

Examination of the Tunbridge Wells  
Borough Local Plan

**Tunbridge Wells Borough Council  
Hearing Statement**

**Matter 13: Landscape, Local  
Green Space and Open Space,  
Sport and Recreation (Policies  
STR8, EN8, EN15, EN16, EN17,  
EN18, EN19, OSSR1 and OSSR2)  
Issue 5: Local Green Space**

Document Reference: TWLP/072



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## Introduction

1. The Council would like to draw the Inspector's attention to Policy STR10 in the Submission Local Plan (SLP) [[CD 3.128](#)] and its supporting text which states, in paragraph 4.146, that *"it is the Council's intention that Local Plan policies will not cover matters contained within a neighbourhood plan where the latter has progressed to having the benefit of an Examiner's Report before the Local Plan is submitted, where those matters are specific to the area of the neighbourhood plan. If this situation arises post-submission of the Local Plan and prior to completion of the examination, the Council may seek to withdraw relevant Local Plan policies through proposed modifications"*.
2. Given the above, the Council notes that two Neighbourhood Development Plans (NDPs) have been adopted post-submission of the Local Plan (Goudhurst and Benenden NDPs), and one further NDP has received an Examiner's Report (Brenchley and Matfield NDP). Lamberhurst's NDP was also 'made' in the month prior to submission.
3. As paragraph 4.136 and Policy STR10 of the SLP explain, NDPs when 'made' form part of the statutory development plan for the borough, and as such the Council must have regard to such NDP policies when assessing planning applications. Regard must therefore also be given to where the SLP may now be duplicating NDP Policies.
4. Therefore, in accordance with this Policy, it is considered that a number of the proposed Local Green Spaces (LGSs) in the SLP are now duplicating NDP Policies, and so a Modification is proposed to remove from the SLP list of LGS sites those sites which are now adopted in 'made' NDPs and/or found suitable for designation in an Examiner's Report. These sites are crossed out and highlighted in red within **Appendix 2** and **Table 3** and furthered referenced within the Council's answers to questions below, and in particular Question 8.

# Matter 13 – Landscape, Local Green Space and Open Space, Sport and Recreation (Policies STR8, EN8, EN15, EN16, EN17, EN18, EN19, OSSR1 and OSSR2)

## Issue 5 – Local Green Space

**Note:** The Inspector may find it helpful to view the Local Green Space Interactive Map [[CD3.108c](#)]

### Inspector’s Question 1: [re. LGSs within the Green Belt]

*The PPG advises that if land is already protected by Green Belt policy, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space. Which sites designated as Local Green Spaces in the Plan are also within the Green Belt? For those sites, what consideration has been given to the additional local benefit of their designation?<sup>1</sup>*

### TWBC response to Question 1

#### Introduction

1. The Council acknowledges that the [Planning Practice Guidance](#) (PPG) states that, “if land is already protected by Green Belt policy ... then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space”. The PPG adds that “one potential benefit in areas where protection from development is the norm (eg villages included in the green belt) but where there could be exceptions is that the Local Green Space designation could help to identify areas

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<sup>1</sup> Paragraph: 010 Reference ID: 37-010-20140306

that are of particular importance to the local community” (see Paragraph: 010 Reference ID: 37-010-20140306).

- There are a number of Green Belt sites proposed for designation as Local Green Space (LGS), the reasoning and justification of which is provided within the Council’s response below.

### Consideration

- The Council’s LGS Assessment document [[CD 3.108a](#)] assesses all sites which were considered for LGS designation within the Local Plan under Policy EN15. This assessment was undertaken in accordance with the Council’s designation methodology outlined within the LGS Designation Methodology document [[CD 3.108b](#)]. In total, 389 sites were assessed for possible LGS designation, of which 173 are proposed for designation (and 216 are not proposed for designation).
- Out of the 389 sites considered, only 84 sites included an element of Green Belt (69 wholly, six partly (between 3-45%), and nine mostly (between 55-99%)). Of these 84 sites, only 24 (28.6%) sites have been proposed for designation, whereas 60 (71.4%) have not been proposed for designation. The sites with an element of existing Green Belt protection which are proposed for LGS designation are listed below in **Table 1**.

**Table 1 - Sites Proposed for LGS Designation Within the Green Belt**

Site Reference	Site Name	Parish	Green Belt Extent (%)	Note Within the LGS Assessment Document [CD 3.108a]
AS_69	Brookhurst Field	Bidborough	100%	<i>While this area may have similar characters to other sites not proposed for designation, this area is of particular local significance because of its richness in wildlife, including butterflies, plants, etc., and is managed to retain the flora and fauna onsite for access by all parishioners for leisure and school. It is also accessible by a public right of way which runs along the boundary of the area, linking the settlement with the wider countryside as well as toward Southborough.</i>
AS_70	Bidborough Recreation Ground (South)	Bidborough	100%	<i>This area is used for formal and informal recreation by the local community. This area is also managed by the Bidborough Sports Association on behalf of the Parish Council and village. Along with the northern part of the area, it is the only recreation ground within the settlement and is therefore particularly valued by the local community.</i>

