Minutes of a full meeting of the Tunbridge Wells Commons Conservators held in the Rackliff Centre on 21 October 2026 at 13.30

Present:

Cllr Martin Brice
Paul Burnett (on Zoom)
Ewen Cameron (on Zoom)
Cllr Simon Davidson
Mark Dennison (arrived at 13.45)
Cllr Corinna Keefe (on Zoom)
Stephen Lacey
Ian Marshall (Chair)
Martin O'Meara
Cllr Jayne Sharratt
Clare Sinha (arrived at 13.55)
Corin Thoday (on Zoom)

Attending:

David Miller (Treasurer)
Gemma Stapeley (Clerk)
Roger Barton (Friends of the Commons)
Cllr Paul Gripper (Rusthall Parish Council)

Observing:

John Barber
Neil Spalding

1. Membership updates

Martin O'Meara was welcomed as a new Conservator, representing the Lord of the Manor of Rusthall.

2. Declaration of business interest and conflicts of interest

There were no declarations of business interests or conflicts of interest. A conflict of interest arises when a Conservator's personal or business interests, or those of a person or organisation connected to them, conflict with the interests of the organisation.

3. Apologies for absence

No apologies were received.

4. Minutes of the last meeting

The minutes of the meeting held on 13 June were considered and approved. A copy was to be signed by the Chair and returned to the Clerk.

5. Minutes of the Committee meetings

The minutes of the Committee meetings held on 31 July, 11 September and 9 October were considered and approved. A copy of each set of minutes was to be signed by the Chair and returned to the Clerk.

6. Matters arising

6.1 Footpath lighting – Rusthall Common

Following an evening path safety and lighting walk with Cllr Jayne Sharratt and a local resident, it became apparent that the vast majority of the proposed cycle path is unlit and could be dangerous to use outside daylight hours.

The Clerk raised this with the Tunbridge Wells Borough Council (TWBC) and Kent County Council (KCC) project team, who confirmed that a full lighting survey would now be undertaken and that a proposal to install appropriate lighting along the route would form part of the project.

It was also confirmed that the path would be designed in accordance with the recommendations in Active Travel England's recently published Rural Design Guide.

6.2 Canada geese – Brighton Lake

The Ranger confirmed that the remaining population of Canada geese had migrated from Brighton Lake and that their return next year would be monitored to better understand what injuries or deaths had occurred.

The Community Safety team at TWBC continue to work alongside Kent Police to monitor the situation and take appropriate action where necessary. This is made more challenging by the fact that simply possessing or using a catapult is not necessarily illegal, the circumstances, intention and whether wildlife is harmed are relevant.

6.3 Sink hole

The action for Targetfollow to obtain independent legal advice was first raised at the April full meeting.

Ewen Cameron confirmed that, while Targetfollow is the riparian owner, they do not accept liability for the costs of repair to the sink hole. It is his view that the 1981 County of Kent Act states:

Section 108

(1) The conservators shall have a duty to maintain and preserve the commons.

(2) The conservators may for the purpose of this Part—

(a) execute works of drainage and improvement of the commons;

As background and not discussed in the meeting, it is the Clerk's view that although the Act states that the Conservators can undertake works involving water and drainage, they have powers but not liability. The Act does not state that the Conservators must fund all repairs, particularly structural repairs relating to ownership. The Conservators have not assumed riparian ownership duties, nor was the damage caused by their work, or by any negligent action on their part. Equally the Conservators have not adopted the area.

The Clerk made initial enquiries with Thompson, Snell and Passmore (TS&P) who noted on an initial reading of the situation that liability was "unlikely to fall on the Conservators". To continue to work with TS&P and get their formal legal opinion would be £1,800 including VAT.

The Clerk had also contacted Cripps, who suggested instructing a specialist barrister to obtain Counsel's opinion on who is liable for the cost of the works. This option would be more costly, at between £3,300 and £6,000 inc. VAT for the barrister plus Cripps' fees for instructing Counsel.

Action: Conservators asked the Clerk to investigate the matter further.

6.4 Implications of drought

When asked about the impact of the summer drought on the Commons, the Ranger reported that some of the trees were showing signs of stress. He was monitoring their condition closely as part of the autumn/winter tree surveys, with particular attention to the presence of fungi. He also confirmed that five of the thirty-three saplings planted last winter had died.

