

Application: 2020/690

Location: Land off Oxted Road (A25), Oxted

Proposal: Erection of crematorium facility with associated memorial areas, landscaping, parking and infrastructure.

Ward: Oxted North and Tandridge

Decision Level: Delegated

Constraints – GB, A road (Oxted Road), C Roads (Barrow Green Road and Tandridge Hill Lane), Public bridleway 565, Public Footpath 508, TPO within 10m, Water/Minerals site, Ancient Woodland within 500m, Updated Floor Map for Surface Water 1000, HSE notifiable hazard, Biggin Hill and Gatwick Height Zones,

RECOMMENDATION:

REFUSE

Summary

1. The application proposes the change of use of agricultural land within the Green Belt and the erection of buildings to form a crematorium with associated access roads, car parking, memorial gardens and landscaping. The proposed development and land use would amount to inappropriate development in the Green Belt which would also harm openness and result in encroachment of development in the countryside, contrary to one of the five aims of the Green Belt designation. To justify development, the applicant must demonstrate very special circumstances which would overcome the harm by reason of inappropriateness and any other harm identified. In this case, the proposal would also lead to harm to the character of the site and surroundings, views of the Area of Outstanding Natural Beauty and landscape. No other objections are raised but it remains for the applicant to demonstrate very special circumstances which would clearly outweigh the substantial harm associated to the Green Belt matters and the harm to the protected and non-protected landscape character of the area.
2. It is important to highlight that inappropriate development, which causes harm by encroachment into the countryside, is out of character and clearly impacts openness by virtue of the cumulative impact of the use of the land, buildings, hardscaping, car parking and associated paraphernalia, cannot be mitigated by the introduction of planting that seeks to hide development that is inappropriate. A management plan is not considered to be an appropriate means to address this significant harm in the short or long term.
3. The applicant has sought to justify the proposal on the basis of significant need for crematorium facilities in the local area, citing long journey and wait times and poor qualitative experience. The onus is upon the applicant to demonstrate very special circumstances, and it is considered that the need is not clearly demonstrated having regard to existing and permitted schemes within the local area. As such, it does not amount to very special circumstances to outweigh the substantial harm to the Green Belt and the harm to the AONB and landscape. Refusal is therefore recommended.

Site Description

4. The site comprises an open field situated to the north side of Oxted Road (the A25) which extend from Tandridge Hill Lane to the west to Barrow Green Road to the East. The north boundary runs parallel and adjacent to public bridleway 565 and public footpath 508, to the north of which is the Oxted Sandpits site. The field, which is currently used as grazing land for horses, is enclosed by timber post and rail fencing with mature vegetation to the road facing west, south and east boundaries. Whilst it is currently

visually open to the bridleway to the north, there are trees to the other side of the public right of way.

5. The site, situated within the Green Belt, slopes downwards from southwest to northeast and from southeast to northwest, and there is a natural dip located relatively centrally within the plot. The surrounding area is rural in character with limited forms of development in the vicinity.
6. The site is within the Parish of Tandridge near its boundary with Oxted and is to the south of the Surrey Hills Area of Outstanding Natural Beauty. It is also within the designated minerals safeguarding area.

Relevant History

7. No relevant history.

Key Issues

8. The site is in the Green Belt and a key consideration is whether the proposal would constitute inappropriate development in the Green Belt. If inappropriate, it must be demonstrated that a case for very special circumstances exists to clearly outweigh the harm by reason of inappropriateness and any other harm identified.
9. In addition to the Green Belt considerations, there must be consideration of the impact of the proposal upon the character of the surrounding area, including the Area of Outstanding Natural Beauty (AONB) to the north, the amenities of neighbouring residential dwelling, highway safety, the environment and community needs.

Proposal

10. The application seeks permission for the change of use of the land from agricultural to a proposed crematorium. The development comprises the erection of a crematorium facility made up of two link-detached single-storey, timber-clad buildings. The south building would provide a welcome/reception area for attendees, and the north building would comprise the chapel/ceremonial hall and administration/utility facilities, including the cremator. The buildings would be linked via a long brick wall and a canopy structure which would serve to cover the walkway between the two buildings and as the porte-cochere. The facility has been designed to allow for attendance of up to 120 people for each service.
11. Access arrangements include the formation of a vehicular access from Barrow Green Road, which is sufficiently wide to allow vehicles entering and existing the site to pass. This would lead to an internal access route leading to the service area/staff car parking, the porte-cochere leading into the hall and car parking for attendees (120 spaces). A pedestrian walkway would be formed leading from Oxted Road into the site.
12. Memorial gardens would be formed to the northeast of the site and the land to the west of the crematorium facility would be planted as meadows. The landscaping scheme incorporates significant tree planting to the side boundaries.
13. Minor alterations to the scheme were submitted after registration of the original application drawings. This includes revised information regarding access/highways, drainage information, ecology (dormouse population) and design. This report considers the proposal as amended.

Development Plan Policy

Local Development Plan

- Tandridge District Core Strategy 2008 – Policies CSP1, CSP11, CS12, CSP15, CSP18, CSP20, CSP21, CSP22

- Tandridge Local Plan: Part 2 – Detailed Policies 2014 – Policies DP1, DP5, DP7, DP10, DP13, DP18, DP19, DP21, DP22
- Woldingham Neighbourhood Plan 2016 – Not applicable
- Limpsfield Neighbourhood Plan 2019 – Not applicable
- Caterham, Chaldon and Whyteleafe Neighbourhood Plan – submission version (Regulation 16) (2019) – Not applicable

Emerging Tandridge Local Plan 2033

- Policies TLP01, TLP02, TLP03, TLP18, TLP20, TLP32, TLP35, TLP37, TLP40, TLP44, TLP45, TLP46, TLP47, TLP48, TLP49 and TLP50
14. The Tandridge District Core Strategy and Detailed Local Plan Policies predate the NPPF as published in 2019. However, paragraph 213 of the NPPF (Annex 1) sets out that existing policies should not be considered out-of-date simply because they were adopted prior to the publication of the Framework document. Instead, due weight should be given to them in accordance to the degree of consistency with the current Framework.
 15. Paragraph 48 of the NPPF sets out that Local Planning Authorities may give weight to relevant policies in emerging plans according to
 - a. The stage of preparation of the emerging plan (the more advanced the preparation, the greater the weight which may be given);
 - b. the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
 - c. the degree of consistency of the relevant policies in the emerging plan to the NPPF (the closer the policies, the greater the weight that may be given).
 16. The emerging Local Plan 2033 was submitted for examination in October 2019, and hearings have concluded. Whilst the plan is at an advanced stage, the Examining Inspector has not published his initial report due to considerations related to the lack of funding for proposed improvements to Junction 6 and the implications this may have on the proposed housing supply. Discussions are ongoing. As policies may need to be amended after which they must be the subject of further consultation before adoption, very little, if any, weight may be attributed to these policies. The evidence base, however, may be referenced as the most up to date information.

