



# Sandgate Conservation Society

Registered Charity No. [REDACTED]

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Application Number: WSCC/028/21  
Location: Rock Common Quarry, The Hollow, Washington, Pulborough, RH20 3DA

## Description:

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 application is to:
  - a. permit the continued operation of the quarry in regards to sand extraction and the importation of materials for blending; and
  - b. to permit the importation and placement of suitable, inert classified engineering and restoration materials in order to create a "dry" restoration landform.
2. Sandgate Conservation Society **supports** the continued operation of the quarry in regards to sand extraction. While it is difficult to predict demand for soft sand, and considering the availability of soft sand in an area that already has three working sand quarries in close proximity, the Society would like to see extraction operations completed at the Rock Common Quarry in as short a timeframe as possible.
3. Sandgate Conservation Society **objects** to the importation and placement of suitable, inert classified engineering and restoration materials in order to create a "dry" restoration landform. The Society recognises that the amended restoration plan potentially could deliver benefits but the Society has significant concerns that the harms arising from this proposal will outweigh those benefits, and that without considerable care and oversight there is the real risk that the promised benefits will not be delivered in part or even in full.
4. The Society accepts that deep quarry lakes do present a particular danger to people who may ignore warning signs and prohibitions against swimming in them due to the risk of cold water shock and sudden depth changes, in addition to the other risks associated with swimming in any ponds, lakes, rivers and the sea, including the risks associated with blue/green algae in warmer water. The proposed restoration will not eliminate the dangers associated with outdoor, unsupervised swimming, and arguably with sandy beaches and shallower, warmer water may encourage unauthorised swimming.

Whichever restoration scheme is permitted there will still need to be measures taken to dissuade people from entering the water.

5. The planning application is partially based upon an assertion that under the current restoration plan there is a potential of leaching from the nearby household waste landfill sites. Given that approval of the current restoration scheme was given in 2004, when it is evident from the available documents on the planning portal that the possibility for pollution from the landfill under certain conditions was recognised, the Society would welcome some clarity on how, by whom and why it has now been assessed that conditions are such that the potential for pollution from the household waste sites now necessitates a change to the restoration plan.
6. It seems to the Society that the crucial point to avoid leachate entering groundwater is the maintenance of the water table below the base of the Windmill waste pit. The Committee Report related to the 2004 application places the responsibility for maintaining the ground water level below the Windmill waste pit not to be the responsibility of the applicant but of the owners of the landfill. It is not clear who the owner of the Windmill waste pit is.

Any approval must include a way of keeping groundwater below the base of the Windmill pit and the responsibility for this must be established if not already known.

7. Considering the likely disturbance due to the site being a working quarry it appears to support a large number of species such as several bat species, including some rare ones, dormice, reptiles and birds, including breeding peregrine falcons, sand martins and linnets. The Society accepts that a mosaic of habitats supports more biodiversity - the larger, more connected to other habitats and more varied the habitat the greater its value for wildlife - however the Environment Impact Assessment (EIA) indicates that the construction and post construction operation of the restored site could have significant negative ecological impacts. A summary of these impacts is given in the Planning and Environment Statement Vol. 2, Part 2 on page 57. A number of measures are described in Section 4 of the same document to avoid, mitigate and compensate for the identified impacts. The Society does not have the expertise to be able to comment on whether all of the negative ecological impacts have been correctly identified or whether the proposed measures are adequate but it does note that a number of the measures depend on being done in a carefully planned manner taking into account the species' life cycles e.g. not disturbing during the breeding or hibernation period. The Society is concerned that quarry operation priorities should not be permitted to override the required measures to avoid, mitigate and compensate for the ecological impacts without approval and, where feasible, additional conditions. Without adequate monitoring, management and accountability there would be a risk that actions will be taken that may threaten the existence of particular species at the site. Given that the site is surrounded on three sides by major roads and on the fourth side by farmland with a few connecting hedgerows it is doubtful that some, less mobile, species would be able to readily naturally recolonise the restored site from the surrounding landscape.
8. At paragraph 4.5.3 of the Planning and Environment Statement Vol 2 Part 2 it is stated that:

*"The loss of the sand cliffs used by nesting peregrines is unavoidable and cannot be mitigated for both the approved and proposed schemes, resulting in the permanent displacement of the breeding peregrine falcon pair. At this stage in the scheme design, it is assumed that the displaced peregrine pair will find alternative nesting sites elsewhere in the local landscape – for example at a nearby quarry site or an artificial structure."*

Given that the peregrine breeding records provided in the application indicate that in the local area, i.e. within around 2km of the quarry, only one other site has supported a breeding pair of peregrines in the last 5 years the Society would like to see some consideration given to the provision of an artificial nesting site or sites for the peregrine pair at the quarry site, or nearby, suitably located to avoid human disturbance during the restoration period and afterwards during the post construction operation period.

