessible settlement (by road and public transport) that provides a very high level of community infrastructure including primary schools, shops and health services. Settlement meets the majority of its own needs and also meets the day-to-day services and facilities needs of surrounding smaller settlements.	Borough Green, Snodland, West Malling, Kings Hill
Primary Village	Sustainable locations with a good range of services and facilities, but residents may travel to larger centres to meet wider shopping, leisure and employment needs.	Hildenborough, Hadlow, East Malling, East Peckham, Wateringbury, Wouldham
Secondary Village	Sustainable settlements that have a more limited access to infrastructure and services, but where day-to-day needs can be met. Residents will depend upon other centres to meet a broader range of needs, with accessibility to those centres via road or public transport.	Aylesford Village, Hale Street, Burham, Plaxtol, Snoll Hatch, Wrotham , Eccles , Leybourne Chase, Peter's Village, Platt, Ightham, Birling, Ryarsh, Mereworth & Herne Pound

Other rural settlements	Unsustainable settlements with very few or no services or public transport connectivity and with no/limited access to higher tier settlements in walkable distance, typically in isolated locations.	Stansted, Offham , Shipbourne, Fairseat , Addington, Addington Clearway, Golden Green, West Peckham, Wrotham Heath, Dunks Green, Crouch, Trottiscliffe, Blue Bell Hill

Housing and Planning Scrutiny Select Committee

15 July 2025

Part 1 - Public

Matters for Cabinet - Non-key Decision

Cabinet Member	Councillor Robin Betts, Cabinet Member for Housing, Environment and Economy
Responsible Officer	Eleanor Hoyle, Director of Planning, Housing and Environmental Health
Report Author	Claire Keeling, Housing Solutions Manager

Development of a Homelessness and Rough Sleeping Strategy

1 Summary and Purpose of Report

1.1 The last 5 years has seen unprecedented demand on the Council's Homelessness Service. Covid 19, the resulting Everyone In initiative, the implementation of the Domestic Abuse Act 2021 and a recent and ongoing cost of living crisis have all contributed to this rise in need, with more households finding themselves either homeless or at risk of homelessness.

1.2 Under the Homelessness Act 2002, all Local Authorities must have in place a homelessness strategy based on a full review of all forms of homelessness in the district, which should be reviewed and updated every 4 years. This was further extended in 2018 to include rough sleeping which must be considered as part of the overall strategic objectives.

1.3 The Homeless Code of Guidance, provides further direction and context on developing and publishing a homelessness strategy

Homelessness code of guidance for local authorities - Chapter 2: Homelessness strategies and reviews - Guidance - GOV.UK

1.4 To date we have had actions for the delivery of the Council's homelessness service incorporated within the adopted Housing Strategy, however the ambition is to now review and produce a standalone document, within the context of a UK wide housing crisis as set out above. The review and the subsequent strategy produced will set out how the Council will continue to tackle this increase in demand and will aim to ensure that we prevent homelessness at the earliest opportunity we can, and where we are unable to that we ensure we have a range of housing options available for those who have lost their homes.

1.5 Therefore, the purpose of this report is to inform Members of the ambition to develop a new standalone Homelessness and Rough Sleeping Strategy for the Council and seek endorsement of the approach that will be taken to achieve this.

2 Corporate Strategy Priority Area

2.1 Once produced and agreed the strategy will directly meet the corporate priority of improving housing options for local people whilst protecting our outdoor areas of importance.

2.2 The review will be a comprehensive evidence base, which will set out the challenges faced at a national, regional and local level by the district, and what the key drivers for homelessness are locally. Once developed the evidence base will then inform the draft strategy and key priorities will be identified. A full action plan will also be developed, which will set out clearly the actions we and our partners will take to address the issues raised in the review which will in turn contribute to the achieving the aims of both the strategy and corporate priorities.

3 Recommendations

That Members recommend to Cabinet to:

3.1 **ENDORSE** the approach to the development of a draft Homelessness and Rough Sleeping Strategy for consultation.

3.2 **AGREE** that key stakeholders including Members and key partners will be engaged to assist and inform the development of the draft strategy.

3.3 **AGREE** the proposed timetable which aims to present a draft strategy to Housing and Planning Scrutiny Select Committee on 02 December 2025 with a final draft following consultation to be presented to Cabinet on 03 March 2026.

4 Introduction and Background

4.1 Not having a home can impact in all areas of a person's life. It can affect mental and physical health and wellbeing, children's development, and places households under immense pressure.

4.2 The Councils ambition is to tackle and address homelessness across the district of Tonbridge and Malling and ensure that we continually improve housing options for local people and further build on already numerous successes within the homelessness service.

4.3 To achieve this the Council will:

- Complete a comprehensive desktop review of national, local and regional strategies, policies and procedures which will impact on the service.

- Complete a full analysis of the data held at a national, regional and local level to understand where the challenges are for the council.

- Undertake a full analysis of the issues, challenges and barriers to accessing the homelessness service, to draw out the key issues faced by residents of the district when accessing the service.

- Fully engage key stakeholders including members and key partners to assist and inform the development of the draft strategy.

- Produce an evidence base, draft strategy and associated action plan, which sets out the key priorities for the Council and how it will deliver against these.

4.4 Once this work has been completed the draft strategy will then be presented back to Members for agreement and once agreed, will then go forward for public consultation. Once consultation has concluded, then the amended strategy will be brought back to Members ahead of launch and implementation.

5 Proposal

5.1 A draft strategy will be developed by officers following this initial discussion with Members.

5.2 Although formal consultation will take place at a later stage (see section 10 of this report), there will also be initial discussions with key stakeholders including MHCLG, our largest Registered Providers and third sector partners to share initial thoughts and ideas.

5.3 A draft strategy will then be presented to Members, requesting approval for a period of consultation to be undertaken before formal adoption.

6 Other Options

6.1 No other options were considered as it is a legal requirement to carry out a review of homelessness in the district and to have in place a Homelessness and Rough Sleeping Strategy. To take a “do nothing” approach would place the Council at risk of challenge and a breach of statutory requirements for not developing this document.

7 Financial and Value for Money Considerations

7.1 In a climate where the cost of homelessness services is rising, failure to effectively review, forecast demand and plan homelessness services or meet statutory requirements through the production of a strategy may lead to reputational damage, late approaches to the service which limits our opportunities to prevent the loss of homes, and potential rises in the numbers in temporary accommodation.

7.2 Any action plan would contain cost implications but the majority of these would likely be met by using existing resources and grants.

7.3 The Director of Planning, Housing and Environmental Health confirms that the proposals contained in the recommendation(s), if approved, will fall within the Council's Budget and Policy Framework.

8 Risk Assessment

8.1 Not having a Homelessness and Rough Sleeping strategy places the council at risk of legal challenge as a strategy is a statutory requirement.

9 Legal Implications

9.1 The Homelessness Act 2002 requires local Authorities to review homelessness in their district and formulate and publish a strategy based on the results. Whilst the Council considered previously that it had met this requirement through having a specific homelessness section and action plan within our main Housing Strategy, having reviewed the legislative requirements it is considered that this approach may not meet them and therefore a standalone strategy is now being prepared.

10 Consultation and Communications

10.1 A range of key partners and stakeholders will be consulted once the draft Homelessness and Rough Sleeping Strategy is produced and agreed by Members. It is intended to present Members with a draft strategy at the meeting of the Housing & Planning Scrutiny Select Committee on 02 December 2025. A period of consultation is then proposed for December 2025/January 2026.

11 Implementation

11.1 The aim is to have a final draft strategy presented to Cabinet on 03 March 2026.

12 Cross Cutting Issues

12.1 Climate Change and Biodiversity

12.1.1 Limited or low impact on emissions and environment.

12.1.2 Climate change advice has not been sought in the preparation of the options and recommendations in this report.

12.2 Equalities and Diversity

12.2.1 Members are reminded of the requirement, under the Public Sector Equality Duty (section 149 of the Equality Act 2010) to have due regard to (i) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010, (ii) advance equality of opportunity between people from different groups, and (iii) foster good relations between people from different

groups. The decisions recommended through this paper directly impact on end users. The impact has not yet been analysed, but a full impact assessment will be completed whilst developing the evidence base, and will be concluded after consultation has taken place, and will be presented alongside the Strategy.

Background Papers	Housing Act 1996 Part VII Homelessness Act 2002 Equalities Act 2010 The Homelessness (Suitability of Accommodation) (England) Order 2012 Homelessness Reduction Act 2017 Domestic Abuse Act 2021 Homelessness Code of Guidance
Annexes	

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Housing and Planning Scrutiny Select Committee

15 July 2025

Part 1 - Public

Matters for Cabinet - Non-key Decision

Cabinet Member	Cllr Mike Taylor, Cabinet Member for Planning and Cllr Des Keers, Cabinet Member for Community Services
Responsible Officer	Eleanor Hoyle, Director of Planning, Housing & Environmental Health
Report Author	Eleanor Hoyle

Sports Facilities Evidence

1 Summary and Purpose of Report

1.1 To outline the Council's emerging approach to maintaining and enhancing sports facilities in the borough through the adoption of the Indoor Sports Facilities Strategy and the Playing Pitches and Outdoor Sports Facilities Strategy.

2 Corporate Strategy Priority Area

2.1 Efficient services for all our residents, maintaining an effective council.

2.2 This priority includes a commitment to 'promote well-being and help people, especially our most vulnerable residents, to live healthy and active lifestyles. This includes facilitating good quality leisure facilities and services across Tonbridge and Malling'. This report provides a strategic framework against which to take relevant actions and to judge proposals for sports facilities.

3 Recommendations

3.1 ENDORSE the reports and RECOMMEND to Cabinet that they approve the adoption of these as the Council's current policy position on sports facilities

3.2 DELEGATE authority to the Director of Planning, Housing & Environmental Health, in consultation with the Cabinet Members for Planning and Community Services, to publish Stage E reviews of these reports to update the position to help inform the Local Plan and other Council workstreams.

4 Introduction and Background

4.1 The Local Plan process requires an evidence base led approach to ensuring the delivery of sustainable development to support existing and new communities. Access to and opportunities for sport and physical activity is important for the health and well-being of communities and there is a national policy requirement for planning policies to be based on robust and up-to-date assessments of the need for sport and recreation facilities.

4.2 Both the Indoor Sports and Playing Pitch strategy reports were progressed in 2024. The future needs assessment is therefore based on the Council's housing need at that time of 839 dwellings per annum to understand future deficits in provision. The new NPPF published in December 2025 provides a housing need figure of 1090 per annum, an increase of 251 dwellings per year. Given the increase, this therefore requires further testing to understand whether and what additional facilities, to that which have been identified in the report already, should be sought to support future development. Further work is therefore required to provide a more up-to-date position.

4.3 Sport England Guidance for progressing indoor sports strategies and playing pitch strategies provides a five-stage approach to assessments. Stages A - D have been undertaken as presented in the reports. There is a further stage, stage E, and this provides an opportunity for monitoring and review of the assessments undertaken. In discussions with Sports England and our consultants, we will utilise this part of the Sport England methodology to update and review the work undertaken to date and this review will be undertaken alongside the development of the local plan at an appropriate time to align with plan-making to ensure that evidence is as up to date as possible. Ahead of this and for now, the report provides a strong basis for supporting policy making and decision making given that any updated report is likely to require more, not less, facilities to absorb the demand from an increase in population, over and above that set out in the report. A Stage E report will therefore further justify the protection, enhancement and requirement for new provision of facilities, given that a population increase will increase demand.

4.4 In addition to the need to progress a Stage E review to account for increased housing need, stage E provides an opportunity to understand supply and demand changes in sports provision. There are a number of sports related developments under consideration in the borough at present that have an impact on the timing of bringing this report to Members at this time and ahead of the Stage E review;

4.4.1 The Council has made a decision to replace the existing Angel Centre in Tonbridge Town Centre, which is referenced in the Indoor Sports Facilities Strategy. This report indicates that these facilities are required to maintain current levels of accessibility to facilities.

4.4.2 The K Sports site has recently changed ownership and is subject to a planning application process at present. The site has previously been utilised by several amateur sports clubs, some based in the borough and others in neighbouring areas. Understanding any potential need for community/amateur facility access is therefore important to sports provision in the north of the borough.

4.4.3 The Council owns the freehold of the Tonbridge Farm site, which houses several sporting uses, including an all-weather pitch, football pitches and the Tonbridge Angels stadium. Discussions are underway about the renewal of facilities at this site and the Council wishes to work in partnership with the Club as the leaseholder of the Longmead Stadium to ensure that a sustainable and deliverable set of proposals come forward for the site.

5 Proposal

5.1 It is proposed that these strategies are adopted by the Council as its current policy position on Sports Facilities. This will maximise the Council's ability to support and develop key facilities across the borough, particularly where there are significant potential changes to facilities already proposed and in some case in the Council's ownership.

5.2 These strategies will be able to inform the negotiation of s106 agreements where development would impact on facility use and may drive a requirement for a contribution towards enhancement or replacement.

5.3 Given that the Council will need to progress a Stage E review of these reports shortly to support the local plan process, it is proposed that the ability to publish the Stage E report to the relevant area of the Council's website, in order to ensure that up to date considerations are in use for any discussions where these reports are being used as evidence to support the Council's position, is delegated to the Director of Planning, Housing & Environmental Health, in consultation with the Cabinet Members for Planning and Community Services. This will ensure that timely updates, where they are considered to fall within the more general delegations to the Director and Cabinet Members for amendments to adopted policies, can be carried out. However, these reports will still form part of the evidence base presented to Members for Regulation 18 and 19 stages of the Local Plan.

6 Other Options

6.1 The Council could choose to wait until the Regulation 18 consultation takes place to have these strategies form part of its policy / evidence framework. However, this would mean that any development that is approved in the intervening time period would be a missed opportunity to potentially secure contributions towards facilities or to ensure that any developments or lettings take into account identified needs.

7 Financial and Value for Money Considerations

7.1 In any planning application process, viability considerations would play a role in the securing of contributions. The Sports England Facilities Calculator would be utilised as a starting point for such considerations.

8 Risk Assessment

8.1 There is a risk that the Council misses opportunities to secure contributions for sports facilities whilst the Local Plan is being prepared if there is not an established position against which to measure any impacts from development.

8.2 Whilst the above relates specifically to planning processes, there may also be missed opportunities for the Council to take on a community leadership role in advocating for particular grassroots sports opportunities.

9 Legal Implications

9.1 There are no specific Legal implications arising from these proposals that are not already identified and managed through either Local Plan or Development Management processes.

10 Consultation and Communications

10.1 The updated strategies will be published as part of the Local Plan Regulation 18 consultation in Autumn 2025.

11 Implementation

11.1 If approved, the strategies will be published on the Council's website. There will also be a staff briefing for relevant staff in Planning and Legal to ensure that these provisions are embedded into relevant working practices.

12 Cross Cutting Issues

12.1 Climate Change and Biodiversity

12.1.1 Adaptation and resilience have not been considered at this strategy development stage. Any development or extension of facilities would be required via their planning application process to consider these matters.

12.1.2 Climate change advice has not been sought in the preparation of the options and recommendations in this report.

12.2 Equalities and Diversity

12.2.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users due to the fact that all facilities would be expected to take into account

accessibility and other equalities requirements during their development processes.

12.3 Other If Relevant

- Healthy Lifestyles

12.3.1 The protection, development and enhancement of sporting facilities contributes to the aim of ensuring that residents can have healthy lifestyles.

Background Papers	None
Annexes	Indoor Sports Facilities Strategy Playing Pitch and Outdoor Sports Facilities Strategy

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Ploszajski Lynch Consulting Ltd

Tonbridge and Malling Borough Council

Indoor Sports Facilities Strategy

May 2025

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1 INTRODUCTION

1.1 Introduction

Tonbridge and Malling Borough Council (TMBC) appointed Ploszajski Lynch Consulting Ltd. (PLC) to produce Sports Facilities, Playing Pitch and Open Spaces Strategies for the borough. The strategy covers:

- Indoor sports and active recreation facilities.
- Playing pitches and outdoor sports facilities.
- Informal/casual outdoor active recreational opportunities.

This document comprises the assessment of indoor sports and active recreation facilities needs.

1.2 The rationale for the strategy

1.2.1 Purpose

TMBC is currently in the process of preparing a new Local Plan, which will have a time horizon of 2042. To inform the Local Plan, complement existing evidence and to help address the expectations of national legislation and policy, the council has commissioned the preparation of a combined Open Space, Indoor and Outdoor Sport and Recreation Strategy. The purpose of this work is to provide the open space, playspace and recreation evidence to support the council's emerging Local Plan, as well as provide corporate direction on the future role of its assets and leisure provision. This should be considered in the context of anticipated future growth in the borough.

1.2.2 Objectives

The objectives of all three studies are as follows:

- To identify opportunities for enhancing and facilitating healthy lifestyles through multi-functionality of space, the built environment, the role, design and location of future open space, playspace and recreation provision.
- To identify any specific locational requirements for each typology, aligned to the council's emerging Local Plan and identify any strategic site opportunities.
- To review adopted local planning policy requirements, as included in the council's Managing Development and the Environment DPD.
- To make appropriate planning policy recommendations to reflect any updated open space, sport and recreation provision standards, to inform the Local Plan and assist the council in securing development outcomes.

- To undertake engagement with stakeholders including council officers, facility operators, Kent Sport, Fields in Trust and Sport England as appropriate throughout the preparation of the strategy.

- To undertake an audit of existing indoor and outdoor facilities provided by public, private, voluntary and education sectors.

- To identify within Tonbridge and the rest of the borough quantitative and qualitative deficits and surpluses, having regard to the accessibility and availability of individual facilities.

- To assess the need for existing and future facilities (both indoor and outdoor).

- To review current facility usage.

- To make recommendations to support the most efficient use and operation of TMBC sports facilities in response to user demand and ongoing budgetary pressures.

1.3 The scope of the strategy

The indoor sports facilities included in the Strategy are:

- Multi-use sports halls (including consideration of specific requirements for gymnastics).

- Competition and leisure swimming pools including diving facilities.

- Health and fitness facilities.

- Squash courts.

- Indoor tennis facilities.

- Indoor bowls facilities.

1.4 The strategy methodology

The methodology for the strategy followed the *'Assessing Needs and Opportunities Guidance'* (2014) approach (ANOG), developed by Sport England. The process involved two parts and three stages as follows:

- **Part One -** Undertaking the assessment.
  - ***Stage A:*** Prepare and tailor the assessment.
  - ***Stage B:*** Gather information on supply and demand.
  - ***Stage B:*** Bring the information together.
- **Part Two - *Stage C:*** Applying the assessment.

1.5 Strategy format

This document comprises the strategy and is structured as follows:

- Assessing sports facilities needs in Tonbridge and Malling.
- The local context for facilities provision.
- Strategic influences on facilities provision.
- Sports halls.
- Swimming pools.
- Health and fitness facilities.
- Squash courts.
- Indoor tennis facilities.
- Indoor bowls facilities.
- Gymnastics facilities.
- Policies and recommendations.
- Implementing and reviewing the strategy.

2 ASSESSING SPORTS FACILITIES NEEDS IN TONBRIDGE AND MALLING

2.1 Introduction

This section explains the basis upon which the current sports facilities needs in Tonbridge and Malling have been identified, along with the approach for identifying the additional provision that will be needed as a result of population growth.

The methodology applied to assess the needs and opportunities for sports facilities follows Sport England's recommended approach, advocated in *'Assessing Needs and Opportunities Guidance'* (2014). It also takes account of Sport England's *'Strategic Outcomes Planning Guidance'* (2020).

2.2 Preparing and tailoring the approach

TMBC convened a project steering group led by officers from leisure, planning policy and administrative and property services and involving advice from Sport England and the relevant governing bodies of sport to devise:

- The vision and objectives of the review of sports facilities in the borough.
- The scope of the exercise, including the types of facilities to include, the geographical scope and the overall timeframe for the assessment.
- The local and wider strategic context.
- The project management arrangements for the strategy.

A project brief was produced, approved and signed-off to complete Stage A of the process.

2.3 Assessing sports facilities supply

The assessment of sports facilities supply at Stage B of the strategy involved four main elements:

- ***Quantity:*** Establishing what facilities there are in the borough, with details of their dimensions, technical information like playing surfaces and floodlighting. This included consideration of facilities not currently in use, those not available to the community and significant provision in neighbouring areas that serves some needs of Tonbridge and Malling residents and visitors.
- ***Quality:*** Auditing the quality of facilities. This involved assessing each facility in terms of its condition (its age, appeal, fabric and ancillary provision like changing and car parking - factors that will influence its attractiveness to users) and fitness for purpose (its technical specifications and ability to accommodate an appropriate standard of play).
- ***Accessibility:*** Determining spatial distribution of provision in the borough by GIS mapping of each facility type, including catchment analysis appropriate to the scale and role of each facility.

- ***Availability:*** Identifying how much each facility is used, whether there is any existing spare capacity and if there is any scope to increase capacity. This involved consideration of programming and usage data, opening times and pricing levels, which was secured through consultation with facility providers and operators.

The information was collated and analysed in a facilities supply report, which was evaluated and approved by the project steering group.

2.4 Assessing sports facilities demand

The assessment of sports facilities demand at Stage B of the strategy involved five main elements:

- ***Local population profile:*** Establishing the local demography, including the size, age profile, affluence/deprivation, health indices and growth projections.

- ***Sports participation:*** Identifying local sports participation characteristics, through analysing the results of Sport England's *'Active Lives'* survey, local facilities usage figures and a survey of local clubs to establish membership patterns and trends.

- ***Unmet, displaced and future demand:*** In addition to current expressed demand, an analysis of unmet (demand which exists but cannot currently be satisfied), displaced (demand from within the borough that is satisfied elsewhere) and future demand (based on projected population and participation increases) was undertaken.

- ***Sport England's Facilities Planning Model:*** TMBC also commissioned an assessment using the Sport England Facilities Planning Model (FPM) spatial modelling tool. The FPM study is a quantitative, accessibility and spatial assessment of the supply, demand and access to sports halls and swimming pools in the borough. It included three modelling 'runs'

  - A baseline assessment of provision in 2023.

  - A forward assessment of demand for sports halls and swimming pools and their distribution, based on the projected changes in population including residential development between 2023 and 2041.

  - An assessment of a modelled change in supply in meeting the demand for sports halls and swimming pools and their distribution up to 2041, based upon meeting an annual housing requirement of 839 dwellings per year (based upon the December 2023 NPPF standard method).

- ***Local participation priorities:*** Establishing any local priorities for the use of sports facilities, such as those relating to corporate health and well-being policies.

- ***Sport-specific priorities:*** Determining through consultation with the governing bodies of sport and a local sports clubs survey, whether there are any sport-specific priorities for Tonbridge and Malling.

The information was collated and analysed in a facilities demand report, for evaluation and approval by the project steering group.

2.5 Assessing the balance between sports facilities supply and demand

To complete Stage B of the process, the supply and demand information was brought together for each type of facility to establish:

- ***Quantity:*** Are there enough facilities with sufficient capacity to meet needs?
- ***Quality:*** Are the facilities fit for purpose for the users?
- ***Accessibility:*** Are the facilities in the right physical location for the users?
- ***Availability:*** Are the facilities available for those who want to use them?

The information has been collated and analysed in a Stage B report.

2.6 Applying the assessment - Developing the strategy

The results of the assessment will be applied to produce a Sports Facilities Strategy for the borough, which will include:

- ***Options for provision:*** The options for meeting current and future facilities needs were identified under Sport England's recommended headings of 'Protect', 'Provide' and 'Enhance'.
- ***Policy recommendations:*** Arranged under the headings of 'Protect', 'Provide' and 'Enhance', planning policy recommendations were developed to ensure that the implementation of the strategy will be supported by the provisions of the Local Plan.
- ***Strategy implementation:*** An action plan which identifies the ways in which the strategy can be implemented, subject to human and financial resource availability, but a wide range of stakeholders from the public, voluntary and commercial sectors.

2.7 Sources of information

Information was gathered throughout the process from a wide range of consultees including:

- ***Sport England:*** Guidance on the assessment methodology.
- ***Tonbridge and Malling Borough Council:*** Consultation with officers from planning policy and leisure.
- ***TM Active:*** Data from the leisure trust contracted to run the key council-owned facilities.
- ***Other local sports facilities providers:*** Consultation with organisations such as local sports clubs and commercial health and fitness operators on usage levels and spare capacity.

- ***Neighbouring local authorities:*** Information on their sports facilities assessments and the impact of any cross-border issues was obtained from Maidstone Borough Council, Tunbridge Wells Borough Council, Sevenoaks District Council, Gravesham Borough Council and Medway Council.

- ***Active Kent and Medway:*** Information on local and wider strategic priorities.

- ***Governing bodies of sport:*** Information on local and wider strategic priorities and local supply and demand information.

- ***Sports clubs:*** Information on sports facilities provision and use, current and future needs and opinions on quality, which was submitted via an on-line survey.

- ***Schools:*** Information on sports facilities provision and use, plus attitudes towards community use, which was submitted via an on-line survey.

- ***Town and parish councils:*** Information on sports facilities provision and use, current and future needs and opinions on quality, which was submitted via an on-line survey.

2.8 Summary

Assessing sports facilities needs in Tonbridge and Malling using the approach advocated by Sport England in its *'Assessing Needs and Opportunities Guidance'* and *'Strategic Outcomes Planning Guidance'* has ensured that the exercise is both robust and evidence-based and as a result complies with the provisions of the Government's national planning policy framework.

3 THE LOCAL CONTEXT FOR FACILITIES PROVISION

3.1 Introduction

This section outlines the context within which sports facilities provision has been considered in Tonbridge and Malling.

3.2 Background

3.2.1 Location

Tonbridge and Malling borough is in north-west Kent. It occupies approximately 93 square miles covering an area from the North Downs at Burham and Snodland in the north to Tonbridge in the south. The River Medway meanders north-east through the borough towards the Medway Gap. The borough shares boundaries with Maidstone Borough Council, Tunbridge Wells Borough Council, Sevenoaks District Council, Gravesham Borough Council and Medway Council.

3.2.2 Settlement pattern

The main urban areas of the borough comprise Tonbridge, the Medway Gap (Aylesford, Ditton, Larkfield and Leybourne), Kings Hill, Snodland and the part of Walderslade that lies within the borough. As defined at the time of preparing the strategy, there were five Rural Service Centres at Borough Green, East Peckham, Hadlow, Hildenborough and West Malling and a range of other smaller rural settlements. Based on the 2021 census, the population of Tonbridge and Malling comprised approximately 65% within urban areas whilst the rural population comprised around 35%.

3.2.3 Landscape

Nearly three quarters of the Borough lies within the Metropolitan Green Belt where, other than a very limited range of uses, there is a strong presumption against development unless justified by very special circumstances for sites not otherwise allocated in the Local Plan. Much of the remaining part of the Borough is covered by the defined Strategic Gap which seeks to assist in separating Maidstone and the Medway Towns from settlements in the north of the borough, Areas of Outstanding Natural Beauty, areas liable to flood and sites of nature conservation interest. These designations constrain the location and extent of potential built development.

3.2.4 Transport links

The borough has a number of important roads passing through it. There are three motorways, the M2, M20 and the M26, four major west-east roads (A20, A21, A25 and A26) and three other north-south roads (the A227, A228 and A229). Two mainline rail routes provide links with London and the Kent coast.

3.3 Demography

3.3.1 Current population

The 2021 census data for Tonbridge and Malling indicates 132,200 residents. This represents an increase of 11,400 people (9.4% growth) since the 2011 Census figure of 120,800.

3.3.2 Age structure

Analysis of the 2021 census data shows that Tonbridge and Malling has a relatively youthful age profile compared with both Kent and England. The average age of residents of the borough is 42.4 years, compared with a national average of 43.1 years.

Age	*Tonbridge and Malling No.*	*Tonbridge and Malling %*	*Kent %*	*England %*
0-15	24,854	18.8%	17.8%	18.4%
16-65	81,964	62.0%	61.8%	63.2%
65+	25,382	19.2%	20.4%	18.4%
Total	***132,200***	***100.0%***	***100.0%***	***100.0%***

3.3.3 Sub-areas

To assist with analysing provision at a more local level and in particular to assess the differential spatial impact on supply and demand for sports facilities arising from housing growth the borough has been divided into two sub-areas. These have been selected on the basis that they comprise discrete areas within which the resident population will typically look to access sports facilities locally. The sub-area ward populations are based upon ONS 2021 small-area estimates and are as follows:

Sub-area	*Wards*	*Ward Population 2021*	*Sub-area Population 2021*
Tonbridge and surrounds	Hildenborough	5,925	56,018
	Judd	6,517	
	Vauxhall	9,249	
	Cage Green and Angel	9,390	
	Higham	6,527	
	Trench	5,822	
	Bourne	5,763	
	East and West Peckham, Mereworth and Wateringbury	6,818	
The Mallings and surrounds	Pilgrims with Igtham	6,042	76,182
	Borough Green and Platt	5,975	
	East Malling, West Malling and Offham	8,641	
	Kings Hill	8,045	
	Aylesford South and Ditton	9,135	
	Birling, Leybourne and Ryarsh	6,162	
	Larkfield	9,262	
	Aylesford North and North Downs	8,512	
	Snodland West and Holborough Lakes	5,685	
	Snodland East and Ham Hill	5,665	
	Walderslade	3,056	

3.3.4 Population growth

The ONS 2018 sub-national population projections forecast a population of 153,604 by 2042, an increase of 21,404 (or 16.2%). Comparison of the 2021 census data with the 2018 sub-national population projections for 2042 shows that the percentage of people aged under 65 will fall from 80.8% to 77.0%, with proportionate population increase amongst those aged over 65.

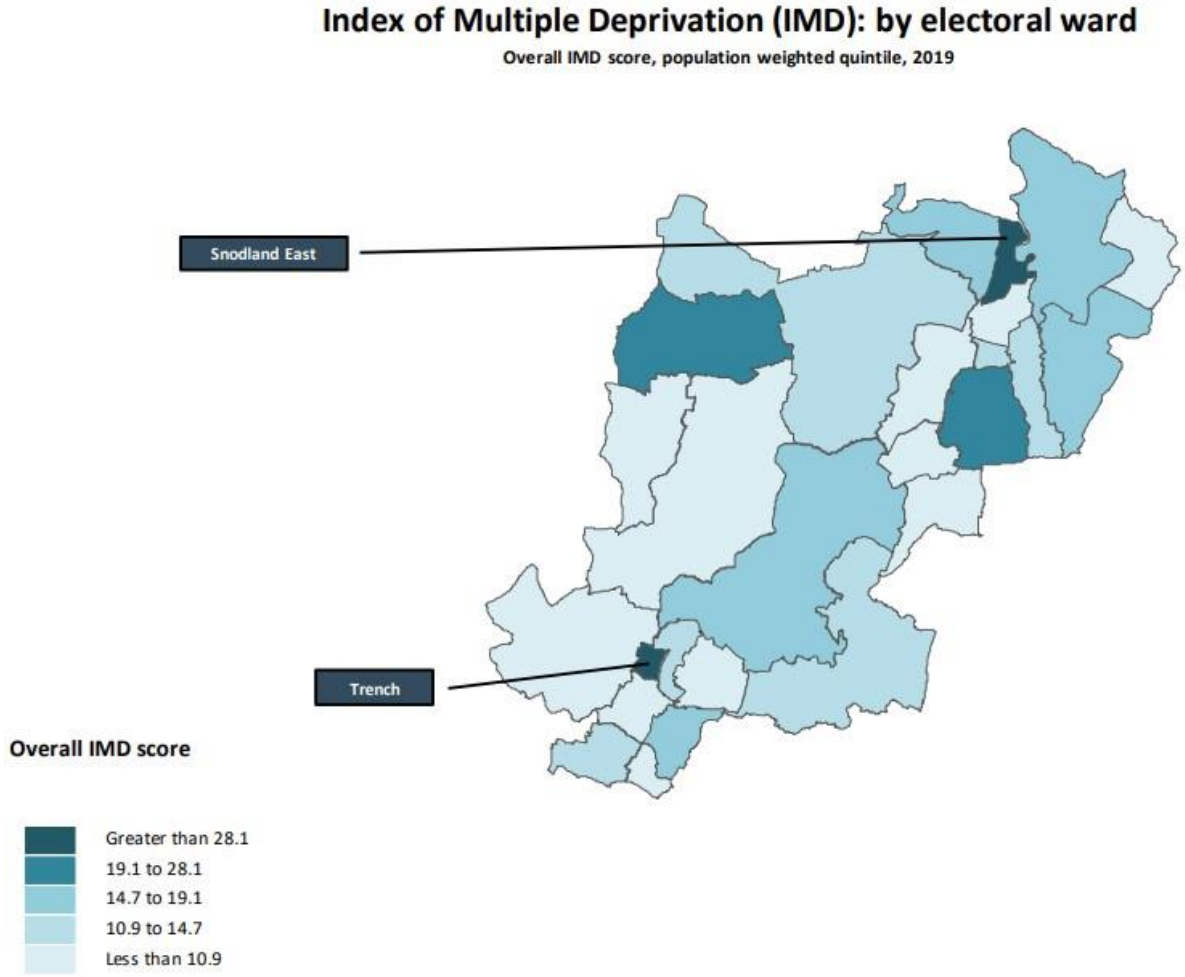
Age	*Population 2021*	*% 2021*	*Population 2042*	*% 2042*
0-15	24,854	18.8%	28,577	18.6%
16-65	81,964	62.0%	89,669	58.4%
65+	25,382	19.2%	35,358	23.0%
Total	***132,200***	***100.0%***	***153,604***	***100.0%***

3.3.5 Housing needs

The location of population growth will be determined in part by housing development allocations. Objectively assessed housing need amounts to 1,090 dwellings per year (23,544 dwellings by 2042). The precise location of development will be determined by the Local Plan, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 54,151 to 186,351, which is significantly more than the ONS projection of 21,204 up to 2042.

3.3.6 Deprivation

The English Indices of Deprivation (2019) show that the borough is ranked 236 out of 317 local authority areas in England on a range of deprivation issues. Although no areas of Tonbridge and Malling are ranked as amongst the 10% most deprived in the country, the borough has experienced the largest increase in deprivation relative to other areas of Kent in the period since 2015. 9.6% of children in the borough (2,539 people) live in absolute low income families, whilst a further 13.1% of children (3,469) live in relative low income families. Variations in deprivation by ward in 2019 are shown in the map below, although some ward boundaries have subsequently changed:



3.3.7 Ethnicity

According to the 2021 census, the population in Tonbridge and Malling is predominantly white (93.3%), with non-white minorities representing the remaining 6.7% of the population, well below the England average of 14.6%.

3.3.8 Health

Local health indices recorded in Public Health England's *'Health Profile for Tonbridge and Malling'* (2019) show that in general the health of people in the borough is around the average for England as a whole, although:

- Life expectancy is 5.1 years lower for men and 5.6 years lower for women in the most deprived areas of the borough than in the least deprived areas.
- The prevalence of obese children aged 10-11 years is 17.4%, compared with 20.0% in the south-east region and 23.4% nationally.
- 63.3% of the adult population of the borough is classified as overweight or obese, compared with 62.7% in the south-east region and 63.8% nationally.

3.4 Sport and physical activity

3.4.1 Participation rates

Sport England's *'Active Lives'* survey measures physical activity rates amongst people aged 16 and over at district, county, regional and national levels. The definitions used in the survey are as follows:

- ***Sport and physical activity:*** This includes at least 10-minutes of moderate or higher intensity sports activities, walking and cycling for leisure or travel, fitness and dance.
- ***Active:*** The 'Active' population is defined as those doing at least 150 minutes of the above activities per week.
- ***Fairly active:*** The 'Fairly active' population is defined as those doing between 30 and 149 minutes of the above activities per week.
- ***Inactive:*** The 'Inactive' population is defined as those doing 30 minutes or less of the above activities per week.

The proportion of the adult (16+) population who are active for at least 150 minutes per week in Tonbridge and Malling between 2015 and 2022 is tabulated below and shows that whilst rates have fluctuated over the survey periods, there is a slight downward trend, primarily due to the effects of the covid pandemic:

Nov '15 - Nov '16	*May '16 - May '17*	*Nov '16- Nov '17*	*May '17- May '18*	*Nov '17- Nov '18*	*May '18- May '19*	*Nov '18- Nov '19*	*May '19- May '20*	*Nov '19- Nov '20*	*May '20- May '21*	*Nov '20- Nov '21*	*Nov '21- Nov '22*	*% Change*
66.3%	66.9%	66.8%	67.4%	68.8%	69.5%	69.4%	66.0%	66.0%	66.6%	65.1%	64.2%	-2.5%

In comparative terms, the most recent activity levels are above the county and national figures, but below the regional average:

Area	*Active*	*Fairly active*	*Inactive*
Tonbridge and Malling	64.2%	13.1%	22.7%
Kent	63.5%	12.2%	24.2%
South-east England	66.5%	11.4%	22.1%
England	63.1%	11.1%	25.8%

3.4.2 Demographic variations

The *'Active Lives'* survey national level data identifies that there are significant demographic variations in participation rates:

- ***Gender:*** Men's participation rates are higher at 65% than women's at 61%.

- ***Socio-economic groups:*** Those in routine/semi-routine jobs and those who are long-term unemployed or have never worked have lower participation rates (54%) than those in professional/managerial roles (72%).

- ***Age:*** Activity levels decrease with age, from 70% in the 16 - 34 age group, to 66% on the 35 - 54 age group, 61% for 55 - 74 year olds to 40% for those aged 75 and over.

- ***Disability and long-term health conditions:*** Activity is less common for disabled people or those with a long -term health condition (47%) than those without (68%).

- ***Ethnicity:*** Participation rates are lower for minority ethnic groups than for the White population and are lowest for those of Asian heritage (54%).

3.4.3 Sports club membership

The 'Active Lives' survey also records rates of sports club membership amongst people aged 16 and over and who participated at least twice in the previous 28 days. The figures below show that rates are higher in Tonbridge and Malling than for all the wider geographical comparators:

Tonbridge and Malling	*Kent*	*South-East*	*England*
44.5%	38.3%	41.9%	40.2%

3.5 The local sports facilities supply network

Sports facilities provision in Tonbridge and Malling comprises a mixed economy involving the public, voluntary and commercial sectors. The key providers are as follows:

- ***Tonbridge and Malling Borough Council:*** The council owns the borough's public leisure centres at The Angel Centre in Tonbridge, Tonbridge Swimming Pool, and Larkfield Leisure Centre. The facilities are managed by TM Active, a charitable trust.

- ***Schools:*** Schools are significant sports facilities providers in the borough, although not all provision is fully community accessible. The most significant of these is Tonbridge School.

- ***Sports clubs:*** Voluntary sector sports clubs provide and run a range of mostly smaller facilities for example Snodland Community Centre.

- ***Commercial providers:*** The commercial sector provides a range of health and fitness facilities. The largest of these is the David Lloyd Club in Kings Hill.

3.6 The implications for sports facilities provision

The implications of the local context for sports facilities provision in Tonbridge and Malling are as follows:

- ***Transport links:*** The transport links, both internally and externally to the borough make sports facilities accessible to a wide catchment area, creating the potential for significant imported and exported demand.

- ***An ageing population:*** Whilst the borough has comparatively youthful age profile at present, demographic change by 2042 will see a significant increase in the proportion of people aged over 65. Since sport and physical activity rates typically decline with age, the market for local sports facilities will evolve accordingly.

- ***Population growth:*** The ONS 2018 sub-national population projections forecast an increase of 21,404 people by 2042 or 16.2%. If housing targets are met, population growth could be as high as 54,151 people or a total of 186,351, a 41.0% increase. This will increase demand for facilities for sport and physical activity accordingly.

- ***Overall sports participation rates:*** Local participation rates in sport and physical activity have fallen over the past five years (based upon Sport England's *'Active Lives'* survey) but are still above the respective national and county figures.

- ***Facilities supply:*** Sports facilities are provided by a range of owners and operators from the public, education and commercial sectors, which highlights the need for and benefits of a strategic approach to co-ordinating provision.

4 STRATEGIC INFLUENCES ON FACILITIES PROVISION

4.1 Introduction

As a prelude to the assessment of supply and demand for facilities in Tonbridge and Malling, this section reviews the relevant policies and priorities of the council and its strategic partners, to establish:

- The key relevant policies and local strategic outcomes.
- The extent to which these are convergent or divergent in respect of sport and physical activity.

4.2 Tonbridge and Malling Borough Council Corporate Strategy

4.2.1 Corporate vision

The council's current aspirations for the borough are set out in its *'Innovation, Transformation and Delivery: Corporate Strategy 2023 - 2027* (2020). The vision of the plan is 'to be an innovative and forward-thinking council, that leads the people and businesses of the borough towards a vibrant, prosperous and sustainable future'.

4.2.2 Corporate values and priorities

To achieve this vision the Strategy sets out four priorities:

- Efficient services for all our residents, maintaining an effective council.
- Sustaining a borough which cares for the environment
- Improving housing options for local people whilst protecting our outdoor areas of importance
- Investing in our local economy to help support residents and businesses and foster sustainable growth.

The strategy states the council's commitment to 'continue our successful management of parks, open spaces and leisure centres so the best recreational facilities are available to everyone'.

4.3 Tonbridge and Malling Borough Council Development Plan

TMBC's adopted local development plan is currently made up of the following documents which, will be replaced by the new Local Plan once adopted.

- Core Strategy.
- Development Land Allocations DPD.
- Tonbridge Central Area Action Plan.
- Managing Development and the Environment DPD.

The Core Strategy vision and policies will be updated in preparing the new Local Plan, this will be informed by this evidence and good practice approaches. This will guide the delivery of future growth and infrastructure in the borough.

4.4 Active Kent and Medway

Active Kent and Medway is the county sports partnership, one of a network of 43 active partnerships across the country. It works with sports clubs and organisations and a range of partners in the public, private and voluntary sectors to increase participation in sport and physical activity. Its strategy *'Move Together'* (2023) covers the period 2023-27. It seeks to achieve the following.

- Connecting communities - 'Making it easier for people to be active locally and using sport and physical activity's unique ability to make places better to live in and bring people together, particularly where inequalities are greatest' (page 8).
- Health and wellbeing - 'Creating partnerships that enable everyone to benefit from an active lifestyle' (page 9).
- Children and young people - 'Enabling children and young people to enjoy being active and creating the right foundations for a long, active and healthy life' (page 10).
- Supporting sport - 'Supporting local organisations to better understand their community and to deliver activities that are appropriate to people's needs and motivations' (page 11).
- Active environments - 'Creating and protecting places and spaces that make it easier for people to be active' (page 12).

4.5 Kent Joint Health and Wellbeing Strategy

The current Kent Health and Wellbeing Strategy 2018 - 2021, published by Kent County Council, has the vision 'to improve health and wellbeing outcomes, deliver better coordinated quality care, improve the public's experience of integrated health and social care services and ensure that the individual is involved and at the heart of everything we do' (page 5).

The outcomes include 'effective prevention of ill health by people taking greater responsibility for their health and wellbeing' (page 5). The Strategy states that 'shaping the physical environment of the community so that it can better promote healthier lifestyles is central to… councils' regulatory health improvement role. The new National Planning Policy Framework highlights the role of the planning system in facilitating social interaction and creating healthy, inclusive communities. This includes measures aimed at reducing health inequalities, improving access to healthy food and reducing obesity, encouraging physical activity, improving mental health and wellbeing, and improving air quality to reduce the incidence of respiratory diseases' (page 19).

4.6 The Government's Planning Policies

4.6.1 Introduction

In July 2023, the Government published an update to the *'National Planning Policy Framework'* setting out its economic, environmental and social planning policies for England. Taken together, these

policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.

4.6.2 Sustainable development

The purpose of the planning system is to contribute to the achievement of sustainable development. Sustainable development means development that meets the needs of the present without compromising the ability of future generations to meet their own needs' and there is a presumption in favour of sustainable development.

4.6.3 Promoting healthy and safe communities

'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- 'Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other - for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages.

- Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion - for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas.

- Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs - for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

4.6.4 Sport and leisure facilities

To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- 'Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.

- Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.

- Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.

- Ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.

- Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services'.

4.6.5 Planning Practice Guidance

The Government also issues *'Planning Practice Guidance'* and the following is of particular relevance:

- ***Open space, sport and recreation provision:*** 'Open space should be taken into account in planning for new development and considering proposals that may affect existing open space. It can provide health and recreation benefits to people living and working nearby'.

- 'Authorities and developers may refer to Sport England's guidance on how to assess the need for sports and recreation facilities. Local planning authorities are required to consult Sport England in certain cases where development affects the use of land as playing fields. Where there is no requirement to consult, local planning authorities are advised to consult Sport England in cases where development might lead to loss of, or loss of use for sport, of any major sports facility, the creation of a site for one or more playing pitches, artificial lighting of a major outdoor sports facility or a residential development of 300 dwellings or more'.

- ***Healthy and safe communities:*** 'Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making. Development proposals should support strong, vibrant and healthy communities and help create healthy living environments which should, where possible, include making physical activity easy to do. Opportunities for healthy lifestyles must be considered (e.g. planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity and promotes high quality open spaces and opportunities for play, sport and recreation)'.

The built and natural environment have key roles in supporting and enabling, health, wellbeing, and physical activity. The Tonbridge and Malling Sports Facilities Strategy addresses the extent to which existing sports facilities and the programmes that they deliver, provide accessible and appropriate opportunities to be active and proposes recommendations where necessary.

4.7 The Government's Sports Strategy

4.7.1 Introduction

The Government's sports strategy *'Get Active - A Strategy for the Future of Sport and Physical Activity'* (2023) contains three main priorities, outlined below.

4.7.2 Driving participation and addressing inactivity

- 'Ensuring everyone is focused on increasing physical activity, meaning fewer inactive children, and narrowing the gap on inactivity where groups are not being reached, with visible progress across the country by 2030'.

- 'Setting the future direction for facilities and spaces where people can be active by delivering multi-million pound investment into grassroots facilities and setting a clear strategic ambition for the future. This will mean facilities that reflect the needs of local communities, supported by hundreds of millions of pounds of government and local authority investment'.

4.7.3 Strengthening the integrity of sport

- 'Help the sector to be welcoming to all, by promoting women's and disability sport, championing diversity across the sector and holding the sector to account for investing in these groups. This will mean groups feel the benefit of public and private investment, that we see meaningful progress by 2030, and that cultural issues which put people off sport are relentlessly tackled'.

- 'Improve how issues and concerns are dealt with in the sector, starting by launching a call for evidence around sport integrity issues. This will increase confidence in sport so that everyone knows that their welfare is at the heart of the sport system, whatever sport they play'.

4.7.4 Making sport more sustainable

- 'Supporting the sector to access additional, alternative forms of investment to help it continue to grow and thrive, and by highlighting best practice, good governance mechanisms, and opportunities offered by technology and innovation. This will allow sport to thrive for future generations and support the continuation of our sporting institutions'.
- 'Working towards a more environmentally sustainable sector that delivers on the government's net-zero ambitions. We will do this by championing the role that sport can play in sustainability, and bringing together government departments, the sport sector and subject matter experts to share information and provide support'.

4.8 Sport England Strategy

4.8.1 Vision

Sport England's strategy *'Uniting the Movement'* (2021) contains a vision for 'a nation of more equal, inclusive and connected communities. A country where people live happier, healthier and more fulfilled lives'.

4.8.2 Context

The strategy concludes that 'there are deep-rooted inequalities in sport and physical activity, which mean there are people who feel excluded from being active because the right options and opportunities are not there:

- Disabled people and people with a long-term health condition are twice as likely to be physically inactive than those without a disability or health condition.

- People from a lower socioeconomic group (NS-SEC 6-8) are more likely to be inactive than people in higher social groups.

- Women are less active than men and this gender gap starts with girls being less active from a very young age.

- People from Asian and black backgrounds are far more likely to be physically inactive than people who are white'.

4.8.3 Advocating movement, sport and physical activity

Proposed actions include:

- 'Continue to build, establish and grow partnerships and a common purpose across both the government and our sector to join up policies, strategies and approaches'.

- 'Continue to develop and deliver behavioural change campaigns, building on the success of *'This Girl Can'*, *'We Are Undefeatable'* and *'Join the Movement'*, to put movement, sport and physical activity at the forefront of national conversations'.

- 'Keep building evidence that shows the links between the issues we all care about as a nation and the value of movement, sport and physical activity as part of the solution'.

- 'Grow the extent to which we communicate, both to people and organisations, the power of getting active to help strengthen public consensus around the importance of being physically active'.

4.8.4 Five key issues

These are identified as:

- ***Recover and reinvent:*** 'Recovering from the biggest crisis in a generation and reinventing as a vibrant, relevant and sustainable network of organisations providing sport and physical activity opportunities that meet the needs of different people'.

- ***Connecting communities:*** Focusing on sport and physical activity's ability to make better places to live and bring people together.

- ***Positive experiences for children and young people:*** Unrelenting focus on positive experiences for all children and young people as the foundations for a long and healthy life.

- ***Connection with health and wellbeing:*** Strengthening the connections between sport, physical activity, health and wellbeing, so more people can feel the benefits of, and advocate for, an active life.

- ***Active environments:*** Creating and protecting the places and spaces that make it easier for people to be active.

4.8.5 Active Environments

The key proposals for facilities are contained in the 'Active Environments' theme. This identifies three types of provision:

- ***Dedicated sport and physical activity facilities:*** 'Dedicated sport and leisure facilities like leisure centres need to be co-created, well designed, supported and maintained to benefit the local community and their users'.

- ***Other community spaces:*** 'Not usually designed exclusively for exercise, and certainly not for specific sports, these places are a vital resource for many and the activity they host provides a useful income to the venue. They may never be perfect competition or training spaces, but they attract people who might never go to a sports club, leisure centre or private

gym. The development of community spaces like these is important to people who are regularly or newly active'.

- ***The wider built environment:*** 'These places and spaces influence how much we move. Good design can help to increase activity levels by encouraging walking and cycling. This means connecting dedicated sport and activity facilities and community spaces, by making it easy for people to walk and cycle, by better design and by using the built and natural environments around us'.

4.8.6 Strategic Outcomes Planning Guidance

In May 2019 Sport England supplemented its guidance on the production of sports facilities strategies by publishing *'Strategic Outcomes Planning Guidance'*. The approach advocated the following:

- Developing an understanding of the wider local strategic outcomes of the study area.
- Using a cross-sector approach to identify local community needs and priorities.
- Establishing the contribution that sport and physical activity can make.
- Securing stakeholder 'buy-in' to the shared local outcomes.

The aim is to ensure that the development of sports and leisure facilities is not just an end in itself but is fully integrated into the strategic objectives of a range of key stakeholders in any given area. For example, rationale for the design, siting and operation of a new swimming pool in addition to the obvious benefits for sport and physical activity, should include the role it can play in delivering objectives relating to health inequalities, economic regeneration, tourism and socio-economic deprivation.

The Tonbridge and Malling Sports Facilities Strategy addresses the extent to which existing sports facilities and the programmes that they deliver address Sport England's new strategic priorities and in particular the emphasis on non-specialist community spaces or informal facilities.

4.9 The implications for shared strategic outcomes

4.9.1 Policy convergence

The review of strategic influences on sports facilities provision in Tonbridge and Malling identifies policy convergence on the following issues:

- ***Active, healthy communities:*** There is strong policy support for the creation of active, healthy communities, including the provision of affordable accessible facilities with appropriate activity programmes.
- ***Active design:*** Ensuring that the community provision creates opportunities for active travel and an attractive range of co-located facilities is embedded in local and wider policies.
- ***Protect and retain:*** Local and national planning policy is supportive of protecting and retaining sports facilities for which there is an assessed need.
- ***Integration with health and social care:*** Closer links with the health and social care system, to ensure that there is better integration between the needs of low participant groups and the sport and physical activity opportunities provided is a strong theme.

- ***Low participant groups:*** There is universal recognition of which groups have lower engagement with sport and physical activity and a shared policy commitment to address this.

4.9.2 Shared strategic outcomes

Based upon the shared policy influences, the shared strategic outcomes that provide the underpinning rationale for providing sports facilities in Tonbridge and Malling are as follows:

- To promote active, healthy communities in the borough, local stakeholders will support the provision of sustainable community sport and leisure facilities and the spaces and infrastructure that individuals, clubs, schools and individuals can access and use to take part.

- The network of sports facilities and supporting community infrastructure will be reviewed to ensure that the quantity, quality, accessibility and availability is appropriate to the needs of existing and prospective users.

- Closer links will be developed with the health and social care system, including the co-location of health and sports facilities where feasible and appropriate, to ensure that there is better integration between the needs of low participant groups and the sport and physical activity opportunities provided.

5 SPORTS HALLS

5.1 Introduction

This section examines the provision of sports halls in Tonbridge and Malling. For the purposes of this analysis, sports halls are defined as indoor halls with multi-sport markings and minimum dimensions equivalent to three badminton courts (27m x 18m x 6.1m). The specific needs of gymnastics are assessed separately elsewhere in the Strategy but are included for completeness in the overall evaluation of sports hall needs. In addition to a borough wide examination of provision, Section 5.19 looks specifically at the Angel Centre in Tonbridge.

5.2 Quantity

5.2.1 Sports halls with community use

The location and dimensions of sports halls with community use in Tonbridge and Malling are below:

Site	*Address*	*Dimensions*	*Built*	*Sub-Area*
Angel Centre	Angel Lane, Tonbridge TN9 1SF	32m x 26m	1982	Tonbridge
Aylesford School	Teapot Lane, Aylesford ME20 7JU	33m x 18m	2007	Mallings
David Lloyd (Kings Hill)	King's Hill Avenue, West Malling ME19 4UA	34.5m x 20m	2005	Mallings
Homesdale School	Malling Road, Snodland ME6 5HS	33m x 18m	2006	Mallings
Hugh Christie School	White Cottage, Road, Tonbridge TN10 4PU	33m x 18m	2006	Tonbridge
Judd School	Brook Street, Tonbridge TN9 2PN	33m x 18m	2003	Tonbridge
Larkfield Leisure Centre	New Hythe Lane, Aylesford ME20 6RH	34.5m x 27m	1991	Mallings
Leigh Academy	Brook Street, Tonbridge TN9 2PH	34.5m x 20m	2000	Tonbridge
Malling School	Beech Road, West Malling ME19 6DH	33m x 18m	2007	Mallings
Sackville School	Tonbridge Road, Hildenborough TN11 9HN	34.5m x 20m	1994	Tonbridge
Tonbridge Grammar Sch.	Deakin Leas, Tonbridge TN9 2JR	34.5m x 20m	2009	Tonbridge
Tonbridge School	London Road, Tonbridge TN10 3AD	32m x 26m	2008	Tonbridge
Weald of Kent School	Tudeley Lane, Tonbridge TN9 2JP	34.5m x 20m	2016	Tonbridge
Wrotham School	Borough Green Road, Wrotham TN15 7RD	33m x 18m	2020	Mallings

Taken together these and other smaller facilities in the borough collectively provide a total of 81 badminton courts.

5.2.2 Sports halls without community use

There are no sports halls without community use in Tonbridge and Malling.

5.2.3 Sub-area analysis

The distribution of sports halls with community use by sub-area in Tonbridge and Malling is below:

Sub-area	*Sub-area population 2021*	*No. sports halls*	*Sports halls per capita*
Tonbridge and surrounds	56,018	8	1: 7,002
Mallings and surrounds	76,182	6	1: 12,697
TONBRIDGE & MALLING	***132,200***	***14***	***1: 9,443***

5.3 Quality

5.3.1 The criteria assessed

The quality of sports halls with community access was assessed by a non-technical visual inspection during a site visit to all facilities. The evaluation criteria were as follows:

- ***Playing area:*** The overall condition, playing surface, clear span roof height, lighting, spectator provision, equipment and fitness for purpose.
- ***Changing facilities:*** The capacity, condition and fitness for purpose.
- ***Disability access:*** The extent of full disabled access to the facility, including the provision of level access/ramps, dedicated changing, toilets and car parking.
- ***Maintenance and cleanliness:*** The standard of maintenance and cleanliness.
- ***General access:*** Including car parking, signposting, external lighting and proximity to public transport.

5.3.2 The basis of the ratings

The facilities were rated on a five-point scale, where 5 equates to 'very good' (highlighted in green below), 4 to 'good' (also highlighted in green below), 3 to 'average' (highlighted in yellow below), 2 to 'poor' and 1 to 'very poor' . The ratings for the sports halls in Tonbridge and Malling are shown in the table below.

Facility	*Playing area*	*Changing*	*Disability Access*	*Maintenance*	*General access*
Angel Centre	5	4	3	3	3
Aylesford School	5	5	4	4	4
David Lloyd (Kings Hill)	5	5	4	5	5
Hugh Christie School	4	4	4	4	4
Judd School	4	3	3	5	3
Larkfield Leisure Centre	4	4	4	5	5
Leigh Academy Tonbridge	4	4	4	5	4
Malling School	5	5	5	5	4
Sackville School	4	4	5	5	4
Tonbridge Grammar Sch.	4	4	4	4	4
Tonbridge School	5	4	4	5	5
Weald of Kent School	5	5	5	5	5
Wrotham School	5	5	4	5	4

5.4 Accessibility

Based on Sport England research, the 'effective catchment' for sports halls (defined as the time/distance travelled and the prevailing mode of transport used by up to 90% of facility users) is 20 minutes driving time. The whole population of the borough lives within 20-minutes' drive time of at least one community accessible sports hall.



5.5 Availability

The table below identifies the opening hours, price and booking arrangements, secured access via a formal Community Use Agreement (if applicable), used capacity in the peak periods and whether there is a secure of staffed access/reception.

Facility	*Opening hours and basis of use*	*Price and booking arrangements*	*Peak period usage levels*	*Secured access*
Angel Centre	Sun-Fri 8am - 9pm Sat 8am - 6pm Casual use/block bookings	Half hall £66 per hour priority card, £80.50 casual users. Badminton court priority card £13.50 casual hire,£12.90 concessions £6.70 Bookings in person, on-line or by phone.	47%	Yes
Aylesford School	Mon-Fri 6pm - 10pm Sat-Sun 9am - 10pm Block bookings	Whole hall £39 per hour. Bookings on-line.	76%	No
David Lloyd (Kings Hill)	Mon-Fri 6am - 11pm Sat-Sun 7am - 10pm Members only	Basic Membership £94.50 per month	63%	Yes
Homesdale School	Mon-Fri 6pm - 10.30pm Sat-Sun 9am - 10pm Block bookings	Whole hall £39 per hour.	75%	No
Hugh Christie School	Mon-Fri 6pm - 10pm Sat-Sun 9am - 10pm Block bookings	Whole hall £39 per hour. Bookings on-line.	75%	No
Judd School	Mon-Fri 6pm - 10pm Sat-Sun 9am - 10pm Block bookings	Whole hall £55 per hour.	52%	No
Larkfield Leisure Centre	Sun-Fri 8am - 9pm Sat 8am - 6pm Casual use/block bookings	Half hall £66 per hour priority card, £80.50 casual users. Badminton court priority card £13.50 casual hire,£12.90 concessions £6.70 Bookings in person, on-line or by phone	81%	Yes
Leigh Academy Tonbridge	Mon-Fri 5.30pm - 9.30pm Sat-Sun 8am - 10.30pm Casual use/block bookings	Whole hall £46 per hour. Badminton court £12.50 per hour Bookings on-line.	44%	No
Malling School	Mon-Fri 6pm - 10pm Sat-Sun 9am - 10pm Block bookings	Whole hall £39 per hour. Bookings on-line.	56%	No
Sackville School	Mon-Fri 6pm - 10pm Sat-Sun 9am - 9pm Block bookings	Whole hall £40 per hour.	17%	No
Tonbridge Grammar School	Mon-Fri 4pm - 9pm Block bookings	Whole hall £50 per hour.	42%	No
Tonbridge School	Mon-Fri 6am - 9pm Sat 8am - 9pm Sun 9am - 7.30pm Members only	Membership £69 per month Bookings on-line.	46%	No
Weald of Kent Grammar School	Mon-Fri 5.30pm - 10pm Sat 8.30am - 4.30pm Block bookings	Whole hall £75 per hour.	60%	No
Wrotham School	Sat-Sun 9am - 7pm Block bookings	Whole hall £50 per hour.	100%	No

5.6 Key findings on supply

The key findings are as follows:

- Per capita levels of sports hall provision vary substantially between the two sub-areas of the borough, with levels in the Tonbridge sub-area being double those in the Mallings sub-area.
- Eleven of the 14 sports halls with community use in the borough do not have secured community access, so in theory public usage could be rescinded at any time.
- The quality of sports halls in the borough is generally good, although the Angel Centre is in need of significant refurbishment. This is being addressed as part of a project to relocate and re-provide sports hall provision in Tonbridge Town Centre.
- The entire population within 20 minutes driving time of a sports hall.
- Pricing is broadly consistent between the local sports halls, although access to the David Lloyd (Kings Hill) and Tonbridge School sports halls is dependent on relatively high membership fees.
- Sport England recognises a measure of 'comfortable capacity', where a sports hall is regarded as effectively fully utilised when peak usage levels reach 80%. This reflects the fact that changeover periods between bookings, particularly those that involve removing and/or installing equipment, will reduce the usage time available. Only two sports halls in Tonbridge and Malling (Larkfield Leisure Centre and Wrotham School) are used to above 'comfortable capacity'.

5.7 Current demand for sports halls

5.7.1 Expressed demand

Actual expressed community use demand for sports halls in Tonbridge and Malling is as follows:

Facility	*Peak hours available*	*Peak hours utilised*	*% Peak utilisation*
Angel Centre	46	21	47%
Aylesford School	36.5	28	76%
David Lloyd (Kings Hill)	46	29	63%
Homesdale School	34	25.5	75%
Hugh Christie School	34	25.5	75%
Judd School	34	18	52%
Larkfield Leisure Centre	46	37	81%
Leigh Academy Tonbridge	36.5	16	44%
Malling School	34	19	56%
Sackville School	29	5	17%
Tonbridge Grammar Sch.	34	14	42%
Tonbridge School	34	16	46%
Weald of Kent School	34	20	60%
Wrotham School	14	14	100%
TOTALS	***492***	***288.5***	***58%***

5.7.2 Displaced demand

Displaced demand relates to users of sports halls from within the study area which takes place outside of the area. The following sports halls with community accessibility are located in adjacent local authority areas, close enough to the borough boundary to provide potential usage opportunities for Tonbridge and Malling residents.

Facility	*Address*	*Distance from Tonbridge and Malling*
Maidstone Grammar School	Barton Road, Maidstone ME15 7BT	2 miles
Maidstone Grammar Sch. for Girls	Buckland Road, Maidstone ME16 0TJ	2 miles
Maidstone Leisure Centre	Mote Park, Maidstone ME15 8NQ	3 miles
St Augustine Academy	Boughton Lane, Maidstone ME15 9QL	3 miles
The Maplesden Noakes School	Buckland Road, Maidstone ME16 0TJ	2 miles
Maidstone YMCA	Melrose Close, Maidstone ME15 6BD	2 miles
Knole Academy	Bradbourne Vale Road, Sevenoaks TN13 3LE	3 miles
Sevenoaks Leisure Centre	Buckhurst Lane, Sevenoaks TN13 1LW	3 miles
Sennocke Centre	High Street, Sevenoaks TN13 1HU	3 miles
Sir Joseph Williamson's School	Maidstone Road, Rochester ME1 3EL	1 mile
Strood Sports Centre	Watling Road, Strood ME2 3JQ	2 miles
Putlands Sports Centre	Mascalls Court Road, Tunbridge Wells TN12 6NZ	3 miles
Tunbridge Wells Sports Centre	St. Johns Road, Tunbridge Wells TN4 9TX	2 miles
Lordswood Leisure Centre	North Dane Way, Chatham ME5 8YE	1 mile
Chatham Grammar School for Girls	Rainham Road, Chatham ME5 7EH	1 mile

5.7.3 Unmet demand

There is no evidence of unmet demand for sports halls in Tonbridge and Malling at present. Average peak time usage is 51%, well below the 'comfortable capacity' figure of 80%, although two sites Larkfield Leisure Centre (at 81%) and Wrotham School (at 100%) are used to above 'comfortable capacity' and sites in the Mallings sub-area generally have high utilisation rates.

5.8 Assessments of need in neighbouring areas

The table below summarises strategic assessments of sports hall needs in neighbouring areas.

Local Authority	*Facilities assessment*	*Implications for Tonbridge and Malling*
Maidstone Borough Council	The *'Maidstone Sports Facilities Strategy'* (2019) states that 'there are nine community-accessible sports halls in Maidstone, plus one other facility without public access. There is no current spare peak-time sports hall capacity in the borough. Additional demand by 2031 will amount to the equivalent of 1.6 four-badminton court sized sports halls with full community access. Seven of the nine sports halls in the borough are on school sites, with limited midweek daytime access and only four halls offer regular weekend availability. None of the school facilities has secured community use'.	There is no spare capacity to serve demand from Tonbridge and Malling.

Local Authority	Facilities assessment	Implications for Tonbridge and Malling
Tunbridge Wells Borough Council	The *Tunbridge Wells Borough Indoor/Built Sports Facilities Needs Assessment 2017-2033'* (2018) concludes that there is sufficient capacity to meet current needs, but that demand equivalent to one additional sports hall will need to be accommodated by 2033.	Tunbridge Wells Leisure Centre is close enough to serve demand from Tonbridge and Malling and has some spare capacity to do this.
Sevenoaks District Council	The *'Sevenoaks Sports Facilities Strategy 2016-2025'* (2017) identifies that 'current and future need for sports hall provision can be accommodated in the district, given the slight over supply of badminton courts. In addition, there is significant capacity in all halls except Edenbridge Leisure Centre, so more use could be accommodated'.	Three facilities in the district have catchments that overlap Tonbridge and Malling, so there is potential to accommodate some demand from the borough using spare capacity.
Gravesham Borough Council	The *'Gravesham Indoor Sports Facilities Strategy and Action Plan 2016-2026'* (2016) identified an action to 'improve access to facilities during the daytime given the current reliance on educational facilities for indoor activity'.	There is no spare capacity to meet demand from Tonbridge and Malling.
Medway Council	The *'Medway Sports Facilities Strategy and Action Plan'* (2017) concludes that 'FPM supply and demand analysis identifies a small surplus of 4.29 badminton courts in the area'.	There are two facilities close enough to serve demand from Tonbridge and Malling and has some spare capacity to do this..

5.9 Sport-specific priorities

Analysis of sport-specific strategies and consultation with the governing bodies of sport produced a range of priorities in relation to local sports hall provision:

Sport	Facilities priorities	Local implications
Badminton	Badminton England's *'National Facilities Strategy 2012 - 2016'* (2012) is the most recent assessment of the requirements of facilities used for badminton: • The hall should have a sprung floor as a minimum. • The lighting must be suitable (no lights above the courts and no natural light). • There should be appropriate space around the court for safety. • The walls must be the right colour (green or blue). • The ceiling must be the appropriate height (6.7m). • Priority areas are identified for 'Community Badminton Networks'.	Tonbridge and Malling is not identified as a priority area for Community Badminton Networks.
Basketball	Basketball England's *'Growing Basketball Together 2018 - 2024'* (2018) contains a facilities objectives to 'develop, support and sustain a high-quality infrastructure network that inspires the next generation and meets the needs and demands of the game for the future'. • 'Enhance the playing experience through an appropriate network of innovative and inspirational facilities and playing environments that not only meet the needs and demands of the game but inspire growth within the sport'. • 'Pilot new and alternative pricing and booking models for indoor facilities to improve access and affordability for clubs and individuals supporting both formal and informal play'.	Tonbridge and Malling is not identified as a priority area.

Sport	*Facilities assessment*	*Local implications*
Gymnastics	British Gymnastics' *'Facility Strategy 2017 - 2021'* (2017) identifies a range of gymnastics facilities options: • **Standalone dedicated facilities -** Achievable for most clubs. Can provide for participation and competition. • **Multi-venue dedicated facilities -** For large club-based organisations looking to further expand opportunities. • **Dedicated facility as part of a multi-sport venue -** Most likely to be local authority-based projects. • **Non-dedicated space as part of leisure centre -** Ideal for club delivery and mass participation activities. • **Satellite venues -** Opportunities for clubs to scale up their programmes and increase activity options. • **Non-dedicated spaces in leisure centres -** Ideal for introductory level, mass participation programmes.	All of the options within the facilities hierarchy are relevant to gymnastics delivery in Tonbridge and Malling.
Judo	British Judo's *'Strategic Plan 2017 - 2021'* (2017) has an objective to increase participation to 50,000 members by 2021. There are no facilities objectives.	No specific implications.
Netball	England Netball's *'Adventure Strategy 2021 - 2031'* (2021). A Game for Life: This 'destination' has the following targets: • A 50% increase in the women playing netball across all life stages. • A year-on-year increase in the diversity of the netball playing population, with an ambition to reflect the diversity of the nation. • A countrywide accessible offer for men and boys. • 90% of all schools delivering a quality netball experience. • A clear and connected offer of choice for every community, with world class experiences in clubs and leagues at the heart of community netball. • A place to play within easy travel of every household.	Netball is a well-developed sport in Tonbridge and Malling and is seeking additional indoor and outdoor court space.
Table tennis	Table Tennis England's *'Facilities Strategy 2015* - 2025' (2015) identifies that table tennis takes place in a variety of settings: • **Formal club-led environments -** Consisting of dedicated table tennis facilities (equipped for and predominantly used by table tennis), school halls, community halls, church halls, multisport clubs and leisure centres. • **Informal social environments -** Including bars, workplaces, parks, sport-specific clubs and community spaces. To support sustainable clubs, the priorities are: • Establish a minimum of one accessible, high quality dedicated multi-table facility in every active county. • Support current clubs to ensure long-term security of use of their facilities and to develop facilities or access multisport and multi-use environments. To support the social recreational game, the priorities are: • Support the implementation of free-to-use outdoor tables, prioritising centres of population. • Establish a network of social table tennis venues.	Tonbridge and Malling is not identified as a priority area.
Volleyball	Volleyball England's *'Facilities Strategy'* (2009) is the most recent assessment of needs. The strategy identifies that a court size of 18m x 9m x 7.5m is required for National League standard play and below. It also states that 'the minimum width of standard sports halls should be raised to 20m from the current 18m, to allow two practice courts in a single hall'.	Tonbridge and Malling is not identified as a priority area.

5.10 Governing body of sport consultations

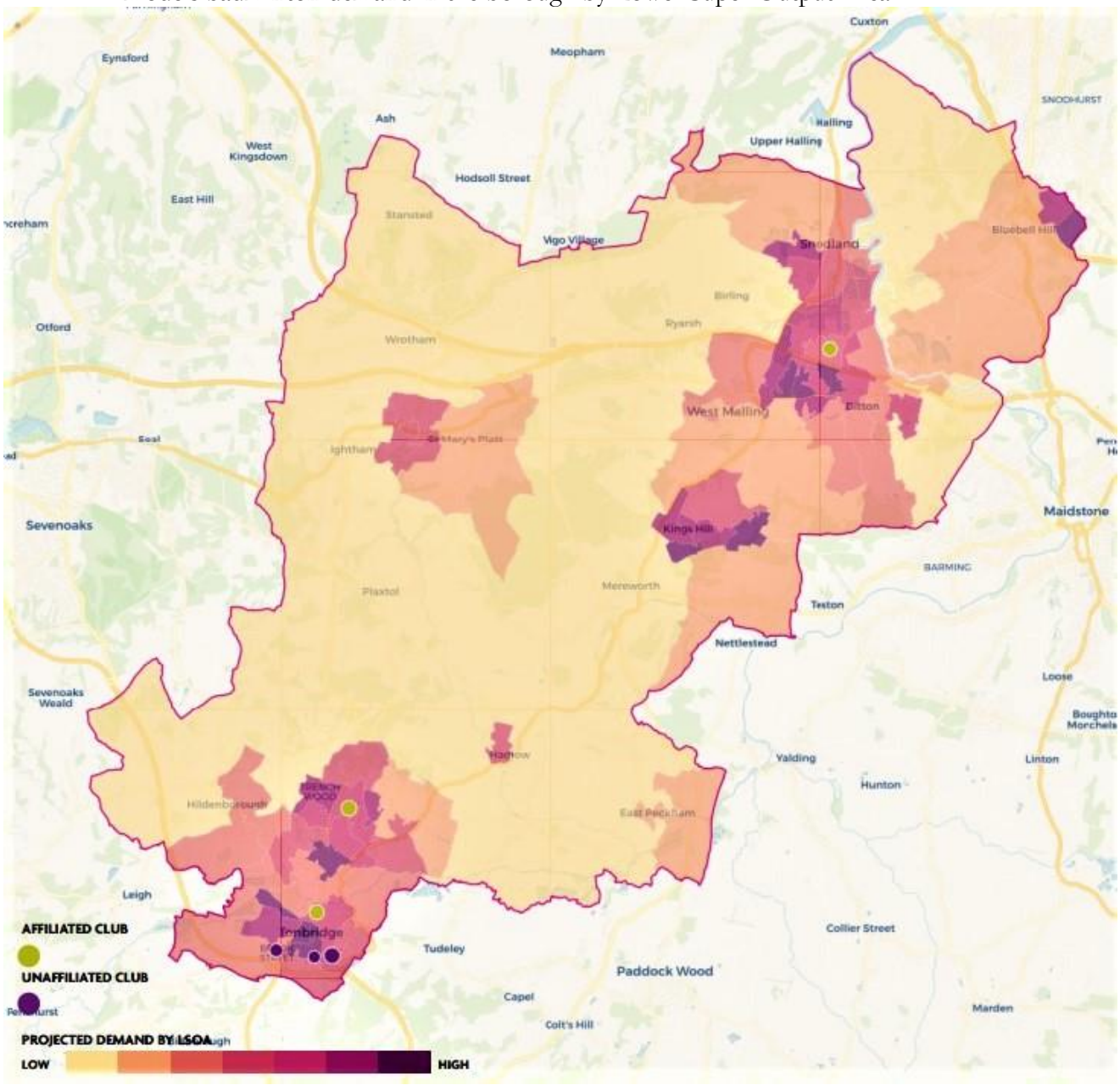
5.10.1 Badminton England

Consultation with Badminton England's Facilities Manager identified the following issues:

- ***Overview:*** 'The area is in need of a badminton centre which can serve the local community and be dedicated to badminton. We are due to release our strategy where we can look to support establishing these across the county'.

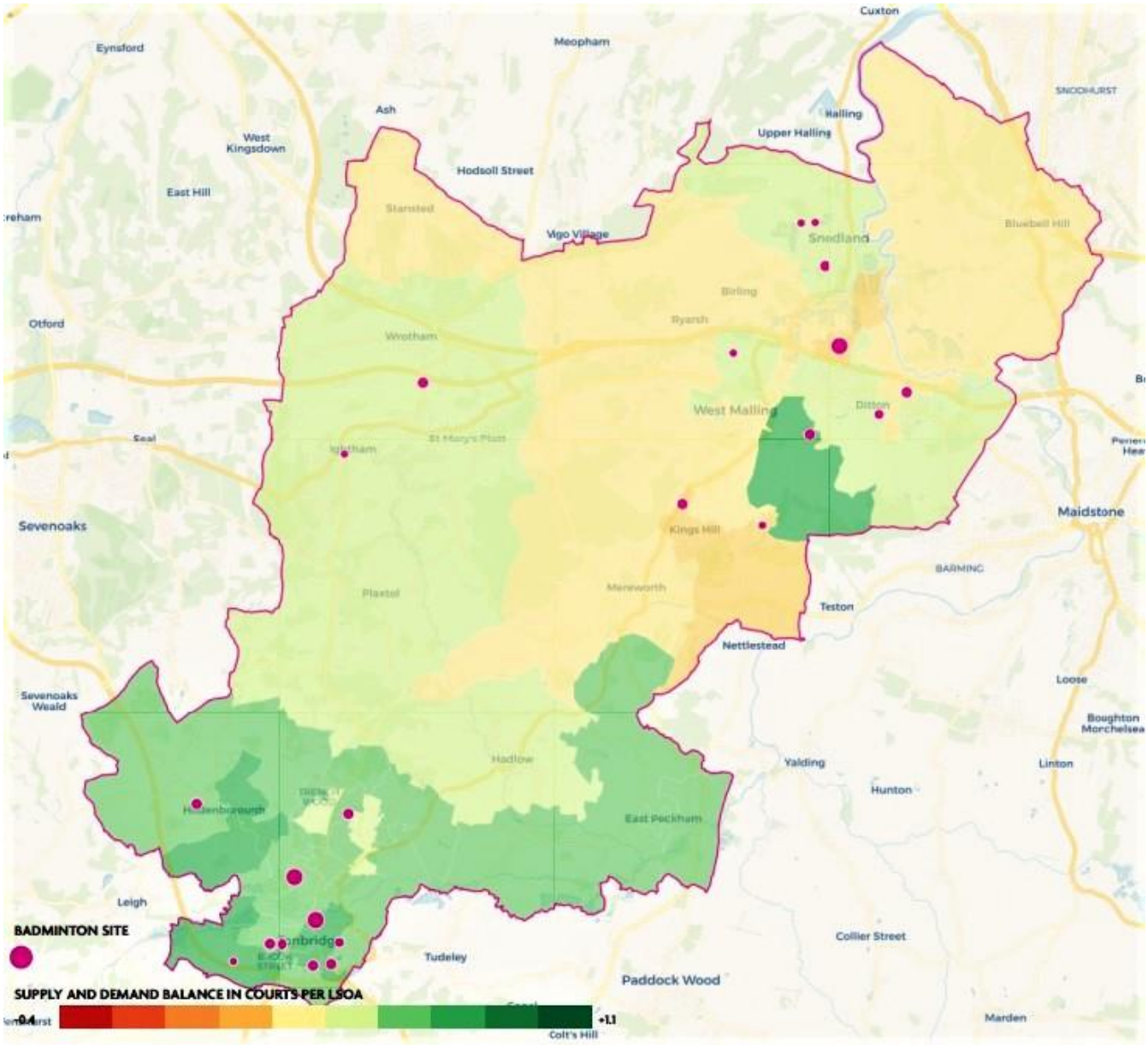
- ***Angel Centre:*** 'The Angel Centre is important for badminton with one of our larger clubs (Angel Badminton Club) playing out of the venue'.

- ***Current demand:*** There are currently six badminton clubs in the borough. The map below models badminton demand in the borough by Lower Super Output Area:



- ***Current supply:*** Local sports halls provide the equivalent of 73 badminton courts.

- ***Current supply demand balance:*** 'There is a current collective spare capacity of 3.4 badminton courts to meet existing badminton needs in the borough'. The map below shows that the geographical location of greatest unmet need is in the Kings Hill area.



- ***Future shortfall:*** 'There is a future collective spare capacity of 2.5 badminton courts to meet badminton needs in the borough in 2030'.

5.10.3 Basketball England

Consultation with Basketball England's Facilities Manager identified the following issues:

- ***Local demand:*** This is as follows.

Club	*Hime venue*	*Members*	*Teams*
B'Ballin	Hayesbrook Academy	17	2
East Grinstead Basketball Club	Sackville School	19	1
Maidstone Warriors Basketball Club	Aylesford School	29	2
TOTALS	**-**	***65***	***5***

- ***Supply-demand balance:*** Based on local sports hall provision, there is no unmet demand for basketball in Tonbridge and Malling either currently or anticipated in 2042.

5.10.3 England Netball

Consultation with England Netball's Facilities Development Manager identified the following:

- 'Most netball in Tonbridge and Malling is currently played on outdoor courts, with the exception of some Walking Netball at the Angel Centre'.

- 'Mallings and Maidstone Netball League, which currently has five outdoor courts in Aylesford has secured planning consent to provide three indoor courts and three outdoor courts at its current site. This will provide additional indoor capacity to accommodate extra netball programmes in the borough, without impacting on existing sports halls availability'.

5.10.4 Table Tennis England

Consultation with Table Tennis England's Area Manager (South-East) identified the following:

- 'Almost all the table tennis club fraternity are non-asset owning and are renters of leisure facilities or school/village halls. This means that suitable Table Tennis provision is very limited and subject to rental increases, or other booked events leading to cancellation'.

- 'There are no specialist table tennis facilities in the borough, but no club locally has reported problems with access to sports halls. There are no registered 'Premier' table tennis clubs in the borough'.

- 'There is a currently a focus on increasing youth participation especially at primary age and this area has been earmarked for one of the pilot projects. We are currently searching for suitable venues that can accommodate junior league participation for 6-8 weeks'.

5.11 Future demand for sports halls

5.11.1 Population growth

Two scenarios are considered:

- The ONS 2018 sub-national population projections forecast a population of 153,604 by 2042, an increase of 21,404 (or 16.2%).

- Objectively assessed Local Housing Need (LHN) amounts 1,090 dwellings per year (23,544 dwellings by 2042). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 54,151 to 186,351 or 41.0%.

5.11.2 Participation rates

One factor in considering future sports participation rates is to track historical trends, as a guide to possible future developments. The most recent covid-affected figures have been excluded as anomalous.

- ***National trends:*** Sport England's *'Active Lives'* survey records adult (16+) weekly participation rates for each sport at national level. The results for those sports that use sports halls are tabulated below. Badminton, Basketball and Tennis have also experienced statistically significant decreases, whilst only martial arts has achieved a statistically significant increase:

Sport	*Nov 2015-Nov 2016*	*May 2016-May 2017*	*Nov 2016-Nov 2017*	*May 2017-May 2018*	*Nov 2017-Nov 2018*	*May 2018-May 2019*	*Nov 2018-Nov 2019*	*May 2019-May 2020*	*% Change*
Badminton	2.1%	2.1%	2.0%	1.9%	1.8%	1.8%	1.7%	1.6%	-0.5%
Basketball	0.7%	0.7%	0.7%	0.7%	0.7%	0.6%	0.6%	0.6%	-0.1%
Gymnastics	0.6%	0.7%	0.7%	0.6%	0.6%	0.6%	0.5%	0.5%	-0.1%
Judo	0.1%	0.1%	0.1%	0.1%	0.0%	0.0%	0.1%	0.1%	0.0%
Martial Arts	0.4%	0.4%	0.5%	0.5%	0.6%	0.5%	0.5%	0.6%	+0.2%
Netball	0.7%	0.6%	0.6%	0.6%	0.6%	0.7%	0.7%	0.6%	-0.1%
Table Tennis	1.0%	1.0%	1.0%	1.0%	0.9%	0.9%	1.0%	0.9%	-0.1%
Tennis	2.0%	1.9%	1.9%	1.9%	1.7%	1.7%	1.6%	1.6%	-0.4%
Volleyball	0.2%	0.1%	0.2%	0.2%	0.2%	0.2%	0.1%	0.1%	-0.1%

- ***Local trends:*** Sport England's *'Active Lives'* survey recorded the proportion of the adult (16+) population who are active for at least 150 minutes per week in Tonbridge and Malling between 2015 and the present. The results are tabulated below and show that whilst rates have fluctuated over the survey periods, there is a downward trend between 2015 and 2022:

Nov '15 - Nov '16	*May '16 - May '17*	*Nov '16-Nov '17*	*May '17-May '18*	*Nov '17-Nov '18*	*May '18-May '19*	*Nov '18-Nov '19*	*May '19-May '20*	*Nov '19-Nov '20*	*May '20-May '21*	*Nov '20-Nov '21*	*Nov '21-Nov '22*	*% Change*
66.3%	66.9%	66.8%	67.4%	68.8%	69.5%	69.4%	66.0%	66.0%	66.6%	65.1%	64.2%	-2.5%

5.11.3 Future projections

Sport England has developed the Sport Facility Calculator (SFC), to help to quantify how much additional demand for key community facilities like sports halls, will be generated by population increases. The SFC uses Sport England survey data on who uses facilities and applies this to the population profile of the local area. This builds up a profile of usage, which can be then applied to estimate how much demand any given population would generate. This demand is then converted into the quantity of facilities needed and expressed as badminton courts to define sports hall needs. For the purposes of projecting future demand in Tonbridge and Malling current participation rates have been assumed since there have been no statistically significant increases since 2015, either locally in the borough or collectively for the sports that use sports halls. Two population scenarios are considered:

- The ONS 2018 sub-national population projections forecast a population of 153,604 by 2042, an increase of 21,404 (or 16.2%). Based upon this, the SFC calculates additional demand equivalent to 6.08 badminton courts, which equates to the equivalent of 1.52 four-badminton court sized sports halls with full community access.

- A projection based on assessed housing needs predicts a population of 168,864 by 2042, an increase of 54,141 or 41.0%. Based upon this, the SFC calculates additional demand equivalent to 15.39 badminton courts, which equates to the equivalent to 3.85 four-badminton court sized sports halls with full community access.

5.12 Key findings on demand

The key findings are as follows:

- There is significant spare capacity in sports halls in Tonbridge and Malling at present, with average peak utilisation rates of 51%, well below the 80% 'comfortable capacity' figure. However, Larkfield Leisure Centre (81%) and Wrotham School (100%) are currently used to above 'comfortable capacity' and sites in the Mallings sub-area generally have high utilisation rates.

- If future housing growth in the borough occurs mostly outside the Green Belt, given the relative lack of planning constraints there will be significant pressure to expand facilities provision in the Mallings sub-area. Used capacity at the six existing sports halls in the north of the borough averages 75% which is already close to the 80% 'comfortable capacity' figure. This means that the additional future demand as projected by Sport England's Sport Facility Calculator will need to be accommodated by spare capacity at facilities within 20-minutes driving time in the borough, which could in some circumstances include facilities in the south and west of the borough, and/or in neighbouring areas. The feasibility of this was modelled using Sport England's Facilities Planning Model, the findings of which are set out below. Please note that the location of future growth has not been confirmed at this time. This will be progressed through the Council's new Local Plan. Further modelling will therefore take place to understand future requirements, should the Council's objectively assessed housing need figure change.

5.13 Facilities Planning Model Assessment

5.13.1 Introduction

To supplement and complement the strategic assessment, TMBC commissioned an additional assessment of sports hall needs using the Sport England Facilities Planning Model (FPM) spatial modelling tool. The FPM study is a quantitative, accessibility and spatial assessment of the supply, demand and access to sports halls in the borough. It included three modelling 'runs'

- A baseline assessment of provision in 2023.

- A forward assessment of demand for sports halls and their distribution, based on the projected changes in population including residential development between 2023 and 2041.

- An assessment of a reduction in supply at The Angel Centre in meeting the demand for sports halls and their distribution up to 2041, given its potential role in town centre redevelopment.

5.13.2 Key findings

- ***Quantity:*** The total supply of sports halls in 2023 and 2041 is the equivalent of 81.0 badminton courts, of which 60.7 are available for community use in the weekly peak period. The unavailable courts represent 25% of the total supply.

- ***Quality:*** Of the six sports halls opened before 2000, the three public leisure centres have been modernised. Nine sports halls opened between 2000 and 2009 and none has been modernised.

- ***Used peak capacity:*** Current and future demand for Sports Halls in Tonbridge and Malling can be accommodated by the available capacity of the Borough's sports halls. Current demand is equivalent to 51% of capacity, demand in 2041 is equivalent to 62% of capacity and reduced provision at the Angel Centre by 2041 would still leave 63% capacity. This is well below Sport England's 'comfortable capacity' figure of 80%, which suggests that there is some spare capacity to accommodate additional demand. This is consistent with the findings of the Sports Facilities Calculator set out in 5.11.3.

- ***Location of demand:*** The geographical areas with the highest demand in the borough are south and north-east Tonbridge.

- ***Satisfied demand:*** In 2023 and 2041 there is sufficient capacity within a suitable travel time to meet 96% of the Borough's demand for sports halls. Of the satisfied demand, 84% is met within Tonbridge and Malling, with the remainder exported to neighbouring areas.

- ***Unmet demand:*** Unmet demand for sports halls is calculated at 4% of all demand in 2023 and 2041. This equates to 1.5 badminton courts in 2023 and 2.0 badminton courts in 2041. The two locations where most unmet demand can be met are Blue Bell Hill, at Junction 3 of the M2 and Aylesford, at Junction 6 of the M20 However, the small volume of demand is insufficient to consider providing new sports halls and will also include unmet demand from the neighbouring local authorities.

- ***Displaced demand:*** The FPM calculates that Tonbridge and Malling is a net importer of sports hall demand. In 2023 the Borough imported 1,635 more visits in the weekly peak period than it exported. 39% of imported visits come from Maidstone, 33% from Tunbridge Wells, 15% from Sevenoaks, 8% from Medway and 5% from Gravesham.

5.13.3 Conclusions

The conclusions from the FPM runs are as follows:

- 'The headline strategic overview is that Tonbridge and Malling's supply of sports halls can meet the current and future demand for sports halls. Population and demand for sports halls both increase significantly to 2041'.

- 'However, the distribution of demand and the hours that sports halls are available for community use, especially in the areas of highest demand, mean that some sports halls are uncomfortably full at peak times'.

- 'Replacement of the Angel Centre with a new four-badminton court sized sports hall in the immediate vicinity is supported by the FPM findings, ostensibly because it improves the quality of the public leisure centre offer in the area of highest demand'.

- 'The scale of nearly all the sports halls in the Borough provides for all sports hall sports at the community participation level and most are also suitable for club development. The educational sector is the dominant provider'.

- 'There is scope to increase the availability for community use at educational sites. This is not required Borough-wide but at sites in areas of high demand, notably in Tonbridge. This will achieve a better balance between supply and demand'.

- 'The stock is ageing and there is an increasing need for modernisation in order to improve the quality of the offer'.

5.14 The balance between sports hall supply and demand

Four criteria have been assessed to evaluate the balance between sports hall supply and demand in Tonbridge and Malling:

- ***Quantity:*** Are there enough facilities with sufficient capacity to meet needs now and in the future?

- ***Quality:*** Are the facilities fit for purpose for the users now and in the future?

- ***Accessibility:*** Are the facilities in the right physical location for the users now and in the future?

- ***Availability:*** Are the facilities available for those who want to use them now and in the future?

5.15 Quantity

5.15.1 Current needs

Current sports halls in Tonbridge and Malling are assessed collectively to be operating at well within 'comfortable capacity', based upon the following evaluation:

- ***Used peak capacity:*** Average peak utilisation rates for sports halls in Tonbridge and Malling are 51%, well below Sport England's 'comfortable capacity' figure of 80%, although used capacity at the six existing sports halls in the north of the borough averages 75%.

- ***Supply-demand balance:*** Sport England's Facilities Planning Model concludes that Tonbridge and Malling's supply of sports halls can meet the current and future demand for sports halls. This assessment is predicated on retaining or replacing the capacity provided by the Angel Centre in the Tonbridge sub-area.

- ***Location of unmet demand:*** The distribution of demand and the hours that sports halls are available for community use, especially in the areas of highest demand, mean that some sports halls are uncomfortably full at peak times. There is scope to increase the availability for community use at educational sites in areas of high demand, notably in Tonbridge.

5.15.2 Future needs

The quantity of sports halls required to meet future needs has been assessed as follows:

- ***Population increases:*** Two population scenarios are considered:

- The ONS 2018 sub-national population projections forecast a population of 153,604 by 2042, an increase of 21,404 (or 16.2%). Based upon this, the SFC calculates additional demand equivalent to 6.08 badminton courts, which equates to the equivalent of 1.52 four-badminton court sized sports halls with full community access.

- A projection based on assessed housing needs predicts a population of 168,864 by 2042, an increase of 54,141 or 41.0%. Based upon this, the SFC calculates additional demand equivalent to 15.39 badminton courts, which equates to the equivalent to 3.85 four-badminton court sized sports halls with full community access.

- ***Participation trends:*** Based on national and local sports participation trends, for the purposes of forecasting future demand the likeliest scenario is for participation rates to remain at their current levels.

- ***Additional needs:***

  - Based upon a population increase of 21,404 people (or 16.2%) in the borough by 2042 and sports participation rates remaining at current levels, Sport England's Sport Facility Calculator projects demand for an additional 6.08 badminton courts, which is equivalent to 1.52 four-badminton court sized sports halls with full community access. This can be accommodated by spare capacity in existing facilities within 20-minute's drivetime.

  - Based upon a population increase of 54,141 people or (41.0%) in the borough by 2042 and sports participation rates remaining at current levels, Sport England's Sport Facility Calculator projects demand for an additional 15.39 badminton courts (equivalent to 3.85 four-badminton court sized sports halls with full community access). This can be accommodated by spare capacity in existing facilities within 20-minute's drivetime.

5.16 Quality

5.16.1 Current quality

The most critical issue with regards to sports hall in Tonbridge and Malling is the future of the Angel Centre and its role in town centre regeneration. This is considered in section 5.19. The position at other facilities should be kept under review.

5.16.2 Future quality

By 2042, the Angel Centre and Larkfield Leisure Centre will both be in need of refurbishment.

5.17 Accessibility

5.17.1 Current accessibility

The whole of the borough is within 20 minutes driving time of at least one sports hall, although per capita levels of sports hall provision vary substantially between the two sub-areas of the borough, with levels in the Tonbridge sub-area being double those in the Mallings sub-area.

5.17.2 Future accessibility

To ensure that there is adequate accessibility to sports halls in the future, the existing network of facilities should be maintained.

5.18 Availability

5.18.1 Current availability

Eleven of the 14 sports halls in the borough with community access do not have secured use.

5.18.2 Future availability

Ensuring that formal Community Use Agreements are in place at all education facilities in the borough would help to secure public access at evenings, weekends and in school holidays in the future.

5.19 The Angel Centre

5.19.1 Introduction

Tonbridge and Malling Borough Council is currently considering options for the reprovision of facilities currently provided at the Angel Centre in Tonbridge. This is in the wider context of regeneration proposals for the town centre. The facility is run by the council's appointed leisure contractor TMActive under a contract/lease that runs until October 2033. The facility was built in 1982, has a sub-optimal layout and requires major refurbishment, in particular:

- The boilers need replacing.
- The centre is not watertight.
- The drains are in poor condition.
- The Medway Hall floor is in poor condition.

No structural or condition surveys have been carried out, but it is estimated that around £2 million of work is required on mechanical and electrical services and structural repairs. This expenditure would be remedial and would not expand the range of leisure opportunities available to customers.

5.19.2 Current usage

The sports hall at the Angel Centre is currently used to 47% of capacity in the peak period. The facility accommodates a varied programme of use:

- The hall is the only sports hall in Tonbridge that is available on a 'pay-and-play' basis, including some organised sessions for Badminton, Short Tennis, Short Mat Bowls, Table Tennis, Volleyball, Walking Football and Walking Netball.
- TMActive runs courses for gymnastics, trampolining and badminton as well as junior holiday courses.

- The programme at the Angel Centre includes other health and social programmes including a GP referrals scheme, community health activities, a dementia café and Special Educational Needs activities.

- A number of sports clubs are based at the facility including:

Club	*Usage*
Angel Centre Badminton Club	The Club plays its league matches at the Angel Centre, with a club night at Judd School.
Ice Blackbelt Schools	Ice Blackbelt Schools hold martial arts sessions at the Angel Centre on Tuesday and Thursday evenings.
Karate Club	Sessions operate on Monday evenings.
Rugby Tots at the Angel Centre	Rugby Tots runs weekly play sessions for 2 - 7 years olds' on Saturday mornings at the Angel Centre.
Sevenoaks Trampoline Club	The Club holds sessions at the Angel Centre on Tuesday evenings.
Synergy Martial Arts Club	Synergy offers taekwondo and kick boxing sessions for children from 3 years to adults on Wednesday and Sunday evenings at the Angel Centre.
Tonbridge Volleyball Club	The Club plays in the National and Kent Leagues.

The six-badminton court-sized sports hall provides some booking flexibility, allowing two sets of activities to be accommodated simultaneously in some instances.

5.19.3 Stakeholder consultation

Consultation with TMActive has identified a number of usage trends at the Centre:

- The use of more free weights in gyms is growing in popularity, along with spinning and group exercise classes.

- Demand for badminton is falling and there is limited demand for basketball.

Respondents to the sports clubs' survey made the following observations in relation to the Angel Centre:

- ***Synergy Martial Arts Club:*** 'Unfortunately, due to the state of limbo surrounding the Angel Centre site, no investment has really been made to upgrade the facilities. When regular users like myself (22yrs) are trying to run a club out of these facilities, increasing the costs and not offering an improved service is very frustrating especially post Covid where the leisure industry has suffered anyway. Using the local leisure centre is always the preferred choice but nothing is really done to support or promote our club within the facility. Something needs to be done and soon before clubs look for alternative venues to house their clubs'.

- ***Tonbridge Volleyball Club:*** 'There has been an explosion in the demand for junior volleyball. We have a junior waiting list of over 30 (of up to two years) and there is also demand from adult beginners. We have invested significantly in coaching courses - with the help of KCC Bursaries - but having available, qualified coaches is still our constraining factor. Once we can resolve this, we would require more court time at the Angel Centre'.

5.19.4 Meeting the needs served by the Angel Centre

At a meeting of the council's Cabinet in December 2023, consideration was given to the future of the Angel Centre building. Due regard was given to the operational, building fabric and climate change considerations, together with the views expressed by the Leisure Trust and the council's Scrutiny Select Committee. The financial implications and advantages and disadvantages of both refurbishment and new facility options were also considered.

Members recognised that, due to the age, design and changing nature of leisure provision, the Angel Centre was no longer fit for purpose without significant investment in both plant and equipment. In addition, substantial investment would be required to reduce the carbon footprint of the building to achieve the council's carbon neutral aspirations for its leisure facilities.

It was resolved that the Angel Centre be demolished, and replacement leisure facilities be provided in Tonbridge. It was subsequently confirmed at the April 2024 Cabinet meeting, that the location of the replacement facility would be the adjacent Sovereign Way Mid car park.

5.19.5 Facilities Planning Model assessment

Sport England's Facilities Planning Model generated the following findings in relation to the Angel Centre, which helped to inform the decision on the location and scale of sports hall provision:

- 'Replacement of the Angel Centre with a new four-badminton court sized sports hall in the immediate vicinity is supported by the FPM findings, ostensibly because it improves the quality of the public leisure centre offer in the area of highest demand'.

- 'The new Angel Centre is modelled to be 100% full at peak times by 2041. Therefore, should the scale of New Angel Centre be increased from a four-court hall to a six-court hall, to accommodate more demand and reduce utilisation to a comfortable level? This is not supported for three reasons:

    - There are seven other sports halls sites in the Tonbridge area with scope to increase access for community use, therefore, making better use of what already exists.

    - Increasing the scale of New Angel Centre will increase its attractiveness because it can then support multiple sports use at the same time. However, if the other sites nearby are not modernised, the New Angel Centre will remain comparatively more attractive, and its used capacity is likely to remain at 100%.

    - The Borough already has a six-badminton court hall at Larkfield Leisure Centre (modernised in 2017) which can accommodate multiple sports use and provides an events centre. Albeit this centre is in Mallings sub-area and not the Tonbridge sub-area but is in an area of high demand that has significant residential development'.

5.20 Contribution to shared strategic outcomes

Based upon the assessment above, the extent to which sports halls provision in Tonbridge and Malling contribute to the shared strategic outcomes is as follows:

- Sports halls are flexible indoor facilities that can accommodate a range of sports and physical activities that are likely to appeal to existing and potential participants.

- The high utilisation rates at existing sports halls preclude the introduction of opportunities to accommodate additional need and demand from current non-participants.

- The lack of access to school sports halls does not make best use of available facility resources to deliver wider programmes of community activity.

5.21 The options for securing additional sports hall capacity

The options for securing sports hall capacity to meet current and future needs are as follows:

5.21.1 Protect

Local/Neighbourhood Plan policies for the protection of sports halls will be key both to securing local provision by ensuring that planning policy supports the retention of existing sports halls for which existing and/or future demand has been identified, including any without current community access, unless the loss of a facility would involve its replacement with a facility of at least the equivalent size, quality and accessibility.

5.21.2 Provide

No additional facilities are required to meet projected increases in demand from population growth. This demand can be absorbed in existing facilities within 20-minute's drivetime. However, it will be important to ensure that sports hall capacity in Tonbridge is maintained by providing a new four-badminton court sized sports hall as part of the new Angel Centre.

5.21.3 Enhance

Enhancing existing sports hall capacity by:

- Encouraging schools to extend the availability of their facilities to external users. Based upon the FPM assessment, the key schools to approach in this regard are High Christie School, the Holmesdale School, Weald of Kent Grammar School and Wrotham School.

- Supporting schools to improve their management of community use arrangements, to improve community access to sports halls.

- Securing formal Community Use Agreements at existing and proposed future facilities on school sites, to enhance community accessibility.

5.22 Action Plan

5.22.1 Introduction

The tables below set out the action plan for sports halls to guide the implementation of the Assessment. Cost estimates reflect Sport England's *'Facility Costs - Third Quarter of 2024'* (2024).

