

LEISURE & ARTS ADVISORY BOARD – 13 OCTOBER 2008

OPEN SPACE STRATEGY – CONSULTATION RESPONSE

Respondent	Site	Representation	Recommended Response
Aylesford Parish Council	Parish area.	Draft document sound and comprehensive	Noted.
	175 Podkin Meadow	Request the site is categorised as semi-natural green space. The low quality assessment in the Open Space Strategy is becoming outdated. Unsuitable for any sort of playing pitches. The Parish Council is developing Podkin Meadow as a wildlife and meadow area with an informal open play space and walking routes.	Agree to re-categorise site as Natural Green Space (includes semi-natural green spaces). Site has been re-visited and reassessed with an increased quality score being noted. The Parish Council's future aspirations for the site have been noted.
		Advised on the potential to utilise Blue Bell Hill Recreation Ground for additional sports pitches.	Option to be considered during the implementation of the Playing Pitch Strategy in liaison with Parish Council and other relevant sports clubs.
Borough Green Baptist Church	Baptist Church and grounds	The grounds, including the burial ground, are private and are not open to the public.	Noted. Amend Open Space Strategy accordingly.
Borough Green Parish Council	General	In agreement.	Noted.
	Key Policies	Endorse J2, Open Space Strategy KP1 and 2.	Noted.
	Amenity green spaces	Borough Green identified as deficient. Wishes to know Borough Council's proposals to rectify this.	The implementation of actions to address identified deficiencies is highlighted in Section 9.1 of the Open Space Strategy.

Respondent	Site	Representation	Recommended Response
Borough Green Parish Council (continued)	Lower than average sports participation in Borough.	Wishes to know proposals to rectify this in Borough Green.	Whilst this issue falls outside the scope of the Strategy it is noted that discussions are currently progressing with Wrotham School and local interest groups regarding the provision of an all-weather floodlit pitch for both school and community use. A Steering Group has been established to develop the proposal.
	4.5 Key conclusions.	Wishes to know who will fund these.	The Borough Council, in liaison with appropriate stakeholders, will investigate all viable funding options during the implementation of the Strategy. These may include developer contributions, grants and other external funding streams (eg lottery funding), capital grant from the Borough Council and funding from Parish Councils.
	Section 6.4.15	Notes low number of survey respondents re local needs in Borough Green and questions certainty of interpretation based on low sample.	Sample is small but the rigour of statistical tests conducted would indicate if there were any significant differences from overall results.
	Land including 20 and 22 Wrotham Road (7.6.8)	Confirm that amount (£76,500) will be payable to Borough Green Parish Council if provision of 0.108 hectare on site not met.	Any funding secured from this development will be allocated to areas of identified need in liaison with relevant stakeholders.
	Children's play area at junction of Tilton Road and Staleys Acre	Omitted from Strategy.	This facility was not in the ownership of the Borough Council at the time of audit. The site has been visited, assessed, included within the Strategy and cross referenced to Local Play Strategy.

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Borough Green Parish Council (continued)	221 Borough Green Baptist Chapel	Request removal of site or amendment from Annex B to Annex C as not publicly accessible.	Reclassify and move to Annex C (not publicly accessible).
	199 Field adjacent to Wrotham School	Note the low quality/low value assessment. Agree ground quality poor; question need for better access; note vandalism of dog bin posts; suggests dog walking should be encouraged.	Noted.
	Dog exclusion orders	Suggests provision should be made in the Strategy for identifying and implementing areas subject to dog exclusion orders.	This issue does not fall within the remit of the Open Space Strategy, however, the Borough Council is currently considering the introduction of additional Dog Control Orders on TMBC public open spaces and it is understood that individual Parish/Town Councils are also pursuing similar lines in accordance with powers under The Clean Neighbourhoods and Environment Act 2005.
The British Horse Society	Green Corridors and Green Chains	Support the idea. Consider multi-user green corridor along River Medway from Aylesford to Borstal. Provision of all green corridors should be available for all non-motorised users.	Amend Open Space Strategy SP6 to read wherever possible <i>and appropriate</i> , by foot, <i>horse</i> , bicycle The policy options for protecting and enhancing green corridors is being explored within the preparation of the Council's Managing Development and the Environment Development Plan Document.