Supplementary Planning Documents (SPDs), Supplementary Planning Guidance (SPGs) and non-statutory guidance

- Tandridge Parking Standards SPD (2012)
- Tandridge Trees and Soft Landscaping SPD (2017)
- Surrey Hills AONB – Building Design into the Surrey Hills
- Surrey Hills AONB Management Plan 2020-2025
- Surrey Design Guide (2002)

National Advice

- National Planning Policy Framework (NPPF) (2019)
- Planning Practice Guidance (PPG)
- National Design Guide (2019)
- Siting and Planning of Crematoria (Department of Environment, 1978)

Statutory Consultation Responses

County Highway Authority

17. The County Highway Authority has undertaken an assessment in terms of the likely net additional traffic generation, access arrangements and parking provision. On the basis of a desktop assessment, the County Highways Officer has stated that she is satisfied that the proposed development would not have a material impact on the safety and operation of the adjoining public highway subject to the imposition of appropriate conditions.

Tandridge Parish Council

18. The Parish Council does not support the proposal which would generate dangerous traffic on the A25. It notes that the site is within the AONB and would affect the Green Belt.

Oxted Parish Council

19. The Parish Council is not generally against the proposal but is concerned about its location in the Green Belt and Area of Outstanding Natural Beauty. Councillors have concerns related to flooding, pollution, increase in traffic and issues regarding access to and from the site. It welcomes a request from the County Council regarding the additional surveys.

Crawley Borough Council

20. No objection.

London Borough of Croydon

21. No objection

Reigate and Banstead Council

22. Objection. The proposal would lead to added pressure upon already congested roads near Reigate.

Sevenoaks District Council

23. No objection.

Environment Agency

24. No objection subject to condition requiring the submission and approval of a remediation strategy by the Council.

Health and Safety Executive (HSE)

25. None received.

Lead Local Flood Authority (Surrey County Council)

26. No objection subject to conditions following provision of updated information.

Natural England

27. No objection.

Non-statutory Advice Received

Surrey AONB Planning Adviser

28. Objection in relation to views into the Area of Outstanding Natural Beauty.

Surrey Wildlife Trust

29. The ecology report addresses most issues but does not provide sufficient detail in relation to the potential impact upon dormouse populations in the local area.

Supplementary information has been assessed and it is considered that additional information may be required by condition to address these.

TDC advice

Council Environmental Health Officer

30. No objection. Condition to require compliance with specification as set out in Table 3.1 of the Air Quality Assessment should be imposed.

Other Representations

Third Party Comments

31. Comments against the proposal:

- The proposal is inappropriate development in the Green Belt which would also reduce openness and represent urban sprawl.
- The Local Plan proposes significant reduction of Green Belt and this should not be eroded further.
- The proposal would lead to loss of landscape quality in an area near the Surrey Hills AONB and be harmful to the rural character of the area. This cannot be adequately screened from the surrounding area, and where trees are proposed would obscure views across to the AONB. It would also be very visible from the bridleway.
- Due to its location, the approach to Oxted would be harmed.
- The application suggests a second cremator may be accommodated as five cremations per weekday would not be viable. This would result in further harm.
- The buildings are out of character with the surrounding area.
- The proposal would lead to increased traffic and harm to highway safety, particularly for horse riders and cyclists, due to slow moving funeral traffic generated and the level of HGVs already travelling on Barrow Green Road for the nearby quarry. The information regarding attendance figures are low compared to that experienced in local funerals at churches.
- The proposal would cause harm to users of the public footpath and bridleway. Reference is made to an accident on Tandridge Hill Lane.
- No need is substantiated, in particular for Tandridge residents. Existing facilities are sufficient.
- The catchment extends beyond Tandridge District, but the Green Belt assessment does not.
- Insufficient information about sewage handling.
- The population of Tandridge District is just over half the threshold of 150,000 assumed for a new crematorium.
- The proposal provides little employment.
- The site is ecologically sensitive, and no assessments have been carried out in relation to environmental impact.
- The search for sites is inadequate. Alternative brownfield sites should be explored. An alternative site off Byers Lane would be more suitable as it's brownfield land.
- Pre-application consultation exercise was too brief.
- Drawings are unclear or not readily visible online. Topographical information is incomplete.
- The energy requirement for the proposal is considerable, equivalent to a 500-mile car journey, releasing 400 kilos of carbon dioxide. There is limited carbon offset opportunity.
- Proposal would result in pollution and fumes. It is unclear whether the air survey is for one or two cremators.
- The application provides an unrealistic picture of attendance (too low) which would bring into question viability.

- No pedestrian access from A25 to Barrow Green Road.
- Concern over timing of the application which has been submitted during lockdown due to Covid-19.
- The decision should be made after the Inspector's Report regarding the emerging Local Plan is received to understand full impact.
- Local transport availability is unlikely to be relevant as most will travel to facility by private car.
- Rejection of HIF funding for Junction 6 improvements will affect this proposal.
- The Council are determined to 'dump' development to the west of the District without evaluation of other more logical sites.
- The site is too small to accommodate the activities.
- The site is prone to surface water flooding, in particular at the position of the proposed buildings. There may also be methane in adjacent former landfill site.
- The crematorium and its associated gardens and outdoor areas are within 200 yards of the nearest residential property. This does not comply with the Cremation Act 1902.

32. Comments in support of the proposal –

- There is need for a local crematorium which would reduce travel time for bereaved and benefit to the local community.
- The site is accessible by sustainable methods of transport whilst other local facilities are not.
- Buildings are in keeping with surroundings and will enhance environmental aspects.
- A modern crematorium will be more efficient than existing establishments.
- Traffic could be accommodated given the scale of the facilities. Significant traffic would not travel along Barrow Green Road to the facility.
- Barrow Green Road could be widened.
- People supporting the application would be more affected than those objecting due to proximity of site to their properties.
- The proposal includes plenty of parking which is important.
- Oxted needs investment and the custom from the construction will be advantageous to Tandridge residents.
- Pollution concerns are overstated and not based on fact. An industry magazine cites that one cremation would generate the same NOx emissions as one diesel car driving 2,280 miles. The shorter journeys would likely have a net positive impact in emissions.
- There are no appropriate brownfield sites and the land is currently only used for grazing of horses.
- A poll of Godstone Village Association membership suggests 30% oppose the proposal whilst 70% are strongly in favour.

