

Examination of the Tunbridge Wells
Borough Local Plan

**Tunbridge Wells Borough Council
Hearing Statement**

**Matter 10: Employment,
Economic Development and
Infrastructure (Policies STR5,
ED1, ED2, ED3, ED4, ED5,
ED6, ED7, ED8 and ED12)
Issue 7: Tourist Accommodation
and Attractions**

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Matter 10 – Employment, Economic Development and Infrastructure (Policies STR5, ED1, ED2, ED3, ED4, ED5, ED6, ED7, ED8, and ED12)

Issue 7 – Tourist Accommodation and Attractions

Inspector’s Question 1: [re. interpretation of wording ‘attractive to the market’]

Is it clear to decision-makers, developers and local communities what is meant by the phrase ‘attractive to the market’ in Policy ED7?

TWBC response to Question 1

Introduction

1. Policy ED 7 – ‘*Retention of, and improvements to existing, and the provision of new, tourist accommodation and attractions*’, sets out the Council’s policy approach to the provision of tourist accommodation and attractions, across the borough.
2. The supporting text to the policy sets the framework for the policy approach and highlights the importance of tourism to the economy of the borough, in line with the approach set out within the NPPF at Section 6 – Building a strong, competitive economy.

Consideration

3. The policy as worded outlines the criteria by which development proposals will be considered and in the introductory part of the policy states “*The retention of existing tourist accommodation (both serviced and non-serviced) will be supported where it is well located and attractive to the market...*”
4. The supporting text to Policy ED 7 at paragraph 6.501 refers to the importance of protecting and retaining “*existing, well located, and suitable tourist accommodation across*

the borough to maintain an adequate supply of a range of accommodation throughout the plan period”.

5. The intention of the policy is to protect existing tourist accommodation where it is appropriate to do so. The wording currently refers to where it is ‘well located and attractive to the market’, which in the Council’s view would take account of such issues as (but not exhaustively),
 - Well located - its location in terms of sustainability and accessibility by a range of transport options - the local road network or close to public transport.
 - Well located - whether it is in proximity to tourist attractions or within easy access to attractions.
 - Suitable - if the property is of a good standard and meets modern requirements or is capable of meeting modern requirements, taking into account the type of property and the location – i.e. if it is of heritage value or within a sensitive area.
 - Suitable - if the accommodation is accessible to all (including those with specific accessibility requirements such as wheelchair users) or is capable of being made accessible to all users.
6. It is considered that it could be helpful for users of the Local Plan, to define what is meant by ‘*attractive to the market*’, within the supporting text at paragraph 6.501 to refer to the above issues. Suggested wording could include; “*It is equally important to protect and retain existing, well located, and suitable tourist accommodation across the borough to maintain an adequate supply of a range of accommodation throughout the plan period. For the purposes of Policy ED 7 – accommodation which is considered to be ‘attractive to the market’ would include accommodation which is well located to the local road network or accessible by public transport, within a sustainable location or in proximity to tourist attractions. It would also be appropriate to protect accommodation which is of a suitable standard and meets modern requirements where possible or can be made so, subject to the individual property type and location”.*
7. It is the Council’s view that such an amendment would therefore provide greater clarity on the purpose and application of Policy ED 7.

Inspector's Question 2: [re. 18 months marketing period]

What is the justification for requiring 18 months' worth of marketing where the change of use of existing tourist accommodation is proposed? Does this apply to all applications for a change of use of land and buildings?

