

HERITAGE STATEMENT

NEW WHARF ROAD, TONBRIDGE

Quality Assurance

Site name: New Wharf Road
Tonbridge

Client name: McCarthy & Stone Ltd

Type of report: Heritage Statement

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Signed



Date 25 May 2021

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Signed



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Appendix 1

STATUTORY LIST DESCRIPTIONS

1.0 Introduction

- 1.1 This Heritage Statement has been prepared on behalf of McCarthy & Stone Ltd to support the proposed redevelopment of an area of land on New Wharf Road, Tonbridge, hereafter known as 'the site'.
- 1.2 The site is located adjacent to the Tonbridge Conservation Area. It is also in proximity to a number of heritage assets including Tonbridge Castle which is a Scheduled Ancient Monument and is Grade I Listed.

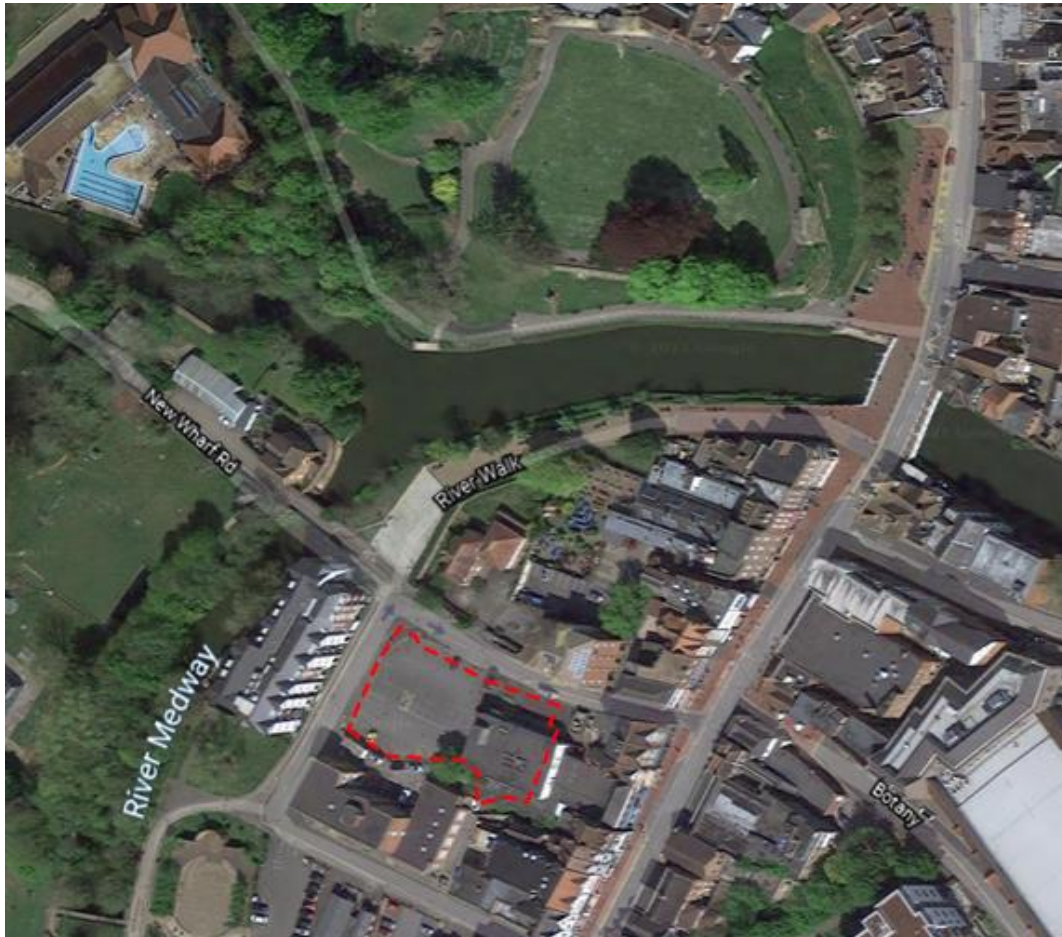


Figure 1 - Site location on aerial photograph

- 1.3 This Heritage Statement includes a Significance Assessment which identifies the relative heritage value of the identified heritage assets and an Impact Assessment which considers the potential impact of the proposed development on the significance of the heritage assets identified, including the contribution made by setting. This approach to impact-assessment is required in order to satisfy the provisions of Sections 66(1) and 72(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990 and the National Planning Policy Framework (NPPF) where the impact of development on a heritage asset is being considered (Paragraphs 193-197).
- 1.4 This document has been prepared by Daniele Haynes BA(Hons) MSc (Senior Heritage Consultant) and reviewed by Chris Surfleet MA MSc PGDipUD IHBC (Partner, Head of Heritage).

2.0 Heritage Legislation, Policy and Guidance summary

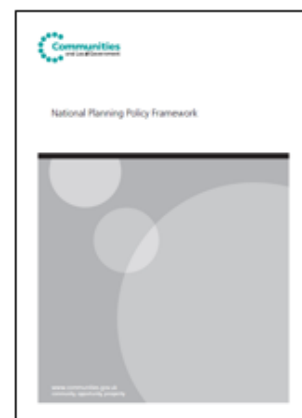
National Policy

Planning (Listed Buildings & Conservation Areas) Act 1990

- 2.1 The primary legislation relating to Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings & Conservation Areas) Act 1990.
- Section 66(1) reads: *“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*
 - In relation to development *within* Conservation Areas, Section 72(1) reads: *“with respect to any buildings or other land in a conservation area...special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”.*
- 2.2 As the site is located outside the boundary of Conservation Area, Section 72(1) is not relevant; however, the setting of the asset will be considered in accordance with relevant policy.

National Planning Policy Framework

- 2.3 The National Planning Policy Framework (NPPF) was published on 19th February 2019, replacing the previously-published 2012 and 2018 Frameworks. With regard to the historic environment, the over-arching aim of the policy remains in line with philosophy of the 2012 framework, namely that *“our historic environments... can better be cherished if their spirit of place thrives, rather than withers.”* The relevant policy is outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’.
- 2.4 This chapter reasserts that heritage assets can range from sites and buildings of local interest to World Heritage Sites considered to have an Outstanding Universal Value. The NPPF subsequently requires these assets to be conserved in a *“manner appropriate to their significance”* (Paragraph 184).
- 2.5 NPPF directs local planning authorities to require an applicant to *“describe the significance of any heritage assets affected, including any contribution made by their setting”* and the level of detailed assessment should be *“proportionate to the assets’ importance”* (Paragraph 189).
- 2.6 Paragraph 190 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the impact of a proposal, *“to avoid conflict between the heritage asset’s conservation and any aspect of the proposal”*. This paragraph therefore results in the need for an analysis of the impact of a proposed development on the asset’s relative significance, in the form of a Heritage Impact Assessment.



- 2.7 Paragraph 193 requires that “*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*”
- 2.8 It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, “*clear and convincing justification*” (Paragraph 194). This paragraph outlines that substantial harm to grade II listed heritage assets should be exceptional, rising to ‘wholly exceptional’ for those assets of the highest significance such as scheduled monuments, Grade I and grade II* listed buildings or registered parks and gardens as well as World Heritage Sites.
- 2.9 In relation to harmful impacts or the loss of significance resulting from a development proposal, Paragraph 195 states the following:
- “Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*
- a) the nature of the heritage asset prevents all reasonable uses of the site; and*
 - b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
 - c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
 - d) the harm or loss is outweighed by the benefit of bringing the site back into use.”*
- 2.10 The NPPF therefore requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of proposals which would result in “less than substantial harm”, paragraph 196 provides the following:
- “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use.”*
- 2.11 It is also possible for proposals, where suitably designed, to result in no harm to the significance of heritage assets.
- 2.12 In the case of non-designated heritage assets, Paragraph 197 requires a Local Planning Authority to make a “balanced judgement” having regard to the scale of any harm or loss and the significance of the heritage asset.
- 2.13 The NPPF therefore recognises the need to clearly identify relative significance at an early stage and then to judge the impact of development proposals in that context.

Planning Practice Guidance (PPG) (2019)

- 2.14 The Planning Practice Guidance (PPG) was originally published in March 2014 although it has been subsequently updated over time. The 'Conserving and Enhancing the Historic Environment' section of this guidance was last updated on 23 July 2019.
- 2.15 In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance and explains how the tests of harm and impact within the NPPF are to be interpreted.
- 2.16 In particular, the PPG notes the following in relation to the evaluation of harm: *"In determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest."* (Ref ID: 18a-018-20190723).
- 2.17 This guidance therefore provides assistance in defining where levels of harm should be set, tending to emphasise substantial harm as a "high test".

Historic England Conservation Principles: Policies and Guidance 2008



- 2.18 Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of the historic environment, including changes affecting significant places. It states that:

"New work or alteration to a significant place should normally be acceptable if: a. there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place; b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed; c. the proposals aspire to a quality of design and execution which may be valued now and in the future; d. the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future" (page 59).

