
Alternative Sites Assessment

Prepared in support of a planning application for the proposed development of a crematorium facility with associated parking, access and landscaping at;

GREVATTS LANE, CLIMPING

On Behalf of

The Southern Co-op

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1.0 INTRODUCTION

- 1.1 This Alternative Sites Assessment report is submitted in support of a planning application made by The Southern Co-op for the construction of a crematorium and associated development on land located south of Grevatt's Lane, Climping, West Sussex. The purpose of the proposed development is to create a new, modern crematorium facility in the area, for which a need has been established (as set out in the accompanying needs report).
- 1.2 There is no planning policy basis to require an assessment of alternative sites as part of a planning application submission for this type of development. However, given the location of the site within the countryside it is considered helpful to explain the rationale for the site's selection as a part of the planning application submission.
- 1.3 Prior to embarking on preparing this planning application The Southern Co-op had been actively engaged in trying to find a suitable site for a new crematorium in this area for some time, having previously identified a need for it. There is a gap in crematorium provision within this area, the nearest existing crematoria's being situated at Chichester and north of Worthing. The Council's Local Plan does not allocate any sites for new crematoriums.
- 1.4 The land south of Grevatt's Lane, Climping has been selected for the proposed use following the comprehensive site search undertaken by the Applicants. That site search was informed by;
- A detailed understanding of the locational requirements of the crematorium,
 - Where a crematorium would be functionally of most need,
 - Planning policy constraints, and
 - Land availability.
- 1.5 This report should be read in conjunction with the Planning Statement and Needs Assessment Report that also accompany the application. The reports form a comprehensive package of information that together set out the background to and justification for the proposed development.

2. THE PROPOSED DEVELOPMENT

- 2.1 The Southern Co-op have identified a need for a new crematorium premises within this area. That conclusion is based upon an assessment of local demographics and the high demand placed on the nearest existing crematoria. That need for new crematorium capacity is discussed more fully in the needs report that accompanies the application. The Applicants therefore consider that there is a need for an additional crematorium facility within this area. Following an extensive site search, the scope of which is set out in this report, the land south of Grevatts Lane, Climping is considered to be the most suitable option for the proposed use.



The proposed site plan

- 2.2 It is envisaged that the crematorium building will be situated centrally within the site and comprise a predominantly single storey complex. The building would be designed to be

unobtrusive in the landscape, achieved through a combination of a low scale and use of appropriate elevational treatment.

- 2.3 The building will be set well away from Grevatt's Lane by circa 150 metres. To the front of the building a car park will be provided. The main car park will be hard surfaced and provide for circa 100 car parking spaces. Around the outside of the car park a driveway will be provided for use of hearses etc
- 2.4 In addition to the main car park an overflow car park will be provided for an additional circa 60 cars.
- 2.5 It should be stressed that the 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 only 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.
- 2.6 Aside from the building and the parking areas the proposals would involve landscaping of the remainder of the site. Such landscaping for the most part would involve low level shrubs and ornamental feature trees. The overall landscaping scheme would be devised to offer mourners a tranquil and attractive landscaped space in which to lay ashes and memorials.
- 2.7 The site is one that is large enough to provide a crematorium and landscaped grounds of the type proposed. The crematorium will provide a necessary facility in this part of West Sussex.

Description of the application site

- 2.8 The site is located at the A259 Grevatt's Lane, circa 2km east of Climping in West Sussex. The land has previously been in use for agricultural purposes.
- 2.9 The site is located in a semi-rural location and is surrounded on all sides by agricultural land on what is otherwise a relatively undeveloped space between Bognor Regis and Littlehampton. There are, however, exceptions to that, including a small commercial estate approximately 300m to the east along Grevatt's Lane (seen in the aerial photograph 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. The site is bounded on three sides by established hedgerows and tree belts.



Aerial view of the site (www.google.co.uk)

- 2.10 The site is flat and greenfield. By reason of its former agricultural use most of the site is free of any significant landscape constraints with the exception of the hedges and trees at the field boundaries. The site has scope for a direct vehicular access from the A259 Grevatt's Lane, in a position that can have good visibility in both directions such that highway safety on the road could be ensured. The landscaping that already exists around the margins of neighbouring fields and at the edge of the highway is such that the site is well screened in longer distance views.



