

Ceylan Yildirim Akbas

From: Cllr King
Sent: 18 February 2021 10:44
To: planning applications
Cc: [REDACTED]
Subject: Re: Crematorium planning application - 21/00192/F
Attachments: current provision with borough boundaries.png; banstead to leatherhead.png; tadworth to leatherhead.png

Further to the email below, I realised that the Needs Assessment for this application did not include Figure 6, (current crematorium provision) with an overlay of the borough boundaries. I have included this here as I think it is extremely helpful in identifying whether or not there is a need.

My observations from this image with the overlay is that there is very little of the borough that is currently not within the catchment of existing crematoria. Also that the "green blob", which indicates areas which may only have good service due to motorways is only slightly overlapping with our borough.

I was also a little concerned by the somewhat "freehand" nature of the "green blob", so I wanted to see how it stood up to scrutiny. I have attached two screenshots of google maps, showing areas in Reigate and Banstead that are within the "green blob" indicated, where travel time to the crematorium in Leatherhead is 20 minutes or less without motorways. I believe this would mean a cortege would be able to make the journey in 30 minutes, so this leads me to the conclusion that the area of the "green blob" is over-stated, and does not really represent areas that have a need for a crematorium.

As such, I remain concerned that the needs assessment has not particularly shown a strong need for a crematorium in the area.

James

From: Cllr King
Sent: 07 February 2021 17:49
To: planning applications <planning.applications@reigate-banstead.gov.uk>; Planning <Planning@reigate-banstead.gov.uk>
Cc: [REDACTED]; Cllr King <Cllr.King@reigate-banstead.gov.uk>
Subject: Crematorium planning application - 21/00192/F

Thank you for publishing details of this application on the planning portal.

I have heard from a number of residents, and share some of their concerns about this application.

Firstly, I do not believe the application demonstrates a need for a crematorium in the area - and certainly not one that overcomes the very special circumstances required to build upon the green belt. In particular, the isochrones show a huge overlap in catchment area for this proposal and existing crematoria, not least Surrey and Sussex Crematorium - the catchment area of which includes this proposed site (demonstrating the high degree of overlap). Randall's Park crematorium also has a large overlap to the north of the proposed site. Further, I do not believe the application demonstrates a comprehensive search for the best possible site, being, as it was, restricted in its criteria, as follows: The Alternative Site Assessment states that "An influential factor for this stage of the process was the market availability and affordability of sites within the borough.", **I am unsure if this should be considered a material planning**

consideration, but I do not believe it should - therefore I fear this is an insufficient search for potential sites to demonstrate very special circumstances.

The result of the overlapping catchment areas is that very few residents will stand to gain from the siting of a crematorium at this location, which has not been selected based on a comprehensive search of all possible sites. The applicant asserts that the residents may wish to have more choice of facility or service type, but I believe this simply clouds the planning issue of demonstrating a clear need. They also state that residents may be pleased to find a service offered within the borough, or that there is advantage to the borough council providing this service. I do not believe most people particularly care about the borough of the crematorium they select and I do not believe this should be a planning consideration - nor should the fact that this proposal would be run by local government (the facility could be sold or subcontracted at any time). Furthermore, the assessment of need has not accounted for an increasing trend towards direct cremations, which will reduce the requirement for facilities such as this with public grounds and large parking areas.

I would also like to point out that in the needs assessment, figure 6 and 7 differ: "The areas of interest affected by the inclusion of the motorways in the drivetime analysis are identified in green in Figure 6.". The location of this green area changes between figure 6 and 7. I do not think that correcting for this would lessen the concerns I have; but I do think it's important to clarify. Figure 7 shows more overlap between the "green area" and the proposed Woodhatch catchment area, than there would be if the green area was drawn in the same place as figure 6. That is to say, figure 7 seems to misrepresent the value offered by siting a crematorium at this location, and could be misleading.

At present, I am concerned that no need has been established for a crematorium in this location - our recently implemented DMP is consistent with the view that there is no need - and that the site search was not suitably comprehensive for the purposes of demonstrating a need that pertains to being very special circumstances.