5.22.2 Key strategic actions

Issues	*Action*	*Lead*	*Partners*	*Resources*	*Priority*
Protection of existing sports halls	Consider including a policy in the Local Plan to protect all existing sports halls.	TMBC	Sport England/ Active Kent and Medway	Planning Policy	High
Community access to sports halls	Pursue formal Community Use agreements at all existing and any future proposed sports halls on education sites.	TMBC	Secondary academies and schools	Funding for improvements to allow out of hours access.	High
Funding for future sports hall needs	Ensure that provision is made to secure developer contributions towards new and improved facilities.	TMBC	Sport England/ Active Kent and Medway	Planning Development Management	High

5.22.3 Site-specific actions

Site	*Issues*	*Action*	*Lead*	*Partners*	*Resources*	*Priority*
Angel Centre	• Need to maintain sports hall provision. • Current facilities are not fit for purpose.	Re-provide a 4-badminton court sports hall in Tonbridge	TMBC	TM Active	TBC	High
Aylesford School	No formal Community Use Agreement.	Pursue a formal Community Use Agreement	Aylesford School	TMBC	-	Medium
David Lloyd (Kings Hill)	No current issues.	No action required.	David Lloyd Leisure	-	-	-
Homesdale School	No formal Community Use Agreement.	Pursue a formal Community Use Agreement	Homesdale School	TMBC	-	High
Hugh Christie School	No formal Community Use Agreement.	Pursue a formal Community Use Agreement	Hugh Christie School	TMBC	-	High
Judd School	No formal Community Use Agreement.	Pursue a formal Community Use Agreement	Judd School	TMBC	-	Medium
Larkfield Leisure Centre	No current issues.	No action required.	TMBC	TM Active	-	-
Leigh Academy Tonbridge	No formal Community Use Agreement.	Pursue a formal Community Use Agreement	Leigh Academy	TMBC	-	Medium
Malling School	No formal Community Use Agreement.	Pursue a formal Community Use Agreement	Malling School	TMBC	-	Medium
Sackville School	No formal Community Use Agreement.	Pursue a formal Community Use Agreement	Sackville School	TMBC	-	Medium
Tonbridge Gram. School	No formal Community Use Agreement.	Pursue a formal Community Use Agreement	Tonbridge Gram. School	TMBC	-	Medium
Tonbridge School	No formal Community Use Agreement.	Pursue a formal Community Use Agreement	Tonbridge School	TMBC	-	Medium
Weald of Kent Gram. School	No formal Community Use Agreement.	Pursue a formal Community Use Agreement	Weald of Kent Gram. School	TMBC	-	High
Wrotham School	No formal Community Use Agreement.	Pursue a formal Community Use Agreement	Wrotham School	TMBC	-	High

6 SWIMMING POOLS

6.1 Introduction

This section examines the provision of swimming pools in Tonbridge and Malling. For the purposes of this assessment, swimming pools are defined as indoor facilities with minimum pool length of 20 metres, although smaller teaching and diving pools are included in the assessment where they are integral to a facility with a main pool.

6.2 Quantity

6.2.1 Indoor swimming pools with community use

The swimming pools with community use in Tonbridge and Malling are as follows:

Facility	*Address*	*Dimensions*	*Year built*	*Sub-area*
David Lloyd (Kings Hill)	King's Hill Avenue, West Malling ME19 4UA	25m x 10m	2005	Mallings
Larkfield Leisure Centre	New Hythe Lane, Aylesford ME20 6RH	25m x 15m 25m x 14m 10m x 7.5m	1992	Mallings
Nizel's Golf and Country Club	Nizel's Lane, Hildenborough TN11 8NU	25m x 10m	2000	Tonbridge
Tonbridge School	London Road, Tonbridge TN10 3AD	25m x 12.5m	2008	Tonbridge
Tonbridge Swimming Pool	The Slade, Tonbridge TN9 1HR	25m x 13m 13m x 7m	1996	Tonbridge

6.2.2 Smaller indoor swimming pools with community use

The smaller swimming pools with community use in Tonbridge and Malling are as follows:

Facility	*Address*	*Dimensions*	*Year built*	*Sub-area*
Carroty Wood Adventure Centre	Higham Lane, Tonbridge TN11 9QX	17.5m x 7.5m	1997	Tonbridge
Reynolds Retreat	Quarry Hill Road, Borough Green TN15 8RQ	16m x 8m	2014	Mallings
Spirit Health Club	London Road, Wrotham Heath TN15 7RS	15m x 10m	1984	Mallings

6.2.3 Swimming pools with no community use

There are no swimming pools that do not have community use.

6.2.4 Sub-area analysis

The distribution of full-sized swimming pools with community use by sub-area in Tonbridge and Malling is as follows:

Sub-area	*Sub-area population 2021*	*No. pool sites*	*Pools per capita*	*Pool space per 1,000 people*
Tonbridge and surrounds	56,018	3	1: 18,673	17.47sq.m
Mallings and surrounds	76,182	2	1: 38,091	13.78sq.m
TONBRIDGE & MALLING	***132,200***	***5***	***1: 26,440***	***15.34sq.m***

6.3 Quality

6.3.1 The criteria assessed

The quality of swimming pools was assessed by a non-technical visual inspection during a site visit to all facilities. The criteria that were evaluated were as follows:

- ***Pool area(s):*** The overall condition, lighting, aquatic activities provided for, temperature, spectator provision and fitness for purpose.
- ***Changing facilities:*** Capacity, condition and fitness for purpose.
- ***Disability access:*** Provision for disabled access throughout the facility.
- ***Maintenance and cleanliness:*** The quality of maintenance and cleanliness standards.
- ***General access:*** Car parking, lighting, signposting and proximity to public transport.

6.3.2 The basis of the ratings

The facilities were rated on a five-point scale, where 5 equates to 'very good' (highlighted in green below), 4 to 'good' (also highlighted in green below), 3 to 'average' (highlighted in yellow below), 2 to 'poor' and 1 to 'very poor'.

Facility	*Pool area*	*Changing*	*Disability Access*	*Maintenance*	*General access*
David Lloyd (Kings Hill)	5	5	4	5	5
Larkfield Leisure Centre	5	4	4	5	5
Nizel's Golf and Country Club	5	4	3	5	3
Tonbridge School	5	4	4	5	5
Tonbridge Swimming Pool	4	4	3	4	5

6.4 Accessibility

Based on Sport England research, the 'effective catchment' for indoor swimming pools (the time/distance travelled by up to 90% of facility users and the prevailing mode of transport used) is 20 minutes' drive time. As shown by the whole population is within 20-minutes' drive time of a pool.



6.5 Availability

The table below identifies the opening hours, usage arrangements, pricing and used capacity in the peak periods.

Facility	*Opening hours and basis of use*	*Pricing*	*Peak usage*	*Secured access*
David Lloyd (Kings Hill)	Mon-Fri 6am - 11pm Sat-Sun 7am - 10pm Members only	Basic Membership £94.50 per month	48%	Yes
Larkfield Leisure Centre	Mon-Fri 6.30am - 10pm Sat-Sun 6.30am - 8pm Casual use/clubs/schools/ swimming lessons	Priority Card: Adult £6.80 Concession £5.50 Casual User: Adult £9.70 Concession £7.20	55%	Yes
Nizel's Golf and Country Club	Mon-Fri 6.30am - 10pm Sat-Sun 7am - 9pm Members only	Basic Membership £94.50 per month	19%	Yes
Tonbridge School	Mon-Fri 6am - 9pm Sat 8am - 9pm Sun 9am - 7.30pm Members only	Membership £69 per month Bookings on-line.	75%	Yes
Tonbridge Swimming Pool	Mon-Fri 6.30am - 10pm Sat-Sun 6.30am - 8pm Casual use/clubs/schools/ swimming lessons	Priority Card: Adult £6.80 Concession £5.50 Casual User: Adult £9.70 Concession £7.20	64%	Yes

6.6 Key findings on supply

The key findings are as follows:

- There are five community accessible facilities with swimming pools in Tonbridge and Malling, all of which have secured community use.
- All aspects of the quality of all facilities are 'average' or better.
- The whole population of the borough is within 20-minutes' drive time of a pool. However, not all pool facilities cater for all users. Swimming clubs are only able to access public provision and Tonbridge School due to the lower cost of access and flexibility provided by these operators to accommodate competitive swimming but not county level galas.
- Sport England recognises a measure of 'comfortable capacity', where a swimming pool is regarded as effectively fully utilised when peak usage levels reach 70%. Tonbridge School pool is currently used to just above the 'comfortable capacity' figure but the collective figure for the borough is 53%.

6.7 Current demand for swimming pools

6.7.1 Expressed demand

Expressed demand for swimming pools in Tonbridge and Malling is as follows:

Facility	*% Peak utilisation*
David Lloyd (Kings Hill)	48%
Larkfield Leisure Centre	55%
Nizel's Golf and Country Club	19%
Tonbridge School	75%
Tonbridge Swimming Pool	64%

6.7.2 Displaced demand

Displaced demand relates to swimming from within the study area which takes place outside of the area. The following community-accessible pool in neighbouring areas is close enough to the borough boundary to provide usage opportunities for Tonbridge and Malling residents.

Facility	*Address*	*Distance from Tonbridge and Malling*
Lockmeadow Health Club	Barker Road, Maidstone ME16 8LW	2 miles
Maidstone Leisure Centre	Mote Park, Maidstone ME15 8NQ	3 miles
Sevenoaks Leisure Centre	Buckhurst Lane, Sevenoaks TN13 1LW	3 miles
Sennocke Centre	High Street, Sevenoaks TN13 1HU	3 miles
Sir Joseph Williamson's School	Maidstone Road, Rochester ME1 3EL	1 mile
Strood Sports Centre	Watling Road, Strood ME2 3JQ	2 miles
Tunbridge Wells Sports Centre	St. Johns Road, Tunbridge Wells TN4 9TX	2 miles
Village Gym (Maidstone)	Forstal Road, Maidstone ME14 3AQ	1 mile

6.7.3 Unmet demand

Tonbridge Swimming Club uses Tonbridge Swimming Pool and made the following comments:

- 'We are desperately short of pool time to train and teach - constantly turning potential members away. The pool we use is unsuitable for us to host competitions (other than our own internal galas) due to limited space, no electronic timing equipment etc. which is required for basic competitions'.

- 'We also hire the pool at Tonbridge School for four hours per week, along with several pools outside of the borough, at Tunbridge Wells Sports Centre for two hours per week, Radnor House School (Sevenoaks) for three hours per week and Wally Hall School (Sevenoaks) for six hours per week.

- 'We are granted pool hire when TMActive can allow it but almost entirely at times too late for most of the children (e.g. ending at 10pm)'.

- 'It does seem there is shortage of pool space and even though we serve the community with young and old, able bodied and Para swimmers needing to swim, we simply cannot get pool time to suit'.

Larkfield Swimming Club trains at Larkfield Leisure Centre on four evenings per week but has to use the pool at Sir Joseph Williamson's Mathematical School in Maidstone for its Sunday evening training session.

6.8 Assessments of need in neighbouring areas

The table below summarises strategic assessments of swimming pool needs in neighbouring areas.

Local Authority	Facilities priorities	Implications for Tonbridge and Malling
Maidstone Borough Council	The *'Maidstone Sports Facilities Strategy'* (2019) states that 'there are nine swimming pools at five sites with community use in Maidstone which comply with the minimum dimensions, plus four smaller pools. Four of the five swimming pool sites in Maidstone are used to above 'comfortable capacity' at peak times. Additional demand by 2031 will amount to the equivalent of one 25m x 4-lane pool with full community access'.	There is no spare capacity to serve demand from Tonbridge and Malling.
Tunbridge Wells Borough Council	The *Tunbridge Wells Borough Indoor/Built Sports Facilities Needs Assessment 2017-2033'* (2018) concludes that there is sufficient capacity to meet current needs, but that demand equivalent to one 25m x 4-lane pool will need to be accommodated by 2033.	Tunbridge Wells Leisure Centre has potential spare capacity to accommodate some demand from Tonbridge and Malling.
Sevenoaks District Council	The *'Sevenoaks Sports Facilities Strategy 2016-2025'* (2017) identifies that 'there is a current oversupply of community accessible water space in the district of around 649.7sq.m. However, this includes a significant proportion currently only available for sports clubs/community associations rather than general pay-and-play. Taking account of future demand, the over-supply reduces to 459.5sq.m. Much of the supply is at sites without a formal community use agreement in place. There is significant unused capacity in all pools in the district, except White Oak Leisure Centre'.	Three facilities in the district have catchments that overlap Tonbridge and Malling, so there is potential to accommodate some demand from the borough using spare capacity.
Gravesham Borough Council	The *'Gravesham Indoor Sports Facilities Strategy and Action Plan 2016-2026'* (2016) identified 'a shortfall in supply which is the equivalent of a six-lane 25m pool'.	There is no spare capacity to meet demand from Tonbridge and Malling.
Medway Council	The *'Medway Sports Facilities Strategy and Action Plan'* (2017) concludes that 'a significant shortfall of 544sq.m of water space identified. This is equivalent to an area of approximately 11 x 25m lanes of swimming pool water. Need will increase further with the expected 20% growth in population in the next 20 years'.	There is no spare capacity to meet demand from Tonbridge and Malling.

6.9 Sport-specific priorities

Facilities priorities	Implications for Tonbridge and Malling
Swim England's *'Towards a Nation Swimming: A Strategic Plan for Swimming in England 2017 - 2021'* (2017) includes a commitment to 'working with providers to create a swimming environment that is more inclusive and exceeds the expectations of swimmers'.	No specific local facilities priorities in Tonbridge and Malling.

Consultation with Swim England's Facilities Officer identified the following issues:

- 'The Borough as a whole shows its water provision to be adequate at this current time with a significant surplus of 1,284m² accessible to the public equating to four 6-lane 25m pools'.

- 'Two of the pools are lidos (David Lloyd and Tonbridge Swimming Pool) and therefore are subject to seasonal operating. During periods where these pools might be closed the surplus across the borough reduces to 824m²'.

- 'One site (the 15m pool at Spirit Health Club in Wrotham) is approaching and two sites are within 10-years, of the critical lifecycle point (38 years), with no refurbishment undertaken. The most significant being Tonbridge Swimming Pool which provides 416m² of water space in the borough'.

- 'A number of sites have undergone refurbishment work between 2003 and 2005 and therefore although originally built in the 1990's the lifespans have been extended'.

- 'There is a mixture of Local Authority, Education and Commercial facilities with differing access policies including pay-and-play, membership and club or other organised group use, therefore pricing and usage capacity should be considered when assessing how accessible the water space is for the community'.

Swim England made the following recommendations:

- 'Future water provision should look to have open public access, ensuring water space remains accessible to local population'.

- 'With the borough showing a surplus of water space no immediate action is recommended to provide additional facilities' but any strategic review should consider provision beyond 10 years and the impact of a growing population and aging facility stock.

- 'The facility mix in the future needs to consider the versatility of its water space with options for moveable floors/booms offering greater flexibility in programming'.

- 'Condition surveys are recommended to be carried out/updated on the identified sites within 10-years of the critical life point to assess the need for future investment in refurbishment works or new facilities'.

6.10 Future demand for swimming pools

6.10.1 Population growth

Two scenarios are considered:

- The ONS 2018 sub-national population projections forecast a population of 153,604 by 2042, an increase of 21,404 (or 16.2%).

- Objectively assessed Local Housing Need (LHN) amounts 1,090 dwellings per year (23,544 dwellings by 2042). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 54,151 to 186,351 or 41.0%.

6.10.2 Participation rates

One factor in considering future sports participation rates is to track historical trends, as a guide to possible future developments. The most recent covid-affected figures have been excluded as anomalous.

- ***National trends:*** Sport England's *'Active Lives'* survey has recorded adult (16+) weekly participation rates for swimming at national level since 2015:

Nov 2015-Nov 2016	*May 2016-May 2017*	*Nov 2016-Nov 2017*	*May 2017-May 2018*	*Nov 2017-Nov 2018*	*May 2018-May 2019*	*Nov 2018-Nov 2019*	*May 2019-May 2020*	*% Change*
11.0%	10.8%	10.2%	10.0%	10.5%	10.4%	9.3%	8.9%	-2.1%

- ***Local trends:*** Sport England's *'Active Lives'* survey recorded the proportion of the adult (16+) population who are active for at least 150 minutes per week in Tonbridge and Malling between 2015 and the present. The results are tabulated below and show that whilst rates have fluctuated over the survey periods, there is a downward trend between 2015 and 2022:

Nov '15 - Nov '16	*May '16 - May '17*	*Nov '16-Nov '17*	*May '17-May '18*	*Nov '17-Nov '18*	*May '18-May '19*	*Nov '18-Nov '19*	*May '19-May '20*	*Nov '19-Nov '20*	*May '20-May '21*	*Nov '20-Nov '21*	*Nov '21-Nov '22*	*% Change*
66.3%	66.9%	66.8%	67.4%	68.8%	69.5%	69.4%	66.0%	66.0%	66.6%	65.1%	64.2%	-2.5%

6.10.3 Future projections

Sport England has developed the Sport Facility Calculator (SFC), to help to quantify how much additional demand for key community facilities like swimming pools, will be generated by population increases. The SFC uses Sport England survey data on who uses facilities and applies this to the population profile of the local area. This builds up a profile of usage, which can be then applied to estimate how much demand any given population would generate. For the purposes of projecting future demand in Tonbridge and Malling current participation rates have been assumed since there have been no statistically significant increases since 2015, either locally in the borough or for swimming. Two population scenarios are considered:

- The ONS 2018 sub-national population projections forecast a population of 153,604 by 2042, an increase of 21,404 (or 16.2%). Based upon this, the SFC calculates demand for an additional 234.62sq.m of water space, which is equivalent to 4.41 of 25m pool lanes or 1.11 four-lane 25m pools with full community access.

- A projection based on assessed housing needs predicts a population of 186,351 by 2042, an increase of 54,242 or 41.0%. Based upon this, the SFC calculates demand for an additional 593.64sq.m of water space, which is equivalent to 11.18 25m pool lanes or 2.79 four-lane 25m pools with full community access.

6.11 Key findings on demand

The key findings are as follows:

- Sport England recognises a measure of 'comfortable capacity', where a swimming pool is regarded as effectively fully utilised when peak usage levels reach 70%. Tonbridge School pool is currently used to just above the 'comfortable capacity' figure but the collective figure for the borough is 53%.

- Notwithstanding this, Tonbridge Swimming Club stated that 'it does seem there is shortage of pool space and even though we serve the community with young and old, able bodied and Para swimmers needing to swim, we simply cannot get pool time to suit'. In addition, Larkfield Swimming Club has to use a pool in Maidstone for some of its training needs.

- Sport England's Sport Facility Calculator projects future demand for an additional swimming pool space equivalent to around one four-lane 25m pool based on the lower population projection and equivalent to around three four-lane 25m pools based on the higher population projection.

6.12 Facilities Planning Model Assessment

6.12.1 Introduction

To supplement and complement the strategic assessment, TMBC commissioned an additional assessment of swimming pool needs using the Sport England Facilities Planning Model (FPM) spatial modelling tool. The FPM study is a quantitative, accessibility and spatial assessment of the supply, demand and access to sports halls and swimming pools in the borough. It included two modelling 'runs':

- A baseline assessment of provision in 2023.

- A forward assessment of demand for swimming pools and their distribution, based on the projected changes in population including residential development between 2023 and 2041.

6.12.2 Key findings

- ***Quantity:*** The total capacity of swimming pools in 2023 and 2041 is estimated as 16,501 visits in the weekly peak period. The pools at the two leisure centres cater for all types of swimming activities and collectively provide 64% of the Borough's available swimming pool capacity in the weekly peak period.

- ***Quality:*** No new swimming pools have been built in the Borough in the last 15 years. Only two of the five swimming pool sites have been modernised, and the most recent refurbishment was of Nizel's Golf and Country Club in 2005. Therefore, the stock of swimming pools is ageing.

- ***Used peak capacity:*** In 2023 the overall estimated used capacity of swimming pools in the weekly peak period is 53%. In 2041 this is projected to rise to 64% due to the increase in demand arising from 27% population growth. Only the Tonbridge School pool is used to above comfortable capacity in 2023 (at 75%), but by 2041 the Tonbridge School pool will be at 100% capacity in the peak periods and Tonbridge Swimming Pool at 83% capacity.

- ***Expressed demand:*** Demand for swimming pools is greatest in the Tonbridge area, where Tonbridge Swimming Pool and Tonbridge School Centre are located.

- ***Satisfied demand:*** A very high proportion of Tonbridge and Malling's demand is met, at 94% in 2023 and 93% in 2041. The proportion decreases because of the large increase in total demand. The number of visits met in the weekly peak period increases from 8,497 in 2023 to 10,400 in 2041.

- ***Unmet demand:*** Unmet demand is 6% of demand in 2023, and 7% in 2041, increasing from 93 sqm to 119 sqm of water due to greater demand. Nearly all the unmet demand is demand that is located too far from a facility and is not due to a lack of swimming pool capacity. The location where most unmet demand can be met is Blue Bell Hill, at 113 sqm of water in 2041. This is at Junction 3 of the M2 and will include demand from Medway and Maidstone, as well as from Tonbridge and Malling. It is an insufficient total to consider provision of a swimming pool at this location.

- ***Displaced demand:*** Tonbridge and Malling is a small net importer of swimming demand. In 2023, 24% of Tonbridge and Malling's satisfied demand is met at swimming pools in neighbouring local authority areas, principally Maidstone, but imported demand amounts to 27% of the total. 38% of imported visits come from Tunbridge Wells, 27% from Maidstone, 16% from Sevenoaks, 14% from Medway and 5% from Gravesham.

- In 2041 exported demand is 23% of the Borough's met demand and imported demand will be 23%.

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6.12.3 Conclusions

The conclusions from the FPM runs are as follows:

- 'The headline strategic finding is that the current and future demand for swimming pools can be met by the available supply. While Tonbridge and Malling has a small number of sites, it has an extensive supply in terms of water space. The population and demand for swimming pools both increase significantly to 2041'.

- 'There is no requirement to increase the swimming pool provision to meet the projected future demand'.

- 'A very high level of the Borough's demand for swimming pools can be met in 2023 and 2041. Unmet demand is low and almost all is demand that is located too far from a facility. Most pools have spare capacity at peak times, but the distribution of demand means that the Tonbridge School pool is uncomfortably full at peak times. There is scope to increase the hours for community use at Tonbridge School and reduce the used capacity of the pool at peak times'.

- 'The stock is ageing and while two of the five sites have been modernised, there is an increasing need for modernisation at the others. Neither pool in Tonbridge has been modernised and demand for swimming is highest in Tonbridge both currently and in the future. The quality of the swimming offer will decrease as the pool sites age'.

6.13 The balance between swimming pool supply and demand

Four criteria have been assessed to evaluate the balance between swimming pool supply and demand in Tonbridge and Malling:

- ***Quantity:*** Are there enough facilities with sufficient capacity to meet needs now and in the future?

- ***Quality:*** Are the facilities fit for purpose for the users now and in the future?

- ***Accessibility:*** Are the facilities in the right physical location for the users now and in the future?

- ***Availability:*** Are the facilities available for those who want to use them now and in the future?

6.14 Quantity

6.14.1 Current needs

Current swimming pools in Tonbridge and Malling are assessed to be operating with spare capacity based upon the following evaluation:

- ***Used peak capacity:*** In 2023 the overall estimated used capacity of swimming pools in the weekly peak period is 53%. In 2041 this is 64% due to the increase in demand arising from 27% population growth. Only the Tonbridge School pool is used to above 'comfortable capacity' in 2023 (at 75%).

- ***Unmet demand:*** Tonbridge Swimming Club stated that 'it does seem there is shortage of pool space and even though we serve the community with young and old, able bodied and Para swimmers needing to swim, we simply cannot get pool time to suit'. Larkfield Swimming Club trains at Larkfield Leisure Centre on four evenings per week but has to use the pool at Sir Joseph Williamson's Mathematical School in Maidstone for its Sunday evening training session.

6.14.2 Future needs

Additional pool space will be required to meet future needs.

- ***Population increases:*** Two scenarios are considered:

    - The ONS 2018 sub-national population projections forecast a population of 153,604 by 2042, an increase of 21,404 (or 16.2%).

    - A projection based on assessed housing needs predicts a population of 186,351 by 2042, an increase of 54,151 (or 41.0%).

- ***Participation trends:*** Based on national and local sports participation trends, for the purposes of forecasting future demand the likeliest scenario is for participation rates to remain at their current levels.

- ***Additional needs:*** Future population growth will bring additional demand for access to water space. This is calculated to be the equivalent of between 1.11 and 2.79 additional 25m pools. The lower figure can be accommodated by using spare capacity in existing facilities. The higher figure can be met by developing additional peak time spare capacity in existing facilities in Tonbridge through programming changes and extending community use periods at Tonbridge School.

6.15 Quality

6.15.1 Current quality

All aspects of the quality of most facilities are 'average' or better. However, no new swimming pools have been built in the Borough in the last 15 years. Only two of the five swimming pool sites have been modernised, and the most recent refurbishment was of Nizel's Golf and Country Club in 2005. Therefore, the stock of swimming pools is ageing.

6.15.2 Future quality

The Larkfield Leisure Centre and Tonbridge Swimming Pools were built in 1992 and 1996 respectively and it is likely that both will need major refurbishment or replacement before the end of the strategy period in 2042.

6.16 Accessibility

6.16.1 Current accessibility

All parts of the borough are within a 20-minute drivetime catchment of the nearest swimming pool.

6.16.2 Future accessibility

It has been assumed that the current accessibility of pools will remain for the duration of the strategy period to 2042.

6.17 Availability

6.17.1 Current availability

Current availability is good, with the two leisure centre pools available for casual swimming on a non-membership basis, as well as club and schools hire and swimming lessons. There is some unmet demand for use by swimming clubs.

6.17.2 Future availability

It has been assumed that the current availability of pools will remain for the duration of the strategy period to 2042.

6.18 Contribution to shared strategic outcomes

Based upon the assessment above, the extent to which swimming pools provision in Tonbridge and Malling contributes to the shared strategic outcomes is as follows:

- Swimming is an activity that appeals to a broad cross-section of the community, both residents and visitors to the borough.
- The utilisation rates at existing swimming pools have some capacity to accommodate additional need and demand from current non-participants.

6.19 The options for securing additional swimming pool capacity

The options for securing existing and additional swimming pool capacity to meet current and future needs are as follows:

6.19.1 Protect

Local Plan policies for the protection of swimming pools through the Local Plan will be key both to securing local provision by ensuring that planning policy supports the retention of existing facilities for which existing and/or future demand has been identified, unless the loss of a facility would involve its replacement with a facility of at least the equivalent size, quality and accessibility.

6.19.2 Provide

Larkfield Leisure Centre and Tonbridge Swimming Pools were built in 1992 and 1996 respectively and it is likely that both will need major refurbishment or replacement before the end of the strategy period in 2042.

6.19.3 Enhance

Enhancing existing swimming pool capacity by:

- Encouraging Tonbridge School to extend the peak period availability of its facilities to external users.
- Examining whether programming changes could accommodate more users in particular club swimmers at Tonbridge and Larkfield pools managed by TM Active.

6.20 Action Plan

6.20.1 Introduction

The tables below set out the action plan for swimming pools to guide the implementation of the Assessment.

6.20.2 Key strategic actions

Issues	*Action*	*Lead*	*Partners*	*Resources*	*Priority*
Protection of existing swimming pools	Consider including a policy in the Local Plan to protect all existing swimming pools.	Sport England Active Kent and Medway	Planning policy team	-	High
Funding for future swimming pool needs	Ensure that provision is made to secure developer contributions towards improved facilities.	Sport England, Active Kent and Medway Developers	Planning development management team	-	High

6.20.3 Site-specific actions

Site	*Issues*	*Action*	*Lead*	*Partners*	*Resources*	*Priority*
David Lloyd (Kings Hill)	No current issues.	No action required.	-	-	-	-
Larkfield Leisure Centre	No current issues.	No action required.	TMBC	-	-	-
Nizel's Golf and Country Club	No current issues.	No action required.	-	-	-	-
Tonbridge School	Limited community access	Discuss the possibility of extending community use	TMBC	Tonbridge School	-	Medium
Tonbridge Swimming Pool	Possibility of changing programming to include extra users	Review programme to accommodate extra demand	TMBC TM Active	-	-	High

7 HEALTH AND FITNESS

7.1 Introduction

This section examines health and fitness facilities in Tonbridge and Malling. Health and fitness facilities are defined as dedicated community accessible facilities with a range of exercise equipment.

7.2 Quantity

7.2.1 Health and fitness facilities with community use

The location and number of equipment stations at health and fitness facilities with community use in Tonbridge and Malling is as follows. All facilities have secured community access:

Site	*Address*	*Stations*	*Sub-area*
Angel Centre	Angel Lane, Tonbridge TN9 1SF	84	Tonbridge
David Lloyd (Kings Hill)	King's Hill Avenue, West Malling ME19 4UA	120	Mallings
Evolution Strength and Fitness	Mills Road, Aylesford ME20 7NA	35	Mallings
Hilden Health and Fitness Club	Rings Hill, Hilden TN11 8LX	40	Tonbridge
Infinity Fitness UK	Kings Hill Avenue, West Malling ME19 4AR	39	Mallings
K-Sports	Station Road, Aylesford ME20 2AU	30	Mallings
Larkfield Leisure Centre	New Hythe Lane, Aylesford ME20 6RH	75	Mallings
Nizel's Golf and Country Club	Nizel's Lane, Hildenborough TN11 8NU	72	Tonbridge
Puregym Tonbridge*	Avebury Avenue, Tonbridge TN9 1TF	220*	Tonbridge
Reynolds Retreat	Quarry Hill Road, Borough Green TN15 8RQ	50	Mallings
Snap Fitness (Tonbridge)	Morley Road, Tonbridge TN9 1RD	150	Tonbridge
Snodland Community Centre	Cemetery Road, Snodland ME6 5BF	14	Mallings
Spirit Health Club	London Road, Wrotham Heath TN15 7RS	23	Mallings
Tonbridge School	London Road, Tonbridge TN10 3AD	55	Tonbridge
TOTAL	**-**	***1,007***	**-**

* Closed since June 2021 following a flood.

7.2.2 Health and fitness facilities without community use

The location and number of equipment stations at smaller school-based health and fitness facilities with no community use in Tonbridge and Malling is as follows.

Site	*Address*	*Stations*	*Sub-area*
Hadlow College	Tonbridge Road, Hadlow TN11 0AL	8	Tonbridge
Hugh Christie School	White Cottage, Road, Tonbridge TN10 4PU	6	Tonbridge
Judd School	Brook Street, Tonbridge TN9 2PN	13	Tonbridge
The Homesdale School	Malling Road, Snodland ME6 5HS	8	Mallings
The Malling School	Beech Road, West Malling ME19 6DH	20	Mallings
TOTAL	**-**	***55***	**-**

7.2.3 Sub-area analysis

The distribution of fitness facilities by sub-area in Tonbridge and Malling is as follows.

Sub-area	*Sub-area population 2021*	*No. stations*	*Stations per capita*
Tonbridge and surrounds	56,018	621	1: 90
Mallings and surrounds	76,182	386	1: 197
TONBRIDGE & MALLING	***132,200***	***1,007***	***1: 131***

7.3 Quality

7.3.1 The criteria assessed

The quality of health and fitness facilities was assessed by a non-technical visual inspection during a site visit to all facilities. The criteria that were evaluated were as follows:

- ***Fitness facilities:*** The overall condition, mix of cardio-vascular and resistance equipment, lighting and ambience.
- ***Changing facilities:*** Capacity, condition and fitness for purpose.
- ***Disability access:*** Provision of disability-specific equipment and disabled access throughout.
- ***General access:*** Car parking, lighting, signposting and proximity to public transport.

7.3.2 The basis of the ratings

The facilities were rated on a five-point scale, where 5 equates to 'very good', 4 to 'good', 3 to 'average', 2 to 'poor' and 1 to 'very poor'.

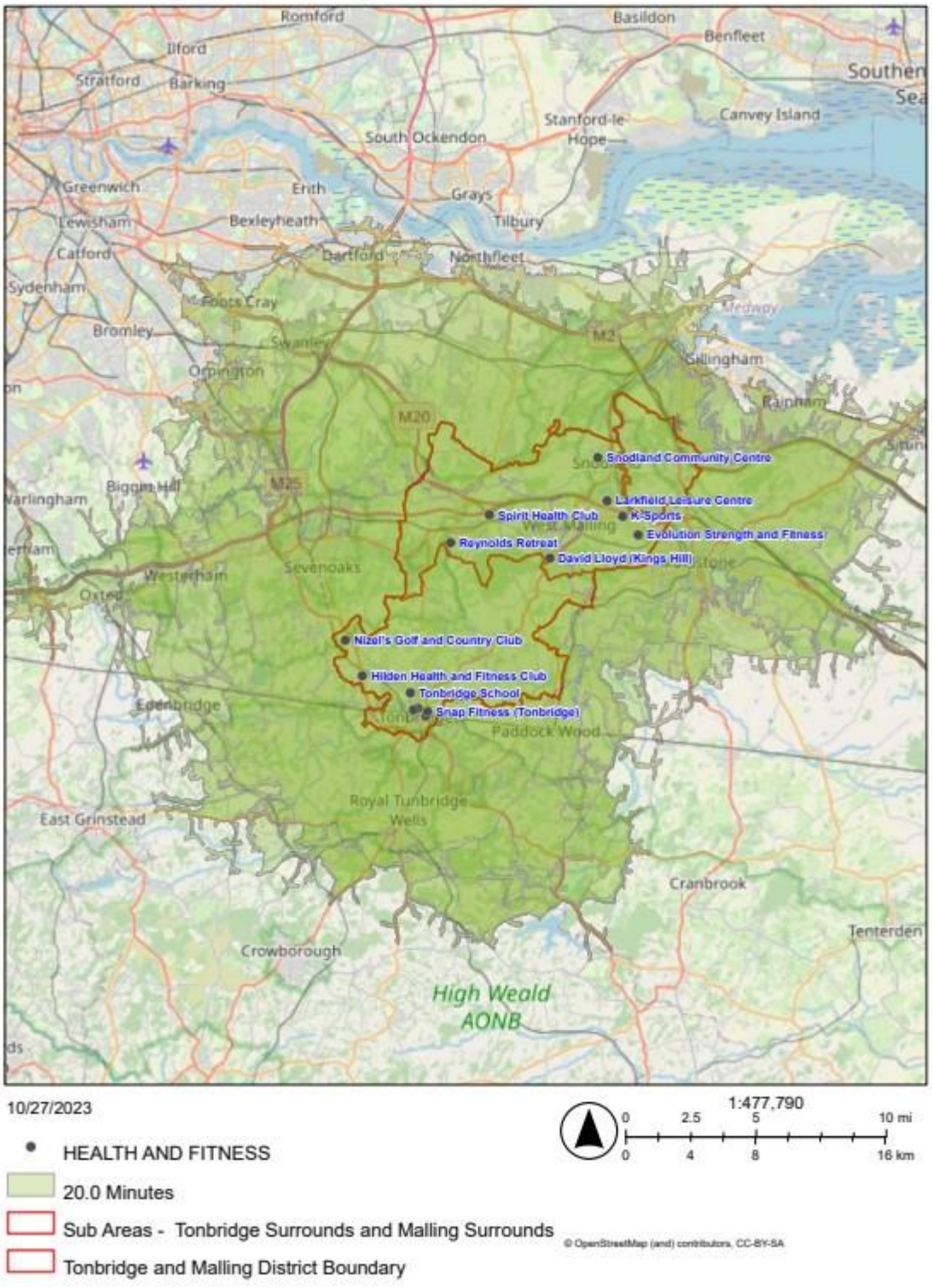
Facility	*Fitness facilities*	*Changing*	*Disability Access*	*General access*
Angel Centre	4	3	3	4
David Lloyd (Kings Hill)	5	5	4	5
Evolution Strength and Fitness	3	3	3	3
Hilden Health and Fitness Club	4	5	1	5
Infinity Fitness UK	5	5	4	5
K-Sports	3	2	1	3
Larkfield Leisure Centre	4	4	4	4
Nizel's Golf and Country Club	5	5	3	5
Puregym Tonbridge*	-	-	-	-
Reynolds Retreat	5	5	4	4
Snap Fitness (Tonbridge)	4	4	4	4
Snodland Community Centre	3	4	4	5
Spirit Health Club	3	3	2	3
Tonbridge School	4	3	3	4

* Currently closed for refurbishment - no assessment undertaken

7.4 Accessibility

Based on Sport England research, the 'effective catchment' for health and fitness facilities is 20 minutes driving time. The map overleaf shows that almost the whole population of the borough is within 20-minutes' drivetime of at least one health and fitness facility.

Tonbridge and Malling - Health & Fitness 20 Minutes Drive



10/27/2023

1:477,790

0 2.5 5 10 mi

0 4 8 16 km

HEALTH AND FITNESS

20.0 Minutes

Sub Areas - Tonbridge Surrounds and Malling Surrounds

Tonbridge and Malling District Boundary

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7.5 Availability

The table below identifies the opening hours, usage arrangements and pricing (shown as monthly direct debit costs to facilitate comparison).

Facility	*Opening hours and basis of use*	*Pricing*
Angel Centre	Mon-Thurs 6.30am - 9.30pm Fri 6.30am - 9pm Sat-Sun 8am - 7pm Membership and 'pay-and-play'	Health & Fitness Membership from £38 a month Priority Card: Gym Session Adult £12.50 Concession £8.50 Casual User: Gym Session Adult £15.40 Concession £10.20
David Lloyd (Kings Hill)	Mon-Fri 6am - 11pm Sat-Sun 7am - 10pm Members only	Basic Membership £94.50 per month
Evolution Strength and Fitness	Mon-Fri 6am - 10pm Sat 8am - 8pm Members only	Peak membership £37 per month Off-peak membership £29 per month
Hilden Health and Fitness Club	Mon-Thurs 6.30am - 8.30pm Fri 6.30am - 8pm Sat 8am - 8pm Sun 8am - 7pm Members only	Peak membership £39.99 per month Off-peak membership £29.99 per month
Infinity Fitness UK	Mon-Thurs 6am - 10pm Fri 6am - 9pm Sat-Sun 8am - 8pm Membership and 'pay-and-play'	Gym membership £28.99 per month Gym & classes membership £34.99 per month Casual use gym: £7.50 per session Casual use classes: £8 per session
K-Sports	Mon-Fri 7am - 10pm Sat-Sun 8am - 4pm Members only	Membership £29.99 per month Concessions membership £24.99 per month
Larkfield Leisure Centre	Mon-Fri 6.30am - 10.30pm Sat 6.30am - 7pm Sun 6.30am - 8pm Membership and 'pay-and-play'	Health & Fitness Membership from £38 a month Priority Card: Gym Session Adult £12.50 Concession £8.50 Casual User: Gym Session Adult £15.40 Concession £10.20
Nizel's Golf and Country Club	Mon-Fri 6.30am - 10pm Sat-Sun 7am - 9pm Members only	Membership £78.50 per month
Puregym Tonbridge	Currently closed. 24 hours 7 days per week. Members only	Membership from £26.99 per month
Reynolds Retreat	Mon-Thurs 6am - 10pm Fri 6am - 9pm Sat-Sun 8am - 6pm Members only	Membership from £159 per month

Facility	*Opening hours and basis of use*	*Pricing*
Snap Fitness (Tonbridge)	24 hours 7 days per week. Membership and 'pay-and-play'	Membership £39.99 per month Day pass £7.20
Snodland Community Centre	Mon, Weds and Fri 9am - 11am and 5pm - 8pm Membership and 'pay-and-play'	-
Spirit Health Club	Mon-Fri 6.30am - 10pm Sat-Sun 7am - 10pm Members only	Peak membership £55 per month Off-peak membership £50 per month
Tonbridge School	Mon-Fri 6am - 9pm Sat 8am - 9pm Sun 9am - 7.30pm Members only	Membership £69 per month Bookings on-line.

7.6 Key findings on supply

The key findings are as follows:

- There are 14 publicly accessible health and fitness facilities currently available in Tonbridge and Malling, including one facility that is currently closed for refurbishment, collectively comprising 1,007 equipment stations. All have secured community access.

- Levels of provision per capita vary widely across the borough, with the Tonbridge sub-area having more than double the rate of equipment stations per 1,000 people than the Mallings sub-area.

- The quality of facilities is generally 'good', although disability access is problematic at three sites.

- The whole population of the borough is within 20-minutes' drivetime of at least one health and fitness facility.

- Four facilities offer 'pay-and-play' public access, but many of the remaining facilities offer a 'day pass' arrangement, allowing short-term access on a non-membership basis.

- Membership charges vary between £27 and £159 per month, although there are discounted introductory offers at many facilities. There are varying approaches to membership terms with some operators insisting on minimum term contracts whilst others allow month by month membership with the ability to cancel at any time.

7.7 Current demand for health and fitness facilities

7.7.1 Expressed demand

The 2024 *'State of the UK Fitness Industry'* report reveals that the UK health and fitness industry is continuing to grow, with just over 7,000 fitness facilities, a fall of 3.3% from the high of 7,239 in 2019.

10.7 million people in the UK (1 in 7) was a member of a gym in 2024, an all-time penetration rate high of 15.9%. The low-cost market with its large membership numbers, online joining, long opening hours and low-prices has continued to expand rapidly. The private low-cost sector now accounts for 12% of the total number of private clubs, 13% of the private market value and 32% of the private sector membership.

- Pure Gym and GLL remain the UK's leading private and public operators (by number of gyms and members).

- Local fitness facility operators all indicated that there was an overall growth in the market (although no actual figures were given due to commercial sensitivity) although it is highly competitive and gyms are having to work hard to maintain their share of the market. Members are now more sophisticated and willing to switch between clubs. Operators are having to develop a wider range of fitness products including individual, health-related programmes and app-based fitness regimes and to vary and update their classes on a regular basis to keep up to date with changing fashions.

7.7.2 Spare capacity

Consultations with local health and fitness facility operators revealed that there is some spare capacity at peak periods. All but the smallest operators emphasise 'no waiting' as a selling point to prospective members. Peak time spare capacity is assessed to be around 10% or the equivalent of 100 equipment stations.

7.7.3 Displaced demand

Displaced demand relates to use of health and fitness facilities from within the study area which takes place outside of the area. The following facilities are located in adjacent areas, close enough to the borough boundary to provide usage opportunities for residents of the borough.

Facility	*Address*	*Distance from Tonbridge and Malling*
Bob Prowse Health Club	Armstrong Road, Maidstone ME15 6AZ	2 miles
Lockmeadow Health Club	Barker Road, Maidstone ME16 8LW	2 miles
Feel Good Health Club	Ashford Road, Maidstone ME17 1RE	3 miles
Freedom Leisure Maidstone	St. Peter's Street, Maidstone ME16 0SX	3 miles
LivingWell Health Club	Bearsted Road, Maidstone ME14 5AA	2 miles
Maidstone Leisure Centre	Mote Park, Maidstone ME15 8NQ	2 miles
Marriott Leisure Club	Ashford Road, Maidstone ME17 4NQ	3 miles
Snap Fitness	High Street, Maidstone ME14 1JH	3 miles
truGym Maidstone	The Broadway, Maidstone ME16 8PS	3 miles
Village Gym (Maidstone)	Forstal Road, Maidstone ME14 3AQ	2 miles
Welcome Gym	London Road, Maidstone ME16 0DT	2 miles
Maidstone YMCA	Melrose Close, Maidstone ME15 6BD	2 miles
Puregym (Sevenoaks)	Otford Road, Sevenoaks TN14 5EG	3 miles
Sevenoaks Leisure Centre	Buckhurst Lane, Sevenoaks TN13 1LW	3 miles
Sennocke Centre	High Street, Sevenoaks TN13 1HU	3 miles
Putlands Sports Centre	Mascalls Court Road, Tunbridge Wells TN12 6NZ	4 miles
Tunbridge Wells Sports Centre	St. Johns Road, Tunbridge Wells TN4 9TX	2 miles

Facility	*Address*	*Distance from Tonbridge and Malling*
Lordswood Leisure Centre	North Dane Way, Chatham ME5 8YE	1 mile
Puregym (Tunbridge Wells)	Royal Victoria Place, Tunbridge Wells TN1 2SW	2 miles
Nuffield Health (Tunbridge Wells)	Knights Way, Tunbridge Wells TN2 3UW	2 miles
Sir Joseph Williamson's School	Maidstone Road, Rochester ME1 3EL	1 mile
Strood Sports Centre	Watling Road, Strood ME2 3JQ	2 miles
Village Gym (Maidstone)	Forstal Road, Maidstone ME14 3AQ	1 mile

7.7.3 Unmet demand

UK Active has devised a model that provides guidance on the supply of health and fitness stations against the current anticipated demand. The model uses national data from fitness facility operators, with the most recent local data for health and fitness participation from the *'Active Lives'* survey. The model anticipates a need for 712 fitness stations, which compares with actual supply of 1,007 stations, indicating notional spare capacity of 295 stations, although 259 stations are currently unavailable in facilities that are undergoing refurbishment.

Element	*Value*	*Number*
Tonbridge and Malling adult population	-	107,346
% health and fitness participants	5.95%	6,387
Average visits per week	2.4	15,329
No. visits at peak period	65%	9,964
Capacity in one hour of peak time	28	356
No. stations required at peak time	-	712

7.8 Local sports participation priorities

There are no specific local sports participation priorities in Tonbridge and Malling, other than a general policy commitment to promote health and well-being through increased levels of physical activity. Health and fitness facilities have a particular role to play in this, given the breadth of appeal to all age groups.

7.9 Assessments of need in neighbouring areas

The table below summarises strategic assessments of health and fitness facilities needs in neighbouring areas.

Local Authority	Facilities priorities	Implications for Tonbridge and Malling
Maidstone Borough Council	The *'Maidstone Sports Facilities Strategy'* (2019) states that 'current health and fitness facilities in Maidstone are assessed to be at operating at close to full capacity. there will be demand for 1,303 stations by 2037, an increase of 230 over the existing figure'.	There is no spare capacity to serve demand from Tonbridge and Malling.
Tunbridge Wells Borough Council	The *Tunbridge Wells Borough Indoor/Built Sports Facilities Needs Assessment 2017-2033'* (2018) concludes that there is sufficient capacity to meet current needs, but that demand equivalent to 111 fitness equipment stations will need to be accommodated by 2033.	There is some spare capacity that could meet demand from Tonbridge and Malling.
Sevenoaks District Council	The *'Sevenoaks Sports Facilities Strategy 2016-2025'* (2017) identifies that 'there is a current under-supply of 157 stations. Based on current provision of 204 pay and play community accessible fitness stations, this means there would be an under-supply of 219 stations by 2035'.	There is no spare capacity at to meet demand from Tonbridge and Malling.
Gravesham Borough Council	The *'Gravesham Indoor Sports Facilities Strategy and Action Plan 2016-2026'* (2016) identified an action to 'improve access to facilities during the daytime given the current reliance on educational facilities for indoor activity'.	There is no spare capacity at to meet demand from Tonbridge and Malling.
Medway Council	The *'Medway Sports Facilities Strategy and Action Plan'* (2017) concludes that 'Medway is well served by a range of health and fitness facilities, providing for a range of different budgets. Future population growth will increase the amount of health and fitness provision required in the longer term'.	There is some spare capacity that could meet demand from Tonbridge and Malling.

7.10 Future demand for health and fitness facilities

7.11.1 Population growth

Two scenarios are considered:

- The ONS 2018 sub-national population projections forecast a population of 153,604 by 2042, an increase of 21,404 (or 16.2%).
- A projection based on assessed housing needs predicts a population of 186,351 by 2042, an increase of 54,151 (or 41.0%).

7.11.2 Participation rates

One factor in considering future sports participation rates is to track historical trends, as a guide to possible future developments. Recent covid-affected figures have been excluded as anomalous.

- ***National trends:*** Sport England's *'Active Lives'* survey has recorded adult (16+) weekly participation rates for fitness activities since 2016:

May 2016-May 2017	Nov 2016-Nov 2017	May 2017-May 2018	Nov 2017-Nov 2018	May 2018-May 2019	Nov 2018-Nov 2019	May 2019-May 2020	% Change
29.5%	29.7%	29.7%	30.0%	30.4%	30.8%	30.4%	+0.9%

- ***Local trends:*** Sport England's *'Active Lives'* survey recorded the proportion of the adult (16+) population who are active for at least 150 minutes per week in Tonbridge and Malling between 2015 and the present. The results are tabulated below and show that whilst rates have fluctuated over the survey periods, there is a downward trend between 2015 and 2022:

Nov '15 - Nov '16	*May '16 - May '17*	*Nov '16- Nov '17*	*May '17- May '18*	*Nov '17- Nov '18*	*May '18- May '19*	*Nov '18- Nov '19*	*May '19- May '20*	*Nov '19- Nov '20*	*May '20- May '21*	*Nov '20- Nov '21*	*Nov '21- Nov '22*	*% Change*
66.3%	66.9%	66.8%	67.4%	68.8%	69.5%	69.4%	66.0%	66.0%	66.6%	65.1%	64.2%	-2.5%

7.11.3 Future projections

Two scenarios are considered:

- ***ONS Projections:*** The ONS 2018 sub-national population projections forecast a population of 153,604 by 2042, an increase of 21,404 (or 16.2%). Based on current demand for 712 equipment stations there is effective spare capacity of 29.3% at local facilities in the peak period (equivalent to 295 stations). Population growth of 16.2% will create a demand for an additional 116 stations by 2042. Participation increases of 18% will create demand for a further 128 stations by 2042, creating total additional demand for 244 stations.

Element	*No. stations*
Existing stations	1,007
Existing peak demand	712
Existing spare capacity	295
Population increase (16.2%)	116
Participation increase (18%)	128
No. stations required at peak time by 2042	956
Surplus(+)/deficit(-)	+51

- ***Housing projections:*** A projection based on assessed housing needs predicts a population of 186,351 by 2042, an increase of 54,151 (or 41.0%). Based on current demand for 767 equipment stations there is effective spare capacity of 29.3% at local facilities in the peak period (equivalent to 295 stations). Population growth of 41.0% will create a demand for an additional 292 stations by 2042. Participation increases of 18% will create demand for a further 128 stations by 2042, creating total additional demand for 420 stations.

Element	*No. stations*
Existing stations	1,007
Existing peak demand	712
Existing spare capacity	295
Population increase (41.0%)	292
Participation increase (18%)	128
No. stations required at peak time by 2042	1,132
Surplus(+)/deficit(-)	-125

7.11 Key findings on demand

The key findings are as follows:

- Demand for health and fitness facilities in Tonbridge and Malling equates to 712 equipment stations, based upon the UK Active market calculation.
- With 1,007 stations at facilities in Tonbridge and Malling, there is collective peak time spare capacity of 29.3%, or the equivalent of 295 stations.
- Based on the lower population projections, additional demand for 244 stations by 2042 can be accommodated by existing spare capacity.
- Based on the higher population projections, additional demand for 420 stations by 2042 will require the provision of an additional 125 equipment stations.

7.12 The balance between health and fitness supply and demand

Four criteria have been assessed to evaluate the balance between health and fitness facility supply and demand in Tonbridge and Malling:

- ***Quantity:*** Are there enough facilities with sufficient capacity to meet needs now and in the future?
- ***Quality:*** Are the facilities fit for purpose for the users now and in the future?
- ***Accessibility:*** Are the facilities in the right physical location for the users now and in the future?
- ***Availability:*** Are the facilities available for those who want to use them now and in the future?

7.13 Quantity

7.13.2 Current needs

Current health and fitness facilities in Tonbridge and Malling are assessed to be operating with spare capacity (excluding the current temporary closures), based upon the current peak capacity averaging 70% across all facilities.

7.13.2 Future needs

The quantity of health and fitness provision required to meet future needs arising from population growth has been assessed between 244 and 420 stations. Based on the lower population estimate, existing spare capacity will meet all needs to 2042 and based upon the higher population estimate, there will be a need for an additional 125 equipment stations.

7.14 Quality

7.15.1 Current quality

The quality of most facilities is at least 'standard', although the changing facilities at K-Sports and the disabled access at K-Sports, Hilden Health and Fitness and Spirit Health Club are all 'poor'.

7.15.2 Future quality

In a highly competitive market, commercial health and fitness providers place a premium on equipment innovation and facility quality, so it seems reasonable to assume that local provision will continue to be upgraded regularly.

7.15 Accessibility

7.16.1 Current accessibility

The whole population is within 20 minutes driving time of at least one health and fitness facility.

7.16.2 Future accessibility

Commercial health and fitness operators are likely to ensure that additional facilities are provided that are well-located in relation to new housing developments.

7.16 Availability

7.17.1 Current availability

Membership charges vary between £27 and £159 per month, although there are discounted introductory offers at many facilities. There are varying approaches to membership terms with some operators insisting on minimum term contracts whilst others allow month by month membership with the ability to cancel at any time.

7.17.2 Future availability

With a competitive local market, it seems unlikely that cost will be a barrier to accessibility in the future. However, less affluent residents may be discouraged by long-term contracts and the comparative paucity of 'pay-and-play' facilities.

7.17 Contribution to shared strategic outcomes

Based upon the assessment above, the extent to which health and fitness facility provision in Tonbridge and Malling contributes to the shared strategic outcomes is as follows:

- Health and fitness appeals to a broad cross-section of the community, both residents and visitors to the borough..
- TMActive operates a highly successful Referral Programme and Phase IV Cardiac Rehabilitation Programme.

Through a combination of prescribed exercise and lifestyle and dietary advice the 12 week Referral Programme aims to assist individuals to take responsibility for their own wellbeing and improve their health.

7.18 The options for securing additional health and fitness capacity

The options for securing existing and additional health and fitness facility capacity to meet current and future needs are as follows:

7.18.1 Protect

Local Plan policies for the protection of existing health and fitness facilities through the Local Plan will be key both to securing local provision by ensuring that planning policy supports the retention of existing facilities for which existing and/or future demand has been identified, including those with membership-only access, unless the loss of a facility would involve its replacement with a facility of at least the equivalent size, quality and accessibility.

7.18.2 Provide

Ensuring that extra health and fitness capacity is achieved by encouraging the provision of health and fitness facilities by commercial leisure providers.

7.18.3 Enhance

Enhancing existing health and fitness capacity for people with disabilities.

7.19 Action Plan

The table below sets out the action plan for health and fitness facilities to guide the implementation of the Assessment. All actions are generic, rather than facility specific.

Issues	*Action*	*Lead*	*Partners*	*Resources*	*Priority*
Protection of existing health and fitness facilities.	Consider including a policy in the Local Plan to protect all existing health and fitness facilities.	TMBC	Sport England, Active Kent and Medway	Planning Policy team	High
Need for an additional 125 fitness stations by 2042.	Encourage commercial health and fitness provision.	TMBC	Commercial providers	Sport England Guidance	High
Poor disabled access at Hilden Health Club, K-Sports and Spirit Health Club.	Improve disabled access and encourage all sites to provide equipment that is suitable for disabled users.	All providers	TMBC	LABC (if used)	High
Funding for future health and fitness needs.	Ensure that provision is made to secure developer contributions towards and improved facilities.	TMBC	Sport England, Active Kent and Medway Developers	Planning Development Management team	High

8 SQUASH COURTS

8.1 Introduction

This section examines the provision of squash courts in Tonbridge and Malling. Squash courts are defined as specialist courts for squash and racquetball, complying with regulation dimensions.

8.2 Quantity

8.2.1 Squash Courts with Community Use

The location and number of squash courts with community use in Tonbridge and Malling is as follows. All facilities have secured community access:

Facility	*Address*	*Courts*	*Year built/ refurbished*	*Sub-area*
Poult Wood Golf Club	Higham Lane, Tonbridge TN11 9QR	4	1974	Tonbridge
Tonbridge School	London Road, Tonbridge TN10 3AD	4	1975	Tonbridge

8.2.2 Squash courts where use was recently discontinued

Facility	*Address*	*Courts*	*Year built/ refurbished*	*Sub-area*
K-Sports	Station Road, Aylesford ME20 2AU	2	1990	Mallings

8.2.3 Sub-area analysis

Squash courts with community use by sub-area in Tonbridge and Malling are as follows:

Sub-area	*Sub-area population 2021*	*No. courts*	*Courts per capita*
Tonbridge and surrounds	56,018	8	1: 7,002
Mallings and surrounds	76,182	0	-
TONBRIDGE & MALLING	***132,200***	***8***	***1: 16,525***

8.3 Quality

8.3.1 The criteria assessed

The quality of squash courts was assessed by a non-technical visual inspection during a site visit to all facilities. The criteria that were assessed to give a single overall score for each squash facility were the court surface, changing provision, line markings, walls, disability and general access and fitness for purpose.

8.3.2 The basis of the ratings

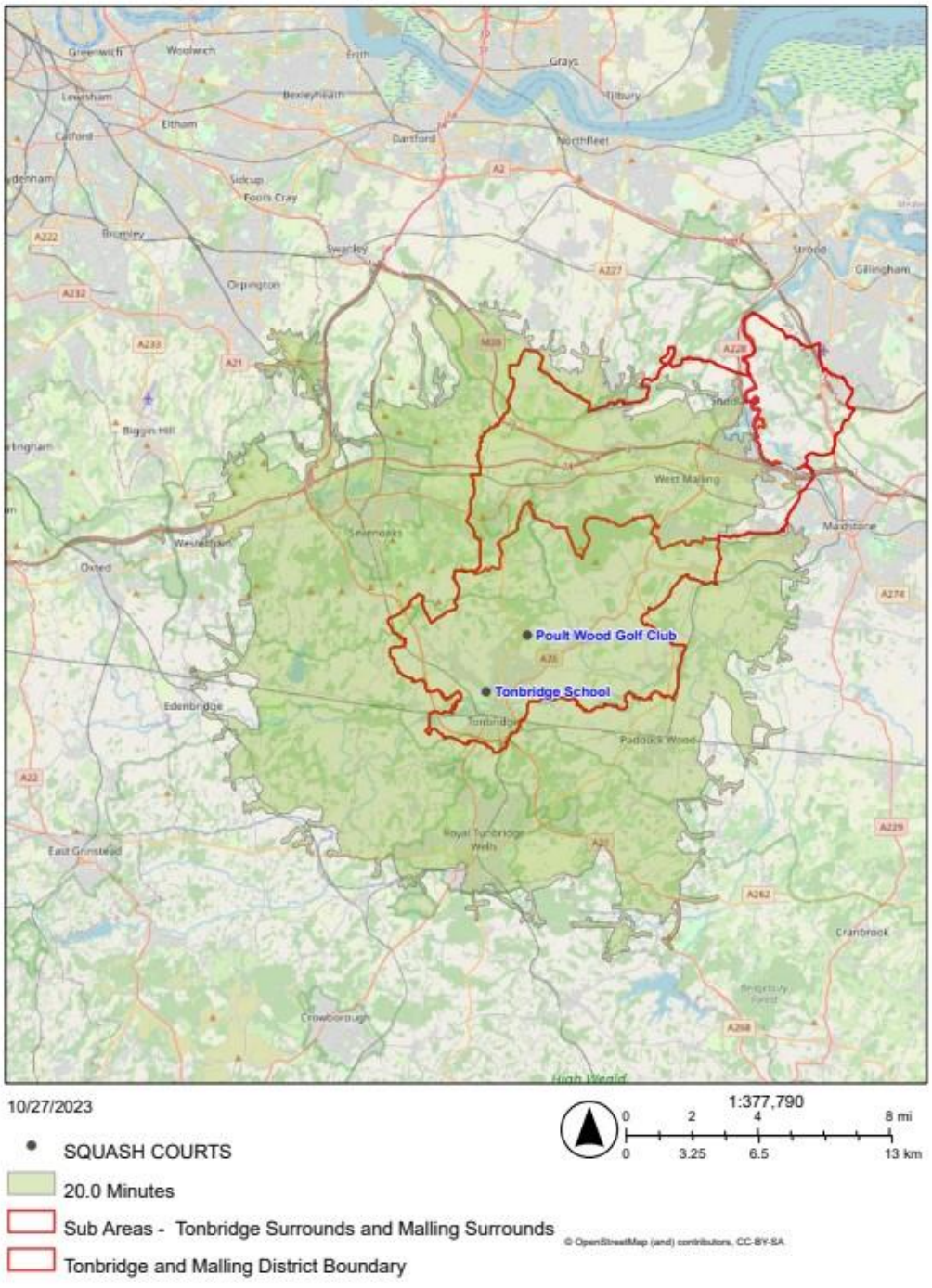
The facilities were rated on a five-point scale, where 5 equates to 'very good', 4 to 'good' (highlighted in green below), 3 to 'average', 2 to 'poor' and 1 to 'very poor'. The ratings for the squash courts in Tonbridge and Malling are shown in the table below.

Facility	*Courts*	*Changing*	*Disability Access*	*General Access*
Poult Wood Golf Club	4	4	5	5
Tonbridge School	5	5	5	4

8.3.3 Accessibility

Based on Sport England research, the 'effective catchment' for squash courts is 20 minutes driving time. Most of the population is within 20-minutes' drive of a squash court, with the exception of a small area in the north-east, which is served by provision in Maidstone..

Tonbridge and Malling - Squash Courts 20 Minutes Drive



8.4 Availability

The table below identifies the opening hours, usage arrangements, pricing and used capacity in the peak period.

Facility	*Opening hours and basis of use*	*Pricing*	*Peak usage*
Poult Wood Golf Club	Mon-Sun 8am - 10pm 'Pay-and-play'	Adult court hire £9 - £10 per hour. Concessions £6 - £6.50 per hour Club membership £50 per annum for adults £15 per annum for juniors.	
Tonbridge School	Mon-Fri 8am - 1.30pm and 6pm - 10pm Sat 8am - 1.30pm and 3pm - 10pm Sun 8am - 4pm and 6pm - 10pm Club use only	Annual membership £130.	

8.5 Key findings on supply

The key findings are as follows:

- There are two facilities with community use in Tonbridge and Malling, collectively containing eight squash courts. Both have secured community access.
- England Squash states that there should be one squash court per 10,000 people in England, based upon existing levels of provision. Current per capita levels of provision in Tonbridge and Malling are worse than the national average at one court per 16,525 people.
- The quality of both facilities is rated as 'good'.
- 'Pay-and-play' squash courts are available at both sites.
- Most of the population is within 20-minutes' drive of a squash court. Both facilities are in the Tonbridge sub-area, with no provision in the north of the borough.

8.6 Current demand for squash courts

8.7.1 Expressed demand

There are two squash clubs in the borough:

Facility	*Facility*	*Membership*
Poult Wood Squash and Racquetball Club	Poult Wood Golf Course	90
Tonbridge Squash Club	Tonbridge School	64
TOTAL	**-**	***154***

Peak period demand at Squash courts in Tonbridge and Malling has some spare capacity.

Facility	Peak usage
Poult Wood Golf Club	70%
Tonbridge School	60%

8.7.2 Displaced demand

Displaced demand relates to users of squash courts from within the study area which takes place outside of the area. The following facilities are located in adjacent local authority areas, close enough to the borough boundary to provide usage opportunities for Tonbridge and Malling residents.

Facility	Address	Distance from Tonbridge and Malling
Maidstone Squash Club	Union Street, Maidstone ME14 1EB	2 miles
Mote Squash Club	Mote Park, Maidstone ME15 7RN	3 miles
Tunbridge Wells Sports Centre	St. Johns Road, Tunbridge Wells TN4 9TX	2 miles
Tunbridge Wells Squash Club	London Road, Tunbridge Wells TN1 1DL	2 miles
Hartley Country Club	Culvey Close, Longfield DA3 8BS	3 miles
Sennocke Centre	High Street, Sevenoaks TN13 1HU	3 miles

8.7.3 Unmet demand

Unmet demand involves two components:

- Demand that cannot be met within a facility catchment due to excess demand for that facility.
- Demand that cannot be met because it is located outside the catchment of a facility.

Neither of the clubs in the borough has a waiting list. Use of the two courts at K-Sports was recently discontinued due to lack of demand.

8.7 Assessments of need in neighbouring areas

The table below summarises strategic assessments of squash court needs in neighbouring areas.

Local Authority	Facilities priorities	Implications for Tonbridge and Malling
Maidstone Borough Council	The *'Maidstone Sports Facilities Strategy'* (2019) states that 'there are two facilities with community use in Maidstone, collectively containing six squash courts, plus one facility on a school site with two courts and no public access. There is sufficient spare capacity at existing courts to meet all additional demand to 2031'.	There is some spare capacity to serve demand from Tonbridge and Malling.
Tunbridge Wells Borough Council	The *Tunbridge Wells Borough Indoor/Built Sports Facilities Needs Assessment 2017-2033'* (2018) does not include an assessment of squash court needs. There are 12 courts with community access, plus five on school sites with no public access.	There is some spare capacity to serve demand from Tonbridge and Malling.
Sevenoaks District Council	The *'Sevenoaks Sports Facilities Strategy 2016-2025'* (2017) identifies that 'there is no need for additional squash court provision to meet current or future needs'.	There is some spare capacity to meet demand from Tonbridge and Malling.

Local Authority	Facilities priorities	Implications for Tonbridge and Malling
Gravesham Borough Council	The *'Gravesham Indoor Sports Facilities Strategy and Action Plan 2016-2026'* (2016) identified 'the supply of courts available is sufficient to meet current levels of demand'.	There is some spare capacity at to meet demand from Tonbridge and Malling.
Medway Council	The *'Medway Sports Facilities Strategy and Action Plan'* (2017) concludes that 'the current level of provision is adequate to meet current needs. The provision of squash courts in the future should be made on a site-by-site basis with decisions likely to be driven by the financial viability of these specific spaces'.	There is some spare capacity at to meet demand from Tonbridge and Malling.

8.8 England Squash priorities

England Squash and Racquetball's *'Game Changer: Participation Strategy'* (2015) contains the following material of relevance to squash court provision:

Facilities priorities	Implications for Tonbridge and Malling
England Squash and Racquetball's *'Game Changer: Participation Strategy'* (2015) states that 'although we support the development of facilities, our resources cannot create a significant impact on the thousands of courts in the country. Our past efforts to support court development have been beneficial but limited'.	There is a limited role for the governing body in promoting squash court provision.

Consultation with the England Squash and Racquetball identified the following issues:

- 'Squash is a sport that has long been recognised as providing a great 'all around fitness workout' at all levels of play. It remains a very interesting option to casual players as well as committed club players. It is relatively simple for beginners to develop basic skills, instantly providing the opportunity for fun and a huge scope for progression. It provides an excellent workout in just 45 minutes. The sport of racquetball (now rebranded by World Squash as Squash57) has in the past few years increasingly been gaining ground as a go-to sport for women and older people'.

- 'That said the number of people playing squash has clearly declined since the extraordinary heyday of the 1980s and 1990s - when it was a self-advertising, 'new' sport and first recognised as a very social activity. But all sports have their peaks and troughs of success and, although now less popular, squash still has a very strong following. Nationally, English players and representative teams are still amongst the best in the world'.

- 'Squash courts are, obviously, the essential facility requirement to play squash. Each club has its own courts and programme to attract new adult and junior players. In addition, the public availability of squash courts is essential - whilst clubs can organise local trial opportunities (especially for juniors) the public facilities in Leisure Centres have always been a playing opportunity that helps build the initial interest of so many new players to our sports'.

8.9 Future demand for squash courts

8.9.1 Population growth

Two scenarios are considered:

- The ONS 2018 sub-national population projections forecast a population of 153,604 by 2042, an increase of 21,404 (or 16.2%).

- Objectively assessed Local Housing Need (LHN) amounts 1,090 dwellings per year (23,544 dwellings by 2042). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 54,151 to 186,351 (or 41.0%).

8.9.2 Participation rates

One factor in considering future sports participation rates is to track historical trends, as a guide to possible future developments. Recent covid-affected figures have been excluded as anomalous.

- ***National trends:*** Sport England's *'Active Lives'* survey has recorded adult (16+) weekly participation rates for squash since 2015:

Nov 2015-Nov 2016	*Nov 2016-Nov 2017*	*Nov 2017-Nov 2018*	*Nov 2018-Nov 2019*	*Nov 2019-Nov 2020*	*Nov 2020-Nov 2021*	*Nov 2021-Nov 2022*	*% Change*
1.0%	0.8%	0.7%	0.7%	0.4%	0.2%	0.6%	-0.4%

- ***Local trends:*** Sport England's *'Active Lives'* survey recorded the proportion of the adult (16+) population who are active for at least 150 minutes per week in Tonbridge and Malling between 2015 and the present. The results are tabulated below and show that whilst rates have fluctuated over the survey periods, there is a downward trend between 2015 and 2022:

Nov '15 - Nov '16	*May '16 - May '17*	*Nov '16- Nov '17*	*May '17- May '18*	*Nov '17- Nov '18*	*May '18- May '19*	*Nov '18- Nov '19*	*May '19- May '20*	*Nov '19- Nov '20*	*May '20- May '21*	*Nov '20- Nov '21*	*Nov '21- Nov '22*	*% Change*
66.3%	66.9%	66.8%	67.4%	68.8%	69.5%	69.4%	66.0%	66.0%	66.6%	65.1%	64.2%	-2.5%

8.9.3 Future projections

National squash participation rates have been falling in recent years and set alongside reductions in general activity rates in Tonbridge and Malling over the same period, it would therefore be reasonable to assume that demand for squash will at best remain static until 2042. Based on current demand, there is effective spare capacity of 35% at local facilities in the peak period. An increase of 21,404 (or 16.2%) in the Tonbridge and Malling population by 2042 will increase demand for squash court capacity by a similar amount. Alternatively, an increase of 54,151 (or 41.0%) in the Tonbridge and Malling population by 2042 will increase demand for squash court capacity by a similar amount. In both cases, this can also be accommodated by existing spare capacity.

8.10 Key findings on demand

The key findings are as follows:

- Squash participation rates in Tonbridge and Malling are projected to remain static until 2042.

- An increase 21,404 (or 16.2%) in the Tonbridge and Malling population by 2042 will increase demand for squash court capacity by a similar amount. Alternatively, an increase of 54,151 (or 41.0%) in the Tonbridge and Malling population by 2042 will increase demand for squash court capacity by a similar amount.

8.11 The balance between squash court supply and demand

Four criteria have been assessed to evaluate the balance between squash court supply and demand in Tonbridge and Malling:

- ***Quantity:*** Are there enough courts with sufficient capacity to meet needs now and in the future?
- ***Quality:*** Are the courts fit for purpose for the users now and in the future?
- ***Accessibility:*** Are the courts in the right physical location for the users now and in the future?
- ***Availability:*** Are the courts available for those who want to use them now and in the future?

8.12 Quantity

8.14.1 Current needs

Current squash courts in Tonbridge and Malling are collectively assessed to be at operating with substantial spare capacity, based upon the following evaluation:

- ***Used peak capacity:*** The courts in the borough are currently used to 65% capacity in the peak period.
- ***Unmet demand:*** There is no evidence of any unmet demand.
- ***Changes in supply:*** There are no known planned changes to supply.

8.14.2 Future needs

Spare capacity at the existing courts will be able to accommodate all additional future demand.

8.13 Quality

8.14.1 Current quality

The quality of all facilities is rated as 'good'.

8.14.2 Future quality

Assuming that existing providers continue to invest in maintaining and improving their facilities and that this process can be assisted with funding from developer contributions in the future, it seems reasonable to assume that local provision will continue to be upgraded regularly.

8.14 Accessibility

8.15.1 Current accessibility

The whole population is within 20 minutes driving time of the nearest squash court.

8.15.2 Future accessibility

Since the current facilities are geographically relatively well-located to serve boroughwide needs, they will continue to serve future needs.

8.15 Availability

8.16.1 Current availability

Pay-and-play' squash courts are available at one site.

8.16.2 Future availability

It is reasonable to assume that similar usage arrangements will be offered in the future.

8.16 Contribution to shared strategic outcomes

Based upon the assessment above, the extent to which squash court provision in Tonbridge and Malling contributes to the shared strategic outcomes is as follows:

- Squash is a specialist activity that appeals to a limited cross-section of the community and as such it is unlikely to engage many new or lapsed participants.
- Some local courts have been re-purposed on a temporary or permanent basis to accommodate other sports and this flexibility allows a wider range of activities to be programmed using the space available.

8.17 The options for securing additional squash court capacity

The options for securing existing squash court capacity to meet current and future needs are:

8.18.1 Protect

Local Plan policies for the protection of existing squash courts through the Local Plan will be key both to securing local provision by ensuring that planning policy supports the retention of existing facilities for which existing and/or future demand has been identified, unless the loss of a facility would involve its replacement with a facility of at least the equivalent size, quality and accessibility.

8.18.2 Provide

Future demand relating to population growth will not require the provision of additional squash courts.

8.18.3 Enhance

Enhancing existing squash courts by ensuring that the courts and ancillary facilities receive regular maintenance and improvements.

8.18 Action Plan

The table below sets out the action plan for squash courts to guide the implementation of the Assessment.

Issues	*Action*	*Lead*	*Partners*	*Resources*	*Priority*
Protection of existing squash courts.	Consider including a policy in the Local Plan to protect all existing squash courts.	Sport England Active Kent and Medway	Planning policy team	-	High
Existing spare capacity can meet future demand by 2042.	Include a policy in the Local Plan to protect all existing squash courts.	Sport England Active Kent and Medway	Planning policy team	-	High
Maintaining existing squash courts	Encourage providers to maintain existing courts to sustain and improve current quality and improve access wherever possible.	Court providers	-	Dependent on the scale of provision.	High

9 INDOOR TENNIS COURTS

9.1 Introduction

This section examines the provision of indoor tennis courts in Tonbridge and Malling. Indoor tennis courts are defined as indoor facilities with appropriate playing surface, line markings, nets and court dimensions for tennis.

9.2 Quantity

9.2.1 Indoor tennis courts with community use

There is one specialist indoor tennis facility in Tonbridge and Malling:

Site	*Address*	*Courts*	*Surface*	*Sub-Area*
David Lloyd (Kings Hill)	King's Hill Avenue, West Malling ME19 4UA	5	Acrylic	Mallings

9.2.2 Indoor tennis courts in neighbouring areas

The following facilities are located in adjacent local authority areas, close enough to the borough boundary to provide usage opportunities for some Tonbridge and Malling residents.

Facility	*Address*	*Distance from Tonbridge and Malling*
Avenue Tennis Centre	Featherby Riad, Gillingham ME8 6AN	4 miles
Bailey Tennis Centre	High Street, Sevenoaks TN13 1HU	3 miles
Legend Sports	Thong Lane, Gravesend DA12 4AF	4 miles
Maidstone Tennis Academy*	St. Peter's Street, Maidstone ME16 0SX	2 miles
Tunbridge Wells Sports Centre	St. John's Road, Tunbridge Wells TN4 9TX	2 miles

* Seasonal covered courts via an air dome

9.3 Quality

9.3.1 The criteria assessed for indoor courts

The criteria that were assessed were as follows:

- ***The court:*** The overall condition, playing surface, clear span roof height, lighting, spectator provision, equipment and fitness for purpose.
- ***Changing facilities:*** The capacity, condition and fitness for purpose.
- ***Disability access:*** The extent of full disabled access to the facility, including the provision of access ramps, dedicated changing, toilets and car parking.
- ***General access:*** Car parking, signposting, external lighting and proximity to public transport.

9.3.2 The basis of the ratings

The facilities were rated on a five-point scale, where 5 equates to 'very good', 4 to 'good', 3 to 'average', 2 to 'poor' and 1 to 'very poor'.

9.3.3 Indoor court assessment

The ratings for the indoor tennis courts are shown in the table below.

Facility	*Courts*	*Changing*	*Disability Access*	*General access*
David Lloyd (Kings Hill)	5	5	4	5

9.4 Accessibility

Based on LTA research, the 'effective catchment' for indoor tennis courts is 30 minutes driving time. The whole population is within 30-minutes' drive time of an indoor tennis court.

Tonbridge and Malling - Indoor Tennis 30 Minutes Drive



9.5 Availability

The courts at David Lloyd (Kings Hill) are available on the following basis:

Facility	*Opening hours use*	*Pricing*	*Peak usage*
David Lloyd (Kings Hill)	Mon-Fri 6am - 11pm Sat-Sun 7am - 10pm Members only	Off-peak Membership £94.50 per month. Racket sports only with club platinum membership	75%

9.6 Key findings on supply

The key findings are as follows:

- There are five indoor tennis courts at David Lloyd King's Hill.
- Four specialist facilities in neighbouring areas provide some usage opportunities for Tonbridge and Malling residents.
- The quality of the indoor courts at David Lloyd King's Hill is 'good'.
- The whole of the population of the borough is within 30-minutes' drive time of an indoor tennis court either in the borough or in a neighbouring area.
- The courts at David Lloyd (Kings Hill) are available on a membership basis only and the fee levels may exclude some potential users.

9.7 Current demand for indoor tennis courts

9.7.1 Expressed demand

Peak period demand at David Lloyd King's Hill is around 75% utilisation.

9.7.2 Displaced demand

The following facilities in adjacent areas are close enough to the borough boundary to provide usage opportunities for some Tonbridge and Malling residents.

Facility	*Address*	*Distance from Tonbridge & Malling*
Avenue Tennis Centre	Featherby Riad, Gillingham ME8 6AN	4 miles
Bailey Tennis Centre	Sevenoaks School, High Street, Sevenoaks TN13 1HU	3 miles
Legend Sports	Thong Lane, Gravesend DA12 4AF	6 miles
Tunbridge Wells SC	St. John's Road, Tunbridge Wells TN4 9TX	3 miles

9.7.3 Unmet demand

There is no evidence of any unmet demand in the borough.

9.8 Local sports participation priorities

There are no specific local sports participation priorities in Tonbridge and Malling, other than a general policy commitment to promote health and well-being through increased levels of physical activity. As an activity appealing to both genders and most age groups, tennis is likely to have some appeal to new and lapsed sports participants.

9.9 Assessments of need in neighbouring areas

The table below summarises strategic assessments of indoor tennis needs in neighbouring areas.

Local Authority	*Facilities priorities*	*Implications for Tonbridge and Malling*
Maidstone Borough Council	The *'Maidstone Sports Facilities Strategy'* (2019) states that 'there are four seasonally covered indoor tennis courts with community use in Maidstone. There is sufficient spare capacity at existing indoor courts to cater for all additional demand to 2031'.	There is some spare capacity to serve demand from Tonbridge and Malling.
Tunbridge Wells Borough Council	The *Tunbridge Wells Borough Indoor/Built Sports Facilities Needs Assessment 2017-2033'* (2018) concludes that there is sufficient capacity to meet current needs and that additional demand by 2033 can be accommodated by current spare capacity.	There is some spare capacity to meet demand from Tonbridge and Malling.
Sevenoaks District Council	The *'Sevenoaks Sports Facilities Strategy 2016-2025'* (2017) identifies that current and future need for indoor tennis can be accommodated by the existing facility in the district.	There is some spare capacity to meet demand from Tonbridge and Malling.
Gravesham Borough Council	The *'Gravesham Indoor Sports Facilities Strategy and Action Plan 2016-2026'* (2016) does not address indoor tennis needs, but there are two existing facilities in the borough.	There is some spare capacity to meet demand from Tonbridge and Malling.
Medway Council	The *'Medway Sports Facilities Strategy and Action Plan'* (2017) concludes that 'Avenue Tennis is a private provision that meets indoor needs. If demand increases, it is likely that they will build more indoor courts'.	There is some spare capacity to meet demand from Tonbridge and Malling.

9.10 Lawn Tennis Association priorities

The Lawn Tennis Association's strategic plan 2019 - 2023 *'Tennis for Britain'* (2019) contains the following priorities:

Facilities priorities	*Implications for Tonbridge and Malling*
• ***Visibility:*** Broaden relevance and increase visibility of tennis all year round to build engagement and participation with fans and players. • ***Innovation:*** Innovate in the delivery of tennis to widen its appeal. • ***Investment:*** Support community facilities and schools to increase the opportunities to play. • ***Accessibility:*** Make the customer journey to playing tennis easier and more accessible for anyone. • ***Engagement:*** Engage and collaborate with everyone involved in delivering tennis in Britain, particularly coaches and volunteers, to attract and maintain more people in the game. • ***Performance:*** Create a pathway for British champions that nurtures a diverse team of players, people and leaders. • ***Leadership:*** Lead tennis in Britain to the highest standard so it is a safe, welcoming, well-run sport.	Some opportunities to improve local facilities, linked to tennis participation programmes.

Consultation with the Lawn Tennis Association identified the following issues:

- To establish target locations for future community indoor tennis centres, the LTA modelled data from existing successful indoor tennis centres. This helped to identify the demographic type, volume and catchment size of a successful indoor facility. This modelling was applied across the country to establish the areas of potential demand.

- The key metrics established are that a target location must demonstrate a minimum threshold population of 70,000 within a 20-minute drive time. Of this population, at least 12,500 must identify as having an interest in playing tennis. The drive time extends to 30 minutes for rural areas.

- This approach has enabled the LTA to identify 72 target locations for new indoor tennis venues in England. Neither Tonbridge and Malling or any adjoining local authority areas are identified as a priority targets for additional indoor tennis provision.

9.11 Future demand for indoor tennis courts

9.11.1 Population growth

Two scenarios are considered:

- The ONS 2018 sub-national population projections forecast a population of 153,604 by 2042, an increase of 21,404 (or 16.2%).

- Objectively assessed Local Housing Need (LHN) amounts 1,090 dwellings per year (23,544 dwellings by 2042). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 54,151 to 186,351 or 41.0%.

9.11.2 Participation rates

- ***National trends:*** Sport England's *'Active Lives'* survey has recorded adult (16+) weekly participation rates for tennis at national level since 2015:

2015/16	*2016/17*	*2017/18*	*2018/19*	*2019/20*	*2020/21*	*2021/22*	*% Change*
2.0%	1.9%	1.7%	1.6%	1.5%	1.4%	2.0%	0.0%

- ***Local trends:*** Sport England's *'Active Lives'* survey recorded the proportion of the adult (16+) population who are active for at least 150 minutes per week in Tonbridge and Malling between 2015 and the present. The results are tabulated below and show that whilst rates have fluctuated over the survey periods, there is a downward trend between 2015 and 2022:

Nov '15 - Nov '16	*May '16 - May '17*	*Nov '16- Nov '17*	*May '17- May '18*	*Nov '17- Nov '18*	*May '18- May '19*	*Nov '18- Nov '19*	*May '19- May '20*	*Nov '19- Nov '20*	*May '20- May '21*	*Nov '20- Nov '21*	*Nov '21- Nov '22*	*% Change*
66.3%	66.9%	66.8%	67.4%	68.8%	69.5%	69.4%	66.0%	66.0%	66.6%	65.1%	64.2%	-2.5%

9.11.3 Future projections

National tennis participation rates have been static in recent years with general activity rates in Tonbridge and Malling falling over the same period, it would therefore be reasonable to assume that demand for tennis will remain static until 2042. An increase of 21,404 (or 16.2%) in the Tonbridge and Malling population by 2042 will increase demand for indoor tennis court capacity by a similar amount. Alternatively, an increase of 54,151 (or 41.0%) in the Tonbridge and Malling population by 2042 will increase demand for indoor tennis court capacity by a similar amount. In both cases, this can also be accommodated by existing spare capacity.

9.12 Key findings on demand

The key findings are as follows:

- Tennis participation rates in the borough are projected to remain static until 2042.
- Population growth of in Tonbridge and Malling by 2042 will increase demand for indoor tennis court capacity by a similar amount.

9.13 The balance between indoor tennis court supply and demand

Four criteria have been assessed to evaluate the balance between indoor tennis court supply and demand in Tonbridge and Malling:

- ***Quantity:*** Are there enough courts with sufficient capacity to meet needs now and in the future?
- ***Quality:*** Are the courts fit for purpose for the users now and in the future?
- ***Accessibility:*** Are the courts in the right location for the users now and in the future?
- ***Availability:*** Are the courts available for those who want to use them now and in the future?

9.14 Quantity

9.14.1 Current needs

Current indoor tennis court needs in Tonbridge and Malling are met in part by the courts at David Lloyd (Kings Hill) and in part by the provision at accessible facilities in neighbouring areas, based upon the following evaluation:

- ***Used capacity:*** Peak usage rates are 75% at David Lloyd (Kings Hill) indicating some limited spare capacity.
- ***Satisfied demand:*** There is no evidence of unmet demand in the borough.

9.14.2 Future needs

Spare capacity at the existing David Lloyd (Kings Hill) and indoor tennis courts in neighbouring areas will be able to accommodate all additional future demand.

9.15 Quality

9.15.1 Current quality

The quality of the indoor courts at David Lloyd (Kings Hill) is 'good'.

9.15.2 Future quality

It seems reasonable to assume that courts at David Lloyd (Kings Hill) and accessible facilities in neighbouring areas will continue to be maintained to a high standard.

9.16 Accessibility

9.16.1 Current accessibility

The whole population of the borough is within 30-minutes' drive time of an indoor tennis court either in the borough or in a neighbouring area.

9.16.2 Future accessibility

Future accessibility is likely to remain the same.

9.17 Availability

9.17.1 Current availability

The courts at David Lloyd (Kings Hill) are available on a membership basis only and the fee levels will exclude some potential users.

9.17.2 Future availability

Future availability is likely to reflect the current arrangements.

9.18 Contribution to shared strategic outcomes

Based upon the assessment above, the extent to which indoor tennis court provision in Tonbridge and Malling contributes to the shared strategic outcomes is as follows:

- Indoor tennis is a specialist activity that appeals to a limited cross-section of the community and as such it is unlikely to engage many new or lapsed participants.
- The courts at David Lloyd (Kings Hill) are available on a membership basis only and the fee levels will exclude some potential users.

9.19 The options for securing additional indoor tennis court capacity

The options for securing existing indoor tennis court capacity to meet current and future needs are as follows:

9.19.1 Protect

Policies for the protection of existing tennis courts through the Local Plan will be key to securing local provision. Planning policy supports the retention of existing facilities for which existing and/or future demand has been identified, unless the loss of a facility would involve its replacement with a facility of at least the equivalent size, quality and accessibility.

9.19.2 Enhance

Enhancing existing indoor tennis courts by ensuring that the courts and ancillary facilities receive regular maintenance and improvements.

9.20 Action Plan

The table below sets out the action plan for indoor tennis courts to guide the implementation of the Assessment.

Issues	*Action*	*Lead*	*Partners*	*Resources*	*Priority*
Protection of indoor tennis courts.	Consider including a policy in the Local Plan to protect all existing indoor tennis courts.	Sport England Active Kent and Medway	Planning policy team	-	High
Existing spare capacity can meet future demand by 2042.	Include a policy in the Local Plan to protect all existing indoor tennis courts.	Sport England Active Kent and Medway	Planning policy team	-	High
Maintaining existing indoor tennis courts	Encourage providers to maintain existing courts to sustain and improve current quality and improve access wherever possible.	Court providers	-	Dependent on the scale of provision.	High

10 INDOOR BOWLS FACILITIES

10.1 Introduction

This section examines the provision of indoor bowls facilities in Tonbridge and Malling. Indoor bowls halls are defined specialist indoor facilities with appropriate playing surface and rink dimensions for bowls.

10.2 Quantity

There is one indoor bowls facility in Tonbridge and Malling:

Facility	*Address*	*Rinks*	*Sub-area*
Angel (Tonbridge) Indoor Bowls Club	Avenue Du Puy, Tonbridge TN9 1QH	6	Tonbridge

10.3 Quality

The quality of the indoor bowls hall was assessed by a non-technical visual inspection during a site visit. The criteria that were assessed were as follows:

- ***The green:*** The overall condition, lighting, spectator provision, equipment storage and fitness for purpose.
- ***Changing facilities:*** The capacity, condition and fitness for purpose.
- ***Disability access:*** The extent of full disabled access to the facility, including the provision of access ramps, dedicated changing, toilets and car parking.
- ***General access:*** Car parking, signposting, external lighting and proximity to public transport.

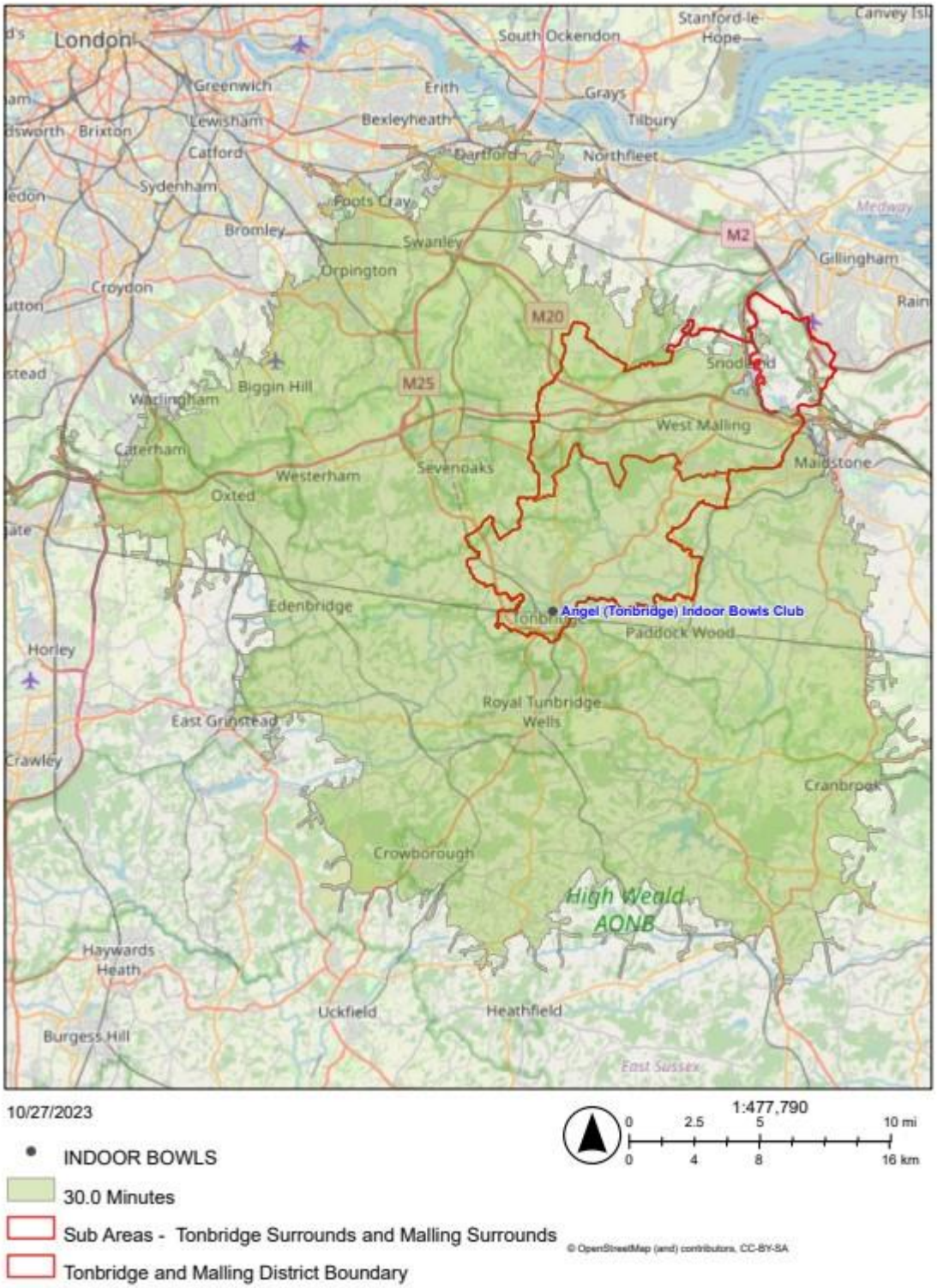
The facilities were rated on a five-point scale, where 5 equates to 'very good', 4 to 'good', 3 to 'average', 2 to 'poor' and 1 to 'very poor'. The ratings for the indoor bowls facility in Tonbridge and Malling are shown in the table below.

Facility	*Green*	*Changing*	*Disability Access*	*General access*
Angel Tonbridge IBC	5	4	5	5

10.4 Accessibility

Based on Sport England research, the 'effective catchment' for indoor bowls facilities (defined as the time/distance travelled and the prevailing mode of transport used by up to 90% of facility users) is 30 minutes driving time. The whole population of the borough is within 30-minutes' drive time of the indoor bowls green in the borough, with the exception of a small area in the north-east that is served by facilities in Maidstone.

Tonbridge and Malling - Indoor Bowls 30 Minutes Drive



10.5 Availability

The table below shows the basis of use of indoor bowls facilities in Tonbridge and Malling.

Facility	Opening hours and basis of use	Pricing	Peak use
Angel (Tonbridge) IBC	Mon-Fri 9am - 11pm Sat-Sun 9am - 8pm	Adult annual membership £95 Junior annual membership £20 Rink fees £4.50 per game	80%

10.6 Key findings on supply

The key findings are as follows:

- There is one indoor bowls facility in Tonbridge and Malling, comprising six rinks. Peak time used capacity is high at 80%.
- The quality of the facility is generally 'good'.
- The whole population is within 30-minutes' drive of an indoor bowls facility.

10.7 Current demand for bowls facilities

10.7.1 Expressed demand

Sport England's *'Indoor Bowls Guidance Note'* (2005) stipulates that full capacity for an indoor bowls facility is reached at 80 - 100 members per rink. The respective membership figures at the facility in Tonbridge and Malling, compared with the facility capacities is tabulated below:

Facility	Capacity	2023 Membership	% Used Capacity
Angel (Tonbridge) IBC	480 - 600	550	92% - 115%

10.7.2 Displaced demand

The following facilities are located in adjacent local authority areas, close enough to the borough boundary to provide usage opportunities for Tonbridge and Malling residents.

Facility	Address	Distance from Tonbridge and Malling
Mote Park (Maidstone) IBC	Willow Way, Maidstone ME15 7RN	2 miles
Prince Arthur Road IBC	Prince Arthur Road, Gillingham ME7 1UR	3 miles
Royal Tunbridge Wells IBC	High Woods Lane, Tunbridge Wells TN2 4TU	3 miles
Sevenoaks IBC	Hollybush Close, Sevenoaks TN13 3UX	2 miles
White Oak IBC	Garrold's Close, Swanley BR8 7BF	6 miles

10.7.3 Unmet demand

There is no evidence of any unmet demand in the borough.

10.8 Assessments of need in neighbouring areas

The table below summarises strategic assessments of indoor bowls needs in neighbouring areas.

Local Authority	*Facilities priorities*	*Implications for Tonbridge and Malling*
Maidstone Borough Council	The *'Maidstone Sports Facilities Strategy'* (2019) states that 'there is one 8-rink indoor bowls hall in Maidstone. There is sufficient spare capacity at the existing indoor facility to cater for all additional demand to 2031'.	There is some spare capacity to serve demand from Tonbridge and Malling.
Tunbridge Wells Borough Council	The *Tunbridge Wells Borough Indoor/Built Sports Facilities Needs Assessment 2017-2033'* (2018) concludes that there is sufficient capacity to meet current needs and that additional demand equivalent to one extra rink will be created by 2033.	There is some spare capacity to serve demand from Tonbridge and Malling.
Sevenoaks District Council	The *'Sevenoaks Sports Facilities Strategy 2016-2025'* (2017) identifies that 'currently there would appear to be sufficient indoor bowls provision, to meet demand'.	There is some spare capacity to serve demand from Tonbridge and Malling.
Gravesham Borough Council	The *'Gravesham Indoor Sports Facilities Strategy and Action Plan 2016-2026'* (2016) identified that 'there is no indoor bowls facility within Gravesham. There are, however, 10 indoor facilities supplying 75 rinks within 20 minutes' drive time of Gravesham'.	There is no capacity to meet demand from Tonbridge and Malling.
Medway Council	The *'Medway Sports Facilities Strategy and Action Plan'* (2017) concludes that 'current provision across the borough is meeting existing needs. There is no requirement to provide additional bowls provision in the borough, assuming the long-term trend for declining participation continues'.	There is some spare capacity to serve demand from Tonbridge and Malling.

10.9 Bowls England priorities

Consultation with Bowls England and the local clubs identified the following issues:

- 'We have one club in Tonbridge and Malling, with five other sites being located broadly within the now acceptable travel time of 30 Minutes, it is vital that the Club in the Tonbridge and Malling local authority area continues to operate and enable the local population to enjoy our wonderful sport'.

- 'Our Sport is popular with the older members of the population and with the projections for the 60+ population to increase between 2023 and 2042, we consider that this will enable our sport to grow to the benefit of the indoor club'.

- As a guide demand is calculated as one rink per 14,000-17,000 of total population. A six-rink green, therefore, is required for a population of 85,000-100,000.

10.10 Future demand for bowls

10.10.1 Population growth

Two scenarios are considered:

- The ONS 2018 sub-national population projections forecast a population of 153,604 by 2042, an increase of 21,404 (or 16.2%).

- Objectively assessed Local Housing Need (LHN) amounts 1,090 dwellings per year (23,544 dwellings by 2042). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 54,151 to 186,351 (or 41.0%).

10.10.2 Participation rates

- ***National bowls trends:*** Sport England's *'Active Lives'* survey has recorded adult (16+) weekly participation rates for bowls at national level since 2015:

Nov 2015-Nov 2016	*May 2016-May 2017*	*Nov 2016-Nov 2017*	*May 2017-May 2018*	*Nov 2017-Nov 2018*	*May 2018-May 2019*	*Nov 2018-Nov 2019*	*May 2019-May 2020*	*% Change*
0.8%	0.8%	0.8%	0.8%	0.7%	0.7%	0.5%	0.5%	-0.3%

- ***Local general trends:*** Sport England's *'Active Lives'* survey recorded the proportion of the adult (16+) population who are active for at least 150 minutes per week in Tonbridge and Malling between 2015 and the present. The results are tabulated below and show that whilst rates have fluctuated over the survey periods, there is a downward trend between 2015 and 2022:

Nov '15 - Nov '16	*May '16 - May '17*	*Nov '16-Nov '17*	*May '17-May '18*	*Nov '17-Nov '18*	*May '18-May '19*	*Nov '18-Nov '19*	*May '19-May '20*	*Nov '19-Nov '20*	*May '20-May '21*	*Nov '20-Nov '21*	*Nov '21-Nov '22*	*% Change*
66.3%	66.9%	66.8%	67.4%	68.8%	69.5%	69.4%	66.0%	66.0%	66.6%	65.1%	64.2%	-2.5%

10.10.3 Future projections

Sport England has developed the Sport Facility Calculator (SFC), to help to quantify how much additional demand for key community facilities like indoor bowls halls, will be generated by population increases. The SFC uses Sport England survey data on who uses facilities and applies this to the population profile of the local area. This builds up a profile of usage, which can be then applied to estimate how much demand any given population would generate. This demand is then converted into the quantity of facilities needed and expressed as rinks to define indoor bowls needs. Two population scenarios are considered:

- The ONS 2018 sub-national population projections forecast a population of 143,604 by 2042, an increase of 21,404 (or 16.2%). On this basis, there would be additional demand equivalent to 0.34 indoor bowls rinks or 0.06 of a six-rink indoor bowls facility.

- A projection based on assessed housing needs predicts a population of 186,351 by 2042, an increase of 54,161 (or 41.0%). On this basis, there would be additional demand equivalent to 0.87 indoor bowls rinks or 0.15 of a six-rink indoor bowls facility.

This increase in demand is for a small fraction of a six-rink facility and is not sufficient to justify additional provision.

10.11 Key findings on demand

The key findings are as follows:

- Expressed demand for indoor bowls in Tonbridge and Malling has fallen in recent years, reflecting a downward trend nationally.

- Peak utilisation rates at the indoor bowls facility in the borough are 80% meaning that there is limited spare capacity to accommodate additional demand.

- Population growth of 16.2% in Tonbridge and Malling by 2042 based on the lower population estimate will increase demand for indoor bowls facility capacity by a similar amount, whilst an increased population of 41.0% based on the higher estimate will increase demand for indoor bowls facility capacity by a similar amount.

10.12 The balance between indoor bowls supply and demand

Four criteria have been assessed to evaluate the balance between indoor bowls supply and demand in Tonbridge and Malling:

- ***Quantity:*** Does the facility have sufficient capacity to meet needs now and in the future?

- ***Quality:*** Is the facility fit for purpose for the users now and in the future?

- ***Accessibility:*** Is the facility in the right physical location for the users now and in the future?

- ***Availability:*** Is the facility available for those who want to use it now and in the future?

10.13 Quantity

10.13.1 Current needs

The indoor bowls facility serving Tonbridge and Malling is assessed to be operating with limited spare capacity, based upon the following evaluation:

- ***Used capacity:*** The peak usage capacity at the facility at 80% of capacity.

- ***Satisfied demand:*** There is no evidence of unmet demand in the borough.

10.13.2 Future needs

Spare capacity at the existing indoor facility should be able to accommodate all additional future demand.

10.14 Quality

10.14.1 Current quality

The quality of all aspects of the facility is at least 'good'.

10.14.2 Future quality

There will need to be continued investment in maintaining and improving the existing facility.

10.15 Accessibility

10.15.1 Current accessibility

The whole population is within 30-minutes' drive of an indoor bowls facility in the borough and/or in a neighbouring area.

10.15.2 Future accessibility

The facility will be accessible to meet the needs of the increased population by 2042.

10.16 Availability

10.16.1 Current availability

The facility is accessed by members only, but the membership rates are set at levels that are unlikely to exclude any potential users on cost grounds.

10.16.2 Future availability

It is reasonable to assume that similar arrangements for use will be offered in the future.

10.17 Contribution to shared strategic outcomes

Based upon the assessment above, the extent to which indoor bowls provision in Tonbridge and Malling contributes to the shared strategic outcomes is as follows:

- Bowls appeals to the older age groups, which creates opportunities to get older people more physically active.

- The geographical coverage of facilities in the borough and its neighbouring areas optimises accessibility.

10.18 The options for securing additional indoor bowls capacity

The options for securing indoor bowls capacity to meet current and future needs are as follows:

10.18.1 Protect

Local Plan policies for the protection of existing indoor bowls facilities will be key to securing local provision by ensuring that planning policy supports the retention of existing facilities for which existing and/or future demand has been identified, unless the loss of a facility can be justified by sustained reductions in demand or would involve its replacement with a facility of at least the equivalent size, quality and accessibility.

10.18.2 Provide

All additional demand can be accommodated by current spare capacity.

10.18.3 Enhance

Enhancing the existing indoor bowls facility by ensuring that the green and ancillary facilities receive regular maintenance and improvements will be important.

10.19 Action Plan

The table below sets out the action plan for indoor bowls facilities to guide the implementation of the Assessment.

Issues	*Action*	*Lead*	*Partners*	*Resources*	*Priority*
Protection of existing indoor bowls facilities.	Consider including a policy in the Local Plan to protect all indoor bowls facilities.	Sport England Active Kent and Medway	Planning policy team	-	High
Existing spare capacity can meet future demand by 2042.	Maintain existing facility to sustain and improve current quality.	Angel (Tonbridge) IBC	-	-	High
Maintaining the existing indoor bowls facility.	Maintain existing facility to sustain and improve current quality.	Angel (Tonbridge) IBC	-	-	High

11 GYMNASTICS FACILITIES

11.1 Introduction

This section examines the provision of gymnastics facilities in Tonbridge and Malling. Specialist gymnastics facilities are defined as permanently rigged, built facilities that cater for the needs of gymnastics and trampolining. Non-specialist facilities comprise sports halls and smaller halls that accommodate gymnastics and trampolining on a regular basis, involving the temporary installation of equipment. These needs have therefore also been reflected in the section assessing general sports hall provision.