Site Reference	Site Name	Parish	Green Belt Extent (%)	Note Within the LGS Assessment Document [CD 3.108a]
AS_74	Alf's Corner	Bidborough	100%	<i>This area is owned and managed by the Parish Council. The Parish Council maintains it by replacing flowers, shrubs, and hedging as and when it is necessary. Maintenance also ensures that the surfacing is safe, and that the area is kept generally tidy for use by members of the parish. This area is considered a very small but well-loved area of seating for local parishioners.</i>
25	Five Oak Green Allotments	Capel	100%	<i>This area is used for informal recreation by the local community (i.e. gardening) and is centrally located with the village which contributes to its character/setting and local visual amenity. It is also the only allotment gardens used by the local community that is located within Five Oak Green and is therefore considered important to protect for the local community's continued future use.</i>
26	Five Oak Green Recreation Ground	Capel	100%	<i>This area is a recreational open space that is used for informal recreation by the local community (inclusive of the village hall, sports pavilion, football pitch, cricket ground, and a sports court). It is the only recreation ground within the settlement and is therefore particularly valued by the local community.</i>
AS_65	Tudeley Allotments	Capel	100%	<i>This area is used for informal recreation by the local community (i.e. gardening). It is also the only allotment gardens used by the local community that is located within Tudeley and is therefore considered important to protect for the local community's continued future use.</i>
155	Paddock Wood Allotments South of Badsell Road	Paddock Wood	36%	<i>This area is used for informal recreation by the local community (i.e. gardening) and forms an attractive approach to the settlement. This area is considered important to protect for the local community's continued future use. Note: approximately half of this area also crosses into Capel Parish.</i>
AS_66	Field North of Foal Hurst Wood	Paddock Wood	45%	<i>This area is of particular local significance because of its richness of wildlife (inclusive of a pond and adjacent to a local wildlife site). The area is also publicly accessible from the south of the area (from Foalhurst Wood) and is used for informal recreation by the local community. Although well - screened by hedgerows, its open character provides an attractive approach to the settlement.</i>
186	Pembury Allotments	Pembury	100%	<i>This area is used for informal recreation by the local community (i.e. gardening). It is also the only allotment gardens used by the local community that is located within Pembury and is therefore considered important to protect for the local community's continued future use.</i>
188	Pembury Cricket Ground	Pembury	100%	<i>This area is a recreational open space, used for formal and informal recreation by the local community (inclusive of a pavilion and cricket ground).</i>

Site Reference	Site Name	Parish	Green Belt Extent (%)	Note Within the LGS Assessment Document [CD 3.108a]
189	Woodside Recreation Ground	Pembury	100%	<i>This area is a recreational open space, used for formal and informal recreation by the local community (inclusive of a pavilion and playing field/football pitch).</i>
210	Hawkenbury Recreation Ground	Royal Tunbridge Wells	6%	<i>This area is part of the neighbourhood centre. The area is a recreational open space, used for formal and informal recreation by the local community (inclusive of a pavilion, play/sports areas, football pitch, tennis courts, gym equipment, and a cricket ground).</i>
217	Green Space near Sandown Park	Royal Tunbridge Wells	100%	<i>While it is acknowledged that this site is partly within a Conservation Area, it is considered that this site benefits from further Local Green Space protection because of its special value to the local community. This site is special to the local community as it is an area of natural beauty that provides an important green space 'gap' between the built development of Royal Tunbridge Wells and Pembury. This site therefore contributes to the character/setting and local visual amenity of the settlement.</i>
223	Hawkenbury Allotments	Royal Tunbridge Wells	100%	<i>This area is used for informal recreation by the local community (i.e. gardening). This site is also the only allotment site within the surrounding area of Royal Tunbridge Wells and is therefore considered important to protect for the local community's continued future use.</i>
227	Rusthall Woodland, North of Tunbridge Wells Golf Course	Rusthall	89%	<i>This area is used for informal recreation by the local community and is accessible via public rights of way running through. This area is also special to the local community as it is an area of natural beauty that provides an important green space route and 'gap' between the built development of Rusthall and Royal Tunbridge Wells. Despite this area already being partly designated as Common Land and Ancient Woodland, these separate designated areas are notably small in relation to the proposed area as a whole, meaning that Local Green Space designation is appropriate. Note: a small part of this area also crosses into Royal Tunbridge Wells</i>
229	Rusthall Allotments, Southwood Road	Rusthall	100%	<i>This area is used for informal recreation by the local community (i.e. gardening). This site is considered by the local community to be critically important to the mental and physical health and wellbeing of its residents of all ages. It is considered important by the local community that these allotments sites are protected from development for both today's residents and future generations.</i>

Site Reference	Site Name	Parish	Green Belt Extent (%)	Note Within the LGS Assessment Document [CD 3.108a]
231	Tunbridge Wells Golf Course	Rusthall	100%	<i>Members of the public are allowed to walk over the private roadway (owned by residents of Rustwick and Rusthall Park), and it is used daily by many. This area is also special to the local community as it is an area of natural beauty that provides an important green space 'gap' between the built development of Rusthall and Royal Tunbridge Wells. It is also used as recreational land by the golf course and is therefore of local significance because of its recreational value. Despite this area already being partly designated as Ancient Woodland, this designated area is notably small in relation to the proposed area as a whole.</i>
246	Southborough Cemetery, North of Victoria Road	Southborough	100%	<i>This cemetery is of particular local historic significance. This area is also of particular local significance because of its richness of wildlife. As the area has no listings, the area benefits from further Local Green Space protection.</i>
265	Rusthall Playground	Speldhurst	100%	<i>The area is a recreational open space, used for informal recreation by the local community. The area is also part of an allocated site in the new Local Plan (although is allocated for additional sports and recreation provision as part of the allocation which is accommodated for within the Local Green Space Policy). Note: while this area is located in Speldhurst Parish, it was submitted by Rusthall Parish Council.</i>
266	Rusthall Extension Allotments	Speldhurst	25%	<i>This area is used for informal recreation by the local community (i.e. gardening). This site is considered by the local community to be critically important to the mental and physical health and wellbeing of its residents of all ages. It is considered important by the local community that these allotments sites are protected from development for both today's residents and future generations. Note: while this area is located in Speldhurst Parish, it was submitted by Rusthall Parish Council.</i>
271	Langton Green Recreation Ground	Speldhurst	100%	<i>This area is a recreational open space, used for informal recreation by the local community (inclusive of a pavilion, sports court, play area/playground, cricket ground, and football pitches). The area is also the only recreation ground within the settlement and is therefore particularly valued by the local community.</i>
AS_32	Farnham Lane Cemetery	Speldhurst	100%	<i>This area is of particular local significance because of its historical value. As the area has no listings, the area benefits from further Local Green Space protection.</i>