TWBC response to Question 2

Introduction

8. Criteria 2, of Policy ED 7, sets out the requirement for 'Sufficient marketing that the property has been marketed for sale for at least 18 months at a market price, which reflects the existing use as tourist accommodation, and the condition of the building'.
9. A similar question is posed by the Inspector in relation to Policy ED 2 – Retention of Existing Employment Sites and Buildings and the Council's response can be found within Hearing Statement TWLP/055. This considers the evidence provided for within the Economic Needs Study (ENS) 2016 [\[CD 3.25\]](#), where there is considered to be strong justification for the retention and protection of the borough's supply of existing employment land and premises as well as further justification for this approach and indeed the 18 month marketing period as set out in the Retail, Commercial Leisure and Town Centre uses study 2021 [\[CD 3.86a\]](#) at paragraph 8.24(vi).
10. In terms of tourist accommodation, evidence is provided for within the 'Hotel Capacity Study', [\[CD 3.29\]](#) which recognises the importance of tourism to the economy of the borough and considers the current hotel stock and any gaps in provision. The recommendations of the study refer to the amount of accommodation stock and whilst in general terms, the study considers that there is a healthy provision of hotel accommodation, there are gaps in provision and scope for the upgrading and expansion of visitor accommodation across the borough.
11. Taking the above into account, the Council has considered that it is appropriate therefore to seek to maintain the existing tourist accommodation stock where appropriate as per the Council's response to the Inspector's Question 1.
12. The response to the similar Question on ED 2 as referred to above, provides commentary on the rationale behind the 18 months marketing period proposed within the policy,

including the advice provided within the evidence base informing the Local Plan and the 18-month period allowing sufficient time for other policy requirements to be fulfilled, such as efforts to promote, improve and market the property. In terms of tourism, it is also important to consider any 'seasonal impact' of both letting and marketing of the property and reference to the marketing information which should be provided is set out within the policy. In addition, the policy specifically refers to "*The Council may require the review of submitted information by an independent consultant: it is expected that the applicant will cover the cost of this*". This will ensure that such considerations are properly considered by an independent consultant.

13. The above approach is therefore considered to be justified, appropriate and proportionate.

Consideration - Is the 18 months of marketing necessary for all applications for changes of use?

14. The application of criterion 2 of Policy ED 7 is considered to be justified, proportionate and appropriate for the reasons set out under Question 2 above, i.e. the policy will be consistently applied to all applications for change of use resulting in the loss of existing tourist accommodation and the criteria of the policy will be considered against the proposal. Likewise, it is considered appropriate and necessary that the criteria within it, including the 18-month marketing period, would also need to be consistently applied, and each case assessed on its merits.

Inspector's Question 3: [re. sustainable rural tourism]

Does Policy ED7 enable sustainable rural tourism and leisure developments as required by paragraph 84 of the Framework?

TWBC response to Question 3

Introduction

15. Paragraph 84 of the NPPF seeks to support a 'prosperous rural economy' and requires planning policies to enable;

- The sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
- The development and diversification of agricultural and other land-based rural businesses;
- Sustainable rural tourism and leisure developments which respect the character of the countryside; and
- The retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

16. Policy ED 7 specifically seeks to protect and retain existing tourist facilities as well as promote and support new and improve existing tourism uses, tourist accommodation and attractions and seeks to positively provide for sustainable tourism across the borough.

17. A number of further policies within the Local Plan seek to enable the above which are set out in more detail below.

Consideration

18. As referred to at paragraph 7 above, the key policy in this regard is Policy ED 7 which is broken down into two sections covering – 1) the retention of existing tourist accommodation and 2) new, or improvements to, tourist accommodation and visitor attractions. A number of criteria are set out by which proposals will be assessed against

and the final sentence of the policy refers to “*The proposal will be assessed against all other relevant policies in the Local Plan*”.

19. The second section of Policy ED 7 provides guidance via four further criteria ensuring that development is sustainable through criteria a-d which considers issues such as; anticipated traffic generation and consideration of sustainable transport modes, if the proposals have an acceptable impact on local and landscape character, the consideration of relationships to existing tourist development and facilities and the impact on residential amenity in the locality.

20. When the Local Plan is taken as a whole, a range of policies, in particular the Development Management policies seek to provide the policy approach towards economic development and tourism across the borough over the plan period in accordance with the above.