Secondly, **this is green belt land**, some of which is a Site of Nature Conservation Interest, and so quite rightly, **the benchmark required to build on this land is particularly high**. As well as the high barrier to building over green belt, this particular site is also a site that helps connect Earlswood Lakes, through New Pond Farm, Felland Copse, to Lonesome Lane Recreation Ground, and onwards to the green belt land beyond Reigate and Sidlow. The submitted Ecological Assessment Report indicates that **"it is important to maintain connectivity between Fellands Copse and Earlswood Lakes" and this connectivity in particular, as well as wider connectivity described above, is compromised by this proposal**. I am concerned that the crematorium proposal does not offer anywhere near sufficient compensation for the loss of this special habitat land (for many species as highlighted in the council's countryside guide), in our precious green belt.

Thirdly - This is a well used amenity space by local residents for many years and has significant community value - local residents using this site include, on a personal level multiple generations of my own family, from my grandparent's generation, right through to my own children. There are many other local families who have used this land in a similar way for several generations. It is used regularly by dog walkers, who are unable to allow dogs off the lead at the nearby Earlswood Lakes, and this site provides a valuable space for these residents. It is also used by families walking through from Woodhatch and Lonesome Lane towards the lakes. There are also important allotments that will be lost, some of which are specifically in community use by [Gateway Community Allotments](#) (pdf also attached). Two football pitches also offer an important facility for some of the community to engage in exercise and organised team activity. These will also be lost based upon this application.

Many residents are disappointed by this application and the impact it will have, and have represented this to me at the initial consultation stage, and beyond. Despite COVID rules (such as lockdown) being in

effect, significant community groups have formed on social media in opposition to this proposal, because of how much **local residents value this area as both amenity space and for the natural/wildlife environment it provides**. I would also like to draw your attention to the petition about the proposal which garnered over 600 signatures, but was not considered by council due to it being a planning matter. Well - now that we are at the planning stage - [please take those 600+ signatures into account when considering the community value](#) of the land for this planning application. **Residents value their current use of this land, which they have used in this way for many years.**

The site is itself highlighted in a number of the council's own documents as community/wildlife supporting open space, such as:

https://www.reigate-banstead.gov.uk/info/20042/parks_and_countryside/79/parks_and_playgrounds/2

https://www.reigate-banstead.gov.uk/download/downloads/id/279/earlswood_common_leaflet (pdf also attached).

http://www.reigate-banstead.gov.uk/download/downloads/id/284/countryside_guide (pdf also attached).

It is clear that the council believe the site to be of great value both ecologically and as amenity space, and this is reflective of the views of both local residents and [Reigate Area Conservators](#) who have done a lot of work on the area. **Please ensure that the ecological and community amenity value is considered when considering the planning application.**

If there is considered to be a need by the planning department, I would be concerned that it does not outweigh the community and greenbelt value of the land, and does not amount to very special circumstances needed to build on green belt land and a Site of Nature Conservation Interest.

Fourth - traffic has long been a concern on this road; since before the planning proposal residents have been asking for a safe traffic controlled crossing from Woodhatch to Earlswood Common, and onwards to locations such as Reigate School (as borough councillor I have passed these enquiries onto county council without any success). This road is fast, and busy, with hospital traffic (including emergency ambulances) using it regularly. Traffic often backs up onto the roundabout junction with Pendleton Road. A busy crematorium attracting funeral cortege traffic would cause significant issues in terms of volume of traffic and obstruction of emergency vehicles, due to the slow speed and increased volume of traffic.

Finally, there is no air quality assessment included with the application. Many residents have concerns about the impact on air quality, both from the burner that the crematorium would necessitate, and the significant additional slow moving traffic that the crematorium would attract to the area.

The environmental and traffic impact from the proposal could be significant and I do not feel it has yet been proven that this would not have an adverse impact on our residents and our community, including two local schools in the very near vicinity.

Many thanks for your time, I look forward to discussing the application further.