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Lin Brooks (Local resident)	175 Podkin Meadow, Aylesford	Unsuitable for football pitches. Alternative at Blue Bell Hill Recreation Ground.	Noted – Consider options during the implementation of the Playing Pitch Strategy. See earlier comments from Aylesford Parish Council.
Eva Charrington (Local resident)	Tonbridge Parks	Ideas for features to make the Parks different, including a children’s garden, artistic sculptures, meditation area and ecology park.	Noted. Ideas will be considered alongside other feedback received from public.
Cobdown Sports and Social Club	Cobdown site	Classification/map of parts of site need to be checked (spreadsheet supplied by Cobdown).	Amend map boundaries to include car park and clubhouse and exclude land to the north east of Ditton Stream.
		Table 10 Indoor Sports Facilities should include two squash courts at Cobdown.	The scope of the Strategy focuses on outdoor provision (see section 1.3). Only the most significant indoor facilities have been referenced.
Ditton Parish Council	Cobdown Close	Paragraph 6.4.7 page 30 – Cobdown Close is in Ditton, not Larkfield.	Noted. Amend Open Space Strategy accordingly.
	Amenity green space	Area referenced in paragraph 6.5.4 (north of the London Road/south of the M20/east of New Road across to Cobdown Close) is thought to be in private ownership.	Noted. This part of the Open Space Strategy is not site-specific – it is identifying a broad location in the Medway Gap area that is currently deficient in amenity green space provision.
	Amenity green space	Land parallel to M20, Ditton – unclear of specific location of site.	Site location description altered to Land at Station Road, opposite junction to Robson Drive.
	Green Corridors	Support and endorse comments made by East Malling & Larkfield Parish Council.	Noted. See response to East Malling & Larkfield Parish Council on this matter.

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East Malling & Larkfield Parish Council	18 Allotments off Railway car park	Site names need to be checked against previous information supplied by the Parish Council.	Agreed. Names will be checked and amendments made if appropriate.
	Closed Churchyard at Holy Trinity, Larkfield	Should be listed in Annex B.	Churchyard already listed in Annex B.
	Abbey Meads	Wish it to be added as a possible extension of the Country Park.	Comments noted. Abbey Meads already recognised and included in Annex C.
	Leybourne Wood	Would like to see it acquired as public open space.	This aspiration is shared by the Borough Council, however previous attempts to acquire the site from the landowner have proved unsuccessful.
	Clare Lake and park land	Wish to see it open to the public and properly managed.	The formalisation of the area as public open space was previously identified within the Council's Capital Plan. The opportunity to pursue this changed following the Public Finance Initiative (PFI) development of the School, and the issuing of a long term licence to the PFI provider for the management and maintenance of the Park.
	Heath Farm	Wish to be more involved. It is within Parish but serves Kings Hill.	This is not a matter for the Strategy. East Malling & Larkfield Parish Council is consulted on all planning applications relating to Heath Farm. TMBC Development Control will draw to the attention of Liberty and Kings Hill Parish Council the wish of East Malling & Larkfield Parish Council to more actively engage in matters at Heath Farm.

Respondent	Site	Representation	Recommended Response
East Malling & Larkfield Parish Council (continued)	Green Corridors	The Borough Council should be positively engaged in promoting green corridors in the Medway Gap area (details of potential improvements were supplied).	The issue of linking open space and protecting and promoting green corridors are policy options currently being considered within the Managing Development and the Environment Development Plan Document. This plan will be published in early 2009 for public consultation. The Council will formally consider the comments provided alongside other representations made.
		Seeks "a much more firm approach" to establishing re-connection of MR114 and MR144/ Kings Hill Heath Farm. (<i>Kings Hill Parish Council support this</i>)	Comments noted although the management and development of the Public Rights of Way network is the responsibility of the County Council. Tonbridge & Malling Borough Local Plan Development Control Section has been engaged in discussion with Kent County Council on this issue but ultimately the responsibility lies with Kent County Council to enforce any residual problems.
East Peckham Parish Council	Sites omitted from Strategy.	Seeks clarification that all eligible spaces have been included. Small area of amenity land at Pound Road and play area at Hop Bine Close included in listing?	As part of the audit process all Parish/Town Councils were consulted to confirm the inclusion of all appropriate sites within the Strategy. Subsequently, Pound Road and Hop Bine Close have been visited and it is proposed that Pound Road be excluded due to its size (too small) and Hop Bine Close has been assessed and will be included within the Strategy.

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East Peckham Parish Council (continued)	Funding	Question if the Borough Council will provide any funding to rectify deficiencies, and if such funding will be given priority.	The Borough Council, in liaison with appropriate stakeholders, will investigate all viable funding options during the implementation of the Strategy. These may include developer contributions, grants and other external funding streams (eg lottery funding) capital grants from the Borough Council and funding from Parish Councils. Acknowledgement within the Open Space Strategy will assist the case for grant funding alongside other criteria.
	Criteria	Request information on the criteria and benchmarks used which identified the deficiencies.	The criteria and benchmarks used are outlined in Section 5.2 of the Strategy although the overall approach to identifying areas of deficiencies was prescribed in the Government's PPG 17 Companion Guide.
Environment Agency	River Medway and its banks	Wish to see more emphasis on the Medway Valley Walk and the role of the River Medway in providing for recreational activities such as canoeing, rowing and leisure boating; and facilities near the river for cycling, walking, seating, picnicking etc.	Access to and along the River Medway is a policy option currently being considered within the Managing Development and the Environment Development Plan Document. The Council will formally consider the comments provided alongside other representations made.