View of the site as seen from Grevatts Lane (www.google.co.uk)

3. RELEVANT PLANNING POLICY

The National Planning Policy Framework

- 3.1 At the heart of the National Planning Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking (Paragraph 14). For decision taking this means approving development proposals that accord with the development plan without delay, and where the development plan is absent, silent or relevant policies are out of date, granting planning permission unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework as a whole.
- 3.2 Paragraph 17 of the NPPF sets out 12 Core Planning Principles. Those that are of relevance to the application proposals include;
- Planning should '*proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs*'.
 - Planning should '*support the transition to a low carbon future in a changing climate*'.

- Planning should *‘actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus development in locations which are or can be made sustainable’*.

4.0 SITE REQUIREMENTS

- 4.1 The site assessment process has sought to identify which is the most appropriate site for the proposed use and whether there are any suitable, available and viable alternative sites for the development that may be in more preferable locations.

Site Requirements

- 4.2 Guidance on The Siting and Planning of Crematoria, published in 1978, was issued by the Department of the Environment *‘to assist local authorities and others contemplating the construction of crematoria’*. The document states that the main principles to be observed when siting new crematoria are;
- (a) that the site is well suited for the building, and is accessible by public transport, and, normally, that all main services are available;*
 - (b) that the crematorium is so sited that its use does not have any material effect on the immediate neighbourhood;*
 - (c) that the layout of the site provides for the easy movement of vehicles to and from the building, and adequate parking space;*
 - (d) that the building should be so planned as to allow convenient circulation;*
 - (e) that proper amenities are provided for those attending or working at the crematorium;*
 - (f) that the cremation room and its ancillary rooms and spaces comply with good practices and permit cremation to be carried out in a reverent and dignified manner.*
- 4.3 Additionally to the above the 1902 Cremation Act states that new crematorium buildings should be sited not less than 200 yards of existing houses, unless the residents of existing houses within the 200 yard area have given consent. Nor should a crematorium building be located within 45 metres of a public right of way.

- 4.4 In selecting a site for the proposed development the applicants have sought to be flexible in terms of both format and scale. Such flexibility may, for example, include providing fewer parking spaces where accessibility makes that feasible, or constructing a two-storey building to reduce footprint where required. However, flexibility does not exist to change what are the essential components of a crematorium, in particular the need for a spacious and well landscaped setting, which is essential in ensuring an appropriate and tranquil setting for the services and remembrance, and a suitably sized chapel building to enable dignified end of life services. As a result therefore, almost all modern crematoria have been built at the edges of existing settlements rather than within them.
- 4.5 It is pertinent to note that crematoriums typically generate lower land values than more intensive types of development such as residential uses. Therefore, in edge of town locations where there is a prospect of future residential or commercial development land owners will often therefore decline offers from crematorium operators in the hope of larger returns from more valuable alternative developments in the longer run. This is a factor that complicates the site finding process for the Applicants.
- 4.6 The relevant question is therefore whether the site selected is the most suitable in planning policy terms but that is still suitable for the development proposed by the applicant, and available in the first place.

The Southern Co-op's Site Search Criteria

- 4.7 In order to carry out the site search it was necessary to identify the minimum site requirements for the proposed development, as that is a starting point for defining what sites are reasonable alternatives. In this case the minimum site requirements are;
- A site area of at least 4 Ha, which is considered the minimum necessary to provide sufficient space for a crematorium building, car parking and landscaping,
 - Appropriate access (direct access to highway and other established infrastructure)
 - The site should be free of any significant on site ecological or topographical constraints, and
 - A separation of at least 200 yards between the crematorium building and clusters of existing houses. Under the Cremation Act 1902 no crematorium can be

constructed nearer to any dwelling-house than two hundred yards, except with the consent, in writing of the owner, lessee and occupier of that house. Such agreement is difficult to obtain from multiple residential properties.