Historic England Making Changes to Heritage Assets Advice Note 2 (February 2016)

- 2.19 This advice note provides information on repair, restoration, addition and alteration works to heritage assets. It advises that *"The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting."* (page 10)

Historic England Managing Significance in Decision Taking in the Historic Environment Historic Environment Good Practice Advice (GPA) in Planning Note 2 (March 2015)

- 2.20 This advice note sets out clear information to assist all relevant stake holders in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). These include: “*assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.*” (page 1)

Historic England The Setting of Heritage Assets Historic Environment Good Practice Advice (GPA) in Planning Note 3 (Second Edition) (December 2017)

- 2.21 This document presents guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas and landscapes. Page 6, entitled: ‘*A staged approach to proportionate decision taking*’ provides detailed advice on assessing the implications of development proposals and recommends the following broad approach to assessment, undertaken as a series of steps that apply equally to complex or more straightforward cases:
- Step 1: Identify which heritage assets and their settings are affected
 - Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated
 - Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it
 - Step 4: Explore ways to maximise enhancement and avoid or minimise harm
 - Step 5: Make and document the decision and monitor outcomes

Historic England Analysing Significance in Heritage Assets Advice Note 12 (October 2019)

- 2.22 This document provides guidance on the NPPF requirement for applicants to describe heritage significance in order to aid local planning authorities’ decision making. It reiterates the importance of understanding the significance of heritage assets, in advance of developing proposals. This advice note outlines a staged approach to decision-making in which assessing significance precedes the design and also describes the relationship with archaeological desk-based assessments and field evaluations, as well as with Design and Access Statements.
- 2.23 The advice in this document, in accordance with the NPPF, emphasises that the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance. This advice also addresses how an analysis of heritage significance could be set out before discussing suggested structures for a statement of heritage significance.

Local Policy

Tonbridge Core Strategy (2007)

- 2.24 The Core Strategy sets out the Council's vision, aims and objectives which will determine the future pattern of development in the Borough over the period up until 2021. The document was formally adopted by the council on the 25th September 2007. The following policies are considered to be of relevance:

2.25 Policy CP1 Sustainable Development

3. *...The need for development will be balanced against the need to protect and enhance the natural and built environment. In selecting locations for development and determining planning applications the quality of the natural and historic environment, the countryside, residential amenity and land, air and water quality will be preserved and, wherever possible, enhanced...*

2.26 Policy CP24 Achieving a High Quality Environment

1. *All development must be well designed and of a high quality in terms of detailing and use of appropriate materials, and must through its scale, density, layout, siting, character and appearance be designed to respect the site and its surroundings.*
2. *All development should accord with the detailed advice contained in Kent Design, By Design and Secured by Design and other Supplementary Planning Documents such as Village Design Statements and Planning Briefs and, wherever possible, should make a positive contribution towards the enhancement of the appearance and safety of the area.*
3. *Development which by virtue of its design would be detrimental to the built environment, amenity or functioning and character of a settlement or the countryside will not be permitted.*
4. *The Council will seek to protect, and wherever possible, enhance, existing open spaces, including the provision of public art and ensure that new open space provision is made to meet the future needs of the Borough.*
5. *The environment within river corridors, including the landscape, water environment and wildlife habitats, will be conserved and enhanced. Where consistent with this intention, provision will be made for increased public access for walking, cycling and water-related recreation. Any new development adjacent to the river should respect its sensitive location and the local character at that particular section of the river and should aim to improve the appearance and biodiversity of the riverside.*

2.27 Policy CP25 Mitigation of Development Impacts

2. *...Where development that causes material harm to a natural or historic resource is exceptionally justified, appropriate mitigation measures will be required to minimise or counteract any adverse impacts. Where the implementation of appropriate mitigation is still likely to result in a residual adverse impact then compensatory measures will be required...*

Tonbridge Central Area Action Plan (2008)

2.28 The Central Area Action Plan sets out a spatial strategy for the regeneration of the central area of Tonbridge. The document was adopted by the council on the 22nd April 2008. The following policies are considered to be of relevance:

2.29 Policy TCA1 Quality of Development

Development within the Central Area of Tonbridge, will be required to satisfy the following requirements: ...

- b) *proposals must provide a well designed, animated frontage adjoining all streets, squares, bridges, gateways and other public spaces through the location of doors and entrances,*

principal windows, shop fronts (or shop window displays where non-retail uses are accepted in retail units), balconies or other features, providing a clear definition, but seamless character between public and private space;

- c) proposals must make provision for, or not prejudice the provision of, a connected network of streets, footpaths and cyclepaths, which is integrated within the existing street network, giving priority to pedestrians through the design and layout of all routes, width of pavements and positioning of crossings, and permitting appropriate access for service and emergency vehicles;*
- d) car, motorcycle and bicycle parking provision must be integrated into the design and layout of development, and minimise visual impact within the public realm;*
- e) the design of development, encompassing scale, layout, site coverage, and orientation of buildings, external appearance, roofscape (including any necessary provision for the screening of service plant), materials and hard and soft landscape, must respect the context of the site and the character of the part of the Town Centre within which it is located, especially when viewed from the Castle and from high view points to the south of the Town Centre, and facilitate the proper use of CCTV; and*
- f) a mix of land uses will be sought on individual sites where consistent with other policies in the plan, but regard should be had to the compatibility of neighbouring uses. New development should not cause harm to the amenities or character of the area in terms of noise, vibration, smell, safety or health, traffic or other impacts.*

2.30 Policy TCA5 Upper High Street

- 1. In the Upper High Street area, as defined on the Proposals Map, development should enhance the attractiveness of the Conservation Area. Development which would contribute to the area's tourism offer will be positively sought. Buildings of importance in the street scene need to be retained and refurbished whilst others of less quality could be redeveloped. Any such development should actively promote and enhance the architectural, archaeological and historic features of Tonbridge Town Centre including;*
 - a) listed buildings and their settings;*
 - b) buildings which although not listed, form an integral part of Tonbridge Conservation Area and its setting;*
 - c) the street pattern and historic property boundaries; and ...*
- 2. Proposals for non-retail uses at street level will be considered favourably if they satisfy the following criteria:*
 - a) the vitality and viability of the area as a shopping destination is maintained without cumulatively creating an over concentration of non-retail uses within a continuous block, as identified in Fig 5;*
 - b) a contribution is made to the street scene in terms of high quality design while promoting a safe environment; ...*
 - d) the levels of traffic generation and the visual impact of car parking/servicing arrangements or other environmental problems which could have an adverse impact on the character of the area are limited; and*

- e) *the character and appearance of the Tonbridge Conservation Area is preserved.*

Managing Development and the Environment Development Plan Document (2010)

- 2.31 The Managing Development and the Environment Development Plan Document contains development management policies aimed at maintaining and enhancing environmental quality whilst preserving a sense of place. It was adopted by the Council on the 20 April 2010.
- 2.32 Policy SQ1 Landscape and Townscape Protection and Enhancement
1. *Proposals for development will be required to reflect the local distinctiveness, condition and sensitivity to change of the local character areas as defined in the Character Area Appraisals SPD.*
 2. *All new development should protect, conserve and, where possible, enhance:*
 - a) *the character and local distinctiveness of the area including its historical and architectural interest and the prevailing level of tranquillity;*
 - b) *the distinctive setting of, and relationship between, the pattern of settlement, roads and the landscape, urban form and important views; and*
 - c) *the biodiversity value of the area, including patterns of vegetation, property boundaries and water bodies.*
- 2.33 Policy SQ2 Locally Listed Buildings
- Buildings included within the Local List of Buildings of Architectural or Historic Interest adopted by the Council will be retained wherever possible and protected from development that would harm their setting or local historic or architectural interest.*

3.0 Methodology

Heritage Assets

- 3.1 A heritage asset is defined within the National Planning Policy Framework as “*a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)*” (NPPF Annex 2: Glossary).
- 3.2 To be considered a heritage asset “*an asset must have some meaningful archaeological, architectural, artistic, historical, social or other heritage interest that gives it value to society that transcends its functional utility. Therein lies the fundamental difference between heritage assets and ordinary assets; they stand apart from ordinary assets because of their significance – the summation of all aspects of their heritage interest.*” (‘Managing Built Heritage: The Role of Cultural Values and Significance’ Stephen Bond and Derek Worthing, 2016.)
- 3.3 ‘Designated’ assets have been identified under the relevant legislation and policy including, but not limited to: World Heritage Sites, Scheduled Monuments, Listed Buildings, and Conservation Areas. ‘Non-designated’ heritage assets are assets which fall below the national criteria for designation.
- 3.4 The absence of a national designation should not be taken to mean that an asset does not hold any heritage interest. The Planning Policy Guidance (PPG) states that “*non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.*” (Paragraph: 039 Reference ID: 18a-039-20190723)
- 3.5 The PPG goes on to clarify that “*a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.*”

Meaning of Significance

- 3.6 The concept of significance was first expressed within the 1979 Burra Charter (Australia ICOMOS, 1979). This charter has periodically been updated to reflect the development of the theory and practice of cultural heritage management, with the current version having been adopted in 2013. It defines cultural significance as the “*aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects. Places may have a range of values for different individuals or groups*” (Page 2, Article 1.2)
- 3.7 The NPPF (Annex 2: Glossary) also defines significance as “*the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.*”
- 3.8 Significance can therefore be considered to be formed by “*the collection of values associated with a heritage asset.*” (‘Managing Built Heritage: The Role of Cultural Values and Significance’ Stephen Bond and Derek Worthing, 2016.)

