

Examination of the Tunbridge Wells
Borough Local Plan

Tunbridge Wells Borough Council
Hearing Statement

**Matter 7: Residential Site
Allocations**
**Issue 4: Rusthall (Policy
PSTR/RU1)**

Document Reference: TWLP/050



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Matter 7 – Residential Site Allocations

Issue 4 – Rusthall (Policy PSTR/RU1)

AL/RU1 – Lifestyle Motor Europe, Langton Road

Inspector’s Question 1: [re. impact on heritage assets and how heritage assets have been taken into account]

What potential impacts will the proposed allocation have on the significance of designated heritage assets? How have heritage assets been taken into account in the preparation of the Plan?

TWBC response to Question 1

Introduction

1. The Council has carefully considered heritage assets in the plan-making process. In broad terms this is dealt with in the Council’s response to Matter 5, Issue 1 Site Selection Methodology, Question 3 [\[TWLP/021\]](#).
2. At the site-specific level, in this instance there are several heritage assets that have been considered in deciding to continue to allocate this site (the site being an existing allocation in the Site Allocations Local Plan, 2016 - Policy AL/RTW9) [\[CD 3.119\]](#), and which have informed the proposed policy wording in the Submission Local Plan.
3. The site lies wholly within the [Royal Tunbridge Wells Conservation Area](#) and there are listed buildings sited south-east of the site; these listed buildings are shown by the red hatching in Figure 1 below, along with the proposed allocation. These comprise numbers 1 Langton Road (Bransby Cottage), 3 Langton Road and numbers 5-11 Langton Road. All are grade II listed.



Figure 1: Site AL/RU1 and nearby Listed Buildings (shown by red hatch)

4. The site has been assessed in the Strategic Housing and Economic Land Availability Assessment (SHELAA). The SHELAA assessment sheet [\[CD 3.77o\]](#) also refers to a further heritage asset, an undesignated historic 'High Status Residence' and landscaped gardens known as 'Bishops Grove'. This was originally a single residence, remodelled and vastly extended, now known as the 'Spa Hotel', which is shown on Figure 1, sited north east of the proposed allocation site. The area around this residence has changed over time, including through development of the site AL/RU1 and the Tunbridge Wells Golf Course.

What potential impacts will the proposed allocation have on the significance of designated heritage assets?

5. The proposed allocation provides an opportunity to enhance the significance of the heritage assets. The site currently comprises a car dealership and ancillary service area. There is a large single storey building (and another single storey building set back further into the site). There are extensive areas of hardstanding on the site, including along the frontage with Langton Road, a distributor road leading into/out of Royal Tunbridge Wells. This current use as a car dealership means there are numerous vehicles continuously on show along the site frontage along with associated signage. This is not considered to make a positive contribution to the conservation area and particularly detracts from this part of it.

6. Through demolition and redevelopment of the site, the policy wording seeks to ensure an enhancement to both this part of the conservation area and the significance of the nearby listed buildings located along the Langton Road.
7. The site policy wording (at criterion 2) requires development proposals to be supported by a heritage statement and to propose a scheme that will conserve and enhance the conservation area and the setting/significance of the listed buildings, specifically numbers 1, 3 and 5-11 Langton Road.
8. The listed buildings are separated from the site by Langton Road situated on its southern side. A significant part of the setting/significance of these listed buildings largely comprises existing built form, particularly to the west towards the direction of site AL/RU1. The area to the east is less developed where the listed buildings lie adjacent to the Tunbridge Wells Common (shown on Figure 1 above). Harm can be avoided to these designated heritage assets, including the conservation area, with careful design and consideration of opportunities to enhance the assets, through demolition of the existing buildings on the garage site and reduction in the extent of hardstanding, for example, as well as through the provision of soft landscaping as part of any development proposal.

How have heritage assets been taken into account in the preparation of the Plan?

9. The Council's response to the Matter 5, Issue 1 (Site Selection Methodology) Question 3 [[TWLP/021](#)], sets out how the Council has taken the effects of development into account on a range of matters to inform decisions made about whether to allocate sites. The introduction explains that, in assessing and determining which sites to allocate, the Council has sought to take the effects of development into account. This has included consideration of how any effects arising from development could be mitigated, informing decisions about whether to allocate sites and, where allocated, details of site-specific policy wording and the extent of developable areas.
10. The Council's response to Question 3 (of Matter 5, Issue 1) includes the effects of development on heritage assets.
11. In summary, the response explains that heritage assets have been considered in the site assessment (SHELAA) process and that there has been involvement of the Council's Conservation and Urban Design Officer where there are heritage assets to be

considered, and with whom there has been continued discussion throughout the plan-making process. The evidence base relating to heritage is explained, along with engagement the Council has had with Historic England and Kent County Council (KCC) Heritage. The Council's response includes reference to The Duty to Cooperate Statement, November 2021 [[CD 3.132c\(v\)](#)] of the Submission Local Plan, which includes a comprehensive record of engagement and signed Statements of Common Ground (SoCG) with Historic England and KCC (which includes heritage matters).

Summary and Conclusion

12. The above response explains how heritage assets have been taken into account in the preparation of the Local Plan, in relation to the allocation of site AL/RU1, and the effects of the site allocation on the significance of heritage assets. These heritage assets include the Royal Tunbridge Wells Conservation Area and listed buildings along the Langton Road, namely numbers 1, 3 and 5-11. Heritage assets are recorded on the SHELAA site assessment sheet for this site [[CD 3.77o](#)] and have been considered through the site assessment process, informing the decision on whether to allocate the site.
13. The allocation provides an opportunity, including through the policy wording, to secure redevelopment of this brownfield site, which could enhance the significance of these heritage assets. This would be through demolition of existing built form which does not currently make a positive contribution to the conservation area or the setting/significance of the listed buildings.
14. For these reasons, the Council considers it appropriate to include this site in the Local Plan, a carrying forward of the site that is already allocated in the Site Allocations Local Plan, 2016 [[CD 3.119](#)].