11.2 Quantity

11.2.1 Purpose-built facilities

The following purpose-built facility in Tonbridge and Malling is used by Weald Gymnastics squads and can be used by the community on a pay and play basis. community access:

Club	*Location*	*Sub-area*
Weald Gymnastics Centre	Unit 6a, Sovereign Way, Tonbridge TN9 1RS	Tonbridge

11.2.2 Non-specialist facilities

Local clubs also use the following non-specialist facilities:

Club	*Facility*	*Location*	*Sub-area*
ASG Community Gymnastics Club	Tonbridge Grammar School sports hall	Deakin Leas, Tonbridge TN9 2JR	Tonbridge
Dharma Gym for All	Larkfield Leisure Centre sports hall	New Hythe Lane, Aylesford ME20 6RH	Mallings
Extension Gymnastics	The Angel Centre sports hall	Angel Lane, Tonbridge TN9 1SF	Tonbridge
Galaxy Stars Trampoline Club	Larkfield Leisure Centre sports hall	New Hythe Lane, Aylesford ME20 6RH	Mallings
Kings Hill Gymnastics Academy	Kings Hill Community Centre	Gibson Drive, Kings Hill ME19 4LG	Mallings
Tigers Acro	Weald of Kent Grammar School	Tudeley Lane, Tonbridge TN9 2JP	Tonbridge

11.2.3 Sub-area analysis

The distribution of specialist and non-specialist gymnastics facilities by sub-area in Tonbridge and Malling is as follows:

Sub-area	*Sub-area population 2021*	*No. facilities*	*Facilities per capita*
Tonbridge and surrounds	56,018	4	1: 14,005
Mallings and surrounds	76,182	3	1: 25,394
TONBRIDGE & MALLING	***132,200***	***7***	***1: 18,886***

11.3 Quality

The quality of facilities used by gymnastics clubs was assessed by a non-technical visual inspection during a site visit to all sites. The criteria that were assessed were as follows:

- ***The hall:*** The quality of the activity space, including lighting and storage facilities.
- ***The equipment:*** The quality of the equipment, matted areas and foam-filled pits.
- ***Changing facilities:*** The capacity, condition and fitness for purpose.
- ***Disability access:*** The extent of full disabled access to the facility, including the provision of access ramps, dedicated changing, toilets and car parking.
- ***General access:*** Parking, signage and proximity to public transport.

The criteria were rated on a five-point scale, where 5 equates to 'very good', 4 to 'good', 3 to 'average', 2 to 'poor' and 1 to 'very poor'.

Facility	*Hall*	*Equipment*	*Changing*	*Disability access*	*General access*
Weald of Kent Gymnastic Club	5	5	5	5	5
Kings Hill Community Centre	4	4	4	5	5
Larkfield Leisure Centre sports hall	4	4	5	4	5
The Angel Centre sports hall	5	4	4	3	3
Tonbridge Grammar School sports hall	4	4	4	4	4
Weald of Kent Grammar School	5	5	5	5	5

11.4 Accessibility

The 'effective catchment' for gymnastics facilities is 20 minutes driving time. The whole population of the borough is either within the catchment of a specialist facility, or a non-specialist facility that provides gymnastics.

Tonbridge and Malling - Gymnastics Centres 20 Mins Drive



10/27/2023

1:477,790

0 2.5 5 10 mi

0 4 8 16 km

- GYMNASTICS
- 20.0 Minutes
- Sub Areas - Tonbridge Surrounds and Malling Surrounds
- Tonbridge and Malling District Boundary

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11.5 Availability

11.5.1 Purpose-built facilities

Facility	*Opening hours and basis of use*	*Peak use*	*Secured access*
Weald Gymnastics Club	Mon, Tues, Thurs, Fri 4pm - 9pm Weds 5pm - 9pm Sat 8.30am - 5.30pm Members only	80%	Yes

11.5.2 Non-specialist facilities

The table below identifies the opening hours and gymnastics usage of the non-specialist facilities:

Facility	*Usage time for gymnastics*	*Secured access*
Kings Hill Community Centre	Mon - Fri 6pm - 9pm	Yes
Larkfield Leisure Centre sports hall	Mon 2pm - 3pm and 5pm - 9pm Tues 2pm - 8.30pm Weds 4pm - 6.15pm Thurs 1.30pm - 2.15pm and 4pm - 8pm Fri 10.30am - 11.30am and 4pm - 7.30pm Sat 8.30am - 1.30pm Sun 10sm - 11am	Yes
The Angel Centre sports hall	Mon 1pm - 1.45pm and 4pm - 7pm Tues 1pm - 1.45pm and 4pm - 7pm Weds 1pm - 1.45pm and 4pm - 6.15pm Thurs 1pm - 1.45pm and 4pm - 6.30pm Fri 1pm - 1.45pm and 4pm - 6.30pm Sat 8.30am - 12pm	Yes
Tonbridge Grammar School sports hall	Tues 4pm - 6pm Thurs 4pm - 6pm	Yes
Weald of Kent Grammar School	Thurs 5pm - 8pm Sat 9am - 11.15pm	Yes

11.6 Key findings on supply

The key findings are as follows:

- There is one specialist gymnastics facility in Tonbridge and Malling, plus five non-specialist halls.
- The quality of most aspects of all facilities used is rated as at least 'good'.
- The whole population of the borough is within 20 minutes' drive of at least one facility that accommodates gymnastics.

11.7 Current demand for Gymnastics

11.7.1 Expressed demand

There are seven gymnastics clubs in Tonbridge and Malling:

Facility	*Facility*	*Membership*
Weald of Kent Gymnastics Club	Weald of Kent Gymnastics Club	638
Tigers Acrobatic Gymnastics	Weald of Kent Grammar School	912
Dharma Gym for All	Larkfield Leisure Centre	125
Galaxy Stars Trampoline Club	Larkfield Leisure Centre	13
Extension Gymnastics	The Angel Centre	54
Kings Hill Gymnastics Academy	Kings Hill Community Centre	32
ASG Community Gymnastics Club	Tonbridge Grammar School	81
TOTAL	**-**	***1,855***

11.7.2 Displaced demand

The following facilities are located in adjacent local authority areas, close enough to the borough boundary to provide usage opportunities for Tonbridge and Malling residents.

Facility	*Address*	*Distance*
Tigers Acrobatic Gymnastics	Chapman Way, Tunbridge Wells TN2 3EF	4 miles
Pegasus Gymnastics	Farleigh Hill, Maidstone ME15 6RG	2 miles
Lightning School of Gymnastics	London Rd, Riverhead, Sevenoaks TN13 2DN	3 miles

11.7.3 Unmet demand

Unmet demand involves two components:

- Demand that cannot be met within a facility catchment due to excess demand for that facility.
- Demand that cannot be met because it is located outside the catchment of a facility.

There is some evidence of unmet demand for gymnastics in Tonbridge and Malling, with all clubs operating waiting lists.

11.8 Local sports participation priorities

There are no specific local sports participation priorities in Tonbridge and Malling, other than a general policy commitment to promote health and well-being through increased levels of physical activity. Gymnastics appeals to young people in particular and from that perspective it offers one option in the campaign against childhood obesity.

11.9 Assessments of need in neighbouring areas

The table below summarises strategic assessments of gymnastics needs in neighbouring areas.

Local Authority	*Facilities priorities*	*Implications for Tonbridge and Malling*
Maidstone Borough Council	The *'Maidstone Sports Facilities Strategy'* (2019) does not include an assessment of gymnastics needs.	No assessment available.
Tunbridge Wells Borough Council	The *Tunbridge Wells Borough Indoor/Built Sports Facilities Needs Assessment 2017-2033'* (2018) does not include an assessment of specialist gymnastics facilities needs.	No assessment available.

Local Authority	Facilities priorities	Implications for Tonbridge and Malling
Sevenoaks District Council	The *'Sevenoaks Sports Facilities Strategy 2016-2025'* (2017) identifies that 'there is limited provision of access to facilities within the Sevenoaks District area with all clubs having waiting lists restricting access to gymnastic activities due to the lack of time within both dedicated and non-dedicated facilities'.	There is no spare capacity to meet demand from Tonbridge and Malling.
Gravesham Borough Council	The *'Gravesham Indoor Sports Facilities Strategy and Action Plan 2016-2026'* (2016) does not include an assessment of gymnastics needs.	No assessment available.
Medway Council	The *'Medway Sports Facilities Strategy and Action Plan'* (2017) concludes that 'there are two dedicated gymnastics centres in Medway. There are significant waiting lists at all gymnastics and trampolining clubs in Medway, highlighting this demand. Additional dedicated gymnastics facilities would help to meet some of this unmet latent demand'.	There is no spare capacity to meet demand from Tonbridge and Malling.

11.10 British Gymnastics priorities

11.10.1 Strategy

Facilities priorities	Implications for Tonbridge and Malling
British Gymnastics' *'Facility Strategy 2017 - 2021'* (2017) identifies facilities options: • **Standalone dedicated facilities -** Achievable for most clubs. Can provide for participation and competition. • **Multi-venue dedicated facilities -** For large club-based organisations looking to further expand opportunities. • **Dedicated facility as part of a multi-sport venue -** Most likely to be local authority-based projects. • **Non-dedicated space as part of leisure centre -** Ideal for club delivery and mass participation activities. • **Satellite venues -** Opportunities for clubs to scale up their programmes and increase activity options. • **Non-dedicated spaces in leisure centres -** Ideal for introductory level, mass participation programmes.	There is one specialist facility in the borough.

11.10.2 Consultation with British Gymnastics

Consultation with British Gymnastics' Facilities Development Partner identified that:

- 'There is a large demand for more gymnastics opportunities and clubs all report large waiting lists. The total number of people estimated to be on waiting lists for gymnastics in 2020 was 1 million, with a further 1.9 million interested in the sport but not on a waiting list'.

- The sport is experiencing a strong recovery post covid with member numbers tracking 5% under 2019.

- 'A key part of British Gymnastics' strategy to increase participation is to support clubs moving into their own dedicated facility, offering more time and space for classes'.

- 'The main issue for gymnastics development is having access to sufficient dedicated space to enable clubs to grow and extend their programmes. The other key factor is the availability of coaches qualified at the right level'.

- 'The facility development team is available to support, develop and guide clubs, leisure providers and other partners to help achieve their facility requirements. Eligible British Gymnastics clubs are able to apply for Club Capital, a social investment impact loan. The £10m Club Capital fund offers unsecured loans of between £25,000 to £250,000 (up to £750,000 in exceptional circumstances) to enable clubs to move into new, or expand or safeguard existing, dedicated gymnastics facilities. Most loans will be over 4 years at an interest rate of 4%'.

- 'Recent developments for dedicated gymnastic provision include modular buildings and use of former retail units in town centres'.

- 'Weald of Kent GC operates from dedicated facilities, ensuring the long-term sustainability of this site is a priority'.

- 'Dharma Gym for All has indicated that it would like to develop a dedicated facility project'.

11.11 Future demand for Gymnastics

11.11.1 Population growth

Two scenarios are considered:

- The ONS 2018 sub-national population projections forecast a population of 153,604 by 2042, an increase of 21,404 (or 16.2%).

- Objectively assessed Local Housing Need (LHN) amounts 1,090 dwellings per year (23,544 dwellings by 2042). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 54,151 to 186,351 (or 41.0%).

11.11.2 Participation rates

- ***National trends:*** Sport England's *'Active Lives'* survey has recorded adult (16+) weekly participation rates for gymnastics at national level since 2015:

Nov 2015-Nov 2016	*May 2016-May 2017*	*Nov 2016-Nov 2017*	*May 2017-May 2018*	*Nov 2017-Nov 2018*	*May 2018-May 2019*	*Nov 2018-Nov 2019*	*May 2019-May 2020*	*% Change*
0.6%	0.7%	0.7%	0.6%	0.6%	0.6%	0.5%	0.5%	-0.1%

- Figures supplied by British Gymnastics suggest that participation in gymnastics is increasing, contrary to the *'Active Lives'* figures which are for adults only. British Gymnastics membership reached 390,500 in 2017 and increased by about 12% in the period 2013-17.

- ***Local trends:*** Sport England's *'Active Lives'* survey recorded the proportion of the adult (16+) population who are active for at least 150 minutes per week in Tonbridge and Malling between 2015 and the present. The results are tabulated below and show that whilst rates have fluctuated over the survey periods, there is a downward trend between 2015 and 2022:

Nov '15 - Nov '16	***May '16 - May '17***	***Nov '16- Nov '17***	***May '17- May '18***	***Nov '17- Nov '18***	***May '18- May '19***	***Nov '18- Nov '19***	***May '19- May '20***	***Nov '19- Nov '20***	***May '20- May '21***	***Nov '20- Nov '21***	***Nov '21- Nov '22***	***% Change***
66.3%	66.9%	66.8%	67.4%	68.8%	69.5%	69.4%	66.0%	66.0%	66.6%	65.1%	64.2%	-2.5%

11.11.3 Future projections

An increase of 21,404 (or 16.2%) in the Tonbridge and Malling population by 2042 will increase demand for gymnastics facilities capacity by a similar amount. Alternatively, an increase of 54,151 (or 41.0%) in the Tonbridge and Malling population by 2042 will increase demand for gymnastics facilities capacity by a similar amount. In both cases, this will require additional facilities provision.

11.12 Key findings on demand

The key findings are as follows:

- Expressed demand for gymnastics in Tonbridge and Malling is increasing but can be accommodated by current facilities supply at present.

- An increase of 21,404 (or 16.2%) in the Tonbridge and Malling population by 2042 will increase demand for gymnastics facilities capacity by a similar amount. Alternatively, an increase of 54,151 (or 41.0%) in the Tonbridge and Malling population by 2042 will increase demand for gymnastics facilities capacity by a similar amount. In both cases, this will require additional facilities provision.

11.13 The balance between gymnastics facilities supply and demand

Four criteria have been assessed to evaluate the balance between gymnastics facilities supply and demand in Tonbridge and Malling:

- ***Quantity:*** Are there enough facilities with sufficient capacity to meet needs now and in the future?

- ***Quality:*** Are the facilities fit for purpose for the users now and in the future?

- ***Accessibility:*** Are the facilities in the right physical location for the users now and in the future?

- ***Availability:*** Are the facilities available for those who want to use them now and in the future?

11.14 Quantity

11.14.1 Current needs

Current gymnastics facilities in Tonbridge and Malling are assessed to be at operating at full capacity.

11.14.2 Future needs

There will be insufficient capacity to accommodate additional future demand, based upon the following evaluation:

- ***Demand increases:*** An increase of 21,404 (or 16.2%) in the Tonbridge and Malling population by 2042 will increase demand for gymnastics facilities capacity by a similar amount. Alternatively, an increase of 54,151 (or 41.0%) in the Tonbridge and Malling population by 2042 will increase demand for gymnastics facilities capacity by a similar amount. In both cases, this will require additional facilities provision.

- ***Participation trends:*** Expressed demand for gymnastics in Tonbridge and Malling is increasing and this is likely to continue until 2042, offset slightly by the falling number of people aged under 18.

11.15 Quality

11.15.1 Current quality

All aspects of the facilities used for gymnastics in Tonbridge and Malling are rated as at least 'good' quality.

11.15.2 Future quality

It is assumed that local providers will continue to invest in maintaining and improving their facilities, so if this process can be assisted with funding from developer contributions in the future, it seems reasonable to assume that local provision will continue to be upgraded regularly.

11.16 Accessibility

11.16.1 Current accessibility

The whole population of the borough is within 20 minutes' drive of at least one facility that accommodates gymnastics.

11.16.2 Future accessibility

The current geographical spread of facilities will meet the needs of the increased population by 2044.

11.17 Availability

11.17.1 Current availability

All local clubs have membership fees that are set at reasonable rates.

11.17.2 Future availability

It is reasonable to assume that similar membership arrangements will be offered in the future. If an additional capacity is provided, the additional capacity will improve availability.

11.18 Contribution to shared strategic outcomes

Based upon the assessment above, the extent to which gymnastics facilities provision in Tonbridge and Malling contributes to the shared strategic outcomes is as follows:

- Gymnastics is most popular with younger people and early involvement in sport and physical activity can create positive early years experiences.

- Specialist facility provision is concentrated in the central part of the borough, creating an accessibility deficiency in the north and south.

11.19 The options for securing additional gymnastics facilities

The options for securing existing and additional facilities capacity for gymnastics to meet current and future needs are as follows:

11.19.1 Protect

Local Plan policies for the protection of existing facilities used for gymnastics through the Local Plan will be key to securing local provision, by ensuring that planning policy supports the retention of existing facilities for which existing and/or future demand has been identified, unless the loss of a facility would involve its replacement with a facility of at least the equivalent size, quality and accessibility.

11.19.2 Provide

There is a need to provide additional facilities capacity for gymnastics in Tonbridge and Malling by 2042. This could be met through additional specialist facilities provision, extra sports hall capacity or a combination of the two.

11.19.3 Enhance

Ensuring that existing facilities used for gymnastics receive regular maintenance and improvements will be key to maintaining capacity.

11.20 Action Plan

The table below sets out the action plan for gymnastics facilities to guide the implementation of the Assessment.

Issues	*Action*	*Lead*	*Partners*	*Resources*	*Priority*
Protection of existing specialist gymnastics facility.	Consider including a policy in the Local Plan to protect the existing specialist gymnastics facility.	Sport England Active Kent and Medway	Planning policy team	-	High
Additional gymnastics facilities capacity required to meet future needs.	Examine the feasibility of developing additional capacity through new or extended provision in the Mallings sub-area.	TMBC	Local clubs British Gymnastics	Costings unknown	High

12 POLICIES AND RECOMMENDATIONS

12.1 Introduction

This section contains policies and recommendations for the protection, enhancement and provision of sports facilities in Tonbridge and Malling.

12.2 Policy context

The recommendations made in the context of the National Planning Policy Framework (NPPF), which stipulates that existing sports facilities should not be built upon unless:

- An assessment has taken place which has clearly shown the facility to be surplus to requirements, or;
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality, in a suitable location, or;
- The development is for alternative sport and recreation provision, the needs for which clearly outweighs the loss.

12.3 Protect

12.3.1 Recommendation 1: Safeguarding existing provision

The Tonbridge and Malling Sports Facilities Strategy (SFS) comprises a robust and evidence-based assessment of current and future needs for sports facilities in the borough. The Assessment has identified a need for all current facilities to be retained, on the basis of the specific identified roles that each can play in delivering the needs of sport in the borough both now and in the future. It is therefore recommended that existing planning policies continue to support the retention of all sites, based upon the evidence in the SFS.

12.3.2 Recommendation 2: Community access to education sports facilities

A significant proportion of some types of sports facility (in particular sports halls) in Tonbridge and Malling are located on school sites. Most of these facilities are not subject to formal Community Use Agreements and external use could, therefore in theory be withdrawn at any time. Some education sports facilities have no community use at all at present, which does not optimise the use of public resources. Furthermore, the management arrangements for many school sports facilities with external use are not conducive to maximising that use. It is therefore recommended that:

- Efforts are made to secure formal Community Use Agreements at existing education sports facilities.
- Community Use Agreements become a standard condition of planning consent at all new education sports facilities, along with a design and specification that is consistent with maximising school and community use.

- Community Use Agreements become a standard condition of receiving funding from developer contributions to improve or enhance the capacity of existing sports facilities on education sites, to meet the additional demand arising from housing developments.

- Support be offered to schools with their community use management arrangements, including funding for community access improvements if feasible.

12.4 Enhance

12.4.1 Recommendation 3: Capacity improvements

Some of the current demand for sports facilities in Tonbridge and Malling can be accommodated through enhancements to existing facilities that will facilitate extra usage at existing sites. It is recommended that the site-specific action plan in the Tonbridge and Malling SFS be used as the basis for prioritising facilities enhancements that will help to alleviate the current identified and future projected deficits.

12.4.2 Recommendation 4: Developer contributions (enhancements)

Some of the additional demand that will arise from future housing development and the related population growth in Tonbridge and Malling, can be accommodated through enhancements to existing sports facilities. It is therefore recommended that:

- The action plan in the Tonbridge and Malling SFS be used as the basis for determining facility enhancements that demonstrably relate to the scale and location of specific developments.

- An appropriate level of financial contributions should then be sought under Section 106, using Sport England's Sports Facility Calculator tool, to cover the capital and revenue implications of the enhancements. This has been applied to calculate the future need for, and related costs of, additional sports halls, swimming pools and indoor bowls facilities in this strategy.

12.5 Provide

12.5.1 Recommendation 6: New sports facilities

The Tonbridge and Malling SFS considers two population growth scenarios:

- The ONS 2018 sub-national population projections forecast a population of 153,604 by 2042, an increase of 21,404 (or 16.2%).

- Objectively assessed Local Housing Need (LHN) amounts 1,090 dwellings per year (23,544 dwellings by 2042). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 54,151 to 186,351 (or 41.0%).

Whilst spare capacity in most types of sports facility can meet current and future needs to 2042, subject to maintaining the quantity quality and accessibility of existing provision, specific shortfalls identified in the Tonbridge and Malling SFS by an evidence-based needs assessment based upon the above projections, that would best be met through new provision include:

Facility type	*Current Needs*	*Future needs (lower)*	*Future needs (higher)*
Sports halls	All needs met subject to re-provision of the Angel Sports Centre sports hall	All needs met subject to re-provision of the Angel Sports Centre sports hall	All needs met subject to re-provision of the Angel Sports Centre sports hall
Swimming pools	All needs met with some programming and opening times refinements	All needs met by current spare capacity	All needs met by current spare capacity
Health and fitness	All needs met	All needs met by current spare capacity	125 extra fitness stations
Squash courts	All needs met	Additional needs met by current spare capacity	Additional needs met by current spare capacity
Indoor tennis courts	All needs met	Additional needs met by current spare capacity	Additional needs met by current spare capacity
Indoor bowls	All needs met	Additional needs met by current spare capacity	Additional needs met by current spare capacity
Gymnastics facilities	Additional capacity needed	New provision in the Mallings sub-area or extension to the existing specialist facility	New provision or extension to the existing specialist facility

12.5.2 Recommendation 7: Developer contributions (new provision)

Some of the additional demand arising from that will arise from future housing development in Tonbridge and Malling can be accommodated through the provision of new sports facilities. It is therefore recommended that:

- The action plan in the Tonbridge and Malling SFS be used as the basis for determining new facility provision that demonstrably relates to the scale and location of specific developments.

- An appropriate level of financial contributions should then be sought under Section 106, using Sport England's Sports Facility Calculator tool, to cover the capital and revenue implications of providing the facilities. This has been applied to calculate the future need for, and related costs of, additional sports halls, swimming pools and indoor bowls facilities in this strategy.

13 IMPLEMENTING AND REVIEWING THE STRATEGY

13.1 Introduction

This section identifies the applications of the Tonbridge and Malling Sports Facilities Strategy (SFS) and the mechanisms for reviewing it to ensure that it remains robust and up to date.

13.2 Assessment implementation

The success of the SFS will be determined by how it is used. While the use of the SFS should be led by Tonbridge and Malling Borough Council, its application and delivery will also be the responsibility of the other key local stakeholders including:

- ***Tonbridge and Malling Borough Council:*** The council provides the borough's leisure centres at The Angel Centre in Tonbridge, Tonbridge Swimming Pool and Larkfield Leisure Centre. The facilities are managed by TM Active, a charitable trust.

- ***Schools:*** Schools are significant sports facilities providers in the borough, although not all provision is fully community accessible. The most significant of these is Tonbridge School.

- ***Sports clubs:*** Voluntary sector sports clubs provide and run a range of mostly smaller facilities for example Snodland Community Centre.

- ***Commercial providers:*** The commercial sector provides a range of health and fitness facilities. The largest of these is the David Lloyd Club in Kings Hill.

13.3 Assessment applications

The SFS has a number of applications:

13.3.1 Sports development planning

The SFS can be applied to help:

- Highlight, justify and make the case for sports development activities with particular sports, groups and clubs by area of the borough, Tonbridge and the Mallings.

- Identify current and future trends and changes in the demand for individual sports and the facility requirements arising.

- Inform the work, strategies and plans of sporting organisations and operators active in the borough.

- Advocate the need to work with secondary education establishments to secure community use of their site(s).

- Develop and/or enhance secondary schools and academy sports facilities where they have spare capacity and/or space to expand and are well located to meet demand.

- An understanding of supply and demand to assist in temporary relocations due to major facility refurbishments.

13.3.2 Planning policy

The SFS can be applied to help:

- Inform new Local Plan policies and the Infrastructure Delivery Plan in line with the National Planning Policy Framework (NPPF).

- The implementation of local planning policies to meet the needs of the community in line with the NPPF.

13.3.3 Planning applications

The SFS can be applied to help:

- Inform the development of planning applications which affect existing and/or proposed new sports facilities provision.

- Inform pre-application discussions to ensure any subsequent planning applications maximise their benefit to sport and are developed in line with national and local planning policy.

- Sports clubs and other organisations demonstrate the strategic need for development proposals thereby potentially adding support to their application(s) and saving them resources in developing such evidence.

- Tonbridge and Malling Borough Council to assess planning applications affecting existing and/or proposed new sports facilities provision in line with national and local planning policies.

- Sport England and other parties respond to relevant planning application consultations.

The SFS can also be applied to help Tonbridge and Malling Borough Council to meet other relevant requirements of the NPPF including:

- Taking account of and supporting local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

- Delivering the social, recreational, cultural facilities and services the community needs.

- Planning positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the framework.

- Working with public health leads and health organisations to understand and take account of the health status and needs of the local population, including expected future changes, and any information about relevant barriers to improving health and well-being.

13.3.4 Planning Obligations

The SFS can be applied to help:

- Advocate the need for sports facilities provision to be taken into account when the local authority is developing and/or reviewing its approach to the CIL, s106 or anything which replaces these mechanisms.

- Provide prioritised infrastructure requirements for sports facilities provision including deliverable sport, area and site-specific projects with costings (where known).

13.3.5 Funding bids

The SFS can be applied to help:

- Provide the evidence base and strategic need to support funding bids by a range of parties to a variety of potential funding sources.

- Inform potential bidders of the likely strategic need for their project.

13.3.6 Facility and asset management

The SFS can be applied to help:

- Ensure a strategic approach is taken to the provision and management of sports facilities.

- Inform the current management, strategies and plans of sports facility providers e.g. local authorities (within the study area and neighbouring areas), leisure trusts and educational establishments, including TMBC and TM Active as the primary operator of publicly accessible indoor sports facility provision in the borough, which require investment over the lifetime of the forthcoming Local Plan.

- Help inform how sites are managed and maintained, the lessons learnt and good practice.

- Highlight the potential of asset transfers and ensure any proposed are beneficial to all parties.

- Provide additional protection for particular sites over and above planning policy, for example through deeds of dedication.

- Resolve issues around security of tenure.

13.3.7 Public health

The SFS can be applied to help:

- Understand how the community currently participates in sport, the need for sports facilities and how this may evolve.

- Raise awareness of and tackle any barriers to people maintaining and increasing their participation.

- Highlight and address any inequalities of access to provision within the study area.

- Provide evidence to help support wider health and well-being initiatives.

13.3.8 Co-ordinating resources and investment

The SFS can be applied to help:

- Raise awareness of the current resources and investment (revenue and capital) going into the management, maintenance and improvement of sports facilities provision.

- Co-ordinate the current and any future resources and investment to ensure the maximum benefit to sport and that value for money is secured.

- Ensure the current and any future resources and investment are complimentary and do not result in their inefficient use.

13.3.9 Capital programmes

The SFS can be applied to help:

- Provide the evidence base to justify the protection and investment in sports facilities provision.

- Influence the development and implementation of relevant capital programmes (e.g. school refurbishment and new build programmes).

13.4 Monitoring delivery

A process should be put in place to ensure regular monitoring of how the recommendations and action plan are being delivered. This monitoring should be led by Tonbridge and Malling Borough Council and supported by all members of, and reported back to, the steering group. Understanding and learning lessons from how the SFS has been applied should also form a key component of monitoring its delivery. The material to review should include changes in:

13.5 Keeping the Assessment robust and up-to-date

Along with ensuring that the SFS is used and applied, a process should be put in place to keep it robust and up to date. This will expand the life of the SFS providing people with the confidence to continue to both use it and attach significant value and weight to its key findings and issues, along with its recommendations and actions. Sport England advocates that the SFS should be reviewed on an annual basis from the date it is formally signed off by the steering group. This will help to maintain the momentum and commitment built up when developing the SFS. Taking into account the time to develop the SFS this should also help to ensure that the original supply and demand information is no more than two years old without being reviewed.

The annual review should consider the following:

- How the delivery of the recommendations and action plan has progressed, and any changes required to the priority afforded to each action (e.g. the priority of some may increase following the delivery of others).

- How the SFS has been applied and the lessons learnt.

- Any changes to particularly important facilities and/or sites in the area (e.g. the most used or high-quality sites for a particular sport) and other supply and demand information, what this may mean for the overall assessment work and the key findings and issues.

- Any development of a specific sport or particular format of a sport.

- Any new or emerging issues and opportunities.

- A further FPM run to take account of the growth arising from the standard method revisions introduced by the December 2024 NPPF, which was not known at the point this was undertaken to inform the strategy.

13.6 Assessment implementation

The action plans in the SFS provide a long list of prioritised actions, but many will not be applicable, appropriate or manageable to deliver initially and all are dependent upon resource availability.

Ploszajski Lynch Consulting Ltd.

Tonbridge and Malling Borough Council

Playing Pitch and Outdoor Sports Facilities Strategy

June 2025

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1 INTRODUCTION

1.1 Introduction

Tonbridge and Malling Borough Council (TMBC) appointed Ploszajski Lynch Consulting Ltd. (PLC) to produce Sports Facilities, Playing Pitch and Open Spaces Strategies for the borough. The study covers:

- Indoor sports and active recreation facilities.
- Playing pitches and outdoor sports facilities.
- Informal/casual outdoor active recreational opportunities.

This document comprises the assessment of playing pitches and outdoor sports facilities needs.

1.2 The rationale for the strategy

1.2.1 Purpose

TMBC is currently in the process of preparing a new Local Plan, which will have a time horizon of 2041. To inform the Local Plan, complement existing evidence and to help address the expectations of national legislation and policy, the Council has commissioned the preparation of a combined Open Space, Indoor and Outdoor Sport and Recreation Study. The purpose of this work is to provide the open space, playspace and recreation evidence to support the Council's emerging Local Plan, as well as provide corporate direction on the future role of its assets and leisure provision. This should be considered in the context of anticipated future growth in the borough.

1.2.2 Objectives

The objectives of the study are as follows:

- To identify opportunities for enhancing and facilitating healthy lifestyles through multi-functionality of space, the built environment, the role, design and location of future open space, playspace and recreation provision.
- To identify any specific locational requirements for each typology, aligned to the Council's emerging Local Plan and identify any strategic site opportunities.
- To review adopted local planning policy requirements, as included in the Council's Managing Development and the Environment DPD.
- To make appropriate planning policy recommendations to reflect any updated open space, sport and recreation provision standards, to inform the Local Plan and assist the Council in securing development outcomes.
- To undertake engagement with stakeholders including council officers, facility operators, Kent Sport, Fields in Trust and Sport England as appropriate throughout the preparation of the study.
- To undertake an audit of existing indoor and outdoor facilities provided by public, private, voluntary and education sectors.

- To identify within Tonbridge and the rest of the borough quantitative and qualitative deficits and surpluses, having regard to the accessibility and availability of individual facilities.
- To assess the need for existing and future facilities (both indoor and outdoor).
- To review current facility usage.
- To make recommendations to support the most efficient use and operation of TMBC sports facilities in response to user demand and ongoing budgetary pressures.

1.3 The scope of the strategy

The pitches and outdoor sports facilities included in the strategy are as follows and were selected on the basis that there is identified demand and need for each of the sports in Tonbridge and Malling:

- Football.
- Cricket.
- Rugby Union.
- Hockey.
- Bowls.
- Netball.
- Athletics.
- Baseball.
- Multi-use Games Areas (MUGAs).

2 ASSESSING PLAYING PITCH NEEDS

2.1 Introduction

This section describes the basis on which playing pitch and outdoor sports facilities needs in Tonbridge and Malling were assessed. Two different methodologies were applied:

- Sport England's *'Playing Pitch Strategy Guidance'* (2013) for football, cricket, rugby, hockey, and baseball pitches.
- Sport England's *'Assessing Needs and Opportunities Guidance'* (2014) for croquet courts, tennis courts, bowling greens, netball courts, athletics tracks and MUGAs.

2.2 Playing Pitch Methodology

2.2.1 Introduction

The methodology for the pitches follows the *'Playing Pitch Strategy Guidance'* (2013) developed by Sport England. The process involves five stages and ten steps as follows:

- **Stage A -** Prepare and tailor the approach (Step 1).
- **Stage B -** Gather information on the supply of and demand for provision (step 2 gather supply information and views and step 3 gather demand information and views).
- **Stage C -** Assess the supply and demand information and views (step 4 understand the situation at individual sites, step 5 develop the current and future pictures of provision and step 6 identify the key findings and issues).
- **Stage D -** Develop the strategy (step 7 develop the recommendations and action plan and step 8 write and adopt the strategy).
- **Stage E -** Deliver the strategy and keep it robust and up-to-date (step 9 apply and deliver the strategy and step 10 keep the strategy robust and up to date).

2.2.2 Preparing and tailoring the approach

At stage A and step 1, TMBC convened a project steering group led by officers from leisure, planning policy and administrative and property services and involved advice from Sport England and the relevant governing bodies of sport to devise:

- The vision and objectives of the review of sports facilities in the borough.
- The scope of the exercise, including the types of facilities to include, the geographical scope and the overall timeframe for the assessment.
- The local and wider strategic context.
- The project management arrangements for the study.

A project brief was produced, approved and signed-off to complete Stage A of the process.

2.2.3 Gathering supply and demand information

At stage B, steps 2 and 3, information on supply and demand was compiled. This was applied to develop a brief overview for each site, which comprises:

- A comparison between the carrying capacity of a site and how much demand currently takes place there. The carrying capacity of a site is defined as the amount of play it can

regularly accommodate over an appropriate period of time without adversely affecting its quality and use. Demand is defined in terms of the number of 'match equivalent sessions' at each site.

- An indication of the extent to which pitches and related facilities are being used during their respective peak periods.
- The key issues with and views on the provision at a site and its use.
- The site overviews identify the extent to which pitches are:
  - Being overplayed - where use exceeds the carrying capacity.
  - Being played to the level the site can sustain - where use matches the carrying capacity.
  - Potentially able to accommodate some additional play - where use falls below the carrying capacity.

2.2.4 Assessing supply and demand information

At stage C, steps 4, 5 and 6, the situation at individual sites was aggregated to identify the position at a wider geographical area, to identify the potential for excess demand at some sites to be accommodated by excess supply at others in the locality. Other factors can also be assessed such as:

- Any demand being accommodated on sites with unsecured community access.
- The impact of latent or displaced demand.
- The situation at priority sites.

This analysis then enables an assessment to be made of the adequacy of existing pitch and related facility provision.

The methodology applied to assess the additional future needs for pitches and related facilities arising from population growth also involved:

- ***Population change:*** Two scenarios are considered:
  - The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).
  - A projection based on assessed housing needs predicts a population of 168,864 by 2041, an increase of 36,664 (or 27.7%).

- ***Participation trends:*** According to Sport England's *'Active Lives'* surveys, participation at a national level in all the pitch sports has remained static or fallen in the period since 2005, in some cases by quite significant margins. This means that future increases in participation in the pitch sports cannot be assumed based upon historic trends and have therefore not been factored into projected needs.

- ***Sports development initiatives:*** A number of sports development initiatives are delivered in Tonbridge and Malling by the governing bodies of the pitch sports and their member clubs (full details are in the individual sports sections). The impact on sustained increases in participation directly attributable to these activities is unproven has therefore not been factored in to projected future needs.

- ***Changes in supply:*** Any known proposed gains or losses in pitches and related facilities provision will influence the ability to accommodate the additional demand arising from the

increased population and this has been included in the capacity assessments (full details are in the individual sports sections).

To identify the most appropriate way to meet the additional pitch and related facilities needs arising from population growth, four sequential questions were addressed:

- ***Existing deficiency or spare capacity:*** To what extent do existing pitches and related facilities have any current shortfalls or any over-supply?
- ***Additional needs:*** What additional needs will arise from population growth?
- ***Accommodating needs:*** Which needs can be met in whole or part by spare capacity in existing pitches and related facilities and which will need to be met in whole or part by new provision?
- ***Extra pitches:*** What extra pitches and related facilities of each type are required to provide for the residual unmet demand?

2.2.5 Developing the strategy

At stage D, steps 7 and 8 a strategy and action plan were developed that address:

- ***Current provision:*** The adequacy of current provision and any existing spare capacity was, adapted where appropriate to assess informal demand and facilities.
- ***Additional needs:*** Additional needs were calculated by identifying the existing Team Generation Rates in the borough, to identify the number of people that are currently required to form a team of various types in each of the pitch sports. These figures were then applied to the 2041 population projections, to calculate the gross additional team and related pitch needs arising from the additional population.
- ***Net requirements:*** The net requirement for additional provision was calculated by comparing the extra required capacity to the current spare capacity where appropriate, to identify the difference.
- ***Location of provision:*** The location of additional pitch and related facilities needs was established by comparing the respective levels of projected population growth in each part of the borough.
- ***Policies and recommendations:*** These were developed in Sport England advocated categories of 'protect', 'provide' and 'enhance'.
- ***Action plan:*** An action plan was developed for each type of pitch and facility, setting out both strategic and site specific proposals.

2.3 Outdoor Sports Facilities Methodology

The methodology applied to assess the needs and opportunities for sports facilities follows Sport England's recommended approach, advocated in *'Assessing Needs and Opportunities Guidance'* (2014). The process involves three stages as follows:

- **Stage A -** Prepare and tailor the approach.
- **Stage B -** Gather information on supply and demand.
- **Stage C -** Assessment - bringing the information together.

2.3.1 Preparing and tailoring the approach

At stage A, TMBC followed the sane process as for the Playing Pitch Strategy in devising a combined brief for the strategy.

2.3.2 Assessing sports facilities supply

At Stage B of the strategy information on supply and demand was gathered as follows:

- ***Quantity:*** Establishing what facilities there are in the borough, with details of their dimensions, technical information like playing surfaces and floodlighting. This included consideration of facilities not currently in use, those not available to the community and significant provision in neighbouring areas that serves some needs of Tonbridge and Malling residents.
- ***Quality:*** Auditing the quality of facilities. This involved assessing each facility in terms of its condition (its age, appeal, fabric and ancillary provision like changing and car parking - factors that will influence its attractiveness to users) and fitness for purpose (its technical specifications and ability to accommodate an appropriate standard of play).
- ***Accessibility:*** Determining spatial distribution of provision in the borough by GIS mapping of each facility type, including catchment analysis appropriate to the scale and role of each facility.
- ***Availability:*** Identifying how much each facility is used, whether there is any existing spare capacity and if there is any scope to increase capacity. This involved consideration of programming and usage data, opening times and pricing levels, which was secured through consultation with facility providers and operators.

The assessment of sports facilities demand involved five main elements:

- ***Local population profile:*** Establishing the local demography, including the size, age profile, affluence/deprivation, health indices and growth projections.
- ***Sports participation:*** Identifying local sports participation characteristics, through analysing the results of Sport England's *'Active Lives'* survey, local facilities usage figures and a survey of local clubs to establish membership patterns and trends.
- ***Unmet, displaced and future demand:*** In addition to current expressed demand, analysis of unmet (demand which exists but cannot currently be satisfied), displaced (demand from within the borough that is satisfied elsewhere) and future demand (based on projected population and participation increases) was identified.
- ***Local participation priorities:*** Establishing any local priorities for the use of sports facilities, such as those relating to corporate health and well-being policies.
- ***Sport-specific priorities:*** Determining through consultation with Active Kent and Medway, the governing bodies of sport and a local sports clubs survey, whether there are any sport-specific priorities for Tonbridge and Malling.

The information was collated and analysed in a stage B report, which was evaluated and approved by the project steering group.

2.3.3 Bringing the information together

At stage C of the process, the supply and demand information was brought together for each type of facility to establish:

- ***Quantity:*** Are there enough facilities with sufficient capacity to meet needs?
- ***Quality:*** Are the facilities fit for purpose for the users?
- ***Accessibility:*** Are the facilities in the right physical location for the users?
- ***Availability:*** Are the facilities available for those who want to use them?

The results of the assessment were applied to produce an assessment which included:

- ***Options for provision:*** The options for meeting current and future facilities needs were identified under Sport England's recommended headings of 'Protect', 'Provide' and 'Enhance'.
- ***Policy recommendations:*** Arranged under the headings of 'Protect', 'Provide' and 'Enhance', planning policy recommendations were developed to ensure that the implementation of the strategy will be supported by the provisions of the Local Plan.

2.4 Stakeholder consultation

Information was gathered from a wide range of consultees including: -

- ***Sport England:*** Guidance on the assessment methodology.
- ***Tonbridge and Malling Borough Council:*** Consultation with officers from planning policy and leisure.
- ***TM Active:*** Data from the leisure trust contracted to run the key council-owned facilities.
- ***Other local sports facilities providers:*** Consultation with organisations such as local sports clubs and commercial health and fitness operators on usage levels and spare capacity.
- ***Neighbouring local authorities:*** Information on their sports facilities assessments and the impact of any cross-border issues was obtained from Maidstone Borough Council, Tunbridge Wells Borough Council, Sevenoaks District Council, Gravesham Borough Council and Medway Council.
- ***Active Kent and Medway:*** Information on local and wider strategic priorities.
- ***Governing bodies of sport:*** Information on local and wider strategic priorities and local supply and demand information.
- ***Sports clubs:*** Information on sports facilities provision and use, current and future needs and opinions on quality, which was mostly submitted via an on-line survey circulated by the respective governing bodies of sport on behalf of the project team..
- ***Schools:*** Information on sports facilities provision and use, plus attitudes towards community use, which was submitted via an on-line survey.
- ***Town and parish councils:*** Information on sports facilities provision and use, current and future needs and opinions on quality, which was submitted via an on-line survey.

2.5 Summary

Assessing playing pitch needs in Tonbridge and Malling using the approach advocated by Sport England in its *'Playing Pitch Strategy Guidance'* and outdoor sports facilities using its *'Assessing Needs and Opportunities Guidance'* has ensured that the exercise is both robust and evidence-based and as a result complies with the provisions of the Government's National Planning Policy Framework.

3 THE LOCAL CONTEXT

3.1 Introduction

This section outlines the context within which playing pitch and outdoor sports facilities provision has been considered in Tonbridge and Malling.

3.2 Background

3.2.1 Location

Tonbridge and Malling borough is in north-west Kent. It occupies approximately 93 square miles covering an area from the North Downs at Burham and Snodland in the north to Tonbridge in the south. The River Medway meanders north-east through the borough towards the Medway Gap. The borough shares boundaries with Maidstone Borough Council, Tunbridge Wells Borough Council, Sevenoaks District Council, Gravesham Borough Council and Medway Council.

3.2.2 Settlement pattern

The main urban areas of the borough comprise Tonbridge, the Medway Gap (Aylesford, Ditton, Larkfield and Leybourne), Kings Hill, Snodland and the part of Walderslade that lies within the borough. Other areas that provide a range of facilities and services include Borough Green, East Peckham, Hadlow, Hildenborough and West Malling. There are also many other smaller rural settlements. Based on the 2021 census, Tonbridge and Malling comprised approximately 65% of the population within urban areas whilst the rural population comprising around 35%.

3.2.3 Landscape

Nearly three quarters of the borough lies within the Metropolitan Green Belt. where, national Green Belt policy applies. In addition, around 27% of the borough is located within a National Landscape including the Kent Downs National Landscape and to a smaller extent the High Weald National Landscape. The borough also has numerous designated biodiversity sites and areas of flood risk, all of which , constrain the location and extent of potential built development, including sports facilities.

3.2.4 Transport links

The borough has a number of important roads passing through it. There are three motorways, the M2, M20 and the M26, four major west-east roads (A20, A21, A25 and A26) and three other north-south roads (the A227, A228 and A229). Two mainline rail routes provide links with London and the Kent coast.

3.3 Demography

3.3.1 Current population

The 2021 census data for Tonbridge and Malling indicates 132,200 residents. This represents an increase of 11,400 people (9.4% growth) since the 2011 Census figure of 120,800.

3.3.2 Age structure

Analysis of the 2021 census data shows that Tonbridge and Malling has a relatively youthful age profile compared with both Kent and England. The average age of residents of the borough is 42.4 years, compared with a national average of 43.1 years.

Age	*Tonbridge and Malling No.*	*Tonbridge and Malling %*	*Kent %*	*England %*
0-15	24,854	18.8%	17.8%	18.4%
16-65	81,964	62.0%	61.8%	63.2%
65+	25,382	19.2%	20.4%	18.4%
Total	***132,200***	***100.0%***	***100.0%***	***100.0%***

3.3.3 Sub-areas

To assist with analysing provision at a more local level and in particular to assess the differential spatial impact on supply and demand for sports facilities arising from housing growth the borough has been divided into two sub-areas. These have been selected on the basis that they comprise discrete areas within which the resident population will typically look to access sports facilities locally. The sub-area ward populations are based upon ONS 2021 small-area estimates and are as follows:

Sub-area	*Wards*	*Ward Population 2021*	*Sub-area Population 2021*
Tonbridge and surrounds	Hildenborough	5,925	56,018
	Judd	6,517	
	Vauxhall	9,249	
	Cage Green and Angel	9,390	
	Higham	6,527	
	Trench	5,822	
	Bourne	5,763	
	East and West Peckham, Mereworth and Wateringbury	6,818	
The Mallings and surrounds	Pilgrims with Igtham	6,042	76,182
	Borough Green and Platt	5,975	
	East Malling, West Malling and Offham	8,641	
	Kings Hill	8,045	
	Aylesford South and Ditton	9,135	
	Birling, Leybourne and Ryarsh	6,162	
	Larkfield	9,262	
	Aylesford North and North Downs	8,512	
	Snodland West and Holborough Lakes	5,685	
	Snodland East and Ham Hill	5,665	
	Walderslade	3,056	

3.3.4 Population growth

The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%). Comparison of the 2021 census data with the 2018 sub-national population projections for 2041 shows that the percentage of people aged under 65 will fall from 80.8% to 75.9%, with proportionate population increase amongst those aged over 65.

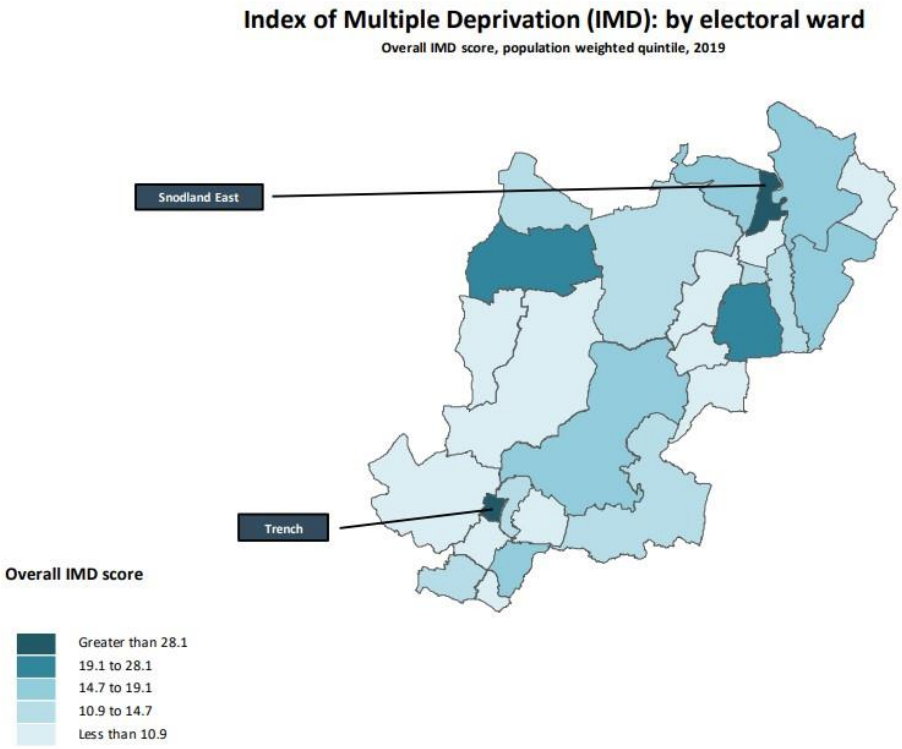
Age	Population 2021	% 2021	Population 2041	% 2041
0-15	24,854	18.8%	28,419	18.6%
16-65	81,964	62.0%	87,658	57.3%
65+	25,382	19.2%	36,782	24.1%
Total	***132,200***	***100.0%***	***152,859***	***100.0%***

3.3.5 Housing needs

The location of population growth will be determined to a large extent by housing development allocations. Objectively assessed housing need amounts 839 dwellings per year (15,941 dwellings by 2041). The precise location of development will be determined by the Local Plan, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664, which is significantly more than the ONS projection of 20,659 up to 2041.

3.3.6 Deprivation

The English Indices of Deprivation (2019) show that the borough is ranked 236 out of 317 local authority areas in England on a range of deprivation issues. Although no areas of Tonbridge and Malling are ranked as amongst the 10% most deprived in the country, the borough has experienced the largest increase in deprivation relative to other areas of Kent in the period since 2015. 9.6% of children in the borough (2,539 people) live in absolute low-income families, whilst a further 13.1% of children (3,469) live in relative low-income families. Variations in deprivation by ward in 2019 are shown in the map below, although some ward boundaries have subsequently changed:



3.3.7 Ethnicity

According to the 2021 census, the population in Tonbridge and Malling is predominantly white (93.3%), with non-white minorities representing the remaining 6.7% of the population, well below the England average of 14.6%.

3.3.8 Health

Local health indices recorded in Public Health England's *'Health Profile for Tonbridge and Malling'* (2019) show that in general the health of people in the borough is around the average for England as a whole, although:

- Life expectancy is 5.1 years lower for men and 5.6 years lower for women in the most deprived areas of the borough than in the least deprived areas.
- The prevalence of obese children aged 10-11 years is 17.4%, compared with 20.0% in the south-east region and 23.4% nationally.
- 63.3% of the adult population of the borough is classified as overweight or obese, compared with 62.7% in the south-east region and 63.8% nationally.

3.4 Sport and physical activity

3.4.1 Participation rates

Sport England's *'Active Lives'* survey measures physical activity rates amongst people aged 16 and over at district, county, regional and national levels. The definitions used in the survey are as follows:

- ***Sport and physical activity:*** This includes at least 10-minutes of moderate or higher intensity sports activities, walking and cycling for leisure or travel, fitness and dance.
- ***Active:*** The 'Active' population is defined as those doing at least 150 minutes of the above activities per week.
- ***Fairly active:*** The 'Fairly active' population is defined as those doing between 30 and 149 minutes of the above activities per week.
- ***Inactive:*** The 'Inactive' population is defined as those doing 30 minutes or less of the above activities per week.

The proportion of the adult (16+) population who are active for at least 150 minutes per week in Tonbridge and Malling between 2015 and 2022 is tabulated below and shows that whilst rates have fluctuated over the survey periods, there is a slight downward trend between 2015 and 2022, primarily due to the effects of the covid pandemic:

Nov '15 - Nov '16	*May '16 - May '17*	*Nov '16- Nov '17*	*May '17- May '18*	*Nov '17- Nov '18*	*May '18- May '19*	*Nov '18- Nov '19*	*May '19- May '20*	*Nov '19- Nov '20*	*May '20- May '21*	*Nov '20- Nov '21*	*Nov '21- Nov '22*	*% Change*
66.3%	66.9%	66.8%	67.4%	68.8%	69.5%	69.4%	66.0%	66.0%	66.6%	65.1%	64.2%	-2.5%

In comparative terms, the most recent activity levels are above the county and national figures, but below the regional average:

Area	Active	Fairly active	Inactive
Tonbridge and Malling	64.2%	13.1%	22.7%
Kent	63.5%	12.2%	24.2%
South-east England	66.5%	11.4%	22.1%
England	63.1%	11.1%	25.8%

3.4.2 Demographic variations

The *'Active Lives'* survey national level data identifies that there are significant demographic variations in participation rates:

- ***Gender:*** Men's participation rates are higher at 65% than women's at 61%.
- ***Socio-economic groups:*** Those in routine/semi-routine jobs and those who are long-term unemployed or have never worked have lower participation rates (54%) than those in professional/managerial roles (72%).
- ***Age:*** Activity levels decrease with age, from 70% in the 16 - 34 age group, to 66% on the 35 - 54 age group, 61% for 55 - 74 year olds to 40% for those aged 75 and over.
- ***Disability and long-term health conditions:*** Activity is less common for disabled people or those with a long -term health condition (47%) than those without (68%).
- ***Ethnicity:*** Participation rates are lower for minority ethnic groups than for the White population and are lowest for those of Asian heritage (54%).

3.4.3 Sports club membership

The 'Active Lives' survey also records rates of sports club membership amongst people aged 16 and over and who participated at least twice in the previous 28 days. The figures below show that rates are higher in Tonbridge and Malling than for all the wider geographical comparators:

Tonbridge and Malling	Kent	South-East	England
44.5%	38.3%	41.9%	40.2%

3.5 The local sports facilities supply network

Sports facilities provision in Tonbridge and Malling comprises a mixed economy involving the public, voluntary and commercial sectors. The key providers are as follows:

- ***Tonbridge and Malling Borough Council:*** The Council owns a range of playing pitches at Frog Bridge Sports Ground, the Racecourse Sports Ground, Swanmead Sports Ground and Tonbridge Farm. The sites are managed by TM Active, a charitable trust.
- ***Schools:*** Schools are significant pitch providers in the borough, particularly of artificial grass pitches, although not all provision is fully community accessible. The most significant of these is Tonbridge School.
- ***Town and parish councils:*** Town and parish councils are major pitch and outdoor sports facilities providers in the rural and northern parts of the borough.
- ***Sports clubs:*** Voluntary sector sports clubs provide and run a range of pitches and outdoor sports facilities.

3.6 The implications for sports facilities provision

The implications of the local context for sports facilities provision in Tonbridge and Malling are as follows:

- ***Transport links:*** The transport links, both internally and externally to the borough make pitches and outdoor sports facilities accessible to a wide catchment area, creating the potential for significant imported and exported demand.
- ***An ageing population:*** Whilst the borough has comparatively youthful age profile at present, demographic change by 2041 will see a significant increase in the proportion of people aged over 65. Since sport and physical activity rates typically decline with age, the market for local pitches and outdoor sports facilities will evolve accordingly.
- ***Deprivation:*** Although deprivation is relatively localised in the borough, consideration should be given to targeting participation initiatives in Snodland East and Trench wards in particular and ensuring that local pitch and outdoor sports facilities provision is adequate to support this.
- ***Population growth:*** The ONS 2018 sub-national population projections forecast an increase of 20,659 people by 2041, or 15.6%. If housing targets are met, population growth could be as high as 36,664 people, a 27.7% increase. This will increase demand for facilities for sport and physical activity.
- ***Overall sports participation rates:*** Local participation rates in sport and physical activity have fallen over the past five years (based upon Sport England's *'Active Lives'* survey) but are still above the respective national and county figures.
- ***Facilities supply:*** Pitches and outdoor sports facilities are provided by a range of owners and operators from the public, education and voluntary sectors, which highlights the need for and benefits of a strategic approach to co-ordinating provision.

4 STRATEGIC INFLUENCES

4.1 Introduction

As a prelude to the assessment of supply and demand for pitches and outdoor sports facilities in Tonbridge and Malling, this section reviews the relevant policies and priorities of the council and its strategic partners, to establish:

- The key relevant policies and local strategic outcomes.
- The extent to which these are convergent or divergent in respect of sport and physical activity.

4.2 Tonbridge and Malling Borough Council Corporate Strategy

4.2.1 Corporate vision

The Council's current aspirations for the borough are set out in its *'Innovation, Transformation and Delivery: Corporate Strategy 2023 - 2027* (2020). The vision of the plan is 'to be an innovative and forward-thinking council, that leads the people and businesses of the borough towards a vibrant, prosperous and sustainable future'.

4.2.2 Corporate values and priorities

To achieve this vision the Strategy sets out four priorities:

- Efficient services for all our residents, maintaining an effective council.
- Sustaining a borough which cares for the environment
- Improving housing options for local people whilst protecting our outdoor areas of importance
- Investing in our local economy to help support residents and businesses and foster sustainable growth.

The strategy states the Council's commitment to 'continue our successful management of parks, open spaces and leisure centres so the best recreational facilities are available to everyone'.

4.3 Tonbridge and Malling Borough Council Development Plan

TMBC's adopted local development plan comprises the following documents:

- Core Strategy 2006-2021 (September 2007).
- Development Land Allocations DPD (April 2008).
- Tonbridge Central Area Action Plan (April 2008).
- Managing Development and the Environment DPD (April 2010).
- Local Plan Policies Map illustrating the policies and proposals contained in the Development Plan.
- Please also see the Minerals safeguarding map for the borough that forms part of the Kent Minerals and Waste Local Plan Saved policies (April 2010).

Following the withdrawal of a Local Plan from examination in 2021, the Council has been progressing a new Local Plan. An early Regulation 18 Local Plan consultation was undertaken

in Autumn 2022 and the Council is now progressing towards a Stage 2 Regulation 18 Local Plan Consultation.

The Local Plan will be the key planning document for the borough which will provide a vision for and a range of strategic objectives for the borough covering a minimum 15-year period from adoption, a long-term spatial strategy setting out the locations for future housing and employment growth and will provide both strategic and non-strategic polices to guide development contributing to social, environmental and economic (sustainability) goals. Once adopted, the plan will replace all existing adopted plans and policies and will be used to assess and make decisions on planning applications, as well as to be used to help inform investment and the provision of infrastructure to support development, including sports provision.

4.4 Active Kent and Medway

Active Kent and Medway is the county sports partnership, one of a network of 43 active partnerships across the country. It works with sports clubs and organisations and a range of partners in the public, private and voluntary sectors to increase participation in sport and physical activity. Its strategy *'Move Together'* (2023) covers the period 2023-27. It seeks to achieve the following.

- Connecting communities - 'Making it easier for people to be active locally and using sport and physical activity's unique ability to make places better to live in and bring people together, particularly where inequalities are greatest' (page 8).
- Health and wellbeing - 'Creating partnerships that enable everyone to benefit from an active lifestyle' (page 9).
- Children and young people - 'Enabling children and young people to enjoy being active and creating the right foundations for a long, active and healthy life' (page 10).
- Supporting sport - 'Supporting local organisations to better understand their community and to deliver activities that are appropriate to people's needs and motivations' (page 11).
- Active environments - 'Creating and protecting places and spaces that make it easier for people to be active' (page 12).

4.5 Kent Joint Health and Wellbeing Strategy

The current Kent Health and Wellbeing Strategy 2018 - 2021, published by Kent County Council, has the vision 'to improve health and wellbeing outcomes, deliver better coordinated quality care, improve the public's experience of integrated health and social care services and ensure that the individual is involved and at the heart of everything we do' (page 5).

The outcomes include 'effective prevention of ill health by people taking greater responsibility for their health and wellbeing' (page 5). The Strategy states that 'shaping the physical environment of the community so that it can better promote healthier lifestyles is central to… councils' regulatory health improvement role. The new National Planning Policy Framework highlights the role of the planning system in facilitating social interaction and creating healthy, inclusive communities. This includes measures aimed at reducing health inequalities, improving access to healthy food and reducing obesity, encouraging physical activity, improving mental health and wellbeing, and improving air quality to reduce the incidence of respiratory diseases' (page 19).

4.6 The Government's Planning Policies

4.6.1 Introduction

In December 2024, the Government published an update to the 'National Planning Policy Framework' setting out its economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations.

4.6.2 Sustainable development

The purpose of the planning system is to contribute to the achievement of sustainable development. Sustainable development means development that meets the needs of the present without compromising the ability of future generations to meet their own needs' and there is a presumption in favour of sustainable development.

4.6.3 Promoting healthy and safe communities

Paragraph 96 states that 'Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:

- 'Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other - for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages.
- Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion - for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas.
- Enable and support healthy lives, through both promoting good health and preventing ill-health, especially where this would address identified local health and well-being needs and reduce health inequalities between the most and least deprived communities - for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling'.

4.6.4 Sport and leisure facilities

Paragraph 98 states that 'To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- 'Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.
- Take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.

- Ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.
- Ensure an integrated approach to considering the location of housing, economic uses and community facilities and services'.

4.6.5 Open space and recreation

Paragraph 103 states that 'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate'.

Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on unless:

- An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use'.

4.6.6 Planning Practice Guidance

The Government also issued *'Planning Practice Guidance'* . The following is of particular relevance:

- ***Open space, sport and recreation provision:*** 'Open space should be taken into account in planning for new development and considering proposals that may affect existing open space. It can provide health and recreation benefits to people living and working nearby'.
- 'Authorities and developers may refer to Sport England's guidance on how to assess the need for sports and recreation facilities. Local planning authorities are required to consult Sport England in certain cases where development affects the use of land as playing fields. Where there is no requirement to consult, local planning authorities are advised to consult Sport England in cases where development might lead to loss of, or loss of use for sport, of any major sports facility, the creation of a site for one or more playing pitches, artificial lighting of a major outdoor sports facility or a residential development of 300 dwellings or more'.
- ***Healthy and safe communities:*** 'Local planning authorities should ensure that health and wellbeing, and health infrastructure are considered in local and neighbourhood plans and in planning decision making. Development proposals should support strong, vibrant and healthy communities and help create healthy living environments which should, where possible, include making physical activity easy to do. Opportunities for healthy lifestyles must be considered (e.g. planning for an environment that supports people of all ages in making healthy choices, helps to promote active travel and physical activity and promotes high quality open spaces and opportunities for play, sport and recreation)'.

The built and natural environment have key roles in supporting and enabling, health, wellbeing, and physical activity. The Tonbridge and Malling Sports Facilities Strategy addresses the extent to which existing sports facilities and the programmes that they deliver, provide accessible and appropriate opportunities to be active and proposes recommendations where necessary.

4.7 The Government's Sports Strategy

4.7.1 Introduction

The Government's sports strategy *'Get Active - A Strategy for the Future of Sport and Physical Activity'* (2023) contains three main priorities, outlined below.

4.7.2 Driving participation and addressing inactivity

- 'Ensuring everyone is focused on increasing physical activity, meaning fewer inactive children, and narrowing the gap on inactivity where groups are not being reached, with visible progress across the country by 2030'.
- 'Setting the future direction for facilities and spaces where people can be active by delivering multi-million pound investment into grassroots facilities and setting a clear strategic ambition for the future. This will mean facilities that reflect the needs of local communities, supported by hundreds of millions of pounds of government and local authority investment'.

4.7.3 Strengthening the integrity of sport

- 'Help the sector to be welcoming to all, by promoting women's and disability sport, championing diversity across the sector and holding the sector to account for investing in these groups. This will mean groups feel the benefit of public and private investment, that we see meaningful progress by 2030, and that cultural issues which put people off sport are relentlessly tackled'.
- 'Improve how issues and concerns are dealt with in the sector, starting by launching a call for evidence around sport integrity issues. This will increase confidence in sport so that everyone knows that their welfare is at the heart of the sport system, whatever sport they play'.

4.7.4 Making sport more sustainable

- 'Supporting the sector to access additional, alternative forms of investment to help it continue to grow and thrive, and by highlighting best practice, good governance mechanisms, and opportunities offered by technology and innovation. This will allow sport to thrive for future generations and support the continuation of our sporting institutions'.
- 'Working towards a more environmentally sustainable sector that delivers on the government's net-zero ambitions. We will do this by championing the role that sport can play in sustainability, and bringing together government departments, the sport sector and subject matter experts to share information and provide support'.

4.8 Sport England Strategy

4.8.1 Vision

Sport England's strategy *'Uniting the Movement'* (2021) contains a vision for 'a nation of more equal, inclusive and connected communities. A country where people live happier, healthier and more fulfilled lives'.

4.8.2 Context

The strategy concludes that 'there are deep-rooted inequalities in sport and physical activity, which mean there are people who feel excluded from being active because the right options and opportunities are not there:

- Disabled people and people with a long-term health condition are twice as likely to be physically inactive than those without a disability or health condition.
- People from a lower socioeconomic group (NS-SEC 6-8) are more likely to be inactive than people in higher social groups.
- Women are less active than men and this gender gap starts with girls being less active from a very young age.
- People from Asian and black backgrounds are far more likely to be physically inactive than people who are white'.

4.8.3 Advocating movement, sport and physical activity

Proposed actions include:

- 'Continue to build, establish and grow partnerships and a common purpose across both the government and our sector to join up policies, strategies and approaches'.
- 'Continue to develop and deliver behavioural change campaigns, building on the success of *'This Girl Can'*, *'We Are Undefeatable'* and *'Join the Movement'*, to put movement, sport and physical activity at the forefront of national conversations'.
- 'Keep building evidence that shows the links between the issues we all care about as a nation and the value of movement, sport and physical activity as part of the solution'.
- 'Grow the extent to which we communicate, both to people and organisations, the power of getting active to help strengthen public consensus around the importance of being physically active'.

4.8.4 Five key issues

These are identified as:

- ***Recover and reinvent:*** 'Recovering from the biggest crisis in a generation and reinventing as a vibrant, relevant and sustainable network of organisations providing sport and physical activity opportunities that meet the needs of different people'.
- ***Connecting communities:*** Focusing on sport and physical activity's ability to make better places to live and bring people together.

- ***Positive experiences for children and young people:*** Unrelenting focus on positive experiences for all children and young people as the foundations for a long and healthy life.
- ***Connection with health and wellbeing:*** Strengthening the connections between sport, physical activity, health and wellbeing, so more people can feel the benefits of, and advocate for, an active life.
- ***Active environments:*** Creating and protecting the places and spaces that make it easier for people to be active.

4.8.5 Active Environments

The key proposals for facilities are contained in the 'Active Environments' theme. This identifies three types of provision:

- ***Dedicated sport and physical activity facilities:*** 'Dedicated sport and leisure facilities like leisure centres need to be co-created, well designed, supported and maintained to benefit the local community and their users'.
- ***Other community spaces:*** 'Not usually designed exclusively for exercise, and certainly not for specific sports, these places are a vital resource for many and the activity they host provides a useful income to the venue. They may never be perfect competition or training spaces, but they attract people who might never go to a sports club, leisure centre or private gym. The development of community spaces like these is important to people who are regularly or newly active'.
- ***The wider built environment:*** 'These places and spaces influence how much we move. Good design can help to increase activity levels by encouraging walking and cycling. This means connecting dedicated sport and activity facilities and community spaces, by making it easy for people to walk and cycle, by better design and by using the built and natural environments around us'.

The Tonbridge and Malling Playing Pitch Strategy will need to address the extent to existing sports facilities and the programmes that they deliver address Sport England's new strategic priorities and in particular the emphasis on non-specialist community spaces or informal facilities.

4.9 Sport England Playing Pitch Policies

By virtue of a statutory instrument made in 1996, Sport England is a statutory consultee on proposals for development which affect playing fields, land used for playing fields at any time in the last five years which remains undeveloped, or land which is identified for use as a playing field in a development plan. It considers proposals affecting playing fields in the context of the National Planning Policy Framework (in particular paragraph 103) and against its own playing fields policy which states the following: -

'Sport England will oppose the granting of planning permission for any development that would lead to the loss, or prejudice the use of:

- All or any part of a playing field, or
- Land which has been used as a playing field and remains undeveloped, or
- Land allocated for use as a playing field.

Unless in the judgement of Sport England, the development as a whole meets one of more of the following specific exceptions:

- ***Exception 1:*** A robust and up-to-date assessment has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted and the site has no special significance to the interests of sport.
- ***Exception 2:*** The proposed development is for ancillary facilities supporting the principal use of the site as a playing field and does not affect the quantity or quality of playing pitches or otherwise adversely affect their use.
- ***Exception 3:*** The proposal affects only land incapable of forming part if a playing pitch and does not:

  - Reduce the size of any playing pitch.
  - Result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas).
  - Reduce the sporting capacity of the playing field to accommodate playing pitches or the capacity to rotate or reposition pitches to maintain their quality.
  - Result in the loss of other sporting provision or ancillary facilities on the site.
  - Prejudice the use of any remaining areas of playing field on the site.

- ***Exception 4:*** The area of playing field to be lost as a result of the proposed development will be replaced prior to the commencement of the development by a new area of playing field:

  - Of equivalent or better quality.
  - Of equivalent or greater quantity.
  - In a suitable location.
  - Subject to equivalent or better accessibility and management arrangements.

- ***Exception 5:*** The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field'.

4.10 Sport England Strategic Outcomes Planning Guidance

In May 2019 Sport England supplemented its guidance on the production of sports facilities strategies by publishing *'Strategic Outcomes Planning Guidance'*. The approach advocated involves

- Developing an understanding of the wider local strategic outcomes of the study area.
- Using a cross sector approach to identify local community needs and priorities.
- Establishing the contribution that sport and physical activity can make.
- Securing stakeholder 'buy-in' to the shared local outcomes.

The aim is to ensure that the development of sports and leisure facilities is not just an end in itself but is fully integrated into the strategic objectives of a range of key stakeholders in any given area. For example, rationale for the design, siting and operation of a new swimming pool in addition to the obvious benefits for sport and physical activity, should include the role it can play in delivering objectives relating to health inequalities, economic regeneration, tourism and socio-economic deprivation.

As a prelude to the assessment of supply and demand for facilities in Tonbridge and Malling, this section reviews the relevant policies and priorities of the council and its strategic partners, to establish:

- The key relevant policies and local strategic outcomes.
- The extent to which these are convergent or divergent in respect of sport and physical activity.

A link to Sport England's Planning for Sport documentation is below:

https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport

4.11 The implications for shared strategic outcomes

4.11.1 Policy convergence

The review of strategic influences on pitch and outdoor sports facilities provision in Tonbridge and Malling identifies policy convergence on the following issues:

- ***Active, healthy communities:*** There is strong policy support for the creation of active, healthy communities, including the provision of affordable accessible facilities with appropriate activity programmes.
- ***Active design:*** Ensuring that the community provision creates opportunities for active travel and an attractive range of co-located facilities is embedded in local and wider policies.
- ***Protect and retain:*** Local and national planning policy is supportive of protecting and retaining sports facilities for which there is an assessed need.
- ***Integration with health and social care:*** Closer links with the health and social care system, to ensure that there is better integration between the needs of low participant groups and the sport and physical activity opportunities provided is a strong theme.
- ***Low participant groups:*** There is universal recognition of which groups have lower engagement with sport and physical activity and a shared policy commitment to address this.

4.11.2 Shared strategic outcomes

Based upon the shared policy influences, the shared strategic outcomes that provide the underpinning rationale for providing sports facilities in Tonbridge and Malling are as follows:

- To promote active, healthy communities in the borough, local stakeholders will support the provision of sustainable community sport and leisure facilities and the spaces and infrastructure that individuals, clubs, schools and individuals can access and use to take part.
- The network of sports facilities and supporting community infrastructure will be reviewed to ensure that the quantity, quality, accessibility and availability is appropriate to the needs of existing and prospective users.
- Closer links will be developed with the health and social care system, including the co-location of health and sports facilities where feasible and appropriate, to ensure that there is better integration between the needs of low participant groups and the sport and physical activity opportunities provided.

5 FOOTBALL PITCH NEEDS

5.1 Introduction

The key stakeholders delivering football in Tonbridge and Malling are:

- ***Kent FA:*** All football clubs in the borough affiliate to the Kent FA, which administers the game in the county.
- ***FA-affiliated clubs:*** There are 39 FA-affiliated clubs in Tonbridge and Malling, who collectively run 57 adult teams, 172 youth teams and 96 mini-soccer teams (325 teams in total).
- ***Pitch providers:*** A range of organisations provide football pitches in the borough, in particular the borough council, town and parish councils, clubs and schools.

5.2 Strategic context

5.2.1 The Football Association

'Time for Change: The FA Strategy 2020-2024' (2020) has a number of targets with important implications for football and its facilities needs at grassroots level (see box below).

- ***Equal opportunities for every girl:*** 'We will work in partnership with schools and teachers to provide tailored programmes and training. We will ensure all girls (5-16 years of age) have access to an inclusive club with an appropriate competitive pathway (including our innovative Wildcats programme)'.

- ***Deliver 5,000 quality pitches:*** 'The poor quality and availability of our pitches remains the number one frustration in grassroots football and an embarrassment for our country. Significantly improving the quality and durability of our grass pitches and building more artificial pitches is a necessity. To achieve this ambition by 2024, we will work through our delivery partner the Football Foundation, to build and improve 5,000 pitches across England, including using new digital methods to support ground staff up and down the country'.

The Football Association's *'National Facilities Strategy'* (2020) also contains a number of longer-term (10-year) facilities-related targets:

- 1,000 new '3G' football turf pitches in a mix of sizes and settings, dependent upon local needs, all aimed at enhancing the quality of the playing experience.
- 20,000 improved natural-turf pitches: to help address drop-off due to a poor playing experience.
- 1,000 new changing pavilions/clubhouses all linked to priority sites.
- Small-sided facilities to grow the small-sided game for teams and leagues, recreational and informal play.

5.2.2 The Local Football Facility Plan

The Football Association, Premier League and the Government via Sport England have produced a Local Football Facility Plan (LFFP) for each local authority area in England. The national funding partners have significantly increased investment to accelerate efforts to deliver more and better football facilities for the grassroots game. The purpose of the *'Tonbridge and Malling LFFP'* (2019) is to identify the priority projects for potential investment in the borough. All LFFPs will be refreshed by May 2025 but the key findings of the current document are below:

Overall priorities for football in Tonbridge and Malling

- Support the transition of youth teams to progress to adult male 11v11 leagues.
- Grow informal football provision.
- Ensure club structures are in place to grow in line with housing growth.
- Develop comprehensive support to volunteers to allow clubs to retain, grow and provide opportunity for all.
- Increase women and girls provision through informal ladies sessions and FA Wildcats programme.

3G' football turf pitches:

- There are currently six full-sized (11v11) '3G' football turf pitches in Tonbridge and Malling, three of which are on the FA Register of '3G pitches.
- There are two small-sided '3G' football turf pitches in the borough.
- There is a current requirement for an additional four full-sized '3G' football turf pitches in the borough. Potential sites to meet the shortfall are identified as:

  - Aylesford Recreation Ground (since provided).
  - Kings Hill Sports Park (since provided).
  - Leybourne Chase.
  - Tonbridge Farm Sports Ground.
  - Tonbridge School

Grass pitches: One priority project for potential investment was identified at the Racecourse Recreation Ground in Tonbridge.

Changing rooms/pavilions/clubhouses: Three priority projects for potential investment were identified as Frog Bridge, K-Sports (since reverted to private use) and Swanmead Sports Ground.

Small-sided facilities, parks and open green spaces: One priority project for potential investment was identified as a Multi-use Games Area at East Peckham Playing Fields.

5.2.3 Neighbouring local authorities

Football needs assessments in the neighbouring local authorities highlighted the following cross-boundary issues:

Maidstone

- The *'Maidstone Pitch Strategy'* (2019) identifies that there is a deficit of all types of grass football pitch with the exception of mini 5v5.

- The *'Maidstone Football Facility Plan'* (2020) notes a shortfall of two '3G' football turf pitches. Nine sites have been prioritised for grass pitch improvements three of which are proposed in locations that are close to the boundary with Tonbridge and Malling.

Tunbridge Wells

- The *'Tunbridge Wells Playing Pitch strategy 2017 - 2033'* (2017) identifies that there is a deficit of youth 11v11 and youth 9v9 grass pitches and a need for an additional five full-sized '3G' football turf pitches.

- The *'Tunbridge Wells Local Football Facility Plan'* (2020) notes a shortfall of four '3G' football turf pitches all of which are proposed in locations that are close to the boundary with Tonbridge and Malling. Nine sites have been prioritised for grass pitch improvements seven of which are close to the boundary with Tonbridge and Malling.

Sevenoaks

- The *'Sevenoaks Playing Pitch Strategy'* (2018) (currently being revised) concludes 'there is currently a small over-supply for grass football pitches', but a deficit of five full-sized '3G' football turf pitches.

- The *'Sevenoaks Local Football Facility Plan'* (2019) notes a shortfall of five '3G' football turf pitches, none of which of which are proposed in locations that are close to the boundary with Tonbridge and Malling. Five sites have been prioritised for grass pitch improvements, three of which are close to the boundary with Tonbridge and Malling.

Gravesham

- The *'Gravesham Playing Pitch Strategy'* (2016) identifies that there is spare capacity for all types of grass football pitch.

- The *'Gravesham Local Football Facility Plan'* (2020) notes a shortfall of two '3G' football turf pitches, neither of which is proposed in locations that are. Five sites have been prioritised for grass pitch improvements one of which is close to the boundary with Tonbridge and Malling.

Medway

- The *'Medway Playing Pitch Strategy'* (2019) concluded that there is spare capacity for all types of grass football pitch to meet current needs, but that a deficit is forecast for future needs, based on projected population growth.

- The *'Medway Local Football Facility Plan'* (2019) notes a shortfall of six full-sized '3G' football turf pitches, with one proposed location close to the boundary of Tonbridge and Malling. 13 sites have been prioritised for grass pitch improvements including three that are close to the boundary with Tonbridge and Malling.

5.2.4 Implications of the strategic context

The implications of the strategic context for football in Tonbridge and Malling are as follows:

- ***'3G' pitches:*** The increased dependence on '3G' football turf pitches for youth football and mini-soccer matches will place stresses on existing provision in the borough.
- ***Neighbouring areas:*** There is some evidence of deficiencies in pitch provision in neighbouring areas which are likely to impact on Tonbridge and Malling.

5.3 Football pitch demand in Tonbridge and Malling

5.3.1 Expressed demand

A questionnaire survey was circulated to all FA-affiliated football clubs in Tonbridge and Malling. The following 20 clubs responded, collectively representing 331 teams, or 76.3% of the 434 affiliated teams in the Borough.

- AFC Valour
- Aylesford FC
- Borough Green Junior FC
- Castle Colts FC
- East Malling FC
- Eccles FC
- Ide Hill FC
- Igtham FC
- Kent Football Academy
- Kings Hill FC
- Larkfield FC
- London City Lionesses
- Peter's Village FC
- Real 60 FC
- Roselands FC
- Snodland Town FC
- Tonbridge Angels FC
- Tonbridge Junior FC
- Wateringbury FC
- XL FC

The following clubs affiliate to the Kent FA and play in Tonbridge and Malling in season 2023/24. Clubs based outside the borough but using Tonbridge and Malling pitches are shown in italics, as are any pitches used by Tonbridge and Malling -based clubs that are outside the borough:

Club	*Match venue(s)*	*Training venue(s)*	*Adult teams*	*Youth (11v11)*	*Youth (9v9)*	*Mini (7v7)*	*Mini (5v5)*
AFC Phoenix	Mereworth Recn. Ground	-	1	-	-	-	-
AFC Tonbridge	Tonbridge Farm	-	1	-	-	-	-
AFC Valour	East Peckham Pl. Field	-	1	-	-	-	-
Artois United FC	Tonbridge Farm	-	2	-	-	-	-
Aylesford FC	Aylesford Recn. Ground Eccles Sports Ground	Aylesford Recn. Grd. '3G'	5	12	8	11	4
Barming Youth FC	West Malling Village Hall	-	1	-	-	-	-
Borough Green Junior FC	Borough Green Rec. Grd Wrotham School '3G' Potter Mede Sports Grd. King George's Field Stone House Field	Wrotham School '3G'	1	7	5	4	4
CALM Kickabout	K-Sports '3G'	-	2	-	-	-	-
Castle Colts FC	Ditton Community Ctre. Leybourne Chase *Allington Primary School* *Palace Wood Primary Sch*. *The Orchard Ground*	*Maplesden Noakes '3G* K-sports AGP	2	12	7	5	3
Ditton Minors FC	Ditton Community Ctre. Brookfield Junior School New Road Recn. Ground Ditton Junior School Malling School	-	4	2	4	4	4
East Malling FC	Larkfield Sports Club Clare Park	-	2	-	-	-	-
Eccles FC	Eccles Sports Club	Eccles Sports Club	3	-	-	-	-
FC Ditton Vets	Ditton Community Ctre.	-	1	-	-	-	-
Greenways FC	K-Sports	-	1	-	-	-	-
HMPPS Kent and Essex	K-Sports	-	2	-	-	-	-
Ide Hill FC	Longmead Stadium	Wrotham School '3G'	6	1	1	2	1
Igtham FC	Igtham Playing Field	-	1	-	-	-	-
K-Sports FC	K-Sports	-	1	-	-	-	-
Kent County Council FC	K-Sports	-	1	-	-	-	-
Kent Football Academy	K-Sports *South Park, Maidstone* *New Line Academy '3G*	K-Sports '3G' *New Line Academy '3G*	-	1	2	-	1

Club	*Match venue(s)*	*Training venue(s)*	*Adult teams*	*Youth (11v11)*	*Youth (9v9)*	*Mini (7v7)*	*Mini (5v5)*
Kent Police	Kings Hill Sports Park	-	1	-	-	-	-
Kent Sands United FC	Kings Hill Sports Park	-	1	-	-	-	-
Kent Star Ladies FC	K-Sports	-	-	-	-	1	-
Kings Hill FC	Kings Hill Sports Park West Malling Village Hall	Kings Hill Sports Park '3G'	7	18	8	9	10
Larkfield & New Hythe FC	Larkfield Sports Club Larkfield Recn. Ground	-	4	-	-	-	-
Larkfield FC	Larkfield Sports Club Larkfield Recn. Ground	K-Sports '3G'	1	2	7	2	5
Leybourne Youth FC	Leybourne Chase	-	-	-	-	-	3
London City Lionesses	K-Sports	K-Sports '3G'	2	1	-	-	-
LUCA	Leigh Academy '3G'	-	-	2	2	2	2
Maidstone Utd. Women's FC	K-Sports	-	3	-	-	-	-
Malgo FC	K-Sports	-	1	-	-	-	-
Peter's Village FC	Peter's Village Pl. Field Mereworth Recn. Ground *Mote Park*	K-Sports '3G'	2	2	3	1	5
Pippin United FC	Clare Park	-	1	-	-	-	-
Pro Soccer Academy	Wrotham School '3G'	Wrotham School '3G'	2	-	1	-	-
Range Rovers FC	Wrotham School '3G'	-	1	-	-	-	-
Real 60 FC	Tunbury Recreation Grd.	-	-	-	-	1	5
Rondos Academy	Kings Hill Sports Park	-	-	-	5	3	4
Roselands FC	Racecourse Sports Grd.	*Mascalls School '3G'*	1	-	-	-	-
Rubicon Limerick FC	West Malling Village Hall Kings Hill Sports Park	-	2	-	-	-	-
Showcase PR FC	K-Sports	-	1	-	-	-	-
Snodland Town FC	Potyns Field Snodland Comm. Centre	Potyns Field '3G'	8	3	4	4	1
Sports Connect FC	K-Sports	-	1	-	-	-	-
The Jags FC	Eccles Recreation Grd.	-	1	-	-	-	-
Titans FC	East Peckham Pl. Field	-	1	-	-	-	-
Tonbridge Angels FC	Longmead Stadium '3G'	Longmead Stadium '3G'	6	2	-	-	-
Tonbridge Invicta JFC	Frog Bridge Racecourse Sports Grd. Swanmead Sports Ground	Tonbridge School AGP Longmead Stadium '3G' *Mascalls School '3G'*	4	1	5	5	4

Club	Match venue(s)	Training venue(s)	Adult teams	Youth (11v11)	Youth (9v9)	Mini (7v7)	Mini (5v5)
Tonbridge Junior FC	Racecourse Sports Grd. Longmead Stadium Leigh Academy '3G'	-	2	25	11	16	14
Tonbridge Potterers FC	Longmead Stadium '3G'	-	1	-	-	-	-
Wateringbury FC	Wateringbury Playing Fld.	Aylesford Recn. Grd. '3G' Kings Hill Sports Park '3G'	1	3	4	4	1
Weald Wolves FC	K-Sports	-	2	-	-	-	-
Welling Town FC	*Bauville Stadium* K-Sports	K-Sports	7	4	-	3	4
West Kingsdown FC	K-Sports	-	1	-	-	-	-
Woodlands FC	Racecourse Sports Grd.	-	1	-	-	-	-
XL FC	Kings Hill Sports Park *Star Meadow Sp. C.plex '3G'* *Woodlands Sp. Centre '3G'*	*Greenacre Academy*	2	1	1	-	-
TOTALS	***-***	***-***	***107***	***99***	***76***	***77***	***75***

Sub-area analysis: Teams are distributed by sub-area as follows:

Sub-area	Adult 11v11	Youth 11v11	Youth 9v9	Mini 7v7	Mini 5v5
Tonbridge and surrounds	19	28	16	21	18
Mallings and surrounds	88	71	60	56	57
TONBRIDGE & MALLING	***107***	***99***	***76***	***77***	***75***

The key expressed demand issues are as follows:

- ***Team numbers:*** 53 men's teams, four women's teams, 92 youth male (11v11) teams, seven youth female (11v11) teams, 64 youth male (9v9) teams, nine youth female (9v9) teams, 63 mixed mini-soccer (7v7) teams, six female mini-soccer 7v7 teams and 27 mixed mini-soccer (5v5) teams play in Tonbridge and Malling.
- 22 clubs in Tonbridge and Malling have achieved the FA's quality-assured England Football Accredited status. This is 52.4% which compares with the national average of 27%. In terms of teams, 85.8% (279 out of 325) are part of an England Football Accredited club in Tonbridge and Malling, compared with the national average of 81.1%. This means that the benefits of belonging to an accredited club with formalised safeguarding procedures and qualified coaches is enjoyed by all youth and mini-soccer players in the borough.
- ***Women and girl's football:*** Football for women and girls is relatively well-developed in Tonbridge and Malling, with four adult women's teams, seven youth 11v11 teams, nine youth 9v9 teams and six mini 7v7 teams.

- ***Disability football:*** There are currently two learning disability teams and two pan-disability football teams in the borough.

5.3.2 Expressed demand trends

Overall football participation by adults is falling across the country. The *'Active Lives'* survey shows that regular participation has fallen from 5.2% of adults in 2015/16 to 4.1% in 2019/20.

5.3.3 Displaced demand

Displaced demand relates to play by teams or other users of football pitches from within the study area which takes place outside of the area, or vice versa.

- ***Imported demand from external clubs:*** 24 teams from outside the borough play their 'home' games at pitches in Tonbridge and Malling.
- ***Exported demand from internal clubs:*** 28 teams from Tonbridge and Malling play their 'home' games at pitches outside the borough.

The net effect of displaced demand for match pitches in Tonbridge and Malling is four exported teams but exported demand for sports lit training pitches amounts to a further 36 teams.

5.3.4 Unmet demand

Unmet demand takes a number of forms:

- Teams may have access to a pitch for matches but nowhere to train or vice versa.
- Pitches of a particular size or type may be unavailable to the community.
- The poor quality and consequent limited capacity of pitches in the area and/or a lack of provision and ancillary facilities which meet a certain standard of play/league requirement.

Respondents to the clubs' survey indicated that the following additional teams could be accommodated if the quantity and quality of pitch provision was improved. The 69 additional teams would represent an increase of 15.9% from the number of existing teams.

Club	***Adult 11v11***	***Youth 11v11***	***Youth 9v9***	***Mini 7v7***	***Mini 5v5***
Aylesford FC	0	0	0	0	0
Borough Green Juniors FC	1	1	1	1	1
Castle Colts FC	0	0	0	3	2
East Malling FC	0	0	0	0	0
Eccles FC	0	0	0	0	0
Ide Hill FC	0	2	1	1	2
Igtham FC	0	0	0	0	0
Kent Football Academy	1	1	1	3	2
Kings Hill FC	0	2	2	1	2
Larkfield FC	1	2	1	1	2
London City Lionesses	0	0	0	0	0
Peter's Village FC	0	2	1	1	0
Real 60 FC	0	0	2	2	0
Roselands FC	0	0	0	0	0

Club	Adult 11v11	Youth 11v11	Youth 9v9	Mini 7v7	Mini 5v5
Snodland Town FC	0	2	2	2	2
Tonbridge Angels FC	0	0	0	0	0
Tonbidge Junior FC	1	2	2	2	2
Wateringbury FC	0	0	0	0	0
XL FC	2	3	0	0	1
TONBRIDGE & MALLING	***6***	***17***	***13***	***17***	***16***

The clubs' survey revealed clear evidence of unmet demand.

- ***Waiting list:*** Seven clubs have a membership waiting list, whilst 13 do not.
- ***Extra pitch needs:*** Eleven clubs have unmet demand for additional match pitches.
- ***Extra training needs:*** Twelve clubs have unmet demand for sports lit, all-weather pitches.

5.3.5 Latent demand

Whereas unmet demand is known to exist, latent demand is demand that evidence suggests may be generated from a population if they had access to more or better provision. Given the generally low rates of participation in Tonbridge and Malling, despite a demographic profile that is more typically associated with higher rates of sport and physical activity, it is reasonable to assume that there is some latent demand in the borough.

5.4 Football pitch supply in Tonbridge and Malling

5.4.1 Introduction

This section summarises the detail of football pitch supply in Tonbridge and Malling. The pitches included in the analysis are defined as natural or artificial turf areas permanently laid out with regulation markings, with the following dimensions as specified in:

https://www.thefa.com/get-involved/player/facility-development-and-technical-guidance

Pitch Type	Pitch length	Pitch width	Size including run-offs
Adult football	100m	64m	106m x 70m
Youth football 11v11 (U17-U18)	100m	64m	106m x 70m
Youth football 11v11 (U15-U16)	91m	55m	97m x 61m
Youth football 11v11 (U13-U14)	82m	50m	88m x 56m
Youth football 9v9 (U11-U12)	73m	46m	79m x 52m
Mini-soccer 7v7 (U9-U10)	55m	37m	61m x 43m
Mini-soccer 5v5 (U7-U8)	37m	27m	43m x 33m
'3G' Football Turf Pitch	100m	64m	106m x 70m

The categories assessed are as follows:

- Pitches available for community use and used.
- Pitches available for community use but not used.

- Pitches not available for community use.

5.4.2 Full-sized '3G' football turf pitches

There are eight full-sized '3G' football turf pitches in the borough all of which apart from Judd School are on the FA's '3G' Pitch Register so can be used for competitive play.

Site	Address	Dimensions	Sports Lit	Built	Sub-area
Aylesford FC	Forstal Road, Aylesford ME20 7AU	100m x 64m	Yes	2023	Mallings
Hugh Christie College	White Cottage Road, Tonbridge TN10 4PU	100m x 60m	No	2022	Tonbridge
Judd School	Brook Street, Tonbridge TN9 2PN	100m x 60m	Yes	2017	Tonbridge
K-Sports	Station Road, Aylesford ME20 6AU	100m x 69m	Yes	2016	Mallings
Kings Hill Sports Park	Beacon Avenue, Kings Hill ME18 4QP	106m x 70m	Yes	2013	Mallings
Leigh Academy Tonbridge	Brook Street, Tonbridge TN9 2PH	105m x 70m	Yes	2011	Tonbridge
Longmead Stadium	Darenth Avenue, Tonbridge TN10 3JF	115m x 75m	Yes	2022	Tonbridge
Wrotham School	Borough Green Road, Wrotham TN15 7RD	105m x 69m	Yes	2011	Mallings

5.4.3 Small-sided '3G' football turf pitches

The following small-sided pitches are available for community use. None of the pitches are on the FA's '3G' Pitch Register and therefore they can only be used for training purposes:

Site	Address	Dimensions	Sports Lit	Built	Sub-area
Potyns Sports Ground	Paddlesworth Road, Snodland ME6 5DN	37m x 27m	Yes	2018	Mallings

5.4.4 Other full-sized artificial turf pitches used for football

The following all-weather pitches have some football use:

Site	Address	Dimensions	Surface	Sports Lit	Built	Sub-area
K-Sports*	Station Road, Aylesford ME20 6AU	100m x 63m	Sand-dressed	Yes	2017	Mallings
Tonbridge School	London Road, Tonbridge TN10 3AD	90m x 55m	Sand-filled	Yes	2009	Tonbridge

* Following the cessation of leases and informal booking arrangements prior to the sale of the site to the London City Lionesses FC, who purchased on the basis of sole use, there is no ongoing occupation by other clubs.

5.4.5 Full-sized '3G' pitches with no community use

The following all-weather pitch is not available for community football use:

Site	Address	Dimensions	Sports Lit	Built	Sub-area
Vizards Sports Ground	Lower Haysden Lane, Tonbridge TN11 9BB	130m x 80m	Yes	2017	Tonbridge

5.4.6 Grass football pitches

Provision of grass pitches with regulation line markings and goalposts for organised football are as follows. Pitches overmarked on other pitches are shown in brackets:

- ***Available for community use and used:***

Site	Address	Adult 11v11	Youth 11v11	Youth 9v9	Mini 7v7	Mini 5v5	Sub-area
Aylesford Recreation Ground	Forstal Road, Aylesford ME20 7AU	-	2	-	1	(2)	Mallings
Brookfield Junior School	Swallow Road, Aylesford ME20 6PY	-	-	1	-	-	Mallings
Borough Green Recreation Ground	Harrison Road, Borough Green TN15 8SD	-	-	1	-	-	Mallings
Clare Park Playing Field	Mill Street, East Malling ME19 6DN	1	-	-	-	-	Mallings
Ditton Community Centre	Kiln Barn Road, Ditton ME20 6AH	2	2	-	-	-	Mallings
Ditton Junior School	New Road, Ditton ME20 6AE	-	-	-	1	-	Mallings
East Peckham Playing Field	Pippin Road, East Peckham TN12 5BT	3	-	-	-	-	Tonbridge
Eccles Sports Club	Bull Lane, Eccles ME20 7HF	2	-	-	-	-	Mallings
Eccles Sports Ground	Bull Lane, Eccles ME20 7HF	-	-	2	-	-	Mallings
Frog Bridge	Whistler Road, Tonbridge TN10 4RQ	-	1	(1)	2	-	Tonbridge
Igtham Playing Field	Sevenoaks Road, Igtham TN15 9AD	1	-	-	-	-	Mallings
K-Sports*	Station Road, Aylesford ME20 2AU	2	2	1	1	1	Mallings

Following the cessation of leases and informal booking arrangements prior to the sale of the site to the London City Lionesses FC, who purchased on the basis of sole use, there is no ongoing occupation by other clubs.

Site	Address	Adult 11v11	Youth 11v11	Youth 9v9	Mini 7v7	Mini 5v5	Sub-area
King George's Field	Maidstone Road, Platt TN15 8JE	-	1	-	-	-	Mallings
Kings Hill Sports Park	Beacon Avenue, Kings Hill ME18 4QP	3	-	2(1)	1(3)	(5)	Mallings
Larkfield Recreation Ground	New Hythe Lane, Larkfield ME20 6PT	-	2	1(1)	1(1)	1(2)	Mallings
Larkfield Sports Club	New Hythe Lane, Larkfield ME20 6PU	1	-	-	-	-	Mallings
Leybourne Chase	Bannister Way, Leybourne ME19 5GQ	-	2	1	-	2	Mallings
Malling School	Beech Road, West Malling ME19 6DH	1	-	1	-	-	Mallings
Mereworth Recreation Ground	The Street, Mereworth ME18 5LU	1	-	(1)	-	-	Mallings
New Road Recreation Ground	New Road, Aylesford ME20 6AD	-	1	-	-	-	Mallings
Peter's Village Playing Field	Village Road, Wouldham, ME1 3XJ	2	-	(1)	(1)	(1)	Mallings
Potter Mede Sports Ground	Borough Green Road, Borough Green TN15 7RD	-	1	1	-	-	Mallings
Potyns Field	Paddlesworth Road, Snodland ME6 5DN	1	-	1	(1)	-	Mallings
Racecourse Sports Ground	The Slade, Tonbridge TN9 1HR	5	4	2	3	3	Tonbridge
Snodland Community Centre	Cemetery Road, Snodland ME6 5BF	3	-	2	2	-	Mallings
Stone House Field	Stone House Farm, Platt TN15 8LF	-	1	-	-	-	Mallings
Swanmead Sports Ground	Swanmead Way, Tonbridge TN9 1PP	1	-	-	2(1)	2	Tonbridge
Tonbridge Farm	Darenth Avenue, Tonbridge TN10 3JF	6	-	-	1	-	Tonbridge
Tunbury Recreation Ground	Fernbank Road, Bluebell Hill ME5 9NH	-	-	-	-	2	Mallings
Wateringbury Playing Field	Fields Lane, Wateringbury ME18 5RS	1	-	1	2	2	Mallings
West Malling Village Hall	Norman Road, West Malling ME19 6RW	1	-	-	-	-	Mallings
TOTALS	***-***	***37***	***19***	***17(5)***	***17(7)***	***13(10)***	***-***

- ***Available for community use and not used:***

Site	Address	Adult 11v11	Youth 11v11	Youth 9v9	Mini 7v7	Mini 5v5	Sub-area
Addington Recreation Ground	Park Road, Addington ME19 5BQ	1	-	-	-	-	Mallings

Site	Address	Adult 11v11	Youth 11v11	Youth 9v9	Mini 7v7	Mini 5v5	Sub-area
Bluebell Hill Recreation Ground	Common Road, Bluebell Hill ME5 9QJ	1	-	-	-	-	Mallings
Burham Recreation Ground	Rochester Road, Burham ME1 3SF	1	1	-	-	-	Mallings
Ferryfield Recreation Ground	Medway Court, Aylesford ME20 7QN	-	1	-	-	-	Mallings
Old London Road Recreation Ground	Old London Road, Wrotham TN17 7DL	1	-	-	-	-	Mallings
Ryarsh Playing Field	Birling Road, Ryarsh ME19 5LS	1	2	-	-	-	Mallings
Wouldham Recreation Ground	Knowle Road, Wouldham ME1 3XA	1	1	-	1	-	Mallings
TOTALS	***-***	***6***	***5***	***0***	***1***	***0***	***-***

- ***Pitches not available for community use:*** The following grass pitches on school sites are not available for community use:

Site	Address	Adult 11v11	Youth 11v11	Youth 9v9	Mini 7v7	Mini 5v5	Sub-area
Aylesford School	Teapot Lane, Aylesford ME20 7JU	1	1	-	-	-	Mallings
Bishop Chavasse Primary School	Baker Lane, Tonbridge TN11 0FB	-	-	-	1	-	Tonbridge
Borough Green Primary School	School Approach, Borough Green TN15 8JZ	-	1	-	1	-	Mallings
Burham Primary School	Bell Lane, Burham ME1 3SY	-	-	1	1	-	Mallings
Cage Green Primary School	Cage Green Road, Tonbridge TN10 4PT	-	-	1	2	-	Tonbridge
East Peckham Primary School	Pound Road, East Peckham TN12 5LH	-	1	-	-	-	Tonbridge
Hadlow College	Tonbridge Road, Hadlow TN11 0AL	3	-	-	-	-	Tonbridge
Hadlow Primary School	School Lane, Hadlow TN11 0EH	-	-	-	1	-	Tonbridge
Hilden Grange School	Dry Hill Park Road, Tonbridge TN10 3BX	-	5	-	-	-	Tonbridge
Hillview School for Girls	Brionne Gardens, Tonbridge TN9 2HE	-	1	-	-	-	Tonbridge
Homesdale School	Malling Road, Snodland ME6 5HS	2	1	-	-	-	Mallings
Hugh Christie College	White Cottage Road, Tonbridge TN10 4PU	1	-	-	-	-	Tonbridge
Kings Hill School	Crispin Way, Kings Hill ME19 4LS	-	-	-	2	-	Mallings
Leigh Academy	Brook Street, Tonbridge TN9 2PH	1	-	-	-	-	Tonbridge
Leybourne Primary School	Rectory Lane North, Leybourne ME19 5HD	-	-	-	1	-	Mallings

Site	Address	Adult 11v11	Youth 11v11	Youth 9v9	Mini 7v7	Mini 5v5	Sub-area
Longmead Primary School	Waveney Road, Tonbridge TN10 3JU	-	-	1	1	1	Tonbridge
Lunsford Primary School	Swallow Way, Larkfield ME20 6PY	-	-	1	1	2	Mallings
Mereworth Primary School	The Street, Mereworth ME18 5ND	-	-	1	1	-	Mallings
More Park Primary School	Luck's Hill, West Malling ME19 6HN	-	-	-	1	-	Mallings
Offham Primary School	Church Road, Offham ME19 5NX	-	-	-	1	-	Mallings
Platt Primary School	Maidstone Road, Platt TN15 8JY	-	-	-	2	-	Mallings
Plaxtol Primary School	School Lane, Plaxtol TN15 0QD	-	-	-	1	-	Mallings
Royal Rise Primary School	Royal Rise, Tonbridge TN9 2DQ	-	-	-	1	-	Tonbridge
Ryarsh Primary School	Birling Road, Ryarsh ME19 5LS	-	-	1	2	2	Mallings
Shipbourne Primary School	Stumble Hill, Shipbourne TN11 9PB	-	-	-	1	-	Tonbridge
Slade Primary School	The Slade, Tonbridge TN9 1HR	-	-	-	2	-	Tonbridge
Snodland Primary School	Roberts Road, Snodland ME6 5HL	-	-	-	1	-	Mallings
St. James the Great Academy	Chapman Way, East Malling ME19 6SD	-	-	1	2	2	Mallings
St. Katherine's School	St Katherine's Lane, Snodland ME6 5EJ	-	1	-	-	-	Mallings
St. Margaret Clitheroe Prim Sch	Trench Road, Tonbridge TN11 9NG	-	-	2	2	2	Tonbridge
St. Mark's Prim Sch	Eccles ME20 7HS	-	-	1	1	-	Mallings
Stocks Green Primary School	Leigh Road, Hildenborough TN11 9AE	-	-	2	2	-	Tonbridge
The Discovery School	Discovery Drive, West Malling ME19 4GJ	-	-	-	2	-	Mallings
Tonbridge School	London Road, Tonbridge TN10 3AD	11	-	-	-	-	Tonbridge
Trottiscliffe Primary School	Church Lane, Trottiscliffe ME19 5EB	-	-	-	2	-	Mallings
Tunbury Primary School	Tunbury Avenue, Bluebell Hill ME5 9HY	-	-	1	1	1	Mallings
Valley Invicta Primary School	Teapot Lane, Aylesford ME20 7JU	-	-	1	1	1	Mallings
Valley Invicta Primary School	Pollyfield Close, Snodland ME6 5GR	-	-	-	1	-	Mallings
Valley Invicta Primary School	Derby Drive, Leybourne ME19 5FJ	-	-	-	2	-	Mallings
Wateringbury Primary School	Bow Road, Wateringbury ME18 5EA	-	-	-	2	-	Mallings

Site	Address	Adult 11v11	Youth 11v11	Youth 9v9	Mini 7v7	Mini 5v5	Sub-area
Weald of Kent School	Tudeley Lane, Tonbridge TN9 2JP	2	-	-	-	-	Tonbridge
West Malling Primary School	Norman Road, West Malling ME19 6RL	-	-	-	1	-	Mallings
Woodlands Primary School	Higham School Road, Tonbridge TN10 4BB	-	-	-	2	-	Tonbridge
Wouldham All Saints Prim. School	Worrall Drive, Wouldham ME1 3GE	-	-	-	2	-	Mallings
Wrotham School	Borough Green Road, Wrotham TN15 7RD	2	-	-	-	-	Mallings
TOTALS	-	***23***	***11***	***14***	***49***	***13***	***-***

5.4.7 Provision by sub-area

Pitches with community use and used by sub-area are as follows. Over-marked pitches are shown in brackets:

Sub-area	'3G'	Adult 11v11	Youth 11v11	Youth 9v9	Mini 7v7	Mini 5v5
Tonbridge and surrounds	4	15	5	2(2)	6(3)	5
Malling and surrounds	8.5	22	14	15(3)	9(6)	8(10)
TONBRIDGE & MALLING	***8.5***	***37***	***19***	***17(5)***	***15(9)***	***13(10)***

5.4.8 Artificial turf pitch quality

The quality of the '3G' artificial grass pitches in the borough was assessed from site visits, to apply the Non-technical Visual Assessment criteria developed for use in conjunction with the *'Playing Pitch Strategy Guidance'*. The assessment generates an overall 'score' by evaluating the playing surface, fencing, sports lighting, disability access and changing provision. All pitches apart from Judd School are on the FA's '3G' Pitch Register so can be used for competitive play.