Assessment of Significance/Value

- 3.9 It is important to be proportionate in assessing significance as required in both national policy and guidance as set out in paragraph 189 of NPPF.
- 3.10 The Historic England document ‘Conservation Principles’ states that “*understanding a place and assessing its significance demands the application of a systematic and consistent process, which is appropriate and proportionate in scope and depth to the decision to be made, or the purpose of the assessment.*”
- 3.11 The document goes on to set out a process for assessment of significance, but it does note that not all of the stages highlighted are applicable to all places/ assets.
- Understanding the fabric and evolution of the asset;
 - Identify who values the asset, and why they do so;
 - Relate identified heritage values to the fabric of the asset;
 - Consider the relative importance of those identified values;
 - Consider the contribution of associated objects and collections;
 - Consider the contribution made by setting and context;
 - Compare the place with other assets sharing similar values;
 - Articulate the significance of the asset.
- 3.12 At the core of this assessment is an understanding of the value/significance of a place. There have been numerous attempts to categorise the range of heritage values which contribute to an asset’s significance. Historic England’s ‘*Conservation Principles*’ sets out a grouping of values as follows:

Evidential value – ‘*derives from the potential of a place to yield evidence about past human activity...Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them...The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.*’ (Page 28)

Aesthetic Value – ‘*Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects...Aesthetic values tend to be specific to a time cultural context and appreciation of them is not culturally exclusive.*’ (Pages 30-31)

Historic Value – ‘*derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative... Association with a notable family, person, event, or movement gives historical value a particular resonance...The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value.*’ (Pages 28-30)

Communal Value – “*Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it... Social value is*

associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them...They may relate to an activity that is associated with the place, rather than with its physical fabric...Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there". (Pages 31-32)

- 3.13 Value-based assessment should be flexible in its application, it is important not to oversimplify an assessment and to acknowledge when an asset has a multi-layered value base, which is likely to reinforce its significance.

Contribution of setting/context to significance

- 3.14 In addition to the above values, the setting of a heritage asset can also be a fundamental contributor to its significance - although it should be noted that 'setting' itself is not a designation. The value of setting lies in its contribution to the significance of an asset. For example, there may be instances where setting does not contribute to the significance of an asset at all.
- 3.15 Historic England's Conservation Principles defines setting as "an established concept that relates to the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape."
- 3.16 It goes on to state that "*context embraces any relationship between a place and other places. It can be, for example, cultural, intellectual, spatial or functional, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity, or sharing characteristics with other places*" (page 39).
- 3.17 In order to understand the role of setting and context to decision-making, it is important to have an understanding of the origins and evolution of an asset, to the extent that this understanding gives rise to significance in the present. Assessment of these values is not based solely on visual considerations but may lie in a deeper understanding of historic use, ownership, change or other cultural influence – all or any of which may have given rise to current circumstances and may hold a greater or lesser extent of significance.
- 3.18 The importance of setting depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation. It is important to note that impacts that may arise to the setting of an asset do not, necessarily, result in direct or equivalent impacts to the significance of that asset(s).

Assessing Impact

- 3.19 It is evident that the significance/value of any heritage asset(s) requires clear assessment to provide a context for, and to determine the impact of, development proposals. Impact on that value or significance is determined by first considering the sensitivity of the receptors identified which is best expressed by using a hierarchy of value levels.
- 3.20 There are a range of hierarchical systems for presenting the level of significance in use; however, the method chosen for this project is based on the established 'James Semple Kerr method' which has been adopted by Historic England, in combination with the impact assessment

methodology for heritage assets within the *Design Manual for Roads and Bridges* (DMRB: HA208/13) published by the Highways Agency, Transport Scotland, the Welsh Assembly Government and the department for Regional Development Northern Ireland. This 'value hierarchy' has been subject to scrutiny in the UK planning system, including Inquiries, and is the only hierarchy to be published by a government department.

- 3.21 The first stage of our approach is to carry out a thoroughly researched assessment of the significance of the heritage asset, in order to understand its value:

SIGNIFICANCE	EXAMPLES
Very High	World Heritage Sites, Listed Buildings, Scheduled Monuments and Conservation Areas of outstanding quality, or built assets of acknowledged exceptional or international importance, or assets which can contribute to international research objectives. Registered Parks & Gardens, historic landscapes and townscapes of international sensitivity.
High	World Heritage Sites, Listed Buildings, Scheduled Monuments, Conservation Areas and built assets of high quality, or assets which can contribute to international and national research objectives. Registered Parks & Gardens, historic landscapes and townscapes which are highly preserved with excellent coherence, integrity, time-depth, or other critical factor(s).
Good	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) with a strong character and integrity which can be shown to have good qualities in their fabric or historical association, or assets which can contribute to national research objectives. Registered Parks & Gardens, historic landscapes and townscapes of good level of interest, quality and importance, or well preserved and exhibiting considerable coherence, integrity time-depth or other critical factor(s).
Medium/ Moderate	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) that can be shown to have moderate qualities in their fabric or historical association. Registered Parks & Gardens, historic landscapes and townscapes with reasonable coherence, integrity, time-depth or other critical factor(s).
Low	Listed Buildings, Scheduled Monuments and built assets (including locally listed buildings and non-designated assets) compromised by poor preservation integrity and/or low original level of quality of low survival of contextual associations but with potential to contribute to local research objectives. Registered Parks & Gardens, historic landscapes and townscapes with modest sensitivity or whose sensitivity is limited by poor preservation, historic integrity and/or poor survival of contextual associations.
Negligible	Assets which are of such limited quality in their fabric or historical association that this is not appreciable. Historic landscapes and townscapes of limited sensitivity, historic integrity and/or limited survival of contextual associations.
Neutral/ None	Assets with no surviving cultural heritage interest. Buildings of no architectural or historical note. Landscapes and townscapes with no surviving legibility and/or contextual associations, or with no historic interest.

- 3.22 Once the value/ significance of an asset has been assessed, the next stage is to determine the assets 'sensitivity to change'. The following table sets out the levels of sensitivity to change, which is based upon the vulnerability of the asset, in part or as a whole, to loss of value through change. Sensitivity to change can be applied to individual elements of a building, or its setting, and may differ across the asset.
- 3.23 An asset's sensitivity level also relates to its capacity to absorb change, either change affecting the asset itself or change within its setting (remembering that according to Historic England The Setting of Heritage Assets – Planning Note 3, 'change' does not in itself imply harm, and can be neutral, positive or negative in effect).
- 3.24 Some assets are more robust than others and have a greater capacity for change and therefore, even though substantial changes are proposed, their sensitivity to change or capacity to absorb change may still be assessed as low.

SENSITIVITY	EXPLANATION OF SENSITIVITY
High	High Sensitivity to change occurs where a change may pose a major threat to a specific heritage value of the asset which would lead to substantial or total loss of heritage value.
Moderate	Moderate sensitivity to change occurs where a change may diminish the heritage value of an asset, or the ability to appreciate the heritage value of an asset.
Low	Low sensitivity to change occurs where a change may pose no appreciable threat to the heritage value of an asset.

- 3.25 Once there is an understanding of the sensitivity an asset holds, the next stage is to assess the 'magnitude' of the impact that any proposed works may have. Impacts may be considered to be adverse, beneficial or neutral in effect and can relate to direct physical impacts, impacts on its setting, or both. Impact on setting is measured in terms of the effect that the impact has on the significance of the asset itself – rather than setting itself being considered as the asset.

MAGNITUDE OF IMPACT	TYPICAL CRITERIA DESCRIPTORS
Very High	<p>Adverse: Impacts will destroy cultural heritage assets resulting in their total loss or almost complete destruction.</p> <p>Beneficial: The proposals would remove or successfully mitigate existing and significant damaging and discordant impacts on assets; allow for the substantial restoration or enhancement of characteristic features.</p>
High	<p>Adverse: Impacts will damage cultural heritage assets; result in the loss of the asset's quality and integrity; cause severe damage to key characteristic features or elements; almost complete loss of setting and/or context of the asset. The assets integrity or setting is almost wholly destroyed or is severely compromised, such that the resource can no longer be appreciated or understood.</p> <p>Beneficial: The proposals would remove or successfully mitigate existing damaging and discordant impacts on assets; allow for the restoration or enhancement of characteristic features; allow the substantial re-establishment of the integrity, understanding and setting for an area or group of features; halt rapid degradation and/or erosion of the heritage resource, safeguarding substantial elements of the heritage resource.</p>

Medium	<p><u>Adverse:</u> Moderate impact on the asset, but only partially affecting the integrity; partial loss of, or damage to, key characteristics, features or elements; substantially intrusive into the setting and/or would adversely impact upon the context of the asset; loss of the asset for community appreciation. The assets integrity or setting is damaged but not destroyed so understanding and appreciation is compromised.</p> <p><u>Beneficial:</u> Benefit to, or partial restoration of, key characteristics, features or elements; improvement of asset quality; degradation of the asset would be halted; the setting and/or context of the asset would be enhanced and understanding and appreciation is substantially improved; the asset would be bought into community use.</p>
Minor/Low	<p><u>Adverse:</u> Some measurable change in assets quality or vulnerability; minor loss of or alteration to, one (or maybe more) key characteristics, features or elements; change to the setting would not be overly intrusive or overly diminish the context; community use or understanding would be reduced. The assets integrity or setting is damaged but understanding and appreciation would only be diminished not compromised.</p> <p><u>Beneficial:</u> Minor benefit to, or partial restoration of, one (maybe more) key characteristics, features or elements; some beneficial impact on asset or a stabilisation of negative impacts; slight improvements to the context or setting of the site; community use or understanding and appreciation would be enhanced.</p>
Negligible	Barely discernible change in baseline conditions
Nil	No change in baseline conditions.

