

Luddesdown Parish Council

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Louise Read,
Head of Planning,
Tonbridge & Malling Borough Council,
Development Control,
Gibson Building, Gibson Drive,
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ME19 4LZ

By Email

Your ref: TM/20/01318/FL

21 July 2020

Dear Ms Read

Re: Planning Application: Construction of a circular semi-submerged enclosed columbarium within the grounds of Dode Church

We refer to your letter of 7 July 2020 to Gravesham Borough Council in this matter. Luddesdown Parish Council is an interested party as all access to Dode Church is via the single-track lanes passing through this parish. In addition Dode Church and the site on which it is situated borders onto property that is in this parish.

We are writing to confirm that Luddesdown Parish Council is strongly opposed to this planning application. We consider that the proposal in the application will give rise to further expansion of uses at Dode Church, which will lead to further erosion of the quality of the tranquil environment of the area by virtue of increased visitor usage and associated traffic. This fact is recognised in the Planning Statement (para 4.7.1) and the Heritage Statement (para 4.9) supplied with the application.

The business activities undertaken at the Dode Church site have caused many problems for the residents of this parish (particularly the residents of Great Buckland) over the years. Most of the problems have arisen from traffic and noise caused by the holding of weddings at Dode Church and particularly from wedding receptions, many of which carry on late at night.

Dode Church is approached by up to four miles of single-track lanes with blind bends, no official passing bays and in the case of Lockyers Hill, a lane with a steep gradient of up to 1:4. All these lanes are within the parish of Luddesdown. The first 200 meters of Wrangling Lane, in which Dode Church is situated, have no passing places at all. Also great care is needed when vehicles are passing each other at the passing places along Buckland Road due to there being a steep bank on one side down to the fields. The use of Dode Church as a wedding venue brings a lot of extra traffic to the area with cars, minibuses and supporting commercial vehicles. This is all to the detriment of public safety, access and wear and tear along the single-track lanes, especially as this area is a very important place for recreational activities undertaken by walkers, cyclists and horseriders. For their safety this council would

like to see a reduction in the use of the lanes by motorised transport and is very much not in favour of the introduction of new business activities in the area, which would bring more motorised transport.

A report prepared by Kent Highways in 2006 advised that increased traffic movements and frequency of road use (given the rural setting) would cause a nuisance to road frontages and neighbours to the detriment of road safety. No work has been done on the parish lanes since that date to change this position. It is important that traffic is kept to a minimum on these roads to avoid accidents, limit damage to verges and to reduce disruption to residents and other road users passing through the area. Although the applicant has indicated that the visitors to the columbarium will be restricted to appointment only (para 4.7.1 of the Planning Statement) there is no guarantee that this will continue especially at such time in the future when the property is under different ownership.

The parish council has other objections to the planning application based on the fact that Dode Church is a listed building, is situated within the Green Belt and is within an Area of Outstanding Natural Beauty:

- Listed Building - The council does not think that the building of a columbarium within the grounds of Dode Church is an appropriate addition to the site of such a listed building. The use of a long barrow form as a columbarium is a design inspired by neolithic barrows built over 4,000 years ago. It has no association with a church built for Christian worship and there is probably no churchyard in the country that has such a structure. As can be seen from the extracts from OS maps submitted with the Heritage Statement (pages 28 and 29) the actual original historic curtilage of the church building is very small and the proposed site for the columbarium is actually land that was part of an agricultural field and nothing to do with the church. Although para 2.2.1 of the Planning Statement makes reference to “potential pre-Christian religious activities” on the site, no evidence of this has ever been found and the Archaeological Assessment submitted with the application (paras 4.6 and 4.7) concludes that the potential for archaeological remains on the site dating back to prehistoric or Roman periods is low. Therefore, there is nothing appropriate about building a long barrow columbarium on the site. The proposed development is out of keeping with the existing building and its historical context. The addition of this modern day burial mound in no way compliments or supports the heritage nature of the existing listed building.
- Area of Outstanding Natural Beauty - The addition of the large proposed structure at this site in an AONB would be obtrusive and not in keeping with the surrounding countryside. From the plans supplied with the application it seems that the total dimensions of the constructed long barrow (including the entrance area) in which the columbarium is contained will be about 45 meters by 14 meters. In contrast the building of Dode Church is approximately 15 meters by 7 meters. This will lead to a reshaping of a large part of the site, which will be visible from the road, from neighbouring properties and from the air. In addition to protecting the beauty of the landscape AONB status is also about preserving the quiet enjoyment of the landscape. The proposed development will harm the quiet enjoyment of the landscape by bringing more traffic and potentially noisy visitors. The development would not conserve or enhance the character and local distinctiveness of the area. It will be a dominating feature on the site, which has no historic connection with the listed building of Dode Church. It amounts to the addition of further commercial activity conducted on the site. The Planning Statement refers to Willow Row Barrow and Sulton Long Barrow. Both these columbaria are run by a company called Sacred Stones Ltd (www.sacredstones.co.uk). The business model is that people can reserve niches for urns on payment of a sum of money, which is calculated according to the term of use from 1 year up to 99 years. We presume that the applicant is

intending to offer a similar service. We consider that the addition of additional commercial activity in this valley, which is a quiet residential rural area, is not appropriate.

- Green Belt - As the site is in open countryside in the Green Belt the council feels that the construction of the columbarium is inappropriate development that should not be permitted. The applicant is claiming that the development falls under an exception for the provision of cemeteries and burial grounds. We think that the reference to cemeteries and burial grounds in the NPPF is a reference to places for the burying of coffins and not places created solely to store urns containing ashes. In paragraph 4.2 of the Planning Statement reference is made to the Ministry of Justice Burial Grounds Report. However the information contained in this report regarding areas usable for burials only relates to burial plots and land set aside for burials and not areas set aside for cremation (page 9). The building of the columbarium is not required by the local community and will provide no benefit to it. It will actually have an adverse effect on the area and its residents by harming the natural peacefulness of the area with traffic and noise nuisance.

