

Examination of the Tunbridge Wells
Borough Local Plan

Tunbridge Wells Borough Council
Hearing Statement

**Matter 9: Other Matters and Main
Modifications Necessary for
Soundness**

**Issue 2: Local Green Space
Designations**

Document Reference: TWLP/145



Contents

Matter 9 – Other Matters and Main Modifications Necessary for Soundness	3
Issue 2 – Local Green Space Designations	3
Inspector’s Question 1: [re. Submission of Sites].....	3
TWBC response to Question 1	3
Conclusion	7
Appendix 1: Proposed Amendment to Appendix 2 of Submission Local Plan: Schedule of Designated Local Green Space Sites Within Tunbridge Wells Borough	10

Matter 9 – Other Matters and Main Modifications Necessary for Soundness

Issue 2 – Local Green Space Designations

Inspector’s Question 1: [re. Submission of Sites]

At the Stage 2 hearing sessions, the Council confirmed that not all Local Green Space designations had been put forward by the local community. Are areas of Local Green Space justified where this is this case? Is it a requirement in order for Local Green Spaces to be found sound?

TWBC response to Question 1

Introduction

1. The Council notes that a similar question was discussed under Question 2 of the Matter 13, Issue 5 Hearing Session on 13 July 2022 [[TWLP_072](#)] which should be read in conjunction with this response. For thoroughness, however, the Council has re-provided a full response to the question above within this Hearing Statement.
2. As explained below there is no requirement in national policy or policy guidance that proposed Local Green Spaces (LGS) are put forward by the local community and nor is it a test of soundness that LGS are thus proposed.
3. The Council deliberately took a proactive approach to LGS designations as it was a new type of designation and local community groups were varied in their engagement with planning matters at that time (2017) as explained in our previous hearing statement [TWLP_072](#). The mere fact that a site was originally put forward as a suggestion by the Council does not prevent it from being “demonstrably special to the local community”, a key test for LGS designation as per paragraph 106 of the National Planning Policy Framework.

4. In total, 173 sites were proposed for designated as a Local Green Space in the Submission Local Plan but a number of these have now been adopted within 'made' Neighbourhood Development Plans. Of these 173 sites, 4 sites were submitted by Borough Councillors, 1 site was a member of the public suggestion, 81 were planning officer suggestions, and 87 were local Parish/Town Council suggestions. It is understood that the Question relates primarily to the sites originally submitted by way of a planning officer suggestion for the original Regulation 18 Draft Local Plan consultation in 2019.
5. It is noted that [National Planning Policy Framework](#) (NPPF) paragraph 105 states that *"the designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them."* The [Planning Practice Guidance](#) (PPG) states that *"anyone who wants an area to be designated as Local Green Space should contact the local planning authority about the contents of its local plan or get involved in neighbourhood planning"* (paragraph: 006 Reference ID: 37-006-20140306; TWBC emphasis underlined). Consequently, the PPG does not specify nor provide restrictions on who may submit a site for consideration, nor does it explicitly exclude Local Planning Authorities from being included within, or submitting sites on behalf of, the local community. This is discussed further below, while noting that **all sites have been consulted on with local communities**, regardless of whether put forward initially by different sources.

Consideration

6. As discussed within the Council's previous Hearing Statement, as an entirely new Policy, the Council needed to establish a list of possible sites that it could consult on and scope the extent of work required to bring the Policy forward in a new Local Plan. The Council did this through contacting Parish and Town Councils and, where they existed, NDP groups and, within Royal Tunbridge Wells, the Town Forum from as early as March 2017.
7. The Council have thoroughly engaged with local communities on all sites put forward by the Council, all of which have subsequently been supported by such local community groups. Initial responses to the Councils first request for nominations were mixed which was partly due to a possible lack of awareness of the Local Plan process at that time in some parishes, with uncertainty arising from what was an entirely new designation and capacity for the parish or NDP groups to respond fully within the time frame. In areas

where a response was not forthcoming or was limited, and to ensure that sites were not inadvertently missed and therefore not consulted on in preparation for or at Regulation 18, officers with extensive knowledge of the borough (from working 20 years + in the planning department) also added sites that they thought were likely to qualify based on local knowledge and available information as explained below.