Summary

- 3.26 The aim of this Heritage Statement is to identify and assess any impacts that the proposed development may cause to the value or significance of the identified heritage assets and/or their settings.
- 3.27 Overall, it is a balanced understanding of the foreseeable likely effect of proposals on significance as a result of predicted impacts which is being sought through undertaking this process. It should be clearly understood that the level of detail provided within these assessments is *“proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance”* as set out in Paragraph 189 of the National Planning Policy Framework.

4.0 Heritage Assets

- 4.1 This section identifies heritage assets which relate to the site. In the case of this application submission, the following heritage assets have a relationship with the proposed development and have been identified as they may be affected by the current proposals. The identification of these assets is consistent with 'Step 1' of the GPA3 The Setting of Heritage Assets.
- 4.2 Although there are other built heritage assets within the local surrounding area, the location and significance of many of them results in them having no perceptible relationship with the proposed development site. For this reason, only the built heritage assets which may be considered to be affected by the proposals have been identified.
- 4.3 In the case of this application, the following designated heritage assets may be regarded as being potentially affected by the proposals:
1. Tonbridge Conservation Area
 2. Tonbridge Castle



Figure 2 Map showing the location of the assets discussed within this report

- 4.4 The relevant Statutory List Description can be found in Appendix 1.

5.0 The Existing Site

- 5.1 The following images are included to present the condition and appearance of the site in its current form.



Figure 3 View of the site from the junction of New Wharf Road and River Walk. The site contains the flat-roofed, rear elevation of the Poundland store and the boxy, 3-storey form of the Job Centre on Bradford St.



Figure 4 View northwards along River Walk and the north-western boundary of the site looking toward the Castle



Figure 5 View from the Castle motte looking southwards towards the site. The roofscape contains a range of scales and profiles.

6.0 Historic Context

- 6.1 A settlement at Tonbridge was first recorded in the Domesday survey of 1086, registered as being held by the Bishop of Rochester. The medieval town was dominated by the Norman castle with the built form of the town was mostly located on the higher ground to the north of the river, as can be seen in Dury's *Topographical Map of the County of Kent* below.

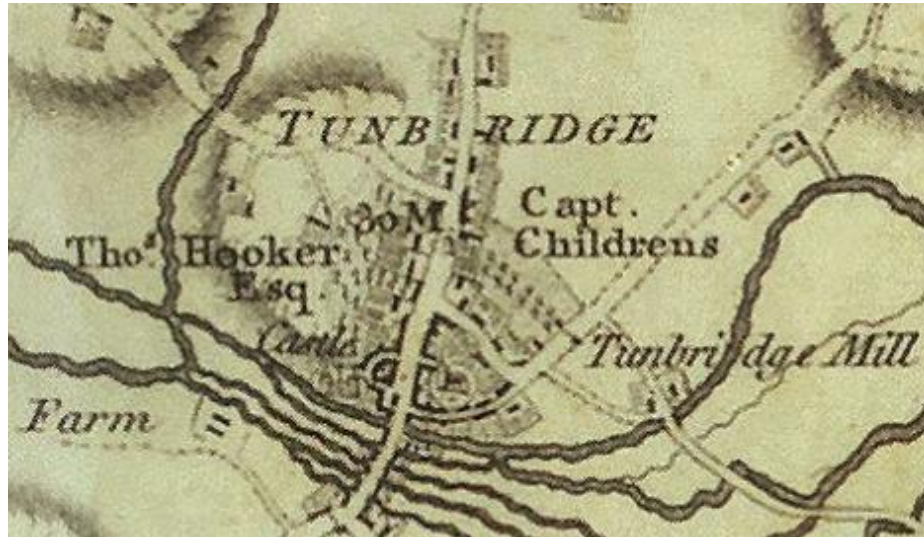


Figure 6 Extract from Dury's Topographical Map of the County of Kent, 1769

- 6.2 The town has always been a strategic settlement with numerous routes between London and the south coast passing through it. The arrival of the railway in the town encouraged growth to the south of the Medway during the late 19th century.



Figure 7: Extract from the 1871 OS Map

Map Regression

- 6.3 An initial review of available historic maps has been undertaken to assist in the understanding of the site's history. Although such information cannot be considered to be definitive, experience shows that the mapping is often relatively accurate and reliable - particularly the later Ordnance Survey (OS) maps - and taken together with written archival date and physical evidence can help to refine the history of a site.
- 6.4 The 1867 OS map below shows the site as a mostly undeveloped space behind the High Street with only a few small terraced properties positioned in the north-east along New Wharf Road.



Figure 8 Extract from the 1867 OS Map with the approximate site boundary marked in red.

- 6.5 Little appears to have changed within the site during the latter years of the 19th century, with the exception of the construction of a large Baptist Chapel with a frontage onto the High Street and a rear range which extended into the site.



Figure 9 Extract from the 1908 OS Map with the approximate site boundary marked in red.

- 6.6 By the mid-20th century, the area around the site saw a greater level of development with structures like a Picture Theatre built in the south. On the site itself, a hall had been constructed in the west. The Hall was the social club for Brown, Knight and Truscott and was used as a music and dance venue, a bingo hall and for various other social events.

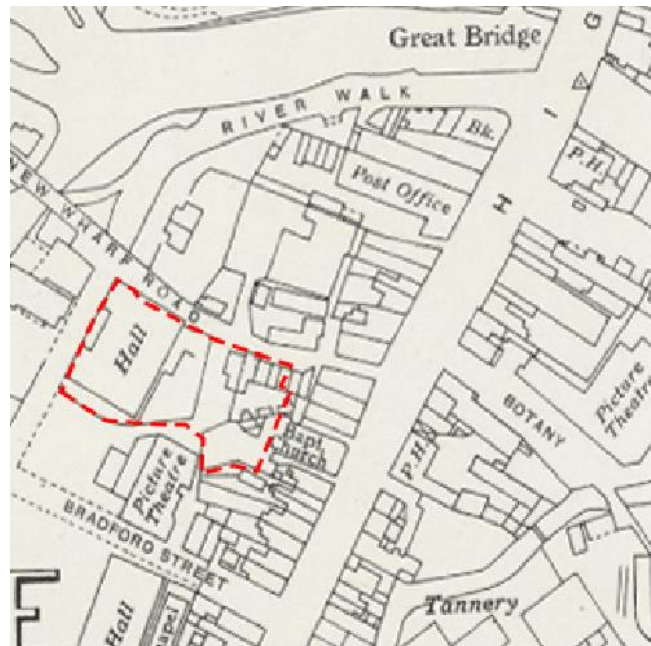


Figure 10 5 Extract from the 1945 OS Map with the approximate site boundary marked in red.

- 6.7 As can be seen in the following historic aerials, the hall was a large structure appearing to be of a similar height to the surrounding built form, albeit of a far larger footprint, making it a notable feature in the streetscape. The structures in the east of the site were two storey dwellings.



Figure 11 Aerial from 1939 with the site outlined; Britain from Above

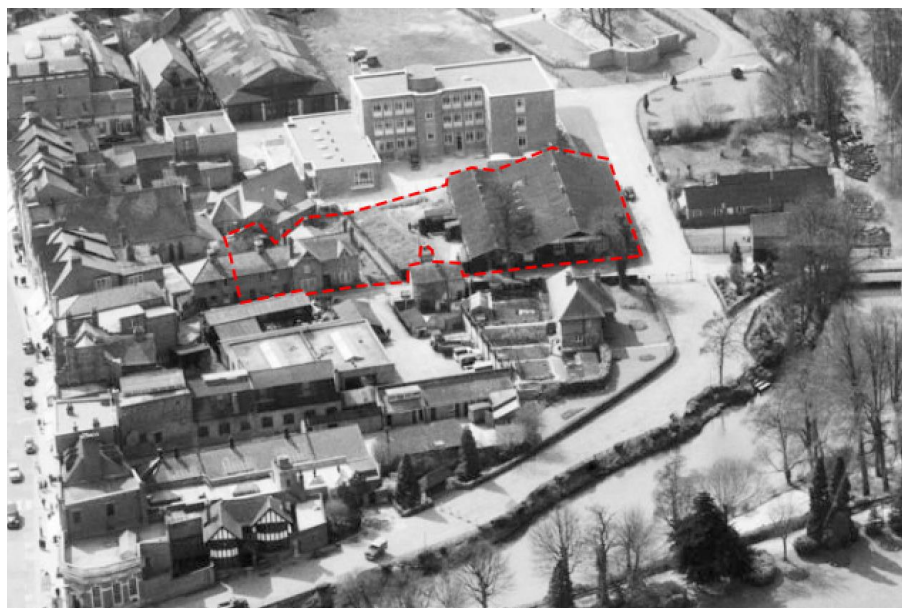


Figure 12 Aerial from 1953 with the site outlined; Britain from Above

- 6.8 In 1970, however, permission was granted for the demolition of all of the buildings on the site including the hall and the adjacent Baptist Chapel. These were replaced by a supermarket with car parking to the rear. In the north-east of the site, an electric substation had also been constructed.