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Mrs E Godfrey (Local resident)	Allotments	Ryarsh Lane Allotments – questions accuracy of assessment of site in the Open Space Strategy.	The assessment in the Open Space Strategy was an accurate reflection of an on-site audit undertaken in 2006 and the early part of 2007. In the light of the level of responses on this matter made during the consultation, the Council has revisited and reassessed the site noting an increase in both usage and quality that has been reflected in the Strategy. Policy options for protecting existing allotments in the Borough are being developed as part of the Managing Development and the Environment Development Plan Document and will be consulted on in the early part of 2009.
Hildenborough Parish Council	206 St John's Church 556 Church Grounds	Appear to be duplicates.	Agreed. Omit site 556 as it is already included within site 206.
	139 verge in front of Foxbush 142 Fairfield Way	Question the use of these verges by the public. If included, other verges should be considered eg Greenview Crescent, Byrneside and Leybank.	Sites 139 and 142 have been revisited and excluded from the Strategy due to their primary function being highway verge.
	Hilden Park	Question separation of Hilden Park from Hildenborough Parish and implications for quantity and accessibility standards in the area.	Hilden Park is effectively part of the urban area of Tonbridge as opposed to the Rural Service Centre of Hildenborough. This is reflected in Planning Policy in the Council's adopted Core Strategy and the reason why the population of Hilden Park has been grouped with the population of the Town to calculate the open space standards for the urban area of Tonbridge.

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Hildenborough Parish Council (continued)	Footpaths	No account of footpaths.	The Strategy highlights the key long distance footpaths that cross the Borough and are identified in Table 5 of the Strategy
	Role of Borough Council	Question the relative roles of Borough and Parish in correcting deficiencies.	The implementation of actions to address identified deficiencies is highlighted in Section 9.1 of the Open Space Strategy. Relative roles for the Borough and Parishes will be determined by the nature of any emerging projects.
Kent County Council – Strategy Division	Regional/County Planning Policies	Welcome the production of the Strategy. Document fails to recognise the role of regional or county planning policies in establishing the context of the provision of open space. This context could be recognised within the document and within Annex 1 ((eg QL 11, 12 and 17 of the Kent & Medway Structure Plan (adopted July 2006)).	<p>Section 3.3 identifies that the emerging Regional Spatial Strategy provides the regional planning context. The Regional Spatial Strategy, when adopted, will replace Regional Planning Guidance for the South East (Regional Planning Guidance) 9 and ultimately the Kent and Medway Structure Plan. The preparation of the Open Space Strategy responds to one of the requirements of Policy QL17. The other policies are planning related and have been considered during the preparation of the Managing Development and the Environment Development Plan Document.</p> <p>In response to this representation, Section 3.3 will be amplified to provide a clearer regional policy context.</p>

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Peter King – The Partnership for Profit Improvement Ltd	Tonbridge	Request for signage on parks and play areas in Tonbridge.	Comments noted and will be considered within Site Management Plans for the Council's areas of Public Open Space.
Kings Hill Allotment & Garden Society	Possible allotment site	Requests advice on influence of Liberty Property Trust regarding the provision of an allotment site at Kings Hill.	This is not a matter for the Strategy. The planning permission granted by the Secretary of State enables but does not require the provision of allotments at Heath Farm to serve Kings Hill.
Kings Hill Parish Council	Policy Open Space Strategy MP1	Question how Liberty can carry out Policy Open Space Strategy MP1.	Unless there are specific planning conditions for open spaces to be sensitively managed then it is fair to say that it is not possible to implement policy Open Space Strategy MP1, with the exception of land owned or managed by the Borough Council. In light of the comments, amendments will be made to the policy. Encouraging greater biodiversity on future open space provision is a policy option being developed in the Managing Development and the Environment Development Plan Document, which will be consulted on in early 2009.
	Play Areas	Paragraph 9.1.3. The S106 Agreement with Liberty does not provide for play activities for children 9-13 years old by including Neighbourhood Equipped Play Areas and Liberty have no NEAPS on their development, although provision of a skate board park was discussed.	Comments on the existing S106 Agreement noted. However, Section 9 relates to the implementation of the Strategy ie securing adequate future provision.

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Kings Hill Parish Council (continued)	Junior Football	Open Space Strategy MP2 - want to know how the Colts Football Club is being supported by Liberty and the Borough Council.	The primary function of the Open Space Strategy is not to address such specific detailed matters. However, once adopted the Open Space Strategy may influence the development of local clubs.
	Role of the Borough Council	Open Space Strategy MP6 and Open Space Strategy MP9. Want to know the position of the Borough Council with respect to working with the Parish Council.	The Council will actively pursue the implementation of these policies on its own land. The issues identified in Open Space Strategy MP6 as they relate to the design of new open space are being addressed in policy in the Managing Development and the Environment Development Plan Document, which will be consulted on in early 2009.
		Open Space Strategy P2 How can the Borough Council manage this on Kings Hill?	This policy is being carried forward and developed as part of the Managing Development and the Environment Development Plan Document, which will be consulted on in early 2009. It will be implemented with regard to future provision.
	10 Ryarsh Lane allotments	Question whether it is accurate that the majority of plots on the Ryarsh Lane allotments are overgrown.	The assessment in the Open Space Strategy was an accurate reflection of an on-site audit undertaken in 2006 and the early part of 2007. In the light of the level of responses on this matter made during the consultation, the Council has revisited and reassessed the site noting an increase in both usage and quality that has been reflected in the Strategy.