Site	Pitch	Changing
Aylesford FC	Good	Good
Hugh Christie College	Good*	Standard
Judd School	Good	Poor
K-Sports	Good	Standard
Kings Hill Sports Park	Good	Good
Leigh Academy Tonbridge	Good	Standard
Longmead Stadium	Good	Good
Wrotham School	Good	Standard

* No sports lights

5.4.9 Grass pitch quality

The quality of all grass football pitches in Tonbridge and Malling with community use and used was assessed from site visits during the playing season, to apply the Non-technical Visual

Assessment criteria developed by the FA for use in conjunction with the *'Playing Pitch Strategy Guidance'*. The criteria assessed are as follows. A percentage score and associated ratings are generated as an overall measure of quality:

- ***The playing surface:*** This includes grass cover, pitch dimensions, gradient, evenness, length of grass, drainage and evidence of any unauthorised use.
- ***The changing facilities:*** This includes the availability of changing rooms, kitchen and/or bar, the interior and exterior appearance, showering and toilet provision, medical room, disability access and parking arrangements.
- ***Grounds maintenance:*** This includes the frequency of grass cutting, seeding, aeration, sand-dressing, fertilising, weed killing and chain harrowing.

The ratings for each grass football pitch in Tonbridge and Malling are below. The percentage scores generated equate to ratings of 'Good' for scores of 100% - 75% (highlighted in green below), 'Standard' for scores of 74.9% - 50% (highlighted in yellow below), 'Poor' for scores of 49.9% - 25% (highlighted in red below) and 'Unsuitable' below 25%:

Site	*Pitches*	*Pitch*	*Changing*	*Comments*
Aylesford Recreation Ground	Youth 11v11 pitch 1 Youth 11v11 pitch 2 Mini 7v7 pitch (Mini 5v5 pitch 1) (Mini 5v5 pitch 2)	Good Good Good Good Good	Good	Good quality pitches and changing facilities, but inadequate parking.
Brookfield Junior School	Youth 9v9 pitch	Standard	None	Pitch at the lower end of 'Standard' quality. No changing for community users
Borough Green Recreation Ground	Youth 9v9 pitch	Standard	None	'Standard' quality pitch. No changing facilities, just toilets.
Clare Park Playing Field	Adult pitch	Standard	Standard	'Standard' quality pitch and changing facilities.
Ditton Community Centre	Adult pitch 1 Adult pitch 2 Youth 11v11 pitch 1 Youth 11v11 pitch 2	Standard Standard Standard Standard	Standard	Pitches at the upper end of 'Standard' quality, with 'Standard' changing.
Ditton Junior School	Mini 7v7 pitch	Standard	None	Pitch at the lower end of 'Standard' quality. No changing for community users
East Peckham Playing Field	Adult pitch 1 Adult pitch 2 Adult pitch 3	Standard	Good	Pitches at the lower end of 'Standard' quality, with 'Good' changing.
Eccles Sports Club	Adult pitch 1 Adult pitch 2	Standard Standard	Standard	Pitches at the upper end of 'Standard' quality, with 'Standard' changing.
Eccles Sports Ground	Youth 9v9 pitch 1 Youth 9v9 pitch 2	Poor Poor	None	'Poor' quality pitches with no on-site changing.
Frog Bridge	Youth 11v11 pitch (Youth 9v9 pitch) Mini 7v7 pitch 1 Mini 7v7 pitch 2	Standard Standard Standard Standard	Poor	Pitches at the upper end of 'Standard' quality, with 'Poor' changing.

Site	Pitches	Pitch	Changing	Comments
Igtham Playing Field	Adult pitch	Poor	Standard	'Poor' quality pitch with 'standard' changing.
K-Sports	Adult pitch 1 Adult pitch 2 Youth 11v11 pitch 1 Youth 11v11 pitch 2 Youth 9v9 pitch Mini 7v7 pitch Mini 5v5 pitch	Good Good Good Good Good Good Good	Good	'Good quality pitches and changing at the lower end of 'Good' quality.
King George's Field	Youth 11v11 pitch	Poor	Poor	'Poor' quality badly drained pitch with 'Poor' quality portacabin changing.
Kings Hill Sports Park	Adult pitch 1 Adult pitch 2 Adult pitch 3 Youth 9v9 pitch 1 Youth 9v9 pitch 2 (Youth 9v9 pitch 3) Mini 7v7 pitch 1 (Mini 7v7 pitch 2) (Mini 7v7 pitch 3) (Mini 7v7 pitch 4) (Mini 5v5 pitch 1) (Mini 5v5 pitch 2) (Mini 5v5 pitch 3) (Mini 5v5 pitch 4) (Mini 5v5 pitch 5)	Good Good Good Good Good Good Good Good Good Good Good Good Good Good Good	Good	Pitches and changing are both 'Good' quality.
Larkfield Recreation Ground	Youth 11v11 pitch 1 Youth 11v11 pitch 2 Youth 9v9 pitch 1 (Youth 9v9 pitch 2) Mini 7v7 pitch 1 (Mini 7v7 pitch 2) Mini 5v5 pitch 1 (Mini 5v5 pitch 2) (Mini 5v5 pitch 3)	Poor Poor Poor Poor Poor Poor Poor Poor Poor	None	'Poor' quality pitches. No changing facilities.
Larkfield Sports Club	Adult pitch	Good	Good	Enclosed 'Good' quality sports lit pitch and changing.
Leybourne Chase	Youth 11v11 pitch 1 Youth 11v11 pitch 2 Youth 9v9 pitch Mini 5v5 pitch 1 Mini 5v5 pitch 2	Standard Standard Standard Standard Standard	None	Pitches at the upper end of 'Standard' quality. The on-site pavilion is no longer used for changing
Malling School	Adult pitch Youth 9v9 pitch	Standard	Standard	'Standard' quality pitches and changing facilities.
Mereworth Recreation Ground	Adult pitch (Youth 9v9 pitch)	Standard Standard	Standard	Pitches at the upper end of 'Standard' quality, changing at the lower end of 'Standard'.
New Road Recreation Ground	Youth 11v11 pitch	Standard	None	Pitch at the lower end of 'Standard' quality with no on-site changing.

Site	Pitches	Pitch	Changing	Comments
Peter's Village Playing Field	Adult pitch 1 Adult pitch 2 (Youth 9v9 pitch) (Mini 7v7 pitch) (Mini 5v5 pitch)	Standard Standard Standard Standard Standard	Good	Pitches at the upper 'end' of 'Standard' quality, with 'Good' quality changing in the Community Centre.
Potter Mede Sports Ground	Youth 11v11 pitch Youth 9v9 pitch	Standard Standard	Good	'Standard' quality pitches with 'Good' changing.
Potyns Field	Adult pitch Youth 9v9 pitch (Mini 7v7 pitch)	Good Standard Standard	Good	Enclosed 'Good' quality adult pitch and changing. 'Standard' quality Youth and Mini pitch.
Racecourse Sports Ground	Adult pitch 1 Adult pitch 2 Adult pitch 3 Adult pitch 4 Adult pitch 5 Youth 11v11 pitch 1 Youth 11v11 pitch 2 Youth 11v11 pitch 3 Youth 11v11 pitch 4 Youth 9v9 pitch 1 Youth 9v9 pitch 2 Mini 7v7 pitch 1 Mini 7v7 pitch 2 Mini 7v7 pitch 3 Mini 5v5 pitch 1 Mini 5v5 pitch 2	Standard Standard Standard Standard Standard Standard Standard Standard Standard Standard Standard Standard Standard Standard Standard Standard	Standard	Pitches at the upper end of 'Standard' quality, but prone to prolonged flooding. 'Standard' quality changing.
Snodland Community Centre	Adult pitch 1 Adult pitch 2 Adult pitch 3 Youth 9v9 pitch 1 Youth 9v9 pitch 2 Mini 7v7 pitch 1 Mini 7v7 pitch 2	Standard Standard Standard Standard Standard Standard Standard	Standard	Pitches and changing at the upper end of 'Standard' quality. Location is within a deprived ward.
Stone House Field	Youth 11v11 pitch	Good	Standard	'Good' quality pitch with 'Standard' changing.
Swanmead Sports Ground	Adult pitch Mini 7v7 pitch 1 Mini 7v7 Pitch 2 (Mini 7v7 pitch 3) Mini 5v5 pitch 1 Mini 5v5 pitch 2	Standard Standard Standard Standard Standard Standard	Standard	Pitches at the upper end of 'Standard' quality, with 'Standard' changing.
Tonbridge Farm	Adult pitch 1 Adult pitch 2 Adult pitch 3 Adult pitch 4 Adult pitch 5 Adult pitch 6 Mini 7v7 pitch	Standard Standard Standard Standard Standard Standard Standard	Good	'Standard' quality pitches with 'Good' quality changing.
Tunbury Recreation Ground	Mini 5v5 pitch 1 Mini 5v5 pitch 2	Poor Poor	Poor	Badly drained 'Poor' quality pitches with 'Poor' quality changing (toilets only).

Site	Pitches	Pitch	Changing	Comments
Wateringbury Playing Field	Adult pitch Youth 9v9 pitch Mini 7v7 pitch 1 Mini 7v7 pitch 2 Mini 5v5 pitch 1 Mini 5v5 pitch 2	Poor Poor Poor Poor Poor Poor	Poor	'Poor' quality pitches and changing.
West Malling Village Hall	Adult pitch	Standard	Good	'Standard' quality pitches with 'Good' quality changing.

5.4.11 Summary of grass pitch quality

The number and percentage of pitches in each quality band is tabulated below. Just over 15% of pitches in the borough are rated as 'poor' quality, with consequent reductions in carrying capacity. Many more suffer from poor drainage and are rated at the lower end of 'standard' quality.

Pitch type	Good		Standard		Poor	
	Number	%	Number	%	Number	%
Adult 11v11	8	*22%*	27	*73%*	2	*5%*
Youth 11v11	5	*26%*	11	*58%*	3	*16%*
Youth 9v9	3(1)	*18%*	10(2)	*59%*	4(1)	*24%*
Mini-soccer 7v7	3(3)	*18%*	11(3)	*65%*	3(1)	*18%*
Mini-soccer 5v5	1(7)	*8%*	7(1)	*54%*	5(2)	*38%*
TOTAL	***20(10)***	***19%***	***66(6)***	***64%***	***17(4)***	***17%***

5.4.12 Summary of changing facilities quality

The number and percentage of pitches of each type that are served by 'poor' quality or no changing facilities is tabulated below. 21.4% of pitches are served by 'poor' quality or no changing facilities and the adverse impact on such a high proportion of pitch users makes it more difficult to recruit and retain new players, particularly women and girls.

Pitch type	Number	%
Adult 11v11	1	*3%*
Youth 11v11	7	*37%*
Youth 9v9	7 (2)	*12%*
Mini-soccer 7v7	6 (1)	*35%*
Mini-soccer 5v5	7 (2)	*54%*
TOTAL	***28(4)***	***27%***

5.4.13 Grass pitch maintenance

Football pitch maintenance in the borough is organised as follows:

- ***Club-managed pitches:*** All sites owned by football clubs maintain the pitches they use. This involves a combination of external contractors and volunteer help.
- ***Borough council-owned pitches:*** The council has a grounds maintenance contractor to undertake football pitch maintenance.
- ***Parish council-owned pitches:*** Parish councils employ grounds maintenance contractors, in some instances supported by user clubs with elements like line markings.

- ***Pitches on education sites:*** The school sites with community use all employ or contract their pitch maintenance staff.

5.4.14 Pitch hire charges

The cost of hiring grass football pitches in Tonbridge and Malling varies across the borough. For example, the most expensive adult pitch at King's Hill Sports Park is £185 per match whilst at the Racecourse it can be as low as £31 per match. Standard council pitch comparisons with other areas are as follows.

Pitch	***Cost per match (£)***
Tonbridge and Malling Borough Council	
Adult pitch	£80
Youth pitch	£50
Mini-soccer pitch	£45
Maidstone Borough Council	
Adult pitch (with changing)	£85
Adult pitch (without changing)	£65
Youth pitch (with changing)	£47
Youth pitch (without changing)	£27
Mini-soccer pitch (with changing)	£39
Mini-soccer pitch (without changing)	£19
Tonbridge Wells District Council	
Adult pitch	£90
Youth pitch	£46
Mini-Soccer pitch	£40

The cost of hiring artificial grass football pitches in Tonbridge and Malling and comparisons with other areas are as follows:

Pitch	Cost per match (£)
Tonbridge and Malling Borough Council	
Kings Hill Sports Park '3G' pitch	£152
Whole pitch	£71
One-third pitch	
Leigh Academy Tonbridge	£106
Whole pitch	£86
Two-thirds pitch	£47
One-third pitch	
Tunbridge Wells District Council	
Whole pitch (peak)	£122
Whole pitch (off-peak)	£70
Two-thirds pitch (peak)	£99
Two-thirds pitch (off-peak)	£58
One-third pitch (peak)	£68
One-third pitch (off-peak)	£40
Medway Council	
Watling Park '3G' pitch	
Whole pitch (peak)	£86
Whole pitch (off-peak)	£76
Half pitch (peak)	£55
Half pitch (off-peak)	£45

The comparison of prices shows that grass pitches in Tonbridge and Malling are slightly cheaper than those in neighbouring areas. '3G' pitch hire charges in the borough are also comparable to the surrounding areas.

5.4.15 Ownership, management and security of access

The ownership, management and security of community access of football pitch sites is detailed below. Security of access refers to the extent to which community use is protected (through public ownership, community use agreements etc.), rather than the security of tenure of specific club users.

Site	Ownership	Management	Access
Aylesford Recreation Ground	Aylesford Parish Council	Aylesford Parish Council	Secured
Brookfield Junior School	Kent County Council	Brookfield Junior School	Unsecured
Borough Green Recreation Ground	Borough Green Parish Council	Borough Green Parish Council	Secured
Clare Park Playing Field	East Malling Parish Council	East Malling Parish Council	Secured
Ditton Community Centre	Ditton Parish Council	Ditton Parish Council	Secured
Ditton Junior School	Kent County Council	Ditton Junior School	Unsecured
East Peckham Playing Field	East Peckham Parish Council	East Peckham Parish Council	Secured
Eccles Sports Club	Eccles Sports Club	Eccles Sports Club	Secured
Eccles Sports Ground	Aylesford Parish Council	Aylesford Parish Council	Secured
Frog Bridge Sports Ground	Tonbridge & Malling BC	TMActive	Secured
Igtham Playing Field	Igtham Parish Council	Igtham Parish Council	Secured

Site	Ownership	Management	Access
K-Sports	Marpaul Holdings	K-Sports	Secured
King George's Field	Platt Parish Council	Platt Parish Council	Secured
Kings Hill Sports Park	Kings Hill Parish Council	TMActive	Secured
Larkfield Recreation Ground	Larkfield Parish Council	Larkfield Parish Council	Secured
Larkfield Sports Club	Larkfield Sports Club	Larkfield Sports Club	Secured
Leybourne Chase	Leybourne Parish Council	Leybourne Parish Council	Secured
Mallings School	Mallings School	Mallings School	Unsecured
Mereworth Recreation Grd.	Mereworth Parish Council	Mereworth Parish Council	Secured
New Road Recreation Grd.	Aylesford Parish Council	Aylesford Parish Council	Secured
Peter's Village Playing Field	Trenport Developments	Trenport Developments	Secured
Potter Mede Sports Ground	Borough Green Parish Council	Borough Green Parish Council	Secured
Potyns Field	Snodland Town Council	Snodland Town Council	Secured
Racecourse Sports Ground	Tonbridge & Malling BC	TMActive	Secured
Snodland Community Centre	Snodland Community Assoc.	Snodland Community Assoc.	Secured
Stone House Field	Platt Parish Council	Platt Parish Council	Secured
Swanmead Sports Ground	Tonbridge & Malling BC	TMActive	Secured
Tonbridge Farm	Tonbridge & Malling BC	TMActive	Secured
Tunbury Recreation Ground	Aylesford Parish Council	Aylesford Parish Council	Secured
Wateringbury Playing Field	Wateringbury Parish Council	Wateringbury Parish Council	Secured
West Malling Village Hall	West Malling Parish Council	West Malling Parish Council	Secured

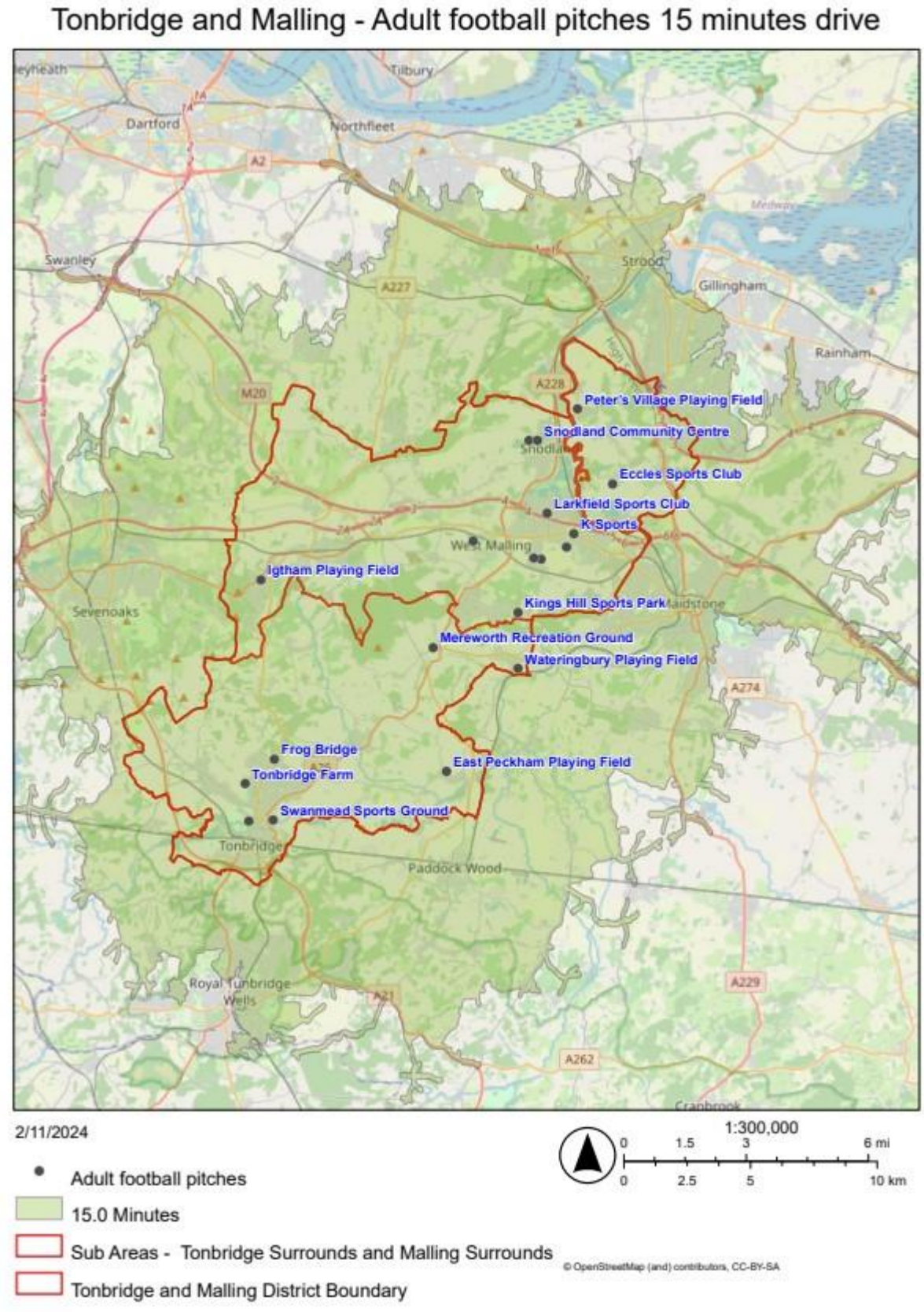
The number and proportion of football pitches in Tonbridge and Malling with community use and used that have secured access is as follows. Only 3.7% of the pitches with community use and used are on sites without secured use, meaning that in theory community use could be rescinded at any time. Measures to secure community use at education sites, such as formal Community Use Agreements, would be advisable.

Pitch Type	Secured		Unsecured	
	Number	%	Number	%
'3G' football turf pitch	7	*87.5 %*	1	*12.5%*
Adult football	37	*97.4 %*	1	*2.6%*
Youth football (11v11)	19	*100%*	0	*0.0%*
Youth football (9v9)	20	*90.9 %*	2	*9.1%*
Mini-soccer (7v7)	23	*95.8 %*	1	*4.2%*
Mini-soccer (5v5)	24	*100%*	0	*0.0%*
TOTALS	***130***	***96.3 %***	***5***	***3.7%***

5.5 Geographical distribution

The geographical distribution of football pitches in Tonbridge and Malling has been assessed by identifying catchments to illustrate local level accessibility. This is based on the results of the clubs' survey, which identifies 15-minutes travel time as the typical maximum for grass pitches and 20 minutes for full-sized '3G' football turf pitches. For all types of grass pitches and full-sized '3G' pitches, the entire local population is within the catchment of at least one pitch.

5.5.1 Adult grass pitches



5.5.2 Youth 11v11 grass pitches

Tonbridge and Malling - 11v11 Youth football pitches 15 minutes drive



2/11/2024

1:400,000

0 2 4 8 mi

0 3.25 6.5 13 km

Youth 11v11 football pitches

15.0 Minutes

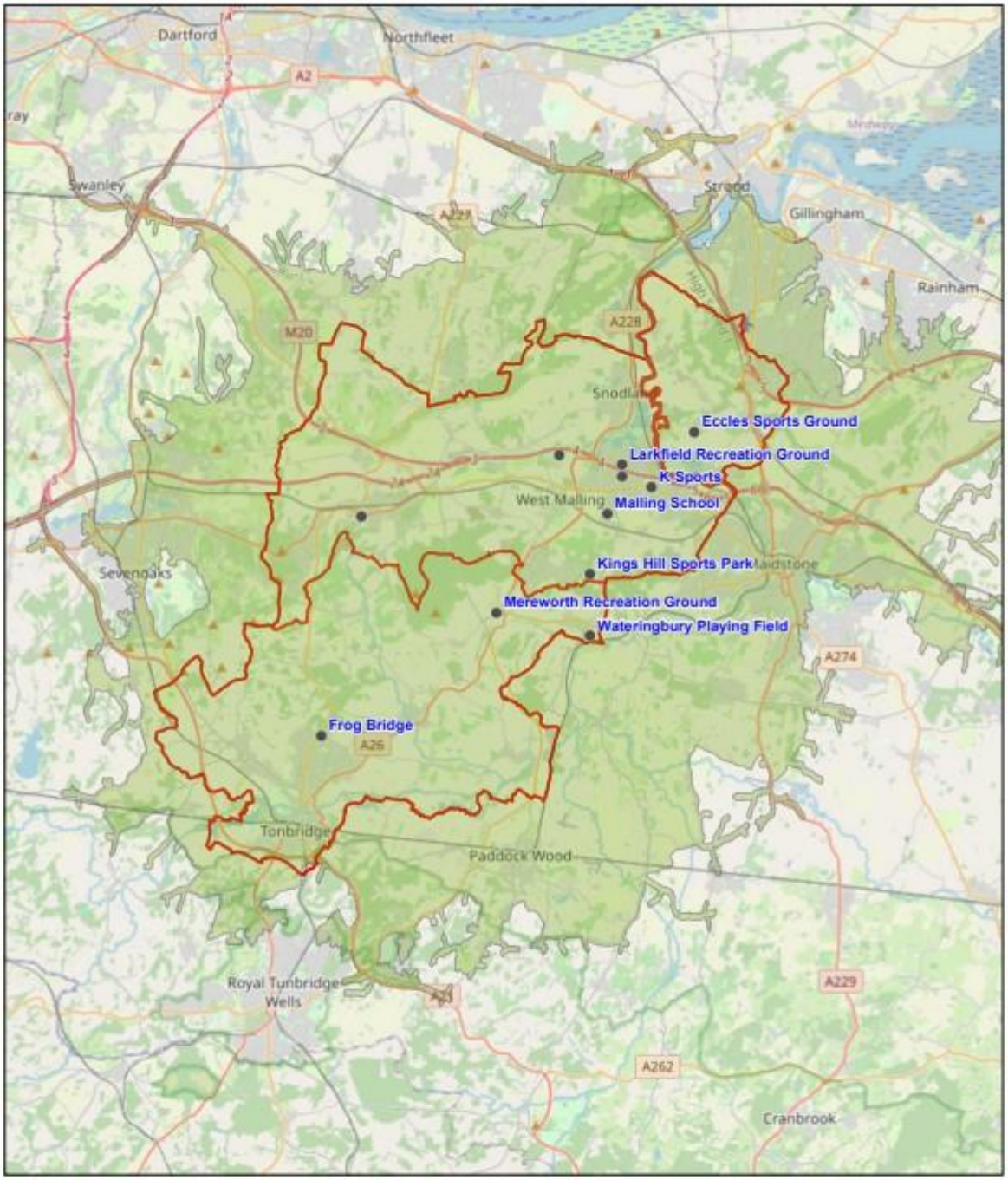
Sub Areas - Tonbridge Surrounds and Malling Surrounds

Tonbridge and Malling District Boundary

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5.5.3 Youth 9v9 grass pitches

Tonbridge and Malling - 9v9 Youth Football pitches 15 minutes drive



2/11/2024

1:300,000

0 1.5 3 6 mi

0 2.5 5 10 km

- Youth 9v9 football pitches
- 15.0 Minutes
- Sub Areas - Tonbridge Surrounds and Malling Surrounds
- Tonbridge and Malling District Boundary

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5.5.4 Mini-soccer 7v7 grass pitches



5.5.5 Mini-soccer 5v5 grass pitches

Tonbridge and Malling Mini-soccer 5v5 pitches 15 mins drive



5.5.6 Full-sized '3G' artificial grass pitches

Tonbridge and Malling - full-sized 3G football turf pitches 20 minutes drive



2/11/2024

1:400,000

0 2 4 8 mi

0 3.25 6.5 13 km

Full-sized '3G' football turf pitches

20.0 Minutes

Sub Areas - Tonbridge Surrounds and Malling Surrounds

Tonbridge and Malling District Boundary

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5.6 The views of local stakeholders

5.6.1 Kent FA

Consultation with the Kent FA highlighted that:

- ***Local Football Facility Plan:*** The LFFP was produced four years ago and will need to be reviewed soon. The document will complement and help the PPS study.
- ***Overview:*** The key strengths of local football in Tonbridge and Malling include Youth and Mini Soccer and it is recommended that this is sustained and also encouraged to grow further. It is also acknowledged that there is potential for growth in futsal. Gaps in provision do exist; these include Adult Male 11v11 teams and Informal Football sessions.
- ***Disability football:*** In Tonbridge and Malling there are four football teams/ sessions specifically for people with a disability. It is a priority of the County FA to sustain this provision. For talented players the FA runs Regional Centres and England national squads.
- ***Women and girls football:*** FA Wildcats girls football centres provide the first step on the recreational pathway, the programme provides girls aged 5-11 with regular opportunities to play football in a fun and engaging environment. Tonbridge and Malling has six FA Wildcats girls football centres and the priority is to sustain this activity. At 66**,** Tonbridge and Malling's number of female teams is comparable to local areas of a similar size. The County FA's priority is to support existing clubs to grow and encourage more clubs to develop playing opportunities for females. The local girls' league is the Kent Girls/Ladies Football League and the league is expected to grow in future years. The local adult female leagues are the Kent Girls/Ladies Football League and South-East Counties Women's League and the league is expected to grow provision in future years. For talented players, the County FA runs an Emerging Talent Centre which takes place in Tonbridge and Malling at Aylesford's new 3G pitch. Higher level talent pathway opportunities are also provided regionally and nationally by the FA, culminating in the England Women's national squads. The most local Women's Super League team is Brighton & Hove Albion Women FC which provides player pathway opportunities for gifted and talented female players and a spectator interest for fans. In the next tier down, London City Lionesses who compete in the Women's Championship now train in Tonbridge and Malling at K-Sports.
- ***Recreational football:*** Recreational football is played where facilities are typically booked and there might be someone to help organise. Examples include FA Just Play sessions, walking football and casual pitch hire for small-sided match play. There are currently 6 FA Just Play Centres in Tonbridge and Malling. Walking football sessions are delivered by a range of community organisations such as in the Angel Centre and Kings Hill Sports Park. Walking football and Just Play are areas that the County FA has prioritised to be sustained. Other local recreational football programmes include Rondos Academy.
- ***Informal football:*** Informal football is played in local parks and green spaces - it is free, open access and often played spontaneously (normal clothing is worn). Common examples include a kick-about at a local park or on a multi-use games area (MUGA).

5.6.2 Local football clubs

The key comments from the clubs in response to a questionnaire circulated by the Kent FA on behalf of the project team were as follows:

AFC Valour: The club stated that 'it is very hard to find an alternative '3G' facility when our home (grass) pitch is unavailable. We'd love to have access to a '3G' facility'.

Aylesford FC: The club made the following comments:

- 'We have a large waiting list of 20 at U7s but most other age groups we could accommodate one extra team at each age group'.
- 'There is currently a lack of good grass pitches in the area. 3G facilities are useful however these tend to have high hire costs and prioritised for adults football in our experience. Consequently, making smaller size 3G up to 9v9 may potentially help younger teams have better access to facilities. We need to ensure that recreational space is protected from the recent increase in housing. As a result of the increased housing in Aylesford we have definitely seen a challenge in meeting the local demand despite a recently acquired 3G pitch at the site. Ensuring we have more access and better quality grass pitches will ensure more games are played'.
- 'Parking is becoming a real issue for local residents and causing the football club to receive a lot of bad press that expanding would make worse. This could be made far worse by the recent proposal to charge at the bailey bridge car parks in Aylesford going to consultation'.
- 'Reduce pitch size of 3Gs to ensure priority goes to grassroots rather than high level football teams. Look to improve & protect the grass pitches we have from new housing. Allocate more grass and recreation space in new housing developments. Often it seems an artificial pitch is put in to save space for more housing'.
- 'Look to provide funding to clubs who already have a groundsman to buy them out for a day a week to work on other local pitches in the community'.

Borough Green Junior FC: The club made the following comments:

- 'We do have a waiting list but not enough per age group to create whole squads'.
- 'We are at the limit for pitch allocation for the teams we have'.
- 'We have an agreement as a preferred user of the Wrotham School '3G' pitch as the club was instrumental in the building of the pitch'.
- 'We could do with another 3G facility as we cannot get enough time for training and matches'.

Castle Colts FC: The club commented that 'we hire from five different sources - and rent outside of the parish and from Maidstone Borough Council - quality and conditions of pitches are a challenge'.

East Malling FC: The club commented that 'changing rooms [at Clare Park (Southward Playing Field)] need updating but haven't any financial support'.

Eccles FC: The club commented that 'we are waiting to see if Trenport are given the go ahead for a new development in Eccles. If they are planning to build on our existing pitches and provide us with new ones'.

Igtham FC: The club made the following comments:

- ‘The [Igtham Recreation Ground] pitch receives little to no maintenance, beyond some intermittent mowing. The grass cover has deteriorated, with more weeds instead’.
- ‘Ideally we would use a local facility, such as the artificial pitches at Wrotham School. These are oversubscribed, and preference seems to be given to larger clubs who make bigger bulk bookings’.
- ‘In the 15 years I have been playing, there has been a lot of improvement in availability with the addition of several ‘£G’ pitches. The grass pitches have generally deteriorated, and the cost of artificial pitches is prohibitive for some smaller clubs. Access to local training venues if also problematic, with many occupied by 6-a-side leagues or larger clubs. This is adding to the pressure on smaller village clubs, which have been folding with regularity over the last few years’.

Kent Football Academy: ‘There are number of issues we're facing in terms of pitches and facilities. We are a young Club and unfortunately do not have our own grounds yet. We train three times a week and host games in multiple locations including K-Sports, South Park Hockey and Grass pitches and New Line Academy. This of course is not convenient at all and deter many parents and carers from signing up their children with us. Apart from this, the fees are absolutely draining our budget and cause financial difficulties to the Club’.

Kings Hill FC: The club made the following comments:

- ‘We would like to look into opportunities to upgrade existing ‘3G’ so has viewing area and small stand so we can enter adult teams into FA Cup and also possibility of creating a second ‘3G’ at Kings Hill Sports Park’.
- ‘We have a football foundation grant of c.£80k which we put towards pitch maintenance’.

Larkfield FC: The club made the following comments:

- ‘Training during winter is our problem. Not enough ‘3G’ pitches and fees are higher. Clubs with that facility have increased fees’.
- ‘More ‘3G’ pitches are required’.

Real 60 FC: The club made the following comments:

- ‘The venue [Tunbury Recreation Ground] can get very boggy and is cut very infrequently during the season. This results in us using an alternative venue. We mark out the lines on a regular basis as part of our agreement’
- ‘More ‘3G’ pitches are required’.

Peter’s Village FC: The club made the following comments:

- ‘It’s our first season at Peters Village and we are working to improve it’.
- ‘We would prefer a training ground with floodlights nearer Peters Village’.
- ‘Demand outstrips availability and teams will fold. It took us 3 months to secure a pitch for one of our men’s teams and we was a week away from being excluded’.

Roselands FC: The club stated that there is ‘good provision of pitches [at the Racecourse Sports Ground], staff have assisted in relocating when necessary without any hassle’.

XL FC: The club made the following comments:

- 'Lack of pitch space - not enough time for our training sessions hard to find '3G' or grass pitch with floodlights that have any availability. Teams playing games in three different locations due to not enough pitch space'.
- 'The changing room block is only small so there is physically no room to put in officials changing and showers. The building is of good quality but not used as a changing room per se'.

5.7 The implications for football in Tonbridge and Malling

Analysis of local supply of football pitches in Tonbridge and Malling indicates the following:

- ***Local clubs:*** There is a strong network of England Accredited football clubs in Tonbridge and Malling, providing high quality coaching and playing opportunities.
- ***Unmet demand:*** Consultation with local clubs indicated that a total of 69 additional teams of all age groups could be accommodated in Tonbridge and Malling if the quality and quantity of pitch provision was improved, an increase of 16% from the number of existing teams.
- ***Displaced demand:*** The net effect of displaced demand for match pitches in Tonbridge and Malling is four exported teams.
- ***Provision in neighbouring areas:*** Assessments of football pitch provision in neighbouring areas indicate some spare capacity in neighbouring areas, particularly Gravesham and Medway. This means that there may be some scope for exporting grass pitch demand from Tonbridge and Malling.
- ***Grass pitch supply:*** The use of 12 grass pitches at seven sites in the borough was recently discontinued, which suggests there may be some spare capacity at some village sites.
- ***Overmarked pitches:*** 22 pitches in the borough 18% are overmarked on other pitches, which whilst allowing flexibility of use, also reduces the overall capacity available.
- ***Grass pitch quality:*** 17% of pitches in the borough are rated as 'poor' quality, with consequent reductions in carrying capacity. Several more are rated at the lower end of 'standard' quality
- ***Changing facilities:*** 32 pitches in the borough (27%) are served by 'poor' quality or no changing facilities.
- ***'3G' artificial grass pitches:*** There are eight full-sized '3G' pitches and one small-sided pitch in Tonbridge and Malling (plus one other full-sized '3G' pitch with no football community use). Based upon the FA calculation that there should be one full-sized '3G' pitch per 38 teams, there should be 11.42 pitches in the borough, so there is a current shortfall equivalent to almost three full-sized pitches.
- ***Secured community use:*** Only 3.7% of the pitches with community use and used are on sites without secured use.

5.8 Assessment of current needs

5.8.1 Introduction

To assess whether the current supply of pitches is adequate to meet existing demand an understanding of the situation at all sites available to the community needs to be developed. This is achieved by providing a brief overview for each site, which comprises:

- A comparison between the carrying capacity of a site with how much demand currently takes place there. The carrying capacity of a site is defined as the amount of play it can regularly accommodate without adversely affecting its quality and use. Demand is defined in terms of the number of 'match equivalent sessions' at each site. A 'match equivalent session' represents the wear and tear on a pitch equivalent to a formal match, so the impact of training sessions and unauthorised use can also be accounted for.
- An indication of the extent to which pitches are being used during their peak periods.

The site overviews identify the extent to which pitches are:

- ***Being overplayed:*** Where use exceeds the carrying capacity (highlighted in red in the tables below).
- ***Being played to the level the site can sustain:*** Where use matches the carrying capacity (highlighted in yellow in the tables below).
- ***Potentially able to accommodate some additional play:*** Where use falls below the carrying capacity (highlighted in green in the tables below).

In line with FA guidance, the following assumptions have been made in relation to the number of weekly match equivalents that can be accommodated by different quality pitches:

Pitch type	*Good quality*	*Standard quality*	*Poor quality*
Adult	3	2	1
Youth 11v11	4	2	1
Youth 9v9	4	2	1
Mini-soccer 7v7	6	4	2
Mini-soccer 5v5	6	4	2

5.8.2 Adult pitches

Site	Pitches	Users	Weekly capacity	Weekly demand	Weekly balance	Peak capacity	Peak demand	Peak balance
Clare Park Playing Field	1	East Malling FC Pippin United FC	2.0	2.0	Balanced	1.0	1.0	Balanced
Ditton Community Centre	2	Castle Colts FC Ditton Minors FC FC Ditton Vets	4.0	2.0	+2.0	2.0	2.0	Balanced
East Peckham Playing Field	3	AFC Valour Titans FC	6.0	2.0	+4.0	3.0	1.0	+2.0
Eccles Sports Club	2	Eccles FC	4.0	4.0	Balanced	2.0	2.0	Balanced
Igtham Playing Field	1	Igtham FC	1.0	1.0	Balanced	1.0	1.0	Balanced
K-Sports*	2	Greenways FC HMPPS Kent & Essex K-Sports Kent County Council FC *London City Lionesses* Malgo FC	6.0	5.0	+1.0	2.0	3.0	-1.0
Kings Hill Sports Park	3	Kent Police FC Kent Sands United FC Kings Hill FC	9.0	9.0	Balanced	3.0	4.0	-1.0
Larkfield Sports Club	1	East Malling FC Larkfield & New Hythe FC	3.0	4.0	-1.0	1.0	2.0	-1.0
Malling School	1	Borough Green Juniors FC Malling School	2.0	1.0	+1.0	1.0	1.0	Balanced
Mereworth Recreation Ground	1	AFC Phoenix Peter's Village FC	2.0	2.0	Balanced	1.0	1.0	Balanced
Peter's Village Playing Field	2	Peter's Village FC	4.0	1.0	+3.0	2.0	1.0	+1.0
Potyns Field	1	Snodland Town FC	3.0	2.0	+1.0	1.0	1.0	Balanced
Racecourse Sports Ground	5	AFC Tonbridge Roselands FC Tonbridge Junior FC	10.0	10.0	Balanced	5.0	5.0	Balanced
Snodland Community Centre	3	Snodland Town FC	6.0	6.0	Balanced	3.0	3.0	Balanced
Swanmead Sports Ground	1	Tonbridge Invicta FC	2.0	1.0	+1.0	1.0	1.0	Balanced
Tonbridge Farm	6	Artois United FC Tonbridge Invicta FC	12.0	5.0	+7.0	6.0	4.0	+2.0
Wateringbury Playing Field	1	Wateringbury FC	1.0	1.0	Balanced	1.0	1.0	Balanced
West Malling Village Hall	1	*Barming Youth FC* Rubicon Limerick FC	2.0	2.0	Balanced	1.0	1.0	Balanced
TOTALS	***37***	***-***	***79.0***	***60.0***	***+19.0***	***37.0***	***35.0***	***+2.0***

Following the cessation of leases and informal booking arrangements prior to the sale of the site to the London City Lionesses FC, who purchased on the basis of sole use, there is no ongoing occupation by other clubs.

The supply-demand balance for adult pitches by sub-area is as follows:

Sub-area	Weekly capacity	Weekly demand	Weekly balance	Peak capacity	Peak demand	Peak balance
Tonbridge and surrounds	31	19	+12.0	16	12	+4.0
Malling and surrounds	48	41	+7.0	21	23	-2.0
TONBRIDGE & MALLING	***79.0***	***60.0***	***+19.0***	***37.0***	***35.0***	***+2.0***

The key findings are:

- Peak time utilisation shows an overall deficit at three sites, is balanced at 13 sites and shows spare capacity at three sites.
- The collective peak time spare capacity in adult pitches in the borough amounts to 2.0 match equivalent sessions. This figure increases to spare capacity of 1.0 match equivalent session if Malling School without secured community access is excluded.
- The sub-area analysis shows that there is a peak time deficit in the Malling sub-area, offset by spare capacity in the Tonbridge sub-area.

5.8.3 Youth 11v11 pitches

Site	Pitches	Users	Weekly capacity	Weekly demand	Weekly balance	Peak capacity	Peak demand	Peak balance
Aylesford Recreation Ground	2	Aylesford FC	6.0	6.0	Balanced	2.0	3.0	-1.0
Ditton Community Centre	2	Castle Colts FC Ditton Minors FC	4.0	3.0	+1.0	2.0	2.0	Balanced
Frog Bridge	1	Tonbridge Invicta JFC	2.0	1.0	+1.0	1.0	1.0	Balanced
K-Sports*	2	Kent Football Academy	6.0	3.0	+3.0	2.0	1.0	+1.0
King George's Field	1	Borough Green Junior FC	1.0	1.0	Balanced	1.0	1.0	Balanced
Larkfield Recreation Ground	2	Larkfield FC	2.0	2.0	Balanced	2.0	1.0	+1.0
Leybourne Chase	2	Castle Colts FC	4.0	4.0	Balanced	2.0	2.0	Balanced
New Road Recreation Ground	1	Ditton Minors FC	2.0	1.0	+1.0	1.0	1.0	Balanced
Potter Mede Sports Ground	1	Borough Green Junior FC	2.0	2.0	Balanced	1.0	1.0	Balanced
Racecourse Sports Ground	4	Tonbridge Invicta JFC Tonbridge Junior FC	8.0	8.0	Balanced	4.0	4.0	Balanced
Stone House Field	1	Borough Green Junior FC	3.0	3.0	Balanced	1.0	2.0	-1.0
TOTALS	***19***	***-***	***40.0***	***34.0***	***+6.0***	***19.0***	***19.0***	***Balanced***

Following the cessation of leases and informal booking arrangements prior to the sale of the site to the London City Lionesses FC, who purchased on the basis of sole use, there is no ongoing occupation by other clubs.

The supply-demand balance for youth 11v11 pitches by sub-area is as follows:

Sub-area	Weekly capacity	Weekly demand	Weekly balance	Peak capacity	Peak demand	Peak balance
Tonbridge and surrounds	10.0	9.0	+1.0	5.0	5.0	**Balanced**
Malling and surrounds	30.0	25.0	+5.0	14.0	14.0	**Balanced**
TONBRIDGE & MALLING	***40.0***	***34.0***	***+6.0***	***19.0***	***19.0***	***Balanced***

The key findings are:

- Peak time use shows a deficit at two sites, balanced provision at seven sites and spare capacity at two sites.
- The collective peak time supply-demand position in the borough is balanced. All sites have secured community access.
- The sub-area analysis shows that provision is balanced in both sub-areas.

5.8.4 Youth 9v9 pitches

Site	Pitches	Users	Weekly capacity	Weekly demand	Weekly balance	Peak capacity	Peak demand	Peak balance
Brookfield Junior School	1	Ditton Minors FC Brookfield Junior School	2.0	3.0	-1.0	1.0	2.0	-1.0
Borough Green Recreation Ground	1	Borough Green Junior FC	2.0	2.0	Balanced	1.0	2.0	-1.0
Eccles Sports Ground	2	Aylesford FC	4.0	4.0	Balanced	2.0	4.0	-2.0
Frog Bridge	(1)	Tonbridge Invicta JFC	2.0	2.0	Balanced	1.0	1.0	Balanced
K-Sports*	1	Kent Football Academy	4.0	2.0	+2.0	1.0	1.0	Balanced
Kings Hill Sports Park	2(1)	Kings Hill FC Rondos Academy	12.0	13.0	-1.0	3.0	4.0	-1.0
Larkfield Recreation Ground	1(1)	Larkfield FC	2.0	3.0	-1.0	2.0	3.0	-1.0
Leybourne Chase	1	Castle Colts FC	2.0	2.0	Balanced	1.0	2.0	-1.0
Malling School	1	Ditton Minors FC Malling School	2.0	2.0	Balanced	1.0	1.0	Balanced
Mereworth Recreation Ground	(1)	Peter's Village FC	2.0	1.0	+1.0	1.0	1.0	Balanced
Peter's Village Playing Field	(1)	Peter's Village FC	2.0	1.0	+1.0	1.0	1.0	Balanced
Potter Mede Sports Ground	1	Borough Green Junior FC	2.0	2.0	Balanced	1.0	1.0	Balanced
Potyns Field	1	Snodland Town FC	2.0	2.0	Balanced	1.0	1.0	Balanced
Racecourse Sports Ground	2	Borough Green Junior FC Tonbridge Invicta JFC Tonbridge Junior FC	4.0	5.0	-1.0	2.0	3.0	-1.0
Snodland Community Centre	2	Snodland Town FC	4.0	2.0	+2.0	2.0	2.0	Balanced
Wateringbury Playing Field	1	Wateringbury FC	1.0	2.0	-1.0	1.0	2.0	-1.0
TOTALS	***17(5)***	***-***	***49.0***	***48.0***	***+1.0***	***22.0***	***31.0***	***-9.0***

Following the cessation of leases and informal booking arrangements prior to the sale of the site to the London City Lionesses FC, who purchased on the basis of sole use, there is no ongoing occupation by other clubs.
The supply-demand balance for youth 9v9 pitches by sub-area is as follows:

Sub-area	Weekly capacity	Weekly demand	Weekly balance	Peak capacity	Peak demand	Peak balance
Tonbridge and surrounds	7	9	-2.0	4	7	-3.0
Malling and surrounds	42	39	+3.0	18	24	-6.0
TONBRIDGE & MALLING	***49.0***	***48.0***	***+1.0***	***22.0***	***31.0***	***-9.0***

The key findings are:

- There is a peak time deficit at 12 sites, a balance at eight sites and provision is balanced at eight sites.
- The collective peak time deficit is 9.0 match equivalent sessions, which increases to 10.0 match equivalent sessions if site without secured community access is excluded.
- The sub-area analysis shows that there is a peak time deficit in both sub-areas.

5.8.5 Mini-soccer 7v7 pitches

Site	Pitches	Users	Weekly capacity	Weekly demand	Weekly balance	Peak capacity	Peak demand	Peak balance
Aylesford Recreation Ground	1	Aylesford FC	6.0	6.0	Balanced	1.0	4.0	-3.0
Ditton Junior School	1	Ditton Minors FC Ditton Junior School	4.0	2.0	+2.0	1.0	2.0	-1.0
Frog Bridge	2	Tonbridge Invicta JFC	8.0	2.0	+6.0	2.0	2.0	Balanced
K-Sports*	1	Kent Football Academy *Welling Town FC*	6.0	5.0	+1.0	1.0	2.0	-1.0
Kings Hill Sports Park	1(3)	Kings Hill FC Rondos Academy	24.0	12.0	+12.0	4.0	5.0	-1.0
Larkfield Recreation Ground	1(1)	Larkfield FC	4.0	2.0	+2.0	2.0	1.0	+1.0
Peter's Village Playing Field	(1)	Peter's Village FC	4.0	1.0	+5.0	1.0	1.0	Balanced
Potyns Field	(1)	Snodland FC	4.0	2.0	+2.0	1.0	1.0	Balanced
Racecourse Sports Ground	3	Tonbridge Invicta JFC Tonbridge Junior FC	12.0	11.0	+1.0	3.0	4.0	-1.0
Snodland Community Centre	2	Snodland FC	8.0	2.0	+6.0	2.0	2.0	Balanced
Swanmead Sports Ground	2(1)	Tonbridge Invicta JFC	12.0	4.0	+8.0	3.0	4.0	-1.0
Tonbridge Farm	1	Wateringbury FC	4.0	2.0	+2.0	1.0	1.0	Balanced
Wateringbury Playing Field	2	Wateringbury FC	4.0	4.0	Balanced	2.0	2.0	Balanced
TOTALS	***17(7)***	***-***	***100.0***	***55.0***	***+45.0***	***24.0***	***31.0***	***-7.0***

Following the cessation of leases and informal booking arrangements prior to the sale of the site to the London City Lionesses FC, who purchase on the basis of sole use, there is no ongoing occupation by other clubs.
The supply-demand balance for mini-soccer 7v7 pitches by sub-area is as follows:

Sub-area	Weekly capacity	Weekly demand	Weekly balance	Peak capacity	Peak demand	Peak balance
Tonbridge and surrounds	32	29	+3.0	11	16	-5.0
Malling and surrounds	58	26	+42.0	13	15	-2.0
TONBRIDGE & MALLING	***100.0***	***55.0***	***+45.0***	***24.0***	***31.0***	***-7.0***

The key findings are:

- There is a peak time deficit at six sites, use is balanced at six sites and there is spare capacity at one site.
- The collective peak time position shows a deficit of 7.0 match equivalent sessions, which increases to 8.0 match equivalent sessions if the site without secured access is excluded.
- There is a capacity deficit in both sub-areas.

5.8.6 Mini-soccer 5v5 pitches

Site	Pitches	Users	Weekly capacity	Weekly demand	Weekly balance	Peak capacity	Peak demand	Peak balance
Aylesford Recreation Ground	(2)	Aylesford FC	12.0	4.0	+8.0	2.0	2.0	Balanced
K-Sports*	1	Kent Football Academy	6.0	1.0	+5.0	1.0	1.0	Balanced
Kings Hill Sports Park	(5)	Kings Hill FC Rondos Academy	30.0	14.0	+16.0	5.0	5.0	Balanced
Larkfield Recreation Ground	1(2)	Larkfield FC	6.0	5.0	+1.0	3.0	3.0	Balanced
Leybourne Chase	2	Ditton Minors FC Leybourne Youth FC	8.0	7.0	+1.0	2.0	4.0	-2.0
Peter's Village Playing Field	(1)	Peter's Village FC	4.0	5.0	-1.0	1.0	3.0	-2.0
Racecourse Sports Ground	3	Tonbridge Junior FC	12.0	14.0	-2.0	3.0	7.0	-4.0
Swanmead Sports Ground	2	Tonbridge Invicta FC	8.0	4.0	+4.0	2.0	2.0	Balanced
Tunbury Recreation Ground	2	Real 60 FC	4.0	5.0	-1.0	2.0	3.0	-1.0
Wateringbury Playing Field	2	Wateringbury FC	4.0	1.0	+3.0	2.0	1.0	+1.0
TOTALS	***13(10)***	***-***	***94.0***	***60.0***	***+34.0***	***23.0***	***31.0***	***-8.0***

Following the cessation of leases and informal booking arrangements prior to the sale of the site to the London City Lionesses FC, who purchased on the basis of sole use, there is no ongoing occupation by other clubs.
The supply-demand balance for mini-soccer 5v5 pitches by sub-area is as follows:

Sub-area	Weekly capacity	Weekly demand	Weekly balance	Peak capacity	Peak demand	Peak balance
Tonbridge and surrounds	24	19	+5.0	7	10	-3.0
Malling and surrounds	70	41	+29.0	16	21	-5.0
TONBRIDGE & MALLING	***94.0***	***60.0***	***+34.0***	***23.0***	***31.0***	***-8.0***

The key findings are:

- Peak time utilisation shows an overall deficit at four sites, it is balanced at five sites and there is spare capacity at on site.
- The collective peak time deficit in the borough amounts to 8.0 match equivalent sessions. All sites have secured community use.
- There is a capacity deficit in both sub-areas.

5.8.7 '3G' artificial grass pitches

Peak utilisation rates of '3G' pitches in the borough is below. There is no effective spare capacity.

Site	Midweek used hours	% capacity	Saturday used hours	% capacity	Sunday used hours	% capacity
Aylesford FC	20	100%	6	100%	6	100%
Hugh Christie College	16	80%	4	67%	4	67%
Judd School	15	75%	4	67%	4	67%
K-Sports*	20	100%	6	100%	6	100%
Kings Hill Sports Park	20	100%	6	10%	6	100%
Leigh Academy Tonbridge	18	90%	4	67%	4	67%
Longmead Stadium	20	100%	6	100%	6	100%
Wrotham School	20	100%	6	100%	4	67%
TOTALS	***147***	***92%***	***42***	***88%***	***40***	***83%***

Following the cessation of leases and informal booking arrangements prior to the sale of the site to the London City Lionesses FC, who purchased on the basis of sole use, there is no ongoing occupation by other clubs.

The existing '3G' pitches in Tonbridge and Malling provide collectively the equivalent of 324 team training sessions per week. However, many local clubs have identified the lack of sports lit, all-weather pitches as an impediment to the development of the game locally and there is very limited spare capacity in the peak period at existing pitches. Based upon the FA calculation that there should be one full-sized '3G' pitch per 38 teams, there should be 11.42 full-sized pitches in Tonbridge and Malling. If the 69 additional teams identified by local clubs as representing unmet demand are included, the requirement increases to 13.24 pitches. If the capacity provided by the existing small-sided '3G' pitch is included, the net shortfall is 2.92 pitches or 4.74 pitches if unmet demand is included.

5.8.8 Use of hockey pitches for football

With a shortage of '3G' football turf pitches in Tonbridge and Malling, the artificial grass hockey pitch at K-Sports accommodate some football usage. The provision of additional '3G' football turf pitches in the borough would displace football demand to more appropriate facilities and free up much needed additional capacity for hockey use:

Site	Hockey use	Hockey use (%)	Football use	Football use (%)	Unused	Unused (%)
K-Sports	16 hours*	40%*	24 hours*	60%*	0 hours*	0%*
Tonbridge School	3 hours	7.5%	27 hours	67.5%	10 hours	25%

Following the cessation of leases and informal booking arrangements prior to the sale of the site to the London City Lionesses FC, who purchased on the basis of sole use, there is no ongoing occupation by other clubs.

5.9 Assessment of future needs

5.9.1 Population growth

Two scenarios are considered:

- The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).
- Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 or 27.7%.

5.9.2 Potential changes in demand

Consultation with local clubs indicated that the following additional teams could be accommodated in Tonbridge and Malling if the quality and quantity of pitch provision was improved. The projected increase is equivalent to a 15.9% rise in current team numbers.

Club	Adult 11v11	Youth 11v11	Youth 9v9	Mini 7v7	Mini 5v5
Aylesford FC	0	0	0	0	0
Borough Green Juniors FC	1	1	1	1	1
Castle Colts FC	0	0	0	3	2
East Malling FC	0	0	0	0	0
Eccles FC	0	0	0	0	0
Ide Hill FC	0	2	1	1	2
Igtham FC	0	0	0	0	0
Kent Football Academy	1	1	1	3	2
Kings Hill FC	0	2	2	1	2
Larkfield FC	1	2	1	1	2
London City Lionesses	0	0	0	0	0
Peter's Village FC	0	2	1	1	0
Real 60 FC	0	0	2	2	0
Roselands FC	0	0	0	0	0
Snodland Town FC	0	2	2	2	2
Tonbridge Angels FC	0	0	0	0	0
Tonbidge Junior FC	1	2	2	2	2
Wateringbury FC	0	0	0	0	0
XL FC	2	3	0	0	1
TONBRIDGE & MALLING	***6***	***17***	***13***	***17***	***16***

5.9.3 Site-specific pressures

There are no known proposed gains or losses in playing pitches in Tonbridge and Malling at present.

5.9.4 Potential changes in supply

The *'Tonbridge and Malling Local Football Facility Plan'* (2020) identifies potential sites to meet the shortfall in '3G' artificial grass pitches:

- Aylesford Recreation Ground (since provided).
- Kings Hill Sports Park (since provided).
- Leybourne Chase (currently under consideration by Larkfield and New Hythe FC).
- Tonbridge Farm Sports Ground (currently under consideration by Tonbridge and Malling BC).
- Tonbridge School (the Rowan's sand-filled pitch was subsequently resurfaced and accommodates substantial football training use by Tonbridge Juniors FC.

In June 2024, London City Lionesses FC purchased the K-Sports site and now have exclusive use of the pitches at the site.. This has displaced use by 17 football clubs and 98 teams, the implications of which are considered in scenario five below:

5.9.5 Existing spare capacity

The existing position for grass football pitch peak-time capacity has been calculated in terms of 'match equivalent sessions' in section 5.8 above and is as follows, for all sites and for sites with secured community access only. It is important to note that the shortfalls cannot be met by improvements to pitch quality (and related capacity), because they relate to peak period demand, which is defined by the number of pitches:

Pitch type	***All sites***	***Secured sites***
Adult	+2.0	+1.0
Youth 11v11	Balanced	Balanced
Youth 9v9	-9.0	-10.0
Mini-soccer 7v7	-7.0	-8.0
Mini-soccer 5v5	-8.0	-8.0

Peak-time utilisation rates of '3G' pitches in the borough is as follows. There is no effective spare capacity.

Site	Midweek used hours	% capacity	Saturday used hours	% capacity	Sunday used hours	% capacity
Aylesford FC	20	100%	6	100%	6	100%
Hugh Christie College	16	80%	4	67%	4	67%
Judd School	15	75%	4	67%	4	67%
K-Sports*	20	100%	6	100%	6	100%
Kings Hill Sports Park	20	100%	6	10%	6	100%
Leigh Academy Tonbridge	18	90%	4	67%	4	67%
Longmead Stadium	20	100%	6	100%	6	100%
Wrotham School	20	100%	6	100%	4	67%
TOTALS	***147***	***92%***	***42***	***88%***	***40***	***83%***

Following the cessation of leases and informal booking arrangements prior to the sale of the site to the London City Lionesses FC, who purchased on the basis of sole use, there is no ongoing occupation by other clubs.

5.9.6 Future grass pitch needs

Future formal grass pitch needs to 2041 are modelled below using 'Team Generation Rates' (TGRs), which identify how many people in a specified age group in the borough are required to generate one team. These are then applied to projected changes in population to identify the likely number of teams in the future:

- ***ONS projections:*** The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).

Sport	Age range	Current population	Current teams	Unmet demand	TGR	Population 2041	Teams 2041	Extra teams
Adult male football	17-45	22,054	84	0	1: 263	23,088	88	+4
Adult female football	17-45	23,697	23	6	1: 817	25,726	31	+2
Boys youth 11v11 football	12-16	4,793	85	7	1: 52	4,801	92	0
Girls youth 11v11 football	12-16	4,300	14	10	1: 179	4,214	23	-1
Boys youth 9v9 football	10-11	2,020	63	7	1: 29	1,966	68	-2
Girls youth 9v9 football	10-11	1,816	13	19	1: 57	1,796	32	0
Mini-soccer 7v7 (mixed)	8-9	3,531	77	17	1: 38	3,557	94	0
Mini-soccer 5v5 (mixed)	6-7	3,523	75	16	1: 39	3,537	91	0

- ***Housing projections:*** Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). At an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 or 27.7%.

Sport	Age range	Current population	Current teams	Unmet demand	TGR	Population 2041	Teams 2041	Extra teams
Adult male football	17-45	22,054	84	0	1: 263	25,442	97	+13
Adult female football	17-45	23,697	23	6	1: 817	28,420	35	+6
Boys youth 11v11 football	12-16	4,793	85	7	1: 52	5,304	102	+10
Girls youth 11v11 football	12-16	4,300	14	10	1: 179	4,655	26	+2
Boys youth 9v9 football	10-11	2,020	63	7	1: 29	2,172	75	+5
Girls youth 9v9 football	10-11	1,816	13	19	1: 57	1,984	35	+3
Mini-soccer 7v7 (mixed)	8-9	3,531	77	17	1: 38	3,929	103	+9
Mini-soccer 5v5 (mixed)	6-7	3,523	75	16	1: 39	3,907	100	+9

5.9.7 Future '3G' pitch needs

Under the lower population projections, based upon the projected net increase in team numbers of three by 2041, there will be an increase in demand equivalent to 0.08 full-sized '3G' football turf pitches. Under the higher population projections, there will be an increase of 57 teams, with additional demand equivalent to 1.5 full-sized '3G' artificial grass pitches.

One further issue that will need to be considered in the medium-term is that the European Union has voted to ban the sale of intentionally added microplastics in artificial pitches, including polymeric infill materials like rubber crumb. This ban came into force on October 17th 2023, with an eight-year transition period. The ban does not prevent the continued use of existing rubber crumb infill, nor does it prevent the construction of new pitches with rubber crumb infill before 2031. Following the UK's exit from the EU, the regulatory framework for these matters now sits at a UK level. The Department for Environment, Food and Rural Affairs (DEFRA) recently commissioned an evidence project to review emissions of intentionally added microplastics in Great Britain, including rubber infill. The project is expected to report in spring 2025 and will inform any future regulatory actions in Great Britain. The outcome nay affect '3G' pitch provision in the future, so once the implications become clearer, the issue should be revisited as part of the 'Stage E' review of this PPS.

In the meantime, consideration should be given to retro-fitting rubber crumb containment measures at '3G' pitch sites. These include:

- Fitting containment barriers on a pitch's perimeter fencing.
- Installing decontamination grates and boot cleaning brushes at all player and vehicle entrance gates.
- Ensuring all stormwater drains around a pitch have suitable microfilters to capture any infill being carried by surface run-off.

Planning applications relating to additional '3G pitches will need to produce or take account of:

- Sport England's acoustic guidance.
- The need for a community use agreement for projects on education sites.
- Business plan including a sinking fund.
- A containment and recycling strategy for the rubber crumb and pitch carpet.
- Biodiversity Net Gain cannot take out additional useable playing field.

5.10 Key findings and issues

5.10.1 What are the main characteristics of current supply and demand?

- ***Local clubs:*** There is a strong network of England Accredited football clubs in Tonbridge and Malling, providing high quality coaching and playing opportunities.
- ***Unmet demand:*** Consultation with local clubs indicated that a total of 69 additional teams of all age groups could be accommodated in Tonbridge and Malling if the quality and quantity of pitch provision was improved, an increase of 16% from the number of existing teams.
- ***Displaced demand:*** The net effect of displaced demand for match pitches in Tonbridge and Malling is four exported teams.
- ***Provision in neighbouring areas:*** Assessments of football pitch provision in neighbouring areas indicate some spare capacity in neighbouring areas, particularly

Gravesham and Medway. This means that there may be some scope for exporting grass pitch demand from Tonbridge and Malling.

- ***Grass pitch supply:*** The use of 12 grass pitches at seven sites in the borough was recently discontinued, which suggests there may be some spare capacity at some village sites.
- ***Overmarked pitches:*** 22 pitches in the borough 18% are overmarked on other pitches, which whilst allowing flexibility of use, also reduces the overall capacity available.
- ***Grass pitch quality:*** 17% of pitches in the borough are rated as 'poor' quality, with consequent reductions in carrying capacity. Several more are rated at the lower end of 'standard' quality.
- ***Changing facilities:*** 32 pitches in the borough (27%) are served by 'poor' quality or no changing facilities.
- ***'3G' football turf pitches:*** There are eight full-sized '3G' pitches and one small-sided pitch in Tonbridge and Malling (plus one other full-sized '3G' pitch with no football community use). Based upon the FA calculation that there should be one full-sized '3G' pitch per 38 teams, there should be 11.42 pitches in the borough, so there is a current shortfall equivalent to almost three full-sized pitches. Prior to the sale of the K-Sports site to London City Lionesses FC, use by any other clubs was ceased by the previous owners. The full implications of this will be considered in the first review of the strategy at stage E.
- ***Secured community use:*** Only 3.7% of the pitches with community use and used are on sites without secured use.

5.10.2 Is there enough accessible and secured community use to meet current demand? ***NO*** - there is a significant deficit for youth 9v9, mini 7v7 and mini 5v5 pitches in the peak period, although there is some collective spare capacity on a weekly basis.

- ***Adult grass pitches:*** There is collective peak spare capacity of 1.0 weekly match equivalent session at accessible, community-secured sites.
- ***Youth 11v11 pitches:*** Peak supply and demand is balanced at the community-secured sites.
- ***Youth 9v9 pitches:*** There is a collective peak deficit of 10.0 weekly match equivalent session at community-secured sites.
- ***Mini-soccer 7v7 pitches:*** There is a collective peak deficit of 8.0 weekly match equivalent session at community-secured sites.
- ***Mini-soccer 5v5 pitches:*** There is a collective peak deficit of 8.0 weekly match equivalent session at community-secured sites.
- ***'3G' artificial grass pitches:*** Based on the FA's calculation of training needs, there should be an extra 4.74 '3G' pitches in Tonbridge and Malling, if the 69 additional teams identified by local clubs as representing unmet demand are included.

5.10.3 Is the accessible provision of suitable quality and appropriately maintained? ***NO*** - Almost one in six pitches are either 'poor' quality or in danger of becoming so

- ***Quality:*** 15.9% of pitches in the borough are rated as 'poor' quality, with consequent reductions in carrying capacity. Many more suffer from poor drainage and so are rated at the lower end of 'standard' quality.
- ***Maintenance:*** Improved maintenance at 14 'poor' quality and low rated 'standard' quality pitches in Tonbridge and Malling would improve their carrying capacity.

5.10.4 What are the main characteristics of future supply and demand?

- ***Population growth:*** Two scenarios are considered:
  - The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).
  - Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 or 27.7%.

- ***Changes in demand:*** Projecting future need based on current demand patterns (including identified unmet demand) is a reasonable basis for forecasting.
- ***Changes in supply:*** Five potential sites for '3G' football turf pitches in the borough have been identified and two have since been provided.
- ***Existing spare capacity:*** The only current space capacity in the peak period is 1.0 match equivalent session on adult grass pitches.
- ***Future needs:*** Based on the two projected population growth scenarios, there will be a need for the following number of additional peak time match equivalent sessions by 2041:

Pitch type	*ONS Projections*	*Housing projections*
Adult	6.0	19
Youth 11v11	-1.0	12
Youth 9v9	-2.0	8
Mini-soccer 7v7	0	9
Mini-soccer 5v5	0	9
'3G' football turf	3.0	57.0

5.10.5 Is there enough accessible and secured provision to meet future demand? ***No*** - there is a deficit for all pitch types apart from adult under both of the population projections.

The situation at community accessible pitches in the borough is summarised below:

- ***Current secured pitches:*** The number of pitches of each type with secured community access is listed in the second column.
- ***Current secured peak spare pitch capacity:*** The spare capacity at secured pitches is listed in the third column, with deficits indicated by a minus sign.
- ***Current peak pitch demand:*** The number of pitches currently required to meet peak demand is listed in the fourth column.
- ***Extra peak pitch needs by 2041:*** The number of extra pitches needed to meet projected demand by 2041 is listed in the fifth column.
- ***Total peak pitch needs by 2041:*** Total pitch needs in 2041 are listed in the sixth column, derived by adding the current and future assessed needs.

- ***ONS projections:***

Pitch type	Current secured pitches	Current secured peak spare pitch capacity	Current peak pitch demand	Extra peak pitch needs by 2041	Total peak pitch needs by 2041
Adult football	37	+1.0	36.0	+6.0	42.0
Youth 11v11	19	Balanced	19.0	-1.0	18.0
Youth 9v9	20	-10.0	31.0	-2.0	29.0
Mini 7v7	23	-8.0	31.0	0	31.0
Mini 5v5	25	-8.0	31.0	0	31.0

- ***Housing projections:***

Pitch type	Current secured pitches	Current secured peak spare pitch capacity	Current peak pitch demand	Extra peak pitch needs by 2041	Total peak pitch needs by 2041
Adult football	37	+1.0	36.0	+19.0	55.0
Youth 11v11	19	Balanced	19.0	+12.0	31.0
Youth 9v9	20	-10.0	31.0	+8.0	39.0
Mini 7v7	23	-8.0	31.0	+9.0	40.0
Mini 5v5	25	-8.0	31.0	+9.0	40.0

Scenario testing

5.11.1 Introduction

Based upon the key findings and issues identified above, a number of scenarios have been examined, to identify the optimum approach to addressing needs.

5.11.2 Scenario 1: Accessing pitches on education sites

- ***Rationale:*** The following pitches on school sites in Tonbridge and Malling have no community use at present:

Site	Address	Adult 11v11	Youth 11v11	Youth 9v9	Mini 7v7	Mini 5v5
Aylesford School	Teapot Lane, Aylesford ME20 7JU	1	1	-	-	-
Bishop Chavasse Primary School	Baker Lane, Tonbridge TN11 0FB	-	-	-	1	-
Borough Green Primary School	School Approach, Borough Green TN15 8JZ	-	1	-	1	-
Burham Primary School	Bell Lane, Burham ME1 3SY	-	-	1	1	-
Cage Green Primary School	Cage Green Road, Tonbridge TN10 4PT	-	-	1	2	-
East Peckham Primary School	Pound Road, East Peckham TN12 5LH	-	1	-	-	-
Hadlow College	Tonbridge Road, Hadlow TN11 0AL	3	-	-	-	-
Hadlow Primary School	School Lane, Hadlow TN11 0EH	-	-	-	1	-

Site	Address	Adult 11v11	Youth 11v11	Youth 9v9	Mini 7v7	Mini 5v5
Hilden Grange School	Dry Hill Park Road, Tonbridge TN10 3BX	-	5	-	-	-
Hillview School for Girls	Brionne Gardens, Tonbridge TN9 2HE	-	1	-	-	-
Homesdale School	Malling Road, Snodland ME6 5HS	2	1	-	-	-
Hugh Christie College	White Cottage Road, Tonbridge TN10 4PU	1	-	-	-	-
Kings Hill School	Crispin Way, Kings Hill ME19 4LS	-	-	-	2	-
Leigh Academy	Brook Street, Tonbridge TN9 2PH	1	-	-	-	-
Leybourne Primary School	Rectory Lane North, Leybourne ME19 5HD	-	-	-	1	-
Longmead Primary School	Waveney Road, Tonbridge TN10 3JU	-	-	1	1	1
Lunsford Primary School	Swallow Way, Larkfield ME20 6PY	-	-	1	1	2
Mereworth Primary Sch.	The Street, Mereworth ME18 5ND	-	-	1	1	-
More Park Primary Sch.	Luck's Hill, West Malling ME19 6HN	-	-	-	1	-
Offham Primary School	Church Road, Offham ME19 5NX	-	-	-	1	-
Platt Primary School	Maidstone Road, Platt TN15 8JY	-	-	-	2	-
Plaxtol Primary School	School Lane, Plaxtol TN15 0QD	-	-	-	1	-
Royal Rise Primary Sch.	Royal Rise, Tonbridge TN9 2DQ	-	-	-	1	-
Ryarsh Primary School	Birling Road, Ryarsh ME19 5LS	-	-	1	2	2
Shipbourne Primary Sch.	Stumble Hill, Shipbourne TN11 9PB	-	-	-	1	-
Slade Primary School	The Slade, Tonbridge TN9 1HR	-	-	-	2	-
Snodland Primary School	Roberts Road, Snodland ME6 5HL	-	-	-	1	-
St. James the Great Academy	Chapman Way, East Malling ME19 6SD	-	-	1	2	2
St. Katherine's School	St Katherine's Lane, Snodland ME6 5EJ	-	1	-	-	-
St. Margaret Clitheroe Prim School	Trench Road, Tonbridge TN11 9NG	-	-	2	2	2
St. Mark's Prim School	Eccles ME20 7HS	-	-	1	1	-
Stocks Green Primary School	Leigh Road, Hildenborough TN11 9AE	-	-	2	2	-
The Discovery School	Discovery Drive, West Malling ME19 4GJ	-	-	-	2	-
Tonbridge School	London Road, Tonbridge TN10 3AD	11	-	-	-	-
Trottiscliffe Primary Sch.	Church Lane, Trottiscliffe ME19 5EB	-	-	-	2	-
Tunbury Primary School	Tunbury Avenue, Bluebell Hill ME5 9HY	-	-	1	1	1
Valley Invicta Primary School	Teapot Lane, Aylesford ME20 7JU	-	-	1	1	1

Site	Address	Adult 11v11	Youth 11v11	Youth 9v9	Mini 7v7	Mini 5v5
Valley Invicta Primary School	Pollyfield Close, Snodland ME6 5GR	-	-	-	1	-
Valley Invicta Primary School	Warwick Way, Kings Hill ME19 4AL	-	-	-	1	2
Valley Invicta Primary School	Derby Drive, Leybourne ME19 5FJ	-	-	-	2	-
Wateringbury Primary School	Bow Road, Wateringbury ME18 5EA	-	-	-	2	-
Weald of Kent School	Tudeley Lane, Tonbridge TN9 2JP	2	-	-	-	-
West Malling Primary School	Norman Road, West Malling ME19 6RL	-	-	-	1	-
Woodlands Primary Scho	Higham School Road, Tonbridge TN10 4BB	-	-	-	2	-
Wouldham All Saints Prim. School	Worrall Drive, Wouldham ME1 3GE	-	-	-	2	-
Wrotham School	Borough Green Road, Wrotham TN15 7RD	2	-	-	-	-
TOTALS	-	***23***	***11***	***14***	***49***	***13***

- The table below models the effect of gaining access to school pitches to meet current community demand. It shows that all current needs could be met. Whilst pitch capacity is reduced by the education use, it would nevertheless make sense to consider investigating the potential for securing community use of these pitches to meet current and additional future demand, prior to making entirely new provision.

Pitch type	Current School pitches	Peak match equivalent capacity	Unmet current peak deficit (match equivalents)	Balance
Adult football	23	23.0	+1.0	+24.0
Youth 11v11	11	11.0	Balanced	+11.0
Youth 9v9	14	14.0	-10.0	+4.0
Mini 7v7	49	49.0	-8.0	+41.0
Mini 5v5	13	13.0	-8.0	+5.0

- ***Advantages:*** The advantages of this scenario are as follows:

  - The pitches already exist and therefore could be brought into use at little or no additional cost, depending on the current quality of the respective pitches.
  - There would be opportunities to establish closer school-club links if community-based clubs were playing on school sites.
  - The pitches should be available during the peak demand periods for community-based teams at weekends.

- ***Disadvantages:*** The disadvantages of this scenario are as follows:

  - Most of the schools have no community use at present and there is no obvious mechanism for securing it, so there is no guarantee that they would be prepared to commence such an arrangement.

- No site has a Community Use Agreement so continued access would be unsecured.
- No assessment has been made of the quality of schools pitches without community use, so the extent of their capacity to accommodate additional use is unknown.

- ***Conclusions:*** This scenario offers some advantages for enhancing local pitch capacity on a cost-effective basis and should therefore be examined further on a site-by-site basis.

5.11.3 Scenario 2: Improve existing grass pitch carrying capacity

- ***Rationale:*** The following football pitches in Tonbridge and Malling are either 'standard' or 'poor' quality and as such their carrying capacity is compromised. Pitches shown in brackets are over-marked:

Site	*Pitch rating*	*Adult 11v11*	*Youth 11v11*	*Youth 9v9*	*Mini 7v7*	*Mini 5v5*
Brookfield Junior School	Standard	-	-	1	-	-
Borough Green Recreation Ground	Standard	-	-	1	-	-
Clare Park Playing Field	Standard	1	-	-	-	-
Ditton Community Centre	Standard	2	2	-	-	-
Ditton Junior School	Standard	-	-	-	1	-
East Peckham Playing Field	Standard	3	-	-	-	-
Eccles Sports Club	Standard	2	-	-	-	-
Eccles Sports Ground	Poor	-	-	2	-	-
Frog Bridge	Standard	1	1	(1)	(2)	-
Igtham Playing Field	Poor	1	-	-	-	-
King George's Field	Poor	-	1	-	-	-
Larkfield Recreation Ground	Standard	-	2	1(1)	1(1)	1(2)
Leybourne Chase	Standard	-	2	1	-	2
Malling School	Standard	1	-	1	-	-
Mereworth Recreation Ground	Standard	1	-	(1)	-	-
New Road Recreation Ground	Standard	-	1	-	-	-
Peter's Village Playing Field	Standard	2	-	(1)	(1)	(1)
Potter Mede Sports Ground	Standard	-	1	1	-	-
Potyns Field	Standard	1	-	1	(1)	-
Racecourse Sports Ground	Standard	5	4	2	3	3
Snodland Community Centre	Standard	3	-	2	2	-
Swanmead Sports Ground	Standard	1	-	-	2(1)	2
Tonbridge Farm	Standard	6	-	-	1	-
Tunbury Recreation Ground	Poor	-	-	-	-	2
Wateringbury Playing Field	Poor	1	-	1	2	2
West Malling Village Hall	Standard	1	-	-	-	-
TOTALS	***-***	***32***	***14***	***13(4)***	***12(6)***	***12(3)***

- The table below models the effect of improving the pitches to 'good' quality and subsequently maintaining them as such.

Pitch type	Improved pitch capacity (match equivalents)	Unmet current peak demand (match equivalents)	Balance (match equivalents)
Adult football	35.0	+1.0	+36.0
Youth 11v11	15.0	Balanced	+15.0
Youth 9v9	32.0	-10.0	+22.0
Mini 7v7	30.0	-8.0	+22.0
Mini 5v5	27.0	-8.0	+19.0

- ***Advantages:*** The advantages of this scenario are as follows:

  - Overall usage capacity would be improved, the districtwide collective weekly capacity deficiencies would be eliminated and the distribution of the sites gives good geographical coverage across the whole district.
  - This would be a cost-effective option compared with the expense of providing new pitches, particularly if land acquisition costs are factored in.

- ***Disadvantages:*** The disadvantages of this scenario are as follows:

  - Whilst the capital cost of pitch improvements may be supported by the Football Foundation grants programmes, the main financial challenge to many pitch providers would be meeting the revenue cost implications of the enhanced works associated with maintaining the pitch quality as 'good'.
  - The grounds maintenance specification at council-owned pitches is not consistent with maintaining the pitches to a high standard, so the only option for achieving this at council-owned pitches is through an asset transfer to user clubs.
  - The major benefit of capacity improvements are on weekly capacity and would have very limited impact on the peak period shortfalls, unless fixtures can be scheduled back-to-back, as is sometimes the case with youth football and mini-soccer games.

- ***Conclusions:*** Based upon the sub-area assessment, improving the pitches Larkfield Recreation Ground, The Racecourse Sports Ground and Wateringbury Recreation Ground would have the greatest impact on current deficiencies.

5.11.4 Scenario 3: The impact of flooding at the Racecourse Recreation Ground

- ***Rationale:*** The Racecourse Sports Ground is subject to flooding for prolonged periods each winter, which eliminates its pitch carrying capacity at these times. The effect of this is tabulated below and shows that there is insufficient capacity to accommodate the displaced demand on existing grass pitches elsewhere in the borough.

Pitch type	Current weekly capacity	Current peak capacity	Current peak demand	Current surplus/ deficit	Spare capacity elsewhere	Unmet peak time demand
Adult	12.0	5.0	5.0	Balanced	+1.0	-4.0
Youth 11v11	8.0	4.0	4.0	Balanced	Balanced	-4.0
Youth 9v9	4.0	2.0	3.0	-1.0	-10.0	-13.0
Mini 7v7	12.0	3.0	4.0	-1.0	-8.0	-12.0
Mini 5v5	12.0	3.0	7.0	-4.0	-8.0	-15.0

Tonbridge School has received Football Foundation funding for grounds maintenance equipment, on condition of which is that its grass pitches are made available for community use. The school has 11 adult football pitches available in the spring term (January to March) which coincides with the period of peak flooding at the Racecourse Sports Ground.

- ***Advantages:*** The advantages of this scenario are as follows.

  - The pitches are geographically close to the Racecourse Sports Ground so would serve the same catchment.
  - They are available in the period of peak flooding at the Racecourse Sports Ground.
  - There are no capital cost implications.

- ***Disadvantages:*** The disadvantages of this scenario are as follows.

  - The pitches are all adult pitches and the greatest displaced demand from the Racecourse Sports Ground is for youth and mini pitches (although with the consent of the school, there is no reason why these could not be over-marked on adult pitches).
  - There is currently no Community Use Agreement relating to the grass pitches, so community access would not be secured. However, there are Community Use Agreements in place regarding other sports facilities at Tonbridge School, so it may be possible to extend an existing arrangement.

- ***Conclusions:*** The periodic loss of the pitches at the Racecourse Sports Ground to flooding exacerbates the existing capacity shortfall in the area. Developing community access to the Tonbridge School pitches in the period of peak flooding would be a cost-effective way of securing additional capacity, particularly if youth and mini pitches could be accommodated through over-marking.

5.11.5 Scenario 4: The effect of FA participation targets

- ***Rationale:*** As an alternative to estimates of additional team formation by local clubs that have already been factored into future need projections via the Team Generation Rate calculations, the FA has a number of national participation targets by 2028 as follows:

Team type	*Participation targets*	*Current teams*	*Extra teams*	*Total teams*
Adult male	-3%	84	-3	81
Adult female	+48%	23	11	34
Youth 11v11 male	+15%	85	13	98
Youth 11v11 female	+48%	14	7	21
Youth 9v9 male	+15%	63	9	72
Youth 9v9 female	+48%	13	6	19
Mini 7v7	+15%	77	12	89
Mini 5v5	+15%	75	11	86
TOTALS	***-***	***434***	***66***	***500***

The FA participation target projections suggest an additional 66 teams in the borough by 2028, whereas the local club estimates indicate 82 teams.

- ***Advantages:*** The advantage of the FA growth scenario is that it is based upon recent national participation patterns, so is grounded in demonstrable current trends.
- ***Disadvantages:*** The disadvantage of the FA growth scenario is that it is nationally rather than locally derived and local clubs are better placed to estimate additional team formation based upon their knowledge of more localised demand and need.
- ***Conclusions:*** Future needs in the Tonbridge and Malling PPS will continue to be based upon local club estimates of growth in team formation. The projected figure allows for an 15.9% increase in teams, compared with the FA figure of 15% and it is considered prudent to plan for the higher figure.

5.11.4 Scenario 5: Mitigating the loss of pitches at the former K-Sports site

- ***Rationale:*** . Prior to the sale of the K-Sports site to London City Lionesses FC, use by any other clubs was ceased by the previous owners. London City Lionesses require exclusive use of the site in the future to meet their training requirements, therefore 17 clubs and up to a total of 98 teams have been seeking alternative locations for competitive play and/or training as follows.

Club	*Match venue(s)*	*Training venue(s)*	*Adult teams*	*Youth 11v11)*	*Youth (9v9)*	*Mini (7v7)*	*Mini (5v5)*
CALM Kickabout	K-Sports '3G'	-	2	-	-	-	-
Castle Colts FC	Ditton Community Ctre. Leybourne Chase *Allington Primary School* *Palace Wood Primary Sch.* *The Orchard Ground*	*Maplesden Noakes '3G'* K-sports AGP	2	12	7	5	3
Greenways FC	K-Sports	-	1	-	-	-	-
HMPPS Kent and Essex	K-Sports	-	2	-	-	-	-
K-Sports FC	K-Sports	-	1	-	-	-	-
Kent County Council FC	K-Sports	-	1	-	-	-	-
Kent Football Academy	K-Sports *South Park, Maidstone* *New Line Academy '3G'*	K-Sports '3G' *New Line Academy '3G'*	-	1	2	-	1
Kent Star Ladies FC	K-Sports	-	-	-	-	1	-
Larkfield FC	Larkfield Sports Club Larkfield Recn. Ground	K-Sports '3G'	1	2	7	2	5
London City Lionesses	K-Sports	K-Sports '3G'	2	1	-	-	-
Maidstone Utd. Women's FC	K-Sports	-	3	-	-	-	-
Malgo FC	K-Sports	-	1	-	-	-	-
Peter's Village FC	Peter's Village Pl. Field Mereworth Recn. Ground *Mote Park*	K-Sports '3G'	2	2	3	1	5

Club	Match venue(s)	Training venue(s)	Adult teams	Youth 11v11)	Youth (9v9)	Mini (7v7)	Mini (5v5)
Showcase PR FC	K-Sports	-	1	-	-	-	-
Sports Connect FC	K-Sports	-	1	-	-	-	-
Weald Wolves FC	K-Sports	-	2	-	-	-	-
Welling Town FC	*Bauville Stadium* K-Sports	K-Sports '3G'	7	4	-	3	4
West Kingsdown FC	K-Sports	-	1	-	-	-	-
TOTALS	**-**	**-**	***30***	***33***	***19***	***12***	***18***

- ***Implications:*** The implications of the reduced capacity for Tonbridge and Malling are as follows:

Pitch type	Current peak boroughwide surplus/deficit	Peak capacity at K-Sports	Revised boroughwide peak surplus/deficit
Adult	Balanced	2.0	-2.0
Youth 11v11	Balanced	2.0	-2.0
Youth 9v9	-1.0	1.0	-2.0
Mini 7v7	-1.0	1.0	-2.0
Mini 5v5	-4.0	1.0	-5.0
'3G'	-4.74	1.0	-5.74

- ***Options:*** The options for mitigating the loss of pitch capacity are as follows.

  - As Scenario One above, accessing school pitches with no community use at present.
  - As Scenario Two above, improving pitch quality and carrying capacity elsewhere.
  - Providing an additional '3G' pitch in the north of the borough. The proposed pitches at Leybourne Chase will assist in this regard.
  - Displacing use by the teams from outside the borough that used the K-Sports pitches back to their home areas.

- ***Conclusions:*** The loss of the pitches at K-Sports has a significant impact on existing pitch shortfalls in the borough and displaced teams will need to be accommodated elsewhere. The full implications of this will be considered in the first review of the strategy at stage E.

5.12 Policy recommendations

5.12.1 Introduction

The Tonbridge and Malling PPS is a robust and evidence-based assessment of the current and future needs for football in the borough. The recommendations in relation to football are made in the context of the National Planning Policy Framework (NPPF), which stipulates that existing open space including playing pitches, should not be built upon unless:

- An assessment has taken place which has clearly shown the open space to be surplus to requirements, or;
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality, in a suitable location, or;

- The development is for alternative sport and recreation provision, the needs for which clearly outweighs the loss.

The following recommendations are arranged under the three main headings of 'protect', 'enhance' and 'provide'.

5.12.2 Protect

Recommendation 1 - Safeguarding existing provision: The Study identifies a need for all current and disused football pitch sites to be retained, on the basis of the specific identified roles that each can play in delivering the needs of the sport and/or other wider open space functions in Tonbridge and Malling both now and in the future. It is therefore recommended that existing planning policies continue to support the retention and protection of all sites, based upon the evidence in the PPS. If any pitch sites do become the subject of development proposals, this will only be permissible if they are replaced and meet policy exception E4 of Sport England's Playing Fields Policy. This states that 'the playing field or playing fields which would be lost as a result of the proposed development must be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of development'.

Recommendation 2 - Security of tenure: 3.7% of the football pitches in the borough are on sites without secured community use. Without Community Use Agreements it is impossible to assume their continued availability for the community. It is therefore recommended that efforts are made to achieve security of Community Use Agreements at sites without them at present.

5.12.3 Enhance

Recommendation 3 - Improving existing 'poor' quality provision, including disused sites: 20 pitches in the borough (15.9%) are rated as 'poor' quality and several more are rated at the lower end of 'standard' quality. Additionally, 27 pitches (21.4%) are served by 'poor' quality or no changing facilities. This reduces the quality of playing experience and may deter potential participants. Improving the pitches at Larkfield Recreation Ground, The Racecourse Sports Ground and Wateringbury Recreation Ground would have the greatest impact on current deficiencies.

- The owners of sites with 'poor' quality pitches should subscribe to the Football Foundation's Pitch Power programme, a low-cost service that provides a pitch quality assessment and recommendations on how to improve maintenance to enhance capacity.
- The site owners concerned should be supported to apply for external funding for facility enhancements, including the receipt of developer contributions (see below) where the usage capacity would be enhanced.
- User clubs at council-owned pitches should be offered the opportunity to take over the maintenance of the pitches to improve quality and capacity, with appropriate initial support such as the loan of equipment, training and financial support.

Recommendation 4 - Developer contributions and external funding (enhancements): Some of the additional demand for football arising from the proposed housing development in Tonbridge and Malling to 2041 can be accommodated by enhancing existing pitches and facilities. Improving the pitches at Larkfield Recreation Ground, The Racecourse Sports Ground and Wateringbury Recreation Ground would have the greatest impact on current deficiencies. It is recommended that the site-specific action plan in the Tonbridge and Malling

PPS be used as the basis for determining facility enhancements that demonstrably relate to the scale and location of specific developments and that an appropriate level of financial contributions be sought under S106 developer contributions and/or through applications for external funding to cover the capital and revenue implications of the enhancements.

5.12.4 Provide

Recommendation 5 - '3G' football turf pitches: Based upon the FA's guide figure, there is a current shortfall of three full-sized '3G' pitches in the borough, with additional demand equivalent to 1.5 full-sized pitches being generated by the higher population growth projection to 2041. '3G' pitches are an important component of provision because their all-weather nature and floodlights enable a high volume of play to be accommodated on good quality playing surfaces. The provision of additional '3G' pitches to meet needs identified in the Tonbridge and Malling PPS should be supported as a priority in appropriate locations.

Recommendation 6 - Developer contributions and external funding (new provision): Some of the extra demand for football in particular arising from the proposed housing development in Tonbridge and Malling to 2041, may need to be accommodated through the provision of new pitches and facilities, once options for improving capacity at existing sites have been explored. It is recommended that an appropriate level of financial contributions be sought under S106 developer contributions to meet the specific future needs identified in the Tonbridge and Malling PPS to cover the capital and revenue implications of new provision.

5.13 Action Plan

5.13.1 Introduction

In the context of the high-level recommendations above, the tables below set out the football site-specific action plan to guide the implementation of the Study. The abbreviations stand for TMBC - Tonbridge and Malling Borough Council, FA - Football Association, FF - Football Foundation and PP - Pitch Power (the Football Foundation's pitch improvement tool). The capital cost estimates are based upon Sport England's *'Facility Costs - Second Quarter of 2023'* (2023), but actual costs will vary based on site-specific conditions.

5.13.2 Key strategic actions

Issues	*Action*	*Lead*	*Partners*	*Resources*	*Priority*
Community access to public and private education pitches	Pursue formal Community Use agreements at all existing and any future proposed pitches on public and private education sites.	TMBC	Academies and schools	Possible funding for improvements to physical accessibility.	High
Securing developer contributions	Ensure that policy provision is made to secure developer contributions towards new and improved football facilities.	TMBC	Developers	Determined by Sport England's Playing Pitch Calculator	High
Identify sites for additional '3G' football turf pitches	Examine the feasibility of providing additional '3G' pitches at the identified key sites.	Potential host sites	FF CIL funding	£10,000 for feasibility studies £1,100,000 per pitch	High
Site specific grounds	Review site specific grounds maintenance needs through	FA	PP	£100 per site annually.	High

Issues	Action	Lead	Partners	Resources	Priority
maintenance needs	the FA Pitch Improvement Programme.				
Sports lighting energy efficiency	Replace old sports lighting with LED heads and upgrade switching gear	Site owners	-	£30,000 per site	Medium
'3G' pitch rubber crumb containment	Retrofit containment measures	Site owners	-	£20,000 per site	Medium

5.13.3 Site specific actions

Site	Issues	Action	Lead	Partners	Resources	Priority
Aylesford FC	No current issues.	No action required.	-	-	-	-
Aylesford Recreation Ground	Youth 11v11 and mini 7v7 pitches used to over capacity at peak times.	Schedule additional matches on the'3G' pitch on-site.	Aylesford FC	-	-	High
Brookfield Junior School	• Youth 9v9 pitch used to over capacity at peak times. • No secured community use.	• Seek resources to improve maintenance to enhance capacity. • Develop Community Use Agreement.	Brookfield Junior School	TMBC	£2,000 per annum	Medium
Borough Green Recreation Ground	Youth 9v9 pitch used to over-capacity.	• Assess pitch using Pitch Power. Seek resources to improve maintenance to enhance capacity.	Borough Green PC	PP	£100 per annum for Pitch Power. £2,000 per annum.	High
Clare Park Playing Field	No current issues.	No action required.	-	-	-	-
Ditton Community Centre	No current issues.	No action required.	-	-	-	-
Ditton Junior School	• Mini 7v7 pitch used to over capacity at peak times. • No secured community use.	• Seek resources to improve maintenance to enhance capacity. • Develop Community Use Agreement.	Brookfield Junior School	TMBC	£2,000 per annum	Medium
East Peckham Playing Field	No current issues.	No action required.	-	-	-	-
Eccles Sports Club	No current issues.	No action required.	-	-	-	-
Eccles Sports Ground	• Poor quality youth 9v9 pitches. • Pitches used to over capacity at peak times.	• Assess pitches using Pitch Power. • Seek resources to improve maintenance to enhance capacity.	Aylesford PC	PP	£100 per annum for Pitch Power. £2,000 per pitch per annum.	High
Frog Bridge	No current issues.	No action required.	-	-	-	-

Site	Issues	Action	Lead	Partners	Resources	Priority
Hugh Christie College	'3G' pitch is not sports lit	Review the need for floodlights	Hugh Christie College	TMBC	£50,000 if required	High
Igtham Playing Field	Poor quality adult pitch	• Assess pitch using Pitch Power. • Seek resources to improve maintenance to enhance capacity.	Igtham PC	PP	£100 per annum for Pitch Power. £2,000 per annum.	High
Judd School	No current issues.	No action required.	-	-	-	-
K-Sports	Sole use of the site for London City Lionesses FC	Re-deploy displaced demand by developing access to school pitches	TMBC	Schools	-	High
King George's Field, Platt	• 'Poor' quality youth 11v11 pitch. 'Poor' quality changing.	• Assess pitches using Pitch Power. • Seek resources to improve maintenance to enhance capacity. Upgrade changing facilities	Platt PC	PP FF	£100 per annum for Pitch Power. £2,000 per annum. £300,000 for changing.	High
Kings Hill Sports Park	Adult, youth 9v9 and mini 7v7 pitches used to over capacity at peak times.	Re-schedule fixtures to spread the peak period.	TMActive	-	-	Medium
Larkfield Recreation Ground	'Poor' quality youth 11v11, youth 9v9, mini 7v7 and mini 5v5 pitches.	• Assess pitches using Pitch Power. Seek resources to improve maintenance to enhance capacity.	Larkfield PC	PP	£100 per annum for Pitch Power. £2,000 per pitch per annum.	High
Larkfield Sports Club	No current issues.	No action required.	-	-	-	-
Leigh Academy Tonbridge	No current issues.	No action required.	-	-	-	-
Leybourne Chase	Youth 9v9 and mini 5v5 pitches used to over capacity at peak times.	• Assess pitches using Pitch Power. Seek resources to improve maintenance to enhance capacity.	Leybourne PC	PP	£100 per annum for Pitch Power. £2,000 per pitch per annum.	High
Longmead Stadium	No current issues.	No action required.	-	-	-	-
Malling School	No current issues.	No action required.	-	-	-	-
Mereworth Recreation Ground	No current issues.	No action required.	-	-	-	-

Site	Issues	Action	Lead	Partners	Resources	Priority
New Road Recreation Ground	No current issues.	No action required.	-	-	-	-
Peter's Village Playing Field	Mini 5v5 pitch used to over capacity at peak times.	• Assess pitches using Pitch Power. • Seek resources to improve maintenance to enhance capacity.	Trenport Develop	PP	£100 per annum for Pitch Power. £2,000 per annum.	High
Potter Mede Sports Ground	No current issues.	No action required.	-	-	-	-
Potyns Field	No current issues.	No action required.	-	-	-	-
Racecourse Sports Ground	• Youth 9v9, mini 7v7 and mini 5v5 pitches used to over capacity at peak times. • Flooding issues.	• Assess pitches using Pitch Power. • Seek resources to improve maintenance to enhance capacity. • Consider options for accessing pitches at Tonbridge School.	TMBC	PP	£100 per annum for Pitch Power. £2,000 per pitch per annum.	High
Snodland Community Centre	No current issues.	No action required.	-	-	-	-
Stone House Field	Youth 11v11 pitch used to over capacity at peak times	Reschedule Borough Green Junior FC fixtures to other sites with spare capacity.	Borough Green JFC	-	-	Medium
Swanmead Sports Ground	Mini 7v7 pitches used to over capacity at peak times	• Assess pitches using Pitch Power. • Seek resources to improve maintenance to enhance capacity.	Trenport Develop-ment	PP	£100 per annum for Pitch Power. £2,000 per annum.	High
Tonbridge Farm	No current issues.	No action required.	-	-	-	-
Tunbury Recreation Ground	• 'Poor' quality mini 5v5 pitches. • Pitches used to over capacity at peak times. • 'Poor' quality changing	• Assess pitches using Pitch Power. • Seek resources to improve maintenance to enhance capacity.	Aylesford PC	PP	£100 per annum for Pitch Power. £2,000 per pitch per annum.	High

Site	Issues	Action	Lead	Partners	Resources	Priority
Vizards Sports Ground	• 'Poor' quality changing. • Unsecured community access.	• Investigate new changing facilities . • Secure a formal Community Use Agreement.	Judd School	FF TMBC	£785,000 for changing	High
Wateringbury Playing Field	• 'Poor' quality pitches. • Youth 9v9 pitch used to over capacity at peak times. • 'Poor' quality changing	• Assess pitches using Pitch Power. • Seek resources to improve maintenance to enhance capacity.	Watering-bury PC	PP	£100 per annum for Pitch Power. £2,000 per pitch per annum.	High
West Malling Village Hall	No current issues.	No action required.	-	-	-	-
Wrotham School	No current issues.	No action required.	-	-	-	-

5.13.4 Potential project impact

The football projects with the potential to have the greatest impact on identified needs and deficiencies are as follows:

- Addressing the capacity shortfall issues arising from flooding at the Racecourse Sports Ground by developing access to the grass pitches at Tonbridge School would solve an issue that is occurring with increasing frequency.
- Quality improvements at Larkfield Recreation Ground would add capacity to a number of 'poor' quality pitches and eliminate local deficiencies.
- Providing proper changing facilities at Vizards Sports Ground would unlock the full potential of the rugby-compliant '3G' pitch for football and rugby and external funding could be used to leverage a formal community use agreement.

6 CRICKET PITCH NEEDS

6.1 Key stakeholders

The key stakeholders delivering cricket in Tonbridge and Malling are:

- ***Kent Cricket:*** Kent Cricket manages recreational cricket in the county, from its grass-roots foundations through to the interface with the first-class game.
- ***Kent Cricket-affiliated clubs:*** There are 20 affiliated clubs in Tonbridge and Malling, who collectively run 47 men's teams, five women's teams, 50 junior boy's teams and eight junior girl's teams.
- ***Pitch providers:*** Pitches in the borough are managed and maintained by the borough council, schools and voluntary sector clubs.

6.2 Strategic context

6.2.1 National cricket strategy

The England and Wales Cricket Board's (ECB) strategy for 2020 -2024 *'Inspiring Generations'* (2019) contains the following priorities and activities:

Grow and nurture the core: The following will be prioritised:
- A new investment fund for County Cricket Boards.
- Investment in club facilities.
- Further investment in county competitions.

