

Tunbridge Wells Borough Local Plan Examination

Matter 7 Issue 7 AL/CRS3 – Turnden Farm, Hartley Road

Hearing Statement for 23rd June 2022

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Q7. What is the current position regarding planning application Ref 20/00815/FULL?

Q8. How has the proposed area of residential development been established? What is it based on and is it justified?

Q9. How has the scale of proposed development been determined and is it appropriate and justified in this location, having particular regard to the scale of development proposed for Cranbrook in the existing Site Allocations Development Plan Document?

Q10. Does site allocation AL/CRS3 represent major development in the AONB, and if so, is it justified? How have the potential impacts of development on the character and appearance of the area, including the AONB, been considered as part of the plan-making process?

Background

1. The High Weald AONB Partnership strongly objected to planning application 20/00815/FULL for 165 dwellings on land at Turnden, Cranbrook. It was a Rule 6 Party in the 6-week public inquiry in the Autumn of 2021 which resulted from the Secretary of State calling in the application at the request of a number of bodies including Natural England and the National Association for AONBs. This was an unprecedented resource commitment on the part of the Partnership which reflected its significant concerns about the impact of this development on the AONB and the precedent it would set for other major development proposals.
2. The Inspector of this Local Plan inquiry understandably asks to see this decision, which is due to be released on or before the 4th July. If this planning application is granted then that effectively pre-empts the consideration of this allocation in the Local Plan examination because the principle will have been established. However, if the planning application is refused on an ‘in principle’ rather than detailed matter this will be a significant factor in determining whether the proposed allocation is sound. The level of evidence that was put forward at the inquiry last Autumn far exceeds that which could be considered in a Local Plan examination, so it is not possible to include it all in this Hearing Statement. The following is a summary of the AONB Partnership’s ‘in principle’ objections to the development of this site.

The Landscape Character Of The High Weald AONB And The Turnden Site

3. The High Weald is an outstandingly beautiful landscape cherished by people and celebrated for its scenery, tranquillity and wildlife. Its ridges and valleys are clothed with an intricate mosaic of small fields interspersed with farmsteads and surrounded by hedges and abundant woods, all arranged around a network of historic routeways. It is one of the best surviving medieval landscapes in North West Europe, and has remained a unique and recognisable area for at least the last 700 years.
4. Turnden itself has a history stretching back to at least the 8th century and forms part of the typical Wealden story of people outside of the area travelling into it for grazing

livestock, foraging and accessing other resources. This led to the establishment of 'dens' of which Turnden was one. It has a strong relationship with the prehistoric routeway, now Hartley Road, and the Crane Brook as part of the medieval framework of the farmstead. This is a landscape that has been settled for over a thousand years and used for grazing livestock, raising crops and utilising the woodland and water resources to support the livelihood of the residents of Turnden farmstead and the other farmsteads around it.

5. This 'time depth' is an essential quality of the High Weald AONB and gives meaning to the relationship between its main physical landscape components of geology, watercourses, routeways, settlement, fields and woodland. [The High Weald AONB Management Plan](#) explains how the dens developed into farmsteads and formed the distinctive dispersed settlement pattern of the High Weald which underpins the structure and special character of this AONB.
6. Layered on top of this dispersed settlement pattern is that of the later medieval towns, villages and hamlets, of which Cranbrook and Hartley are the closest to this site. Whilst there were clearly links between these later settlements and the farmsteads, they are two distinctly different forms of settlement. The Management Plan emphasises the need to retain the separation between these settlement types so that future generations can read the landscape and understand how it came to be and how it has been used over the centuries.
7. Many AONB Management Plans focus on the scenic or visual qualities of their landscapes, but in the High Weald its outstanding qualities lie in its time depth and cultural heritage, and this is why it is covered in some depth in the Management Plan. NPPF paragraph 176 acknowledges the importance of cultural heritage in AONBs.

Landscape Evidence Base For The Allocation

8. Following the Regulation 18 consultation on the Local Plan the Council commissioned Hankinson Duckett Associates to undertake a Landscape and Visual Impact Assessment of 21 potential allocation sites in the AONB, including the site at Turnden. The High Weald AONB Partnership's Regulation 19 representations include a critique of this work. In respect of the Turnden site assessment these can be summarised as follows:
 - The description and assessment of Turnden omits positive features and reinforces negative ones.
 - Especially notable is the focus on derelict and disused pony paddocks.
 - No mention is made of the perception of rural tranquillity experienced by users of the footpath through the site, or of the extensive long views from the footpath out to the Greensand ridge. The valuable relatively undisturbed nature of the soils and species diversity of the grassland appears not to merit inclusion.