21. Taking each of the criteria set out within Paragraph 84 as above – the Local Plan policies provide as follows;

- a) – The sustainable growth and expansion of all types of rural business in rural areas, through conversion of existing buildings and well designed new buildings is provided for through Policies ED 2 – Retention of Existing Employment Sites and Buildings, Policy ED 4 – Rural Diversification, Policy ED 5 – Conversion of Rural Buildings Outside the Limits to Built Development, Policy ED 6 – Commercial and Private Recreational (including equestrian) Uses in the Countryside, Policy ED 7 – Retention of, and improvements to existing, and the promotion of new, tourist accommodation and attractions.
- b) – The development and diversification of agricultural and other land-based rural businesses is provided for through Policy ED 4 – Rural Diversification and Policy ED 5 – Conversion of Rural Buildings Outside the Limits to Built Development.
- c) – Sustainable rural tourism and leisure developments which respect the character of the countryside is dealt with through Policy ED 4 – Rural Diversification, Policy ED 5 – Conversion of Rural Buildings Outside the Limits to Built Development and Policy ED 6 – Commercial and Private Recreational (including equestrian) Uses in the Countryside. Additionally the suite of environmental policies - In particular Policy EN

1 – Sustainable Design, Policy EN 4 – Historic Environment, EN 5 – Heritage Assets, EN 8 – Outdoor Lighting and Dark Skies, Policy ED 10 – Protection of Designated Sites and Habitats, Policy EN 12 – Trees, Woodland, Hedges and Development, Policy EN 13 – Ancient Woodland and Veteran Trees, Policy EN 16 – Landscape within the Built Environment, Policy EN 18 – Rural Landscape, Policy EN 19 – The High Weald Area of Outstanding Natural Beauty, Policy EN 20 – Agricultural Land , which provide the policy approach towards development and impact on the natural environment.

- d) – The retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship – policies providing for these include Policy ED 2 – Retention of Existing Employment Sites and Buildings, Policy ED 8 – Town, Rural Service and Neighbourhood Centres, and Village Settlements, Policy ED 12 – Retention of Local Services and Facilities and Policy OSSR 1 – Retention of Open Space and Policy OSSR 2 – The provision of Publicly Accessible Open Space and Recreation.

22. When considered together, it is the Councils view that Policy ED 7, in combination with the above policies adequately reflects the intention of paragraph 86 and it is considered that the above approach enables rural tourism and leisure developments across the borough in accordance with the NPPF.

AL/SO2 – Land at Mabledon House, Southborough

Inspector's Question 1: [re. cross boundary cooperation with Tonbridge and Malling]

What is the justification for Policy AL/SO2? What cross-boundary cooperation and agreement has been reached with Tonbridge and Malling Borough Council regarding the proposals?

TWBC response to Question 1

Introduction

23. Policy AL/SO 2 allocates land at Mabledon House for the development of a luxury hotel up to a maximum of 200 rooms and leisure development with spa and conference facilities, set within a restored historic park and garden and wider attractive landscape.
24. It is acknowledged and highlighted within the policy and the supporting text at paragraph 5.145 that the site straddles the borough boundary with Tonbridge and Malling Borough and that whilst the house lies within the boundary of Tunbridge Wells Borough, the proposed policy encompasses a vision for the whole site falling within both administrative boundaries.
25. The site was considered through the Strategic Housing Land Availability Assessment (SHELAA) [\[CD 3.77n\]](#) as suitable for allocation within the Local Plan (pages 155 – 159) and considered through the Sustainability Appraisal (SA) [\[PS 013\]](#).
26. Specifically, the SHELAA conclusion states “*This part greenfield/part PDL site is considered to be suitable as a potential Local Plan allocation as confirmed by the SA subject to further consideration for specific uses, namely hotel and leisure Page 18 of 38 Tunbridge Wells Borough Council Site Assessment Sheets for Southborough Date of publication – January 2021 uses. Due to the sensitive nature of the site, it is not proposed to be released from the Green Belt and any development coming forward for the site would need to demonstrate very special circumstances*”.