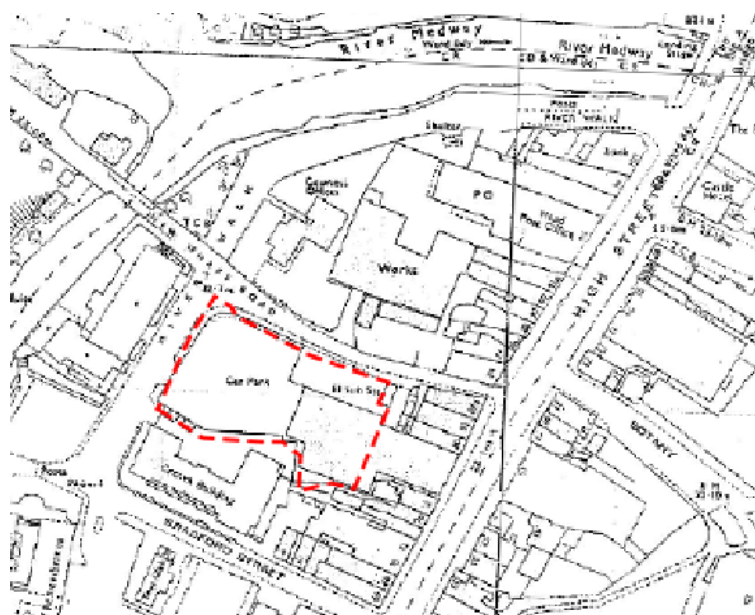


Figure 13 Extract from the 1980-1990 OS Map with the approximate site boundary marked in red.

7.0 Significance Assessment

Tonbridge Conservation Area

- 7.1 Tonbridge Conservation Area was first designated in 1969 and was subsequently extended in 1981, 1985, 1990 and 2008. The designation focuses on the historic town extending from Yardley Park Road in the north down to the southern offshoot of the River Medway in the south.

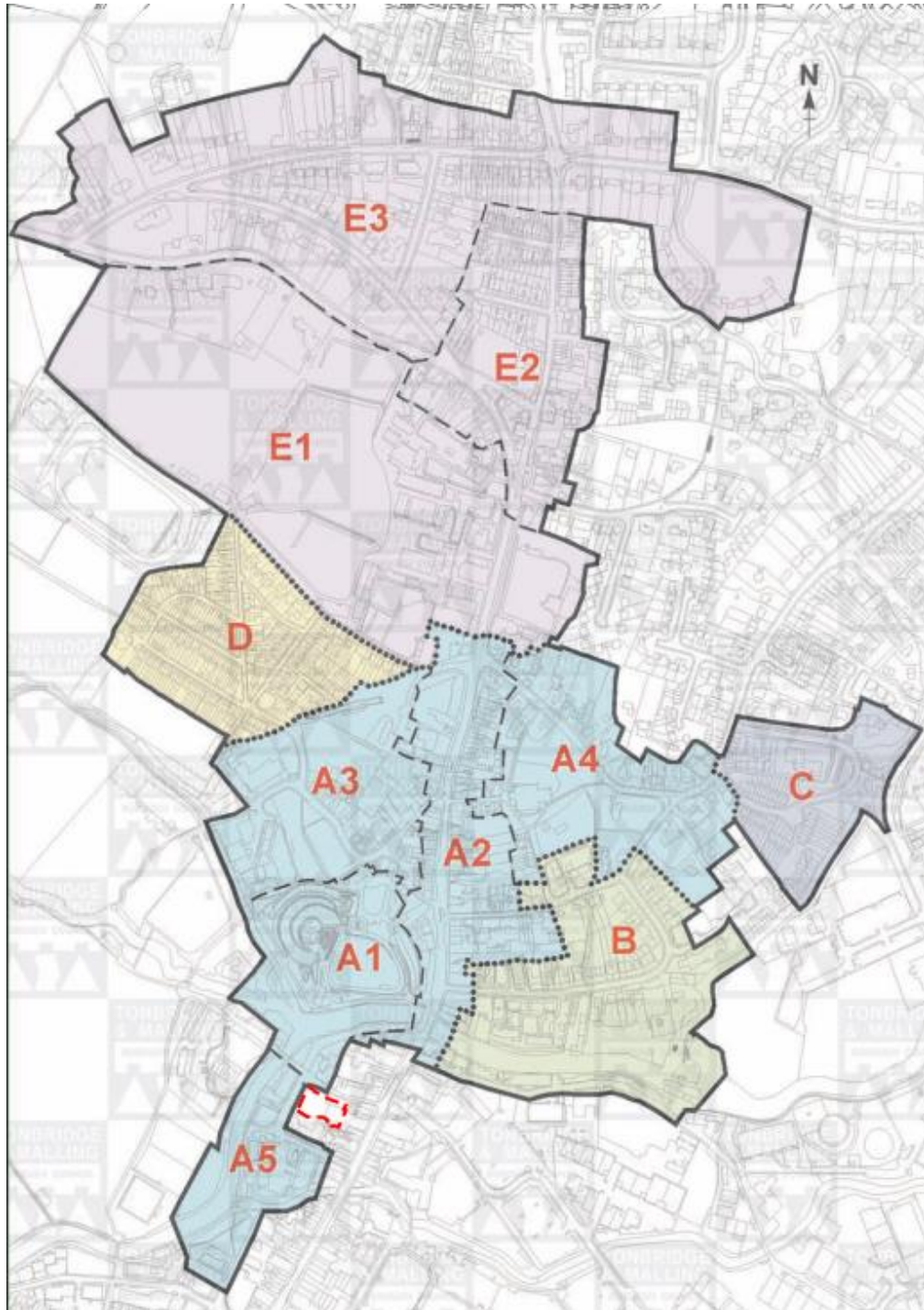


Figure 14 Map of the Tonbridge Conservation Area with the site marked in red; Tonbridge and Malling Borough Council

- 7.2 The Conservation Area retains much of the medieval road layout, with the High Street forming the spine of the area and narrower streets and alleys ways branching off from it. Historic features such as the castle, the fosse and surviving former coaching inns clearly demonstrate the town's historic importance. In addition, the extension of the Conservation Area along the River Medway in the south incorporates the historic wharf areas, demonstrating the town's historic riverside industry and relationship to the river.
- 7.3 A number of the buildings fronting onto the High Street are of medieval origin, resulting in narrow frontages and a fairly regular height and scale. However, the buildings were often refaced or replaced over the centuries, resulting in a range of ages and elevational styles. The historic roads and alleyways leading off the High Street have been developed in a more piecemeal fashion, creating a varied building line and a busy and chaotic, backland character. There is a real contrast between the form and character of the historic core and the later development areas in the northern part of the designation. Here, the built form has a very regular and domestic appearance being formed of Victorian terraces and semi-detached properties.
- 7.4 A number of the buildings within the Conservation Area have been included on the Statutory List of Buildings of Special Architectural or Historic Interest. They are predominantly positioned along the High Street. The buildings are mostly listed at Grade II although there are four Grade II* and the castle is Grade I. The castle is also a Scheduled Monument, as are the remains of the fosse.
- 7.5 There are a number of large open spaces within the designation, the largest of which is the playing field associated with and found to the rear of Tonbridge School. The most notable open space, however, is found around the castle. The greenery of the area ensures that the castle stands apart from the more densely-developed High Street due to its open and green character.
- 7.6 Overall, the Tonbridge Conservation Area is considered to hold a **good** level of significance as a developed medieval town and through its historic importance as a strategic town.

Setting

- 7.7 Beyond the boundaries of the Conservation Area are areas of the town's later expansion. Those areas nearer to the centre of the town have a strongly commercial character whilst those beyond the town centre are far more suburban in character, ensuring that the designated area can be easily distinguished. To the west of the castle, however, Racecourse Park forms an area of green space which leads on to open fields. Here, the Conservation Area has a far more rural setting which helps to further distinguish the castle from the developed town. The setting of the Tonbridge Conservation Area is therefore considered to make a **moderate beneficial** contribution to its significance.

Contribution of the site

- 7.8 The site is located adjacent to the Conservation Area's boundary on River Walk. In its current form, the site has an ancillary, hinterland character as a result of its car park and ancillary retail use, which contrasts to the busy High Street and the green character of the adjacent designated area. Within the Conservation Area Appraisal (2008), the site is described as "*[providing] a disappointing setting for the Conservation Area*". Nonetheless, the site is one of a number of car park sites found to the rear of the High Street and is therefore not unusual within the Conservation Area's setting. As such, it is considered to form a **low adverse** aspect of the Conservation Area's setting.

Tonbridge Castle

- 7.9 Tonbridge Castle was first scheduled on the 13th January 1915, and added to the Statutory List of Buildings of Special Architectural or Historic Interest on 8th May 1950 at Grade I.
- 7.10 The castle was first established soon after the Norman Conquest and was certainly in existence by 1088. It was originally formed Richard Fitz Gilbert (also known as Richard de Clare) to guard the crossing of the River Medway. The building has been documented a number of times and is associated with numerous nationally important historic events and individuals including royalty. The Castle is now a tourist attraction and events venue, ensuring public appreciation of the castle can be obtained.



