

Woodhatch Crematorium - Land south of Woodhatch Road, Reigate

Planning Statement

Prepared on behalf of
Reigate & Banstead Borough Council

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Contents

1.0	INTRODUCTION	3
2.0	THE SITE & DEVELOPMENT PROPOSALS	4
3.0	PLANNING POLICY CONTEXT	6
4.0	THE PRINCIPLE OF DEVELOPMENT	8
5.0	SITE & SCHEME SUITABILITY	12
6.0	SOCIO-ECONOMIC BENEFITS	19
7.0	SUMMARY & CONCLUSION	20

Appendices

A	PLANNING POLICY	21
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1 INTRODUCTION

- 1.1.1 This Planning Statement has been prepared to support a full planning application on behalf of Reigate & Banstead Borough Council for the construction of a single-storey crematorium with associated landscaping and infrastructure on land to the south of Woodhatch Road, Reigate.
- 1.1.2 The application has been prepared in response to the identified service requirement for a new crematorium facility in the Borough. It also aims to deliver the vision and objectives of both the Core Strategy and the Development Management Plan with regard to social infrastructure, place shaping principles and crematoria provision.
- 1.1.3 The purpose of this report is to provide a supporting statement to the planning application. It considers the appropriateness of the development proposals in terms of relevant planning policies and guidance. It continues to establish why the proposals represent sustainable development under the terms of the NPPF and local policy, before finally drawing an overall conclusion in respect to the acceptability of the development proposals.
- 1.1.4 In addition to this Planning Statement, the standard forms, notices and plans, the application is accompanied by the following key documents;
- Crematorium Needs Assessment;
 - Alternative Sites Assessment;
 - Consultation Statement;
 - Design and Access Statement;
 - Landscape Strategy;
 - Landscape and Visual Assessment;
 - Preliminary Ecological Appraisal and Outline Biodiversity Management Plan;
 - Arboricultural Impact Assessment;
 - Transport Assessment, Stage 1 Road Safety Audit and Designers Response;
 - Energy and Sustainability Report including Preliminary BREEAM Pre-Assessment;
 - Flood Risk Assessment and Drainage Strategy; and
 - Geophysical Survey and Contamination Assessment.
- 1.1.5 The development proposals have evolved through an iterative design exercise that has taken into account the findings and recommendations of these technical and environmental assessments, comments from statutory consultees, and best urban and landscape design practice.

2 THE SITE & DEVELOPMENT PROPOSALS

2.1 DESCRIPTION OF SITE & CONTEXT

- 2.1.1 The application site comprises approximately 4.98ha of land to the south of Reigate, located to the south of Woodhatch Road. The site lies within the Metropolitan Green Belt that surrounds the settlement of Reigate and the majority of urban areas within the Borough as a whole.
- 2.1.2 The existing site context comprises an area of allotments to the north, beyond which is the residential area of Dovers Green along Fellands Close, which forms the southern extents of Reigate town. To the north east is a further area of allotments located along Woodhatch Road. To the east lies Fellands Copse Park, beyond which lies a farmstead with associated outbuildings. Further east lies the A204 Woodhatch Road, the main route into Reigate from the south and the proposed access route to the site. To the south lies open fields and a distinctive area of open woodland (Fellands Copse). Immediately to the west lies a recreational park and an area of scrub land.
- 2.1.3 The application site lies to the west of Earlswood Brook, which run westwards beyond Lonesome Lane to eventually link to the River Mole close to the village of Sidlow.
- 2.1.4 The core area of the site comprises an irregular shaped open field that is defined by strong hedgerows boundaries. The site also incorporates some areas of existing open space and allotments to the north of this field for the purposes of providing an improved access and junction with Woodhatch Road, as described more fully below.
- 2.1.5 The site has not been subject to any planning applications.

2.2 PROPOSALS

- 2.2.1 This application seeks full planning permission for the construction of a single storey, single chapel crematorium building, set within an extensive area of landscape, including formal and informal garden areas, with associated service areas and parking facilities. The total gross external area of the development is 836m².
- 2.2.2 The site will be accessed via a new junction and access road directly from Woodhatch Road. This proposes to effectively upgrade an existing road that runs south west from Woodhatch Road and serves existing allotments and farmsteads located either side of it.
- 2.2.3 In doing so, the new junction is offset further east from the existing entrance to Earlswood Common car park to the north of Woodhatch Road and incorporates a wider route than existing to accommodate two-way vehicle traffic and to provide a pedestrian footway along its length.
- 2.2.4 The main crematorium building comprises an entrance foyer with single chapel that seats up to 120 people. A single crematory is proposed, allowing space for an additional crematory if this was required in future. A waiting area is provided within a linked building at the entrance connected to the main building via the port cochere.
- 2.2.5 The crematorium is surrounded by an extensive landscape area, incorporating formal gardens for quiet contemplation and incorporating memorial features closer to the building, with a more natural landscape towards the site boundary that ties in to the existing woodlands and waterside landscape character. The creation of a sensitive environment has been central to the design of the scheme and is fundamental to the function of service offering for all users.

- 2.2.6 The proposed layout also seeks to ensure that access and circulation for all users is coherent, efficient and attractive. This includes a two-way primary route that provides circular access to the main building with secondary routes that provide access to the service area, the hearse pick-up area and car parking facilities. There is also a distinct footpath network through the site that provides pedestrian access to the main building and garden areas.
- 2.2.7 Parking areas are located at the entrance to the crematorium site, to minimise vehicle movements around the site. Parking provision reflects the needs of the proposed services, with an area of overflow parking to accommodate larger service attendance. Parking areas are interspersed with landscape features to soften their appearance and integrate them with the wider site.
- 2.2.8 The Design and Access Statement that accompanies the application sets out a detailed description of the scheme's layout and detailed design, and demonstrates how the scheme will provide a high-quality development that is both sensitive to its context and will provide a high-quality crematorium experience to its users.