8. Prior to the Regulation 18 consultation the draft policy and full list of sites went through the Councils internal member consultation and decision-making process of Planning Policy Working Group, Cabinet Advisory Board and Cabinet so that Members from all parts of the borough were fully appraised of the proposed policy and sites.
9. Sites were put forward for assessment and consideration by Council officers as a result of a review of the Councils evidence base and internal settlement focused discussions. All of these sites (145 in total: see Appendix 1, Table 2 of [TWLP_072](#) for full list) were included in discussions with Parish and Town Councils and Neighbourhood Development Plan (NDP) groups during 2018 and the Town Forum with some follow up meetings in 2019. Discussions included asking whether the sites, put forward from any source, were considered demonstrably special as required by the NPPF and of particular importance to local communities.
10. All sites including those put forward by the Council and which continued to have the support of the local community were included in the Regulation 18 Local Plan consultation. The remainder of sites were submitted by Parish and Town Councils (235 sites), Councillors (five), and member of public suggestions (four). A number of these sites put forward by the Council for consideration have since been proposed and put forward in local NDPs, including some which are now 'made' and/or have received an Examiner's Report (discussed further below).
11. Having established a long list of sites all were assessed using the LGS Designation Methodology. Only 55.87% (81 out of 145) of sites initially suggested by the Council were considered to meet the Council's designation criteria as outlined within the LGS Designation Methodology document [[CD 3.108b](#)] and gained the support of local communities. The full justifications and reasonings for proposing these 81 sites can be found within the LGS Assessment document [[CD 3.108a](#)].

12. Bullet point 6 in paragraph 7(b) of Appendix 2 of the Designation Methodology document [\[CD 3.108b\]](#) notes that, where officer suggestions “*received significant objections, these sites have been reviewed and generally removed from proposed LGS designation unless they also received comments in support, which has required further consideration*”. The Council therefore considers that an appropriate approach has been made to these sites.
13. It is important to note that the Council has thoroughly engaged with, and have had the support of, local communities throughout the plan-making process (dating back to 2017) on all 81 proposed sites put forward by the Council (in addition to all other sites proposed). The extensive engagement which the Council has undertaken is detailed within paragraphs 4.7-4.11 of the Council’s Designation Methodology document [\[CD 3.108b\]](#).
14. It is also important to note that of all the sites put forward by the Council only 9 received any objection and these understandably came from the landowner.
15. In addition, so far 25 of these 81 sites put forward by the Council for consideration have already been designated in ‘made’ NDPs and a further 2 sites have been considered suitable by an Examining Inspector (the Capel NDP at pre-referendum stage). These 27 sites have all been considered demonstrably special and worthy of designation by planning inspectors which shows that the Council’s approach to, and justification for, designating these sites has been justified and appropriate. As acknowledged previously, however, one site put forward by the Council for consideration and which was proposed for designation by the NDP group in the Goudhurst NDP was not considered suitable for designation by the planning inspector (site 102). It is added that, since the previous Hearing Statement, a further site in Capel which was originally put forward by the Parish Council (site AS_65) has not been found suitable by the Examining Inspector (while noting that, as above, this NDP is yet to be adopted).
16. The Council considers it an appropriate approach to remove all sites proposed in parishes which are now either 1) designated within a ‘made’ NDP, 2) have been considered suitable or not suitable by an Examining Inspector prior to formal adoption of an NDP (e.g., Capel), and 3) had not been put forward for proposed LGS designation in a ‘made’ NDP. Of the 173 sites proposed in the Submission Local Plan, 60 sites have now been designated in a ‘made’ NDP, 2 sites have been considered suitable by an Examining

Inspector prior to referendum, 1 site has not been considered suitable by an Examining Inspector prior to referendum, 1 site was not considered suitable by an Examining Inspector and therefore removed from a now 'made' NDP, and 3 sites proposed in the SLP were not proposed in a now 'made' NDP. All 67 of these sites, as shown in **Appendix 1** as struck through, are proposed for removal from the sites proposed within the Local Plan. While Hawkhurst has an adopted NDP, this was adopted in March 2018 (within the very early stages of considering proposed LGSs, and subject to very minor modifications in April 2020), and therefore it is considered appropriate to designate additional LGSs in Hawkhurst. Paddock Wood, while subject to an adopted NDP, designated only 2 LGSs in addition to those proposed within the Local Plan (and therefore purposely did not duplicate proposed designations), hence it is considered appropriate to continue to propose designation of these sites.

17. The Council therefore proposes to designate the remaining 106 sites as LGS within the borough. Of these 106 sites, only 4 objections have been recorded from the consultations carried out by the Council since 2017. 24 of these 106 sites are located within Royal Tunbridge Wells where one objection has been received against site 217 (Green Space near Sandown Park).
18. It is also added that Royal Tunbridge Wells itself does not have a Parish or Town Council, hence the Council's engagement with local community groups in the town. Given the absence of a Parish or Town Council, however, the Council considers it appropriate to act on the local community's behalf by identifying and consulting on areas proposed for Local Green Space designation. As discussed, the Council has adopted a strict methodology for designation, and all sites put forward are considered to meet the test of demonstrably special to the local community.