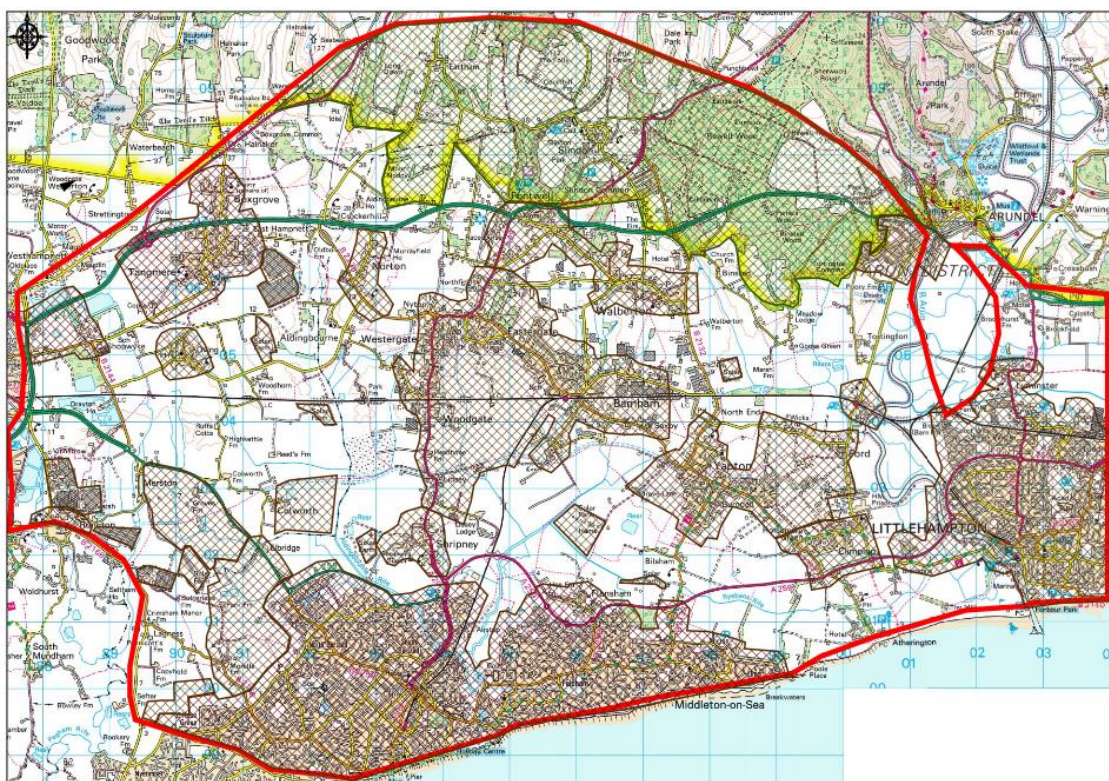
5.0 IDENTIFICATION OF SITE SEARCH AREA

- 5.1 As has been identified in the Needs Assessment Report that accompanies the application, the proposed use is one that aims to draw customers from the surrounding towns and villages, but it is considered that the main concentration of demand will originate within a 25-minute driving time from the site. That zone is therefore considered to be an appropriate starting point for the purposes of this assessment. The extent of the zone is shown on the map below.



