

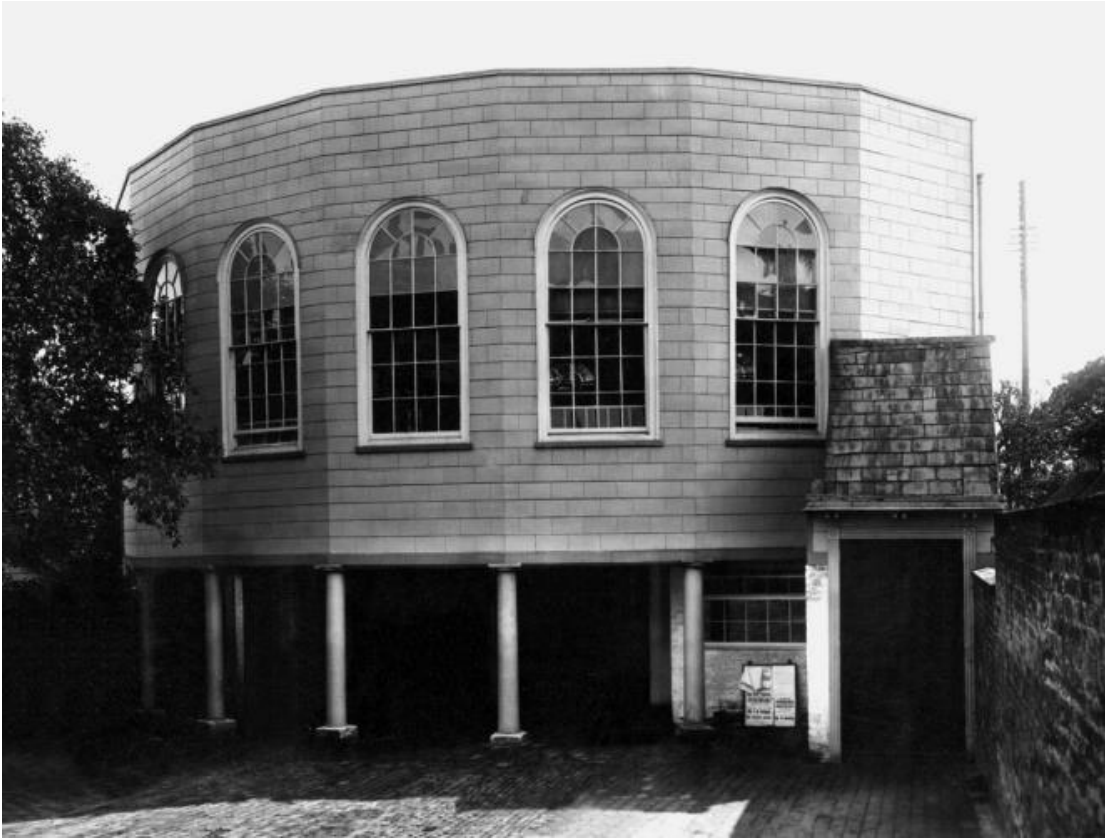


Tunbridge Wells Borough Council

# **Advisory Planning Brief for Providence Chapel, Stone Street, Cranbrook**

**May 2023**





**Photo 1: Providence Chapel, 1910**



**Photo 2: Providence Chapel November 2022**

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# 1.0 Introduction

- 1.1 Providence Chapel is a grade II\* listed building (also known as a heritage asset) and is an early 19<sup>th</sup> century non-conformist chapel located in the centre of the attractive and vibrant rural town of Cranbrook, in the eastern part of Tunbridge Wells Borough.

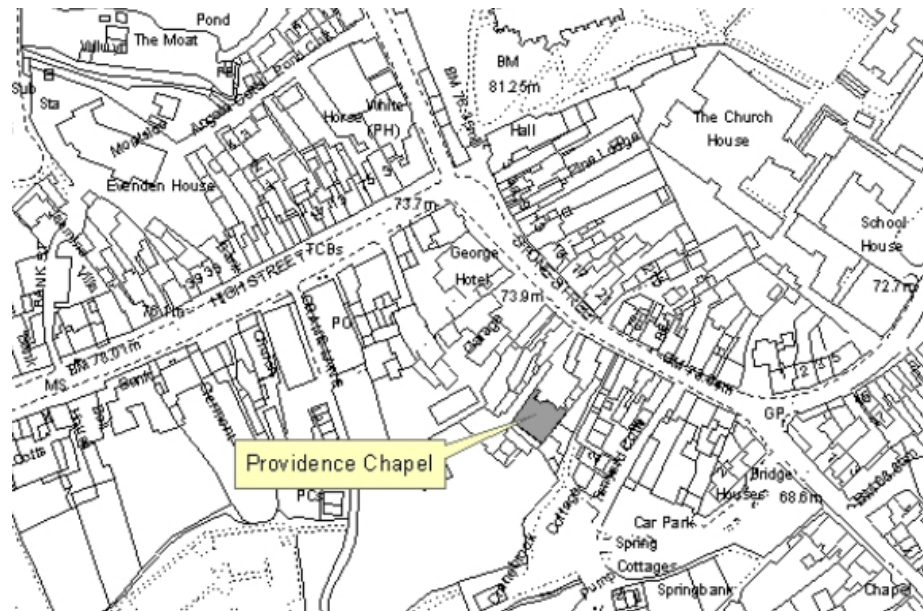


Figure 1: Site Location Plan – Stone Street, Cranbrook.

- 1.2 A site location plan showing the site access and landownership boundaries is attached at **Appendix 1**.
- 1.3 The chapel has been redundant for over 30 years (with the exception of its use for temporary book storage), is in poor condition, and has been on Historic England’s Heritage at Risk Register for many years and Tunbridge Wells Borough Council’s Listed Buildings at Risk Register since 2004. A new use is therefore required to address its conservation needs and secure its long-term sustainable future.

## Purpose of brief

- 1.4 The overall aim of this brief is to help secure a long-term sustainable use for the refurbishment of the Grade II\* listed Providence Chapel building in a way that meets the Council’s policies and standards and where possible sustains or enhances its significance and setting. This planning brief sets out the relevant planning policies and guidance that should be addressed in any future development proposal for the site. It also sets out some of the key planning and design issues and information that an applicant/owner should include in any future planning or listed building consent application.



## Status

- 1.5 This brief is an advisory document which will be a material consideration in the assessment of any pre-application proposal and/or the determination of any planning application for the future development of the site. However, it does not hold the same status as a formally adopted Supplementary Planning Document.

## 2.0 The site

### Site description

- 2.1 The site is located to the south-west of Stone Street, a primary shopping street in the centre of Cranbrook. The Chapel sits to the rear (south-west) of a number of commercial and retail properties which align this street and is accessed via a narrow lane between two of these properties.
- 2.2 There are also a number of residential properties within close proximity to the east and south of the site.
- 2.3 Parking and turning is very constrained within the confines of the site.

