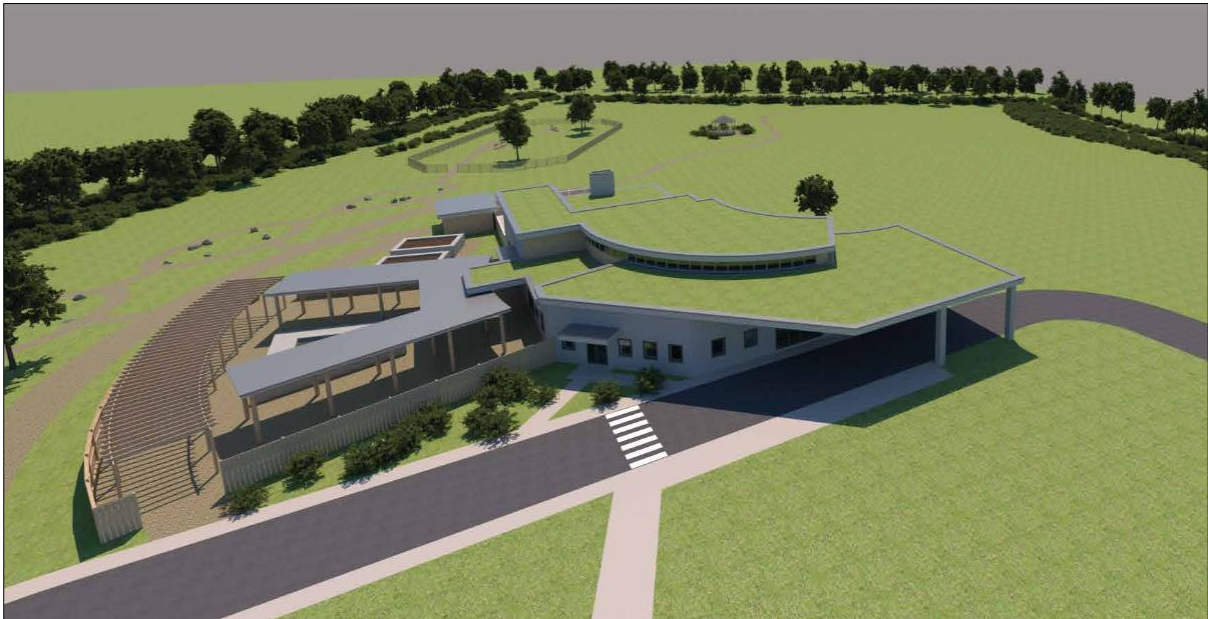

LAND AT GREVATT'S LANE, CLIMPING, WEST SUSSEX, BN17 5RE



Development of land to create a crematorium with associated access, parking and landscaping.

PLANNING, DESIGN AND ACCESS STATEMENT

July 2019

Version: 02

	Name	Date
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1. Background

- 1.1 This Planning, Design and Access Statement has been prepared on behalf of The Southern Co-op in support of a planning application for the *'Development of land to create a crematorium with associated access, parking and landscaping'* on land located at Grevatt's Lane, Climping, West Sussex, BN17 5RE.
- 1.2 This Statement has been prepared in accordance with paragraph 30 of the guidance titled making an application (which forms part of the DCLG's Planning Practice Guidance), Part 3 paragraph 9 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Section 6 of this statement specifically fulfils the duty to:
- Explain the design principles and concepts that have been applied to the proposed development; and
 - Demonstrate the steps taken to appraise the context of the proposed development, and how the design of the development takes that context into account.
- 1.3 This Statement also sets out how the proposed development conforms with the relevant planning policies of The Arun Local Plan 2011 – 2031 (July 2018). In particular, the application is in compliance with policies SD SP3, C SP1, D SP1 and D DM1 of the Local Plan in that the proposal will comprise a high-quality designed development appropriate to its rural setting, which will sit discreetly within a predominantly landscaped site. Furthermore, that there will be no significant impact on wider views towards the site means that the proposals will preserve the integrity of the settlement gap. The proposal will benefit the local community by providing an additional crematorium in a location where there is an identified need for an additional facility.
- 1.4 The application comprises:
- Completed application forms.
 - Completed landownership certificates.
 - Plans and drawings:
 - Location Plan ref
 - Illustrative Views
 - Topographical Survey Drawing
 - Floor Plans and Elevation Plans

- This Planning, Design and Access Statement.

1.5 The application is also supported by the following reports and documents:

- Southern Co-operative Background Document
- Geotechnical Investigation Report
- Phase 1 and 2 Geoenvironmental Assessment
- Flood Risk Assessment
- Tree Report
- Highways Report
- Landscape Visual Impact Assessment
- Landscaping Strategy
- Landscaping Plan
- Preliminary Ecological Appraisal
- Needs Report
- Sequential Test Report
- Agricultural Land Quality Report
- Historic Environment Record Search
- Cremator Technical Details

2. Site context

2.1 The circa. 4 ha application site, shown in figure (1) below, is located on the southern side of the A259 Grevatt's Lane, approximately 2km east of Climping in West Sussex. The site comprises a field that has previously been used for agricultural purposes.

2.2 The site is flat and greenfield. It contains no significant landscaping apart from trees and hedges at the field boundaries. The existing boundary landscaping around the edges of the neighbouring fields and along the highway frontage means that that site is well-screened in longer distance views. Vehicular access is from an informal farm access from the A259 located at the north-western corner of the site, as shown in the first photograph in figure (2) below. The site has scope for a direct vehicular access from the A259 Grevatt's Lane in a position that will ensure good visibility in both directions along the road.

- 2.3 The site lies within open countryside, outside the Local Plan designated Built-Up Area Boundaries and within an area designated as a settlement gap between Littlehampton and Middleton-on-Sea. It is surrounded on all sides by agricultural land on what is otherwise a relatively undeveloped space between Bognor Regis and Worthing. There are, however, exceptions to that, including a commercial estate approximately 300m to the east along Grevatt's Lane (seen in the aerial photograph in figure (1) below) and the Jaybelle Grange holiday lodges development approximately 600m further east. The main residential areas of Elmer, Climping and the western edge of Littlehampton lie approximately 500m south, 500m north east and 2.5 km east of the site respectively.



Figure (1): aerial photograph of the application site (www.google.co.uk)

- 2.4 Although within a designated settlement gap the site is not the subject of any special landscape designations and lies outside the South Downs National Park. The site is not within a Conservation Area and there are no Listed Buildings within the vicinity of the site. Also, the site does not lie within any national or local nature conservation designations. The Ryebank Rife river runs adjacent to the southern site boundary and a small tributary stream runs adjacent to the western boundary. Parts of the application site lie within the Environment Agency Flood Zones 2 and 3 which are at medium to high risk of marine and fluvial flooding.



Figure (2): Photograph of the application site viewed from Grevatts Lane (www.google.co.uk)

- 2.5 Notwithstanding its countryside location the site lies in a relatively sustainable location being within circa. 1 km of the shops, facilities and services at Middleton-On-Sea to the southwest and within 800m of bus stops providing services to Chichester and Littlehampton.

3. Relevant planning history

- 3.1 The Council's on-line planning register does not reveal any relevant planning history pertaining to the application site, although it is known that historically the site has been used for agricultural purposes.
- 3.2 In accordance with advice in paragraphs 39 – 40 of the National Planning Policy Framework the applicant has sought pre-application advice from the Council prior to submitting the current planning application. At the time of writing this report the Council's response is awaited.

