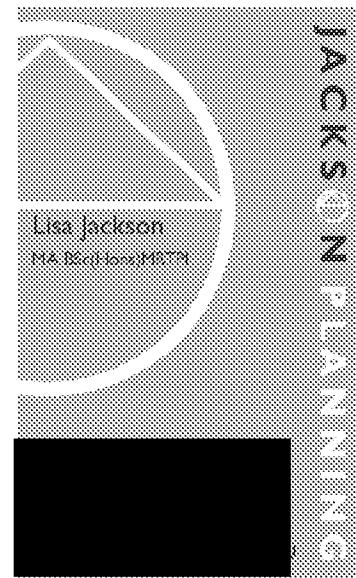


By email only

Copies to Andrew Tice, Emma Randall - Landlink

July 17, 2019

Simon Davis
Arun District
Council Offices
Maltravers Road
Littlehampton
West Sussex
BN17 5LF



Dear Simon,

Planning Application Y/103/18/PL Crematorium Proposal, Grevatts Lane West

I refer to your email of 24 June regarding the need to demonstrate that the application will comply with policy SO DMI and in particular with regarding the protection of soil resources.

As you set out in your email as the site for the proposed Crematorium is not designated in either the Local Plan or the Neighbourhood Plan it is necessary to consider if the policy requirement to protect the most versatile land is outweighed by the need for the development. In addition, the policy requires the consideration of options and appraisals to show that this issue has been fully considered in the planning balance.

In terms of the availability of land of lower agricultural quality for the proposal, the need assessment accompanying the planning application has shown that through an extensive site search of alternatives no other sites were available that were located on land:

1. At a lower flood risk
2. That was outside the strategic gap
3. Would meet the 1902 Crematorium Act Locational criteria

Therefore, the test in relation to need for the proposal in relation to agricultural land quality has been met, as this is the preferred site for the development that has a proven need. In this respect sustainability and options appraisals for soils are unnecessary as the limitations on location of the development provide no other alternative site.

In order to satisfy the further requirements of the policy the applicants have commissioned soil specialists Tim O' Hare Associates who are preparing detailed documentation to support the application. They have been commissioned to provide an assessment of the existing ground conditions in the form of a Soil Resource Survey.

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The full report will be submitted by 22nd July however the interim results following intrusive site investigation have revealed the following.

Caveat 'e' of the policy cites DEFRA's *Soil Strategy for England* – this was issued in 2009 under the title of *Safeguarding our soils – A strategy for England (2009)*. The document refers to the DEFRA *Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (CoP)*.

The CoP aims to improve the use and management of soils through all stages of the construction process including re-using or recycling topsoil where appropriate. In terms of 'site appraisal', the *Pre-construction Planning* section of the CoP describes the need for a *Soil Resource Survey* in order to identify the site topsoil and subsoil resources - to be carried out on the site by a suitably qualified and experienced soil scientist or practitioner and prior to any earthworks operations. The *Soil Resource Survey* will inform the production of the *Soil Resources Plan* for the development (item g).

A summary of the initial findings by Tim O'Hare Associates are as follows (*Site Observations* and *Soil Descriptions*) from the *Soil Resource Survey* is provided below:

Site Visit

The site work was conducted on the 9th July 2019 during a period of warm, dry weather.

Site Observations

The site was roughly rectangular in shape, reasonably level, without noticeable micro-topography or built structures. Boundaries consisted of hedges to the north, east and south, whilst the western edge was unbounded. Vegetation consisted of moderately dense colonisation by a variety of annual and perennial weeds.

No evidence of soil disturbance was recorded other than from normal agricultural activities. Shrinkage cracks and subangular flints (up to 90mm in diameter) were present over the entire site surface.

Soil Descriptions

They examined the soils by constructing a total of 12 No. hand-dug trial holes (TH) at representative locations within the survey area. Trial holes were dug to a maximum depth of 1000mm where possible. The locations of our trial holes are indicated on the site plan in Appendix I (attached).

At each trial hole, the soils were examined with reference to the Soil Survey Field Handbook. Important physical soil characteristics were recorded, including texture, structure, compaction, waterlogging, anaerobism, topsoil depths, stone content and the presence of deleterious materials. At the same time, representative, composite soil samples were taken for laboratory analysis.

A single typical soil profile was encountered during the site visit which was described as below:

Topsoil	Brown (Munsell Colour 10YR 4/3), dry to slightly moist, friable, non-calcareous SILTY CLAY LOAM to CLAY LOAM [provisional] with a poor to moderately developed structure. Upon disturbance, the soil broke into a weak fine to coarse granular to subangular blocky structure.
GL – 290/330mm	
Average depth: 320mm	Moderately stony including occasional sub-angular flints up to 90mm in length. No observable deleterious materials.
Subsoil	Yellowish brown to light brownish grey (Munsell Colour 10YR 5/6 – 6/2), slightly moist, slightly plastic SILTY CLAY LOAM to SILTY CLAY [provisional] with a moderately developed, sub-angular blocky structure. Virtually stone-free to slightly stony and no observable deleterious materials. Ochreous mottling and manganese concretions throughout and becoming stronger with depth.
290/330 – 1000mm	

Jackson Planning Ltd Registered in England 7234111 Director Lisa Jackson MRTPI MA BSc

The detailed results of the soil resource survey will inform the production of a soil resources plan for the development this document has been prepared in accordance with the DEFRA construction code of practice for the sustainable use of soils on construction sites (September 2009), which supports DEFRA's Soil Strategy for England. It is anticipated that the Council will impose a performance condition requiring construction to be carried out in accordance with the submitted soil resource plan.

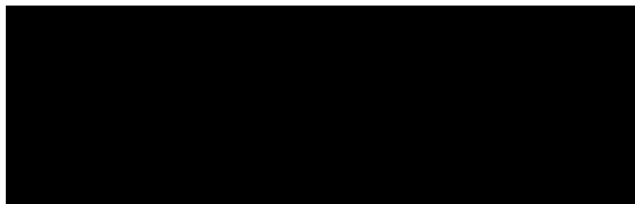
The soil resources plan covers the following items including: intensive soil handling including topsoil stripping, storage and re-spreading operations. These management practices will guide the site work and landscape operations of the development in order to preserve the site soil resource and effectively mitigate the potential temporary harms to the soil resource. The soil resources plan will include:

- Existing vegetation treatment
- Soil handling practices
- Topsoil stripping
- Topsoil and subsoil stockpiling
- Stockpile management
- Soil re-spreading methods
- Soil depth for each landscape type
- Subsoil and topsoil cultivations
- Soil ameliorants (types, application rates)

Langmead Farm management have produced have produced a calculation of the productivity of the land using the methodology for gross margins as set out in the Arun Soils and agricultural land assessment report, this is provided under separate cover.

I believe the above information and subsequent detailed reports fully satisfy the requirements of the planning policy DMSO I.

Yours sincerely



Lisa Jackson MA BSc MRTPI

Enclosure – Letter from Langmead Farms regarding Gross Margin Calculation