Assessment

Procedural notes

33. The proposal has been screened in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the Regulations). Having regard to the Regulations and the Planning Practice Guidance with associated annex, it was concluded that the proposal would not constitute development for which a full environmental impact assessment or environmental statement would be required.
34. There are no specific Development Plan policies relating to the provision of crematorium facilities. The application must be considered against the test in S.38(6) of the Planning and Compulsory Purchase Act 2004, namely in accordance with the development plan unless material considerations indicate otherwise.

Cremation Act 1902

35. The proposed development is subject to other legislative and regulatory controls. Of particular note is the Cremation Act 1902, which defines crematoria and restricts the siting of crematoria. A crematorium is defined in Section 2 as
'any building fitted with appliances for the purpose of burning human remains, and shall include everything incidental or ancillary thereto'.
36. In relation to position, Section 5 the Cremation Act 1902 sets out the legal restrictions pertaining to the siting of crematoria. It states that
'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.'
37. Third party representations have contended that the development would not meet the siting restrictions. These comments state that whilst the buildings may meet the 200-yard distance requirement relative to neighbouring residential properties, the ancillary elements (car parking, gardens etc.) would not. Restrictions upon development arising from non-planning legislation are not normally a material consideration. In this instance, however, restrictions which could jeopardise the deliverability of the development would be material insofar as it would undermine the case for very special circumstances. This case, assessed later in this report, argues that the proposed development would satisfy a pressing social/community need. The inability to deliver the development would undermine therefore the case of very special circumstances.
38. However, it is not considered that the proposed development would be clearly prohibited by other non-planning legislation. The distance restrictions set out in Section 5 are not determinative in that it clearly states that a crematorium may be constructed within 200 yards (182.3m) of a neighbouring residential property with the consent of the owner and/or occupiers of the dwelling.
39. Furthermore, it is important to note that the Cremation Act 1902 does not define the terms 'incidental' or 'ancillary.' The legislation predates the Town and Country Planning Act 1947, which established the planning system, and it is far from clear that the definition/legal use of these terms within the planning system would be applicable to that of the earlier Act. There is little case law to address this specific point.
40. It is useful to note the Department of Environment publication 'The Siting and Planning of Crematoria' dating from 1978. This clarified that a crematorium would include buildings and parts of grounds used for the disposal of ashes but not 'ornamental gardens, carriageways or houses for staff.' This would seem to exclude parking areas, access routes and memorial gardens.
41. On the basis of the above, this report considers that the proposal would meet the restrictions set out in relevant, non-planning legislation and assesses the proposal as a deliverable site.

Green Belt

42. The NPPF supports the protection of Green Belts and the restriction of development within these designated areas. Paragraph 133 of the NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, the essential characteristics of the Green Belt being its openness and permanence.
43. Policy DP10 of the Local Plan reflects paragraphs 143-44 of the NPPF in setting out that inappropriate development in the Green Belt is, by definition, harmful and that substantial weight must be attributed to this harm. Permission should only be granted

where very special circumstances can be demonstrated to outweigh the harm by reason of inappropriateness and any other harm identified.

44. Certain forms of development may be appropriate, and these are identified in paragraphs 145 and 146 of the NPPF and broadly reflected in Policy DP13 of the Local Plan. However, the construction of a building and associated development do not meet any of the exception criteria within these national and local planning policies. The proposal would thus be inappropriate development in the Green Belt.
45. In addition to harm by reason of inappropriateness, the spatial and visual impact on the Green Belt must be considered. The proposal would introduce significant built form and development, as well as intensified use, into an undeveloped parcel of land. The permanence of these forms of development and use would result in loss of openness in spatial and visual aspects. Moreover, it would not accord with one of the five aims of the Green Belt, namely the protection against encroachment of development within the countryside.
46. The development is therefore harmful by reason of inappropriateness, harmful to the openness of the Green Belt and contrary to the purposes of the Green Belt. To justify permission, it must be demonstrated that very special circumstances exist which would clearly outweigh these harms, and any other harm, which may be identified with respect to other planning policy considerations as assessed in the next sections.

Location

47. Policy CSP1 of the Core Strategy seeks to promote sustainable patterns of travel and make best use of previously developed land by directing development towards the built-up areas of the District (Category 1 settlements). These are areas of the District where there is a choice of mode of transport available and where the distance to travel to services is minimised. Although the Core Strategy predates the NPPF, Policy CSP1 is consistent with the need to promote sustainable transport, which is a key tenet to the definition of sustainable development as set out in the NPPF.
48. The site is located to the west of Oxted, a Category 1/Tier 1 settlement and within an area of countryside. Strictly speaking, this would be contrary to the provisions of Policy CSP1. However, given the restrictions upon the siting of crematoria, this form of development is highly likely to require a location outside settlement boundaries and result in some degree of reliance upon the private car. Taking into account the predicted relatively low trip generation and the accessibility of the site by existing public transport services (set out in the Highways assessment of this report), it is considered that proposal would not amount to an unsustainable form of development.

Design and character

49. Policy CSP18 of the Core Strategy requires that new development should be of a high standard of design that must reflect and respect the character, setting and local context, including those features that contribute to local distinctiveness. Development must also have regard to the topography of the site, important trees or groups of trees and other important features that need to be retained.
50. Policy DP7 of the Local Plan Part 2: Detailed Policies requires development to, inter alia, respect and contribute to the distinctive character, appearance and amenity of the area in which it is located, have a complementary building design and not result in overdevelopment or unacceptable intensification by reason of scale, form, bulk, height, spacing, density and design. Policy DP12 sets out that all forms of infilling must be in character with the village.
51. The site is currently very open, and it is possible to view across the site from the surrounding roads and bridleway. The proposed crematorium facility would be made up of two buildings linked by way of a porte-cochere/covered walkway. The buildings would

be of timber construction and single-storey form with a mix of pitched and flat roofed forms.