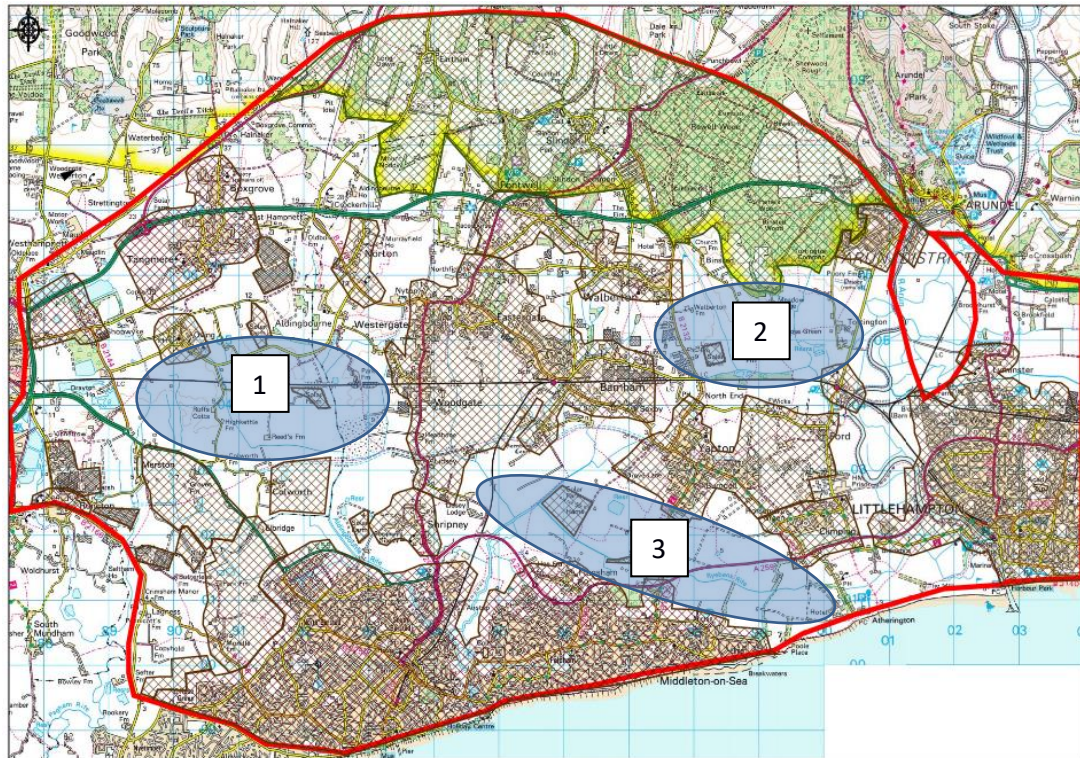
- 5.2 In order to closer define areas of search for the site it was then necessary to discount existing urban areas, villages and hamlets within the catchment area, inclusive of a 200-yard buffer zone around them allowing for the limitations set out in the 1902 Cremations Act. In doing so the proposed urban extensions that have been allocated in the recently adopted Chichester Local Plan and Arun Local Plan were also excluded, as that land would no longer be available for crematorium use.

- 5.3 It was also necessary to identify sites that are already developed with non-residential development, for example solar farm sites. Finally, as the northern part of the catchment area falls within the boundary of the South Downs National Park that area was discounted due to the sensitivity of the landscape. The eastern and western extremes of the catchment area were also discounted on sustainability grounds as a central location would be more appropriated to serve the resident population. The result of these constraints is shown on the plan below;



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

- 5.4 It is clear from the map shown above that much of the catchment area is already covered by built development and must therefore be excluded from this assessment. Large parcels of land at the edges of Bognor Regis, Yapton\Climping and Eastergate\Westergate are also due to be developed in coming years and must therefore also be discounted. However, the map does reveal three potential areas of search that are generally freer of built constraints, as highlighted below;