### Site Constraints

- Providence Chapel is a Grade II\* listed building (more detail is provided below)
- It is located within the Limits to Built Development for Cranbrook
- It lies within the Cranbrook Conservation Area (also known as a heritage asset) and the High Weald Area of Outstanding Natural Beauty
- It is included within the Primary Shopping Area
- The site is designated as having potential archaeological importance
- There is a Kent County Council (KCC) public right of way (PROW) to the east of the building which connects to Stone Street to the north
- The site is located in close proximity to a number of listed buildings to the north which front on to Stone Street and several listed cottages in The Tanyard to the south-east

## Background and detailed description of the listed building

- 2.4 The building comprises three storeys with gross internal floor areas of approximately 200sq.m at ground floor level, 200sq.m at first floor level, and 100sq.m at gallery (second floor) level. Currently the ground floor is divided up into smaller rooms including an undercroft, storage room, small kitchen, school room and toilets. The

upper floors contain the chapel. Existing floor plans of the chapel are attached at **Appendix 2**.

- 2.5 As a Grade II\* listed building, Providence Chapel is an important designated heritage asset and of more than special interest (this is based on age and rarity, aesthetic merits and national interest. See significance section at 2.12 below). The details included in the listing can be found on Historic England's website [Historic England - Providence Chapel List Entry](#).
- 2.6 The front elevation of the building has a distinctive 'canted' façade (see photo 1 above) and can be seen from Stone Street down a narrow lane between two commercial properties. On account of concerns about the stability of the roof structure, a structural engineer's report was carried out in 2005. Urgent repairs were completed to the roof covering in 2006, to make it structurally sound. The principal elevation has been scaffolded for a number of years and the building has a temporary roof to reduce the risk of water ingress (as shown in photos 2 above and 3 below). An urgent repairs notice was served in 2022 and Historic England assisted in implementing any repairs required to make the building wind and weather tight.



**Photo 3: Principal (northern) elevation 2015**

- 2.7 The most recent condition survey by Rodney Melville and Partners (2012) can be made available on request but it is recommended that any prospective applicant carry out their own independent and up to date condition survey to inform the development of proposals.

## Brief History

- 2.8 Providence Chapel was built as a meeting place for ‘Huntingtonians’, radical Calvinist followers of the preacher William Huntington, a native of Cranbrook. It is one of four non-conformist chapels in the town reflecting the popularity of more radical forms of Protestantism across the 18<sup>th</sup> and 19<sup>th</sup> centuries.
- 2.9 Until the construction of Providence Chapel in the early 19<sup>th</sup> century, Huntingtonians met either in the open air or in a warehouse owned by Isaac Beeman to the south-west of Stone Street. However, following a visit by William Huntington in 1803, plans were made to build a first-floor chapel over Beeman’s warehouse which was completed by the end of the same year.
- 2.10 The chapel was then extended firstly, by incorporating an existing vestry alongside the construction of the present roof in 1808 and then again in 1818 when it was enlarged by 12ft (3.7 metres). It took on its distinctive ‘canted’ front façade (see photo 1 above) in a final major phase of works in 1828 and the whole building was clad in timber. Two further galleries were also added at this time and the roofs were adapted and extended leading to a complex series of roof pitches which survive to this day (see roof plan at **Appendix 2**).
- 2.11 The chapel’s external and internal appearances largely date to this last phase of work though some of the chapel furnishings may be slightly earlier in date and possibly adapted when the final major phase of work was carried out (see photos below of the interior). The chapel has not been in active use as a meeting place for around 30 years.

## Significance

- 2.12 The chapel is of significance for many reasons which include the following:
- The historic and aesthetic values derived from the survival of a largely complete early 19<sup>th</sup> century chapel interior (see photos of the interior below). Largely unaltered interiors of this date from a modest vernacular building are rare and the example at Cranbrook is for this reason, of great significance
  - Its idiosyncratic ‘canted’ principal façade (photo 1 above) and simply crafted vernacular character has high architectural value
  - Historic value associated with the chapel’s connection to the preacher William Huntington who preached nationally and came to have a large following and with Isaac Beesman, a prominent local businessman
  - Evidence of the chapel’s continual enlargement over the early 19<sup>th</sup> century illustrates the growing popularity of non-conformist worship in the town and its subsequent decline across the 20<sup>th</sup> century



- Communal value associated with the importance of the chapel for many local people

2.13 The Drury McPherson Partnership Providence Chapel Statement of Significance (2013) provides the most recent statement on the building's history, development and historic significance. This can be made available on request to Tunbridge Wells Borough Council. Contact details are provided at Section 7.0 below.

### Photos of Chapel interior



Photo 4: Chapel Interior



**Photo 5: Staircases providing access to the first-floor chapel**



**Photo 6: The Pulpit**

## Relevant planning history

2.14 In recent years the owners of the Chapel have attempted to secure a new use for the building, and the following planning and listed building consent applications have been submitted:

**Figure 2: Table showing the Planning History for Providence Chapel**

<b>Year</b>	<b>Application Number</b>	<b>Proposal Description</b>	<b>Outcome</b>
2006	06/03637	Listed Building Consent for removal of pews	Refused and dismissed at appeal
2006	06/01935	Use of Providence Chapel as a concert hall	Approved
2005	05/03071	Change of use from Class D1 to D2 (assembly and leisure)	Withdrawn
2003	03/01108	Change of use for auctioneering purposes to be ancillary to existing uses	Refused

2002	02/02731	Listed Building Consent for removal of pews	Refused
2000	00/02492 (full application and 00/2494 (Listed Building Consent application))	Change of use to include Class D2 (assembly and leisure) and Class A3 (food and drink) and Listed Building Consent for internal alterations	Both refused
2000	00/00285	Change of use from chapel to storage of books	Approved
1996	96/01184 (full application) and 96/01883 (Listed Building Consent application)	Change of use of former chapel with ancillary facilities to provide coffee house and licenced restaurant	Both withdrawn

## 3.0 Planning Policy Context

3.1 The following sub-sections identify the national and local planning context and the key policies relevant to any future development of the Providence Chapel site. However, it should be noted that national and local planning policy may be subject to change, and any applications will be determined in the light of the adopted planning policies/guidance at the time a decision on any application is made. In addition, the list of local planning policies is not exhaustive, and any future development of the site should comply with all policies relevant to the particular proposal for the building/site at the time an application is determined, or provide clear justification for any departure from these policies.

### National Planning Context

#### The National Planning Policy Framework (NPPF)

3.2 Government Planning Policy is set out in the NPPF, the first version having been published in March 2012, the latest version in July 2021 [National Planning Policy Framework July 2021](#). Section 16 provides guidance on conserving and enhancing the historic environment, and paragraph 197, which is of particular relevance, states:

*‘In determining applications, local planning authorities should take account of:*

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*

*c) the desirability of new development making a positive contribution to local character and distinctiveness'*

- 3.3 While paragraphs 199 to 202 consider the impacts of development proposals in relation to heritage assets and the relative levels of potential harm:

*Paragraph 199 States:*

*“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.”*

- 3.4 In relation to Providence Chapel, as a grade II\* listed building, it is considered that for any future scheme, any harm to the significance of the building should be avoided or minimised. For any proposal that would result in substantial harm, the following advice in paragraph 203(b) of the NPPF applies:

*“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*

*(b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”*

- 3.5 The Government has recently carried out a consultation on proposed changes to the NPPF, but these do not include changes to Section 16.