Respondent	Site	Representation	Recommended Response
Kings Hill Parish Council (continued)	10 Ryarsh Lane allotments (continued)		Policy options for protecting existing allotments in the Borough are being developed as part of the Managing Development and the Environment Development Plan Document and will be consulted on in the early part of 2009
	Heath Farm	Reference to Heath Farm (7.6.6) provision needs to be checked.	7.6.6 reflected the position with regard to Heath Farm when the Open Space Strategy was drafted. In the light of comment, this Section will be revisited, in liaison with the Council's Development Control Service, and, where necessary, updated.
	Country Park	No plans for a country park have been made available for discussion/consultation.	Noted. The provision of a Country Park is enabled but not required by the planning permission granted by the Secretary of State. Tonbridge & Malling Borough Council Development Control Section will encourage Liberty to discuss matters with Kings Hill Parish Council.
Councillor Mrs Sasha Luck	Allotments	Ryarsh Lane Allotments – questions accuracy of assessment of site in the Open Space Strategy.	The assessment in the Open Space Strategy was an accurate reflection of an on-site audit undertaken in 2006 and the early part of 2007. In the light of the level of responses on this matter made during the consultation, the Council has revisited and reassessed the site noting an increase in both usage and quality that has been reflected in the Strategy. Policy options for protecting existing allotments in the Borough are

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Councillor Mrs Sasha Luck (continued)			being developed as part of the Managing Development and the Environment Development Plan Document and will be consulted on in the early part of 2009.
Mereworth Parish Council	Parish area	Welcomes and supports aims and objectives. Parish listing confirmed. Allotments improved, all sites cultivated, waiting list in operation. Wish for all sites to continue to be protected and maintained.	Noted.
Platt Parish Council	Typographical corrections	Typographical corrections.	Noted and amend Open Space Strategy accordingly.
	Allotments	King George's Field Allotments – privately owned, move to Annex C because the allotments are not publicly accessible.	Agreed and amend Open Space Strategy accordingly.
	Allotments	Site 14 should read Glebe Land not Glebe Lane.	Noted and amend Open Space Strategy accordingly.
	Allotments	Table 15 – amend to reflect change of status to King George's Field and Glebe Land.	Noted and amend Open Space Strategy accordingly.
	Natural Greenspace	Site 539 – inaccurate address details – correct to Platt Woods.	Noted and amend Open Space Strategy accordingly.
	Natural Greenspace	Site 560 – inaccurate address details – correct to Basted Mill Public Open Space.	Noted and amend Open Space Strategy accordingly.
	Natural Greenspace	Platt Woods – no reference in the main body of the Open Space Strategy. Should at least appear in Table 12.	Platt Woods is already included in Table 12 as a high quality/high value open space in the Borough.

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Platt Parish Council (continued)	Natural Greenspace	Rural Settlements – identified deficiency for Wrotham Heath is inaccurate.	Noted. Table 6 needs to be corrected. The proposed standard for rural settlements should be that identified for Amenity Green Space.
	Omissions	Wrotham Heath Golf and amenity space at Old Saw Mill, Long Mill Lane should be included.	Wrotham Heath Golf Course had already been recognised in the Strategy though had been incorrectly named – name now amended. Old Saw Mill open space has been visited, assessed and will be included within the Strategy.
Shipbourne Parish Council	Open Spaces in Shipbourne Parish	Acknowledge inclusion of open spaces located within the Parish within the Open Space Strategy.	Noted.
	Natural Greenspace	Roughway – clarify extent of area.	In response to this comment, a map identifying the extent of the Roughway will be sent to Shipbourne Parish Council.
	Children and Young People	In regard to Table 7, the Parish Council does not consider there is a deficiency in children's play in the Parish as Shipbourne Common provides a large area of open space which challenges children's creative play without the need for man-made equipment.	It is agreed that unequipped areas of open space play a vital role in children's play. However, the conclusions made in Table 7 specifically relate to Equipped Children's Play Areas as defined in the Companion Guide to Planning Policy Guide 17.
Snodland Town Council	Snodland Riverside	The Strategy fails to identify this open space, owned by the Parish Council, which is considered to have considerable amenity and historical value. The site however has been closed to the public for some years due to safety concerns.	The existence of the site will be recognised by inclusion in Annex C.

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Snodland Town Council (continued)	Wildlife (Bird) Sanctuary	Privately owned but wish to see the site protected.	The site has been visited and will be included in the Strategy at Annex C (non-publically accessible).
	Hollow Lane	Omitted	The site has been visited, assessed and will be included within the Strategy as Natural Greenspace.
	803 Nevill Park	Open Space Strategy should recognise the specific difficulties in the management of the site in relation to its previous history as a rubbish tip.	Noted. However, these are very specific detailed matters that go beyond the scope of the Open Space Strategy.
	803 Nevill Park	Wish to protect, enhance to Green Flag standard but cost implications may be beyond the Town Council.	The Open Space Strategy has identified the site in need of protection as high quality and high value open space. The Borough Council will support the Town Council's aspiration for Green Flag status for the Park where feasible.
	710 Recreation Ground (cross reference Councillor Anne Moloney below)	Incorrectly classified as Outdoor Sports Facility – reclassify as Amenity Green Space.	Noted. The site will be reclassified to Amenity Green Space in Table 14 and Annex A and recalculations will be made where necessary.
	3 Malling Road allotments (cross reference Councillor Anne Moloney below)	Land at Catts Alley should be excluded.	Clarify location with Town Council and amend Strategy accordingly.

