



The countryside charity

Kent

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

Issue 7 – Tourist Accommodation and Attractions

Policy AL/SO2 – Land at Mabledon House, Southborough

CPRE Kent welcomes, in principle, a use that will both restore and preserve this important building and allow access to it by at least those members of the public who can afford to use its facilities.

Q1. 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?

No indication is given as to whether Tonbridge and Malling Borough Council supports this allocation and have formally committed to development on land within that borough. As this allocation was proposed in the Regulation 18 Draft Local Plan in 2019, it is surprising that support from the neighbouring borough appears to be still in doubt. Indeed, we note that the area of historic parkland within TMBC that was shown on Inset Map 3 in the Pre-Submission Plan (CD_3.59cii), has been removed from the Submission Plan Inset Map 3 (CD_3.129cvi).

Q2. What is the scale of development based on and how has this been established?

CPRE does not object to the concept of Mabledon House being converted to a hotel, however we are concerned as to the scale of the proposals at a site which is outside the LBD and within both the AONB and the Green Belt.

We suggest that a lower maximum to the number of hotel rooms permitted would limit the need to make material additions to the existing building and contain the need for additional buildings and parking areas on the site.

CPRE is additionally concerned that the entirety of this site (12.62 hectares) is being allocated for development. We cannot see any real protection against further built development within the large area marked as open green space and landscape buffer on Policy Map 24 (that is shown as part of the Historic Park and Gardens on Inset Map 3). Policy point 3a only requires it to be concentrated within those areas that already contain built form.

Q3. Does the Plan seek to alter the Green Belt boundary in this location to facilitate the development proposals?

Q4. 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?

The Plan does not propose to remove any part of this site from the Green Belt, however we believe that the development of “a luxury hotel up to a maximum of 200 rooms and leisure development

The Kent branch of the Campaign to protect Rural England exists to protect the beauty, tranquillity and diversity of the Kent countryside

CPRE Kent Queen’s Head House, Ashford Road, Charing, Kent TN27 0AD
www.cprekent.org.uk Phone 01233 714540 Email info@cprekent.org.uk

Registered charity (number 1092012), limited company registered in England (number 4335730)

with spa and conference facilities” is likely to harm the Green Belt, the AONB and the historic nature of the site.

CPRE Kent is opposed to building in the AONB or the Green Belt unless exceptional circumstances have been made.

Mabledon House is a Grade II Listed Building and of important historic interest to the Tunbridge Wells area, as it is the childhood home of Decimus Burton who designed many buildings in and around Tunbridge Wells (most famously the Calverley Estate) in addition to buildings at Regents Park and Kew Gardens. Mabledon was built in 1804 by his father John Burton. Having been his childhood home, Decimus Burton went on to make substantial alterations to Mabledon House and drastically changed the appearance of the building. Decimus Burton is locally acclaimed as the man who effectively transformed Tunbridge Wells architecturally into the town that it is today. With this in mind great care must be taken in developing this site.

The proposal for up to 200 hotel rooms, and a leisure development with spa and conference facilities, will undoubtedly transform the setting of this historic building. For example, 200 rooms are likely to require an additional wing to be added to the building or a whole new block altogether. Extensive car parking areas will be required for both visitors and staff. Despite the protections set out in the policy, CPRE is highly sceptical this can be achieved without damaging the character of the existing building, thereby breaching policy STR2. We note that existing modern buildings, that the policy overview highlights as currently detracting from the setting of the main house and parkland area, are within Tonbridge and Malling Borough.

Q5. 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?

No, it is not clear to local communities.

Q6. Is the allocation deliverable?

No, this allocation is not deliverable in its current form.

1. As noted in our response to Q1, the required support from Tonbridge and Malling Borough does not appear to have been agreed.
2. Policy AI/SO2 references contributions to mitigate the impact of development “in accordance with Policy STR/SO1”, however that policy only references developer contributions “from residential schemes” and appears to cover only the built up area of Southborough.
3. The IDP does not set out any infrastructure requirements for this proposed development.
 - a. Transport: Significant work will be required to the A26 in order to provide safe and acceptable access arrangements. The entrance to Mabledon House is at a point where the speed limit is 40mph. Without improvements cars approaching from the A21 and Tonbridge will block the single-lane southbound carriageway when waiting to turn right into the hotel driveway. Additionally, there are no traffic signals or pedestrian crossings to enable pedestrians to cross the road.

- b. Water: The IDP only references “the expected increase in housing and population” in relation to future requirements to deliver the growth proposed in the Local Plan. A luxury hotel and spa will use a lot of water – for guest rooms, spa services, laundry, and cooking; maintenance of the renovated historic park and gardens will further add to this high demand. Wastewater requirement also need to be assessed. Is Mabledon House connected to Mains Sewage (a number of the private houses in the vicinity are not) and has the major increase in capacity been discussed with the supplier?
- 4. It is unclear how this allocation meets the Council’s key objective of reducing use of the private car, as employees are likely to be car-dependent for their journeys to work. Staffing for efficient operation of a luxury hotel, a spa, a conference suite and to maintenance of an historic park and garden will be high, with a pattern of 2 or 3 shifts per day. The site is beyond reasonable walking distance for employees living in much of the urban areas of Southborough, Royal Tunbridge Wells and Tonbridge and current bus services do not operate at the early morning and late evening times likely to be required by many staff. An on-road inter-urban cycle route at the A26 for this location will be unsafe for cyclists due to topography, narrow road widths and traffic volume and speeds.