## National Planning Practice Guidance (PPG)

- 3.6 [Planning Policy Guidance - Historic Environment](#) provides further advice and guidance on decision making relating to heritage assets, including advice on the importance of the significance and impact on the setting of a heritage asset, and determining the optimum viable use for a heritage asset in the assessment of planning proposals.

## Local Planning Context

### The existing Development Plan

- 3.7 The Development Plan for the borough currently comprises three documents which should be read in conjunction with each other: the ‘saved’ Tunbridge Wells Borough Local Plan 2006 policies, the Tunbridge Wells Borough Core Strategy 2010, and the Tunbridge Wells Site Allocations Local Plan 2016:

## Tunbridge Wells Borough Local Plan 2006

- 3.8 The [Tunbridge Wells Local Plan 2006](#) provides local planning policies which account for both change and conservation in the borough. However, since its adoption some changes have been made as a result of the 'saving' of policies in March 2009, the adoption of the Core Strategy in June 2010, the adoption of the Site Allocations Local Plan in July 2016, as well as changes to national policy. Therefore, some policies which are no longer saved have been deleted.
- 3.9 Key 'saved' 2006 Local Plan policies relevant to any future development of the Providence Chapel site are:
- EN1 – Design and other development control criteria
  - EN5 – Development in Conservation Areas
  - EN10 – Sites of Archaeological Interest
  - CS6 – Provision of Community Buildings
  - TP4 – Access to the road network
  - TP5 – Vehicle parking standards

## Core Strategy 2010

- 3.10 The [Tunbridge Wells Core Strategy](#) was adopted by the Council in June 2010. The Core Strategy sets out the spatial vision for the borough to 2026, identifying the level of new growth required and the locations where growth is proposed to take place.
- 3.11 Key Core Policies relevant to any future development of the Providence Chapel site are:
- Core Policy 4 – Environment
  - Core Policy 5 - Sustainable Design and Construction
  - Core Policy 8 - Retail, Leisure and Community Facilities Provision
  - Core Policy 14 - Development in the Villages and Rural Areas

## Tunbridge Wells Site Allocations Local Plan 2016

- 3.12 The main purpose of the [Tunbridge Wells Site Allocations Local Plan](#) is to allocate specific land for housing, employment, retail, and other land uses to meet the identified needs of the communities within Tunbridge Wells borough to 2026 and beyond, following the strategic and sustainable development objectives set out within the adopted Core Strategy (2010) above. There are no specific site allocation policies in this Plan which are directly related to the Providence Chapel site.



# The new Tunbridge Wells Local Plan

## Introduction

- 3.13 The Council is producing a new Local Plan which is in its final stages of preparation and currently subject to Examination. The [Submission Local Plan](#) (SLP) was submitted to the Secretary of State for examination by an independent Inspector on 1 November 2021 and was then subject to a number of Examination in Public hearings which took place between 1 March and 15 July 2022. The Council received a letter setting out the Inspector's initial findings following the hearing sessions in early November 2022. The Council is currently considering the issues raised and the suggested ways forward set out in this initial findings letter. The timetable for adoption is therefore delayed and the plan will not be adopted in early 2023 as set out in the current Local Plan timetable and the Councils Local development Scheme (LDS). The Council will update the Local Plan timetable and LDS in due course. Anyone wishing to seek updates on the new Local Plan and the examination should refer to the Council's [examination webpages](#).
- 3.14 The Submission Local Plan sets out the Council's proposed strategic objectives, and overarching development strategy for the borough and the planning policy framework necessary to deliver them. It covers the period between 2020 and 2038. Once adopted, it will replace the 'saved' policies of the Tunbridge Wells Borough Local Plan 2006, the Tunbridge Wells Borough Core Strategy 2010, and the Site Allocations Local Plan 2016 above. It is the outcome of an extensive process, including public consultations and dialogue with key stakeholders, as well as the assimilation of substantial work undertaken to provide a robust evidence base.

## Previous Stages

- 3.15 The preparation of the SLP follows from the production and public consultation of three earlier documents, as set out below:
- Tunbridge Wells Borough [Issues and Options](#) published and consulted upon in 2017
  - Tunbridge Wells [Draft Local Plan](#) (Regulation 18) published and consulted upon in 2019
  - Tunbridge Wells [Pre-Submission Local Plan](#) (Regulation 19) published and consulted upon in March to June 2021
  - Tunbridge Wells [Submission Local Plan](#) submitted to the Secretary of State for examination by an independent Inspector on 1 November 2021 and then subject to a number of Examination in Public hearings between 1 March and 15 July 2022.

## Relevant Policies

- 3.16 Key Submission Plan Policies relevant to any future development of the Providence Chapel site are:

Strategic Policies (Section 4 of the SLP):

STR8: Conserving and Enhancing the Natural, Built and Historic environment

Place Shaping Policies (Section 5 of the SLP):

STR/CRS 1: The Strategy for Cranbrook and Sissinghurst parish

Development Management Policies (Section 6 of the SLP):

EN1: Sustainable Design

EN4: Historic Environment

EN5: Heritage Assets

EN19: The High Weald Area of Outstanding Natural Beauty (AONB)

ED12: Retention of Local Services and Facilities

TP2: Transport Design and Accessibility

TP3: Parking Standards

## Weight to be attached to the Submission Local Plan

3.17 The level of “weight” that can be attached to the policies in the emerging Local Plan varies from policy to policy. However, paragraph 48 of the NPPF states that decision-makers may give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight that may be given);
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- the degree of consistency of the relevant policies in the emerging plan to the policies in the NPPF (the closer the policies in the emerging plan are to it, the greater the weight that may be given).

3.18 While there may be some variation on individual policies based on their level of consistency with existing local and national policies, the Examination is currently ongoing and will be subject to further consultation in the future which may include policy modifications. Therefore, at present it is likely that generally, only limited weight can be attached to the above Submission Local Plan policies in the assessment of planning applications. Weight to be attached to these policies is likely to change as the Examination progresses.

3.19 It should be noted that the list of all planning policies above (for each Plan) is not exhaustive and depending on the nature of the proposed change of use for the building, other policies may also be applicable.

