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PLANNING AND ENVIRONMENTAL STATEMENT  
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## PREAMBLE

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Dudman (Rock Common) Limited (a company within the Dudman Group of Companies) is the operating company at Rock Common Quarry ("the quarry", the site"), an active sand quarry within the County of West Sussex and within the District of Horsham. The quarry is situated approximately 350 metres to the north-east of the village of Washington whilst at its closest point the boundary of the South Downs National Park lies some 50 metres to the south of the site, immediately to the south of the A283.

Small scale sand extraction on the common was first recorded many centuries ago. Sand extraction intensified in the 1920's and the beginnings of the quarry which can be seen today started in the 1940's with planning permissions being progressively granted since 1953. Operations are currently regulated by Planning Permission Ref WS/15/97 issued by West Sussex County Council in September 2004 ("the 2004 Permission", "the current planning permission"). This permission was granted following a review of old mineral planning permissions as required under the relevant sections of the Environment Act 1995.

The area covered by the 2004 Permission extends to a total of some 32.71 hectares and includes land both to the north and the south of a Class C public road known as The Hollow (WSCC Ref 17600286). The main quarry lies to the south of The Hollow whilst a smaller area, which comprises the sand processing area, lies to the north of this public road. The application area proposed as part of this application extends to a slightly larger area of 33.64 hectares to include an additional area referred to as the "restoration materials reception area".

The existing processing area contains a range of plant and machinery of a type that would ordinarily be expected for a mineral operation of this nature. In addition to mineral processing the land to the north has planning permission for a ready-mixed concrete batching plant and for the importation and stockpiling of up to 5,000 tonnes of sand and peat per annum and up to 10,000 tonnes per annum of aggregate for blending.

Historically, the site has operated with sales of up to 300,000 tonnes per annum, but more recently sales have been significantly lower, averaging around 50,000 tonnes per annum.

This application is being submitted primarily to vary the currently approved restoration of the quarry. In brief, the proposal is to import and place suitable, inert restoration materials in order to create a "dry", restored landform. The imported material will be used to engineer and raise the level of the quarry floor to a point above that of the natural, groundwater level. This "dry" restoration will replace the currently approved restoration which is to create a body of deep water within the final excavated void. A number of issues can be identified associated with the approved "wet" restoration, the detail of which will be discussed elsewhere in this statement.

In addition to applying to amend the approved restoration of the quarry, the application also seeks to extend the time permitted for mineral extraction to allow all remaining reserves of sand to be worked and processed.

In summary, this Environmental Statement is provided in support of an application to enable the remaining sand reserves to be worked and for restoration material to be imported to allow a "dry", safe and sustainable landform to be created within the quarry void.

## SECTION 1

### *Introduction*

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#### 1.1 Context

Dudman (Rock Common) Limited ("the applicant") is the operator of Rock Common Quarry. Since taking a lease of the site from the Wiston Estate in 2011, sand from the quarry has continued to make a vital contribution to meeting the need for construction materials in the local and wider area.

The site comprises an existing, active sand quarry plus associated processing plant. The quarry lies to the south of the Class C public road known as The Hollow, whilst the processing and sales area lies to the north of the road. The mineral is dug from the sand beds and is screened within the quarry to remove over-size material. The remaining sand is then transported by conveyor to the processing area, passing beneath The Hollow via a small tunnel.

In order that the sand can be worked "dry" it is necessary for the groundwater level to be kept depressed. This is achieved by pumping the ground water from a sump situated in the floor of the quarry with the water being discharged (under licence) into the Honeybridge Stream or into the site's own freshwater lagoon (as appropriate).

Operations at the quarry are currently regulated by a planning permission granted in September 2004 (Ref WS/15/97). This permission was granted under the "review of old mineral permissions" procedure as specified in the Environment Act 1995. The review was a consolidation of five earlier permissions "*for the winning and working of sand at Washington Rock Common Sandpit*" and the 2004 Permission is subject to 33 planning conditions which cover a wide range of environmental and operational criteria. A copy of this current permission can be found appended at Appendix 0 to this statement (Volume 1).

