

Chelsham & Farleigh Parish Council

The minutes of the virtual meeting over Zoom of the Parish Council of Chelsham & Farleigh held on Monday 4th January 2021 at 7:30pm

Attendees: Cllr Jan Moore - Chairman
Cllr Peter Cairns
Cllr Lesley Brown
Cllr Barbara Lincoln
Cllr Neil Chambers
Cllr Jeremy Pursehouse (Parish & District Councillor)
Cllr Celia Caulcott (District Councillor)
Cllr Becky Rush (County Councillor)

Mrs Maureen Gibbins - Parish Clerk & RFO

MINUTES

1. Apologies for absence

Cllr Nancy Marsh and District Cllr Simon Morrow

2. Declaration of Disclosable Pecuniary Interest by Councillors of personal pecuniary interests in matters on the agenda, the nature of any interests, and whether the member regards the interest to be prejudicial under the terms of the new Code of Conduct. Anyone with prejudicial interest must, unless an exception applies, or a dispensation has been issued, withdraw from the meeting.

There was no specific declaration of interest although all the Councillors have an interest in the area due to living in the Parish

3. A period of fifteen minutes (including County and District Councillors reports) are available for the public to express a view or ask a question on relevant matters on the following agenda.

10 members of the public were in attendance of which 8 were observing the meeting and 1 spoke regarding the high speed fibre broadband and another the issues regarding the bridleway at Holt Wood.

County Cllr Becky Rush - had a site meeting with residents prior to Christmas in relation to the highways issues regarding the crematorium. Cllr Rush is meeting with Highways Officers on 8th January raise the concerns and issues highlighted by residents at the pre Christmas meeting. Cllr Rush stressed that Highways can only object to issues which are within their powers to control. Irrespective of the views of the Highways Authority the local planning office does not need to heed the advice.

VAS - Cllr Rush has spoken to SCC Officers and earmarked a VAS for Chelsham & Farleigh for the price of 2 batteries @ £55 per battery and a charger . The VAS is for the use of the Parish Council for as long as they wish. Cllr Rush is having a site meeting with the VAS Officers on 12th January to review locations and assess if posts are available. This site meeting can be combined with Warlingham Parish Council.

Your Fund Surrey - Cllr Rush is happy to work with the Parish to assist in identifying projects.

Holt Wood - there is currently no update from Cllr Rush.

Night Flight Consultation - the deadline for comments is 3rd March 2021 and Cllr Rush will share her comments with the Parish Council.

Emergency Plan - Woldingham Parish Council is using the template from Tatsfield Parish Council which Cllr Rush will share with Chelsham and Farleigh Parish Council.

Action: Cllr Rush

District Cllr Jeremy Pursehouse - highlighted, following the comment by Cllr Rush, that although the local Planning Authority can go against the advice of the Highways Authority it is very rare. Cllr Pursehouse also requested a copy of the Tatsfield emergency plan.

Local Plan - unfortunately the Planning Inspector has concerns regarding the emerging Local Plan. A number of issues have been raised which are being studied by the TDC Planning Officers ready for a Planning Policy meeting at the end of January. The current plan can be repaired or started again.

A Holt Wood resident thanked Cllr Pursehouse for the letter from Charlotte Parker - Chief Planning Officer at TDC regarding the issues that have been raised at Holt Wood. The resident additionally enquired regarding the bridleway which Cllr Simon Morrow was looking into. It was confirmed by Cllr Rush that the bridleway is on private land and is not, therefore, a SCC matter and is only gets involved if walkers and horse riders cannot use the bridleway due to the condition of the land. The removal of the kissing gate is not a SCC issue. District Cllr Celia Caulcott thanked Cllr Rush for the clarification.

The resident attending the meeting regarding high speed fibre broadband requested clarification of a couple of points which was provided. The Clerk will contact residents who have expressed an interest in the proposal regarding passing on of email details. **Action: CLERK**

A leaflet for delivery to all residents in Chelsham and Farleigh will be printed and delivered by the resident with help from councillors.

4. **To approve the minutes of the council meetings held on 7th December 2020.** The minutes of the meeting held on 7th December 2020 were approved as an accurate account and will be signed by the Chairman.
5. **High Speed Fibre** - It was agreed the Parish Council supports this proposal.
6. **SSALC** - A report, which had been circulated by the Clerk, was briefly discussed. Cllr Chambers emphasised the support provided by SSALC. Cllr Pursehouse would like to support an organisation like SSALC however it did not provide the support required at the time it was needed. The Chairman called a vote on the membership of SSALC - there were 5 councillors against rejoining SSALC and one in favour. It was therefore agreed that membership would not be reinstated.
7. **Night Flights Consultation** - It was agreed to consider this at the February Council meeting. The deadline for comments on the consultation is 3rd March 2021.
8. **Chelsham Common/Farleigh Common & Mill Common**
 - * **Head lease Farleigh Common** - It was agreed to hold a working group zoom meeting to consider this issue prior to discussion at a council meeting.
 - * **Horse Ride Chelsham** - It was agreed to keep this issue on the agenda for future consideration.
 - * **Farleigh Sign** - The Chairman confirmed the new sign is awaited from SCC.
9. **Holt Wood** - The Clerk will liaise with TDC Officer Charlotte Parker to schedule a meeting with residents and parish councillors.
Action: CLERK
10. **Parish notice boards** - The Chairman reported that the Farleigh notice board and the Chelsham notice board are in need of repair/refurbishment. The Clerk will contact Men in Sheds for a quote.
Action: CLERK
11. **Emergency Plan** - It was agreed the Tatsfield plan template will be circulated to all councillors.
Action: Cllr Rush/CLERK
12. **Your Surrey Funding - Boys Club area.** It was agreed to set up a working group to look into possible projects including play areas. Cllr Caulcott requested to be included in the working group. Cllr Pursehouse confirmed there are covenants which

need to be considered regarding what may or may not be able to undertaken on the land.