Site Reference	Site Name	Parish	Green Belt Extent (%)	Note Within the LGS Assessment Document [CD 3.108a]
AS_63	Ashurst Sports Ground	Speldhurst	100%	<i>Although this site has restricted public access, this site is highly valued as a recreational space used for a variety of sports (inclusive of two football pitches), children's parties and community events (such as bonfires) located on the edge of Ashurst. It is the only recreation ground within the settlement and is therefore particularly valued by the local community.</i>
AS_76	Allotments South of Crossroads Joining Ashurst Road, Langton Road, and the B2110	Speldhurst	100%	<i>This area is used for informal recreation by the local community (i.e. gardening). It is also the only allotment gardens used by the local community that is located within Langton Green and is therefore considered important to protect for the local community's continued future use.</i>

5. The justifications and reasonings within **Table 1** (as also found in the Council's LGS Assessment document) clearly explain how and why these sites are considered to be demonstrably special to local communities and therefore warrant LGS designation.

6. With regard to the Council's general approach to existing Green Belt protection, Paragraph 2.7 in the Council's LGS Designation Methodology document [CD\_3.108b] states that:

*"Although the NPPF describes protection as similar to that of Green Belt, the Council has treated sites considered for LGS designation within the Green Belt the same as those outside of the Green Belt for the following reasons:*

*1. There are some differences with Green Belt policy; and*

*2. It is important for local communities within the Green Belt to identify areas that are special to them".*

7. In addition, within paragraph 2.8, it is noted that *"the Green Belt, as well as AONB, protection relates to the majority of the borough and so while considering the high level of housing and other needs within the borough, the Council has decided to not exclude considered LGS sites from possible designation (subject to the Council's designation methodology) already protected by these designations"*. This is also reflected within paragraph 13 of Appendix 2 of this methodology document.

8. The Council has therefore sought to assess proposed LGS sites within the Green Belt in a similar way to non-Green Belt sites in accordance with the designation methodology. This approach has consequently allowed all communities within the borough, including those which are wholly within or are surrounded by the Green Belt (as noted as an exception within the PPG), the additional local benefit of being able to identify, and gain a further layer of protection for, green spaces which are demonstrably special to them, and which have particular importance within the local community (regardless of whether they are already protected under existing Green Belt protection).

## **Conclusion**

9. In conclusion, the Council is therefore confident that the approach to, and methodology for, proposing sites for LGS designation within the Green Belt, as well as the justifications and reasonings (provided within **Table 1**) which explain why the Council considers these sites to be demonstrably special to local communities, is robust and justified. All 24 sites protected by an existing element of Green Belt would provide an additional local benefit by giving local communities an opportunity to identify and protect green spaces which are of demonstrable importance to them.

## Inspector's Question 2: [re. origins of sites put forward]

***Paragraph 101 of the Framework states that the designation of land as Local Green Space through local plans allows communities to identify and protect green areas of particular importance to them. Have all the designations been put forward by local communities? If not, which ones have been identified by the Council?***

## TWBC response to Question 2

### Introduction

10. It is noted that paragraph 101 of the National Planning Policy Framework 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) also 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” (Paragraph: 006 Reference ID: 37-006-20140306; TWBC emphasis added).
11. Hence, there does not appear to be any strict rules within the guidance stating who may or who may not put forward a site for consideration. The sites submitted and considered by the Council for potential Local Green Space (LGS) designation have been put forward via a number of different sources which are outlined within the Council's response below. However, it should be noted that **all sites have been consulted on with local communities**, regardless of whether put forward initially by different sources.

### Consideration

12. 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.
13. 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 put down to a possible lack of engagement with 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 also added sites that they thought might qualify based on local knowledge and available information as explained below.

14. 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** 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 and of particular importance to local communities.
15. 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 also 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).
16. 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](#)].
17. 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.

18. 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](#)].
19. It is also important to note that there are no sites proposed which are *not supported by* local parish and town councils, NDP groups, Members, and/or local community groups.
20. In addition, 10 of these 81 sites put forward by the Council for consideration have already been designated in 'made' NDPs (three in Benenden, six in Goudhurst, and one in Lamberhurst), with six considered suitable for LGS designation in an Examining Inspector's Report (in Brenchley and Matfield), having 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. It is acknowledged, however, that 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, discussed further in response to Question 7).

## **Conclusion**

21. In conclusion, while some sites initially put forward by Council Officers for consideration by local communities have subsequently been proposed for LGS designation in the Submission Local Plan, the Council is confident that its approach is justified and appropriate through the consistent application of its designation methodology. All Parish and Town Councils, NDP Groups, Councillors, and/or local community groups have been consistently and continually engaged with by the Council and are in support of all sites put forward by the Council for consideration and which are proposed for

designation. The approach has also been supported through the designation of sites put forward by the Council for consideration within 'made' NDPs.

## Inspector's Question 3: [re. Site 217]

***What is the justification for designating site 217? How is it demonstrably special to the local community?***

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

#### **Introduction**

22. The [Planning Practice Guidance](#) (PPG) states that the “*Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities*” (see Paragraph: 005 Reference ID: 37-005-20140306). As such, the Council has made an assessment (as found within the Council's Local Green Space (LGS) Assessment document [[CD 3.108a](#)]) as to whether the site meets the Council's designation criteria (as outlined within the Council's LGS Designation Methodology document [[CD 3.108b](#)]) and is demonstrably special to the local community. With regard to site 217 (Green Space near Sandown Park), the Council considers that this site meets the designation criteria and is demonstrably special to the local community.

