
From: Jane Cooper
Sent: 08 September 2020 12:49
To: Andy Watt
Subject: DM/20/2877
Attachments: DM.20.2877 Crematorium Turners Hill.docx

Hi Andy,

I attach my comments.

Kind regards,

Jane Cooper
Environmental Health Officer
Mid Sussex District Council
Environmental Health
Tel: +44 (0)1444 477437
Email: jane.cooper@midsussex.gov.uk



DM.20.2877 Land North of Turners Hill Road, Turners Hill. West Sussex

Outline application for single chapel crematorium with a single abated cremator and natural burial site with associated access, car parking, landscaping and drainage. All matters reserved apart from access.

This site currently has extant planning permission and part implemented consents for use as a natural burial site. In addition, the site has various other permissions for a chapel, reception building, barn/workshop and associated parking. This application proposes a scheme to rationalise these permissions to provide a crematorium to complement the natural burial function.

An air quality assessment has been carried out by Entran Limited and detailed air quality modelling using the AERMOD 7 dispersion model has been undertaken to predict the impacts associated with stack emissions from the cremator. This assessment concluded that predicted maximum process concentrations of emissions at sensitive receptor locations are well within the relevant air quality standards for all pollutants considered and therefore the impact on air quality in these locations will be negligible.

It is worth noting that Environmental Protection at Mid Sussex District Council will have a regulatory role at the site if the proposal is approved. Crematoria are one of the activities that require an environmental permit in accordance with the Environmental Permitting (England & Wales) Regulations 2016. Environmental permits contain conditions which ensure that best available techniques are being applied to minimise and control pollution. As a Part B regulated facility, Crematoria operators are required to control emissions to air and, as a new installation, would be required to meet the most up-to-date abatement technology.

Therefore, if permission were to be granted for this planning proposal then an application would be required for an environmental permit to fulfil the pollution prevention and control legislative requirements. DEFRA has produced guidance on what is deemed best available technology and, as a new process, the requirements for arrestment plant for mercury and dioxins would be required at the outset. The guidance is found in Process Guidance Note 5/2 (12) produced by DEFRA.

In addition to the impact of emissions from the crematorium stack, emissions from traffic generated during operation of the proposed development should also be considered. Although the site is not in or close to an Air Quality Management Area, given the site area, an emissions mitigation assessment would be required. Should this development be granted planning permission, I recommend that a condition be applied requiring the mitigation of emissions.

Air Quality: Prior to the commencement of construction of any part of the development hereby permitted, the details of a scheme of mitigation measures to improve air quality relating to the development shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall be in accordance with, and to a value derived in accordance with, the Air Quality and Emissions Mitigation Guidance for Sussex which is current at the time of the reserved matters application. All works which form part of the

approved scheme shall be completed before any part of the development is occupied and shall thereafter be maintained in accordance with the approved details.

Informative – In order to ensure approval, we strongly recommend that the above scheme is agreed in advance with the Council's Air Quality Officer.

Reason: to preserve the amenity of local residents regarding air quality and emissions.

02.09.2020

Jane Cooper

Environmental Protection