

Town and Country Planning Act 1990

**PROPOSED CREMATORIUM AT
TURNERS HILL NATURAL BURIAL GROUND**

LANDSCAPE AND VISUAL IMPACT ASSESSMENT
(Appendix A to CD8.1 Mid Sussex Landscape Proof)



APRIL 2021

For and on behalf of
Mid-Sussex District Council
Oaklands, Haywards Heath
by
Ryder Landscape Consultants Ltd

PROPOSED CREMATORIUM, TURNERS HILL, MID-SUSSEX

Landscape and Visual Impact Assessment (LVIA)

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LVIA Appendix B – Illustrations (Shared with Proof of Evidence and bound as a separate document)

LVIA Appendix C – Landscape Character Assessments Extracts

Illustrations in LVIA Appendix B and bound separately

RLC Figure 1 – Location Plan

RLC Figure 2 – Landscape Character Extract

RLC Figure 3 – Landscape Survey and Analysis Plan

RLC Figure 4 – Routes and Access Plan

RLC Figure 5 – Not used

RLC Figure 6 – Photography Viewpoints Location Plan

RLC Figure 7 – Viewpoint Photography and Analysis Sheets

Glossary

DESIGNATED LANDSCAPE – areas of landscape identified as being of importance at international, national or local levels, either defined by statute or identified in development plans or other documents.

ELEMENTS- individual parts that make up a landscape, such as for example trees, hedges and buildings.

FEATURE – particularly prominent or eye- catching elements in the landscape, such as tree clumps, church towers or wooded skylines OR a particular aspect of the project proposal.

KEY CHARACTERISTICS – those combinations of elements which are particularly important to the current character of the landscape and help to give an area its particularly distinctive sense of place.

LANDFORM – the shape and form of the land surface which has resulted from combinations of geology, geomorphology, slope, elevation and physical processes.

LANDSCAPE – an area, as perceived by people, the character of which is the result of the action and interaction of natural and/or human factors.

LANDSCAPE CHARACTER – a distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another.

LANDSCAPE CHARACTERISTIC – elements, or combinations of elements, which make a landscape character distinctive.

LANDSCAPE CHARACTER AREAS (LCAs) –these are single unique areas which are the discrete geographical areas of a particular landscape type.

LANDSCAPE CHARACTER TYPES (LCTs) - these are distinct types of landscape that are relatively homogenous in character. They are generic in nature in that they may occur in different areas in different parts of the country, but wherever they occur they share broadly similar combinations of geology, topography, drainage patterns, vegetation and historical land use and settlement pattern, and perceptual and aesthetic attributes.

LANDSCAPE EFFECTS –effects on the landscape as a resource in its own right.

LANDSCAPE RECEPTORS – defined aspects of the landscape resource that have the potential to be affected by a proposal.

LANDSCAPE VALUE – the relative value that is attached to different landscape by society. A landscape may be valued by different stakeholders for a whole variety of reasons.

MAGNITUDE (OF EFFECT) – a term that combines judgements about the size and scale of the effect, the extent of the area over which it occurs, whether it is reversible or irreversible and whether it is short or long term.

SENSITIVITY – a term applied to specific receptors, combining judgements of the susceptibility of the receptor to the specific type of change or development proposed and the value related to that receptor.

SIGNIFICANCE – a measure of the importance or gravity of the environmental effect, defined by significance criteria to the environmental topic.

SUSCEPTIBILITY – the ability of a defined landscape or visual receptor to accommodate the specific proposed development without undue negative consequences.

VISUAL AMENITY – the overall pleasantness of the views people enjoy of their surroundings, which provided an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area.

VISUAL EFFECTS – Effects on specific views on the general visual amenity experienced by people.

VISUAL RECEPTORS – individuals and/or defined groups of people who have the potential to see or otherwise be affected by proposed development.

1.0 Introduction, Authorship and Instruction

- 1.1 Ryder Landscape Consultants (RLC) were commissioned by Mid-Sussex District Council (MSDC) in March 2021 to undertake a Landscape and Visual Impact Assessment (LVIA) to consider the likely landscape and visual effects associated with proposed crematorium development at the Turners Hill Natural Burial Ground near Turners Hill in Mid-Sussex (herein referred to as “the Site”).
- 1.2 The application was submitted to MSDC given application reference DM/20/2877 it was refused at Planning Committee on 21st December 2020 and immediately appealed by Hartmires Investment Ltd who are now the Appellant.
- 1.3 The Site lies entirely within the MSDC planning boundary and adjacent to the High Weald Area of Outstanding Natural Beauty (AONB).
- 1.4 The LVIA findings will be incorporated into the Proof of Evidence of Mr Stuart Ryder who is acting as Expert Landscape Witness at the upcoming Appeal.
- 1.5 This LVIA has been carried out between March 2021 and April 2021 by an experienced Chartered Landscape Architect – Stuart Ryder - with extensive experience of LVIA work. It has been written in accordance with the Guidelines for Landscape and Visual Impact Assessment – Third Edition (GLVIA3) published by the Landscape Institute and Institute of Environmental Management and Assessment in March 2013.
- 1.6 Within this report, the landscape and visual baseline environment of the Site and its surroundings are established. Taking these factors into account, the landscape and visual effects of the development are then predicted. As an aid to the reader landscape information is generally presented in tables with green shading and visual information in tables with blue shading.
- 1.7 It has been produced so that MSDC have their own LVIA of the proposed crematorium facility which in turn allows the Proofs of Mr Andy Watt as Planning Witness and Mr Stuart Ryder as Landscape Witness to be based upon their own, up to date evidence.
- 1.8 The LVIA is to assess the effects of the proposals against the current landscape condition of the Site and with its consented use as a natural burial ground implemented.

2.0 Site Description and Proposed Development

Site description and location

- 2.1 The site comprises two fields set to the north of Turners Hill Road approximately 650m to the west of the village of Turners Hill centre.
- 2.2 The two field parcels total 7.2ha in area, For the sake of this descriptive section these two fields are referred to as the southern field where the proposed crematorium facilities would be sited and the northern field where the already consented natural burial internments would occur.
- 2.3 The southern field is larger and is set higher up the valley side immediately adjacent to Turners Hill Road. The Site access has been formed into this field to service its consented use as a natural burial ground. Part built in the southern field are an existing maintenance barn / workshop and hard surfacing for interconnected car parking areas. The final surfaces of the car park and access road have not been implemented.
- 2.4 The northern field is smaller and more regular in shape compared to the southern field and runs down the valley side to the west of an area of designated Ancient Woodland called Butchers Wood. It currently is part of a larger field but understood to be in the full ownership of the Appellant.
- 2.5 The two fields are bisected by a Public Footpath with reference 68W. Neither fields are classed as agricultural land with their lawful use as a natural burial ground.

Submitted drawings and documents

- 2.6 The list of submitted illustrative information and supporting documents for the crematorium proposals is set below.
 - Site Plan 917-GA-01 C 05.08.2020
 - Site Plan 917-GA-02 A 05.08.2020
 - Location Plan 917-GA-03 - 05.08.2020
 - Site Plan 917-GA-04 A 05.08.2020
 - Landscaping Details 917-MP-01 A 05.08.2020
 - Landscaping Details 917-MP-02 A 05.08.2020
 - Landscaping Details 917-MP-03 A 05.08.2020
 - Proposed Sections 917-MP-05 B 05.08.2020
 - Site Plan 917-SK-01 I 05.08.2020

In addition there is a Design and Access Statement and a Landscape and Visual Impact Appraisal Rev C dated August 2020 both produced by Indigo Landscape Architects in support.

The proposed development

2.7 The proposed development is illustrated on Indigo Landscape Architects drawing 917-SK-01 titled Illustrative Layout Plan Rev I dated 27-7-20. The proposals are best thought of as a complex in the landscape with the crematorium building at its centre and supporting elements around it. These elements can be split into three broad groups;

- Access elements;
- Ceremonial and setting elements; and
- Functional elements.

Access elements

2.8 The process of arrival and entry to the crematorium for ceremonies is as follows;

- Entry off Turners Hill Road via a bell mouth highway turning approximately 25m wide;
- An initial two way section of tarmac access road taking site users to different parts of the Site;
- Mourners' vehicles will carry on turning right to use the main curved car park area on a one way loop system. After parking they would walk down a central spine path to reach the southern door of the crematorium building.
- There is a further overflow car park 15 spaces near to the Site entrance which is accessed by turning left after entering Site rather than curving to the right to the main car park of 80 spaces. The walking route from the overflow car park to the crematorium building is unclear.
- The main funeral cortege would turn left just before the main car park to process to the crematorium building's porte cochere for transferal of the deceased's coffin or casket to the crematorium building; and
- After the service the principal mourners would leave in the cortege on the loop road system to the east of the car park and other mourners would return to the main car park to do the same.

2.9 Members of staff would also take the cortege turning to park their vehicles to the west of the crematorium building; in a service yard area and presumably access through a service entrance to the west of the building.

2.10 There is a string of informal footpaths indicated through the southern field to allow movement around the Site for visitors who may be attending funeral ceremonies or attending for their own private acts of remembrance.

2.11 There is a single reinforced grass track leading from the approved barn / workshop consented under DM19/5100 directly to the north to skirt the northern boundary of the southern field before turning more directly north through a gap in proposed and existing hedgerows to access the natural burial area in the north field.

- 2.12 Public access through the site is retained on Footpath 68W that follows the southern field's north boundary and effectively separates the two fields. The proposals show this footpath route hedged on both sides where currently it is only partially hedged on its northern side.

Ceremonial and setting elements

- 2.13 The porte cochere to the front of the building is part of the ceremony and allows a dignified transfer of the body from the hearse to the crematorium building in all weather conditions.
- 2.14 Whatever service is undertaken will take place in crematorium building and the mourners will exit via a double door in the east side of the building to pass by the floral tributes laid out for display. At some crematoria this is under cover to protect the displays but also to provide shelters for mourners after the ceremony particularly if there is a 'receiving line' formed by the principal mourners. There is no such shelter indicated on the proposals.
- 2.15 The two door system also assists in keeping the mourners of separate funerals apart.
- 2.16 Parkland to the east of the crematorium building is indicated to provide a backdrop to look out onto during the ceremony itself albeit there do not appear to be any picture windows in the crematorium building to maximise sight to the scenic view indicated on the illustrative layout plan. The parkland is also indicated as providing scenic views from the floral tribute area again as a backdrop for mourners to gather after the actual ceremony.
- 2.17 Crematoriums also act as a location for acts of private remembrance with visitors choosing to mark the death of a loved one on significant days such as birthdays or anniversaries. Such acts of private remembrance usually take place away from the main crematorium as is the case with these proposals with a circular hedged garden of remembrance approximately 40m in diameter positioned 40m to the west of the crematorium building. There are no formal paths around or through the garden indicated.
- 2.18 There appears to be no book of remembrance facilities associated with the crematorium building.
- 2.19 The natural burial area can also be classed as an area of remembrance with the trees that are typically planted as a living commemoration of the person naturally interred. The planting of remembrance trees in natural burial areas is not mandatory with people choosing plaques or stones to physically mark the burial position or simply recording the position with GPS co-ordinates.

Functional elements

- 2.20 Like any piece of landscape that is managed for its pleasant amenity and as a place to receive visitors there is a need for operational areas to support the wider maintenance of the Site.
- 2.21 One such maintenance facility is the maintenance barn and workshop already constructed on Site and visible in many of the photographs of Site held in Appendix B. Consented under DM/19/5100.

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- 2.22 This barn appears large, functional and incongruous in its current setting and was proposed to service the consented natural burial area activities. It is shown on the proposals retained to service the crematorium and remaining natural burial ground. The original natural burial ground was proposed for both the northern and southern fields but with the current application is set only in the northern field.
- 2.23 The natural burial ground consented under DM/15/1305 is not operational and does not appear on the burial ground list of the Association of Natural Burial Grounds (ANBG)¹ which is effectively a 'trade organisation' with its own code of conduct seeking to ensure the highest professional and environmental standards are achieved by its members. Nor does it appear in the list of upcoming natural burial grounds proceeding through the planning system and development². Membership of the ANBG is not mandatory for operators of natural burial grounds.
- 2.24 The crematorium building itself has a service yard of a similar footprint to the building to the west. As explained in the summary of access this service yard holds four staff parking spaces and provides a turning area for waste collection lorries, deliveries or equipment required to service the cremator equipment.
- 2.25 Cemeteries and crematoria generate a surprising amount of waste products with floral tributes being a prime source of non-recyclable waste. To this can be added green waste from cutting of lawns, hedges and general upkeep of a more intensively managed park-like landscape. There will likely be wheeled commercial waste 'dumper-bins' stored in the service yard. There is no marked or obvious green waste deposit location on the illustrative layout plan.
- 2.26 There is a row of five rectangles with smaller black squares in them set on unpaved ground to the west of the service yard, it is unclear what function these perform or suggest.
- 2.27 Within the car park there are two functional areas associated with rainwater management. The first is annotated as attenuation basin I to the north west of the larger tarmac surfaced car park. It is unclear whether this would be a basin kept entirely in the dry, or with water permanently at its base. The second functional areas in the car park are the two rain gardens set between the unbound smaller portion of the car park and the larger tarmac section.
- 2.28 A small bike park is shown situated to the south east of the crematorium building on one of the path routes back from the floral tribute area to the main car park.

Crematorium building

- 2.29 The crematorium building itself is proposed to be a single storey, predominately flat roof building set towards the centre of the southern field to be in compliance with the Crematorium Act 1902.

¹ <http://www.naturaldeath.org.uk/index.php?page=find-a-natural-burial-site> – accessed 9/4/21

² Ibid

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- 2.30 Set at a ground level of 164.00m AOD partway down the sloping field the roof line of the building set at 168.50m AOD makes the effective height of the building 4.5m. Above this stands a sloping skylight over the aisle of the ceremonial room, at 171.00m AOD this increases the height to 7.0m. The cremator chimney also reaches up to 171.00m AOD at the north west corner of the building.
- 2.31 The architecture of the proposed crematorium building appears simple as presented. The ceremony room is shown as holding 96 chairs.
- 2.32 The overall floor space for the proposed ground floor footprint of the crematorium building is approximately 515m². This increases to approximately 830m² when the porte cochere is included.
- 2.33 If the building's service yard (approximately 360m²) and floral tribute area (390m²) are included in the building's measure as hard spaces who uses are directly associated with the crematorium building this increases again to 1,580m². The SoCG provides an overall figure of 1,600m².

Car park proposals

- 2.34 The proposed main car park contains 80 spaces and is arranged on a curving alignment generally set with the Site's contours in a broadly east to west orientation. It sits in the position between Turners Hill Road and the crematorium building. The car park needs to be at this scale to accommodate larger funerals.
- 2.35 There are two curving searchways with spaces arrayed off both sides of the searchways. The larger northerly searchway is indicated as being in a tarmac material and the other is hatched in a buff colour suggesting a different material, possibly unbound.
- 2.36 There are six disabled parking bays positioned centrally to the larger searchway in the easiest position for people with mobility difficulties to access the crematorium building.
- 2.37 The curving nature of the twin searchways are accentuated by three rows of hedgerows set to the same curve and effectively separating the two searchways. The hedgerows are missing in front of the six disabled parking bays as the space has been used to form the additional access room at the rear of the space.
- 2.38 Further formalisation of the car park is achieved through proposed curving tree lines behind two of the three hedgerows and other amenity tree planting in the open space around the car park.
- 2.39 The rain gardens collect surface water run-off from the southern, possibly unbound surface car park and the attenuation basin No. 1 from the northern, bound half of the car park. There is no immediate reference to other numbered attenuation basins on the Illustrative Layout Plan.
- 2.40 Taking into account the searchways, parking spaces, associated landscape and drainage areas the approximate space taken by the car park is 4,000m². There is no indication of the cut and fill works required to form the car park and achieve accessible grades to allow low mobility users to use it safely.

The existing consented schemes

2.41 The four consented schemes are summarised in RLC LVIA Table I below, their current status described and illustrative photograph provided. The photographs were taken on Site with the Appellant’s express consent and do not form part of the LVIA as they are not all from public locations.

RLC LVIA Table I – Status of current consented proposals

Consent ref and purpose	Current status on Site	Illustrative photograph
Change of use of the land to a natural burial ground and the erection of a reception building with associated access, parking and landscaping (DM/15/1035).	Implemented, but not operational. Some landscape planting has taken place, one gravel path built and a permissive path to St. Leonards Church layby formed. The small reception building is not yet constructed.	
Construction of a barn/workshop for the storage and maintenance of operational vehicles (DM/19/5100 and DM/20/1557).	Implemented, but not operational. The barn is constructed but not in use, there were drainage works ongoing near it on 9 March 2021.	
Re-siting and construction of a staff car parking area comprising 8 car parking spaces (DM/19/5107). Extant until 14 February 2023.	The car park area has been constructed in part but does not appear finished, it is the general area of the proposed overflow car park for this crematorium proposal.	
Re-siting of the consented chapel building with excavation and construction of new basement, internal site access road and associated landscaping (DM/18/0677). Extant until 29 May 2021. New permission (DM/21/0014)	The consented chapel has not been started in a meaningful way and no structure is apparently ‘out of the ground’ yet. The position of the approved chapel is marked on Site by a square of orange painted site hoardings. The hoardings appear to enclose a larger area than the	

Consent ref and purpose	Current status on Site	Illustrative photograph
until 8 March 2024.	consented chapel's footprint.	



