

**From:** [REDACTED]  
**To:** [PL Planning Applications](#)  
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**Attachments:** [REDACTED]

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## THE WIGGONHOLT ASSOCIATION

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West Sussex County Council  
Minerals Planning Department  
County Hall  
Chichester

16 August 202

**WSSC/028/21 ROCK COMMON QUARRY RH20 3DA: 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.**

1. This is an application
  - (a) to continue the winning of sand for which permission expired at the end of 2020 under WS/15/97 granted on 16 September 2004,
  - (b) to continue the importation of inert material,
 and
  - (c) to vary the 2004 restoration condition (see **WS/15/97**) which is to restore *“as a landscaped lake for associated amenity and conservation use in accordance with .. drawing R32/87.. in the interests of the amenities of the locality.”*
  
2. The inert restoration is set to take between 8 and 10 years, generating traffic movements assessed at “around 300 daily two-way movements”. The creation of a water landscape is likely to take significantly less time and significantly fewer traffic movements. Neither of these has been specified for comparison, presumably because they are sought to be varied.
  
3. The reason for proposing the change is that:
  - (a) deep water “can be extremely dangerous and indeed life-threatening should members of the local community be tempted to swim” etc.

(b) the new objective is to provide the ground for “an eco-lodge development set within the restored sand quarry”. This would comprise “visitor accommodation and recreational infrastructure” and would inevitably take substantially longer to create (subject to further planning permission) than the initial 8-10 year period of restoration.

(c) a National Park ‘destination’ outside but close to the South Downs National Park would create jobs and local spending.

**A. Sand extraction.** We understand that there are about 125,000 tonnes remaining. This is not a huge amount in terms of extraction time. There is a perceived requirement for this material, as witnessed by the recent Soft Sand Review of the Joint Minerals Local Plan which is even prepared to go into the National Park itself to recover amounts of soft sand of modest proportion. Timed extraction of the remaining sand at Rock Common is difficult to forecast and is not stated, but at the nearby Washington Sandpit it was envisaged that 84,000 tonnes could be extracted over a two-year period from 2016 to 2018 (see **WSCC/104/13/SR**). This time-frame was submitted in evidence to an outstanding application **WSCC/001/20** which bears similarity to the current application, though on a far smaller scale. It appears that the remaining sand at Rock Common could be extracted in much less than 4 years. If it is to be extracted simultaneously with the import of inert landfill, it could no doubt be extracted simultaneously with the original restoration feature. There would thus be an extraction/restoration period of probably less than four years. **We support the application to continue sand extraction because it is a useful resource; also because it can be carried out simultaneously with the water restoration over a considerably shorter period than the new proposal to restore with landfill.**

**B. Environmental considerations of transport:** It is normal in the industry for sand transport and inert waste transport to be carried out in separate operations. We have not seen a forecast of the number of vehicle movements which would be required by the export of sand, only those generated by inert waste (ie 300 daily 2-way – ie 600 - movements). Comparable movements connected with the nearby inert waste operations at Sandgate Park (**WSCC/044/18/SR** - permitted) and the Washington Sandpit (**WSCC/001/20** - no decision) are of the combined order of 48 (each way) movements per hour = 400 pw approx. over a maximum period of 11 years. **These movements**

**require to be aggregated with the movements in the current application in assessing its environmental and highway effects.** All will be routed via the designated lorry route, the A24. The intensive Rock Common movements over 8-10 years are thus revealed as a proposal with very serious environmental effects. **Also to these movements must be added sand extraction movements which are not available.** Movements of this intensity, even with load-covering, foretell an environmental crisis. We are told that they will have a negative effect on climate change and that “areas of new woodland planting” in the final landscaping are offered to mitigate this. Emissions of dust, and traffic fumes over 8-10 years are to be balanced by new amenity woodland. This suggestion appears cynical. Most importantly there are also traffic and health hazards for those living in the built-up areas close to the Quarry. The impact of this degree of traffic on the designated lorry route (A24) is not containable by a routing agreement ie it can only be routed via the A24 and there is no nearby rail head. The impact on the surrounding ‘A’ Roads would also be substantial as these form the final access to and from the site. (We have not seen a Highways report.) **We therefore object to this part of the variation proposal at the most basic level of environmental harm and harm to health and safety.**

**C. Current restoration scheme:** We understand that the original sand operation was by means of “wet-working” or dredging within the aquifer which was close to the land surface. Flooding and allowing the aquifer to find its natural level to form a lake as envisaged in the existing restoration conditions would avoid nearly all, if not all, the effects discussed above. We agree that water can be hazardous if not properly controlled and yet the new restoration proposals contain four substantial areas of landscaped lake. What of these? It is well-known that a small child can drown in a shallow garden pool. Mitigation measures against interaction with landfill are required for these lakes in the MPA’s scoping opinion of 2019 (para.4.28). Why not for the current lake restoration? Safeguards will obviously be needed for any area of water, but why is the original restoration deemed dangerous to members of the local community rather than all-comers? **We support the existing restoration scheme not because other restoration proposals are barred, but because of the huge environmental cost of achieving the new proposals, which do not exist – or, if they do, to a minimal extent - in the existing scheme.**

