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If Calling Please ask for: Amanda Wilkes  
Date: 30th November 2021

Dear Sir/Madam,

**The continued winning, working and processing of sand from the existing Rock Common Quarry, the importation of inert classified engineering and restoration material, the stockpiling and treating of the imported material, the placement of the imported material within the quarry void and the restoration and landscaping of the quarry**

**Tarmac Southern Limited, Rock Common Quarry, The Hollow, Washington**

I refer to the consultation received in this office on 14th July 2021 concerning the above site.

This Authority has the following comments to make:

The supporting statement submitted with the application states that Rock Common Quarry has been active since the 1920's and has a long and extensive planning history. The current planning permission was granted in 2004 and allows sand to be extracted and processed until the end of 2020.

The application seeks to allow the continued working of the remaining reserves of sand within the quarry and secondly to vary the currently approved restoration scheme for the quarry by using imported, inert restoration material to infill the quarry void and provide a safe and sustainable 'dry' landform (with 5m thick engineered layers placed at the lowest part of the void starting at the southern end of the quarry, and raised to merge with adjoin floor levels in a south to north direction).

The application area comprises 33.64ha and it is advised that the site has remaining sand reserves within the currently permitted area of up to 150,000 tonnes. The total volume of restoration material to be imported is advised as being 2.7 million cubic metres (approx. 5.5 million tonnes) over a period of 8 – 10 years. The nature of the materials to be imported is advised to be approx. 700,000 tonnes per annum. The working hours for the sand and extraction and restoration works is carried out between 07:00 -18:00 Mon – Fri and 0:700 – 13:00 Saturdays.

It is advised that sand is excavated from the site and then processed to produce a range of products for use in the construction industry. The company operates under a lease from the landowners Wiston estate. It is advised that as the sand reserves at the quarry come to an end that both the applicants and the Estate are focusing their attention to the final restoration of the site.

It is advised that the current approved restoration would result in the quarry void being allowed to flood with ground water so creating a large and deep body of water which the applicants consider would be unsafe (as often attract the public and misadventure) and unsustainable. Furthermore, there are three (now closed) domestic waste landfill sites close to the quarry and as such it is

considered by the applicants that there is a possibility of significant contamination of the lake (and consequently of groundwater) by dissolved harmful and toxic substances produced from the landfill sites (known as leachate).

The applicants do not consider that the body of deep water (as currently permitted) would provide any significant ecological interest in the long term. However they consider that there would be greater ecologic benefits arising from the current proposals given the creation of a varied range of different habitats.

Various options have been considered as an alternative to the application, including the 'do nothing' approach, which is not a suitable alternative; the 'restore sooner' approach, which is considered inappropriate as would only allow the partial restoration to 'dry' whilst the remaining area would flood and would still be considered as dangerous; or the 'continue pumping' approach which would result in a landform that would not be in keeping with the surrounding landscape. Therefore, the applicants consider the proposed scheme to be the safest and most sustainable option.

The working hours for the sand and extraction and restoration works is carried out between 07:00 - 18:00 Mon – Fri and 0:700 – 13:00 Saturdays.

An Environmental Impact Assessment has been undertaken along with key environmental assessments and a summary of those effects in relation to Landscape and Visual Impact; Hydrology, hydrogeology, and flood risk; Ecological Impact Assessment; Ait quality Assessment and Dust Management Plan; Transport Statement; Archaeological Assessment and Heritage Statement; and Geology and Climate Change.

The Councils Environmental Health Department has been consulted and they have advised the following: (summary)

Having reviewed the Air Quality Assessment and Dust Management Plan Final Report (Southdowns Environmental Consultants, December 2020), Storrington AQMA is not included in the model. The report doesn't address the issue of traffic routing to avoid the Storrington AQMA. One mention of routing was made, which was proposed to ensure that the vehicles leave via the junction of The Hollow/A283 and head southbound towards the Washington Roundabout. This measure is indeed welcome as it would reduce air pollution impacts on the residential properties at the A24/The Hollow junction. Still, its implementation should be enforced, e.g. through the proposed GPS tracking for all the vehicles leaving the site.

It is expected that the model results carry high uncertainty as the model was verified with the monitoring sites on the A283, the latter having different traffic characteristics to the A24. In order to ensure better model accuracy it would have helped if the applicant had carried out short-term monitoring in the modelled area at locations adjacent to the A24.

Finally, the report does not make reference to the Air Quality and Emissions Mitigation Guidance for Sussex (2021) and no mitigation was proposed to reduce emissions from the additional traffic. The Sussex guidance takes a low-emission strategies' approach to avoiding cumulative impacts of new development, by seeking to mitigate or offset emissions from the additional traffic and buildings. Hence, applicants are required to submit a mitigation plan detailing measures to mitigate and/or offset the impacts and setting out itemised costing for each proposed measure, with the total estimated value of all the measures being equal to the total damage costs.

It is considered that subject to full consideration of potential residential amenity impacts and subject to consultation with, and consideration of WSCC own specialist officers advice, the District Council advise that in the event that a positive recommendation is made, and provided relevant conditions are imposed as before that HDC has no further comments to make on this application.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Emma Parkes', with a stylized flourish at the end.

Emma Parkes  
Head of Development