4. The proposed development

- 4.1 This planning application seeks full planning permission for the '*Development of land to create a crematorium with associated access, parking and landscaping*' at Grevatt's Lane, Climping, West Sussex, BN17 5RE. The new crematorium is intended to serve the local community in the area around Worthing, Bognor Regis and the surrounding villages. The Applicants have identified a need for a new crematorium premises in this area, which has

been based upon an assessment of local demographics and the high demand placed upon the nearest existing crematoria. This functional need for an additional crematorium in this area is explained in detail in the Needs Report that accompanies the planning application.

- 4.2 Prior to selecting the application site the Applicants undertook an extensive site search for an appropriate site based on the locational requirements of the crematorium (ie its catchment area), the location where a crematorium will be functionally of most need, the planning policy constraints and land availability. The site identification process is explained in detail in the Alternative Sites Assessment Report that accompanies the planning application. The assessment demonstrates that in our opinion the proposed site represents the most viable, accessible and sustainable site for a crematorium in the site search area.
- 4.3 The proposal will provide modern, purpose-built crematorium facility that will address an identified local need as explained above and in the accompanying Needs Report. It will be a secular facility, available to all faiths and members of the community.
- 4.4 The Applicants, The Southern Co-operative, are a local mutual society, owned by members of the community, and who own and operate a network of funeral directors in southern England as well as crematoria and burial sites including the crematoria at The Oaks, Barton Road, Havant, East Devon Crematorium near Exeter, and the Clayton Mount Woodland Burial Ground at Hassocks, Sussex. The Southern Co-operative has a purpose beyond profit, with values and principles supporting sustainable business practice and a commitment to making a difference in their local communities. The Southern Co-operative Background Document which accompanies the application provides more detail regarding the applicant's experience within the funeral and crematorium business.
- 4.5 The design of the proposed development has evolved through an iterative process informed by:
- Site opportunities and constraints;
 - The findings of the technical assessments covering: landscape and visual impact; arboriculture; flood risk and drainage; transportation and highway safety; geoenvironmental assessment; and ecology;
 - An extensive site search for suitable sites for the proposed development;
 - An assessment of the prevailing character of the area;

- A review of relevant National and Development Plan policies; and
- A review of the operational needs of the development.

4.6 The proposal will comprise a detached, single storey crematorium building set back circa. 150 m from Grevatt's Lane and sited centrally within the site, as shown on the proposed Site Plan drawing in figure (3) below. The development will be accessed via a new vehicular access from Grevatt's Lane sited in the northwest corner of the site. To the front of the building there will be two parking areas. The main car park will be hard-surfaced and provide for 100 parking spaces. Around the outside of the car park, a driveway will be provided for the use of hearses etc. In addition to the main car park a second, smaller overflow car park, for 60 cars will be provided in the northeast corner of the site. This will only be required for infrequent use during busy periods or when a service has a particularly large number of guests.



Figure (3): Proposed Site Plan courtesy of The Southern Co-operative Property Department

4.7 Aside from the building and the parking areas the proposals will involve the landscaping of the remainder of the site. The landscaping scheme is detailed in the accompanying Landscaping Strategy and Landscaping Plan which accompanies the planning application and will, for the most part, comprise low level shrubs and ornamental feature trees. The landscaping will be designed to offer mourners a tranquil and attractive landscaped space in which to lay ashes and memorials.

- 4.8 The new crematorium complex, as shown in the CGI in figure (4) below, will comprise a high-quality contemporary single storey flat roofed building with rendered walls under a grass roof. The building has been designed to fit discreetly within a predominantly landscaped site so that it will be visually unobtrusive in the landscape. The design has regard to the location of the site within the settlement gap, by means of the small building footprint, low height and appropriate design and materials. The Landscape and Visual Impact Assessment which accompanies the planning application demonstrates that the proposal will be visually unobtrusive within its landscaped setting and will not be prominent in longer distance views. It demonstrates that the proposal will preserve the landscape character of this part of the designated settlement gap.



Figure (4): CGI of proposed building courtesy of The Southern Co-operative Property Department

- 4.9 The building will incorporate a vestibule and waiting areas, chapel, cremation equipment and ancillary office spaces. The building has been designed so that mourners will enter the chapel from the southern entrance and exit via the western exit lobby into a covered walled floral tribute area incorporating a pergola and water feature.
- 4.10 The application was submitted following a public consultation exercise carried out with the local community. That exercise comprised an open consultation event held at Climping Church Hall on the 25th of January 2019 and to which local residents, councillors and funeral directors were invited. A website was also set up for people to make comment

direct on the proposals if unable to attend the event in person. In total 70 people attended the event.

5. National Planning Policy

National Planning Policy Framework.

- 5.1 Section 2 of the National Planning Policy Framework [“NPPF”] asserts a presumption in favour of sustainable development (paragraph 10) and that the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 7). Paragraph 8 confirms that achieving sustainable development means that the planning system has the following three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways:
- a) **An economic objective** – *to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and co-ordinating the provision of infrastructure;*
 - b) **A social objective** – *to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and*
 - c) **An environmental objective** – *to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.*
- 5.2 Paragraphs 10 and 11 confirm that plans and decisions should apply a presumption in favour of sustainable development and that for decision-taking this means:
- ‘c) *approving development proposals that accord with an up-to-date development plan without delay;*’ or

- d) where there are no development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:*
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'*

5.3 The objectives of the NPPF include: building a strong, competitive economy; promoting healthy and safe communities; promoting sustainable transport; making effective use of land; achieving well-designed places; meeting the challenge of climate change, flooding and coastal change; and conserving and enhancing the natural environment.

5.4 Chapter 6 of the NPPF is concerned with building a strong, competitive economy. Paragraph 80 states that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Paragraph 82 confirms that planning decisions should recognise and address the specific locational requirements of different sectors. Paragraph 83 confirms the Government's commitment to supporting a prosperous rural economy, confirming that planning decisions should enable:

- 'a) the sustainable growth and expansion of all types of businesses in rural areas, both through conversion of existing buildings and well-designed new buildings.....*
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship'.*

5.5 Paragraph 84 of the NPPF confirms that planning decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements. Paragraph 84 advises that in these circumstances, it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable. For example, by improving the scope for access on foot, by cycling, or by public transport.

- 5.6 NPPF paragraph 122 affirms that planning decisions should *'support development that makes efficient use of land, taking into account:*
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;...*
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;*
 - d) the desirability of maintaining an area's prevailing character and setting...; and*
 - e) the importance of securing well-designed, attractive and healthy places.'*
- 5.7 Chapter 12 of the NPPF is concerned with the need for new development to achieve well designed places. Paragraph 124 confirms that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve, and that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 5.8 Paragraph 127 asserts that decisions should ensure that developments:
- *Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - *Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - *Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities);*
 - *Establish or maintain a strong sense of place, using the arrangement of streets, spaces building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
 - *Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
 - *Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience'.*

- *‘Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.’*

- 5.9 Paragraph 130 advises that permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely where the design of a development accords with clear expectations in plan policies, design should not be used by the decision maker as a valid reason to object to development.
- 5.10 Paragraph 131 advises that, in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, as long as they fit in with the overall form and layout of their surroundings.
- 5.11 The message from national policy and guidance is clear; An appreciation of the character of a locality is a fundamental consideration when determining a planning application; and design should pay attention to this character.
- 5.12 Chapter 14 of the NPPF is concerned with meeting the challenge of climate change, flooding and coastal change. Paragraph 155 confirms that inappropriate development should be avoided in areas of highest risk of flooding and steering new development to areas with the lowest risk of flooding. Paragraph 163 confirms that when determining planning applications, LPAs should ensure that flood risk is not increased elsewhere, and that, where appropriate, applications should be accompanied by site-specific flood-risk assessment.
- 5.13 Section 16 of the NPPF relates to conserving and enhancing the natural environment. It affirms that the most sensitive habitats and landscapes should be safeguarded. Paragraph 170 confirms that planning decisions should contribute to and enhance the natural and local environment including by: *‘...b) recognising the intrinsic character and beauty of the countryside,...including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;d) minimising impacts on and providing net gains for biodiversity....e) preventing new and existing development*

from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.’