Conclusion

19. In conclusion, while some sites were initially put forward by Council Officers for consideration as part of the Local Plan process, all sites proposed have been subject to consultations with elected Members and the local community.
20. The Council is confident that, through the consistent application of its designation methodology, its approach is justified and appropriate. All Parish and Town Councils,

NDP Groups, Councillors, and/or local community groups have been consistently and continually engaged with by the Council and there is support for the Council LGS policy.

21. The Council's approach has been validated in that 33 sites that originally came forward as a result of officer suggestions for areas now within NDPs have now been included within 'made' NDPs (or found suitable by an Examining Inspector prior to referendum/adoption).
22. Finally, it is worth noting that there is no restriction within national planning policy or guidance on the submission of sites by the Local Planning Authority, and the Council considers that it has, through its methodology, provided sufficient evidence that the proposed sites are demonstrably special to the local community and that the proposed designations are as a result considered to be fully justified and the proposed allocations sound.

Appendices

Appendix 1: Proposed Amendment to Appendix 2 of Submission Local Plan: Schedule of Designated Local Green Space Sites Within Tunbridge Wells Borough

Note: It is not proposed that the 'Reason for Removal' or 'Objection Received?' columns are added to Appendix 2 of the Submission Local Plan.

Parish	Settlement	Site Number (see the Local Green Space Assessment for reference)	Site Name	Reason for Removal	Objection Received?
Benenden	<i>Benenden</i>	3	Benenden Recreation Ground	Designated in 'Made' NDP	
		4	Globe Field/Playing Field	Designated in 'Made' NDP	
		AS_41	Catholic Church Grounds	Designated in 'Made' NDP	
		AS_44	Goddards Green	Designated in 'Made' NDP	
		AS_45	New Pond Corner	Designated in 'Made' NDP	Yes
		AS_50	Cherryfields	Designated in 'Made' NDP	
		AS_52	Beacon Field	Designated in 'Made' NDP	
	<i>Iden Green</i>	5	Iden Green Recreation Ground	Designated in 'Made' NDP	
<i>East End</i>	AS_42	East End Cricket Pitch	Designated in 'Made' NDP		
Bidborough	<i>Bidborough</i>	7	Bidborough Recreation Ground (north)		
		AS_69	Brookhurst Field		
		AS_70	Bidborough Recreation Ground (south)		
		AS_74	Alf's Corner		
		AS_75	Green triangle on the High Street		
Brenchley and Matfield	<i>Brenchley</i>	11	Brenchley Memorial Hall Sports Ground	Designated in 'Made' NDP	
		12	Picnic area/viewpoint, Crook Road	Designated in 'Made' NDP	
		14	Market Heath Recreation Ground	Designated in 'Made' NDP	
		15	Jack Verrall Memorial Garden	Designated in 'Made' NDP	
		AS_28	Brenchley War Memorial	Designated in 'Made' NDP	
	<i>Matfield</i>	20	Woodland to north of Wish Court	Designated in 'Made' NDP	Yes
		AS_27	Matfield War Memorial	Designated in 'Made' NDP	

Parish	Settlement	Site Number (see the Local Green Space Assessment for reference)	Site Name	Reason for Removal	Objection Received?
	<i>Petteridge</i>	23	Porters Wood Playing Field, Petteridge	Designated in 'Made' NDP	
Capel	<i>Five Oak Green</i>	25	Five Oak Green Allotments	Found suitable by Examining Inspector Pre-Referendum	
		26	Five Oak Green Recreation Ground	Found suitable by Examining Inspector Pre-Referendum	
	<i>Whetsted</i>	(No sites designated)			
	<i>Tudeley</i>	AS_65	Tudeley Allotments	Not found suitable by Examining Inspector Pre-Referendum	
Cranbrook and Sissinghurst	<i>Cranbrook</i>	36	Rammell Playing Field, Bakers Cross	Designated in 'Made' NDP	Yes
		39	Cranbrook Ball Field	Designated in 'Made' NDP	
		40	Big Side Playing Field, Quaker Lane	Designated in 'Made' NDP	
		42	Frythe Estate Allotments	Designated in 'Made' NDP	
		43a	Oatfield Drive Allotments Site A	Designated in 'Made' NDP	
		43b	Oatfield Drive Allotments Site B	Was not proposed within NDP	
		45	Turner Avenue Recreation Ground	Designated in 'Made' NDP	
		52	Community Orchard, Wilsley Green	Designated in 'Made' NDP	
		55	Crane Valley	Designated in 'Made' NDP	
		58	Golford Cemetery	Designated in 'Made' NDP	
		66	The Long Field	Designated in 'Made' NDP	
		69	The Copse Nature Reserve	Designated in 'Made' NDP	
		75	Quaker Burial Ground	Was not proposed within NDP	
		NS5	Hennicker Pit and Woodland	Designated in 'Made' NDP	
		<i>Sissinghurst</i>	77	Sissinghurst Primary School Nature Reserve	Was not proposed within NDP
		79	King George V Field	Designated in 'Made' NDP	
	80	Jubilee Field Recreation Ground	Designated in 'Made' NDP		