Action: Cllr Moore/CLERK

- 13. VAS Sign/Speeding** - The Parish Council are fully supportive of having a Vehicle Activated Sign (VAS). Cllr Rush highlighted that the Parish Council is responsible for changing and and charging the batteries. Any repairs need to be arranged by the Parish Council however cover would also need to be included on the Parish Council insurance policy. Health and Safety training would need to be undertaken prior to installation of the VAS.

14. Planning Applications

14.1 TA/2020/2154/TCA

T1) - Chestnut - (Rear Garden - Middle) - Remove dead and diseased wood. (Please refer to photos provided.) Crown lift to 4M, reduce to previous points retaining healthy growth, by a reduction of approx 1.5-1.8m of the branch length. (Please refer to photos provided.) H2) - Mixed Hedge - (Rear of Rear Boundary Wall) Reduce height to approximately 2 metres from ground level (to gutter of shed). Trim back encroachment on to rear boundary wall. Fell to ground level and poison self set sycamores in left hand side corner. (Please refer to photos provided.) G3) - Elderberry & Thorn - (Left Hand Side of Boundary Wall) - Reduce to a height of approx 2m from ground level. Remove ivy from top & garden side of the wall. (Please refer to photos provided.) G4) - Group of Ash and Sycamore - (Left Hand Side of Front Garden) - Reduce height and width of all trees by up to a maximum of 3m of the branch length. Cut back overhang from property to boundary wall line. Crown lift to 2m. (Please refer to photos provided.)

Forge Cottage, Farleigh Common, Warlingham, CR6 9PE

Comment: The Parish Councillors leave to the Arboriculturist

14.2 TA/2020/2107

Erection of single storey rear extension

35 Tower Place, Chelsham CR6 9PW

Comment: In considering the application the Parish Council has found no material planning reasons for refusal

14.3 TA/2020/2055

Erection of first floor side extension

29 East Parkside, Chelsham CR6 9PY

Comment: In considering the application the Parish Council has found no material planning reasons for refusal

14.4 TA/2020/2007

Erection of crematorium and memorial gardens together with car parking, landscaping works and associated infrastructure

Land North of Old Farleigh Road, Farleigh

- * The comments drafted by Cllr Chambers, which had previously circulated were discussed. It was agreed the response was concise however it was agreed the comments in the penultimate paragraph criticising TDC should be removed.**
- * Cllr Pursehouse suggested that Cllr Chambers compile a list of bullet points of the salient issues for circulation to the TDC planning committee should the application go to full planning committee. Cllr Chambers agreed to do this however is keen to ensure that the issues are not diluted.**
- * Cllr Chambers was nominated as the Parish Council representative to attend the full committee meeting at TDC to speak for 3 minutes against the application.**
- * The Clerk confirmed that the Parish Council comments are required to be submitted by 15th January however an addendum can be added should this be required following Surrey Highways visit to the site.**

TA/2020/2007

Erection of crematorium and memorial gardens together with car parking, landscaping works and associated infrastructure

Land North of Old Farleigh Road, Farleigh

Comment: This response relates to the Application by Mercia Crematoria Developments Ltd to develop a crematorium consisting of a 'large' (Application, point 6.83) chapel containing 120 with room for 150 seats plus standing space with a service yard, administrative offices and staff facilities as well as memorial gardens together with car parking, landscaping works and associated infrastructure, including suggested future potential to expand with a second chapel, a second cremator and more parking.

Green Belt and Landscape Character.

- 1.1 Situated at the border with the borough of Croydon, the proposed site is a field in virgin Green Belt that strongly retains the rural charac-**

ter of Chelsham and Farleigh Parish, and as such performs important green belt functions, namely: to assist in safeguarding the countryside from encroachment; to check the sprawl of built-up areas; to preserve the setting and special character of historic settlements.

- **1.2 The parish council strongly represents that the site concerned and its area have performed and continue to perform an extremely effective function as Green Belt on the border with the London Borough of Croydon, preventing urban creep and at the same time providing a valuable public amenity (contra statements included in the Application such as that at 6.27). We note that 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. To allow development at this site would introduce buildings and associated development as well as considerable traffic and intensified use. These would degrade and harm the area as countryside, diminish its visual and spacial openness, and would therefore be inappropriate in functioning Green Belt.**
- **1.3 We feel that the wider character of the area is not sufficiently reflected in this Application and that the impact of such a development upon it will not be localized to the field in question, nor even to its immediate surroundings, although these will certainly be much harmed by any development. Consequently, in our own comments we have referred to the parish more broadly in order to convey a more complete sense of its landscape and character value, which we feel is underestimated in the present Application, and possibly elsewhere too, and to draw out what we feel is likely to be the detrimental impact of a crematorium development upon the area as a whole. We are in a strong position to comment on local detail and also to reflect local feeling and this, too, will be intentionally apparent in our comments, not least where we feel that local interests have been overlooked or are being poorly served by such an Application and approach.**
- **1.4 The field concerned and its surrounding area fall within an Area of Great Landscape Value, which would be harmed in a number of ways by the proposed development. The parish council believes that the environmental sensitivity, public amenity and character of the area require more and particular consideration. This is because the proposed site is in close proximity, that is within 100 metres, of a Conservation Area to its immediate south which incorporates Great Farleigh Green. Not only is this Conservation Area environmentally sensitive for its existing character and wildlife, but it also contains listed buildings such as Grade II Elm Farm House and the Thatched**

Cottage. There are a number of other listed buildings in Chelsham and Farleigh Parish, of which the oldest is nearby St Mary's Church (off Farleigh Court Road), according to the Church of England a 'medieval jewel' that is Grade I listed and held to be the oldest church in continuous use in Surrey

(<https://historicengland.org.uk/listing/the-list/list-entry/1377637>).