#### **D. Cumulative effect of restoration and its end plan via the proposed variation.**

The objective is to create an eco-lodge development set within the restored sand quarry; a [South Downs] National Park visitor destination and educational resource: an access point for a network of neighbouring estate experiences across the National Park; new visitor accommodation and recreational infrastructure. This is clearly going to be a very large development. Why is it set outside the National Park with its diminishing protection from development?<sup>1</sup> Anyone visiting American National Parks will readily understand that the 'National Park experience' is best met from within the Park itself rather than having to negotiate one of the busiest junctions of the Sussex road network. While this looks like a good idea on paper and is included in the Wiston Whole Estate Plan of 2017, we believe it is wishful thinking. The social and ecological disruption, the environmental and traffic hazards, and the contribution to climate change required to bring this long and deep working area of 33.64 hectares back to grade by the means proposed is too high a price for yet another habitation, however loftily styled as a "visitor destination". The Storrington area is already burgeoning with such proposals, the latest being the speculative development of mixed woodland and heathland at Rock Road/Heath Common. While such developments may create jobs and local spending, they also create excessive traffic and loss of greenfield land (minerals land is so classed). They certainly do not create communities. The population of Washington and the area east of Storrington/Sullington has tolerated sand extraction at Windmill Sandpit, Rock Common Sandpit, Washington Sandpit, Angells Sandpit, and the vast Sandgate Park at least since the 1920s. This list is not exhaustive and soon enough there will be a whole new area of sand extraction at The Chantry (nearby, and within the National Park) if it receives planning permission. Minerals extraction is a temporary land use (and popularly known as greenfield). Local people are told, "The land will come back". The local population has not undergone such a large industrial operation in its area for several lifetimes only now to suffer exponential lorry movements leading to yet another residential development. In 2009 a landfill application for Rock Common Quarry was refused on appeal. One of the reasons for refusal was that quarrying activities, and more recently simultaneous quarrying and landfilling activities in the area, "*had been tolerated by the local community for over 80 years with unacceptable cumulative impacts of development in the area on*

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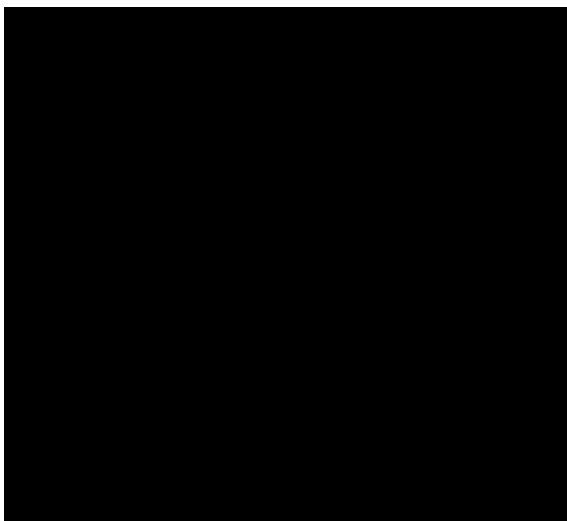
<sup>1</sup> The Buncton Manor Farm long-listed site, adjacent to Rock Common outside the Park, and a clear candidate for extraction, has recently been rejected on environmental grounds in favour of a nearby site within the Park (The Chantry).

*the social and economic well-being of the local community*<sup>2</sup> To this we must add extreme and harmful environmental effects, noting that it is the very same sandpit which is under consideration. **We object most strenuously to a development which will extend probably by 3 or 4 years the 8-10 already envisaged by landfill ie 14/15 years in total. The final restoration of Rock Common Quarry which is sought is to to a form of restoration which was never contemplated when the most recent planning permission was given and could be achieved in a fraction of the time.**

**TO SUMMARISE:**

- (i) **We SUPPORT** the extraction of remaining sand at Rock Common not at its recent sporadic pace but at a rate which will shorten as far as possible the time leading to the restoration of the pit. (A brisk time-frame should be imposed as a condition.)
- (ii) **We OBJECT** to the proposal to vary the restoration to hard landform by means of the importation of inert infill.
- (iii) **We OBJECT** to the proposed end-use (which we recognise will require separate consideration) as outlined in the present application and referenced to the **Wiston Whole Estate Plan**.

**E.** Please let us know the outcome of this application.



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<sup>2</sup> DC/401/07 (WS)