#### **Consideration**

##### Is the Site Demonstrably Special to the Local Community?

23. The Council's LGS Assessment document [[CD 3.108a](#)] outlines the Council's justification and reasoning for all decisions proposing to designate, or not designate, sites submitted and considered for designation. The justification and reasoning for considering that site 217 is demonstrably special to the local community is as follows:

*“While it is acknowledged that this site is partly within a Conservation Area, it is considered that this site benefits from further Local Green Space protection because of its special value to the local community. This site is special to the local community as it is an area of natural beauty that provides an important green space ‘gap’ between the built development of Royal Tunbridge Wells and Pembury. This site therefore contributes to the character/setting and local visual amenity of the settlement”.*

24. The site does not benefit from any form of planning permission, nor is allocated or proposed for development within the emerging Local Plan. The site is not considered to

be an extensive tract of land (at 6.78ha as per the Council's designation methodology) and is in close proximity to Royal Tunbridge Wells given that the site is located adjacent to its Limits to Built Development. It is of note that the eastern boundary is formed by Pembury Road which is the main approach to the town when arriving from the east and south and there is a cycle route along this road so that the area is viewed by a great many people everyday

25. The Council's SHELAA assessment for the site (submitted under site reference 99 in the Council's call for sites – see site assessment sheet on page 69 [[CD 3.77n](#)]) assessed the potential of the site for development. The assessment included the following commentary with regard to its suitability for development:

*“The site is considered unsuitable because of harm that would be caused to the Green Belt if the site were to be released from it, which it is considered would cause high harm. It is also considered that it would harm the setting of the AONB which is adjacent to this site. The site is subject to a number of other constraints including landscape and highways concerns”.*

26. The Sustainability Assessment commentary reflects this, while also noting that “the site forms part of the landscape setting of the main urban area of Tunbridge Wells and helps prevent coalescence between Tunbridge Wells and Pembury” which influenced the negative scores given for heritage and landscape. The site assessment concludes that “there are significant concerns about impact on the landscape and settlement pattern as well as concerns that this would result in coalescence of settlements”, and among other reasons (i.e., Green Belt harm; highways concerns) is therefore not considered to be a suitable site allocation in the Local Plan.
27. Given the above SHELAA assessment, designation of the site as LGS would ensure an added layer of protection against development that limits any harm on the Green Belt or setting of the AONB, as well as the Conservation Area which is partly (11%) within the site. Most importantly, designation would help to prevent coalescence between Royal Tunbridge Wells and Pembury through protecting this area of natural beauty and important green space ‘gap’ that also forms an attractive landscape approach to the settlement. It is therefore considered important that this demonstrably special area to the local community is protected further.



28. It is acknowledged that the landowner objected to the proposed designation of this site as part of the Regulation 19 consultation on the Pre-Submission version of the Local Plan (PSLP\_222). The Council's response to the main issues raised within the objection can be found on pages 380 and 381 of Part 2 of the Consultation Statement for the Submission Local Plan [[CD 3.134b](#)]. The landowner also objected during the Regulation 18 consultation on the Draft version of the Local Plan (DLP\_4440). However, the proposal to designate this site is also supported and agreed by the Royal Tunbridge Wells Town Forum, and the site received a resident's and Councillor's comment in support during the Regulation 18 consultation (DLP\_357 and DLP\_538).
29. As there were objections from the landowner, although support from the local community group and a resident's and Councillor's representation, reference should be given to the Council's approach as per bullet point 4 of paragraph 7(b) of the Council's Designation Methodology document [[CD 3.108b](#)] which states that, "*where objections from landowners have been received and it is not curtilage to a private property, a review of the extent to which the site is demonstrably special to the local community has also been undertaken and a decision on possible designation as LGS has been made, particularly if there are any comments in support which have also been taken into account*". Bullet point 6 also notes that "*where 'in-office 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*".
30. Consequently, while acknowledging that the site's proposed designation was objected to by the landowner, the Council has had regard to the support of the local community. As such, the Council has assessed whether the site meets the designation criteria outlined within its methodology and whether the site is considered to be demonstrably special to the local community. Ultimately, with regard to the above justification and reasoning, the Council considers that this is a site which meets the designation criteria and is demonstrably special to the local community.

## Conclusion

31. In conclusion, the Council considers that this site meets the designation criteria and is demonstrably special to the local community. This green space provides for an

important green space gap that also forms a visually attractive landscape approach in between the settlements of Royal Tunbridge Wells and Pembury. It forms part of an attractive view for those arriving in Tunbridge wells along Pembury Road by car, by bicycle, or on foot. Notwithstanding the objection from the landowner, the Council considers that this site is unsuitable for development and should be designated as an LGS in order to ensure its protection and identification as a green space of particular importance to the local community.

## Inspector's Question 4: [re. Site 20]

*What is the justification for designating site 20? How is it demonstrably special to the local community, and does it represent an extensive tract of land?*

### TWBC response to Question 4

32. The Council refers to the introduction provided to this Hearing Statement as well as its response to Question 8 as well as **Appendix 2** and **Table 3**. This site (20) has been found suitable for Local Green Space (LGS) designation by the Examining Inspector for Brenchley and Matfield's NDP. Therefore, in accordance with STR10 of the Submission Local Plan (SLP) [[CD 3.128](#)], the Council proposes a modification to remove this site to ensure that the SLP is not duplicating NDP Policies.