Figure 15 View of Tonbridge Castle from within the Bailey. The Gatehouse on the right and the Motte is on the left

- 7.11 The monument is formed of a Norman motte and bailey castle with ruins of a 11th century shell keep surmounting the motte. The 60ft high motte was constructed using earth dug up to form the surrounding moat. The motte survives in much its original state bar the superficial creation of paths and ornamental planting. By the 12 or 13th century, it was crowned by a circular stone shell keep which replaced an older timber structure. The keep has been mostly lost, however, its form can still be understood through the surviving foundation walls. In addition, excavations of the motte revealed remains of other buildings located within the keep, including a possible chapel.
- 7.12 Around the bailey, fragments of the 13th century curtain wall can also still be appreciated in the north of the site and along the south of the bailey fronting the river. In the south, the curtain wall is missing its facing stones and an embankment has been created between the wall and the river. However, features such as garderobe shoots provide an understanding of the historic relationship between the castle and the river.

- 7.13 A 13th century gatehouse also survives in the north of the castle site. The structure is built of sandstone ashlar. It is square in form with a rounded tower at each of its corners. Centrally there is a wide carriage arch. The building was constructed to be highly defensible with two portcullises, putlog holes suggesting a drawbridge, square holes to pour boiling liquid, numerous arrow slits and an embattled parapet. Unusually, this sandstone structure was also historically a residency, containing a hall on the upper floor. The original fireplaces remain. The ground and first floors of the gatehouse were lost before the building was listed in 1950 but were reinstated in 1999.
- 7.14 To the east of the gate is a house built in 1793, now used as offices for the Citizen's Advice Bureau. This structure is L-shaped in plan and built using ashlar repurposed from various structures in the castle.
- 7.15 Overall, Tonbridge Castle is considered to hold a **high** level of heritage value as a result of its retained fabric, and important historic associations.

Setting

- 7.16 The castle is located on the west of the High Street to the north of the main bridge over the Medway. Historically, the castle's position on higher ground within the town would have allowed important long range views, particularly to the south. The town itself has undergone a great deal of development and expansion which has reduced these views and placed the castle in a far more urban setting in the north, south and east and a more open setting in the west formed by the river and park.
- 7.17 As such, although the setting of the castle has been greatly altered by the development of the town, the structure remains a landmark feature in the area and continues to have a clear and strong association with the River Medway and with the town's historic core. The setting is therefore considered to make a **high beneficial** contribution to the castle's significance.

Contribution of the site

- 7.18 The site is located approximately 50m to the south of the castle. Intervening built form, the river and vegetation limits the inter-relationship between most of the site and the castle. However, due to the River Walk pathway, the northernmost corner of the site can be glimpsed from the asset and clear views of the castle can be had from that part of the site, ensuring that the site does form part of the castle's urban setting. Yet, as the site is largely un-developed, its neutral appearance ensures that it is not a notable feature in views from the castle.
- 7.19 Therefore, the site in its current form is considered to be a **neutral** aspect of the Castle's setting.

8.0 Approved Scheme

- 8.1 In June 2020, a scheme to redevelop the site and the retail unit at 78c High Street was submitted under application 20/01122/FL. The proposals involved the partial demolition of the existing retail unit at no.78c High Street and the development of the car park to the rear. The development was to have comprised a 70-bedroom Hotel, 10 residential units and a retail unit fronting the High Street. The ground floor of the main building would be used for car and cycle parking facilities as well as stores for the hotel and retail unit.
- 8.2 The building was designed with a staggered massing; being three storeys at the corner of New Wharf Road and River Walk with a set-back fourth, fifth and sixth storeys above. Between the main structure and retail unit, the building would be single storey, making the two built forms appear to be visually distinct.
- 8.3 The elevations of the new structure were designed in a contemporary style with large floor to ceiling windows, a mix of brick and zinc cladding across the building and hit-and-miss brickwork at ground floor level.



Figure 16 Visualisation showing the new structure proposed in application 20/01122/FL as seen from the junction of New Wharf Road and River Walk

- 8.4 The retail building was to be retained and refurbished with a new glazed shop front inserted. A one and a half storey roof extension was to be added to the structure providing 2.no residential units, the top level of which was to be set into the mansard roof.

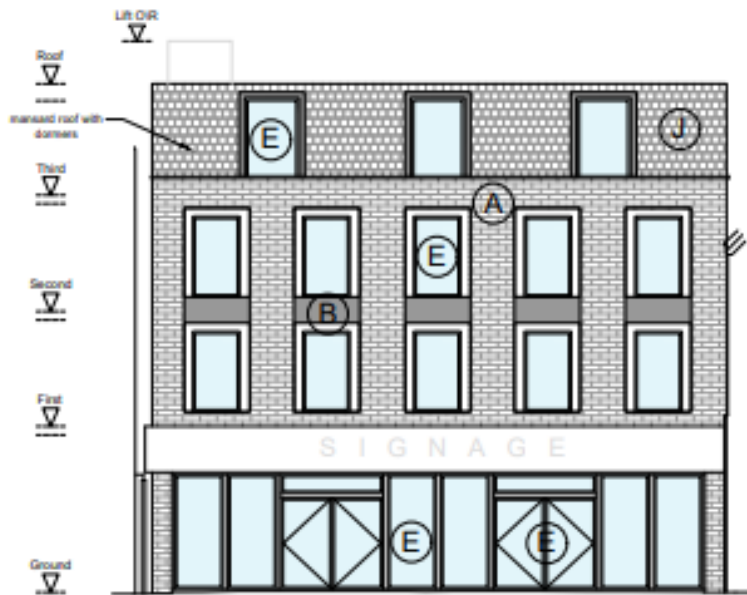


Figure 17 Proposed High Street elevation from application 20/01122/FL

- 8.5 The scheme was approved at committee on the 20th October 2020.
- 8.6 When considering the design of the proposed building, it was determined within the Officer Report that:
- “the design is considered to be of a high quality, effectively responding to the varying heights and materials of adjacent buildings across the wider townscape. It would significantly improve the existing appearance of the site”*
- 8.7 In terms of the scheme’s impact on surrounding heritage assets, the Report stated that:
- “overall the development would achieve the high standard of design that would be expected for this site, given its proximity to important heritage assets. It would make a positive contribution to the character of the area and have a neutral impact on the three identified designated heritage assets, overall preserving their special character and setting or offering slight improvements”*
- 8.8 Since the approval of this scheme, it is also relevant to consider the recent appeal decision relating to the adjacent site at 1-4 River Walk (LPA reference: 19/01108/FL). This scheme proposed the replacement of the existing building on the site with a development of 36 units in a 3.5 storey building. This would be located directly between the site and the castle.
- 8.9 In considering the impact of the proposal on the setting of the Conservation Area, the Inspector noted that *“the proposal would make a positive contribution to the street-scene in this specific location, and hence accord with the character and appearance of the area”*. In relation to the effect on the setting of the scheduled Castle, the Inspector noted that *“the building would not overwhelm or detract from the historic beauty of the castle that is appreciated by local people and tourists alike.”*

9.0 Proposed Scheme

- 9.1 The scheme seeks to demolish the existing building on site and replace them with a development of 36 retirement apartments. There will be no element of care as part of this development.
- 9.2 The replacement building will be a single footprint development and will respond to the form of the site by being L-shaped in plan responding to the irregular shape of the building plot. The elevations will be a mix of brick and zinc cladding and will be stepped in the west along New Wharf Road and north along River Walk, helping to break the building's perceived massing in these areas.
- 9.3 The accommodation will be provided over four floors and will be a mix of one and two bedroom apartments. The third floor of the building will step back from the north and western building lines and will be of a darker material palette than the lower levels of the building, helping to reduce visual impact of the top floor of the building when seen from the surrounding area.