The justification for the Policy

27. The site has been put forward by agents on behalf of the owner as a proposed hotel and conference centre and a ‘Vision Document’ was submitted as part of the site submission

for the Council to consider and provides the background to the site, the planning context and need, the proposal and benefits and effects.

28. In reviewing the submission and the evidence which has been produced to inform the Local Plan, the Council would highlight the Hotel Capacity Study 2017 [CD 3.29], which considers the tourism role and potential within the borough and the importance of tourism to the borough's economy.

29. The Hotel Capacity Study also considered and assessed the current level and standard of existing tourist accommodation across the borough and carried out a 'Gap Analysis' which considered any gaps in provision of tourist accommodation and how this might be met across the borough over the plan period. Specifically, within the recommendations, at paragraphs 7.2 and 7.3, the study refers to the following;

"...Additionally, it is considered that there is a lack of luxury five star hotels within the town offering accommodation at the higher end of the market..."

Based on a steady increase in domestic tourism across the UK and within the region, there is scope to upgrade and expand existing visitor accommodation across the borough to facilitate more rooms and provide new and/or improved amenities such as spa facilities and packages. Given the heritage of Royal Tunbridge Wells Town Centre as a spa town, which attracts a large number of pampering breaks/weekend holidays, the existing and proposed hotel establishment could offer improved and extended spa facilities and packages to tap in to this potential market".

30. Additionally, updated work – the 'Kent Accommodation Study' carried out by Canterbury Christ Church University in 2020, considered and identified gaps in Kent's hotel provision and opportunities for future growth.(<https://www.visitkentbusiness.co.uk/insights-and-resources/kent-accommodation-study/>). This study includes 'District Dashboards' and within the Tunbridge Wells Borough section it refers to the borough having the highest rental demand in the county, reflecting a relatively high travel demand in the area. It considers that the borough benefits from a wide visitor offer, with a particular focus around the natural and built environment, with a 'heritage and nature offer' as well as 'attractive settings for a wider visitor experience'.

31. The study also refers to the emerging Local Plan, the evidence base and the policy support that it provides – including reference in particular to a ‘priority gap’ of a ‘5* offer – to draw on spa heritage and health and wellbeing agenda’.
32. The above has been taken into account in the consideration of the site and the drafting of Policy AL/SO 2.

Background to the site

33. Specifically, Mabledon House and Gardens (Grade II house and Grade II Historic Park and Garden) is of some importance locally being associated with the architect Decimus Burton who played an important and influential role in the development of Royal Tunbridge Wells in the 19th Century. There have been discussions with the owners of the site and their agents over a number of years in terms of securing the future of this important site. There is a lapsed planning consent for conversion of the Manor house (which sits wholly within Tunbridge Wells Borough) by planning reference [15/500589/Full](#) into 9 self-contained apartments but this does not cover a number of redundant modern buildings (which sit wholly within Tonbridge and Malling Borough) and nor does it cover all of the extensive gardens, parkland and kitchen gardens which spread across both boroughs. As above, this permission has not been implemented and has now lapsed.
34. The house and gardens are in need of repair/renovation and the redundant modern buildings offer scope for redevelopment. The policy is seen as the most effective way of bringing forward a comprehensive scheme for the entire estate and noting the cross-boundary nature of the site has the benefit of providing early engagement with Tonbridge and Malling Borough Council, to ensure a joined- up approach. It has also provided for early engagement with the relevant statutory consultees - Natural England and Historic England.
35. The Council is therefore of the view that the policy as worded is comprehensive, justified and is appropriate to address the cross-boundary issues and the particular circumstances of the site.