## Inspector's Question 5: [re. Sites 36 and 40]

***What is the justification for the proposed Local Green Space designations at Cranbrook School (including the playing fields)?***

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

#### **Introduction**

33. The [Planning Practice Guidance](#) (PPG) states that the “*Local Green Space designation is a way to provide special protection against development for green areas of particular importance to local communities*” (see Paragraph: 005 Reference ID: 37-005-20140306). As such, the Council has made an assessment (as found within the Council's Local Green Space (LGS) Assessment document [[CD 3.108a](#)]) as to whether these sites meet the Council's designation criteria (as outlined within the Council's LGS Designation Methodology document [[CD 3.108b](#)]) and are demonstrably special to the local community. With regard to the sites proposed at Cranbrook School, the Council understands this relates to sites 36 (Rammel Playing Field, Bakers Cross) and 40 (Big Side Playing Field, Quaker Lane) as per the objection received by Kember Loudon Williams for Cranbrook School during the Regulation 19 consultation on the Pre-Submission Local Plan (PSLP\_1816). The Council considers that both of these sites meet the designation criteria and are demonstrably special to the local community.

#### **Consideration**

##### Are the Sites Demonstrably Special to the Local Community?

34. The Council's LGS Assessment document [[CD 3.108a](#)] outlines the Council's justification and reasoning for all decisions proposing to designate, or not designate, sites submitted and considered for designation. The justification and reasoning for considering that both sites 36 and 40 are demonstrably special to the local community is as follows:

##### Site 36

*“While this area is partly within a Conservation Area, and that this area is part of a school's private playing fields/has no official public access, this green area is visually prominent to the local community and contributes to the character/setting and local visual amenity of the settlement/surrounding housing development. The school also let*

*the community use the field once a year for the Cranbrook Fun Day. The field is also recognised by the local community as a Memorial Field. The area is only partly within a Conservation Area and therefore benefits from further Local Green Space protection”.*

#### Site 40

*“This area is part of a school’s private playing fields and there does not appear to be any official public access. However, this area is visually prominent to the local community and contributes to the character/setting and local visual amenity of the settlement. It is also of local historical significance, having been used as a cricket field since at least the mid 19<sup>th</sup> century”.*

35. Both sites do not benefit from any form of planning permission, nor are allocated or proposed for development within the emerging Local Plan. The sites are not considered to be extensive tracts of land (at 1.7ha for site 36 and at 4.6ha for site 40 as per the Council’s designation methodology) and are both within close proximity to Cranbrook given that the sites are located either within (site 36) or adjacent (site 40) to its Limits to Built Development.
36. The Council’s SHELAA assessment for site 36 (submitted under site reference 132 in the Council’s call for sites – see site assessment sheet on page 43 [\[CD 3.77f\]](#)) assessed the potential of the site for development. The assessment included the following commentary with regard to its suitability for development:
- “Unsuitable: There are heritage and landscape concerns regarding this site if it were to be allocated”.*
37. The Sustainability Assessment commentary reflects this, having noted that the site *“scores negatively on its heritage score as a result of the contribution the site makes to Conservation Area and its setting. The Landscape Objective also scores negatively as the loss of the site would result in the loss of an historic field in the AONB”.* The site assessment concludes that *“this site is considered unsuitable as a potential site allocation”* due to *“heritage and landscape concerns regarding this site, that is located within the AONB”.*
38. The Council’s SHELAA assessment for site 40 (submitted under site reference 129 in the Council’s call for sites – see site assessment sheet on page 37 [\[CD 3.77f\]](#))

assessed the potential of the site for development. The assessment included the following commentary with regard to its suitability for development:

*“Unsuitable: The area provides a break between the two Conservation Areas (Wilsley Green CA to the east and north-east, and Cranbrook CA to the south-east) as well as providing part of the rural setting for the town, a rural settlement located within the High Weald AONB. Most of this site provides open space and sports provision, the loss of which has not been justified through the promotion of this site. Development of part of the site could compromise the existing use of the wider site area for open space and sports provision”.*

39. The Sustainability Assessment commentary reflects this, having noted that, while a largely sustainable site, the only negatives related to *“the sensitive environmental features such as the rural character of Quaker Lane which would be compromised with development here”*, and that *“a mixed score is applied for the health objective as it was felt that development could compromise use of the field for sports”*. The site assessment concludes that *“this site is considered unsuitable as a potential site allocation”* due to the *“adverse impact on the two nearby Conservation Areas and upon the rural setting of the town located within the AONB”* as well as concern raised regarding the compromised existing sports and open space uses.
40. Given the above SHELAA assessments, designation of the sites as LGS would ensure an added layer of protection against development that protects these important green spaces within Cranbrook which are demonstrably special to the local community. They both provide attractive landscape approaches to the settlement and contribute to the character/setting and local visual amenity of the settlement. Designation would also prevent the loss of any sport provision and recreational use of site 40. Both sites are also of particular historical significance. It is therefore considered important that these demonstrably special areas to the local community are protected further.
41. It is acknowledged that the landowner objected to the proposed designation of these sites as part of the Regulation 19 consultation on the Pre-Submission version of the Local Plan (PSLP\_1816). The Council’s response to the main issues raised within the objection can be found on pages 382 and 383 of Part 2 of the Consultation Statement for the Submission Local Plan [[CD 3.134b](#)]. The landowner also objected during the

Regulation 18 consultation on the Draft version of the Local Plan, albeit only with regard to site 36 (DLP\_6046). However, having also been originally submitted by the Parish Council for consideration, the proposal to designate these sites are also supported and agreed by the Cranbrook and Sissinghurst Neighbourhood Development Plan (NDP) Group, having been proposed for LGS designation in their Regulation 14 version of their NDP (October 2021).

42. As there were objections from the landowner, although support from the local Parish Council and NDP Group, it should be noted that bullet point 4 of paragraph 7(b) of the Council's Designation Methodology document [[CD 3.108b](#)] states that, "*where objections from landowners have been received and it is not curtilage to a private property, a review of the extent to which the site is demonstrably special to the local community has also been undertaken and a decision on possible designation as LGS has been made, particularly if there are any comments in support which have also been taken into account*".
43. Consequently, while acknowledging that the sites' proposed designation was objected to by the landowner, the Council has had regard to the support of the local community. As such, the Council has assessed whether the sites meet the designation criteria outlined within its methodology and whether the sites are considered to be demonstrably special to the local community. Ultimately, with regard to the above justification and reasoning, the Council considers that these sites meet the designation criteria and are demonstrably special to the local community.