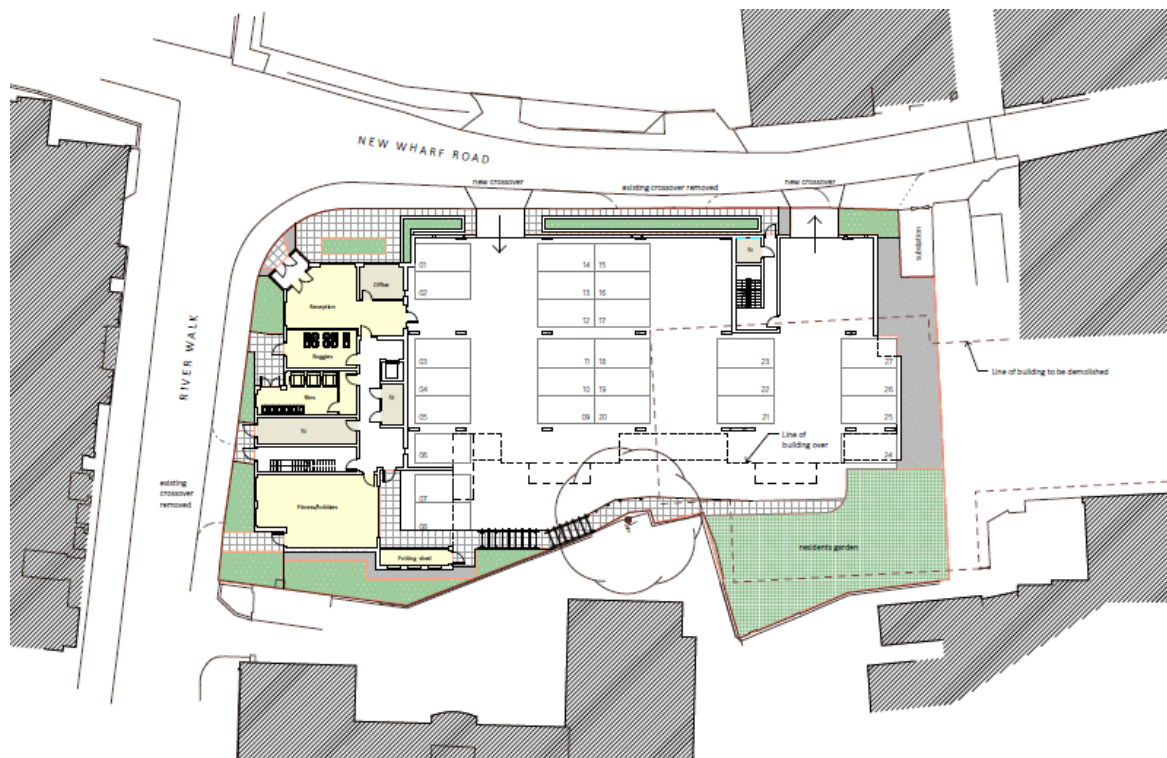


Figure 18 Proposed site plan and ground floor plan

- 9.4 The ground floor of the building will contain parking for the residents as well as a reception and office, and a recreational space. Here, the building will be detailed with hit-and-miss brickwork, screening the parking area and breaking up the elevations.



Figure 19 North elevation to New Wharf Road

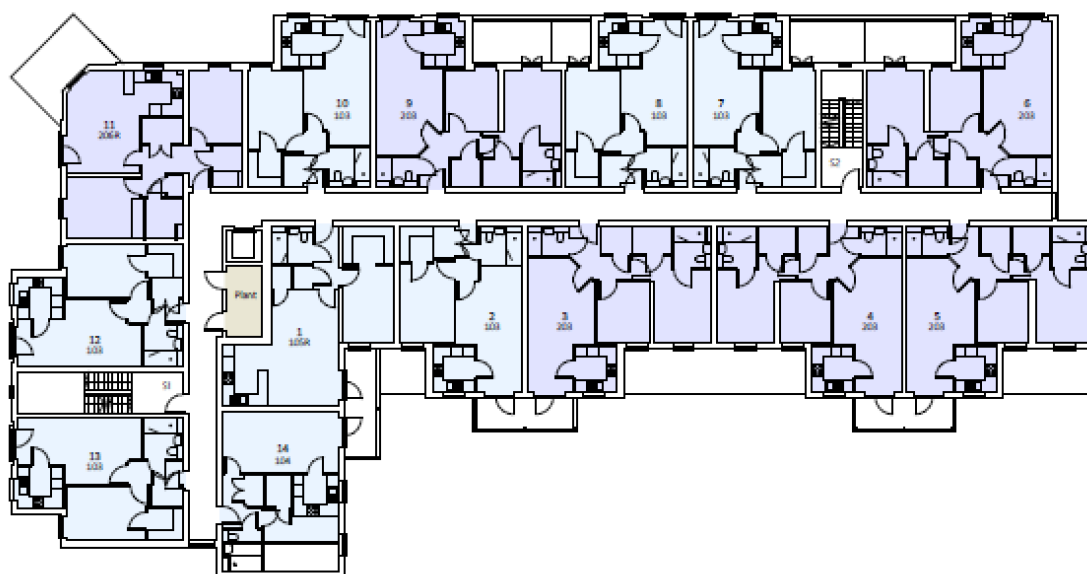


Figure 20 Proposed first floor plan



Figure 21 West elevation to River Walk

- 9.5 The north and western elevations of the building will be set back from the pavement with areas of planting created in the spaces formed. The north-western corner of the new building will contain the principal entrance to the building. This will be chamfered and set back further from the street with wider areas of planting, as well as seating, positioned either side of the door.

10.0 Impact Assessment

- 10.1 In order to assess the effect of the proposed development on the significance of heritage assets and/or their settings, it is necessary to determine the nature and extent of any impacts resulting from the proposal.
- 10.2 When assessing the impact of a proposed development on individual or groups of listed buildings, it is important to assess both the potential, direct physical impacts of the development scheme as well as the potential impacts on their settings and where effects on setting would result in harm to the significance of the asset. It is equally important to identify benefits to settings, where they result from proposals.
- 10.3 The proposed development is considered below in terms of its impact on the significance of the heritage assets, and the contribution which setting makes to their significance. Assessment of impact levels is made with reference to the table at 3.25 and satisfies ‘Step 3’ of Historic England’s GPA 3.
- 10.4 The proposals will not result in any direct physical impacts to any heritage assets. As such, the assessment of impacts is focussed on impacts to the setting of the identified heritage assets.

Impact on the setting of the Tonbridge Conservation Area

- 10.5 The site is located adjacent to the boundary of the Conservation Area, but outside the designation itself. It is currently in use as a car park and ancillary retail space and is considered to make a **low adverse** impact on the setting of the Conservation Area due to its poor quality appearance.
- 10.6 The proposal involves the clearance of the existing structure and hard standing car park on site, neither of which is deemed to be beneficial to the setting of the Conservation Area. As such, their removal is considered to be **minor beneficial** in effect.
- 10.7 The proposed new structure will provide the site with a more formal function and built form in place of its current backland character. In developing the site, the scheme will improve the view towards the High Street from the Conservation Area, with the sightlines along River Walk and New Wharf Road now being lined with the new frontage and associated landscaping instead of the existing unkempt condition. The improved appearance of the site will help to provide a visual and legible link between the Conservation Area along the river and the High Street, through making River Walk and New Wharf Road more inviting routes between the two spaces.



Figure 22 North-eastern elevation of the proposed building with the massing of the approved building outlined in pink

- 10.8 Although the mass of the proposed building will increase above that currently found on site, it will be of a lower overall height than was proposed in the approved 2020 scheme discussed in section 8 of this report. The proposed scheme has been influenced by height and massing of structures found adjacent the site, particularly the Waterside Lodge building and has been designed to be of a massing which complements rather than competes with the surrounding built form. As such, the proposed development will be consistent with the pattern of later development found in the locality and in other rear areas found within the Conservation Area's setting. This is in line with the Inspector's decision on recent application 19/01108/FL.
- 10.9 The elevations of the building have been carefully articulated and the top floor set back from the building line to reduce the perceived scale of the building. In addition, it is proposed to adopt a flat roof form for the new building, helping to keep the building's height to a level where it does not challenge the surrounding built form and the site remains part of the area to the rear of the High Street.



Figure 23 Visualisation showing the view of the proposed building from the junction of River Walk and New Wharf Road

- 10.10 Taken overall, the proposals would result in an improvement from the indistinct backland area which currently exists, replacing it with a high quality structure which has been carefully designed with reference to the scale and material palette of the surrounding area. As such, it is considered that the overall impact on the setting of the Tonbridge Conservation Area would be **minor beneficial**.

Impact on the setting of Tonbridge Castle

- 10.11 As stated in section 7 of this report, the site is located approximately 50m to the south of Tonbridge Castle and is considered to form a neutral aspect of its setting due to intervening built form and the low level form of the site in its current condition.
- 10.12 The proposed development will result in a change in southward views from the castle resulting from the increase in height. However, the proposed massing of the building will ensure that the new structure will integrate with existing built form located in this view, thereby ensuring that the proposed development will not be prominent.
- 10.13 Where there is a visual relationship between the site and the castle, at the northernmost corner of the site, the proposed new building has been carefully designed to be of a lower height with a

chamfered corner and stepped elevation beyond, reducing the perceived massing. This ensures that the proposed building will blend into the urban setting of the castle, and will not become a prominent feature in views from the castle.

- 10.14 When approaching the castle northwards along River Walk, the proposed development will sit back from the pavement edge and will be set behind landscaping. The scale of the western end of the building has been kept to a low three storey height, thereby integrating with existing built form and avoiding excessive mass in this view. These methods ensure that the new building does not project into views of the castle gained from River Walk. Instead, it will help to provide enclosure and active frontage along the street, thereby framing and directing views northwards towards the castle, helping to reinforce the asset's prominence in the area.



Figure 24 Visualisation showing the proposed building in views north along River Walk toward the river and castle. Note that the two storey building shaded white is proposed for removal and replacement by reference to application 19/01108/FL.

- 10.15 As a result, the proposals are considered to have a **neutral** impact upon the setting of Tonbridge Castle.