## Neighbourhood Development Plans

- 3.20 Neighbourhood Development Plans (NDPs) were introduced under the Localism Act 2011 above, to allow plan and decision making to be carried out at a more local level. NDPs need to conform with national policy, local adopted plans and other legal requirements. These plans can be used to develop a shared local vision. TWBC has been working with the parish and town councils in the borough to progress their NDPs.
- 3.21 The [Submission version of the Cranbrook and Sissinghurst Neighbourhood Plan \(July 2022\)](#) was subject to public consultation under Regulation 16 (from 12 September to 14 November 2022). This Plan includes the following policy relating to Providence Chapel as an important local heritage asset:

### **“ Policy HD4.8**

#### ***Retention & Restoration of The Providence Chapel***

- a) The Providence Chapel should be restored and revitalised so that it becomes an integral part of the life of the town.*
- b) Proposals will be considered that secure the optimum viable use of the chapel, in line with the NPPF/NPPG.*

#### *Policy Supporting Text*

*4.31 The Providence Chapel is in a central location in Cranbrook. It is an important historic building, listed Grade II\* because of its significance as a very good example of an early 19th century non-conformist chapel, which retains almost all of its original liturgical fittings. The Chapel, and preachers associated with it such as Isaac Beeman and William Huntington, played a significant part in Cranbrook’s history as a ‘Dissenting’ area, where many non-conformist sects have flourished. The Chapel is a landmark within the town centre and attracts tourist attention.*

*4.32 There is significant support to restore this iconic building. The Providence Chapel is listed on the 2020 ‘Heritage at Risk South East’ register compiled by Historic England. Its condition is described as ‘very bad’ which threatens its historic character and detracts from the aesthetic appearance of the historic town centre. The dilapidated condition of the Providence Chapel has also been highlighted in CCAA 2010 and warrants immediate attention.”*

- 3.22 The Cranbrook and Sissinghurst NDP is currently subject to examination by an appointed Independent Examiner. The Examiner has read all the examination documentation and carried out site visits to the parish and the final report from the Independent Examiner is awaited. Subject to the outcomes of this, any required changes and subsequent agreement by TWBC’s Cabinet Members, it is anticipated that a public referendum for this NDP will take place in September 2023. Should a favourable outcome be reached, then the NDP will be ‘made’ upon its adoption. Policies of the NDP would carry full weight following a favourable referendum (that is

more than 50% of voters voting in favour of the NDP). The latest information can be found on the Council's [Cranbrook and Sissinghurst NDP webpage](#).

- 3.23 Details of all Neighbourhood Plans within the borough can be found on the Council's website under [Neighbourhood Plans](#) and further information on the relationship between the Local Plan and neighbourhood plans is set out in Section 4 of the TWBC Submission Local Plan (above) at Policy STR 10: Neighbourhood Plans.

## Other Statutory Considerations and guidance documents

### Planning and Compulsory Purchase Act 2004

- 3.24 The Council makes planning decisions in the borough in line with Section 38(6) of the [Planning and Compulsory Purchase Act 2004](#), which states that determination of applications under the planning acts must be made in accordance with the development plan unless material considerations indicate otherwise.

### Planning (Listed Buildings and Conservation Areas) Act 1990

- 3.25 The Council will also have regard to the [Planning \(Listed Buildings and Conservation Areas\) Act 1990](#) with Sections 66 and 72 being of particular relevance.

### Town and Country Planning Use Classes Order (amended September 2020)

- 3.26 Town and Country Planning Use Classes Order (amended 1 September 2020) see: [Planning Portal - Use Classes Order](#). This should be used for reference when looking at possible uses for the building under section 4 below.

#### Supplementary Planning Documents (SPDs) and other guidance:

- Tunbridge Wells Cranbrook Conservation Area Appraisal June 2010 - [Cranbrook Conservation Area Appraisal](#)
- Tunbridge Wells Local Heritage Assets SPD June 2012 - [Local Heritage Assets SPD](#)
- Tunbridge Wells Historic Environment Review Part One January 2018 [Historic Environment Review Part One](#)
- High Weald AONB Management Plan 2019 – 2024 (under review) [High Weald AONB Management Plan](#)
- Historic England Advisory Note 16 – Listed Building Consent – [Historic England Advisory Note 16](#)

- Historic England Good Practice Advice in Planning - [Managing Significance in Decision-Taking in the Historic Environment \(March 2015\)](#)
- Historic England Technical Conservation and Guidance Research Brochure November 2020 - [Historic England technical conservation guidance and research brochure](#)

## 4.0 Key Matters for Consideration

### Principle of development

- 4.1 As the building is grade II\* listed, the aim of development should be to secure its long-term beneficial use in the least harmful way.
- 4.2 The site is located in the Limits to Built Development of Cranbrook where the change of use of an existing building is normally considered to be acceptable in principle. This would be dependent on the type and nature of the use proposed and would be subject to all relevant material planning considerations, including the impact of any proposal on the character and setting of this highly graded listed building, nearby listed buildings, Conservation Area and AONB, and other issues mentioned below, being satisfactorily addressed.

### Heritage and design

#### Conservation requirements

- 4.3 As mentioned above, as a Grade II\* listed building, Providence Chapel is an important designated heritage asset and of more than special interest.
- 4.4 This brief seeks to ensure that any future development proposal delivers a secure long-term sustainable use for the building.
- 4.5 A range of alternative uses may be deliverable within the building (as set out in the potential future uses section below). The key objective for future proposals should be to sustain an understanding and appreciation of the largely unaltered first floor chapel interior and the contribution that this makes to the building's overall significance.
- 4.6 Clear and convincing justification will be required for any proposal which harms the heritage significance of the building and applicants would need to show that the proposal cannot be delivered in a less harmful way or that the harm cannot be avoided altogether.
- 4.7 Any future development proposal should be accompanied by a heritage statement (a heritage statement is an assessment of the significance of heritage assets and/or their



settings affected by a development, and of the impacts of that development upon them), that sets out how the proposal minimises harm to heritage significance and provides justification for any remaining harm.

- 4.8 As well as any national policy requirements, any future development proposal must clearly take account of the key conservation and design policy requirements including the Council's Development Management policies for heritage assets (Policy CP4 of the Core Strategy 2010 and policies STR8, EN4 and EN5 of the Submission Local Plan) listed above, the Cranbrook Conservation Area Appraisal, and any policy requirements set out in the Cranbrook and Sissinghurst Neighbourhood Plan should it receive a favourable outcome at its referendum (full weight can be attached to relevant policies at this stage prior to the NDP being 'made' on its adoption).