Scheduled ancient monument earthworks exist in Holt Wood and Henley Wood.

- **1.5 Immediately bordering the field in which the proposed site is located, to its north and east respectively, are Selsdon Wood Nature Reserve and Puplet Wood, each a Site of Nature Conservation Interest. Selsdon Wood Nature Reserve is noted for its diversity of wildlife, including 8 species of bat, deer, foxes, badgers, squirrels and over 100 different species of bird. There are spring anemones, bluebells, blackberries (that are picked for eating by the public), fungi and nuts which enrich the flora and add to it as a source of food for wild animals. Animals cross and circle the field of the proposed site and are abundant in its area. A similar range and distribution of wildlife, including protected species, characterize the wider area.**
- **1.6 Notably, there is a live badger sett in the north corner of the proposed field, which is covered by the Protection of Badgers Act 1992. East Surrey Badger Protection Society have objected to the development of a crematorium on this Green Belt field, which the resident badgers use for foraging. These badgers, and the wider community of badgers of which they are a part, would be disturbed both by the construction and operation of such a facility. Moreover, they would naturally enter and dig up planting and soil within and around any memorial garden or landscaped area. Bats and Roe deer also use the field in question, as does a range of other wildlife. Artificial lighting schemes, security lighting, publicly lit areas, noise, movement, increased use of lanes and land around the site will all unavoidably interfere with their natural habitat.**
- **1.7 The wetland area proposed in this Application is where the badger sett is situated, a clear conflict both of purpose in creating that area apparently for the benefit of the environment and wildlife and also with policy designed to safeguard protected species. To further underscore our point we quote directly from the objection of the East Surrey Badger Protection Society, 22 December 2020, stating that: 'There is an active badger sett in the north corner of the proposed crematorium site with several other setts in the adjoining Selsdon woods. This site is made up of short grass sward which is badger's preferred foraging habitat. It's worth noting that badgers will dig into**

graves and, as many crematoriums have experienced, tend to be fairly disruptive to graves and gardens. For these reasons the East Surrey Badger Protection Society objects to the proposed crematorium.' We note in this regard CSP17 and DP19 of TLP pt 2.

- **1.8 Furthermore, Great Farleigh Green is bordered at its southern and eastern extremity by Littlepark Wood, adjacent to which is Greatpark Wood, both of which are ancient woodland and Sites of Nature Conservation Interest with a rich diversity of well-established wildlife.**
- **1.9 Bordering the eastern edge of the proposed field is Baker Boy Lane (lane 591), which is a public bridleway, much used by riders throughout the year. Horse riding is popular in the Chelsham and Farleigh area, for example there is a nearby stable on Farleigh Court Road. Walkers (including families with children and those with pets), joggers, horse riders and cyclists regularly use the existing paths and also the only narrow, winding through-road, Old Farleigh Road. The field in question and its surroundings thereby provide an important and valued rural amenity, not only to parish residents but also to local people from nearby Forestdale and Selsdon Vale where, less than a mile away from the proposed site in a direct line northwards, is Ofsted rated 'outstanding' Greenvale Primary School.**
- **1.10 We note a conflict with CSP13 which seeks to protect the Rights of Way network from developments that would adversely affect the enjoyment of users of the network, a policy that has particular regard to the Vanguard Way of which Baker Boy Lane forms a part.**
- **1.11 The field concerned is visually open to the west from Old Farleigh Road and its elevated grass verge, to the east along Baker Boy Lane and is also visible from the north to users of Selsdon Wood Nature Reserve, which contains open fields amounting to about a quarter of its extent as well as woodland and many paths where the public are free to roam. In short, open views of the field are available from all the paths and land that surround the field. The proposed application would seek to close these views, including with new hedgerow and fencing along the entirety of the western border, as well as internal planting and buildings with, moreover, possible future expansion in mind.**
- **1.12 Chelsham and Farleigh Parish Council firmly believes that the landscaping and other measures presently suggested to mitigate development of this site, including the provision of a 15 metre buffer zone between the development site and surrounding viewpoints into it (the minimal requirement of Natural England), will be inadequate to prevent harm to the existing character and environment of the open field and its area, and indeed may exacerbate that harm. This is because any development and its screening would act to occlude views**

into and across a previously open field, through route and habitat for wildlife. The field's distinctive surroundings are typified by a mix of open fields and woodland that is termed Chalk Down with Woodland (CD6, Surrey Landscape Character Assessment 2015), whose largest concentration in Tandridge is to be found exactly in the area concerned, and which the proposed development and introduced planting would not respect. Development would act to break up the mosaic of field and wood that characterizes this area, and it would definitely harm the existing site and its Green Belt surroundings.