6.5 101 Steps project

Work had commenced on the long-awaited restoration project.

6.6 Biodiversity Net Gain (BNG)

At the 31 July Committee meeting, Paul Burnett confirmed that he would get the reference to BNG potential removed from the sales details for the Commons, due to it being inaccurate and misleading. As of 21 October, the reference remained in the documents.

Action: Corin Thoday confirmed that he would get the reference removed.

6.7 Pantiles car show

Martin O'Meara reported that the show went well.

Action: Martin to confirm the total donation raised through the event for Taylor-Made Dreams.

7. Risk Management

Since the last meeting in June 2026 the following has been reported:

7.1 Accidents

There have been no accidents.

7.2 Incidents

There were nine incidents on the Commons, five of which involved motorbikes and bicycles.

7.3 Campers

Four camps were reported.

7.4 Fly-tipped waste

Two incidents reported: a shopping trolley and pile of black sacks.

7.5 Complaints

No complaints received.

7.6 Risk register review

The Clerk explained that the full risk register had been reviewed and updated as part of the annual review and had been discussed at length and agreed by the Committee. The significant changes between 2025 and 2026 were discussed as follows:

- The impact of permanent encroachment has been increased. The Lord of the Manor had proposed the potential development of 104 luxury flats on Tunbridge Wells Common. While this proposal may be misleading, given the legal protections in place, the proposal on paper was significant and the risk should reflect this.
- The likelihood of anti-social behaviour had been increased to reflect more frequent occurrences, specifically the more regular verbal abuse and threats of physical violence towards the Ranger. The Ranger reported receiving significant support in this area from the local PC, Lisa Whitehead.

- The impact and likelihood of wildfire has been increased given the prolonged periods of drought and heatwave in 2026, with forecasts indicating that these conditions could become more severe in 2027.
- While the risks to payroll services and funding have not been adjusted, both need to be closely monitored as the process of moving to a unitary authority continues.
- The risks of unwanted media coverage and a reduction in public interest and use of the Commons had been significantly reduced. The sale of the Commons had led to very positive news relating to its management, and the community had stood united to demonstrate the strength of its feelings towards the land.

The Conservators agreed with the annual review. The risk profile was considered acceptable, and the response appropriate. They did not consider that any key risks were missing, nor that any further action could be taken to identify or respond to risks.

Conservators were encouraged to contact the Clerk whenever they wished to discuss risk, rather than waiting until the annual review.

7.7 Insurance

The Zurich insurance policy was renewed on 1 January 2026.

8. Clerk's report

8.1 Volunteers

Volunteer sessions	Total number of hours contributed (since last meeting)	Total number of hours year to date 1 April 2026 to 31 March 2027	Financial value (as per National Lottery Heritage Fund rate of £10/hour)
Ranger volunteers	98	194	£1,940
Monthly Saturday mornings	56	116	£1,116

8.2 S106 requests and status

Date Requested	Property	No. of dwellings / increase in dwellings	Amount requested	Latest update
18/03/2022	WA Turners (22/00238)	94	£18,800	18/12/2024 - Application Approved and S106 request approved.
11/07/2022	Showfields Estate (22/01576)	36	£3,377.75	£2,048.54 requested and received, the balance of £1,329.21 yet to be released.
05/09/2022	Cinema Site (22/02304)	166	£33,200 + £2,684.64 indexation = £35,884.64	Money requested from TWBC.

15/05/2024	Phillips and Eynsham House 24/01150	44	£8,000 + indexation.	Following a planning appeal, works have commenced. Trigger is prior to first occupation.
26/11/2025	Hendy Garage/The Culverdens 25/02604/FULL	104	£21,840	Application approved. S106 request pending consideration.
03/02/2026	Spratsbrook Farm, Eridge Road 26/00094/FULL	125	£26,250 (incl 5% admin)	A S106 request pending consideration.S106 request pending consideration.

