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5<sup>th</sup> November 2020  
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Andy Watt  
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Dear Andy

**Response to Fourth Landscape Consultation Letter regarding the Outline Planning Application for a single chapel Crematorium with a single abated cremator and Natural Burial Site with associated access, car parking, landscaping and drainage. All matters reserved apart from access. Turners Hill Burial Ground, Turners Hill Road, Turners Hill RH10 4PB. Reference: DM/20/2877**

Further to our recent 'Teams' discussion I am writing with respect to the latest landscape consultation response letter by Virginia Pullan that you recently uploaded to the Council's website (the fourth version, dated 02/11/20, which I note is different to the first three).

Whilst this is not intended to be a 'rebuttal', and I do not wish to pick endlessly over this correspondence (and clearly I do not agree with some of the content of Ms Pullan's letter) I do think it is worth reiterating two key points which Ms Pullan has continually overlooked in her four versions of the assessment of the effects of the above development:

1. **That Ms Pullan's Likely consideration of effects are restricted almost entirely to the site itself**
2. **The approved fallback position – including previous approval of extensive woodland planting across the site**

### **The Extent of Likely Effects**

In her assessment of the likely effects of the proposal Ms Pullan focuses almost entirely on the effects on the site itself, rather than the effects on the surrounding landscape character.

The purpose of Landscape and visual impact assessment is to consider the effects of a proposed development on visual receptors (people), and on the landscape character of the area surrounding the site. Effects on the site itself are an inevitable consequence of development, but it is the effect on overall landscape character within the area surrounding the site (i.e. the local character of this part of the landscape) that is most relevant.

From my perspective it is accepted that there would be effects on the character of the site itself (these are acknowledged within the submitted Landscape and Visual Appraisal and form part of the assessments made), but given the extent of woodlands in the surrounding landscape the effects of the proposals on the surrounding landscape character would be limited (particularly in the medium to longer term).

I refer you to paragraph 9.2.4 on page 59 of the LVA which summaries as follows:

*“Whilst the scheme would involve built form on the Site, the comprehensive mitigation planting proposed would ensure that the proposals would integrate effectively into their surroundings, responding to both the existing natural burial use and to the surrounding woodlands, and would not undermine the rural character of the surrounding countryside.”*

### **Fallback Considerations**

Ms Pullan appears to be missing the relevance of the fall-back position, and the fact that the site has permission as a natural burial site, with a new access (implemented), a chapel, reception building, maintenance building, car parks (part implemented) and the approved nature of natural burial, which will in time turn into a woodland.

This latter point is clearly demonstrated by the following drawings which were part of the woodland burial approval:

- Lizard Landscape Design drawing LLD787/01 Rev – “Location Plan Phased Development”.
- Lizard Landscape Design drawing LLD787/02 Rev 01 - “Illustrative Landscape Proposals Phase one – woodland planting”
- Lizard Landscape Design drawing LLD787/03 Rev 02 - “Ecological and landscape masterplan strategy – Phase one”

These drawings are reinforced by the ‘Operation statement’ dated January 2015 which clearly states that “A woodland burial site, such as is proposed, involves natural burials either in existing woodland, or on open land where trees are planted on or near the grave, creating new woodland over time.” [ Paragraph 3, emphasis added]; and by the frequent references to woodland planting [for example see paragraphs 4, 5, 9, 10 and 12].

These drawings and documents are further reinforced by drawings submitted as part of the discharge of conditions (listed below):

- Future PD drawing I587/01 Rev – “Location Plan Phased Development”.
- Future PD drawing I587/02 Rev 01 - “Illustrative Landscape Proposals Phase Two – woodland planting”
- Future PD drawing I587/01 03 Rev 01 - “Ecological and landscape Phase Two – Woodland Planting”

In addition, we have provided evidence in the form of photographic images of the mature natural burial site at Hamdown, Dorset. These provide a visual reference and example of how we expect the existing approved development on this site will appear as the development matures over time.

In conclusion I wish to reiterate the findings of the Landscape and Visual Appraisal; that (even ignoring the fall-back position) the effects of the proposed development on visual receptors in the surrounding landscape are extremely limited (LVA page 60, paragraph 9.3.12), that effects on overall visual amenity are very small (paragraph 9.3.14); and that effects on Overall Landscape Character would be largely mitigated in the medium to long term (see my earlier reference to paragraph 9.2.4 on page 59 of the LVA).

I hope that this is helpful and assists you in your consideration of the planning application. Even with the County Landscape Officer still maintaining an objection to scheme, I believe that when considered "in the round" with the points discussed above the landscape impacts should be considered acceptable (given the material considerations of this case) and are consistent with local and national policy.

Finally as I have not been able to speak directly to the County Landscape Architect (which has frustrated our efforts to resolve this matter), I repeat again the offer made by the planning agent, Lisa Jackson, that we welcome a meeting to discuss these points so we can reach common ground on landscape effects in advance of your reporting to committee.

Yours sincerely

Mark Gibbins  
Director  
For and on behalf of  
Indigo Landscape Architects Ltd.

cc Sally Blomfield – Mid Sussex District Council  
Nick Rogers - Mid Sussex District Council  
Thomas Seccombe - Mid Sussex District  
Lisa Jackson - Jackson Planning  
Andrew Tabachnik QC - 39 Essex Chambers  
Mark Brassey - Collins Benson Goldhill  
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