- Unsubstantiated claims are made such as ‘the proposals are in keeping with Cranbrook’s existing settlement pattern’ with no reference to the historic farmstead and fieldscape pattern that actually comprises the site.
- Benefits are claimed without a balancing view of what will be lost. For example, new woodland screening would apparently be ‘beneficial’ for people using the rights of way when in reality the planting will obscure views across the site and out to the Greensand ridge.
- Similarly, new woodland and wildflower meadows are said to ‘replace disused pony paddocks’, even though we are told there was no specific application scheme before the authors of the assessment, and no mention is made of the existing biodiversity of these fields.

Unsurprisingly given this bias, the conclusion is that development would not result in significant effects on the AONB.

9. In addition, what the assessment does not do is provide any analysis of whether the siting and scale of development is the most appropriate response to its setting as required in the [High Weald Housing Design Guide](#). If it had done this based on a robust understanding of the historic farmstead and fieldscape setting, then it could not have concluded that this scale of development in this location was an appropriate response to its context.

Separation Between Settlements

10. The Management Plan is clear that the separation between settlements in the High Weald is formed by fields associated with individual farmsteads. These historic farmsteads are surrounded by their own fields resulting from Medieval farming in severalty - which is land held by individuals rather than in common. This characteristic is emphasised in the High Weald Housing Design Guide, which says that developments should not subsume farmsteads surrounded by their farmlands.
11. There is no doubt that Turnden was a farmstead, and that it had an important role to play in the historic use of the fieldscape around it and the local landscape of the Crane Valley. Whilst the farmhouse was lost to fire in 2019 the farmstead remains an important component of this historic landscape and some of that significance will still be legible once the farmyard has been redeveloped (18/02571/FULL) due to its farmstead type design and the retention of its fields all around it.
12. However, if the AL/CRS3 allocation is found sound and implemented Turnden Farmstead will no longer be legible as a farmstead because it will be subsumed into the urban sprawl of the combined Brick Kiln Farm / Turnden development and become the eastern edge of Cranbrook. The AONB landscape history of the Crane Valley will no longer be recognisable and its essential character will be lost.

The Fieldscape

13. The fields would not be there without the farmstead, they are in a sense part of the settlement pattern because they attest to the use people have made of the landscape down the ages. This inter-relationship between the different elements of what made up the holdings of Brick Kiln Farm, Hennickers and Turnden is why the Crane Valley must be seen as a whole.
14. The details of this landscape have evolved over the centuries. Hedgerows and woodlands expand when the agricultural use is less intensive and contract or fade when a more intensive use occurs such as the equestrian use most recently on this site. But clues to the historical use of the site lie in the ground and in the landscape, sometimes as retained hedgerows and shaws, sometimes as gappy hedges or single trees and sometimes only as ephemeral ditches and hollows. But to the experienced eye of a landscape historian they tell a story of the High Weald which, once explained, can be appreciated by all its residents and visitors.
15. Even to the non-historian, the fieldscape within the development site is still recognisable. It is possible to correlate the fields shown on the earliest mapping in 1799 with those mapped later in the 19th and 20th centuries and these same four fields can be seen today, albeit with some boundaries only represented by a ditch or remnant hedge. Just as a person changes over time but remains recognisable, so has this fieldscape.
16. What is significant about the High Weald is the extent to which the medieval landscape pattern has endured and can be recognised despite changing agricultural practices over hundreds of years. This distinctive High Weald character will be lost here if the development goes ahead. The allocation will cause material harm to the AONB.

Urban Influences

17. The Council considers that the consented developments at Brick Kiln Farm and Turnden Farmstead justify the proposed allocation on the land between them. Brick Kiln Farm was first put forward in the Site Allocations DPD, adopted in 2016. The Inspector examining that plan said *“the proposed allocation is in a self-contained landscape area which facilitates a sustainable extension to Cranbrook with the lowest achievable impact on landscape. The selection of the allocation site, which is largely self-contained in landscape terms serves to moderate the harm that development of this scale in any alternative site would cause to both the AONB and the historic town centre”*. It is clear that the Inspector was greatly influenced by what he saw as the ‘containment’ of the site and there was no thought in his mind that this would be phase 1 of a larger scheme. If he had considered that this scheme would exert an urban influence on the Crane Valley, then he could not have concluded that it would have the “lowest achievable impact on landscape”.