52. In addition to the buildings, the proposal would include ancillary forms of development to the eastern half of the site comprising the addition of access road, car parking (with associated paraphernalia including car charging points) and landscaped gardens. The inclusion of such areas is appropriate insofar as these facilities would be necessary and appropriate to a crematorium facility, as is referenced 'The Siting and Planning of Crematoria' guidance.
53. Cumulatively, the proposal would alter considerably the character of the site from its existing undeveloped appearance. Notwithstanding the fact that there are other forms of built development in the surrounding area (notably the Knights Garden Centre to the west), the loss of the field to development would result in some harm to the overall landscape character of the area. In isolation, the field may not be of great visual landscape value owing to its current use and boundary treatments. However, its openness and undeveloped appearance contributes to the wider rural landscape of this locality, which forms a buffer between existing settlements and softens the visual impact of major roads to the south and north. The absence of development contributes to the open aspect and countryside appearance in this area.
54. The proposal seeks to mitigate this harm by way of the proposed landscaping scheme, including the formation of meadowlands to the west and tree planting to the boundaries. However, the significant amount of screening proposed to soften the visual impact of the development highlights the sheer scale of the development that would not integrate with the rural characteristics of the site and surroundings, and cannot be relied upon ad infinitum as it would alter the landscape character and result in harm to the openness of Green Belt. Whilst in some contexts the building design may be appropriate, it is not considered that the proposal would reflect or respect the character of the site and would result in significant harm which is contrary to Policy DP7 of the TLP Part 2: Detailed Policies and Policy CSP18 of the Tandridge Core Strategy (2008).

Landscape character and Area of Outstanding Natural Beauty (AONB)

55. Paragraphs 170-171 of the NPPF set out the planning policies and decisions should seek to contribute to and enhance the natural and local environment. Paragraph 172 sets out that great weight should be given to specific protected areas, such as AONBs, where the highest protection should be afforded.
56. Locally, Policy CSP21 of the Tandridge District Core Strategy 2008 advises that the character and distinctiveness of the District's landscapes and countryside will be protected for their own sake and that new development will be required to conserve and enhance landscape character. Policy CSP20 of the Core Strategy relates specifically to the AONB. Subparagraph b) sets out the principle that development should 'conserve and enhance important viewpoints, protect the setting and safeguard views out of and into the AONB'. Similar protections would apply to the Area of Great Landscape Value (AGLV).
57. The Tandridge Trees and Soft landscaping SPD (2017) outlines the importance of landscaping which applies to urban and rural areas and advises that it is '*essential that the design of the spaces around building is given the same level of consideration from the outset as the design of building themselves*'. Trees are not only a landscape environmental benefit but, as the SPD outlines, a health benefit for people which enhances their environment.
58. The site is approximately 900m to the south of the Surrey Hills AONB and the AGLV, both to the north of the M25. Due to the topography (steep rises of land levels to the north of the site towards the North Downs), distance and existing landscape features/buildings and the scale of the development, the site is not readily visible or

discerned from the protected landscape areas. The proposal would not result in harm to the long distance views from the site in accordance with Policy CSP20.

59. However, the proposal would alter views of the AONB from the south. The County AONB Planning Adviser has noted the importance of the openness of this site with respect to views of the AONB from the A25. Its present openness allows for views across the site towards the North Downs which are otherwise not available to the east and west of the site due to woodlands and other visual impediments. The tree planting would, remove a relatively rare viewing point into the AONB from this southerly position. Although other views remain, this would result in some harm to enjoyment of this protected landscape contrary to the provisions of Policy CSP20.
60. It is noted that the Surrey Hills AONB is the subject of a boundary review. The associated Land Character Assessment and Evaluation has identified the land directly to the south of the site as a candidate area for inclusion into the AONB. This ridge is currently detached from the AONB, and the County AONB Planning Adviser notes that it is possible that the land between the candidate area and the AONB could be included within the AONB. Whilst recent reports set out that the review of the boundary is likely to commence in the near future, the outcome of the review is not certain. As such, the impact of the proposal upon the land to the south is not considered with respect to the provisions of Policy CSP20.

Neighbour Amenity

61. Policy CSP18 of the Core Strategy requires that development must not significantly harm the amenities of the occupiers of neighbouring properties by reason of overlooking, overshadowing, visual intrusion, noise, traffic and any adverse effect.
62. Criteria 6 – 9 (inclusive) of Policy DP7 of the Local Plan Part 2: Detailed Policies seeks to safeguard amenities of neighbouring properties, including minimum distances that will be sought between existing and proposed buildings. Policy DP7 also requires that the proposed development provide satisfactory living conditions for future occupants.
63. As noted, the site is situated in open countryside with limited development in the vicinity but there are residential dwellings to the west at Tandridge Hill Lane and to the east at Barrow Green Road. The crematorium buildings would be a 183m from these residential dwellings. In addition, the landscaping proposal would include additional trees and vegetative screening around the developed section of the site. The proposal would not have a detrimental effect upon the outlook, light or privacy of these residential properties.
64. The hours of operation are limited to daytime hours and as such, the proposal would not result in undue disturbance arising from visitors to the site. This could be ensured by way of appropriate conditions.
65. The development could give rise to potential air pollution arising from vehicular traffic and the installation of the cremator. These are addressed separately in the relevant sections, but it is considered that this would not result in detrimental harm to the amenities of neighbouring residents subject to conditions.
66. It is concluded on the basis of the above that the proposal would not result in detrimental harm to the amenities of neighbouring residential properties. The proposal would accord with policies in this regard.

Highways Safety

67. Policy CSP12 of the Core Strategy advises that new development proposals should have regard to adopted highway design standards and vehicle/other parking standards. Criterion 3 of Policy DP7 of the Local Plan also requires new development to have regard to adopted parking standards and Policy DP5 seeks to ensure that development does not impact highway safety.

68. The application includes the submission of a Transport Assessment prepared by Systra and supplementary information in response to queries raised by the County Highway Authority. The County Highway Authority has reviewed the information submitted (original and supplementary) and raised no objection to the scheme. It recommends the imposition of various conditions. The various matters are addressed as follows:

Access and safety

69. The proposal includes the formation of a new access from Barrow Green Road to the east. The vehicular access is sufficiently wide to allow two vehicles to pass (enter and exit), and the County Highways Officer considers the visibility splays to be adequate in each direction to allow safe movement into and out of the site. The swept path analysis also indicates that the interior access routes would allow safe movement of vehicles, including refuse lorries, to enter and exit the site in forward gear.
70. The proposal would therefore allow for safe vehicular movement in and out of the site subject to the imposition of recommended conditions in the event of permission.

