

BRENCHLEY WAR MEMORIAL HALL AND RECREATION GROUND CHARITY

Registered Charity number 216208

Brenchley Memorial Hall, Brenchley Road, Brenchley, Kent TN12 7NX.

Please respond to:
Burnside House
Church Road
Paddock Wood
Kent TN12 6HG

Mr Stephen Baughen
Head of Planning
Tunbridge Wells Borough Council
Town Hall, Mount Pleasant Road
TUNBRIDGE WELLS, KENT
TN1 1RS

14th November 2019

Dear Mr Baughen

TUNBRIDGE WELLS BOROUGH COUNCIL (TWBC) – DRAFT LOCAL PLAN CONSULTATION

Thank you for the opportunity to comment on the draft Tunbridge Wells Borough Local Plan. The Brenchley War Memorial Hall and Recreation Ground Charity would like to comment upon the proposed designation of part of its land as both a Local Green Space and an Open Space. It would also like to make some general comments about the provision of sports, leisure and recreation facilities in Brenchley and Matfield Parish, of which it is a major provider.

The Charity's comments on policies OSSR1, OSSR2, EN17 and STR/BM 1 are included on the following pages.

Yours sincerely

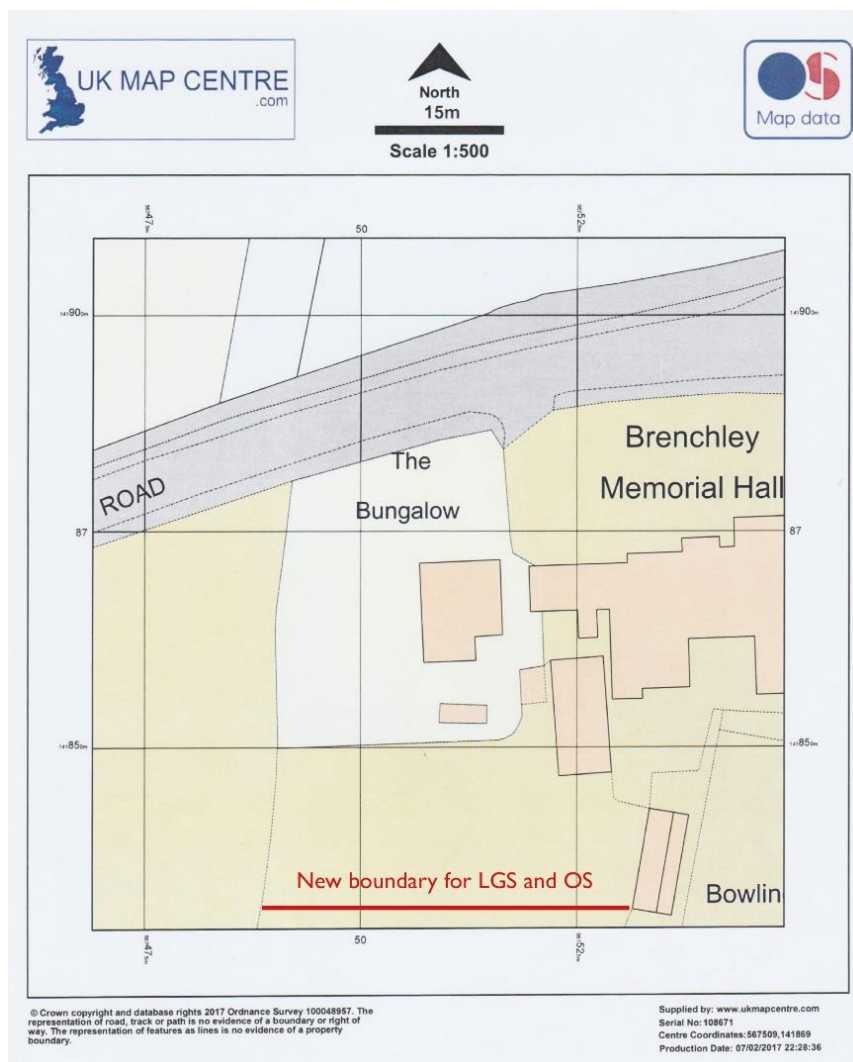
Lynne Butler
Chairman

Policy OSSR1 and Policy EN17

Brenchley War Memorial and Recreation Ground Charity welcomes policies EN17 and OSSR1 in the Draft Local Plan, which propose to protect part of its land from development by designating it as both a Local Green Space and an Open Space. The Charity provides a major contribution to the leisure and recreation facilities in the parish, with a football pitch, cricket field (also providing two junior soccer pitches and a croquet lawn), tennis courts, bowls green and squash court. The Charity's premises also include a village hall, meeting room (hosting the Parish Archive), snooker room, popular community café and day nursery. The Charity's facilities are available to a wide range of ages and interests, making an enormous contribution to the health and well-being of the community. The cricket field has been landscaped and furnished, improving the biodiversity and creating a welcoming open space that enjoys far-reaching views across the High Weald.