Respondent	Site	Representation	Recommended Response
Snodland Town Council (continued)	3 Malling Road allotments	Remaining allotments identified as Birling Lands; move from Annex H to Annex F (Managing Development and the Environment Development Plan Document)	Site revisited, reassessed and status amended.
	527 Brookland Lake (566)	Identified in Strategy as Non-Publicly Accessible; consider moving to Publicly Accessible in view of important role in accessing River Medway public footpaths.	Site revisited and reassessed. Access around the lake reclassified as Publically Accessible Natural Greenspace.
	527 Land between Railway Line and Hillread Industrial Estate (566)	Car park area adjacent to Brooklands Lake – exclude from consideration as part of Brooklands Lake; seek alternative uses.	Site revisited, reassessed and excluded for consideration as part of Booklands Lake.
	803 Land between Nevill Road and Nevill Park	Scrubland. Overgrown. Hardly ever used. Exclude from Nevill Park.	Site revisited. Although it is acknowledged that the area may not be regularly used it appears to form part of the entire site that is Nevill Park and should remain.
	714 Holborough Sports Ground	Incorrect name – this is locally known as Holborough Park. Should be reclassified as a 'Park/Garden (Series 800) removed from outdoor sports facility classification except for cricket pitch.' Note importance and urgent need to improve accessibility. Amend tables throughout Open Space Strategy accordingly and include reference to existing plans to improve Holborough Park.	The site name will be corrected to Holborough Park. The site will be divided into two and the cricket ground will remain in the Outdoor Sports category and the surrounding land will be reclassified as Parks and Gardens. Tables will be amended accordingly. It is not the function of the table in the Executive Summary to identify improvement plans – the 'Assessment' column in this table is a summary of the audit of existing provision.

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Snodland Town Council (continued)	Holborough Quarry	Paragraph 7.6.7 should identify the importance of Holborough Park to the new Holborough development.	The focus of Section 7.6 is future provision coming forward as part of planned housing developments. The amount and detail of open space provision to meet the need generated by the new Holborough development has already been determined.
	143 Lake Area/ Paddlesworth Road	Privately owned by adjacent developers. Identify as 'Blue Lake' consider for protection and enhancement. Would like to see it recognised.	Site 143 will be renamed as it does not contain the adjoining lake area. Blue Lake will be separately recognised at Annex C as it is not publicly accessible.
	Kingfisher Lakes	Omitted from the Strategy. Wish to see the footpath/cycle way from the proposed new Medway Bridge south through Kingfisher Lakes to Snodland. Wish to protect, enhance and promote.	Kingfisher Lakes will be separately recognised at Annex C as it is not publicly accessible.
	236 Snodland Cemetery	Lack of burial spaces. Urgent need to extend.	This is not a specific matter for the Open Space Strategy. No standard is proposed in this study as it is more appropriate that provision is determined by operational requirements.
Snodland West – Councillor Anne Moloney	Holborough Park	Omitted from the Strategy (cross reference Snodland Town Council above)	See response to Snodland Town Council representation on this matter.
	Snodland Riverside	Omitted from the Strategy (cross reference Snodland Town Council above)	See response to Snodland Town Council representation on this matter.

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Snodland West – Councillor Anne Moloney (continued)	3 Malling Road allotments	Wrongly identified in Annex H of the Managing Development and the Environment Development Plan Document, these are Saltings Road allotments, known locally as Birling Lands allotments. Also inaccurately mapped for the Local Development Framework (cross reference Snodland Town Council above).	See response to Snodland Town Council representation on this matter.
	3 Malling Road allotments/ Birling Lands	Recorded in Annex H (Managing Development and the Environment Development Plan Document) should be in Annex F (cross reference Snodland Town Council above).	See response to Snodland Town Council representation on this matter.
	Holly Hill Wood	Is in <u>Snodland</u> not Burham.	The Parish boundary map has been checked and the site is evenly split between Snodland and Birling. In response to the representation, the site will be recorded as being in Snodland/Birling.
	710 Snodland Recreation Ground	In Managing Development and the Environment Development Plan Document designated as a sports facility. The Recreation Ground is public open space (cross reference Snodland Town Council above).	See response to Snodland Town Council representation on this matter.
	731 Ball Court at Potyns	Ball court is omitted.	Site visited, assessed and included in the Open Space Strategy as a Children and Young Peoples facility – Ball Court.

