



**MID SUSSEX
DISTRICT COUNCIL**

Agenda Update Sheet

District Planning Committee

Date 17th December 2020

Agenda Item 6:

Recommended for Refusal

APPLICATION NO: DM/20/2877

P.11 CONSULTATIONS and P.74 APPENDIX B – CONSULTATIONS

WSCC Minerals & Waste Planning Authority

This response follows a request for additional information (Mineral Resource Assessment, MRA) made by the MWPA on the 3rd September, 2020. The request for further information has been fulfilled, and the MWPA would offer the following comments:

The submitted MRA includes analysis of the underlying mineral horizon by way of interpretation of the boreholes dug when assessing the viability of the site for natural burial methods. Six boreholes identify that the underlying sandstone varies from 2 -3.7m beneath ground level across the site. The quantity of this resource remains unknown, however it is suggested that the sandstone would likely be inconsistent in quantity due to fluctuations in its carbon content. Demand of the resource should therefore take priority in order to identify whether further investigative measures are required.

The report draws upon the Historic England/BGS Stone Study when investigating previous extraction sites and potential users of this resource. The nature of extraction in the area has historically been via localised quarries and sandpits, and the scarcity of remaining buildings that use the resource (identified as 3, including the church of St Leonards) suggests that the immediate demand for the mineral in the local area is low.

The MRA identifies Philpots Quarry at West Hoathly (some 3.7miles from the site) as the closest operator of the sandstone resource. This operator demonstrates a 15-25 year landbank of the resource and, given an extension to the site has been granted in 2013, the MWPA would agree that the site is likely continue to supply worked sandstone to surrounding architecture where demand dictates.

The applicant has demonstrated a willingness to cooperate with the operator as demonstrated in email correspondence shared between the two, and it is appreciated that interest in the resource may be pursued should the reserves become commercially viable as a result of the proposed works. This should be encouraged where practicable, but is not thought necessary with regard to the acceptability of the proposal.

The report concludes that, overall, the site would not be viable for extraction given its location within the AONB, the impact of unearthing commercially viable amounts of the resource on the non-mineral development and the subsequent impact any transportation of the resource would have on the countryside. Crucially, as the use of the site for natural burials is already consented, the extraction of the resource would be incompatible with this non-mineral use.

Given it has been demonstrated that the demand for Ardingly Sandstone is currently being met, and considering the valid points raised above, the MWPA would agree in this case that the viability of the site for stone extraction is low, and would therefore offer No Objection to the proposal.

Comments from applicant's agent in response to representation on behalf of Dignity Funerals Ltd (who operate crematoria at Surrey & Sussex, Crawley and The Downs, Brighton)

- Given the relatively small number of operators in the cremation market, rivalry between operators is highly apparent in the consideration of planning applications across the country
- Objection must be viewed in this context
- Case law establishes a fall-back test
- Interpretation of planning policy is misguided
- Site already has consent as a natural burial ground together with a chapel
- Clear that the Surrey & Sussex Crematorium does not meet the complete needs of the community – evidence clearly establishes it has exceeded its practical capacity
- Objector is wrong to compare footprints between permitted schemes and this
- Objector has not examined need in a fair and balanced manner, such that they are silent on the qualitative elements to the case

Comments from applicant's agent in response to consultant's analysis on the need case

- The critique confirms there is a need for additional crematorium capacity which will largely serve Mid Sussex
- The assessment does not support the objection on behalf of Dignity Funerals Ltd
- The outputs of the modelling exercise essentially agree
- Qualitative need is a critical part of any need case, including support from faith communities
- We have considered the theoretical possibility that Surrey and Sussex Crematorium could expand, but expansion is not possible at the site
- No available evidence of a more suitable site elsewhere which is capable of meeting the relevant need as set out in our application
- We would respectfully suggest that the application site is the perfect location to meet the relevant need, not just in terms of the population that would be served but also because the site has been consented for broadly comparable uses
- Despite different methodologies one of the main conclusions from Beacon Dodsworth that is critical to this application is that their analysis shows that 122,234 people live closer to Turners Hill than any other crematorium, this is very close to the PMA assessment that puts this figure at 122,916 people
- This underpins the quantitative need for the development, given current journey times to the alternatives and this would bring about a significant qualitative improvement to all 120,000+ people
- This is all entirely consistent with Policy DP25 and offers a sustainable solution to a community need in Mid Sussex

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