Comparison of consented and proposed schemes

- 2.42 The change of land use to a natural burial ground is obviously Site wide. However the existing consented buildings and surfacing elements are grouped together in a small area to the immediate west of the Site entrance. They would all fit within a rectangular space approximately 60m long by 50m or 3,000m². If just the actual consented building and surfacing schemes were measured this equates to a total area of development of a 1,036m².
- 2.43 In looking at the overall space that the proposed crematorium building and associated car parking would fit into it equates to a trapezium 95m by 95m or just over 9,000m². The combination of increased car park surfacing (4,000m²) and larger crematorium building (1,580m²) totals to 5,580m².
- 2.44 In simple scale comparison terms the complex formed by the crematorium building and hard surfacing is three times larger than the consented proposals (9,000m² to 3,000m²). If a more concise measure of building footprints and surfacing is taken then the crematorium building and car park is at least five times the size of the existing consented schemes (1,036m² to 5,580m²).

DM/15/1035 – Natural burial ground landscape proposals

- 2.45 The landscape proposals for the consented natural burial scheme were prepared by Lizard Landscape Design and Ecology. The natural burial ground was to be phased in three parts;
- Phase 1 – Western half of the southern field around the reception building and chapel;
 - Phase 2 – Eastern half of the southern field; and
 - Phase 3 – The northern field.
- 2.46 The crematorium proposals retains the Phase 3 northern field area as the only natural burial area foregoing Phases 1 & 2 for the crematorium development.
- 2.47 The landscape proposals prepared by Lizard Landscape Design address Phase 1 – the western half of the southern field and show a much more naturalistic scheme concentrating on a mix of wildflower meadow and native woodland than the current proposals. As I reviewed the ecological and landscape proposals the following differences between the original natural burial ground landscape proposals and the current crematorium scheme became apparent;
- Smaller bell mouth turning off Turners Hill Road scaled at 16m compared to 25m.
 - Single smaller, more discrete car park to take a total of 22 cars instead of the 80 lot main car park of the crematorium;
 - Car park surfacing in a resin bonded gravel which would appear more low key and rural in character than the crematorium's tarmac access roads and car park;
 - No need for separate access roads and searchways as the reception building would be positioned at the end of the car park;

- The scale difference between the reception building and the crematorium building with or without its porte cochere;
- The reception building is set discretely on the Site rather than in a position half way down the slope to maximise scenic views as per the crematorium building;
- The reception building's construction is described as a traditional rural vernacular whereas the crematorium is flat roofed with a large skylight;
- The style of the planting proposals is considerably more natural with a greater emphasis on wildflower meadow planting and more open, diffused tree planting rather than large blocks of woodland planting.
- The proposed understorey and woodland edge planting is only set around the car park, reception building and site edge behind the translocated hedge rather than as a larger block running up to the maintenance building;
- There are no formally laid out landscape proposals such as the crematoriums curving hedges and circular garden of remembrance;
- The treatment of Footpath 68W is decidedly more open with tree and shrub planting to diffuse and filter views rather than screen out sight entirely that would occur with the twin hedgerows indicated on the crematorium proposals;
- The proposals only seek to plant half of Phase I leaving the north east portion of the field as existing rough grass. There would be a gradual landscape change as the wildflower and tree planting established and the small car park and reception building are screened out. This is in comparison to the crematorium building and supporting infrastructure that would require developing as a single phase to be functional. The crematorium change to the landscape would be quicker and more absolute.

2.48 In summary the original natural burial ground landscape proposals are more naturalistic, low-key and with its building set in a discrete location with associated screening. The proposals remain subservient to the landscape character of the Site and in keeping with the surrounding landscape that it is set in.

DM/17/1167 & DM/18/0677 (renewed as DM/21/0014) - Chapel with basement and access

2.49 The next planning application chronologically DM/17/1167 was for the chapel building. It is considered here with the subsequent application DM/18/0677 that sought to add a basement to it. The DM/18/0677 application has been renewed by planning application DM/21/0014 which is the most recent approval the Site has received.

2.50 The first chapel planning application was supported by further work from Lizard Landscape Design including;

- A Landscape Character and Visual Impact Assessment;

- A Landscape Strategy; and
 - An Ecological and Landscape Masterplan Strategy.
- 2.51 The proposals comprised of a new chapel constructed in a traditional rural vernacular and an additional 15 car parking bays with 12 of the bays in a separate adjunct to the approved carpark and three as an extension to the north east corner of the consented car park. The description on the plan changed from 'Proposed Tarmacadam Resin-bonded Gravel Car Park Surface Treatment' to 'Proposed Gravel Car Park Surface Treatment.'
- 2.52 The landscape strategy at §3.3 explains the landscape and ecological mitigation proposals associated with the chapel. They are presented as a digital extract below and are repeated on the Ecological and Landscape Masterplan drawing.
- *Make advantage of local topography; reduce ridgeline height through partial submersion / siting of proposals below site brow / plateau;*
 - *New hedgerow and tree planting to soften and filter internal views across the Site;*
 - *The proposed building should be enhanced with native tree and shrub planting to reinforce landscape structure and visually break ridgeline / building mass potentially made in passing views by vehicle users along Turners Hill Road;*
 - *The proposed car park should incorporate planting bays within the layout to further soften and diffuse views to the proposed building from the south;*
 - *Accelerate some grouped tree planting / shrub planting south of the public footpath as it emerges from the adjacent woodland block of Butchers Wood;*
 - *Northern and western boundary should be strengthened and defined through native tree and shrub planting to integrate built development into surrounding landscape structure and soften views of built form for users of public footpath;*
 - *Utilise natural materials within proposals to provide local contextuality (i.e. chapel building, parking area)*
- 2.53 Again like the initial natural burial ground application (DM/15/1035) the landscape mitigation proposals are seeking to minimise visual impact, diffuse views, break up the apparent scale of the car park and integrate the built development into the surrounding landscape structure.
- 2.54 The proposed chapel is shown closely associated physically with the consented reception building. There are two short connecting paths approximately 10m long from the car park and reception building to access the chapel.
- 2.55 The chapel proposals were refused by MSDC but allowed at Appeal. In their refusal notice dated 2 June 2017 MSDC cited adverse landscape and visual effects in their single RfR stating, 'The scale and design of the proposed chapel building and the extent of the hard standing car park would have an adverse impact on the landscape, contrary to (the then – author's note) Policies C1 and B1 of the Mid Sussex Local Plan, Policy THP8 of the Turners Hill Neighbourhood Plan and Policy DP24 of the draft Mid Sussex District Plan.'

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- 2.56 The Inspector did not agree with this conclusion and allowed the Appeal
- 2.57 Between the original chapel application and the most recent extension to the chapel basement consent the maintenance shed has been largely constructed on Site as discussed under DM/19/1500 below.
- Further landscape documents were provided in connection with the chapel basement application including the following;
 - Hard Landscape Materials Plan by Ecotecture the architects designing the chapel;
 - Site constraints and opportunities plan by Lizard Landscape Design – dated 10th March 2017;
 - Landscape Character and Visual Matters Report by Harper Landscape Architects – dated June 2017;
 - Landscape Plan by Harper Landscape Architects – hla281 101 dated 8th October 2018; and
 - Landscape Planting Plan near Chapel by Harper Landscape Architects – dated 10th October 2018.
- 2.58 The final approved plans have spaced the reception building and the chapel out so they are further apart and now require a connecting path of approximately 20m length instead of 10m. There is also a curving service road running through the separate car park extension up to the east elevation of the chapel building. This is presumed to possibly allow hearses to gain closer access to the chapel to transfer the body into the chapel. A turning head at the chapel's east end allows the hearse to manoeuvre for leaving after the ceremony.
- 2.59 The surfacing for the car park and service road has been defined further as a golden Cotswold gravel bound within plastic geogrids. The connecting paths would be laid in permeable tegula paving block – bracken in colour. The unbound gravel 'held' within geogrids is a low-key paving system able to provide a naturalistic surface for rural locations with the geogrids providing support for people with mobility difficulties who would normally struggle with a loose gravel surface.
- 2.60 The Landscape Plan by Harper Landscape Architects – hla281 101 dated 8th October 2018 is the closest representation of what recent landscape planting is visible on site. It summarises two phases of advanced planting - Phase 1 which concentrated on planting to the west end of the southern boundary in February 2017 (slight discrepancy between key that states 2016 and drawing 2017) and Phase 2 that planted in February 2018 and concentrated on the route of public Footpath 68W that runs to the north boundary of the southern field.
- 2.61 It is believed that it is this 'advanced planting' that is visible in parts on the Site at the moment and as included in some of the site panoramic photographs contained in Appendix B.
- 2.62 The overall effect of these combined proposals was to increase the size of the developed area with its two buildings, 37 car parking spaces and interconnecting path and service roads. The planting as instigated appears naturalistic in style and spread out along the north and south

boundaries of the southern field. The landscape treatment is attempting to assimilate the buildings with the rural landscape character of the area.

DM/19/5100 – Barn / Workshop

- 2.63 This outline application was approved by MSDC on 2 March 2020 with a landscape Reserved Matter being placed as the first of six Reserved Matters. The landscape Reserved Matter was subsequently discharged through application DM/20/1557 approved by MSDC on 6th July 2020.
- 2.64 The original planning application for the barn was supported by a landscape statement prepared by Harper Landscape Architects to update the LVIA assessments made by Lizard Landscape Design as they considered the landscape and visual effects of the chapel and modified car parking. It concluded at §6.3 of its Final Statement that the addition of the barn would,
- ‘Barn/workshop there would be incremental adverse impact as a result of the increased built form although this would be seen in the context of the Chapel and in time would be screened from PRoW 68 by the as-planted 600 trees located along the Site’s northern and western perimeter. The landscape character and visual change as a result of the barn would be not significant and therefore would not alter the previous landscape character and visual impact judgements put forward by LLDE (Lizard Landscape Design and Ecology) and HLA (Harper Landscape Architects).’*
- 2.65 The previous LLDE landscape and visual impact judgements suggested that there would be a short term, moderate, adverse landscape effects reducing to a long term, minor landscape effect. For visual receptors it was concluded that referred to short term, moderate, adverse visual effects.
- 2.66 The landscape proposals were considered by the MSDC Landscape Consultee – Mrs Virginia Pullan of West Sussex County Council who acts as landscape consultee on schemes that may have overt landscape effects. She passed two sets of comments with the first concluding that the maintenance barn and workshop would be acceptable subject to planning conditions.
- 2.67 Detailed planting proposals prepared by Harper Landscape Architects were submitted as part of DM/20/1557 and comprised a planting plan HLA 359/01 Rev B dated 29th April 2020 that showed naturalistic planting around the wider complex of barn, chapel, reception building and associated car park.
- 2.68 The planting species indicated are predominately smaller scrubby stock such as hazel, holly and hawthorn with a fewer number of larger canopy trees of hornbeam and oak set around the consented complex. This planting would not have screened out the buildings from view from the wider Site or from Footpath 68W.
- 2.69 The treatment of Footpath 68W is also indicated on HLA 359/01 Rev B with it marked as receiving two types of wildflower seed mix and patches of indigenous mixed planting to reinforce the existing advanced planting from February 2017 and 2018 (shown as blue blocks on the plan).

2.70 It is unclear if any of this approved planting has yet been undertaken.

DM/19/5107 – Movement of staff parking area

2.71 The movement of the staff car parking area application was consented on 14 February 2020 and was fully titled as 're-siting and construction of staff car parking comprising 8 parking spaces' on the decision notice.

2.72 In effect it is an extension by eight parking lots to the existing consented 37 car capacity of the associated with the chapel and reception building taking the final approved total to 45 spaces. Eight staff spaces seems a high number for a natural burial ground facility that was anticipated to employ three people³. It is twice the staff parking for the proposed crematorium.

2.73 The car park extension would be set to the west of the consented reception building which removes it from being at the very end of the car park. It also extends the car parking closer to the southern hedged boundary of the Site.

2.74 The car park surfacing would be an extension to the geo-grid fixed unbound gravel system that is used in the rest of the car park. This is described as a sensitive, permeable surface in the supporting landscape statement.

2.75 Likewise the same landscape statement at §2.11 Bullet 2 describes the car park extension as having 'indigenous species screening planting (with a high evergreen content) to the whole perimeter of the relocated car parking spaces.' These evergreen species are not evident on the Harper Landscape Architecture plan hla 359 01 Rev B as it a mix of species stating 123m² Indigenous Mix Planting.

2.76 The landscape effects of extending the car park for the eight staff spaces were covered off in the same Harper Landscape Architect's landscape statement provided to jointly address the maintenance barn/workshop application (DM/19/5100). They were concluded as not changing the landscape and visual effects for the area as considered in the Lizard Landscape Design and Ecology LVIA.

Section 3 Crematorium and consented proposals Summary Box

2.77 As the discussion of the proposed development and the existing consented works is lengthy a summary box is provided.

- a. The crematorium proposals are considerably larger than the consented works and would take up the larger part of the Site's southern field.
- b. The crematorium proposal has been analysed to understand its access elements, ceremonial and setting elements and functional elements.
- c. Further comments have been given on the car parking which is understood to total 115 spaces

³ Application form for DM/17/1167 – Chapel building

and building arrangements.

- d. It is considered that the crematorium buildings would be imposing its own development form and style on the Site rather than working with the Site's existing character as the natural burial ground proposals seek to do.
- e. There has been an extensive number of applications since the granting of the planning consent for use of the land as a natural burial site. All these applications have increased the scale of development and associated infrastructure on the Site.
- f. In simple numeric terms the original natural burial site proposal has increased the following items;
 - Number of consented schemes – From one to four;
 - Buildings – From one to three;
 - Building Size – Both two subsequent buildings are larger than the first reception building;
 - Car parking spaces – From 22 to 37 and finishing at 45 number which is twice the original consented number;
 - Number of car parks – From one to three; and
 - Number of service roads – From one to three.
- g. The increased scale of the built infrastructure has reduced the area of available land for the natural burial ground.
- h. This type of incremental change has increased the scale and extent of development within the wider natural burial site but it is still relatively compact and small in overall size. Its position and landscape treatment across the various proposals has been low-key and allows the remainder of the southern field to be rough grassland. The proposals are considered as acceptable in the surrounding landscape.
- i. The crematorium proposals have a more formalised landscape arrangement, are larger in scale and would deliver a more intensively developed landscape than the current consented natural burial proposals.

3.0 Landscape planning policy and guidance

Relevant documents

- 3.1 The Local Development Plan comprises the Mid Sussex District Plan (adopted March 2018) and Turners Hill Neighbourhood Plan (made March 2016).
- 3.2 In addition there are a number of applicable design and landscape management documents that are listed after the planning policies.
- 3.3 The planning policies and guidance that MSDC consider the proposals to be in conflict with have been emboldened in the various lists.

Planning Policy

- 3.4 From the Mid Sussex District Plan the following policies could be considered applicable;
- **Policy DPI2 – Protection and Enhancement of Countryside**
 - Policy DPI3 – Preventing Coalescence
 - **Policy DPI6 – High Weald AONB**
 - Policy DPI7 – Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC)
 - Policy DP22 – Rights of Way and other Recreational Routes
 - **Policy DP26 – Character and Design**
 - Policy DP37 – Trees, Woodland and Hedgerows; and
 - Policy DP38 - Biodiversity
- 3.5 From the Turners Hill Neighbourhood Plan there appear to be three policies that have a landscape or environmental dimension;
- **Policy THP8 – Countryside Protection**
 - Policy THPI2 – Visual Perspective
 - Policy THPI3 – Business Development
 - Policy THPI7 – Rights of Way

Design Guidance and Landscape Management Objectives

- 3.6 MSDC have the Mid Sussex Design Guide – adopted November 2020 is a Supplementary Planning Document (SPD). The potentially applicable design principles from its Section 3 – Establishing a Structure set below and again those cited in the Reason for Refusal are emboldened.
- **DG3 – Work with the Site’s natural features and resources**

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- DG4 – Establish a landscape and green infrastructure network
 - DG5 – Water features and sustainable drainage systems
 - DG6 – Design to Enhance Bio-diversity
 - **DG7 – Respond to topography and strategic views**
 - DG8 - Establish a Clear Movement Network that Connects with the Surrounding Area
 - DG9 – Reduce reliance on the private car
 - DG10 – Anticipate future development
 - **DG11 – Respond to the existing townscape, heritage assets and historic landscapes.**

3.7 The High Weald AONB has a Joint Advisory Committee (JAC) of representatives from the Local Authorities who have land in the AONB. The current High Weald AONB Management Plan 2019-2024 has a series of management objectives set against different features of natural beauty within the AONB. The most pertinent to the Site and the planned proposals are from the Field and Heath section of management objectives.

- **FH2 - To maintain the pattern of small irregularly shaped fields bounded by hedgerows and woodlands.**
- **FH3 - To enhance the ecological function of field and heath as part of the complex mosaic of High Weald habitats.**
- FH4 - To protect the archaeology and historic assets of field and heath.

4.0 Landscape baseline

Introduction

- 4.1 The landscape baseline involves the identification and evaluation of existing landscape receptors. The term receptor is used to describe recognised character areas, the contextual area to the Site, the Site itself and individual landscape characteristics of the Site such as existing trees and boundaries.
- 4.2 After their identification, landscape receptors are assessed to determine their sensitivity. This is determined by combining judgements of their susceptibility to change brought about by a development of this specific type and the value which is attributed to the receptor. The full methodology is presented in Appendix A to this LVIA.

Identification of landscape receptors

- 4.3 In addition to the Site itself a desktop review identified a number of landscape receptors, within a 3km radius Study Area. They are presented in three categories;
- Existing landscape character areas;
 - Landscape character and characteristics of the Site; and
 - Contextual landscape to the site.