Cross boundary cooperation with Tunbridge and Malling Borough Council

36. All previous planning applications for this site have been discussed with Tunbridge and Malling Borough Council (TMBC) and so the cross- boundary nature of the site has been well known for some time.
37. The site was included within both the regulation 18 and Regulation 19 version of the Local Plan. At regulation 18 TMBC commented on the policy [CD3.132 b(iv) page 16]: *“TMBC welcomes the opportunity to discuss the proposed site allocation at Mabledon House with Tunbridge Wells Borough Council within the context of the emerging Local Plan, subject to a better understanding of the scale and form of the development, particularly in respect of that part of the site within Tunbridge and Malling, the very special circumstances for the development within the Metropolitan Green Belt and the impacts on High Weald AONB and its setting”*.
38. No specific comments were made at Regulation 19 but the policy is covered by the Statement of Common Ground with TMBC [[3.132c\(ii\)](#) page 73] which states that:
- “Mabledon House*
- 5.14 This proposal (200 bedroom hotel) is of a considerably smaller scale than the strategic sites and Kingstanding Way. Both authorities commit to working together on detailed proposals for this site, including through any pre-application discussions and with KCC and Highways England in relation to vehicular access arrangements”*.
39. This clearly demonstrates a positive approach to this allocation and a willingness of both Tunbridge Wells Borough Council and Tunbridge and Malling Borough Council to work together to bring the site forward to secure its future over the plan period.

Inspector's Question 2: [re. scale of development]

What is the scale of development based on and how has this been established?

TWBC response to Question 2

Introduction

40. Policy AL/SO 2 has been prepared taking into account the site submission from the agents on behalf of the owners of the site and the Council's consideration of the site, the Council's evidence base and taking account of the sensitivities in this location (in particular, Green Belt, landscape, heritage and transport) as well as further discussions with the site promoters.

Consideration

41. The site submission refers to the site's potential to provide for a 5-star graded luxury hotel, providing for the highest levels of service, significant levels of accommodation, a wide range of conferencing facilities and a spa, pool and gym. More specifically it suggests that it could provide;

- 200 en-suite double bedrooms and suites accommodated within the main house and new build
- Sub divisible Ballroom/Restaurant/Conference Hall, capable of seating up to 200 delegates
- Up to six lounges and meeting rooms
- A conservatory restaurant
- Independent reception; and
- A Spa with pool, treatment facilities and gymnasium

42. The above has informed the policy as it is drafted as well as the evidence base in relation to the above. The policy therefore sets out a number of detailed criteria to inform and assist decision makers when considering proposals for the site. These relate to the following;

- access arrangements
- the need for a heritage assessment and landscape and visual impact assessment
- a conservation plan, landscape and ecological management plan
- provision for public access to the heritage assets and historic park and garden
- improvements to the Public Right of Way network and the cycle network.

43. Additionally, the policy makes it clear at paragraph 3, which areas of the site are considered to be suitable for development and the areas which are appropriate for retention and enhancement. Reference is also made in the policy to the Site Layout Plan – Map 24. It is considered that the Site Layout Plan could benefit from being amended to more clearly illustrate the existing areas of the site including the house and parkland. An amended Plan is included at Appendix 1 of this statement.

44. A number of amendments were made to Policy SO 2, in response to comments received at the Regulation 18 Draft Local Plan which has addressed some of the concerns raised and provided greater clarity on the approach to the site.

Inspector's Question 3: [re. Green Belt boundary]

Does the Plan seek to alter the Green Belt boundary in this location to facilitate the development proposals?