- 5.14 On the issue of pollution, paragraph 183 confirms that the focus of planning policies and decisions should be on whether the proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). It advises that planning decisions should assume that these regimes will operate effectively. Equally where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.

6. Local Planning Policy

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the adopted Development Plan unless material considerations indicate otherwise. In this instance, the Development Plan comprises:

- The Arun Local Plan 2011- 2031 (July 2018)
- The Climping Neighbourhood Plan (January 2016)

- 6.2 The following document is also a relevant material consideration:

- Parking Standards SPG (October 2000)

The Arun Local Plan 2011 – 2031 (July 2018)

- 6.3 The Arun Local Plan sets out the following strategic objectives for the District and these include:

- To strengthen Arun’s economic base and provide local job opportunities by increasing, diversifying and improving the quality of employment within the District;
- To reduce the need to travel and promote sustainable forms of transport;
- To plan for climate change; work in harmony with the environment to conserve natural resources and increase biodiversity;

- To protect and enhance Arun's outstanding landscape, countryside, coastline, historic, built and archaeological environment and the setting of the South Downs National Park;

6.4 The following policies of the Arun Local Plan are relevant to the determination of this planning application and have been considered in the development of the proposal, as set out in this planning application.

6.5 Policy SD SP1 'Sustainable Development' confirms that the Council will take a positive approach that reflects the presumption in favour of sustainable development in the NPPF and that it will work pro-actively with applicants to jointly find solutions which mean proposals can be approved wherever possible.

Response to policy SD SP1: The proposal will meet an identified need for an additional crematorium facility in this area as detailed in the accompanying Needs Report. The accompanying Alternative Sites Assessment demonstrates that the application site represents the most accessible and sustainable site for the proposed facility within the identified search area.

6.6 Policy SD SP1a 'Strategic Approach' confirms the spatial strategy for the District which aims to maintain the District's unique character whilst ensuring that the needs of the community are met through sustainable growth and the provision of suitable services. This includes promoting and enabling development which supports the main coastal towns of Bognor Regis and Littlehampton role as the main service, employment, retail and social centres.

Response to policy SD SP1a: As detailed above, the proposal will address an identified need for an additional crematorium in the area surrounding Bognor Regis and Littlehampton thereby providing an appropriate community supporting service in accordance with the aims of Policy SD SP1a.

6.7 Policy SD SP2 'Built-Up Area Boundary' confirms that development should be focused within the designated Built-Up Area Boundaries. Policy SD SP1 'Countryside' confirms that land outside the designated Built-Up Boundaries will be recognised for its intrinsic character and beauty and confirms the types of new development that will be permitted in the countryside.

Response to policy SD DP2: Whilst this policy does not specifically include crematoria within the list of such 'countryside suitable' uses, the functional requirements associated with such a use, including the requirement to provide sufficient space for a crematorium building with chapel, waiting areas, equipment and office space, together with sufficient on-site parking provision and ample landscaped area to provide space for laying ashes and memorials and for quiet contemplation, requires a countryside location. In addition, the legislative requirement for the building to be sited at least 200 yards from the nearest residential property, effectively precludes new crematoria from being located in most urban environments. Experience shows that the majority of crematoria are located at the edges of urban areas rather than within them.

6.8 Policy SD SP3 'Gaps Between Settlements' confirms that the generally open and undeveloped nature of the designated gaps between settlements, as identified on the Policies Maps, will be protected to avoid coalescence and retain their separate identity. This includes the settlement gap between Littlehampton and Middleton-on-sea within which the application lies. Policy SD SP3 goes on to confirm that:

'Development will only be permitted within the gaps if:

- a) It would not undermine the physical and/or visual separation of settlements;*
- b) It would not compromise the integrity of the gap, either individually or cumulatively with other existing or proposed development;*
- c) It cannot be located elsewhere;*
- d) It maintains the character of the undeveloped coast; or*
- e) If a subsequent DPD or Neighbourhood Plan deems it appropriate through an allocation.*

Response to policy SD SP3: As stated above, the accompanying Needs Report and Site Alternative Sites Assessment demonstrate why the application site is the most suitable site for the development. Section 6 of this Statement and the accompanying Landscape and Visual Impact Assessment, Landscaping Strategy and Landscape Plan will demonstrate how the proposal has been designed to blend seamlessly into the existing landscape, resulting in no significant impact on wider views towards the site and no resulting adverse impact on the landscape character of the area or integrity of the settlement gap.

- 6.9 Policy LAN DM1 'Protection of Landscape Character' advises that development within the Local Plan area should respect the particular characteristics and natural features of the relevant landscape character areas and seek, wherever possible, to reinforce or repair the character of those areas. The policy confirms that the historic character and development pattern of settlements within the District should be respected, taking into account their distinct identity and setting.

Response to policy LAN DM1: Compliance with this policy will be addressed through the supporting Landscape and Visual Impact Assessment, Landscaping Strategy and Landscape Plan as detailed in paragraph 5.23 above.

- 6.10 Policy SO DM1 'Soils' confirms that, unless designated by the Local Plan or a Neighbourhood Plan, the use of Grades 1, 2 and 3a of the Agricultural Land Classification for any form of development not associated with agriculture, horticulture or forestry will not be permitted unless need for the development outweighs the need to protect such land in the long term.

Response to policy SO DM1: The application is accompanied by an Agricultural Land Quality Report which assesses the land to be grade 3a land. In this case the proven need for the proposed development is considered to be the overriding factor. Evidence suggests that the majority of land in this area is either already identified as, or anticipated to be higher grade agricultural land.

- 6.11 Policy D SP1 'Design' requires all development proposals to seek to make efficient use of land whilst reflecting the characteristics of the site and local area in their layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details. It advises that development proposals should have been derived from a thorough site analysis and contextual appraisal; adherence to objectives informing sustainable design; and the influence these objectives have on the form of development.

Response to policy D SP1: Section 6 of this Statement demonstrates how the proposal comprises a high-quality development which has been sensitively designed to sit within a predominantly landscaped setting, having regard to the location of the site within the designated settlement gap.

- 6.12 Policy D DM1 'Aspects of Form and Design Quality' confirms the aspects of design that the Council will have regard to when considering development proposals, namely: character; appearance/attractiveness; impact; innovation; adaptability; crime prevention; trees and woodland; solar gain; public realm; layout-movement; layout-legibility; public art; density; scale; and aspects of form and design quality.

Response to policy D DM1: The applicant has had regard to all these criteria, where relevant to the proposal, in designing the proposed development.

- 6.13 Policy ECC SP1 'Adapting to Climate Change' confirms that the Council will support development which is located and appropriately designed to adapt to impacts arising from climate change, including the increased probability of tidal and fluvial flooding.