S106 balance for each reserve

- Union House (The Potteries) reserve balance: £7,851.27
- Eridge Road retirement flats balance: £27,991
- Russell Hotel reserve: £1,800

8.3 Biodiversity Net Gain (BNG)

The Clerk had been invited by Paul Burnett and Corin Thoday to attend a meeting on BNG with representatives from BNP Paribas and Strutt & Parker's Natural Capital team to establish whether BNG was viable for the Commons.

Discussions confirmed the Clerk's research and decision that BNG was not viable on the Commons, as the land was already subject to a management regime in accordance with the comprehensive ecological management plans.

Strutt & Parker confirmed that it was "not worth spending time or effort on this".

Note: This item also relates to the matter under Section 6.

8.4 Funding

A grant of £655 had been received from TWBC's Community Climate Action Grant for tools and equipment for the Woodland Adventurers' forest school sessions.

The Clerk was currently investigating whether a second Farming in Protected Landscapes (FiPL) grant could be applied for to fund a proportion of the cost of a remote control mower. She continues to work on a proposal.

8.5 Public Enjoyment Plan (PEP)

The Clerk has created a document to monitor and record actions against the PEP objectives and recommendations from the public engagement questionnaire. The document was available from the Clerk on request.

8.6 Kent County Council – flood and water management

The Conservators approved the additional scrapes planned to accommodate any drainage basin overflow. The works would be funded by KCC.

8.7 Proposed cycle path

The Clerk provided an update from the TWBC and KCC project team from 2 October:

- TWBC's public engagement exercise ended on 27 September, and the designers entered a "design freeze" with no changes being made while the engagement responses are collected and analysed.
- Overall, the responses have been very positive in terms of improved crossing facilities, improving access to green spaces and improvements for walking, wheeling and cycling. Most of the feedback for the technical and design teams had related to the western end of the route (Langton Green). There has been little specific feedback relating to the Commons, although one respondent made a general point that they would be unlikely to cross or use the Commons at night due to dark conditions.
- Church Road/A26 (London Road) junction and the Lower Cricket Ground area – the designers have advised that the junction would be subject to traffic modelling to understand what was possible in terms of pedestrian crossings and signal timings before any further design decisions are made in this area.
- The project team have requested information on potential surfacing materials; making it clear that further discussion on this matter would be required to address the Conservators' concerns and obligations.

8.8 Events

Since the last full meeting, the following events, funded by the Friends have taken place on the Commons:

- 9 July - Butterfly guided walk with Michael Blencowe.
- 21 July – moth survey and breakfast with Michael Blencowe.
- 15 August – nature walk with Michael Blencowe.
- 10 September – bat walk with Michael Blencowe.
- 1 October – fungi walk and talk with Martin Allison.
- 13 October – fungi walk and talk with Martin Allison.

8.9 Woodland Adventurers

The free forest school sessions have proved to be incredibly popular. Forest School leader, Miss Lewis, from the Wells Free School, and other volunteers have worked together with the Clerk to deliver fun and enjoyable sessions. The sessions take place on the first Saturday of the month from 10am-11.30am on Common View meadow in Rusthall, details as follows:

Date	Activities	No. Of children attending
4 July 2026	Butterfly life cycle, butterfly craft and apple bird feeders.	Not recorded
1 August 2026	Spider and spider web crafts, bug hunting and identification.	Not recorded
5 September 2026	Stick rafts, litter picking, bug hunting, button jelly fish.	24
3 October 2026	Fungi spotting nature walk, litter picking, colouring Halloween themed wooden shapes and making autumnal wind chimes.	23

8.10 Contracts

The Conservators agreed that the litterbin servicing contract could be extended retrospectively for a further 12 months, from 1 April 2026 to 31 March 2027.

Both the litterbin servicing contract and the grass-cutting contract would go out to tender in 2027. The Conservators agreed that the Committee would have delegated authority to manage the initial stages of planning for the new contracts, with updates and approvals referred to all Conservators.

8.11 Pension

Tunbridge Wells Commons Conservators joined the Local Government Pension Scheme on 1 October 2026. Plans are in place with TWBC Payroll to enable officers to join as soon as the relevant paperwork had been completed.

8.12 Fire plan

Taken from the 9 October Committee meeting minutes:

During one of the Clerk's Common Therapy meetings, the topic of Fire Plans and wildfire management was discussed. One of the land managers in attendance was also a firefighter. He explained that Northumberland Fire and Rescue Service (F&RS) had been made responsible for wildfire planning and management across the country.