Traffic generation

71. Compared to the existing agricultural land use with grazing of horses, the proposal would result in an increase of vehicular movements to and from the site by private motor vehicles by staff and visitors/users of the crematorium. It is most likely that attendees will travel by private vehicle although other transport methods may be available.
72. The facility is capable of accommodating 120 attendees. This accords with current industry standards and is supported in the Government conclusions following a review of crematoria facilities¹. Nonetheless, the average attendance of a cremation service is 20-40 attendees based upon information from the applicant's other sites and information from other facilities. This is in line with the Government's figure of 30 attendees in the aforementioned review document.
73. The County Highways Officer notes that there is no survey data available for trip generation associated with crematoria on the TRICS database. Trip generation has been calculated on the basis of 40 attendees for each service travelling two to a vehicle. As such, the proposal would lead to 20 two-way trips per average service. Junction modelling undertaken by the applicant sets out adequate capacity even in the event that two full-capacity services (120 attendees each) take place back-to-back.
74. Although services would operate between 9am to 5pm, it is generally accepted that peak operating hours/slots for crematoria services are in fact between 10am-4pm. This allows attendees and funeral corteges to avoid peak public highway travel hours. Notwithstanding the average attendance figures, large services would lead to additional pressure on the highway network if taking place during peak traffic hours. This would lead to added pressure along the A25, particularly leading to the A22 and Junction 6 of the M25. To address this issue, the CHO has recommended a condition to restrict the size of services between 9-10 and 4-5pm. This would be required by way of a condition requiring a Management Plan to be submitted to and approved by the Council prior to implementation. This should include provisions that only smaller services are allowed within these slots, and the proper recording of these arrangements.
75. Vehicle trip distribution (the direction from which mourners would likely travel to the facility) will vary. The CHO considers that it is unlikely that vehicles would approach via Barrow Green Road and 90% of vehicles are likely to approach from the A25 (Oxted Road). The capacity assessment of the A25/Barrow Green roundabout suggests that there would be little change in the operation of the roundabout even in the worst case scenario (two back-to-back services at full capacity).

¹ Crematoria Provision and Facilities – Government Response to the Review (MHCLG) – 8 April 2019

76. Concerns have been expressed regarding the potential impact of the volume of HGV traffic along Barrow Green Road and the A25, in particular relating to the operation of Oxted Quarry directly north of the site and the slower speeds of funeral corteges. In addition, there is a planning permission for the infilling of Oxted Sandpit, near to the site, which allows for a daily limit of 110 HGV movements. With regard to the Oxted Quarry, the recent planning appeal has allowed for up to 200 HGV movements per day, increased from the figure of 112 allowed by Surrey County Council. The CHO comments takes into account data regarding incidents in the vicinity and existing and permitted traffic, and on the basis of the advice received, it is not considered that the potential impact would be unacceptable for this reason.

Parking

77. The proposal includes car parking provision for staff and service attendees which is sufficient for the requirements of the site. Cycle parking and electric charging points would also be provided. This provision is considered sufficient for the requirements of the site on the whole. As such, the proposal would accord with the requirements of local plan policy.

Accessibility

78. The site is located outside designated settlement areas. Due to the nature of the development, it is considered unlikely that attendees or visitors would walk or cycle to the site.
79. Nonetheless, the site is accessible by bus with stops to either side of Oxted Road just south of the site. The 410 bus route operates a reasonable level of service during weekdays with reduced service at weekends. As such, there is a reasonable option should public transport be required.
80. The pedestrian access route would be added but the proposed pedestrian island along the A25 is not recommended, and it is preferred that this be omitted from the scheme as the existing crossing point at the junction would be a safer option.

Rights of way

81. Turning to the rights of way, concerns have been expressed regarding the potential impact of the development upon users of the adjoining right of way, specifically as it relates to the bridleway and horse riders. The bridleway is a useful connection between existing routes within the local equestrian network.
82. The County Rights of Way Officer has raised no objection but asked for a condition or arrangement of a new bridleway within the site running parallel to Barrow Green Road, thereby allowing horse riders to ride away from Barrow Green Road. However, this is not considered suitable as it raises significant highways safety concerns pertaining to the junctions between equestrian and vehicular movements which would be created where this new bridleway would enter/exit near the junction of Barrow Green Road and the A25 and at the entrance to the crematorium.
83. Moreover, it is not considered that the level of traffic generated would be of such significant harm to raise concern.

Environment

84. As noted, Paragraph 170 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment and includes a number of criteria related to the following areas.

Biodiversity and ecology

85. Policy CSP17 of the Core Strategy requires development proposals to protect biodiversity and provide for the maintenance, enhancement, restoration and, if possible,

expansion of biodiversity, by aiming to restore or create suitable semi-natural habitats and ecological networks to sustain wildlife in accordance with the aims of the Surrey Biodiversity Action Plan.

86. Policy DP19 of the Local Plan Part 2: Detailed Policies advises that planning permission for development directly or indirectly affecting protected or Priority species will only be permitted where it can be demonstrated that the species involved will not be harmed or appropriate mitigation measures can be put in place.
87. The site is currently used as grazing land for horses and provides a limited environment in biodiversity terms. The landscaping scheme would however provide additional landscape areas including new meadowlands and features which, with careful consideration, would enhance the overall biodiversity of the site.
88. The report submitted with the application sets out the Phase 1 survey of the site and details the existing conditions and the potential impact of the proposal on local biodiversity and ecology. A number of recommendations are also included for enhancements and mitigation which have been incorporated in the scheme and would be required by condition.
89. Surrey Wildlife Trust (SWT) has raised no objection in general to the report but raised concerns about the potential impact upon the dormouse population. Whilst the nearest identified population was over 1km from the site, the site hedges may yet serve as a corridor for movement of the species. Supplementary information has been submitted and considered by SWT. It is considered that these matters could be addressed sufficiently by way of conditions requiring the submission of additional reports and proposals for mitigation measures. On this basis, no objection is raised.

Ground contamination and conditions

90. A Stage 1 Geoenvironmental report has been submitted. This identifies no significant potential historical or current contamination of the land. The report has been considered by the Environment Agency which did not object to the scheme subject to conditions. The proposal is thus considered acceptable in relation to ground condition and contamination.