Response to policy ECC SP1: The proposed layout and design of the proposal incorporates elements of sustainable design, including the proposed green roof for the building and locally sourced building materials. The proposal has also been designed having regard to the location of the site within Flood Risk Zones 2 and 3, as demonstrated in the accompanying Flood Risk Assessment.

- 6.14 Policy ECC SP2 'Energy and Climate Change Mitigation' advises that all new development will be expected to be energy efficient and demonstrate how it will achieve energy efficiency measures, use design and layout to promote energy efficiency, and incorporate decentralised, renewable and low carbon energy supply systems. The policy requires all major developments to produce 10% of the total predicted energy requirements from renewable or low carbon energy generation on site, unless this is unviable.

Response to policy ECC SP2: As stated in paragraph 5.28 above, the development incorporates appropriate elements of sustainable design and these will satisfy the requirements of this policy.

- 6.15 Policy T SP1 'Transport and Development' requires new development to provide safe access on to the highway network, provide sufficient on-site parking, contribute to highway improvements, and promote sustainable transport. Policy T DM1 'Sustainable Travel and Public Rights of Way' requires new development to ensure ease of movement, prioritising safe pedestrian and cycle access to the green infrastructure network and

access to public transport and community transport services where a need has been identified.

Response to policy T SP1: The proposal will provide a new access onto Grevatt's Lane which will be located and designed to ensure the required highway visibility to provide safe access and egress from the site. The proposal will incorporate sufficient on-site parking to accommodate the operational needs of the development, together with an additional overflow parking area to accommodate the rare, particularly busy occasions which may require additional parking. It will not prejudice existing pedestrian and cycle access to the green infrastructure network. The site is located within relatively close proximity to the built-up area and within easy access to the nearby coastal towns, including by public transport, with the site being within walking distance of bus stops providing services to within the crematorium catchment area. The application is accompanied by a supporting Highways Report which demonstrates that the proposal will preserve highway safety.

- 6.16 Policy ENV SP1 'Natural Environment' confirms the Council's commitment to encouraging and promoting the preservation, restoration and enhancement of biodiversity through the development process. Where possible new development will be expected to promote the creation of new areas for habitats and species.

Response to policy ENV SP1: The development will result in an enhancement of on-site biodiversity through the retention of the existing mature boundary shrubs/hedging and trees together with the creation of new landscaped areas around the new building.

- 6.17 Policy ENV DM1 'Designated Sites of Biodiversity or Geological Importance' advises that development likely to adversely impact on land with designated features of any Site of Biodiversity or Geological Importance will not normally be permitted.

Response to policy ENV DM1: The site is not located with a designated site of biodiversity or geological significance and the Preliminary Ecological Appraisal which accompanies the application confirms that there are no protected flora or fauna on site that would be harmed by the development proposals.

- 6.18 Policy ENV DM4 'Protection of Trees' confirms the Council's expectation that new development does not have an adverse impact on existing trees of important amenity value, requiring developers to provide land and tree surveys, a tree constraints plan and an arboricultural impact assessment, tree protection plan and method statement for applications involving existing trees on or adjacent to development sites.

Response to policy ENV DM4: The application is supported by the required arboricultural reports to demonstrate that the existing visually significant trees adjacent to the site boundaries will be protected during the development. Also, new tree planting will be carried out as part of the landscaping proposals for the scheme.

- 6.19 Policy ENV DM5 'Development and Biodiversity' requires new development to achieve a net gain in biodiversity and protect existing habitats on site. Development should be designed to incorporate elements of biodiversity and landscape features.

Response to policy ENV DM5: Compliance with this policy is confirmed in paragraph 5.31 above.

- 6.20 Policy W SP1 'Water' encourages new development to incorporate water efficiency measures, make active use of surface water as a design feature, and incorporates measures to improve and enhance waterbodies or provide additional flood relief. Policy W DM2 'Flood Risk' sets out the Council's criteria for allowing development in areas at risk from flooding, including the requirement to meet the sequential test, provide a site-specific Flood Risk Assessment, and identify adaptation and mitigation measures. Policy W DM3 'Sustainable Urban Drainage Systems' requires all new development to incorporate Sustainable Urban Drainage Systems into the design of the development.

Response to policies W SP1, W DM2 and W DM3: The application is accompanied by a Flood Risk Assessment which confirms that the proposed development is appropriate on the site, having regard to the location of parts of the site within the Environment Agency moderate to high flood risk zones. It also demonstrates how the development will incorporate sustainable drainage measures within its design.

- 6.21 Policy QE SP1 'Quality of the Environment' requires all new development to contribute positively to the quality of the environment and not have a significantly negative impact

on residential amenity, the natural environment, or the enjoyment of leisure and recreational activities. Policy QE DM3 'Air pollution' requires all major development proposals to assess the likely impacts on air quality and mitigate any negative impacts. The policy confirms that industrial development that is regulated by environmental permits must be located in such a position which ensures that the health, safety, and amenity of users of the site or surrounding land is not put at risk and the quality of the environment would not be damaged or put at risk.

Response to policy QE SP1: There are no residential properties within the immediate vicinity of the application site, as a legislative requirement is that such developments are sited at least 200 yards from the closest residential properties. With regard to the crematorium emissions, these are covered by Environmental Health legislation and the applicant will be required to hold the relevant Environmental Permit.

Climping Neighbourhood Plan (2016)

- 6.22 Policy CPN7 'Protection of Open Views' requires all new development to protect the open landscape character of the countryside, with the Climping Character Assessment being used as a reference to assess the impact of the proposals.

Response to policy CPN7: This policy accords with Local Plan Policies SD SP3 'Gaps Between Settlements' and LAN DM1 'Protection of Landscape Character' and has been addressed as stated in paragraph 5.22 above.

- 6.23 Policy CPN8 'Protection of Trees and Hedgerows' requires new development to protect trees and hedgerows of arboricultural and amenity value. The policy requires development proposals to include a survey that establishes the health and longevity of any affected trees or hedgerows and a management plan to show how they will be maintained.

Response to policy CPN8: This duplicates the requirements of Local Plan Policy ENV DM4 'Protection of Trees' as discussed in paragraph 5.33 above.

- 6.24 Policy CPN9 'Protection of Natural Habitats' confirms that development resulting harm to national and locally protected habitats will not normally be permitted.

Response to policy CPN9: This accords with the requirements Local Plan policy ENV DM5 'Development and Biodiversity' as discussed in paragraph 5.33 above.

- 6.25 Policy CPN10 'Protection of High Grade Agricultural Land' advises that development will not be permitted on the best and most versatile agricultural land, graded 1, 2 or 3A under the national farmland grading scheme unless there are special circumstances.

Response to policy CPN10: This reflects the requirements of Local Plan Policy SO DM1 'Soils' as discussed in paragraph 5.24 above.

- 6.26 Policy CPN12 'Reducing the Risk of Flooding' requires new development in flood sensitive areas to be designed to reduce the level of flood risk.

Response to policy CPN12: This dovetails with Local Plan Policy W DM2 'Flood Risk' and is addressed through the accompanying Flood Risk Assessment as confirmed in paragraph 5.35 above.

- 6.27 Policy CPN14 'Traffic and the Environment' confirms that development which will have a detrimental impact on highway safety and the living conditions of residents will be resisted.

Response to policy CPN14: This corresponds to Local Plan Policy T SP1 'Transport and Development' as discussed in paragraph 5.30 above and addressed through the supporting Highways Report.