Northumberland F&RS had created a template Fire Plan, which would be used by all Fire Services, for green spaces within their respective areas. In our case, the Fire plan will belong to Kent F&RS, it would be completed by them, with support from the Conservators as land managers, and it would sit within their records and under their responsibility.

The Clerk had prepared a draft Fire Plan for the Commons, however, in light of the new scheme, the report would be put on hold.

The Clerk had contacted the Emergency Planning Team at TWBC to raise concerns about wildfires on the Commons and their potential impact on the town. Their officer, Mike Catling, suggested that the Clerk and Ranger begin working on the template Fire Plan so that, when contacted by KFRS, they would be prepared and would have already collated the relevant information.

Action: Officers to collate information for the template Fire Plan.

8.13 Other

- Tunbridge Wells Common was awarded a gold in the South and South-East In Bloom competition and was best in category for Commons/green spaces.
- The Clerk and Ranger discussed a visit to Banstead Commons, where they had observed best practice in scrub and heath management, adder surveying, working with volunteers and office and welfare facilities for staff. They had also been introduced to the remote control mower, which was currently being investigated for FiPL funding.

8.14 Requests to Conservators

Since the last meeting, there had been no requests to Conservators.

9. Ecological management plan work schedule for Q3 2026/27

Work continues to progress well following the recommendations in the two Ecological Management Plans. Conservators approved the work schedule planned for Q3 of 2026/27.

10. Ranger's report and financial work plan

10.1 Tree work

Felling licence

Officers have submitted a felling licence application to the Forestry Commission to cover potential and planned projects over the next 18 months. Having the licence in place provides flexibility to progress works in a timely manner without having to wait for a new licence.

The Ranger has been notified that the licence has been agreed in principle, although further discussions regarding re-stocking will take place.

Tree safety surveys

The Ranger completed his summer tree safety survey in accordance with the management plan. The recommendations from the tree survey are being planned into the Q3 and Q4 schedule. The autumn tree survey is now underway.

Ash trees

Several large ash trees on Langton Road and Rusthall Road will need to be removed this winter.

Elms and further tree planting

Disease resistant elm trees planted over the last 18 months are doing well, although the severe drought and intense temperatures have led to the loss of five saplings.

Given the predicted severity of next year's drought, the Ranger proposes planting a much smaller number of larger, more established elm trees this winter. These will be planted in locations that are easily accessible for watering.

10.2 Projects and works for approval

The Ranger discussed the following projects, to be scheduled as and when the budget and S106 funding allows. The Conservators agreed.

1. London Road A (Eridge Rd Roundabout) - clear secondary sycamore along path to the south of Pantiles car park.
2. Upper Pantiles car park box glade (Racecourse 3) - clear felling holly and sycamore regrowth on two corners.
3. Brighton Lake - removal of curly water weed using Truxor weed boat, disposal of weed and electrofishing and rehoming fish.
4. Racecourse 4 - thin the holly and sycamore on both sides of the racecourse path north of Bracken Cottage easement.
5. Bishops Down - selective poor quality tree felling.
6. Elm tree path - remove all dead elms, mulch path and remove large ash group.
7. Racecourse corridor connection - remove all holly from large space joining to Victoria Grove.

10. 3 Grass management

Short/amenity grass contract

All in order, in accordance with the work schedule and budget.

Long grass and meadows

All in order, in accordance with the work schedule and budget. There is provision in the budget Q3 budget to tackle areas adjacent to Mount Ephraim, maintaining and extending the clearance work started in 2025 and early 2026.

10.4 Invasive species

Q2 focussed on the final eradication of Japanese knotweed. A small amount of cherry laurel was targeted but bird nesting made this difficult. Q3 will see increased prioritisation of laurel and rhododendron treatment.

10.5 Handyman

The handyman is a huge asset, fast-tracking infrastructure work such as the installation of removable security bollards, byelaw signs, bins and benches. He has also significantly sped up the programme of bench restoration; hence we have gone slightly overbudget while the weather was favourable during the dry months.

10.6 Bollards

The Ranger has commenced repairing and straightening the bollards at the end of Common View with the help of the handyman.