Inspire through elite teams: The following will be prioritised:
- Increasing investment in the county talent pathway.
- Incentivising the counties to develop England players.
- Driving the performance system through technology and innovation.
- Creating heroes and connect them with a new generation of fans.

Make cricket accessible: The following will be prioritised:
- Creating a new digital community for cricket.
- Installing non-traditional playing facilities in urban areas.
- Continuing to deliver the South Asian Action Plan.
- Launching a new participation product linked to the new 100-ball competition.

Engage children and young people: The following will be prioritised:
- Doubling cricket participation in primary schools.
- Delivering a compelling and coordinated recreational playing offer from age five upwards.
- Developing safeguarding to promote safe spaces for children and young people.

Transform women and girl's cricket: There will be a structured pathway for women and girls in both softball and hardball cricket that will include:
- Growing the base through participation and facilities investment.
- Launching centres of excellence and a new elite domestic structure.
- Investing in girls' county age group cricket.
- Delivering a girls' secondary school programme.

Support our communities: The following will be prioritised:

- Doubling the number of volunteers in the game.
- Creating a game-wide approach to Trusts and Foundations through the cricket network.
- Developing a new wave of officials and community coaches.
- Increasing participation in disability cricket.

6.2.2 Neighbouring local authorities

Pitch needs assessments in neighbouring local authorities highlighted the following:

Maidstone Borough Council

The *'Maidstone Pitch Strategy'* (2019) identifies that 'there is sufficient accessible and secured provision of cricket pitches to meet both current and future needs'.

Tunbridge Wells Borough Council

The *'Tunbridge Wells Playing Pitch strategy 2017 - 2033'* (2017) identifies that 'overall across the borough there is sufficient current supply to meet current and future demand for cricket'.

Sevenoaks District Council

The *''Sevenoaks Playing Pitch Strategy'* (2018) concludes that 'there is an adequate number of squares and wickets to meet present demand and spare capacity in the number of wickets on community use facilities for adequate strategic reserve. There will be sufficient supply to meet demand in 2035 if current provision is retained'.

Gravesham Borough Council

The *'Gravesham Playing Pitch Strategy'* (2016) identifies that 'overall current demand in Gravesham is being met, but there is a slight shortfall of match sessions for future demand'.

Medway Council

The *'Medway Playing Pitch Strategy'* (2019) concluded that 'The current picture for accessible grass wicket provision, shows that there is a large surplus of spare capacity. Given the significant current surplus for available and secured cricket provision across the study area, it is clear that there is enough accessible community use cricket provision to meet future demand for grass roots cricket'.

6.2.3 Implications of the strategic context

The implications of the strategic context for cricket in Tonbridge and Malling are as follows:

- ***Active, healthy communities:*** There is strong policy support for the creation of active, healthy communities, including the provision of affordable accessible facilities with appropriate activity programmes.
- ***Active design:*** Ensuring that the community provision creates opportunities for active travel and an attractive range of co-located facilities is embedded in local and wider policies.
- ***Protect and retain:*** Local and national planning policy is supportive of protecting and retaining sports facilities for which there is an assessed need.
- ***Integration with health and social care:*** Closer links with the health and social care system, to ensure that there is better integration between the needs of low participant groups and the sport and physical activity opportunities provided is a strong theme.
- ***Low participant groups:*** There is universal recognition of which groups have lower engagement with sport and physical activity and a shared policy commitment to address this.

6.3 Cricket demand in Tonbridge and Malling

6.3.1 Expressed demand

The information on cricket clubs and teams based in Tonbridge and Malling was supplied by the ECB through its 'Play Cricket' database, cross-referenced to a local clubs survey. A questionnaire survey was circulated to all ECB-affiliated Cricket clubs in Tonbridge and Malling. The following 13 clubs responded, collectively representing 89.1% (98 out of 110) of the teams in the borough:

- Cowdrey Cricket Club
- Hadlow Cricket Club
- Holborough Anchorians Cricket Club
- Holcombe and Bluebell Hill Cricket Club
- Kings Hill Cricket Club
- Offham Cricket Club
- Platt Junior Cricket Club
- Plaxtol Cricket Club
- Stonehouse Cricket Club
- Telston and Mereworth Cricket Club
- Tonbridge Cricket Club
- Tonbridge Foresters Cricket Club
- Town Malling Cricket Club

The following clubs affiliate to Kent Cricket and play in Tonbridge and Malling. Any grounds used outside the borough are marked in italics:

Club	Home Ground(s)	Open age teams	Adult female teams	Mixed junior teams	Junior female teams
Addington Village Cricket Club	Addington Village CC	2	0	3	0
Cowdrey Cricket Club	Swanmead Sports Ground *Sevenoaks Weald*	4	1	8	1
Hadlow Cricket Club	Hadlow CC	5	0	0	0
Holborough Anchorians CC	Holborough Park	3	0	0	0
Holcombe and Bluebell Hill CC	Bluebell Hill CC	3	0	3	0
Hildenborough Cricket Club	Riding Lane Recreation Ground	1	0	0	0
Kings Hill Cricket Club	Kings Hill Cricket Club Leybourne Cricket Club	6	1	12	1
Leybourne Cricket Club	Offham Cricket Club	1	0	0	0
Offham Cricket Club	Offham Cricket Club Holborough Park	5	0	5	0
Platt Junior Cricket Club	Stonehouse Field	1	1	4	0
Plaxtol Cricket Club	Fairlawn Park	2	0	6	0
Shipbourne Cricket Club	Shipbourne Cricket Club	2	0	0	0
Snodland Community CC	The Cricket Meadow	1	0	0	0
Stonehouse Cricket Club	Stonehouse Field	1	0	0	0
Telston and Mereworth CC	Mereworth Recreation Ground	1	0	0	0
Tonbridge Cricket Club	Tonbridge Cricket Club	3	0	4	3
Tonbridge Foresters CC	Tonbridge Farm Recn. Ground	1	0	0	0
Town Malling Cricket Club	Old County Ground	3	2	5	3
Wateringbury Cricket Club	Wateringbury Playing Fields	1	0	0	0
Wrotham St. George's CC	Wrotham Cricket Ground	1	0	0	0
TOTALS	***-***	***47***	***5***	***50***	***8***

The number of teams by sub-area is as follows:

Sub-area	Open age teams	Adult female teams	Mixed junior teams	Junior female teams
Tonbridge and surrounds	16	1	15	5
The Mallings and surrounds	31	4	35	3
TONBRIDGE & MALLING	***47***	***5***	***50***	***8***

There are no Disability Champion Clubs in the borough, but Telstone and Mereworth CC offers 'a refuge for club cricketers unable to play in other places'.

6.3.2 Displaced demand

Displaced demand relates to play by teams or other users of playing pitches from within the study area which takes place outside of the area and vice versa. Cowdrey CC uses a pitch in Sevenoaks for its Third XI matches. There is no imported demand, so net displaced demand is one exported team.

6.3.3 Unmet demand

Unmet demand takes a number of forms:

- Teams may have access to a pitch for matches but nowhere to train or vice versa.
- Some pitches may be unavailable to the community.
- The poor quality and consequent limited capacity of pitches in the area and/or a lack of provision and ancillary facilities which meet a certain standard of play/league requirement.

Consultation with local clubs indicated that a total of 16 additional teams of all age groups could be accommodated in Tonbridge and Malling if the quality and quantity of pitch provision was improved, an increase of 14.5% from the number of existing teams.

Club	*Open age teams*	*Adult female teams*	*Mixed junior teams*	*Junior female teams*
Holcombe and Bluebell Hill CC	1	1	1	1
Kings Hill Cricket Club	0	0	0	3
Plaxtol Cricket Club	0	0	3	1
Tonbridge Cricket Club	0	1	1	3
TOTALS	***1***	***2***	***5***	***8***

6.3.4 Latent demand

Whereas unmet demand is known to currently exist latent demand is demand that evidence suggests may be generated from the current population should they have access to more or better provision. There is no evidence of latent demand for cricket in Tonbridge and Malling.

6.4 Cricket supply in Tonbridge and Malling

6.4.1 Cricket facilities quantity

Provision of cricket pitches in Tonbridge and Malling is set out below. The pitches included in the analysis are defined as natural grass or non-turf pitches (shown in brackets).

A link to ECB technical guidance is:

https://cricketwales.org.uk/documents/docs/ecb-guidelines-for-construction-and-maintenance-of-pitches-and-outfields-831.pdf

- ***Available for community use and used:***

Site	*Address*	*Pitches*	*Wickets*	*Sub-area*
Addington Village CC	Park Road, Addington ME19 5BQ	1	17	Mallings
Bluebell Hill CC	Common Road, Bluebell Hill ME5 9RG	1	11(1)	Mallings
Fairlawne Park	School Lane, Plaxtol TN15 0QD	1	8	Tonbridge
Hadlow CC	Common Road, Hadlow TN11 0JE	1	9	Tonbridge
Holborough Park	Holborough Road, Snodland ME6 5PJ	1	9	Mallings
Kings Hill Cricket Club	Tiffen Way, King's Hill ME19 4GZ	1	14	Mallings
Leybourne Cricket Club	Rectory Lane North, Leybourne ME19 5HD	1	8(1)	Mallings
Mereworth Recreation Ground	The Street, Mereworth ME18 5LU	1	7	Mallings
Offham Cricket Club	Church Road, Offham ME19 5NY	1	5	Mallings
Old County Ground	Norman Road, West Malling ME19 6RL	1	12	Mallings

Site	Address	Pitches	Wickets	Sub-area
Riding Lane Recreation Ground	Riding Lane, Hildenborough TN11 9HY	1	5	Tonbridge
Shipbourne Cricket Club	Fatting Pen Field, Trottiscliffe TN11 9PF	1	7	Tonbridge
Stonehouse Field	Long Mill Lane, St. Mary Platt TN15 8LG	1	9(1)	Tonbridge
Swanmead Sports Ground	Swanmead Way, Tonbridge TN9 1PP	1	12	Tonbridge
The Cricket Meadow	Rocfort Road, Snodland ME6 5TF	1	3	Mallings
Tonbridge Cricket Club	Welland Road, Tonbridge TN10 3TA	1	12	Tonbridge
Tonbridge Farm Sports Grd.	Darenth Road, Tonbridge TN10 3JF	1	9	Tonbridge
Wateringbury Playing Fields	Fields Lane, Wateringbury ME18 5RS	1	7	Tonbridge
Wrotham Cricket Ground	High Street, Wrotham TN15 7AH	1	6	Mallings
TOTAL	***-***	***19***	***166(3)***	***-***

- ***Pitches where use has recently been discontinued:*** These are as follows:

Site	Address	Pitches	Wickets	Sub-area
Ditton Community Centre	Kiln Barn Road, Aylesford ME20 6AH	1	6	Mallings
Racecourse Sports Ground	The Slade, Tonbridge TN9 1HR	1	8	Tonbridge
TOTAL	***-***	***2***	***14***	***-***

- ***Not available for community use:***

Site	Address	Pitches	Wickets	Sub-area
Hayesbrook Academy	Brook Street, Tonbridge TN9 2PH	1	(1)	Tonbridge
Hilden Grange School	Dry Hill Park Road, Tonbridge TN10 3BX	1	6	Tonbridge
Judd School	Brook Street, Tonbridge TN9 2PN	1	6(1)	Tonbridge
Sackville School	Tonbridge Road, Hildenborough TN11 9HN	1	(1)	Tonbridge
The Holmesdale School	Malling Road, Snodland ME6 5HS	1	(1)	Mallings
Tonbridge School	London Road, Tonbridge TN10 3AD	9	42(3)	Tonbridge
Weald of Kent Grammar Sch.	Tudeley Lane, Tonbridge TN9 2JP	1	(1)	Tonbridge
Wrotham School	Borough Green Road, Wrotham TN15 7RD	1	(1)	Mallings
TOTAL	***-***	***16***	***54(9)***	***-***

- ***Provision by sub-area:*** Pitches with community use and used by sub-area are as follows:

Sub-area	Population	No. Pitches	Pitches per capita	No. wickets	Wickets per capita
Tonbridge	56,018	9	1: 6,224	79	1: 709
Mallings	76,182	10	1: 7,618	90	1: 846
TONBRIDGE & MALLING	***132,200***	***19***	***1: 6,958***	***169***	***1: 782***

6.4.2 Cricket facilities quality

The qualitative analysis of cricket pitches and facilities in Tonbridge and Malling involved visits to all cricket pitches during the playing season, to undertake the non-technical visual inspections produced by the ECB for Sport England's *'Playing Pitch Strategy Guidance'* (2013). The assessment evaluated the condition of:

- ***Grass wickets:*** This includes presence of line markings, evidence of rolling, grass cut and height, repaired wickets, grass coverage and ball bounce.
- ***Outfield:*** This includes grass coverage, length of grass, evenness and evidence of unofficial use or damage to the surface.
- ***Non-turf pitches:*** This includes integration with the surrounding grass, evenness, stump holes any evidence of moss, tears or surface lifting and ball bounce.
- ***Changing facilities:*** This includes the presence or absence of umpires' provision, toilets, hot/cold water, heating and an assessment of the condition of the building.
- ***Non-turf practice nets:*** This includes integration with the surrounding grass, surface quality, ball bounce, safety and integrity of the steel frame and nets and safety signage.

The assessment generates a 'score' for each site. The percentage scores generated equate to ratings of 'Good' for scores of 81% or more (shaded green in the table below) 'Standard' for scores of 80% - 51% (shaded yellow in the table below) and 'Poor' for scores of 50% or below (denoted by shaded red in the table below). Blank cells in the table mean that the feature concerned is absent from the site in question. The scores are as follows:

Site	*Wicket*	*Non-turf*	*Outfield*	*Changing*	*Practice nets*
Addington Village CC	Standard	None	Standard	Good	Good
Bluebell Hill CC	Good	Good	Standard	Good	None
Fairlawne Park	Good	None	Standard	Poor	Standard
Hadlow CC	Good	None	Good	Good	None
Holborough Park	Standard	None	Standard	Standard	None
Kings Hill Cricket Club	Good	None	Good	Standard	Good
Leybourne Cricket Club	Good	None	Standard	Standard	Good
Mereworth Recreation Ground	Standard	None	Standard	Good	None
Offham Cricket Club	Standard	None	Standard	Standard	Standard
Old County Ground	Standard	None	Standard	Good	None
Riding Lane Recreation Ground	Standard	None	Poor	Standard	None
Shipbourne Cricket Club	Standard	None	Standard	Standard	None
Stonehouse Field	Standard	Poor	Standard	Poor	Poor
Swanmead Sports Ground	Good	None	Standard	Poor	Good
The Cricket Meadow	Standard	None	Poor	Standard	Poor
Tonbridge Cricket Club	Good	None	Good	Good	Good*
Tonbridge Farm Recn. Ground	Poor	None	Standard	Standard	None
Wateringbury Playing Fields	Poor	None	Poor	Poor	None
Wrotham Cricket Ground	Standard	None	Standard	Good	None

* Nets at Hilden Grange School adjacent.

6.4.3 Pitch carrying capacity

The carrying capacity of pitches is related to their quality and is expressed as the number of 'match equivalents' that can be accommodated each season. The *'Playing Pitch Strategy Guidance'* indicates the following seasonal carrying capacities for cricket pitches:

- A 'good' quality wicket will accommodate five matches per season, a 'standard' quality wicket will accommodate four and a 'poor' quality wicket will accommodate none.
- 'Good' and 'Standard' quality non-turf pitches accommodate 60 matches per season and a 'poor' quality wicket will accommodate none.
- The seasonal pitch carrying capacity of each cricket site in Tonbridge and Malling is as follows:

The pitch carrying capacity of each site with cricket pitches with community use in Tonbridge and Malling, expressed in seasonal match equivalents, is as follows:

Site	***Grass wickets***	***Artificial wickets***	***Total capacity***
Addington Village CC	17	0	68
Bluebell Hill CC	11	1	115
Fairlawne Park	8	0	40
Hadlow CC	9	0	45
Holborough Park	9	0	45
Kings Hill Cricket Club	14	0	40
Leybourne Cricket Club	8	1	130
Mereworth Recreation Ground	7	0	28
Offham Cricket Club	5	0	20
Old County Ground	12	0	48
Riding Lane Recreation Ground	5	0	20
Shipbourne Cricket Club	7	0	28
Stonehouse Field	9	1	36
Swanmead Sports Ground	12	0	60
The Cricket Meadow	3	0	12
Tonbridge Cricket Club	12	0	60
Tonbridge Farm Recn. Ground	9	0	0
Wateringbury Playing Fields	7	0	0
Wrotham Cricket Ground	6	0	24
TOTALS	***166***	***3***	***819***

6.4.4 Pitch maintenance

The pitches owned and managed by local sports clubs are all maintained by the clubs themselves. This involves a combination of paid grounds staff, external contractors and volunteer help. Council-owned pitches are maintained by the Council's grounds maintenance contractor.

6.4.5 Ownership, management and security of access

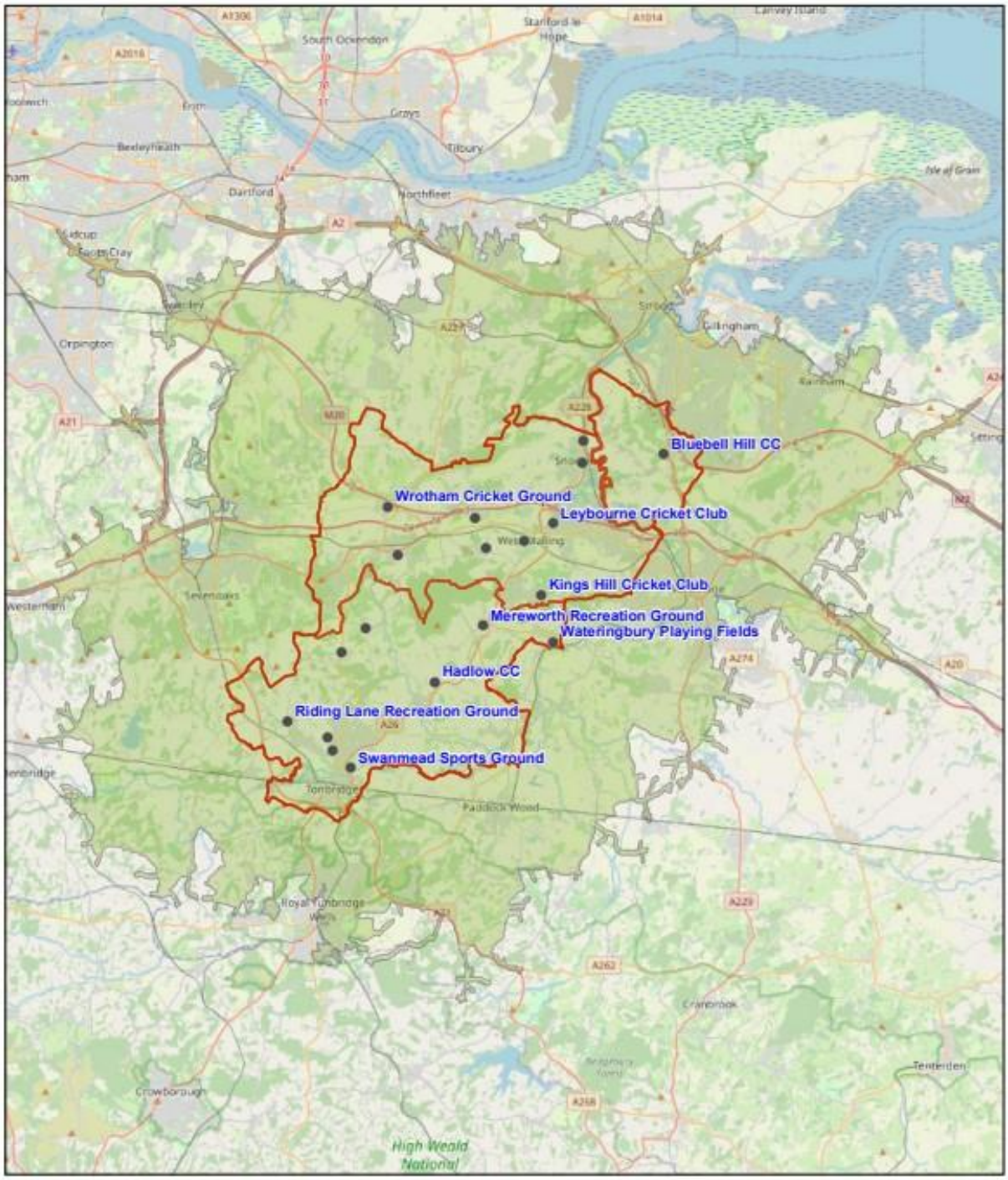
The ownership, management and security of community access of all cricket pitch sites in Tonbridge and Malling is detailed below. Security of access refers to the extent to which community use of the site is protected (through public ownership, planning policy ownership covenants etc.), rather than the security of tenure of specific club users. Sites that are asterisked are protected as Queen Elizabeth II Fields through Fields in Trust. The pitches not available for community use, listed in section 66 above, are all owned and managed by the schools concerned.

Site	*Ownership*	*Management*	*Security of access*
Addington Village CC	Addington Parish Council	Addington Village CC	Secured*
Bluebell Hill CC	Holcombe & Bluebell Hill CC	Holcombe & Bluebell Hill CC	Secured*
Fairlawne Park	Fairlawne Estate	Plaxtol Cricket Club	Secured
Hadlow CC	Hadlow Parish Council	Hadlow Cricket Club	Secured
Holborough Park	Snodland Town Council	Holborough Anchorians CC	Secured
Kings Hill Cricket Club	Kings Hill Cricket Club	Kings Hill Cricket Club	Secured
Leybourne Cricket Club	Leybourne Parish Council	Kings Hill Cricket Club	Secured
Mereworth Recreation Ground	Mereworth Parish Council	Telstone and Mereworth CC	Secured*
Offham Cricket Club	Offham Parish Council	Offham Cricket Club	Secured
Old County Ground	West Malling Parish Council	Town Malling Cricket Club	Secured
Riding Lane Recreation Ground	Hildenborough Parish Council	Hildenborough Cricket Club	Secured
Shipbourne Cricket Club	Shipbourne Cricket Club	Shipbourne Cricket Club	Secured
Stonehouse Field	Platt Parish Council	Stonehouse Cricket Club	Secured*
Swanmead Sports Ground	Tonbridge and Malling BC	Tonbridge and Malling BC	Secured
The Cricket Meadow	Snodland Town Council	Snodland Community CC	Secured
Tonbridge Cricket Club	Tonbridge Cricket Club	Tonbridge Cricket Club	Secured
Tonbridge Farm Recn. Ground	Tonbridge and Malling BC	Tonbridge and Malling BC	Secured
Wateringbury Playing Fields	Wateringbury Parish Council	Wateringbury Cricket Club	Secured*
Wrotham Cricket Ground	Wrotham Parish Council	Wrotham St. George's CC	Secured

6.4.6 Geographical distribution

The geographical distribution of cricket pitches in Tonbridge and Malling has been assessed by identifying catchments to illustrate local level accessibility. This is based on the results of the clubs' survey, which identifies 15-minutes travel time as the typical maximum. Based upon this, the map overleaf shows that the entire local population is within the catchment of at least one pitch.

Tonbridge and Malling - Cricket Pitches 15 minutes drive



2/11/2024

1:400,000

0 2 4 8 mi

0 3.25 6.5 13 km

- Cricket pitches
- 15.0 Minutes
- Sub Areas - Tonbridge Surrounds and Malling Surrounds
- Tonbridge and Malling District Boundary

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6.5 The views of local stakeholders

6.5.1 Kent Cricket

Kent Cricket manages recreational cricket in the county, from its grass-roots foundations to the interface with the first-class game. Consultation with Kent Cricket highlighted that:

- There are 20 clubs with a good geographical spread in the borough.
- There is demand from clubs in nearby London boroughs for facilities in Kent.
- 'Poor' quality pitches should be addressed by a Pitch Power assessment.
- Women and girls cricket is well developed and expanding in the borough.
- There is a severe shortfall in indoor cricket net availability in sports halls in the borough.

6.5.2 Cowdrey Cricket Club

The key comments from the club in response to a questionnaire circulated by Kent Cricket on behalf of the project team were as follows:

- 'With so many juniors we have a lot of wear on our wicket, ideally another ground would help solve this and provide more chances for juniors to play whilst improving our existing wicket'.
- 'We are always receiving enquires about junior membership so we will increase our junior sides along with a girls and women's hardball team'.
- 'We desperately need help improving our clubhouse, improving changing facilities, viewing area this will encourage families to stay around and to have a more community feel for the club'.

6.5.3 Hadlow Cricket Club

The key comments from the club in response to a questionnaire circulated by Kent Cricket on behalf of the project team were as follows:

- 'We do receive enquiries about providing coaching for juniors however currently we direct these parents to other clubs in the borough we know to have strong youth setups'.
- 'We hope to increase membership to ensure we can always fulfil our fixtures'.
- 'We are a village cricket club and pride ourselves on being one of the best village grounds in Kent. We have invested significantly in both the pavilion and playing surface over the past 5 years'.
- 'We have one movable net 'cage' which is wheeled onto the square, used at least once a week'.

6.5.4 Kings Hill Cricket Club

The key comments from the club in response to a questionnaire circulated by Kent Cricket on behalf of the project team were as follows:

- 'We have had to reduce our teams due to not being able to get access to a second ground to assist our Juniors with more matches'.
- 'We really want to increase our female section with the same goal as our males with a good pathway to adult cricket'.

6.5.5 Offham Cricket Club

The key comments from the club in response to a questionnaire circulated by Kent Cricket on behalf of the project team were as follows:

- 'We need access to another ground nearby to enable our Saturday 3rd XI to play league/ regular fixtures. This also significantly limits the number of juniors teams we can run as we don't have sufficient space. We can't expand to run women's or disability cricket that we would wish to do. Other clubs are either unwilling to loan - as maybe they have games - or capacity is already taken up by others'.
- 'We have gone to Maplesden Noakes School in Maidstone (or on occasions to Maidstone Grammar) for junior indoor winter coaching and adult pre-season nets. Holmesdale, The Mallings and Aylesford all have indoor nets but the facilities are not fit for use. In particular the floors in their sport hall do not allow a cricket ball to bounce making it impossible to provide coaching/play of any quality. There are no available facilities at Oakwood Park, Valley Park, The Science - Technology School or Wrotham. We have also needed to try to secure a ground for our 3rd XI as far away as Rochester to play a home match, but this is a real problem as it does not build community/club cohesion when a team is so far from its home base. This team is also a development side for younger players so travel (ensuring a safeguarded travel environment) is very problematic'.
- 'We are an ECB Club Mark accredited club and have detailed and ambitious plans. We have made significant improvements over the last 3 years. We would like some new facilities - an additional ground is on the list(!) as well as enhanced nets - but this is dependent on available space and funding'.
- 'We would like to improve disability access but currently have no space currently to do this. Relocation - we are hub for the local community and many come to watch on a weekend so we would not want to lose this, extend (is the key word) at a nearby site would be ideal. Can't but help notice the sad, huge development now taking place at 40 Acres - a ground to access there would be nice, but it is probably not in the plans. Also, nothing at the large Grange Park development which would be ideally close by. Any suggestions / support would be very gratefully received'.
- 'We have unmet demand for adults 3rd XI/development team, juniors - particularly pre-U11 and dedicated girls teams'.
- 'With a small square and relatively small outfield we are very stretched even to offer what we do. With additional space we could significantly enhance the quality of what we offer. Without additional ground capacity we may lose our 3rd XI and a junior team so it is not just about expansion. Having said this more space + associated facilities = capacity to operate All Stars and Dynamos for pre-U11 and thereby teams into junior women's cricket. Some teams locally take subscriptions and provide 'coaching' for 200+ but provide games etc for only the most able 50. We will not do that, providing open access but just to the numbers for which we have safe, quality capacity. We would just like to be able to do more'.
- 'Worth noting that despite our limitations our U15 side this season are the West Kent Premier League champions, beating all comers including The Mote, Sevenoaks Vine, Holmesdale. In addition, our junior players are all feeding through into our Kent League and Kent Village League teams, so it is also about sustaining and building engagement by adolescents who might easily be attracted away by other 'attractions'. This however requires resource to be a long term, sustainable project'.
- 'We have no separate senior junior/changing so we have a safeguarding changing policy which requires juniors to change before the adults. This is not ideal'.

- ‘There is only one bay in our practice nets, again this presents significant challenges for junior coaching in particular. There is not really sufficient space on the ground, as is, for more’.

6.5.6 Platt Junior Cricket Club

The key comments from the club in response to a questionnaire circulated by Kent Cricket on behalf of the project team were as follows:

- ‘We would like to provide a new non-turf wicket in the next couple of years’.
- ‘Our women and girls’ membership has increased over the past three years’.

6.5.7 Plaxtol Cricket Club

The club commented that ‘there are too many juniors for us to cope with and also challenges around cost of providing coaching vs. ability to pay by those who want to participate’.

6.5.8 Stonehouse Cricket Club

The club commented that ‘equipment for pitch preparation lacking, especially proficient Mower. Funding for servicing mechanical equipment would keep machines working longer and performing better’.

6.5.9 Telstone and Mereworth Cricket Club

The key comments from the club in response to a questionnaire circulated by Kent Cricket on behalf of the project team were as follows:

- ‘We are a friendly-only inclusive club offering a refuge for club cricketers unable to play in other places’.
- ‘We lack resources to have a junior section’.
- ‘It is quite difficult to exist as a village friendly club without league or junior sections. We have no support on our pitch but that's ok. All our aim is to provide a safe environment for those who do not feel welcome in other clubs due to belittling or perceived bullying’.

6.5.10 Tonbridge Cricket Club

The key comments from the club in response to a questionnaire circulated by Kent Cricket on behalf of the project team were as follows:

- ‘We have just produced a new strategy following a committee initiative and have a plan for 16 new coaches from members and parents (the club to fund the coaching courses)’.
- ‘We would like to extend clubhouse for our resident community-based groups (Pre-school weekdays) we currently have links with; Create a new cricket square on next door ground to increase capacity’.
- ‘We have hosted Kent wheelchair cricket matches at the ground. The clubhouse is fully wheelchair and disabled user friendly’.
- ‘Our new female section is increasing with approximately 25-30 players currently’.
- ‘We constructed the ground, main pavilion, cricket square, drainage access road, gates, bridge and fencing and planted the boundary hedges and trees in 1986. We have a long-term lease from TMBC but this is now below 8 years remaining and have been trying to contact the TMBC to extend a new long-term lease’.

- 'We also have regular access to the private Hilden Grange net facility (6 bays) which are of very high quality for both adults and juniors throughout the season'.
- Kent Cricket uses our ground for District tournaments, Kent girls Trials days, Cups and Age group County matches'.
- 'We would like to expand both the outdoor cricket ground and our pavilion (which we use daily for a local pre-school). We cannot develop this until we get agreement to extend our long-term lease which is now below 8 years. We own our pavilion having built it ourselves. We need to agree a long term 25-year lease ideally in order to secure the future of the club and expand the very well-used facility'.

6.5.11 Tonbridge Foresters Cricket Club

The key comments from the club in response to a questionnaire circulated by Kent Cricket on behalf of the project team were as follows:

- ''We need more core members'.
- 'The facilities at Tonbridge Farm are too expensive, rent went up 33% this year. Pitch markings are not consistently good. Outfield is not mowed regularly enough'.

6.5.12 Town Malling Cricket Club

The key comments from the club in response to a questionnaire circulated by Kent Cricket on behalf of the project team were as follows:

- 'We want to change the male toilets in the pavilion to unisex'.
- 'We plan to form an additional U15 boys team'.

6.6 The implications for cricket in Tonbridge and Malling

Analysis of local supply of cricket pitches in Tonbridge and Malling indicates the following:

- ***Displaced demand:*** Cowdrey CC uses a pitch in Sevenoaks for its Third XI matches. There is no imported demand, so net displaced demand is one exported team.
- ***Latent demand:*** 16 additional teams of all age groups could be accommodated in Tonbridge and Malling if the quality and quantity of pitch provision was improved, an increase of 14.5% from the number of existing teams.
- ***Pitch quality:*** The quality of pitches is generally rated as at least 'standard', although two grass pitches and one non-turf pitch are rated as 'poor' quality.
- ***Shared usage:*** Several sites with cricket pitches are also used for football and this causes problems for both sports in the seasonal overlap periods (April-May and August-September).

6.7 Assessment of current needs

6.7.1 The basis of the assessment

To assess whether the current supply of pitches is adequate to meet existing demand an understanding of the situation at all sites available to the community needs to be developed. This is achieved by providing a brief overview for each site, which comprises:

- A comparison between the carrying capacity of a site with how much demand currently takes place there. The carrying capacity of a site is defined as the amount of play it can regularly accommodate without adversely affecting its quality and use. Demand is defined in terms of the number of 'match equivalent sessions' per season at each site.
- An indication of the extent to which pitches are being used during their peak periods.

The site overviews identify the extent to which pitches are:

- ***Being overplayed:*** Where use exceeds the carrying capacity (highlighted in red in the tables below).
- ***Being played to the level the site can sustain:*** Where use matches the carrying capacity (highlighted in yellow in the tables below).
- ***Potentially able to accommodate some additional play:*** Where use falls below the carrying capacity (highlighted in green in the tables below).

In line with ECB guidance, the following assumptions have been made in relation to the number of weekly match equivalents that can be accommodated by different quality pitches:

- Overall capacity is expressed as match equivalents per ***season***, as opposed to per ***week*** for all other pitch types.
- The number of wickets at each site is shown below.
- The supply-demand balance for grass and artificial turf wickets respectively have been assessed separately because there is little or no use of artificial wickets by adult teams, with use confined to junior teams.
- In line with the guidance, it has been assumed that a 'good' quality grass wicket will accommodate five matches per season, a 'standard' quality wicket will accommodate four and a 'poor' quality wicket will accommodate no play.
- 'Good' and 'standard' quality non-turf pitches will accommodate 60 matches per season and a 'poor' quality wicket will accommodate no play.
- Adult teams typically play ten home games per season and junior teams typically play seven home games per season.
- Aspects of each site shaded in red indicate a deficiency, those shaded in yellow indicate that supply and demand are balanced and those shaded in green have some spare capacity.

6.7.2 Grass wickets

Site	Users	Seasonal demand	Seasonal capacity	Seasonal balance	Peak capacity	Peak demand	Peak balance
Addington Village CC	Addington Village CC	41	68	+27	1	1	Balanced
Bluebell Hill CC	Holcombe and Bluebell Hill CC	30	55	+25	1	1	Balanced
Fairlawne Park	Plaxtol CC	62	40	-22	1	1	Balanced
Hadlow CC	Hadlow Cricket Club	50	45	-5	1	1	Balanced
Holborough Park	Holborough Anchorians CC	80	45	-35	1	1	Balanced
Leybourne Cricket Club	Kings Hill CC	40	40	Balanced	1	1	Balanced
Kings Hill Cricket Club	Kings Hill CC	70	70	Balanced	1	1	Balanced
Mereworth Recreation Ground	Telstone and Mereworth CC	10	28	+18	1	1	Balanced

Site	Users	Seasonal demand	Seasonal capacity	Seasonal balance	Peak capacity	Peak demand	Peak balance
Offham Cricket Club	Offham CC Leybourne CC	45	20	-25	1	1	Balanced
Old County Ground	Town Malling CC	106	48	-58	1	1	Balanced
Riding Lane Recreation Ground	Hildenborough Cricket Club	10	20	+10	1	1	Balanced
Shipbourne Cricket Club	Shipbourne Cricket Club	20	28	+8	1	1	Balanced
Stonehouse Field	Platt Junior CC Stonehouse CC	58	36	-22	1	1	Balanced
Swanmead Sports Ground	Cowdrey Cricket Club	60	60	Balanced	1	1	Balanced
The Cricket Meadow	Snodland Community CC	10	12	+2	1	1	Balanced
Tonbridge Cricket Club	Tonbridge Cricket Club	79	60	-19	1	1	Balanced
Tonbridge Farm Recn. Grd.	Tonbridge Foresters CC	10	0	-10	1	1	Balanced
Wateringbury Playing Fields	Wateringbury CC	10	0	-10	1	1	Balanced
Wrotham Cricket Ground	Wrotham St. George's CC	10	24	+14	1	1	Balanced
TOTALS	**-**	***801***	***699***	***-102***	***19***	***19***	***Balanced***

The supply-demand balance of grass cricket pitches by sub-area is as follows:

Sub-area	Seasonal demand	Seasonal capacity	Seasonal balance	Peak capacity	Peak demand	Peak balance
Tonbridge and surrounds	359	278	-81	9	9	Balanced
The Mallings and surrounds	442	421	-21	11	11	Balanced
TONBRIDGE & MALLING	***801***	***699***	***-102***	***20***	***20***	***Balanced***

The key findings are as follows:

- There is a collective seasonal deficit of 102 match equivalent sessions.
- Nine sites show a seasonal deficit although peak usage in the borough is balanced.
- The sub-area analysis shows that seasonal demand exceeds supply in both areas.

6.7.3 Non-turf pitches

Site	Users	Seasonal demand	Seasonal capacity	Seasonal balance	Peak capacity	Peak demand	Peak balance
Bluebell Hill CC	Holcombe and Bluebell Hill CC	21	60	+39	1	1	Balanced
Leybourne CC	Kings Hill CC	51	60	+9	1	1	Balanced
Stonehouse Field	Platt Junior CC	28	0	-28	1	1	Balanced
TOTALS	**-**	***100***	***120***	***+20***	***3***	***3***	***Balanced***

The supply-demand balance of artificial turf cricket wickets by sub-area is as follows:

Sub-area	Seasonal capacity	Seasonal demand	Seasonal balance	Peak capacity	Peak demand	Peak balance
Tonbridge and surrounds	0	28	-28	0	0	Balanced
The Mallings and surrounds	120	72	+48	2	2	Balanced
TONBRIDGE & MALLING	***120***	***100***	***+20***	***7***	***7***	***Balanced***

The key findings are as follows:

- There is collective seasonal spare capacity of 20 match equivalent sessions, although there is a sub-area deficit in Tonbridge.
- Peak usage is balanced in the borough as a whole.

6.8 Assessment of future needs

6.8.1 Population growth

Two scenarios are considered:

- The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).
- Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 or 27.7%.

6.8.2 Potential changes in demand

Changes in demand for cricket in the future can be modelled on a trend-based projection.

- ***National cricket playing survey:*** The ECB's most recent *'National Cricket Playing Survey'* (2022) identified:
  - Up to 2.6 million people are estimated to have played cricket in 2022, including 1.4 million players aged under 16. Growth in children playing cricket has been boosted by the ECB's national programmes to introduce the game to new players, All Stars Cricket and Dynamos Cricket, which welcomed more than 100,000 participants for the second year running in 2022.
  - The number of Women's and Girls fixtures hit a record 20,577 in 2022, almost twice the previous year's total of 10,603. There were 220 Women's and Girls' leagues (versus 152 in 2021) following growth of more than 50% since 2019 in the number of cricket clubs with a Women's section and/or a Girls' section. 1,079 clubs now have a Women's section while 755 have a Girls' section (up from 744 and 465 respectively in 2019).

- ***Unmet demand:*** Local clubs estimates of additional team formation potential indicate overall levels of unmet demand of 16 teams, representing a 14.5% increase over actual team numbers.

6.8.3 Site-specific pressures

Tonbridge and Malling Borough Council needs to identify sites upon which it can deliver its housing targets. Whilst planning policy offers protection to playing pitches, some sites may be vulnerable unless it can be proven that they are needed to accommodate existing or future shortfalls in supply or serve some other green space functions. At present, the analysis in section 6.7 above shows that all sites are used to capacity in the peak periods, so the case for retention is strong.

6.8.4 Potential changes in supply

There are no known potential changes in cricket pitch supply:

6.8.5 Existing spare capacity

There is no effective spare capacity at peak times based on the assessment.

6.8.6 Future cricket pitch needs

Future cricket pitch needs to 2041 are modelled below using 'Team Generation Rates' (TGRs), which identify how many people in a specified age group in the borough are required to generate one team. These are then applied to projected changes in population to identify the likely number of teams in the future. The projections include provision for the unmet demand identified by local clubs.

- ***ONS projections:*** The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).

Team type	*Age range*	*Current population*	*Current teams*	*Unmet demand*	*TGR*	*Population 2041*	*Teams 2041*	*Extra teams*
Open age	18-55	30,618	47	1	1: 638	32,541	51	+3
Adult females	18-55	32,606	5	2	1: 4,658	34,252	8	+1
Mixed junior	7-17	10,411	50	5	1: 189	10,424	55	0
Junior females	7-17	9,631	8	8	1: 602	9,578	16	0

- ***Housing projections:*** Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). At an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 or 27.7%.

Team type	*Age range*	*Current population*	*Current teams*	*Unmet demand*	*TGR*	*Population 2041*	*Teams 2041*	*Extra teams*
Open age	18-55	30,618	47	1	1: 638	39,110	61	+13
Adult females	18-55	32,606	5	2	1: 4,658	41,649	9	+2
Mixed junior	7-17	10,411	50	5	1: 189	13,298	70	+15
Junior females	7-17	9,631	8	8	1: 602	12,302	20	+4

6.8 Key findings and issues

6.9.1 What are the main characteristics of current supply and demand?

- ***Demand:*** There are 20 affiliated cricket clubs in the borough, collectively fielding 47 open age teams, five women's teams, 50 mixed teams and eight junior female teams.
- ***Unmet demand:*** Two clubs have significant waiting lists for junior players.

- ***Displaced demand:*** There is net exported demand of one team from Tonbridge and Malling.
- ***Supply:*** There are 19 cricket pitch sites with community use and used in the borough, plus two sites where usage was recently discontinued and nine education sites where there is no current community use.
- ***Pitch quality:*** The quality of pitches is variable, with two sites rated as 'poor' quality. Six pavilions are also rated as 'poor' quality.
- ***Shared usage:*** Several sites with cricket pitches are also used for football and this causes problems for both sports in the seasonal overlap periods (April-May and August-September).

6.9.2 Is there enough accessible and secured community use to meet current demand? ***NO***

- ***Seasonal pitch capacity:*** There is a seasonal deficit for grass wickets of 102 match equivalent sessions. This is partially offset by collective seasonal spare capacity of 20 match equivalent sessions at artificial turf pitches.
- ***Peak time pitch capacity:*** Peak time pitch capacity is balanced.

6.9.3 Is the accessible provision of suitable quality and appropriately maintained? ***NO*** - Pitches at three sites are rated as 'poor' quality,

The grass wickets at Tonbridge Farm Recreation Ground and Wateringbury Playing Fields are both rated as 'poor' quality, as is the non-turf pitch at Stonehouse Field. If these were improved to 'standard' quality, it would provide an additional 64 seasonal match equivalent sessions on the grass pitches and 60 seasonal match equivalent sessions on the non-turf pitch.

6.9.4 What are the main characteristics of future supply and demand?

- ***Population growth:*** Two scenarios are considered:
  - The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).
  - Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 or 27.7%.

- ***Changes in demand:*** Projecting future need based on current demand patterns (including identified unmet demand) is a reasonable basis for forecasting.
- ***Changes in supply:*** There are no known proposed changes in supply.
- ***Existing spare capacity:*** There is no peak time spare capacity as present.
- ***Future needs:*** Based on the two projected population growth scenarios, there will be a need for the following number of additional seasonal match equivalent sessions by 2041:

Pitch type	*ONS Projections*	*Housing projections*
Open age	30	130
Adult females	10	20
Mixed junior	0	105
Junior females	0	28
TOTALS	***40***	***283***

6.9.5 Is there enough accessible and secured provision to meet future demand? ***NO*** - There is no effective spare capacity at present.

There is insufficient accessible and secured provision to meet future demand at present, but additional capacity could be created in six ways:

- ***New pitch provision:*** Securing the provision of additional pitches at part of new housing developments in the borough.
- ***Reinstating existing pitches:*** There are disused pitches at Ditton Community Centre and the racecourse Sports Ground that could be reinstated and which would add 56 seasonal match equivalent sessions to overall supply.
- ***Pitch quality improvements:*** The grass wickets at Tonbridge Farm Recreation Ground and Wateringbury Playing Fields are both rated as 'poor' quality, as is the artificial turf pitch at Stonehouse Field. If these were improved to 'standard' quality, it would provide an additional 64 seasonal match equivalent sessions on the grass pitches and 60 seasonal match equivalent sessions on the non-turf pitch.
- ***Installation of non-turf pitches:*** Installing non-turf pitches at sites that are currently used to over capacity would help to expand seasonal carrying capacity for junior play, although would have little impact on peak time provision if provided as part of an existing square.
- ***Using pitches on school sites with no community use:*** There are 16 pitches on school sites with no community at present, collectively providing 54 grass wickets and nine non-turf pitches. Gaining access to these would provide 840 seasonal match equivalent sessions to the available supply (less any use by the schools themselves).

6.10 Scenario Testing

6.10.1 Introduction

Based upon the key findings and issues identified above, a number of scenarios have been examined, to identify the optimum approach to addressing needs.

6.10.2 Scenario 1: Increasing capacity by reinstating disused pitches.

- ***Rationale:*** There are disused cricket pitches at Ditton Community Centre and the Racecourse Sports Ground. If these were reinstated as 'standard' quality pitches, they would collectively add 56 seasonal and 2 peak period match equivalent sessions to overall supply.
- ***Advantages:*** The advantages of this scenario are as follows:
  - The collective seasonal deficit of 102 match equivalent sessions on grass wickets at secured sites in the borough as a whole would be reduced by 56 match equivalent sessions to 46 match equivalent sessions.
  - Two additional peak time match equivalent sessions would be created.
  - There is one site in each sub-area, providing a geographical spread of extra capacity.
  - The improvements to the pitches could be achieved at relatively low cost.
- ***Disadvantages:*** The disadvantages of this scenario are as follows:
  - Additional investment would be required to improve maintenance standards.
  - Both sites also accommodate football use so there would be fixture clashes during the seasonal overlap periods.
- ***Conclusions:*** This scenario offers an attractive solution in conjunction with other options to meeting additional cricket pitch demand in Tonbridge and Malling.

6.10.3 Scenario 2: Increasing capacity by improving the 'standard' and 'poor' quality pitches to 'good' quality.

- ***Rationale:*** Improving all the pitches rated as 'standard' and 'poor' quality to 'good' quality would provide an extra 220 seasonal match equivalent sessions, although no extra peak-time match equivalent sessions.

Site	*Current capacity*	*Extra potential capacity*	*Total capacity*
Addington Village CC	68	17	85
Bluebell Hill CC	115	0	115
Fairlawne Park	40	0	40
Hadlow CC	45	0	45
Holborough Park	45	9	54
Kings Hill Cricket Club	70	0	70
Leybourne Cricket Club	40	0	40
Mereworth Recreation Ground	28	7	35
Offham Cricket Club	20	5	25
Old County Ground	48	12	60
Riding Lane Recreation Ground	20	5	25
Shipbourne Cricket Club	28	7	35
Stonehouse Field	36	9	45
Swanmead Sports Ground	60	0	60
The Cricket Meadow	12	3	15
Tonbridge Cricket Club	60	0	60
Tonbridge Farm Recn. Ground	0	45	45
Wateringbury Playing Fields	0	35	35
Wrotham Cricket Ground	24	6	30
TOTALS	***759***	***160***	***919***

- ***Advantages:*** The advantages of this scenario are as follows:

  - The collective seasonal deficit of 102 match equivalent sessions on grass wickets at secured sites in the borough as a whole would be eliminated.
  - The pitch improvements should be achievable at relatively low cost, compared with providing entirely new facilities.

- ***Disadvantage:*** The disadvantage of this scenario is that additional investment would be required to improve maintenance standards.
- ***Conclusions:*** This scenario offers an attractive solution in conjunction with other options to meeting additional cricket pitch demand in Tonbridge and Malling.

6.10.4 Scenario 3: Installation of additional non-turf pitches

- ***Rationale:*** Installing non-turf pitches at sites that are currently used to over-capacity would help to expand seasonal carrying capacity for junior play, although would have little impact on peak time provision if provided as part of an existing square.
- ***Advantages:*** The advantages of this scenario are as follows:

  - The pitches can be installed at relatively low cost (£8,000 - £10,000 per pitch).

- They have the potential to accommodate 60 match equivalent sessions per season.
- Pitch maintenance costs are relatively low compared with natural turf.

- ***Disadvantages:*** The disadvantages of this scenario are as follows:

  - Non-turf wickets are used primarily for junior matches, so they would have limited impact on addressing capacity issues in relation to adult play.
  - Unless there is space to accommodate non-turf pitches away from the main square, they would not address peak-time deficiencies because they could not be used simultaneously with the grass wickets.

- ***Conclusions:*** This scenario should be examined further on a site-by-site basis.

6.10.5 Scenario 4: Using pitches on school sites with no community use

- ***Rationale:*** There are 16 cricket pitches on school sites, collectively providing 54 grass and nine non-turf pitches that have no community at present. Gaining access to these would provide 216 seasonal match equivalent sessions on grass pitches and 540 seasonal match equivalent sessions on non-turf pitches to the available supply (less any use by the schools themselves).
- ***Advantages:*** The advantages of this scenario are as follows:

  - Up to 756 additional seasonal match equivalent sessions and 16 peak time match equivalent session would be created.
  - There would be opportunities to establish closer school-club links if community-based clubs were playing on the school site.
- ***Disadvantages:*** The disadvantages of this scenario are as follows:

  - The pitches are already used by the schools themselves, so the overall capacity is reduced.
  - The sites are not subject to formal Community Use Agreements so secured access would not be secured.
- ***Conclusions:*** This scenario offers some limited possibilities for meeting additional cricket pitch demand in Tonbridge and Malling.

6.10.6 Scenario 5: The impact of meeting women and girls team targets

- ***Rationale:*** The number of Women's and Girls fixtures hit a record 20,577 in 2022, almost twice the previous year's total of 10,603. There were 220 Women's and Girls' leagues (versus 152 in 2021) following growth of more than 50% since 2019 in the number of cricket clubs with a Women's section and/or a Girls' section. 1,079 clubs now have a Women's section while 755 have a Girls' section (up from 744 and 465 respectively in 2019).
- ***Implications:*** If the recent doubling in women and girl's cricket participation rates is projected forward over the next five years and this is reflected in Tonbridge and Malling, the implications will be as follows:

  - Women's teams will double from seven (current and unmet demand) to 14 by 2028 and girl's teams will double from 16 (current and unmet demand) to 32 by 2028.
  - The additional teams will create demand for an extra 70 seasonal match equivalent sessions for women and 112 seasonal match equivalent sessions for girls. This will require additional pitch capacity equivalent to 36 additional 'good' quality grass wickets or three non-turf pitches.

- ***Options:*** The options for providing additional pitch capacity are as follows.

  - As Scenario One above, re-instating disused pitches.
  - As Scenario Two above, improving pitch quality and carrying capacity elsewhere.
  - As Scenario Three above, providing additional non-turf pitches.
  - As Scenario four above, developing access to school facilities.
- ***Conclusions:*** All four options for achieving additional capacity are feasible, but need to be considered in the context of an existing shortage of capacity and extra future demand arising from population increases.

6.11 Policy recommendations

6.11.1 Introduction

The recommendations in relation to cricket are made in the context of the National Planning Policy Framework (NPPF), which stipulates that existing open space including playing pitches, should not be built upon unless:

- An assessment has taken place which has clearly shown the open space to be surplus to requirements, or;
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality, in a suitable location, or;
- The development is for alternative sport and recreation provision, the needs for which clearly outweighs the loss.

6.11.2 Protect

Recommendation 1 - Safeguarding existing provision: The Tonbridge and Malling PPS comprises a robust and evidence-based assessment of current and future needs for cricket in the borough. The PPS identifies a need for all current cricket pitch sites to be retained and protected on the basis of the specific identified roles that each can play in delivering the needs of the sport in Tonbridge and Malling both now and in the future. It is therefore recommended that planning policies continue to support the retention of all sites based upon the evidence in the PPS. If any pitch sites do become the subject of development proposals, this will only be permissible if they are replaced and meet policy exception E4 of Sport England's Playing Fields Policy. This states that 'the playing field or playing fields which would be lost as a result of the proposed development must be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of development'.

6.11.3 Enhance

Recommendation 2 - Improving existing 'standard' and 'poor' quality pitches: The pitches at 12 sites are rated as 'standard' quality. If improved to 'good' quality, it would add 160 seasonal match equivalent sessions to overall capacity, eliminating the current deficit of 102 sessions. It is recommended that the site owners should be supported to improve pitch quality, including the receipt of developer contributions (see below) where the usage capacity would be enhanced.

Recommendation 3 - Developer contributions and external funding (enhancements): Most of the demand for cricket arising from the proposed housing development in Tonbridge and Malling to 2041 can be accommodated through enhancements to existing pitches and

facilities. It is recommended that the site-specific action plan in the Tonbridge and Malling PPS be used as the basis for determining facility enhancements that demonstrably relate to the scale and location of specific developments and that an appropriate level of financial contributions be sought under S106 developer contributions and/or through applications for external funding to cover the capital and revenue implications of the enhancements.

6.11.4 Provide

Recommendation 4 - Developer contributions and external funding (new provision): Some of the extra demand for cricket arising from the proposed housing development in Tonbridge and Malling to 2041, may need to be accommodated through the provision of new pitches and facilities. It is recommended that an appropriate level of financial contributions be sought under S106 developer contributions and/or through applications for external funding to provide cricket facilities to meet the future needs identified in the Tonbridge and Malling PPS.

6.12 Action Plan

6.12.1 Introduction

In the context of the high-level recommendations above, the tables below set out the cricket action plan to guide the implementation of the Study. The abbreviations stand for TMBC - Tonbridge and Malling Borough Council, ECB - England and Wales Cricket Board and KC - Kent Cricket. The capital cost estimates are based upon Sport England's *'Facility Costs - Second Quarter of 2023'* (2023).

6.12.2 Key strategic actions

Issues	*Action*	*Lead/ Facilitator*	*Partners*	*Resources*	*Priority*
Securing developer contributions	Ensure that policy provision is made to secure developer contributions towards new and improved cricket facilities.	TMBC	Developers Local clubs	Determined by Sport England's New Development Calculator	High

6.12.3 Site specific actions

Site	*Issues*	*Action*	*Lead*	*Partners*	*Resources*	*Priority*
Addington Village CC	No current issues.	-	-	-	-	-
Bluebell Hill CC	No current issues.	-	-	-	-	-
Ditton Community Centre	Pitch currently unused	Consider reinstating pitch	Ditton PC	-	Additional maintenance	Medium
Fairlawne Park	• Used to over-capacity on a seasonal basis • 'Poor' quality changing	• Investigate non-turf pitch provision. • Improve changing	Plaxtol Cricket Club	ECB	£10,000 for non-turf pitch £300,000 for changing	High

Site	Issues	Action	Lead	Partners	Resources	Priority
Hadlow CC	Used to over-capacity on a seasonal basis	Investigate non-turf pitch provision	Hadlow CC	-	£10,000 for non-turf pitch	High
Holborough Park	Used to over-capacity on a seasonal basis	Investigate non-turf pitch provision	Holborough Anchorians CC	-	£10,000 for non-turf pitch	High
Kings Hill Cricket Club	No current issues.	-	-	-	-	-
Leybourne Cricket Club	No current issues.	-	-	-	-	-
Mereworth Recreation Ground	No current issues.	-	-	-	-	-
Offham Cricket Club	Used to over-capacity on a seasonal basis	Investigate non-turf pitch provision	Leybourne Cricket Club	-	£10,000 for non-turf pitch	High
Old County Ground	Used to over-capacity on a seasonal basis	Investigate non-turf pitch provision	Town Malling Cricket Club	-	£10,000 for non-turf pitch	High
Racecourse Sports Ground	Pitch currently unused	Consider reinstating pitch	TMBC	-	Additional maintenance	Medium
Riding Lane Recreation Ground	'Poor' quality outfield	Improve outfield	Hildenborough Cricket Club	-	Additional maintenance	Medium
Shipbourne Cricket Club	No current issues.	-	-	-	-	-
Stonehouse Field	• Used to over-capacity on a seasonal basis • 'Poor' quality non-turf pitch. • 'Poor' quality changing. • 'Poor' quality practice nets.	• Investigate non-turf pitch provision. • Improve changing. • Provide new nets	Stonehouse Cricket Club	Platt PC ECB	£10,000 for non-turf pitch £300,000 for changing £20,000 for new nets	High
Swanmead Sports Ground	'Poor' quality changing	Improve changing	TMBC	Cowdrey CC ECB	£300,000 for changing	High
The Cricket Meadow	• 'Poor' quality outfield. • 'Poor' quality practice nets.	Provide new nets	Snodland TC	-	Additional maintenance £20,000 for new nets	High
Tonbridge Cricket Club	• Used to over-capacity on a seasonal basis • Lease expiry issues	• Investigate provision of an additional pitch on an adjacent site. • Resolve lease issues with TMBC	Tonbridge Cricket Club	TMBC ECB	£345,000 for a new pitch	High
Tonbridge Farm Recn. Ground	'Poor' quality pitch.	Improve pitch to 'good' quality	TMBC	-	Additional maintenance	Medium

Site	Issues	Action	Lead	Partners	Resources	Priority
Wateringbury Playing Fields	• 'Poor' quality pitch. • 'Poor' quality outfield • 'Poor' quality changing.	• Improve pitch and outfield to 'good' quality • Improve changing.	Wateringbury PC	ECB	Additional maintenance £300,000 for changing	Medium
Wrotham Cricket Ground	No current issues.	-	-	-	-	-

6.12.4 Potential project impact

The cricket projects with the potential to have the greatest impact on identified needs and deficiencies are as follows:

- Tonbridge Cricket Club to provide a new pitch and resolve security of tenure issues at their current site..
- The Old County Ground non-turf pitch to provide extra capacity for Town Malling CC.

7 RUGBY UNION PITCH NEEDS

7.1 Organisational context

- ***Rugby Football Union:*** The RFU is the governing body of the sport and supports the development of the game in Tonbridge and Malling.
- ***RFU-affiliated Rugby Clubs:*** There are two clubs in the borough, which collectively provide five men's teams, four women's team, 18 age grade boy's teams, seven age grade girl's teams and 18 age grade mixed teams.

7.2 Strategic context

7.2.1 National rugby facilities strategy

The RFUs *'England Rugby Strategy'* (2021) contains priorities and objectives of relevance to facilities provision:

Enjoyment: The objective underpinning this priority is to 'enable positive player experiences on and off the field'. Sub-objectives include:

- 'Improve accessibility for women and girls across the game'.
- 'Make the game inclusive and attractive for 14 to 18 year olds'.
- 'Redefine playing opportunities, structures and competitions for current and future players, recognising the strategic importance of the adult male game'.
- 'Develop match officials and coaches in the community game to enhance player enjoyment'.

Flourishing rugby communities: The objective underpinning this priority is to 'support clubs to sustain and grow themselves and to reflects society'. Sub-objectives include:

- 'Provide support to club and constituent body volunteers so they can attract new, diverse volunteers and help clubs to be fit for the future and self-sustaining'.
- 'Provide support to help clubs maximise the benefit from their facilities and assets'.
- 'Help clubs manage their risk and liabilities'.

Diversity and inclusion: The objective underpinning this priority is to 'drive rugby union in England to reflect the diversity of society'. The sub-objective is to 'improve the diversity of all facets of our game and continue to create an inclusive environment for all'.

7.2.2 Neighbouring local authorities

Playing pitch strategies in neighbouring local authority areas identify cross-boundary issues:

Maidstone Borough Council

The *'Maidstone Pitch Strategy'* (2019) identifies that there are two clubs in the borough (Maidstone RFC and Weavering Warriors RFC) and concludes that 'the existing grass pitches are currently used to their sustainable capacity in the peak periods. Pitch drainage and maintenance could be improved to enhance overall weekly capacity, but this would not solve the issue of the deficit in the peak demand period'.

Tunbridge Wells Borough Council

The *'Tunbridge Wells Playing Pitch strategy 2017 - 2033'* (2017) identifies that there is one club in the borough (Tunbridge Wells RFC) and concludes that 'there is a need to address drainage issues on club rugby pitches and a need for clubs to have access to two sports lit pitches for training. Consideration should be given to the development of a World Rugby Regulation 22 Rugby Union-compliant all-weather pitch for Tunbridge Wells RFC. However, this will require an extension of the current lease with Tunbridge Wells Borough Council. The alternative could be for Tunbridge Wells Rugby Club to develop links with Bennett Memorial Diocesan School and/or with Sevenoaks Rugby Club who are currently seeking planning permission for a pitch at Knole Paddock, Sevenoaks'.

Sevenoaks District Council

The *'Sevenoaks Playing Pitch Strategy'* (2018) concludes that there are four clubs in the district (Sevenoaks RFC, New Ash Green RFC, Leigh RFC and Edenbridge RFC) and concludes that 'there are enough secured community accessible facilities to provide adequate supply at present. However, a significant increase in demand would put severe strain on the capacity of the existing provision. The provision of a World Rugby Regulation 22 Rugby Union-compliant all-weather pitch should be encouraged as it appears to be the only feasible method of addressing the shortage of capacity for Sevenoaks and Surrounds'. The project failed to secure planning consent in 2021.

Gravesham Borough Council

The *'Gravesham Playing Pitch Strategy'* (2016) identifies that there are three rugby clubs in the borough (Gravesend RFC, Old Gravesendians RFC and Vigo RFC) and 'there is insufficient capacity to meet current and future demand, primarily at Gravesend RFC. Consider supply of world rugby compliant AGPs in the area to address levels of overplay'.

Medway Council

The *'Medway Playing Pitch Strategy'* (2019) identifies that there are four clubs in the area (Medway RFC, Gillingham Anchorians RFC, Cliffe Crusaders RFC and Lordswood RFC) and concluded that 'secured community provision will not meet future demand. Therefore, options around club expansion and increasing the number of available sites should be explored. For both training and senior match provision, the current level of supply will not be able to accommodate the future level of demand'.

7.3 Rugby demand

7.3.1 Expressed demand

The information on rugby clubs and teams based in Tonbridge and Malling was supplied by the RFU, cross-referenced to a local clubs survey. A questionnaire was circulated to both RFU-affiliated clubs in the borough. Both responded, representing all teams in the borough.

Club	*Home Ground*	*Men's teams*	*Women's teams*	*Age grade boy's teams*	*Age grade girl's teams*	*Age grade mixed teams*
Aylesford Bulls RFC	The Jack Williams Ground	2	3	8	4	6
Tonbridge Juddians RFC	The Slade	3	1	10	3	12
TOTALS	***-***	***5***	***4***	***18***	***7***	***18***

The number of teams by sub-area is as follows:

Sub-area	*Men's teams*	*Women's teams*	*Age grade boy's teams*	*Age grade girl's teams*	*Age grade mixed teams*
Tonbridge and surrounds	3	1	10	3	12
The Mallings and surrounds	2	3	8	4	6
TONBRIDGE & MALLING	***5***	***4***	***18***	***7***	***18***

Aylesford Bulls RFC are planning to introduce walking rugby, touch rugby and visually-impaired rugby teams, alongside community mental health support programmes.

7.3.2 Displaced demand

Displaced demand relates to play by teams from within the study area which takes place outside of the area, or vice versa. The clubs' membership is drawn from the following areas:

Club	*Tonbridge and Malling*	*Elsewhere*
Aylesford Bulls RFC	70%	30%
Tonbridge Juddians RFC	80%	20%

7.3.3 Unmet demand

Unmet demand takes a number of forms:

- Teams may have access to a pitch for matches but nowhere to train or vice versa.
- Some pitches may be unavailable to the community.
- The poor quality and consequent limited capacity of pitches in the area and/or a lack of provision and ancillary facilities which meet a certain standard of play/league requirement.

There is some evidence of unmet demand at present.

- Aylesford Bulls RFC has poor quality pitches and inadequate changing facilities.

- Tonbridge Juddians RFC has poor quality grass pitches and inadequate changing facilities at The Slade.
- The changing facilities at Vizards Sports Ground are very poor, with no provision for women's changing and some safeguarding issues.

7.3.4 Latent demand

Consultation with local clubs indicated that a total of eight additional teams of all age groups could be accommodated in Tonbridge and Malling if the quality and quantity of pitch provision was improved, a 15.4% increase on the current team numbers.

Club	Men's teams	Women's teams	Age grade boy's teams	Age grade girl's teams	Age grade mixed teams
Aylesford Bulls RFC	1	1	2	0	0
Tonbridge Juddians RFC	1	0	0	3	0
TOTALS	***2***	***1***	***2***	***3***	***0***

7.4 Rugby pitch supply

7.4.1 Quantity

This section summarises the detail of rugby pitch supply in Tonbridge and Malling. The pitches included in the analysis are defined as natural turf areas permanently laid out with regulation markings. The categories assessed are as follows:

- ***Available for community use and used:*** These are as follows.

Site	Address	All-weather pitch*	Sports lit pitches	Non-sports lit pitches
The Jack Williams Ground	Hall Road, Aylesford ME20 7DS	-	2	1
The Slade	The Slade, Tonbridge TN9 1HR	-	1	2**
Vizards Sports Ground	Lower Haysden Lane, Tonbridge TN9 2PL	1*	-	-
TOTALS	***-***	***1****	***3***	***3***

* World Rugby Regulation 22-compliant sports lit artificial grass pitch.
** Also 14 age grade pitches.

- ***Available for community use and not used:*** There are no rugby pitches available for community use that are not used.
- ***Not available for community use:*** These are as follows. All are non-sports lit:

Site	Address	Pitches
Homesdale School	Malling Road, Snodland ME6 5HS	1
Hugh Christie College	White Cottage Road, Tonbridge TN10 4PU	1
Leigh Academy	Brook Street, Tonbridge TN9 2PH	1
Judd School	Brook Street, Tonbridge TN9 2PN	7
Sackville School	Tonbridge Road, Hildenborough TN11 9HN	1
Tonbridge School	London Road, Tonbridge TN10 3AD	12
Wrotham School	Borough Green Road, Wrotham TN15 7RD	1
TOTALS	***-***	***24***

- ***Not available as disused:*** There are no rugby pitches that are available for community use that are disused.
- ***Provision by sub-area:*** Pitches with community use and used by sub-area are as follows:

Sub-area	*Population*	*No. Pitches*	*Pitches per capita*
Tonbridge and surrounds	56,018	4	1: 14,005
Mallings and surrounds	76,182	3	1: 25,394
TONBRIDGE AND MALLING	***132,200***	***7***	***1: 18,886***

7.4.2 Quality

The qualitative analysis involved a visit to all rugby pitches in Tonbridge and Malling with community use and used during the playing season, to undertake the sport-specific non-technical visual inspections produced by the RFU for Sport England's *'Playing Pitch Strategy Guidance'* (2013). The assessment generated 'scores' for each pitch by evaluating the condition of:

- ***Pitch drainage:*** Inadequately naturally drained (scores D0), adequately naturally drained (scores D1) pipe drained (scores (D2) and pipe and slit drained pitches (scores D3).
- ***Grounds maintenance:*** Frequency of aeration, sand-dressing, fertilising, weed killing and chain harrowing. This generates scores of 'Poor' (M0), 'Adequate' (M1) and 'Good' (M2).

The scores for each pitch in Tonbridge and Malling are as follows. 'Good' ratings are highlighted in green, 'standard' in yellow and 'poor' in red. Sports lit pitches are asterisked:

Site	*Maintenance*	*Drainage*
The Jack Williams Ground pitch one*	D0	M1
The Jack Williams Ground pitch two*	D0	M0
The Jack Williams Ground pitch three	D1	M0
The Slade pitch one*	D0	M1
The Slade pitch two	D0	M0
The Slade pitch three	D1	M0

The all-weather pitch at Vizards Sports Ground is rated as 'good' quality.

7.4.3 Grass pitch carrying capacity

The carrying capacity of grass pitches is related to their quality and is expressed as the number of 'match equivalent sessions' that can be accommodated each week. The *'Playing Pitch Strategy Guidance'* indicates the following weekly carrying capacities for rugby union pitches:

Drainage	*Maintenance*		
	Poor	*Adequate*	*Good*
Natural inadequate	0.5	1.0	2.0
Natural adequate	1.5	2.0	3.0
Pipe drained	1.75	2.5	3.25
Pipe and slit drained	2.0	3.0	3.5

In addition to the carrying capacity of the adult pitches, mini-rugby pitches accommodate the equivalent of 0.25 match equivalent sessions. The 14 pitches at The Slade therefore contribute a collective total of 3.5 weekly match equivalent sessions at the site. The weekly collective carrying capacity of the rugby pitch sites with community use and used in Tonbridge and Malling, expressed as 'match equivalents' is therefore as follows:

Site	*Midweek capacity*	*Weekend capacity*	*Total capacity*
The Jack Williams Ground	1.0	3.0	4.0
The Slade	1.0	2.0	3.0
Vizards Sports Ground	10.0	8.0	18.0

7.4.4 Changing quality

The quality of the changing facilities at each of the rugby pitch sites with community use and used in Tonbridge and Malling is as follows:

Site	*Rating*
The Jack Williams Ground	Standard
The Slade	Standard
Vizards Sports Ground	Poor

7.4.5 Pitch maintenance

The Aylesford Bulls RFC pitches at the Jack Williams Ground are maintained by contractors employed by the Club. The pitches at The Slade are maintained by Tonbridge and Malling Borough Council.

7.4.6 Ownership, management and security of access

The ownership, management and security of community access of rugby pitch sites is detailed below. Security of access refers to the extent to which community use of the site is protected (through public ownership, planning policy ownership covenants etc.), rather than the security of tenure of specific club users.

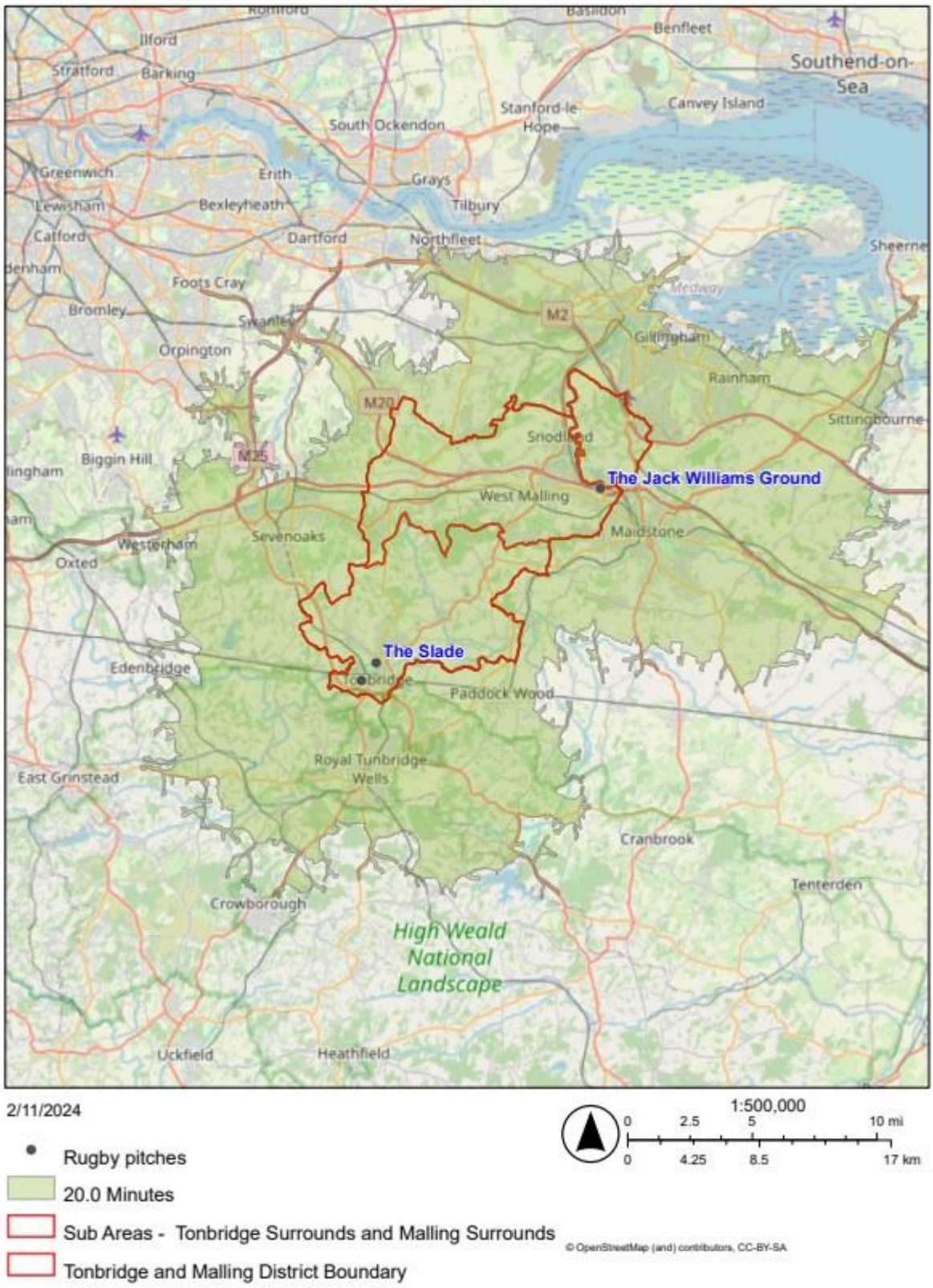
Site	*Ownership*	*Management*	*Access*
The Jack Williams Ground	Aylesford Parish Council	Aylesford Bulls RFC	Secured
The Slade	Tonbridge and Malling BC	Tonbridge and Malling BC	Secured
Vizards Sports Ground	Judd School	Judd School	Secured*

* Tonbridge Juddians RFC has a five -year agreement with Judd School for the use of the pitch.

7.4.7 Geographical distribution

The geographical distribution of rugby pitches in Tonbridge and Malling has been assessed by identifying catchments to illustrate local level accessibility. This is based on the results of the clubs' survey, which identifies 20-minutes travel time as the typical maximum. Based upon this, the map overleaf shows that the entire local population is within the catchment of at least one pitch.

Tonbridge and Malling - Rugby Pitches 20 minutes drive



7.5 The views of local stakeholders

7.5.1 The Rugby Football Union

Consultation with the RFU highlighted that:

- There are two clubs in the borough, Tonbridge Juddians and Aylesford Bulls. The latter has a strong women and girl's section.
- It will be important to disaggregate midweek training demand from weekend match play, to identify capacity pinch points.
- A Grounds Maintenance Association pitch advisor will assess both sites to provide a more detailed appraisal than the standard non-technical visual assessment.
- Sevenoaks has a strong club very close to the borough boundary and is likely to import some demand from Tonbridge and Malling - this should be explored.

7.5.2 Aylesford Bulls RFC

The key comments from the club in response to a questionnaire circulated by the RFU on behalf of the project team were as follows:

- 'We are planning to introduce walking rugby, touch rugby and visually impaired rugby teams'.
- 'Our facilities development aspirations include floodlighting for Pitch 3 and clubhouse refurbishment to provide an extension of player and membership facilities including a gym and meeting and social space of other sports using the site and the local community'.
- 'In addition to our match pitches, we have use of council playing fields and a small training paddock'.
- 'Our pitches suffer from water pooling on pitches 1 and 2, poor grass quality on pitch 2 and poor aeration'.
- 'Our clubhouse and changing are around 25 years old and in need of refurbishment and update for compliance. There are damp issues in the showers area due lack of ventilation'.
- 'We are seeking to extend and re-develop our clubhouse to provide a community hub that caters for a range of sports in addition to rugby (initially netball, archery and petanque) and can expand our existing programme of sports and mental health support'.

7.5.3 Tonbridge Juddians RFC

The key comments from the club in response to a questionnaire circulated by the RFU on behalf of the project team were as follows:

- 'Our current facilities are now 20 years old. Improved facilities are required to including a larger social area, additional changing rooms, fitness and physio provision'.
- 'Most training takes place on the rugby-compliant sports lit all-weather pitch at Vizards Sports Ground (courtesy of Judd School)'.
- 'Our pitches are routinely affected by flooding, sometimes for weeks at a time'.

7.6 The implications for rugby in Tonbridge and Malling

Analysis of local supply of rugby union pitches in Tonbridge and Malling indicates the following:

- ***Local clubs:*** There are two local clubs serving Tonbridge and Malling, both of which provide male and female teams across all age groups.
- ***Provision in neighbouring areas:*** There is an assessed deficit in rugby pitch capacity in all neighbouring areas, so there is no capacity to accommodate any exported demand from Tonbridge and Malling.
- ***Pitch supply:*** The grass pitches at both rugby club sites suffer from drainage issues and are not well-maintained, thereby limiting carrying capacity. This is mitigated in part in Tonbridge with the provision of the World Rugby Regulation 22 Rugby Union-compliant all-weather pitch at Vizards Sports Ground, although access to this is unsecured.
- ***Changing facilities:*** The changing facilities at both rugby club sites do not comply with current requirements and therefore require upgrading.
- ***Security of access:*** All all-weather pitch at Vizards Sports Ground is owned by Judd School and does not have secured access.

7.7 Assessment of current needs

To assess whether the current supply of pitches is adequate to meet existing demand an understanding of the situation at all sites available to the community needs to be developed. This is achieved by providing a brief overview for each site, which comprises:

- A comparison between the carrying capacity of a site and how much demand currently takes place there. The carrying capacity of a site is defined as the amount of play it can regularly accommodate without adversely affecting its quality and use. Demand is defined in terms of the number of 'match equivalent' sessions at each site.
- An indication of the extent to which pitches are being used during their peak periods.

The site overviews identify the extent to which pitches are:

- ***Being overplayed:*** Where use exceeds the carrying capacity.
- ***Being played to the level the site can sustain:*** Where use matches the carrying capacity.
- ***Potentially able to accommodate some additional play:*** Where use falls below the carrying capacity.

As per RFU guidance, rugby union pitch capacity, demand and the resultant balance are expressed as 'match equivalent sessions' at weekly and peak times. Sports lit pitches are asterisked. Overall demand is based upon adult and youth teams requiring an average of 1.5 match equivalent sessions per week for training and matches and mini teams requiring 0.25 match equivalent sessions per week.

Site	Pitches	Users	Weekly capacity	Weekly demand	Weekly balance	Peak capacity	Peak demand	Peak balance
Jack Williams Memorial Ground	1*	Aylesford Bulls RFC	1.0	5.0	-4.0	1.0	1.0	Balanced
	2*	Aylesford Bulls RFC	1.5	6.0	-4.5	1.0	1.0	Balanced
	3	Aylesford Bulls RFC	0.5	1.0	-0.5	1.0	1.0	Balanced
SITE TOTALS	***3***	***-***	***3.0***	***12.0***	***-9.0***	***3.0***	***3.0***	***Balanced***
The Slade	1*	Tonbridge Juddians RFC	1.0	2.0	-1.0	1.0	1.0	Balanced
	2	Tonbridge Juddians RFC	1.5	2.0	-0.5	1.0	1.0	Balanced
	3	Tonbridge Juddians RFC	0.5	1.0	-0.5	1.0	1.0	Balanced

Site	Pitches	Users	Weekly capacity	Weekly demand	Weekly balance	Peak capacity	Peak demand	Peak balance
SITE TOTALS	***3***	***-***	***3.0***	***5.0***	***-2.0***	***3.0***	***3.0***	***Balanced***
Vizards Sports Ground	1*	Tonbridge Juddians RFC	18.0	11.0	+7.0	18.0	11.0	+7.0
TONBRIDGE & MALLING	***7***	***-***	***24.0***	***28.0***	***-4.0***	***24.0***	***17.0***	***+7.0***

The split between midweek training supply and demand and weekend match supply and demand on match pitches is tabulated below, to highlight the main capacity pinch points.

Site	Pitches	Midweek training capacity	Midweek training demand	Midweek training balance	Weekend match capacity	Weekend match demand	Weekend match balance
Jack Williams Memorial Ground	1*	1.0**	4.0	-3.0	1.0	1.0	Balanced
	2*	1.0	3.0	-2.0	1.0	1.0	Balanced
	3	0.0	0.0	Balanced	1.0	1.0	Balanced
SITE TOTALS	***3***	***2.0***	***7.0***	***-5.0***	***3.0***	***3.0***	***Balanced***
The Slade	1*	0.0	0.0	Balanced	1.0	1.0	Balanced
	2	0.0	0.0	Balanced	1.0	1.0	Balanced
	3	0.0	0.0	Balanced	1.0	1.0	Balanced
SITE TOTALS	***3***	***0.0***	***0.0***	***Balanced***	***3.0***	***3.0***	***Balanced***
Vizards Sports Ground	1*	18.0	11.0	+7.0	10.0	0.0	+10.0
TONBRIDGE & MALLING	***7***	***19.0***	***18.0***	***+1.0***	***16.0***	***6.0***	***+10.0***

** Including separate sports lit training area

The key findings are that:

- There is sufficient capacity to meet current match needs.
- Aylesford Bulls RFC has a shortfall for midweek training, that is mitigated through the use of an additional training paddock on site and grassed areas on the adjacent Aylesford Recreation Ground.
- Tonbridge Juddians RFC meets most of its midweek training needs at the sports lit artificial grass pitch at Vizards Sports Ground.

7.8 Assessment of future needs

7.8.1 Population growth

Two scenarios are considered:

- The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).
- Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 or 27.7%.

7.8.2 Potential changes in demand

Consultation with local clubs indicated that a total of eight additional teams of all age groups could be accommodated in Tonbridge and Malling if the quality and quantity of pitch provision was improved, a 15.4% increase on the current team numbers.

7.8.3 Site-specific pressures

There is a significant shortfall in sports lit pitch capacity for midweek training at Aylesford Bulls RFC.

7.8.4 Potential changes in supply

One further issue that will need to be considered in the medium-term is that the European Union has voted to ban the sale of intentionally added microplastics in artificial pitches, including polymeric infill materials like rubber crumb. This ban came into force on October 17th 2023, with an eight-year transition period. The ban does not prevent the continued use of existing rubber crumb infill, nor does it prevent the construction of new pitches with rubber crumb infill before 2031. Following the UK's exit from the EU, the regulatory framework for these matters now sits at a UK level. The Department for Environment, Food & Rural Affairs (DEFRA) recently commissioned an evidence project to review emissions of intentionally added microplastics in Great Britain, including rubber infill. The project is expected to report in spring 2025 and will inform any future regulatory actions in Great Britain. The outcome nay affect '3G' pitch provision in the future, so once the implications become clearer, the issue should be revisited as part of the 'Stage E' review of this PPS.

In the meantime, consideration should be given to retrofitting rubber crumb containment measures at '3G' pitch sites like Vizards Sports Ground. These include:

- Fitting containment barriers on a pitch's perimeter fencing.
- Installing decontamination grates and boot cleaning brushes at all player and vehicle entrance gates.
- Ensuring all stormwater drains around a pitch have suitable microfilters to capture any infill being carried by surface run-off.

7.8.5 Existing spare capacity

The only spare capacity at present is at the artificial grass pitch at Vizards Sports Ground, which is used by Tonbridge Juddians RFC for training purposes, although the access is unsecured.

7.8.6 Future rugby pitch needs

Future rugby pitch needs are modelled below using 'Team Generation Rates' (TGRs), which identify how many people in a specified age group in the borough are required to generate one team. These are then applied to projected changes in population to identify the likely number of teams in the future.

- ***ONS projections:*** The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).

Team type	Age range	Current population	Current teams	Unmet demand	TGR	Population 2041	Teams 2041	Extra teams
Adult males	19-45	20,291	5	2	1: 2,899	21,235	7	0
Adult females	19-45	22,909	4	1	1: 4,582	24,105	1	0
Age grade boys	13-18	5,546	18	2	1: 277	5,671	21	+1
Age grade girls	13-18	4,968	7	3	1: 497	5,100	10	0
Age grade mixed	7-12	11,968	18	0	1: 665	10,771	16	-2

- ***Housing projections:*** Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). At an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 or 27.7%.

Team type	Age range	Current population	Current teams	Unmet demand	TGR	Population 2041	Teams 2041	Extra teams
Adult males	19-45	20,291	5	2	1: 2,899	25,918	9	+2
Adult females	19-45	22,909	4	1	1: 4,582	29,263	6	+1
Age grade boys	13-18	5,546	18	2	1: 277	7,084	26	+6
Age grade girls	13-18	4,968	7	3	1: 497	6,346	13	+3
Age grade mixed	7-12	11,968	18	0	1: 665	15,287	23	+5

7.9 Key findings and issues

7.9.1 What are the main characteristics of current supply and demand?

- ***Local clubs:*** There are two local clubs serving Tonbridge and Malling, both of which provide male and female teams across all age groups.
- ***Provision in neighbouring areas:*** There is an assessed deficit in rugby pitch capacity in all neighbouring areas, so there is no capacity to accommodate any exported demand from Tonbridge and Malling.
- ***Pitch supply:*** The grass pitches at both rugby club sites suffer from drainage issues and are not well-maintained, thereby limiting carrying capacity. This is mitigated in part in Tonbridge with the provision of the World Rugby Regulation 22 Rugby Union-compliant all-weather pitch at Vizards Sports Ground, although access to this is unsecured.
- ***Changing facilities:*** The changing facilities at both rugby club sites do not comply with current requirements and therefore require upgrading.
- ***Security of access:*** All all-weather pitch at Vizards Sports Ground is owned by Judd School and does not have secured access.

7.9.2 Is there enough accessible and secured community use to meet current demand? ***NO*** - There is a midweek deficit at three sites site

Aylesford Bulls has a midweek training shortfall of 7.0 match equivalent sessions and Tonbridge Juddians RFC meets its midweek training needs at an all-weather pitch with unsecured community access.

7.9.3 Is the accessible provision of suitable quality and appropriately maintained? ***NO*** - Many pitches in the borough are affected by drainage issues

Improvements in the drainage and maintenance of the grass pitches at Aylesford Bulls RFC could potentially increase their capacity by 6.5 match equivalent sessions per week, from the current 4.0 match equivalent sessions. Improvements in drainage and maintenance at

Tonbridge Juddians RFC could potentially increase their capacity to 10.5 match equivalent sessions per week, from the current 3.0 match equivalent sessions. Capacity could also be increased in other ways, such as an Artificial Grass Pitch or hybrid pitch improvements.

7.9.4 What are the main characteristics of future supply and demand?

- ***Population growth:*** Two scenarios are considered:
  - The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).
  - Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 or 27.7%.

- ***Changes in demand:*** Projecting future need based on current demand patterns (including identified unmet demand) is a reasonable basis for forecasting.
- ***Changes in supply:*** There are no known proposed changes in supply.
- ***Existing spare capacity:*** There is no peak time spare capacity as present.
- ***Future needs:*** Based on the ONS-based projected population growth scenario, there will be a need for an additional 1.5 weekly match equivalent sessions by 2041. Based on the housing growth scenario, there will be a need for an additional 19.25 weekly match equivalent sessions by 2041. The options for achieving this are considered below:

7.9.5 Is there enough accessible and secured provision to meet future demand? ***NO***

There is a significant shortfall in capacity for midweek training in the borough, with the collective supply-demand balance showing a deficit of 4.0 match equivalent sessions. Additional capacity could be created in three ways:

- ***Pitch quality improvements:*** Improvements in drainage and maintenance to the grass pitches could potentially increase their collective capacity by 15.0 match equivalent sessions per week.
- ***Installation of floodlights:*** The provision of floodlighting to one or more additional pitches at Aylesford Bulls RFC and Tonbridge Juddians RFC would improve the potential for additional midweek use but would only be effective with improvements in pitch drainage and maintenance to expand capacity.
- ***Provision of a World Rugby regulation 22-compliant artificial grass pitch:*** Providing an artificial grass pitch at Aylesford Bulls RFC would increase capacity for midweek training sessions and in the peak match play period for adults (Saturday afternoons) and Juniors/Minis (Saturday and Sunday mornings). Tonbridge Juddians RFC already has access to the all-weather pitch at Vizards Sports Ground, but access to this should be secured through a formal Community Use Agreement.

7.10 Scenario testing

7.10.1 Introduction

Based upon the key findings and issues identified above, some scenarios examining the effect of securing additional pitch capacity have been rehearsed to identify the optimum approach to addressing needs.

7.10.2 Scenario 1: Enhancing grass pitch carrying capacity with maintenance and drainage improvements

- ***Rationale:*** Improving the drainage and maintenance of the pitches at the sites where the drainage and/or maintenance is sub-optimal at present would add the following capacity (in match equivalent sessions) at each site:

Site	*Current capacity*	*Extra capacity*	*Total capacity*
The Jack Williams Ground	4.0	6.5	10.5
The Slade	3.0	6.5	9.5
TOTAL	***7.0***	***13.0***	***20.0***

- ***Advantages:*** The advantages of this scenario are as follows:

  - The additional capacity would theoretically be sufficient to meet all overall projected extra pitch capacity needs to 2041.
  - The extra capacity could be achieved at existing sites without the need for additional land acquisition costs.

- ***Disadvantages:*** The disadvantages of this scenario are that:

  - The main limiting factor for midweek training is the absence of floodlights, with only three fully lit grass pitches in the borough. Whilst pitch quality improvements would add capacity, without additional floodlights there would be limited impact on midweek usage.
  - The cost of grounds maintenance to sustain the enhanced pitch capacity may be problematic.
  - Tonbridge Juddians RFC do most of their midweek training at the sports lit all-weather pitch at Vizards Sports Ground, so improving capacity for training at The Slade would not be worthwhile.

- ***Conclusions:*** There would be merit in exploring the potential for drainage and maintenance improvements at the Jack Williams Ground. However, to maximise the benefits of this, the review will also need to consider the issue of floodlighting to maximise the benefits in the midweek evening period (see below).

7.10.3 Scenario 2: Enhancing grass pitch carrying capacity by providing floodlights

- ***Rationale:*** Whilst improved maintenance and drainage would add overall capacity, to achieve the maximum benefits floodlighting will be required to facilitate use during midweek evenings. The provision of floodlighting to pitch 3 at the Jack Williams Ground would improve the potential for additional midweek use but would only be effective with improvements in pitch drainage and maintenance to expand capacity.
- ***Advantage:*** The advantage of this scenario is that floodlighting an additional pitch will increase its availability on midweek evenings when training sessions take place.
- ***Disadvantages:*** The disadvantages of this scenario are as follows:

  - Its effectiveness is contingent upon the pitch capacity enhancements achievable through the drainage and maintenance improvements, so it needs to be considered in conjunction.
  - On its own, it would have negligible impact upon the existing deficits.

- ***Conclusions:*** The greatest benefits of floodlighting will be where it is combined with an improvement in pitch maintenance or drainage ratings. Floodlighting pitch 3 at the Jack Williams Ground would provide one option for addressing capacity shortfalls.

7.10.4 Scenario 3: Enhancing pitch carrying capacity by providing a rugby-compliant artificial grass pitch

- ***Rationale:*** Providing an artificial grass pitch (or alternative mechanism for enhancing the pitch capacity in addition to drainage e.g. hybrid technology) at the Jack Williams Ground would increase capacity for midweek training sessions and in the peak match play period for adults (Saturday afternoons) and Juniors/Minis (Sunday mornings). As a related benefit, there is significant unmet demand from local football clubs for access to '3G' pitches, so a rugby-compliant artificial grass pitch would also serve wider needs.

- ***Advantages:*** The advantages of this scenario are as follows:

  - The pitch would add 10.0 midweek match equivalent sessions and 4.0 weekend match equivalent sessions at each site (offset by the loss of the grass pitch upon which it would be sited) which would meet all current and future needs.

  - Subject to any spare rugby capacity, the pitch could additionally contribute to meeting identified deficiencies in '3G' Football Turf Pitches in the borough.

- ***Disadvantage:*** The only disadvantage of this scenario is that to achieve maximum peak-time benefits will involve scheduling matches at non-traditional kick-off times which is a relatively new concept for many teams.

- ***Conclusions:*** The feasibility of installing a World Rugby Regulation 22-compliant artificial grass pitch (or other means for enhancing the pitch capacity in addition to drainage e.g. hybrid technology) at the Jack Williams Ground should be investigated further as an alternative to improvements to grass pitch drainage and floodlighting.

7.11 Policy recommendations

7.11.1 Introduction

The recommendations in relation to rugby union are made in the context of the National Planning Policy Framework (NPPF) paragraph 103, which stipulates that existing open space including playing pitches, should not be built upon unless:

- An assessment has taken place which has clearly shown the open space to be surplus to requirements, or;
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality, in a suitable location, or;
- The development is for alternative sport and recreation provision, the needs for which clearly outweighs the loss.

The following recommendations are arranged under 'protect' and 'enhance'.

7.11.2 Protect

Recommendation 1 - Safeguarding existing provision: The Tonbridge and Malling PPS comprises a robust and evidence-based assessment of current and future needs for rugby union in the borough. The PPS has identified a need to increase local rugby pitch capacity and to this extent, it will be important for all current community used rugby pitch sites to be retained and protected. It is therefore recommended that planning policies continue to support the retention of all sites, based upon the evidence in the PPS. If proposals to redevelop rugby pitches do come forward, this will only be permissible they are replaced and meet policy exception E4 of Sport England's Playing Fields Policy. This states that 'the playing field or playing fields which would be lost as a result of the proposed development must be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of development'.

7.11.3 Enhance

Recommendation 2 - Improving existing pitch capacity: Additional pitch capacity would best be developed at existing pitches by improving the quality of pitch drainage and maintenance at the Jack Willams Ground with related floodlighting provision.

Recommendation 3 - Developer contributions and external funding: All the additional demand for rugby arising from housing development in Tonbridge and Malling to 2041, should be accommodated through the recommendations outlined above. It is recommended that the action plan in the Tonbridge and Malling PPS be used as the basis for seeking an appropriate level of financial contributions under S106 developer contributions and/or through applications for external funding to cover the capital and revenue implications of the enhancements, in conjunction with any other external sources of funding that might be available.

7.12 Action Plan

7.12.1 Introduction

In the context of the recommendations above, the rugby union action plan below will guide the implementation of the Study. The abbreviations stand for TMBC - Tonbridge and Malling Borough Council and RFU - Rugby Football Union. The capital cost estimates are based upon Sport England's *'Facility Costs - Second Quarter of 2023'* (2023).

7.12.2 Key strategic actions

Issues	*Action*	*Lead/ Facilitator*	*Partners*	*Resources*	*Priority*
Securing developer contributions	Ensure that policy provision is made to secure developer contributions towards new and improved rugby facilities.	TMBC	Developers	Determined by Sport England's New Development Calculator	High
Sports lighting energy efficiency	Replace old sports lighting with LED heads and upgrade switching gear	Site owners	-	£30,000 per site	Medium
'3G' pitch rubber crumb containment	Retrofit containment measures	Judd School	-	£20,000	Medium

7.12.3 Site specific actions

Site	Issues	Action	Lead/ Facilitator	Partners	Resources	Priority
The Jack Williams Ground	• Midweek capacity shortfall. • Inadequate clubhouse facilities	• Improve drainage and maintenance. • Explore the feasibility of providing floodlighting to pitch 3. • Extend and refurbish the clubhouse.	Aylesford Bulls RFC	RFU TMBC	£100,000 for drainage/ floodlights £1,000,000 for clubhouse	High
The Slade	Some clubhouse enhancements required	Provide a larger social area, additional changing rooms, fitness and physio provision.	Tonbridge Juddians RFC	RFU	£300,000	Medium
Vizards Sports Ground	Poor quality changing facilities	Provide enhanced changing facilities with secured community use.	Judd School	RFU TMBC	£785,000	High

7.12.4 Potential project impact

The rugby projects with the potential to have the greatest impact on identified needs and deficiencies are as follows:

- Pitch improvements and clubhouse extension at the Jack Williams Ground.
- Improved changing facilities at Vizards Sports Ground.

8 HOCKEY PITCH NEEDS

8.1 Organisational context

- ***England Hockey:*** England Hockey is the governing body of the sport and supports the development of the game in Tonbridge and Malling.

- ***England Hockey-affiliated club:*** There are two affiliated clubs using pitches in Tonbridge and Malling, one of whom draws its membership from within the borough and one club from Tunbridge Wells. They collectively provide ten men's teams, eight women's teams, nine junior boy's teams and nine junior girl's teams.

8.2 Strategic context

8.2.1 National hockey strategy

England Hockey's strategic plan 2017 - 2027 *'A Nation Where Hockey Matters'* (2017) contains the following priorities of relevance to Tonbridge and Malling:

The vision is for England to be a 'Nation Where Hockey Matters'.

Adults: The number playing regularly in the club network will be increased by:
- Working with universities, schools and colleges to deliver quality playing experiences and clear pathways to club hockey.
- Working with regional and local leagues and affiliated clubs, to deliver the highest quality playing experience and appropriate competition frameworks.
- Developing more opportunities for over 40s to play hockey.
- Delivering a quality programme of competitions that meet the needs of players and clubs.

Young people: The number playing hockey in schools and clubs will be increased by:
- Developing more relationships between clubs and primary and secondary schools.
- Working with clubs to increase the number of junior hockey sessions being provided.
- Delivering a quality programme of competitions that meet the needs of players, schools and clubs.
- Developing an ability-based pathway for children aged 5-12 for adoption in clubs, schools and youth organisations.

Informal hockey: The numbers of people playing informal hockey will be increased by:
- Setting up opportunities to play Quicksticks and Hockey Heroes in community sites.
- Increasing the opportunities to play Rush Hockey at schools, colleges, universities, clubs and community sites.
- Increasing the opportunity for women to take part in Back to Hockey sessions at clubs and community sites.

8.2.2 Hockey facilities strategy

England Hockey's *'Facilities Strategy'* (2016) contains the following key elements:

Vision: For every hockey club in England to have appropriate and sustainable facilities that provide excellent experiences for players.

Mission: 'More, Better, Happier Players with access to appropriate and sustainable facilities'. The 3 main objectives of the facilities strategy are:

- ***Protect - To conserve the existing hockey provision:*** There are currently over 800 pitches that are used by hockey clubs (club, school, universities.) The current provision must be retained where appropriate, to ensure that hockey is maintained across the country.

- ***Improve - To improve the existing facilities stock (physically and administratively):*** The current facilities stock is ageing and there needs to be strategic investment into refurbishing the pitches and ancillary facilities. There needs to more support for clubs to obtain better agreements with facilities providers and education around owning an asset.

- ***Develop - To strategically build new hockey facilities where there is an identified need and ability to deliver and maintain:*** The research has identified key areas across the country where there is a lack of suitable Hockey provision and there is a need for additional pitches. There is an identified demand for multi pitches in the right places to consolidate hockey and allow clubs to have all of their provision catered for at one site.

England Hockey has identified key areas across the country where there is a lack of suitable hockey provision and there is a need for additional pitches, suitable for hockey. There is an identified demand for multi pitches in the right places to consolidate hockey and allow clubs to have all of their provision catered for at one site.

8.2.3 Neighbouring local authorities

Playing pitch strategies in neighbouring districts identify cross-boundary issues:

Maidstone Borough Council

The *'Maidstone Pitch Strategy'* (2019) identifies that there are three England Hockey-affiliated clubs in the borough, Maidstone HC, Sutton Valance HC and Marden Russets HC and concludes that 'the South Park pitch is overused in the peak period (particularly at weekends), which is managed by scheduling activity in timeslots immediately adjacent to the peak period. There is some spare capacity at the Marden and Sutton Valance pitches' All pitches require resurfacing to sustain hockey use, but subject to this, there is sufficient spare capacity to accommodate future needs.

Tunbridge Wells Borough Council

The *'Tunbridge Wells Playing Pitch strategy 2017 - 2033'* (2017) identifies that there is one club in the borough (Tunbridge Wells HC). Tunbridge Wells HC plays its 'home' matches at Tonbridge School but has a clubhouse at the Nevill Ground and undertakes some training at the Hawkenbury and Kent College, Pembury pitches. The Club has aspirations for an all-weather pitch at the Nevill Ground.

Sevenoaks District Council

The *'Sevenoaks Playing Pitch Strategy'* (2018) concludes that there are two hockey clubs in the district (Sevenoaks HC and Edenbridge HC) and concludes that 'whilst there is an over-supply of hockey provision in Sevenoaks District, much of this capacity supply is provided by Edenbridge Leisure Centre. Following consultation with England Hockey and the club users it is evident that there are significant challenges with securing consistent and fit-for-purpose hockey provision across the sub-area of Sevenoaks and Surrounds. There are not sufficient secured and available sites for community use hockey, with clubs being required to use a combination of sites to meet the demands of club members, some of which are unsecured for community use'.

Gravesham Borough Council

The *'Gravesham Playing Pitch Strategy'* (2016) identifies that there are three hockey clubs in the borough (Gravesend and Wellcome Men's HC, Gravesend Ladies HC and Meopham and 'there is one full-sized artificial grass pitch in the borough Although there is sufficient provision to meet current demand, there is no capacity for growth at peak times. The quality of existing provision is the key priority as it is likely to act as a barrier to increasing participation and even to sustainability of hockey in Gravesham'.

Medway Council

The *'Medway Playing Pitch Strategy'* (2019) identifies that there are three clubs in the area (Holcombe HC, Gillingham Anchorians HC and Old Williamsonians HC) and concluded that 'the projected increase in demand can be satisfied at the existing club sites, however consultation has indicated that Holcombe Hockey Club struggles at peak time, as the club has some spare capacity, however currently struggles to meet demand at peak times'.

8.3 Hockey demand

8.3.1 Expressed demand

The following clubs play in the borough. External teams and pitches used are shown in italics:

Club	*Home Grounds*	*Men's teams*	*Women's teams*	*Boy's teams*	*Girl's teams*
K-Sports Hockey Club	K-Sports, Cobdown*	4	3	0	0
Tunbridge Wells Hockey Club	Tonbridge School *Kent College, Pembury* *Hawkenbury*	*6*	*5*	*9*	*9*
TOTALS	***-***	***10***	***8***	***9***	***9***

* the Club previously utilised the K-Sports site prior to the sale and their use agreement was ended by the previous owner. The club is currently seeking alternative pitch provision.