11.0 Conclusions

- 11.1 This Heritage Statement has been produced on behalf of McCarthy & Stone Ltd to consider the potential heritage impacts of the proposed redevelopment at New Wharf Road, Tonbridge.
- 11.2 In developing the proposals, consideration has been given to relevant national and local planning policy and guidance and the proposals have been sensitively developed to achieve a high quality and contextual design response for the site.
- 11.3 It is considered that the proposed design of the building is of a high standard, with a carefully-considered design reflective of the site's context in terms of built form and external materials. The scheme would form a marked improvement upon the existing unkempt and indistinct backland appearance of the site, forming an improvement to the setting of the Tonbridge Conservation Area. The scheme replaces extensive hard surfacing with a landscaped setting for a new residential building which takes account of its position adjacent to the Conservation Area. The design approach ensures that aspects of height are carefully controlled so as not to challenge adjoining built form. The effect on the setting of the Tonbridge Conservation Area is **minor beneficial**.
- 11.4 When considering the impact of the proposals upon the setting of Tonbridge Castle, the proposed new building will be of a form and massing which will not be overly notable in views from the castle and will instead form part of the castle's urban setting. Equally, the design and massing of the proposed building has been carefully considered in views towards the castle as well. As such, the scheme is considered to have a **neutral** impact on the setting of Tonbridge Castle.
- 11.5 In terms of the legislative context, it is evident that the scheme has evolved to take full account of the statutory assets. We therefore find that the proposals have had special regard for the desirability of preserving the architectural and historic interest, and setting, of the listed building in accordance with Section 66(1) of the Planning (Listed Building & Conservation Areas) Act 1990.
- 11.6 In addition to satisfying these provisions of the Act, and by causing no harm, the NPPF Paragraphs 193-197 and local policies are also satisfied.

APPENDIX 1

STATUTORY LIST DESCRIPTIONS



TONBRIDGE CASTLE

Overview

Heritage Category:

Listed Building

Grade:

I

List Entry Number:

1363369

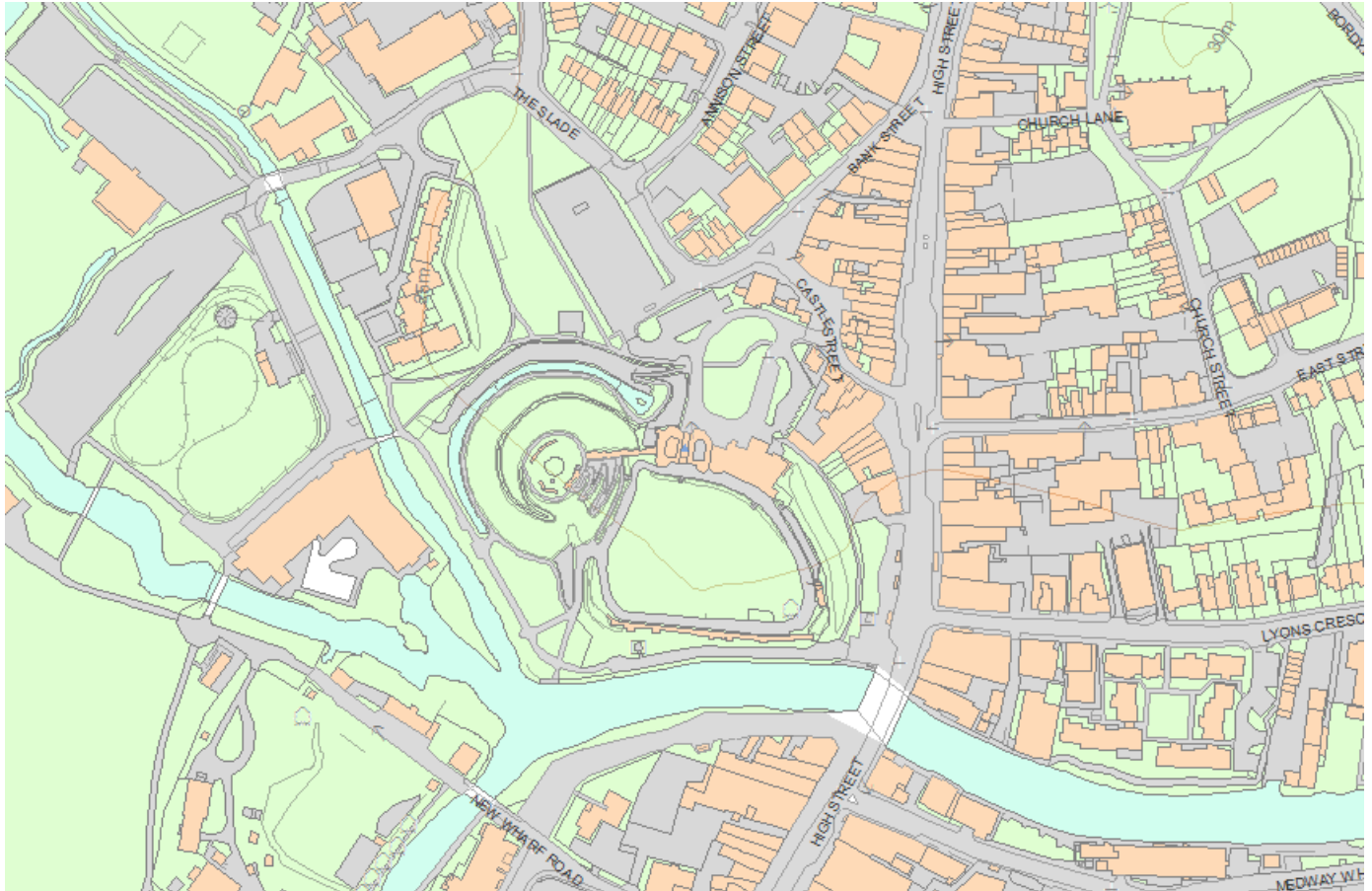
Date first listed:

08-May-1950

Statutory Address:

TONBRIDGE CASTLE

Map



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(<https://historicengland.org.uk/terms/website-terms-conditions/>).

The above map is for quick reference purposes only and may not be to scale. For a copy of the full scale map, please see the attached PDF - **1363369.pdf**

(https://mapservices.HistoricEngland.org.uk/printwebservicehle/StatutoryPrint.svc/328250/HLE_A4L_Grade|HLE_A3

The PDF will be generated from our live systems and may take a few minutes to download depending on how busy our servers are. We apologise for this delay.

This copy shows the entry on 04-Jun-2021 at 08:43:00.

Location

Statutory Address:

TONBRIDGE CASTLE

The building or site itself may lie within the boundary of more than one authority.

County:

Kent

District:

Tonbridge and Malling (District Authority)

National Grid Reference:

TQ 58974 46602

Details

Tonbridge Castle 1. 1732

TQ 5946 NW 3/1 8.5.50. TQ 5846 NE 4/1

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2. The property and offices of Tonbridge Urban District Council. Of the Norman Motte and Bailey the mound, surmounted by a few stones and containing the well, now mostly filled up. This is surrounded by the moat on the north and west sides which connects with the river Medway on the south. Of the C13 curtain wall surrounding the Keep, there survive a portion immediately to the east connecting the mound of the Keep with the Gateway, a small section to the south east of the Council Offices and a long portion on the south fronting the Medway of which the top has been made into a walk in the grounds of the Castle on account of the difference in levels to the north and south of this. Between the first section of the curtain wall mentioned above and the Council Offices is the Gate-house, built in 1230-1260. This is of sandstone ashlar and consists of a large square building with a wide carriage arch through it with 4 circular towers at its angles. High pointed arch with its head recessed in 6 grooves. Within this a lower and less pointed arch with similar head but above the latter a wall almost blocking the space between the heads of the inner and outer arches but leaving a small gap for the lowering of the portcullis with groove below. 3 square holes in the soffit of the inner arch for dropping hot liquid. Embattled parapet above building. Loop lights in flanking towers, and on ground floor of west outer tower an oblique shoot to the dungeons. Within the archway pointed doorways lead to the staircases. The rooms on first floor and hall above this occupy the whole area of the building. The floors have disappeared but the fireplaces remain. On the inner side the gateway is similar but the 2 arches are smaller with another portcullis groove between them and 3 square holes in the soffit of the outer arch. On the first floor above the arch are 3 trefoil-headed lights and on the second floor 2 larger larger pointed windows with the remains of cusping of the tracery. Loop lights in the towers, as on the outer side. To the east of the Gate-house is an L-shaped house built in 1793 and now the Council Offices. Ashlar, the stone taken from various portions of the Castle. The main front faces south. 6 windows. 3 dormers. Windows with segmental heads. Glazing bars missing in the lower half of them. Hipped dormers containing casement windows of 2 pointed lights each. Parapet. Tiled roof. On ground floor immediately adjoining the Gate-house is a large curved bay with parapet over containing 3 large windows; the centre one now converted into a door. This room is the Council Chamber. At the east end is a ground floor addition, probably a conservatory originally, made in the thickness of a further portion of the Castle walls with a parapet over. This ends in rough masonry which was part of the Castle walls. Iris addition has large sash windows with pointed heads, the lower part of one converted into a door. To the east again is part of the rampart. The interior of the building is C19 Gothic. Traces of the fosse of the Castle can be seen between Stafford Road and High Street. It then followed the course of Borden Dyke, and remains are visible between this and East Street, now dividing the gardens of the Vicarage and the Cedars, and south of East Street at the south east corner of the garden of Lyons.

Listing NGR: TQ5900346604

Legacy

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