



Historic England

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Date 30 April 2025

Dear Sir or Madam

### Tunbridge Wells Borough Council's Local Plan Main Modifications

Thank you for your email of 17 March 2025 inviting comments on the above consultation document.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.

#### Comments on Main Modifications (follows the order in the consultation document)

##### **MM19** - Policy STR 3 Brownfield Land

We support the amendment to point 3e in the policy to include a new reference to Policy EN 5: Heritage Assets Policy EN4: The Historic Environment.

##### **MM79** - Section 5: Strategic Sites

At Reg18 Consultation stage we requested a revision of the strategic policy STR/SS 1: The Strategy for Paddock Wood and land at east Capel. The suggested modifications to Policy STR/SS1 - The Strategy for Paddock Wood, etc. in particular the requirement for "a masterplan relating to each parcel (or combination of parcels)" are likely, in our view, to be beneficial in historic environment terms.

##### **MM81** - Policy STR/SS 1 Policy STR/SS 1 The Strategy for Paddock Wood, including land at east Capel

As above; we welcome also the inclusion of new bullet point 9 (b) relating to the integration of heritage assets and their settings into masterplans for the site.



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**MM84 - Section 5: The Strategy for Tudeley Village**

Our comments on the Regulation 18 stage draft Local Plan indicated that we were concerned about a number of potential impacts on the historic environment of the proposed allocation of a strategic site at Tudeley Village. We therefore support the removal of the strategic policy STR/SS 3: The Strategy for Tudeley Village from the Local Plan, and all references throughout the draft local plan in support of the Tudeley Village garden settlement proposal.

**MM92 – Section 5: Cranbrook and Sissinghurst**

We support the additional references to the conservation area, heritage assets and historic character (street plan) in the supporting text.

**MM142 - Section 5: Land south of Brenchley Road and west of Fromandez Drive**

We welcome the inclusion of references to the heritage assets that may be impacted by development of this site.

**MM143 - Policy AL/HO 2 Land south of Brenchley Road and west of Fromandez Drive**

We support the additional requirement in bullet point 9 that “Proposals for the site shall be informed by a heritage assessment ...”.

**MM160 - Land at Downingbury Farm (east), Maidstone Road**

We note and support the references that have been included in the supporting text and the policy relating to the significances of the adjacent heritage assets and the requirement to protect their settings.

**MM161 - Add new policy as follows: Policy AL/PE 4B**

We welcome the inclusion of the requirement, particularly at bullet point 3, for development of the site to “take account of the impact on the setting of heritage assets”.

**MM173 - Policy AL/SA 2 Sharps Hill Farm, Queen Street**

We welcome the revisions to the text of the policy to emphasise the need the assess impact on the heritage assets on the site.

**MM183 - Section 6: Historic Environment and Heritage Assets**

We support the modifications to the wording of this section and particularly welcome the introduction of the paragraph beginning “For any development proposal affecting a heritage asset, the submission of a heritage statement will be required with the planning application”. We welcome also specific reference to the Council’s Historic Environment Review and Local Heritage Assets SPD. The revised text relating to the statutory duty in respect of listed buildings, and to the NPPF requirements in respect of conservation areas, is helpful.

**MM184 - Policy EN 4 Historic Environment and Policy EN 5 Heritage Assets**

Support the modifications – they provide better clarity with respect to applications affecting heritage assets. The need to address Heritage at risk is recognised.



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**MM234** - Policy ED 5 Policy ED 5 Conversion of Rural Buildings outside the Limits to Built Development

We support the additional reference in this policy at bullet point b. to retention of farm buildings for their historic or architectural value.

**MM256** - Appendix 3: The Monitoring Framework

We support the modified monitoring criteria for Policy EN4 and particularly the additional criterion in relation to heritage at risk.

We have no comments on the other proposed Main Modifications to the draft Local Plan.

We should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals which may subsequently arise where we consider that these would have an adverse effect upon the historic environment. We hope that these comments are useful.

*Yours sincerely*

*Alan Byrne*

Historic Environment Planning Adviser



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