### Consideration of specific building features

- 4.9 The building's principal first floor canted façade (photo 1 above) remains largely as constructed in 1828 though the sash windows and weatherboarding are likely to be of a later date. The Council would strongly discourage any major alterations to the weather boarded canted façade or flank or rear elevations unless clear and convincing justification can be provided.
- 4.10 Internally, the chapel's furnishings are a rare survival from the early 19<sup>th</sup> century and make an important contribution to the building's significance (see the floor plan at **Appendix 2** and photos of the interior above). Their complete removal would cause a very high, possibly substantial, level of harm to the building's significance and is strongly discouraged. Solutions for the chapel interior should seek to sustain key furnishings including the pulpit and pews.
- 4.11 Based on this principle, this brief seeks to retain a number of the chapel's furnishings and features of significance. The list below is not exhaustive and additional items may be required when full planning and listed building applications are submitted:
- Pulpit (photo 5)
  - Box pews (photo 3)
  - Important pews (photo 3)
  - Raked seating or a large representative example of the most significant surviving raked seating
  - Original materials and finishes
  - Coat hooks and other incidental joinery features such as dado rails from the early 19<sup>th</sup> century which help explain how the chapel was simply decorated and used
- 4.12 However, if change is unavoidable to deliver a long-term sustainable use, the following options would be considered provided that the harm arising is shown to be minimised and justified:
- limited removal of chapel seating, subject to the detailing and/or
  - the introduction of wheel mountings to pews to create flexible spaces on a temporary basis
  - the removal of the later baptistry

- further enclosure of spaces under the galleries and the loss of seating in these spaces
- the removal and replacement of existing vestry walling under the west gallery, which is 20<sup>th</sup> century in date

4.13 The Council also advises that, as a principle, furnishings which make the greatest contribution to the significance of the chapel should be protected. If features are deemed redundant for a proposed new use, then they should remain legible and must be retained unless expressly agreed in writing with the Council via a listed building consent application.

4.14 In contrast to the first-floor chapel, the ground floor (see floor plan at **Appendix 2**) is capable of accommodating a much greater level of alteration without causing a high level of harm to heritage significance and the following would be considered possible, providing the harm is shown to be minimised and justified:

- Substantial internal alterations providing that the historic timber structural frame remains intact
- Enclosure of the undercroft to increase the footprint of the building (subject to detailing)

### **Means of access, fire protection and means of escape**

4.15 It is recognised that step free access may be desirable depending on the proposed future use of the building, especially if a proposed use incorporates public access to the first-floor chapel. Options for a lift would therefore be considered subject to the impact this may have on first floor features which make an important contribution to the significance of the building.

4.16 Depending on the proposed use, enhancements to meet fire regulations, including an adequate means of escape will apply. Solutions should seek to address these requirements without the need for major alterations unless this is unavoidable, particularly in weighing any potential harm against public benefit.

### **Other works**

4.17 Details of any other works required to the building should also be submitted with any future planning and/or listed building consent application including insulation and heating, servicing and repairs and these should avoid, or where this is not possible, minimise any potential harm to the character and fabric of the listed building.

### **Archaeology**

4.18 The site is designated as having potential archaeological importance. In accordance with 2006 Policy EN10: Sites of Archaeological Interest and SLP Policy EN5: Heritage Assets, in considering any development proposals that may affect an archaeological site, applicants are advised to consult both the Local Planning Authority and the County Archaeologist at Kent County Council (see contact list below) at an early stage, ideally prior to submitting a formal planning application, in order to establish the possible archaeological implications of any proposals. Developers will need to demonstrate that the archaeological implications of the development have been

properly assessed, and a detailed written archaeological assessment may be required to be submitted with an application for development.

## Potential future uses

### Existing use

- 4.19 The building's existing use can be defined as a place of worship (now Class F1(f) of the Town and Country Planning Use Classes Order - see Use Classes Order at 3.26 above). However, the building has been vacant for a number of years.

### Future ambition

- 4.20 The Council is eager to secure a viable use for this special building to enable its maintenance and conservation in the long term and to avoid its continued deterioration.
- 4.21 This site offers a substantial opportunity to refurbish and breathe new life into an important heritage asset, which is valued by local residents; whilst also creating an opportunity for a new use which will benefit the wider setting of the listed building in the Conservation Area and AONB, in the heart of Cranbrook.

### Optimum viable use

- 4.22 The definition of optimum viable use is set out in the National Planning Practice Guidance (NPPG), Paragraph 015. The guidance advises that:

*'if there is only one viable use, that use is the optimum viable use. If there is a range of alternative economically viable uses, the optimum viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most economically viable one.'*

- 4.23 The guidance goes on to advise that harmful development may be justified in some instances, in the interests of realising the optimum viable use of an asset, notwithstanding the loss of significance caused, and providing the harm is minimised. For proposals which cause less than substantial harm to the significance of designated heritage, securing the optimum viable use of the asset is a public benefit which applies to the weighing exercise of harm and benefit (NPPF Paragraph 202).
- 4.24 Paragraphs 199 to 204 of the [National Planning Policy Framework July 2021](#) set out the relevant policy stance in addressing substantial and less than substantial harm.

## Potential future uses

- 4.25 The most sympathetic uses for the building are likely to be uses which retain the key fixtures and fittings from the first floor chapel (as described in the **Specific building features** section above) which make the greatest contribution to the building's significance.
- 4.26 In practice, a community use, in some form, is likely to be the most sympathetic to the building's significance because it should be possible to retain large parts of the chapel interior with the sorts of uses described below. A community use also delivers public access and would be of wider public benefit, and is considered an ideal use because of the building's sustainable location in the centre of the attractive rural town of Cranbrook, close to a primary shopping street.
- 4.27 The Council therefore considers that if it can no longer be retained as a place of worship (Class F1(f), then an alternative community use would be welcomed such as that falling under Use Class F2(b) – as a hall or meeting place for the principal use of the local community, or F1(d) – a community reading room, an art gallery under F1(b), including use of the listed pews to display art works.
- 4.28 The use of the building as a concert hall (Sui generis use), as previously approved, could also be considered as a possible alternative. Generally, planning permission is not needed when the existing and proposed uses fall within the same Use Class, such as the aforementioned uses under Class F (see Use Classes Order at 3.26 above). However, depending on any alterations associated with the proposed change of use, planning permission, and listed building consent, may be required.
- 4.29 Other possible uses could include a small commercial enterprise such as an office use under Class E (g)(i) (e.g. offices to carry out any operational or administrative function). Other commercial/retail uses, such as a restaurant/café (where the existing pews may be used and reconfigured in parts of the chapel to use as table seating); or a mix of uses (perhaps a different use at different levels as there are two separate access points/stairs to the first floor), which would create local employment opportunities would also be considered. Such uses should be possible to implement without resulting in high levels of harm to the building, and are therefore desirable. These uses would also be subject to the level of activity associated with any such use in terms of servicing and deliveries etc. and the impact this would have on highway safety given the narrow access to the site; as well as any impact fume extraction/other servicing equipment would have on the character and fabric of the building; and impact on residential amenity.
- 4.30 Where a proposal would result in the loss of the chapel as a community facility, it would need to be justified in line with the requirements of policies CS6 of the 2006 Local Plan, Core Policy 8 of the Core Strategy 2010 and proposed Policy ED12 of the Submission Local Plan 2021 above. This would normally involve demonstrating that the property has been subject to an appropriate marketing exercise to establish whether there has been any interest in the property for such a community use.
- 4.31 Such marketing information would also assist in the justification for a proposed scheme where it is considered to result in substantial harm (see paragraph 201 of the NPPF), as well as identifying where there is a market/demand for a particular use in establishing an optimum viable use for the building. It will be for the applicant to

determine which use is the optimum viable use of the building. The Council would be happy to provide further guidance on this, as part of any pre-application discussions.

