

Question 5: Will the residential development proposed on the two sites, individually or collectively, have an adverse impact on the adjacent AONB and, if it does, specifically in what ways will that harm be manifested, having regard to the existing levels of development, currently on site, or as already permitted?

Statement from the AONB Director 22/06/2021

Sally Marsh is a landscape ecologist and has been Co-Director of the AONB Unit for over 25 years. She is a Fellow of the Landscape Institute.

Legislation to provide for AONBs was passed by the post-war Government in 1949. AONB designation is about the beauty of nature and was designed as part of a health campaign to provide for the physical and mental wellbeing of the nation. Three policy outcomes were envisaged:

1. *Preserving for the nation the characteristic beauty of iconic British landscapes, those beloved of Romantic poets and rambles, and those that signified quintessential English countryside threatened by urbanisation.*
2. *Preserving characteristic flora and fauna associated with these landscapes.*
3. *Providing accessibility to nature for all.*

The building of a sanatorium for the Post Office Union workers in the early 20th century on a sunny south-facing ridge with expansive views over the patchwork ancient countryside of the High Weald epitomises the aspirations of AONB legislation enacted decades later. Benenden Hospital sits within a High Weald landscape character which extends to the edge of its distinctive topography, while the boundary is drawn tightly around the site. The strong references to High Weald character in the NDP are welcome but there is nothing in the policies that indicate that High Weald settlement character has been understood and applied in relation to the East End sites. A higher density of residential development and associated paraphernalia will have a suburbanising and homogenising effect on the setting of the AONB and on the current tranquillity and rurality of the area.

This is an isolated site in the countryside originally designed for a single purpose. The scattering of homes is subservient to the dominant hospital buildings and are interspersed with unimproved grassland, as a series of small and large patches and linear strips, which weave through the site connecting to the landscape beyond. Away from the main buildings the site has a rural and tranquil feel, with the greenness of the lanes, grassland and surrounding trees contributing to its rurality. The scale of development proposed will change this balance creating a high-density suburban enclave bolted on to the hospital. From every direction it will create a jarring note.

The residential settlement proposed is equivalent in size to a typical hamlet or small village. A traditional High Weald settlement in this location would have a strong relationship with the existing routeways and surrounding land. It would either be clearly linked to its parent settlement within a short walk or would have grown up around a green, or routeway junction, and exhibit building types designed for trade, craft or agriculture. As currently proposed, this isolated residential enclave would have no obvious parent settlement – it would be completely car dependent – yet it does not include any buildings designed to provide craft, commercial or growing spaces now or in the future that would indicate it could stand alone.

Because land was shaped by hand not heavy machinery, high density housing of this sort is not traditionally found on slopes in the AONB. For this reason, the AONB Housing Design Guide suggests that proposals involving significant earth movement, such as is required to achieve the density proposed by the NDP in the south-east Quarter under current building regulations, would not be in character and therefore such sites should not be allocated.

From the South the roofscape will be a confusing jumble of suburban forms rather than the magnificent award-winning Sanatorium building. This building provides a more recent addition, and adds an early twentieth century story, to the wealth of Iron-masters houses, manor houses and abbeys which contribute to the beauty of the High Weald countryside. The sanatorium shares with these buildings a design quality which asks to be seen rather than hidden, and an estate which connects them to the landscape in which they sit. The High Weald Unit supports SAVE Britain's Heritage proposal to retain the Sanatorium building and turn it into homes which would conserve the contribution this building and its setting makes currently to the AONB.

The relationship of the dominant building to the landscape is exemplified by the elegant arc of the Sanatorium which opens to magnificent views of High Weald countryside and by the extent of unimproved neutral grassland which it draws up to its doorstep. Unimproved grassland with its abundance of wildflowers and associated fauna represents an increasingly rare example of what the High Weald would have looked, and sounded, like for hundreds of years. Species rich grassland such as these provide crucial nodes within a patchwork of habitats across the High Weald which are vital to the Government's ambition of nature recovery. The site is of significant regional interest for its waxcap fungi along with rare and vulnerable grassland flora. These exceptional grasslands are not 'previously developed land' as stated by the NDP (paragraph 2.9.3.1) and should not be included in any allocation. The higher numbers of cats, dogs, lighting and disturbance accompanying additional housing development will be detrimental to the birds, bats, invertebrates and reptiles associated with this grassland. Any traffic by construction vehicles or dumping of spoil, machinery or materials – intended or accidental - during construction will irreparably damage the integrity of this grassland.