Existing landscape character areas

- 4.4 These are generally defined by existing published landscape character assessments working from a national level down to more local characterisation studies. They consist of the documents summarised in RLC LVIA Table 2 below with relevant extracts set in LVIA Appendix C – Landscape Character Information.

RLC LVIA Table 2 – Schedule of existing published landscape characterisation information

Document / Publisher	Applicable Area / Type
NCA 122 – High Weald by Natural England – December 2013	Site lies within overall High Weald national character area along with the adjacent High Weald AONB.
Sussex Historic Landscape Characterisation Study by West and East Sussex County Councils, Brighton and Hove Council and English Heritage – August 2010.	Produced as desk-based analysis of historic landscape features such as field patterns. This HLC concentrates on periods of historical woodland, agricultural and industrial usage of the landscape. It contains little useable information on the Site and surrounding area.
A Strategy for the West Sussex Landscape by West Sussex County Council – October 2005.	The Site falls within the HWI – High Weald with this document providing more strategic landscape management guidance than baseline character information.
A Landscape Character	The Site falls within Area 6 – titled High Weald. The

Document / Publisher	Applicable Area / Type
Assessment for Mid Sussex by MSDC – November 2005.	landscape type is Wooded Ridges and Valleys.
Capacity of Mid Sussex District to Accommodate Development Study – July 2007.	The Site falls within Area 5 – Majors Hill High Weald and is ranked as having Substantial Value and Substantial Sensitivity leading to an overall assessment of Low/Negligible capacity for strategic development.
Mid-Sussex Capacity Study – by LUC on behalf of MSDC – June 2014	This study built upon the July 2007 capacity study and added five new areas of investigation. The Majors Hill area and all character areas to the west of Turners Hill were still deemed to have a Low capacity for development. This is the lowest rating on a 5 point scale.
Turners Hill Neighbourhood Plan (Made Version) by Turners Hill Parish Council – March 2016.	No landscape characterisation information but a useful map of Ancient Woodland and plantation woodland on previous Ancient Woodland is included.
Turners Hill Village Design Statement by Turners Hill Parish Council - 2011	No specific landscape characterisation material but useful historic background to the village and wider Parish.
High Weald AONB – as a designated national landscape	The Site falls outside of the actual designated landscape but forms the immediate setting to it and shares the same fundamental landscape characteristics as the adjacent AONB
High Weald AONB Landscape Character Assessment by High Weald JAC – November 1994	Site appears on the cusp between the Western High Weald and Upper Medway landscape character areas.
High Weald AONB Management Plan 2019-24 by High Weald JAC – 2019	Landscape characteristics of field and heath is given as a precursor to description of landscape management objectives.

- 4.5 It is recognised that the scale of the proposals is such that they will have negligible effect on all of the character areas listed above. They are therefore scoped out of any further assessment with the exception of the High Weald AONB that as a nationally designated landscape is of such importance and proximity to the Site that it is kept in the ongoing LVIA process.

Review of Mid-Sussex Landscape Character Area 6 – High Weald applicability to the Site

4.6 As good practice the applicability of the 16 key characteristics of the Mid-Sussex Landscape Character Area 6 – High Weald (MSLCA6) has been undertaken to ensure it is applicable to the Site. The key characteristics are listed out in RLC LVIA Table 3 below and commentary is supplied against each to summarise their applicability. A simple colour Red – Amber – Green for not applicable – partly applicable – applicable is used. A review of the table shows that 11 out of the 16 key characteristics are applicable and the Site is accurately described as part of the High Weald character area.

RLC LVIA Table 3 – Review of High Weald key landscape characteristics

Key characteristic	Applicability to Site and Surroundings
Wooded, confined rural landscape of intimacy and complexity, perceived as attractive, locally secluded and tranquil.	The Site is not wooded but the general area is and displays the confined rural intimacy, closed in many views with attractive visual amenity and partly secluded and tranquil.
Complex sandstone and clay hilly landscape of ridges and secluded valleys centred on the western end of Forest Ridge of the High Weald plateau deeply cut by numerous gill streams and with sandrock crags.	The Site and the village of Turners Hill is sited on the prominent Forest Ridge and the east side of the site falls away to a gill stream that flows through Butchers Wood. No sandrock crags are visible on or around Site.
Headwater drainage of the River Medway originates here, the southern part of the area drained by the deep, sinuous gill streams running to the River Ouse.	The gill stream in Butchers Wood and the stream that flows west to east through the small valley to the north of the Site appear to flow to the Medway headwaters rather than the River Mole.
Long views over the Low Weald to the downs, particularly from the high Forest Ridge.	Long views exist towards the Low Weald and further to the Surrey Hills AONB from Site and higher up the ridge in the neighbouring AONB.
Includes major reservoir at Ardingly and adjoins Weir Wood Reservoir.	The wider area does but these exert no influence upon the Site on study area.
Significant woodland cover, a substantial portion of it ancient, including some larger woods and a dense network of hedgerows and shaws, creates a sense of enclosure, the valleys damp, deep and secluded.	There is significant woodland cover to the east and north of the Site with Butchers Wood to the east being Ancient Woodland. Hedges and shaws connect some of these woods and run along Turners Hill Road.
Pattern of small, irregular-shaped assart fields, some larger fields and small pockets of remnant heathland.	The fields are medium size at site with a mix of smaller and larger fields in the vicinity. The southern field is irregular in shape and the northern field more regular after being forged from a larger field. Possibly assarted.
Pockets of rich biodiversity concentrated in the valleys, heathland,	Butchers Wood next to the Site appears rich in biodiversity and the ecological value of the Site is

Key characteristic	Applicability to Site and Surroundings
and woodland.	increasing through natural regeneration.
Dense network of twisting, deep lanes, droveways, tracks and footpaths.	Turners Hill Road is not twisting as it traverses straight up the Forest Ridge but it is partly sunken near Site, Footpaths run across Site and connect it to the wider landscape.
Dispersed historic settlement pattern on high ridges, hilltops and high ground, the principal settlements East Grinstead and some expanded and smaller villages.	Turners Hill is set high on the Forest Ridge and St Leonards Church at the highest local position which is another High Weald characteristic.
Some busy lanes and roads including along the Crawley–East Grinstead corridor.	Turners Hill Road is fairly busy as it connects through to Crawley and the M23.
London to Brighton Railway Line crosses the area.	Not near Site and exerts no influence on the study area.
Mill sites, hammer ponds and numerous fish and ornamental lakes and ponds.	No such ponds have been set on the sloping sides of the ridge at the Site or its immediate contextual area.
Varied traditional rural buildings built with diverse materials including timber framing, Wealden stone and varieties of local brick and tile hanging.	No buildings at Site but Tulleys Farm buildings are traditional in style and many examples in Turners Hill itself.
Designed landscapes and exotic treescapes associated with large country houses.	None at the Site or immediate surroundings but Worth Abbey lies off to the south west but exerts no influence.
Visitor attractions include Wakehurst Place, Nymans Gardens, the South of England Showground and the Bluebell Line Steam Railway.	None of the listed attractions exert an influence over the Site and study area but the adjacent Tulleys Farm does.

Landscape designations

- 4.7 The High Weald AONB is set opposite the Site to the south. This is a national level of landscape designation and in more recent times AONB's have been referred to as a National Landscape. There are no other landscape designations in the vicinity of the Site.

Landscape capacity studied

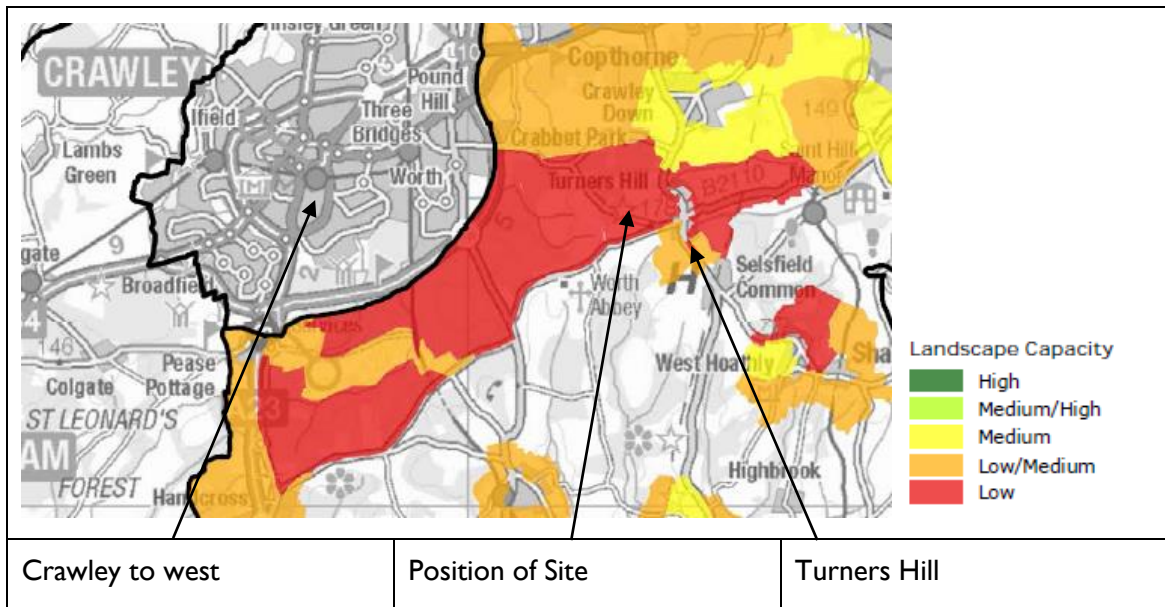
- 4.8 Two landscape capacity studies have been conducted in Mid-Sussex in 2007 and 2014. The latter more recently as part of the evidence base for the Mid-Sussex District Plan. The Site is located into the Majors Hill Area in both studies. They found there to be Low landscape capacity to accommodate strategic development in Majors Hill as summarised in RLC LVIA Table 4 below.

4.9 The apparent landscape capacity appears to increase between the 2007 HDA study and the 2014 LUC study with the capacity judgement moving from Low / Negligible to Low. This is actually a result of LUC using a five point scoring scale instead of seven point scoring scale as used by HDA. The judgement Low is the lowest of all in the LUC five point scale.

RLC LVIA Table 4 – Landscape Capacity of Majors Hill Landscape Character Area

Study	Landscape Sensitivity	Landscape Value	Landscape Capacity
HDA - 2007	Substantial	Substantial	Low/Negligible
LUC - 2014	Substantial	Substantial	Low

4.10 When mapping is used to illustrate the areas with Low landscape capacity it is evident that the stretch west of Turners Hill running towards Crawley approximately on the route of the Forest Ridge is considered all to have Low landscape capacity for major development. The digital extract below is from LUC - Map 4.2 and shows the low landscape capacity areas in red.



Landscape management objectives

4.11 The Mid Sussex Landscape Character Assessment –November 2005 and A Strategy for the West Sussex Landscape by West Sussex County Council – October 2005 both contain general landscape management policies that are provided to assist plan making and decision taking.

4.12 The MSLCA6 landscape management objective is set below as a digital extract.

Management Objective

Conserve the rich mosaic of woodland and other habitats and the intimate nature of the agricultural landscape, the high level of perceived naturalness of the area including its rural, tranquil qualities, and the unobtrusive settlement pattern throughout much of the area.

- 4.13 A Strategy for the West Sussex Landscape places the Site in landscape character area High Weald I, abbreviated to HWI on mapping. The document sets vision statements for each larger landscape character area in this case the High Weald part of the county. Perhaps most applicable from this study is a set of Landscape Guidelines for commercial and industrial development including rural diversification presented at page 44 and included as LVIA Appendix C.

Landscape characteristics of the Site and surrounding contextual area

- 4.14 RLC LVIA Table 5 was prepared after my visit to Site in March 2021. It addresses the physical features, land cover, man-made elements and perceptual qualities of the Site and surrounding area that combine to make up the overall character of both.

RLC LVIA Table 5 – Landscape Characteristics at the Site and in the surrounding landscape

Characteristic	At the Site	In the surrounding contextual area
Physical features		
Geology	No evidence of geological features.	No evidence of geological features.
Soils	No open soils on Site but likely clay soils as drift geology over sandstone as base geology.	Ploughed soils in nearby fields indicated a brown, clay based loam that is relatively fertile and stone free used for maize, cereal, beet and pumpkin production suggesting it is a more fertile area of the High Weald capable of supporting mixed crop production rather than just grazing.
Elevation (mAOD)	The eastern end of the southern side of Site as it climbs up the ridge is the highest elevation at 170mAOD and falls away to the northern following the local valley to a low point of 134mAOD at the north east corner of the northern field. This is a fall of 36m over approximately 450m which is a general 8% gradient of 1:12.5 fall.	The highest elevation in the area is 178mAOD at the position where the Church of St Leonard is located to mark its communal and religious importance. There is also a high ridge on the opposite north side of the valley to the north of Tulleys Farm buildings that sits at 155mAOD. The low point is the stream that flows past the northern field and onto in Turners Hill where its elevation is 122mAOD.
Landform	A sloping field that falls in a generally constant fashion from the higher southern boundary towards the lower northern boundary. There is a sense of local elevation to the southern side of the field and an ability to understand that the site forms one side of a small valley. The site also falls away more sharply to the east into the gyhll woodland 'Butchers Wood'.	The sense of being in a small valley is aided by sight to the 'upslope' to the north of the Site even though the valley seems 'dry' with no visible watercourse. The valley carries on rising to the south to form a local ridge in the adjacent AONB. The ridge carries on to the east of the Site but there is a sense of it falling away to the west down towards Major's Hill.
Hydrology	There are no evident watercourses or features such as field ponds on the Site.	Local topography leads surface water drainage to the stream at the centre of the valley which flows from west to east and runs to form the headwaters of the River Medway.
Land cover		



Characteristic	At the Site	In the surrounding contextual area
Land use	The land use at the site is as per previous planning consents with regard to a natural burial ground with associated ancillary facilities such as a car park and maintenance barn. The natural burial ground is not yet operational. The start of construction of the consented chapel building is located to the west of the Site marked by a rectangle of solid hoardings.	Mix of agricultural land-use to the south with a beet crop being grown in the AONB field to the south of Turners Hill Road. To the south west is Turners Hill Cricket Club's ground and pavilion, Tulleys Farm's seasonal events area and car park is set to the west and north west of the Site. Immediately north are arable fields and to the east Butchers Wood which is an Ancient Woodland.
Vegetation	<p>There are no agricultural crops in production on the Site and it is not grazed or cut pasture. Rather it is a combination of rough grassland with natural regeneration scrub towards the centre of the southern field and regenerating out from Butchers Wood in the north field.</p> <p>There is an outgrown hedge to the southern field's Turners Hill Road boundary. The separating hedge between the north and south field is patchy and intermittent but with some older hedgerow standard trees. The boundary to the Site's northern field is generally open but its eastern side is enclosed by Butchers Wood.</p> <p>Recent tree and scrub planting near Butchers Wood and Turners Hill Road appears sparse and unmanaged.</p>	South of the Site lies the tree line of Turners Hill Road that is embanked at this point, Beyond that lies the crop field that is currently growing beet. East of both fields lies Butchers Wood and the shaw that runs up from it to meet Turners Hill Road. To the north are the ploughed fields associated with Tulleys Farm whilst immediately to the Site's west the sloping field has been turned into strips of rolled grass and gravel to form the car park for Tulleys Farms seasonal events such as the previous Maize Maze, pumpkin picking and Halloween Shoktober event.
Tree cover	<p>There are mature trees set as hedgerow standards in the boundary hedge between the Site's two fields and towards the eastern end of the Turners Hill Road hedgeline.</p> <p>There is developing scrub containing young trees in the centre of the southern field and to the east of the northern field. Recent tree and scrub planting near Butchers Wood and Turners Hill Road appears sparse and unmanaged.</p>	Butchers Wood Ancient Woodland to the east of the Site is the largest piece of woodland in the immediate vicinity to the Site. It is an attractive piece of woodland with many trails as well as the official 68W Footpath suggesting its use for play and walking. Butchers Wood runs as a shaw up to the tree line that then runs along both sides of Turners Hill Road. Another tree line is set adjacent to Paddockhurst Road in the AONB but the fields and adjacent cricket pitch are more open. Woods stand to the north of Tulleys Farm.
Ecological character	Good ecological mosaic offered by combination of rough grassland, developing scrub, mature hedgerows and older hedgerow standard	Larger scale mosaic of woodland, fields, stream valleys and interconnecting shaws and hedgerows is also good. It is not benefit