Flooding and drainage

91. Paragraph 100 of the NPPF advises that; 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'.
92. Policy DP21 of the Tandridge District Local Plan Part 2: Detailed Policies 2014 advises that proposals should seek to secure opportunities to reduce both the cause and impact of flooding. Development proposals within Flood Risk Zones 2 and 3 or on sites will only be permitted where, inter alia, the sequential test and, where appropriate, exception tests of the NPPF have been applied and passed and that it is demonstrated through a Flood Risk Assessment (FRA) that the proposal would, where practicable, reduce flood risk both to and from the development or at least be risk neutral.
93. The site is located within the Environment Agency classification as Flood Zone 1 (low probability). This signifies a less than 1 in 1,000 annual probability of river or surface water flooding and is suitable for development and various land uses. The principle of development of this land, therefore, is accepted.
94. The introduction of built form and hard surfacing and the change in land use must be accompanied by surface water drainage and sustainable drainage systems (SuDS) as set out in Policy CSP15 of the Core Strategy. The Stage 1 Geoenvironmental report

identifies the low risk of flooding but notes potential water monitoring considerations with respect to the site itself and those connected to the Oxted Sandpits to the north.

95. The drainage and landscaping strategies will assist in the overall drainage of the site and ensure surface water run-off may be adequately controlled. The Environment Agency and Surrey County Council (in its capacity as the Lead Local Flood Authority) have not objected to the proposal subject to appropriate conditions.
96. The proposed development is thus considered to accord with planning policies in relation to flood risk and drainage matters.

Air Quality

97. Paragraph 170 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by preventing new development from contributing to unacceptable levels of air pollution. At a local level, Policy DP22 sets out that development will not be permitted where it would have an adverse impact upon health, the natural or built environment or amenities by virtue of odour, dust and other forms of air pollution.
98. The proposal would include the installation of a cremator and associated plant. Whilst the emissions from this would be subject to other legislation regarding air pollution and regulating crematoria, the development would result in the potential for airborne emissions of dust/particles.
99. The Council's Environmental Health Officer has considered the application details and raised no objection to the proposal. It is considered that the proposal would be acceptable subject to the appropriate conditions.

Minerals

100. Paragraph 205 of the NPPF sets out that 'great weight should be given to the benefits of mineral extraction, including to the economy' and that landbanks should be maintained outside of specified protected areas. The site is within an area designated as a minerals safeguarding area, specifically sand. The proposed development is of permanent character and would therefore restrict its availability for minerals extraction if permitted.
101. Surrey County Council was consulted as the Minerals Planning Authority and has raised no objection to the proposal. It did, however, draw attention to ground monitoring facilities associated with the Oxted Sandpits operation to the north. These have been noted and accommodated in the development proposal and addressed in the appropriate sections regarding ground water within this report. As such, no objection is raised in relation to the loss of the site for purposes associated to minerals safeguarding considerations.

Loss of agricultural land

102. Agricultural Land Classification provides framework for identifying the physical and chemical characteristics of land in relation to its usefulness for agricultural purposes. Grade 1 is excellent quality whilst Grade 5 is of very poor quality. Approximately half of all agricultural land in England and Wales is classified as Grade 3. This grade includes sub-classifications (3a and 3b). Paragraph 112 of the NPPF states that where significant development of agricultural land is demonstrated to be necessary, the Council should seek to use areas of poorer quality land in preference to that of higher quality. There are no local development plan policies which would be relevant to this issue.
103. In this case, the land appears to be Grade 3 agricultural land, and there is insufficient information to conclude whether this would fall under Grade 3a, for which more specialist protections may be afforded under national planning policies and guidance.

104. The loss of this land, however, is not considered significant in the context of its current use and situation. The land has a long-standing use as grazing for horses, and there is little agricultural activity taking place within surrounding fields. The size of the site and its position adjacent to a major A road are features which are not conducive to its potential future use for agricultural purposes. As such, no objection is raised in relation to the potential loss of agricultural land which would be of limited conflict with the provisions of the NPPF.

Other matters

105. Third parties have commented that the application has been submitted during the unprecedented lockdown. Whilst this has undoubtedly affected and altered the working practices of the Council, it continues to deliver upon its responsibilities as a Local Planning Authority and in accordance with the Government's direction to ensure that this service is maintained notwithstanding any issues arising from the current health crisis. Moreover, the Council has been able to discharge its responsibility to consult the community and relevant statutory authorities on this application, including the posting of site notices and letters as required.

106. The development is CIL liable. Contributions would benefit the local economy and infrastructure.

Very special circumstances

107. The provision of and need for crematoria services and facilities is not specifically identified in national and adopted local planning policies. However, paragraph 92 of the NPPF sets out the overarching requirement that planning policies and decisions should 'provide the social, recreational and cultural facilities and services the community needs'. Policies CSP11 and CSP13 of the Core Strategy reflect this in stating that the Council will seek to ensure sufficient community and leisure services/infrastructure.

108. The applicant has submitted a Need Assessment (hereafter the 'Assessment') and an Addendum to the Need Case document (the 'Addendum') seeking to demonstrate a community need for a crematorium. That such a need may constitute very special circumstances has been established in numerous appeals and case law, particularly where no suitable alternative sites may exist outside of the Green Belt. The Assessment and Addendum set out that the applicant's view that the development is necessary to address significant need for crematoria facilities within the locality and that residents of the District and wider local area struggle with long travel times and insufficient capacity (quantitative considerations) leading to long waiting times and poor qualitative experience in terms of service times and costs.

Travel time

109. There are no crematoria situated within Tandridge District. Existing facilities in the wider area are situated at:

- a. Croydon Crematorium (operated by London Borough of Croydon)
- b. Beckenham Crematorium (privately operated)
- c. Kent and Sussex Crematorium in Tunbridge Wells (operated by Tunbridge Wells Borough Council)
- d. Surrey and Sussex Crematorium in Crawley (privately operated)
- e. Randalls Park Crematorium in Leatherhead (privately operated).

110. The Assessment sets out that 'a funeral cortege should not have to travel more than 30 minutes from the address of the deceased.' The resulting catchment area is calculated on the basis of two-thirds the speed of normal traffic. This 30-minute time is not an industry standard or requirement and is based upon survey evidence suggesting that

the majority of people would favour a journey time of up to 30 minutes. The submitted Assessment sets out the catchment areas of the existing local facilities and shows that much of the southern portion of the District would be situated within a 30-minute drive of Surrey and Sussex Crematorium.