## Residential Use

- 4.32 It is considered that the building would not lend itself to full residential conversion, given the potential for very high levels of harm to the significance of the building arising from the likely extent of alterations to the building's most significant spaces in the first-floor chapel. It is considered that a full residential conversion could cause substantial harm to the significance of the grade II\* listed building. Substantial harm can only be allowed in wholly exceptional cases and only after a set of tests are met (described at paragraph 3.4 above). The ambition for Providence Chapel is therefore to avoid such a high level of harm if at all possible.
- 4.33 However, as mentioned above, the ground floor (see floor plan at **Appendix 2**) is capable of accommodating a much greater level of alteration without causing a high level of harm to heritage significance. Providing the harm is shown to be minimised and justified, it may be possible to convert this floor to a residential unit or maybe a live/work unit such as an artist studio with residential accommodation on the ground floor and studio/gallery in the chapel area above.
- 4.34 It should be noted that the above uses have been put forward as suggestions for consideration purposes only and would need to be considered in further detail at the pre-application stage and upon the submission of details for any proposed change of use/works.

## Other factors to consider

- 4.35 As well as any impact on the fabric, character and setting of the listed building, any change of use would also need to be considered in relation to other factors set out below such as residential amenity, sustainable design, and transport/highway safety.

## Residential Amenity

- 4.36 There are existing residential properties within very close proximity to the site such as The Carriage House and The Barn to the south, Crane Brook Cottage, and 1 and 2 Tanyard Cottages to the south-east.
- 4.37 In accordance with Policy EN1: Design and other development control criteria of the 2006 Local Plan and proposed Policy EN1: Sustainable Design of the Submission Local above, the proposal should not cause significant harm to the amenities of the occupiers of neighbouring properties and uses in terms of excessive noise, vibration, odour, air pollution, activity, vehicular movements, or overlooking.
- 4.38 Depending on the nature of any proposed use, this may be assessed by the Council's Environmental Protection team, for example in relation to noise levels, and the hours of operation may need to be restricted by way of planning condition. In addition,



should any mitigation measures be required resulting in any physical changes to the building, again, the impact of any such measures on the fabric and character of the listed building would need to be carefully considered.

## Transport/Highway Safety

- 4.39 In accordance with Policy TP5: Vehicle parking standards of the 2006 Local Plan and proposed Policy TP3: Parking Standards of the Submission Local Plan above, vehicular access, on-site parking provision, and pedestrian movement should be safely accommodated for development proposals.
- 4.40 The vehicular access to the site is narrow and the area for any on-site parking and turning is very restricted. This may have highway safety implications in relation to servicing and deliveries for any proposed commercial use, especially if it would result in congestion on Stone Street. The level of such activity would therefore need to be considered as part of any future proposal in consultation with KCC Highways. However, in terms of general use and for users of the building, as mentioned above, the site is in a sustainable town centre location, with both bus stops and public car parking facilities within reasonable walking distance.
- 4.41 Further details of access and parking would need to be addressed in the Design and Access Statement submitted with any future planning application.

## Landscape

- 4.42 The site is located in the High Weald AONB which has a high status of protection in relation to landscape and scenic beauty; and in accordance with Core Policy 4: Environment and SLP Policy EN19: The High Weald Area of Outstanding Natural Beauty (AONB), proposals should seek to conserve and enhance its landscape and scenic beauty, having particular regard to the impacts on its character components, as set out in the High Weald AONB Management Plan.
- 4.43 It is noted that the building is located in the built-up area of Cranbrook and is seen amongst and partially screened by other buildings when viewed from nearby public vantage points, but any future proposals should seek to undertake sympathetic improvements to the listed building to improve its appearance, character and setting within the AONB.

## Sustainable Design

- 4.44 Although the building is Grade II\* listed, any future proposals should, where possible, include measures and elements of sustainable design to minimise its carbon footprint in line with 2006 Policy EN1: Design and other development control criteria, Core

Policy 5: Sustainable Design and Construction and SLP Policy EN1: Sustainable Design, as much as possible, including:

- Measures to improve energy and water efficiency
- The use of sustainably resourced materials: and
- The implementation of infrastructure that meets the needs of modern communication and technologies (such as broadband provision via fibre to the premises)

without causing harm to the character and fabric of the building.

## 5.0 Community Engagement

- 5.1 In line with Policy EN1 of the Submission Local Plan 2021 and the Council's [Statement of Community Involvement](#), the Council encourages that new development should be informed by effective engagement between applicants, communities, neighbours of sites, local planning authorities, infrastructure providers, and other interested parties throughout the planning process. Ultimately it will be for an applicant to decide in what ways they wish to undertake such consultation.

## 6.0 Next Steps

### Pre-application advice

- 6.1 The Council is available to offer advice and would welcome the chance to discuss possible options for this site. Therefore, given the high status of the listed building, before submitting a formal application for planning permission and/or listed building consent, it is advisable to contact the Council for informal [Pre-application advice](#), which will include consultation with specialist officers (such as the Council's Conservation Officer and Historic England).

### Submitting a formal planning/listed building consent application

- 6.2 Given the deteriorating state of the building, the consideration of any full and/or listed building consent application submitted will be given high priority.
- 6.3 Details of the information (forms, plans/drawings and other supporting information) which should be submitted with any future planning and/or listed building consent for the site can be found on the Council's website: [Validation checklist](#)

## Additional information needed:

- 6.4 The following information would also need to be submitted with any future planning application (PA) and/or listed building consent application (LBCA):
- Heritage statement (with LBCA)
  - Design and Access Statement (with PA). Further details can be found on the Council's website: [Making a Planning Application](#) (scroll down to the bottom of this webpage to find further advice on Design and Access and Heritage Statements)
  - Details of any additional works required e.g., insulation and access improvements (with PA and LBCA)
  - Archaeological Assessment (dependent on KCC advice) (with PA)
  - A structural survey may be required depending on the works proposed and to establish how they will affect the structural integrity of the building (with LBC A))
  - Marketing information where applicable (as mentioned at paragraphs 4.30 and 4.31 above) (PA and LBCA)
  - Viability report to demonstrate that the proposal will provide appropriate long term viability for the upkeep and maintenance of the building. For example that any proposed commercial use will generate enough money to ensure the building is maintained. The report should also include details of how any initial repair/development work will be funded (LBCA)

## Building Regulations

- 6.5 Building Regulations approval may also be required for any works, including structural works and servicing for the building. It is therefore advisable to contact the Council's [Building Control](#) team to enquire about any Building Regulation requirements. The impact of any such requirements on the fabric and character of the listed building would also need to be carefully considered.