Characteristic	At the Site	In the surrounding contextual area
	trees. Lack of recent active agricultural management has improved its ecological character.	from any local or national designations but still s considerable ecological value largely due to the connectivity of woodland.
Field patterns	Two medium scale fields with the southern more irregular in shape. The northern field has been part of a larger field. Historic maps research indicates they have not changed in shape or size since early editions of 1895-96.	Generally small, irregular field sizes in the vicinity and across the valley from the Site. The fields in the AONB are larger and have experienced some amalgamation post WW2 most likely to aid food production and cater for larger mechanised farming processes.
Man-made elements		
Built elements	<p>There is one of the three consented buildings on Site at the moment and that is the maintenance barn / workshop situated to the western end of the southern field. It does not appear operational with its main roller door not fitted.</p> <p>Solid site hoardings have been erected around the consented chapel location. They are striking in the view given their obvious orange colour and large promotional images placed on them.</p> <p>The sub-base for the consented car parks has been installed but it is unclear whether this area of hardstanding if for all or some of the proposed natural burial ground car park.</p>	<p>There are some well separated buildings in the surrounding landscape. To the south west the Turners Hill Cricket Club pavilion stands on the far side of the pitch from the Site. A white painted shipping container is positioned discretely behind the pavilion presumable to house the wicket roller seen operating during the site visit</p> <p>To the west are the permanent dwellings, workshop and leisure facilities of Tulleys Farm set in a more historic farmstead arrangement. To this can be added what I have termed 'visitor pavilions' in the events field and car park.</p> <p>To the north no dwellings are evident whilst further to the east the Church of St Leonard is characteristically located at the highest point of the ridge on which Turners Hill itself is sited.</p>
Architectural character	Timber clad, new but unfinished.	Mix of buildings styles with red brick, render and stone all evident in more permanent buildings and timber and panel construction in the seasonal pavilions at Tulleys Farm.
Boundaries	Predominately hedges and shaws (narrow woodland strips). The	Like the Site the local fields are predominately separated by rough



Characteristic	At the Site	In the surrounding contextual area
	<p>hedge to the south that was translocated to form the site entrance appears patchy and not as full as others around Site.</p> <p>The separating hedge between the Site's two fields is intermittent and lacking a managed form. The strongest boundary is to Butchers Wood and shaw to the east.</p> <p>The openness of the southern field's western hedge means that Tulleys Farm's car park and seasonal buildings are evident.</p>	<p>hedges, shaws and woodland. The beet field in the AONB appears to be an amalgamated field and in space terms flows into the open land of the Turners Hill Cricket Club. There is noticeable timber fencing, gates and signage associated with the exits from the events car park.</p> <p>Generally the hedges in the area are tall and appear irregularly maintained. The only hedge that appears to be more frequently cut and shaped is the one near the entrance to Tulleys Farm.</p>
Perceptual Qualities		
Views	More open views and the Site's aspect is towards the small valley bottom and side to the north. However views are also available south across the Site towards the AONB and west / north west to the Tulleys Farm seasonal events area and car park.	Longer views to the north towards the Downs and west towards Crawley.
Scale	Small to Medium scale largely derived from field sizes.	Small intimate scale of wider landscape with patchwork of woods, fields and small valleys.
Enclosure	Enclosure to south form Turners Road tree belt and to the east by Butchers Wood. Site is generally open even with the developing scrub areas.	Mix of enclosure and open views with woods and tree lines enclosing views to then suddenly open up a scene across a valley or elevated from one of the High Weald's ridges.
Variety	Fairly uniform – rough grass and boundary hedges and trees.	Varied with mix of fields, woods, shaws, hedges and rolling topography.
Texture	Disturbed – from lack of agricultural management and as a result of recent construction activities.	Rich – from variety of woods, pasture fields and crops.
Colour	Rich – grass, deciduous hedgelines, large deciduous trees and scrub areas.	Rich – grass, deciduous hedgelines, large deciduous trees and scrub areas plus ploughed earth.



Characteristic	At the Site	In the surrounding contextual area
Movement	Little movement on Site limited to users of footpath 68W. Ability to see taller vehicles on Turners Hill Road and all vehicles through access gap.	Traffic movement on Turners Hill Road is the greatest source of movement and agricultural management of surrounding fields. Summer activity at the cricket club and seasonal activity at Tulleys Farm.
Unity	There is a sense of difference between the Site's northern and southern fields (settled v disturbed) but an overall unity with the surrounding landscape.	Unified character of rural area more fragmented along M62 corridor with greater mix of landscape features evident.
Naturalness	The Site appears predominately rural in character which is not natural in the sense of wildness or limited human management.	The surrounding area also appears rural in character which is not natural in the sense of wildness or limited human management.
Darkness	Site is dark with passing lights from vehicles on Turners Hill Road.	Generally dark with the exception of farmsteads and Turners Hill lights.
Tranquillity	No sense of tranquillity in the southern field but some sense of tranquillity in the lower northern field.	The parts that are away from Turners Hill Road display some relative tranquillity particularly the route of Footpath 71 that passes through woodland north of Tulleys Farm.

- 4.15 The analysis in this process indicates that the Site displays enough of the High Weald characteristics that its landscape characterisation as part of the wider High Weald landscape remains accurate. It appears as an area of rural landscape even though its land use is not agricultural. When considered as a whole the Site's two fields contribute positively to the surrounding landscape and appear in keeping with the immediate and wider contextual landscape even in their current landscape condition.



Landscape condition

- 4.16 The Site's southern field currently appears disturbed with the sense of stalled development. This disturbed character comes from the half-finished maintenance shed, the obvious site hoardings, the unsurfaced car park and concrete 'lego' blocks that are restricting vehicle access at the Site's main access. This sense of inactivity is increased by the fact that there is no apparent agricultural use of the land compared to nearby working fields. The Site is of course no longer classed as agricultural but it will be judged against the nearby landscape that predominately is.
- 4.17 This reduces the apparent landscape condition of the Site's southern field but it should be remembered that it is a temporary, transitional state and the fundamental landscape characteristics of topography, boundary hedges and tree cover, rough grass land and relationship to the surrounding landscape are still clearly evident and characteristic of the wider High Weald landscape character. The current disturbed landscape condition would be reversed on completion of the consented development and more active management of the Site as a natural burial ground.
- 4.18 The Site's northern field that is consented for Phase 3 of the natural burial ground still appears as an agricultural field set between the working fields next to Tulleys Farm car park and Butchers Wood. It does not hold any of the incomplete development forms which adds to its rural appearance.

Landscape management at Site

- 4.19 At the time of the Site visit there appeared to have been no active landscape management on the Site for some time.
- 4.20 This observation was based on the facts that natural regeneration scrub had started to colonise the centre of the southern field suggesting that there had been no grass land management. It was also noted that the areas of planting on Site from February 2017 and 2018 appear not to be actively managed through obvious weeding, gapping up or re-fixing of tree guards. The planting did not appear to be thriving after at least three years in the ground with competition from surrounding grass sward most likely the reason why.
- 4.21 Hedge management is a typical agricultural practice completed in cycles so that a hedge does not start to take over productive land in a field or become too high to easily manage. With mechanisation and tractor mounted flails there has been a tendency to overcut hedges which reduces their contribution to both landscape and ecological value. When land falls out of agricultural production the cycle of hedge management tends to cease and the quality of hedges decline.
- 4.22 In the High Weald landscape hedges do not tend to be tidy and over pruned but with a combination of shaws and other woodland areas. It is this character that helps to dress the High Weald landscape and create its attractive aesthetic of a landscape with small, wood fringed fields.

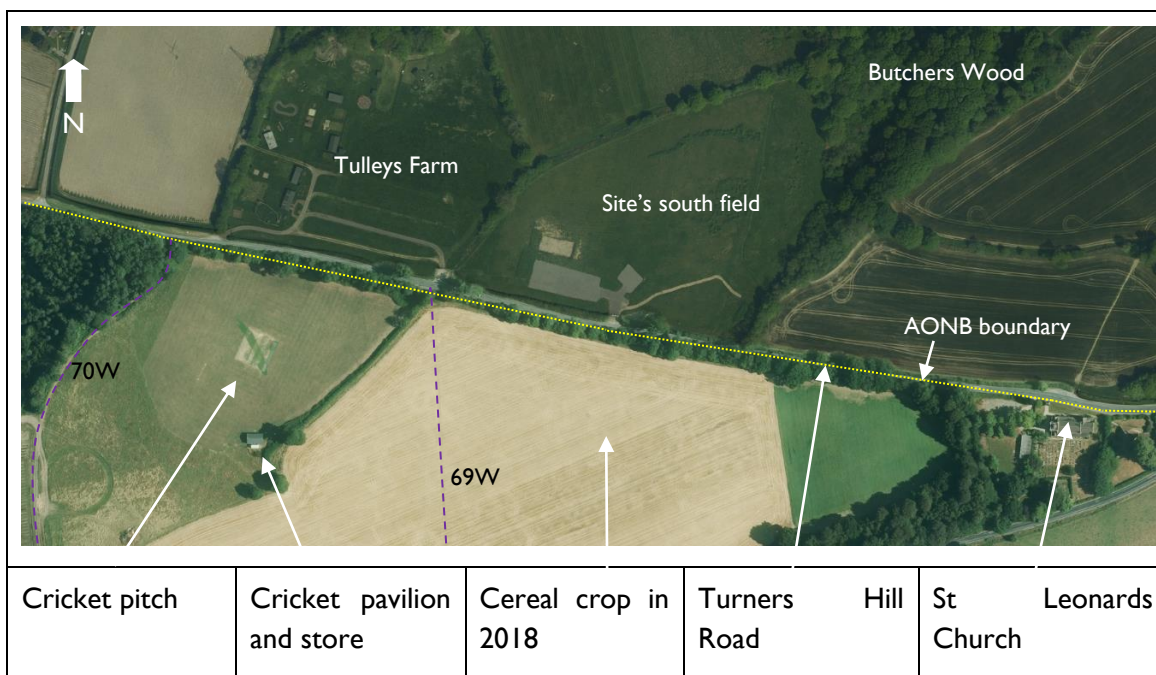
4.23 There currently does not appear to be any active hedgerow management around the Site's hedged boundaries which are most notable in its southern field. There are gaps and open sections and the hedges, particularly the one between the Site's fields and next to Footpath 68W is losing its presence in the landscape. It is noted that hedges are proposed to be reinstated either side of Footpath 68W by the proposed crematorium development.

Character of the nearby AONB landscape

4.24 The High Weald AONB literally lies on the other side of Turners Hill Road from the Site's southern field.

4.25 AONB and other national designated landscape such as National Parks require a 'hard boundary' on a map for planning and other management purposes. Boundaries tend to be drawn at recognisable and immovable boundaries such as roads, footpaths and rivers. Their landscape character rarely changes at their boundary but rather flows out into the surrounding area which shares many, if not all of the designated landscape's characteristics. These surrounding areas then become the important setting to the designated landscape as discussed below.

4.26 The AONB land near to the Site is illustrated on the aerial photograph below. It is set to the south of the dashed yellow boundary line following Turners Hill Road. The points show the land-use and activity going on in the AONB indicating it is largely agricultural in landscape character terms even with the cricket pitch to the south west.



4.27 The topography keeps rising up to the south offering longer elevated views to the north. The immediate AONB field shown above planted with a cereal crop in 2018 is larger compared to many in the High Weald landscape. It's largely triangular form is shaped by the two roads

Turners Hill Road and Paddockhurst Road running to an apex just beyond St Leonards Church.

- 4.28 This placing of roads, settlements and especially churches on ridgelines in the High Weald is key characteristic of the High Weald landscape. Turners Hill itself is placed on a prominent ridge known locally as the Forest Ridge.
- 4.29 The Turners Hill Road boundary has a banked tree line running along it giving the road a slightly buried, holloway character which again is a characteristic of routes through the High Weald. The Paddockhurst Road is set with a strong beech tree line as a shaw woodland to its north.
- 4.30 The tree line set on the bank on the south side of Turners Hill Road acts as a separating feature between the AONB and the Site and other areas to the north of the road. This is illustrated in the Appellant's LVIA summer photography from Footpath 69W shown as VP 12 and VP13 in the Indigo LVIA.
- 4.31 The Turners Hill Road tree line is also relatively full in winter months as well as illustrated on photographs held in the RLC LVIA – VP12, VP12a and VP13. There are a few gaps and filtered views to the Site is possible but no open views exist.

AONB setting

- 4.32 The Site's and particularly its southern field act as the immediate setting to the High Weald AONB. Also in the immediate setting are Tulleys Farm activity field and car park and the arable field to the south of Butchers Wood. This is a statement of simple geographic fact.
- 4.33 AONB setting also extends wider to take in the landscape of the rest of the valley that runs up to the north of the Site and Tulleys Farm. Beyond this point there is no strong landscape link with the AONB land even though it shares the same landscape characteristics.
- 4.34 These setting extents are shown on the landscape survey and analysis drawing at Figure 3 in RLC LVIA Appendix B - Illustrations.

Comparison of the Site and the AONB's landscape character

- 4.35 There is little difference in terms of character between the AONB and the Site. Land-use may be different but overall landscape character is not.
- 4.36 They share similar characteristics including;
- Being part of the same valley side running down to the north;
 - Similar tree lines either side of Turners Hill Road;
 - Strings and ribbons of woodland shaws and small blocks of woodland;
 - Presence of open fields albeit used for different purposes;
 - The gyhll woodland of Butchers Wood with land falling away to the east; and
 - Views out to open aspect to the north.

-
- 4.37 In using a theoretical walker on Footpath 69W crossing over Turners Hill Road from the AONB onto the Site and following Footpath 68W they will not notice a fundamental difference in landscape character. They will notice a difference in land-use with Tulleys Farm car park and the Ste's maintenance shed building but not a whole different landscape character.
- 4.38 If the walker crosses Turners Hill Road in the opposite direction they will not suddenly experience a dramatic new landscape character, or more impressive landscape walking into the AONB.
- 4.39 As expected there is no sign saying, 'You Are Now Leaving / Entering the High Weald AONB.' They appear and are understood as one landscape character area with the AONB boundary drawn along a convenient geographic feature.

Valued landscape as defined in current NPPF

- 4.40 Currently the Site is not considered a valued landscape, but its landscape context namely the High Weald AONB is a 'valued landscape' as per the reference at §170a because of its national landscape designation. This is a matter of common ground between parties.
- 4.41 The Site was not considered a valued landscape in the landscape consultation response provided by Ms Pullan to this application or during the previous consented planning applications. She did caveat her comments slightly at her §2.14 of her final consultation response by stating, '*Whilst the site would be unlikely to be considered valued landscape in the context of the NPPF it is assessed to be of high sensitivity by the LVIA*' (By Indigo Landscape Architects – author's note).'
- 4.42 There is no prescribed process to define whether a non-nationally designated landscape is a valued landscape. Although the Landscape Institute has recently published for consultation draft guidance to assist landscape practitioners and planning authorities alike to understand what a valued landscape is and how to define one in the English planning system. This document is Technical Guidance Note (TGN) 02/21 – titled 'Landscape Value and Valued Landscapes' and was put out to consultation in January 2021. It is not yet adopted as either guidance or best practice by the Landscape Institute.
- 4.43 There have been well publicised Court of Appeal decisions that have assisted to a certain extent. The 'Stroud' decision in 2014 (Gladman Developments Ltd v Stroud District Council) where Justice Ouseley determined that a valued landscape has to have 'demonstrable physical attributes' to lift it above the ordinary and not just popularity.
- 4.44 In addition a site that benefits from views to and from an AONB does not immediately become a valued landscape as this would act to unduly restrict development across wide tracts of visible land.
- 4.45 There appears to be three interpretations to determining whether a none nationally designated landscape is valued under NPPF170a;

- *Subjective interpretation* – through the use of a GLVIA3 Box 5.1 (and the emerging Table I of TGN 02/21) assessment to establish if any demonstrable physical or cultural landscape features apply at a site to make it a valued landscape;
- *Objective interpretation* – automatically applies given a landscape designation which is easy to understand and acts as sometimes referred to as a ‘closed list’, this includes both national landscape designations such as National Parks and AONB’s but also local planning authority landscape designations applied to landscapes for their quality; or a
- *Cumulative interpretation* – where a designated landscape area is required to also demonstrate landscape attributes to lift it above the ordinary.

4.46 I have undertaken a GLVIA3 Box 5.1 subjective assessment as part of the RLC LVIA and found that the Site is not a valued landscape if relying on its own physical and cultural attributes.

RLC LVIA Table 6 – GLVIA Box 5.1 Landscape Value Review Summary

Factor	Commentary regarding the Site
Landscape quality (condition)	The quality is generally good even with the current sense of disturbance to the part developed southern field.
Scenic quality	Good scenic quality with ability to look east across site to Butchers Wood and north to the small valley.
Rarity	This type of landscape is not rare within the High Weald.
Representativeness	The Site is representative of the High Weald landscape character type but not an exemplary area. It is part of the ridge on which Turners Hill is built.
Conservation interests	Conservation interests exist with the Important hedgerows and larger, mature hedgerow standards.
Recreation value	Limited recreation value kept to the public footpath corridor of 68W and the tolerated paths around the edges of Site.
Perceptual aspects	The Site has neither a sense of remoteness or absolute tranquillity but does have some of both lower down the slope in and towards the northern field.
Associations	There are no known historic events or cultural associations with the Site.

4.47 However given the Site’s positioning and role as the immediate setting of the AONB there is the potential that development upon it could affect the landscape quality and character of the valued AONB landscape on the opposite side of Turners Hill Road.

Cumulative landscape effects with Tulleys Farm

4.48 The Site in landscape terms has a relationship with Tulleys Farm to the west of the southern field. Tulleys Farm is a popular attraction and after reading about its activities and events



online⁴ will appear considerably different during school holidays and at the time of its seasonal events.

- 4.49 The landscape relationship exists because there is only a partial hedgerow between the Site's southern field and Tulleys Farm events car park as pictured below. The two areas are not separated from each other in either landscape or visual terms. The hedge and particularly its veteran tree stock offers some sense of separation when seen from a distance but closer to there is visibility from the Site to the car park and vice versa. This connection appears to have been recently physical as well with rutted tracks running between the two fields.

