



PGAT Governance Report – WD_2025_2241

1. Nature of This Representation (Procedural & Governance)

This representation outlines the findings of a governance assessment concerning the planning application WD_2025_2241. It details unacceptable deferral events, critical policy expectation failures, and issues related to evidence accessibility and completeness.

2. Headline Procedural Position

The assessment identifies multiple unacceptable deferral events and critical policy expectation failures, indicating significant governance and procedural concerns.

3. Unacceptable Outline-Stage Deferrals (Decision-Critical)

1. Infrastructure & Utilities Deferral type: `indicative_only` Rationale: infrastructure is core-required at outline stage; fundamentals appear deferred (`indicative_only`).

Source file: 13146_Site_A-B-C_FRA_Rev_3_BOUND_Part1.txt

Location: Heading: 5.1 Surface water runoff should be discharged in accordance with the following hierarchy: | Offset: 25022-25383 (normalised)

Excerpt: a feasibility study has been undertaken to assess what would be required to achieve a gravity connection to the river teise via a new surface water sewer in bayham road. an indicative route layout and long section is included in appendix f. 5.13 the feasibility study showed that, in order to achieve a gravity connection from site a lowest point, up to 4m deep

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- Explains Local Plan infrastructure capacity as a statutory decision gate (paras 6.167–6.168).
- Local Plan infrastructure capacity as a decision gate —
https://pgat.co.uk/the_local_plan.php#section1

2. Highways & Transport Deferral type: `reserved_matters` Rationale: highways is core-required at outline stage; fundamentals appear deferred (`reserved_matters`).

Source file: 25-WDC-2241_-_TUNBRIDGE_WELLS_RUGBY_FOOTBALL_CLUB_FRANT_ROAD_AND_LAND_OFF_BAYHAM_ROAD_TUNBRIDGE_WELLS_AND_CHASE_FARM_FRANT_ROAD_FRANT_-_WD-2025-2241-MAJ.txt

Location: Heading: MR JUSTICE FOSKETT | Offset: 386826-387229 (normalised)

Excerpt: on has first been granted by the local planning authority. 23. the first reserved matters application submitted pursuant to this permission (or, in the case of phased development, the first reserved matters application in respect of the relevant phase) shall include a detailed archaeological mitigation strategy for the respective area(s). the strategy shall be based upon the results of a programme of

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Location: Heading: 2 Marsham Street | Offset: 429708-430118 (normalised)

Excerpt: range of options for accessing the town centre by sustainable means (on foot, cycling and by bus) would exist and would be developed further as the details of the development are worked up at the reserved matters stage. mr burbridge also explained that the assumptions in the traffic modelling were conservative and clearly had sufficient headroom to accommodate the various other developments consented in the

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Location: Heading: Summary of Recommendation: The appeal be allowed. | Offset: 480324-480728 (normalised)

Excerpt: ntrol over the impact of the development on nearby centres. 23. the first reserved matters application submitted pursuant to this permission (or, in the case of phased development, the first reserved matters application in respect of the relevant phase) shall include a detailed archaeological mitigation strategy for the respective area(s). the strategy shall be based upon the results of a programme of

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5. Highways & Transport Deferral type: reserved_matters Rationale: highways is core-required at outline stage; fundamentals appear deferred (reserved_matters).

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6. Highways & Transport Deferral type: indicative_only Rationale: highways is core-required at outline stage; fundamentals appear deferred (indicative_only).

Source file:

403.065822.00001_Tunbridge_Wells_Site_A_B_C_Noise_Assessment_02.txt

Location: Heading: Table 3-1: Planning Practice Guidance Noise Exposure Hierarchy Table | Offset: 33893-34299 (normalised)

Excerpt: ice guidance (ppg-noise) and other authoritative sources of guidance. propg has been noted to advocate two sequential stages. stage 1 comprises an 'initial noise risk assessment undertaken based on indicative external noise levels at the existing site, without accounting for the impact of any new or additional mitigation measures that may subsequently be included in development proposals. figure 1 of pr

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7. Highways & Transport Deferral type: indicative_only Rationale: highways is core-required at outline stage; fundamentals appear deferred (indicative_only).

Source file:

403.065822.00001_Tunbridge_Wells_Site_A_B_C_Noise_Assessment_02.txt

Location: Heading: Table 3-1: Planning Practice Guidance Noise Exposure Hierarchy Table | Offset: 34159-34502 (normalised)

Excerpt: nting for the impact of any new or additional mitigation measures that may subsequently be included in development proposals. figure 1 of propg relates the increasing risk of adverse effect against indicative daytime noise levels (laeq,16hr) and night- time noise levels (laeq,8hr) without noise mitigation. this is recreated in figure 3-1. 13

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8. Highways & Transport Deferral type: `indicative_only` Rationale: highways is core-required at outline stage; fundamentals appear deferred (`indicative_only`).

Source file: `Air_Quality_Assessment.txt`

Location: Heading: 27 EPIC (previously EPUK) & IAQM, Land-Use Planning and Development Control: Planning for Air Quality v1.2, | Offset: 40695-41082 (normalised)

Excerpt: traffic data was provided by i-transport, the project's transport consultant. to inform the spatial extent of the model, changes in traffic volumes on the local road network were compared to the 'indicative criteria for assessment' provided by epic & iaqm guidance. these are as follows: • outside of an aqma: o a change of light-duty vehicle (ldv) flows of >500 as 24-hour annual averag

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9. Highways & Transport Deferral type: `indicative_only` Rationale: highways is core-required at outline stage; fundamentals appear deferred (`indicative_only`).