- **1.13 Woodland in the area is deciduous, and any screening to match this setting would take considerable time to establish and reach maturity, and would lose its leaf cover in winter, thereby failing to screen continuously the proposed buildings and infrastructure. Contrary to claims made in the Application, the council does not believe that, even during spring and summer, this development could be hidden from public view at various places around a perimeter that is formed entirely by publicly accessible rights of way and Green Belt. Significantly, Mercia's Application admits that a crematorium would not be wholly concealed from outside view, even from Old Farleigh Road, points 6.30–3, 6.43 and so forth. The extent of the buildings, their road network and parking, plus the number of vehicle movements that will take place for 51 weeks of the year will inevitably have a visible and audible impact on the surrounding area, including in the twilight and dimness of shorter autumn and winter days. Mercia Crematoria repeats that there is a fall in the field from south to north of about 5 metres, and that the main buildings will be set back from Old Farleigh Road, but it still cannot claim that this will conceal the buildings and their infrastructure from view in that direction, for example at 6.28. At point 6.83 the applicant calls the chapel 'large', and its height would be approximately 6.5 metres to the crematorium roof, with flues approx. 2.7 above roof level. Overall, the flues are approximately 9.2 metres high (Thomas Wilson architects figures). Moreover, existing plans show 3 chimneys, which would appear excessive unless the development already incorporates structures to accommodate a much larger facility (at least double the size), which is not at face value what the public would understand from the existing Application (Site Plan and Elevation drawings 1600–26 and 1600–27). In this regard we observe that the Application in its now scaled-back form contains plans to expand any crematorium permitted on this site. See Application points 4.10–13, which explain that the present proposed development is 50% less than that originally drawn up for and discussed with Tandridge District Council planning authority.**

Indeed, the present Application explicitly suggests that future expansion could take place eastwards of any permitted building.

- **1.14** There is considerable public concern not only at the size and scale of these plans, but also at this method of proceeding by creeping applications designed to increase development beyond what the public are initially led to believe, and contrary to what Green Belt should permit in terms of urban creep.
- **1.15** The council stresses that the field in question provides open views across the proposed site from the immediately surrounding ancient woodland, nature reserve, bridlepath and Old Farleigh Road with its grass verge used by walkers. The construction of buildings, ancillary forms of development, landscaping and screening by planting would combine to alter cumulatively the character of the field from its existing undeveloped and visually open appearance. This would diminish public enjoyment of a rural amenity by restricting views into and across it, and by permanently altering the existing character of the field and thereby adversely affecting its surroundings. This site and its area fall in an AGLV, and due regard should therefore be paid to policies protecting and enhancing such areas, among which are NPPF 170–2, CSP18, CSP20, CSP21 and DP7 of TLP pt 2. We also note conflict with CSP1, which requires new development to be located at existing built-up areas so as, among other things, to promote sustainable travel patterns.
- **1.16** The natural, open character of the area at the proposed site is ensured by the absence of pavements and street lighting, by the presence of farmland and other fields, and by interspersed woodland criss-crossed by rural lanes and woodland paths. Access is via a single through-road or by a network of rural public rights of way, all which also acts to preserve suitable local habitat for animals and a valued public amenity. There is little development anywhere in the immediate vicinity, except for a small row of four period-style cottages, collectively known as ‘Willoughby cottages’. There is at best limited public transport via the 357 and 409 bus services, both of which terminate at Selsdon library and can be intermittent. The 357 does not run at all to Farleigh on weekends. There are also questions as to whether these bus services will be maintained in the future due to closures. Nearby Cranmer Court care home has, since construction in 2003, had to nearly double its parking spaces due to the reliance on private transport of staff and users unable conveniently to reach the home by other means.
- **1.17** The Application proposes eighty parking spaces for mourners and an overflow area that will be used by 6 staff members, which may

prove inadequate for a chapel that has a capacity for 120–150 mourners plus standing space, not least because many mourners arrive early, in effect causing services to overlap. We note here that the Transport Assessment in the present Application says that the most comparable crematorium to that being proposed at Farleigh is Seven Hills Crematorium in Suffolk, and that has 200+ car parking spaces.

- **1.18** Given the above considerations, the council believes that the proposed building and associated development would seriously harm and be inappropriate to the Green Belt in question, consistent with national and local planning policies, for example NPPF paras 143–6 and DP10 and 13 of TLP pt 2. The parish council will refer from time to time to the Core Strategy, 2008 (CS) and to the draft Local Plan, even though the planning inspector has in his recent letter (11 December 2020) called for the latter to be redrawn, but the parish council will do so only periodically and where these documents appear to be in clear agreement with each other and with national policy. On the point of inappropriate development in the Green Belt, however, there seems to be no obvious grounds for disagreement.
- **1.19** The council further observes that the landowner, Merton College, Oxford, has stressed that ‘importantly our site (Farleigh) is large enough to comfortably accommodate a new crematorium with more than sufficient space for future expansion if required for multiple chapels or crematories’. This statement, emphasizing the possibility of future expansion, comes from Merton’s objection to the failed proposal by Horizon Cremation to build a crematorium at Oxted, Merton instead arguing that the site in Farleigh is more suitable, 28 May 2020. The Horizon proposal was for a number of reasons rejected by the Tandridge District Council case officer on 22 September 2020, thus meaning it never came before the district council’s planning committee (the same outcome as the Blindley Heath proposal). Although the current decision can only be made on the basis of the application before us, the implications of Merton’s comments with regard to the Farleigh site are obvious, and they further underscore the importance of the protection extended to countryside with AGLV status in the Green Belt. We therefore strongly advise and request a similar response to the present application as was previously given in the cases of both Oxted and Godstone.
- **1.20** Most of the driveway, pathways, hardstanding areas, swale basins and the ‘wetland’ are situated less than 50 yards from the established public bridleway Baker Boy Lane, which proximity is apparently precluded by the Cremation Act 1902. Moreover, based on existing plans and statements, it would appear that were plans for future

expansion to be permitted then the proposed additional carpark contained in them would also encroach within 50 yards of Baker Boy Lane. Further, residents at Tudor Cottage and Farleigh End in the row of 'Willoughby cottages' insist that their dwellings are within 200 yards of the gateway and driveway into the proposed development which also, they argue, contravenes the 1902 Cremation Act.