	
View from Footpath 68W across absent hedge to car park and seasonal pavilions at Tulleys Farm.	Gap in hedgerow between car park and Site. Photograph taken from Footpath 68W

- 4.50 The seasonal car park at Tulleys Farm has denuded the base landscape condition of the pasture field with its rows of rolled stone searchways and resulting strips of grass to park on. It is recognised that it is a low key, unbound form of surfacing and it would be 'relatively' easy to revert back to a productive field but its appears as an unsightly landscape car park when not in use. Given its size and the popularity of events at Tulleys Farm when in use it will appear as a large area of car parking in the countryside near to the AONB. It is not a positive feature within the rural landscape and detracts from the character of the area and erodes the wider landscape quality along this part of the route into Turners Hill village.

- 4.51 The consented development at the Site and any further consented development has the potential to be perceived cumulatively with Tulleys Farm's seasonal events area and car park.

The Site and its landscape relationship to Turners Hill village

- 4.52 The Site is set on the approach to Turner Hill for road users travelling east on Turners Hill Road and walkers on Footpath 68W. It is sufficiently distant from Turners Hill to not currently form a gateway or entry point into the village.

⁴ www.tulleysfarm.com – accessed 5/3/21 and 2/4/21

- 4.53 The approach to Turners Hill on the road initially climbs up Major's Hill with the sense of climbing continuing past the turning to Tulleys Farm on your left, on past their seasonal car park with the hill starting to level off near to the Site. There is still an incline on the ridge past the Site until the first built indication of the village is reached which is the Church of St Leonard set at the junction of Turners Hill Road and Paddockhurst Road. The church is the current gateway point into the village for both these roads with built development including the village school constant to the east running down to the cross roads and village green at the heart of the village.
- 4.54 Effectively there is one field of open countryside between the Site and the church as the entry point to the village. This is the field to the east of Butchers Wood that a permissive path runs through and as pictured on Viewpoint 10 in the RLC LVIA.
- 4.55 For walkers on Footpath 68W they enter into Butchers Wood and then continue along the edges of fields before arriving at the Lions Lane allotments and buildings in the village. The sense of separation between the Site and the village for walkers is greater than road users as there is the wood to pass through and a ninety degree change in path direction.

Field patterns

- 4.56 The historical map pack generated by Groundsure and submitted in support of the application show an unchanged field pattern structure at the Site and in the immediate vicinity with Butchers Wood being evident in its approximate current shape on the 1895-96 edition which is the earliest map in the series. This is not surprising as Butchers Wood is classified as Ancient Woodland.
- 4.57 The field pattern that has changed more noticeably is that of the nearby AONB field that currently contains beet. Its larger triangular shape and scale has come about through amalgamation of fields in between 1938 and 1963 most probably driven by a post war desire for increased food production and use of larger farm machinery.
- 4.58 More recent field use change has come about from Tulleys Farm diversification with the creation of the Maize Maze, seasonal events area and associated car parking in the two fields to the west of the Site. These are new land uses but still within the existing historic field boundaries.

Landscape receptors definition

- 4.59 The landscape receptors that have been identified to have their sensitivity assessed is set below and presented in RLC LVIA Table 7 below. From this list of individual characteristics the overall assessment of landscape sensitivity for the Site and contextual landscape is derived and presented in the embolden sections of the table.
- Defined character areas – High Weald AONB;
 - Site characteristics – Rough grassland, field pattern, existing hedges and trees, proposed natural burial ground planting, Footpath 68W, perceptual qualities;

- Contextual landscape – Nearby parts of High Weald AONB, Turners Hill Road corridor, Turners Hill Cricket Club, Butchers Wood, Tulleys Farm Seasonal Area and remainder of the valley to the north.

RLC LVIA Table 7 –Landscape Receptors’ Sensitivity Table

Landscape Receptor		Sensitivity					Sensitivity Rating
Name	Distance from Site	Receptor Value			Receptor Susceptibility to Change		
		Level	Rational	Rating	Rational	Rating	
High Weald AONB	6m north	National	National designation indicating its value to the nation.	HIGH	Its Special Qualities are highly susceptible to change of this sort.	HIGH	HIGH
Rough grassland	Both fields on Site	Local	As part of field and heath AONB landscape character type and local rural variety.	MEDIUM / LOW	Larger development with change to hard surface for access or shading out by structure planting.	MEDIUM / HIGH	MEDIUM
Field pattern	Site / Wider area	Local / Regional	Small irregular field patterns is a defined characteristic of High Weald landscape.	MEDIUM / HIGH	Possibility to locate development within fields without removing all vestiges of pattern.	LOW	MEDIUM
Existing hedges and trees	Site	Local	Positive contribution to site character and that of wider High Weald.	HIGH	Possibility to build around hedges and trees on Site if sensitively designed but context is changed.	MEDIUM	MEDIUM / HIGH
Proposed natural burial ground planting	Site	Local	The proposed open woodland would have a high value in the wider landscape.	HIGH	Difficult to have both a larger built development and retain the open woodland on Site.	MEDIUM	MEDIUM / HIGH
Footpath 68W – landscape character	Site	Local	Pubic footpaths have a high value for historical value but also allowing people to experience rural landscape.	HIGH	Potential to be able to accommodate both on the same Site but they remain vulnerable to character change.	MEDIUM	MEDIUM / HIGH
Perceptual qualities	South and north	Local	Attractive rural area with some sense of tranquillity but	MEDIUM	Susceptibility is greater in north field where sense of existing	MEDIUM / HIGH	MEDIUM



Landscape Receptor		Sensitivity					Sensitivity Rating
	fields		also detracting features.		disruption is less.		
Overall Site landscape character	Site	Local	Value overall is considered High as the Site has many positive features and contributes to wider High Weald landscape.	HIGH	There is some ability to accommodate development given the maintenance barn but larger, more formal and intensive development cannot be readily assimilated within landscape.	MEDIUM / HIGH	HIGH
High Weald AONB itself – limited to opposite field	15m to south	National	National designation indicating its value to the nation. The attractiveness of the cricket pitch is dependent on its setting.	HIGH	Its Special Qualities are highly susceptible to change of this sort.	HIGH	HIGH
Turners Hill Road corridor	South of Site	Local	Characteristic part sunken route of High Weald landscape, tree lined rural road. Edge of AONB.	MEDIUM / HIGH	Lack of large scale, formal developments along route so susceptible to such change.	MEDIUM / HIGH	MEDIUM / HIGH
Turners Hill Cricket Club Ground	30m to south west	National and Local	Part of AONB and an attractive place to pass leisure time.	HIGH	Susceptibility is High as setting is a key part to character of a cricket pitch in or out of AONB.	HIGH	HIGH
Butchers Wood	East of Site	Regional and Local	An attractive and popular piece of deciduous woodland with good access and usage.	HIGH	Susceptibility is High as neighbouring development of this scale and type can change character of adjacent land.	HIGH	HIGH



Landscape Receptor		Sensitivity					Sensitivity Rating
Tulleys Farm seasonal area and car park	West and north west	Local	A local leisure destination in pleasant surroundings.	MEDIUM	Large, formal development may urbanise what is essentially a rural business site.	MEDIUM	MEDIUM
Northern Valley	200m to south	National and Local	Attractive small valley that acts as the AONB setting and continues High Weald character.	HIGH	Susceptibility is Medium as some detractors such as power lines and Tulleys Farm seasonal activity area.	MEDIUM	MEDIUM / HIGH
Overall Contextual Landscape Area	All around site	National	High value given the AONB status, Butchers Wood Ancient Woodland and attractive nature of valley.	HIGH	Some ability to receive small scale development but much higher susceptibility to larger, intensive development.	MEDIUM / HIGH	HIGH



Overall assessment of landscape sensitivity

- 4.60 As explained in the RLC LVIA landscape sensitivity is defined by considering two factors;
- Landscape value; and
 - Landscape susceptibility to change of this sort.
- 4.61 The Site's landscape value is considered to be **High** as it is a rural area providing the immediate setting to the High Weald AONB and Butchers Wood Ancient Woodland. Landscape susceptibility to change from this particular type of development is considered to be **Medium/High** given the fact that the landscape has already changed from agricultural land and has the presence of the maintenance barn's built form on part of the Site. This within the RLC LVIA Appendix A Methodology look-up table computes through to a give a **High** landscape sensitivity judgement.
- 4.62 For the surrounding landscape context the landscape value is also consider to be **High** as it is made up of the nationally designated High Weald AONB, Butchers Wood Ancient Woodland and an attractive small valley to the north of the Site. More detracting features such as Tulleys Farm's car park do not reduce its value. The susceptibility to change is considered to be **Medium/High** to reflect the existing built form scattered in the contextual landscape but not large formal complexes. Combined this leads to a judgement of **High** landscape sensitivity.

Section 4 - Landscape Baseline Summary Box

- 4.63 As this section is lengthy a summary box of the key points is provided.

- a. The Site and its surrounding contextual landscape fit the descriptions given the area by published landscape character assessments specifically MSDC – High Weald.
- b. The Site's overall landscape character is as an integral part of the High Weald landscape. Currently it remains predominately rural in character even with the part built development set to its western end. The Site's two fields contribute positively to the surrounding landscape and appear in keeping with the immediate and wider contextual landscape even in their current landscape condition.
- c. The landscape condition of the Site's southern field appears disturbed but fundamental landscape characteristics of that part of the Site remain good. The north field's landscape condition is also good.
- d. Landscape management on Site at the moment is low intensity to none with recent mitigation tree and scrub planting not seeming to thrive.
- e. The Site and the nearby High Weald AONB share a similar landscape character and one flows into the other even with the separation of Turners Hill Road and its tree line.
- f. The Site acts as the immediate setting to the AONB.
- g. The wider setting to the AONB in this vicinity includes the valley that runs to the north of

the Site and the Tulleys Farm buildings.

- h. A walker entering or leaving the AONB would not be able to tell any fundamental difference between the landscape character of the Site and the AONB.
- i. The existing consented development at the Site and any further consented development has the potential to be perceived cumulatively with Tulleys Farm seasonal events area and car park
- j. The Site is not a valued landscape as referred to by §170 a) of the NPPF but development on it has the potential to impact the valued landscape of the neighbouring AONB.
- k. The Site forms part of a westerly approach to the village of Turners Hill.
- l. Field patterns at the Site are comparatively small and irregular shaped in the immediate area but large in comparison to some parts of the High Weald.
- m. The field pattern has not changed since recorded on historic maps from 1895-1896.
- n. The overall landscape sensitivity of the Site and surrounding area is considered to be **High**. This is in agreement with the Appellant's landscape advisors own LVIA.

5.0 Visual baseline

Introduction

- 5.1 Visual receptors are “the different groups of people who may experience views of the development” (GLVIA, 3rd edition, para 6.3). In order to identify those groups who may be materially affected a visual baseline desk study and a field study have been undertaken.
- 5.2 On occasions a Zone of Theoretical Visibility (ZTV) study using GIS ground terrain modelling will be conducted to inform the LVIA process where development in the wider landscape may be visible from. This has not been undertaken in this study as given the local terrain and extent of woodland in the area it is better conducted on Site.
- 5.3 During the site visit in March 2021 I was able to review the Zone of Visual Influence proposed by Indigo Landscape Architects and found it to be fair and accurate for the extent of winter views. I have no reason to doubt its accuracy for the extent of summer view either.
- 5.4 In the visual baseline desk study the areas from which the development may be visible is determined along with the different groups of people who may experience changes in their views brought about by the development. Typically these include:
- Residents within settlements or at more isolated locations such as farms;
 - People using key routes such as roads, cycle ways or promoted long distance paths;
 - People within accessible or recreational land;
 - People using Public Rights of Way; and
 - Workers near to the Site – e.g. agricultural and other workers.
- 5.5 Representative viewpoints have been previously selected by first Lizard Landscape Design and Ecology who provided a visual impact assessment for the natural burial ground application and then repeated by Indigo Landscape Architects as part of the current application. It is unclear whether these viewpoints were agreed with MSDC as recommended in the GLVIA3 as good practice.
- 5.6 This LVIA also uses these 18 representative viewpoints and all have been visited and photographed in winter conditions. These winter photographs combined with the summer photographs of Indigo’s LVIA provide a good sense of seasonal change. The RLC LVIA has kept the same viewpoint reference numbers to allow for easier comparison between photographs.
- 5.7 This visual appraisal also considers additional viewpoints where it is considered that they are more helpful to explain a visual effect or explain relationships between landscape areas. These additional views carry the number of the nearest original viewpoint but with a letter suffix to show they are extra views e.g. 3a, 3b, 12a.

List of viewpoints

- 5.8 The following publicly accessible viewpoints are presented as Figure 7 in the RLC LVIA Illustrations;
- Viewpoint 1 – View west from Footpath 68W near Lion Lane Allotments

- Viewpoint 2 – View west from Footpath 68W just before entering Butcher’s Wood
- Viewpoint 2a – Illustrative view of field edge path common to the area
- **Viewpoint 3** – View west on Site from Footpath 68W after exiting Butcher’s Wood
- Viewpoint 3a – View south and west across southern Site from Footpath 68W
- Viewpoint 3b – View from Footpath 68W looking north to small valley
- **Viewpoint 4** – View south west from Footpath 68W
- Viewpoint 4a – Illustrative view from Footpath 68W towards Tulleys Farm
- **Viewpoint 5** – View north east from Footpath 68W after access to the west end of Site
- **Viewpoint 6** – View from Turners Hill Road through entrance to Site
- Viewpoint 6a – View from Turners Hill Road looking east near site entrance
- Viewpoint 7 – View looking west along Turners Hill Road towards the Site entrance
- Viewpoint 8 – View near St Leonard’s Church looking west towards Site
- Viewpoint 9 – View west along Turners Hill Road from near junction with Paddockhurst Rd
- Viewpoint 10 – View west from permissive path from St Leonards Church to Lions Lane
- **Viewpoint 11** – View from Footpath 69W as it leaves the High Weald AONB
- Viewpoint 11a – View north east from gated exit from Tulleys Farm and Site
- **Viewpoint 12** – View from field in AONB immediately to south of Turners Hill Road
- Viewpoint 12a – View north from nearer centre of AONB field to Site
- Viewpoint 13 – View north from top of adjacent field in AONB looking towards Site
- Viewpoint 14 – View east from Footpath 70W across cricket pitch towards Site
- Viewpoint 15 – View east from junction of Footpath 70W and Turners Hill Road
- Viewpoint 16 – View south east from Footpath 71W at Tulleys Farm towards Site
- Viewpoint 17 – View south from Footpath 71W beyond Tulleys Farm
- Viewpoint 18 – View from Footpath 73W near to Miswells Reservoir

5.9 It has been agreed as part of the Statement of Common Ground that only the viewpoints that have embolden numbers actually have an ability to be affected by development at the Site.

5.10 All those that are not emboldened have been scoped out of the ongoing visual impact assessment but the analysis of the panoramic photography has been useful to understand the characteristics of the study area and how the Site relates to it.

Please refer to Appendix A for detailed methodology of defining visual sensitivity

Site Survey Work

- 5.11 Field work was undertaken on the 8th and 9th March, 2021 to record the current baseline conditions. The weather was generally overcast on the 8th March but bright and sunny on the 9th March with good visibility. All presented photography was taken on the 9th March, 2021.
- 5.12 A photographic record of the field survey is located in Figure 7 (Drawing 398-RYD-XX-XX-DR-L-1007) and photography viewpoints illustrated on Figure 6 (Drawing 398-RYD-XX-XX-DR-L-1006). Both these are held in the separate Illustrations Appendix B.
- 5.13 Visual receptors, like landscape receptors need to be assessed firstly in terms of their sensitivity, combining judgements of their susceptibility to the type of change or development proposed and the value related to that receptor to arrive at a judgement of their sensitivity to this particular type of development.

Visual amenity of the Site

- 5.14 The Site even though it is in a state of part development is has good overall visual amenity with sight out from it to attractive landscape features in the local landscape, particularly to the valley to the north. The northern field currently has greater visual appeal as it appears less disturbed and provides for closer sight to Butchers Wood.
- 5.15 There are currently no designed vistas or promoted views on, or around the Site.

Public Rights of Way

- 5.16 A high number of viewpoints are from Public Rights of Way (PRoW) that proliferate in the area as illustrated on Figure 3. The paths appear to be mostly used as local recreational routes within the rural surrounds of Calderdale.
- 5.17 There is one promoted long distance footpath routes in the broader study area and that is the High Weald Way. Views to the Site from it are not possible.

Residents of local properties

- 5.18 There are no residents of local properties as visual receptors on the list. The nearest dwellings are those associated with Tulleys Farm buildings. They have been scoped out of the visual impact list but may still have views from upper storey rooms, particularly in winter months when there is limited leaf cover. Views from local properties have not been assessed as LVIA views because they are not from publically accessible locations
- 5.19 Residents from the nearby area will have a keen interest in their surroundings as they walk the rural footpaths and use Turner Hill Road..

Road users

- 5.20 The term road users includes vehicle drivers, their passengers, cyclists and pedestrians. They have been included within this assessment because they will have a general interest in their

surroundings with transient viewing opportunities as they pass along Turners Hill Road in both directions.

- 5.21 There has been a mix of road views taken from Turners Hill Road but the only one that will provide open sight to the proposed development is the one through the existing access to the Site.

Agricultural workers

- 5.22 Workers in the fields to the north and south of the Site will have their interest directed to their work in hand and less so on their surroundings. Generally their visual sensitivity is reduced given their main purpose for attending the fields is to work.
- 5.23 However this is slightly different in the fields to the north and north west of the proposals as these are on occasion used for leisure / retail purposes with Tulleys Farm using them for pick your own pumpkins and Maize Maze.

