

From: Simon Davis

Sent: 02 July 2019 13:02

To: Lisa Jackson [REDACTED]

Cc: Andrew Tice [REDACTED]

Hanson [REDACTED]

Emma Randall [REDACTED]

Paul

Subject: RE: Application Y/103/18/PL

Dear Lisa,

I have discussed your email with my team leader and with our legal team.

I consider that we could amend your Construction Management Plan condition to add in a clause to refer to the need for a "Soil Management Plan/Strategy, including the reuse of potentially contaminated recycled building materials onsite and any importation and storage". I have taken this wording from an application I found on the internet concerning a major development at Cambridge University.

However, the advice from others is that we will still require you at the very least, to provide a letter setting out how you comply with the requirements of the policy

Kind Regards

Simon J Davis MRTPI | Principal Planning Officer, Planning Department, Directorate of Place, Arun District Council |

Location: Planning, First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

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Please note that I typically work from home on Thursdays when I am unreachable on my work phone

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Save the environment - think before you print.

From: Lisa Jackson [REDACTED]

Sent: 28 June 2019 16:06

To: Simon Davis <Simon.Davis@arun.gov.uk>

Cc: Andrew Tice [REDACTED]

Hanson [REDACTED]

Emma Randall [REDACTED]

Paul

Subject: Re: Application Y/103/18/PL

Dear Simon,

Many thanks for your email confirming that the legal team agree that there is no need for sequential test for this application.

With regard to policy SODM1 - this has already been addressed in the planning statement on pages 12 and 20 and in the planning balance considerations at paragraph 16.19 of the statement. The assessment confirms that the need for the crematorium far outweighs the need for protection of the soils on this site and is therefore in compliance

with the policy. Only a small portion would be permanently lost from future production. Soil stripping and retention will preserve the best soils on site for the planting areas of the landscape scheme. Given the limited availability of sites available for this use shown by the alternative site search and by the Southern Co-op's sequential test and the locational limitations imposed by the 1902 Cremation Act it is clear that no other alternative site exists on land with lower quality soils.

The Construction Management Plan, to be secured through a planning condition, will ensure that the soil resources from the development site will preserve the soil resource, such that it can be incorporated into a Productive Green Environment to meet the requirements of the planning policy.

Furthermore in terms of contribution to the local economy, of which the soils is part of the consideration, the application site forms only a tiny amount of the overall farming business.

I can confirm from the Lettuce Company who last harvested a crop from the site generated a profit from the total field of [REDACTED] per hectare which in this case was [REDACTED]

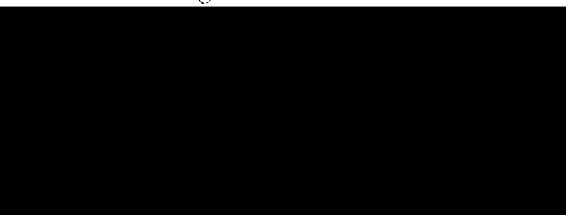
In terms of economic loss this is tiny by comparison to the jobs/income from the Crematorium and income to the local supply chain (florists/hotels/ pubs) — generated by the use of this facility.

The planning balance in terms of sustainable development NPPF 8a) in terms of the economic objective supports growth and improved productivity as this is considered one of the three overarching objectives where there should be a net gain. It is clear in terms of productivity from this site there would be a significant net gain in economic terms that far outweighs the economic benefit from the direct use of the soil resource. Given the other significant benefits to meet a demonstrable need, this far outweighs any minor loss of best and most versatile soils.

I hope the above is helpful but should you feel we need to go further to meet the requirements of d-g of policy SO DM1 please let me know.

Kind regards,
Lisa

Lisa Jackson
Jackson Planning Ltd



On 28 Jun 2019, at 12:05, Simon Davis <Simon.Davis@arun.gov.uk> wrote:

Dear Lisa,

Thank you for sending this through.

In relation to the sequential testing issue, I have now had final advice from our legal team. They are of the opinion that there is no need for sequential testing for this application. They state that the applicant has confirmed the lease with the operator is for a maximum of 90 years and in addition they will accept an additional clause within the s106 that requires the removal of the building by 2110 if future flood risk assessment confirms the site remains at risk of flooding. Furthermore, the

applicants for the Climping crematorium undertook a sequential test for basically the same area which concluded there were no other preferable sites and therefore presumably the same information would be obtained. I have today instructed legal to add in the new clause to the Section 106.

However, I also need you to consider further our policy SO DM1 and the requirements of it. We have recently had advice from legal regarding a different application and how the policy is interpreted. The second half of the policy states that where development is permitted, certain reports, assessments and mitigation measures need to be put forward. It is our view that these should be provided regardless of whether the proposal is considered to be in accordance with or in conflict with the first half of the policy. I would therefore request that you consider these aspects and I would suggest that you will need to provide us with a further report.

The next available Committee Meeting will be the 7th August and the agenda closes on 22 July therefore there is time to provide these.

Kind Regards

~~Simon J Davis~~ MRTPI | Principal Planning Officer, Planning Department, Directorate of Place, ~~Arun District Council~~ |
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