8.3.2 Displaced demand

Displaced demand relates to play by teams from within the study area which takes place outside of the area, or vice versa. Eleven teams from Tunbridge Wells HC play matches and train on the pitches at Tonbridge School. Other clubs based at facilities close to Tonbridge and Malling are as follows:

Club	Home site	Distance from Tonbridge and Malling
Holcombe HC	Curtis Way, Rochester ME1 2TQ	0.5 miles
Maidstone HC	South Park, Armstrong Road, Maidstone ME15 6AZ	2 miles
Marden Russets HC	Maidstone Road, Marden TN12 9AG	5 miles
Sevenoaks HC	Holly Bush Lane, Sevenoaks TN13 3UX	2 miles
Gillingham Anchorians HC	Darland Avenue, Gillingham ME7 3AN	3 miles
Old Williamsonians HC	Sir Joseph Williamson's Mathematical School, Maidstone Road, Rochester ME1 3EL	1 mile

8.3.3 Unmet demand

Unmet demand takes a number of forms:

- Teams may have access to a pitch for matches but nowhere to train or vice versa.
- Some pitches may be unavailable to the community.
- The poor quality and consequent limited capacity of pitches in the area and/or a lack of provision and ancillary facilities which meet a certain standard of play/league requirement.

Consultation with K-Sports HC indicated that there is significant unmet demand at present.

- The club has unmet demand for an additional four hours per week of pitch time for matches.
- The club has unmet demand for an additional pitch time for midweek training, which is currently used for football training.
- Club is currently seeking alternative pitch provision following the sale of the K Sports site.

8.3.4 Latent demand

Whereas unmet demand is known to currently exist latent demand is demand that evidence suggests may be generated from the current population if they had access to more or better provision. K-Sport HC has identified latent demand as part of its five-year development plan.

8.4 Hockey pitch supply in Tonbridge and Malling

8.4.1 Quantity

This section summarises the detail of the supply of artificial turf pitches suitable for hockey (sand-dressed and sand-filled) in Tonbridge and Malling.

- Water-based pitches are the preferred surface for elite-level hockey. The sports turf uses a denser pile than other surface types which, combined with the water layer, provides the truest ball roll of any artificial turf system.
- Sand-dressed artificial turf is a higher specification surface designed specifically for fast-paced hockey.
- With sand-filled pitches, the playing surface is only partially filled (usually about two-thirds of the pile height) so the game is played on the sports carpet, not the sand infill.

- Both types of sand-based pitches can also be used for football, but the rubber crumb-filled, long-pile surface of '3G' football turf pitches and/or World Rugby Regulation 22-

compliant pitches are not suitable of hockey use. The peak demand period for hockey is Saturday for match play and midweek 6.00pm to 10.00pm for training.

- ***Full-sized pitches with community use and used:***

Site	Address	Dimensions	Surface	Sports lit	Built	Resurfaced
Tonbridge School	London Road, Tonbridge TN10 3AD	97m x 62m 97m x 60m 92m x 55m	Water-based Sand-filled Sand-filled	Yes Yes No	2008 2004 1990	2018 2022 -

- ***Pitches not available for community use:*** There are two pitches in this category.

Site	Address	Dimensions	Surface	Sports lit	Built	Resurfaced
K-Sports*	Station Road, Aylesford ME20 6AU	100m x 63m	Sand-dressed	Yes	2017	-
Tonbridge Grammar School	Deakin Leas, Tonbridge TN9 2JR	97m x 61m	Sand-filled	Yes	2017	-

* the Club is currently seeking alternative pitch provision. The implications of this will be considered as part of the first stage E strategy review.

- ***Provision by sub-area:*** Pitches with community use and used by sub-area are as follows:

Sub-area	Population	No. Pitches	Pitches per capita
Tonbridge and surrounds	56,018	3	1: 18,673
Mallings and surrounds	76,182	1	1: 76,182
TONBRIDGE &MALLING	***132,200***	***4***	***1: 33,050***

8.4.2 Use of hockey pitches for football

The following pitches also accommodate football usage:

Site	Hockey use	Hockey use (%)	Football use	Football use (%)	Unused	Unused (%)
K-Sports*	16 hours	40%	24 hours	60%	0 hours	0%
Tonbridge School	3 hours	7.5%	27 hours	67.5%	10 hours	25%

* the Club is currently seeking alternative pitch provision. The implications of this will be considered as part of the first stage E strategy review.

The split between midweek and weekend use at each pitch is as follows:

Site	Midweek used hours	% capacity	Saturday used hours	% capacity	Sunday used hours	% capacity
K-Sports (previously)	25	100%	10	100.0%	5	83.3%
Tonbridge School water-based 1	18	90%	6	100.0%	4	66.7%
Tonbridge School sand-filled (Rowan's Astro)	25	100%	6	100.0%	4	66.7%
Tonbridge School sand-filled (Thomas' Astro)	0	0.0%	0	0.0%	3	50.0%
TOTALS	***68***	***97.1%***	***22***	***100.0%***	***16***	***66.7%***

8.4.3 Quality

The qualitative analysis of pitches and related facilities in Tonbridge and Malling involved a visit to all hockey pitches, to undertake the sport-specific non-technical visual inspections produced by England Hockey for Sport England's *'Playing Pitch Strategy Guidance'* (2013). The assessment generates an overall 'score' for each pitch by evaluating the condition of the playing surface, fencing, floodlighting, disability access and changing provision. The scores for each artificial grass pitch for hockey with community use and used are as follows:

Site	Pitch	Changing
K-Sports*	Good	Standard
Tonbridge School water-based	Good	Good
Tonbridge School and-filled 1	Good	Good
Tonbridge School sand-filled 2	Standard	Good

* the Club is currently seeking alternative pitch provision following the cessation of their arrangements at K-Sports.

8.4.4 Pitch maintenance

All hockey pitch maintenance in the borough is the responsibility of each pitch owner, although there is no record of the extent to which this complies in each case with best practice.

8.4.5 Ownership, management and security of access

The ownership, management and security of community access of hockey pitch sites is detailed below. Security of access refers to the extent to which community use is protected.

Site	Ownership	Management	Security of access
Tonbridge School	Tonbridge School	Tonbridge School	Secured

8.4.6 Geographical distribution

The geographical distribution of artificial grass pitches in Tonbridge and Malling has been assessed by identifying catchments to illustrate local level accessibility. This is based on the results of the clubs' survey, which identifies 20-minutes travel time as the typical maximum. Based upon this, the map overleaf shows that the entire local population is within the catchment of at least one pitch.

Tonbridge and Malling - artificial grass pitches for hockey



8.5 The views of stakeholders on pitch supply and demand

England Hockey: Consultation with England Hockey raised the following issues:

- The hockey position in quite complex in Tonbridge and Malling because whilst there is only one club that draws the majority of its membership from the borough, Tunbridge Wells HC from a neighbouring district is partly based at the Tonbridge School pitches

- Furthermore, several other clubs are based in neighbouring areas but close to the border with Tonbridge and Malling so the dynamics of imported and exported demand need to be considered carefully.
- The loss of access to the pitch at the former K-Sports site has created severe problems for K-Sports HC. The Club has investigated the possibility of using three pitches outside the borough:

    - Invicta Grammar School for Girls is in Maidstone and has a sports lit small-sided (70m x 45m) sand-filled pitch that is 7.1 miles or 15 minutes drivetime from the K-Sports site. Because of its small size, it is unsuitable for anything other than training.
    - Thomas Aveling School is in Rochester and has a full-sized sand-dressed pitch that is not sports lit and is 7.9 miles or 14 minutes driving time from the K-Sports site. Because of the lack of lighting, it is unusable for training in the winter months and has only limited capacity for weekend matches.
    - Sutton Valence School is in Maidstone borough and has a full-sized sand-dressed sports lit pitch that is 12.7 miles or 23 minutes driving time from the K-Sports site. The pitch has a 'poor' quality surface however, which led to a cessation of use by former hockey club users.

K-Sports Hockey Club:

The key comments from the club in response to a questionnaire circulated by England Hockey on behalf of the project team were made before the loss of access to the K-Sports pitch as follows. The implications of this will be considered as part of the first stage E strategy review.

- 'We have a full 5-year development plan, which is focussing on growing the Club, its members and volunteers, along with the number of teams. Currently we have use of one hockey suitable pitch at K-Sports Cobdown, of which all the league slots on a Saturday are utilised. If our plans continue as forecast for growth, we will need access to a second hockey-suitable astro, in the very local vicinity, to allow games to take place, otherwise our growth will be stunted'.
- 'We have enough players for a fourth ladies team but are currently holding off as we would not have enough pitch slots for a league team. This is causing us to load teams with more players (up to the limit of 16) and is reducing the amount of pitch time/game time players get. This is accepted but is not a long-term sustainable approach'.
- 'An Indoor sports hall, changing blocks and facility and an additional pitch would all bring direct growth both for the Club and the other sports that operate from the site'.
- 'We run a summer league for both Male and Female sides. We also run 'pay-and-play' sessions, along with turn up and try training sessions. In addition to this for adults, we also support the SGO team for running and facilitating events for primary and secondary schools. Our development plan calls out our intention to start 'Back to Hockey' sessions'.
- 'We use the site on the basis of an annual rental agreement We also have a usage agreement in place, along with a licence to occupy, which expires in April 2024. K-Sports have been very good to us and we have a great, committed long-term relationship for the use of the site. We actively work together on development and initiatives to support each other'.
- 'Flooding issues have caused problems on the pitch which are being resolved. This was due to building work on the former papermill site and the culvert water not flowing freely, causing a stream to flood onto the pitch and lift it out of place. Work from the Environment Agency and South-East Water is/has taken place to work to resolve the issues'.

- ‘Apart from the issues post flooding that are being resolved, the site is fantastic. The room for potential is huge and it is a vital sporting facility in the area. As a Club, after being nomadic for many years due to having to play elsewhere because of no suitable astro pitch at the Club, we are thrilled to be back and want to support the venue and area in the provision of hockey to the community’.

- ‘There is a strong bias towards 3G/4G pitches [in Tonbridge and Malling]. These are suitable for football/rugby, but not for hockey, so limited the provision of the sport locally, especially in the Ditton/Larkfield/Aylesford/West Malling area’.

Following the loss of the K-Sports pitch, the club made the following additional comments:

- ‘The K-Sports Cobdown site is to be closed with immediate effect as has been sold in a private transaction. The new owners are not willing or wanting to accept us as users of the site and hire the facilities, which has meant we now have nowhere to play hockey. This could result in us dissolving the Club and it ceasing to exist, removing the Club from the Kent, South-East (Kent Sussex and Surrey) and England Hockey setup. This will impact in the region of nearly 150 active members, plus all the juniors and school programmes we run. The club has been part of the fabric of the hockey community locally and regionally for a long time and we fear this may now be lost’.
- ‘We are keen to explore options for establishing a new permanent venue in the north of the borough, with Kings Hill Sports Park and Aylesford Bulls Rugby Club possible locations’.

8.6 The implications for hockey in Tonbridge and Malling

Analysis of local supply and demand for hockey pitches in Tonbridge and Malling indicates the following:

- ***Local clubs:*** There is one hockey club serving Tonbridge and Malling, but Tunbridge Wells Hockey Club is also based in the borough and six other clubs are based within five miles of the borough boundary.
- ***Imported demand:*** Eleven teams from Tunbridge Wells HC use the pitches at Tonbridge School for matches and training.
- ***Pitch supply:*** There are four artificial grass hockey pitches in Tonbridge and Malling but there is no spare capacity of hockey pitches in the Saturday peak-period. The loss of the K-Sports pitch has created problems for K-Sports HC and there is no spare capacity to accommodate the club at the Tonbridge School Pitches because of existing high demand, part of which is from football.
- ***Facility aspirations:*** K-Sports HC would like to secure a new permanent home in the north of the borough.

8.7 Assessment of current needs

To assess whether the current supply of pitches is adequate to meet existing demand an understanding of the situation at all sites available to the community needs to be developed. This is achieved by providing a brief overview for each site, which comprises:

- A comparison between the carrying capacity of a site and how much demand currently takes place there. The carrying capacity of a site is defined as the amount of play it can regularly accommodate without adversely affecting its quality and use. Demand is defined in terms of the number of ‘match equivalent’ sessions at each site.
- An indication of the extent to which pitches are being used during their peak periods.

The site overviews identify the extent to which pitches are:

- ***Being overplayed:*** Where use exceeds the carrying capacity.
- ***Being played to the level the site can sustain:*** Where use matches the carrying capacity.
- ***Potentially able to accommodate some additional play:*** Where use falls below the carrying capacity.

As per England Hockey guidance, pitch capacity is expressed as weekly peak time hours of availability, demand as actual hours of use and the resultant balance is expressed as hours of availability at peak times. The actual used capacity of artificial turf pitches is based upon their hours of use in the peak period supplied by the pitch operators.

Site	Users	Saturday capacity	Saturday demand	Saturday balance	Sunday capacity	Sunday demand	Sunday balance
K-Sports*	K-Sports HC	6.0	6.0	Balanced	6.0	5.0	+1.0
Tonbridge School water-based 1	*Tunbridge Wells HC* Tonbridge School	4.0	4.0	Balanced	6.0	4.0	+2.0
Tonbridge School Sand-filled 1	*Tunbridge Wells HC* Tonbridge School	4.0	4.0	Balanced	6.0	4.0	+20
Tonbridge School sand-filled 2	Tonbridge School	6.0	6.0	Balanced	6.0	3.0	+3.0
TOTALS	**-**	***20.0***	***20.0***	***Balanced***	***24.0***	***16.0***	***+8.0***

* Prior to the loss of use of the facility.
The split between midweek and weekend use at each pitch is as follows:

Site	Midweek used hours	% capacity	Saturday used hours	% capacity	Sunday used hours	% capacity
K-Sports*	25.0	100%	6.0	100%	5.0	83.3%
Tonbridge School water-based 1	18.0	90%	4.0	100%	4.0	66.7%
Tonbridge School Sand-filled 1	25.0	100%	4.0	100%	4.0	66.7%
Tonbridge School sand-filled 2	0	0.0%	6.0	100%	3.0	50.0%
TOTALS	***68***	***97.1%***	***20.0***	***100%***	***16.0***	***66.7%***

* Prior to the loss of use of the facility.

The assessment shows that:

- There is a no effective spare capacity during the Saturday peak period.
- Midweek used hours average 97.1% utilisation across the three available pitches, including 51 hours of football usage.

8.8 Assessment of future needs

8.8.1 Population growth

Two scenarios are considered:

- The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).

- Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 or 27.7%.

8.8.2 Potential changes in demand

Consultation with K-Sports HC indicated that a total of five additional teams of all age groups could be accommodated in Tonbridge and Malling if the quality and quantity of pitch provision was improved.

8.8.3 Site-specific pressures

There is no spare capacity in the peak period on Saturdays.

8.8.4 Potential changes in supply

The loss of the K-Sports pitch has created an urgent need for a replacement facility in the borough.

8.8.5 Existing spare capacity

There is some midweek spare capacity at Tonbridge School.

8.8.6 Future hockey pitch needs

Future hockey pitch needs are modelled below using 'Team Generation Rates', which identify how many people in a specified age group in the borough are required to generate one team. These are then applied to projected changes in population to identify the likely number of future teams.

- ***ONS projections:*** The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).

Team type	*Age range*	*Current population*	*Current teams*	*Unmet demand*	*TGR*	*Population 2041*	*Teams 2041*	*Extra teams*
Adult male hockey	18-45	21,173	4	0	1: 5,293	22,161	4	0
Adult female hockey	18-45	22,961	3	1	1: 5,740	24,085	4	0
Boys junior hockey	8-17	10,441	0	2	1: 5,205	9,515	2	0
Girls junior hockey	8-17	8,620	0	2	1: 4,310	8,715	2	0

- ***Housing projections:*** Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). At an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 or 27.7%.

Team type	*Age range*	*Current population*	*Current teams*	*Unmet demand*	*TGR*	*Population 2041*	*Teams 2041*	*Extra teams*
Adult male hockey	18-45	21,173	4	0	1: 5,293	27,045	5	+1
Adult female hockey	18-45	22,961	3	1	1: 5,740	29,329	5	+1
Boys junior hockey	8-17	10,441	0	2	1: 5,205	13,337	3	+1
Girls junior hockey	8-17	8,620	0	2	1: 4,310	11,011	3	+1

8.9 Key findings and issues

8.9.1 What are the main characteristics of current supply and demand?

- ***Local clubs:*** There is one hockey club serving Tonbridge and Malling, but Tunbridge Wells Hockey Club is also based in the borough and six other clubs are based within five miles of the borough boundary.
- ***Imported demand:*** Eleven teams from Tunbridge Wells HC use the pitches at Tonbridge School for matches and training.
- ***Pitch supply:*** There are four artificial grass hockey pitches in Tonbridge and Malling but there is no spare capacity of hockey pitches in the Saturday peak-period. The loss of the K-Sports pitch has created problems for K-Sports HC and there is no spare capacity to accommodate the club at the Tonbridge School Pitches because of existing high demand, part of which is from football.
- ***Facility aspirations:*** K-Sports HC would like to secure a new permanent home in the north of the borough.

8.9.2 Is there enough accessible and secured community use to meet current demand? ***NO***

The loss of the K-Sports pitch has created an urgent need for a replacement facility in the borough. The implications of this will be considered as part of the first stage E strategy review.

8.9.3 Is the accessible provision of suitable quality and properly maintained? ***YES***

There are no quality issues with the pitch provision.

8.9.4 What are the main characteristics of future supply and demand?

- ***Population growth:*** Two scenarios are considered:
  - The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).
  - Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 or 27.7%.

- ***Changes in demand:*** Projecting future need based on current demand patterns (including identified unmet demand) is a reasonable basis for forecasting.
- ***Changes in supply:*** The loss of the K-Sports pitch has created an urgent need for a replacement facility in the borough.
- ***Existing spare capacity:*** There is no peak time spare capacity as present.
- ***Future needs:*** Based on the ONS-based projected population growth scenario, there will be no additional team demand by 2041. Based on the housing growth scenario, there will be four additional teams by 2041, collectively requiring a total of 8.0 weekly match equivalent sessions.

8.9.5 Is there enough accessible and secured provision to meet future demand? ***NO***

The loss of the K-Sports pitch has created an urgent need to accommodate existing and projected future demand. Additional capacity could be created in two ways: -

- ***A new pitch:*** Providing a new pitch at a site in the borough.
- ***Diversion of football demand:*** Providing additional '3G' football turf pitch capacity in the borough would divert football demand away from the existing Rowans pitch at Tonbridge School in the midweek training period and would provide sufficient extra capacity to meet the needs of K-Sports HC.

8.10 Scenario testing

8.10.1 Introduction

Based upon the key findings and issues identified above, some scenarios examining the effect of securing additional pitch capacity have been rehearsed to identify the optimum approach to addressing needs.

8.10.2 Scenario 1: Providing a new pitch

- ***Rationale:*** The loss of the K-Sports pitch has created an urgent need for a replacement facility in the borough. Providing a pitch at a new site would rectify this.
- ***Advantage:*** The advantage of this scenario is that a new pitch would create additional capacity to serve unmet needs.
- ***Disadvantages:*** The disadvantages of this scenario are that:
    - Whilst locations at Kings Hill Sports Park and Aylesford Bulls Rugby Club are under discussion, there is no certainty that either site could accommodate an artificial turf pitch for hockey.
    - The capital costs of providing a new pitch are high. Sport England's latest *'Facility Cost Guidance: Third Quarter 2023'* (2023) quotes £950,000 for a new full-sized sand-dressed pitch with floodlights.
- ***Conclusions:*** This would be the best way of meeting hockey needs in the borough, subject to identifying a suitable site (ideally in the north of the borough) and the necessary funding.

8.10.3 Scenario 2: Displacing football use at Tonbridge School to '3G' football turf pitches

- ***Rationale:*** Providing additional '3G' football turf pitch capacity in the borough would divert football demand away from the existing Rowans pitch at Tonbridge School in the midweek training period and would provide sufficient extra capacity to meet the needs of K-Sports HC.
- ***Advantages:*** The advantages of this scenario are as follows:
    - TMBC has already invested funding in re-surfacing the Rowan's pitch at Tonbridge School with a GEN2 surface suitable for Football and Hockey. It is subject to a community use agreement as a result.
    - TMBC is already considering providing an additional '3G' pitch at Tonbridge Farm Sports Ground. Reprogramming football use to specialist '3G' playing surfaces would free up 27 hours per week of pitch capacity at the Rowans for hockey.
- ***Disadvantages:*** The disadvantages of this scenario are as follows:
    - All football use is at midweek evenings, not in the period of peak demand for hockey at the weekends. This means that the capacity in the peak periods would not be increased, although there would be additional time for midweek hockey training.

- The site is in the south of the borough, whereas the main focus of K-Sports HC's activities and membership is in the north of the borough.

- ***Conclusions:*** Displacing football use of artificial grass pitches for hockey to '3G' pitches would have benefits for the players of both sports and give K-Sports Hockey Club an interim base whilst it investigates options for a permanent home.

8.11 Policy recommendations

8.11.1 Introduction

The recommendations in relation to hockey are made in the context of the National Planning Policy Framework (NPPF) paragraph 103, which stipulates that existing open space including playing pitches, should not be built upon unless:

- An assessment has taken place which has clearly shown the open space to be surplus to requirements, or
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality, in a suitable location, or;
- The development is for alternative sport and recreation provision, the needs for which clearly outweighs the loss.

The recommendations are arranged under the main headings of 'protect', 'enhance' and 'provide'.

8.11.2 Protect

Recommendation 1 - Safeguarding existing provision: The Tonbridge and Malling PPS comprises a robust and evidence-based assessment of current and future needs for hockey in the borough. The PPS has identified a need to increase local hockey pitch capacity and to this extent, it will be important for all current community used hockey pitch sites to be retained and protected. It is therefore recommended that planning policies continue to support the retention of all sites, based upon the evidence in the PPS. If proposals to redevelop hockey pitches do come forward, this will only be permissible if they are replaced and meet policy exception E4 of Sport England's Playing Fields Policy. This states that 'the playing field or playing fields which would be lost as a result of the proposed development must be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of development'.

Since the introduction of 3G pitches and given their popularity for football, providers have seen this as a way of replacing their tired sand-based carpet and generating money from hiring out a 3G pitch to football clubs and commercial football providers. This has come at the expense of hockey, with players now travelling further distances to gain access to a suitable pitch and many teams being displaced from their preferred geographical area.

Due to its impact on hockey, it is appropriate to ensure that sufficient sand-based AGPs are retained for the playing development of the sport. To that end, a change of surface should require a planning application and, as part of that, the applicants should have to show that there is sufficient provision available for hockey in the locality. Opportunities to incorporate this into planning policy should therefore be explored, and advice from Sport England and EH should also be sought prior to any planning application being submitted.

It should also be noted that, if a surface is changed, it could require the existing floodlighting to be changed and, in some instances, noise attenuation measures may need to be put in place.

The 3G surface is limited in the range of sport that can be played or taught on it. Those proposing a conversion should take advice from the appropriate sports' governing bodies or refer to Sport England guidance 'Selecting the Right Artificial Grass Surface which can be found on Sport England's website:

https://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/artificial-sports-surfaces/

Recommendation 2 - Managing the football-hockey demand interface: Football clubs in the borough currently use 24 hours per week of midweek artificial grass pitch time for training purposes, displacing some hockey demand. Managing this demand via co-operative working between the FA and England Hockey is key to ensuring that all existing hockey pitches are retained and that additional '3G' pitches provision is made to redeploy demand from football for sports lit training/match facilities. England Hockey will also support schools with hockey pitches with business modelling for hockey-only pitch operation.

8.11.3 Enhance

Recommendation 3 - Maintaining existing pitch capacity: The pitches in the borough will all need to be resurfaced in the next five years to ensure that they remain usable.

8.11.4 Provide

Recommendation 4 - Developer contributions and external funding: It is recommended that the action plan in the Tonbridge and Malling PPS be used as the basis for seeking an appropriate level of financial contributions under S106 developer contributions and/or through applications for external funding to cover the capital and revenue implications of securing additional hockey pitch capacity to meet the needs of the additional population arising from housing growth by 2041.

8.12 Action Plan

8.12.1 Introduction

In the context of the high-level recommendations above, the tables below set out the hockey action plan to guide the implementation of the Study. The abbreviation stands for TMBC - Tonbridge and Malling Borough Council.

8.12.2 Key strategic actions

Issues	Action	Lead	Partners	Resources	Priority
Securing developer contributions	Ensure that policy provision is made to secure developer contributions towards additional hockey pitch capacity and ancillary facilities.	TMBC	Developers	Determined by Sport England's New Development Calculator	High
Sports lighting energy efficiency	Replace old sports lighting with LED heads and upgrade switching gear	Site owners	-	£30,000 per site	Medium

8.12.3 Site specific actions

Site	Issues	Action	Lead	Partners	Resources	Priority
K-Sports	Hockey use excluded from the site.	Identify an alternative site to provide a new pitch	TMBC	K-Sports England Hockey	£980,000 for a new pitch	High
Tonbridge School	Need to create additional capacity for K-Sports HC	Displace football use to new '3G' pitches.	TMBC	Tonbridge School	Costed in the football action plan.	High

9 BASEBALL PITCH NEEDS

9.1 Organisational context

- ***British Baseball Federation:*** The British Baseball Federation is the governing body of the sport and supports the development of the game in Tonbridge and Malling.
- ***Affiliated Clubs:*** Three Baseball clubs are based in Tonbridge and Malling, collectively providing seven teams.

9.2 Strategic context

9.2.1 National lacrosse strategy

The British Baseball Federation's *'Baseball Facilities Survey'* (2023) identifies the following actions:

- Work with suppliers to provide better options for clubs.
- Allocate funding specifically for Youth Facilities.
- Support clubs to secure Land Access Agreements.
- Establish Facility Standards for al clubs.
- Encourage clubs to host Saturday Games.

9.2.2 Neighbouring local authorities

Maidstone Borough Council

There is no baseball activity in the borough and therefore the *'Maidstone Playing Pitch Strategy'* (2019) does not include an assessment of baseball needs.

Tunbridge Wells Borough Council

There is no baseball activity in the borough and therefore the *'Tunbridge Wells Playing Pitch strategy 2017 - 2033'* (2017) does not include an assessment of baseball needs.

Sevenoaks District Council

There is no baseball activity in the district and therefore the *'Sevenoaks Playing Pitch Strategy'* (2018) does not include an assessment of baseball needs.

Gravesham Borough Council

There is no baseball activity in the borough and therefore the *'Gravesham Playing Pitch Strategy'* (2016 does not include an assessment of baseball needs.

Medway Council

The Kent Mariners Baseball Club is based in Rochester, but the *'Medway Playing Pitch Strategy'* (2019) does not include an assessment of baseball needs.

9.3 Baseball demand

9.3.1 Expressed demand

The following clubs are based in Tonbridge and Malling and affiliate to the British Baseball Federation:

Club	*Home courts*	*No. teams*
Tonbridge Baseball Club	Borley Field, The Slade	2
Hurricanes Baseball Club	Williams Field, Hadlow	3
Kent Buccaneers Baseball Club	Williams Field, Hadlow	2
TOTAL	***-***	***7***

9.3.2 Displaced demand

Displaced demand relates to play by players from within the study area which takes place outside of the area, or vice versa. There is no evidence of any displaced demand for baseball in Tonbridge and Malling.

9.3.3 Unmet demand

Unmet demand takes a number of forms:

- Teams may have access to a pitch for matches but nowhere to train or vice versa.
- Some pitches may be unavailable to the community.
- The poor quality and consequent limited capacity of pitches in the area and/or a lack of provision and ancillary facilities which meet a certain standard of play/league requirement.

There is no evidence of unmet demand for baseball pitches in Tonbridge and Malling at present.

9.3.4 Latent demand

Whereas unmet demand is known to currently exist latent demand is demand that evidence suggests may be generated from the current population should they have access to more or better provision. There is no evidence of latent demand for baseball in Tonbridge and Malling at present.

9.4 Baseball pitch supply

9.4.1 Quantity

The pitches included in the analysis are defined as permanently marked for baseball.

Site	*Address*	*Sub-area*
Borley Field	The Slade, Tonbridge TN9 1HR	Tonbridge
Williams Field	Marshall Gardens Hadlow TN11 0HQ	Tonbridge

Pitches by sub-area are as follows:

Sub-area	Population	No. Pitches	Pitches per capita
Tonbridge and surrounds	56,018	2	1: 28,009
Mallings and surrounds	76,182	0	-
TONBRIDGE & MALLING	***132,200***	***2***	***1: 66,100***

9.4.2 Quality

The quality of baseball pitches was assessed by a non-technical visual inspection during a site visit to all facilities. The criteria that were assessed were as follows:

- ***Playing surface:*** Infield and outfields surface, grass cover, lines, foul posts, pitcher's mound, bases and batter's boxes.
- ***Safety surrounds:*** Fencing and warning signs.
- ***Changing provision:*** Changing, social and ancillary facilities.
- ***Disabled access:*** Provision for disabled access to the facilities.
- ***General access:*** Parking, signage and proximity to public transport.

The facilities were rated on a five-point scale, where 5 equates to 'very good' (highlighted in green below), 4 to 'good', 3 to 'average', 2 to 'poor' and 1 to 'very poor'. The ratings for the baseball pitches in Tonbridge and Malling are below.

Facility	Field	Fencing	Changing	Disability Access	General access
Borley Field	4	5	4	2	5
Williams Field	4	5	4	3	4

9.4.3 Pitch maintenance

Each site owner employs a grounds maintenance contractor to maintain their pitches.

9.4.4 Ownership, management and security of access

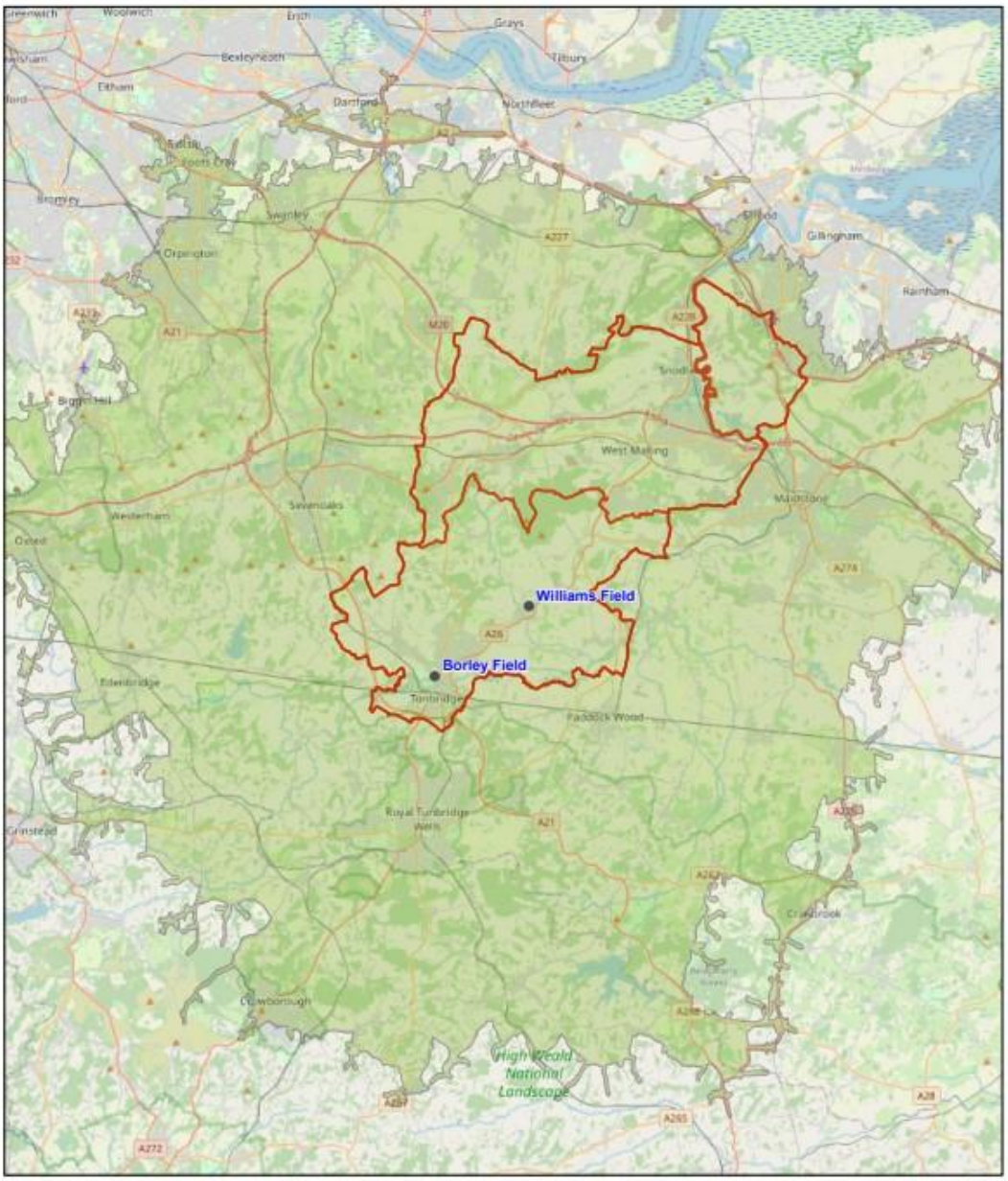
The ownership, management and security of community access of baseball pitch sites is detailed below. Security of access refers to the extent to which community use is protected (through public ownership, community use agreements etc.), rather than the security of tenure of specific club users.

Club	Basis of use	Access
Borley Field	Club use only	Secured
Williams Field	Club use only	Secured

9.4.5 Geographical distribution

The geographical distribution of baseball pitches in Tonbridge and Malling has been assessed by identifying catchments to illustrate local accessibility. This is based on the results of the clubs' survey, which identifies 20-minutes travel time as the typical maximum. Based upon this, the map overleaf shows that the entire local population is within the catchment of at least one pitch.

Tonbridge and Malling - Baseball Pitches 30 minutes drive



9.4.6 The views of stakeholders on pitch supply

British Baseball Federation: Consultation with British Baseball Federation identified that:

- The sport is buoyant in Tonbridge and Malling.

- There are three active clubs in the borough.

Tonbridge Baseball Club: The Club was established in 1982 and runs two adult teams, the Wildcats and the Bobcats. It is based at Borley Field at The Slade in Tonbridge and has 40 members aged 14 and over, from complete beginners to advanced players.

Kent Buccaneers Baseball Club: The Club was founded in 2017 and has been growing rapidly ever since. We currently have two adult teams (first team and development team) as well as a growing youth academy. Its home ground is in Hadlow at one of the best baseball facilities in the south-east of England, which has hosted a number of different events/tournaments including the 2021 British Baseball Federation Triple A Playoffs.

Hurricanes Baseball Club: Hurricanes Youth Baseball Club was founded in 2015 and is fully inclusive for both boys and girls ages 5-14 years. Hurricanes Adult Baseball Club was created in 2022 to allow the children a natural progression into adult baseball. Anyone 14 years or over can play adult baseball for the Hurricanes from the 2023 season. It has two mixed adult teams competing in the British Baseball Federation Leagues.

9.5 The implications for Baseball in Tonbridge and Malling

Analysis of local supply and demand for baseball pitches in Tonbridge and Malling indicates the following:

- ***Local Clubs:*** There are three local clubs that currently meet all local baseball needs.
- ***Demand levels:*** Spare capacity at the sites used by both clubs will be sufficient to meet additional future demand to 2041.

9.6 Assessment of current needs

To assess whether the current supply of pitches is adequate to meet existing demand an understanding of the situation at all sites available to the community needs to be developed. This is achieved by providing a brief overview for each site, which comprises:

- A comparison between the carrying capacity of a site and how much demand currently takes place there. The carrying capacity of a site is defined as the amount of play it can regularly accommodate without adversely affecting its quality and use. Demand is defined in terms of the number of 'match equivalent' sessions at each site.
- An indication of the extent to which pitches are being used during their peak periods.

The site overviews identify the extent to which pitches are:

- ***Being overplayed:*** Where use exceeds the carrying capacity.
- ***Being played to the level the site can sustain:*** Where use matches the carrying capacity.
- ***Potentially able to accommodate some additional play:*** Where use falls below the carrying capacity.

In the absence of any formal guidance on pitch carrying capacity for baseball, the assessment below assumes the same capacity as adult football pitches, namely a 'good' quality pitch can accommodate 3.0 match equivalent sessions per week, a 'standard' quality pitch 2.0 match equivalent sessions per week and a 'poor' quality pitch 1.0 match equivalent sessions per week.

Site	Pitches	Users	Weekly capacity	Weekly demand	Weekly balance	Peak capacity	Peak demand	Peak balance
Borley Field	1	Tonbridge Baseball Club	3.0	2.0	+1.0	1.0	1.0	Balanced
Williams Field	1	Hurricanes Baseball Club Kent Buccaneers BC	3.0	5.0	-2.0	1.0	1.0	Balanced
TOTALS	***2***	***-***	***6.0***	***7.0***	***-1.0***	***2.0***	***2.0***	***Balanced***

The assessment shows Supply and demand are balanced in the peak period, but that there is an overall capacity shortfall at Willams Field. This is managed through fixture scheduling.

9.7 Assessment of future needs

9.7.1 Population growth

Two scenarios are considered:

- The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).
- Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 or 27.7%.

9.7.2 Potential changes in demand

It seems likely that demand for baseball will remain at its current levels in Tonbridge and Malling.

9.7.3 Site-specific pressures

There are no known site-specific pressures.

9.7.4 Potential changes in supply

There are no known changes in supply.

9.7.5 Existing spare capacity

There is some spare capacity at Borley Field.

9.7.6 Future baseball pitch needs

Future baseball pitch needs are modelled below using 'Team Generation Rates' (TGRs), which identify how many people in a specified age group in the borough are required to generate one team. These are then applied to projected changes in population to identify the likely number of teams in the future:

Team type	Age range	Current population	Current teams	TGR	Population 2041	Teams 2041	Extra teams
Adult males	17-45	22,054	3	1: 7,351	23,088	3	0
Adult females	17-45	23,697	2	1: 11,849	25,726	2	0
Junior males	10-16	6,813	1	1: 6,813	6,767	1	0
Junior females	10-16	6,116	1	1: 6,116	6,010	1	0

9.8 Key findings and issues

9.8.1 What are the main characteristics of current supply and demand?

- ***Local Clubs:*** There are three local clubs serving Tonbridge and Malling.
- ***Unmet demand:*** There is no evidence of any displaced, unmet or latent demand.
- ***Future demand:*** Future demand patterns are likely to be similar to current levels, based on participation trends and population projections.
- ***Facilities supply:*** There are two baseball facilities in the borough, which meet all current and future needs.
- ***Facility quality:*** The quality of most aspects of both facilities is at least 'standard', although disability access is 'poor' quality at Borley Field.

9.8.2 Is there enough accessible and secured community use to meet current demand? ***YES***

Existing pitch provision meets all baseball's current needs, with the weekly capacity shortfall at Williams Field managed through fixture scheduling.

9.8.3 Is the accessible provision of suitable quality and appropriately maintained? ***YES***

The pitches used for baseball are all 'good' quality.

9.8.4 What are the main characteristics of future supply and demand?

- ***Population growth:*** Two scenarios are considered:
  - The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).
  - Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 or 27.7%.

- ***Changes in demand:*** Demand projections indicate no additional teams by 2041.
- ***Changes in supply:*** There are no known projected changes in pitch supply.
- ***Existing spare capacity:*** Existing pitch provision meets all baseball's current needs, with the weekly capacity shortfall at Williams Field managed through fixture scheduling.
- ***Future needs:*** Future needs can be accommodated by using existing capacity.

9.8.5 Is there enough accessible and secured provision to meet future demand? ***YES***

All future needs can be met by existing pitch sites in the borough.

9.9 Policy recommendations

9.9.1 Introduction

The recommendations in relation to baseball are made in the context of the National Planning Policy Framework (NPPF), which stipulates that existing open space including playing pitches, should not be built upon unless:

- An assessment has taken place which has clearly shown the open space to be surplus to requirements, or
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality, in a suitable location, or
- The development is for alternative sport and recreation provision, the needs for which clearly outweighs the loss.

9.9.2 Protect

Recommendation 1 - Safeguarding existing provision: The Tonbridge and Malling PPS comprises a robust and evidence-based assessment of current and future needs for baseball in the borough. The PPS identifies a need for all current baseball pitch sites to be retained and protected on the basis of the specific identified roles that each can play in delivering the needs of the sport in Tonbridge and Malling both now and in the future. It is therefore recommended that planning policies continue to support the retention of all sites based upon the evidence in the PPS. If any pitch sites do become the subject of development proposals, this will only be permissible if they are replaced and meet policy exception E4 of Sport England's Playing Fields Policy. This states that 'the playing field or playing fields which would be lost as a result of the proposed development must be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of development'.

9.9.3 Enhance

Recommendation 2 - Enhancing existing facilities: Disability access is 'poor' at Borley Field and 'standard at Williams Field. It is recommended that the site owners should be supported to improve pitch quality, including the receipt of developer contributions (see below) where the usage capacity would be enhanced.

Recommendation 3 - Developer contributions and external funding (enhancements): Most of the demand for baseball arising from the proposed housing development in Tonbridge and Malling to 2041 can be accommodated through enhancements to existing pitches and facilities. It is recommended that the site-specific action plan in the Tonbridge and Malling PPS be used as the basis for determining facility enhancements that demonstrably relate to the scale and location of specific developments and that an appropriate level of financial contributions be sought under S106 developer contributions and/or through applications for external funding to cover the capital and revenue implications of the enhancements.

9.10 Action Plan

9.10.1 Introduction

In the context of the high-level recommendations above, the tables below set out the baseball action plan to guide the implementation of the Study. The abbreviation TMBC stands for Tonbridge and Malling Borough Council

9.10.2 Key strategic actions

Issues	Action	Lead/ Facilitator	Partners	Resources	Priority
Securing developer contributions	Ensure that policy provision is made to secure developer contributions towards new and improved baseball facilities.	TMBC	Developers Local clubs	-	High

9.10.3 Site specific actions

Site	Issues	Action	Lead	Partners	Resources	Priority
Borley Field	'Poor' quality disabled access.	Improve disabled access	TMBC	Tonbridge BC	TBC	Medium
Williams Field	Pitch used to over-capacity.	Schedule fixtures	Hurricanes BC Kent Buccaneers BC	-	-	High

10 TENNIS COURT NEEDS

10.1 Organisational context

- ***Lawn Tennis Association:*** The Lawn Tennis Association is the governing body of the sport and supports the development of the tennis and Padel in Tonbridge and Malling.
- ***Affiliated Clubs:*** There are eight LTA-affiliated tennis clubs in Tonbridge and Malling.

10.2 Strategic context

10.2.1 National tennis strategy

The LTA's Vision is 'tennis is for everyone. All ages, all backgrounds, all levels of fitness, all abilities. Anyone can pick up a racket, anyone can be part of the tennis family'. Its Strategic Plan 2024 - 2026 *'Tennis for Britain'* (2024) contains the following priorities:

- Embed and grow LTA Youth across all venues and in the hearts and minds of children, parents, and the tennis workforce.
- Engage with and promote different formats of the sport and ways to play and enable a flexible approach to equipment to support positive experiences for adult players.
- Deliver resilient digital services, transformational digital products, and increase nationwide adoption of LTA Play Tennis.
- Implement and support comprehensive parks tennis operating models, particularly through Free Parks Tennis, Local Tennis Leagues and programme delivery in parks.
- Develop and enhance our support and engagement with Local Authorities, Active Partnerships, our Member Organisations, venues and operators to open up tennis.

10.2.2 Neighbouring local authorities

Outdoor sports facilities strategies in neighbouring districts identify cross-boundary issues:

Maidstone Borough Council

The *'Maidstone Pitch Strategy'* (2019) identifies that 'There is sufficient spare capacity at existing tennis courts to cater for all additional demand to 2031, although localised concentrations of demand in areas such as Bearstead and Staplehurst do justify some additional provision'.

Tunbridge Wells Borough Council

The *'Tunbridge Wells Playing Pitch strategy 2017 - 2033'* (2017) does not include an assessment of tennis needs.

Sevenoaks District Council

The *'Sevenoaks Playing Pitch Strategy'* (2018) identifies that the district 'is currently over supplied by 21.5 tennis courts' but this will reduce to a surplus of one sports lit court with projected future demand.

Gravesham Borough Council

The *'Gravesham Playing Pitch Strategy'* (2016) identifies that 'the current number of courts can accommodate both current and future demand'.

Medway Council

The *'Medway Playing Pitch Strategy'* (2019) concluded that club courts are used to over-capacity, but that there is spare capacity at parks courts and 'there is enough accessible tennis provision to meet future demand on public courts'.

10.2.3 Implications of the strategic context

Tennis is embarking on an ambitious effort to attract new and lapsed participants and its programmes will be supported by strategic initiatives at county and local level to implement its strategy.

10.3 Stakeholder consultation

10.3.1 Lawn Tennis Association

Consultation with the Lawn Tennis Association highlighted the following issues:

- Tennis is healthy in Tonbridge and Malling with a number of thriving local clubs although provision for casual play at parks and recreation grounds is limited.
- The LTA's vision for tennis is 'Tennis Opened Up' and the mission is to grow tennis by making it more relevant, accessible, welcoming and enjoyable. Strategic initiatives at county and national level aim to support this. 'The LTA would welcome more 'Pay and Play' opportunities in line with our 'Tennis Opened Up' vision in Tonbridge and Malling'.
- Park tennis courts are vital in helping open up the sport. Over 1.7 million adults play tennis on a park court every year, 44% of people who play tennis each year do so in a park (in comparison 20% played in a club setting). 3.4 million children aged 4 - 15 played tennis over the course of the year. Over a third (35%) said they had played on a park court. Key barriers to participating are finding, booking and accessing a court and finding someone with whom to play. The four courts at the Racecourse Sports Ground in Tonbridge are subject to seasonal flooding, which reduces their capacity for use.
- Most clubs in Tonbridge and Malling are operating at close to capacity. This is linked to a 45% increase in club membership nationally with the number of adults playing tennis in Great Britain increased by 43% in 2022 rising from 3.3 million to 4.7 million which is the highest total recorded since 2017.
- The LTA Quick Access Loan Scheme provides interest-free loans to help venues deliver projects that will grow the number of people playing tennis and Padel. The scheme is a part of the LTA's mission to grow tennis and Padel by making it accessible, welcoming, and enjoyable to all. To attract new players within local communities it's critical that there's access to quality all year-round facilities and therefore the LTA will be prioritising the installation and construction of covered courts and new-build floodlights and Padel.
- The LTA's vision is to open tennis up, and we want to make it more relevant, accessible, welcoming and enjoyable for anyone who has an interest. To achieve this, we need to break down barriers to entry and grow the game by bringing new and different audiences into our sport. One of our key strategies is to find new ways to grow participation, and padel is a fantastic example of that. It's an innovative format of tennis that's fun, sociable and easy to play. It can be played in groups of mixed ages and abilities due to it not being power dominant, and so is ideal for friends and families. The popularity of Padel is

growing in Great Britain, and with focus placed on increasing infrastructure, the LTA project to have a total of 400 padel courts in place by 2023. With currently two Padel courts in the borough, there is Padel growth potential for Tonbridge and Malling. Multi-sports sites are favoured and Tonbridge Farm could be a possible location in this regard'

10.3.2 Local tennis clubs

A questionnaire survey was circulated by the LTA on behalf of the project team to all eight LTA-affiliated clubs in Tonbridge and Malling. Five clubs responded.

- Collectively, the LTA-affiliated clubs in the borough have 3,970 members.
- Demand for tennis locally shows a slight increase over the past three years, with two clubs reporting increased membership numbers and three with static membership. No club has a current waiting list.

10.3.3 Hildenborough Tennis Club

The club commented that 'we are planning court resurfacing in next few years. Annual wash (paint where necessary). Possible extension of fencing for viewing area/improve drainage'.

10.3.4 Igtham Tennis Club

The club made the following comments:

- 'Whilst we don't experience any operational problems at present due to our hardworking volunteer committee, I should acknowledge that we don't have any disabled WC facilities, not disabled access to our clubhouse but this hasn't actually proved a problem to date'.
- 'Our current priorities are improving clubhouse facilities internally and providing external storage for chairs and court cleaning equipment. Also providing a bench for viewing courts. Also replanting a tree that had to be felled because falling leaves causing a problem on courts'.

10.3.5 Offham Tennis Club

The club commented that 'the main issue for us is recruiting and retaining members'.

10.3.6 Tonbridge Lawn Tennis Club

The club made the following comments:

- 'The club operates from six good quality, tarmacadam, sports lit courts at Hugh Christie College. Ancillary facilities are pavilion and toilets adjacent to the courts; these are in poor condition'.
- 'The facilities stand on land owned by the school and leased to the club via the Hugh Christie Sports Association. The current lease has about eleven years to run'.
- 'The club has access to the courts each evening and at weekends (from 9.30am). There is also daytime access during school holidays. The school has access during the daytime but utilisation is slow and has been for many years'.
- 'Site access is controlled by a keypad on the entrance to the school car park'.
- 'The location of the courts constrains the club's development in a number of ways:

- There is no daytime access for 40 weeks of the year, thus deterring membership for older players, shift workers etc.
- The courts are hidden from general view. This lack of visibility to 'passing trade' considerably reduces awareness of the club and its activities.
- The poor ancillary facilities are a disincentive to potential new members.
- There are problems with court use in winter. These arise from the height of the school buildings which prevents sunlight reaching parts of the court which can, therefore, remain frozen in cold weather.
- There is a high turnover of coaches due to the restrictions on coaching hours'.

- 'The club would like to relocate to a venue with all day access, better visibility and a higher level of footfall. Some discussions took place with TMBC about relocation to Tonbridge Farm sports park. The club would like to re-open this proposal'.
- 'In Spring 2022, the council was originally enthusiastic of this proposal but cooled their interest in Winter 2022'.
- 'The club is aware there is a sum of £207,840 set aside for facilities development at Tonbridge Farm from Section 106 agreements. This could be used to fund the relocation. The club may also be willing to consider some form of community access on a pay-and-play basis which could save the TMBC money on refurbishing the public courts in at Tonbridge Racecourse sports ground which are in a poor state of repair'.
- 'Relocation to Tonbridge Racecourse is discounted as the courts are prone to flooding'.

10.4 Tennis Court Demand

10.4.1 Introduction

This section summarises the demand for tennis in Tonbridge and Malling and includes:

- National tennis demand patterns.
- LTA-affiliated clubs in Tonbridge and Malling.
- Displaced demand.
- Latent and unmet demand.
- Future demand.

10.4.2 National demand patterns

LTA data on national tennis playing demand patterns is instructive for interpreting activity patterns in Tonbridge and Malling:

Parks courts: The importance of parks courts is emphasised by the following data:

- Over 1.7 million adults play tennis on a park court each year.
- 44% of people who play tennis each year do so in a park, compared with 20% that do so in a club setting.
- 3.4 million children aged 4 - 15 play tennis each year and more than one-third (35%) played on a park court.
- Key barriers to participating are finding, booking and accessing a court and finding someone to play with.

Parks tennis: The majority of participation in the UK takes place in a park environment

- The park environment is the most common place where new participants will start their tennis journey. For those that don't play, the majority of people who have expressed an interest in playing would see the park environment as their first option for play.
- Participation in parks is often less frequent and generally aligns with the seasonal participation peaks in the summer months. This trend is not helped by the lack of sports lit provision that currently exists in the park environment.
- Park players are generally more interested in recreational play and are less reliant on organised activity.
- Park players are most dissatisfied with the condition of the courts, the number of courts available and the journey from booking a court to the actual play. The LTA in partnership with the government are upgrading 4,500 park courts to enable greater levels of participation within park environments.
- The LTA has successfully implemented technology that improves the customer journey to court. This involves the use of an access gate with key-pad entry which is connected to the Clubspark venue management system. When a booking is made an automated code is generated and sent to the customer, thus allowing access to the court during the allocated booking time. Where implemented, the system has been successful in increasing participation rates, whilst also generating income that helps to improve the financial sustainability of a venue.
- The LTA is looking to significantly increase the number of gate access systems that are installed national as part of the Digital Participation Pathway. The courts at the Racecourse Recreation Ground would benefit from gate access.
- Padel is still very early in development in parks, however the LTA is keen to see this development and see this as a natural offer alongside multi-sport and tennis provision.

Club tennis: The club environment is a very important sector for participation.

- Whilst the level of participation is higher in parks, the regularity of play generally increases in the club market.
- The club market has a higher focus on organised activity both via coaching and competition.
- There has an increase in the number of clubs that are looking to implement online booking systems and the gate access technology. This not only offers the ability to increase the amount of court usage at a venue but acts as a key marketing tool locally in the quest to attract more users to a venue initially and create a higher level of exposure locally.
- A clear environment for the further development of padel, working alongside existing tennis provision.

10.4.3 Tonbridge and Malling Clubs

Tennis clubs in Tonbridge and Malling and the outdoor courts where they play are as follows.

Club	Site	Adult members	Junior members
David Lloyd (Kings Hill)	David Lloyd (Kings Hill)	1,229*	1,544*
Hildenborough TC	Riding Lane Recreation Ground	58	125
Igtham Tennis Club	Igtham Recreation Ground	156	117
Kings Hill Community TC	Kings Hill Sports Park	60	150
Offham Tennis Club	Offham tennis courts	60	20
Plaxtol and Shipbourne TC	Plaxtol and Shipbourne TC	40	20
Trottiscliffe Tennis Club	Trottiscliffe Tennis Club	130	80
Tonbridge Tennis Club	Hugh Christie Technology College	101	80
TOTALS	**-**	***1,834***	***2,136***

* Includes use of five indoor courts.

10.4.4 Displaced demand

Displaced demand relates to play by teams from within the study area which takes place outside of the area, or vice versa. Based upon the results of the clubs' survey, there is no evidence of any displaced demand for tennis.

10.4.5 Unmet demand

Unmet demand takes a number of forms:

- Players may have access to a court for matches but nowhere to train or vice versa.
- Some facilities may be unavailable to the community.
- The poor quality and limited capacity of facilities and/or a lack of provision and ancillary facilities which meet a certain standard of play/league requirement.

There is some evidence of unmet demand for outdoor tennis courts in Tonbridge and Malling, with Tonbridge Tennis Club constrained by its current facilities..

10.4.6 Latent demand

Whereas unmet demand is known to currently exist latent demand is demand that evidence suggests may be generated from the current population should they have access to more or better provision. The LTA's demand profiling modelling for Tonbridge and Malling identifies latent demand from an additional 555 potential tennis players.

10.4.7 Future demand

This has been assessed as follows:

- ***Participation rates:*** Sport England's 'Active Lives' survey has recorded adult (16+) weekly participation rates for tennis at national level since 2015:

Nov '15 - Nov '16	May '16 - May '17	Nov '16- Nov '17	May '17- May '18	Nov '17- Nov '18	May '18- May '19	Nov '18-Nov '19	May '19- May '20	Nov '19-Nov '20	May '20- May '21	Nov '20-Nov '21	Nov '21-Nov '22	% Change
6.8%	7.0%	6.9%	6.6%	6.2%	6.0%	5.9%	6.0%	6.1%	5.8%	5.1%	6.0%	-0.8%

- ***LTA national adult tennis participation rates:*** The LTA's participation data for 2022 shows and upward trend in participation rates for adult tennis (people aged 16 and over):

  - The number of adults reporting that they had played tennis during the year increased 43% compared to the previous year, rising from 3.3 million to 4.7 million from January through to December. This is the highest total recorded since 2017 and has continued the growth seen in 2018-19 which was interrupted during the pandemic.
  - In addition, more than two million adults play monthly, and this is the highest level recorded since the LTA started tracking this measure seven years ago.
  - This means that the LTA has achieved the targets set out in its five-year 2018-23 strategy for adult annual and monthly participation one year ahead of schedule.
  - Finally, children's weekly participation in tennis has seen positive growth in the past year with over three and a half million children playing tennis with an extra 328,000 children playing tennis in schools.

Frequency of play	*Feb-Apr 2018*	*Feb-Apr 2019*	*Feb-Apr 2020*	*Feb-Apr 2021*	*Feb-Apr 2022*	*% Change*
Past year	7.29%	6.91%	7.77%	5.20%	8.11%	+0.81%
Past month	2.07%	2.23%	2.09%	1.18%	3.24%	+1.17%

- ***LTA junior tennis participation rates:*** The LTA's participation data shows and upward trend in participation rates for junior tennis (people aged between 4 and 15):

Apr 2020	*Apr 2021*	*Apr 2022*	*% Change*
9%	11%	15%	+4%

- ***Population growth:*** Two scenarios are considered:

  - The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).
  - Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 or 27.7%.

10.4.8 Key findings on demand

The key findings on demand are as follows:

- There are eight local clubs serving Tonbridge and Malling.
- Club-based play is supplemented by casual tennis at parks and free-to-access courts.
- There is some evidence of unmet demand for outdoor tennis courts at Tonbridge LTC in particular.

Future demand patterns are likely to be similar to current levels, based on participation trends but the higher population projections will create a requirement for 15.6% additional capacity by 2041 under the lower population projections and 27.7% under the higher projections.

10.5 Tennis Court Supply

10.5.1 Introduction

This section summarises the detail of outdoor tennis court supply in Tonbridge and Malling. The courts included in the analysis are defined as hard, all-weather courts permanently laid out with regulation markings for tennis.

10.5.2 Courts with community use and used

Site	*Address*	*Sports lit courts*	*Non-sports lit courts*	*Sub-area*
Borough Green Recreation Ground	Maidstone Road, Borough Green TN15 8SD	-	2 tarmac	Mallings
David Lloyd (Kings Hill)	Kings Hill Avenue, West Malling ME19 4UA	5 tarmac	-	Mallings
Hildenborough Tennis Club	Rising Lane, Hildenborough TN11 9HJ	2 tarmac	1 tarmac	Tonbridge
Hugh Christie Technology College	White Cottage Road, Tonbridge TN10 4PU	6 tarmac	-	Tonbridge
Igtham Tennis Club	Sevenoaks Road, Igtham TN15 9AD	2 artificial grass	-	Mallings
Kings Hill Sports Park	Beacon Avenue, West Malling ME19 4QP	4 tarmac	2 tarmac	Mallings
Offham TC	Church Road, Offham ME19 5NY	-	2 tarmac	Mallings
Plaxtol and Shipbourne TC	Upper Green Road, Shipbourne TN11 9PN	-	2 tarmac	Mallings
Racecourse Sports Ground	The Slade, Tonbridge TN9 1HR	-	4 tarmac	Tonbridge
Russett Road Tennis Court	Russett Road, East Peckham TN12 5BS	-	1 tarmac	Tonbridge
Southward Playing Field	New Road, East Malling ME19 6DN	-	2 tarmac	Mallings
Tonbridge School	London Road, Tonbridge TN10 3AD	3 clay	-	Tonbridge
Trottiscliffe TC	Church Lane, Trottiscliffe ME19 5EB	2 carpet	-	Mallings
West Malling Village Hall	Norman Road, West Malling ME19 6RW	-	2 tarmac	Mallings
TOTALS	***-***	***22 courts***	***18 courts***	***-***

10.5.3 Courts by sub-area

Courts with community use and used by sub-area are as follows. It shows that there is a reasonably geographically equitable distribution of provision across the borough:

Sub-area	*Population*	*No. Courts*	*Courts per capita*
Tonbridge and surrounds	56,018	17	1: 3,295
Mallings and surrounds	76,182	23	1: 3,312
TONBRIDGE & MALLING	***132,200***	***40***	***1: 3,305***

10.5.4 Padel courts with community use

Site	*Address*	*Courts*	*Sub-area*
Tonbridge Golf Centre	Cannon Lane, Tonbridge TN9 1PP	2	Tonbridge

10.5.5 Tennis courts with no community use

The following courts are not available for community use:

Site	Address	Sports lit courts	Non-sports lit courts	Sub-area
Aylesford School	Teapot Lane, Aylesford ME20 7JU	-	6 tarmac	Mallings
Bishop Chavasse Primary School	Baker Lane, Tonbridge TN11 0FB	-	1 tarmac	Tonbridge
Hadlow College	Tonbridge Rd, Hadlow TN11 0AL	-	1 tarmac	Tonbridge
Hilden Grange School	Dry Hill Park Road, Tonbridge TN10 3BX	-	2 tarmac	Tonbridge
Hillview School for Girls	Brionne Gardens, Tonbridge TN9 2HE	-	3 tarmac	Tonbridge
Judd School	Brook Street, Tonbridge TN9 2PN	-	2 tarmac 2 artificial grass	Tonbridge
Tonbridge Grammar School	Deakin Leas, Tonbridge TN9 2JR	-	2 artificial grass	Tonbridge
Weald of Kent Grammar School	Tudeley Lane, Tonbridge TN9 2JP	6 tarmac	-	Tonbridge
TOTALS	***-***	***6 courts***	***19 courts***	***-***

10.6 Quality

10.6.1 The criteria assessed for tennis courts

The quality of tennis courts was assessed by a non-technical visual inspection during a site visit to all facilities. The criteria that were assessed were as follows:

- ***The court:*** Court surface, line markings and fitness for purpose.
- ***Fencing:*** Condition and appearance.
- ***Disability access:*** Provision for disabled access to the courts.
- ***General access:*** Parking, signage and proximity to public transport.
- ***Lighting:*** The quality, illumination levels and evenness of floodlights.

10.6.2 The basis of the ratings

The facilities were rated on a five-point scale, where 5 equates to 'very good' (highlighted in green below), 4 to 'good' (also highlighted in green below), 3 to 'average' (highlighted in yellow below), 2 to 'poor' (highlighted in red below) and 1 to 'very poor' (also highlighted in red below).

10.6.3 Tennis court assessment

The ratings for tennis courts in Tonbridge and Malling are shown in the table below.

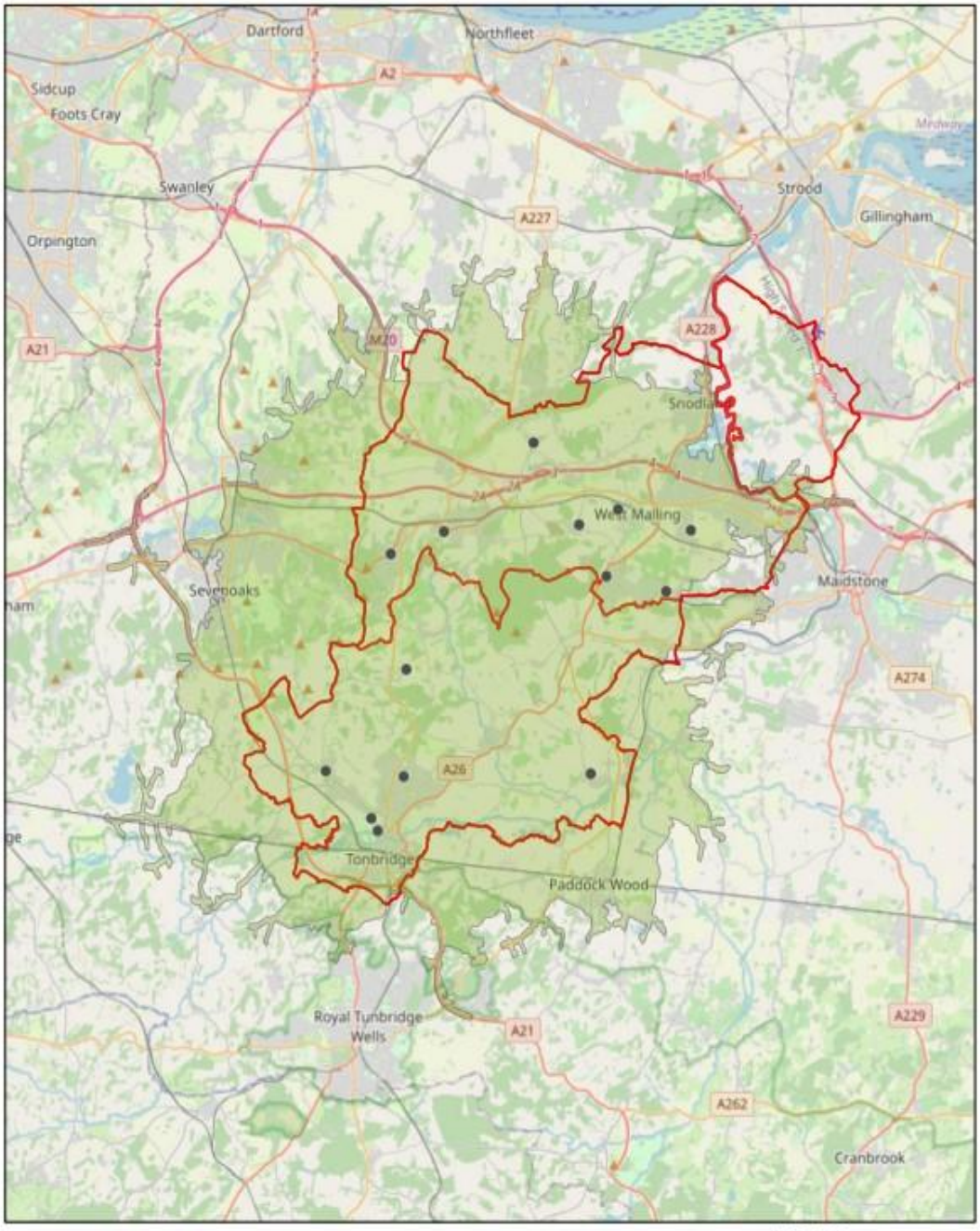
Facility	Courts	Fencing	Disability	Changing	Lighting
Borough Green Recreation Ground	2	2	1	-	-
David Lloyd (Kings Hill)	5	5	4	5	5
Hildenborough Tennis Club	5	5	3	2	4
Hugh Christie Technology College	5	5	3	2	5
Igtham Tennis Club	5	5	2	4	5
Kings Hill Sports Park	5	5	4	5	5

Facility	Courts	Fencing	Disability	Changing	Lighting
Offham Tennis Club	4	4	4	4	-
Plaxtol and Shipbourne TC	3	3	1	2	-
Racecourse Sports Ground	3	3	3	-	-
Russett Road Tennis Courts	3	3	3	-	-
Southward Playing Field	2	3	2	3	-
Tonbridge School	5	5	4	4	5
Trottiscliffe Tennis Club	4	4	4	5	4
West Malling Village Hall	2	2	1	-	-

10.7 Accessibility

The LTA applies a 15 minute drivetime catchment to define accessibility. The map overleaf shows that the whole of Tonbridge and Malling is within 15-minutes' drivetime of a court, apart from a small area in the extreme north-east of the borough.

Tonbridge and Malling - Outdoor tennis courts 15 minutes drive



2/11/2024

1:300,000

0 1.5 3 6 mi

0 2.5 5 10 km

- Outdoor Tennis Courts
- 10.0 Minutes
- Sub Areas - Tonbridge Surrounds and Malling Surrounds
- Tonbridge and Malling District Boundary

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10.8 Availability

The table below identifies the basis of use and cost of tennis court usage in Tonbridge and Malling:

Facility	Basis of use
Borough Green Recreation Ground	Open access during daylight hours
David Lloyd (Kings Hill)	Mon-Fri 6am - 11pm Sat-Sun 7am - 10pm Members only. Membership £94.50 per month
Hildenborough Tennis Club	Mon-Sun 9am - 10pm Members only. Adult annual membership £80, Juniors £25
Hugh Christie Technology College	Mon-Fri 3.30pm - 10pm Sat-Sun 9.30am - 9.30pm Tonbridge TC members only. Adult annual membership £174, juniors £40
Igtham Tennis Club	Mon-Sun 9am - 10pm Adult annual membership £95, juniors £25 Casual hire £10 per hour
Kings Hill Sports Park	Mon-Sun 9am - 10pm Kings Hill Community TC Adult annual membership £84, juniors £30 'Pay-and-play' £3.75 per hour
Offham Tennis Club	Mon-Sun Daylight hours Adult annual membership £30, juniors £15
Plaxtol and Shipbourne TC	Daylight hours Members only. Adult annual membership £35, Juniors £20
Racecourse Sports Ground	Daylight hours 'Pay-and-play' £3.75 per hour
Russett Road Tennis Court	Open access during daylight hours
Southward Playing Field	Open access during daylight hours
Tonbridge School	Mon-Fri 6am - 9pm, Sat 8am - 9pm, Sun 9am - 7.30pm Members only. Membership £69 per month
Trottiscliffe Tennis Club	Mon-Sun 9am - 10pm Adult annual membership £100, juniors £40 'Pay-and-play' £2.50 per hour
West Malling Village Hall	Open access during daylight hours

10.9 Key findings on supply

The key findings are as follows:

- There are 40 tennis courts with community use and used in the borough, 22 of which are sports lit, plus two Padel Tennis courts. In addition, there are a further 25 courts on education sites with no community use.
- The quality of club-owned tennis courts is generally good, but some of the recreation ground courts have 'poor' quality playing surfaces and there are issues with disabled access and changing facilities at four and three sites respectively.
- Accessibility of courts is good, with the entire population within 10 minutes driving time of the nearest facility.
- 11 courts are available for casual use. All other courts are for club members only.

10.10 The balance between tennis court supply and demand

Four criteria have been assessed to evaluate the balance between tennis court supply and demand in Tonbridge and Malling:

- ***Quantity:*** Are there enough courts with sufficient capacity to meet needs now and in the future?
- ***Quality:*** Are the courts fit for purpose for the users now and in the future?
- ***Accessibility:*** Are the courts in the right physical location for the users now and in the future?
- ***Availability:*** Are the courts available for those who want to use them now and in the future?

10.11 Quantity

10.11.1 Current needs

The LTA calculates the capacity of tennis courts in relation to 'Estimated Membership Capacity'. This is applied to club courts, on the basis that:

- A sports lit outdoor court has a capacity of 60 members.
- A non-sports lit outdoor court has a capacity of 40 members.

The results of applying this to courts in Tonbridge and Malling is tabulated below. Capacity shortfalls are shown in brackets and the analysis shows that:

- Three sites are operating at over capacity.
- When aggregated for the borough as a whole, there is a small surplus of provision, equivalent to one non-sports lit court.

Facility	*No. courts*	*Capacity*	*No. members*	*Balance*
Hildenborough TC	3	160	183	(23)
Igtham Tennis Club	2	120	273	(153)
Kings Hill Community TC	6	320	210	110
Offham Tennis Club	2	80	80	Balanced
Plaxtol and Shipbourne TC	2	80	60	20
Trottiscliffe Tennis Club	2	120	210	(90)
Tonbridge LTC	6	360	181	179
TOTALS	***23***	***1,240***	***1,197***	***43***

10.11.2 Future needs

Future demand patterns are likely to be similar to current levels, based on participation trends but the higher population projections will create a requirement for 15.6% additional capacity by 2041 under the lower population projections and 27.7% under the higher projections. This is equivalent to six extra courts for the lower population projection and 11 extra courts under the higher population projection..

10.12 Quality

10.12.1 Current quality

The quality of club-owned tennis courts is generally good, but some of the recreation ground courts have 'poor' quality playing surfaces and there are issues with disabled access and changing facilities at four and three sites respectively.

10.12.2 Future quality

All court providers will need to continue to invest in maintaining and improving their facilities, so if this process can be assisted with funding from developer contributions in the future, it seems reasonable to assume that local provision will continue to be upgraded regularly.

10.13 Accessibility

10.13.1 Current accessibility

The whole of Tonbridge and Malling is within 15-minutes' drivetime of a court, apart from a small area in the extreme north-east of the borough.

10.13.2 Future accessibility

Providing locally accessible outdoor tennis courts as part of the housing developments would be consistent with meeting health and well-being objectives in the new developments.

10.14 Availability

10.14.1 Current availability

11 courts are available for casual use. All other courts are for club members only.

10.14.2 Future availability

Provision should be made for 'pay and play' access to all new courts.

10.15 The options for securing additional tennis court capacity

The options for securing existing and additional tennis court capacity to meet current and future needs are as follows:

10.15.1 Protect

Protecting existing tennis courts through the Local Plan will be key both to securing local provision by ensuring that planning policy supports the retention of existing facilities, unless the loss of a facility would involve its replacement with a facility of at least the equivalent size, quality and accessibility.

10.15.2 Provide

There is a need to provide six additional courts to meet demand arising from the higher population growth projections and there is a case for making locally accessible provision in any major new housing developments.

10.15.3 Enhance

Enhancing existing tennis court capacity by:

- Addressing the disabled access issues at the five sites where this is rated as 'poor'.
- Ensuring that the courts and ancillary facilities receive regular maintenance and improvements, funded by S106 developer contributions where appropriate.
- Considering the addition of floodlights at appropriate sites, particularly in conjunction with netball developments at shared use sites.

The additional lights will extend the time that outdoor facilities can be used, particularly in the winter, thereby increasing the health and well-being benefits they provide.

There are an estimated 3,504 playable daylight hours per year for an unlit court. This would increase to 4,368 hours per year for a sports-lit court, an increase of about 25%. For working adults or school age juniors available (on average) after 5pm on weekdays, the availability increase is even more significant. The additional capacity provided by sports lighting would allow year-round activity and therefore provide more opportunities for local people to maintain healthy and active lifestyles.

10.16 Action Plan

10.16.1 Introduction

The tables below set out the action plan for tennis courts to guide the implementation of the strategy. The capital cost estimates are based upon Sport England's *'Facility Costs - Second Quarter of 2023'* (2023).

10.16.2 Key strategic actions

Issues	*Action*	*Lead*	*Partners*	*Resources*	*Priority*
Protection of existing tennis courts.	Include a policy in the Local Plan to protect all existing tennis courts.	TMBC Planning Policy	Sport England/ Active Kent and Medway	-	High
Funding for future tennis court needs.	Ensure that S106 contributions are collected from developers.	TMBC Planning Development Management	Sport England/ Active Kent and Medway	-	High
Improving the use of parks courts	Investigate gate access technology and Clubspark court booking system.	Court Owners	LTA	TBC	Medium
Provision for Padel tennis	Identify suitable multi-sport sites where Padel tennis courts could be installed.	TMBC	LTA	TBC	High
Sports lighting energy efficiency	Replace old sports lighting with LED heads and upgrade switching gear	Site owners	LTA	£30,000 per site	Medium

10.16.3 Site-specific actions

Site	Issues	Action	Lead	Partners	Resources	Priority
Borough Green Recreation Ground	• Poor quality courts • Poor quality fencing • Poor disability access	• Resurface courts • Provide a tarmac path from the access point	Borough Green PC	-	£10,000 for courts £1,500 for path	High
David Lloyd (Kings Hill)	No current issues	No action	-	-	-	-
Hildenborough Tennis Club	Poor quality changing	Upgrade changing	HTC	LTA	£150,000	High
Hugh Christie Technology College	Poor quality changing	Investigate relocation options for Tonbridge LTC	Tonbridge LTC	TMBC	TBC	High
Igtham Tennis Club	Poor disability access	Provide a tarmac path from the access point	Igtham TC	-	£1,500	Medium
Kings Hill Sports Park	No current issues	No action	-	-	-	-
Offham Tennis Club	No current issues	No action	-	-	-	-
Plaxtol and Shipbourne TC	• Poor changing • Poor disability access	• Upgrade changing • Provide a tarmac path from the access point	P&STC	LTA	£150,000 for changing £1,500 for path	High
Racecourse Sports Ground	Need for gate access to improve utilisation	Install gate access systems	TMActive	LTA	TBC	High
Russett Road Tennis Court	No current issues	No action	-	-	-	-
Southward Playing Field	• Poor quality courts • Poor disability access	• Resurface courts • Provide a tarmac path from the access point	East Malling PC	-	£10,000 for courts £1,500 for path	High
Tonbridge School	No current issues	No action	-	-	-	-
Trottiscliffe Tennis Club	No current issues	No action	-	-	-	-
West Malling Village Hall	• Poor quality courts • Poor quality fencing • Poor disability access	• Resurface courts • Provide a tarmac path from the access point	West Malling PC	-	£10,000 for courts £1,500 for path	High

11 BOWLS GREEN NEEDS

11.1 Organisational context

- ***Bowls England:*** Bowls England is the governing body of the sport and supports the development of the game in Tonbridge and Malling.
- ***Affiliated Clubs:*** There are five Bowls England-affiliated clubs in Tonbridge and Malling.

11.2 Strategic context

11.2.1 Bowls England Strategic Plan

Bowls England's strategic plan '*Fit for the Future: Bowls England Strategy 2021 - 2026'* (2021) contains the following material of relevance:

Target: To target is to create a million more 'bowls experiences' by 2026.

Mission: The mission is 'to promote and develop the sport of bowls across England so it enriches the lives of its participants, connects communities and is in good health for future generations'.

Making bowls accessible: The actions include:

- 'Developing and marketing new, introductory forms of the game to service identified target markets of new bowlers'.
- 'Modernising our digital platforms and experiences so new bowlers can easily locate opportunities to get involved in our sport'.
- 'Working with clubs and facility owners to break down barriers and ensure every new bowler's first time is uncomplicated and compelling'.
- 'Developing and implementing a Diversity and Inclusion Strategy to ensure our sport is more representative of society'.
- 'Building new partnerships with like-minded organisations to engage groups of people from outside our sport'.

Support our communities: The actions include:

- 'Delivering and expanding our range of club services to support club management teams, increase their capability and empower them to thrive'.
- 'Working at a local and national level to arrest the decline in facilities to ensure places to play bowls are accessible, inclusive and sustainable'.

11.2.2 Neighbouring local authorities

Outdoor sports facilities strategies in neighbouring districts identify cross-boundary issues:

Maidstone Borough Council

The *'Maidstone Pitch Strategy'* (2019) identifies that 'there is sufficient spare capacity at existing bowls facilities to cater for all additional demand to 2031'.

Tunbridge Wells Borough Council

The *'Tunbridge Wells Playing Pitch strategy 2017 - 2033'* (2017) does not include an assessment of bowls needs.

Sevenoaks District Council

The *'Sevenoaks Playing Pitch Strategy'* (2018) identifies that there are seven local clubs but draws no conclusions on the adequacy of current or future provision.

Gravesham Borough Council

The *'Gravesham Playing Pitch Strategy'* (2016) identifies that 'most bowling greens have spare capacity, meaning an increase in membership could be sustained'.

Medway Council

The *'Medway Playing Pitch Strategy'* (2019) concluded that 'with membership numbers falling at many bowls clubs and with there being a relatively large amount of provision in Medway, there is enough supply of bowls facilities to meet current demand'.

11.3 Stakeholder consultation

11.3.1 Bowls England

Consultation with Bowls England highlighted the following issues:

- There are five outdoor bowls clubs in the borough. Two further clubs recently closed.
- The key issue for clubs is the recruitment of participants.
- The average age of bowls participants in Kent is 60.

11.3.2 Local bowls clubs

A questionnaire survey was circulated to all affiliated bowls clubs in Tonbridge and Malling. Four of the five clubs responded.

- Collectively, the five bowls clubs in the borough have 643 members.
- Demand for bowls locally shows a decrease over the past three years with one club reporting a decrease in members and two with static membership. No clubs have a waiting list. Tonbridge (Riverside) Bowls Club and Wrotham Bowls Club have both closed in the past two years due to declining membership and landlord eviction respectively.

11.3.3 Borough Green Bowls Club

The club commented that 'we maintain our facilities through a combination of a professional contractor and membership help'.

11.3.4 Tonbridge Bowls Club

The club commented that 'we are a non-profit making CASC and depend on members to volunteer for cleaning, decorating, bar staff, catering, green sweeping, green and grounds and organisation. We have spare capacity to accommodate an additional 50 - 200 members'.

- ‘We have four qualified coaches male and female who provide free instruction at private ‘taster’ sessions where we provide all the equipment. Families are particularly welcome as bowling is truly a sport for everyone we aim to be as inclusive as possible’.
- ‘We provide short mat bowls in our clubhouse during the winter months’.
- ‘We have beautiful surroundings and ground but can only have four rinks’.
- ‘We currently need a new roof for our clubhouse and some flooring repairs in toilets’.
- ‘Members haven't been able to bowl for over a year and we are worried that having given it up for that time they will not return. Especially as we have members over 75’.

11.3.5 Wrotham Bowls Club

The club commented that ‘sadly we lost our bowling green earlier this year after a protracted, and expensive, legal fight to try to get our landlord (The Bull Hotel) to renew our lease. The committee was anxious to get the lease renewed as the club has been established since 1985 and we had 70 full and social members who were keen not to lose this much loved local amenity’.

11.4 Bowls Green Demand

11.4.1 Introduction

This section summarises the demand for bowls in Tonbridge and Malling and includes:

- Expressed demand.
- Displaced demand.
- Latent and unmet demand.
- Future demand.

11.4.2 Expressed demand

Bowls clubs in Tonbridge and Malling, membership numbers and the outdoor greens where they play are as follows.

Club	*Green*	*No. members*
Borough Green BC	Borough Green Bowls Club	103
Ditton BC	Ditton Recreation Ground	56
Hadlow BC	Hadlow Bowls Club	107
Tonbridge BC	Tonbridge Farm Recreation Ground	294
Townsend Hook BC	Townsend Hook Bowls Club	74

11.4.3 Displaced demand

Displaced demand relates to play by teams from within the study area which takes place outside of the area, or vice versa. Based upon the results of the clubs’ survey, there is no evidence of any displaced demand for bowls.

11.4.4 Unmet demand

Unmet demand takes a number of forms:

- Clubs may have access to a facility for matches but nowhere to train or vice versa.

- Some facilities may be unavailable to the community.
- The poor quality and limited capacity of facilities and/or a lack of provision and ancillary facilities which meet a certain standard of play/league requirement.

There is no evidence of unmet demand for outdoor bowls greens in Tonbridge and Malling at present, with all clubs reporting spare capacity to accommodate additional members.

11.4.5 Latent demand

Whereas unmet demand is known to currently exist latent demand is demand that evidence suggests may be generated from the current population should they have access to more or better provision. There is no evidence of latent demand for bowls in Tonbridge and Malling at present with no clubs operating waiting lists.

11.4.6 Future demand

This has been assessed as follows:

- ***Participation rates:*** Sport England's 'Active Lives' survey has recorded adult (16+) weekly participation rates for bowls at national level since 2015:

Nov 2015-Nov 2016	*May 2016-May 2017*	*Nov 2016-Nov 2017*	*May 2017-May 2018*	*Nov 2017-Nov 2018*	*May 2018-May 2019*	*Nov 2018-Nov 2019*	*May 2019-May 2020*	*% Change*
0.8%	0.8%	0.8%	0.8%	0.7%	0.7%	0.5%	0.5%	-0.3%

- ***Population growth:*** Two scenarios are considered:

  - The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).
  - Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 or 27.7%.

11.4.7 Key findings on demand

The key findings on demand are as follows:

- There are five local clubs serving Tonbridge and Malling.
- There is no evidence of any displaced or unmet demand.
- Future demand patterns are likely to be similar to current levels, based on a balance between participation trends and population projections.

11.5 Bowls Green Supply

11.5.1 Introduction

This section summarises the detail of bowls green supply in Tonbridge and Malling. The greens included in the analysis are defined as grassed permanently laid out greens.

11.5.2 Greens with community use and used

Site	Address	Sub-area
Borough Green BC	Harrison Road, Borough Green TN15 8RZ	Tonbridge
Ditton BC	Recreation Ground, Kiln Barn Lane, Ditton, Aylesford ME20 6QR	Mallings
Hadlow BC	School Lane, Hadlow TN11 0EH	Tonbridge
Tonbridge BC	Tonbridge Farm, Darenth Avenue, Tonbridge TN10 3JF	Tonbridge
Townsend Hook BC	North Downsview, Paddlesworth Road, Snodland ME6 5DP	Mallings

11.5.3 Greens by sub-area

The number of greens by sub-area are as follows. It shows that there is a geographically equitable distribution of provision across the borough:

Sub-area	Population	No. Greens	Greens per capita
Tonbridge and surrounds	56,018	3	1: 18,673
Mallings and surrounds	76,182	2	1: 38,091
TONBRIDGE & MALLING	***132,200***	***5***	***1: 26,440***

11.5.4 Greens where use was recently discontinued

Site	Address	Sub-area	Use discontinued
Riverside (Tonbridge BC)	Avebury Avenue, Tonbridge TN9 1TG	Tonbridge	2023
Wrotham BC	Bull Lane, Wrotham TN15 7RF	Mallings	2023

11.6 Quality

11.6.1 The criteria assessed for bowls greens

The quality of bowls greens was assessed by a non-technical visual inspection during a site visit to all facilities during the playing season. The criteria that were assessed were as follows:

- ***The green:*** The quality of the grass, flatness and regulation ditches.
- ***Changing facilities:*** The capacity, condition and fitness for purpose.
- ***Disability access:*** The extent of full disabled access to the facility, including the provision of access ramps, dedicated changing, toilets and car parking.
- ***General access:*** Parking, signage and proximity to public transport.

11.6.2 The basis of the ratings

The facilities were rated on a five-point scale, where 5 equates to 'very good' (highlighted in green below), 4 to 'good' (also highlighted in green below), 3 to 'average' (highlighted in yellow below), 2 to 'poor' (highlighted in red below) and 1 to 'very poor' (also highlighted in red below).

11.6.3 Bowls greens assessment

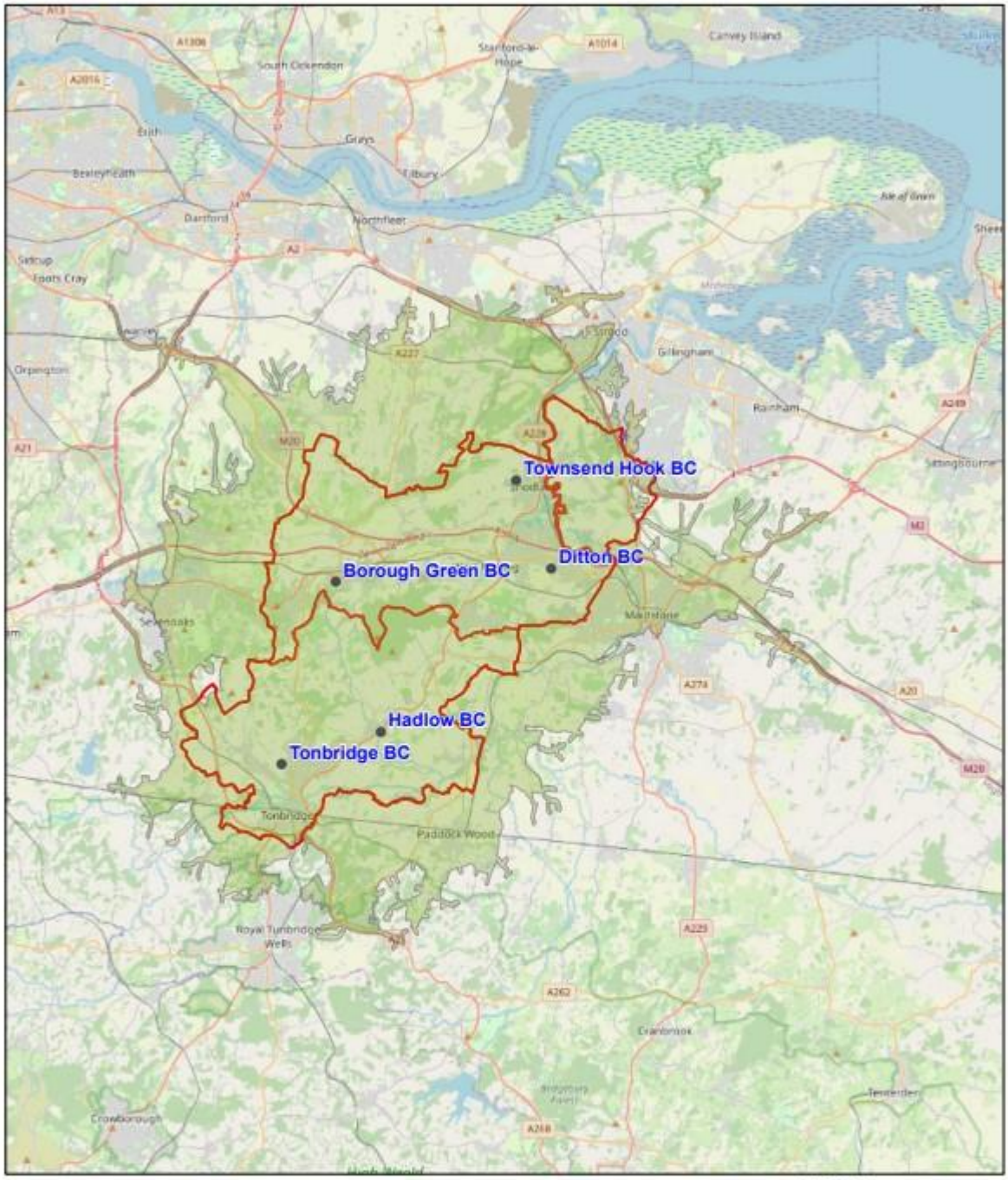
The ratings for bowls in Tonbridge and Malling are shown in the table overleaf.

Facility	Green	Changing	Disability Access	General access
Borough Green Bowls Club	5	5	3	3
Ditton Bowls Club	4	5	3	4
Hadlow Bowls Club	4	3	2	1
Tonbridge Bowls Club	5	5	4	5
Townsend Hook Bowls Club	5	5	5	5

11.7 Accessibility

Bowls England applies a 20 minute drivetime catchment to define accessibility. The map overleaf shows that the whole of Tonbridge and Malling is within 20-minutes' drivetime of a green.

Tonbridge and Malling - Outdoor Bowls 15 minutes drive



11.8 Availability

The table below identifies the basis of use of bowls greens in Tonbridge and Malling:

Club	Basis of use
Borough Green Bowls Club	Membership only
Ditton Bowls Club	Membership only
Hadlow Bowls Club	Membership only Membership £90 per annum
Tonbridge Bowls Club	Membership only Membership £75 per annum for adults and £10 per annum for juniors
Townsend Hook Bowls Club	Membership only

11.9 Key findings on supply

The key findings are as follows:

- There are five bowls greens in Tonbridge and Malling.
- The quality of greens is generally good, but disability and general access are 'poor' at Hadlow BC.
- Accessibility of greens is good, with the entire population within 20 minutes driving time of the nearest facility.
- Most greens are available to non-members for free introductory sessions.
- There is significant spare capacity at all greens.

11.10 The balance between bowls green supply and demand

Four criteria have been assessed to evaluate the balance between bowls green supply and demand in Tonbridge and Malling:

- ***Quantity:*** Are there enough greens with sufficient capacity to meet needs now and in the future?
- ***Quality:*** Are the greens fit for purpose for the users now and in the future?
- ***Accessibility:*** Are the greens in the right physical location for the users now and in the future?
- ***Availability:*** Are the greens available for those who want to use them now and in the future?

11.11 Quantity

11.11.1 Current needs

There is no evidence of a shortfall in current provision for outdoor bowls, based upon the following evaluation:

- ***Used capacity:*** Local clubs have indicated that there is significant spare capacity.
- ***Satisfied demand:*** There is no evidence of unmet demand in the borough.
- ***Changes in supply:*** There are no known current planned changes to bowls green supply.

11.11.2 Future needs

Future demand patterns are likely to be similar to current levels, based on participation trends but the higher population projections will create a requirement for 15.6% additional capacity by 2041 under the lower population projection and 27.7% additional capacity under the higher population projection. Spare capacity at the existing bowls facilities will be able to accommodate all additional future demand, based upon falling participation rates and limited population growth.

11.12 Quality

11.12.1 Current quality

The quality of greens is generally good, but disability and general access are 'poor' at Hadlow BC.

11.12.2 Future quality

All bowls facility providers will need to continue to invest in maintaining and improving their facilities, so if this process can be assisted with funding from developer contributions in the future, it seems reasonable to assume that local provision will continue to be upgraded regularly.

11.13 Accessibility

11.13.1 Current accessibility

All of the population is within 20-minutes' drive of the nearest bowls green.

11.13.2 Future accessibility

It is reasonable to assume that the current geographical coverage will be maintained in the future.

11.14 Availability

11.14.1 Current availability

Most greens are available to non-members for free introductory sessions.

11.14.2 Future availability

It is reasonable to assume that similar access arrangements will be offered in the future.

11.15 The options for securing bowls green capacity

The options for securing existing bowls green capacity to meet current and future needs are as follows:

11.15.1 Protect

Protecting existing bowls greens through the Local Plan will be key both to securing local provision by ensuring that planning policy supports the retention of existing facilities, unless

the loss of a facility would involve its replacement with a facility of at least the equivalent size, quality and accessibility.

11.15.2 Provide

There is no need to provide additional facilities based on current and projected future demand.

11.15.3 Enhance

Enhancing existing bowls green capacity by:

- Addressing the issues at the site where features are rated as 'poor'.
- Ensuring that the greens and ancillary facilities receive regular maintenance and improvements.

11.16 Action Plan

11.16.1 Introduction

The tables below set out the action plan for bowls greens to guide the implementation of the strategy. The capital cost estimates are based upon Sport England's *'Facility Costs - Second Quarter of 2023'* (2023).

11.16.2 Key strategic actions

Issues	*Action*	*Lead*	*Partners*	*Resources*	*Priority*
Protection of existing bowls greens	Include a policy in the Local Plan to protect all existing bowls greens.	TMBC Planning Policy	Sport England/ Active Kent and Medway	-	High

11.16.3 Site-specific actions

Site	*Issues*	*Action*	*Lead*	*Partners*	*Resources*	*Priority*
Borough Green Bowls Club	No current issues	No action	-	-	-	-
Ditton Bowls Club	No current issues	No action	-	-	-	-
Hadlow Bowls Club	Poor disability access	Provide hard path from the access point	Hadlow BC	-	£1,500	Medium
Tonbridge Bowls Club	No current issues	No action	-	-	-	-
Townsend Hook Bowls Club	No current issues	No action	-	-	-	-

12 NETBALL COURT NEEDS

12.1 Organisational context

- ***England Netball:*** England Netball is the governing body of the sport and supports the development of the game in Tonbridge and Malling.
- ***Netball leagues:*** There are three netball leagues of various sizes in the borough, based in Aylesford, Kings Hill and Tonbridge.

12.2 Strategic context

12.2.1 England Netball's strategy

England Netball's *'Adventure Strategy 2021 - 2031'* (2021) contains the following relevant material:

A Game for Life: This 'destination' has the following targets:

- A 50% increase in the number of women playing netball across all life stages.
- A year-on-year increase in the diversity of the netball playing population, with an ambition to reflect the diversity of the nation.
- A countrywide accessible offer for men and boys.
- 90% of all schools delivering a quality netball experience.
- A clear and connected offer of choice for every community, with world class experiences in clubs and leagues at the heart of community netball.
- A place to play within easy travel of every household.

12.2.2 Neighbouring local authorities

Outdoor sports facilities strategies in neighbouring districts identify cross-boundary issues:

Maidstone Borough Council

The *'Maidstone Playing Pitch Strategy'* (2019) does not include an assessment of netball needs.

Tunbridge Wells Borough Council

The *'Tunbridge Wells Playing Pitch strategy 2017 - 2033'* (2017) does not include an assessment of netball needs.

Sevenoaks District Council

The *'Sevenoaks Playing Pitch Strategy'* (2018) does not include an assessment of netball needs.

Gravesham Borough Council:

The *'Gravesham Playing Pitch Strategy'* (2016 does not include an assessment of netball needs.

Medway Council
The *'Medway Playing Pitch Strategy'* (2019) does not include an assessment of netball needs.

12.3 Stakeholder consultation

12.3.1 England Netball

Consultation with England Netball highlighted the following issues:

- The sport is buoyant in Tonbridge and Malling.
- There are three netball leagues of various sizes in the borough, based in Aylesford, Kings Hill and Tonbridge.
- The five court facility at Aylesford Bulls Rugby Club is the only purpose-built netball centre in Kent.
- There has been a big rise in junior participation over the last five years. There was a surge in growth after the 2018 Commonwealth Games.
- Club netball has seen a big growth in the 25-40 age group.
- Walking netball (over 60s) is also proving to be popular.
- England Netball is keen to encourage the provision of netball court markings on all Multi-use Games Areas (MUGAs), to expand opportunities to play the game.

12.3.2 Malling and Maidstone Netball League

Consultation with the Mallings and Maidstone Netball League identified the following:

- 'The Malling and Maidstone Netball League is a local netball league that was first established in 1967, when it was known as the 'Maidstone and District Netball League' and based at the Y Centre in Loose'.
- 'In 2002, we moved to our new home at Aylesford Bulls Rugby Football Club and with the help of lottery funding from Sport England, we built five outdoor courts with floodlights - making us the only purpose-built netball centre in Kent!'
- 'We currently have 85 teams, spanning eight divisions with 700+ members playing four nights a week in our summer and winter leagues. We attract all levels of netballers; from the first-time player to the more seasoned one'.
- 'In addition to our adult league, we run youth netball training on a Sunday morning for young people in Year 5 to Year 11. Players able to play adult level netball are filtered into the adult league teams where possible. We also have a mentoring team available to anyone who would like to take up umpiring, or qualified umpires who would like support in achieving the next level of their umpiring qualification'.
- 'As a League, we don't run coach led training sessions as teams/clubs manage their own training. However, we do run our own initiatives at intervals throughout the year, with our most popular being the Spring/Summer Boot Camps that take place during the breaks between the Winter and Summer League's (April and August), which take place on a Wednesday evening for four consecutive weeks'.
- 'The League lets the courts free of charge for schools to meet for matches/tournaments and use the facilities. Oher youth netball is also welcomed without charge for example county trials and Regional U14 matches'.
- 'We have planning permission for the re-development of the courts, as we're at capacity and had to turn teams away this year from the league for the first time. This will provide a total of 6 courts, 3 indoor and 3 outdoor'.
- 'This was the first year we had to turn teams away. When the league moved to MMNL in 2002 we had 50 teams, we now have over 80. Our recent planning permission to take the facility to 6 courts gives the League the ability to expand and retain a fit for purpose facility within the Borough. Walking and Youth netball which can be severely impacted

by weather, by expanding to include an additional court and an indoor facility it also means these sessions can be provided more frequently'.

- 'The ongoing wet weather severely impacts the running of the league, we re-schedule on average 40 games a season due to weather. We currently share toilet facilities with the rugby club, the drainage of these is often at capacity. We have no changing facilities of our own. These aspects have been addressed in our planning consent'.
- 'The expansion of the courts to 3 outdoor and 3 indoor will allow the league to efficiently run in all weathers and provide opportunities to expand the Membership and all types of netball offered (e.g. youth netball, Bee Netball, Walking Netball as well as our long-standing competitive league). We would be looking for our site, with planning consent to feature as a formal allocation within the Council SFS and Local Plan in order that this may be supported through the allocation of S106 funds. A further increase in car parking could be investigated, alongside the Parish Council at the adjacent Ferryfields Open Space. Equally the indoor courts do also provide potential for multi-sport use, such as indoor cricket net facility when not being used by the League'. The overall layout will be as follows:

12.3.3 Tonbridge Netball League

Consultation with the Tonbridge Netball League identified the following:

- Tonbridge Netball League is based at the sports hall and outdoor courts of Weald of Kent Grammar School. It operates a winter and a summer league. Bookings are frequently cancelled due to school usage or the absence of an available caretaker.
- The League currently comprises four divisions involving a total of 22 teams and around 200 players.
- There is a need for two additional outdoor sports lit netball courts in Tonbridge and the redundant bowls green at the Racecourse Sports Ground could be a possible location. These could be marked as multi-use games areas for other sports in addition.
- The small-sided artificial turf pitch at Tonbridge Farm Recreation Ground has been periodically used for netball, but the surface is unsuitable for anything other than recreational level play.

12.3.4 Kings Hill Netball League

The Kings Hill Netball League is non-affiliated and operates a winter and summer social league of four teams on Monday evenings on the two courts at Kings Hill Sports Park.

12.4 Netball Court Demand

12.4.1 Introduction

This section summarises the demand for netball in Tonbridge and Malling and includes:

- Expressed demand.
- Displaced demand.
- Latent and unmet demand.
- Future demand.

12.4.2 Expressed demand

Netball leagues in Tonbridge and Malling, their affiliated teams and the courts where they play are as follows.

League	Courts	Teams
Kings Hill Netball League	Kings Hill Sports Park	4
Mallings and Maidstone Netball League	Aylesford Bulls Rugby Club	85
Tonbridge Netball League	Weald of Kent Grammar School	22

12.4.3 Displaced demand

Displaced demand relates to play by teams from within the study area which takes place outside of the area, or vice versa. The Malling and Maidstone Netball League imports some demand from neighbouring Maidstone and Medway.

12.4.4 Unmet demand

Unmet demand takes a number of forms:

- Clubs may have access to a facility for matches but nowhere to train or vice versa.
- Some facilities may be unavailable to the community.
- The poor quality and limited capacity of facilities and/or a lack of provision and ancillary facilities which meet a certain standard of play/league requirement.
- The Malling and Maidstone Netball League has been unable to accommodate all the expressed demand from potential teams in the 2023 season due to a lack of current court capacity and the Tonbridge Netball League unable to book facilities on a consistent basis

12.4.5 Latent demand

Whereas unmet demand is known to currently exist latent demand is demand that evidence suggests may be generated from the current population should they have access to more or better provision. There is some latent demand for netball in Tonbridge and Malling at present.

12.4.6 Future demand

This has been assessed as follows:

- ***Participation rates:*** Sport England's 'Active Lives' survey has recorded adult (16+) weekly participation rates for netball at national level since 2015. This shows a slight fall in the period, although local affiliation numbers rose by 40% between 2019 and 2022:

Nov 2015-Nov 2016	May 2016-May 2017	Nov 2016-Nov 2017	May 2017-May 2018	Nov 2017-Nov 2018	May 2018-May 2019	Nov 2018-Nov 2019	May 2019-May 2020	% Change
0.7%	0.6%	0.6%	0.6%	0.6%	0.7%	0.7%	0.6%	-0.1%

- ***Population growth:*** Two scenarios are considered:
  - The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).
  - Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 or 27.7%.