Cllr James King

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📍 12 Fir Tree Rd, Banstead SM7 1NG

📍 Randall's Park Crematorium, Randalls R

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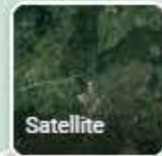
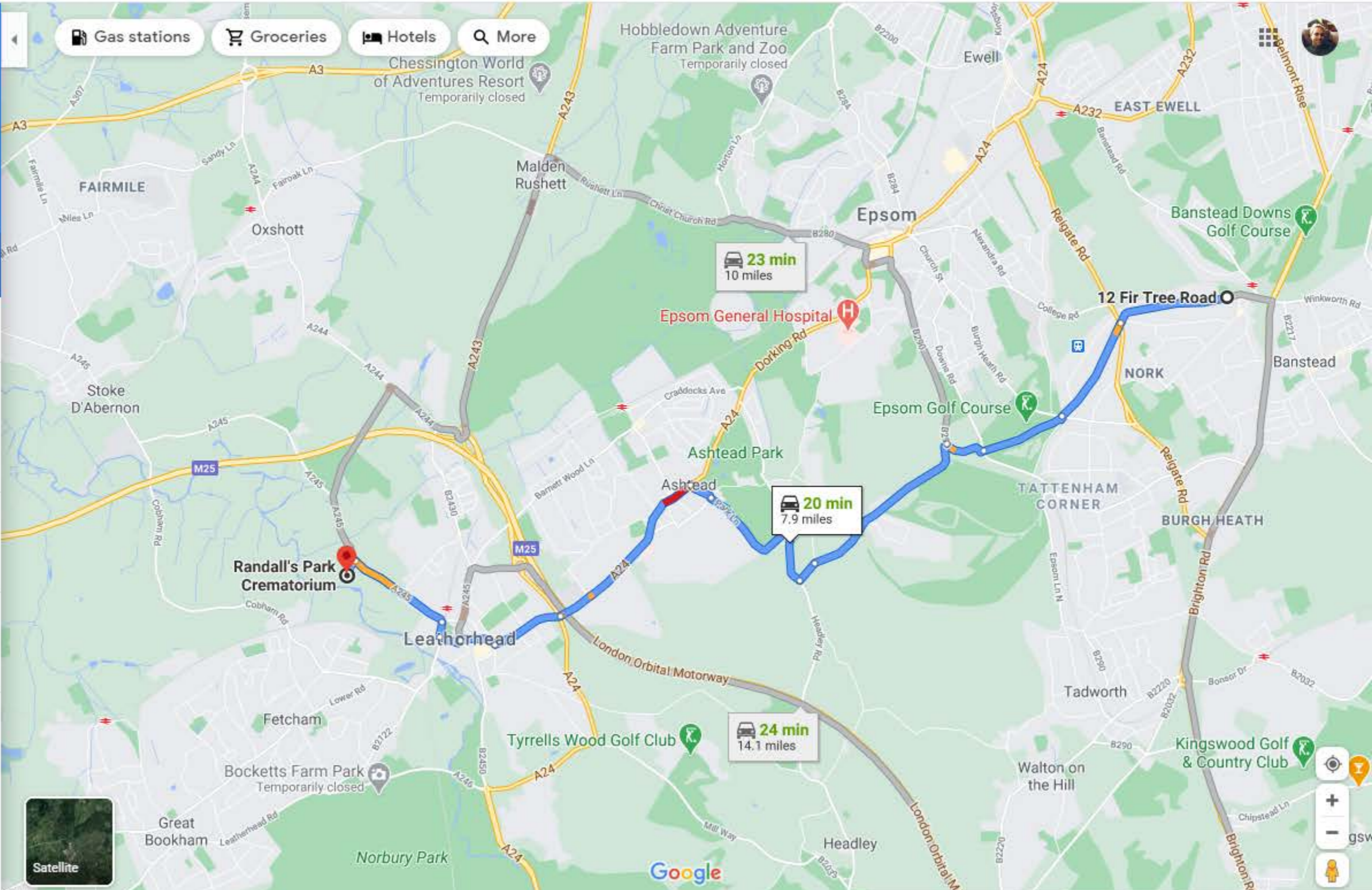
[DETAILS](#)