111. Tandridge District is a relatively rural one with small settlements set within large areas of Green Belt. This is particularly true of the central and southern areas of the District. Within this context, it is reasonable to expect journey times of up to 45-minutes to be acceptable, thereby the catchment area associated with the facility is beyond that illustrated.
112. Nevertheless, this assessment will be largely focussed upon the shorter journey time. On this basis, the northern portion of the District is shown to be outside this 30-minute travel catchment area for existing facilities. This section is the most densely populated within the District.
113. The submitted Assessment and Addendum conclude that there is sufficient population within the 'constrained' 30-minute catchment area of the proposed facility to support the crematorium and ensure its viability. Whilst it may take some services from existing facilities, it concludes that this would not harm their viability given that these facilities struggle to meet existing demand. The Assessment concludes therefore that proposed development would reduce the travel time to a key portion of the District and that of residents of adjoining authorities which currently experience accessibility issues based upon travel time.
114. **Error! Reference source not found.** However, it is clear from the above that the catchment areas of crematoria are not limited by local authority boundaries. As such, there are two potential developments within Sevenoaks District which must be considered as part of this assessment. First, there is an application for the erection of an extension to an existing chapel to allow the provision of cremation facilities at Bluebell Cemetery in Sevenoaks District. This is the subject of a non-determination appeal (APP/G2245/W/19/3243177). The hearing for this appeal is pending and as such, very little weight can be attributed to this proposal.
115. In contrast, planning permission was granted at appeal and upheld by the courts for a crematorium in Sevenoaks District at Oak Tree Farm, London Road, Badgers Mount. The permitted scheme incorporated the erection of a cremation building which included a chapel to seat 100 attendees. The site has been acquired by an established developer/operator of cremation facilities, Dignity, which has set out in public representations its intention to implement that permission. A Lawful Development Certificate was granted on 14 July 2020 to confirm that the permission remains extant and may be implemented (SDC/20/01256/LDCPR).
116. The Statement of Need submitted in support of the Oak Tree Farm application shows its 30-minute catchment area which extends westward to include Oxted town. The wider catchment extends to the east of Warlingham and Caterham. Even taking into account the more constrained catchment area, this would cover a significant portion of the catchment identified for this application site. As such, it suggests a far greater overlap than would be suggested in the illustration of the 'unique' catchment areas illustrated in the Assessment.
117. The permitted scheme at Oak Tree Farm would provide reduced travel times for some of the more densely populated areas of Tandridge District to be covered by the proposed development. This would leave a smaller area of Tandridge District and Reigate and Banstead Borough outside the 30-minute catchment areas of existing and new facilities. It is unclear as to whether this population would generate a need sufficiently great to justify the harm to the Green Belt and AONB particularly as it is unclear as to what geographical areas or LSOAs have been included in the population figures detailed in

the Addendum and how these may vary from the catchments shown in application documents for the two different sites.

Existing capacity/need

118. In addition to travel time considerations, the Assessment prepared by the applicant sets out that existing facilities are unable to satisfy local need (quantitative considerations). The Assessment details 'practical capacity' (the number of cremation days multiplied by core hour slots) and the 'quantitative standard' (an annualised figure based upon 80% of the practical capacity figure). It sets out that the quantitative standard is the more effective measurement as it is impossible for crematoria to fill each slot. This method is reasonably supported in appeal decisions.
119. Qualitative considerations include the length of the service and the wait times for a service during peak months. The FCBA recommends service lengths of 45 minutes as best practice. In fact, service duration varies from 30-45 minutes intervals at existing facilities in the locality. The Assessment states that this points to reduced quality of service to meet excess demand. The provision of additional facilities could enable the existing sites to allow greater choice and longer service times and thus a better qualitative experience, although this cannot be guaranteed.
120. Paragraph 7.4 of the Need Assessment sets out that Kent and Sussex, Surrey and Sussex and Randalls Park Crematoria are operating over their quantitative standard. Of these, Surrey and Sussex Crematorium is the nearest of the three facilities to Tandridge District and the catchment of which extends furthest into the District. This facility is operating within the practical capacity (3054 actual vs 3780 practical capacity) and is only marginally over the desirable quantitative standard (3054 actual vs 3024 desired). Based upon figures from the Cremation Society which publishes annual statistics, the actual number of cremations carried out in the facilities has remained relatively consistent, and this is based on service length of 45 minutes. As this is nearer to the District than the other two sites, it is unclear to what extent demand from Tandridge District would be contributing to the excess demand at Kent and Sussex and Randalls Crematoria.
121. Although the Assessment refers to facilities to the north, it is largely silent on the issues of capacity at Croydon and Beckenham Crematoria. Statistics from the Cremation Society suggest that these facilities are operating below practical capacity and possibly below the quantitative standard². As these sites are nearer to the more densely populated portions of District in the north, it is unclear to what extent the capacity of these facilities has been factored into the needs assessment of the District.
122. The Addendum accepts that the Croydon Crematorium is the nearest facility relative to Caterham. The 41-minute drive time is marginally above the 30-minute catchment set out in the Assessment. However, it sets out that Croydon should be excluded from consideration as it would appear to be an unpopular choice based upon death notices published by local funeral directors, showing that a clear majority of cremation services are directed to Surrey and Sussex Crematorium. This is far from conclusive evidence. The number of notices cited in the Addendum is low relative to the number of deaths recorded in the District for this period. Moreover, the text sets out that the death notices relate to those published for the District. It is unclear, therefore, from the analysis alone (as set out in the table on page 3 of the Addendum) as to how many of these arise from areas within the District which would be outside the catchment of Surrey and Sussex Crematorium.