Throughout the borough the towns have attracted financial support from Town and Borough councils to provide a recreation and leisure infrastructure. In the rural parishes most facilities and activities appear to be privately funded, as is the case in Brenchley and Matfield Parish. As a self-funding organisation, Brenchley Memorial Hall Charity has needed to develop diverse income streams to fulfil its charitable purpose of providing recreation and leisure-time occupation for the neighbourhood.

The current sports and recreation facilities should be able to meet the needs of the community for the foreseeable future. There is an increasing demand for activities based within the buildings and the Charity wishes to retain the possibility of an extension to these facilities. There is an area of land adjacent to the squash court which cannot be used for recreational activities and is difficult to maintain. The Charity would like to reduce the area designated as Local Green Space and Open Space in the Draft Local Plan to allow the possibility of expansion. The proposed new boundary is shown in the plan below. The Charity would like TWBC to consider a reduction in the area of the Charity's land currently shown in the DLP as a Local Green Space and Open Space.



Policy OSSR2

In 2011 the population of the parish was 2863 in 1164 households, with approximately half of the population dispersed in the rural areas outside the main settlements of Brenchley and Matfield. The Fields in Trust publication 'Beyond the Six Acre Standard' (October 2016) recommends the following guidelines for formal outdoor space: 1.6 hectares of all outdoor space; 1.2 hectares of pitches; 0.3 hectares of Multi-use Game Area (MUGA) or Skateboard park.; 0.25 hectares of equipped or designated play areas.

In line with these guidelines the minimum areas in Brenchley and Matfield Parish should be: 4.58 hectares of outdoor space; 3.44 hectares of pitches; 0.86 hectares of MUGA; 0.72 hectares of play area. With around half of the outdoor space being provided by Brenchley Memorial Hall Charity and with additional space in other areas, mostly owned by Brenchley Parish Council, the parish appears to have sufficient outdoor space. However, there is only one equipped playground in the parish, at Brenchley Recreation Ground, with a small area of 0.026 hectares. The Parish is highly deficient in play areas and equipped play spaces, which was highlighted in the Core Strategy documents in 2006.

Policy OSSR2 deals with the provision of publicly accessible open space and recreation provision for new housing sites. The Open Spaces Society 'believes strongly in the value of open spaces, however small, close to where people live, for quiet relaxation and refreshment, health and well-being'.

Table 2: Recommended Application of Quantity Benchmark Guidelines – Equipped/Designated Play Space

Scale of Development	Local Area for Play (LAP)	Locally Equipped Area for Play (LEAP)	Neighbourhood Equipped Area for Play (NEAP)	Multi-Use Games Area (MUGA)
5-10 dwellings	✓			
10-200 dwellings	✓	✓		Contribution
201-500 dwellings	✓	✓	Contribution	✓
501+ dwellings	✓	✓	✓	✓

Fields in Trust guidelines recommend the following: new developments of greater than 5 dwellings should provide a Local Area for Play (LAP); developments of 10 to 200 dwellings should provide a LAP, a Locally Equipped Area of Play (LEAP) and a contribution towards a MUGA. In contrast, the Draft Local Plan makes no on-site provision for developments less than 20 dwellings and only an Amenity/Natural green space on-site for developments of 20-49 dwellings. For 50 – 99 dwellings the DLP only requires an on-site Amenity/Green space and a play space for children. Play areas for young children should be in close proximity to homes and the DLP requirements are well below the recommendations of Fields in Trust for on-site provision in new housing developments.

Policy STR/BM 1

Policy STR/BM 1 states that developer contributions should be used for the provision of allotments, amenity/green spaces, parks and recreation grounds, children's play space and youth play space. The policy highlights the need for play spaces and a new children's playground in Matfield. To create sustainable housing developments, the provision of on-site play facilities and a contribution towards a children's playground in the Matfield should be a priority. In most of the parish bus services are non-existent, cycling on busy roads populated by large numbers of HGVs is hazardous and there are no pavements to enable pedestrian access to Paddock Wood. A new sports hub in Paddock Wood will not be easily accessible to residents in Brenchley and Matfield and TWBC should ensure that developer contributions prioritise much-needed facilities within the parish.