

**From:** Lisa Jackson lisa@jacksonplanning.com  
**Subject:** DM/20/2877 - District Planning Committee 17/12/20  
**Date:** 8 December 2020 at 16:56  
**To:** Sally Blomfield Sally.Blomfield@midsussex.gov.uk  
**Cc:** Jennifer Bale Jennifer.Bale@midsussex.gov.uk, Mark Brassey mb@cbglaw.co.uk, Andrew Tabachnik QC Andrew.Tabachnik@39essex.com, Mark Gibbins mark@indigolandscapes.co.uk, kathryn.hall@midsussex.gov.uk, Peter Mitchell Peter@PeterMitchellAssociates.co.uk



Dear Sally,

I have now read the Officer's report for the above application.

I am extremely disappointed about the recommendation, but more importantly the report is not a balanced and reasonable assessment of the application against planning policy and all material considerations and as currently presented would appear to seriously misdirect members. This is your report and as Head of Planning, it is your duty to act competently, honestly and with integrity and you must not allow any misdirection of the committee as a result of a partial officer report.

There are five key areas that would materially mislead Members regarding a reasonable and balanced assessment of the application.

1. The officer has gone back on his assessment of landscape impacts based on what was agreed as common ground on 13.11.20 and has significantly overstated what was the commonly agreed landscape impact of the proposal
2. The officer report seriously misrepresents policy DP25 - nowhere in the policy does it require an applicant to demonstrate an overriding or overwhelming need (serving a population of 122,000+ population in Mid Sussex meets a significant sustainable community need in any event)
3. The officer report completely misrepresents the critique of the need assessment by your consultant: the Beacon Dodsworth critique confirms that there is a need for additional Crematorium capacity, and that the application proposal will largely serve Mid Sussex. The officer report does not represent the qualitative case for the proposal, including the accepted standards on core capacity acknowledged in numerous appeal decisions and express support from faith communities. It must be reported accurately.
4. The officer report suggests the applicant does not assess potential additional capacity at Sussex and Surrey Crematorium. We did consider this in detail in my letter of 19 November Page 4- this is not reported at all.
5. At no point in the assessment of the application does the planning balance and conclusion consider the significant fall-back position on this site as set out in detail in the planning statement and applicable by virtue of case law

Taken together these are all serious points that would lead, in our opinion, to a quite different assessment of the proposal when properly and fairly considered against all the material considerations in this case. Failure to properly consider all the relevant issues in a fair, balanced and reasonable manner would be tantamount to unreasonable behaviour.

I am going through the report in detail with our Barrister, but it is a long report without paragraph numbers or pagination so it will be very difficult to address matters logically. We will respond in detail shortly. However, I believe in the interim it would be helpful to understand how you will address our key concerns, set out above, and we can discuss the best way to allow a detailed, fair and balanced assessment to be presented to Members.

I look forward to your response, can we speak as a matter of urgency, hopefully tomorrow?

Kind regards,  
Lisa

Lisa Jackson  
Jackson Planning Ltd  
Fox Barn, Lower Chute,  
Andover, Hants, SP11 9DU

[lisa@jacksonplanning.com](mailto:lisa@jacksonplanning.com)  
[www.jacksonplanning.com](http://www.jacksonplanning.com)  
t 01264 730286 m 0755 400 6494