TWBC response to Question 3

Introduction

45. There is no proposal to alter the Green Belt Boundary in this location. The site contains a number of redundant modern buildings that have a considerable footprint and volume. Redevelopment of these buildings is likely to be considered an exception to NPPF Green Belt policy – i.e. are not inappropriate development - under paragraph 149 (d) “the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces” and/or consistent with paragraph 150 (d) “*the re-use of buildings provided that the buildings are of permanent and substantial construction*”.
46. Whilst a great deal of the development envisaged by the policy can be provided for through alterations to the existing main house and ancillary buildings and the redevelopment of the modern redundant buildings noted above it is recognised that alteration and/or an extension to the main house is also likely to be required. This is considered not inappropriate development under NPPF paragraph 149 (c) “*the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building*”. Mindful of the listing of both house and gardens the policy provides guidance under criteria 3 as to how to approach new development:

“Any new development should be informed by a heritage assessment and a landscape and visual impact assessment. Development should:

- a. be concentrated within those areas that already contain built form and not in the areas shown to be retained as parkland landscape on the site layout plan;*
- b. be subservient to the main house and respectful of its setting in terms of design, including height, scale, and massing;*
- c. retain and enhance key features and vistas of the parkland”*

47. However even taking into account what might be not inappropriate development under the national Green Belt policy identified above and policy STR9 Green Belt, it is likely that not all of the development necessary to achieve the scale or quality of development needed for it to be successful will be not inappropriate in terms of Green Belt policy and so a case will have to be made for Very Special Circumstances for at least part of the development and so this approach is justified. Compliance with the policy in terms of criteria 4, 5 and 6 are likely to make a significant contribution to very special circumstances that are particular to this site and will need to be addressed at planning application stage:

- *criteria 4- The provision of a detailed and fully funded conservation plan and scheme of restoration for the built heritage assets and the historic park and garden to be secured as part of any development;*
- *criteria 5- The provision of a landscape and ecological management plan for ongoing protection and management of the identified landscape and ecological features of the site to be secured as part of any development;*
- *criteria 6- Provision to be made for public access to heritage assets and the historic park and garden under an agreed scheme of site management, to include connections to, and improvements of, existing Public Rights of Way;*

48. Consequently, it is not considered necessary to alter the Green Belt boundary as the development envisaged by the policy will either be compliant with the existing Green Belt policy or has the strong potential to be justified by Very Special Circumstances and this can be demonstrated at the planning application stage.

Inspector's Question 4: [re. demonstration of very special circumstances]

What is the justification for requiring applicants to demonstrate very special circumstances that clearly outweigh the harm by reason of inappropriateness, and any other harm? Can this be demonstrated at planning application stage?

TWBC response to Question 4

49. Please see the Council's response to Question 3 above which addresses this question.

Inspector's Question 5: [re. public access to the site]

Is it clear to decision-makers, the site owners and local communities which areas are to be made open to the public? What is the justification for this and how will it be managed?

TWBC response to Question 5

Introduction

50. Public access is covered under criterion 6 of Policy AL/SO 2, which also requires a scheme of site management and states the following: "*Provision to be made for public access to heritage assets and the historic park and garden under an agreed scheme of site management*".

Consideration

51. As explained above the house and the Historic Park and Garden are of some importance to the development of Royal Tunbridge Wells and so will be of some interest to residents and visitors. Whilst it is intended that the site will be open to paying members of the public visiting the hotel and its' facilities, it is felt that it is also important to make provision for local residents or others visiting the area (but not actually staying at the hotel or using the facilities) to be able to visit the site (without having to pay for access via the hotel and facilities) and provision should be put in place for this, which will need to be discussed and agreed as part of the detailed proposals.

52. Access to heritage assets is commonly agreed through a condition on planning applications that may require a requirement to be part of, for example, 'Heritage Open Days' or the 'National Garden Scheme'. The agents promoting the site have indicated that this would be acceptable and that a condition for such a purpose would be appropriate.

53. As detailed above, provision is to be made for public access to heritage assets and the historic park and garden under an agreed scheme of site management, including public access to the wider grounds and parkland. On reviewing the policy and the supporting text it is considered that it may be helpful to provide some further commentary within the supporting text to refer to the above and provide clarity on the approach in relation to

public access to the site. Additional wording can be provided to the Inspector if this is considered helpful.