12.4.7 Key findings on demand

The key findings on demand are as follows:

- There are three netball leagues serving Tonbridge and Malling.
- There is clear evidence of unmet demand for outdoor netball courts in Tonbridge and Malling at present, with Malling and Maidstone Netball League turning teams away and the Tonbridge Netball League unable to book facilities on a consistent basis.
- Future demand is likely to increase based on participation trends and population growth.
- Contrary to the 'Active Lives' survey trends, all local leagues have experienced increased memberships in the past three years.

12.5 Netball Court Supply

12.5.1 Introduction

This section summarises the detail of netball court supply in Tonbridge and Malling. The courts included in the analysis are defined as hard courts permanently laid out with regulation markings for netball. The categories assessed are as follows:

12.5.2 Courts with community use and used

Site	*Address*	*Sports lit courts*	*Sub-area*
Aylesford Bulls RFC	Hall Road, Aylesford ME20 7DS	5	Mallings
Kings Hill Sports Park	Beacon Avenue, Kings Hill ME19 4QP	2	Mallings
Weald of Kent Grammar School	Tudeley Lane, Tonbridge TN9 2JP	4	Tonbridge
TOTAL	**-**	***11***	Reigate

12.5.3 Courts by sub-area

Courts with community use and used by sub-area are as follows. Provision is poorest in the Banstead/Tadworth sub-area:

Sub-area	*Population*	*No. Courts*	*Courts per capita*
Tonbridge and surrounds	56,018	4	1: 14,005
Mallings and surrounds	76,182	7	1: 10,883
TONBRIDGE & MALLING	***132,200***	***11***	***1: 12,018***

12.5.4 Courts with no community use

The following courts are not available for community use. All are non-sports lit:

Site	*Address*	*Courts*
Aberdour School	Brighton Road, Tadworth KT20 6AJ	3
Aylesford School	Teapot Lane, Aylesford ME20 7JU	5
Bishop Chavasse Primary School	Baker Lane, Tonbridge TN11 0FB	1
Hillview School for Girls	Brionne Gardens, Tonbridge TN9 2HE	4
Hugh Christie School	White Cottage, Road, Tonbridge TN10 4PU	2
Leigh Academy	Brook Street, Tonbridge TN9 2PH	4
Malling School	Beech Road, West Malling ME19 6DH	2
Platt Primary School	Maidstone Road, Platt TN15 8JY	1

Site	Address	Courts
Plaxtol Primary School	School Lane, Plaxtol TN15 0QD	1
St. Mark's Primary School	Eccles Row, Eccles ME20 7HS	1
St. Peter's Primary School	Mount Pleasant, Aylesford ME20 7BE	1
Stocks Green Primary School	Leigh Road, Hildenborough TN11 9AE	1
Sussex Road Primary School	Sussex Road, Tonbridge TN9 2TP	1
Tonbridge Grammar School	Deakin Leas, Tonbridge TN9 2JR	2
Trottiscliffe Primary School	Church Lane, Trottiscliffe ME19 5EB	1
Tunbury Primary School	Tunbury Avenue, Bluebell Hill ME5 9HY	2
Valley Invicta Primary School	Teapot Lane, Aylesford ME20 7JU	2
Valley Invicta Primary School	Pollyfield Close, Snodland ME6 5GR	1
Valley Invicta Primary School	Warwick Way, Kings Hill ME19 4AL	1
Valley Invicta Primary School	Derby Drive, Leybourne ME19 5FJ	2
Wateringbury Primary School	Bow Road, Wateringbury ME18 5EA	2
West Malling Primary School	Norman Road, West Malling ME19 6RL	1
Woodlands Primary School	Higham School Road, Tonbridge TN10 4BB	1
Wouldham All Saints Primary Sch.	Worrall Drive, Wouldham ME1 3GE	1
TOTAL	***-***	***40***

12.6 Quality

12.6.1 The criteria assessed for netball courts

The quality of outdoor netball courts was assessed by a non-technical visual inspection during a site visit to all facilities. The criteria that were assessed were as follows:

- ***The court:*** Court surface, line markings and fitness for purpose.
- ***Fencing:*** Condition and appearance.
- ***Disability access:*** Provision for disabled access to the courts.
- ***General access:*** Parking, signage and proximity to public transport.
- ***Lighting:*** The quality, illumination levels and evenness of floodlights.

12.6.2 The basis of the ratings

The facilities were rated on a five-point scale, where 5 equates to 'very good', 4 to 'good', 3 to 'average', 2 to 'poor' and 1 to 'very poor'.

12.6.3 Netball court assessment

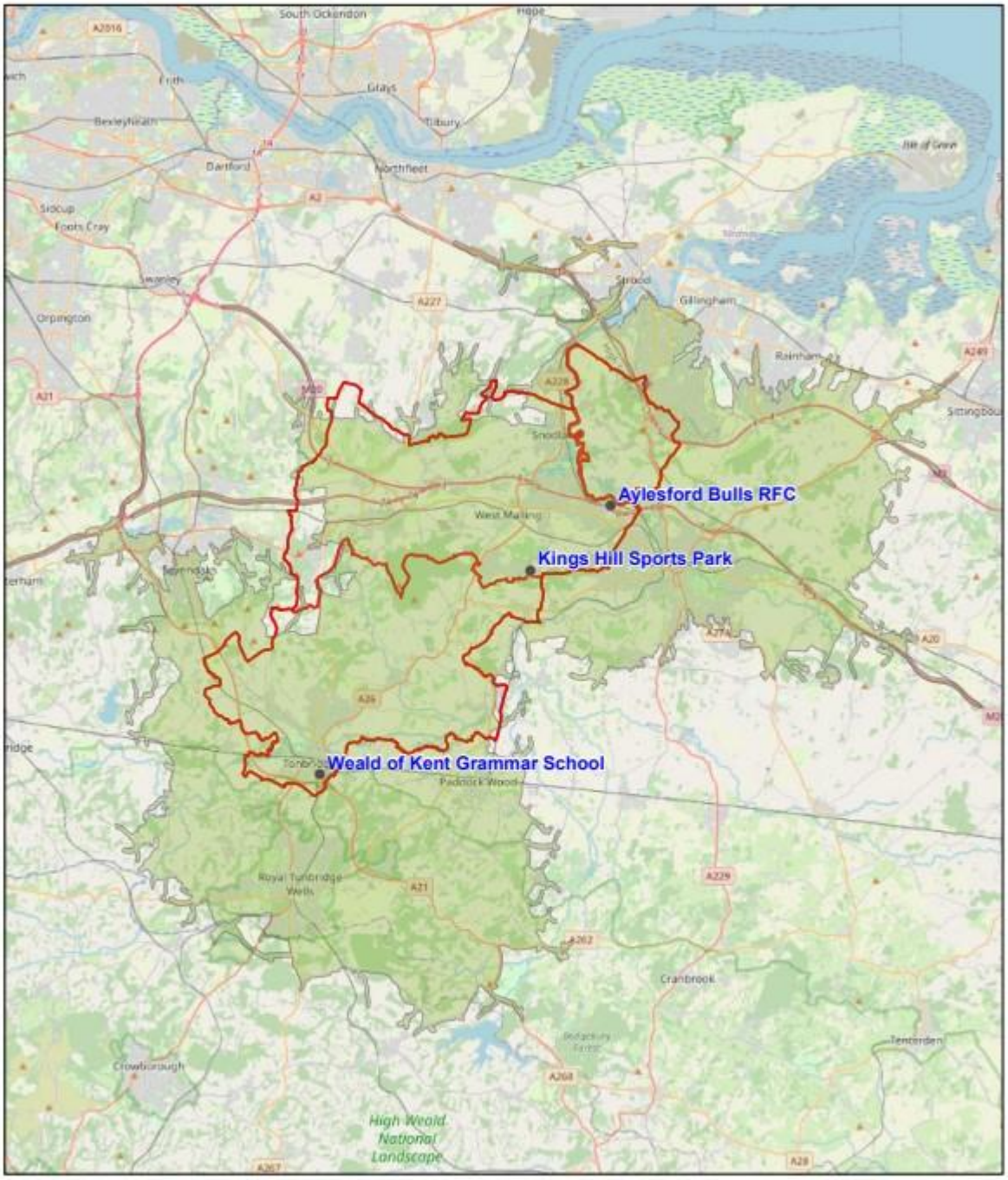
The ratings for netball courts in Tonbridge and Malling are shown in the table below.

Facility	Court	Fencing	Disability Access	General access	Lighting
Aylesford Bulls RFC	5	5	5	5	5
Kings Hill Sports Park	5	5	5	5	5
Weald of Kent Grammar School	5	5	5	5	5

12.7 Accessibility

England Netball applies a 20 minute drivetime catchment to define accessibility. The map overleaf shows that the whole of Tonbridge and Malling is within 20-minutes' drivetime of a court.

Tonbridge and Malling - Outdoor Netball Courts 15 minutes drive



2/11/2024

1:400,000

0 2 4 8 mi

0 3.25 6.5 13 km

Outdoor Netball

15.0 Minutes

Sub Areas - Tonbridge Surrounds and Malling Surrounds

Tonbridge and Malling District Boundary

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12.8 Availability

The table below identifies the basis of use of outdoor netball courts in Tonbridge and Malling:

Club	Basis of use
Aylesford Bulls RFC	League members court hire £20 per hour Non-league members court hire £35 per hour Schools and juniors free
Kings Hill Sports Park	Court hire £25 per hour
Weald of Kent Grammar School	Block-booked courts £25 per hour

12.9 Ownership, management and security of access

The ownership, management and security of community access of outdoor netball court sites is detailed below. Security of access refers to the extent to which community use is protected (through public ownership, community use agreements etc.), rather than the security of tenure of specific club users.

Site	Ownership	Management	Access
Aylesford Bulls RFC	Aylesford Parish Council	Aylesford Bulls RFC	Secured
Kings Hill Sports Park	Kings Hill Parish Council	TMActive	Secured
Weald of Kent Grammar School	Weald of Kent Grammar School	Weald of Kent Grammar School	Unsecured

12.10 Key findings on supply

The key findings are as follows:

- There are 11 netball courts with community access in Tonbridge and Malling, all of which are sports lit.
- The quality of all courts is 'good'.
- Accessibility of courts is good, with the entire population within 20 minutes driving time of the nearest facility.
- Seven courts have secured community use.

12.11 The balance between netball court supply and demand

Four criteria have been assessed to evaluate the balance between netball court supply and demand in Tonbridge and Malling:

- ***Quantity:*** Are there enough courts with sufficient capacity to meet needs now and in the future?
- ***Quality:*** Are the courts fit for purpose for the users now and in the future?
- ***Accessibility:*** Are the courts in the right physical location for the users now and in the future?
- ***Availability:*** Are the courts available for those who want to use them now and in the future?

12.12 Quantity

12.12.1 Current needs

There is clear evidence of unmet demand for outdoor netball courts in Tonbridge and Malling at present, with the Malling and Maidstone League planning an expanded facility at Aylesford Bulls RFC to cater for the unmet needs and demand for extra outdoor courts in Tonbridge.

12.12.2 Future needs

Future demand patterns are likely to be similar to current levels, based on participation trends but the higher population projections will create a requirement for 15.6% additional capacity by 2041 under the lower population projections and 27.7% under the higher projections. This is equivalent to two extra courts for the lower population projection and three extra courts under the higher population projection.

12.13 Quality

12.13.1 Current quality

The quality of netball courts is currently 'good' in all cases.

12.13.2 Future quality

All netball court providers will need to continue to invest in maintaining and improving their facilities, so if this process can be assisted with funding from developer contributions in the future, it seems reasonable to assume that local provision will continue to be upgraded regularly.

12.14 Accessibility

12.14.1 Current accessibility

All of the population is within 20-minutes' drive of the nearest netball court.

12.14.2 Future accessibility

It is reasonable to assume that the current geographical coverage will be maintained in the future.

12.15 Availability

12.15.1 Current availability

Seven courts are on sites where there is secured community access, but four are not.

12.15.2 Future availability

To secure netball court availability in the future, a formal Community Use Agreement should be pursued with Weald of Kent Grammar School.

12.16 The options for securing netball court capacity

The options for securing existing netball court capacity to meet current and future needs are as follows:

12.16.1 Protect

Protecting existing netball courts through the Local Plan will be key both to securing local provision by ensuring that planning policy supports the retention of existing facilities, unless the loss of a facility would involve its replacement with a facility of at least the equivalent size, quality and accessibility.

12.16.2 Provide

There is a current need to provide one additional court as part of the proposed facilities development project at Aylesford Bulls RFC, two further additional courts by 2041 to meet demand arising from the lower population growth projections and three additional courts to meet demand from higher population growth projections. There is a case for making locally accessible provision in any major new housing developments.

12.16.3 Enhance

Enhancing existing netball court capacity by delivering indoor courts at Aylesford Bulls RFC.

12.17 Action Plan

12.17.1 Introduction

The tables below set out the action plan for netball courts to guide the implementation of the strategy. The capital cost estimates are based upon Sport England's *'Facility Costs - Second Quarter of 2023'* (2023).

12.17.2 Key strategic actions

Issues	*Action*	*Lead*	*Partners*	*Resources*	*Priority*
Protection of existing netball courts.	Consider including a policy in the Local Plan to protect all existing netball courts.	TMBC Planning Policy	Sport England/ Active Kent and Medway	-	High
Funding for future netball court needs.	Ensure that S106 contributions are collected from developers.	TMBC Planning Development Management	Sport England/ Active Kent and Medway	-	High
Additional court provision in Tonbridge.	Examine the feasibility of providing two sports lit netball courts at either Tonbridge Racecourse or Tonbridge Farm.	TMBC	England Netball	£5,000 for feasibility study.	High
Sports lighting energy efficiency	Replace old sports lighting with LED heads and upgrade switching gear	Site owners	LTA	£30,000 per site	Medium

12.17.3 Site-specific actions

Site	Issues	Action	Lead	Partners	Resources	Priority
Aylesford Bulls RFC	Need for additional court capacity	Develop the proposals for additional provision including indoor courts	M&MNL	TMBC England Netball	TBC	High
Kings Hill Sports Park	No current issues	No action	-	-	-	-
Weald of Kent Grammar School	Unsecured community access	Negotiate a Community Use Agreement	TMBC	Weald of Kent Grammar School	-	Medium

13 ATHLETICS TRACK NEEDS

13.1 Organisational context

- ***England Athletics:*** England Athletics is the governing body of the sport and supports the development of the sport in Tonbridge and Malling.
- ***Affiliated Clubs:*** There are three athletics clubs in Tonbridge and Malling.

13.2 Strategic context

13.2.1 Athletics facilities strategy

England Athletics' *'Facilities Strategy 2018 - 2025'* (2018) contains the following material of relevance:

Strategic ambition: The strategic ambition is 'to create an innovative and inspiring network of sustainable athletics facilities, with the capacity to meet current and future demand across England'.

- ***The importance of tracks:*** The strategy states that 'facilities are crucial to participating in track and field athletics for recreation, training and competition. Quality of design, social amenities, facility condition and layout have a substantial impact on athlete enjoyment, club capacity to operate effectively, venue flexibility to accommodate a broad range of athletics related uses and multi-sport provision. Ultimately, all these factors affect venue (and club) capacity to function on an effective business-like footing'.
- ***Multi-sport hubs:*** 'Proactive management and sustainable models of operation are most commonly found at venues that are part of a wider sports complex. This tends to result in more creative uses of athletics facilities and has the benefit that changing provision, track supervision and maintenance are part of a wider operation with consequent economies of scale'.
- ***Clubhouses:*** 'Clubhouses should be attractive and function well in order to attract new members and retain existing ones. Clean well designed changing rooms and toilets, a multifunctional room in which people can gather for meetings or to socialise, and convenient car parking, all help to sustain participation not just for athletes, but also volunteers. For example, having a space for volunteers to relax and take a break is crucial to making them feel valued. All new athletics tracks should be provided with access to suitable clubhouse facilities including social space, changing rooms and toilets and, where possible'.
- ***Running facilities:*** 'The number of people running in England has grown by 67% in the last 10 years. Current participation is dominated by those that run alone, with 80% of runners doing some form of solo running and half of those only running alone. However, studies have shown that regular contact with others increases participation and reduces dropout rates, suggesting that the majority of runners are extrinsically motivated and need motivation from peers, expert support and the camaraderie of like-minded people. It is therefore important that any discussion about facilities considers the needs of this group too. Running doesn't require a specific facility, with the majority of participants making use of non-specialist (and largely free of charge) existing facilities and infrastructure, including roads, rights of way, parks and open spaces. Wherever possible, the needs of runners for well lit, suitably surfaced, safe, running routes are built into the design of new infrastructure development projects for the benefit of all residents' health and wellbeing'.

13.2.2 Neighbouring local authorities

Outdoor sports facilities strategies in neighbouring districts identify cross-boundary issues:

Maidstone Borough Council

The *'Maidstone Sports Facilities Strategy'* (2019) identifies that 'there is one 8-lane synthetic athletics track in Maidstone. There is sufficient spare capacity at the existing track to cater for all additional demand to 2031'.

Tunbridge Wells Borough Council

The *'Tunbridge Wells Playing Pitch strategy 2017 - 2033'* (2017) does not include an assessment of athletics facilities needs.

Sevenoaks District Council

The *'Sevenoaks Playing Pitch Strategy'* (2018) identifies that 'there is one synthetic athletics facility at the Sennocke Centre, Sevenoaks School and this meets all current and future needs'.

Gravesham Borough Council

The *'Gravesham Playing Pitch Strategy'* (2016) identifies that 'there are no athletic tracks situated in the area. No actions required for athletics provision in the area'.

Medway Council: The *'Medway Sports Facilities Strategy'* (2017) identifies that:

- 'The Medway Park athletics track provides a modern facility that is easily accessible and can therefore be used to encourage increased participation rates. It is the focus of athletics participation and events in the area, county and wider region. It should be maintained in good condition. The track at Medway Park meets the needs for dedicated athletics facilities and there is no evidence for increased provision in the area'.
- 'Consideration should be given to closure of the athletics track at Deangate Ridge Golf and Sports Complex. The facility is in poor condition and is not well utilised, mainly due to its remote location and the lack of any regular club use, as well as the increasing focus on Medway Park as the hub for athletics in Medway'.

13.3 Stakeholder consultation

13.3.1 England Athletics

Consultation with England Athletics highlighted the following issues:

England Athletics Facilities Priorities: These are as follows:

- 'To ensure that the allocation of resources to new and existing track and field facilities is prioritised to those that have the greatest potential to impact positively on general participation, club membership growth and retention, and improved personal performance'. To support this priority England Athletics will:
    - Encourage all tracks to seek accreditation through 'TrackMark'.

- ‘Help venues to identify the level in the Hierarchy of Facilities that is most appropriate for them and support clubs and operators seeking to raise funding to maintain facilities at that level’.
- Prioritise new track and field facilities within multi-sport hubs.
- Seek to be actively involved in the development of local planning policies wherever possible.
- Support new 200m indoor tracks and indoor athletics training facilities where there is a proven demand and a clear geographical gap in supply.

- ‘To actively encourage athletics and running facilities to be used to their fullest possible extent by the sport and by all sections of the community in order to maximise viability’. To support this priority England Athletics will:

  - Support athletics clubs in discussions with facility operators and local authorities over the use of the track infield for other pitch sports and collate examples of good practice and design guidance.
  - Support clubs and groups to ensure the facilities they use for athletics activity are accessible to all.
  - Help clubs to develop a strong partnership with facility owners/operators and will share examples of good practice.
  - Provide advice and guidance to clubs actively pursuing an asset transfer.
  - Help athletics and running clubs to become more professional and sustainable in how they operate.
  - Encourage new partnerships between athletics clubs and schools that have available indoor facilities.

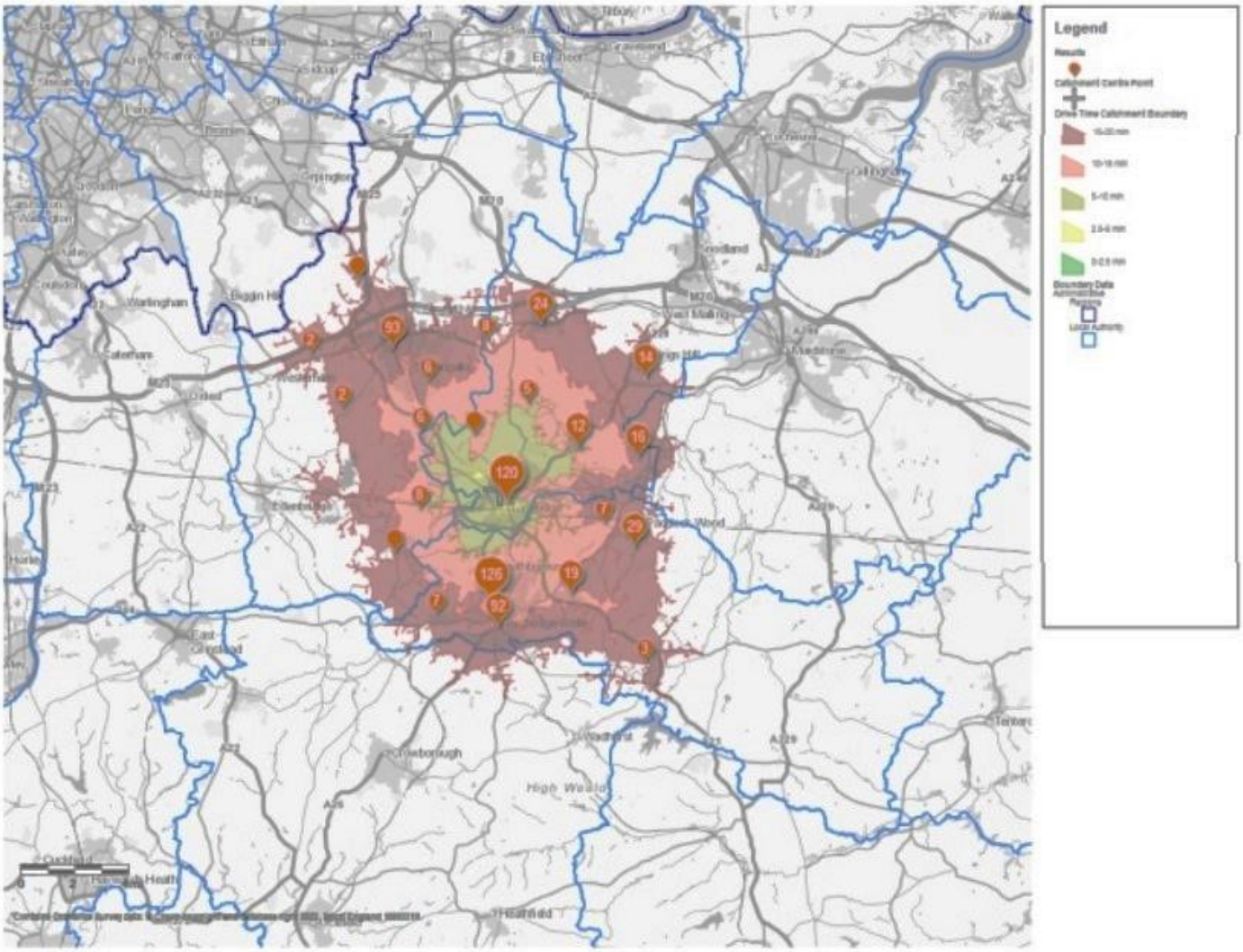
- ‘To encourage innovative approaches to the location and design of facilities for individual components of the sport in order to increase reach and create sustainability and viability’. To support this priority England Athletics will:

  - Expect all new and refurbished floodlight schemes to deliver a minimum of 100lux across the whole of the track and the infield.
  - Support clubs in exploring options for improved environmental sustainability and will share examples of good practice.
  - Support the development of MiniTracks/Compact athletics facilities where there is a viable business case.
  - Consider supporting facility innovations involving non-standard track shapes, designs and uses providing they are backed by a sound business case.
  - Continue to lobby bodies with an influence over urban design, to ensure that the needs of runners are considered alongside those of cyclists and pedestrians.
  - Continue to lobby for the free use of public parks and open spaces by runners and voluntary running groups.
  - Assist road running clubs that are looking for somewhere to meet, by introducing them to sports clubs in their area that have suitable facilities.

Facilities supply in Tonbridge and Malling: The following issues were identified:

- There is one outdoor 400m synthetic track in Tonbridge and Malling at Tonbridge School.
- ‘The Sport England Area Access report highlights that the 400m track and field facility art Tonbridge School and 400m facilities in neighbouring authorities meet the demands of track and field athletics in the area’.

Catchment: The 30-minute drivetime catchment of the track is shown in the map below:



Conclusions: England Athletics concludes that:

- 'The standard of the Tonbridge track is good and the venue has achieved 'TrackMark' accreditation. The track surface is likely to require a respray in 2027 and an appropriate sinking fund should be set aside'.
- 'The priority is to protect and maintain the 400m track and field facility at Tonbridge School and explore the opportunity to install community focused recreational ActiveTrack(s) in the local authority area - typically as part of new housing developments'.
- 'Consider ActiveTrack (walk/jog/run/cycle loops) in parks and open spaces or as part of future housing developments. A good location would be West Malling as this would service the north of the local authority area which would include the local club, Larkfield Athletics Club'.

13.3.2 Tonbridge Athletics Club

Tonbridge AC is an all-abilities club, based at the track at Tonbridge School. The club has almost 700 members from age six up to adult veterans. It trains at the Tonbridge School track on Monday, Tuesday, Wednesday and Thursday evenings with matches at weekends during the summer season. The club has teams in the National League, Southern Athletics League,

UK Youth Development League, Kent Young Athletes League and the Southern Counties Veteran's League'.

13.3.3 Larkfield Athletics Club

The club is an over-18 club based at Larkfield Leisure Centre where runners meet for 'LarkRun' on Tuesday evenings. Fully coached speed sessions are held at the sports lit running track in Sutton Valence, on Wednesday evenings.

13.3.4 West Kent Athletics Club

West Kent Athletics Club is non-geographical and operates all across Kent, including fortnightly session at the Tonbridge track. It offers hourly training sessions as a pay-as-you-go service, to benefit those who wish to train, but cannot commit to a membership, or are on waiting lists for memberships at other athletics clubs.

13.4 Athletics Track Demand

13.4.1 Introduction

This section summarises the demand for athletics in Tonbridge and Malling and includes:

- Expressed demand.
- Displaced demand.
- Latent and unmet demand.
- Future demand.

13.4.2 Expressed demand

Local club membership is currently as follows:

Club	*Members*
Tonbridge Athletics Club	670
Larkfield Athletic Club	89
West Kent Athletics Club*	-
TOTAL	***759***

* Non-membership organisation - individual athletes sign up for sessions.

Parkruns: Parkruns are organised on a weekly basis throughout the year, to allow all runners (whether or not they are members of affiliated clubs) to run in 5k timed races. Parkruns in Tonbridge and Malling are as follows:

Parkrun	*Location*	*Average participants*
Malling	Leybourne Lakes Country Park	208
Tonbridge	Castle Road, Tonbridge	416

13.4.3 Displaced demand

Displaced demand relates to activity from within the study area which takes place outside of the area, or vice versa. There is some evidence of exported demand, with Larkfield AC hiring the track in Sutton Vallance (in Maidstone Borough).

13.4.4 Unmet demand

Unmet demand takes a number of forms:

- Teams may have access to a facility for competitions but nowhere to train or vice versa.
- Some facilities may be unavailable to the community.
- The poor quality and limited capacity of facilities and/or a lack of provision and ancillary facilities which meet a certain standard of play/league requirement.

England Athletics has not identified unmet demand for athletics facilities in Tonbridge and Malling, although it did suggest the provision of an 'ActiveTrack' in Malling 'as this would service the north of the local authority area which would include the local club, Larkfield Athletics Club'.

13.4.5 Latent demand

Latent demand is demand that evidence suggests may be generated from the current population if they had access to more or better provision. There is no evidence of any latent demand for athletics and running in Tonbridge and Malling.

13.4.6 Future demand

This has been assessed as follows:

- ***National track and field participation rates:*** One factor in considering future sports participation rates is to track historical trends, as a guide to possible future developments. Sport England's 'Active Lives' survey showed statistically significant reductions in track and field participation nationally from 0.6% of the adult population in 2016 to 0.5 (equivalent to 211,600 people) in 2018. However, this excludes under 16s, many of whom experience the sport in some form through PE programmes at school.
- ***National running participation rates:*** The Active Lives' survey also showed reductions in track and running participation nationally from 6.9 million adults in 2016 to 6.5 million in 2021.
- ***Population growth:*** Two scenarios are considered:
    - The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).
    - Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 (or 27.7%).

13.4.7 Key findings on demand

The key findings on demand are as follows:

- There are three athletics and running clubs in Tonbridge and Malling.
- Two weekly Parkrun events provide additional running opportunities for casual participants.
- Some demand is displaced with Larkfield AC hiring the track in Sutton Vallance (in Maidstone Borough).

- Future demand patterns are likely to be similar to current levels, based on participation trends population growth will create a requirement for either 15.6% or 27.7% additional capacity by 2041.

13.5 Athletics Track Supply

This section summarises the detail of athletics facilities in and adjacent to Tonbridge and Malling.

- Athletics tracks are defined as 400m tracks with full field events provision.
- Athletics training facilities comprise either Club Training Venues or Compact Athletics Facilities, both of which are flexible in terms of the precise composition of facilities.

13.6 Quantity

Site	Address	No. lanes	Sub-area
Tonbridge School	High Street, Tonbridge TN9 1JP	6	Tonbridge

13.7 Quality

The quality of the cinder-surfaced athletics track and associated facilities at Tonbridge School was assessed as follows. The criteria were rated on a five-point scale, where 5 equates to 'very good', 4 to 'good', 3 to 'average', 2 to 'poor' and 1 to 'very poor'.

Facility	Track	Changing	Disability Access	General access
Tonbridge School	4	5	4	5

13.8 Accessibility

England Athletics applies a 30-minute drivetime catchment to define accessibility. The whole borough is within 30-minutes' drive of the Tonbridge School track.

13.9 Availability

The table below identifies the basis of use the Tonbridge School track:

Site	Basis of use
Tonbridge School	Club hire Mon - Fri 18.00 - 22.00 Sat - Sun 09.00 - 18.00

13.10 Key findings on supply

The track at Tonbridge School serves the whole of the borough, as well as several neighbouring areas. It has spare capacity to accommodate additional use if required.

13.11 The balance between athletics track supply and demand

Four criteria have been assessed to evaluate the balance between athletics track supply and demand in Tonbridge and Malling:

- ***Quantity:*** Are there enough facilities with sufficient capacity to meet needs now and in the future?
- ***Quality:*** Are the facilities fit for purpose for the users now and in the future?
- ***Accessibility:*** Are the facilities in the right physical location for the users now and in the future?
- ***Availability:*** Are the facilities available for those who want to use them now and in the future?

13.12 Quantity

13.12.1 Current needs

The track at Tonbridge School meets all needs for track and field in the borough and has spare capacity to accommodate additional demand in the future, although England Athletics has identified potential demand for an 'ActiveTrack' in the Mallings sub-area 'as this would service the north of the local authority area which would include the local club, Larkfield Athletics Club'.

13.12.2 Future needs

All future needs can be met by existing spare capacity at the Tonbridge School track..

13.13 Quality

13.13.1 Current quality

Some minor issues need to be addressed in relation to achieving 'Track Mark' accreditation from England Athletics.

13.13.2 Future quality

The existing track is 'good' quality but will need to be re-surfaced periodically to maintain quality.

13.14 Accessibility

13.14.1 Current accessibility

The track is accessible to all residents of the borough.

13.14.2 Future accessibility

The existing accessibility will remain in the future.

13.15 Availability

13.15.1 Current availability

The user charges areas are set at reasonable rates.

13.15.2 Future availability

It is reasonable to assume that similar access arrangements will be offered in the future.

13.16 The options for securing additional athletics facilities capacity

The options for securing existing athletics facilities capacity to meet current and future needs are as follows:

13.16.1 Protect

Protecting existing athletics facilities through the Local Plan will be key to securing local provision by ensuring that planning policy supports the retention of existing facilities, unless the loss of a facility would involve its replacement with a facility of at least the equivalent size, quality and accessibility.

13.16.2 Provide

England Athletics has identified potential demand for an 'ActiveTrack' in the Malling sub-area. The feasibility of this should be examined further.

13.16.3 Enhance

The Tonbridge School Track should complete the requirements for achieving 'TrackMark' status.

13.17 Action Plan

The table below sets out the action plan for athletics facilities to guide the implementation of the strategy. The capital cost estimates are based upon Sport England's *'Facility Costs - Second Quarter of 2023'* (2023).

Issues	*Action*	*Lead*	*Partners*	*Resources*	*Priority*
Protection of the existing athletics track.	Consider including a policy in the Local Plan to protect all athletics facilities.	TMBC Planning Policy	Sport England/ Active Kent and Medway	-	High
'ActiveTrack' in the Mallings sub-area	Commission a needs assessment to confirm the feasibility.	TMBC	-	£5,000 for the study. £150,000 for the track if required	Medium

14 INFORMAL OUTDOOR FACILITIES NEEDS

14.1 The facilities included

The informal outdoor facilities included are as follows:

- Multi use games areas (MUGAs)
- Skate and BMX parks
- Outdoor fitness equipment

14.2 Strategic context

14.2.1 Basketball England

Basketball England designated 2022 'The Year of 3v3 Basketball'. 3x3 is simple and flexible enough to be played almost anywhere by anybody - and is the number one urban team sport in the world. All that is required is a hoop, a half-court and six players - it is basketball in one of its most basic forms. The game featured in the 2022 Commonwealth Games in Birmingham. MUGAs provide an excellent facility for accommodating both 3v3 and 5v5 basketball play.

14.2.2 Football Foundation

The Football Foundation's *'National Facilities Strategy'* (2020) contains a priority for 'small-sided facilities to grow the small-sided game for teams and leagues, recreational and informal play'. MUGAs have an important role to play in this regard and the Football Foundation has grants of up to £25,000 to improve playing surfaces for recreational football and small-sided facilities. The *'Tonbridge and Malling Local Football Facility Plan'* (2020) was commissioned by the Football Foundation in conjunction with other partners and identified a priority for a MUGA at East Peckham Playing Fields.

14.2.3 England Netball

England Netball's *'Adventure Strategy 2021 - 2031'* (2021) include a 'destination termed 'a Game for Life'. This includes an aspiration to have 'a place to play within easy travel of every household'. To facilitate this, England Netball is keen to encourage the provision of netball court markings on all Multi-use Games Areas (MUGAs), to expand opportunities to play the game.

14.3 Stakeholder consultation

None of the neighbouring local authorities has an assessment of MUGA needs.

14.4 Informal outdoor facilities demand

14.4.1 Expressed demand

Expressed demand for informal outdoor facilities is difficult to gauge because all facilities are accessed on a casual basis and usage is therefore 'unmetered'. However, consultation with local providers indicates that the facilities are receiving regular use.

14.4.2 Displaced demand

Displaced demand relates to activity from within the study area which takes place outside of the area, or vice versa. Given the localise catchment of informal outdoor facilities, there is no evidence of cross-border usage, either into or out of the borough.

14.4.3 Unmet demand

There is no evidence of unmet demand for informal outdoor facilities in Tonbridge and Malling at present.

14.4.4 Latent demand

Whereas unmet demand is known to currently exist latent demand is demand that evidence suggests may be generated from the current population should they have access to more or better provision. There is no evidence of any latent demand for informal outdoor facilities in Tonbridge and Malling.

14.4.5 Future demand

This has been assessed as follows:

- ***Local trends:*** Sport England's *'Active Lives'* survey recorded the proportion of the adult (16+) population who are active for at least 150 minutes per week in Tonbridge and Malling between 2015 and the present. The results are tabulated below and show that whilst rates have fluctuated over the survey periods, there is a downward trend between 2015 and 2022:

Nov '15 - Nov '16	***May '16 - May '17***	***Nov '16- Nov '17***	***May '17- May '18***	***Nov '17- Nov '18***	***May '18- May '19***	***Nov '18-Nov '19***	***May '19- May '20***	***Nov '19-Nov '20***	***May '20- May '21***	***Nov '20-Nov '21***	***Nov '21-Nov '22***	***% Change***
66.3%	66.9%	66.8%	67.4%	68.8%	69.5%	69.4%	66.0%	66.0%	66.6%	65.1%	64.2%	-2.5%

- ***Participation rates:*** Sport England's 'Active Lives' survey has recorded national adult (aged 16+) participation rates in the sports that use MUGAs and outdoor sports facilities between 2015 and 2022 as follows:

Survey period	***Basketball***	***Football***	***Netball***	***Tennis***	***Rollerskating***
Nov '15 - Nov '16	0.7%	5.2%	0.7%	2.0%	0.3%
May '16 - May '17	0.7%	5.1%	0.6%	2.9%	0.3%
Nov '16 - Nov '17	0.7%	5.0%	0.6%	2.9%	0.3%
May '17 - May '18	0.7%	4.7%	0.6%	2.9%	0.4%
Nov '17 - Nov '18	0.7%	4.5%	0.6%	1.7%	0.4%
May '18 - May '19	0.6%	4.5%	0.7%	1.7%	0.4%
Nov '18 - Nov '19	0.6%	4.4%	0.7%	1.6%	0.3%

Survey period	Basketball	Football	Netball	Tennis	Rollerskating
May '19 - May '20	0.6%	4.1%	0.6%	1.6%	0.4%
Nov '19 - Nov '20	0.5%	3.0%	0.4%	1.5%	0.3%
May '20 - May '21	0.4%	2.2%	0.2%	1.4%	0.3%
Nov '20 - Nov '21	0.5%	3.3%	0.3%	1.4%	0.4%
Nov '21 - Nov '22	0.6%	4.4%	0.6%	2.0%	0.4%
% CHANGE	**0.0%**	**-0.8%**	**-0.1%**	**0.0%**	**+0.1%**

- ***Population growth:*** Two scenarios are considered:

  - The ONS 2018 sub-national population projections forecast a population of 152,859 by 2041, an increase of 20,659 (or 15.6%).
  - Objectively assessed Local Housing Need (LHN) amounts 839 dwellings per year (15,941 dwellings by 2041). The precise location of development has yet to be determined, but at an average of 2.3 people per dwelling this would amount to a population increase of approximately 36,664 to 168,864 (or 27.7%).

14.4.6 Key findings on demand

The key findings on demand are as follows:

- General levels of demand for the sports and activities that use informal outdoor facilities is broadly static.
- Future demand patterns are likely to increase based upon projected population increases.

14.5 Informal outdoor facilities supply

14.5.1 Introduction

This section summarises the detail of Informal outdoor sports facilities supply in Tonbridge and Malling:

- MUGAs are defined as hard-surfaced courts surrounded by robust, high fences with markings for football, basketball and other sports.
- BMX and Skate Parks are defined as purpose-built facilities with a range of slopes, structures and surfaces for skateboarding, BMX, scooter, wheelchair and inline skating.
- Outdoor Gyms are defined as purpose-built facilities with a range of exercise equipment for informal use in an outdoor setting.

14.5.2 Multi-use Games Areas

- ***Quantity:*** The location and number of MUGAs with community use in Tonbridge and Malling is as follows. Sports lit facilities are asterisked:

Site	Address	Sub-area
Aylesford Recreation Ground	Forstal Road, Aylesford ME20 7AU	Mallings
Borough Green Recreation Ground	Harrison Road, Borough Green TN15 8SD	Mallings
Burham Recreation Ground	Rochester Road, Burham ME1 3SF	Mallings
Clare Park Playing Field	Mill Street, East Malling ME19 6DN	Mallings

Site	Address	Sub-area
Ditton Community Centre*	Kiln Barn Road, Ditton ME20 6AH	Mallings
East Malling Recreation Ground	New Road, East Malling ME19 6DD	Mallings
East Peckham Playing Field	Pippin Road, East Peckham TN12 5BT	Tonbridge
Ferryfield Recreation Ground	Medway Court, Aylesford ME20 7QN	Mallings
Hildenborough Recreation Ground	Riding Lane, Hildenborough TN11 9HY	Tonbridge
Larkfield Recreation Ground	New Hythe Lane, Larkfield ME20 6PT	Mallings
Leybourne Chase	Bannister Way, Leybourne ME19 5GQ	Mallings
Potyns Field	Paddlesworth Road, Snodland ME6 5DN	Mallings
Stone House Field	Stone House Farm, Platt TN15 8LF	Mallings
Tonbridge Farm Sports Ground	Darenth Avenue, Tonbridge TN10 3JF*	Tonbridge
Wateringbury Playing Field	Fields Lane, Wateringbury ME18 5RS	Mallings
West Malling Primary School	Norman Road, West Malling ME19 6RL	Mallings
Whitegate Field	Old London Road, Wrotham TN17 7DL*	Mallings
Williams Field	Marshall Gardens, Hadlow TN11 0HQ*	Tonbridge

Provision by sub-area: MUGA provision by sub-area are as follows:

Sub-area	Population	No. MUGAs	MUGAs per capita
Tonbridge and surrounds	56,018	4	1: 14,005
Mallings and surrounds	76,182	14	1: 5,442
TONBRIDGE & MALLING	***132,200***	***18***	***1: 7,344***

- ***Quality:*** The quality of MUGAs was assessed by a non-technical visual inspection during a site visit to all sites. The criteria that were assessed were as follows:

  - ***The court:*** Court surface, line markings and fitness for purpose.
  - ***Fencing:*** Condition and appearance.
  - ***Disability access:*** Provision for disabled access to the courts.
  - ***Lighting:*** The quality, illumination levels and evenness of floodlights.

The facilities were rated on a five-point scale, where 5 equates to 'very good' (highlighted in green below), 4 to 'good' (also highlighted in green below), 3 to 'average', 2 to 'poor' (highlighted in red below) and 1 to 'very poor'.

Facility	Court	Fencing	Disability Access	Lighting
Aylesford Recreation Ground	3	4	2	-
Borough Green Recreation Ground	3	4	2	-
Burham Recreation Ground	4	5	3	-
Clare Park Playing Field	4	5	3	-
Ditton Community Centre	4	5	3	5
East Malling Recreation Ground	4	4	2	-
East Peckham Playing Field	3	5	2	-
Ferryfield Recreation Ground	4	4	3	-
Hildenborough Recreation Ground	3	4	1	-
Larkfield Recreation Ground	4	5	2	-
Leybourne Chase	4	5	2	-
Racecourse Sports Ground	4	4	2	-
Stone House Field	3	-	2	-
Tonbridge Farm Sports Ground	4	5	2	3
Trottiscliffe Village Hall	5	5	1	-
Wateringbury Playing Field	3	-	1	-

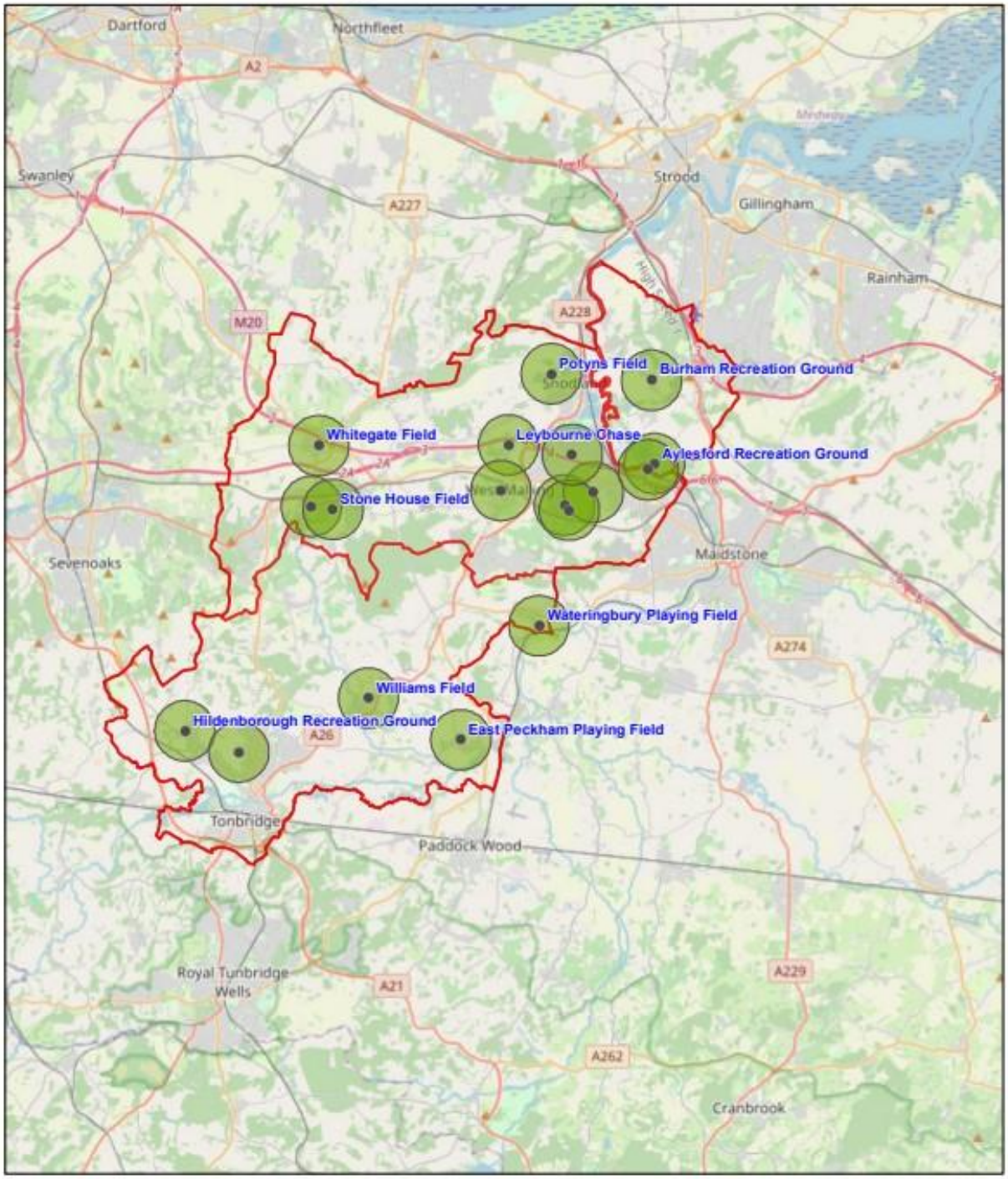
Facility	Court	Fencing	Disability Access	Lighting
Williams Field	4	5	3	4
Wrotham Recreation Ground	4	5	2	4

- ***Accessibility:*** A 10-minute walking time catchment is appropriate to define accessibility to MUGAs. On this basis, there are some geographical gaps in provision.
- ***Availability:*** All MUGAs are freely accessible at all times, although none are sports lit and they are therefore usable during the hours of darkness.

Key findings on supply: The key findings on supply are as follows:

- There are 18 MUGAs in Tonbridge and Malling, with most provision concentrated in the north of the borough. Only four MUGAs are sports lit, which prevents the use of the non-sports lit provision during the hours of darkness.
- There is no evidence of any unmet demand.
- There are some quality issues, particularly relating to disabled access.
- There are some geographical gaps in provision.
- Access to all MUGAs is free-of-charge.

Tonbridge and Malling - Multi Use Games Areas 10 mins walk



2/11/2024

1:300,000

0 1.5 3 6 mi

0 2.5 5 10 km

- Multi Use Games Areas
- 10 mins walk time
- Sub Areas - Tonbridge Surrounds and Malling Surrounds
- Tonbridge and Malling District Boundary

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14.5.3 BMX and Skate Parks

- ***Quantity:*** BMX and Skate Parks are defined as purpose-built facilities with a range of slopes, structures and surfaces for skateboarding, BMX, scooter, wheelchair and inline skating. The following facilities are in Tonbridge and Malling:

Site	*Address*	*Sub-area*
Burham Recreation Ground	Rochester Road, Burham ME1 3SF	Mallings
Eccles Sports Ground	Bull Lane, Eccles ME20 7HF	Mallings
Larkfield Recreation Ground	New Hythe Lane, Larkfield ME20 6PT	Mallings
Racecourse Sports Ground	The Slade, Tonbridge TN9 1HR	Tonbridge
Snodland Community Centre Pump Track	Cemetery Road, Snodland ME6 5BF	Mallings
Tonbridge Farm Sports Ground	Darenth Avenue, Tonbridge TN10 3JF	Tonbridge
Williams Field	Marshall Gardens, Hadlow TN11 0HQ	Tonbridge

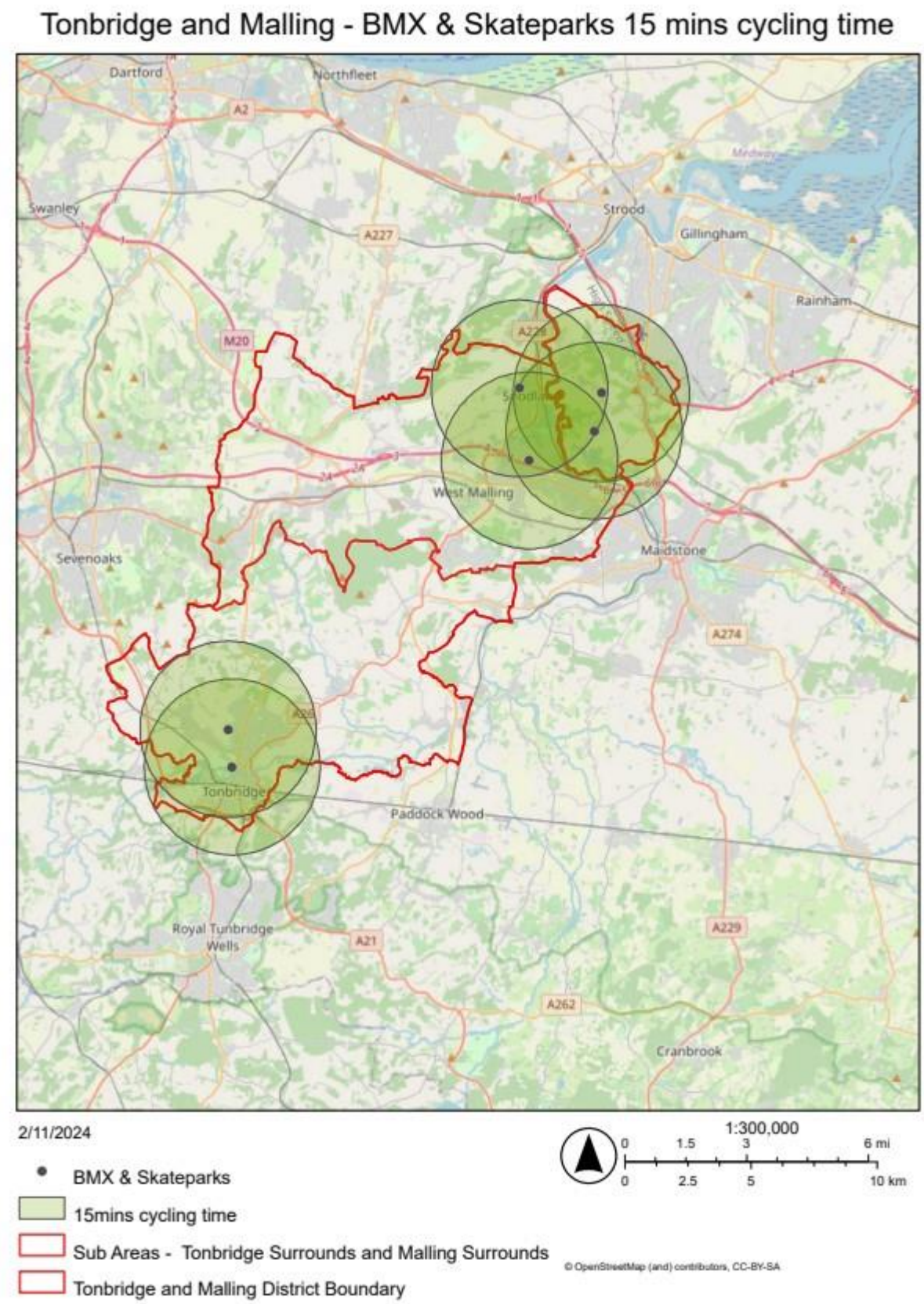
The distribution of BMX and Skate Parks across each sub-area is listed below.

Sub-area	*Population*	*No. Skate parks*	*Skate parks per capita*
Tonbridge and surrounds	56,018	2	1: 28,009
Mallings and surrounds	76,182	5	1: 15,236
TONBRIDGE & MALLING	***132,200***	***7***	***1: 18,886***

- ***Quality:*** The quality of the BMX and Skateboard sites was assessed by a visual, non-technical inspection which looked at a range of factors including quality and safety of the surface and ancillary facilities such as seats and bins. One site is equipped with floodlights. Access to sites as also assessed taking into particular account access for children and young people with disabilities. These factors were assessed on a scale of 1 to 5 with 5 being the highest mark.

Facility	*Track*	*Ancillary*	*Access*	*Disability Access*	*Lighting*
Burham Recreation Ground	5	3	5	1	
Eccles Sports Ground	5	3	5	1	
Larkfield Recreation Ground	5	3	5	1	
Racecourse Sports Ground	5	3	5	1	-
Snodland Community Centre Pump Track	5	5	5	4	-
Tonbridge Farm Sports Ground	5	5	5	1	-
Williams Field	5	5	5	1	4

- ***Accessibility:*** A 15-minute cycling time catchment is appropriate for BMX and Skateboard sites. Based upon this, the map overleaf shows that there are some geographical gaps in provision in the centre of the borough, notably around Kings Hill.



- ***Availability:*** All the sites listed are free to access at all times.

Key findings on supply: The key findings on supply are as follows:

- There are seven BMX and Skateboard sites in Tonbridge and Malling with a good geographical distribution.
- There is no evidence of any unmet demand.
- There are some quality issues, particularly relating to disabled access.
- There are some geographical gaps in provision in the centre of the borough, notably around Kings Hill.
- Access to all facilities is free-of-charge.

14.5.4 Outdoor Gyms

- ***Quantity:*** Outdoor Gyms are defined as purpose-built facilities with a range of exercise equipment for informal use in an outdoor setting. The following facilities are in Tonbridge and Malling:

Site	*Address*	*Sub-area*
Aylesford Recreation Ground	Forstal Road, Aylesford ME20 7AU	Mallings
Castle Way Outdoor Gym	Castle Way, Leybourne ME19 5HE	Mallings
Clare Park Playing Field	Mill Street, East Malling ME19 6DN	Mallings
Ditton Community Centre	Kiln Barn Road, Ditton ME20 6AH	Mallings
East Peckham Playing Field	Pippin Road, East Peckham TN12 5BT	Tonbridge
Eccles Sports Ground	Bull Lane, Eccles ME20 7HF	Mallings
Ferryfield Recreation Ground	Medway Court, Aylesford ME20 7QN	Mallings
Larkfield Recreation Ground	New Hythe Lane, Larkfield ME20 6PT	Mallings
Racecourse Sports Ground	The Slade, Tonbridge TN9 1HR	Tonbridge
Tonbridge Farm	Darenth Avenue, Tonbridge TN10 3JF	Tonbridge
Tunbury Recreation Ground	Fernbank Road, Bluebell Hill ME5 9NH	Mallings
Wateringbury Playing Field	Fields Lane, Wateringbury ME18 5RS	Mallings
Wouldham Recreation Ground	Knowle Road, Wouldham ME1 3XA	Mallings

The distribution of outdoor gyms across each sub-area is listed below.

Sub-area	*Population*	*No. Outdoor Gyms*	*Outdoor Gyms per capita*
Tonbridge and surrounds	56,018	3	1: 18,703
Mallings and surrounds	76,182	10	1: 7,618
TONBRIDGE & MALLING	***132,200***	***13***	***1: 10,169***

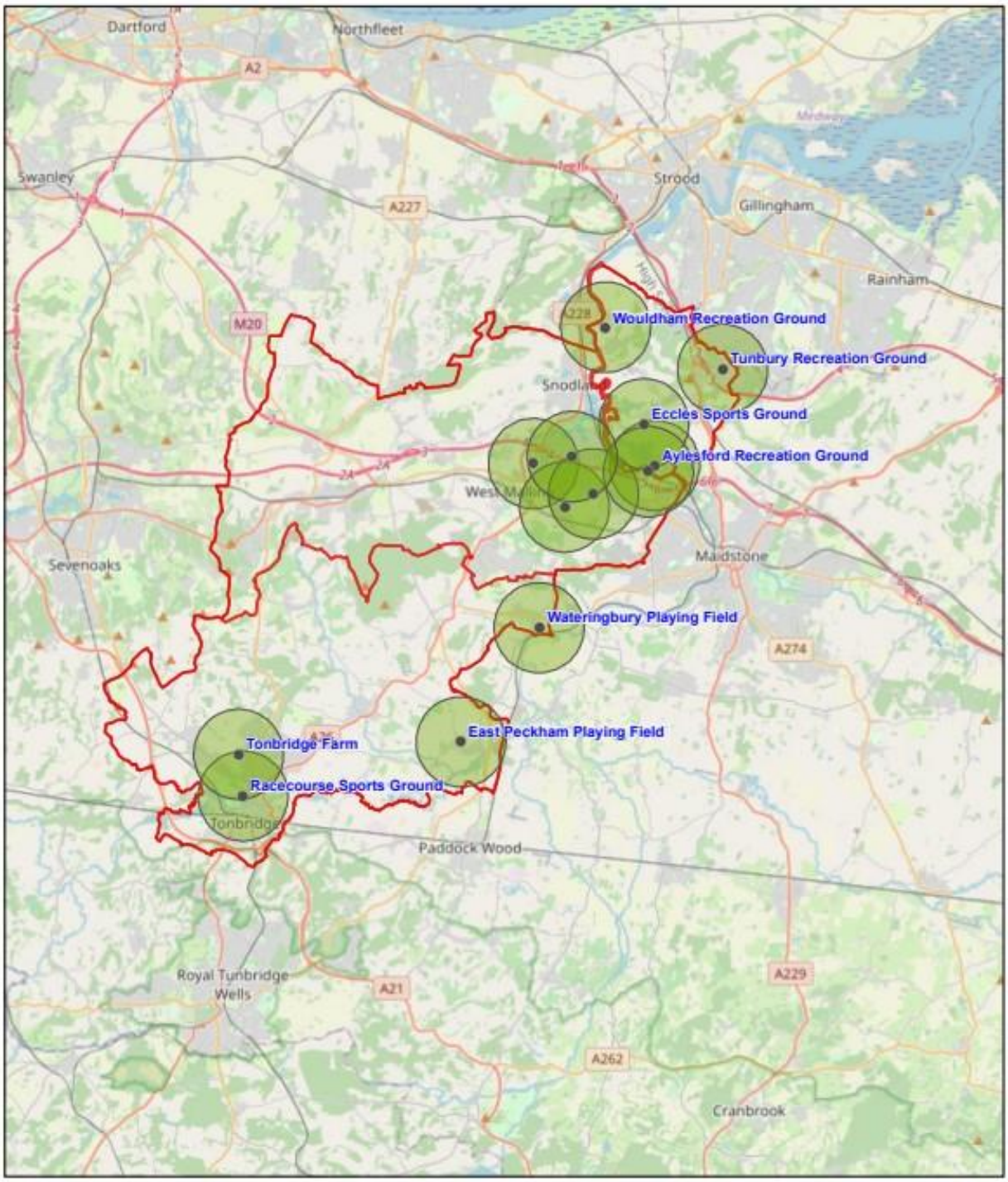
- ***Quality:*** The quality of the outdoor gyms was assessed by a visual, non-technical inspection which looked at a range of factors including quality and quantity of equipment and the general attractiveness of the site including cleanliness and ancillary facilities such as seats and bins. Access to sites as also assessed taking into particular account access for people with disabilities. These factors were assessed on a scale of 1 to 5 with 5 being the highest mark.

Facility	*Equipment*	*Fencing*	*Disability Access*	*Lighting*
Aylesford Recreation Ground	2	-	1	-
Castle Way Outdoor Gym	4	3	2	-
Clare Park Playing Field	4	-	2	-

Facility	Equipment	Fencing	Disability Access	Lighting
Ditton Community Centre	4	-	2	3
East Peckham Playing Field	3	-	1	-
Eccles Sports Ground	5	3	1	-
Ferryfield Recreation Ground	4	-	2	-
Larkfield Recreation Ground	4	-	2	-
Racecourse Sports Ground	4	3	2	-
Tonbridge Farm	5	-	2	-
Tunbury Recreation Ground	4	-	2	-
Wateringbury Playing Field	3	-	1	-
Wrotham Recreation Ground	4	-	2	-

- ***Accessibility:*** A 15-minute walking time catchment is appropriate for outdoor gyms. On the basis of the map overleaf, there are a number of geographical gaps in provision in the borough.
- ***Availability:*** All outdoor gyms are freely accessible at all times during daylight.

Tonbridge and Malling - Outdoor Gyms 15 minutes walk time



2/11/2024

1:300,000

0 1.5 3 6 mi

0 2.5 5 10 km

- Outdoor Gyms
- 15 minutes walking time
- Sub Areas - Tonbridge Surrounds and Malling Surrounds
- Tonbridge and Malling District Boundary

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Key findings on supply: The key findings on supply are as follows:

- There are 13 outdoor gyms in Tonbridge and Malling, with most provision concentrated in the north of the borough.
- There is no evidence of any unmet demand.
- There are some quality issues, particularly relating to disabled access.
- There are a number of geographical gaps in provision in the borough.
- Access to all outdoor gyms is free-of-charge.

14.6 The balance between informal outdoor facilities supply and demand

Four criteria have been assessed to evaluate the balance between informal outdoor facilities supply and demand in Tonbridge and Malling:

- ***Quantity:*** Are there enough facilities with sufficient capacity now and in the future?
- ***Quality:*** Are the facilities fit for purpose for the users now and in the future?
- ***Accessibility:*** Are the facilities in the right location for users now and in the future?
- ***Availability:*** Are the facilities available for users now and in the future?

14.7 Quantity

14.7.1 Current needs

There is no evidence of a shortfall in current provision for informal outdoor facilities, based upon the following evaluation:

- ***Used capacity:*** Because all the informal outdoor facilities are available to use free-of-charge, there are no detailed usage figures, but demand appears to be buoyant. All existing facilities appear to have spare capacity.
- ***Satisfied demand:*** There is no evidence of unmet demand in the borough.

14.7.2 Future needs

Future demand patterns are likely to be similar to current levels, based on participation trends but the higher population projections will create a requirement for 15.6% additional capacity by 2041 under the lower population projections and 27.7% under the higher projections.

14.8 Quality

14.8.1 Current quality

The quality of most aspects of most facilities is at least ‘standard’, although disability access if poor at some sites.

14.8.2 Future quality

All facility providers will need to continue to invest in maintaining and improving their facilities.

14.9 Accessibility

14.9.1 Current accessibility

There is a concentration of MUGA and outdoor gym provision in the north of the borough, which reflects the active role played by parish councils in providing these types of facilities in the more rural communities in the Mallings sub-area.

14.9.2 Future accessibility

The sub-area analysis highlights anomalies in per capita levels of provision across the borough and when opportunities arise to provide additional facilities in the future, locational preferences should be guided by current shortfalls.

14.10 Availability

14.10.1 Current availability

All existing sites are free to access at all times.

14.10.2 Future availability

It is reasonable to assume that similar access arrangements will be offered in the future.

14.11 The options for securing informal outdoor facilities capacity

The options for securing existing informal outdoor facilities capacity to meet current and future needs are as follows:

14.11.1 Protect

Protecting existing informal outdoor facilities through the Local Plan will be key both to securing local provision by ensuring that planning policy supports the retention of existing facilities, unless the loss of a facility would involve its replacement with a facility of at least the equivalent size, quality and accessibility.

14.11.2 Provide

A range of informal outdoor facilities will be required to meet the needs of the additional population arising from housing developments.

14.11.3 Enhance

Enhancing existing informal outdoor facilities capacity by ensuring they receive regular maintenance and improvements will be key to preserving current provision.

14.12 Action Plan

14.12.1 Introduction

The tables below set out the action plan for informal outdoor sports facilities to guide the implementation of the strategy. The capital cost estimates are based upon Sport England's *'Facility Costs - Second Quarter of 2023'* (2023).

14.12.2 Key strategic actions

Issues	Action	Lead	Partners	Resources	Priority
Protection of existing informal outdoor facilities.	Include a policy in the Local Plan to protect all existing informal outdoor facilities.	TMBC Planning Policy	Sport England/ Active Kent and Medway	-	High
Funding for future informal outdoor facilities.	Ensure that S106 contributions are collected from developers and/or provision is made within new developments.	TMBC Planning Development Management	Sport England/ Active Kent and Medway	-	High
Sports lighting energy efficiency	Replace old sports lighting with LED heads and upgrade switching gear	Site owners	LTA	£30,000 per site	Medium

14.12.3 Site-specific actions

- ***Multi-use Games Areas***:

Site	Issues	Action	Lead	Partners	Resources	Priority
Aylesford Recreation Ground	Poor disabled access	Provide a tarmac path from the access point	Aylesford PC	-	£1,500	Medium
Borough Green Recn. Ground	Poor disabled access	Provide a tarmac path from the access point	Borough Green PC	-	£1,500	Medium
Burham Recreation Ground	No current issues	No action	Barham PC	-	£1,500	Medium
Clare Park Playing Field	No current issues	No action	-	-	-	-
Ditton Community Centre	No current issues	No action	-	-	-	-
East Malling Recreation Ground	Poor disabled access	Provide a tarmac path from the access point	East Malling PC	-	£1,500	Medium
East Peckham Playing Field	Poor disabled access	Provide a tarmac path from the access point	East Peckham PC	-	£1,500	Medium
Ferryfield Recreation Ground	No current issues	No action	-	-	-	-
Hildenborough Recn. Ground	Poor disabled access	Provide a tarmac path from the access point	Hildenborough PC	-	£1,500	Medium
Larkfield Recreation Ground	Poor disabled access	Provide a tarmac path from the access point	Larkfield PC	-	£1,500	Medium
Leybourne Chase	Poor disabled access	Provide a tarmac path from the access point	Leybourne PC	-	£1,500	Medium
Racecourse Sports Ground	Poor disabled access	Provide a tarmac path from the access point	TMBC	-	£1,500	Medium

Site	Issues	Action	Lead	Partners	Resources	Priority
Stone House Field	Poor disabled access	Provide a tarmac path from the access point	Platt PC	-	£1,500	Medium
Tonbridge Farm Sports Ground	Poor disabled access	Provide a tarmac path from the access point	TMBC		£1,500	Medium
Trottiscliffe Village Hall	Poor disabled access	Provide a tarmac path from the access point	Trottiscliffe PC	-	£1,500	Medium
Wateringbury Playing Field	Poor disabled access	Provide a tarmac path from the access point	Wateringbury PC	-	£1,500	Medium
Williams Field	No current issues	No action	-	-	-	-
Wrotham Recreation Ground	Poor disabled access	Provide a tarmac path from the access point	Wrotham PC	£1,500	Medium	£1,500

- ***BMX/Skate Parks***:

Site	Issues	Action	Lead	Partners	Resources	Priority
Burham Recreation Ground	Poor disabled access	Provide a tarmac path from the access point	Burham PC	-	£1,500	Medium
Eccles Sports Ground	Poor disabled access	Provide a tarmac path from the access point	Eccles PC	-	£1,500	Medium
Larkfield Recreation Ground	Poor disabled access	Provide a tarmac path from the access point	Larkfield PC	-	£1,500	Medium
Racecourse Sports Ground	Poor disabled access	Provide a tarmac path from the access point	TMBC	-	£1,500	Medium
Snodland Community Centre Pump Track	No current issues	No action	-	-	-	-
Tonbridge Farm Sports Ground	Poor disabled access	Provide a tarmac path from the access point	TMBC	-	£1,500	Medium
Williams Field	Poor disabled access	Provide a tarmac path from the access point	Hadlow PC	-	£1,500	Medium

- ***Outdoor Gyms***:

Site	Issues	Action	Lead	Partners	Resources	Priority
Aylesford Recreation Ground	• Poor equipment • Poor disabled access	• Renew equipment • Provide a tarmac path from the access point	Aylesford PC	-	£5,000 for equipment £1,500 for access path	High
Castle Way Outdoor Gym	Poor disabled access	Provide a tarmac path from the access point	Leybourne PC	-	£1,500	Medium

Site	Issues	Action	Lead	Partners	Resources	Priority
Clare Park Playing Field	Poor disabled access	Provide a tarmac path from the access point	East Malling PC	-	£1,500	Medium
Ditton Community Centre	Poor disabled access	Provide a tarmac path from the access point	Ditton PC	-	£1,500	Medium
East Peckham Playing Field	Poor disabled access	Provide a tarmac path from the access point	East Peckham PC	-	£1,500	Medium
Eccles Sports Ground	Poor disabled access	Provide a tarmac path from the access point	Eccles PC	-	£1,500	Medium
Ferryfield Recreation Ground	Poor disabled access	Provide a tarmac path from the access point	Aylesford PC	-	£1,500	Medium
Larkfield Recreation Ground	Poor disabled access	Provide a tarmac path from the access point	Larkfield PC	-	£1,500	Medium
Racecourse Sports Ground	Poor disabled access	Provide a tarmac path from the access point	TMBC	-	£1,500	Medium
Tonbridge Farm	Poor disabled access	Provide a tarmac path from the access point	TMBC	-	£1,500	Medium
Tunbury Recreation Ground	Poor disabled access	Provide a tarmac path from the access point	Aylesford PC	-	£1,500	Medium
Wateringbury Playing Field	Poor disabled access	Provide a tarmac path from the access point	Wateringbry PC	-	£1,500	Medium
Wrotham Recreation Ground	Poor disabled access	Provide a tarmac path from the access point	Wrotham PC	-	£1,500	Medium

15 APPLYING AND REVIEWING THE STRATEGY

15.1 Introduction

This section identifies the applications of the Tonbridge and Malling PPS and the mechanisms for reviewing it to ensure that it remains robust and up-to-date.

15.2 Strategy applications

The success of the PPS will be determined by how it is used. While the use of the PPS should be led by Tonbridge and Malling Borough Council, its application and delivery should be the responsibility of the project steering group involving other key local stakeholders including Sport England and the governing bodies of the pitch sports. The PPS has a number of applications:

15.2.1 Sports development planning

The PPS can be applied to help:

- Highlight, justify and make the case for sports development activities with particular sports, groups and clubs and in particular areas.
- Identify current and future trends and changes in the demand for individual sports and how they are played.
- Inform the work, strategies and plans of sporting organisations active in the area.
- Advocate the need to work with specific educational establishments to secure community use of their site(s).
- Develop and/or enhance school club links by making the best use of school sites where they have spare capacity and are well located to meet demand.

15.2.2 Planning policy

The PPS can be applied to help:

- Develop new, and review the effectiveness of existing, local planning policy (e.g. Local and Neighbourhood Plans) in line with the National Planning Policy Framework (NPPF).
- The implementation of local planning policy to meet the needs of the community in line with the NPPF.

15.2.3 Planning applications

The PPS can be applied to help:

- Inform the development of planning applications which affect existing and/or proposed new sports facilities provision.
- Inform pre-application discussions to ensure any subsequent planning applications maximise their benefit to sport and are developed in line with national and local planning policy.
- Sports clubs and other organisations provide the strategic need for development proposals thereby potentially adding support to their application(s) and saving them resources in developing such evidence.

- The Council to assess planning applications affecting existing and/or proposed new playing pitch provision in line with national and local planning policy.
- Sport England and other parties respond to relevant planning application consultations.

The PPS can also be applied to help the Council to meet other relevant requirements of the NPPF including:

- Taking account of and supporting local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.
- Delivering the social, recreational, cultural facilities and services the community needs.
- Planning positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the framework.
- Working with public health leads and health organisations to understand and take account of the health status and needs of the local population, including expected future changes, and any information about relevant barriers to improving health and well-being).

15.2.4 Section 106 Agreements

The PPS can be applied to help:

- Ensure that playing pitch and outdoor sports facilities provision is taken into account when the local authority seeking developer contributions.
- Provide prioritised infrastructure requirements for playing pitch provision including deliverable sport, area and site-specific projects with costings (where known).

15.2.5 Funding bids

The PPS can be applied to help:

- Provide the evidence base and strategic need to support funding bids by a range of parties to a variety of potential funding sources.
- Inform potential bidders of the likely strategic need for their project.

15.2.6 Facility and asset management

The PPS can be applied to help:

- Ensure a strategic approach is taken to the provision and management of playing pitches.
- Inform the current management, strategies and plans of playing pitch providers e.g. the Council, leisure trusts and educational establishments.
- Share knowledge of how sites are managed and maintained, the lessons learnt and good practice.
- Highlight the potential of asset transfers and ensure any proposed are beneficial to all parties.
- Provide additional protection for particular sites over and above planning policy, for example through deeds of dedication.
- Resolve issues around security of tenure.

15.2.7 Public health

The PPS can be applied to help:

- Understand how the community currently participates in sport, the need for playing pitches and how this may evolve.
- Raise awareness of and tackle any barriers to people maintaining and increasing their participation.
- Highlight and address any inequalities of access to provision within the study area.
- Provide evidence to help support wider health and well-being initiatives.

15.2.8 Co-ordinating resources and investment

The PPS can be applied to help:

- Raise awareness of the current resources and investment (revenue and capital) going into the management, maintenance and improvement of playing pitch provision.
- Co-ordinate the current and any future resources and investment to ensure the maximum benefit to sport and that value for money is secured.
- Ensure the current and any future resources and investment are complimentary and do not result in their inefficient use.

15.2.9 Capital programmes

The PPS can be applied to help:

- Provide the evidence base to justify the protection and investment in playing pitch provision.
- Influence the development and implementation of relevant capital programmes (e.g. school refurbishment and new build programmes).

15.3 Monitoring delivery

A process should be put in place to ensure regular monitoring of how the recommendations and action plan are being delivered. This monitoring should be led by Tonbridge and Malling Borough Council and supported by all members of, and reported back to, the steering group. Understanding and learning lessons from how the PPS has been applied should also form a key component of monitoring its delivery.

15.4 Keeping the Study robust and up-to-date

Along with ensuring that the PPS is used and applied, a process should be put in place to keep it robust and up to date. This will expand the life of the PPS, providing people with the confidence to continue to both use it and attach significant value and weight to its key findings and issues, along with its recommendations and actions.

Sport England advocates that the PPS should be reviewed on a regular basis from the date it is formally signed off by the steering group. This will help to maintain the momentum and commitment built up when developing the PPS. Taking into account the time to develop the PPS this should also help to ensure that the original supply and demand information is no more than two years old without being reviewed.

The reviews should highlight:

- How the delivery of the recommendations and action plan has progressed and any changes required to the priority afforded to each action (e.g. the priority of some may increase following the delivery of others).
- How the PPS has been applied and the lessons learnt.
- Any changes to particularly important facilities and/or sites in the area (e.g. the most used or high-quality sites for a particular sport) and other supply and demand information, what this may mean for the overall assessment work and the key findings and issues.
- Any development of a specific sport or particular format of a sport.
- Any new or emerging issues and opportunities.

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Housing and Planning Scrutiny Select Committee

15 July 2025

Part 1 - Public

Matters for Cabinet - Non-key Decision

Cabinet Member	Cllr Mike Taylor, Cabinet Member for Planning
Responsible Officer	Eleanor Hoyle, Director of Planning, Housing & Environmental Health
Report Author	Eleanor Hoyle, Director of Planning, Housing & Environmental Health

Planning Technical Consultation Responses

1 Summary and Purpose of Report

1.1 To provide Members with an update on technical consultations that have been published by the Ministry of Housing, Communities and Local Government (MHCLG). These relate to improving transparency and monitoring of building out of schemes and to proposed reforms to Planning committees including their size and which types of application can be considered by those committees.

2 Corporate Strategy Priority Area

2.1 Efficient services for all residents, maintaining an effective Council.

3 Recommendations

3.1 NOTE the response to the “Implementing measures to improve Build Out transparency: Technical consultation”, which was submitted ahead of the 7 July deadline by the Director of Planning, Housing & Environmental Health in consultation with the Cabinet Member for Planning.

3.2 ENDORSE the response to the “Reform of Planning Committees: Technical consultation” and RECOMMEND to the Cabinet Member for Planning that he approves submission of the response.

4 Introduction and Background

4.1 The legislative framework for the proposed changes in these consultations is the Levelling Up and Regeneration Act (2023) and the Planning & Infrastructure Bill (2024/25).

4.2 Since the current Government was formed last year, they have maintained a fast-paced programme of consultations and updates to the Planning system.

5 Proposal

5.1 The submitted response to the “Implementing measures to improve Build Out transparency: Technical consultation” is attached to this report at **Annex 1**. Due to the timescales involved, this response was submitted under delegated powers in consultation with the Cabinet Member. In general, it is encouraging to see that the Government is considering measures to ensure that schemes are commenced and built out in timely manner and provides a framework for this happening.

5.2 This consultation also references other forthcoming consultations – of particular note are the proposed changes to Planning Fees regulations, which will be considered and reported to Members in due course.

5.3 The proposed draft response to the “Reform of Planning Committees: Technical Consultation” is appended to this report at **Annex 2.** The consultation proposes reforms to the size of Planning Committees, as well as suggesting that Members on a Planning Committee would be required to have a certified programme of training. It also looks at a potential tiering scheme to determine which types of application would be able to be considered by Planning Committee and which would be delegated to officers. Members should note that the consultation does not suggest that everything in the relevant Tier would go to Committee, rather that it would be able to be referred to Committee should it meet certain locally set requirements. Members and Officers of this Council have worked collaboratively to seek agreement on a Call-In protocol to manage this process, which is seemingly not something that is working well in some Local Planning Authorities.

5.4 This consultation closes on 23 July 2025 and a draft response could therefore be incorporated into reporting timescales for this committee.

6 Other Options

6.1 The Council could decide not to respond to technical consultations when the opportunity arises. However, this would mean that views of local Members, on behalf of their constituents, would not be represented and available to central government for consideration.

7 Financial and Value for Money Considerations

7.1 The Director of Planning, Housing & Environmental Health confirms that the proposals contained in the recommendation(s), if approved, will fall within the Council's Budget and Policy Framework.

8 Risk Assessment

8.1 There is a risk that Government implements changes without consideration for the financial impact on Councils.

9 Legal Implications

9.1 Constitutional changes are likely to be required should the Government implement the proposed changes to Planning Committees.

10 Consultation and Communications

10.1 Group Leaders received a draft of the “Implementing measures to improve Build Out transparency: Technical consultation” draft response prior to the submission deadline.

11 Implementation

11.1 Subject to recommendations to be made by the Scrutiny Select Committee, a response to the “Reform of Planning Committees: Technical consultation” can be submitted under the Director of Planning, Housing & Environmental Health’s delegated authority. The response, if approved, would then be submitted via the online portal prior to the deadline.

12 Cross Cutting Issues

12.1 Climate Change and Biodiversity

12.1.1 Limited or low impact on emissions and environment.

12.1.2 Climate change advice has not been sought in the preparation of the options and recommendations in this report.

12.2 Equalities and Diversity

12.2.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

Background Papers	None
Annex 1 Annex 2	Implementing measures to improve Build Out transparency: Technical consultation Reform of Planning Committees: Technical Consultation

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Introduction

1. The government is committed to delivering 1.5 million new homes over this parliament and continuing into the next parliament – and wants to ensure more homes are built over the longer term. To achieve this, the government is implementing major reforms to the planning system. These include measures in the Planning and Infrastructure Bill to reintroduce strategic planning, modernise planning committees, and enable a more strategic approach to meeting environment objectives, as well as a set of national policies for decision making, which we will consult on in the coming months.

2. As part of these reforms, we want to increase the rate at which planning permissions for residential development are built out. Too many developments secure planning permission but then are either stalled or not built out quickly to the frustration of LPAs and their communities. The government's overall strategy on build out is set out in the speeding up build out working paper.

3. As a critical first step, we want to ensure there is greater transparency and accountability about the build out of new residential development. Using new powers introduced by the LURA along with existing planning powers in the TCPA 1990, we propose to introduce a new statutory build out reporting framework which would apply to new eligible residential development as defined in paragraph 18[footnote 1]. This framework will mean that for these types of developments it will be a requirement to:

- submit a build out statement with a planning application to LPAs
- notify LPAs before development is commenced through a commencement notice
- report annually to LPAs on housing delivery through a development progress report

4. We also propose to implement the new power introduced by section 113 of the LURA for LPAs to decline to determine planning applications made by developers[footnote 2] who fails to build out development authorised by an earlier planning permission at a reasonable rate. This will provide LPAs with an important new sanction to address developers who persistently fail to build out quickly. The full package of these measures is referred to in this document as 'build out measures'.

5. This technical consultation seeks to gather views on these proposals, in particular seeks specific views on:

- the type of development these build out measures will apply to
- introducing and implementing build out statements
- implementing commencement notices
- implementing development progress reports
- sites where multiple developers are involved in build out
- implementing the power to decline to determine applications
- potential impacts of the proposed measures

6. Subject to the outcome of the consultation, the intention is to bring forward the regulations to implement these measures at the earliest practical opportunity with the new build out reporting framework coming into force from 2026. An Impact Assessment will be prepared for the regulations.

7. Implementing this build out reporting framework is only the first step of a series of measures that the government intends to take forward to improve the speed of build out. As part of the consultation on national policies for decision making, we will consider ways to maximise the effectiveness of these new build out requirements by looking at options for stronger national policies on build out, including aligning with the proposals in this consultation on build out statements. Over the course of the year we will set out more information on national policies for decision making.

8. In addition the government is inviting views in the speeding up build out working paper on options to ensure the right incentives exist in the housing market, and LPAs have the tools they need, to encourage homes to be build out quickly. This includes incentivising and supporting models of development that build out faster as well as giving LPAs the ability to charge a new 'Delayed Homes Penalty' as a backstop when development falls materially behind pre-agreed build out schedules. This will link to the transparency and accountability measures set out in this consultation document.

The importance of faster build out

9. Speeding up the rate at which planning permissions for residential development are built out will be critical to achieving the government's target of delivering 1.5 million homes over this Parliament and continuing it into the next parliament.

10. There are several reasons for why build out of residential development has often been slow. Multiple independent market studies such as the Letwin Review and the CMA Review last year have concluded that for market sale homes, the primary determinant of build out rates is how many homes developers expect to sell without reducing prices – the 'absorption rate'. The CMA[footnote 3] report found evidence suggesting that instead of housebuilders seeking to sell homes as quickly as possible, housebuilders tend to sell homes at a rate that is consistent with the local absorption rates – the rate at which houses can be sold without housebuilders needing to reduce their prices. They also found that housebuilders build homes at a slower pace to avoid having capital tied up in partly finished or finished, unsold homes.

11. The Letwin Review [footnote 4] also set out that increasing the diversity of dwellings on large sites in areas of high housing demand would help to achieve a greater rate of build out because the absorption rate of each category of housing will be complementary, resulting in a greater overall absorption of housing by the local market.

12. Independent research by Lichfields[footnote 5] in a recent publication on build out, which assessed the build out rate on a sample of large scale developments, showed the typical build out rate was between:

- 16 to 22 units per year for sites with 50 to 99 dwellings
- 35 to 60 units per year for sites with 100 to 499 dwellings
- 44 to 188 units per year for sites with 500+ dwellings

13. One of the key issues across all of these studies, however, is that there is a lack of comprehensive and systematic data on build out on a consistent basis. In particular, there is a lack of data transparency about progress once permissions have been granted which undermines transparency. Industry surveys like Lichfield's, while very useful, take time and can only be partial. There is no systematic data that government, LPAs and communities can use to fully track the progress of the commencement and build out of residential development in local areas. To ensure greater

transparency and a clearer picture of progress towards building out residential developments, we need more comprehensive and consistent data collected from these developments.

The government's plan for greater build out transparency

14. As a first step towards the faster build out of residential development, the government wants to ensure that there is sufficient transparency of data about the expected and actual build rates of all new eligible residential development. We propose to introduce a build out reporting framework with several new mandatory requirements for information at different stages of the planning and development cycle utilising provisions from the TCPA 1990 (including as inserted by the LURA). In future, developers[footnote 6] of all eligible new residential developments will be required:

- to include a build out statement with their planning application setting out the proposed build out plans for the development
- to notify the LPA that their development will commence through a commencement notice
- to submit a development progress report to the LPA each year setting out the progress they have made with housing delivery

15. Figure 1 shows what will need to be submitted at each stage of the planning and development cycle.

Figure 1: Diagram showing what new requirements will need to be submitted at each stage of the planning application and build out process.

alt text:

- Planning application stage
  The build out statement is submitted (as part of the planning application) to LPA.
- Post-permission stage
  A commencement notice is submitted to the LPA. Once this is submitted, building works will need to commence on the commencement date in the notice - if not a further commencement notice will need to be submitted.
- Build-out stage
  A development progress report is submitted every year for the duration of the build out process to the LPA, until the development is completed.

16. The combination of these information requirements will give a comprehensive picture of progress for each eligible residential development. To ensure these new requirements work effectively, aligning with the government's wider digitisation of the planning system, we intend for build out statements, commencement notices and development progress reports to be submitted electronically on template forms underpinned by data standards. As part of this we will make provisions in regulations about the information relating to build out statements, commencement notices and development progress reports which will be included in the planning register and so will be publicly available.

17. These information requirements will in particular:

- enable LPAs to consider proposed build rates for development when determining planning applications
- provide a clear indication of when and what development (including which planning permission) has commenced for the first time
- enable the compiling of developer 'track records' of their build out performance
- help to unlock further and more accurate planning data on developments which have been commenced

2. What developments will be subject to the new build out measures

18. This section of the consultation sets out the types of residential development and size threshold of sites in scope of these new build out measures. This is what is referred to throughout this document as "eligible residential development".

What residential development will be in scope

19. It is proposed that the build out measures will apply to developments that involve the building of new dwellings that meet the threshold below. This will include houses and flats of all tenures and include mixed use development where dwellings are provided. This development has been selected to be in scope as it will play a key role in meeting the government's target of 1.5 million homes and as set out above, having sufficient transparency of data about the expected and actual build rates will be a key first step to ensuring faster build out of these developments.

20. We are seeking views on whether these build out measures should apply to types of development that involve the building of other residential accommodation. This could include specialist housing, such as student accommodation, for example. As part of our consideration of whether these other types of developments should be subject to the build out measures we will consider the significance of these types of developments in contributing towards delivering 1.5 million homes as well as any unintended consequences created by including certain types of development that involve the building of other residential accommodation.

Q.1. Do you agree that the build out reporting measures should apply to developments which involve the building of new dwellings (including mixed use development)?

Yes/no/don't know.

Q.2. Are there any other types of residential development that the build out measures should apply to? If yes, please give your reasons.

Yes/no/don't know. The provisions should apply to large commercial developments, as LPAs are assessed on the delivery of employment land as well as Housing. TMBC is assuming, although it is not spelt out anywhere, that these provisions would also apply to Gypsy and Traveller sites, given the importance placed on demonstrating delivery of that provision.

What threshold of development will the build out measures apply to

21. We need to define in the regulations the threshold for this development on a clear, objective basis. It is important that there are no grounds for dispute, and the definition does not encourage development just under the threshold to avoid the build out measures.

22. We also want to ensure that the build out measures are not a new burden for small to medium-sized enterprise (SME) builders. Accordingly, we propose to apply the measures only to residential developments with 50 or more dwellings. This means they will not apply to minor residential development or the types of smaller scale development predominantly build out by SME builders.

23. We think there is little merit in bringing this scale of residential development into scope of the build out measures as these will be intended to be built out quickly and it would be disproportionate to apply the build out measures to them. Applying the build out measures to residential development sites of more than 50 dwellings would mean that they would apply to approximately 10% of planning applications that deliver approximately 80% of housing supply.

24. It is envisaged that to secure greatest transparency across residential development, all the build out measures (build out statements, commencement notices, development progress reports and power to decline to determine applications) should apply to eligible residential development. This would create a clear threshold for where these measures would apply. However, bringing smaller scale developments into scope of the build out framework will increase the amount of information that will be prepared and submitted to LPAs, through the build out statements, commencement notices and development progress reports.

Q.3. Do you agree with the proposed threshold of 50 dwellings for the build out measures to apply to?

Yes/No/Don't know. Please give your reasons. Although TMBC accepts that sites with fewer than 50 dwellings account for a smaller proportion of housing supply, they can be particularly important in boroughs with a more rural character and reporting on them could also significantly enhance a Council's ability to accurately monitor delivery.

25. As an alternative to reduce the additional burden on developers and LPAs further, we could apply a higher threshold for submitting development progress reports and the power to decline to determine applications. This would reduce the amount of work that developers will need to undertake preparing development progress report and reduce the number of these reports being submitted to LPAs. However, it would limit the transparency of build out to larger developments. This would also reduce the amount applications that the power to decline to determine applications could be applied to as it would only apply to applications for eligible residential development above the threshold set.

Q.4. Do you think a higher threshold should be set for development progress reports and the power to decline to determine applications? If so what should this threshold be?

Yes/No/Don't know. Please give your reasons.

3. Build out statements

26. The first part of the build out reporting framework will be the preparation and submission of a build out statement which would accompany the planning application for the residential development.

27. This statement would set out the build out projection for the site, how diversification and tenure mix support this trajectory and issues that may influence this. This would ensure the LPA can consider the build out projections at the planning application stage and use them to measure progress against using the commencement notices and development progress reports.

28. The requirement for a build out statement would be set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015 as a national information requirement using powers under section 62 of the TCPA 1990.

Information required for build out statements

29. We propose the build out statement will need to set out the following information:

- the name and contact details of the person(s) intending to carry out the development that are known at the time of the planning application
- the build out projection for the site, including a trajectory for when housing development is expected to be started and completed by year and who is responsible
- the rationale for this projection including any site-specific constraints (such as infrastructure delivery) that may affect it
- information on the proposed housing tenure mix – including the expected proportion of market sales, affordable housing and other tenures such as Build to Rent
- a breakdown of how diversification and tenure mix support the build out trajectory and maximise absorption rates where appropriate
- any risks or issues known at the time of the planning application, that may influence the build out of the development, such as uncertainty about delivery of infrastructure on a site

30. The extent of the information required would vary on the scale of residential development, the build out statement for an outline planning permission application for a large, multi-phase development would be expected to provide significantly more information than an application for full planning permission for a single apartment block.

31. Much of this information is often already submitted with a planning application. A key benefit of the build out statement is to bring together this information in a clear and concise manner. Information that is not currently formally submitted as part of a planning application is likely to include a breakdown of how diversification and tenure mix, supports build out trajectory and maximises absorption rates where appropriate, and the risks that may influence the build out of the development. It is proposed that this information is included in the build out statements as it will be important information for LPAs to compare against the development progress reports and can be used as part of any assessment of whether the power to decline to determine applications is appropriate to use.

When a build out statement will be submitted

32. The build out statement would be required to be submitted by the applicant as part of the application for planning permission. Without it, the planning application would not be valid. (For outline permissions, the statement would be submitted as part of the outline permission application, rather than as a reserved matter approval application). For section 73 planning applications, build out statements would apply if the development has not yet begun.

33. The LPA would assess the statement as part of their consideration of the planning application, taking into account the anticipated build out rates for the development and information on how the development has maximised opportunities to diversify the type and tenure mix to ensure faster build out where appropriate. Our forthcoming consultation on national policies for decision making will set out clearer national policies for considering build out matters when determining applications.

34. If the planning permission is granted, we propose to encourage through guidance that a condition should be placed on the development requiring any changes to the projection set out in the build out statement to be submitted and approved with the LPA prior to the commencement of the development. This will help to ensure there is an up-to-date build out projection prior to commencement of the development. In addition, a statutory condition will also be placed on the eligible residential development to submit a development progress report annually (see the section on 'development progress reports' for more details). We will explore setting out model conditions on these working with the sector.

Q.5. Do you agree that this information should be covered in the build out statements?

Yes/No/Don't Know. If not, please explain why you disagree and set out any other information you think it should cover

Q.6. Do you have any further comments on the build out statement?

4. Commencement notices

35. The purpose of the commencement notice within the build out reporting framework is to provide a clear record that the residential development will commence, including details of the planning permission for the development. It is proposed that the notice will be submitted electronically in a standard format based on common data standards. This will help to ensure alignment with the government's broader drive to digitalise planning data. The notice will help to enrich the data available about planning permissions as it identifies those permissions which will commence.

What is in the LURA provisions

36. Section 111 of the LURA inserts new section 93G into the TCPA 1990. New section 93G makes provision for commencement notices. In summary:

- Commencement notices will be applicable where planning permission has been granted under section 70 or 73 of the TCPA 1990 for development of a description set out in regulations.
- The person[footnote 7] proposing to carry out this development must submit a commencement notice to the LPA to set out the date on which it is expected the development will begin.
- If the intended date for commencement changes following this, or the development is not commenced on the date given in the notice, a further commencement notice will need to be used to substitute a new date for the date previously given for commencement.
- The commencement notice will need to include information prescribed in the regulations. We have set out proposals on what this information will be in the information requirements section below.
- If it appears to the LPA that a person has failed to comply with any of the requirements then they can serve a notice requiring the information that is missing to be submitted. They will have 21 days to respond to the LPA from the date the notice was served. If they do not do this within the 21 days the person will be liable to a fine.
- LPAs must notify applicants of the commencement notice requirements and the consequence of non-compliance when granting planning permission.

Information required for commencement notices

37. It is proposed that the information the commencement notice will seek to collect will be limited to information about the development, planning permission and the date of commencement so that these notices can be quick to produce and easily updated and resubmitted if the commencement date changes.

38. It is proposed the commencement notice will require information on the following:

- the details of the planning permission which authorises the development which is about to be commenced, including the planning application reference number
- the intended commencement date for the development
- the date on which the development is expected to be substantially completed
- the expected date for the first application for reserved matter approval (if the development is authorised by an outline planning permission)
- the name and contact details of the person sending the notice
- the name and contact details of the person(s) carrying out the development
- the name and contact details of the owner(s) of the land
- a signed declaration confirming the contents of the notice and liability for any work or non-work taking place on the site
- details on whether the permission is an alternative or variation to a previously granted permission through Section 73

39. This information will ensure that there is greater transparency about when the site is commenced. It will give LPAs clear data and information about when development has commenced. This will be important for having a clearer picture of build out progress, as it will need to be clear when the development first commenced.

Q.7. Do you agree that this information should be covered in commencement notices?

Yes/No/Don't Know. If not, please explain why you disagree and set out any other information you think it should cover

5. Development progress reports

40. The purpose of the annual development progress report is to provide a clear statement from the developer of the residential development about progress building out the development. It will be the key document to track progress of the development.

What is in the LURA provisions

41. Section 114 of the LURA inserts new section 90B into the TCPA 1990. New section 90B makes provision for development progress reports. In summary:

- The new requirements on development progress reports will be applicable where relevant planning permission (as defined in section 90B(10)) is granted for relevant residential development in England. The requirements mean that relevant planning permission must be granted subject to a condition that a development progress report must be provided to the LPA for each reporting period.

- The first reporting period in relation to the development will be a 12-month period beginning at the time prescribed in regulations during which the development is begun. Each reporting period following the first reporting period (except for the last reporting period) will also be a period of 12 months and will begin immediately after the previous reporting period has ended. The last reporting period will be the period ending with the day on which the development is completed. Options for when this 12 month period will start and finish are set out in the next section.
- The development progress report will set out:
    - The progress that has been made, and that remains to be made, towards completing the dwellings that have been granted planning permission;
    - The progress which is predicted to be made towards completing the dwellings over each subsequent reporting period, up and including the last reporting period; and
    - Such other information as may be prescribed in regulations. This consultation document sets out proposals for what this information this will cover.
- Section 90B gives the Secretary of State power to make provision in regulations about how development progress reports will operate. Proposals for the provisions to be contained in these regulations are set out below.

42. As the development progress report is applied as a condition, where a developer does not comply with the condition, in this case submitting a development progress report within the time specified in regulations, they may be subject to enforcement action using powers under section 187A of the TCPA 1990.

What provisions are proposed for development progress reports as part of the regulations

43. Section 90B(3) provides for the start of the first reporting period to be specified in regulations, and, under section 90B(9), regulations may also make provision about when development progress reports are provided to LPAs (referred to in the consultation as submission). We propose to use the regulations to ensure there is a consistent approach to when reporting periods begin and when development progress reports are submitted enabling information from them to be aggregated. Similar information is often sought by LPAs from developers to inform their calculations on 5 year land supply (5YLS) and a consistent approach could help to ensure a consistent approach for the collection of this data.

44. Our lead option is to:

- prescribe an annual reporting period based on the financial year – that is to say, regulations would state the reporting period would start on 1 April and finish on 31 March; and
- require the submission for the development progress reports for this reporting period within 2 months of the end of this reporting period (31 May)

45. We have proposed this as the lead option to align with the financial year as this may have impacts on progress of development eg. any cost or funding issues.

46. An alternative approach would be to:

- prescribe an annual reporting period based on the calendar year – that is to say, regulations would state the reporting period would start on 1 January and finish on 31 December; and

- require the submission for the development progress reports for this reporting period within two months of the end of this reporting period (last day in the month of February)

47. Under both options, we recognise that developers will need to prepare and finalise the report and this could create additional work for them. We have therefore proposed a 2-month period which aims to strikes a balance giving developers reasonable time to prepare the report and ensuring the information is timely and readily available. We would welcome views about whether it would be better to prepare the report in January/February or April/May.

48. Section 90B sets out that the last reporting period is the day ending with the day on which the development is completed. For the purposes of development progress reports, we propose to specify that the completion date will be the date when the dwellings on the site have been completed and an application for a completion certificate has been submitted in accordance with Building Regulations 2010.

49. As the reporting period runs annually, this means that a developer will need to submit a development progress report for the period covering time at which the development was completed. This means that if a development was completed in November 2027, under the first option of a reporting period to run annually from 1 April, the final progress report will need to be submitted by 31 May 2028.

Q.8. Do you agree with setting a 2 month period after the reporting period ends to submit the development progress reports?

Yes/No/Don't Know. If not, please explain why you disagree.

Q.9. Which option for the reporting period for development progress reports do you agree with?

Financial years

Q.10. We recognise the information in development progress reports may be useful for LPAs to calculate 5 year land supply (5YLS), are there any impacts with the reporting periods proposed and the interaction with 5YLS?

Q.11. Do you agree with the proposals for how the completion date is specified for the purposes of development progress reports?

Yes/No/Don't Know. If not, please explain why you disagree.

50. For development progress reports for developments being built out by a single developer it is proposed that the person[footnote 8] responsible for submitting the report will be the person carrying out the development during the relevant reporting period. This is because they will be best placed to have access to the relevant information to include the development progress report. In most cases (unless there has been a change of developer), this person will be the same as the person who provided the commencement notice. For sites where multiple developers are involved, there are options as to how they discharge responsibility for submitting the development progress report. More details are set out in the section below on 'sites where multiple developers are building out'.

Q.12. Do you agree with the proposals about who submits the development progress report?

Yes/No/Don't Know. If not, please explain why you disagree.

Information required as part of the development progress reports

51. We propose the information the development progress report will seek to collect will be more detailed information on progress of build out annually against the projections set out in the build out statement. In addition to the information Section 90B already makes provisions for as set out in the section above, we propose to prescribe in regulations other information that development progress reports must cover including information about how the development has progressed since commencement with comparison against the projections set out in the building out statement. Where this has been slower than predicted, we propose to require information to be given as to why there have been delays.

52. We also propose that details on any changes in housing tenure during the development's build out is reflected in the development progress reports, for example any changes in affordable housing.

53. Taking this into account, it is proposed that the development progress reports would require information to be submitted on the following:

- relevant information in relation to the planning application eg. application number the development relates to
- a description of development that has taken place on site during the reporting period
- the number of dwellings started and completed by the development in the previous year
- the reasons for any delays against previous trajectories set out in the build out statement and any previous development progress reports
- the number of dwellings due to start in the year ahead
- the proposed trajectory for the build out for the rest of the development
- the tenure breakdown including the number of affordable units delivered and to be delivered
- details on any changes in housing tenure during the build out in the last year
- identify any potential risks to the delivery targets, for example infrastructure delivery and strategies to overcome them

54. It will be important for this information to be set out in the development progress reports as LPAs will need to use this information to compare against the build out statement and any other development progress reports submitted in order to assess whether the power to decline to determine applications is appropriate to use. Having this information submitted annually will give LPAs clear information about the progress of the site and whether any delays are occurring when compared against the build out statement trajectory. This will help LPAs to track progress of sites, and if delays are happening, what the reasons are for these delays. It will also give LPAs a real time picture of housing delivery and any changes to housing tenure and mix on the site. Furthermore, having this information on a consistent basis will enable information on individual sites to be analysed on an aggregate basis both locally and nationally.

Q.13. Do you agree with the information it is proposed development progress reports will cover?

Yes/No/Don't Know. If not, please explain why you disagree.

Q.14. Is there any other information you think development progress reports should cover? No

6. Sites with multiple developers building out

55. We recognise that the build out reporting framework will be more complex for development where multiple developers are involved in its build out, especially larger developments. We want to engage further with the sector on how the framework can be tailored for these circumstances.

56. For build out statements, as outlined in the section above, the person responsible for the planning application will be responsible for submitting the statement. Where multiple developers are involved it will be important for the build out statement to provide information about whether it is expected that the site will be built out by more than one developer. The statement will need to provide information known at the time of application about the developers involved and who is responsible for building out different phases or sections of the site. We expect that it will be standard practice where multiple developers are involved for the applicant to agree with the developers involved what is submitted as part of the application.

57. Section 93G of the TCPA 1990 requires any person proposing to carry out development to give a commencement notice (if the development has not commenced). We would welcome views on how joint submission of a commencement notice could be facilitated where multiple persons are carrying out the development of a site.

Q.15. Do you have any views on how a joint approach to submitting a commencement notice could be facilitated on sites where multiple developers are involved?

In order to ensure that LPAs are able to effectively monitor, there should be a requirement that single point of contact is agreed amongst multiple development parties to submit one set of documentation.