# 7.0 Relevant Contacts

### Tunbridge Wells Borough Council:

Email: [planning@tunbridgewells.gov.uk](mailto:planning@tunbridgewells.gov.uk)

Telephone: 01892 526121 (Town Hall); 01892 554604 (Planning Support); 01892 554056 (Planning Policy)

As mentioned above, the following documents can be made available on request to TWBC:

- The most recent condition survey by Rodney Melville and Partners (2012)

- The Drury McPherson Partnership Providence Chapel Statement of Significance (2013)

**Kent County Council:**

For **archaeological** advice, contact the Heritage and Conservation team:

Email: [heritage@kent.gov.uk](mailto:heritage@kent.gov.uk)

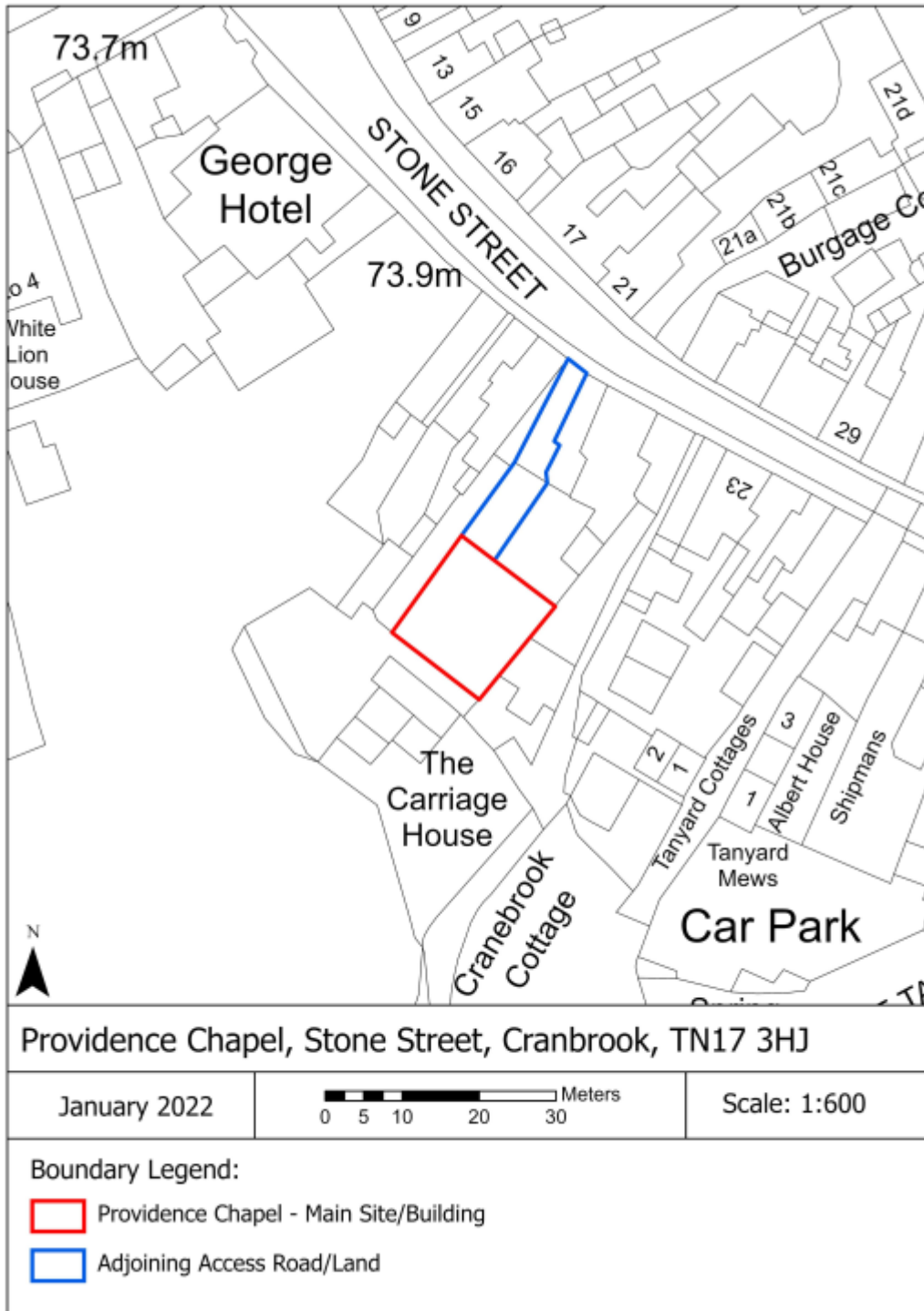
# Appendices

Appendix 1 – Site Location Plan

Appendix 2 – Existing Floor Plans

# Appendix 1 – Site location plan

(showing access and extent of site ownership)