## **Conclusion**

44. In conclusion, the Council considers that these sites meet the designation criteria and are demonstrably special to the local community. These green spaces both provide attractive landscape approaches to the settlement and contribute to the character/setting and local visual amenity of the settlement. Designation would also prevent the loss of any sport provision and recreational use of site 40. Both sites are also of particular historical significance. Notwithstanding the objection from the landowner, the Council considers that these sites are unsuitable for development and should be designated as LGSs in order to ensure their protection and identification as green spaces of particular importance to the local community.

## Inspector's Question 6: [re. Site 45]

***Site 45 (New Pond Corner) is situated within a conservation area. What is the justification for its further designation as Local Green Space?***

### **TWBC response to Question 6**

45. The Council refers to the introduction provided to this Hearing Statement as well as its response to Question 8 as well as **Appendix 2** and **Table 3**. This site (AS\_45) has been designated as a Local Green Space (LGS) in Benenden's 'made' NDP. Therefore, in accordance with STR10 of the Submission Local Plan (SLP) [[CD 3.128](#)], the Council proposes a modification to remove this site to ensure that the SLP is not duplicating NDP Policies.



## Inspector's Question 7: [re. LGS designations in Goudhurst]

***What is the justification for the proposed Local Green Space designations around Goudhurst, having particular regard to the location of the village in the High Weald AONB?***

### **TWBC response to Question 7**

46. The Council refers to the introduction provided to this Hearing Statement as well as its response to Question 8 as well as **Appendix 2** and **Table 3**. All sites proposed within Goudhurst parish (with the exception of site 102) have been designated as Local Green Spaces (LGS) in Goudhurst's 'made' NDP. Therefore, in accordance with STR10 of the Submission Local Plan (SLP) [[CD 3.128](#)], the Council proposes a modification to remove these sites (as well as site 102) to ensure that the SLP is not duplicating NDP Policies.
47. It is added that, within the [Examiner's report](#), the Inspector noted that "*there has been commendable collaboration between TWBC and GPC on this matter. Indeed, as GPC comments in its response to the clarification note 'our identification of green spaces in the community and the creation of our list was a joint enterprise with TWBC. Each site was visited and discussed together. Our methodology is broadly similar although there has been some divergence in a small number of identified sites since our last meeting with TWBC was in September 2020. At that meeting TWBC noted they were reviewing the designation of churchyards as they considered they already have protection under the NPPF'*". The Borough Council has taken the same approach borough-wide, having sought to thoroughly engage on the LGS proposals with all NDP Groups, Parish/Town Councils, other community groups, Councillors, the public and landowners throughout the process, as outlined within paragraphs 4.7-4.11 of the Designation Methodology document [[CD 3.108b](#)].
48. With the exception of the sites to be removed, the Inspector concluded that "*the proposed LGSs comfortably complies with the three tests in the NPPF and therefore meets the basic conditions. In several cases they are precisely the types of green spaces which the authors of the NPPF would have had in mind in preparing national policy*" as well as that "*their proposed designation would accord with the more general elements of paragraph 99 of the NPPF*" and "are capable of enduring beyond the end of

the Plan period". This affirms the approach taken, and decision made, by the Council regarding these sites.

#### Site 102 – Five Fields (North of Church Road)

49. It is acknowledged, however, that site 102 (within the High Weald AONB) was not supported by Goudhurst's Examining Inspector. The Inspector considered that there was no evidence to justify protecting the site further beyond its existing protection given its location within the Goudhurst Conservation Area, as well as that there is little to distinguish the site from adjacent parcels of land to the north. It was also considered that the site is part of a wider area of green space rather than self-contained. The Inspector therefore concluded that the site is not demonstrably special to the local community. Given the Inspector's decision to not designate this site, the Council therefore proposes a modification to also remove this site from the SLP list of LGS sites (as per **Appendix 2** and **Table 3**).

## Inspector's Question 8: [re. LGSs in Neighbourhood Plans]

*Have any Local Green Spaces been identified in Neighbourhood Plans which have either been through examination or formally made since submission of the Local Plan?*

### TWBC response to Question 8

#### Introduction

50. Within Tunbridge Wells borough, as at May 2022, there are four 'made' Neighbourhood Development Plans (NDPs) at Hawkhurst, Lamberhurst, Benenden, and Goudhurst, while the Examiner's Report has been received for Brenchley and Matfield's NDP. Hawkhurst's NDP was made in March 2018 and modified in April 2020, and Benenden and Goudhurst's NDPs were 'made' on 23 February 2022. While Lamberhurst's NDP was 'made' prior (6 October 2021) to the Submission of the Local Plan (1 November 2021), the Council also has regard to this NDP within the response below. There are a number of other NDPs in production within the borough, most of which are at relatively early stages in the plan-making process.

#### Consideration

51. As explained within the introduction to this Hearing Statement, the Council considers it appropriate to propose a modification to remove from the Submission Local Plan (SLP) [\[CD 3.128\]](#) list of Local Green Space (LGS) sites those sites which are now adopted in 'made' NDPs and/or found suitable for designation in an Examiner's Report in accordance with Policy STR10. As such, the Council proposes to remove those sites crossed out and highlighted in red within **Appendix 2** and **Table 3** (reproduced from Appendix 2 of the SLP). This includes nine sites 'made' in Benenden's NDP, 12 sites 'made' in Goudhurst's NDP, and four sites 'made' in Lamberhurst's NDP. There are also eight sites found suitable for LGS designation by the Examining Inspector in Brenchley and Matfield's NDP. As explained in the Council's responses to previous questions, the Council also proposes to remove site 102 in Goudhurst which was not found suitable for LGS designation by the Examining Inspector.
52. It should be noted that other sites not proposed for designation in the Council's SLP (which were either not submitted to and assessed by the Council, or which were not

considered to have met the Council's designation criteria) have also now been designated within some of these NDPs.