- 1.21 The Federation of Burial and Cremation Authorities (FBCA) in 2019 advised that 'gardens of remembrance are essential, as a place of quietness and beauty, which should not be overlooked, but with most of the area being available for the strewing or burial of cremated remains', but we question whether the proposed development provides such surroundings since the 'Memorial gardens' are so close to the Old Farleigh Road and the main route into and out of the site. FBCA also advise 'strewn remains to be recorded within defined periodic strewing areas, situated well beyond the site of any future building developments or extensions'. According to the Cremation Act of 1902 human ashes may not be strewn within 50 yards of Baker Boy Lane.

Roads, Traffic and Local Infrastructure.

- 2.1 The Application at 6.63 predicts 242 vehicle movements per day in and out of Farleigh to the proposed site, which is 61,710 journeys over a 51-week year into and out of this sensitive area. The impact of such a dramatic local increase in traffic will be considerable, and in our view could not satisfactorily be mitigated. Such a development would considerably increase traffic to and through Farleigh, and with it congestion and pollution (including noise, light and litter). This increase will also impact road safety locally, about which we as a council are already concerned, and it would certainly impact on the enjoyment of this area as an amenity by the public.
- 2.2 We further note that some of the data used for the Transport Assessment appears to be out-of- date despite requests for it to updated by Surrey Highways during pre-application advice. In the Transport Assessment, for example, Paul Mews Associates used trip generation data from 2013 for 3 crematoria, namely Seven Hills in Suffolk, West London Crematorium in Kensal Green and Bournemouth, which remains problematic since it is not clear how comparable these particular sites are given that no information is provided about their capacity relative to that of the proposed development. Moreover, since plans for possible future expansion are concealed within the present Application, it is unclear what the ultimate traffic increases may actually be. In addition to which, it is not clear whether in practice any operator of a crematorium would not be at liberty to increase the

number of daily services, to change the daily schedule for them or to offer them during the weekend as well as throughout the week. Crematoria commonly offer discounted services at 9am and after 4pm, which might again have consequences that affect school and commuter traffic. There is no time limit in law on the operation of cremators, which may be used 24 hours a day during which time a cremator could cremate between 6–12 bodies according to a FT III Facultatieve Technologies brochure.

- **2.3** We further note that memorial gardens are usually open for extended hours and frequently all week. Visitors to the memorial gardens, staff traffic, support services moving to and from such a facility, sometimes in heavy vehicles, would all act to increase traffic levels locally.
- **2.4** As stated, access to the proposed site is at best poor without a private car. The sometimes steeply undulating, narrow rural roads locally are not suitable for increased traffic usage, and nor for the proposed levels of slow-moving funeral cortèges, including during mornings and evenings at rush hour and school drop-off and pick-up. In the direction of Selsdon is Greenvale Primary School and Croydon High School for Girls, and in the direction of Warlingham is Warlingham Village Primary School, plus at Chelsham there is Warlingham Park School. At the proposed site there is no pavement in either direction along Old Farleigh Road, whose elevated grass verge is mainly used by those enjoying the open countryside by walking or cycling. Installing footpaths, bus stops and shelters, crossings, traffic controls, lighting and other paraphernalia for the purposes of access to a crematorium would not be in keeping with such open countryside and its existing enjoyment as an amenity by the public. Mourners without a car, particularly those who are older or who have mobility issues, would find such a site particularly disadvantageous, not least due to having to dismount at the proposed bus stops and cross an already dangerous stretch of road, and then traverse some distance to enter and then reach the crematorium buildings at the rear of the site. Any inconvenience to mourners dismounting in Old Farleigh Road would be heightened during lengthy periods of wet and cold weather throughout autumn and winter. See CSP12 and NPPF 84.
- **2.5** We add that removing most if not all of the splitter island adjacent to the existing golf course entrance in order to make a right hand priority junction for the proposed crematorium could prove dangerous. This is because the island was installed to reduce the speed of drivers at this point in the road where, in addition to turning into the golf course, traffic must also safely enter and exit a lay-by serving Willoughby

cottages opposite. We note in this regard that although there is a 40mph speed limit on the narrow stretch of road passing the site, vehicles frequently travel much faster than this. It is likely in these circumstances that, among other things, drivers will attempt to overtake slow moving funeral traffic, as was exemplified at Titsey Hill when the speed limit there was for safety reasons temporarily reduced to 30mph and overtaking increased considerably.

- **2.6 Old Farleigh Road leads towards Croydon from Warlingham village to Selsdon. This road becomes congested due to commuting, natural traffic flow and school runs taking place from early to mid morning and from mid to late afternoon and evening. At Selsdon on the way into Croydon there is a busy junction, where there is a supermarket, large hotel and busy high street and, as explained, on the way to this junction are two schools. Consequently traffic congestion regularly backs up from Selsdon into Farleigh itself, and similarly is heavy along Limpsfield Road to Sanderstead, the other direct southerly route from Warlingham to Croydon. Old Farleigh Road is not a favourable route for the levels of increased traffic predicted in these proposals, and greater congestion along it would impact on the wider network.**
- **2.7 In the other direction towards Warlingham the roads are frequently difficult to negotiate. The tight mini-roundabout junction of Farleigh Road with Sunny Bank is prone to flooding, and is a regular traffic choke point, not least because of Warlingham Village Primary School. If peak operating hours for a crematorium are assumed – but not guaranteed in practice – to be between 10am– 3pm, then because of school pick-up there would be and indeed currently are particular difficulties leading into and out of this road each afternoon during term time. Parents with children frequently cross Farleigh Road at multiple points. The same concerns apply elsewhere where school traffic exists, for example on the approach to Selsdon as explained. Residential and other parking means that winding, undulating Farleigh Road leading into Warlingham’s extremely busy village green often only permits one lane for traffic, and mounting the pavement to pass oncoming traffic is frequently unavoidable. As a result, anti-social road rage is common. Parking is a perennial problem around the green and its area.**
- **2.8 Similarly, Sunny Bank is regularly only one-lane traffic due to parking and, like Harrow Road, has become a rat-run for those avoiding Warlingham green and seeking to reach Selsdon via Old Farleigh Road. Traffic accidents are frequent, for example Chelsham and Farleigh Parish Council chair’s car was written off in Harrow Road while stationary by a collision that took place a month ago, since**