18. At the time the first Turnden Farmstead scheme was submitted in August 2018 the listed farmhouse still remained on the site as did the modern farm buildings and stables associated with its previous mixed equestrian and business use. The new owners, Berkeley Homes, put forward a scheme to restore the farmhouse and build a further 36 dwellings to replace the existing buildings. In the Committee report it says the design intent has been drawn from the Council's Farmstead Assessment Guidance, as follows;
- A design concept of a multi-yard farmstead with the working buildings and smaller cottages set around a series of linked yards and courtyards, subservient to the main Turnden farmhouse;
 - Each yard has a collection of buildings around it, structured to provide a hierarchy of buildings that might have previously had a defined use for example; workers cottages, barns, stable blocks, storage sheds and farmhouses..."
19. Clearly the intent was to design a scheme that respected the farmstead history of the site and the dispersed rural settlement character of its surroundings. The applicant's vision for this site was *"to provide a new high quality, sustainable development that is sympathetic to its rural location, designed to assimilate with the surrounding countryside, and provide in a farmstead style form which seeks to provide an attractive place for residents to live"*. This farmstead character is also stressed in the more recent planning application on this site to replace the burnt farmhouse and add three new dwellings (21/01379/FULL). If this vision is realised then the development will not have an urbanising influence on the proposed allocation site.

Views

20. The AONB Management Plan focuses on time depth, physical landscape components and settlement pattern rather than visual amenity. However, I will just touch on two visual matters: the matter of 'containment' and the views from the site to the Greensand Ridge.
21. It has been suggested that the proposed allocation site is 'contained' within the Crane Valley. Of course, the valley itself is within the AONB so even if there are no views from the wider landscape, the impact on the valley is still important. Whilst topography is likely to stay the same, vegetation is subject to change, either through human interventions or through natural processes. Ash Dieback is already a significant issue in Kent and the Woodland Trust estimates that it will affect 90% of ash trees in England. Its implications for visual 'containment' are clear, trees affected by Ash Dieback have little or no foliage. They will not be effective at screening views of the development and their replacements will take many decades to become useful for screening.
22. Added to which, this valley is not in fact topographically contained because it has ridges only on three sides, the fourth side is open to views across to the Greensand Ridge 12 miles away. The views of the Greensand Ridge from footpath 115 are of local

importance, and that is evidenced by their inclusion in the views document produced for the draft Cranbrook and Sissinghurst Neighbourhood Plan. The rarity of such views in the heavily wooded High Weald makes them all the more precious to local people.

Ecology And Biodiversity

23. The fields around the farmstead have been used for grazing livestock for hundreds of years. Historical mapping indicates that the site appears to have been continually used as pasture since the mid 19 C with only one field put to orchard for a short period starting in the 1930's, and there is no evidence of the fields being ploughed or used for arable crops.
24. The intensive equestrian use of the site ceased around 2017 and the pastures have since been recovering with the variety of plant species increasing. Soil biodiversity is highly dependent on the amount of soil disturbance. Here we have pastures that have not been ploughed and therefore whose soils have been undisturbed for hundreds of years. Surveys shows high levels of organic matter within the soil (6.6 – 7.3%) levels which indicate a considerable loss of soil carbon to the atmosphere if they are disturbed, as is inevitable with any development of this site.

Justification For Major Development

25. NPPF 177 on major development in AONBs is clearly intended to be applied at the planning application stage. However, it is relevant to the consideration of Local Plan allocations because, if they are unlikely to pass the exceptional circumstances and public interests tests in this paragraph, then the allocation will be undeliverable.
26. Table 10 of the Council's Development Strategy Topic Paper for Pre-Submission Local Plan (February 2021) acknowledges that the proposed allocation on this site would amount to major development. This Topic Paper also sets out the justification for allocating major development in the AONB, which is to be discussed under Matter 2 Issue 1 and Matter 3 Issues 1 and 2. If the Local Plan Inspector accepts our case that the housing provision number should be reduced to reflect the fact that nearly 70% of the Borough is in the AONB, then the argument for allowing such major developments as proposed at Turnden would fall away and the tests in NPPF 177 would not be met.

Conclusion

27. In conclusion, the development of this site would cause serious harm to the natural beauty of the High Weald AONB and would amount to unjustified major development contrary to paragraphs 176 and 177 of the NPPF. It is therefore unsound and should be removed from the Local Plan.