Source file: `Air_Quality_Assessment.txt`

Location: Heading: 28 National Highways, DMRB, LA 105 - Air Quality (Vertical Barriers), v0.1.0, (2024). | Offset: 41671-42077 (normalised)

Excerpt: heir individual contributions being represented within the appropriate background datasets. for those links where distributed operational phase proposed development trips fall below the epic & iaqm indicative criteria for assessment, it can be concluded that at adjacent receptor locations trips will result in an 'insignificant' effect on air quality. there is limited data available on the trip generatio

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10. Highways & Transport Deferral type: `indicative_only` Rationale: highways is core-required at outline stage; fundamentals appear deferred (`indicative_only`).

Source file: `ITB19600-004C_Transport_Assessment_Land_at_Chase_Farm_Part1.txt`

Location: Heading: 4.12.11 On this basis, safe and suitable access is proposed, and the site will meet relevant design | Offset: 116272-116547 (normalised)

Excerpt: ment. the illustrative masterplan for the site is included in section 4 of this transport assessment. the indicative design for the site permeability.



does the development shows a commitment to genuine permeability development prioritise across the site for pedestrians and c

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11. Highways & Transport Deferral type: reserved_matters Rationale: highways is core-required at outline stage; fundamentals appear deferred (reserved_matters).

Source file:

ITB19600-004C_Transport_Assessment_Land_at_Chase_Farm_Part4_REDACTED.txt

Location: Heading: 558006137125 Officer details | Offset: 38036–38412 (normalised)

Excerpt: e. ■ road adoption would be secured though a s38 agreement with escc. the extent of the highway adoption would have to be agreed and would depend on the emerging layout at detail/reserved matters stage. a full safety audit on the internal road layout should also be completed along with agreed lighting and highway drainage proposals. 6.the likely trip generation of the exist

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12. Drainage & Flood Risk Deferral type: by_condition Rationale: drainage_flood is core-required at outline stage; fundamentals appear deferred (by_condition).

Source file: REDACTED_Green_Weald_Alliance_CIC_Objection_Letter_WD_2025_2241_MAJ_Final.docx.txt

Location: Heading: Figure 1: Ditch outfalls and surface-water flow pathways | Offset: 117133–117509 (normalised)

Excerpt: at the chase farm proposals rely on extensive ground re-engineering, unresolved drainage assumptions and deferred technical assessment. these are not matters capable of resolution by condition, but fundamental constraints arising from site geology, groundwater conditions and environmental sensitivity. 6.25■ the national planning policy framework is clear that where essentia

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13. Infrastructure & Utilities Deferral type: indicative_only Rationale: infrastructure is core-required at outline stage; fundamentals appear deferred (indicative_only).

Source file: St_Marks_Recreation_Ground_Land_Off_Bayham_Road_and_Chase_Farm_-GWA_representations_vf.txt



Location: Heading: Figure 3: Map showing the boundary of Wealden District (and WDSC plan area) in | Offset: 42908-43297 (normalised)

Excerpt: cation site falls within the high weald aonb (national landscape). 3.30. the emerging local plan identifies "land off bayham road" as a proposed housing allocation (reference fr2), with an indicative capacity of 100 dwellings. this allocation coincides with site area a of the current planning application and with shela site 755/1610, which is considered by wdc as suitable and deliverable

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14. Highways & Transport Deferral type: indicative_only Rationale: highways is core-required at outline stage; fundamentals appear deferred (indicative_only).

Source file: TWL-BPTW-XX-XX-DO-0608-C01_Low_Res_Compressed_Part1_REDACTED.txt

Location: Heading: 12.5 TWRFC Landscape Concept Strategy 117 | Offset: 2981-3167 (normalised)

Excerpt: materials palette 129 2.8 hamlet settlement analysis 22 6.10 farmstead character 51 12.18 indicative tree strategy 130 2.9 farmstead settlement analysis 23 10.0 access strategy 100

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15. Highways & Transport Deferral type: indicative_only Rationale: highways is core-required at outline stage; fundamentals appear deferred (indicative_only).

Source file: TWL-BPTW-XX-XX-DO-0608-C01_Low_Res_Compressed_Part4.txt

Location: Heading: ST MARKS ROAD | Offset: 7606-7894 (normalised)

Excerpt: ndian sandstone patios and access paths 129 // edla // tunbridge wells rugby club redevelopment - design & access statement 12.18 indicative tree strategy landscape buffer and parkland trees field maple (acer campestre) common oak (quercus robur) hornbeam (carpinus betulus) wild cherry (

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4. Critical Policy Expectation Failures



General / Cross-cutting — HIGH (systemic_governance_exposure) Reason: Multiple decision-critical procedural failures identified across core topics, increasing governance and decision exposure. Procedural principle engaged:

- Governance risk and decision exposure —
https://pgat.co.uk/governance_risk_and_decision_exposure.php#section1

5. Evidence Accessibility & Completeness Issues

No issues related to stubbed or unreadable evidence have been identified.

6. Why These Issues Cannot Be Cured by Conditions

The identified deferral events and failures indicate fundamental constraints that cannot be resolved through conditions, as they relate to core requirements at the outline stage.

7. Procedural and Governance Implications

The findings highlight significant procedural and governance implications, necessitating careful consideration of the decision-making process and the adequacy of the evidence presented.

8. Closing Context

This representation serves to inform the local authority of the procedural and governance concerns identified in relation to the planning application WD_2025_2241.