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Snodland West – Councillor Anne Moloney (continued)	527 Brooklands Lake	Omitted from the Open Space Strategy. Is part of Snodland Common 'public open space of some considerable significance' (cross reference Snodland Town Council above).	See response to Snodland Town Council representation on this matter.
Sport England	Overview	Welcome the preparation of the Strategy and its development in accordance with methodology set out in PPG17 Companion Guide. Open Space Strategy should help to provide a robust and defensible approach to planning for open space in the Borough.	Noted.
	Aims and Objectives	The importance of open space in the Borough is supported through a significant number of site designations, including Area of Natural Beauty, Sites of Special Scientific Interest and Sites Important for Nature Conservation. Aims and Objectives could be strengthened in regard to the need to protect sites from future development, particularly those with strong nature/recreational value.	Protection of high value sites is being addressed in the Council's Managing Development and the Environment Development Plan Document which will be published in the early part of 2009 for public consultation. The second bullet point in paragraph 1.1.12 identifies that the Open Space Strategy will provide the evidence base for the Managing Development and the Environment Development Plan Document. Also, paragraph 1.4 identifies enhancing and conserving biodiversity is a key aim of the Open Space Strategy.

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Sport England (continued)	Relevant Strategies	Additional links should be referenced between this Strategy and the Borough's Community Strategy.	It is considered Section 3.6 adequately identifies how the Open Space Strategy links with other local strategies, however, the Executive Summaries from both the Play Strategy and Playing Pitch Strategy will be added as annexes for cross referencing.
	Public Right of Way Network	Greater justification should be given on the Strategy's approach (inclusion and exclusion) to Public Rights of Way, including footpaths and bridleways.	Noted. Insert the following at paragraph 1.3.3: 'The extensiveness of the Public Rights of Way network throughout the Borough is such that it is not realistically feasible with the available resources to effectively include and assess its contribution.'
	Analysis of Provision	Further information should be provided to justify the settlement hierarchy (rural services centres, rural settlements, etc) and consideration may be given to the use of parish/townships forum areas. Collated data could be presented in the form of a delivery/action plan for greater clarity.	Noted. Insert at paragraph at the beginning of Section 6.3 explaining that the defined areas of the Borough for the purposes of the Open Space Strategy reflect those settlement confines set out in the Council's adopted Core Strategy.
	Open Space	It would be useful to map all open space typologies within the report.	Noted. The practicalities of producing an annex of maps to illustrate all open spaces across the Borough will be investigated.

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Sport England (continued)	Cemeteries/Allotments	Lack of information on the demand for cemeteries and allotments.	The Technical Study supporting the Open Space Strategy provides commentary on the issues of supply and demand for allotments and cemeteries (paragraphs 3.7.24 – 3.7.28).
	Standards	Standards should be provided for all typologies of open space in order to at least demonstrate how much provision exists per 1,000 residents.	Table 4 clearly illustrates provision (sq.m) per 1,000 population for all forms of open space typology, based upon what is currently available in the Borough.
	Usage Score	Details on how the usage score in Annex B is derived would be useful.	Noted. Insert new paragraph after 5.2.12 explaining how usage scores were derived.
	Outdoor Sports	Further details regarding demand and pitch assessment results should be provided within the report.	Details regarding demand and pitch assessment are set in the Council's Playing Pitch Strategy which was completed prior to the Open Space Strategy but forms an integral part of it, as identified in paragraph 1.1.4.
	Play Areas	Analysis of Play Areas should be based upon the type of Play Areas, ie Local Areas of Play, Local Equipped Areas of Play and Neighbourhood Equipped Play Areas as each are considered to have different catchment areas and attract diverse user groups.	Paragraph 5.2.12 and Table 2 explain the rationale for the development of accessibility standards. This methodology is consistent with that recommended in PPG17.

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Sport England (continued)	Build Facilities	Develop a separate plan for built facilities to assess demand and deficiencies in indoor provision.	The primary focus of this Strategy, in accordance with PPG17, is publicly accessible open spaces. The suggestion of developing a plan solely focussing on indoor built facilities has been noted.
	Action Plan	Although detailed site information has been collated consideration should be given to formatting this in order to allow potential developers to clearly identify areas of deficiency and therefore their potential contribution to play provision.	Detailed information on deficiencies across the Borough in the identified settlements is provided in the Technical Study. The relevant tables are cross-referenced in the Managing Development and the Environment Development Plan Document policy on open standards which will be published and consulted on in the early part of 2009.
	Developer Contributions	Contributions should be sought from developers to meet site maintenance requirements. Information and policy on this should feature in Section 8.2.4.	This is more of a matter for the Managing Development and the Environment Development Plan Document. The policy on open space provision in this Development Plan Document identifies the need for the developer to make adequate provision for the subsequent maintenance of the site. The Managing Development and the Environment Development Plan Document will be published in early 2009 for public consultation.
Councillor David Thornewell	Holy Trinity Church, Larkfield	Notes omission from Annex B (cross reference to East Malling and Larkfield Parish Council response above)	Agreed.