when further collisions have taken place along this road. Harrow Road at its western end is single-lane traffic due to residential parking, and at its eastern end is prone to flooding. It here leads into rural Chelsham Road, which is undulating, hedge-lined and, like most of these roads, also carries regular horse and cycle traffic (there is a paddock along it).

- **2.9** Beyond the immediate Warlingham area towards the M25 and central Tandridge, the topography falls steeply off what is a high point in the North Downs (Botley Hill is the highest point in Tandridge and the North Downs) towards the A22, where there is frequently congestion. In winter snow and ice make inclines like Succombs Hill, with its gradient of up to 25%, unusable. Numerous accidents occur on Succombs Hill, an unfortunate state of affairs to which a solution is not obvious, <https://www.getsurrey.co.uk/news/surrey-news/not-much-can-done-prevent-15365930>. Succombs Hill, Bug Hill and Haliloo Valley Road are all width restricted as well as being steep, and the latter turns onto the B269 at a well-known accident hotspot. Hillbury Road is the most suitable local road to ascend towards Warlingham, but it is the HGV route into the village and it links into the west of the village on the opposite side from the proposed development.
- **2.10** The altitude above sea level of Chelsham and Farleigh, and its open fields and hedge-lined lanes, mean that snowfall can be heavy and, when it is, blows across fields and piles into the lanes making them impassable or extremely difficult to use, in bad years for long periods of time. Old Farleigh Road is no exception. Ice comes early and lingers in lanes and hollows, including in the dip at the border with Croydon along Old Farleigh Road immediate north of the proposed site (see below). We understand that because this bend is at the border between Tandridge and Croydon it is not gritted.
- **2.11** The parish council has taken opportunity to stress these particular issues because the local road network in the direction of Warlingham was never intended for high traffic usage and is already under clear strain, and we therefore view this as a significant detrimental factor in relation to the current Application.
- **2.12** We disagree with claims such as that in 6.78 of the Application, which state that increased traffic and with it noise and disturbance would not take place along Old Farleigh Road as it passes through the Conservation Area such as to affect its 'special character' or, indeed, have an impact upon the road network beyond that point.
- **2.13** We add, specifically, that where Old Farleigh Road reaches the Croydon border immediately north of the proposed site there is a tight, dipping, wooded double bend at which there are very regular traffic accidents. There are also accidents along the approach to this double

bend leading past the proposed site, where drivers gather speed before having to brake at the double bend as the road enters a natural and slippery hollow. Most recently a serious accident occurred here in January 2021, in which there was no collision between vehicles, but the driver coming from the Farleigh direction lost control at the double bend and rolled deep into the roadside trees. The accident led to more than one road closure over more than one day for emergency services to attend the scene and recovery to take place. This stretch of road does not, for these reasons, appear safe for crossing by mourners, and any stopping buses would not have a safe place to pull in given its narrowness, elevated grass verges (and highways drainage ditch on the western side) and lack of any existing pavement. Buses stopping on this narrow road would impair visibility for other traffic and cause undesirable lane switching and overtaking. The Application proposes that mourners should cross the road having alighted on its western side, which is a risk, especially to older or less mobile pedestrians. Yet, as pointed out elsewhere, paving, lighting, adding a crossing, more signage and other paraphernalia would have an urbanizing impact inappropriate to the Green Belt. There have been various accidents, including, tragically, a fatality on Great Farleigh Green where in recent times a motorcyclist resident of Harrow Gardens lost his life in a traffic incident that took place on a Sunday morning. We here have regard to such policies as DP5 of TLP pt 2, which seeks to ensure that development does not impact highway safety and is sustainable.

- **2.14** In addition, we feel that it would be unfair to mourners in numerous slow moving funeral cortèges, or those making their way by public transport to such a location, to be caught in stop-start traffic or otherwise involved in delays on roads such as these.
- **2.15** Notwithstanding the planning officer's recent letter regarding the draft Local Plan, in that document some 400 dwellings were originally targeted on Warlingham, some 50 of which were to be sited on allotments and paddocks along Chelsham Road above Greenhill Lane, at HSG16 (or HELAA WAR 011 and WAR 023). The 400 dwellings allocated in the draft Local Plan to envelop Warlingham is more than the number allocated to any other Tandridge settlement, apart from the abortive garden settlement suggested for South Godstone, and it is more than half the dwellings allocated in the plan to all other similar settlements in the district. Greenlawn Memorial Park, belonging to the London Borough of Croydon and situated along Chelsham Road, has also recently been granted permission to expand, with room for future expansion being available at this location. In addition, sheltered accommodation at Uplands, adjacent to the roundabout into which

Chelsham Road leads, is being demolished to build 21 dwellings. Insofar as some if not all of this building may take place, it will adversely affect the character of the Warlingham area and also that of Chelsham and Farleigh, and it will further impact on traffic levels along the roads described above, which are increasingly becoming hazardous rat-runs.