53. In total, **33** sites currently proposed for designation as LGS in the SLP have now been either designated in 'made' NDPs for Benenden, Goudhurst, and Lamberhurst, or found suitable for LGS designation by the Examining Inspector for Brenchley and Matfield's NDP. This is in addition to the three sites at Hawkhurst which the Council have already discounted due to their existing designation in the NDP (sites 117, 118, and 126), as well as sites which were assessed by the Council but not considered to have met the Council's methodology which have now been designated in NDPs. These latter sites relate to AS\_51 and 2 in Benenden, 100 and 105 in Goudhurst, and 143 in Lamberhurst. These five sites were considered by the Council to have been already sufficiently protected under other local and/or national designations and policies in accordance with the methodology (regarding consideration given to existing protections) outlined within paragraphs 2.5-2.10, and paragraphs 9-14 of Appendix 2, of the Council's Designation Methodology document [[CD 3.108b](#)].

## Conclusion

54. In conclusion, the Council notes that 33 sites proposed for LGS designation within the SLP have now been either designated in 'made' NDPs or found suitable for LGS designation in an Examining Inspector's Report. Consequently, as per **Appendix 2** and **Table 3**, the Council considers it appropriate to remove these 33 sites (as well as site 102 at Goudhurst) from the Plan in accordance with Policy STR10 of the SLP.

# Appendices

# Appendix 1 - List of Sites Proposed to be Designated as LGS Which Were Put Forward for Consideration by the Council

Table 2 - List of Sites Proposed to be Designated as LGS Which Were Put Forward for Consideration by the Council

Site Reference	Site Name	Parish
3	Benenden Recreation Ground	Benenden
4	Glebe Field / Playing Field	Benenden
5	Iden Green Recreation Ground	Benenden
7	Bidborough Recreation Ground (North)	Bidborough
25	Five Oak Green Allotments	Capel
26	Five Oak Green Recreation Ground	Capel
45	Turner Avenue Recreation Ground	Cranbrook and Sissinghurst
94	Frittenden Recreation Ground	Frittenden
99	The Old Cricket Pitch	Goudhurst
101	Goudhurst Green Field (West of North Road)	Goudhurst
102	Five Fields (North of Church Road)	Goudhurst
103	Tattlebury Triangle	Goudhurst
106	Millenium Green	Goudhurst
107	The Cricket Pitch	Goudhurst
133	Ockley Lane Allotments	Hawkhurst
AS_39	Green Space in Bassetts Farm	Horsmonden
152	Playground, The Ridings	Paddock Wood
153	Playground, Fuggles Close	Paddock Wood
154	Green Space in Development South of Badsell Road	Paddock Wood
155	Paddock Wood Allotments South of Badsell Road	Paddock Wood
186	Pembury Allotments	Pembury
188	Pembury Cricket Ground	Pembury
189	Woodside Recreation Ground	Pembury
194	Oak Road Green Space	Royal Tunbridge Wells
211	Nevill Cricket and Athletic Ground	Royal Tunbridge Wells
212	Playground, Banner Farm	Royal Tunbridge Wells
215	Cadogan Playing Field	Royal Tunbridge Wells
216	St. John's Park	Royal Tunbridge Wells
221	Green Area, Knights Park, Just South of Golding Road and The Avenue	Royal Tunbridge Wells
222	Ramslye Allotments	Royal Tunbridge Wells
AS_80	St. John's Meadows	Royal Tunbridge Wells
AS_82	Wooded Area Behind Summervale Road	Royal Tunbridge Wells
210	Hawkenbury Recreation Ground	Royal Tunbridge Wells
217	Green Space near Sandown Park	Royal Tunbridge Wells
223	Hawkenbury Allotments	Royal Tunbridge Wells
226	Rusthall Green Space, Colbran Way	Rusthall
227	Rusthall Woodland, North of Tunbridge Wells Golf Course	Rusthall
229	Rusthall Allotments, Southwood Road	Rusthall
235	Sandhurst Recreation Ground	Sandhurst
239	Southborough Allotments at the End of Oak End Close	Southborough
251	High Brooms Allotments	Southborough
AS_83	Green Space on Powder Mill Lane	Southborough
93	Frittenden Playground	Frittenden
104	Kilndown Quarry Pond	Goudhurst
147	Paddock Wood Cemetery	Paddock Wood
148	St. Andrews Recreation Ground	Paddock Wood
150	Recreation Ground and Memorial Park, Maidstone Road	Paddock Wood
151	Putlands Leisure Centre Field	Paddock Wood
187	Pembury Green Space for Properties	Pembury
197	Great Culverden Parkland	Royal Tunbridge Wells
198	Summervale Road	Royal Tunbridge Wells
199	Playground and Green near St. Mark's Church of England Primary School	Royal Tunbridge Wells
202	Green square on Boundary Road, Hawkenbury	Royal Tunbridge Wells
203	Camden Park	Royal Tunbridge Wells