Inspector's Question 6: [re. deliverability of allocation]

Is the allocation deliverable?

TWBC response to Question 6

Introduction

54. It is considered that this site is deliverable within the Local Plan period. It is being actively promoted by the agent through the Local Plan process.

55. Additionally, in the agent's submission to the Council it is clear that it is the view of the current owners that it is no longer tenable to keep the house solely in residential use, as has been the case since the early 1900's, due to the ongoing need for repair, restoration and modernisation.

56. It has also been confirmed that the previous permitted planning consent for the subdivision of the house into 9 self-contained apartments and to demolish/convert the other buildings is not considered to be viable and therefore alternative proposals were considered necessary to secure the future of the building as an important heritage asset. It is considered by the owner's agent and their specialist advisors that the proposed use as a hotel as provided for within Policy AL/SO 2 is an appropriate, viable and deliverable use for this site.

AL/CRS5 – Sissinghurst Castle Garden

Inspector's Question 7: [re. location of Sissinghurst Castle Garden]

Is the location of Sissinghurst Castle Garden accurately identified in the Plan?

TWBC response to Question 7

Introduction

57. Sissinghurst Castle Garden comprises a range of facilities, including gatehouse buildings that form the remaining part of an Elizabethan manor complex, an extensive area of gardens to the rear of these buildings, a complex of farm buildings and barns (some of which now provide ancillary tourist facilities), allotments that serve the restaurant, and surrounding areas of undeveloped land that provide opportunities for walking and linking into the wider Public Right of Way network that cross through and adjacent to the site.
58. Sissinghurst Castle Garden is a nationally important tourist attraction, as well as being a popular leisure facility for the local community. It is surrounded by, and connected to, the wooded farmland and orchards, and to surrounding settlements, by a good network of footpaths. It also provides a source of local employment.
59. This site allocation policy recognises the importance of Sissinghurst Castle Garden to the local economy and also to the historic character of the wider Sissinghurst area

Consideration

60. The role that Sissinghurst Castle Garden has locally (as well as nationally) was recognised when officers met with the Cranbrook & Sissinghurst Parish Council during the early stages of the plan preparation. This site allocation policy recognises this importance of Sissinghurst Castle Garden to the local economy and also to the historic character of the wider rural area around Sissinghurst village.
61. It is the case, as explained above, that the tourist attraction known as 'Sissinghurst Castle Garden' is not just the castle buildings, or just the garden. The importance of the attraction should be viewed as a whole, and therefore geographically covers a relatively extensive area, and does not only include built development. However, it would be

inappropriate to draw a red line around the site; by only including the main features (the castle buildings, the garden, the immediately adjacent farm buildings now used for tourist use) would lose the wider features of the site (the estate walks, allotments) that create the setting of Sissinghurst Castle Garden within the wider rural landscape. The star symbol shown on Map 40 Site Layout Plan within the Local Plan has been used to indicate the broad location of the site; it is positioned between the castle buildings and gardens to the rear, the converted barns, and the 'village green'/open space within the centre of the site.

62. The Regulation 19 representation from the National Trust (the owners of the site) PSLP 1100, states that the "The National Trust supports the inclusion of a specific policy for Sissinghurst Castle Garden within the Local Plan as this will help preserve the setting and views into and from this important tourist destination. We also support criterion 4 which requires an assessment of archaeological potential for any proposal that fall within the setting or approach to Sissinghurst Castle Garden". The representation therefore recognising that the importance of Sissinghurst Castle Garden is not restricted to the main features but includes its wider rural setting.
63. The Council is therefore of the view that the star symbol shown on Map 40 Site Layout Plan provides an accurate location marker for the Sissinghurst Castle Garden within the wider rural landscape to inform the use of Policy AL/CRS5 for decision making.

Appendix 1 – Amended Map 24 - Site Layout Plan

Map 24 Site Layout Plan