Leisure and recreational visitors

- 5.24 Tulleys Farm is not a public location but is publically accessible when events are being held. Some are held at night when visual effects are a lesser concern but there are sufficient held in daylight to mean visitors to the attraction will effectively have a public view onto the Site from the car park and possibly other parts of the seasonal events area such as the pumpkin field.

Promoted viewpoints

- 5.25 There are no promoted scenic viewpoints or large scale panoramic or specifically designed vistas to be taken into account within this visual appraisal. However longer distance views are available from Viewpoint 13 and when looking north from Footpath 68W on Site.

Cumulative visual effects

- 5.26 The one cumulative visual effect that is anticipated to take place is between the proposed development and Tulleys Farm seasonal area. As discussed in landscape cumulative effects these two areas could be 'read' together particularly from Footpath 68W or from the Tulleys Farm events car park looking the other way towards the Site.
- 5.27 The combination of on and offsite built form visible from Footpath 68W until the screen planting fully develops will amplify visual change from this route. In looking back from Tulleys Farm events car park it will most likely be the ability to see further buildings and the overflow/staff car parking area that will lead to cumulative visual effects.

Guidelines for Landscape and Visual Impact Assessment (GLVIA3)

- 5.28 To establish the sensitivity of visual receptors the GLVIA3 recommends that a systematic assessment of the value that the receptors would commonly place on the view is considered in conjunction with the viewer's susceptibility to change brought about by that particular type of development, in this case the proposed crematorium complex.
- 5.29 The sensitivity of visual receptors can then be used in conjunction with the magnitude of visual change to establish the significance of that visual change, remembering that change brought about by development can be either beneficial, adverse or neutral.
- 5.30 The fact that there is already partially built consented development on Site and that its final consented visual appearance will be as open woodland as part of the natural burial has been taken into account when assessing the visual change at these viewpoints.
- 5.31 RLC LVIA Table 8 below establishes the visual sensitivity of the six agreed views where the proposals will be visible.

RLC LVIA Table 8 – Visual Receptors Sensitivity Table

Visual Receptor		Sensitivity					Sensitivity Value
Name	Distance from Site	Receptor Value			Receptor Susceptibility to Change		
		Level	Rational	Rating	Rational	Rating	
Viewpoint 3 – View west on Site from Footpath 68W after exiting Butcher's Wood	On Site	Local	High value as emerging from enclosed and attractive Butchers Wood out to the openness of the Site. This is the arrival view for people using Footpath 68W.	HIGH	There are no buildings or sense of development in this view so there is high susceptibility. Turners Hill Road is not evident and the scene appears entirely rural in character.	HIGH	HIGH
Viewpoint 4 – View south west from Footpath 68W	On Site	Local	High value as rural scene is an attractive one with views north across the small valley and to the south towards the AONB.	HIGH	Susceptibility to change of this sort set at Medium given the existing presence of the part built maintenance barn.	MEDIUM	MEDIUM / HIGH



Visual Receptor		Sensitivity					Sensitivity Value
Name	Distance from Site	Receptor Value			Receptor Susceptibility to Change		
		Level	Rational	Rating	Rational	Rating	
Viewpoint 5 – View north east from Footpath 68W after access to the west end of Site	On Site	Local	High value as rural scene is an attractive one with views north across the small valley and to the east towards the edge of Butchers Wood,	HIGH	Susceptibility to change of this sort set at Medium given the existing presence of the part built maintenance barn.	MEDIUM	MEDIUM / HIGH
Viewpoint 6 – View from Turners Hill Road through entrance to Site	5m south of Site	Local	A Medium value is judged given it is a rural road travelling through an attractive rural area adjacent to the High Weald AONB.	MEDIUM	Susceptibility is judged to be Medium as road users will have passed some development off the road corridor including Tulleys Farm if travelling from west.	MEDIUM	MEDIUM
Viewpoint 11 – View from Footpath 69W as it leaves the High Weald AONB	20m	Local	High value as a receptors are using a rural path crossing through an AONB.	HIGH	Susceptibility is judged as Medium given the presence of Turners Hill Road appearing in the scene and walkers gaining their first sight of the Tulleys Farm seasonal area as well as the large maintenance shed on Site	MEDIUM	MEDIUM / HIGH
Viewpoint 12 – View from field in AONB immediately to south of Turners Hill Road	35m	Local	High value as a recreational rural footpath set within an AONB.	HIGH	Susceptibility is High as there is a general lack of built form in the view and the route is perceived as crossing open countryside.	HIGH	HIGH



Visual baseline summary

5.32 As section 5 contains a large amount of information the following visual baseline summary is provided.

- a. 18 No. representative viewpoints from publicly accessible areas have been identified.
- b. The viewpoints in this LVIA have been given the same references as the Appellants for ease of comparison of summer and winter photography.
- c. Further panoramic viewpoint photography has been provided to illustrate other views on and around Site, or the relationship between different areas. These are the panoramic photographs with letter suffixes.
- d. Of these 18 viewpoints six will experience some degree of visual change should the crematorium complex be constructed.
- e. The visual receptor groups with the highest visual sensitivity are the users of the recreational Footpath 68W as it crosses the Site itself and those on Footpath 69W as it crosses through the nearby AONB. Both these visual receptor groups have been given a High sensitivity.
- f. The visual receptor group with the lowest visual sensitivity are road users on Turners Hill Road as they are travelling along a road rather than walking through the countryside. This group has been given a Medium visual sensitivity.
- g. There are no long distance footpaths, designed vistas or promoted scenic viewpoints that take in the Site.
- h. There are no obvious views from private residencies to the Site.
- i. There are however views from the Tulleys Farm seasonal events area (Please see VPI I a) that as a popular leisure destination should be treated as a public viewpoint.
- j. There is likely cumulative visual effects between the Site and Tulleys Farm as there is existing visibility between the two areas.

6.0 Landscape Impact Assessment

RLC Landscape Impact Assessment (LVIA)

6.1 In making the judgements within the LVIA it has been important to recognise a series of points about the Site that make it different from a typical green field location, these are;

- The Site should not be considered as agricultural land as its lawful use is as a natural burial ground;
- The Site should be judged not in its current disturbed state but with the started developments complete;
- The started developments have been consented and will influence the end character of the Site when they are complete; and
- It has been assumed that the consented chapel building would be replaced by the proposed crematorium building and not built out.

Form of landscape assessment

6.2 The assessment is based upon understanding the effects the development would have on the individual landscape characteristics of the Site before amalgamating all those points to understand what the overall landscape effect would be on the Site as a single entity.

6.3 Secondly landscape effects are considered on the contextual landscape to the Site, the setting to the AONB and the nearby part of the AONB before amalgamating the points to understand the overall landscape effects on the Site's contextual landscape.

6.4 Both sets of amalgamated results are discussed after RLC LVIA Table 9 the Landscape Effects Summary Table.

6.5 Lastly a discussion of cumulative landscape effects taking into account the neighbouring Tulleys Farm is provided.

RLC LVIA Table 9 – Landscape Effects Summary Table

Element or Entity	Sensitivity	Magnitude	Significance & Type of Effect at Year 1	Significance & Type of Effect at Year 7	Significance & Type of Effect at Year 15	Narrative Summary
On-Site Elements						
Road corridor	Medium / High	Medium	Moderate, Adverse	Reduces to Minor, Adverse	Remains at Minor Adverse and Permanent	Judging increased effects from wider access bell-mouth, change in highway verge, increased road network and sense of larger development adjacent to road corridor.
Rough grassland	Medium	Large	Major/Moderate, Adverse	Reduces to Moderate Adverse	Remains at Moderate Adverse and Permanent	Large-scale replacement in southern field with the new crematorium complex and more gradual change as consented in northern field as natural burials proceed.
Field pattern	Medium	Medium / Large	Moderate, Adverse	Remains at Moderate / Major, Adverse	Finishes at Major, Adverse	The southern field's identifiable shape will not remain post development and structure planting and the sense of a rural field would be removed from overall field pattern. Northern field would also change from field to woodland.
Existing hedges and trees	Medium / High	Small / None	Minor, Adverse	Changes to Minor, Positive	Changes to Moderate, Positive	The existing trees and hedges can largely be retained other than widening the entrance gap off Turners Hill Road. Proposed hedge planting would improve condition of existing hedgerows. However their



Element or Entity	Sensitivity	Magnitude	Significance & Type of Effect at Year 1	Significance & Type of Effect at Year 7	Significance & Type of Effect at Year 15	Narrative Summary
						rural context is reduced.
Proposed natural burial ground planting	Medium / High	Medium / Large	Major / Moderate, Adverse in southern field. Minor Adverse in northern field.	Moderate Adverse in the southern field. Minor Adverse in northern field.	Moderate Adverse in the southern field. Negligible, Adverse in northern field.	The consented natural burial landscape aims to create a woodland of standard trees with understorey meadow in a gradual fashion across the Site. If that is used as the baseline the proposed structure and amenity planting in the southern field will lead to the reported adverse landscape change. The northern field is largely unaffected but with increased structure planting at its open edges first.
Footpath 68W – landscape character (not views from path that are considered in Visual Effects)	Medium / High	Small increasing to Large	Moderate / Minor, Adverse	Moderate, Adverse	Major, Adverse	The hedgerow planting to both sides of the route will change the appearance of the path corridor from one that is relatively open and attractive to one that is totally enclosed to both sides.
Perceptual qualities	Medium in southern field Medium / High in northern field	Medium in southern field Small in northern field	Moderate, Adverse in southern field. Moderate / Minor Adverse in northern field.	Moderate, Adverse in southern field. Minor, Adverse in northern field	Minor, Adverse in southern field. No effect compared to future baseline of a natural burial ground	The perceptual changes will be more noticeable in the southern field rather than the northern field where the complex's increased activity and built form is more influential. The structure planting in the southern field starts to reduce some of the adverse perceptual effects on



Element or Entity	Sensitivity	Magnitude	Significance & Type of Effect at Year 1	Significance & Type of Effect at Year 7	Significance & Type of Effect at Year 15	Narrative Summary
						establishment around Year 15.
Overall Site landscape character	High across both parts of Site.	Medium / Large Medium	Major, Adverse in southern field. Major / Moderate in northern field.	Major/Moderate, Adverse in south. Moderate, Adverse in northern field.	Moderate, Adverse in south Minor, Adverse in northern field.	<p>Judged against either the approved natural burial ground baseline or the current rough grassland field baseline the change to the southern field's landscape character will be Major after construction reducing to Moderate Adverse on establishment of the mitigation planting.</p> <p>In the northern field where the landscape change is less dramatic it is considered Minor, Adverse.</p> <p>The southern fields' Moderate, Adverse and Permanent landscape character change will be evident in publicly accessible views and the northern field's minor change not readily appreciable.</p>
Contextual Landscape Areas						
Setting to High Weald AONB	High	Medium / Small	Moderate, Adverse	Reducing magnitude of effect leads to Moderate / Minor	Remains at Moderate / Minor, Adverse even with established	The change to the AONB's setting is greatest at construction but the long term change is judged from the low



Element or Entity	Sensitivity	Magnitude	Significance & Type of Effect at Year 1	Significance & Type of Effect at Year 7	Significance & Type of Effect at Year 15	Narrative Summary
				Adverse.	mitigation.	key natural burial ground changing to the more intensely developed crematorium complex.
High Weald AONB itself – limited to opposite field and cricket pitch	High	Small	Moderate, Adverse	Minor, Adverse	Negligible, Adverse	To confirm there is no direct physical change to the AONB but rather change in landscape character through proximity to the proposed crematorium complex.
Turners Hill Cricket Club Ground	High as in AONB.	Small/None	Moderate / Minor, Adverse	Negligible, Adverse	No Effect	Cricket club is set away from main proposed development activity and is already heavily screened. Awareness is gained at entrance area to cricket pitch.
Butchers Wood	High	Medium	Major / Moderate, Adverse	Reducing to Moderate, Adverse	Further reducing to Minor, Adverse	Butchers Wood would have a new, developed neighbour to its west. The notability of its neighbour will reduce with time but activity and contrast in the southern field will continue to adversely affect the wood's character. The Site's northern field would be more in keeping with Butchers Wood.
Tulleys Farm	Medium	Medium	Moderate, Adverse	Reducing to Minor, Adverse	Changing to a Minor, Positive, effect predom-inately from the hedge to Footpath 68W	Tulleys Farm car park and events area would initially be influenced by the unscreened crematorium proposals. This would reduce with the proposed screen planting and



Element or Entity	Sensitivity	Magnitude	Significance & Type of Effect at Year 1	Significance & Type of Effect at Year 7	Significance & Type of Effect at Year 15	Narrative Summary
						eventually arrive at a similar position as the proposed natural burial ground with planting between the two.
Northern Valley	Medium / High	Medium	Moderate, Adverse	Remaining at Moderate, Adverse	Reducing to a Minor, Adverse	The crematorium complex will initially contrast starkly with the agricultural north side of valley until mitigation planting establishes. The natural burial ground in the northern field would assist but the structure planting may appear artificial and as hiding something.
Whole contextual Landscape	Medium / High	Medium	Moderate, Adverse	Moderate, Adverse	Moderate / Minor, Adverse	An amalgam of the above results with some reduction in harm at semi-maturity. However the proposals however the final design evolves would be fundamentally at odds with the contextual rural character.



Overall Site Landscape Effects Assessments

- 6.6 In looking at the change to the Site there is a notable difference between the effects in the southern and northern fields. However it should be remembered that the entire Site is judged to have a **High** landscape sensitivity rating.
- 6.7 In the southern field where the crematorium complex is proposed the current rural character would be changed immediately to one of new built form and extensive car park with ornamental planting. On completion of the construction and before any planting can establish the magnitude of these landscape changes is judged to be **Medium / Large** in the southern field.
- 6.8 For the northern field the magnitude of change would not be as large and is judged to be **Medium** as the crematorium complex is set to its southern, upper side and influences landscape character through association and its immediate change of context.
- 6.9 In using the RLC LVIA Appendix A – Methodology Table 7 - Significance of landscape effects rating the southern fields' **High** landscape sensitivity, combined with a **Medium / Large** magnitude of effects returns a **Major** landscape effect rating. This is considered an **Adverse** type of effect with the new development reducing the character of the existing rural field, or the future open woodland of the consented natural burial site.
- 6.10 For the northern field the same look-up exercise returns a **Major / Moderate** landscape effect rating, again considered as an **Adverse** change.
- 6.11 If the two landscape effects for the fields are combined they can be effectively be rated as a **Major / Moderate, Adverse** landscape effect at Year 1 and before any mitigation planting matures, or the landscape form of the wider development establishes. In the RLC LVIA methodology Major and Moderate Adverse landscape effect are defined as below. The Year 1 effect falls between these two definitions;
- **Major, Adverse** - The proposals will result in a large negative change in the key characteristics of the landscape receptor arising from either their loss, reduction or introduction of uncharacteristic elements to it so as to destroy it or seriously degrade the integrity of the landscape receptor. The proposals may also be in conflict with adopted planning objectives for the landscape.
 - **Moderate, Adverse** – The proposals will result in a partial change in the key characteristics of the landscape receptor arising from either their partial loss, reduction or introduction of some uncharacteristic elements to it so as to moderately reduce or degrade the integrity of the landscape receptor. The proposals may also be partly in conflict with adopted planning objectives for the landscape.
- 6.12 Taking the key words from the Major, Adverse definition the following observations are made for the southern and northern fields;
- 6.13 Southern field – Immediate **loss** of rough pasture, field pattern and overall rural character, **reduction** in character of natural woodland burial proposals and Footpath 68W and

- introduction** of the uncharacteristic formality of the crematorium complex. The proposals are in **conflict** with planning policies to protect the intrinsic character of the countryside.
- 6.14 Northern field – Already consented **loss** of pasture and field pattern, initial **reduction** in character through association with the nearby crematorium complex which is an **introduction** of an uncharacteristic and intensive form of development near to the natural burial ground. The natural burial ground proposals are **not in conflict** with planning policies to protect the intrinsic character of the countryside and they are a consented, lawful use of the field.
- 6.15 The effects of the mitigation planting are acknowledged in the landscape effects assessment following the same 7 year and 15 years post completion points of assessment as used by Indigo Landscape Architects in the Appellant’s LVIA.
- 6.16 After 7 years the amenity planting such as curved hedges and tree lines in the car park and remembrance garden would have established but not reached an appearance of maturity unless advanced stock is used. The proposed native boundary hedges and structure planting would be more noticeable but again not at a state of maturity.
- 6.17 After 15 years the amenity planting would be at a fully established state, as would the native boundary hedges. The structure planting would be at a semi-mature state and be giving an increased sense of enclosure to the areas of the Site where planted.
- 6.18 With this planting in place it would reduce the sense of change to the Site’s landscape character to **Moderate** but would still remain an **Adverse** landscape effect. The complex in landscape terms remains a largely formal, processional landscape with structure planting combined with amenity planting, parkland planting and a greater intensity of use. The crematorium’s overall form is not characteristic to the Site itself, its immediate rural contextual landscape or this part of the High Weald’s landscape character area.
- 6.19 The intrinsic character of the countryside would not be protected but rather replaced with a more intensively developed crematorium complex that do not complement, or match the local rural scene but rather imposes its own character upon it.

Landscape effects on the contextual area

- 6.20 The contextual area will experience diminishing landscape effects with the introduction of the crematorium complex. It diminishes due to the increased screening effects of the structure planting associated with the proposed development. Initially the landscape effects on the contextual area is considered to be **Moderate, Adverse**.
- 6.21 The immediate setting of the AONB will in the long term experience a **Moderate to Minor, Adverse** effect. This is caused by the crematorium complex’s more evident form of development including its external areas leading to a greater adverse landscape change adjacent to the AONB when compared to the landscape character of either the current rough grass field or the consented natural burial ground.