Consideration is still being given to the installation of barriers at each entrance to The Bumps. This area is a favourite for motorbikes and barriers should help to reduce this unwanted ingress. The issue is whether the motorbikes will then simply ride on other paths which might put pedestrians at greater risk.

The Ranger has been monitoring the issues of vehicle ingress along the lower island of the Inner London Road. Ingress is proving to be rare, the occasional scaffold lorry or workman's car. The Ranger has concluded that replacing the existing short posts with chestnut short posts is the most efficient and effective solution. This will be carried out this winter with the significant help of the handyman.

10.7 Footpath management

The contractor has made several patch repairs to the tarmac paths during Q2, further repairs are planned for Q3.

10.8 New van

The Ranger confirmed that the new Renault Trafic van was proving to be a great asset, enhancing his ability to work efficiently on the Commons.

10.9 Pond management plan

Following discussions during the mid-year review with the Committee, the Ranger had raised the need for a pond management plan covering all ponds across both Commons. This would help provide clear prescriptions for how, where and when work should take place.

The Ranger was keen to use ecologist Kate Ryland, to ensure consistency with the existing management plan, but alternative quotes would be requested for comparison.

Action: The Ranger to obtain quotes for a pond management plan.

10.10 Financial work plan

Conservators approved the Ranger's financial work plan for Q3 2026/7.

11. Finance

11.1 Finance report

Net income less expenditure for the six months to 30 September, before taking into account fixed asset expenditure, was £19,656. This was £15,557 higher than the budget figure of £4,099 and £14,739 lower than the figure for the same period last year.

The bulk of the positive budget variance arises under the heading of Maintenance of Commons, where current expenditure is expected to account for much of the underspend during the third quarter of the financial year. It will be noted that the budgeted expenditure for the first six months under this heading was approximately £26,000 higher than the actual expenditure for the same period last year. This reflects opportunities identified by the Ranger and Clerk during the budget-setting process to use the Precept to fund projects for the general improvement of the Commons.

With current levels of budgeted general expenditure, and the full recognition of fixed asset acquisition costs as a deduction from the General Reserve, including the replacement van, the Adequacy of Funds figures no longer show the high levels of 'headroom' seen in recent quarters. At 30 September, the General Reserve was above the minimum required level of 30% of the Annual Precept, but not by a large margin. Spending plans for the remainder of the year will be reviewed to ensure that the 30% threshold continues to be met.

As an update on the VAT reclaim, Kate Jackson of Surrey Hills Solicitors continues to work on submitting a Section 33 request to HMRC. The submission will set out several reasons why TWCC should be eligible to be included in the Section 33 regime, including similarities with Wimbledon and Putney Commons Conservators (WPCC), which were added to the regime by Treasury Order in 2009. Section 33 of the VAT Act 1994 essentially provides that VAT should not become a burden on local taxation where public bodies discharge functions assigned to them by Parliament for the public benefit. It is anticipated that the application will be submitted shortly.

Interest rates offered by our banks remain unimpressive. At the beginning of October, Unity Trust was paying 1.95% per annum, while the Lloyds 32-day notice account paid 1.85%. Instant access deposit accounts with Lloyds paid considerably less. Unfortunately, when we last carried out a detailed review, most of the more attractive rates available were restricted to individuals or limited companies. However, further checks will be carried out and a report provided in due course. The FSCS (Financial Services Compensation Scheme) protection limit is currently £120,000 per bank.

The fixed asset register was reviewed and accepted.

11.2 Accounts

The accounts for Q1 2026/27, sent via email on 15 July 2026, were approved. The accounts for Q2 2026/27 were approved.

11.3 Bank reconciliations

A reconciliation as of 30 September 2026, supported by copies of relevant bank statements, were provided for approval and signing.

11.4 Review and acceptance of 2025/26 external audit

Conservators reviewed the external audit report, noting the other matter raised as follows:

"While the smaller authority has confirmed that it did consider the independence of the internal auditor upon appointment, this was not minuted and so we have not been able to verify this to documentary evidence. This was requested as part of our intermediate review procedures. In accordance with the Practitioner's Guide Paragraph 4.11 it is considered best practice to review the independence of the internal auditor on an annual basis".