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	Coronation Gardens (adjacent public toilets in Aylesford Square)	Omitted from Strategy	Site has been visited and will be included as Amenity Green Space in Annex C – the site was padlocked and therefore inaccessible.
	Green Corridors	Strong support for concept and specifically for west bank riverside path from borough boundary to Aylesford Bridge (cross reference to East Malling and Larkfield Parish Council response above).	The issue of linking open space and protecting and promoting green corridors are policy options currently being considered with the Managing Development and the Environment Development Plan Document to be consulted on in early 2009. The Council will formally consider the comments provided alongside other representations made.
	New Site – Shoulder of Mutton, Wouldham	Include in Strategy.	Site has been visited, assessed and will be included within the Strategy.
Reg Spicer, Tonbridge Junior Football Club	Effectiveness of Strategy	No indication of priorities, implementation timings, or projected costs.	The Open Space Strategy was prepared in accordance with Government guidance. It will form part of the evidence base for the development of policies in the Council's statutory plans, in particular the Managing Development and the Environment Development Plan Document. The aim of the policies in the Managing Development and the Environment Development Plan Document will be to address identified deficiencies in open space provision through the processing of planning applications for future development proposals within Tonbridge.

Respondent	Site	Representation	Recommended Response
Reg Spicer, Tonbridge Junior Football Club (continued)	Synthetic Turf Pitches (STPs)	Lack of reference to the need for STPs and floodlit STPs in the borough. Includes reference to the Playing Pitch Strategy identification of STPs as a priority some three years ago.	The issue of the need for STPs is a detailed matter identified and addressed in the Council's Playing Pitch Strategy which is an integral part of the Open Space Strategy and is cross-referenced within it.
	Outdoor Sport Facilities	Comments on specific operational issues.	Noted. These are not matters that fall within the scope of the Open Space Strategy, but will be considered by Leisure Services and Tonbridge Sports Association.
Tonbridge Civic Society	Tonbridge urban area	Balance between housing density and open green space.	Noted. The issue of open space provision associated with new residential development is being addressed in policies in the Managing Development and the Environment Development Plan Document, to be consulted on in early 2009. The Open Space Strategy will form the evidence base for these policies.
		Scope – exclusion of verges and Public Rights of Way.	Roadside verges have been excluded because their primary purpose does not align with those identified in the Open Space Typology (see Table 1 of Open Space Strategy). The extensiveness of the Public Right of Way network throughout the Borough is such that it is not realistically feasible with the available resources to effectively include and assess their contribution. Four key

Respondent	Site	Representation	Recommended Response
Tonbridge Civic Society (continued)		Scope – exclusion of verges and Public Rights of Way (continued)	long distance footpaths cross the Borough and have been identified as green corridors in Annex B. It must be stressed that the management and development of the Public Rights of Way network is the responsibility of the County Council, not the Borough Council.
		10 minute access standard too long for small children.	Disagree. The local standard for distance access was achieved through market research using the residents' panel responses as recommended by PPG17.
		Children living south of the railway 'deprived' of play space.	Noted. The deficiency in open space provision at this location has been identified and acknowledged in the Open Space Strategy in paragraph 6.4.2.
		Housing development in and adjacent to Tonbridge Central Area Action Plan area must make play provision on site.	The policies in the Managing Development and the Environment Development Plan Document will be devised to ensure adequate open space provision comes forward as part of residential development proposals in and around central Tonbridge. The exact level, form and location, whether on-site or off-site, will be determined by the evidence in the Open Space Strategy.

Respondent	Site	Representation	Recommended Response
Tonbridge Civic Society (continued)		Tonbridge Central Area Action Plan area will need robust rules and defence of them to ensure attractive planting and a wildlife and people friendly outdoor environment in the redeveloped areas.	Noted. The Tonbridge Central Area Action Plan was adopted by the Council in April 2008. It contains policies seeking public realm improvements in central Tonbridge including the provision of new public open spaces. Proposals coming forward in central Tonbridge will be determined in accordance with these policies and policies in the Managing Development and the Environment Development Plan Document, once it is adopted.
		Floodlighting of school outdoor sports facilities limited to the more open sites.	The Open Space Strategy does recognise that there is a need for floodlit synthetic turf pitches. However, control over the type and hours of operation of floodlighting is a detailed matter for the planning application stage and will be determined according to existing regulations and adopted standards.
		Tables sorted geographically, by ward or parish would be more reader-friendly.	Agreed. The format of the tables within the body of the Open Space Strategy will be reordered within each category by parish (alphabetically).
		May need more maps to sub-divide the Borough further.	The maps have been included to indicate some of the outputs of the Open Space Strategy. They are not meant to be exhaustive for the whole Borough. More detailed local maps will be produced when assessing development proposals.