3 PLANNING CONTEXT

3.1 DEVELOPMENT PLAN FRAMEWORK

- 3.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 require that planning applications must accord with the provisions of the adopted Development Plan, unless material considerations indicate otherwise. This Planning Statement, therefore, considers the application proposals in light of the relevant planning policy context and any other relevant material considerations.
- 3.1.2 This requirement is emphasised in the National Planning Policy Framework (NPPF) as updated in February 2019 (Paragraphs 2 and 12). The NPPF is the most recent statement of the Government's planning policy, and paragraphs 2 and 11 confirm that it is itself a material consideration in the determination of planning applications. The NPPF is underpinned by the presumption in favour of sustainable development.
- 3.1.3 The Development Plan for Reigate and Banstead Borough Council (RBBC) comprises of the Reigate and Banstead Local Plan: Core Strategy (adopted July 2014 and reviewed in 2019) (CS), the Reigate and Banstead Local Plan: Development Management Plan (adopted September 2019) (DMP) and the accompanying Policies Map.
- 3.1.4 In June 2019 RBBC completed a review of the Core Strategy in accordance with Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). This concluded that there were no policies that required modifying or updating, and that it remained a robust, up to date, and appropriate strategic policy framework for managing development in the borough.
- 3.1.5 RBBC is not currently preparing any Local Plan documents and the site is not subject to a Neighbourhood Plan.
- 3.1.6 A comprehensive audit of policies within the CS and DMP that are relevant to the consideration of this application has been undertaken. Key policies relating to the proposed use and location within the Green Belt are described in 3.2 below, with a comprehensive summary of these and all other relevant policies and guidance provided in **Appendix 1**.
- 3.1.7 Ministerial Statements and adopted Supplementary Planning Guidance/Documents (SPG/SPD) can also be material considerations and, where relevant are included in Appendix 1. The proposals will also be expected to meet the requirements of the Cremation Act 1902 with regards to the siting of the crematorium (as described more fully in Section 5).

3.2 KEY PLANNING POLICIES

- 3.2.1 The overarching vision of the Core Strategy (CS) states: *"Reigate & Banstead will be one of the most desirable and attractive areas in the region. It will be a place where: people who live in, work in and visit the borough enjoy the benefits of a prosperous economy; neighbourhoods are renewed, improved and supported by effective services and infrastructure and transport options."* (All underscores are author's emphasis only)
- 3.2.2 The CS seeks to deliver this vision through a number of objectives including SO13 (Figure 5), which seeks to secure in appropriate locations adequate land, community services and infrastructure in appropriate locations to support business and community needs.
- 3.2.3 CS Policy CS3: Green Belt of the Core Strategy broadly reflects paragraphs 143-144 of the NPPF and states (paragraph 2) that *"planning permission will not be granted for inappropriate development in the Green Belt unless very special circumstances clearly outweigh the potential harm to the Green Belt"*

- 3.2.4 The visions and objectives of the CS are further reflected in the DMP, which proposes under Policy CEM1 to allocate site(s) for cemetery and/or crematorium provision consistent with sustainability principles. The objectives of this policy support the principle of providing a crematorium within the Borough, subject to specific criteria being met.
- 3.2.5 In particular, the Policy CEM1 states that the Council will support an application for a crematorium where proposals meet the following requirements:
- a) The site should have access from roads, should be located near to transport nodes and should provide sufficient on-site car parking, designed to be visually discrete, to ensure that peak parking demand can be met on the site.
 - b) Proposals providing burial and/or cremation plots, should not be situated within a Groundwater Source Protection Zone 1, within a certain distance from specific water sources as set out in national policy, or in areas where there is known evidence of high-water tables that would affect the depths required for burial and/or cremation plots.
 - c) Where a site is known to be contaminated, or where there is a reasonable possibility of contamination, appropriate investigation, and where necessary mitigation and/or remediation will not be required.
 - d) The proposed development would not have an unacceptable adverse impact on biodiversity, or geological assets.
 - e) The proposal would not have an adverse visual impact on the landscape character of the area.
 - f) The proposal would not have a harmful impact on the amenities of neighbouring occupiers, by reason of noise, pollution, privacy and visual obtrusiveness.
- 3.2.6 The second part of the policy refers to the construction of crematorium proposals within the Green Belt and states: *“Within the Green Belt proposals for change of use to cemeteries or crematoriums will only be supported if very special circumstances are demonstrated, and appropriate facilities are kept to a minimum to limit the impact on the Green Belt...”*
- 3.2.7 The policy goes on to state that justification of very special circumstances should include, as a minimum, the following:
- a) A robust demonstration of need for the facility; and
 - b) Demonstration that there are no alternative suitable sites outside of the Green Belt.
- 3.2.8 The final element of the policy states that *“proposals for crematoriums will be expected to meet the requirements of the Cremation Act 1902 (Section 5), with regards to the siting of the crematorium.”*
- 3.2.9 Policy CEM1 refers to both national and locally regards planning policy. In that light, the proceeding elements of this section of the planning statement will consider the national aspect in the first instance before addressing the local aspects.

4 PRINCIPLE OF DEVELOPMENT

4.1 GREEN BELT

- 4.1.1 The proposed crematorium site lies within the Reigate and Banstead Metropolitan Green Belt that surrounds Reigate.
- 4.1.2 The NPPF attaches great importance to Green Belt areas, as highlighted by paragraph 133 that state that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. In this regard, paragraph 134 goes on to clarify the five purposes that Green Belt serves, notably:
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.1.3 There are no detailed formal appraisals of the Green Belt or landscape character relevant to this specific location or the site specifically, as is confirmed within the submitted Landscape & Visual Assessment (LVA) that supports this application. Furthermore, the most recent Green Belt Review (2017) by RBBC did not consider or assess this location or any areas within the vicinity of the site. However, given its proximity to the built-up edge of Reigate urban area and forming part of the countryside, this area of Green Belt should be considered in relation to its effectiveness in meeting purposes a) and c), in restricting urban sprawl and safeguarding the countryside from encroachment.
- 4.1.4 The impact of the proposed development of the site on the Green Belt in respect of these purposes is, therefore, a key material consideration and is considered in 4.2 below. Reference is also given to the approach taken within the Green Belt Review (2017) in assessing the extent to which this area of Green Belt meets those purposes.
- 4.1.5 Given the protection afforded to Green Belt, inappropriate development within it is, by definition, harmful to it and should not be approved except in ‘*very special circumstances*’ (NPPF paragraph 143). Whilst paragraphs 145 and 146 of the NPPF set out some limited exceptions of development that is considered appropriate within the Green Belt, this does not include the construction of crematoria.
- 4.1.6 This is reinforced by CS Policy CS3 (Green Belt) and DMP Policy CEM1 (Cemetery and Crematorium Provision), which both explicitly require very special circumstances to be demonstrated that clearly outweigh the potential harm to the Green Belt as a result of proposed development. This is considered fully in 4.3 below.