- 6.28 Policy CPN11 'Quality of Design' requires new development to be of a high-quality design and to protect and enhance the local character as assessed by the Climping Character Assessment. The policy lists the criteria which comprise good design, including responding to, and integrating with, the local built environment and landscape context as described in the Climping Character Assessment.

Response to policy D DM1: The applicant has had regard to all these criteria, where relevant to the proposal, in designing the proposed development.

The Climping Character Assessment (January 2015)

- 6.29 The Climping Character Assessment (January 2015) provides evidence to support the Neighbourhood Plan, describing the existing character of the Plan Area by dividing it into

five distinct character areas. The majority of the application site falls within 'The Open Countryside' character, with the northern edge adjacent to the A259 falling within the 'Along the A259' character area.

- 6.30 The Open Countryside is characterised by flat, open, arable farmland and countryside. Paragraph 3.4 of the Character Assessment notes that the whole area south of the A259 represents one of the few remaining undeveloped gaps along the Sussex coast and that the farmland is open with some hedges and woodland at the field edges. It is crossed by a number of deep drainage ditches and the Ryebank Rife. The assessment notes that the fields themselves are intensively farmed but the margins comprising the hedges, woodland and the banks of the drainage ditches are a network of important habitats for wildlife, the natural flora and fauna of the West Sussex rural coastline.
- 6.31 To the west of the Yapton Road and south of the A259 it is noted that there are large arable fields but with few wooded boundaries (paragraph 3.5). The site lies within the designated 'Clymping Lower Coastal Plain' area. Paragraph 3.10 notes that the whole area is low-lying and includes important drainage ditches and the Ryebank Rife. The lack of gradient is noted to be an impediment to surface water runoff and drainage. The design guidance for the Open Countryside area in paragraph 3.12 confirms that most of the area is subject to policies restricting development which is inappropriate to a rural setting, and that much of it forms a strategic gap between Littlehampton and Middleton-on-Sea and a gap between the Clymping Village and the neighbouring Ford and Yapton. It is also noted to be an important area for wildlife, particularly along the field boundaries. New development is also required to include assessment of any impact on existing flood defences and the limited capacity of the area's drainage systems.
- 6.32 The northern edge of the site lies within the 'Along the A259' character area. The road is described as an extremely busy traffic route that runs along the south coast. Paragraph 7.5 confirms that the road has grassed verges and hedges and trees that partially screen the countryside and the residential areas. The design guidance for this character area in paragraph 7.12 confirms that the south side of the A259 is designated strategic gap in the Arun Local Plan. It is noted that it is important that a screened and wooded effect along the road is maintained if any new development is proposed. Any access would need to be designed to ensure safety, provide controlled crossing places for pedestrians and cyclists and maintain traffic flow. Any new traffic movements should not be allowed to

further worsen the already difficult junctions. Any opportunity to reduce the severance effect of this road on Climping should be taken to facilitate free movement around the village, particularly for pedestrians, cyclists or the handicapped.

- 6.33 Section 7 of this Statement, together with the accompanying Landscape Visual Impact Assessment demonstrates how the proposal will comprise a high quality design which will enhance the application site. By providing visually unobtrusive built development within a landscaped setting, served by a single vehicular access from Grevatts Lane and retaining the remainder of the existing boundary trees and hedging, the proposal will preserve the character of this part of the countryside as described in the Climping Character Assessment and detailed above.

7. Design

Use

- 7.1 The nature of the proposed development and its operational requirements mean that the proposed crematorium is a use for which a countryside location is appropriate. Government guidance on the Siting and Planning of Crematoria (1978) sets out the main principles to be considered when siting new crematoria. Essentially, the proposed use needs a site which can provide the following:
- Sufficient space for a crematorium building, to include a chapel, waiting areas, cremation equipment and ancillary office spaces;
 - Appropriate on-site car parking space for visitors, sufficient to ensure that all parking needs can be met on the site (including an overflow parking area for occasional particularly busy services);
 - Ample landscaping space to provide areas to lay ashes and memorials and to allow mourners space for quiet contemplation;
 - Suitable and safe vehicular access;
 - Space to enable the crematorium building to be set back at least 45 m from any public right of way; and
 - Space for the crematorium building to be located at least 200 yards from the nearest residential properties, which is a legislative requirement for all new such facilities (unless written consent of the residents within this area is given).

- 7.2 Whilst in theory there is no reason why the above constraints could not be met within a built up area setting, the reality is that there are such suitable sites are extremely difficult to come by, firstly because of the space required and secondly because competing land uses that generate more value, such as residential, are generally more favoured in such locations. In practice therefore the reality is that most new crematoria are located on sites outside of urban areas, albeit that operators will look for sites as close as possible to the edges of major settlements. This is evidenced by other, recently developed crematoria in the region, including but not limited to;
- The Oaks Crematorium, Havant – Located within a defined settlement gap at the edge of Havant
 - Harbour View Crematorium, nr Poole – Located within a Green Belt location at the edge of Poole
 - East Devon Crematorium, nr Whimple, Devon – Located in a countryside location to the east of Exeter
- 7.3 The Alternative Sites Assessment that accompanies the application explains fully why the Applicants selected the application site for the proposed development in this instance. That process was based on a detailed understanding of the locational requirements of the crematorium, the area with most functional need for a new facility, planning policy constraints, and land availability.
- 7.4 A need for a new crematorium within the area around Bognor Regis and Worthing has been identified and is evidenced in the supporting Needs Report which accompanies the planning application. Having regard to that locational need, the application site is an appropriate location for the proposal, meeting the site criteria identified in paragraph 7.1 above, and being located in a relatively sustainable location in close proximity to the built-up area and within easy access to nearby coastal towns in a location which will be readily accessible to users of the facility, including by public transport as well as by car, as detailed in the 'access' section of this Statement. Whilst there are landscape constraints in this location, in particular the settlement gap designation, it is considered that those constraints can be satisfactorily dealt with through design. Fundamentally a crematorium use is one that is for the most part open and can therefore be integrated successfully into a countryside setting. The gardens and landscaped spaces preserve openness, and buildings and the visual impact of gardens and buildings can be ameliorated through

design (discussed in further detail below). Therefore, the principle of a crematorium development within the settlement gap is considered to be appropriate having regard to the need that exists in this case.

- 7.5 The proposed development would change the use of the land from agricultural to a crematorium use. There is therefore a loss of agricultural land as a result of the proposals. An independent study of the quality of the soil has been commissioned which finds the land in this case to fall within sub grade 3A, and the site therefore falls within the range of higher-grade agricultural land. This is, indeed, the case for much of the land in this area, and can also be expected to be the case for some if not most of the surrounding agricultural land that has not yet been assessed. Policy SO DM1 of the Arun Local Plan seeks to preserve higher grade agricultural land *'unless need for the development outweighs the need to protect such land in the long term'*. In this case the established need for a crematorium is considered to constitute appropriate justification for the development.
- 7.6 Overall it is considered that in view of the identified need for a new crematorium in this location the benefits of the proposed development justify the development of the land as proposed in principle, subject to appropriate design.

Amount

- 7.7 The amount of new built development is dictated by the functional requirements of the proposal. The building is relatively small, with a footprint of circa 1000 sq m and sufficient to accommodate the required vestibule and waiting room, chapel and chapel exit lobby, administration areas, and crematory facility areas. The site coverage of the building constitutes less than 4% of the total site area.
- 7.8 The majority of the new built development is associated with the two new parking areas and internal access service road. The parking areas have been designed to be of the minimum size workable, but large enough to ensure sufficient car parking for two, large funeral services. Whilst there is only one chapel in the building it is necessary to plan for the occasional circumstances when people arriving for one service cross over with another leaving. Clearly, it would not be appropriate to rely upon off-site car parking availability in this case, and therefore all car parking demand needs to be met on site.