The external audit report was accepted.

11.5 Annual review of personal, financial and professional independence and competence of internal auditor

In response to the other matter raised in the external audit report, the Clerk had prepared a full report on the independence and competence of the internal auditor, attached as Appendix A1.

Having read and discussed the report, it was agreed that Tunbridge Wells Commons Conservators have considered the requirements of the Practitioners' Guide, issued by the Smaller Authorities Proper Practices Panel (SAPPP) concerning the competence and independence of the appointed internal auditor and are satisfied that the auditor has appropriate knowledge, experience and expertise to undertake the internal audit of a smaller authority and is sufficiently independent of the Conservators' financial decision-making and operational arrangements.

As part of this annual review, it was resolved to continue to work with Mulberry Local Authority Services Ltd as TWCC's internal auditor for the 2026/27 and 2027/28 financial years.

11.6 Annual review of effectiveness of internal audit

The Clerk had prepared a full report on the effectiveness of internal audit, attached as Appendix A2.

Having considered the evidence, Conservators agreed that they were satisfied that the internal audit arrangements for 2025/26 were effective, provided sufficient assurance to the authority, and met the requirements of paragraph 4.16 of the Practitioners' Guide.

11.7 Precept 2027/28 approval

The Treasurer confirmed that RPI for September 2026 was 3.9% and proposed that Conservators requested the maximum precept from TWBC for 2027/28 of £240,497. Conservators approved the proposal.

Action: The Clerk to prepare a request to Tunbridge Wells Borough Council for the maximum precept of £240,497 for 2027/28.

12. Friends of the Commons

12.1 Membership

There are now 820 memberships, an increase of 370 since 1 January.

12.2 Sale of Commons

The Friends have confirmed to Targetfollow and their agents, BNP Paribas, that they remain committed to acquiring the Commons on behalf of the community.

On 2 September the Friends held their AGM and provided an update to members. This was followed up on 12 September by writing to all members and pledgers providing an update on the situation. The Friends have received strong messages of support from members and pledgers.

Roger Barton explained that BNP Paribas had given the Friends a deadline of close of business on the 22 October to submit a final bid for the Commons

12.3 Website

The Friends will be launching a new website, with an improved appearance, performance and functionality. The Clerk had been asked to review a draft version and reported that it was an excellent new site, which would prove to be a great asset to the Friends and community.

12.4 Future plans

The Friends are considering using QR codes to provide a guided walk around the Racecourse on Tunbridge Wells Common. They have consulted with the Clerk and Ranger and together will work on a project plan.

13. Marketing and PR report

The report highlighted that there had been articles published in the Town Crier, Rusthall Life and blogs on the website.

The Facebook group now has 3,148 members with monthly reactions from members between 366 and 2,598. The most popular posts, during the quarter, related to:

1. South and South-East In Bloom gold award winners.
2. Work to the 101 Steps.
3. Organised bat walk with Michael Blencowe.
4. Ranger Dan back from holidays, it feels like Autumn.
5. European fire bugs (insects).

The Instagram account has 926 followers, while the website remains a popular source of information.

14. Dates for meetings in 2027

Confirmed as 13.30-15.30 on the following dates at the Rackliff Centre:

- 20 January
- 28 April
- 16 June
- 20 October

15. Policy review

Conservators approved the amended versions of the following policies:

- Advertising
- Complaints
- Health & Safety
- Information technology (IT)
- Standing orders

The Accessibility statement for the website had been completely rewritten and was also approved.

Action: The Clerk to add the ammended versions of the policies to the website.

16. Any other business

16.1 Support of other organisations.

It was agreed that the Conservators would support other organisations on a case-by-case basis, where there is a clear purpose and benefit in doing so.

16.2 Request to hold the next Hospice in the Weald run on Sunday 19th September 2027 (all arrangements the same as previous years)

The request was approved, subject to clear instructions being given to ensure that all rubbish and signage be removed immediately after the event.

Action: the Clerk to discuss the details of the approval with the event organiser.

16.3 Walk and draw, creative events

The Conservators approved a series of walk-and-draw creative events on the Commons, led by Arty Farty, a local community arts organisation based in Southborough. Six new events to be included in the 2027 calendar of events.