4.2 GREEN BELT PURPOSES

- 4.2.1 Green Belt land within the Borough is within Metropolitan Green Belt, which is designated with the primary purpose of the containment of London. However, it has a localised role under the purposes set out within the NPPF of, in this instance, checking the unrestricted sprawl of large built-up areas and assisting in safeguarding the countryside from encroachment. These are considered in turn below.

Purpose a) Checking the unrestricted sprawl of large built-up areas

- 4.2.2 The Green Belt Review (GBR) in 2017 included Reigate as a main urban settlement and, in that regard, considered it to be a large built-up area. Whilst it notes that the concept of ‘sprawl’ is not defined in the NPPF, it took this to mean “*the uncontained outward spread of a large built-up area at its periphery*” (GBR paragraph 3.13).
- 4.2.3 Whilst the application site does not directly adjoin the settlement edge, the area between the site and settlement edge largely comprises allotments that have a direct physical and visual relationship with the built-up area. Furthermore, there is an area of development at New Pond Farm, to the north east of the site, comprising commercial and residential uses that are adjoined by further allotments. All of these uses are accessed from the Woodhatch Road via a single unnamed lane.
- 4.2.4 To the south east of the application site is Earlswood Brook, beyond which is an extensive woodland (Felland Copse) that separates the site from South Earlswood to the east and aligns the rear of development along Lonesome Lane to the south west.
- 4.2.5 The application site is, therefore, partially contained by the surrounding built development and associated uses, and of moderate importance to Green Belt in this regard. However, there are clear and robust boundaries to the application site that will contain development and prevent sprawl in the long term. In this regard, therefore, the area is considered to be of lower importance to Green Belt and the resultant loss of this area is not considered to be critical to the settlement separation or result in an unacceptable loss in the gap between settlements.

Purpose c) Safeguarding the countryside from encroachment

- 4.2.6 Consideration in relation to safeguarding the countryside from encroachment draws upon similar characteristics noted above in terms of the proximity to existing urban and landscape features, and boundaries that would prevent physical and visual encroachment of the countryside in the long term.
- 4.2.7 In this regard, the application site is largely undeveloped, as it contains the existing access road, parking area and smaller areas of allotments. As noted above, the site has strong boundaries, including prominent landscape features, although these are weaker along western boundary of the site.
- 4.2.8 In this regard, therefore, the area is considered to be of moderate importance to Green Belt.

4.3 VERY SPECIAL CIRCUMSTANCES

- 4.3.1 In accordance with both national and local policy, the proposed development is considered to be inappropriate development and must demonstrate very special circumstances to outweigh the harm, by reason of inappropriateness and any other harm identified, and it must also demonstrate that the proposed development has a limited impact on the Green Belt.
- 4.3.2 In this light and in accordance with both national and local policy, the proposed development must demonstrate ‘very special circumstances’ to outweigh the harm by reason of inappropriateness and any other harm identified, and it must also demonstrate that the proposed development has a limited impact on the Green Belt.

Justification of Need

- 4.3.1 In accordance with the requirements of NPPF paragraph 144, CS Policy CS3, and DMP Policies NHE5 and CEM1, the crematorium proposals are underpinned by a comprehensive Needs Assessment that has been prepared and submitted to support the application.

- 4.3.2 In summary, the Needs Assessment clearly sets out the demonstrable need for a new crematorium facility within Reigate and Banstead Borough, which is justified through a detailed analysis of both the quantitative and qualitative factors affecting the current and future provision of crematoria in the area.
- 4.3.3 Critically, it highlights that residents currently do not have a crematorium within the Borough itself and are, therefore, required to travel outside of the area to access a crematorium. Furthermore, two of the nearest existing crematoria that serve the area (Randall's Park and North East Surrey) are exceeding the quantitative standard for cremation provision, with a third crematorium close to reaching its capacity (Surrey & Sussex).
- 4.3.4 Indeed, evidence from the Office for National Statistics (ONS) indicates a significant and sustained growth in the population and number of deaths within those local authority areas served by these existing crematoria.
- 4.3.5 A key consideration is, however, that given the growth in population and the ageing of the current population in the borough, combined with the general trend in an increase in demand for cremations, over time the situation will significantly worsen if a new facility is not provided. Moreover, the provision of a new crematorium in the area will relieve the pressure on the existing crematoria, which will allow them to provide improved services to the bereaved.
- 4.3.6 It is, therefore, considered that there is a significant need for the provision a crematorium facility within the borough that robustly justifies the very special circumstances for the development to take place within the Green Belt.

Assessment of Alternative Sites

- 4.3.7 A search for sites was carried out by RBBC in coming to a decision to select the Woodhatch Road site for the development of a crematorium and was undertaken in response to feasibility work that identified a need for crematorium services within the borough.
- 4.3.8 In accordance with DMP Policy CEM1, an Alternative Site Assessment has been prepared and submitted to support this planning application that summarises the process of assessing the feasibility of prospective sites for a new crematorium in the borough, setting out the selection process and the relevant suitability of the application site in preference to others considered.
- 4.3.9 In summary, the alternative site assessment process was broken down into three stages; Stage 1: Broad Area Search, Stage 2: Potential Site Identification, and Stage 3: Detailed Site Assessments.
- 4.3.10 Given the context of the borough, particular consideration was given to the potential impact on Green Belt, Areas of Outstanding Natural Beauty (AONB) and Areas of Great Landscape Value (AGLV), as well as the ability of sites to meet the requirements of the Cremation Act 1902.
- 4.3.11 As summarised in full within the Alternative Site Assessment report, this process identified a total of 13 prospective sites within 10 broad areas of search, resulting in two sites being shortlisted for greater detailed consideration.
- 4.3.12 Notably, all 13 sites were located within Green Belt. Given the nature of a crematorium and regulatory requirements, this is not surprising and it is rare for suitable sites for crematoria to be located in urban areas due to the limited land areas available and potential for ground contamination. Indeed, recommendations for the establishment of crematoria by the Federation of Burial and Cremation Authorities (FCBA) emphasises that the suitability of setting is of greater importance than its location in close proximity to population. In that light, this will often involve the consideration of sites within the Green Belt.

