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01/09/20

DM/20/2877

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For the attention of: Mr. A. Watt

Description: Outline application for 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.

Location: Turners Hill Burial Ground, Turners Hill Road, Turners Hill, West Sussex RH10 4BP

With reference to your letter asking for comments on the above application, having reviewed the documents I have the following comments with regard to the potential landscape and visual impacts. This advice is provided to the Local Planning Authority by the County Landscape Architect in line with the Service Level Agreement and is not a statutory consultation response.

1) Summary Recommendation

Recommend for refusal	<p>The proposal would not comply with NPPF Section 15 policies for conserving and enhancing the natural environment.</p> <p>This is with particular reference to Paragraph 170 which requires planning policies and decisions to contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan). b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; <p>The proposals would not comply with paragraph 172: Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.</p>
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2) Reason for Recommendation

1. The NPPF Section 15 provides policies for conserving and enhancing the natural environment. Paragraph 170 states that :

'Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan).*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
- e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and*
- f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.*

2. Further to the above paragraph 172 requires that:

2.1 *Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.*

2.2 If permitted the proposed development would need to incorporate suitable landscape mitigation measures to ensure that it would meet the design requirements of the NPPF. This would include appropriate design details for the building as well as external hard works and planting.

2.3 The site is not within the High Weald AONB, however it is immediately adjacent to the boundary which is Turners Hill Road.

Landscape and Visual Context

2.4 The proposed development is supported by a Landscape and Visual Impact Assessment or LVIA (Indigo Landscape Architects, August 2020). This report provides an accurate description of the baseline landscape and visual context for the site and surrounding area. The methodology for the assessment is based on recognised good practice.

2.5 The LVIA does note that the assessment of potential effects is based on assumptions with regard to the detailed design and layout. This would presumably include the design and scale of the building, the layout of parking areas and earthworks. The final detailed scheme could be significantly different to that described in the submitted plans and this would bring into question the conclusions with regard to potential landscape and visual effects on local views and specific elements of landscape character such as topography and tranquillity.

Potential landscape and visual effects

- 2.6 The LVIA concludes that the overall visual effects of the proposed development would be substantial and major adverse on completion of the development reducing to slight adverse/neutral by year 15 when the proposed mitigating planting has matured. This is relying on the implementation of a landscape masterplan which would provide heavily wooded areas to the north and west of the proposed development. Detailed comments with regard to the appropriateness of the proposed landscape mitigation are provided below. The proposed crematorium building would be likely to have a major and long term adverse effect on views from sections of the public footpath 68W which runs through the middle of the site. The potential visual impacts on the High Weald AONB are difficult to assess as this is an outline application. Depending on the detailed design the proposed car parking, crematorium building and increased activity could have an adverse impact on the setting of the AONB.
- 2.7 The LVIA concludes that the overall impact on local landscape character would be moderate adverse on completion reducing to slight adverse at year 15. This assessment identifies that the site is of high landscape sensitivity (section 5.4) and that the magnitude of effect would be medium to low. Policy THP8 of the Neighbourhood Plan seeks to ensure that development does not have a detrimental impact on areas of substantial landscape value and sensitivity. Whilst the site would be unlikely to be considered to be valued landscape in the context of the NPPF it is assessed to be of high sensitivity by the LVIA.
- 2.8 The LVIA methodology, Table Y: Overall effect on landscape character, sets out the following:

Criteria for assessing magnitude of landscape effects on overall landscape character:

High adverse: The proposals are very damaging to overall landscape / townscape character in that they would cause major loss of, or major alteration to, key components of the baseline landscape / townscape

Medium adverse: The proposals are slightly damaging to overall landscape / townscape character in that they would cause minor loss of, or slight alteration to, key components of the baseline landscape / townscape

Slight Adverse: The proposals cause minimal damage to overall landscape / townscape character in that they would cause very minor loss or alteration to key components of the baseline landscape / townscape.

- 2.9 Applying the above criteria it is suggested that the magnitude of effect on the topography and tranquillity of the site would be more likely to be medium to high. The introduction of a complex access road and car parking for 109 cars in addition to the permitted 45 spaces would be a considerable change to the green field site. The impact of creating the car parking and access roads would require levelling and re-profiling of the site topography. The crematorium building would have a floor area considerably larger than the combined footprint of the permitted chapel and reception building. The LVIA concludes that as the crematorium building would be set back further from the road than the approved chapel the overall visual impacts would be lower. This does not take into account the impact of the access road and parking areas and activity associated with a crematorium. The impact of the crematorium building and parking would be greater when viewed from the countryside to the north than the permitted development. In the previous permitted appeal decision (DM/17/1167) the Inspector concluded that the proposed development would be acceptable as it would concentrate development close to the road and permitted carpark.
- 2.10 The impact on tranquillity of at least two funerals a day would introduce considerably more vehicle and people movements than the permitted development. The LVIA suggests that these components would not be uncharacteristic of the surrounding landscape. This is an underassessment of the potential impact of large numbers of people, cars and activity around the crematorium building. This increased activity adjacent to the AONB boundary could have an adverse impact on the tranquillity of the AONB in the vicinity of the site.

Proposed mitigation

- 2.11 The Mid Sussex Landscape Character Assessment (MSLCA) places the site within the High Weald Forest Ridge landscape character area. One of the key issues identified for this area is the lack of management of existing woodland areas.
- 2.12 The following Land Management Guidelines, taken from the MSLCA, for this character area are relevant to the site and surrounding area :
- Maintain and restore the historic pattern and fabric of the woodland and agricultural landscape for scenic, nature conservation and recreational purposes.
 - Extend existing woodland areas rather than creating new woodland features, reinforcing existing, distinctive landscape patterns.

The landscape masterplan for the permitted development would provide a more varied mosaic of tree planting to the site boundaries and retain open meadow areas. By contrast this application is relying on dense woodland planting over most of the western and northern part of the site area. This is required to screen the development as outlined in 2.6 above, this would mask the character of the existing open fieldscapes and would not maintain the historic landscape pattern. The long term management of these woodland areas would also need to be secured so as not to add to the issue of inadequately managed woodland in the LCA outlined above.

Previous Appeal Decisions DM/17/1167

- 2.13 The Inspector for the above appeal concluded that the chapel located close to and parallel to the road would concentrate activity close to the permitted car park. This application would push the development deep into the site. He also considered that the modest scale of the chapel would not undermine the rural landscape character of the site and surroundings.
- 2.14 The Inspector for the earlier dismissed appeal DM/16/1887 for houses on this site concluded that landscaping should not be used to hide an otherwise unacceptable large scale development.

Conclusion

- 2.15 It is recommended that the application is not supported as the proposed scale and intensity of use would have an unacceptable impact on local landscape character and views.

Yours Sincerely,

Virginia Pullan CMLI
County Landscape Architect
East Sussex County Council