² Cremation Statistics 2019 – The Cremation Society

123. Furthermore, there is insufficient consideration of new and permitted facilities within the wider local area. In relation to new facilities, Wealden Crematorium in Sussex opened in 2019. The Addendum sets out that this facility should be excluded from the consideration of need as it is an hour's drive from much of Tandridge District. However, this neglects to consider the impact of this new facility upon existing facilities. As noted in paragraph 120, Surrey and Sussex Crematorium is operating at just 1% over the much lower but desirable quantitative standard. Given the overlap of catchment area between Wealden and Surrey and Sussex and Kent and Sussex Crematoria, it is reasonable to surmise that it will reduce some of the demand upon these facilities. Neither the Assessment nor the Addendum adequately addresses this consideration.
124. Permitted schemes include not only the Oak Tree Farm site referenced in the travel times section of this report but also permissions at the former Mabledon Hospital in Darenth due to commence in 2020 (in Dartford Borough) and a permitted site in Gravesend (20130923). As proximity is only one factor in the demand for particular facilities, it is unclear as to what impact this overall increase in capacity within the wider area would affect demand at existing facilities and thereby free up existing facilities particularly to the north and east part of the District. In view of the relatively low margin above which the existing facilities fail to meet the higher quantitative standard and the cumulative practical capacity of the facilities, it is considered that there is insufficient evidence to demonstrate significant need in this regard.
125. Third party comments pertaining to a new application for a crematorium in Turners Hill in Sussex are noted. However, as permission has not been granted, the contribution this would have on local needs cannot be given weight in this instance.

Alternative sites

126. As noted, the construction of crematoria is restricted somewhat by the minimum distances from neighbouring residential dwellings and highways as set out in the Cremation Act 1902. Whilst it may be possible to erect a crematorium within 200 yards with the consent of nearby residents, the restrictions mean that urban sites are unlikely to meet these criteria, and it is understandable that this would favour locations in more rural areas. Given the high proportion of Tandridge District which is classified as Green Belt, this therefore leads to the identification of sites within the Green Belt.
127. Within this context, development should be allowed only in very special circumstances. Best practice would suggest that site identification should accord with a sequential approach and consideration. The application includes a Site Selection Report which sets out that the application site is the preferred option. This report does not consider, however, the Farleigh Road site mentioned by third parties.

Economic contribution

128. The receipt of CIL contributions would also be of benefit. In addition, whilst the crematorium is operated privately, the services provided would be of community benefit. Moreover, the development would generate economic benefits directly (employment) and indirectly (associated businesses – florists, funeral directors etc.). This is in accordance with the economic objectives of Policy CSP22 of the Core Strategy and national planning policy in support of sustainable development.
129. The application notes that the costs for cremation in this local area are amongst the highest in the country. However, it is not uncommon for services of many types to be more expensive in the South East of England. Whilst additional facilities may give rise to competition and the lowering of fees, there is no guarantee or condition by which the costs for provision within this private facility to be regulated or controlled by the planning regime.

Conclusion / Planning balance

130. In conclusion, the proposal would lead to harm to the Green Belt and to views of the AONB contrary to local and national policies. In the case of the Green Belt harm, significant weight is attributed to this harm and the development may only be permitted where the harm to the Green Belt and any other harm are clearly outweighed by very special circumstances. The application sets out a case for very special circumstances based on need and improved qualitative experience for residents.
131. Due to the restrictions set out in the Cremation Act 1902, crematoria developments are likely to require sites within countryside and rural areas. As Tandridge District is approximately 94% Green Belt, this leads to potential site identification within the Green Belt contrary to planning policies. This circumstance does not, however, override the special protections to this designated area. It is useful to note that the Government concluded a consultation exercise in 2019 – Crematoria Provision and Facilities. In the Government Response to the Review published on 8 April 2019, paragraph 25 sets out that local authorities are best placed to consider such development based upon the need of the local area and the facts and circumstances of individual applications. Whilst paragraph 23 notes the challenges in developing crematoria due to the requirements of the 1902 Act, paragraph 24 states that the ‘Government has no plans to reduce the protections in national planning policy for the Green Belt’ or other protections for the countryside and designated land. This is a clear indication of the importance of these designations even where there may be some element of community and social needs.
132. The addition of new facilities would increase choice to local residents and the increased competition could result in a reduction in the costs of such services to residents, although this could not be guaranteed or controlled by way of the planning regime. There may also be a contribution to the local economy. However, it is not considered that the application has demonstrated that the need is so significant (having regard to existing, new and permitted facilities within the wider local area) that it would outweigh the significant harm to the Green Belt, character, landscape and the harm to the AONB.
133. The recommendation is made in light of the National Planning Policy Framework (NPPF) and the Government’s Planning Practice Guidance (PPG). It is considered that in respect of the assessment of this application significant weight has been given to policies within the Council’s Core Strategy 2008 and the Tandridge Local Plan: Part 2 – Detailed Policies 2014 in accordance with paragraph 213 of the NPPF. Due regard as a material consideration has been given to the NPPF and PPG in reaching this recommendation.
134. All other material considerations, including third party comments, have been considered but none are considered sufficient to change the recommendation.

RECOMMENDATION:

REFUSE

1. The proposal would constitute inappropriate development in the Green Belt causing significant harm to the openness of the Green Belt and an encroachment of development into the countryside contrary to the purposes of the Green Belt designation. No very special circumstances exist to clearly outweigh the harm by reasons of inappropriateness and other identified harm. As such the proposal is contrary to the NPPF (2019) and Policies DP10 and DP13 of the Tandridge District Local Plan - Part 2: Detailed Policies (2014).
2. The proposal, by reason of the scale of the development and cumulative impact of the change of use of the land, buildings, hard landscaping would fail to respect or reflect the character of the site and its surroundings, contrary to Policy CSP18 of the

Tandridge District Core Strategy (2008) and Policy DP7 of the Tandridge District Local Plan: Part 2 – Detailed Policies (2014).

3. The proposal by reason of its location, character and landscaping would result in significant harm to landscape and views into the Surrey Hills Area of Outstanding Natural Beauty contrary to Policy CSP20 of the Tandridge District Core Strategy (2008) and the NPPF (2019).

This decision relates to

- drawings numbered 1904-LAA-DR-A-E0001 P02; 1904-LAA-XX-XX-DR-A-01401 P01, 1904-LAA-XX-XX-DR-A-01402 P01 received on 3 April 2020, and
- drawings numbered 1904-LAA-DR-A-01020 P05, 1904-LAA-DR-A-01050P02, 1904-LAA-DR-A-01300-P02, 1904-LAA-DR-A-01450 P02, 1904-LAA-DR-A-01451 P02, 1904-LAA-DR-A-01200 P03, 1904-LAA-DR-A-01201 P02, 1904-LAA-DR-A-01210 P03, 1904-LAA-DR-A-01211 P02, 1904-LAA-DR-A-01101 P05, 1904-LAA-DR-A-01102 P04 received on 28 July 2020.

	Signed	Date
Case Officer	AS	22/09/20
Checked ENF		
Final Check	LWess	02.10.2020