4.3.13 The final stage of assessment compared the site-specific constraints of the two identified sites using a traffic light assessment of key considerations, including ecological designation, floodzone, open space, access and landscape setting. Whilst the two sites were closely comparable in terms of scoring within the traffic light assessment, it was considered that the application site was most accessible and best able to meet the recommendations of the FCBA in terms of tranquillity and seclusion. Whilst it would impact on open spaces, it was found that these could largely be addressed in the same location and that the site was sufficient to address any ecological mitigation within the site.

4.4 LIMITED IMPACT ON THE GREEN BELT

4.4.1 The NPPF states (paragraph 144) that *“very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”*

4.4.2 Furthermore, CS Policy CEM1 states that within the Green Belt crematoriums will only be supported where appropriate facilities are kept to a minimum to limit the impact on the Green Belt.

4.4.3 The detailed design process that has been undertaken as part of the new crematorium scheme proposals has carefully considered the potential impact on the surrounding context and has, therefore, incorporated a number of measures to ensure that the development will result in minimal impact on the surrounding landscape.

4.4.4 The layout of development ensures the sensitive siting of the building, locating this within the sloping site topography to reduce its impact and visibility across the wider landscape, whilst also ensuring a high-quality built form and coherent layout that is appropriate for this public facility.

4.4.5 The Design & Access Statement that supports the application also provides an area comparison that demonstrates the size of rooms is appropriate to the services to be provided. Notably the main parking area is reduced in comparison to comparable crematoria developments, with additional overflow parking provided with grasscrete (or similar) surfacing to create a softer visual appearance, whilst allowing flexibility for larger funeral services.

4.4.6 Viewpoints considered within the submitted Landscape and Visual Assessment (LVA) were agreed with RBBC as part of the pre-application consultation process, with these being representative of the key views of the development available across the site.

4.4.7 The LVA confirms that the proposed location for the new crematorium at Woodhatch has been carefully considered both in terms of layout and position, incorporating a suite of primary mitigation measures. Thus, minimising the potential for the perceived harm, the project may cause to the Green Belt and maximise the potential for enhancement opportunities and improvement of the current experience of the site by users of the main site’s public open space

4.5 CONCLUSION

4.5.1 Whilst the proposed development would result in some impact on the openness of the site, in considering the location of the site and its moderate and lower sensitivity in terms of meeting Green Belt purposes, and the demonstration of very special circumstances in accordance with national and local policy and pre-application advice, on balance the development would not cause significant harm to the open character of the site.

5 SITE AND SCHEME SUITABILITY

5.1 OVERVIEW

- 5.1.1 The key policy that relates to the proposed development is DMP Policy CEM1, as set out in Section 3.2 above. That policy sets out a series of criteria that new crematorium must meet in order to be supported by the Council, which reflect the requirements of other policies within the Development Plan.
- 5.1.2 The following section, therefore, sets out how the proposed development accords with Policy CEM1 and other relevant policies contained within the Development Plan.

DMP Policy CEM1 Criteria

- 5.1.3 Policy CEM1 of the DMP states that the Council will support applications for cemeteries and crematoriums where proposals meet the following criteria;
- a) The site should have access from roads, should be located near to transport nodes and should provide sufficient on-site car parking, designed to be visually discrete, to ensure that peak parking demand can be met on the site.
 - b) Proposals providing burial and/or cremation plots, should not be situated within a Groundwater Source Protection Zone 1, within a certain distance from specific water sources as set out in national policy, or in areas where there is known evidence of high-water tables that would affect the depths required for burial and/or cremation plots.
 - c) Where a site is known to be contaminated, or where there is a reasonable possibility of contamination, appropriate investigation, and where necessary mitigation and/or remediation will not be required.
 - d) The proposed development would not have an unacceptable adverse impact on biodiversity, or geological assets.
 - e) The proposal would not have an adverse visual impact on the landscape character of the area.
 - f) The proposal would not have a harmful impact on the amenities of neighbouring occupiers, by reason of noise, pollution, privacy and visual obtrusiveness.
- 5.1.4 The criteria as set out above has formed a key consideration in the preparation of the scheme proposals and it is considered that the new crematorium will be delivered in accordance with these elements for reasons as follows.

5.2 ACCESS

- 5.2.1 It is proposed that the site will be accessed from Woodhatch Road via the existing service road that serves the existing properties and allotment site.
- 5.2.2 The access arrangements will be upgraded to provide a 6m carriage way and a 2m footway along the western side of the carriageway. In addition, the access will be relocated 15m to the east of the current centreline position to ensure a 30m junction spacing distance is maintained between this access and the car park access opposite.

- 5.2.3 A Transport Assessment (TA) has been prepared that assesses the impact of the proposed development on the existing highway network. It has also informed the design of access proposals for the site, as well as setting out the required level of car parking provision and details of sustainable access.
- 5.2.4 The TA recognises that the site is well located to the local and wider surrounding highway network and can also be accessed via the local pedestrian, cycling and public transport network that surround the site.
- 5.2.5 The TA confirms that the level of parking provision is in accordance with the operators need and is shown to be adequate to serve the site and meet peak parking demands.
- 5.2.6 The TA concludes that the proposed development would not have a severe adverse impact on the operation or safety of the surrounding highway network, and therefore, should be considered acceptable in transport terms.
- 5.2.7 Scoping discussions were undertaken with Surrey County Council (SCC) in their role as the Local Highway Authority (LHA) to agree methodologies and assessment parameters. As part of this process the LHA confirmed that they would have no objection to the proposed development, subject to the submission of a satisfactory Transport Assessment that incorporates appropriate mitigation measures.
- 5.2.8 A Stage 1 Road Safety Audit (RSA) was also carried out on the design of the access point for the proposals. This identified 5 potential problems in respect of bus access, risk of close junction spacing, risk of rear shunt incidents, safe access to bus stops and the provision of safe guidance.
- 5.2.9 A Designers Response was prepared in response to the RSA, which sets out how the proposed development will respond to these problems and as such, will not result in a negative impact on highway safety.
- 5.2.10 It is, therefore, considered that the proposals are in accordance with **DMP Policy CEM1**. It is also considered that the proposals accord with the NPPF and **CS Policy TAP1**.

