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date

16/09/20

your ref

DM/20/2877

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

The following comments are provided in response to the letter from Jackson Planning dated 08/09/2020 as a rebuttal to comments provided by the East County Landscape Architect dated 01/09/2020.

Please note that the advice given to Mid Sussex District Council by the County Landscape Architect is given as part of a service level agreement between East Sussex County Council and Mid Sussex. The weight to be given to the content of these responses is a matter for the Local Planning Authority.

1.0 The Summary recommendation as outlined in the landscape comments provides a reference to the relevant NPPF policy context against which proposed development should be tested. The reference to policy 170(a) is included so that this test can be applied.

2.0 NPPF Paragraph 170(b).

2.1 The Mid Sussex District Plan does not designate specific areas for their landscape character and qualities. In accordance with Natural England guidance the district does have a Landscape Character Assessment which identifies areas of distinct character across the district. Development proposals for the site would need to be assessed for the impact on the key landscape characteristics and sensitivities of the site and surrounding area.

- 2.2 The LVIA Appendix G contains landscape masterplans for the extant permissions. These include Illustrative landscape proposals for the permitted developments associated with the natural burial ground, Lizard Landscapes LLD787/02, and planting plan hla 359 01, associated with the chapel. The latter is the more recent permission and indicates woodland planting around the periphery of the site and groups of trees around the chapel and car parks. In both extant permissions the proposed woodland planting is less extensive than in the current application. In the current application the woodland planting would extend further east across the site to the north of the proposed crematorium development. The visual assessment of views from footpath 68w would suggest that this planting is primarily intended to screen the proposed development from the public footpath.
- 2.3 It is not contested that the visual impacts would be restricted to the local area. There are likely to be significant long term adverse visual impacts on the AONB immediately to the south, Turners Hill Road and Public footpath 68w.
- 2.4 As the proposed development is in outline the landscape comments are based on the worst-case scenario.
- 2.5 There would be close views to the crematorium building and other parts of the proposed development including access roads and car parking. The proposed mitigating woodland planting for the extent of this path through the site would change the experience of walkers from open views across countryside to enclosed woodland. This could be oppressive compared with the experience of a mosaic of open and enclosed views for users of this path.
- 2.6 In relation to paragraph NPPF 170(b) the proposed development would have a significant impact on the intrinsic character and beauty of the local countryside. It is for the Local Planning Authority to consider the weight that this is given in relation to other considerations including need.
- 3.0 The Summary recommendation as outlined in the landscape comments provides a reference to the relevant NPPF policy context against which proposed development should be tested. The reference to policy 172 is included so that this test can be applied as the proposed development is adjacent to the AONB boundary.
- 4.0 The conclusions of the LVIA with regard to visual impacts on the AONB are not contested.
- 5.0 The landscape consultation comments dated 01/09/20 are based on the information and drawings as provided to support the application. The detailed design and the need for conditions are matters for the consideration of the local planning authority.
- 6.0 With reference to paragraph 2.6: The proposed development would be greater in scale and extent than the extant permissions. The proposed crematorium would require a larger building set deeper into the countryside with extensive hard surfaced areas for car parking and access roads. The requirement for a larger building and a much larger car park would suggest that the activity associated with a crematorium would be more intense than that for the consented natural burial ground and chapel. The impact on relative tranquillity would be much greater than the consented development.
- 7.0 With reference to paragraph 2.7 and 2.8: The LVIA conclusions regarding magnitude of effect and potential impacts on landscape character are acknowledged, as is the error in referencing Table Y in these paragraphs. Notwithstanding this, it is considered that the scale of the proposed development and impact on tranquillity, applying the criteria in Table Y, would be more likely to have a magnitude of effect Medium to High adverse on completion reducing to Medium adverse in the longer term. Referring to the application of

Table Z, Landscape effect significance matrix, the application of the above magnitude of effect on a landscape of high sensitivity would be substantial adverse on completion of development reducing to major adverse in the longer term.

8.0 With reference to comments on paragraphs 2.9 – 2.14. As the application is in outline and the LVIA is based on certain assumptions the landscape comments are based on a worse case scenario which does take into consideration the extant permission in combination with the current application. In this context the following assumptions have been made:

8.1 The number of parking spaces could be 110 plus the permitted 44.

8.2 The landscape masterplan relies heavily on extensive woodland planting to mitigate the visual effects. This approach would not be in keeping with local landscape character and would compromise the visual experience for users of the public right of way and Turners Hill Road.

8.3 The typical level of use and activity associated with at least two funerals a day in the crematorium would have an impact on the tranquillity of the local countryside and the adjacent AONB.

Yours Sincerely,

Virginia Pullan CMLI
County Landscape Architect
East Sussex County Council