- 7.9 The parking areas have been split into a main car park closer to the building and a separate overflow parking area. The form and location of the parking areas allows for a landscaping scheme to be provided that will soften the appearance of those parking areas on looking into the site. Additionally, the overflow parking area will be finished in gravel. The parking areas and access roads account for approximately 10% site coverage in all.
- 7.10 In assessment the 'amount' of development it is clear that buildings and hard surfaces in this case would account for a small proportion of overall site coverage, in this case less than 20% overall. The remainder of the site will be landscaped, and on that basis therefore, it is clear that the majority of the site, in excess of 80% will remain open and free of buildings or hard surfaces. This is clear indicator that the integrity of the settlement gap will be preserved.

- 7.12 The building is designed to provide ease of use to visitors. On approaching from the car park mourners will be led through the main entrance doors, on the inside of which will be a vestibule providing access on to the main chapel, or alternatively to a separate waiting room for visitors awaiting the next service. The main chapel will have seating space for approximately 100 people. At the end of a service mourners will be led out to the memorial space at the side of the building, within which they can congregate and pay tribute to the deceased. From there mourners are able to leave directly to the car park, avoiding the need to disturb any following service.



Figure 5: View of the approach to the crematorium building

- 7.13 Via a separate entrance from the chapel building coffins will be taken by staff to the cremator located at the rear of the building. Additionally, there is a staff office located at the front of the building.
- 7.14 To the sides and rear of the building will be the formal and informal gardens which will provide spaces for quiet contemplation in which ashes may be scattered or memorials placed by visitors. This space can be accessed by walking around the outside of the building, so that visitors do not need to interrupt services taking place.
- 7.15 The layout of the building takes its cue from other crematorium facilities operated by the Applicants and that are known to work effectively. The overall aim is to provide a quiet and dignified ceremony and to give mourners the opportunity to talk amongst

themselves both before and after the service as they wish without the need to disturb any services preceding or following.

- 7.16 To the front of the building will be the car parking areas for the proposed development. As noted above, those will be large enough to meet the demand for parking space that could occur at particularly busy times, although in practice it is unlikely that the overflow car park would be subject to frequent use simply because the chances of two particularly busy services happening next to each other are low. A time buffer is built in between services in order to limit the potential for cross overs of this type.
- 7.17 As noted above, the parking areas have been designed and arranged so as to leave ample space for landscaping. That landscaping will serve to offer the site with a suitable setting having regard to the site's rural location.

Scale

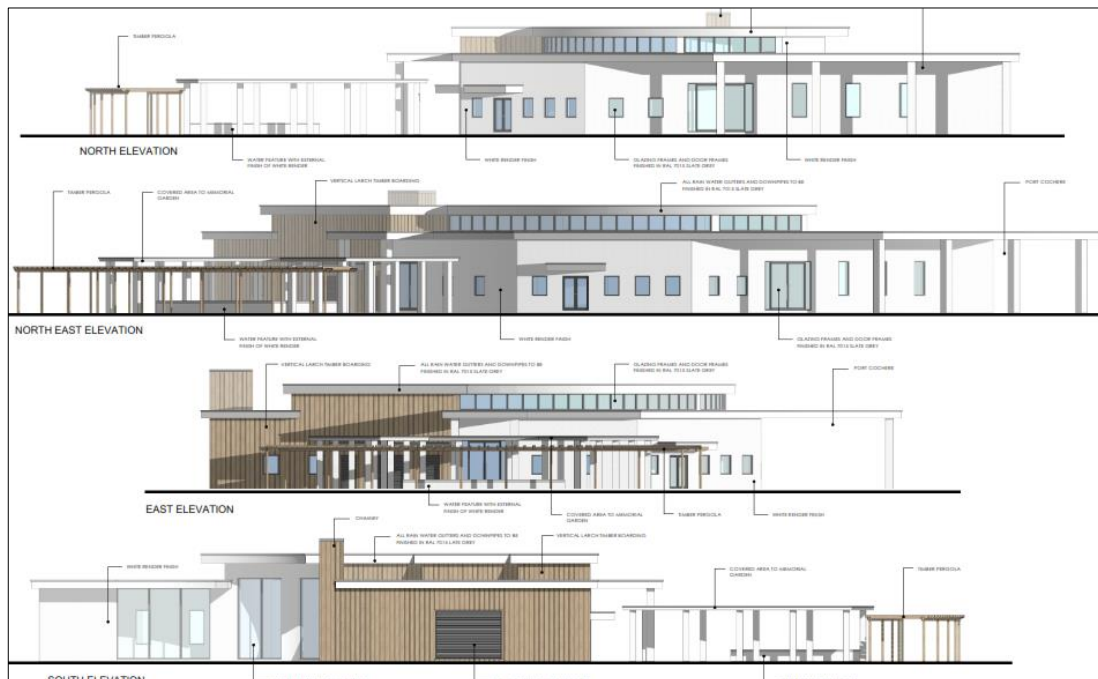
- 7.18 The new building will be of a single storey, flat-roofed low height, which will enable the building to assimilate discreetly into its landscaped setting. Given the landscaping that will both be retained and provided at the site boundaries the low scale of the proposed building is such that it will be well screened in longer distance views across the settlement gap.



The north east elevation of the building

Appearance

- 7.19 The new building will comprise a high-quality contemporary single storey flat roofed building with rendered walls under a grass roof. The building has been designed to fit discreetly within the predominantly landscaped site, so that it will be visually unobtrusive in the landscape, having regard to the location of the site within the settlement gap, by means of its small footprint, low height and appropriate design and materials.
- 7.20 Design features such as the green roof will further enable the building to assimilate into the landscape setting and reduce its visual prominence.



The proposed building elevations

- 7.21 The elevations of the building will be finished in a combination of render and timber cladding, with the timber utilised on the tallest part of the building, that being the chapel area. The overall approach is to provide a simple yet contemporary building that sits well in its landscaped setting. At the site of the building a timber pergola will be provided over the memorial garden.
- 7.22 Great care has been taken in designing the building to minimise the height of the chimney in the interest of the ensuring that the building is not a prominent feature in the landscape. The chimney height is thus limited as 7.6m, that being the minimum possible whilst complying with the necessary technical requirements.

Landscaping

- 7.23 Landscaping comprises a significant part of the proposed development and is integral to the operation of the crematorium, providing a tranquil and attractive place for mourners to congregate, lay ashes and memorials, and reflect upon lost loved ones. It will also ensure that the proposals will blend seamlessly into the rural setting of the site and ensure that the new built development will not be visually intrusive in wider views towards the site.

- 7.24 Cognisant of the location of the site within the designated settlement gap, the application is supported by a Landscape Visual Impact Assessment (LIA), Landscaping Strategy and Landscape Plan. The LIA fully assesses the landscape and visual impact of the proposed development and demonstrates that there would be no harm to the wider landscape visual amenity of the area and that the modest nature of the new built development, which will sit discreetly within the predominantly landscaped site, will not result in a disproportionate accumulation of built form and will have no perceivable impact upon wider views towards the application site. As such the proposal will preserve the integrity of the designated settlement gap.
- 7.25 The proposed landscaping plan provided with the application demonstrates that the scheme will ensure that the new development will assimilate into its rural setting. It mainly comprises low level shrubs and ornamental feature trees. It will also incorporate the retention and reinforcement where appropriate of existing boundary hedging and trees.