5.3 FLOOD RISK & DRAINAGE (GROUNDWATER SOURCE PROTECTION ZONE 1)

- 5.3.1 A Flood Risk Assessment (FRA) has been prepared in support of the application that has assessed the potential flood risk of the proposed development. It confirms that the majority of the site is located within Flood Zone 1, and is therefore, at low risk of flooding from groundwater, reservoir failure and overland flows.
- 5.3.2 The FRA does highlight that a part of the site is located in Flood Zone 3, and therefore, within an area at high risk of fluvial flooding within an annual probability higher than 1%. However, the proposed development has taken a sequential approach and located the built form outside of Flood Zone 3. It is not, therefore, considered that the proposed development would result in an increase in flood risk to the site or the surrounding area.
- 5.3.3 The FRA also sets out Sustainable Urban Drainage Strategy (SUDS) for the proposed development. This includes the provision of above ground storage systems to attenuate surface water run-off, prior to discharging into the adjacent watercourse. This is due to the ground conditions not being suitable for infiltration. It also recommends the incorporation of rainwater harvesting, rain gardens, swales and bio-retention areas in the final SUDS scheme to further slow the discharge of surface water run-off.
- 5.3.4 Moreover, given the proximity of the site to Earlswood Brook and the small portion site that falls within Flood Zone 3, formal pre-application consultation was undertaken directly with the Environment Agency to consider the finding of the FRA and the proposed SUDS strategy.

- 5.3.5 The response from the EA confirmed that they are satisfied that the proposed development meets the requirements of the sequential test and consider that the proposed drainage scheme is acceptable. Overall, therefore, the EA confirm that they would have no objection to the proposed development.
- 5.3.6 The proposed development does not include the provision of any burial plots, nor is it located within a Groundwater Source Protection Zone 1 area. It is, therefore, considered that the proposals are acceptable in this regard.
- 5.3.7 Overall, the proposed development has an acceptable level of flood risk in terms of the requirements of the NPPF. It is considered that the proposed development accords with the requirements of **DMP Policy CEM1** and **DMP Policy CCF2**.

5.4 CONTAMINATION

- 5.4.1 Ashdown Site Investigation Ltd have undertaken a ground investigation of the site to assist the structural design and to identify any potential contamination issues. The results of this investigation are set out in the Combined Geotechnical and Ground Contamination Risk Assessment (ref: R14437) that was submitted as part of the planning application.
- 5.4.2 The assessment confirms that the site does not lie within an Environment Agency Source Protection Zone with regard to the protection of the quality of groundwater that is abstracted for potable supply.
- 5.4.3 The assessment includes a Preliminary Contamination Risk Assessment that confirms there are no potential sources of contamination within the site itself. The assessment does identify a number of potential off-site sources of contamination. However, the distances to the potential sources are considered to be too distant to feasibly impact the area of development.
- 5.4.4 It is recommended that further ground investigation works are undertaken to prior to the construction of the proposed development, which include the installation of ground gas monitoring standpipes, to be monitored over a suitable period of time. It is considered that if this is deemed necessary a suitable condition could be attached to the decision notice should the application be approved.
- 5.4.5 It is, therefore, considered that the proposed development accords with the requirements of **DMP Policy CEM1** in regards to ground contamination.

5.5 BIODIVERSITY / GEOLOGICAL ASSETS

- 5.5.1 A Preliminary Ecological Appraisal (PEA) has been undertaken to support the application that has assessed the ecological impact of the proposed development on the site and surrounding area.
- 5.5.2 The PEA confirms that there are no statutory conservation sites of international importance within 2km of the site. The site is adjacent to the Earlswood Common LNR, which is a statutory conservation site of local importance. The features of nature conservation interest within this LNR are two large lakes, several smaller ponds, wetland corridors, scattered trees and woodland, and semi-improved grassland which includes the nationally rare plant Chamomile. However, it is not considered that the development of the site would have a negative impact on this nature conservation interest area.
- 5.5.3 The PEA highlights that there are twelve non-statutory designated sites within 2km of the site. However, only two are consider likely to be affected by the development of the site. These include New Ponds Farm / Fellands Copse and Earlswood Common SNCI.

- 5.5.4 The New Ponds Farm / Fellands Copse is designated for its semi-natural woodland and species rich wet grassland habitats, whilst Earlswood Common SNCI has been designated for its 'mosaic of habitats including acid grassland'.
- 5.5.5 The PEA considers that the habitats contained within the site itself are common and widespread and do not have a high ecological value. However, the streams scrub and hedgerows may be used by protected species such as bats, great crested newts and reptiles. It, therefore, recommends that the connectivity between the more ecologically valuable areas of Fellands Copse and Earlswood Common are maintained and where appropriate enhanced.
- 5.5.6 The PEA also sets out a series of ecological enhancement measures, which overall seek to enhance the surrounding ecological value of the area and ensure that the overall ecological impact on the surrounding biodiversity is minimised. These include a range of measures to maintain and enhance the existing hedgerows, wet ditches and streams that are recognised as suitable reptile habitats. It also recommends the provision of additional tree planting to screen the development and encourage wildlife, as well as the creation of a long-term biodiversity management plan to monitor the biodiversity enhancement measures.
- 5.5.7 The PEA concludes that if the ecological enhancement measures are implemented, then it is considered that the biodiversity of the wider site can be enhanced, and therefore, the impact of the sites proposed development can be adequately compensated for.
- 5.5.8 Overall, it is considered that the proposed development would not have an unacceptable adverse impact on any biodiversity or geological assets, and is therefore, it accords with **DMP Policy CEM1** and **DEMP Policy NHE2**.