🚗 via B280 23 min
10.0 miles

🚗 via Brighton Rd/A217 and M25 24 min
14.1 miles

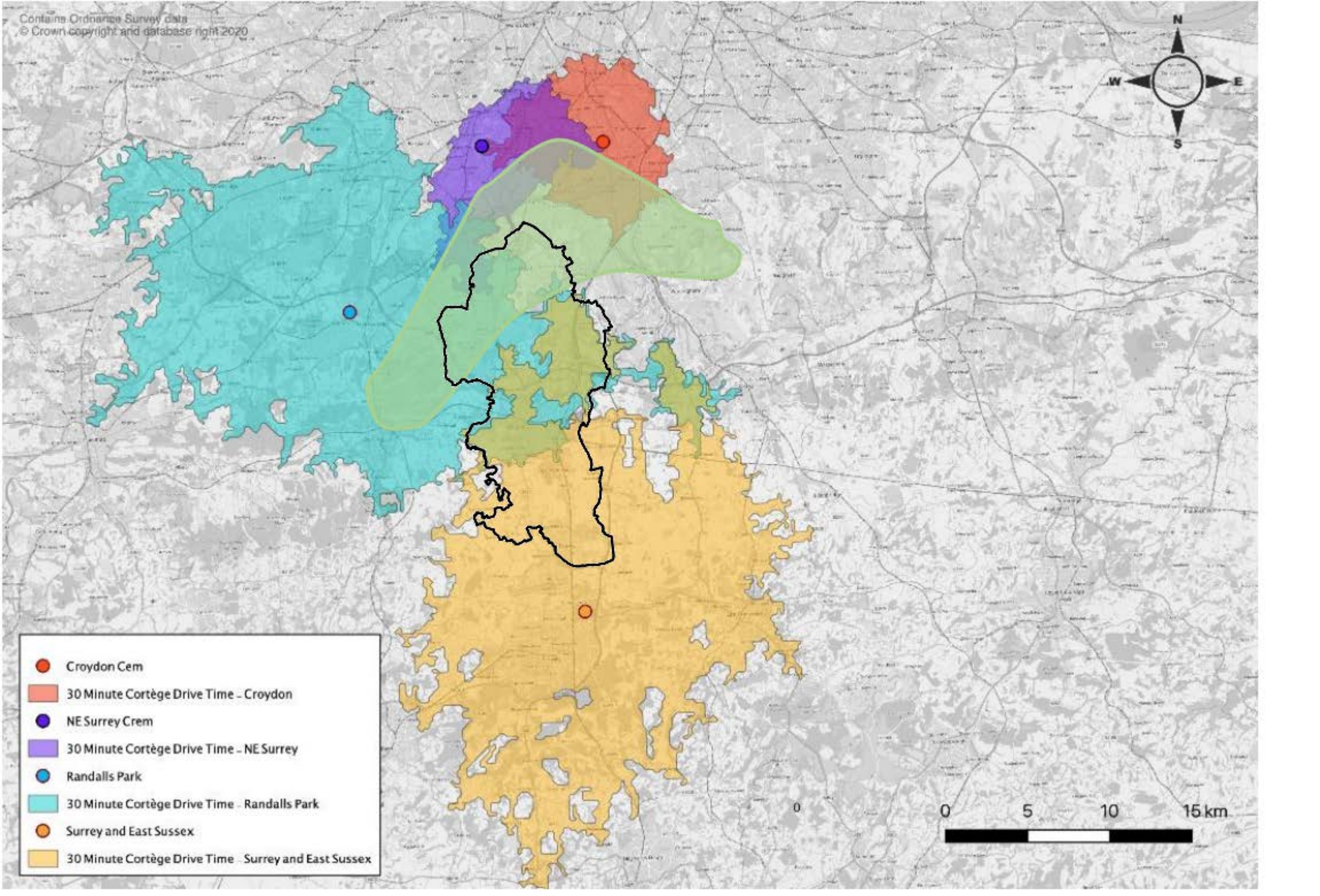
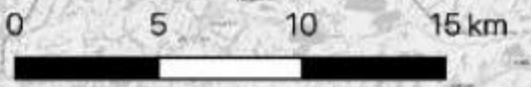
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-  Randalls Park
-  30 Minute Cortège Drive Time - Randalls Park
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-  30 Minute Cortège Drive Time - Surrey and East Sussex



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