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- 6.22 The High Weald AONB itself experiences negligible, adverse landscape change as does the Turners Hill Cricket Club which is also located in the AONB.
- 6.23 Butchers Wood Ancient Woodland initially experiences notable adverse effects from the reduction of rural character to its west. This would reduce with the establishment of the mitigation structure planting and the development of the natural burial ground in the northern field. However it would not be totally removed and remain a Minor, Adverse character change due to its changed context. The remainder of the local valley to the north of the crematorium complex would also experience a similar Minor, Adverse landscape character change in the long-term.
- 6.24 The relationship of the proposed development with Tulleys Farm will lead to a long-term Minor, Positive landscape effect derived from increased landscape separation between the two sites. Starting initially with a Moderate, Adverse effect due to the cumulative sense of two denuded countryside areas the separation caused by the double hedgerow along 68W and structure planting on the Site will change this to a Minor, Positive effect.
- 6.25 Taken overall the crematorium's built form and associated external realm is uncharacteristic in the local High Weald contextual landscape. The initial **Moderate, Adverse** effects decline with the mitigation planting to become **Moderate / Minor** but still **Adverse** landscape effects.
- 6.26 The proposals will result in a partial change in the key rural characteristics of the surrounding landscape receptors arising primarily from the introduction of the uncharacteristic elements of the crematorium complex including its extensive formal front of complex areas. This associated reduction in the quality of the surrounding contextual landscape is in conflict with local and national planning policies to protect the intrinsic rural qualities of the countryside.

Cumulative landscape effects

- 6.27 Cumulative landscape effects are those that come about in combination with other developments, existing or planned. The cumulative landscape effect identified with regard to the crematorium proposals is the increased sense of landscape character change brought about with the neighbouring elements of Tulleys Farm.
- 6.28 Both sites do not appear as high quality fields in the countryside under agricultural production but rather as disturbed areas of activity with their intrinsic rural character considerably reduced.
- 6.29 As there is currently ineffective landscape separation between the two areas they can be perceived as interlinked or part of a wider whole. The proposed hedgerows to Footpath 68W and the structure planting to the west of the existing maintenance barn should it establish successfully will help to re-introduce separation between the two sites. However this structure planting is not anticipated to be effective for at least ten years.
- 6.30 Without it the proposals would be perceived as an extending sprawl of development in the rural landscape taking over more fields next to the AONB and reducing the quality of this national landscape's setting.

- 6.31 This cumulative landscape effect also influences the quality of the approach to the village of Turners Hill. At the moment the approach has sufficient undeveloped land along the Turners Hill Road corridor so that Tulleys Farm appears as a rural enterprise set some distance from the village. If development of the crematorium complex occurs this would reduce the effective undeveloped break between Tulleys Farm and the village to the single field opposite to the Church of St Leonard.
- 6.32 The effect on the village approach is considered to be Minor, Adverse in the long-term and relates to the change to the Turners Hill Road corridor next to the Site and an ability to see through the Site access to mark the position and scale of the crematorium complex on the approach to the village.

Landscape benefits

- 6.33 There are few obvious landscape benefits to identify with these proposals particularly in comparison to the consented natural burial ground proposals. However the following benefits to the landscape are identified and can be set against the adverse effects;
- i. Creation of a new permissive path to continue the existing permissive route from St Leonards Church along the Site's southern boundary to intersect with Footpath 68W. This is suggested as a benefit for people walking from the village. They can however already walk on Footpath 68W from Turners Hill to reach this point anyway.
 - ii. As explained in the discussion of cumulative effects the increased landscape separation of the Site and Tulleys Farm is a positive effect of the proposals however this would be achieved by the natural burial ground planting proposals as well.
 - iii. Extension to Butchers Wood Ancient Woodland from developing woodland in the Site's northern field, care has to be taken to ensure the structure planting and commemorative planting is not inferior in mix to the adjacent Ancient Woodland and the natural burial woodland does not appear artificial in form or cluttered with memorials.
 - iv. Hedgerow reformation between the Site's fields or entirely new as per the proposed western hedgerow to the remaining part of natural burial to the Site's northern field.
- 6.34 These benefits appear minor in nature compared to the overall loss of intrinsic rural character at the Site and many are also associated with the consented natural burial scheme. These landscape benefits do not offset the larger adverse effects on landscape character that these proposals would bring about.

RLC LVIA Section 6 - Landscape Effects Summary Box

- 6.35 As this section is quite long a summary box is provided.

a. The effects of the proposed development on the Site's individual landscape characteristics are considered in RLC LVIA Table 9 before they are amalgamated to

assess the overall effect on the Site's landscape character.

- b. On completion of the crematorium's construction the landscape effect is considered to be **Major to Major / Moderate** and **Adverse**. This reduces with the mitigation planting to an eventual **Moderate, Adverse** and **Permanent** effect on the landscape character at the Site.
- c. The landscape effects on the individual areas around the Site that form the contextual landscape for the proposals are considered before an amalgamation judgement of **Moderate, Adverse** is given reducing to **Moderate/Minor, Adverse** on greater maturity of the mitigation screen planting.
- d. Initial adverse cumulative landscape effects with Tulleys Farm car park and seasonal events area are identified but also recognition that the proposed screen planting will separate these two areas on establishment leading to a **Minor, Positive** landscape effect.
- e. Four areas of landscape benefits are identified in total but these are not considered to offset the greater landscape character harm brought about by these proposals.
- f. Overall the proposals would reduce the landscape quality of the setting to the AONB but not reduce the quality of the AONB itself in any meaningful way.
- g. The intrinsic character of the Site's countryside would not be protected but rather replaced by a more intensively developed group of proposals when compared to the consented natural burial ground. The crematorium complex does not complement the local rural scene but rather imposes its own style upon it.

7.0 Visual impact assessment

7.1 This section addresses visual effects that the proposals will bring about. There has been a number of Landscape and Visual Appraisals (LVA's) and Landscape and Visual Impact Assessments (LVIA's) undertaken in connection with the Site and the various planning applications made for it. These include;

- Lizard Landscape Design and Ecology (LLDE) – in association with the natural burial ground application containing a set winter photographs from December 2015;
- Harper Landscape Architecture (HLA) review of the above in connection with the Chapel and Maintenance Barn – no further photography;
- Indigo Landscape Architecture's (ILA) LVA in support of the crematorium application – most recent summer photography; and
- Ryder Landscape Consultants' (RLC) LVIA as a foundation to this Proof – most recent winter photography.

7.2 The various documents generally concentrate on the same viewpoints as set by LLDE. There are generally 18 common viewpoints between studies. The RLC LVIA has kept the same viewpoint reference numbers to allow for easier comparison between summer and winter photography.

7.3 The RLC LVIA has also taken additional viewpoints where they are more helpful to explain an identified visual effect or explain relationships between areas. These additional views carry the number of the nearest viewpoint but with a letter suffix to show they are extra views e.g. 3a, 3b, 12a.

Agreed views experiencing visual effects

7.4 The Statement of Common Ground has helpfully agreed those viewpoints where significant visual change will be experienced as;

- VP3 – View from Footpath 68W as it enters the east of the Site after exiting Butchers Wood;
- VP4 – View from Footpath 68W as it passes through the Site;
- VP5 – View from Footpath 68W at the west end of the Site; and
- VP6 – View to the Site from Turners Hill Road through the Site entrance.

7.5 There is also agreement that two further viewpoints would experience visual change but not at a significant level. These two views are;

- VPI1 – Point of exit from the AONB looking to Site along Turners Hill Road; and
- VPI2 – View north to the Site crossing the neighbouring AONB field.

7.6 These judgements on where visual effects are experienced from have their roots in the consultation responses of Ms Pullan, East Sussex County Council's (ESCC) Landscape Architect providing a landscape consultation response to MSDC. Having attended Site and conducted my

-
- own winter visual survey there is no reason to divert from this judgement. I do however provide more panoramic photographs of views from Footpaths 68W and 69W that help to explain the visual experience from those paths.
- 7.7 This does not mean that the other unlisted viewpoint photography is without value as they help to illustrate the character of the area and prove lack of visual effects from other potential vantage points.
- 7.8 The visual receptors experiencing the change to views and visual amenity from these six viewpoints have had their visual sensitivity defined earlier in RLC LVIA Section 5 as summarised below;
- VP3 – View from Footpath 68W as it enters the east of the Site after exiting Butchers Wood – HIGH visual sensitivity;
 - VP4 – View from Footpath 68W as it passes through the Site – MEDIUM / HIGH visual sensitivity;
 - VP5 – View from Footpath 68W at the west end of the Site - MEDIUM / HIGH visual sensitivity;;
 - VP6 – View to the Site from Turners Hill Road through the Site entrance - MEDIUM visual sensitivity;.
 - VP11 – Point of exit from the AONB looking to Site along Turners Hill Road – MEDIUM / HIGH visual sensitivity;; and
 - VP12 – View north to the Site crossing the neighbouring AONB field - HIGH visual sensitivity.
- 7.9 The **sensitivity** of visual receptors can then be used in conjunction with the **magnitude** of visual change to establish the significance of that visual change, remembering that change brought about by development can be either beneficial, adverse or neutral.
- 7.10 The fact that there is already partially built consented development on Site and that its final consented visual appearance will be open woodland as part of the natural burial has been taken into account when assessing the visual change from these six viewpoints.
- 7.11 Full annotated panoramic photography of the assessed views are presented in RLC LVIA Appendix B – Figure 7. Miniature views of the panoramas are presented below to aid navigation between the assessment and the Appendix figures.

VP3 – View from Footpath 68W as it enters the east of the Site after exiting Butchers Wood



- 7.12 This viewpoint is the first appreciation of the Site after the visual enclosure of Butchers Wood. It is currently open and allows sight up the side of Butchers Wood towards the tree line along Turners Hill Road.
- 7.13 With the crematorium complex in place the crematorium building and floral tribute area would be visible in a dominant position at the top of the obvious slope. The new built form would reduce visibility to the Turners Hill Road tree line that is seen fringing the Site's southern boundary. This intrusive visual effect will last until the mitigation planting establishes. When the planting does establish it will effectively 'hedge-in' the south side of the path removing all sight from the path apart from along the path corridor itself. This solves the problem of being able to see the intrusive crematorium complex but at the cost of removing all sight from this part of Footpath 68W which will feel visually heavily constrained with tall hedges set to both sides of the route.
- 7.14 It can be argued that given the lawful consent for a natural burial ground that this area would be wooded anyway as part of Phase 2 of that consent. However views through the open woodland of the burial ground would be considerably more attractive and appropriate to the High Weald character rather than being visually hemmed in by hedges to prevent views.
- 7.15 The landscape proposals seek to establish a parkland down part of the visible slope to offer scenic views from the crematorium building and its associated external areas. The built features will remain visible even with the established screen planting through the necessary access gap set in the twin hedgerows to allow maintenance and user access across Footpath 68W to the northern field natural burial ground. The overall magnitude of visual change is
- 7.16 The assessed visual change has been assessed as **Major, Adverse** on construction given the scale of the building and its prominent position on the upper part of the slope. It will appear as an intrusive and contrasting new element in this view where there is no built form to provide it with context.
- 7.17 The visual change starts to be screened out at Year 7 after planting if the mitigation planting successfully establishes. There would still be views to some parts of the crematorium complex but also partial loss to the wider view from this footpath. This has been assessed as a **Moderate, Adverse** change.
- 7.18 The RLC LVIA considers the long term visual change then increases to a **Major/Moderate, Adverse and Permanent** effect after the mitigation planting establishes at Year 15 due to the

heavy restriction of views from Footpath 68W which is an uncharacteristic and restrictive planting treatment to both sides of the footpath.

VP4 – View from Footpath 68W as it passes through the Site;



- 7.19 The RLC LVIA assesses there to be a **Medium** magnitude of visual change on construction leading to a **Moderate, Adverse** visual effect from this location, looking in this particularly direction. There would be an increased formalisation of the Site's external realm with such features as the garden of remembrance and reinforced grass access track.
- 7.20 The proposed mitigation planting treatment for this area is plant hedges on both sides of Footpath 68W and further reinforce the southern, Site side of the path with screen planting. As this matures at Year 7 the visual change and formalisation of the Site would still be partially evident and the overall reduction in view to the wider attractive landscape is considered to keep the visual effects at **Moderate, Adverse**.
- 7.21 The proposed mitigation planting style is uncharacteristic of the local landscape character and would eventually on establishment have a **Medium/Large** magnitude of change leading to an overall **Major/Moderate, Adverse and Permanent** visual effect for path users. The hedges and screen planting would effectively hem in their view to the hedged path corridor itself and not out across the Site or wider landscape. They may experience slight winter views through the enclosing hedge up to the garden or remembrance feature.

VP5 – View from Footpath 68W at the west end of the Site



- 7.22 On construction the garden of remembrance area and finished staff / overflow car parking features would be evident in the mid-ground and portions of the crematorium building set behind or to the side of the maintenance barn. The visual receptor's **Medium/High** visual sensitivity combined with a **Medium/Large** magnitude of visual change will result in a **Major/Moderate, Adverse** visual effect.

- 7.23 The proposed mitigation is to hedge both sides of Footpath 68W and plant a block of woodland between the footpath and the maintenance buildings allowing only a forward look along the path.
- 7.24 At Year 7 the visual change and formalisation of the Site would still be partially evident above or through the hedge and woodland unless advanced stock is used. The overall reduction in view to the wider attractive landscape is considered to reduce the visual effects to **Moderate, Adverse**.
- 7.25 The mitigation after an estimated 15 years would have screened out all sight to the proposed crematorium complex and more formal landscape parts of the grounds. However the view to the open landscape to the north of the Site and Butchers Wood to the east would have changed to hedge lines and woodland. The visual receptors' **Medium/High** visual sensitivity combined with a **Large**, magnitude of change will result in a **Major, Adverse and Permanent** visual effect.
- 7.26 The type of effect can be classed as either **Adverse** with the loss of an open, albeit not entirely scenic view or **Neutral** with the formation of a new wooded copse. It has been assessed as an Adverse type of effect given the restrictive nature of hedging both sides of an otherwise open footpath and lack of existing woodland to join the new planting to.

VP6 - View to the Site from Turners Hill Road through the Site entrance



- 7.27 The entrance is realistically the only part of Turners Hill Road where clear view into the Site will be evident. There may be awareness or a perception of built form and activity through the boundary hedge in winter months but this will be visually heavily filtered and probably not visible at all in the summer months. It will also be removed after further boundary planting proposed on Site.
- 7.28 The view as road users approach the Site's entrance will have clues that there is the crematorium facility set behind the hedge and boundary planting including road signage, an access gate, a possibly tidier managed hedgerow and even mown grass verges as the turning for Tulleys Farm displays.
- 7.29 These clues will consciously or sub-consciously allow the position of the crematorium to be marked in the road users' memory and this marked position is then reinforced by the ability to look through the access down onto the Site and to the development beyond.
- 7.30 Currently there is a brief, longer open view through the access gap to the Surrey Hills AONB in the very distance and to the falling ground of the site as it runs into the small valley to the north. The primary visual features are the consented maintenance barn/workshop and the orange hoardings set broadly around the consented chapel location.

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- 7.31 The proposals attempt to restrict the direct views through the access by curving the main access road to the east and setting the crematorium building off the straight axis leading down from the entrance. There is also an indicated small block of tree planting set at the west end of the car park. However there will still be sufficient of the access road visible and it leading off to other areas such as the main car park, overflow car park and the processional route to the crematorium building itself to indicate that there is a larger development on the Site if not all visible through the access.
- 7.32 As rightfully stated by the Appellant's advisors views down the access will be glimpsed as vehicle travel at speed. However other road users such as cyclists will experience a longer duration of view and passengers in vehicles will be able to look more intently at the scene rather than concentrating on the road.
- 7.33 For eastbound road users approaching Turners Hill the 'front of house' area of car parking and ornamental planting would be evident. In accordance with the Crematoria Act the actual crematorium building is set at least 50 yards from the highway (scaled at 90m from road to porte cochere) and will be difficult to see any part of the building directly from Turners Hill Road when mitigation planting establishes.
- 7.34 West bound travellers look towards the less noticeable overflow car park and garden of remembrance. Given their direction and speed of travel they would be unable to see the actual crematorium building.
- 7.35 The visual effects can be split into two categories – those along the road corridor and those parts of the proposed development visible on the Site.
- 7.36 The road corridor changes would include signage, tidying up the entrance area, site gates and increasing its visual presence for people approaching the Site. These works are however already anticipated for with the consented natural burial ground proposals. Overall they are not considered to be any significantly greater than the existing consented scheme.
- 7.37 The visible increase in car park capacity and roadways will increase the sense of a larger development with more associated activity beyond the entrance. In addition the proposals will start to screen off the longer elevated views to the north. The road users as visual receptors have a **Medium** visual sensitivity and combined with a **Medium/Large** magnitude of visual change will result in a **Moderate, Adverse** visual effect on completion.
- 7.38 The proposed mitigation includes a secondary hedge planting, curving hedges within the Site's car parks and lines of amenity tree planting. These would restrict longer views into the Site but not remove visibility to it or a perception of the scale and function of the development. The establishing plants would also screen out any remaining, elevated longer views to the north. At year 7 the amenity planting would be approaching full establishment but the structural and amenity tree planting would still appear young. The **Medium** visual sensitivity combined with a **Medium** magnitude of visual change will result in a **Moderate, Adverse** visual effect at this stage.
- 7.39 With mitigation planting fully established there will be less sight to the more formal planting and car parking 'front of house area' however receptors' **Medium** visual sensitivity combined with a continuing **Medium** magnitude of change, including any changes to the actual road corridor and

total screening of the elevated long views to the north, will result in a continued **Moderate, Adverse and Permanent** visual effect.