Access

- 7.26 This Statement is to be read in conjunction with the accompanying Highways Report. The Highways Report confirms that the proposals will preserve highway safety.
- 7.27 The proposed development will provide appropriate provision for parking and safe access in accordance with the requirements of Local Plan Policies T SP1 and T DM1 and Neighbourhood Plan LPN14. The development will be accessed via the A259 Grevatts Lane via a single vehicular access sited at the northwest corner of the site. This will replace the existing sub-standard former agricultural access. The new access will provide for visibility splays along Grevatts Lane to ensure safe access and egress from the site.
- 7.28 The access will serve two parking areas adjacent to the front of the site. The larger, main car park will be hard-surfaced and provide for 100 parking spaces. Around the outside of the car park, a driveway will be provided for the use of hearses etc. In addition to the main car park, a second, smaller overflow car park, for 60 cars, will be provided in the northeast corner of the site. This will only be required for infrequent use during busy periods or when a service has a particularly large number of guests and will be finished in gravel, so that when it is not in use it will appear as part of the site landscaping.

- 7.29 The Council's adopted parking guidelines do not contain specific standards for crematoriums and the proposed parking provision is based on the applicant's extensive experience within this sector. The smaller overflow car park would only be subject to occasional use, because for day to day use the spaces in the main car park would be ample to meet the needs of the development. In the normal operation of the crematorium there would only be one ceremony taking place at a time, and only in busy periods would people be waiting for the following ceremony. The overflow parking would be needed during those occasions where a service has a particularly large number of guests. Despite that, the applicant's experience confirms that it is appropriate to make parking provision for such rare occurrences on site rather than be dependent on on-street parking.
- 7.30 The new development will not generate a level of additional traffic that would adversely affect road safety or the ability of existing transport infrastructure to accommodate any resulting additional vehicle movements.
- 7.31 The site is located within relatively close proximity to the built-up area and within easy access to the nearby coastal towns, including by public transport, with the site being within walking distance of bus stops providing services to within the crematorium catchment area. The proposed development will not obstruct any existing cycleways or footpaths within the site vicinity and the development will include cycle parking facilities. Therefore, users of the crematorium will have a choice of a range of transport modes, albeit that the nature of the use means that the majority of visitors arrive by car.

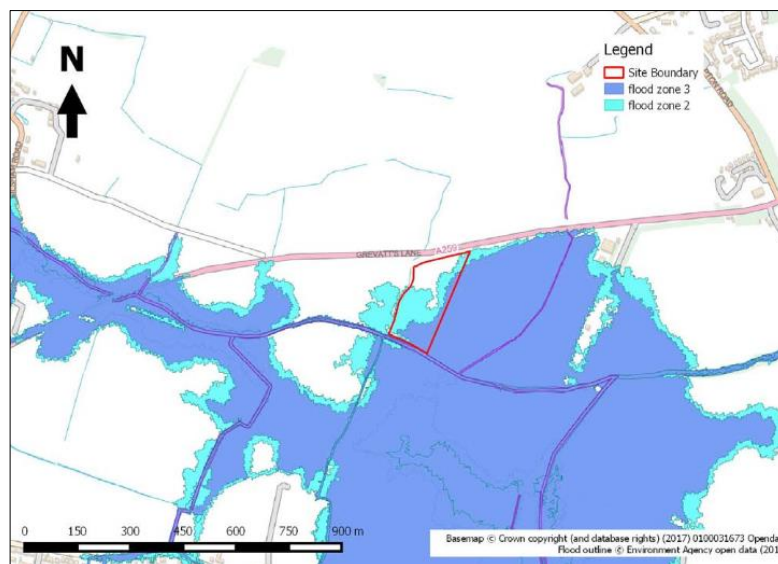
8. Ecology

- 8.1 A Preliminary Ecological Appraisal of the site has been undertaken by SLR Ltd and a copy of their report accompanies the application. The report was prepared using a combination of desk-based research and a site survey. As may be expected, the report concludes that the majority of the site has been in intensive arable use and therefore of negligible ecological value. However, the field boundaries have the potential to support protected species, as may the ditch to the south of the site.
- 8.2 Apart from where alterations are needed to facilitate the new access point the field boundaries will all be retained in situ. Additionally, the proposals provide for substantial new tree planting and landscaping within the site. As such, there is potential for the

proposed development to deliver biodiversity enhancements. To that end, the final landscaping plan shall be subject to the input from the ecologist to ensure that enhancements are delivered where possible.

9. Flood Risk

- 9.1 As noted above, the site falls at the edge of a flood zone area, and different parts of the site fall within flood zones 1, 2 and 3 respectively, as shown on the flood map extract below. A detailed flood risk assessment has been undertaken by SLR and a copy of their report accompanies the application.



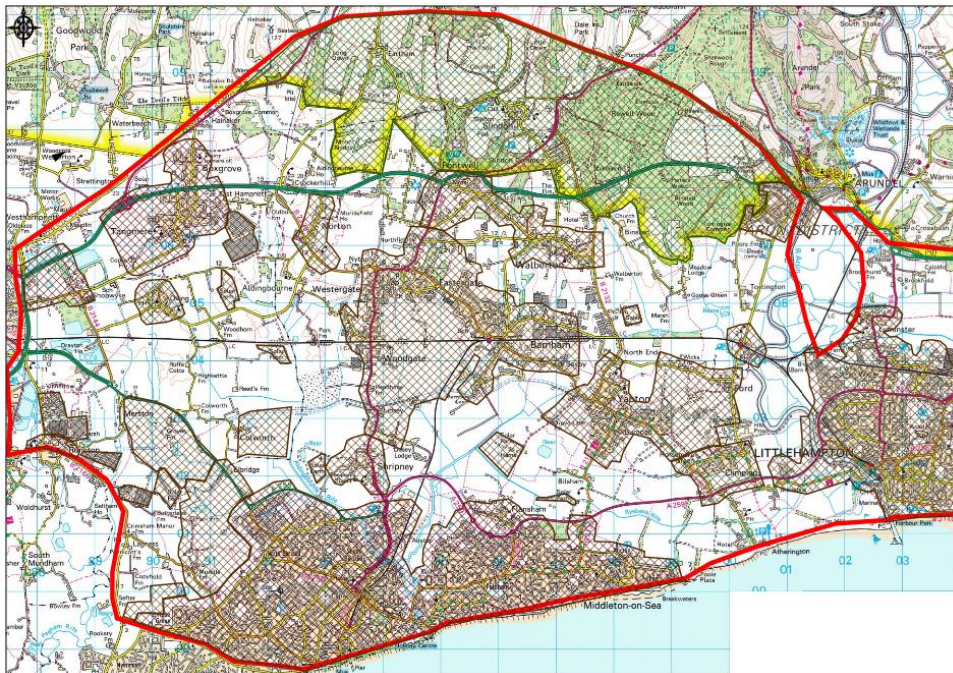
Environment Agency Flood Map

- 9.2 It can be seen from the above plan that the north west corner of the site, including the access point, falls within flood zone 1. The central section of the site falls within flood zone 2 whilst the south eastern corner falls within flood zone 3a.
- 9.3 The proposed crematorium building would be located within the part of the site identified as flood zones 1 and 2, and therefore falls partially within the flood zone. Ideally the building would be relocated to a position within flood zone 1 only in order that it would be entirely outside of the flood zone. However, in this case that is not possible due to the legislative requirement that new crematorium buildings not be located within 45 yards of a public right of way, which includes those on the north and west site boundaries.