- **2.16 There is a complete lack of facilities in the immediate area of the proposed site. Shops, places to eat and other necessary services are lacking or entirely absent, contrary to what is stated in the Application. This would create inconvenience, require considerable mitigation or further development to address, and almost certainly increase traffic due to mourners having to seek refreshment or hospitality elsewhere, including towards Selsdon. We note that in the Application the suggestion is made to give access for mourners into rural Baker Boy Lane from the proposed crematorium by breaking through ancient hedgerow in two places. This would harm the existing hedgeline border between the site and the bridleway, which we believe should be preserved in order to protect the area's character in accordance with policies already referenced above. We do not, in any case, see how during autumn and winter periods grieving mourners unfamiliar with the area could easily use a muddy, unlit bridleway, and nor might it be safe for them or for horseriders if they were allowed to do so. The paucity of facilities in the area is, we feel, illustrated by this sort of suggestion.**
- **2.17 At point 3.14 in the Application it is claimed that the proposed chapel will have a large, full-length window 'providing pleasant views of the edge of Selsdon Wood', but elsewhere it is claimed that views directly into the facility will not be possible in order to preserve the local character and Green Belt. The same point explains that mourners will exit via a 'flower court porte cochere, with a one-way path back to the car park, again thereby avoiding mixing between funerals', but presumably mixing will be inevitable both inside and outside the site if mourners are encouraged to wander into an adjacent public bridleway and nearby woodland 'should they wish either following a service or when visiting a memorial of a loved one' (3.8). Such contradictions serve to underscore the problems associated with locating a crematorium in such a location.**
- **2.18 There is virtually no street lighting on Old Farleigh Road in the Farleigh area (two posts only exist at the Golf course entrance) and none through the Conservation Area, and the introduction of more lighting would damage the area's rural character and detrimentally affect its wildlife. Selsdon Wood, for example, has 8 species of bat, and**

bats are common throughout local woodland, the lack of artificial lighting in the area providing the preferred habitat for sensitive nocturnal animals of this and other kinds, such as badgers. The stretch of Old Farleigh Road passing the proposed site is unpaved, includes ancient hedge, with occasional mature oaks and other growth adding to its character, but which would not facilitate pedestrian mourners and which, because these things are characteristic of the existing AGLV location, deserve preservation.

Environment and Pollution.

- **3.1 Emissions from an operational crematorium could be harmful to local wildlife and communities, including nearby Selsdon Vale where, as stated, Greenvale Primary School sits less than a mile from the proposed site, as also to the residents of Chelsham and Farleigh. Hydrogen chloride, mercury, dioxins, nitrogen oxides, carbon monoxide, carbon dioxide and mercury are all discharged by cremation (notwithstanding mercury abatement). The average cremation still releases 2–4 grams of mercury. To this may be added the discharge from incinerated coffins, including nitrogen dioxide in the case of chipboard or MDF ones. Indeed, the incineration of a single coffin of this type releases an equivalent amount of nitrogen dioxide matching that of a typical car driven for two or more thousand miles. Although Mercia Crematoria say that they will install NOx systems for any cremators, at present there are no legal requirements to enforce their use. Inevitably, with time and use a crematorium will discharge toxins that will enter the atmosphere locally, being breathed in by people and animals, or otherwise entering the existing sensitive ecological systems where they will also be absorbed.**
- **3.2 Increased carbon dioxide and other emissions from greater car travel to and from Farleigh are a serious concern that is downplayed or even denied in the present Application. The entire borough of Croydon is designated an Air Quality Management Area, and its council has declared a climate emergency, as has that of Tandridge. Building a crematorium in Green Belt at Farleigh is inconsistent with such a position, and would encourage increased traffic back and forth from Croydon, which already has a crematorium of its own whose catchment area includes Farleigh. On 8 September 2020 the MP for South Croydon, Chris Philp, called for Tandridge District Council to reverse its decision against an EIA regarding the proposal for a crematorium at Farleigh, which he also described as a ‘terrible proposal’, stressing similar concerns to the ones that we raise here. We note the recent coroner’s court judgement in the tragic case of school-**

girl Ella Adoo-Kissi-Debrah that air pollution ‘made a material contribution’ to her death which, among other things, serves to raise concerns about air pollution, especially as it affects young and vulnerable people, concerns shared by the parish council.

- **3.3 In addition, it seems regrettably unavoidable that increased traffic to and from the proposed site by staff and support services alike, as well as by mourners, will cause increased noise, light, and litter as well as greater air pollution locally.**
- **3.4 The council further notes in this regard that the local area includes farmland used to produce crops and livestock for human consumption. The proposed site is currently used for agricultural purposes to raise livestock and cereals, and is of good Grade 3 quality.**
- **3.5 Construction would inevitably impact the immediate area in various detrimental ways.**
- **3.6 Locally there is low level air (plane and helicopter) traffic to and from Biggin Hill, and occasionally from other destinations too. This will disturb services and mourners at such a site.**

Special Circumstances.