- 7.40 Compared to the consented woodland burial scheme there would be an increase in visible development through the access as the current consented scheme only has the single car park turning visible and all of the forward look screened by the open woodland of Phase I of the natural burial ground.
- 7.41 Even though this view is narrow in width and short in duration it is important as it marks the position of the crematorium on the Turners Hill Road corridor, allows road users to understand the scale of the development beyond the hedge and acts as part of the approach to the village.

VP 11 - Point of exit from the AONB looking to Site along Turners Hill Road



- 7.42 The scene on leaving the AONB takes in one of the two exits from the Tulleys Farm car park and looks up the still climbing Turners Hill Road towards the new maintenance barn / workshop on Site and the Site's access.
- 7.43 The visual change has been assessed by the RLC LVIA as **Moderate, Adverse** after construction changing to **Minor, Adverse** after 7 years and **Moderate, Neutral and Permanent** on establishment of the structure planting at the west end of the Site. This change has been assessed as a neutral type of effect as it would be judged as part of the immediate road corridor tree line.
- 7.44 Just over Turners Hill Road near the exit area from Tulleys Farm car park the RLC LVIA presents another photograph labelled 11a to demonstrate the openness of views between Tulleys Farm car park and the Site. This openness and visual connectivity is why cumulatively in both landscape and visual terms they are likely to be perceived as one larger area until the boundary hedge as a very minimum is re-established. The proposed western structure planting would strengthen the sense of separation just as would the woodland planting from Phase I of the natural burial ground proposals.

RLC Additional Viewpoint 11a – View showing Tulleys Farm car park and Site together



VP12 - View north to the Site crossing the neighbouring AONB field.



- 7.45 This view is taken from Footpath 69 in the first field of the AONB to the south of Turners Hill Road and the Site itself. The tree line in the mid-ground of the view is largely set on the field edge bank leading down to Turners Hill Road. Even in these winter conditions the tree line effectively screens off the road and the Site to its northern side.
- 7.46 The effectiveness of the tree line as a screen in this representative winter shot is aided by the oblique angle of the photograph meaning the natural line of sight is along the tree line rather than at 90° and through it. When the path user is in the centre of the large triangular AONB field the view through the tree line is more perpendicular as shown on RLC viewpoint 12a reproduced in miniature below.

RLC Additional Viewpoint 12a – View north to the Site from the centre of the neighbouring AONB field



- 7.47 There are noticeable gaps in the tree line through which the Site can be seen. During the visit in March 2021 the maintenance barn's roof was visible as were the orange chapel hoardings albeit filtered by the tree line. There is no anticipated visibility in summer months.
- 7.48 For both of these viewpoints the path users' visual sensitivity is **High** and both the magnitude of changes will be **Small/None** leading to a **Moderate/Minor, Adverse** significance of visual effect after construction. This visual effect changes to a **Minor, Neutral** and **Permanent** change with the proposed boundary trees along the Site's southern boundary thickening the visible Turners Hill Road tree line.
- 7.49 A summary table of these visual effects assessment is provided below at RLC LVIA Table 10.

RLC LVIA Table 10 – Visual Effects Summary Table

Visual Receptor	Visual Sensitivity	Magnitude of change	Scale and Type of Effect at Year 1	Year 7	Year 15	Narrative Summary
VP3 – Footpath 68W at east end of Site just after Butches Wood	High	Medium / Large	Major, Adverse	Reduces to Moderate, Adverse	Returns to Moderate / Major Adverse and Permanent	The initial post construction effects are going to be Major, Adverse with a new, unscreened crematorium building at the top of the apparent slope. The scale of the adverse visual effect will reduce with screen planting only for the screen planting to ultimately restrict sight to the pat corridor leading to further visual harm.
VP4 – Footpath 68W in middle of Site looking west	Medium / High	Medium	Moderate, Adverse	Reduces to Moderate / Minor Adverse	Rises to Moderate / Major Adverse and Permanent	The view in this direction is away from majority of built form hence the lower rating of significance at Medium, Adverse. After an initial reduction in visual change at Year 7 the maturing screen planting and hedges to both sides of 68W will lead to a larger visual harm by removing views to AONB and northern valley.
VP5 – Footpath 68W at west end of Site	Medium / High	Medium / Large	Major / Moderate, Adverse	Reduces to Moderate, Adverse	Finishes at Major Adverse and Permanent	The view from the west end of the field will experience all of the initial visual change from the crematorium proposals. This will reduce with the initial establishment of the screen planting to then rise again when the screen planting removes all outward views from this section of footpath.
VP6 – Turners Hill Road looking	Medium	Medium /	Moderate, Adverse	Remains at	Remains at	The view through the access after construction will show the extent and



Visual Receptor	Visual Sensitivity	Magnitude of change	Scale and Type of Effect at Year 1	Year 7	Year 15	Narrative Summary
through Site Entrance		Large		Moderate, Adverse	Moderate, Adverse	form of development on Site. The mitigation planting will screen some of the development form but fundamentally the scale and formal character of the crematorium as viewed through the gap will remain keeping the same Moderate level of adverse effects.
VPI1 – Footpath 69W leaving AONB to cross Tuners Hill Road	Medium / High	Medium	Moderate, Adverse	Minor, Adverse.	Moderate, Neutral.	Views will initially be affected by the increased quantum of development and sense of change in across the Site's wider southern field. The western structure planting will start to reduce this impact after 7 years and on establishment the structure woodland would have a similar appearance to the roadside tree line.
VPI2 – Footpath 69W crossing AONB field south of Site	High	Small / None	Minor, Adverse	Minor, Adverse	Minor, Neutral	Views through the tree line to Site are partially evident in winter months. The structure planting proposed to the Site's southern edge should eventually prevent these from happening leading to the final Minor, Neutral visual effect with the tree line appearing thicker.



Section 7 - Summary box of visual effects

7.50 As Section 7 is a length section a summary box of key matters has been provided.

- a. Viewpoints VP3 to VP6 have been agreed as the only views out of the 18 considered to experience notable visual change.
- b. There is general agreement between parties as to the sensitivity of visual receptors at these viewpoints as either **High or Medium / High**.
- c. All visual effects arising from and immediately after construction are **Adverse**.
- d. The level of significance of the **Adverse** visual effects after construction are considered to be between **Major** and **Moderate**.
- e. The level of construction effects diminish with the ongoing establishment of structural woodland planting to screen the proposed crematorium complex.
- f. The RLC LVIA considers that the actual effects of the screen planting, particularly the structure woodland and the hedgerows either side of Footpath 68W will also screen out other attractive views and not just sight to the crematorium complex.
- g. With the mitigation planting established the effect on visual receptors using Footpath 68W is considered to be between **Major** and **Major / Moderate, Adverse** and **Permanent**.
- h. The visual effects of the development from Footpath 69W on leaving the AONB and in crossing the nearby large AONB field are at a considerably smaller scale and the type of effect is considered **Neutral**.

8.0 Mitigation proposals

Definition of landscape mitigation measures

- 8.1 Landscape mitigation measures as described in Table 3.1 of the GLVIA3 as 'proposals for measures designed to avoid/prevent, reduce or offset (or compensate for) any significant negative (adverse) effects.'
- 8.2 There are several types of landscape mitigation and they in turn can be broken down into several categories;
- Integrated mitigation proposals associated with the design of the main development – e.g. access, layout, massing, scale and materials;
 - Soft landscape mitigation – living material such as trees and hedgerows, grass and shrub areas and the ongoing management of the same; and
 - Hard landscape mitigation – boundaries, surfaces, signage, footpaths and lighting.
- 8.3 Mitigation works can be on or off site but the preference is always to place mitigation measures as close to the development that is causing the adverse effect i.e. on Site. However the possibility to conduct off Site mitigation should not be dismissed if this is of benefit and closer to landscape and visual receptors.

Integrated mitigation measures

- 8.4 The following measures have been integrated into the layout of the crematorium complex to minimise the effects it has on the landscape character of the Site, its surroundings and on visual receptors able to see the development;
- Positioning of the crematorium building off the main axial view of site entrance;
 - Curving access road to east;
 - Structural planting across the Site;
 - Amenity planting to car parks, around the crematorium buildings and to form the garden of remembrance; and
 - Keeping the maintenance area and maintenance paths away from the public face of the crematorium complex.

Soft landscape mitigation

- 8.5 With regard to the structural planting and landscape elements the following soft landscape measures are presented at §5.6.8 of the application Design and Access Statement;
- New structural planting on the crematorium part of the Site would involve:
 - Mixed native hedgerow planting along the north side of the proposed permissive footpath along Turners Hill Road, and along the entire south side of Footpath 68W where it runs through the Site.

- Mixed native hedgerow planting to reinforce the existing hedge along the north side of Footpath 68W where it passes between the natural burial ground and the crematorium site.
- Single species native ornamental hedgerow planting around the Garden of Remembrance and within and around the crematorium car park.
- Woodland planting along the Turners Hill Road frontage (between the proposed hedgerow and the crematorium and overflow car parks), around the western side of the crematorium site, and surrounding the crematorium service yard.
- Woodland edge / understorey planting along the eastern edge of the crematorium site against Butcher's Wood.
- Tree planting around the crematorium car park.
- Specimen trees in the parkland area to the northeast of the crematorium.
- Amenity grass areas around the crematorium car park and within the garden of remembrance.
- Native wildflower and marginal plants within the permanent wet areas at the bottom of the attenuation area and in the car park 'rain gardens'.

8.6 No indication of planting protection measures are given which is particularly important in the High Weald area as deer browsing of newly planted areas can prove problematical.

8.7 §5.6.9 of the DAS explains new planting on the natural burial area would involve;

- Mixed native hedgerow planting to form a boundary along the west side the burial ground.
- Structural tree and woodland planting around the natural burial site (drawing 917-MP-01).
- Woodland (memorial) planting within the burial ground, undertaken in a phased approach (as explained on indicative drawings 917-MP-02 and 917-MP-03).
- Native woodland bulb planting undertaken below the trees as burials progress across the Site.
- Native wildflower areas within the woodland glades.

8.8 There is no indication of landscape management objectives and procedures given in the planning application documents made available thus far. This is critical to define if the proposed soft landscape mitigation measures are to ever reach their intended design function and then retain it going forward.

Hard landscape mitigation

8.9 As the application is outline in nature there is not definitive information about the final choice of surfacing material but useful information is presented on the submitted plans and in the Design and Access study to understand the following;

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- 8.10 Main access roads, searchways and closest parts of the main car park to the crematorium building in tarmac;
- 8.11 Secondary car parks and furthest part of main car park in geo-grid fixed gravel as a porous surface to aid with sustainable drainage systems (SuDS).
- 8.12 Rain gardens in the main car parks and an attenuation basin nearer the crematorium building to intercept are proposed to collect surface water run-off from the car parks and allow it to dissipate more naturally
- 8.13 The above SuDS drainage features assume that there is an adequate rate of penetration into the ground for surface water to successfully percolate away.

Landscape effects of the proposed mitigation measures

- 8.14 In comparing the proposed structure planting and amenity planting to the existing consented natural burial planting the following differences are noted;
- The structure planting designed to screen the crematorium complex is denser than the more open woodland formed through the planting of commemorative trees, it will not appear as attractive in closer range views of the Site;
 - The structure and amenity planting in the southern field would be delivered as part of the construction process in a single phase rather than allowing the commemorative woodland to develop over a longer period, this would add to the perceived sense of change at the Site;
 - The structure planting will appear as 'mono-aged' within the landscape rather than as a more attractive, naturally occurring woodland or the commemoration woodland with a range of different tree sizes, ages and stages of life;
 - The amenity planting in the car park, around the crematorium and in the garden of remembrance will not appear as naturalistic planting in a wider rural landscape but rather as more formal planting, civic park planting expected at places of commemoration.
- 8.15 Wildflower meadows are a naturalistic feature of more modern landscape treatment of public areas and could deliver ecological benefits as well as an attractive sward for the chosen summer months it is in flower. However the open space required to create such meadows is reduced with the quantum of structure planting indicated. The structure planting will more quickly shade out the wildflower meadow treatments than the open woodland proposed for the natural burial ground.
- 8.16 The method of creating the two wildflower meadows as indicated has not been defined and as a landscape feature they can be hard to create and keep from turning to rank and visually uninteresting grassland.

Landscape Management and Maintenance Plan (LMMP)

- 8.17 To initially successfully establish a whole new landscape as proposed for the crematorium complex is a challenge, keeping it in a high state of order that is commensurate with the

importance of the funeral services and private acts of remembrance is an equal, if not greater challenge. Although appearing less formal the natural burial grounds will also require considerable active management.

- 8.18 There is no landscape maintenance and management information supplied with the current proposals although at §5.6.2 of the DAS a simple statement is made that *'High quality landscaping would be a feature of the scheme.'*
- 8.19 Other than the already part built large maintenance barn / workshop there is little indication of how the external realm would be kept in an attractive condition. These are of course outline proposals and any future landscape and ecological management plans (LEMP) can be made a reserved matter but it is a factor that requires careful planning in terms of staff, skills, equipment and budget to succeed.
- 8.20 The same level of landscape management exhibited with existing earlier planting phases at the Site would not be sufficient and would not deliver the high quality landscaping as proposed.

9.0 Summary and conclusions

Background

- 9.1 This Landscape and Visual Impact Assessment (LVIA) has assessed the potential effects of developing a new crematorium complex at the already consented natural burial ground at Turners Hill in Mid Sussex. It has assessed effects on the landscape as a resource in its own right and on visual receptors as those people likely to experience the landscape in the area.
- 9.2 It has been produced in accordance with the Guidelines for Landscape and Visual Impact Assessments - 3rd Edition (GLVIA3) published jointly by the Landscape Institute and Institute for Environmental Management and Assessment (IEMA).
- 9.3 The Study Area was set at 3km from the Site. Through site and desktop surveys, both landscape and visual receptors were identified and their current (baseline) conditions and sensitivity were determined.
- 9.4 The baseline evidence has been collected from existing published landscape character information sources and a survey of the Site and surrounding area undertaken by an experienced Chartered Landscape Architect in March 2021. The following conclusions are presented with regard to both landscape and visual effects that the proposed development would bring about.

Landscape effects

- 9.5 Fifteen landscape receptors have been identified which has allowed assessment of effects on the following landscape areas;
- High Weald Area of Outstanding Natural Beauty (AONB);
 - The Site itself; and
 - The contextual landscape to the Site.
- 9.6 For the High Weald AONB that is a nationally important designated landscape area (and a valued landscape for the purposes of NPPF §170 a) there would be no physical direct landscape effects to it. The proposals would however lead to a Moderate, Adverse landscape effect on its setting at construction, reducing to a Moderate / Minor, Adverse landscape effect after mitigation planting has established.
- 9.7 The Site itself would experience a Major, Adverse landscape effect in its southern field where the crematorium complex is sited and a Major / Moderate, adverse landscape effect in the northern field where the natural burial ground would be implemented. With the proposed mitigation structure planting these landscape effects would reduce to Moderate, Adverse and Permanent in the southern field and Minor, Adverse and Permanent in the northern field.
- 9.8 Four minor landscape benefits have been identified as being delivered by the proposals the most significant of which is the landscape separation of Tulleys Farm seasonal events and the Site and preventing them being considered as a combined landscape area. However the greater landscape harm caused by the proposals outweighs the identified benefits.

Visual effects

- 9.9 Eighteen agreed viewpoints have been visited and analysed before agreeing with the Appellants that it is just six where views to the Site can be readily taken.
- 9.10 There are significant visual effects from these four viewpoints;
- VP3 – View from Footpath 68W as it enters the east of the Site after exiting Butchers Wood;
 - VP4 – View from Footpath 68W as it passes through the Site;
 - VP5 – View from Footpath 68W at the west end of the; and
 - VP6 – View to the Site from Turners Hill Road through the Site entrance.
- 9.11 There are minor visual effects from the following two viewpoints in the High Weald AONB;
- VPI1 – Point of exit from the AONB looking to Site along Turners Hill Road; and
 - VPI2 – View north to the Site crossing the neighbouring AONB field.
- 9.12 The level of construction effects diminish with the ongoing establishment of structural woodland planting and hedgerow proposed to screen the proposed crematorium complex.
- 9.13 This RLC LVIA considers that the actual visual effects of the screen planting, particularly the structural woodland planting and setting native hedgerows either side of Footpath 68W will also screen out other attractive views and not just sight to the crematorium complex.

Natural burial ground

- 9.14 The planting associated with the consented natural burial ground is preferential to the proposed structural woodland planting required to successfully screen the crematorium complex.
- 9.15 The natural burial ground proposals would still be implemented in the northern field but set within a framework of structural planting.

Mitigation planting

- 9.16 The proposed mitigation planting has been reviewed and the importance of a long term landscape maintenance and management plan is stressed.

Overall summary

- 9.17 In both landscape and visual terms the intrinsic character of the Site's rural appearance would not be protected but rather replaced by a more intensively developed group of proposals that are uncharacteristic to the area. The crematorium complex itself has limited rural character, particularly when compared to the consented natural burial ground. The proposals do not complement the local rural scene but rather imposes its own style upon it leading to clear and substantial landscape and visual harm.