- 9.4 The memorial gardens to the rear of the crematorium building will fall within flood zones 2 and 3, but those elements of the proposals are not flood sensitive.

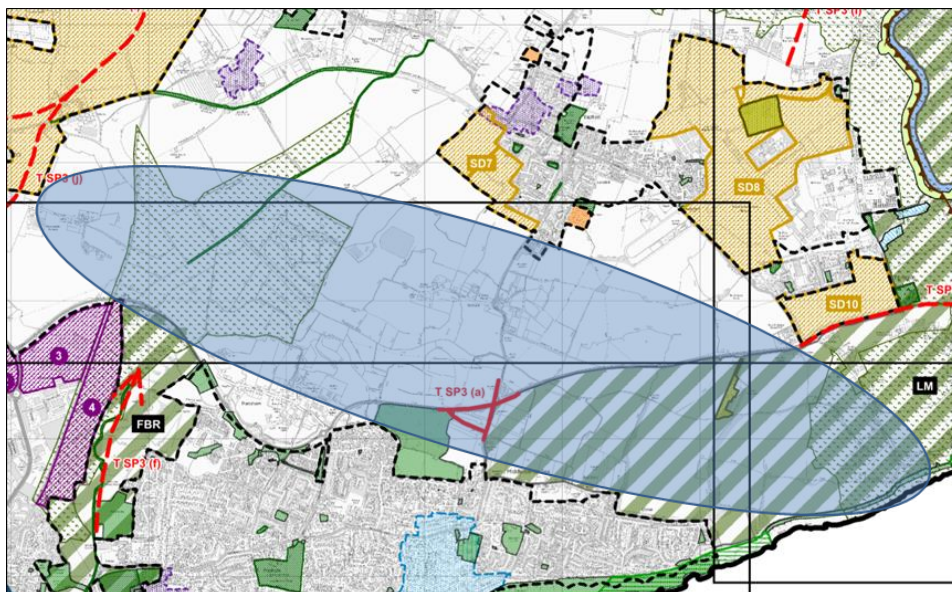
The Sequential Test

- 9.5 To return to the crematorium building, given its location within an area of known present or future flood risk then in accordance with paragraph 158 of the National Planning Policy Framework the 'Sequential Test' needs to be applied to the proposed development. The NPPF states that *'the aim of the sequential test is to steer new development to areas with the lowest risk of flooding. Development should not be allocated or permitted if there are reasonably available appropriate sites for the development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.'*
- 9.6 It therefore needs to be considered whether there are any reasonably available alternative appropriate sites for the development in areas outside of the flood zone. Defining 'reasonably available appropriate sites' is the first step in that process. Fundamentally any potential 'available' site would either need to be already earmarked for such a development in the development plan, or be known to be available to the developer by reason of being on the market. Any available land would then need to be assessed for its appropriateness to accommodate the proposed development. When considering appropriateness in the light of a crematorium development that would be led by a combination of factors including its locational requirements, planning policy constraints and also the legislative requirements set out in paragraph 7.1.
- 9.7 The Arun Local Development Plan does not allocate any sites within the District for a new crematorium development. Alternative sites for the proposed development can therefore only be identified from a search of available land within the search zone.
- 9.8 The Alternative Sites Assessment report that accompanies the application sets out the process by which the search for a crematorium site was undertaken, the need for the use in this location already having been established. That assessment identifies the land shown outlined red in the plan below to be preliminary the search area for the proposed crematorium, excluding those areas hatched brown, which are the existing built up areas (plus buffer zone) or major developed sites.



Catchment area map with existing built areas and the South Downs National Park shown hatched. The hatched areas are therefore inappropriate for the proposed use

9.9 The Alternative Sites Assessment report next goes on to identify that the primary area of search for the development is that shown below. This excludes areas from the wider search zone that are either too close to the existing crematoria at Chichester and Worthing, subject to flood risk or generally inaccessible.



Local Plan Proposals Map extract with the search area overlaid.

- 9.10 No land was identified as being available and suitable for a crematorium by the Applicants except for the land on the southern side of the A259. Much of this land is, like the application site, within the flood zone and therefore no more sequentially preferable in flood risk terms than the application site.
- 9.11 In landscape terms the proposed development site is considered to be the most appropriate location within the parcel of land on the southern side of the A259 that is available to the applicants. All of the neighbouring land that falls outside of the flood zone now will fall within the flood zone once flood levels are adjusted accounting for climate change (see the FRA report). Therefore, none of that adjacent land is sequentially preferable to the proposed site.
- 9.12 On the basis of the above considerations it is therefore concluded that the proposals pass the sequential test in this case. No alternative reasonably available appropriate sites for the proposed development have been identified in areas of lesser flood risk.

The Exceptions Test

- 9.13 Having subjected the proposed development to the sequential test in accordance with National Planning Policy it may next necessary to apply the 'Exceptions Test' to the development, as set out in paragraph 159 of the NPPF. In this case however, a crematorium use is a 'less vulnerable' use in flood risk terms, and applying that to the Flood Risk Vulnerability Classification Chart, copied below (accessed at <https://www.gov.uk/guidance/flood-risk-and-coastal-change#Table-3-Flood-risk-vulnerability>), this confirms that the Exceptions Test is not required in this case, less vulnerable uses being acceptable within flood zones 2 and 3a.

Flood Zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception Test required	✓	✓	✓
Zone 3a †	Exception Test required †	✗	Exception Test required	✓	✓
Zone 3b *	Exception Test required *	✗	✗	✗	✓*

Flood risk vulnerability classification chart

Flood Risk Management through design

- 9.14 The proposed building has been designed with its ground floor level at an appropriate height, 4.64m AOD, such that it will be free from the risk of flooding. Additionally, the building will be designed to mitigate against future flood risk through the use of appropriate construction methods, and a detailed flood risk management strategy can be agreed prior to commencement of development through condition.

10. Conclusion

- 10.1 In accordance with the NPPF, consideration needs to be given as to whether the proposals constitute sustainable development, for which there is a presumption in favour of planning permission being granted. In this case the proposals are sustainable for the following reasons:
- From an economic perspective, the proposal will make an efficient use of this accessible site;
 - From a social perspective, the proposal will provide modern, purpose-built crematorium facilities which are of an appropriate design and will respond well to the character of the area, and shall be accessible to the residents of the Bognor Regis and Littlehampton areas where there is an identified need for an additional crematorium; and,
 - From an environmental perspective, the proposal shall preserve the character and appearance of the area, using natural resources, in this case land, landscaping and materials, efficiently to create a much-needed new crematorium within the LPA plan area in an accessible location.
- 10.2 The proposed development accords with the relevant policies of The Arun Local Plan and Climbing Neighbourhood Plan, as set out in Sections 5 and 6 of this Statement. It supports the overall aims and objectives of the Local Plan which include: supporting sustainable, safe and healthy communities with accessibility to a range of services and facilities; protecting and enhancing the outstanding natural and built environment, including its landscape and the local distinctiveness of places within the area; and achieving high-quality and sustainability in design, reflecting the local character and distinctiveness of the area.

- 10.3 It is therefore considered that the planning justifications and design rationale identified in this Planning, Design and Access Statement demonstrate that the proposed development is acceptable.