It will be noted that Condition 2 of the 2004 Permission requires that "*all mineral extraction at the site shall cease on or before 31 December 2020*". An application was submitted under S73 of the Town and County Planning Act 1990 (as amended) on 18 December 2020 (via the government's Planning Portal) for approval to vary Condition 2 of the 2004 Permission to allow mineral extraction to continue until not later than 31 December 2022. A decision on this time-extension application has yet to be made.

#### 1.2 The Applicants

This application is being submitted jointly by the operator and landowner.

Dudman (Rock Common) Limited is a company within the Dudman Group of Companies. Originating as a haulage firm, the Dudman Group of Companies has grown and adapted into an independent group that supplies aggregates and ready-mixed concrete across the South coast operating out of depots across Sussex and Hampshire and using a haulage fleet of some 40 vehicles (including tippers, articulated vehicles, mixers and sweepers).

The Dudman Group of Companies operate and have interests in a number of quarries and satellite ready-mixed concrete plants across the region.

The Wiston Estate has been owned and managed by the Goring family since 1743. The Estate extends to almost 2,500 hectares (6,000 acres) across the chalky slopes of the South Downs and the flat clay soils of the Weald. The Estate lease land at Rock Common Quarry to Dudman (Rock Common) Limited.

This application has been managed on behalf of the applicants by Terrestria Limited an independent mineral and waste planning and development consultancy headed by Chartered Minerals Surveyor, Michael Metcalfe LLB (Hons) Dip Arb FRICS.

### 1.3 Validation of Planning Applications

The National Planning Policy Framework (June 2019) requires local planning authorities to publish a "local list" setting out their information requirements for planning applications, that is the information required for the submission of a valid planning application.

This Environmental Statement includes all of the National and Local validation requirements as set out in the tables found in the County Council's *Local List for the Validation of Planning Applications (June 2019)*. The Validation Requirements Checklist is provided at Appendix 1 to this statement (Volume 1).

### 1.4 The Planning Application

This planning application is for,

*The continued winning, working and processing of sand from the existing Rock Common Quarry, the continued importation of up to 10,000 tonnes of aggregates per annum and 5,000 tonnes per annum of soils and peat for blending, the continued use of permitted concrete batching plant, 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*

The application is intended to secure a new, full planning permission which will entirely replace the current 2004 Permission (and Planning Permission Refs DC/2151/07(W.S) and DC/554/05(W.S)) and so regulate the future extraction and final restoration of the quarry.

This application will take account of changes in circumstances at the quarry which have occurred over its long working life and include "best practice" for all aspects of the development and will provide for modern restoration practices, including sympathetic landscaping and the provision of increased biodiversity, so not only replacing but updating the current permission.

## 1.5 Environmental Statement Context

An Environmental Statement, as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("EIA Regulations 2017"), accompanies the planning application to enable the continued extraction and processing of sand at Rock Common Quarry and the subsequent restoration of the site with imported, inert restoration material.

Environmental Impact Assessment was first introduced into English law by regulations in 1988. The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 came into force in March 1999. The new regulations were one of the ways in which the European Commission Directive 98/11 (which amended Directive 85/337) was transposed into English law.

Over the course of time the regulations have been subject to review, the most recent of which being the EIA Regulations 2017, amended in order to take into account of changes brought about through case law.

The latest guidance on the preparation of Environmental Statements is articulated in the relevant central government Planning Practice Guidance.

**Because of the current COVID-19 pandemic, the requirement to comply with Government regulations and guidance, the need to prevent the spread of the virus and to ensure the safety of employees and the public the planning application and associated documents will only be available for public viewing on-line. Documents will be available to download so that these can be viewed "at leisure".**

**For full details on how to access and/or obtain copies of the application documents (including the Planning and Environmental Statement) please refer to the Non-Technical Summary or email [mick@terrestria.co.uk](mailto:mick@terrestria.co.uk)**

The Environmental Statement includes a Non Technical Summary, the purpose of which is to ensure that the findings of the studies undertaken can more readily be disseminated to the general public and that the conclusions are easily understood by non-experts as well as decision makers. The Non-Technical Summary reflects, in an accurate and balanced way, the key information contained in the Environmental Statement describing all conclusions and the facts and judgements on which they are based.