17. Planning applications

26/02144/FULL The Forum.

Response on behalf of the Commons Conservators:

The Tunbridge Wells Commons Conservators have been fully consulted by the Forum management team throughout the design phase of their application. We are satisfied that the proposals have been developed with appropriate consideration and are pleased to confirm our full support for the planning application.

END

Date of next meeting: 20 January 2027

Agreed actions

Agenda item	Agreed action	Responsibility	Progress/update
4 & 5	Chair to sign the minutes of the previous meetings and send to the Clerk.	Clerk and Chair	Complete
6.3	Further investigations into the liabilities of the riparian owner to manage and finance repairs to the sink hole.	Clerk	
6.6	Removal of all reference to BNG in the Targetfollow marketing material.	Corin Thoday	
6.7	Confirm the total donation raised through the event for Taylor-Made Dreams.	Martin O'Meara	
8.12	Collate information for the template Fire Plan.	Clerk and Ranger	
10.9	Collate quotes for a pond management plan.	Ranger	
11.7	Prepare a request to Tunbridge Wells Borough Council for the maximum precept of £240,497 for 2027/28.	Clerk	Complete
15	Add the amended versions of the policies to the website.	Clerk	Complete
16.2	Discuss the details of the approval with the organiser of the Hospice in the Weald run.	Clerk	Complete

Appendix A1: supporting information

A1. Annual review of personal, financial and professional independence and competence of internal auditor

Annual review of the independence and competence of the appointed internal audit provider, Mulberry Local Authority Services Ltd (MLAS), in accordance with paragraphs 4.6, 4.9, 4.11 and 4.12 of the Practitioners' Guide.

The review considers the three aspects of independence identified in paragraph 4.11: personal independence, financial independence and professional independence and 4.12: competence.

Taken from The Practitioners' Guide, issued by the Smaller Authorities Proper Practices Panel (SAPPP):

4.6 In addition to ensuring the appointed internal auditor has relevant knowledge of the public sector, there are two key principles an authority must follow in appointing an internal audit provider: independence and competence.

4.9 Independence requires the absence of any actual or perceived conflict of interest. It means that whoever carries out the internal audit role does not have any involvement in, or responsibility for, the financial decision making, management or control of the authority, or for the authority's financial controls and procedures.

4.11 There is no requirement to rotate auditors, but the independence of the appointed person or firm should be reviewed every year with regard to; personal independence, financial independence, and professional independence.

Competence

4.12. Evidence as to competence might include letters of recommendation from other similar authorities.

Personal independence

The Clerk and Treasurer had no previous employment, business or professional relationship with MLAS before MLAS was appointed to provide services to the Conservators.

The Conservators are not aware of any personal relationship between MLAS, its directors or audit team and the Conservators, Officers or other persons involved in the financial management of the authority that could give rise to an actual or perceived conflict of interest.

The Conservators have therefore concluded that there is no actual or perceived personal conflict of interest affecting the independence of the internal auditor.

Financial independence

MLAS does not have any financial interest in the Conservators and does not participate in the Conservators' financial decision-making, financial management or financial control arrangements.

Mark Mulberry of MLAS has provided initial advice to the Conservators concerning VAT arrangements. Mark Mulberry has not been directly involved in the Conservators' internal audit work.

Other than this initial VAT advice, MLAS does not provide other services to the Conservators and does not have another role within the organisation or with the Conservators.

The Conservators have considered whether the provision of this VAT advice creates an actual or perceived conflict of interest. They are satisfied that the advice was limited in nature, that Mark

Mulberry has not been involved in the internal audit, and that the circumstances do not compromise the independence or objectivity of the internal audit function.

The Conservators have therefore concluded that MLAS is financially independent for the purposes of its internal audit role.

Professional independence

Andy Beams conducts the internal audits for the Conservators on behalf of MLAS. He has no involvement in, or responsibility for, the Conservators' financial decision-making, financial management or financial control.

On 25 August 2026, Andy Beams, Director of MLAS, confirmed in writing that

“Mulberry Local Authority Services Ltd and its directors and audit team are independent of Tunbridge Wells Commons Conservators.”