5.6 LANDSCAPE AND VISUAL

- 5.6.1 The LVA provides a summary of the effects of the development on the identified landscape and visual receptors, along with an appraisal of the time required for the positive effects that the integrated planting proposals included within the scheme will have on any of the Adverse effects identified through this LVA process and the enhancement of the current baseline condition. This confirms the most significant adverse effects relate to the permissive footpaths within the site, which can be reduced through mitigation to result in a slight adverse effect in the long term. It also notes immediate moderate to major beneficial effects to users of the Earlswood Common and cycleway footpath and the residential property at New Pond Farm.

5.7 AMENITY OF NEIGHBOURS

- 5.7.1 The proposed development site was specifically selected in order to ensure that the proposed development would accord with the requirements of the Cremation Act 1902 (Section 5) which state: *"No crematorium shall be constructed nearer to any dwelling-house than two hundred yards, except with the consent, in writing of the owner, lessee and occupier of such house, nor within fifty yards of any public highway, nor in the consecrated part of the burial ground of any burial authority"*
- 5.7.2 The proposed Landscaping Scheme has been carefully considered to ensure that views of the built form are effectively screened within the landscape to limit any visual impact of the development on the surrounding area.
- 5.7.3 Whilst the exact specification of the cremator is yet to be determined, it should be highlighted that the emissions that are produced by the cremator are negligible compared to other everyday human activities. Indeed, a cremator with abatement emits less emissions than that of an average car journey and less mercury than the process of making cement. Moreover, there are a range of statutory controls on emission from a crematorium and it is proposed that the development will seek to achieve a greater standard than statutory compliance through additional means such as double filtration of particulates.

5.7.4 It is considered that the proposals would not have a harmful impact on the amenities of neighbouring occupiers by reason of noise, pollution, privacy and visual obtrusiveness, and therefore, are in accordance with **DMP Policy CEM1**.

5.8 OTHER CONSIDERATIONS

Design and Layout

- 5.8.1 The design and layout of the proposed new crematorium has been carefully considered to ensure the delivery of a high-quality facility that respects the surrounding context.
- 5.8.2 The proposed built form has been situated within the centre of the site to utilise the site's topography and the existing mature woodland, hedges and shaws to ensure that the building is assimilated into the surrounding landscape and to provide an appropriate setting for the facilities use. Indeed, the principal axis of the proposed building runs perpendicular to the slope, which allows the built form to be partially set within the landscape, reducing the visual impact of development from the surrounding landscape.
- 5.8.3 The proposed layout has also been directly influenced by the requirements of the Cremation Act 1902, and therefore, the location of the built form on site has been carefully considered in order to consider the relationship of the built form with neighbouring residential properties.
- 5.8.4 The siting of the built form has also been designed to ensure that it sufficiently located away from the floodplain located to the south east of the site. This will ensure that the proposed development will not result in an increase in flood risk to the site or surrounding area.
- 5.8.5 The layout and orientation of the building has been designed to take into account the practical and operational considerations and to enhance the user experience of the proposed crematorium. It has been designed to allow for a clear sense of procession consisting of approach, arrival, ceremony and departure. The orientation allows exit from the chapel into a sunny south facing flower court with views to the surrounding landscape and proposed Memorial Garden.
- 5.8.6 The layout has also incorporated the provision of parking for both visitors and staff to meet the needs of the crematorium facility. This provision has been split into two separate areas across the site, including a primary car park and an overflow car park, to ensure that the visual impact on the surrounding landscape is reduced.
- 5.8.7 The use of a high-quality palette of materials has been considered to ensure that the building sits comfortably and unobtrusively in the surrounding landscape and reduces the visual impact of the development on the surrounding landscape.
- 5.8.8 The proposals include a comprehensive network of both permissive and new public rights of way, allowing for enhanced public access to the surrounding public open space. That includes the provision of an additional footbridge over the Earlswood Brook and the enhancement of the northern edge of the brook through the provision of new planning and enhanced access to the water's edge as part of a Riverside Walk.
- 5.8.9 Further details of the schemes development and design principles are set out in the DAS (ref: 29798A) that forms part of the planning application submission.
- 5.8.10 It is considered that the proposed development would result in the delivery of a high-quality cremation facility that positively addresses the design policy requirements of the NPPF and **DMP Policy DES1**.

Sustainability

- 5.8.11 The development proposals have evolved with a focus on sustainable design, notably seeking to use less energy, supply energy efficiently and use renewable energy. These matters are considered in more detail in the Energy and Sustainability Report that was submitted as part of the planning application (ref: 20.12.16 Planning Stage Energy and Sustainability Report).
- 5.8.12 A number of techniques have been employed to passively reduce baseline energy consumption and CO₂ emissions. These include measures to ensure that the building incorporates a high-performance thermal envelope and utilises a ventilation strategy to ensure the buildings heating and cooling, energy consumption and CO₂ are kept to a minimum throughout the lifespan of the building.
- 5.8.13 A heat recovery system will be incorporated into the building design to recover heat from the cremation process for space and water heating. It is anticipated that between 60-80% of the development's annual heating requirement will be provided by the waste heat from this process.
- 5.8.14 An appraisal of possible renewable energy sources was undertaken as part of the scheme's evolution. That concluded that the most appropriate form of Renewable Energy Technology that could be incorporated into the scheme would be Solar Photovoltaic (PV) panels. The initial modelling exercise has demonstrated that 10% of the development's energy can be provided by this energy source.
- 5.8.15 The preliminary energy and sustainability modelling of the proposed development demonstrates that the building can be designed and constructed to provide a 40% reduction below Part L 2013 target CO₂ emissions. It is, therefore, considered that the proposed development can attain a BRE AAM 'Very Good' rating.
- 5.8.16 Overall, it is considered that the proposed development will meet the national standards of design and construction, and contribute to ensuring a reduction in carbon emissions. It is, therefore, considered that the proposed development is in accordance with **CS Policy C11** and **CS Policy CCF1**.