Broad areas of search identified from the initial constraints search

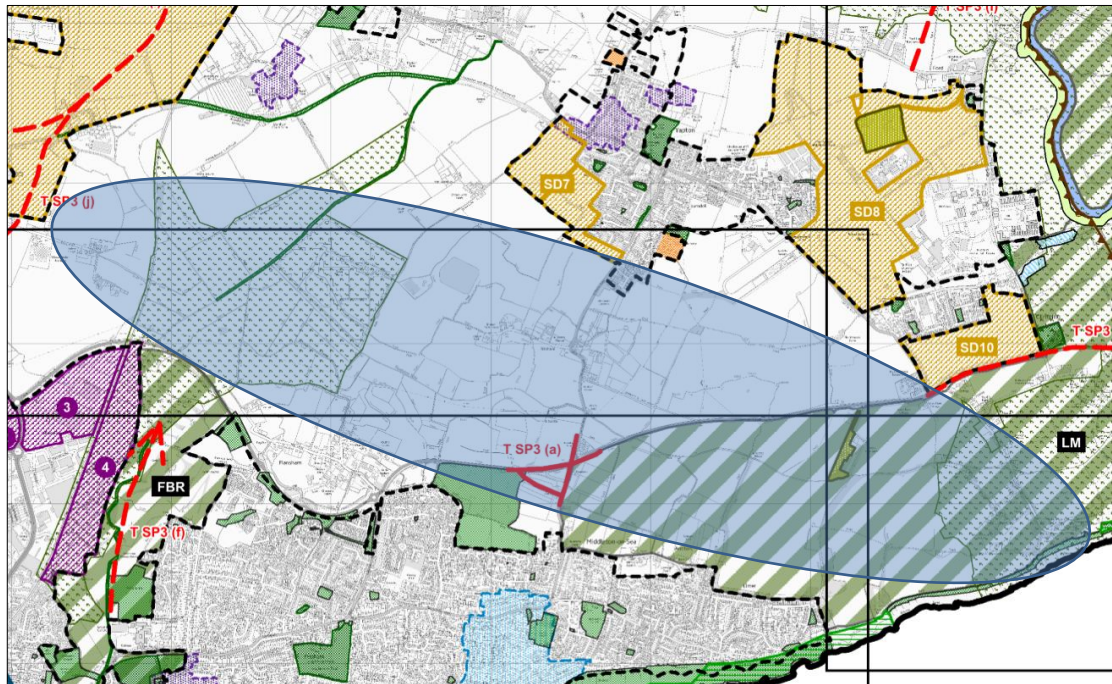
Assessment of the identified areas of search

- 5.4 Search zone 1 is located north of Bognor Regis and east of Chichester. The area is relatively undeveloped and for the most part open farmland. Road links across this area of search are limited except for the main routes of the A259, Drayton Lane and Oving Road. There are no significant topographical constraints in the area and the majority of it is free of flood risk.
- 5.5 Search zone 1 has the disadvantage of being located relatively close to Chichester Crematorium. A new crematorium in this area would therefore not represent the most sustainable pattern of development because a gap in provision would still exist between Bognor Regis and Littlehampton.
- 5.6 Our searches have not identified that any land in or around search zone 1 is presently available.

- 5.7 With regards to search zone 2, road links in this area are generally limited to single width lanes, the exceptions to that being Yapton Lane and Ford Road which dissect the search area in a north south direction. The land on the east side of Ford Road is almost entirely within flood zone 3 whilst that on the west side of Yapton Lane for the most part already developed. This search zone is therefore restricted to the area between Yapton Lane and Ford Road.
- 5.8 Our searches have not identified any land in or around search zone 2 is presently available. Of further note, search zone 2 is towards the edge of the catchment area and therefore a crematorium development here would not represent a sustainable travel option for residents of Bognor Regis.
- 5.9 Search zone 3 is the area that may be identified as the space that sits between Middleton on Sea from Yapton and Climping. Urban extensions are proposed to both Yapton and Climping and those areas should therefore be discounted from any site assessment.
- 5.10 In common with search zones 1 and 2, search zone 3 is mostly farmland and access restricted to single width lanes. Exceptions to this are the A259, Blisham Road and Yapton Road. Part of this area is an identified area of flood risk.
- 5.11 Search zone 3 has a clear advantage over search areas 1 and 2 in sustainability terms, sitting as it does between Bognor Regis and Littlehampton and also close to Climping, Yapton and Barnham, the latter three of which are all projected to grow under housing allocations in the new Local Plan. This area is therefore considered to represent the option offering the lowest travel times and distances. It is also better spaced between the existing crematoriums at Chichester and Worthing.
- 5.12 It is therefore concluded that search zone 3 represents the most appropriate and sustainable opportunity to provide a new crematorium.