9. The planning application quotes the WSCC Monitoring Report (2019 - 2020) that there are no active inert waste landfill sites within the county. This seems inaccurate or out of date:
  - Britaniacrest is awaiting a decision on its application to vary conditions on planning application WSCC/009/18/SR to allow sand winning to continue until December 2021 and the importation of

inert material to continue and the restoration of the quarry to be completed by 1 May 2028 at the latest. Britaniacrest cite lack of availability of inert material as partially responsible for the need to extend the period allowed for the importation of inert material (though not the main reason). It should be noted that the application to vary conditions - WSCC/001/20 - was submitted before the start of the COVID-19 pandemic so lack of availability of material was not due to any slowdown of activity due to the pandemic. In application WSCC/001/20 the applicant estimated that between the years 2023-2024 79,434 tonnes of inert waste would need to be imported, and between 2025-2026 66,341 tonnes of inert waste would need to be imported. Continuing restoration activities are evident at the site even though the decision on the latest planning application is pending.

- CEMEX received permission, in January 2020 (WSCC/044/18/SR), for the importation of 1.8m tonnes of inert material over a period of 11 years for the restoration of the Sandgate Park Quarry. Given the condition that development should commence before the expiration of 3 years since permission was granted, barring any further application to vary conditions, the importation of material should commence before January 2023. The CEMEX application stated that it was proposed to import material at a rate of 250,000 to 350,000 tonnes per annum.

Given the above these two local sites are clearly active, or at least potentially active, inert waste reuse / landfill sites.

10. The Rock Common Quarry application states, as an indication of the need for inert material landfill sites, that in 2018/19 654,055 tonnes of inert waste in the county was managed by way of engineering projects including quarry restoration. If this figure reflects the current and predicted volume of inert material that annually needs to be disposed of by way of reuse in engineering projects it would imply that the proposed import of 700,000 tonnes per annum into the Rock Common Quarry alone would provide sufficient landfill capacity for the entire county let alone the existing capacity provided by the Washington Pit (for the period 2023-2026) and Sandgate Park Quarry (for the period roughly the same time as the Rock Common Quarry proposal), giving the potential prospect, should this application be approved, of inert material from all over the county, and possibly beyond, being transported to the Washington / Storrington area resulting in excessive transport miles, local traffic congestion, disturbance and pollution. In addition, excess capacity to reuse inert material would result in the restoration of quarry sites, in particular the quarry sites in the locality including Rock Common Quarry itself and Sandgate Park Quarry, being prolonged due to lack of availability of inert material thereby extending the period local people have to put up with the inconvenience, disturbance and pollution caused by quarry restorations.
11. The Society believes that as much construction, demolition and excavation waste as possible should be recycled as a new product, such as secondary aggregates to reduce the CO<sup>2</sup> emissions of the construction industry and into recycled soils to preserve a valuable resource. Should additional landfill capacity for inert waste be required the WSCC Monitoring Report (2019-2020) recognises that new proposals for inert material recovery tend to come forward to meet demand the 'capacity need'. It is therefore probable that alternative sites will become available which are better spread across the county and closer to the source of the waste material. The Society does not find the applicant's argument that the importation of inert landfill material into the Rock Common Quarry meets a county need to be compelling.

The Society requests that should the planning authority be inclined to permit the importation of inert material to the Rock Common Quarry that this should be postponed until the Sandgate Park Quarry restoration is nearing completion and it is clear that additional capacity for the reuse of inert material in engineering projects is required.

12. The application indicates that the delivery of unsuitable material is expected (between 1% & 2%) and would be turned away. It is the Society's expectation that any sorting of material should be carried out at the time and place of loading not on receipt as this would avoid the need for additional journeys associated with the import of enough restoration material, a longer restoration period, and additional road mileage associated with the transfer of unsuitable materials to other sites. The Society raised a similar concern in respect of the CEMEX Sandgate Park Quarry application to permit infilling and the following condition was subsequently included in the permission granted to CEMEX:

*'Only processing of only inert and uncontaminated restoration materials shall take place on site at any time throughout the duration of the development hereby permitted. No such inert restoration materials shall be exported off site, save for rejected inert restoration materials that are unsuitable for restoration. A record of reject loads shall be maintained by the applicant at all times and be kept at the site office at all times. They shall be made available to the Minerals Planning Authority upon request.'*

*Reason: To ensure the restoration of the site within agreed timescales, in the interests of the general amenities of the locality.'*

The Society asks that should this application be approved that the same condition is applied.