Parish	Settlement	Site Number (see the Local Green Space Assessment for reference)	Site Name	Reason for Removal	Objection Received?
		85	Green at Hovendens	Designated in 'Made' NDP	
		87	Green at Cleavers	Designated in 'Made' NDP	
Frittenden	<i>Frittenden</i>	93	Frittenden Playground		
		94	Frittenden Recreation Ground		
Goudhurst	<i>Goudhurst</i>	99	The Old Cricket Pitch	Designated in 'Made' NDP	
		401	Goudhurst Green Field (west of North Road)	Designated in 'Made' NDP	
		402	Goudhurst Green Field (north of Church Road)	Not Found Suitable by Examining Inspector	Yes
		403	Tattlebury Triangle	Designated in 'Made' NDP	
		AS_16	Informal Green Space Between Mary Day's and Balcombes Lane	Designated in 'Made' NDP	
		AS_18	Informal green space adjacent to Culpepers	Designated in 'Made' NDP	
		AS_19	Recreation Ground (Hilliers Ground), Lurkins Rise	Designated in 'Made' NDP	
		AS_22	Lower Globe Field	Designated in 'Made' NDP	
	<i>Kilndown</i>	404	Kilndown Quarry Pond	Designated in 'Made' NDP	
		406	Millennium Green	Designated in 'Made' NDP	
		407	The Cricket Pitch	Designated in 'Made' NDP	
	<i>Curtisden Green</i>	AS_4	The Firs Pitch	Designated in 'Made' NDP	Yes
		AS_3	Green triangle area by Curfew Cottage	Designated in 'Made' NDP	
Hawkhurst	<i>Hawkhurst</i>	108	St. Laurence Church Green verge		
		109	The Moor and verges		
		112	Queens Road opposite Park Cottages		
		113	Sawyers Green		
		114	Philpotts Cross		
		116	Stream Lane Nature Reserve and Pond		
		122	Horns Corner		
		123	Gill's Green including Green Bank and Steps		
		124	Land at Four Wents (Potter Lane & Attwater Lane)		
		125	Lightfoot Green		
		128	Fowler's Wood		

Parish	Settlement	Site Number (see the Local Green Space Assessment for reference)	Site Name	Reason for Removal	Objection Received?
		133	Ockley Lane Allotments		
		AS_26	Talbot Road Allotments		Yes
Horsmonden	<i>Horsmonden</i>	136	Horsmonden Sports Ground	Designated in 'Made' NDP	
		137	Locket Green	Designated in 'Made' NDP	
		138	Furnace Pond	Designated in 'Made' NDP	
		AS_39	Green space in Bassets Farm	Designated in 'Made' NDP	
Lamberhurst	<i>Lamberhurst</i>	142	Chequers Field (Cricket Field) and Playing Fields	Designated in 'Made' NDP	
		AS_33	Victoria Walk and War Memorial	Designated in 'Made' NDP	
		AS_34	Brewer Street North Allotments	Designated in 'Made' NDP	
		AS_36	The Slade Allotments	Designated in 'Made' NDP	
Paddock Wood	<i>Paddock Wood</i>	145	Green Space within Church Farm Development		
		146	Green Space within Mascalls Court Development		
		147	Paddock Wood Cemetery		
		148	St. Andrews Recreation Ground		
		150	Recreation Ground and Memorial Park, Maidstone Road		
		151	Putlands Leisure Centre Field		
		152	Playground, The Ridings		
		153	Playground, Fuggles Close		
		154	Green space in development south of Badsell Road		
		155	Paddock Wood Allotments south of Badsell Road		
		159	Paddock Wood Allotments north of Badsell Road		
		161	Green space, south of Green Lane		
		162	Green space, north of Green Lane		
		165	Green space on Ringden Avenue		
167	Green space north of Tutsham Way				