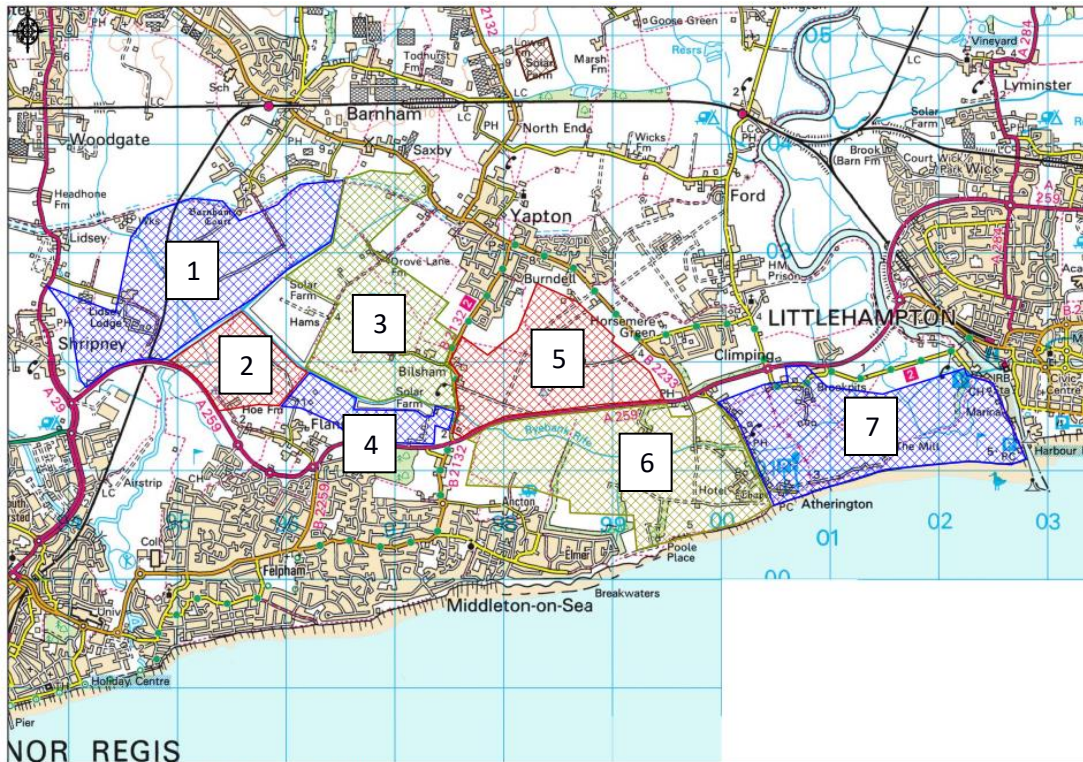
6.0 DETAILED SITE SEARCH

- 6.1 Shown below is an extract from the Arun Local Plan Proposals Map showing a more detailed view of the selected search area and planning policy constraints therein, on which the broad extent of the search area is shown over in blue.



Local Plan Proposals Map extract with the search area overlaid.

- 6.2 At a more detailed level, and in order to assist with the site selection process the search zone was further split into seven sub-areas, as shown on the plan below, and a site search undertaken for each sub-area. The boundaries of these sub-areas are somewhat arbitrary, but nevertheless provide a good starting point for the site selection process.



Area 1 search

- 6.3 Area 1 is located at the north western edge of the search zone. The land is flat and does not contain any significant landscape constraints. The land is dissected by a railway line, however, access to land on the eastern side of the railway line is made difficult to access from the A29 as a result. Access from the A259 at the southern edge of this area is made difficult by the raised carriageway over the railway line, and from the north access is only possible via Church Lane or Hill Lane in Barnham, but both of those are single width roadways that already serve multiple properties. Therefore, on grounds of access difficulties the land in area 1 on the east of the railway line was discounted.



View looking over sub area 1 from the raised carriageway on the A259 (www.google.co.uk)

- 6.4 The land on the western side of the railway line in area 1 is in principle less constrained in access terms, although Sack Lane is also of single width only so a preferable solution would be a site closer to the A29 and accessed directly from that. A portion of this land falls within flood zone 3 and the southernmost section falls within an archaeological notification area, although in theory a suitable site could be found here if sufficient clearance from the residential properties could be achieved. However, research did not identify any of that land to be available.

Area 2 search

- 6.5 Area 2 is bounded by the A259, a watercourse, the solar farm at its northern edge and the village of Flansham. This area is low lying and approximately half falls within flood zone 3 (see below). The raised carriageway on the A259 would be a barrier to access to the western edge of this area, although not to the east where there is already an agricultural access in place and that could theoretically be upgraded.