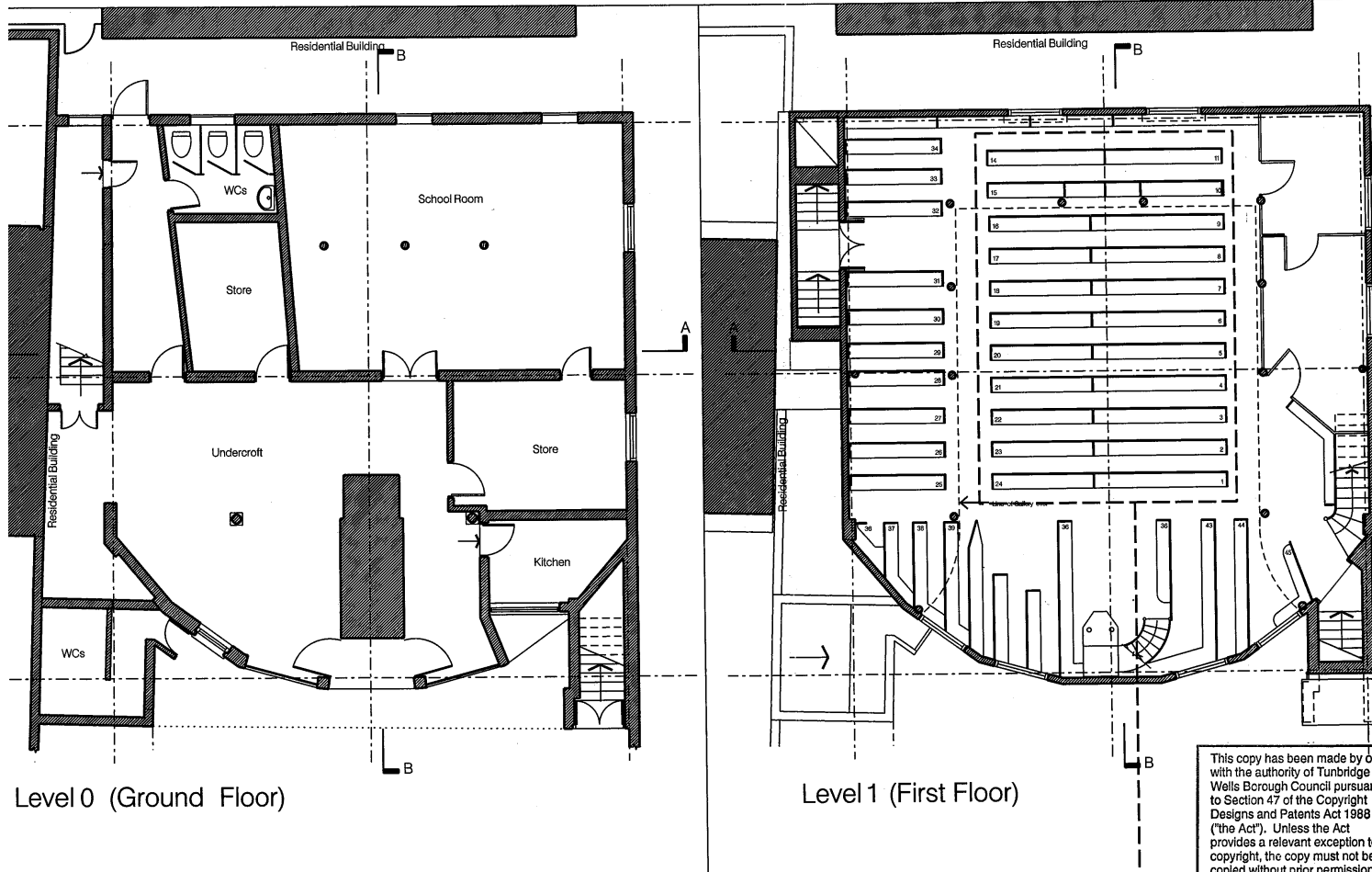




# Appendix 2 - Providence Chapel – existing floor plans

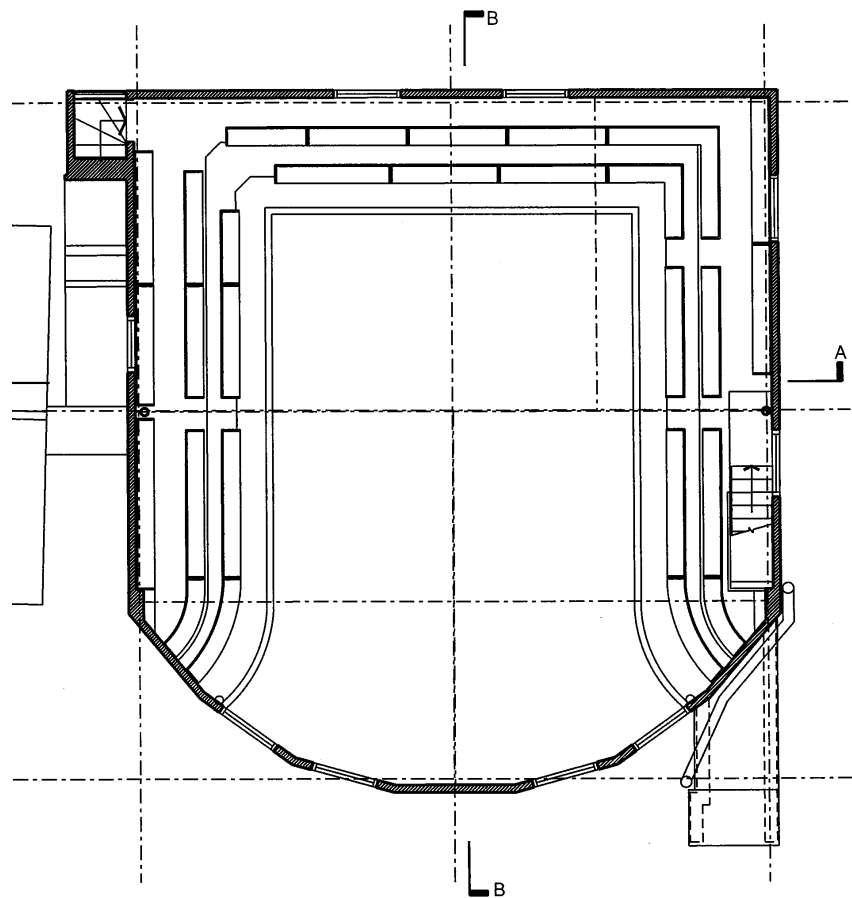
Ground Floor – undercroft, storage, school room, kitchen, WCs

First Floor - Chapel



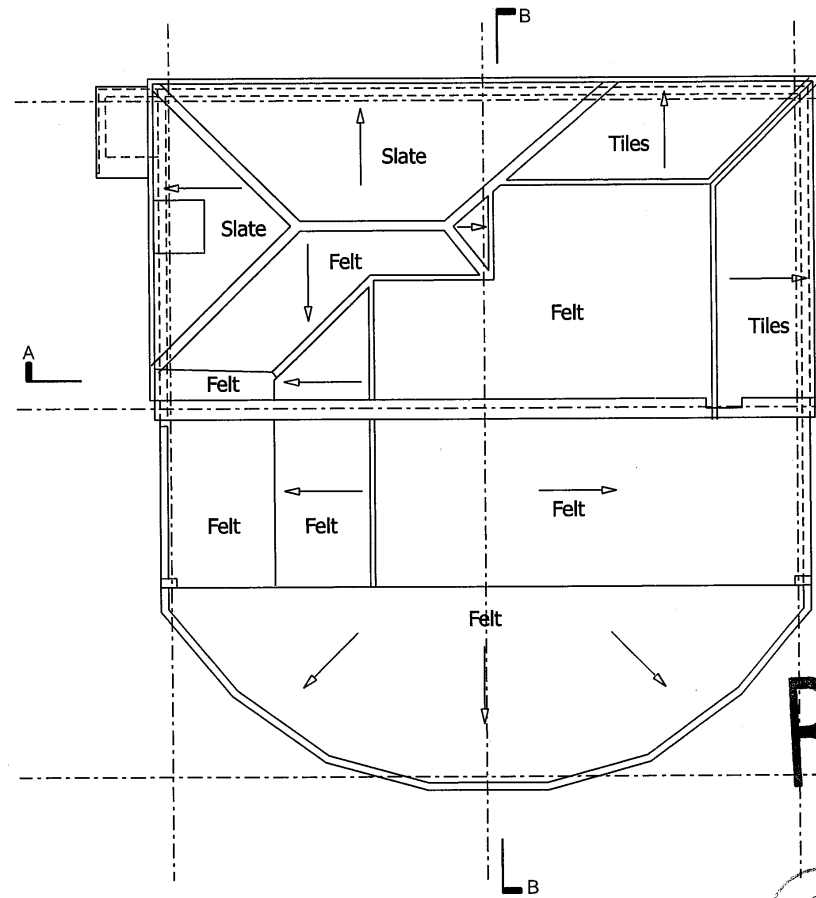
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### Second Floor - Chapel Gallery



Level 2 (Gallery)

### Roof Plan



Level 3 (Roof)

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