58. For development progress reports the Secretary of State may make provisions in regulations about who is responsible for submitting development progress reports to the LPA and how this should be done. Therefore we propose to include provisions in the regulations that would specify that each developer must submit a report; but this can be done individually or jointly, where it is efficient to do so. We would welcome views on how joint submission of a development progress report could be facilitated where multiple persons are carrying out the development of a site.

Q.16. Do you agree with making provisions in the regulations that would enable a joint submission of the development progress report where multiple developers are involved?

Yes/No/Don't Know. If not, please explain why you disagree.

59. For developments where multiple developers are involved and they agree to do a joint submission, additional information will be required in the development progress reports in order to identify progress by different developers. This will be important as it is proposed that development progress reports will be a key information source for assessing whether the power to decline to determine applications may be used by LPAs. It will therefore be important that individual developers progress can be identified so that in any scenario where the power to decline to determine applications is being used, developers are not unfairly penalised where they may have been involved in the build out of a multi-developer site where one developer was responsible for delays. It is proposed that different development progress report templates are provided for different circumstances, where either a joint or individual approach is taken.

60. The information that individual developers will need to submit if they are doing individual progress reports is set out above. In addition to this information, where a joint approach is taken it is proposed that the development progress report will also need to include the following information:

- details of which developers are carrying out different parts of the work
- details of progress each developer has made compared to what was proposed in the build out statement
- any reasons for delay to build out of the site and which developer or developers are involved

Q.17. Do you agree that this information should be covered in development progress reports where a joint approach is taken?

Yes/No/Don't Know. If not, please explain why you disagree and set out any other information you think it should cover

7. Power to decline to determine applications

61. The power to decline to determine applications for planning permission will be a new power LPAs can use where any person[footnote 9], who fails to build out development authorised by an earlier planning permission at a reasonable rate, makes a new application. The build out reporting framework will improve the transparency of build out and will help provide LPAs with the information they need to assess whether the power to decline to determine should be used.

What is in the LURA provisions

62. Section 113 of the LURA makes provision for a new section 70D in the TCPA 1990 which sets out a new power for LPAs to decline to determine applications for planning permission where the carrying out of development authorised by an earlier planning permission anywhere in that LPA's area has not taken place at a satisfactory pace. In summary:

- LPAs will be able to use the new power to decline to determine an application for planning permission for a development of any land if:
    - The development is development that meets certain criteria set out in regulations which this consultation seeks views on.
    - The application is made by a person who has previously made an application for planning permission for development in the LPA's area at the time the current application is made – known as the 'earlier application', or a person who has a connection of a description set out in this consultation document with the development to which the earlier application related known as the 'earlier development'.
    - The earlier development was of a description that meets the same criteria as set out in point one above.
    - If the earlier development has not begun or if the earlier development has begun but has not been substantially completed and the LPA is of the opinion that the carrying out of the earlier development has been unreasonably slow.
- When considering whether the earlier development has been unreasonably slow, the LPA must have regard to all the circumstances including:
    - Where a commencement notice has been given, whether the development was begun by the date specified in the notice and was carried out in accordance with any timescales specified in it.

- Any other prescribed circumstances (which this consultation sets out proposals for).

- Where a person applies for planning permission a LPA may by notice require the person to provide information for the purposes of its function in determining whether the power to decline to determine the application should apply.

- If a person does not comply with this notice within 21 days the LPA may decline to determine the application. If a person gives a statement responding to the notice which they know to be false or misleading then they may be subject to a fine.

How the power to decline to determine applications will apply

63. The power to decline to determine applications for determination covers both the person who submits an application for an earlier development which was considered unreasonably slow and a connected person[footnote 10] to that development. We intend to define a connected person to include a person who carried out the development (but who did not submit the planning application) - for instance if the land was sold onto the person after securing of planning permission. We also want to ensure that separate corporate entities within a development group are adequately covered so, if a corporate body under the control of a development group is submitting an application, this could be declined if another corporate body under the control of the development group carried out an earlier development which was considered unreasonably slow.

64. Section 70D sets out that when assessing whether the carrying out of the earlier development has been unreasonably slow the LPA must have regard to all circumstances. These include whether the development was begun by the date specified in the commencement notice and was carried out in accordance with any timescales specified in it. In addition to this it is proposed that the regulations will also specify that the LPA must have regard to any build out statements and development progress reports when considering whether the carrying out of the earlier development was unreasonably slow, enabling reasons for delays to be taken into account. The information included in the build out statements will be important information for LPAs to compare against the development progress reports and can be used as part of any assessment of whether the power to decline to determine applications is appropriate to use.

Q.18. Do you have any views on what information other than in build out statements and development progress reports LPAs should have regard to when considering whether the carrying out of the earlier development has been unreasonably slow?

Changes to land ownership or options during the reporting period

Please give your reasons.

65. Factors such as reasons for delays to build out, location of development, size of development and the progress of delivery of other infrastructure provisions on the site could all be relevant to considering whether the build out of a site is being undertaken at a reasonable rate. We do not think it would be helpful to provide prescriptive guidance on this matter as it would undermine LPAs' ability to make a local judgement based on the individual circumstances of the case. However, we would welcome views about whether guidance should have a role in promoting common approaches across LPAs, for example setting out case studies.

Q.19. Do you have any comments on the scope of the guidance? The consultation does not consider fully how this process would be managed in Local Planning Authorities or what summary monitoring

requirements will be placed on them as a result of this proposal. That is an important consideration to ensure that LPAs can administer this important process.

8. Next steps

66. Implementation of the build out measures will involve:

- preparation of the regulations for the these build out measures reflecting the outcome of this consultation and
- the development of forms for build out statements, commencement notices and development progress reports that meet data standards and can be submitted electronically to ensure the process is administratively straightforward and not burdensome for either developers or LPAs

Preparation of regulations

67. Subject to the outcome of the consultation, the intention is to bring forward the regulations to implement the build out measures as soon as practicably possible, with the new build out reporting framework applying from 2026.

68. These regulations will be laid in Parliament and will be subject to Parliamentary scrutiny. As part of preparing the regulations, we will undertake an Impact Assessment.

69. We will also undertake further engagement with stakeholders during the consultation period to inform the development of these proposals.

Process for submitting the new build out information requirements

70. MHCLG's Digital Planning Programme has been working to improve the availability and accessibility of planning data to aid decision making and create more efficient planning processes. To ensure these new requirements work effectively, aligning with the government's wider digitisation of the planning system, it is intended that the forms for build out statements, commencement notices and development progress reports are underpinned by data standards. This will make the process as simple as possible for completing the requirements, as well as ensuring the data submitted meets data standards.

71. By submitting the build out statements, commencement notices and development progress reports electronically according to set data standards will result in a process which results in less uncertainty in relation to what information needs to be provided and less manual work for the entry of data into LPAs systems. Information about these documents will be included in the planning register and will be publicly available. This will mean that LPAs will be able to easily track submission of commencement notices for applications that have been approved to give a clear picture of which developments have commenced and which have not. It will also mean LPAs will be able to track progress of developments from the annual submission of development progress reports against the build out trajectory agreed at the planning application stage in the build out statement.

When the new requirements will come into effect

72. The government will set a date for when each of the build out measures will come into force. This date will be included in regulations. The build out reporting framework will not apply to existing development which is already commenced.

Other work on build out

73. We will need to publish guidance alongside the regulations for these new build out measures. This guidance will cover detail on how these new requirements will work as part of the planning process, and specific guidance on how they should be applied for different types of development, for example where multiple developers are involved.

74. We are also considering other measures that would work alongside these new build out requirements. As part of the consultation on the national policies for decision making we will consider ways to maximise the effectiveness of these new build out requirements by looking at options for stronger national policies on build out, including aligning with the proposals in this consultation on build out statements. Over the course of the year we will set out more information on the national policies for decision making.

75. In addition the government is inviting views in the speeding up build out working paper on options to ensure the right incentives exist in the housing market, and local planning authorities have the tools they need, to encourage homes to be build out quickly. This includes incentivising and supporting models of development that build out faster as well as giving local authorities the ability as a backstop to charge a new 'Delayed Homes Penalty' when development falls materially behind pre-agreed build out schedules, which will link to the transparency and accountability measures set out in this consultation document.

9. Public Sector Equality Duty, Environmental Principles and Impact Assessment

76. We would like to hear about any potential impacts of any of the proposals in the consultation on businesses, LPAs communities, and the environment or of any differential impacts on persons with a relevant protected characteristic as defined by the Equalities Act 2010 compared to persons without that protected characteristic, together with any appropriate mitigation measures, which may assist in deciding the final policy approach in due course.

Q.20. Do you have any views on the implications of the proposals in this consultation for you, the environment or the group or business you represent, and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how, or any anticipated environmental impacts. Is there anything that could be done to mitigate any impact identified? No

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1. Subject to the outcomes of the proposals in this consultation on the different thresholds the build out measures apply to. ↩
2. The use of the term developer in this consultation is shorthand. As explained in each section, who is responsible for the discharge of each requirement will vary depending on the planning and development cycle stage. ↩
3. Housebuilding market study final report - GOV.UK ↩
4. Independent review of build out: final report - GOV.UK ↩
5. Start to Finish 3: How quickly do large-scale housing sites deliver? ↩
6. The use of the term developer in this consultation is shorthand. As explained in each section, who is responsible for the discharge of each requirement will vary depending on the planning and development cycle stage. ↩

7. This is included in the shorthand term ‘developer’ that is used throughout this document. ↩
8. This is included in the shorthand term ‘developer’ that is used throughout this document. ↩
9. This is included in the shorthand term ‘developer’ that is used throughout this document. ↩
10. This is included in the shorthand term ‘developer’ in the context of the power to decline to determine applications. ↩

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Reform of planning committees: technical consultation

The consultation period runs for 8 weeks from 28 May 2025.

Introduction

1. Planning is principally a local activity, because decisions about what to build and where should be shaped by local communities and reflect the views of local residents. That is why the government is determined to ensure every area has an up-to-date local plan developed through significant resident engagement, and it is why the government believes that planning committees have an integral role in providing local democratic oversight of planning decisions. It is however vital that in exercising that democratic oversight, planning committees operate as effectively as possible, focusing on those applications which require member input and not revisiting the same decisions.

2. In the King's Speech, the government announced that it would modernise the way planning committees operate to best deliver for communities and support much needed development. In December 2024, we published Planning Reform Working Paper - Modernising Planning Committees to seek views on 3 proposed actions to reform planning committees:

- introducing a national scheme of delegation so there is greater consistency and certainty about which decisions go to committee;
- requiring separate, smaller committees for strategic development so there is more professional consideration of key developments; and
- introducing a requirement for mandatory training for all planning committee members so they are more informed about key planning principles.

3. Through embarking on these reforms, and as expressed in our working paper, we want to encourage better quality development that is aligned with local development plans, facilitates the speedy delivery of the quality homes and places that our communities need, and gives applicants the reassurance that in more instances their application will be considered by professional officers and determined in a timely manner. This will allow committees and the elected representatives that sit on them to focus their resources on those applications where local democratic oversight is required.

4. Our objectives for these reforms are to:

a) encourage developers to submit good quality applications which are compliant with plan policies;

b) allow planning committees to focus their resources on complex or contentious development where local democratic oversight is required and a balanced planning judgement is made;

c) ensure planning committee members get the training and support they need to fulfil their duties effectively; and

d) empower planning professionals to make sound planning decisions on those cases aligned with the development plan.

5. As part of our engagement on the working paper we held 8 workshops and meetings with key stakeholders including local planning authorities and chairs of planning committees. We also received over 160 written responses to the working paper. Independently, the Planning Advisory Service undertook a survey on planning committees which attracted over 130 responses. The findings of that survey can be found on its website at Modernising Planning Committees National Survey 2025.

6. This engagement following the publication of the working paper provided us with invaluable insight from those working across the sector as well as views from the general public. Our workshops, facilitated by the Planning Advisory Service, gave us access to a cross section of planning authorities from across the country, including districts, unitaries and counties. We also met with council members, chairs and vice chairs of planning committees and networks representing the development industry and local government. These sessions along with the written responses to the working paper indicated a broad consensus that, while local democratic accountability of planning decisions is important, the decision making of planning committees can be improved significantly and that government intervention would help to drive up performance. The key findings were:

- most respondents could see the case for a scheme of delegation to provide more consistency and certainty, but there were differing views about the structure of such a scheme;
- there was little support for separate strategic development committees, however, there was strong support for smaller committees generally to improve the quality of debate;
- there was strong support for mandatory training of planning committee members to improve their understanding of planning.

7. After careful consideration of the responses, the government has included the following measures in the Planning and Infrastructure Bill which was introduced into Parliament on 11 March 2025:

- a new power for the Secretary of State to set out which planning functions should be delegated to planning officers for a decision and which should instead go to a planning committee or sub-committee;
- a new power for the Secretary of State to control the size and composition of planning committees; and
- a new requirement for members of planning committees to be trained, and certified, in key elements of planning.

8. The measures in the Bill are enabling powers and the detailed provisions will be set out in regulations to be brought forward following Royal Assent for the Bill. This consultation seeks views on what detailed provisions should be included in the regulations.

9. The Bill measures relate to a local planning authority's development management functions. Schedule 1 of the Local Authorities (Functions and Responsibilities) (England) Regulations 2000 sets out a list of such planning functions which must be non-executive (and therefore usually fall under the responsibility of the planning committee). There are however a number of omissions to this Schedule and we intend to update it as part of these reforms. We recognise that some planning committees may discharge certain plan making functions (e.g. the approval of supplementary planning documents) which fall under Schedule 3 of the regulations which covers functions which must not be the sole responsibility of the executive. We do not intend to regulate these functions.

10. These reforms apply to England only.

11. These reforms will not affect the statutory framework for the ability of members of the public to make representations on planning applications. Local planning authorities must still consult and consider representations when determining planning applications regardless of whether the decision is made by committees or officers.

2. Delegation of planning functions

12. The Planning and Infrastructure Bill will, subject to parliamentary approval, give the Secretary of State the power, through regulations, to set out which planning functions should be delegated to planning officers for a decision and which should go instead to a planning committee or subcommittee[footnote 1].

13. It is currently the case that all local planning authorities have their own scheme of delegation, but these vary widely across the country with a lack of consistency on the types of applications going to committee. In particular we see some committees unnecessarily considering large numbers of applications consisting of largely minor and technical details. This creates uncertainty and confusion for applicants, particularly those businesses and developers who deal with local planning authorities across the country. We are seeking to change this approach and build on the good practice of many councils in introducing a national scheme of delegation.

14. The measure is intended to ensure that planning committees can work as effectively as possible and focus on those applications for complex or contentious development where local democratic oversight is required. It is also intended to give greater clarity and consistency about who in a local planning authority will make planning decisions.

15. While the responses to the working paper indicated broad support for greater clarity and consistency on the delegation of planning functions, there were differing views on the structure of such a scheme. The key points were:

- many respondents were concerned about it creating new legal risks, being inflexible to deal with local circumstances, and leading inadvertently to more applications going to committee;
- concern that there would be reduced political oversight of locally important applications;
- the option of a scheme based on compliance with the development plan was felt to be too subjective and would not therefore achieve the objective of providing greater certainty;
- there was strong support to remove objection-based delegation criteria on the basis that they artificially encourage objections, lead to non-planning based decisions and create delays to otherwise acceptable development.

16. Having taken account of the responses, the government is proposing to introduce a scheme of delegation which categorises planning applications into two tiers:

- **Tier A** which would include types of applications which must be delegated to officers in all cases; and
- **Tier B** which would include types of applications which must be delegated to officers unless the Chief Planner and Chair of Committee agree it should go to Committee based on a gateway test.

17. The principle of a two-tier categorisation reflects common practice in existing schemes of delegation operated by individual local planning authorities. We think it is appropriate to have this triage process to ensure the scheme of delegation can operate in all areas and for varying scales and types of development. Large unitary authorities will deal with a significantly higher number of applications than smaller district authorities, and county councils deal with different types of application and we need to ensure that there remains an opportunity for locally important schemes to have appropriate democratic oversight. This approach will replace the many different approaches

across the country, including where individual councillors can call in any application to be considered by committee.

18. We have proposed a power in the Planning and Infrastructure Bill to publish statutory guidance to support local planning authorities in implementing the regulations on the scheme of delegation.

Question 1: Do you agree with the principle of having a two-tier structure for the national scheme of delegation?

In principle, this approach achieves the shared aim of streamlining decision making in Planning and giving more certainty on timescales for smaller applications, albeit this is only able to be the case where Local Planning Authorities are able to properly resource themselves and therefore TMBC eagerly awaits the proposed approach to locally set planning fees being published.

Our Members have some concerns about the immediately local impact that some minor residential development can inevitably have on communities and their ability to engage in the planning process in those instances given that this type of development would not be referrable to planning committee. Whilst TMBC is adept at seeking ways to engage with elected members throughout the Planning process, some best practice guidance on this to ensure consistency would be welcomed.

The blanket inclusion of reserved matter approvals in Tier A is also a source of concern, given the need to ensure that principles set at outline application stage become reality during delivery. An alternative could be that reserved matter approvals for major residential development could be part of Tier B, allowing for that 'gateway check' to be undertaken.

The potential creation of a medium development category that is being proposed in a separate technical discussion paper would give greater scope for delegation whilst retaining the ability for Members to become involved in more significant schemes.

Tier A applications (must be delegated in all cases)

19. In all cases Tier A applications must be delegated to officers. We think that these types of applications should generally be technical in matter, or about minor developments. These types of applications consist of the majority of applications, where a very high proportion would be delegated to officers under the current system – however there are examples of all types being considered by committees.

20. We propose the following types of applications would be in Tier A. This is in recognition that they are either about technical matters beyond the principle of the development or about minor developments which are best handled by professional planning officers:

- applications for planning permission for:
    - Householder development
    - Minor commercial development
    - Minor residential development
- applications for reserved matter approvals
- applications for s96A non-material amendments to planning permissions
- applications for the approval of conditions

- applications for approval of the BNG Plan
- applications for approval of prior approval (for permitted development rights)
- applications for Lawful Development Certificates
- applications for a Certificate of Appropriate Alternative Development

21. The definition of minor residential development above covers, broadly, residential development for up to 9 dwellings. We are exploring the idea of creating a new category of medium residential development which could cover developments between 10 and 50 dwellings and we have published a working paper on this. Our intention is not to include all applications for medium residential development in Tier A. We recognise that the inclusion of these applications within Tier A would mean very few residential development applications in some areas could be scrutinised by committee.

22. However, we are keen for views whether there are certain circumstances where medium residential developments could be included in Tier A. For instance, given the scale and nature of residential development in large conurbations such as London, we could specify medium residential development in these conurbations should be included in Tier A (as well as minor residential development), while in other areas, only minor residential development would fall within Tier A.

Question 2: Do you agree the following application types should fall within Tier A?

- applications for planning permission for:
- Householder development
- Minor commercial development
- Minor residential development
- applications for reserved matter approvals
- applications for non-material amendments to planning permissions
- applications for the approval of conditions including Schedule 5 mineral planning conditions
- applications for approval of the BNG Plan
- applications for approval of prior approval (for permitted development rights)
- applications for lawful development certificates
- applications for a Certificate of Appropriate Alternative Development

Yes, with the exception of reserved matter approvals for major residential development, using the new proposed development categories.

Question 3: Do you think, further to the working paper on revising development thresholds, we should consider including some applications for medium residential development (10-50 dwellings) within Tier A? If so, what types of application?

In smaller LPA areas, medium residential development should be in Tier B. However, it is understood that including these applications in Tier A in larger LPA areas would likely be preferable. Further clarity on how the definition for a 'larger LPA' would be useful in this regard. This could perhaps be based on the metric of percentage of applications falling into this category.

Question 4: Are there further types of application which should fall within Tier A?

None

Question 5: Do you think there should be a mechanism to bring a Tier A application to committee in exceptional circumstances? If so, what would those circumstances be and how would the mechanism operate?

There should always be an exceptional circumstances option, however this would have to be applied consistently. Those circumstances could include extreme potential impacts in an immediately local area. There should be proposed wording for such a provision that LPAs are able to include in their constitution.

Tier B applications

23. The starting point for Tier B is that all applications should be delegated to officers, subject to a gateway test through which the chief planning officer (or equivalent officer in LPAs without a chief planning officer) and chair of planning committee must mutually agree that they should go to committee if they are to depart from the assumed delegation.

24. In many instances, for example, applications for large-scale development that would have a lasting impact on the community, it will be self-evident that an application would benefit from democratic debate and scrutiny by way of committee. For other applications it may not be so clear and we consider that the triage process will be an effective tool to ensure that planning committee members are able to spend appropriate time on development that most impacts their communities. It will also ensure that objections which are not based on planning matters can be handled appropriately and not automatically trigger committee consideration as is the case in a number of areas.

25. We propose that the following types of applications should be in Tier B in recognition that it may be appropriate, in some circumstances, for these applications to be subject to committee scrutiny.

Type of decision	**Rationale**
Applications for planning permission not in Tier A	Planning permission is the key consent and there will be examples of applications in most categories of different development where committee scrutiny is warranted as the issue will be about the principle of development. This will include all significant new housing and commercial developments. It will enable controversial or complex applications to be considered by committee.
Notwithstanding Tier A, any application for planning permission where the applicant is the local authority, a councillor or officer	This type of application is included to ensure that there can be open scrutiny of applications closely linked to the local authority itself.
Section 73 applications to vary conditions	This type of application is included as, although there will be many instances where officers should consider the variation, there will be some applications

Type of decision	Rationale
	which would alert the principle of development which require committee scrutiny. Significant changes to mineral developments are, for instance, made through section 73 applications[footnote 2].
Review of mineral planning conditions	Certain categories of mineral sites are subject to a review of their conditions to ensure these are still.

26. We are also interested in whether we should set criteria by which decisions to take applications to committee should be considered. In triaging applications in Tier B, the following options could apply:

- where the application raises an economic, social or environmental issue of significance to the local area
- where the application raises a significant planning matter having regard to the development plan

Question 6: Do you think the gateway test which requires agreement between the chief planner and the chair of the planning committee is suitable? If not, what other mechanism would you suggest?

Yes, a gateway test is a suitable mechanism. However, it is unclear from the consultation whether this would be a nationally or locally decided approach. Given that the Local Government Act 1972 does not allow functions to be delegated to a single member, our assumption is that the gateway would need to be delegated to the Chief Planner in consultation with the Planning Committee Chair? Provision needs to be made to determine who will make the final decision about referring an application to Committee in the event that the Chief Planner and Chair of the Planning Committee are unable to agree.

Question 7: Do you agree that the following types of application should fall within Tier B?

a) Applications for planning permission aside from:

- Householder applications
- Minor commercial applications
- Minor residential development applications

b) notwithstanding a), any application for planning permission where the applicant is the local authority, a councillor or officer

c) applications for s73 applications to vary conditions/s73B applications to vary permissions

Yes, where the original application would have fallen into this tier.

Question 8: Are there further types of application which should fall within Tier B?

As above, TMBC considers that reserved matter approvals for applications that would generally fall into Tier B should be included in this tier also.

Special control applications

27. We would welcome views on whether special control applications (e.g. relating to tree preservation orders, listed building consent, advertisement control) should fall within Tier A or Tier B. In most cases these applications can – and do – get delegated to planning officers, but where they are sensitive or are linked to more substantive applications for planning permissions there may be a case for them to be considered at committee.

Question 9: Do you consider that special control applications should be included in:

- Tier A or
- Tier B?

Tier A

Section 106 and planning enforcement

28. Section 106 functions are not executive functions and therefore fall into the remit of planning committees. We propose that section 106 decisions should follow the treatment of its associated planning applications (for example where the application is in Tier A, so too should the exercise of judgement as to which section 106 obligations to require be delegated to officers).

29. Planning enforcement functions (including enforcement of section 106 obligations) are in practice largely delegated to officers however there are some large scale, high profile and locally contentious enforcement cases which may warrant additional democratic oversight through the planning committee.

Question 10: Do you think that all section 106 decisions should follow the treatment of the associated planning applications? For section 106 decisions not linked to a planning application should they be in Tier A or Tier B, or treated in some other way?

TMBC agrees with this approach. For 106 decisions not linked to a planning application, they should be in Tier A.

Question 11: Do you think that enforcement decisions should be in Tier A or Tier B, or treated in some other way?

Enforcement decisions should be dealt with in Tier A given the often technical and legal nature of those decisions. However, this is an area where the exceptional circumstances provision and the judgement of officers in consultation with Members is key, as some cases may warrant the oversight mentioned in para 29.

3. Size and composition of committees

30. The working paper sought views on whether it would be beneficial to introduce a requirement for local planning authorities to have smaller, dedicated committees to deal with strategic development applications.

31. Most respondents to the working paper felt that such a requirement was unnecessary as local planning authorities already had the power to form such committees and were doing so where it was needed. There was, however, strong support for having smaller committees generally to improve the quality of debate while recognising the need for political balance.

32. In light of the responses, the government does not intend to take a power to require strategic development committees at this time. We will instead use guidance to encourage local planning authorities to adopt such an approach where it would be beneficial.

33. We are, however, seeking a power in the Planning and Infrastructure Bill for the Secretary of State to set out requirements on the size and composition of committees[footnote 3].

34. Engagement and best practice indicate a committee of 8-11 members is optimal for informed debate on applications[footnote 4]. We recognise that there is a need for some local flexibility to take account of political balance requirements and meeting abstentions. We are therefore, proposing to set a maximum of 11 members in the regulations. We will use the statutory guidance to provide a steer on best practice so that 11 members does not unintentionally become to be seen as the requirement. Committees may be smaller if that works best locally.

Question 12: Do you agree that the regulations should set a maximum for planning committees of 11 members?

TMBC currently operates an area planning committee system, which enables all Members to be involved in planning decisions in their most immediate local area. This has some significant local benefits with regards to understanding of key issues, albeit the Council acknowledges that we are an outlier in this regard. The size of these committees is an acknowledged issue, in that their size can mean that in order for all Members to fully engage in debate can mean that meetings are lengthy. TMBC understands the drive for national consistency, but in principle our Members are opposed to these restrictions. Should they be mandated, the Council will comprehensively review how ward Members can continue to play an integral role in the determination of planning applications in their area.

Question 13: If you do not agree, what if any alternative size restrictions should be placed on committees?

TMBC Members consider that individual LPAs are best placed to determine how committee structures should operate to meet the needs of their community and in this case the development profile and pipeline of an area.

Question 14: Do you think the regulations should additionally set a minimum size requirement?

Any fewer than 7 Members on a committee would be too small to ensure that those Members could meet the requirements of their roles in a sustainable way. There would also need to be provisions for alternates in such circumstances.

4. Mandatory training for planning committee members

35. The government recognises that many local planning authorities in England already train their members, and there is good take-up of the membership training offered by the Planning Advisory Service. However, the approach to training is inconsistent and varies across the country. A recent survey by the Planning Advisory Service shows that 45% of respondents indicate they do not have a good understanding of planning and planning processes following a form of training, which indicates that there is scope for a more consistent and qualitative approach to training.

36. Our working paper therefore, sought views on introducing mandatory training for committee members. The proposal was strongly supported and we are taking this forward, subject to Parliamentary approval, in the Planning and Infrastructure Bill.

37. In terms of content, industry engagement showed broad support for a combination of national content (e.g. National Planning Policy Framework, other statutory guidance and regulations) and content driven by local context (including the local development plan). The local planning authority will have a role to play in the training process, as many do already. We will use best practices of these for further guidance.

38. Industry engagement was supportive of a hybrid form of training: a mixture of online and face-to-face elements to reflect committee members' circumstances. There was a strong emphasis on ensuring the training demystified planning jargon as far as possible, recognising that members have other responsibilities and are not expected to be planning experts.

39. We will work with local government and the wider planning sector to develop a national planning committee package which seeks to meet these ambitions following the outcome of the Spending review.

40. One key feature (which is incorporated into the Bill's provisions) is the need for a member to have some form of training certification to ensure they can only make committee decisions if they have been trained. There are two basic options:

- a national certification scheme which would be procured by MHCLG and involve an online test for certification; or
- a local based approach where the local planning authority provides certification

41. Our preference is for a national certification scheme as it ensures independence and reduces the burden on individual local planning authorities, however it is likely to mean that the certification is based on national content only. We are aware of different views on this matter and would like to hear views before developing the training package with the sector.

Question 15: Do you agree that certification of planning committee members, and of other relevant decisions makers, should be administered at a national level?

Yes, as this would ensure consistency. However, LPAs should also have the ability to add a proportionate local requirement to this, subject to approval by MHCLG.

5. Delegated decision making

42. Alongside our reforms to modernise planning committees we are committed to ensuring that delegated decision making is effective and as consistent as possible across the country. That is why we are taking steps to:

- introduce an overhaul of the local plans system to ensure that each area has an up to date local plan in place, making them simpler to understand and use so that communities can more easily shape them and will allow for an easier application of local plans to decision making
- consult on a set of National Decision Making Policies and a revised National Planning Policy Framework later this year that will create a clearer policy framework for decision making
- to support skills and resourcing by empowering local planning authorities to set their own planning fees to cover costs of delivering a good planning applications service

43. We also have an existing framework to measure the decision making performance of local planning authorities. The planning performance regime covers decision making by both committees

and delegated officer, looking at quality of decision making by measuring the proportion of total decisions overturns at appeal (as well as speed of decision-making). As part of our work to modernise the planning system and ensure it is delivering the outcomes communities want, we could consider reviewing the thresholds in the performance regime to support high quality decision making across both committee and officer decisions.

Question 16: Do you think we should consider reviewing the thresholds for quality of decision making in the performance regime to ensure the highest standards of decision making are maintained?

Performance measures should be reviewed on a cyclical basis. However, with the level of change currently being injected into the planning system and given that the current measures seem to be enabling the Government to successfully monitor, TMBC would not support a review at this time.

Question 17: For quality of decision making the current threshold is 10% for major and non-major applications. We are proposing that in the future the threshold could be lowered to 5% for both. Do you agree?

See above.

6. Public Sector Equality Duty and Environmental Principles

44. We would like to hear about any potential impacts of the proposals in the consultation on businesses, or of any differential impacts on persons with a relevant protected characteristic as defined by the Equality Act 2010 compared to persons without that protected characteristic, together with any appropriate mitigation measures, which may assist in deciding the final policy approach in due course.

45. Similarly we would like to hear about any impacts identified under the 5 environmental principles set out in the Environment Act 2021.

Question 18: Do you have any views on the implications of the proposals in this consultation for you, or the group or business you represent, and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.

No

Question 19: Is there anything that could be done to mitigate any impact identified?

Question 20: Do you have any views on the implications of these proposals for the considerations of the 5 environmental principles identified in the Environment Act 2021?

No

7. Glossary

1.	Application for Householder Development	This refers to applications for planning permission for works or extensions to a single dwelling, such as extensions, loft conversions, or garden buildings.

2.	Application for Minor Commercial Development	These applications involve small-scale commercial projects, less than 1,000 square meters of floor space or a site of less than 1 hectare.
3.	Application for Minor Residential Development	This includes applications for small-scale residential projects less than 10 dwellings.
4.	Applications for Reserved Matter Approvals	These are applications submitted following an outline planning permission, where details such as layout, scale, appearance, access, and landscaping are provided for approval.
5.	Applications for s96A Non-Material Amendments to Planning Permissions	These applications are for minor changes to an existing planning permission that do not materially affect the permission, such as slight alterations to the design or layout.
6.	Applications for the Approval of Conditions	These are applications to discharge or comply with conditions attached to a planning permission, ensuring that specific requirements are met before development proceeds.
7.	Applications for Approval of the BNG Plan	These involve the approval of a Biodiversity Net Gain (BNG) Plan, which outlines measures to enhance biodiversity as part of a development project.
8.	Applications for Approval of Prior Approval (for Permitted Development Rights)	These applications are for developments that fall under permitted development rights but still require prior approval from the local planning authority for certain aspects, such as impact on transport or flooding.
9.	Applications for Lawful Development Certificates	These are applications to confirm that an existing or proposed use of land or development is lawful and does not require planning permission.
10.	Applications for a Certificate of Appropriate Alternative Development	These certificates are issued to confirm that alternative development would have been appropriate for land that is subject to compulsory purchase.
11.	Applications for Section 73	These applications are to vary or remove conditions attached to an existing planning permission, allowing for changes to the approved development without submitting a new planning application.

1. Modernising Planning Committees National Survey 2025. ↩

Housing and Planning Scrutiny Select Committee

15 July 2025

Part 1 - Public

Matters for Information

Cabinet Member	Councillor Mike Taylor – Cabinet Member for Planning
Responsible Officer	Eleanor Hoyle – Director of Planning, Housing & Environmental Health
Report Author	Hannah Parker – Development Manager

Procedure on Amendments to Planning including Reserved Matters Applications - Update

1 Summary and Purpose of Report

1.1 The procedure for making amendments was formally implemented following Cabinet approval on 7 January 2025. As part of this process, it was agreed that an update report would be brought to the Housing and Planning Scrutiny Select Committee (HPSSC) after six months to provide an overview of progress and any emerging issues.

2 Corporate Strategy Priority Area

2.1 Efficient services for all our residents, maintaining an effective council.

3 Recommendations

3.1 This report is for noting only

4 Introduction and Background

4.1 Consideration was given by the Housing and Planning Scrutiny Select Committee (HPSSC) and Cabinet to the proposal to replace the existing non-amendments Policy with a new procedure for handling amendments to planning applications

4.2 Following the request of the HPSSC at its meeting on 3 December 2024**,** the Cabinet Member for Planning consulted with Officers on the proposed changes suggested at the Committee.

4.3 While Cabinet supported the amendments, on the basis that Planning Committees do not have the authority to compel applicants to make amendments**,** it was

proposed by Cllr Boughton and seconded by Cllr Taylor that the following revision be made:

Minor amendments will be encouraged following a deferral at an Area Planning Committee, particularly where Members have articulated clear reasons for the deferral.

4.4 Accordingly, subject to the updated wording revised procedures were approved for adoption.

4.5 The published version of when amendments can be accepted is outlined on the website at View and comment on planning applications – Tonbridge and Malling Borough Council . However, key to this report is the section on when amendments will be accepted without Planning Performance Agreement (PPA). The procedure is outlined below:

- The starting point for discussing a proposed application with the council should be via the pre-application service. This will enable full discussion of the merits of the scheme and enable detailed feedback from the council on what amendments may be required prior to submission.
- Amendments to a submitted scheme will only be accepted by the case officer's invitation and is entirely at their discretion. The council is not obliged to accept amendments to live planning applications.
- Amendments will only be invited if the case officer is of the opinion that the changes are minor, and will add value to the scheme, particularly in respect of design improvements, or changes that would lessen the impact of the development, including in respect of neighbouring amenity, traffic or highways, trees or other ecological designations. This list is not exhaustive and is at the discretion of the case officer.
- Major amendments that involve a full redesign of a scheme will not be accepted. Whether an amendment is major or minor in scale is a judgement for the case officer.
- Case officers will use their judgement to determine whether the amendments will require a further consultation.
- When amendments are accepted this should be within the statutory time period, if possible, to allow for timely consideration and determination. Where amendments will need further time, their invitation will be conditional on the applicant agreeing to a sufficient extension of time.
- The description of development must remain the same.
- Only one set of amendments will be accepted per application
- Corrections to drawings will be accepted.
- Minor amendments will be encouraged following a deferral at an Area Planning Committee, especially on the grounds articulated by Members for a deferral.

4.6 **Committee use of amendment procedure:** The amended procedure has, to date, been applied at one Planning Committee meeting. During that meeting, Members considered a proposed change in external materials, from a metal roof with power coated aluminium framed windows to a brick exterior with white painted timber fenestration.

4.7 At the time of writing this report, the applicant has agreed to revise the design in line with Member preferences. The amended scheme is currently undergoing the required public consultation process.

4.8 The Planning Committee were satisfied with the overall scale of the development and its set-back from the street and confirmed that their concerns related solely to the proposed materials. Planning officers advised that the amendment could reasonably be considered minor in nature, however, formal consultation was still necessary to ensure compliance with legislation.

4.9 Officers also provided an explanation of the risks associated with non-determination, ensuring that Members were fully aware of the potential implications of delay in the decision-making process.

4.10 **Officer's view of amendment procedure**: Officers are, overall, supportive of the amended procedure, as it provides greater discretion to secure improvements to development schemes where appropriate. This flexibility enables the planning authority to work constructively with applicants to enhance the quality of proposals without requiring full resubmissions.

4.11 Encouragingly, there have been no reported instances to date of agents or applicants raising concerns about inconsistency in the application of the procedure. This suggests that the approach has been understood and accepted positively.

4.12 It is, however, too early to draw firm conclusions about the impact of the procedure on pre-application income. As Members are aware, staff capacity constraints over the past six months have affected the timely allocation and progression of pre-application requests. That said, staffing levels have now improved, allowing the Council to offer a more comprehensive and responsive pre-application service, which remains a valuable and advantageous part of the planning process.

4.13 Importantly, the discretionary nature of the amendment procedure means that officers are not obliged to accept all proposed changes. Significant or major amendments continue to be excluded from the process, ensuring that such proposals are appropriately channelled through formal pre-application discussions. This safeguards the role and value of the pre-application service for more complex or substantive revisions.

4.14 Similarly, it is too early to assess any impact on income from Planning Performance Agreements (PPAs). These typically relate to larger, strategic schemes, which often involve wide-ranging amendments that would fall outside the scope of this minor amendment procedure.

4.15 It remains important that the implementation of the procedure is monitored in accordance with national guidance and in light of any potential future changes to

planning policy or legislation. A further report to this Committee would only be considered necessary if there is clear evidence that the policy is not achieving its intended objectives or is generating unintended negative consequences.

5 Other Options

5.1 There is no proposal or other options for this report as it is purely for information and noting

6 Financial and Value for Money Considerations

6.1 None – this report is for information only

7 Risk Assessment

7.1 None – this report is for information only

8 Legal Implications

8.1 None – this report is for information only

9 Consultation and Communications

9.1 None – this report is for information only

10 Implementation

10.1 None – this report is for information only

11 Cross Cutting Issues

11.1 Climate Change and Biodiversity

11.1.1 Climate change advice has not been sought in the preparation of the options and recommendations in this report.

11.2 Equalities and Diversity

11.2.1 The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no perceived impact on end users.

11.3 Other If Relevant

- None

Housing and Planning Scrutiny Select Committee

15 July 2025

Part 1 - Public

Matters for Information

www.tmbc.gov.uk

Cabinet Member:	Councillor Mike Taylor – Cabinet Member for Planning
Responsible Officer:	Eleanor Hoyle – Director of Planning, Housing and Environmental Health
Report Author:	Edward Jones – Tree and Landscape Officer

Offences under the Tree Preservation Legislation

1 Summary and Purpose of Report

1.1 This report sets out to provide an overview of offences under tree preservation legislation, including the classification of such offences, distinguishing between summary offences and those triable either way and the potential penalties arising from non-compliance. Additionally, the report includes information on the Felling Licence regime administered by the Forestry Commission, as well as the role of Kent Police's Wildlife Crime Unit in enforcing relevant legislation.

2 Corporate Strategy Priority Area

2.1 Efficient services for all our residents, maintaining an effective council.

3 Recommendations

3.1 This report is for information only

4 Introduction and Background

4.1 This report has been written at the request of Members to provide information about offences under the tree preservation legislation.

Tree Preservation Orders and tree protection in Conservation Areas

4.2 This report should be read alongside the Tree Preservation Orders Protocol and Tree Enforcement Protocol (both dated May 2024) and the Planning Enforcement Plan. All of these can be found on the Council's website.

4.3 A Tree Preservation Order (TPO) Is a Legal Order which provides statutory

protection to the trees, groups of trees, areas or woodlands specified within that Order.

4.4 In accordance with tree preservation legislation, a Tree Preservation Order prohibits the following activities from being carried out to the trees protected by that Order without the prior written consent of the local planning authority:

- cutting down
- topping
- lopping
- uprooting
- wilful damage
- wilful destruction

Additionally, in the view of the Secretary of State, the cutting of tree roots also constitutes a prohibited activity and therefore requires the authority's consent. Where consent is granted, it may be subject to specific conditions, which must be strictly adhered to.

Trees in a conservation area that are already protected by a Tree Preservation Order are subject to the normal procedures and controls for any tree covered by such an Order.

4.5 In accordance with the legislation anyone who wishes to undertake work to tree(s) which are included within a Tree Preservation Order must obtain the prior formal consent of the Local Planning Authority (LPA). The only way to obtain such consent is by submitting a formal application for the works, any such valid application would be considered by the Local Planning Authority on its own merits and either granted or refused consent as considered appropriate.

4.6 Trees in a conservation area that are not protected by a TPO are protected by the provisions in section 211 of the Town and Country Planning Act 1990 (as amended), hereafter the Town and Country Planning Act 1990 (as amended) is referred to as The Act.

4.7 These provisions stipulate that anyone who does something which might be prohibited by a TPO to a tree protected in accordance with section 211 of The Act is guilty of an offence.

4.8 Section 211 of The Act also provides that anyone charged with such an offence can establish a defence under law by proving that they served prior written notice of their intention on the Local Planning Authority (e.g. with sufficient particulars to clearly identify the tree(s) for which treatment was proposed and the nature and

extent of the treatment(s) proposed to those tree(s)) and that they then did the work either with the prior formal consent of the LPA, or *"after the expiry of the period of six weeks from the date of the notice but before the expiry of the period of two years from that date."*

4.9 A section 211 Notice of Intent is not an application and should not be treated as such. In accordance with The Act, if the Local Planning Authority wishes to control treatment of a tree subject of a section 211 notice of intended treeworks, it must make a Tree Preservation Order. An application for Tree Preservation Order consent would then be required and would be determined in accordance with the provisions of the relevant legislation (it is not possible to grant a conditional consent or refuse a section 211 notice of intent).

4.10 The legislation does include some exemptions from the usual application and six week notification procedures. At law the onus to demonstrate that an exemption applies rests with those seeking to rely thereon and there is still a requirement to give the Local Planning Authority written notice of works proposed under specified exemptions – with evidence. If the Local Planning Authority receives clear evidence that an exemption applies in respect of specified works we would advise the applicant/agent accordingly and record details on our records system as an Exemption Notice.

Offences under the tree preservation legislation

4.11 Any person who contravenes a Tree Preservation Order, for example, by damaging, or by carrying out works such as cutting down, lopping, uprooting, a protected tree without the prior written consent of the Local Planning Authority, is committing a criminal offence.

4.12 Under Section 210(1) of The Act, it is a criminal offence for any person in contravention of a Tree Preservation Order to:

- cut down, uproot or wilfully destroy a tree; or
- top, lop or wilfully damage a tree in a way that is likely to destroy it; or
- cause or permit such activities

Any individual found to have contravened the legislation in such a way may be subject to prosecution and, if convicted, liable to significant penalties.

4.13 For the purposes of the Act, it is not necessary for a person to completely obliterate a tree in order to be considered as having 'destroyed' it. It is sufficient that the tree is rendered useless as an amenity or as something worthy of preservation.

4.14 Section 210(4) of the Act sets out that it is also an offence for anyone to contravene the provisions of an Order other than those mentioned above. For

example, anyone who lops a tree in contravention of an Order, but in a way that the tree is not likely to be destroyed, would still be committing an offence under this section ’.

4.15 It is in offence to cause or permit prohibited tree work. Furthermore, under section 44 of the Magistrates’ Courts Act 1980 any person who ‘aids, abets, counsels or procures the commission by another person of a summary offence shall be guilty of the like offence’. So anyone who engages a person or company that physically carries out unauthorised work may also be subject to enforcement action.

4.16 Where a company contravenes a Tree Preservation Order, section 331 of the Act provides that a director, manager, secretary, or other similar officer of the company may also be held liable if the offence was committed with their consent or connivance, or if it resulted from their neglect.

4.17 Where an alleged action falls short of the definition in section 210 of The Act, section 1(1) of the Criminal Attempts Act 1981 may provide an alternative route in some cases where unauthorised work has been attempted.

Level of Offences and Possible Penalties

4.18 There are three main types of offence under UK law: summary only, triable either way and indictable only. Summary only offences are considered to be of lower severity and can only be tried in Magistrates’ Court. Indictable only offences are considered to be the most serious and can only be tried in Crown Court. Either way offences can be tried in either court.

4.19 Offences under section 210(1) of The Act are triable either way. If someone is convicted in Magistrates’ Court of a summary offence under this section, they may receive a fine of up to £20,000. In serious cases a person may be committed for trial in the Crown Court (charged with an indictable offence) and, if convicted, is liable to an unlimited fine. In setting the level of any fine the Court shall in particular have regard to any financial benefit which has resulted, or is likely to result, from the offence.

4.20 Offences under section 210 (4) of The Act are Summary only offences. Anyone found guilty in a Magistrates’ Court of an offence under this section is liable of a fine up to level 4 of the standard scale of fines for summary offences (set within section 122 of the Sentencing Act 2020 – and currently up to £2,500).

Replacement Planting

4.21 In accordance with section 206 of The Act if a tree is removed, uprooted or destroyed in contravention of the tree preservation legislation, or (except for trees which are protected within a Woodland Designation Tree Preservation Order), where trees are removed under specified exemptions, then the legislation automatically imposes a duty on the owner of the land to plant another replacement tree of an appropriate size and species at the same place as soon as

they reasonably can.

4.22 If the tree which was removed, uprooted or destroyed was included with a Tree Preservation Order then the Order will automatically apply to the replacement tree as it did to the original tree.

4.23 If the necessary replacement planting is not undertaken voluntarily then the Council can serve a Tree Replacement Notice in accordance with section 207 of The Act to secure such planting.

4.24 A Tree Replacement Notice must include details of:

- what has given rise to the duty;
- whether the notice relates to contravening a Tree Preservation Order or a section 211 notice;
- whether the notice relates to complying with a condition of consent;
- the number, size and species of the replacement trees
- where the trees are to be planted (including a plan showing their position);
- the period at the end of which the notice is to take effect (the period specified must be a period of not less than 28 days beginning with the date of service of the notice);
- a date by when the tree replacement notice should be complied with (the Local Planning Authority should consider what the landowner can reasonably do);
- the landowners rights of appeal against the notice.

4.25 Failure to comply with a tree replacement notice is not an offence. If a tree is not planted within the period specified in the notice the authority may extend the period for compliance with the notice. Alternatively, the Local Planning Authority may go on to the land, plant the tree and recover from the landowner any reasonable expenses incurred.

Felling Licences

4.26 In accordance with The Forestry Act 1967 a Felling Licence may be required before anyone can fell trees.

4.27 Sometimes there are exceptions, or permissions may apply, that allow felling to proceed without a licence.

4.28 A tree felling licence is not required when:

- felling trees in gardens, churchyards or a public open space
- felling trees is required to prevent the spread of a quarantine pest or disease, as authorised by a Statutory Plant Health Notice (SPHN)
- felling trees with a diameter less than 8cm (the width of baked bean can) at a height of 1.3m on the main stem
- trees growing in inner London boroughs

4.29 Up to 5 cubic meters of timber may be felled each calendar quarter without a felling licence. This is approximately 4 tonnes depending on tree species, or a stack of timber about the size of a small car.

4.30 It should be noted that this legislation is administered by The Forestry Commission – not the Council.

4.31 Annex 1 of this report is a copy of the guidance booklet "Tree felling Getting permission - updated 2023" which includes information on the Felling Licence legislation.

Case study Hectorage Road

4.32 In January 2022 a number of trees were felled/removed from land to the north of Hectorage Road in Tonbridge.

4.33 An approximately 0.65 hectare area of the site was cleared using machinery including a Forest Mulcher with timber and stumps being cleared from the site as the work was being done.

4.34 The trees that were felled or removed were not subject to a Tree Preservation Order, the site did not fall within a designated Conservation Area, and, as the land had not been developed, there were no extant planning conditions applicable to the site at the time of the works. Members were advised that felling/removal of the trees was not in breach of the planning/tree preservation legislation. However, the felling may have been in breach of the Felling Licence legislation. The Tree and Landscape Officer therefore passed details of the case to The Forestry Commission for them to investigate.

4.35 Having assessed the matter, the Forestry Commission passed their file to the Defra Investigation Service to investigate in line with their procedures.

4.36 Defra requested that the Tree and Landscape Officer and Senior Planning Enforcement Officer provide them with witness statements and exhibits to assist in their investigation.

4.37 In January 2022, an alleged illegal tree felling incident occurred, prompting an investigation by Defra's Investigation Service on behalf of Forestry Commission

(FC) England. The case was referred to the Crown Prosecution Service (CPS), which charged the landowner company under Section 17(1) of the Forestry Act 1967 of felling trees without a licence.

4.38 At a court hearing in July 2024, the company proposed a remedial plan to replant trees on the site. The court accepted the proposal, granting six months to plant 550 trees in line with Forestry Standards. By February, the FC confirmed that 850 trees, including appropriate species and hedgerow varieties, had been planted and committed to ongoing maintenance. The FC will conduct a follow-up inspection in two years.

4.39 The Gov.uk website includes the following webpage with advice on how to report suspected illegal tree felling in breach of the Felling Licence legislation: https://www.gov.uk/guidance/report-suspected-illegal-tree-felling#what-could-happen-if-a-tree-is-cut-down-without-a-licence

Wildlife Crime

4.40 In addition to the need to comply with the provisions of the Felling Licence and tree preservation legislation anyone who is undertaking work to trees (even if the trees are not protected) will also need to comply with the requirements of wildlife protection legislation (such as the Wildlife and Countryside Act 1981).

4.41 Investigations and prosecutions relating to alleged wildlife crime are undertaken by the wildlife crime unit of Kent Police (not the Borough Council) and anyone who has evidence that a wildlife crime may have been committed should pass details/the evidence to the Police for them to investigate. Further information on wildlife crime and how to report it can be found on the following webpage of the Kent Police website: Wildlife crime | Kent Police

5 Other Options

5.1 There is no proposal or other options for this report as it is purely for information and noting.

6 Financial and Value for Money Considerations

6.1 None – this report is for information only.

7 Risk Assessment

7.1 None - this report is for information only.

8 Legal Implications

8.1 None - this report is for information only

9 Consultation and Communications

9.1 None - this report is for information only

10 Implementation

10.1 None - this report is for information only

11 Cross Cutting Issues

11.1 Climate Change and Biodiversity

11.1.1 Climate change advice has not been sought in the preparation of this report (which as noted above is for information only).

11.2 Equalities and Diversity

11.2.1 The Equality Act 2010 (the Act) came into force in April 2011. The general duty on public bodies is set out in Section 149 of the Act. The duty requires the Council to have due regard to the need to eliminate discrimination and promote equality in relation to those with protected characteristics such as race, disability, and gender including gender reassignment, religion or belief, sex, pregnancy or maternity and foster good relations between different groups when discharging its functions.

11.2.2 The council have considered the above act but do not believe that the preparation of this report (which is for information only) would have a significant impact on any of the groups as noted in the Act.

11.3 Other If Relevant

- None

Background Papers	None
Annex	Annex 1 - A copy of The Forestry Commission's booklet "Tree felling Getting permission - updated 2023".

Forestry Commission

Tree felling

Getting permission - updated 2023



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Introduction

To protect and sustain England's highly valued trees and woodlands, a felling licence from the Forestry Commission is normally required before growing trees can be felled.

The **Forestry Commission**[1] is the government department responsible for protecting, expanding and promoting sustainable management of woodland, and for increasing the value of trees and woodland to society and the environment. We (the Forestry Commission) are the regulator for tree felling, responsible for assessing applications and for issuing licences. We monitor compliance where replanting is a condition of a licence, and use enforcement action on individuals who allow the felling of trees when a licence was required.

This booklet tells you (the applicant) how to prepare and apply for permission to fell trees on your own land, or the land of someone you represent; and what we will do if trees are felled without a licence. This booklet is for guidance only and is not a legally binding interpretation of the legislation (principally the **Forestry Act 1967**).[2] If you are unsure whether you require a felling licence, speak to your local **Forestry Commission area office**[3] for guidance before you start any tree felling. Further information is available on **GOV.UK**.[4]

Applying for a felling licence three or more months prior to felling will help ensure your licence is in place before you want to commence felling.

1. What is a felling licence for?

Tree felling is a legally controlled activity. You will normally need permission from us to fell growing trees and we will normally provide this by issuing a felling licence. The licence will allow you to fell identified trees and woodland legally.

In certain circumstances you may still need other permissions from other organisations (see sections 3 and 4) before you can fell the trees. Sometimes this applies even if you do not need a felling licence.

Felling licences are normally issued for a five-year period. However, if associated with a Forestry Commission approved woodland management plan, a licence will normally authorise felling for a period of ten years.

You should carefully consider the tree felling you want to carry out. Think about how long it will take to do the work. You are also advised to get in touch with neighbours and make them aware of your tree felling plans.

1.1 Important background

There is a presumption against permanent loss of woodland cover, in particular ancient woodland. Most felling licences that we issue will contain conditions that require felled trees or areas of woodland to be replaced by replanting or allowed to regenerate. A typical exception to this is a thinning licence, where sufficient woodland cover is retained so as not to require restocking.

Once a felling licence has been issued it cannot be withdrawn. And once tree felling has started a felling licence cannot be amended.

Everyone involved in the felling of trees – whether it is an owner felling trees themselves or employing others to do the work such as an agent, timber merchant or contractor – must ensure that a felling licence or other permission has been issued before any felling is carried out, or that one of the exceptions (see section 2) specified under the Forestry Act, and elsewhere, applies.

All felling work must be carried out in accordance with the licence and any other permission issued, and must remain compliant with all other legislation and regulations affecting operations to fell trees. These requirements are reflected in the **UK Forestry Standard**.[5]

Do not begin to fell trees until we have issued a felling licence to you and you have all other necessary permissions to fell trees in place.

Any felling carried out without a felling licence is an offence unless it is covered by an exception.

If there is no felling licence or other permission to fell trees in place, or if the wrong trees are felled and no felling exception can be proved, everyone involved can be prosecuted.

We will assess reports of unlicenced tree felling. This may result in enforcement action being taken to ensure tree or woodland cover is restored, and it may also involve seeking a prosecution of those involved (see section 7).

Please note:

- All web addresses can be found on page 24.

2. Exceptions from the need for a felling licence

Certain types of felling and tree works do not require a felling licence. The Forestry Act 1967, and other related regulations give details of these exceptions in full.

In certain circumstances you may still need other permissions from other organisations (see sections 3 and 4) before you begin felling trees.

If you intend to fell trees covered by one or more of the exceptions within the legislation, it is established in case law that it is your responsibility to prove that an exception applies. You should gather evidence that shows a felling licence was not required before you start any felling. The evidence to be gathered will be specific to each felling site and the exception claimed. It is prudent to retain evidence, so that you can demonstrate the exception to the Forestry Commission should you need to in the future.

We advise that you keep photographic records (with reference to scale) that show the tree setting and condition before and after felling.

Other forms of evidence to retain should include maps, site surveys or reports, inspection checklists and, importantly, a record that confirms when tree felling took place.

You may wish to contact your local Forestry Commission area office to ask their advice on whether a specific tree felling exception can be used. The commonly used exceptions are outlined in the rest of this section.

Refer to the **Forestry Act 1967**[6] and the **Forestry (Exceptions from Restriction of Felling) Regulations 1979**[7] for the complete list of exceptions.

2.1 Calendar quarter personal allowance

In any calendar quarter you may fell up to 5 cubic metres (m^3) of growing trees on your property without a felling licence, as long as no more than 2m^3 are sold.

Calendar quarters are defined as: 1 January to 31 March, 1 April to 30 June, 1 July to 30 September, and 1 October to 31 December.

By **property**, we interpret this to mean within the immediate property or holding; Other properties you may have and that are some distance away could be considered to be a separate property and so have their own 5m^3 allowance. Your **local Forestry Commission Woodland Officer** will be able to confirm if more than one count of this exception may apply.

The volume of timber in a standing tree is assessed by measuring the amount of wood in the main tree stem(s) where this is greater than 8cm in diameter over bark. For large broadleaved trees, this includes major branches. Other methods are available for assessing felled trees. If you are to fell 5m^3 of timber in successive calendar quarters you are strongly encouraged to retain evidence of what felling took place and when, in order to demonstrate that less than 5m^3 was felled in each calendar quarter.

You may commit a separate offence under the **Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999** if you systematically clear an area of woodland over time without permission from the Forestry Commission under those regulations (see section 4.5).

2.2 Lopping and topping

An exception applies for tree works involving tree surgery by way of lopping or topping, for example, pollarding. Such works are used today to maintain a tree in good health and to extend its lifespan in highly modified environments, such as streetscapes. These works do not require a felling licence.

Please also see section 4: Other controls on tree felling.

2.3 Trees of small diameter

An exception applies to felling trees that, when measured at a height of 1.3 metres from the ground:

- **have a diameter over bark of 8cm or less;**
- **if thinning, have a diameter over bark of 10cm or less; or**
- **if underwood or existing coppice (i.e. previously managed by cutting to promote multi-stemmed growth arising at or near ground level), individual stems have a diameter over bark of 15cm or less.**

Thinning is defined within the Forestry Act 1967 as "felling carried out in order to improve the growth of other trees". The UK Forestry Standard's definition is "The removal of a proportion of trees in a forest after canopy closure, usually to promote growth and greater value in the remaining trees." The Forestry Commission interpret both phrases to mean the felling of no more than 30% of trees from any area, spread evenly among the retained trees.

2.4 Tree species and tree locations

There are exceptions that apply to:

- **fruit trees, for example, orchard species like apple, pear or plum;**
- **trees standing or growing in an orchard, garden, churchyard or public open space; and**
- **trees growing in the inner London boroughs.**

2.5 Dangerous and nuisance trees

An exception applies for the felling of a tree or trees necessary for the **prevention of danger or the prevention or abatement of a nuisance.**

The danger exception could be said to apply only where there is an immediate risk of serious harm and urgent work is needed to remove the risk.

The nuisance exception could be said to apply only where there is an actionable nuisance (i.e. actual damage or an immediate risk of actual damage being caused to someone else's property for which they could sue you for compensation), or nuisance by way of actual encroachment onto someone else's property.

If you use these exceptions you will be asked to provide evidence of how the tree(s) presented a danger to people, property, or infrastructure for example. Not all old or diseased trees are necessarily dangerous; you need to consider the risk they pose and demonstrate the exception is valid.

Please note, the assessment of the structural integrity of a tree is a specialist area and therefore, unless clear and obvious, you may need to obtain expert advice and an arboriculturist report to evidence that the danger was present. In the event of a prosecution for unlicensed felling, the legal burden of proving that an exception existed rests with you.

We strongly recommend that you obtain a felling licence, or that you seek professional advice before felling any trees, rather than proceeding with the felling and then seeking to rely upon this exception.

2.6 Tree health

An exception applies where the felling of trees is necessary to prevent the spread of a quarantine pest or disease in accordance with a Statutory Plant Heath Notice (SPHN), as issued by the Forestry Commission under the **Plant Health (Forestry) Order 2005**.[9] An SPHN is subject to its own enforcement rules if felling is not undertaken within the required timescales.

If you have not been issued with a SPHN, there is no general exception from the need for a felling licence for diseased trees and a felling licence will be required, unless another reason for exception applies, or a tree is specifically infected with dutch elm disease and greater than 50% of the crown of the tree is dead.

2.7 Development

An exception applies where the felling of trees is **immediately required** for the purpose of carrying out development that is authorised by the approval of full planning permission, or is allowed as permitted development (i.e. any permission that is granted, or deemed to be granted, under the Town and Country Planning Act 1990, including any planning conditions or s.106 agreements attached to a full planning consent). The approved planning permission will detail the extent of the approved development and may also define the trees that are allowed to be felled or those that must be retained.

The development exception can relate to individual or groups of trees or woodland, and for trees to be exempt from the need for a felling licence at least one of the following conditions must be met:

- **trees must be explicitly identified in the planning consent as being permitted for removal;**
- **the trees must stand within the footprint of the proposed development; or**
- **the removal of the trees must be necessary in order to carry out the proposed development (e.g. they block an access route to which there is no alternative, or lie in such close proximity to the proposed development that they prevent the carrying out of that development).**

The exception does not simply extend to all trees within the 'red line' boundary of the fully approved proposed development.

Full planning consent, or reserved matters approval for outline planning consent, obtained after unlicenced tree felling does not provide an exemption to the requirement for a felling licence.

Outline planning permission: This status is not sufficient to demonstrate that the felling of

trees is immediately required for the purposes of development. A felling licence will be required in these circumstances, unless another reason for exception applies (such as a relevant full planning permission).

Permitted development: Some development is permitted development (i.e. planning permission is not required) pursuant to the Town and Country Planning (General Permitted Development) (England) Order 2015. The felling of trees in accordance with permitted development, and which is immediately required for the purpose of carrying out the permitted development, is exempt from the need for a felling licence.

When considering tree felling related to development activity, we may ask you for evidence that it is permitted development, or that planning permission is deemed to be granted. You are advised to keep a copy of any certificate or correspondence with the local authority that demonstrates this.

2.8 Statutory Undertakings

Statutory Undertakers are empowered by a wide variety of Acts and regulations to construct and maintain infrastructure, such as those for utility supplies, pipelines, communications, canals, waterways and so on.

An exception applies to trees felled by Statutory Undertakers on land in their occupation and where trees are obstructing the construction of any works for which they are responsible, or where trees interfere with the maintenance or operations of any works for which they are responsible. However, the specific legislation will detail what duties the Statutory Undertaker has, and under what circumstances they can fell trees under those duties in order to benefit from this exception.

2.9 Other legislation that consents tree felling

Similar to Statutory Undertakings, an exception applies to any tree felling that is undertaken in compliance with any obligation imposed by, or under, an Act of Parliament. For example, bodies such as Highways England, Network Rail and local highway authorities have statutory duties to maintain the safe operation of their infrastructure and they may fell growing trees without a felling licence.

Statutory Undertakers and authorities discharging duties imposed by, or under, Acts of Parliament are encouraged to keep records of what tree felling they undertake, when, and to identify the specific legislation or statutory provision under which the tree felling is enacted. Sharing this information with the Forestry Commission on request will be of benefit to all parties concerned.

2.10 Retrospectively applying an exception

Exceptions to the need for a felling licence cannot be applied retrospectively after the felling has taken place.

For example, the granting of planning permission subsequent to any felling taking place does not retrospectively undo an offence of felling without a licence where one was required.

2.11 Summary

We strongly recommend that you contact your Forestry Commission area office if you are uncertain about whether any of these exceptions apply.

We can provide advice that could minimise the risk of you felling trees without a felling licence, where one would have been necessary, and we will help you secure a felling licence if one is necessary.

There are a number of other controls on tree felling that you may need to take into account – a few examples are set out in the following sections.

3. Environmental legislation and protection

A felling licence permits you to fell growing trees legally. However, the felling of those trees may still need separate consents or permissions.

Some species of plants and animals have declined to such an extent that they, and the habitats they rely on, have legal protection. It is important that you balance managing woodland and producing timber with **protecting important wildlife and woodland habitat**.[10]

3.1 Protecting wildlife and habitats

The **Wildlife and Countryside Act 1981**[11] protects rare or endangered plants, wild birds and other animals, with differing levels of protection according to their needs. The Act makes it an offence intentionally to:

- **kill, injure, or take any protected species;**
- **take, damage or destroy any nest or place of shelter or protection, in use or being built;**
- **take or destroy an egg of any wild bird or to intentionally disturb animals using resting places; and**
- **pick, uproot or destroy protected plants.**

The Conservation of Habitats and Species Regulations 2017[12] also protects a range of plants and animals – referred to as **'European Protected Species' (EPS)**[13] – and their habitats. Several EPS are found in trees and woodland, and these regulations have implications on how woodlands are managed and how tree management operations are carried out.

In collaboration with Natural England, we have published **good practice guidance**[14] and an **EPS checklist**[15] to help you plan sustainable woodland management. A majority of felling operations should be able to proceed even in the presence of EPS, provided that good practice guidance is followed. But where tree felling is unable to comply with good practice, an **EPS wildlife licence**[16] must be obtained from Natural England.

Contact your Forestry Commission area office if you think you need an EPS wildlife licence.

3.1.1 Preventing damage to habitats and species

Wildlife law can be complex and, although it is not always illegal to fell during the bird nesting season or when protected species are present, precautions must be taken by law. Before starting any tree felling, you must carefully assess the risks from the work proposed and how felling work will impact on resident wildlife populations and associated habitats.

You must make sure that the work is planned to ensure protected species are not intentionally harmed or killed; that their nests or dwellings are not damaged or destroyed; and that the habitat is safeguarded from permanent and lasting damage. Particular attention is needed in respect of birds and bats that may be nesting or roosting in the trees you intend to fell, as well as mammals such as dormice, otters and badgers, which will actively use the woodland for foraging and raising young at certain times of the year, and may hibernate at other times.

You should make and keep records of any surveys undertaken, any reports you commission, and the decisions you make on how and when tree and woodland management is undertaken. An **Operational Site Assessment**[17] (OSA) is a useful way of recording the planning of forestry works. You may need to seek further professional or specialist advice to achieve this.

Natural England is the body responsible for administering this wildlife legislation. However, you should contact **your local Forestry Commission Woodland Officer**[18] regarding any proposed felling works in the first instance.

3.1.2 If protected species have been disturbed

If you use the Good Practice guidance and other literature available online, you should be able to protect wildlife populations. However, if you identify protected species when carrying out forestry operations – for example, a population of bats being directly affected by your tree felling activity – you must stop work immediately.

Contact **Natural England**[19] (0300 060 3900) and explain what has happened. They will tell you what to do next with regards to safeguarding the immediate population affected by your operation.

There are other bodies that are able to help in such situations, such as the **Bat Conservation Trust**.[20]

3.2 Protecting landscapes and public access

In areas with protected landscape or that have open access land you should make sure you understand the local policies related to woodland cover and woodland access. The views of those who manage those landscapes should be sought and their advice used to influence your tree felling proposals.

National Parks and Areas of Outstanding Natural Beauty

Where wider landscapes have been identified as having a special character, for example National Parks (NP), Areas of Outstanding Natural Beauty (AONB) and Heritage Coasts, we will inform the responsible bodies on significant felling proposals within those areas.

Open access land

Where public access to the wider landscape is guaranteed through open access land, you may need to notify the **Local Access Forum**[21] (LAF) of your felling proposals. The full list of LAFs and their contact details can be found on .GOV.UK.

You may also need to contact **Natural England's Open Access Contact Centre**[22] (OACC) to seek a permission to close open access land during tree felling. You can find out more on **open access land and the coastal margin: how to restrict public access**[23] page on .GOV.UK.

Commons

There is historic legal protection for common land to remain not enclosed, not built upon and free from fences and other works that impinge on access to the land. It is important that you understand the legal position and requirements surrounding commons before attempting to **carry out any works on common land**.

There has been a legal requirement to obtain Secretary of State consent for carrying out works that would prevent or impede access on common land since 1925 (Law of Property Act s.194). This has since been strengthened by the Commons Act 2006.

The earlier Act applied only to land subject to 'rights of common' on 1 January 1926, but s.38 of the 2006 Act applies to:

- all land registered as common land; or
- land not registered as common, but where the land is regulated by an Act made under the Commons Act 1876, or is subject to a scheme under the Metropolitan Commons Act 1866 or the Commons Act 1899.

Works on commons owned by the National Trust are covered by separate legislation – The National Trust Act 1971.

Both Acts require that consent is obtained for any restricted works that will prevent or impede access. Such works will include fencing, creating ditches, forestry works, new solid surfaced roads, paths and car parks.

Restocking required under a felling licence requires consent from the Planning Inspectorate on behalf of the Secretary of State, as the resulting woodland would be seen as reducing public access, even where there was already woodland on the common prior to felling.

3.3 Protecting designated areas and sites

Certain areas of land are designated or protected due to their natural or cultural importance, and some sites are designated because of specific features unique to that location.

Examples of designated areas include Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar sites and World Heritage Sites (WHS). Examples of designated sites are Sites of Special Scientific Interest (SSSI) or Scheduled Monuments (SM). You may need additional permissions or consents to undertake any proposed tree felling work in these areas:

- If the proposed tree felling will take place within, or in some way impact on a SAC, SPA or Ramsar site, then a further assessment by us is needed before your licence can be issued. As part of your application, you should tell us if you wish to carry out any work that may affect a protected site's features and how you propose to mitigate any impact, so we can assess any likely effects.
- Some protected sites, such as SSSI or SM, may need a separate consent from the relevant authority for the protected site. For example, Natural England is the relevant authority for creating and maintaining SSSIs. If you are proposing tree felling within or adjacent to a SSSI then you should also complete a **Supplementary Notice of Operations**[24] (SNO) alongside your felling licence application. We can help you secure that consent while processing a felling licence application.

  The SNO gathers information on how you will protect the SSSI interest while undertaking the tree felling. This helps Natural England to decide whether or not it needs to give its SSSI consent to the tree felling work and associated activity. You should submit both forms to us.

- Historic England is the relevant authority for scheduling and maintaining SMs in order to conserve features of cultural heritage. If you are proposing work to any trees on an SM, you may need to obtain **Scheduled Monument Consent**[25] from Historic England, independently from your felling licence application, before you start work.

  You will need to provide Historic England with detailed information on how you will protect the SM interest while undertaking the tree felling. This will help Historic England decide whether or not to give SM consent for the felling work.

If you do not tell us about a protected site and this is not picked up through processing your application, then your felling licence may not support other permissions or consents you may need. Subsequent work, if undertaken, may result in an offence being committed.

3.4 Hedgerows Regulations

Hedgerows in England are protected under the Hedgerows Regulations 1997, and you may need permission to **undertake protection and management work**.[26] If you intend to remove a hedgerow completely, then you may be required, under the **Hedgerows Regulations 1997**,[27] to consult the local planning authority (LPA) before you do so.

If you intend to fell a tree within a hedgerow then you should first check the felling exceptions in section 2 of this document. If your proposed work is not covered by one of these exceptions then you will need a felling licence to carry out this aspect of your work.

Some tree felling and tree works on hedgerow trees are restricted at certain times of the year under land management rules. Failure to comply with these regulations can result in the Rural Payments Agency being notified (see section 6.9).

4. Other controls on tree felling

4.1 Tree Preservation Orders and conservation areas

Tree Preservation Orders (TPO) and conservation areas[29] are made by the local planning authority (LPA), usually a local council, under the Town and Country Planning (Tree Preservation) (England) Regulations 2012.[30] They protect specific trees and areas of woodland with high amenity value. You should contact your LPA to find out if these designations apply to the trees you want to fell and discuss if there are any issues in felling them.

4.1.1 Trees protected by a Tree Preservation Order

- If you wish to fell a tree or trees that are protected by a TPO, and an exception from the need for a felling licence does apply – for example, because you are carrying out works on a garden tree – then you will not need a felling licence from us.

  However, you are still likely to need to apply for permission from the LPA to fell protected trees.
- If no exception can be claimed then you will need to apply for a felling licence. In your application you must tell us which TPO protects the trees, and which of the trees to be felled are protected. We will decide whether to issue a felling licence. You will not need a separate permission from the LPA for the TPO, as we will consult with the LPA on your behalf before making our decision.
- Alternatively, the Forestry Commission can refer the full felling licence application to the LPA for them to solely determine if the tree or trees can be felled under the Town and Country Planning (Tree Preservation) (England) Regulations 2012.

Please note that the Forestry Act 1967 (s.15) prevents local authorities from considering applications to fell trees protected by a TPO when the felling activity will normally require a felling licence.

4.1.2 Failure to agree felling proposals on protected trees

If you apply to us to fell trees that are covered by a TPO, the LPA has the opportunity to object to the proposals in the felling licence application. If an objection is made and is not withdrawn, this prevents us from issuing the felling licence. If the LPA sustains its objection, then the felling application may be referred to the Secretary of State for determination.

4.1.3 A TPO is applied after a felling licence application is made

If a TPO is placed on trees after a felling licence application has been submitted to us, but before we have given our decision, we need to take that new order into account while your application is being assessed. You should tell us immediately if you know a TPO has been applied (see section 4.1.5).

Where a TPO is made on trees after a felling licence is issued, you should contact us immediately as you will need a new felling licence that takes account of the TPO. You may commit an offence if you fell a tree without a valid felling licence in place.

4.1.4 Conservation areas

If you are not applying for a felling licence, you are required to notify the LPA (6 weeks in advance but not more than 2 years in advance) of any works on trees (e.g. felling, topping, lopping, or uprooting work) within a Conservation Area that you plan to undertake, in accordance with section 211 of the Town and Country Planning Act 1990.

If you are applying for a felling licence, the Forestry Commission will notify the LPA of the application and seek its views in respect of 'the amenity of the district'. You are not then required to notify the LPA directly as the above duty to notify them is removed by regulation 15 of the Town and Country Planning (Tree Preservation) (England) Regulations 2012.

Should the LPA protect the tree with a TPO within the Conservation Area after being notified of upcoming works, this could result in a new felling licence being required - see 4.1.3.

4.1.5 Failure to disclose a TPO or conservation area

Failure to disclose the presence of a TPO or conservation area in your felling licence application will mean that your application is inaccurate, contrary to the declaration on the application form.

If we issue a felling licence for trees covered by a TPO or within a conservation area, and you did not declare their existence at the point of application, then you may commit an offence, such as fraud, if you fell a tree without an accurate felling licence in place.

Your felling licence application may be published on the **Public Register of new planting and felling**.[31] The LPA may check the details of applications being published on the Public Register and let us know that a TPO is in place and may object to the proposed works.

4.2 UK Forestry Standard

The **UK Forestry Standard**[32] (UKFS) sets out the UK government's approach to sustainable forestry and woodland management, including standards and requirements as a basis for regulation, monitoring and reporting requirements.

We assess all forestry proposals, including applications for felling licences, against the UKFS before giving approval. We will only approve your felling proposals and issue a felling licence if we are satisfied that they meet the UKFS relevant to the individual licence area.

4.3 Woodland management plans

For larger woodland holdings, long term woodland management planning and subsequent activity is a key component in maintaining the productivity and condition of your woodland, and we actively encourage the production of a UKFS compliant **woodland management plan**.[33]

A Woodland Management Plan may contain tree felling and restocking proposals. Following our assessment and 'approval in principle' of a woodland management plan, we can then process a felling licence for the associated tree felling.

This felling licence is linked to the woodland management plan and is valid for 10 years of tree felling work.

4.4 Tree health and the movement of timber

Regulations exist to prevent the spread of pests and pathogens of trees.

In certain **pest or pathogen**[34] outbreaks, you may require specific permission to move infected material, such as timber. For example, where a **Statutory Plant Health Notice (SPHN)** has been issued due to the presence of Phytophthora ramorum, a pathogen that affects larch and other woody species, you will need a movement licence[35] to move your timber.

We ask you to be aware of the risks posed by pests and pathogens and to help **prevent the introduction of pests and diseases**[36] by being vigilant in checking the condition of your trees and woodland, and to take responsible measures, such as biosecurity, in combating threats to tree health.

You can report signs of key tree pests and pathogens using **Tree Alert**.[37]

4.5 Land use change – Deforestation, EIA, and Open Habitats

The Forestry Commission is the relevant authority for the EIA Regulations related to forestry projects in England, including any deforestation proposals. **(Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999.**[38]**)**

If you intend to fell trees and convert the land to another land use, we will need to assess these proposals under the EIA Regulations. Failure to seek our 'stage 2' Consent where it is required may result in enforcement action being taken against you.

You can find more information on forestry EIAs on gov.uk.

4.5.1 Proposed conversion to priority habitat

If you are converting woodland into a priority open habitat, your proposal will be assessed under the government's Open Habitats Policy. You may need to complete an EIA deforestation enquiry form, and submit it with your felling licence application.

4.5.2 Proposed conversion to agriculture

We will not normally agree to woodland clearance for conversion to agricultural use. If this is what you want to do, we may ask the Department for Environment, Food and Rural Affairs (Defra) to assess the contribution that the conversion of the land to agriculture would make to the economic viability of your agricultural holding before making our decision. It is likely that if we do agree to the conversion to agriculture, you will be required to create an equivalent area of replacement woodland. Without this, your proposal is likely to be refused.

You may need to complete an EIA deforestation enquiry form and submit it with your felling licence application.

5. Applying for a licence

5.1 Who can apply?

You can apply for a felling licence if you own the land on which the trees are growing; if you are a lessee or tenant and your interest entitles you to fell the trees; or you can demonstrate you have a legal right to fell the trees (once the appropriate permissions are obtained).

An agent, acting for the owner or lessee, can also apply to fell the trees, but the licence will be issued in the name of the owner or the lessee of the land. An agent must demonstrate that they have sufficient interest in the land and that they are authorised to represent the owner or lessee. You can do this by using our **agent authority form**.[39]

We will accept applications from, and issue licences to, a business or organisation. Such applications must include details of a named individual who has authority to sign the application and any restocking conditions. This person will be an employee of the business or organisation, or an agent with sufficient authority. The business or organisation must have the same interest in the land as mentioned above.

Developers are advised to carefully consider the implications of applying for a licence. Felling trees under the authority of a conditional felling licence will engage a condition to restock the land with trees. This restocking condition may be incompatible with, and therefore block, your intended development. Applying for planning permission, explicitly referencing the trees to be felled, will often be a more appropriate avenue for those intending to develop a site.

5.2 How to apply for a licence

You can apply online for a felling licence using our **Felling Licence Online service.**[40] This is supported by **online user guidance**[41] and is free of charge.

If you cannot apply online and require a paper felling licence application form, then **please contact us**.[42] We can provide this by email or send one to you by post.

Do not apply online if you submit a paper application form.

5.3 Environmental map browsers

Felling Licence Online contains a constraint checking tool (a Land Information Search (LIS)) that allows you to check your felling proposal against environmental datasets, before you submit it to us. This gives you a chance to modify your felling proposals to take account for any features or designations you identify in the search.

Separately, the Forestry Commission **map browser**[43] also contains a Land Information Search (LIS) tool that allows you to search environmental datasets that might affect your land. LIS allows you to make a copy of the search results, including details of other approved felling licences in your area.

DEFRA's map browser, called **MAGIC**,[44] contains a broader range of environmental data and can provide further information on designations and issues that might affect your woodland or woodland management proposals. It also allows you to make a copy of the search results.

Some local authorities have created map browsers where you can identify conservation areas and Tree Preservation Orders. Check with your local authority to see if they provide this information online, or through their library service.

The Forestry Commission is the Relevant Authority for the **Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999 (EIA Regs)**[45] for forestry projects in England, including any deforestation proposals.

If you intend to fell trees and convert the land to another land use, we will need to assess these proposals under the EIA Regulations (see section 4.5). Failure to seek our consent where it is required may result in enforcement action being taken against you.

When we receive your felling licence application, we will acknowledge receipt within three working days. We may need to look at the felling proposals on the site and will usually contact you within three weeks to arrange a site visit.

6. Considering a felling licence application

6.1 Application documentation

Alongside the information on the felling licence application, the Forestry Commission will also need to check other relevant and supporting information including a corresponding felling plan or map, detail on impacts on protected sites, the effects on priority habitats or protected species, or where land use change, such as deforestation, is proposed.

You need to make sure other relevant supporting documents are completed correctly, in full, and are submitted with the felling licence application.

6.2 Legal decision timescale

We will review and issue, or refuse (see section 6.11) a felling licence application within three months of receiving an application to fell growing trees. If an application is incomplete, or incorrectly mapped, we will return it to you for completion and the three-month timescale will be reset upon resubmission.

If further information is required or requested by us, or a stakeholder's response to our consultation is slow, then the application may be delayed and we may need to ask if you agree to an extension. This is normally a further three months.

6.2.1 Felling licence Citizen's Charter

Alongside the legal timescale (see section 6.2), we aim to process most felling licence applications (from receipt of a complete application to an approved licence) within the Citizen's Charter target of 77 days.

6.3 Consultation

We may consult (seek advice) with other organisations to make sure that we take into account any environmental or land use issues affecting your proposals, or which your proposals may themselves impact on, and any statutory designations where permission from other bodies or relevant authorities may also be required.

6.4 Public Register

Unless your felling application is for thinning only, the felling information from your application will be published on the **Public Register for new planting and felling.**[46]

This is to give the public the opportunity to comment on the proposals. The public may request more information on felling proposals that are shown on the Public Register and can submit comments on how the proposals may affect them, but only during the period in which it is published.

Comments made on applications via the Public Register will be considered against UK Forestry Standard criteria to see if they are of material impact or interest for the felling proposals.

When a felling licence is approved and issued, we will publish the details of the approved felling licence on the Public Register, for public record, and a permanent record will be published as part of a felling licence spatial data layer via our **online map browser.**[47]

You can view the **Public Register**[48] online.

6.5 Restocking conditions after felling

The government has a general policy against deforestation – the permanent removal of trees or woodland - without replanting or regeneration. This policy is principally to ensure that tree and woodland cover and timber supply are safeguarded for future generations.

Restocking conditions will, therefore, normally be included on felling licences we approve, other than those for areas to be thinned (felling licences to thin woodland are granted unconditionally).

6.5.1 Felling conditions

Felling conditions are applied to ensure:

- **that replanting or regeneration of the felled area is undertaken in an identified location; and**

- **that the trees are maintained for a period not less than 10 years.**

Where you propose to fell parts of woodland, rather than just thin the woodland, you are required to provide restocking proposals as part of your application. We may want to discuss these proposals with you as the application is being processed.

You will be sent a copy of the final proposed restocking conditions prior to the approval of the licence. You must raise any concerns over the proposed conditions within 14 days to give us time to agree an alternative prescription before the felling licence is approved and issued.

While the felling licence gives permission for trees to be felled at any time during the period of the licence, we would expect replanting, or agreed works to encourage natural regeneration, to be completed before the date set out in the conditions of the licence.

To ensure successful establishment of the replacement trees, the conditions of a licence typically require the replacement trees to be actively maintained for 10 years.

Failing to comply with the conditions of your felling licence may result in the service of an Enforcement Notice.

6.6 Overriding felling licence conditions

If felling under the authority of a conditional licence has already taken place then those conditions cannot be subsequently overridden.

For example, the granting of planning permission will not override active conditions.

Where felling has not yet taken place, and both a conditional felling licence and an alternative permission to fell the trees is in place we will take any subsequent felling to have been authorised by the newest of the permissions granted.

For example, where a relevant planning permission or Statutory Plant Health Notice is granted after a conditional licence (but prior to felling), we will not consider the conditions of the licence to have been engaged if the felling then takes place.

The caselaw of *Arnold White Estates Ltd v The Forestry Commission [2022] EWCA Civ 1304* confirms that planning permission will not override active conditions of a felling licence, or subsequent Enforcement Notice.

6.7 How long will your felling licence last?

A felling licence will usually contain permissions to fell trees for five years. However, a felling licence associated with a Forestry Commission approved woodland management plan is valid for 10 years. The restocking and maintenance conditions of the licence can last for much longer than this.

We will consider a licence inaccurate if you did not declare, at point of application, any material facts, such as the existence of a TPO, which would have resulted in a different licence being issued.

In such circumstances you may commit an offence, such as fraud, if you subsequently fell trees covered by the licence obtained with inaccurate information.

6.7.1 Variations to an approved felling licence

Once a felling licence is approved by us it cannot be amended or withdrawn.

6.7.2 Failure to comply with the conditions of a felling licence

Once trees covered by the felling licence are felled, the associated restocking conditions must be implemented, and replacement trees maintained to achieve full regeneration of felled areas. We will carry out annual inspections to check that the felling works are compliant with the licence issued, and that restocking conditions are being met.

Failure to comply with the felling licence, by correctly felling the trees permitted to be felled and then failing to comply with the restocking conditions, may lead to enforcement action being taken through an Enforcement Notice.

It is an offence under the Forestry Act not to comply with an Enforcement Notice. Where we find evidence of breaches, we may take enforcement action (see section 7.1.1).

6.8 Renewal of a licence

If you are unlikely to complete all your felling before your licence expires, then you must apply for, and be issued with, a new licence before you can fell the rest of the trees. We recommend you allow at least three months for the new licence to be issued.

6.9 Selling land with a felling licence

The permission to fell trees remains in effect for the duration of the licence regardless of whether the land ownership or stewardship changes.

A felling licence is issued to the person who applies for it and they are subsequently able to carry out permitted tree felling or they can authorise other parties to carry out the tree felling.

However, we expect that only the person issued with the licence may authorise trees to be felled under that licence, and so if there is a change in ownership then we should be informed so that we can amend our records accordingly.

Any conditions that apply to the land after a felling licence has been enacted remain in force even after the land is sold.

If you sell land with an enacted felling licence, you should make the purchaser aware of the felling licence and its conditions. You should also inform us when the sale completes, quoting the felling licence reference.

The new landowner takes over responsibility for continuing to maintain restocking conditions. If they do not, they may be served with an Enforcement Notice to compel them to meet the conditions of the licence.

If a new landowner wants to undertake different tree felling operations, they will need to apply for a new felling licence.

6.10 Felling within grant schemes or agreements

If you propose to carry out felling or thinning as part of a grant scheme, for example, an agri-environment grant, then you must ensure that a felling licence is in place or that the proposed felling has an exception (see section 2).

A felling licence will not normally be issued as part of a grant agreement, and the grant agreement itself does not provide an exemption to the requirement for a felling licence.

It is your responsibility to apply for a felling licence and, once issued, to comply with the restocking conditions of the licence, where they apply.

6.11 How to appeal felling conditions

If an approved felling licence has conditions applied to it and you are not happy with them, you are able to appeal. You must submit your appeal within three months of the date of the licence being received by you.

You should initially contact your local Woodland Officer or Forestry Commission area office to discuss your concerns.

However, if you are still unhappy with the conditions applied, you can then appeal to the Forestry Minister. You must do this in accordance with the detailed information provided on your felling licence, which quotes Regulation 8c of the Forestry (Felling of Trees) Regulations, 1979 – as amended (SI 1979 No 791), and uses Form 6 from that legislation.

If you do not follow these instructions and you do not submit your appeal within the three-month time limit, then your appeal will not be accepted.

To review the appeal, the Minister will usually get the advice of a reference committee (independent of the Forestry Commission and selected to consider the case), before giving a decision on whether the conditions should remain or be amended.

6.12 Refusal of a felling licence application

The Forestry Commission may refuse an application to fell growing trees, for several reasons, including where we believe that the application fails to meet the interests of good forestry practice.

You may also appeal against the refusal of a felling licence, to the Forestry Minister, but only if you have previously been refused a licence for the same area and work proposals. There must be at least three years between the previous refusal (or appeal hearing) and your (subsequent) appeal request.

You must do this in accordance with Regulation 8a of the Forestry (Felling of Trees) Regulations, 1979 – as amended (SI 1979 No 791) and use Form 4 from that legislation.

7 Penalties for felling without a licence

7.1 Forestry Act 1967

If we believe that tree felling has occurred without a licence, where we would have expected one to have been needed, we will assess the felled site.

An assessment will include carrying out timber measurement, for which we have powers to enter land to undertake, and other background checks such as to confirm land ownership.

7.1.1 Felling licensable trees without a licence

It is an offence to fell licensable trees without having obtained a licence or other valid permission.

- This can mean, on conviction, a fine which is currently unlimited in value. This can apply to each person involved in the felling of trees, for example the owner, agent, timber merchant or contractor.
- Where we are satisfied that the owner, lessee or tenant of the land has committed an offence, we also have the power to serve a Restocking Notice. This compels the replanting of the land with trees to reinstate woodland cover (see section 7.1.3).
- Illegal felling is a breach of land management rules. If a Restocking or Enforcement Notice is served, the Rural Payments Agency will be notified of the agricultural holding or farming business affected by the notice.

7.1.2 Selling unlicensed timber felled without a licence

It is an offence to sell unlicenced timber without having obtained a licence or other valid permission.

- **Under the Forestry Act 1967, you are only permitted to sell up to 2m^3 of your 5m^3 personal allowance in each calendar quarter.**
- Attempting to market illegally felled timber is an offence under the **Timber and Timber Products (Placing on the Market) Regulations 2013.** These are administered and enforced by the Department for Business, Energy and Industrial Strategy (BEIS).

7.1.3 Restocking and Enforcement Notices

Restocking and Enforcement Notices typically require replacement trees to be planted or regenerated and then maintained to an acceptable standard for up to 10 years to reinstate woodland cover.

Failure to comply with a Restocking Notice may result in the service of an Enforcement Notice.

Failure to comply with an Enforcement Notice may result in a criminal investigation and constitute an offence under section 24(4) of the Forestry Act 1967, involving a summary conviction and unlimited fine.

Following conviction of a section 24 offence the court may serve a Restocking Order, requiring the replanting of trees. Failure to comply with a Restocking Order may be held to be a contempt of court and result in a further fine and / or a custodial sentence.

Restocking and Enforcement Notices served from the 1 January 2023 will be registered as a local land charge, and therefore alert prospective buyers of the land to their presence.

Should the land be sold during the lifetime of a Restocking or Enforcement Notice we may serve a new Enforcement Notice on the new owner of the land.

Obtaining full planning consent for an area subject to the conditions of a felling licence or Enforcement Notice will not be considered by us to be a reasonable excuse for non-compliance with the licence or Notice.

7.2 Environmental Impact Assessment (Forestry) Regulations 1999

There is a distinction between 'felling' and 'deforestation'.

Felling is normally a licenced activity that does not result in the permanent loss of tree or woodland cover. This is principally governed by the Forestry Act 1967 and the felling licence regime. Trees and woodland are normally expected to be restocked (replanted or naturally regenerated) after felling operations.

Deforestation is governed by forestry policies protecting net woodland cover, and typically involves the permanent loss of woodland cover. The significance of environmental harm that may result from deforestation is regulated under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations (1999).

- **You may commit an offence under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations (1999)[49] if you clear an area of woodland over time, through continued and lawful use of an exception to the need for a felling licence, but without the permission to permanently deforest that area of land.**
- We will use these regulations to enforce woodland restoration where our assessment into removal of trees and or woodland determines it is inappropriate for deforestation to occur.

8 Law

The main laws and regulations governing the control of tree felling are listed below. You can get copies of each of these online at **www.legislation.gov.uk**[50]

The Forestry Act 1967.

The Forestry (Felling of Trees) Regulations 1979 (SI 1979 No 791).

The Forestry (Exceptions from Restriction of Felling) Regulations 1979 (SI 1979 No 792).

The Wildlife and Countryside Act 1981.

The Town and Country Planning Act 1990.

The Protection of Badgers Act 1992.

The Hedgerows Regulations 1997 (SI 1997 No 1160).

Town and Country Planning (Tree Preservation) (England) Regulations 2012 (SI 2012 No 605).

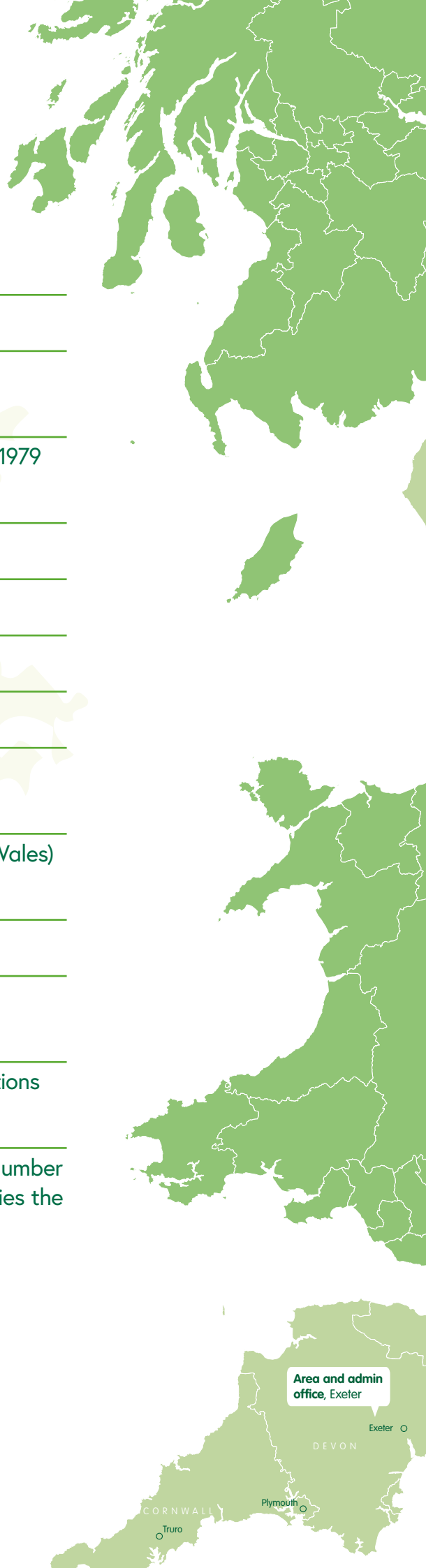
The Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999 (SI 1999 No 2228).

The Plant Health (Forestry) Order 2005 (SI 2005 No 2517).

The Conservation of Habitats and Species Regulations 2017 (SI 2017 No 1012).

The Timber and Timber Products (Placing on the Market) Regulations 2013 (SI 2013 No 233).

Please note that this list is not exhaustive and that there are a number of other laws that give local authorities and other statutory bodies the right to control or initiate the felling of trees.





Area offices

You can contact your local Woodland Officer via the area offices below:

Yorkshire and North East
Foss House, Kings Pool
1-2 Peasholme Green
York, YO1 7PX

Telephone: 0300 067 4900
yne@forestrycommission.gov.uk

North West and West Midlands
Ghyll Mount, Gillan Way
Penrith 40 Business Park
Penrith
Cumbria, CA11 9BP

Telephone: 0300 067 4190
nwwm@forestrycommission.gov.uk

East and East Midlands
Santon Downham
Brandon
Suffolk, IP27 0TJ

Telephone: 0300 067 4574
eandem@forestrycommission.gov.uk

South East and London
Bucks Horn Oak
Farnham
Surrey, GU10 4LS

Telephone: 0300 067 4420
southeast.fce@forestrycommission.gov.uk

South West
Bullers Hill
Kennford
Exeter, EX6 7XR

Telephone: 0300 067 4960
southwest.fce@forestrycommission.gov.uk

National Office
Forestry Commission
620 Bristol Business Park
Bristol, BS16 1EJ

fellinglicenceonline@forestrycommission.gov.uk

Admin offices

You can contact your local admin office:

Admin Hub, Exeter
Bullers Hill
Kennford
Exeter, EX6 7XR

Telephone: 0300 067 4960
adminhub.bullershill@forestrycommission.gov.uk

Admin Hub, Bucks Horn Oak
Bucks Horn Oak
Farnham
Surrey, GU10 4LS

Telephone: 0300 067 4420
adminhub.buckshornoak@forestrycommission.gov.uk

www.gov.uk/government/organisations/forestry-commission/about/access-and-opening

References

Introduction

1. www.gov.uk/government/organisations/forestry-commission
2. www.legislation.gov.uk/ukpga/1967/10/contents
3. www.gov.uk/government/organisations/forestry-commission/about/access-and-opening
4. www.gov.uk/guidance/tree-felling-overview

Section 1.1

5. www.gov.uk/government/publications/the-uk-forestry-standard

Section 2

6. www.legislation.gov.uk/ukpga/1967/10/section/9
7. www.legislation.gov.uk/uksi/1979/792/contents/made

Section 2.1

8. www.legislation.gov.uk/uksi/1999/2228/contents/made

Section 2.6

9. www.legislation.gov.uk/uksi/2005/2517/contents

Section 3

10. www.gov.uk/guidance/manage-and-protect-woodland-wildlife

Section 3.1

11. www.legislation.gov.uk/ukpga/1981/69
12. www.legislation.gov.uk/uksi/2017/1012/contents/made
13. www.assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/717302/v.6_EPSW_A6_booklet_2018.pdf

14. www.gov.uk/guidance/manage-and-protect-woodland-wildlife
15. assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/697613/eps-checklist-v4.pdf
16. www.gov.uk/guidance/wildlife-licences

Section 3.11

17. assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/697615/OSAGuideFinal.pdf
18. www.gov.uk/government/organisations/forestry-commission/about/access-and-opening#area-offices

Section 3.1.2

19. www.gov.uk/government/organisations/natural-england
20. www.bats.org.uk

Section 3.2

21. www.gov.uk/guidance/local-access-forums-participate-in-decisions-on-public-access
22. www.gov.uk/right-of-way-open-access-land/use-your-right-to-roam
23. www.gov.uk/guidance/open-access-land-and-the-coastal-margin-how-to-restrict-public-access

Section 3.3

24. www.gov.uk/government/publications/supplementary-notice-of-operations-within-an-sssi
25. historicengland.org.uk/advice/planning/consents/smc

References

Section 3.4

26. www.gov.uk/guidance/countryside-hedgerows-regulation-and-management
27. www.legislation.gov.uk/uksi/1997/1160/contents/made
28. www.gov.uk/government/collections/cross-compliance

Section 4.1

29. www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas
30 www.legislation.gov.uk/uksi/2012/605/made

Section 4.1.5

31. www.gov.uk/guidance/consultation-and-the-public-registers

Section 4.2

32. www.gov.uk/government/publications/the-uk-forestry-standard

Section 4.3

33. www.gov.uk/guidance/create-a-woodland-management-plan

Section 4.4

34. www.gov.uk/guidance/find-a-specific-tree-pest-or-disease
35. www.forestresearch.gov.uk/tools-and-resources/pest-and-disease-resources/ramorum-disease-phytophthora-ramorum/phytophthora-manual-9-licences-move-and-process-wood-trees-ramorum-disease/
36. www.gov.uk/guidance/prevent-the-introduction-and-spread-of-tree-pests-and-diseases
37. www.forestresearch.gov.uk/tools-and-resources/tree-alert/

Section 4.5

38. www.legislation.gov.uk/uksi/1999/2228/contents/made

Section 5.1

39. www.gov.uk/government/publications/forestry-commission-agent-authority-form

Section 5.2

40. www.gov.uk/guidance/apply-online-for-a-felling-licence
41. www.gov.uk/government/publications/felling-licence-online-user-guide-operations-note-45
42. www.gov.uk/guidance/apply-online-for-a-felling-licence

Section 5.3

43. www.forestergis.com/Apps/MapBrowser/
44. magic.defra.gov.uk/MagicMap.aspx
45. www.legislation.gov.uk/uksi/1999/2228/contents/made

Section 6.4

46. www.gov.uk/guidance/consultation-and-the-public-registers
47. www.gov.uk/guidance/use-the-land-information-search
48. www.gov.uk/guidance/consultation-and-the-public-registers

Section 7.2

49. www.legislation.gov.uk/uksi/1999/2228/made

Section 8

50. www.legislation.gov.uk

June 2023



More information

To help protect England's trees and woodland, a felling licence from the Forestry Commission is required to fell most trees. It's an offence to fell trees without a licence if an exemption does not apply.

For more information about tree felling, please visit:
www.gov.uk/guidance/tree-felling-overview

To apply online for a licence to fell growing trees, use the Forestry Commission Felling Licence Online service:
www.gov.uk/guidance/apply-online-for-a-felling-licence

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HOUSING AND PLANNING SCRUTINY SELECT COMMITTEE – UPCOMING MATTERS

2025-26

C=Council; CAB = Cabinet; DEL = Delegated to Committee; INFO = matters for information. Cabinet are responsible for ALL Key Decisions (KD). Some Non-Key Decisions (NKD) can be taken by Cabinet Members outside of/following the meeting. Cabinet member DN Y/N, seeks indication whether the decision is anticipated to be taken by the relevant Cabinet Member following the HPSSC meeting, or whether it is anticipated to go to the next Cabinet meeting for a decision to be taken by the Cabinet as a whole.

DECISION (TITLE)	DESCRIPTION/OUTCOME	C/CAB/ DEL/INFO	KD/NKD	CAB MEMBER DN Y/N	PART 1 OR 2	MEETING DATE	OFFICER IN PERSON ATTENDANCE Y/N
Local Plan Regulation 18B	Community (Reg 18) Consultation materials (including approach to Member Engagement)	CAB				7 October 2025	
Work with the private sector housing market to increase housing solution opportunities for our residents	Report detailing work to date with the Private Sector (including revised Landlord Incentive Scheme)						
SCI Update (linked to Reg18B)	To address issues with publishing S106 draft agreement						
Matters Arising from Services in between cycles:							
Work Programme							

DECISION (TITLE)	DESCRIPTION/OUTCOME	C/CAB/ DEL/INFO	KD/NKD	CAB MEMBER DN Y/N	PART 1 OR 2	MEETING DATE	OFFICER IN PERSON ATTENDANCE Y/N
Review of Fees and Charges 2025/26		CAB	KD	N		2 December 2025	
Review of Conservation Work	Update following Planning Advisory Service review and arrangements with Sevenoaks DC.						
Planning Advisory Service Review of Planning Service	Update following Planning Advisory Service review. Requested by Cllr Davis at HPSSC of 18 March. Consideration of Action Plan	CAB					
Homelessness Strategy	Consideration of draft strategy for consultation	CAB					
New Planning Fee Structure	Consideration of new fee structure	CAB					
Service Management Plans and Resident Management Companies -TBC							
Cabinet Member report	Housing – Cllr R Betts	Info					
Cabinet Member report	Planning – Cllr M Taylor	Info					
Matters Arising from Services in between cycles:							
Work Programme							

DECISION (TITLE)	DESCRIPTION/OUTCOME	C/CAB/ DEL/INFO	KD/NKD	CAB MEMBER DN Y/N	PART 1 OR 2	MEETING DATE	OFFICER IN PERSON ATTENDANCE Y/N
						17 March 2026	
Matters Arising from Services in between cycles:							
Work Programme							
						19 May 2026	
Work Programme							

Future items to be scheduled for scrutiny: Affordable Housing as per O&S of 3 April 2025; Service Management Plans and Resident Management Companies as per HPSSC of 20.5.25

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Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

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The Chairman to move that the press and public be excluded from the remainder of the meeting during consideration of any items the publication of which would disclose exempt information.

ANY REPORTS APPEARING AFTER THIS PAGE CONTAIN EXEMPT INFORMATION

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Any other items which the Chairman decides are urgent due to special circumstances and of which notice has been given to the Chief Executive.

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