Flood zone map for search area 2 (Environment Agency Website), and view from the A259 (www.google.co.uk)

- 6.6 Our research did not identify any of the land within area 2 to be available. It is of further note that this land parcel falls within Yapton Parish and is predominantly grade 1 and 2 agricultural land (source: www.magic.defra.gov.uk). Policy E1 of the Yapton Neighbourhood Plan prohibits any development of grade 1 and 2 agricultural land except for housing purposes in certain instances. Therefore, a crematorium development on that land would be discounted due to conflict with planning policy.

Area 3 search

- 6.7 The area 3 search area may be loosely defined as being that land lying to the west of Yapton. This land is again flat and relatively unconstrained topographically, although there is a covered reservoir towards the centre of this search area that would be discounted. Again, the farmland at the centre of this search area is relatively inaccessible to anything other than agricultural vehicles and therefore the most suitable sites here would either fall on the western side of Bilsham Road (the B2132) or, at the north of this area, from the B2233.
- 6.8 Our research did not identify any of the land within area 3 to be available.
- 6.9 It is of further note that this land parcel falls within Yapton Parish and is predominantly grade 1 and 2 agricultural land (source: www.magic.defra.gov.uk). Policy E1 of the Yapton Neighbourhood Plan prohibits any development of grade 1 and 2 agricultural land except for housing purposes in certain instances. Therefore, a crematorium development on any grade 1 and 2 agricultural land within search zone 3 would be discounted due to conflict with planning policy.

Area 4 search

- 6.10 Area 4 is bounded in the north by Ryebank Rife and in the south by the A259. Most of this land is occupied by an egg farm and was not identified as being available.
- 6.11 Like parcels 2 and 3, this land parcel falls within Yapton Parish and is predominantly grade 1 and 2 agricultural land (source: www.magic.defra.gov.uk). Policy E1 of the Yapton Neighbourhood Plan prohibits any development of grade 1 and 2 agricultural land except for housing purposes in certain instances. Therefore, a crematorium development on that land would be discounted due to conflict with planning policy.

Area 5 search

- 6.12 Area 5 is that land to the north of the A259 Grevatts Lane and east of Bilsham Road (the B2132). The land is flat and free of any significant topographical constraints, and may be

accessed from the A259, Bilsham Road or Yapton Road. As for all other search areas a preferable site in this zone would be one that is relatively close to one of these roads.

- 6.13 The eastern part of this search area is somewhat exposed due to an absence of established field margins as is the case for much of the remainder of the search area. Consequently, a development in this area could have a significant visual impact, although that is something that could potentially be mitigated against through appropriate design and landscaping treatments.



Views of search area 5 (www.google.co.uk)

- 6.14 Like parcels 2 and 3, this land parcel falls within Yapton Parish and is predominantly grade 1 and 2 agricultural land (source: www.magic.defra.gov.uk). Policy E1 of the Yapton Neighbourhood Plan prohibits any development of grade 1 and 2 agricultural land except for housing purposes in certain instances. Therefore, a crematorium development on that land would be discounted due to conflict with planning policy.
- 6.15 As at July 2019 a current planning application has been submitted for the construction of a crematorium on land north of Grevatt's Lane, at the southern edge of area 5. That land is therefore not available to the Applicants. That application is understood to be being made on a speculative basis rather than by the end operator though, so eventual delivery of that site could not be guaranteed. In any event, the site is noted to fall on grade 2 agricultural land and a development for crematorium purposes will therefore conflict with policy E1 of the Yapton Neighbourhood Plan, and should be discounted on that basis.
- 6.16 Our research did not identify any of the land within area 5 to be available.

Area 6 search

- 6.17 Area 6 is that land on the southern side of the A259 and to the west of Climping Street, which leads south to the village of Atherington. This land is flat and there are no apparent topographical constraints.
- 6.18 Whilst most of the land within area 6 is used for agricultural purposes, which is common with the majority of the other search areas, there is a noticeable difference in that there are established and substantial tree belts along some of the field margins, including along Ryebank Rife. In addition, and particularly so for the eastern half of this search area, the verge of the A259 has a denser and more established hedge and tree belt. This land is therefore less open to views than much of the other search areas.