13. The proposal is that HGVs delivering inert material would enter the site via the A283 junction with The Hollow. Unlike for the sand HGVs no 'left in / left out' rule is proposed nor would be feasible, though drivers will be encouraged to approach from the west so that they turn left into The Hollow when arriving at the site. This would still mean that when exiting towards the west (i.e. heading towards the A24 north or south or the A283 westbound) they would still turn right out of The Hollow onto the A283 across the east-bound carriageway. Depending on time of day and traffic congestion it is also probable that some drivers approaching from the east would decide to turn right into The Hollow from the A283 rather than face the delay involved with turning at the busy Washington roundabout. So a significant number of the estimated 300 - 500 HGV movements per day are likely to involve a turning into or out of The Hollow across the A283. A review of road traffic incidents on the website crash.co.uk which uses government supplied data shows a cluster of incidents at or near the junction. In the last five years these incidents have been minor but over the past 21 years have included three serious incidents.

The Society believes that should this application be granted road safety measures should be implemented to slow down traffic and improve visibility around this junction and to warn other drivers of the presence of large turning vehicles.

14. The additional traffic arising from the import of inert material could create additional congestion at the Washington roundabout and tailbacks on all of the approaching roads causing increased air pollution and travel delays.
15. With regards to the AQMA in Storrington, should the application be granted, in whole or in part, it should be subject to the same constraints prohibiting HGVs routing through Storrington as are applied in relation to the other sand quarries in the vicinity of the village.
16. The additional disturbance, noise, dust, traffic etc is likely to have a detrimental impact on local businesses until the restoration is completed. As the restoration is planned to take several years this detrimental impact is likely to be significant to, and potentially threaten the viability of, local businesses, and therefore also harm the local economy.
17. The Society notes that only permissive access will be granted across the restored site and that there used to be a public footpath across the site but that was re-routed around the site in 1971. While access to public footpaths is protected by law the landowner may withdraw permissive access at any time. The Society feels that although the uncertainty of the permissive path is unwelcome the presence of the public footpath around the site makes this less of an issue. The restoration plan shows the permissive path will only provide public access to the area around the large pond in the north west of the site. The Society recognises the need to balance public access with its attending disturbance, dogs, littering etc with the need to manage the site for wildlife, however experience at other local sites suggests that it is likely that a significant number of the members of the public will stray from the designated path to explore the whole site unless there is a physical barrier preventing them. Unauthorised cycling and even sometimes horse-riding may also occur. Disturbance is also likely to occur due to the eventual use of the restored site as a destination for visitors to the South Downs National Park. The application suggests that this will include accommodation and educational facilities. It is assumed that other facilities would also need to be provided, such as car parking and facilities to support housekeeping and maintenance activities. The application gives no indication as to where these facilities are likely to be located and how extensive they may be.

Consideration should be given to how this problem may be addressed to prevent habitat degradation

and disturbance to wildlife e.g the sand martins and thereby result in the site failing to deliver the promised biodiversity benefits.

18. This application should be considered within the context of other major construction, quarrying and infilling operations ongoing, planned and likely within the immediate area, and the cumulative effect of these on the well-being of local residents in the area, particularly in Ashington, Washington and Storrington, on local businesses, the environment and wildlife e.g.:
- a) the likely permission to continue sand winning and import of restoration material to the Washington Pit at Hampers Lane;
  - b) the current permission to import 1.8m tonnes of inert material for the restoration of the Sandgate Park Quarry at Water Lane;
  - c) the identification in the Joint Minerals Plan of the Chantry Pit extension as a site suitable for future sand winning;
  - d) housing developments for which permission has been granted at the Thakeham Tiles site on Rock Road and at the field north of Downsview Avenue;
  - e) potential housing development at Ravenscroft Allotments (site identified for potential development in Storrington & Sullington and Washington Neighbourhood Plan (SSWNP)) - initial proposal submitted by A2Dominion;
  - f) other potential developments at sites identified in the SSWNP and Ashington Neighbourhood Plan;
  - g) potential housing developments at sites identified in the Horsham District Local Plan required to meet county targets for the delivery of housing; and
  - h) potential applications to extend infilling at existing local quarry sites.