The aim of the Environmental Statement is to define the current situation at the application site and adjoining environs, across the appropriate technical disciplines, describe the scope of the application and assess the potential scope for impact and the need, where required, for mitigation measures.

Accordingly, and consistent with Schedule 4 of the EIA Regulations 2017 the main objectives of this Environmental Statement are,

- (a) to identify and describe the existing environmental status (or baseline scenario) of the application site
- (b) to describe the proposed changes sought having full consideration of the physical characteristics of the development, that is size, scale and duration of various elements of the scheme
- (c) to identify any significant environmental effects (including cumulative and interaction effects) of the proposed changes sought and, in the case of any effect which may be perceived to be significantly adverse, the measures which are proposed in order to avoid, prevent, reduce or if possible offset any identified environmental effects

The Environmental Statement additionally considers "alternatives" and a Non Technical Summary is provided.

#### *Screening*

The area covered by the current planning permission extends to a total of some 32.71 hectares. As previously mentioned, the application area is slightly larger, extending to 33.64 hectares.

Schedule 1 of the EIA Regulations 2017 sets out descriptions of development for which an Environmental Impact Assessment is mandatory. Paragraph 19 of Schedule 1 identifies quarries and opencast mining where the surface of the site exceeds 25 hectares as being EIA development for which an Environmental Impact Assessment is mandatory.

#### *Scoping*

In July 2019 a request for a scoping opinion was submitted to West Sussex County Council and a formal Scoping opinion was issued by the Council on 15 November 2019. A copy of the *Request for a Scoping Opinion* together with a copy of the *Scoping Opinion* is appended to this statement (Volume 1) at Appendix 2.

### **1.6 Assessment Methodology**

In accordance with the EIA Regulations 2017 (Schedule 4) the details of the methodologies to be employed in assessing the potential impact of the proposals can be found in the scoping opinion documents appended at Appendix 2.

### **1.7 Difficulties Encountered**

Consistent with Paragraph 6 of Schedule 4 of the EIA Regulations 2017 it is confirmed that there were no technical difficulties or lack of knowledge encountered in the preparation and submission of this application.

The specialist in-house knowledge and external, independent consultancy input has enabled the preparation of this application and accompanying Environmental Statement to be made in complete accordance with the pre-application advice offered by the mineral planning officers of West Sussex County Council and the subsequently issued Scoping Opinion.

## 1.8 Pre-Application Consultation

In view of the nature of the proposed development the applicants considered it important to consult with the planning authority in order to obtain feedback from its officers before starting on the detailed design and assessment of environmental impacts of the proposal.

Following a long period of informal discussions with planning officers regarding the approved restoration of the site and the issues associated with this scheme a formal Pre-Application Meeting was held on 13 June 2019. The focus of the discussion was "*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*".

Further to this meeting the initial views of the officers were as follows,

- The application would need to demonstrate that the development accords with Policy W8 of the West Sussex Waste Local Plan relating to "*recovery operations involving the depositing of inert waste to land*".
- The benefit of the proposed restoration over the approved restoration would need to be clearly demonstrated. The application would need to focus on the long term benefits and how impacts of the proposal would be minimised.
- The application would need to take due account of criterion (e) of Policy W8 of the West Sussex Waste Local Plan being that "*the amount of waste material to be used is no more than is necessary to deliver the benefits identified*".
- There would be resistance to any suggestion that the proposed development would result in the site being used, or being open to be used, as a base for the recycling of inert waste. The application would need to be clear and unequivocal that all imported material (apart from "rejects") would only be used for restoration of the quarry.
- The application should (where possible) use "plain English" to ensure that the submitted information is clear and can be understood by a wide audience.

On 1 July 2019, shortly after the Pre-Application Meeting, the applicants submitted a *Request for a Scoping Opinion*. The Council provided a formal *Scoping Opinion* on 15 November 2019. Copies of both of these documents are appended at Appendix 2.



## SECTION 2

### *Existing Situation*

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#### 2.1 Site Location, Description and Context

Rock Common Quarry is an active sand quarry within the County of West Sussex, within the District of Horsham. The quarry is situated approximately 350 metres to the north-east of the village of Washington. The boundary of the South Downs National Park lies (at its closest point) some 50 metres to the south of the site, immediately to the south of the A283. Chanctonbury Hill SSSI lies approximately 1 km to the south-east of the quarry.