Aerial view of the site with treed field margins highlighted

- 6.19 Part of this land is understood to be classified as higher-grade agricultural land. However, this land falls within Climping Parish, and unlike land within Yapton Parish the relevant neighbourhood plan policy here (policy CPN10 of the Clymping Neighbourhood Plan) allows for all development types on such land where a need is demonstrated and the proposal conforms to other planning policies.
- 6.20 Parts of this land are also understood to fall within flood zone 3b, and those areas should be discounted on grounds of flood risk.



Environment Agency flood map for area 6

- 6.21 On the basis of the site constraints it is concluded that the most suitable locations in this area would be at its northern edge where outside of flood zone 3b and also close to the A259. Climping Street is considered unsuitable to accommodate the traffic from a crematorium and therefore the south eastern part of this search area was discounted on that basis.
- 6.22 Contact was made with the land owner, who owns almost all of the land within this search zone, and it was confirmed that the land is available.

Area 7 search

- 6.23 The final search area was that on the southern side of the A259 and to the east of Climping Lane. This land shares characteristics with area 6 but a greater proportion of it is subject to flood risk, as shown below,



Environment Agency flood map for area 7

- 6.24 The eastern part of area 7 is low lying and open and a crematorium in that location would therefore be visually prominent, whilst the south western corner is difficult to access. The north eastern corner of this zone would therefore represent the only viable option here.
- 6.25 Contact was made with the land owner, who owns almost all of the land within this search zone, and it was confirmed that the land is available.

Final Site Selection Process

- 6.26 As the above paragraphs have explained, search zones 6 and 7 were identified as having most scope, for two reasons. First, this land sits directly between Bognor Regis and Littlehampton and therefore is most sustainable in terms of being equidistant between the two urban areas that can be expected to generate most demand. Additionally, the northern part of these areas has good access directly off of the A259. Finally, there is a willing land owner.
- 6.27 It is pertinent to note that areas 6 and 7 fall within a designated settlement gap as defined in the Arun Local Plan, whereas the land on the north side of the A259 does not. Whilst that may in some instances be construed as a disadvantage, it may have helped to make this site available because the landowner is less inclined to view the land as having residential or commercial development potential in the future. Additionally, a crematorium in this location is more likely to retain its countryside setting in the longer term than would be the case on the north side of the A259.
- 6.28 In terms of selecting the final site for the proposed crematorium from those spaces within search areas 6 and 7, the application site was selected for the following reasons;
- It already has a vehicular access from the A259.
 - It is almost well removed from the settlement edges of both Bognor Regis and Littlehampton, meaning that the integrity of the settlement edges to both towns will be unaffected.

- It is well removed from residential properties, with none at all being located within the 200 yard distance within which written consent from owners would be needed,
- The established field boundaries, including the tree belt at the southern edge give this site a stronger degree of visual containment than most of the surrounding land.

7.0 CONCLUSIONS

- 7.1 This alternative sites assessment provides an explanation of the site selection process undertaken by the Applicants and that informed the eventual decision to apply for planning permission to construct a crematorium on the selected site at land south of Grevatts Lane, Climping.
- 7.2 It is acknowledged that the land falls within the defined settlement gap between Bognor Regis and Littlehampton. It is, however, relatively more visually contained than some of the other search areas by reason of hedgerows and tree belts. It is also in possibly the best location in the entire search area by virtue of being on the main road between the two largest centres of population within the catchment area for the proposed crematorium. Finally, it is also large enough for the proposed use, with direct access onto the A259, and fundamentally, the land is known to be available. Its availability is in contrast to other parts of the search zone where land owners may either have no aspiration towards a land sale, or alternatively be holding out with a view to a potential higher value land sale in future years.
- 7.3 It is concluded that on the basis of the site search process undertaken by the Applicants that the proposed site represents the most viable, accessible and sustainable site for a crematorium in the search area.