5.9 OTHER CREMATORIA PLANNING APPLICATIONS

- 5.9.1 The Site Suitability Assessment that supports this application sets out the approach undertaken to select the site and assess its overall suitability for development. The Needs Assessment further demonstrates the suitability of this location within the borough for the provision of a new crematorium.
- 5.9.2 It is noted that planning permission has recently been refused for two alternative crematoria developments within the neighbouring authority of Tandridge District, notably at Byers Lane, Godstone (ref: 2020/882) and Land off Oxted Road, Oxted (ref: 2020/690). Whilst both sites were located within the Green Belt (as the application site), their rural location and proximity and potential impact on more sensitive landscape areas, including the Area of Outstanding Natural Beauty, were considered to be unacceptable for such a development.

- 5.9.3 A further application for a new crematorium has recently been submitted to Tandridge District Council by Merton College / Mercia (ref: 2020/2007). This is located close to South Croydon, approximately 30 minute drive-time from the application site and. Whilst there is some overlap in the catchment area for the proposed Woodhatch Crematorium, it is considered that the impact would be limited, as it seeks to attract populations in South London. Again, this site is located within Green Belt, but also notes the site's relationship to a number of designated landscape areas, including Site of Nature Conservation Importance, Area of Greater Landscape Value, Ancient Woodlands, and proximity to a Local Nature Reserve
- 5.9.4 That application will need to be considered by Tandridge District Council on its own merits in due course. However, this is not considered to affect the suitability of the Woodhatch Crematorium site and this planning application.

6 SOCIO-ECONOMIC BENEFITS

6.1.1 The proposed development would result in a significant number of social, economic and environmental benefits that are a material consideration in the determination of this application. These are as follows:

Social Benefits

6.1.2 The provision of a new crematorium within Reigate would effectively meet the identified quantitative and qualitative needs of the Borough. It would provide the community with an additional cremation service that will ease current pressures on existing facilities that currently serve the Borough and surrounding areas.

6.1.3 Indeed, as set out in the Needs Assessment that was submitted as part of this application, Reigate does not have its own crematorium, and therefore, local residents are required to travel outside of the area to access cremation services. However, two of the existing crematoria that currently serve the community are already exceeding their quantitative standard. It is clear, therefore, that an additional crematorium would make a significant improvement to experience of bereaved families in the area.

6.1.4 In addition, there would be further benefits to the wider community as a result of the proposed development through the provision of an enhanced public footway network that will increase the connectivity of the area to the surrounding woodland and countryside for recreational use.

Economic Benefits

6.1.5 It is anticipated that the proposed development will directly employ 5 employees once the crematorium is fully operational. The crematorium would also provide additional economic benefits on a short-term basis during the construction process, including local employment, associated training and procurement.

6.1.6 The crematorium would result in increased business to local Funeral Directors and other supporting funeral services, who would benefit from a facility in closer proximity to their existing branches.

6.1.7 In addition, it would also result in increased business for other associated businesses including florists, pubs and restaurants (which provide typical venues for wakes), and hotels (for guest accommodation).

Environmental Benefits

6.1.8 The proposed development will include a series of ecological enhancement measures that will result in a significant number of environmental benefits to the site and surrounding areas. This includes the provision of additional tree and woodland planting and wet and dry wildflower meadows, as well as the maintenance and enhancement of the existing hedgerows, wet ditches and streams.

6.1.9 Moreover, the building will be constructed to BREAAAM standard 'Very Good', which will ensure that it will have a high energy efficiency rating that minimises carbon emissions, and therefore, reduces its overall environmental impact.

7 SUMMARY & CONCLUSION

- 7.1.1 Section 38 of The Planning and Compulsory Purchase Act 2004 requires that planning applications must be determined in accordance with the provisions of the adopted Development Plan, unless material considerations indicate otherwise. As demonstrated above, the application proposals accord with national policy, the policies within the Core Strategy and Development Management Plan for Reigate and Banstead Borough Council. It is therefore considered that the development proposals are acceptable in this location and that full planning permission should be granted.

APPENDIX 1: SUMMARY OF EXTANT PLANNING POLICY AND SUPPLEMENTARY GUIDANCE

Crematoria

CEM1: Cemetery and Crematorium Provision: specifically relates to the provision of crematoriums with the Borough. The policy is set out in full below;

1. The Council will support applications for cemeteries and crematoriums where proposals meet the following criteria:
 - a. The site should have access from roads, should be located near to transport nodes and should provide sufficient on-site car parking, designed to be visually discrete, to ensure that peak parking demand can be met on the site.
 - b. Proposals providing burial and/or cremation plots, should not be situated within a Groundwater Source Protection Zone 1, within a certain distance from specific water sources as set out in national policy, or in areas where there is known evidence of high-water tables that would affect the depths required for burial and/or cremation plots.
 - c. Where a site is known to be contaminated, or where there is a reasonable possibility of contamination, appropriate investigation, and where necessary mitigation and/or remediation will be required.
 - d. The proposed development would not have an unacceptable adverse impact on biodiversity, or geological assets.
 - e. The proposal would not have an adverse visual impact on the landscape character of the area.
 - f. The proposal would not have a harmful impact on the amenities of neighbouring occupiers, by reason of noise, pollution, privacy, and visual obtrusiveness.
2. Within the Green Belt proposals for change of use to cemeteries or crematoriums will only be supported if very special circumstances are demonstrated, and appropriate facilities are kept to a minimum to limit the impact on the Green Belt. Justification of very special circumstances should include as a minimum, the following:
 - a. A robust demonstration of need for the facility; and
 - b. Demonstration that there are no alternative suitable sites outside of the Green Belt.
3. Proposals for crematoriums will be expected to meet the requirements of the Cremation Act 1902 (Section 5), with regards to the siting of the crematorium.

Sustainable Development

NPPF Paragraphs 7-9 emphasise that the purpose of the planning system is to contribute to the achievement of sustainable development, through three interdependent social, economic and environmental objectives.