The Conservators have considered this confirmation as part of their annual review.

The Conservators have therefore concluded that the internal auditor is professionally independent of the authority and is able to undertake the internal audit objectively.

Competence:

MLAS was recommended to the Conservators by Claire Reed, the then Clerk and Responsible Financial Officer (RFO) to Rusthall Parish Council, based on her knowledge of their services and experience of their work.

In 2024, having worked with the Mid Kent Audit Partnership for many years, the Conservators agreed that the Clerk and Treasurer could engage with alternative internal audit providers. Comparable introductory meetings were held with MLAS and April Skies. The Conservators considered the experience, knowledge and approach demonstrated by both providers and were satisfied that both had the necessary competence to undertake the internal audit role. Following this process, the Conservators agreed to appoint MLAS.

MLAS specialise in town and parish councils, they describe their core services on their website as including comprehensive statutory internal auditing for town and parish councils.

MLAS’ internal audits cover the required internal-control objectives. They explicitly work to the Practitioners' Guide, which is the relevant framework for smaller authorities. Their 2025/26 service specification says their audits are delivered in compliance with the SAPPP Practitioners' Guide.

MLAS have substantial sector experience; Andy Beams has relevant local-council experience and qualifications.

A copy of the engagement letter is held by the Clerk and available on request.

A2 Annual review of effectiveness of internal audit 2025/26

Taken from The Practitioners’ Guide, issued by the Smaller Authorities Proper Practices Panel (SAPPP):

4.16 Authorities should, at least annually, carry out a review of the effectiveness of their overall internal audit arrangements. It should be designed to provide sufficient assurance for the authority that standards are being met and that the work of internal audit is effective. Authorities should judge the extent and scope of the review by reference to their own individual circumstances.

Information to consider:

Independence and competence

The Conservators have considered the independence and competence of the appointed internal auditor and are satisfied that the auditor has appropriate knowledge, experience and expertise to undertake the internal audit of a smaller authority and is sufficiently independent of the Conservators' financial decision-making and operational arrangements.

Purpose and scope

The internal audit arrangements are specifically designed to meet the requirements applicable to the Conservators as a smaller authority and take account of the authority's individual circumstances and responsibilities.

Coverage of the audit

The internal audit covers the areas required by the Practitioners' Guide and provides appropriate coverage of the authority's financial controls, governance arrangements, risk management and the preparation of the Annual Governance and Accountability Return.

Information management

Officers provide information requested by the internal auditor in advance of the audit. This allows sufficient time for the auditor to examine evidence and undertake meaningful testing.

Annual Governance Statement

The internal audit provides assurance over the adequacy and effectiveness of the authority's financial controls and governance arrangements and provides relevant assurance to inform the preparation of the Annual Governance Statement and Accounting Statements.

Reporting

Internal audit reports are detailed and thorough. Findings are reported to all Conservators, and they have the opportunity to consider findings, recommendations, and any required actions.

Previous recommendations and findings

There is an appropriate mechanism for ensuring that recommendations and agreed actions are followed up and implemented. The Conservators made a positive response to the 2024/25 internal audit recommendations and follow up actions, which were acted upon by Officers and implemented. The 2025/26 internal audit included consideration of the implementation of actions arising from the previous audit. There were no further recommendations made during the 2025/26 internal audit, but Officers will continue to identify and work on improvements to best practice.

Timeline

The internal auditor conducts two internal audits, one midway through the financial year and one at year end. This timetable provides an opportunity for Officers to respond promptly to recommendations and ensures that the audit work is undertaken in sufficient time to inform the Conservators' governance review and Annual Governance and Accountability Return process.

Changes in requirements

Changes to the Practitioners' Guide are considered as part of the audit process, helping the Conservators maintain awareness of developments in governance, risk management, and internal control. The work required in relation to Assertion 10 is a useful example.

Challenge

The audits provide appropriate challenges to Officers and the Conservators. They do not simply confirm the existence of documented procedures but consider whether controls are operating effectively and encourage the authority to consider improvements.

Reports by the external auditor

The 2025/26 external audit confirmed that no other matters had come to their attention giving cause for concern that relevant legislation and regulatory requirements have not been met. This provides additional assurance about the authority's overall arrangements.