The A283 (Shoreham to Milford Road) passes close to the southern boundary of the quarry, whilst the A24 (Worthing to Dorking Road) runs within 100 metres of the west boundary. A narrow, unclassified road (Class C) which connects the A283 and A24 and known as “The Hollow” runs along the north-east boundary of the quarry.

The sand processing plant area lies on the opposite (northern) side of The Hollow to that part of the site from which mineral is currently being extracted. All traffic accessing the quarry does so only via the junction of The Hollow and the A24; no quarry traffic is permitted to travel along The Hollow towards or from the A283.

To the east of the quarry and of The Hollow are three former landfill sites known as The Windmill, The Rock and The Rough which were land-filled with municipal waste. They are now all fully restored.

The north flowing Honeybridge Stream passes under the A283 at a point some 250 metres to the south of the quarry before turning in a north-westerly direction to then run along the western boundary of the site until it reaches the A24. Groundwater which is pumped from the quarry is discharged (under licence) into Honeybridge Stream.

The closest residential and commercial properties include,

- Washington Towers Caravan and Camping Park which lies immediately to the west of the quarry between it and the A283.
- Sandhill Farm, which lies adjacent to the western boundary between the quarry and the A24.
- Rock House Nurseries which lies adjacent to the junction of The Hollows and the A24, close to the northern end of the quarry.
- Green Barn Farm, a mixed business comprising meeting/conference rooms, on-site butchery, corporate events and activities and catering/BBQ's, which is situated adjacent to the eastern boundary of the quarry.

### *Public amenity*

Footpath 2701 travels northwards from the A283 before running around the western and northern boundaries of the Quarry to join The Hollow. Footpath 2604 continues north-east and east from The Hollow skirting around the processing and operations area before continuing generally northwards.

### *Heritage*

There are 3 Scheduled Monuments in the vicinity of the site, although all are over 1 km distant,

- A cross-dyke feature which is west of Chanctonbury Ring hillfort (List Entry No 1015115) which lies some 1.4 km south-east of the site boundary (south of the A283)
- A "bowl barrow" on Chanctonbury Hill some 200 metres west of Chanctonbury Ring hillfort (List Entry No 1015116) some 1.2 km south of the site boundary (south of the A283)
- A section of Roman Road (north of Rock) (List Entry No 1448051) around 1.2km north west of the site (west of the A24)

There are a number of listed buildings within 1 km of the quarry. There are 21 Grade II listed buildings to the south of the A283, the majority of which are in the village of Washington. One cluster lies some 350 metres south-west of the site boundary, with a second cluster some 630 metres from the same boundary. There is a small cluster of 4 Grade II Listed buildings some 360 metres to the north-west of the site, on the west side of the A24.

Of particular relevance because of their proximity to the quarry, are the following, Grade II Listed properties,

- Green Common Farmhouse, 260 metres from the southern boundary (south of A283)
- Sandhill Farmhouse, 80 metres from the western boundary
- Rock House, 170 metres from the northern boundary
- Rock Windmill, some 120 metres from the north-east boundary (north of The Hollow) but closer to the proposed imported material reception area (85 metres)
- Green Farmhouse, 30 metres from the eastern boundary

### *Statutory designations*

There are no statutory designated sites either within or in the vicinity of the quarry. However, the areas of woodland generally adjacent to the northern boundary, between it and A24, along the northern section of The Hollow and on the northern side of The Hollow, immediately south of the processing and operations area are classified as Priority Habitat Inventory-Deciduous Woodland.

## 2.2 Existing Operation

The existing operations extend over a total area of some 32.71 hectares. The active quarry area extends to around 27.19 hectares (south of The Hollow) whilst the processing area (north of The Hollow) covers an area of some 5.52 hectares.

The application area includes an area of additional land which will form the "restoration material reception area" (including access) together with a short length of internal access which links the proposed reception area with the existing sand processing area. The additional area is 0.93 hectares giving a total application area of 33.64 hectares.

Operations (both extraction and processing) within the existing quarry are relatively straightforward and are as would commonly be found for this type and scale of mineral operation.