Respondent	Site	Representation	Recommended Response
Tonbridge Civic Society (continued)		Typographical corrections.	Noted. Amend Open Space Strategy accordingly.
		Detailed identification of sites omitted from the Tables (verges etc)	The full list of potential sites has been assessed and site visits carried out. As a result the following sites will be added into the Strategy: Upper Castle Field Play Area, Bickmore Way, Dernier Road and Hunt Road/Knight Road. Bishops Oak Ride is already include in the Strategy.
		Identifies non-publicly accessible sites associated with Tonbridge School.	The Open Space Strategy adequately identifies the open space provision at Tonbridge School. There is no need to break down the provision into further detail because Tonbridge School is not publicly accessible and therefore makes no contribution to the development of local open space standards.
Phil Shoebridge (Tonbridge and Malling Access Group)		Interesting, detailed report. Good to see that the Council is taking open/green space seriously and especially to see the importance of providing good access to open/green spaces and leisure facilities, both indoor and out.	Noted.
Councillor Allan Sullivan, Walderslade	Skate Park	Indoor skate park on Laker Road.	This form of provision does not fall within the scope of the identified typology for the Open Space Strategy. In addition, the primary focus of the Open Space Strategy is outdoor provision, as identified in Section 1.3.

Respondent	Site	Representation	Recommended Response
Trottscliffe Parish Council	Parish 644 Trottscliffe Rec 804 Trossley Country Park	Trottscliffe should read Trottscliffe. Trossley should read Trosley.	Noted. Amend Open Space Strategy accordingly.
	651 Trottscliffe Tennis Courts	Table 10 Trottscliffe tennis courts are available for public use.	Noted. Amend Open Space Strategy accordingly.
	5 Allotments, Green Lane, Trottscliffe	Table 15 Allotments, Green Lane, Trottscliffe – all the plots are let.	The assessment of the use of the site in the Open Space Strategy was an accurate reflection of an audit undertaken in 2006 and the early part of 2007. The site has been revisited and reassessed taking into consideration the Parish Council's comments. Policy options for protecting existing allotments in the Borough are being developed as part of the Managing Development and the Environment Development Plan Document and will be consulted on in the early part of 2009.
West Malling Parish Council	Parish area	Open Space Strategy does not meet legislation as it omits reference to walking within urban areas.	The Open Space Strategy was prepared in complete compliance with the Government's guidance on preparing Open Space Strategies (PPG17 Companion Guide).
	Footpaths	Request reinstatement of footpath access in some form of Public Right of Way network across Kings Hill, in particular the link between Kings Hill and Wateringbury.	This is not a matter for the Open Space Strategy. Kent County Council is the authority responsible for the Public Right of Way network in the Borough, and should be contacted accordingly on this matter.

Respondent	Site	Representation	Recommended Response
West Malling Parish Council (continued)	Towpath	Wish to see a long-distance towpath (cross reference East Malling & Larkfield Parish Council, Environment Agency; Councillor David Thornewell).	The issue of linking open space and protecting and promoting green corridors are policy options currently being considered with the Managing Development and the Environment Development Plan Document to be consulted on in early 2009. The Council will formally consider the comments provided alongside other representations made.
	Public Right of Way	Wish the informal paths across Macey's Meadow (Parish Council owned land) in Norman Road, West Malling, designated as Public Right of Way.	This is not a matter for the Open Space Strategy. Kent County Council is the authority responsible for the Public Rights of Way network in the Borough, and should be contacted accordingly.
	Allotments	Ryarsh Lane Allotments – remove from Table 15.	The assessment of the use of the site in the Open Space Strategy was an accurate reflection of an audit undertaken in 2006 and the early part of 2007. In the light of comments, the site has been revisited and reassessed noting an increase in both usage and quality that has been reflected in the Strategy. Policy options for protecting existing allotments in the Borough are being developed as part of the Managing Development and the Environment Development Plan Document and will be consulted on in the early part of 2009.

Respondent	Site	Representation	Recommended Response
Wouldham Parish Council	557 Wouldham Common	Assessed in Strategy as low quality/low value open space, with very poor access, litter, overgrown and safety vulnerable. Information and photographic evidence attached to demonstrate assessment is inaccurate. Area is in need of funding. The Group of Friends of Wouldham Common hoped that the area could be given Nature Reserve Status.	The assessment of the use of the site in the Open Space Strategy was an accurate reflection of an audit undertaken in 2006 and the early part of 2007. The site has been revisited and reassessed, however, still remains within the low quality/low value table..
	32 Wouldham Allotments	Omitted from Table 13 – require safeguarding.	The site has been visited assessed and added into the Strategy. Policy options for protecting existing allotments in the Borough are being developed as part of the Managing Development and the Environment Development Plan Document and will be consulted on in the early part of 2009.
		Request to add a Green Corridor from Borstal along the whole stretch of the river to Aylesford as part of a Green Chain between Urban Areas. ‘A Riverside Green Corridor’ (cross reference East Malling & Larkfield Parish Council; Environment Agency; Councillor David Thornewell).	The issue of linking open space and protecting and promoting green corridors are policy options currently being considered with the Managing Development and the Environment Development Plan Document to be consulted on in early 2009. The Council will formally consider the comments provided alongside other representations made.

Respondent	Site	Representation	Recommended Response
Brian Tyson (Local resident)	Shoulder of Mutton Woods	Question whether this well used piece of woodland on the North Downs Way/Wouldham Parish boundary owned by the Woodland Trust should be added to the Strategy.	Site has been visited, assessed and will be included within the Strategy..