Site Reference	Site Name	Parish
204	Farmcombe Road Open Space	Royal Tunbridge Wells
205	Playing Field next to Nevill Cricket Ground	Royal Tunbridge Wells
206	Hilbert Road Allotments	Royal Tunbridge Wells
207	Park / Playground in Sherwood	Royal Tunbridge Wells
208	High Brooms Village Green	Royal Tunbridge Wells
224	Mary Caley Park	Rusthall
234	Sandhurst Green Space	Sandhurst
237	Copse of Trees, Yew Tree Road	Southborough
242	Neighbourhood Green, Lady's Gift Road	Southborough
11	Brenchley Memorial Hall Sports Ground	Brenchley and Matfield
12	Picnic Area / Viewpoint, Crook Road	Brenchley and Matfield
14	Market Heath Recreation Ground	Brenchley and Matfield
15	Jack Verrall Memorial Garden	Brenchley and Matfield
20	Woodland to North of Wish Court	Brenchley and Matfield
23	Porters Wood Playing Field, Petteridge	Brenchley and Matfield
136	Horsmonden Sports Ground	Horsmonden
137	Locket Green	Horsmonden
138	Furnace Pond	Horsmonden
142	Chequers Field (Cricket Field) and Playing Fields	Lamberhurst
236	Southfields Park, Skinners School	Southborough
238	Playing Fields and Allotments, Ridgewaye	Southborough
240	Playground at the End of Holden Corner	Southborough
241	Neighbourhood Green, Woolley Road	Southborough
243	The Rest Garden	Southborough
244	Frank Weare Recreation Ground, Salisbury Road	Southborough
245	Pennington Grounds	Southborough
246	Southborough Cemetery, North of Victoria Road	Southborough

# Appendix 2 – Proposed Amendment to Appendix 2 of Submission Local Plan [CD 3.128]: Schedule of Designated Local Green Space Sites Within Tunbridge Wells Borough

*Note: It is not proposed that the 'Reason for Removal' column is added to Appendix 2 of the Submission Local Plan.*

**Table 3 - Proposed Amendment to Appendix 2 of Submission Local Plan [CD 3.128]: Schedule of Designated Local Green Space Sites Within Tunbridge Wells Borough**

Parish	Settlement	Site Number (see the Local Green Space Assessment for reference)	Site Name	Reason for Removal
Benenden	<i>Benenden</i>	3	Benenden Recreation Ground	Designated in 'Made' NDP
		4	Glebe 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
		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>	41	Brenchley Memorial Hall Sports Ground	Found Suitable in Examiner's Report
		42	Picnic area/viewpoint, Crook Road	Found Suitable in Examiner's Report



Parish	Settlement	Site Number (see the Local Green Space Assessment for reference)	Site Name	Reason for Removal
		14	Market Heath Recreation Ground	Found Suitable in Examiner's Report
		15	Jack Verrall Memorial Garden	Found Suitable in Examiner's Report
		AS_28	Brenchley War Memorial	Found Suitable in Examiner's Report
	<i>Matfield</i>	20	Woodland to north of Wish Court	Found Suitable in Examiner's Report
		AS_27	Matfield War Memorial	Found Suitable in Examiner's Report
	<i>Petteridge</i>	23	Porters Wood Playing Field, Petteridge	Found Suitable in Examiner's Report
	Capel	<i>Five Oak Green</i>	25	Five Oak Green Allotments
26			Five Oak Green Recreation Ground	
<i>Whetsted</i>		(No sites designated)		
<i>Tudeley</i>		AS_65	Tudeley Allotments	
Cranbrook and Sissinghurst	<i>Cranbrook</i>	36	Rammell Playing Field, Bakers Cross	
		39	Cranbrook Ball Field	
		40	Big Side Playing Field, Quaker Lane	
		42	Frythe Estate Allotments	
		43a	Oatfield Drive Allotments Site A	
		43b	Oatfield Drive Allotments Site B	
		45	Turner Avenue Recreation Ground	
		52	Community Orchard, Wilsley Green	
		55	Crane Valley	
		58	Golford Cemetery	
		66	The Long Field	
		69	The Copse Nature Reserve	
75	Quaker Burial Ground			

Parish	Settlement	Site Number (see the Local Green Space Assessment for reference)	Site Name	Reason for Removal	
		NS5	Hennicker Pit and Woodland		
	<i>Sissinghurst</i>	77	Sissinghurst Primary School Nature Reserve		
		79	King George V Field		
		80	Jubilee Field Recreation Ground		
		85	Green at Hovendens		
		87	Green at Cleavers		
Frittenden	<i>Frittenden</i>	93	Frittenden Playground		
		94	Frittenden Recreation Ground		
Goudhurst	<i>Goudhurst</i>	99	The Old Cricket Pitch	Designated in 'Made' NDP	
		101	Goudhurst Green Field (west of North Road)	Designated in 'Made' NDP	
		102	Goudhurst Green Field (north of Church Road)	Not Found Suitable by Examining Inspector	
		103	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 Glebe Field	Designated in 'Made' NDP	
	<i>Kilndown</i>	104	Kilndown Quarry Pond	Designated in 'Made' NDP	
		106	Millennium Green	Designated in 'Made' NDP	
		107	The Cricket Pitch	Designated in 'Made' NDP	
	<i>Curtisden Green</i>	AS_1	The Firs Pitch	Designated in 'Made' NDP	
		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		

Parish	Settlement	Site Number (see the Local Green Space Assessment for reference)	Site Name	Reason for Removal
		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	
		133	Ockley Lane Allotments	
		AS_26	Talbot Road Allotments	
Horsmonden	<i>Horsmonden</i>	136	Horsmonden Sports Ground	
		137	Locket Green	
		138	Furnace Pond	
		AS_39	Green space in Bassets Farm	
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	

Parish	Settlement	Site Number (see the Local Green Space Assessment for reference)	Site Name	Reason for Removal
		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	
		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	
		187	Pembury Green Space for Properties	
		188	Pembury Cricket Ground	
		189	Woodside Recreation Ground	
		AS_4	Lower Green Recreation Ground	

Parish	Settlement	Site Number (see the Local Green Space Assessment for reference)	Site Name	Reason for Removal
		AS_9	Belfield Road	
		AS_13	Lower Green Burial Ground	
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	
		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	
		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	

Parish	Settlement	Site Number (see the Local Green Space Assessment for reference)	Site Name	Reason for Removal
		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 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
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

Parish	Settlement	Site Number (see the Local Green Space Assessment for reference)	Site Name	Reason for Removal
		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	