We would also like to refer back to a previous planning application made by the applicant TM/00/00893/FL requesting permission to use the site for 24 days per year for wedding receptions at Dode Church. This application was refused. Reasons given for the refusal included concerns over a significant increase in traffic movement on the local highway network and noise disturbance to neighbouring residential properties. The Planning Statement at paragraph 4.7.2 refers to the existing car park at the site being able to provide space for 10+ cars and vehicles. This number of vehicles arriving at particular times when the site is opened for visitors is highly likely to cause issues with usual local road users and also has the potential to bring a lot of people onto the site at one time which if they are outside in the grounds has the potential to be noisy in what is otherwise a very quiet and tranquil area. We therefore feel that these issues are a good reason for the refusal for this latest application. From a resident's perspective having all these vehicles arriving close together driven down single-track lanes by visitors who are not used to giving way to other road users or manoeuvring into passing places is both disruptive and dangerous. We are already experiencing increased traffic use of the lanes in the parish and are concerned that this will get worse during and after the construction of the Lower Thames Crossing. It is important that development in this area does not exacerbate this problem further.

No impact assessment has been included with the application relating to the extensive excavation of the land that would be required to build the columbarium and construct the long barrow. There is also no assessment on the effect that construction traffic would have on the area. The amount of materials required to be brought to the site would seem to be enormous when looking at the size of the proposed earth mound to be constructed. The single-track lanes are totally unsuitable for the size and number of lorries required to bring in the materials. Such traffic would inevitably cause major disruption to other road users. There are very few places where a lorry and a car can pass. There are hardly any places where a lorry and a van or two lorries could pass each other. The construction of the columbarium is totally unsuitable to be carried out in this area.

We note that the Archaeological Assessment is composed with reference to Gravesham's core plan policies. This seems to us to be incorrect. Surely the relevant core plan policies are those of Tonbridge & Malling Borough Council.

We would also like it noted that we regard the placement of the recent stone circle referred to in paragraph 2.2.6 of the Planning Statement as a development that itself requires planning permission.

We would also like to make the following observations with regard to matters stated in the various documents submitted with the application:

- The applicant's website at dodevillage.com does not refer to the storage of urns on the site of Dode Church. It only refers to the possibility of holding memorial services and the scattering of ashes. Paragraph 1.1.3 of the Planning Statement states that the site currently provides for some limited interment of remains within the grounds of the church and that it has become necessary to consider alternative suitable options for the interment of remains by way of the construction of a columbarium. We strongly disagree with this statement. No evidence has been provided in the application to prove any such necessity.
- Paragraph 2.2.5 of the Planning Statement refers to the retreat building offering on site accommodation for wedding couples. Such a use is not actually permitted as the section 106 agreement relating to the use of the retreat building only permits its use "as a place of religious withdrawal, of seclusion, silence and stillness, a place for bible study, prayer and meditation and for days of recollection and a place for prayer/rest and spiritual input".
- We disagree with the statement made in paragraph 4.4.2 of the Planning Statement that the factors referred to in paragraph 4.4.1 outweigh the harm caused by the inappropriateness given the nature of the development proposed. There is no proven need for this facility, and even if there were, the proposed location is entirely unsuitable due to its position in the Green Belt and AONB and its remoteness with poor transport links, with access only via up to four miles of single-track lanes. No evidence has been provided to demonstrate that further cross funding is required to maintain the church (as suggested in paragraph 4.4.1(4) of the Planning Statement. We suspect that the use of the venue for weddings alone provides more than sufficient funding for this purpose.
- Paragraph 4.5.2 of the Planning Statement refers to Policy SQ1 of the Managing Development and Environmental DPD. We do not think that this development would protect, conserve and, where possible enhance: (a) the character and local distinctiveness of the area including its historical and architectural interest and prevailing level of tranquility, as provided for in this policy. The proposed development would harm the prevailing level of tranquility, as it will bring more noise and disturbance. It would also be out of keeping with local architecture – there is no history of long barrow columbaria being constructed in this area and there is no evidence of any religious or other spiritual activity taking place on this site prior to the building of the church in the 12th century. Consequently we also disagree with the paragraph 4.5.7 of the Planning Statement where it is claimed that this use of the site would be in keeping with the current and historic use of the site and would have no material effect upon the site's tranquility or rural secluded character.
- We disagree with paragraph 4.7.4 of the Planning Statement which claims that the proposals create no material neighbouring amenity impacts in terms of noise, light disturbance, loss of privacy or light issues. On the contrary, the proposals are highly likely to cause noise problems and loss of privacy to neighbouring properties with the activity of more visitors on the site.
- We disagree with paragraph 4.8 of the Heritage Statement, which claims "the development would assist in better revealing the longstanding spiritual origins of the site and its potential pre-Christian religious nature, which may well have been the impetus for the siting of the church here". This statement is entirely speculative and without value as there is no evidence of any pre-Christian activity at this site.
- We also disagree with paragraph 4.9 of the Heritage Statement for reasons stated above where it claims that the development would not have any material effect on the site's tranquility or rural secluded character. The extra traffic and visitors coming to the area would have an adverse effect on this.

For all the reasons stated above Luddesdown Parish Council objects to the granting of planning permission in this case.

Yours sincerely,

Jo Barker
Clerk
Luddesdown Parish Council