NPPF Paragraph 11 emphasises that the NPPF is underpinned by a presumption in favour of sustainable development that is central to both plan making and decision taking. It requires plans to seek to meet the development needs of the area and policies should, as a minimum, provide for objectively assessed development needs. It continues that approval should be given to development proposals that accord with an up-to-date development plan without delay, where there are no relevant development plan policies or the policies are out-of-date decision then planning permission should be granted unless '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.'

NPPF Paragraph 38 states that decision makers at every level should seek to approve applications for sustainable development where possible and that local planning authorities should approach decision on proposed development in a positive and creative way.

Core Strategy Policy CS1: Presumption in Favour of Sustainable Development: states that in determining development proposals, the Council will apply the presumption in favour of sustainable development outlined in the NPPF.

Core Strategy Policy CS10: Sustainable Development: sets out a series of requirements to ensure sustainable development this includes reference to the efficient use of land, appropriate densities, contribution to the creation of neighbourhoods, protection and enhancement of the green infrastructure network, ecology, heritage, use of natural resources, minimising pollution, design to adapt to climate change and flood risk mitigation.

Green Belt

NPPF Paragraph 144 sets out that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

Core Strategy Policy CS3: Green Belt states that planning permission will only be granted for development in the Green Belt where very special circumstances clearly outweigh the potential harm to the Green Belt.

DMP Policy NHE5: Development within the Green Belt sets out the requirements for appropriate forms of development within the Green Belt. It has been prepared in line with the above policy (Policy CS3: Green Belt).

Transport and Accessibility

NPPF Paragraph 102 states that transport issues should be considered at the earliest stage of plan making and development proposals to ensure the potential impacts of development on transport can be addressed. The policy also ensures that opportunities to promote walking, cycling and public transport can be identified and pursued, to mitigate and avoid adverse effects on the environment.

NPPF Paragraph 103 adds that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

Core Strategy Policy CS17: Travel Options and Accessibility: sets out the Councils approach to managing and reducing the need to travel.

DMP Policy TAP1: Access, Parking and Servicing: sets out a series of requirements for new developments in regards to access, parking and servicing.

Design

NPPF Paragraph 91 highlights that the planning system has an important role in achieving healthy, inclusive and safe places that promote social interaction, are safe and accessible, and enable and support healthy lifestyles.

NPPF Paragraph 117 states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses.

NPPF Paragraph 124 states 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. **Paragraph 125** states that plans should set out a clear design vision, so that applicants have as much certainty as possible about what is likely to be acceptable.

NPPF Paragraph 127 states that planning policies and decisions should ensure that developments;

- a) 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;
- b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) 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;
- e) 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
- f) 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.

NPPF Paragraphs 128-132 emphasises the importance of design quality through the evolution and assessment of developments proposals. It states that permission should be refused for development of poor design that fails to improve the character and quality of an area and take into account any local design standards or style guides in plans or supplementary documents.

DMP Policy DES1: Design of New Development: states that all new will be expected to be of a high-quality design that makes a positive contribution to the character and appearance of its surroundings. It also sets out a design criteria that new developments must meet to ensure planning approval.

Landscape and Open Space

NPPF Paragraph 170 sets out the approach for planning policies and decisions to contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, recognising the intrinsic character and beauty of the countryside, minimising impacts on and providing net gains for biodiversity and preventing new development from contributing to unacceptable levels of soil, air, water or noise pollution.

CS Policy CS2: Valued Landscape and Natural Environment states that in considering proposals for significant development, the Council and developers will be required to protect and enhance the borough's green fabric.

DMP Policy NHE3: Protecting tress, woodland areas and natural habitats sets out the Councils approach to the protection of trees and woodland areas within the Borough.

Ecology

NPPF Paragraph 175 states that development should be encouraged where it incorporates biodiversity improvements in and around developments, especially where this can secure measurable net gains for biodiversity.

DMP Policy NHE2: Protecting and Enhancing Biodiversity and Areas of Geological Importance

states that development likely to have an adverse effect upon any site designated as a SNCI, RIGS or an LNR will only be granted where:

- A. The need for, and benefits of, the development on the site clearly outweigh the impact on nature and geological conservation features and community value; and
- B. It is demonstrated that adequate mitigation of, or as a last resort, compensation for, the impact of the development will be put in place.

Drainage

NPPF paragraph 155 requires that development is directed away from areas at highest risk of flooding and seeks that development does not increase flood risk elsewhere.

DMP Policy CCF2: Flood Risk states that development must avoid areas at risk of flooding where possible and prioritise development in areas with the lowest risk of flooding.

Pollution

NPPF Paragraph 180 requires decisions to ensure that new development is appropriate for its location taking into account the likely effects of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the wider area to the impacts that could arise from the development.

DMP Policy DES9: Pollution and contaminated land states that development will only be permitted where it can be demonstrated that it will not result in a significant adverse or unacceptable impact on the natural or built environment (including sensitive habitats); amenity; or healthy and safety due to fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air land, water or soil pollution.

Sustainable Buildings

NPPF paragraph 149 states that plans should take a proactive approach to mitigating and adapting to climate change, with **paragraph 150** stating that new development should be planned for to avoid increasing vulnerability to impacts arising from climate change, whilst helping to reduce greenhouse gas emissions.

Core Strategy Policy CS11: Sustainable Construction states that the Council will expect non-residential development to be constructed to a minimum of BREEAM 'very good' (taking into account the overall viability of the proposed development at the time the application is submitted).

Infrastructure

CS Policy INF1: Infrastructure sets out the Councils approach to the provision of infrastructure to support development.

Community Facilities

Policy INF2: Community Facilities states that the provision of new community, sports and recreational facilities will be encouraged provided that there is an identified local need that cannot be met from the use of existing stock, the site would easily and safely accessible to the local community; and the proposed development would have no adverse impact on residential amenity or character of the area.

Planning Obligations & Construction

Core Strategy Policy CS12: Infrastructure delivery sets out the Councils approach to developer contributions.

DMP Policy DES8: Construction management states that the Council will expect all development to be managed in a safe and considerate manner. It states that a Construction Management Statement may be required, where the site is constrained or where it is identified that there is a specific risk to highway safety and/or the amenity of neighbouring properties.