### *Mineral extraction area*

The sand is won using a wheeled loading shovel. The "as dug" sand is taken from the working face to a feed hopper from which the sand is transported by a conveyor which passes the sand over a screen. All material that is greater than 5mm is screened out of the feed and stockpiled for future use as restoration material. The remaining sand (less than 5mm) is then transported by conveyor to the processing area on the north side of The Hollow. The electrically powered conveyor passes underneath The Hollow using a small tunnel.

The feed hopper and conveyors are not fixed but can be positioned around the working area so as to be close to the active, working face thus minimising travel by vehicles within the quarry (so reducing the potential for adverse noise and dust impacts).

The sand is worked dry which requires the natural groundwater to be depressed which is achieved by pumping the water out of the quarry. There is a single sump at the lowest point of the excavation and an electric pump is used which discharges into the Honeybridge Stream, which flows along the eastern edge of the quarry. The discharge is regulated by Licence. The natural recovery level of the groundwater is c 40 metres AOD.

In accordance with relevant Mines and Quarries legislation the site is securely fenced (predominately with post and barbed wire type fencing) and the entrances to both the extraction area and the processing area are gated and locked whilst the quarry is closed.

There are no public rights of way through the extraction area. The nearest right of way (Public Footpath No 2701) was diverted in 1971 and now runs along part of the western boundary of the site.

Overhead electricity lines pass along the perimeter of the mineral extraction area.

### *Sand processing area*

The sand processing area lies to the north of The Hollow. The current layout of this area is shown on Drawings DRCL/RCRA/WP-13 and DRCL/RCRA/WP-13A . As-dug sand is transported to the processing area by conveyor which passes via a tunnel underneath The Hollow.

The sand then passes through a sequence of screens and is either "washed" and "graded" in the washing plant or left dry for sale as a "dry-screen" product. Following processing the dirty water is pumped via a pipe to one of the silt settling lagoons situated in the mineral extraction area.

Stockpiles of finished sand products are stacked within the processing area and from these a wheeled loading shovel is used to load road-going vehicles for onward transport to the final end-user.

All vehicles enter and leave the processing area via a concrete access road which links with The Hollow. On exiting the processing area all vehicles are required to turn right only to travel north-westward along The Hollow to its junction with the A24, some 270 metres away.

In addition to the processing of the sand dug from the quarry, other activities are permitted within the processing area,

- Operation of a ready-mixed concrete batching plant (Planning Ref DC/2319/06 (WS))
- The importation and storage of up to 10,000 tonnes per annum of aggregates for blending and re-sale (Planning Ref DC/2151/07 (WS))
- The importation of up to 5,000 tonnes per annum of soils and peat for blending to create a growing medium (known as "root zone" or "top dressing") (Planning Ref DC/554/05 (WS))

The permissions to import material for blending are linked to the period permitted for sand extraction from the quarry. This submission includes applications to continue with the importation of material for blending (refer to Appendix 5).

The administrative offices, workshop, stores and employee welfare facilities are all located within the processing area. In addition there is a weighbridge and office and tanks for fuel storage.

Whilst historically sales from the quarry (via the processing area) have been as high as 300,000 tonnes per annum, recently the average has been much lower at around 50,000 tonnes per annum.

The average load is around 18.5 tonnes (although much smaller loads are often delivered locally). On this basis (and assuming 50,000 tonnes per annum) the average number of movements (inbound and outbound) would be 20 per day, or 112 per week. As regards the importation of material for blending, in most instances lorries bringing either aggregates or soil/peat would be the same as those subsequently exporting sand from the site, in which case there would not be any additional movements. Additional movements are likely to be less than 10 (inbound and outbound) per week.

### *Hours of operation*

Under Condition 6 of the 2004 Permission unless otherwise agreed in advance by the mineral planning authority (or in the event of an emergency) no operations (other than site dewatering, water pumping or environmental monitoring) is to be carried out other than between the following times,

0700 to 1800 Monday to Friday

0700 to 1300 on Saturday

No operations are to be undertaken on Sundays or Public and Bank Holidays

Maintenance of plant can be carried out on Saturdays between 1300 and 1800

## SECTION 3

### *The Application*

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#### 3.1 Overview

Rock Common Quarry has been active since the 1920's and has been the subject of many planning permissions granted for sand extraction since the 1950's. The quarry is currently working in accordance with a permission granted on 16 September 2004 (Ref WS/15/97) which was an application submitted by the then operator, Tarmac Limited, under the provisions of Environment Act 1995 requiring the review of "old mining permissions".