Parish	Settlement	Site Number (see the Local Green Space Assessment for reference)	Site Name	Reason for Removal	Objection Received?
		168	Green space/rest area on Cogate Road		
		169	Green space on Cobbs Close		
		170	Green space/rest area on Commercial Road		
		172	Green Space/rest area on Maidstone Road		
		175	Paddock Wood Allotments, Courthope		
		176	Green space at The Granary		
		177	Church Road Cemetery		
		178	Green Lane Recreation Ground		
		179	Green space with ponds on Church Road		
		181	Green space at Newton Gardens		
		183	Green space adjacent to Railway Bridge		
		AS_55	Clover Way Playground		
		AS_66	Field north of Foal Hurst Wood		
		AS_68	Green corridor adjacent to Poppy Meadow		
Pembury	<i>Pembury</i>	186	Pembury Allotments	Designated in 'Made' NDP	
		187	Pembury Green Space for Properties	Designated in 'Made' NDP	
		188	Pembury Cricket Ground	Designated in 'Made' NDP	
		189	Woodside Recreation Ground	Designated in 'Made' NDP	
		AS_4	Lower Green Recreation Ground	Designated in 'Made' NDP	
		AS_9	Belfield Road	Designated in 'Made' NDP	
		AS_13	Lower Green Burial Ground	Designated in 'Made' NDP	
Royal Tunbridge Wells	<i>Royal Tunbridge Wells</i>	194	Oak Road Green Space		
		197	Great Culverden Parkland		
		198	Summervale Road		
		199	Playground and Green near St. Mark's Church of England Primary School		
		202	Green Square on Boundary Road, Hawkenbury		
		203	Camden Park		

Parish	Settlement	Site Number (see the Local Green Space Assessment for reference)	Site Name	Reason for Removal	Objection Received?
		204	Farmcombe Road Open Space		
		205	Playing field next to Nevill Cricket Ground		
		206	Hilbert Road Allotments		
		207	Park/playground in Sherwood		
		208	High Brooms Village Green		
		210	Hawkenbury Recreation Ground		
		211	Nevill Cricket and Athletic Ground		
		212	Playground, Banner Farm		
		215	Cadogan Playing Field		
		216	St. John's Park		
		217	Green space near Sandown Park		Yes
		221	Green Area, Knights Park, just south of Golding Road and The Avenue		
		222	Ramslye Allotments		
		223	Hawkenbury Allotments		
		AS_25	Sandhurst Road Allotments		
		AS_80	St John's Meadows		
		AS_82	Wooded Area behind Summervale Road		
		NS2	Reynolds Lane Allotments		
Rusthall	<i>Rusthall</i>	224	Mary Caley Park		
		226	Rusthall green space, Colbran Way		Yes
		227	Rusthall Woodland, north of Tunbridge Wells Golf Course		
		229	Rusthall Allotments, Southwood Road		
		230	Wickham Garden Allotments		
		231	Tunbridge Wells Golf Course		
Sandhurst	<i>Sandhurst</i>	234	Sandhurst Green Space		
		235	Sandhurst Recreation Ground		
Southborough	<i>Southborough</i>	236	Southfields Park, Skinners School		
		237	Copse of trees, Yew Tree Road		
		238	Playing Fields and Allotments, Ridgeway		
		239	Southborough Allotments		

Parish	Settlement	Site Number (see the Local Green Space Assessment for reference)	Site Name	Reason for Removal	Objection Received?
			at the end of Oak End Close		
		240	Playground at the end of Holden Corner		
		241	Neighbourhood Green, Woolley Road		
		242	Neighbourhood Green, Lady's Gift Road		
		243	The Rest Garden		
		244	Frank Weare Recreation Ground, Salisbury Road		
		245	Pennington Grounds		
		246	Southborough Cemetery, north of Victoria Road		
		251	High Brooms Allotments		
		AS_83	Green space on Powder Mill Lane		
Speldhurst	<i>Speldhurst</i>	256	Pocket Park		
		258	Speldhurst Recreation Ground		
		259	Speldhurst Allotments		
		265	Rusthall Playground		
		266	Rusthall Extension Allotments		
		AS_32	Farnham Lane Cemetery		
	<i>Langton Green</i>	271	Langton Green Recreation Ground		
		274	Land to south of Langton Road		
		AS_61	Green space on The Boundary Road		
		AS_62	Green space with pond on The Boundary Road		
		AS_76	Allotments south of crossroads joining Ashurst Road, Langton Road, and the B2110		
	<i>Groombridge</i>	(No sites designated)			
	<i>Ashurst</i>	AS_63	Ashurst Sports Ground		Yes