

INDEPENDENT EXAMINATION OF THE TENTERDEN NEIGHBOURHOOD DEVELOPMENT PLAN 2013-2030

Comments on the Town Council's response to Question 5 from the examiner re: Land between Woodchurch Road and Appledore Road Tenterden.

- How is it possible to protect facilities as Local Green Space (LGS) that do not currently exist? The impartial assessment of the site needs to be based on current features and use of land, and not characteristics which might not be available for community use within the 2030 plan period. Nowhere does the LGS Site Assessment process allow for future changes of any site, yet it is being proposed for Limes Land, thereby illustrating an inconsistent assessment process and may prejudice other sites selected for LGS protection.
- The existing area will be irreversibly destroyed by the creation of an adult football pitch and 4 smaller football pitches, a pavilion, carpark and access road which will permanently destroy the beauty and tranquillity of the space. Years of housing development will also negatively impact the tranquillity of the site beyond the 2030 expiry date of the plan.
- When the sports pitches are delivered, they will be protected under COM 2 of ABC Local Plan so will not require designation as a LGS.
- The LGS Site Assessment refers to the whole of Limes Land (which was completed in the 2019/2020 prior to planning permission being granted for the western side), however, a separate Site Assessment has not been completed for the eastern half which is to be turned into countryside open space and sports pitches. The site assessment requires amendment because the prominent features described in the LGS site assessment, such as ecology (species) and historical features (marlpits, drove road, gallows green), are found on the western side of Limes Land which is subject to outline planning permission.
- The site represents an extensive track of land, which is also the case of Westwell Park, as stated by Ashford Borough Council at Reg 14.
- The Historic Landscape Assessment is not adequately referenced; the reference to the HLA is generalised and does not focus on specifics in relation to the LGS designation. Surprisingly, there is an enormous reliance on the 2019 planning application (19/01788/AS) documents rather than the current 2021 (21/00790/AS) planning application documents, many of which supersede the 2019 reports.
- The Town Council response refers to Planning Application 19/01788/AS and that permission is granted for a period of 3 years. This is incorrect. The permission is granted for 21/00790/AS.

- The Drove Road is found on the development part of the site (western) and not on the proposed LGS, thus showing another error in the assessment of Limes Land (eastern side). The accumulating errors within the Limes Land Site Assessment could ultimately be replicated in other site assessments, thereby highlighting the inadequacy of site assessment evidence.
- The Town Council response also states that 'Policy TEN NP14 seeks to retain existing sports and recreation grounds, this cannot be applied to a site which is currently in agricultural use.....'. Part of the proposed LGS is designated as playing fields, so is offered protection under the Ashford Local Plan.
- Policy TEN NP16 is referred by the Town Council under tranquillity, as a way to protect and enhance the character of PRoW AB12 within the proposed layout. It is difficult to understand how a policy, that does not exist, has any weight in the Town Councils answer. The layout was agreed at the Planning Inquiry.

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Resident of Tenterden