- **4.1 We strongly take the view that the applicant has not demonstrated convincingly that there are very special circumstances that would outweigh harm to the Green Belt caused by development of a crematorium at Farleigh. We do not believe that there is a significant need for crematorium facilities in this area that might represent a very special circumstance to justify such development in such a location.**
- **4.2 Croydon and Beckenham are the closest local crematoria to north Tandridge. Statistics from the Cremation Society show that Croydon crematorium is operating below practical capacity and below qualitative standard, and so can cope with existing demand as well as seasonal changes in mortality. Beckenham is still within capacity, and its operation cannot properly be considered without bearing in mind that its catchment area will significantly overlap with those of two recently approved crematoria at Oak Tree Farm, Halstead, and Darenth in Dartford, with the consequence that Beckenham will in the near future have further core services available. Cortège travel times to Croydon and Beckenham are within 30 minutes drive time from north Tandridge, including Warlingham and Caterham. Since there would be significant overlap in catchment between Croydon and Beckenham crematoria and any crematorium at Farleigh, the latter would be less likely to be viable and would further reduce existing capacity in its neighbours. A considerable amount of the service provided by a**

crematorium at Farleigh would be to residents of Croydon rather than Tandridge, since Farleigh is located at the district's most northerly point. Moreover, Oak Tree Farm would also serve Oxted, the east of Warlingham and Caterham, thereby further impinging on any crematorium at Farleigh. Oxted is within 30 minutes drive time of Surrey and Sussex Crematorium, and a rural cortège drive time of 45 minutes further increases the catchment of Surrey and Sussex Crematorium across Tandridge. Indeed, mid and southern Tandridge is close to Surrey and Sussex Crematorium, so close in fact that residents in these areas would be unlikely to use Farleigh. Wealden Crematorium in Horam, East Sussex, has not reached maturity yet, and will take customers from Surrey and Sussex Crematorium and from Kent and Sussex Crematorium, thereby further increasing the service capacity available across swathes of Tandridge. In addition to which, Reigate and Banstead Council is about to submit a planning application to build and run its own crematorium at Woodhatch that would serve Farleigh and, more widely, East Surrey. We strongly dispute that there are very special circumstance arising from such a situation as this that might justify the further proliferation of crematoria into an area of existing AGLV Green Belt status like Farleigh. See CSP1, CSP20, CSP21, DP10 of TLP pt 2, DP13 of TLP pt 2, TLP03, TLP31, TLP32, TLP34, TLP43 and, especially, NPPF para. 144.

- **4.3 Burial capacity locally has not been reached, and other options have not been fully explored or exploited, including brown field sites. Mercia Crematoria Developments Ltd advance the argument that because there is plentiful Green Belt in the Tandridge area, this justifies building on it, but the basis of Green Belt is to prevent development not to justify it. By contrast Mercia Crematoria have not produced a site search to demonstrate that they have exhausted other options elsewhere, not only in Tandridge but also in immediately adjacent Croydon or other districts. A site more centrally placed in Tandridge could clearly better serve not only the north of the district but also the rest of it, but as has already been demonstrated by rejections in the cases of both Oxted and Godstone there is no need in Tandridge to build crematoria.**
- **4.4 An expansion of nearby Greenlawn Memorial Park belonging to the Borough of Croydon has just been permitted along Chelsham Road.**
- **4.5 All Saints Church in Warlingham has recently gained further burial ground space totalling 5 acres, the first 2.5 acres of which is intended to serve the church for 2–300 years.**

- **4.6 In such circumstances the siting of a crematorium on Green Belt in Farleigh does not appear justified.**
- **4.7 Mercia Crematoria attempt to suggest in their Application that a variety of reasons of a ‘social, economic and environmental nature’, no single one of which represents a very special circumstance, can together cumulatively represent a very special circumstance to justify Green Belt development, for example at 6.83. They request that substantial weight be afforded this view, but the logic as well as the planning policy basis of doing so appear highly questionable. Moreover, the reasons listed are themselves individually unconvincing. For example, a crematorium at Farleigh would create only limited employment. Point 6.83 states that the proposed one would result in the equivalent of only 6 full time employees. Additionally, a good deal of any indirect economic activity (eg. florists, funeral directors etc.) that might be created by such a development would be just as likely to go to Selsdon as to Warlingham. In the same section Mercia Crematoria claim that 100% of local funeral directors agreed that there is a need for a new local crematorium. Yet in Section 4 of the Application it is revealed that only half of the funeral directors canvassed by Peter Mitchell Associates actually bothered to respond to the questionnaire that they received despite their having an obvious commercial interest in what it contained. Moreover, and significantly, Section 4 incorrectly states that local residents and their representatives were consulted by Mercia Crematoria. In fact, Mercia Crematoria failed to write even to all four of Willoughby cottages (tellingly Farleigh End was left out), and it did not write to any households in the neighbouring community, such as Farleigh Court Road, Harrow Road, Sunny Bank, the rest of Old Farleigh Road, Farleigh Road, Chelsham Road and Great Park – all which have a demonstrable interest in this matter and have since expressed considerable opposition to the proposals. This does not appear to represent meaningful engagement with the public, and to that extent the Methodology that is presented in Section 4 appears incomplete and misleading. Mercia Crematoria excuse themselves by claiming that COVID-19 restrictions made it difficult to consult properly, but they also admit being able to consult remotely (point 4.3). Moreover, the parish council continued regularly to meet online throughout the crisis, and it has not been approached at any stage by Mercia Crematoria, even though discussions between Mercia and Merton College regarding a possible crematorium at Farleigh date as far back as January 2018. On 8 September the MP for South Croydon, Chris Philp, called for Tandridge District Council planning department to reverse its decision not to have an EIA, and he described the crematorium plans as a ‘terrible proposal’.**

Mrs M Gibbins	Telephone	£ 8.93
HMRC	PAYE & NI	£ 260.00
DM Payroll	Payroll Service	£ 60.00

17. Matters of urgency

The Chairman reported that quite a few 8 ton lorries have been seen going into Highview. It was agreed that TDC need to be notified.

Action: CLERK

Items for future Agendas

Highview

Horse ride

Bins

Emergency Plan

Your Surrey Fund - Boys club

Night Flight Consultation

Meeting ended at 21:00