This application is being made firstly, to enable the recovery of the remaining reserves of sand and to allow the continued importation of materials for blending and secondly, to permit the importation and placement of suitable, inert classified engineering and restoration materials in order to change the approved restoration of the quarry and create a "dry", restored landform. This will be achieved by using the imported material to raise the level of the quarry floor to a level which will be above that of the natural, groundwater level. This will have a number of benefits,

- The current approved restoration is to create a body of deep water within the final excavated void (see approved "Concept Restoration Scheme" at Appendix 3 to this statement). This is described in the 2004 Permission application as being "*a landscaped lake with the associated quarry margins managed for amenity and nature conservation use*". The margins are to be graded generally to a slope of 50 degrees down to a level of 42 metres AOD at which level a flat bench is to be created before battering-down to the anticipated natural ground water level at 40 metres AOD. The underwater batters are to be graded at 20 degrees.

With sand extraction generally to a quarry floor level of some 10 metres AOD<sup>1</sup> (deepest area of extraction) this would result in a water body having a maximum depth of around 30 metres. Whilst the creation of deep bodies of water in quarries may have been acceptable at the time that the restoration was approved, restoring (and creating) large bodies of deep, open water with steep underwater slopes is no longer considered to be "best practice", not least because they are a danger to the public. An additional issue with deep water is that it does not provide suitable conditions for the creation of a wide and variable range of ecological interest. This proposal is designed to ensure that the quarry is restored to a safe, sustainable and ecologically varied landform.

- The quarry is in close proximity to the former Windmill, Rock and Rough Landfill Sites. Both the Windmill and Rock Landfill Sites were designed to operate on the "attenuate, dilute and disperse" principle. In other words, they were not lined with either clay or some other barrier the principle being to allow leachate (contaminated liquid) to flow from the waste deposit and to rely on the passage of the liquid through the adjoining undisturbed ground to "naturally" cleanse the leachate of contaminants.

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<sup>1</sup> The current planning permission WS/15/97 permits extraction to a maximum depth of 10 metres AOD (Condition 8)

The approved restoration scheme (that is the creation of a deep water body within the quarry void) is to be achieved by stopping the pumping of the groundwater from within the quarry and to allow the natural ground water level to recover to around 40 metres AOD.

The water levels within the Windmill Landfill Site are known to be higher than the recovered level of the natural groundwater. There is, therefore, significant potential for the southward flowing groundwater within the Folkestone Beds to pass through the putrescible waste deposited within the Windmill Landfill Site and flow into any water body created in the quarry. In other words, there would be a direct pathway for the passage of pollutants from the landfill site to pass into the restored water body (as currently approved) within the quarry and thereafter the possibility for any pollutants to spread wider afield within the groundwater. This application will provide a "dry" restored landform, created by raising levels within the quarry void using imported, inert restoration material so that the final restored levels are above the natural recovery level of the groundwater so removing the risk of pollution.

The Rough Landfill Site is an engineered, containment site.

By varying the approved restoration to one which provides for a "dry" restoration then this will provide a more productive and sustainable end-use of the restored land. It will be safer and will enable the restoration to provide for varied biodiversity across the whole site.

- The landowner, the Wiston Estate, in its *Whole Estate Plan 2017-2030* (which is endorsed by the South Downs National Park Authority) identifies the quarry as a site which "*can make a greater economic contribution*" and one which the Estate plans to "*regenerate as a vibrant, environmentally engaged tourism site offering a base for people to explore the National Park*". One of the stated outcomes for the Estate as a whole is "*the development of visitor accommodation and activities at Rock Common*" and to offer educational opportunities as part of the restored and re-developed site. The Estate's vision for the future of the quarry is for this to be "*an integrated ecological resource and National Park visitor destination co-located with ecotourist accommodation forming a gateway to explore woodland and downland centred experiences*".

The proposed restoration will be designed so as to create "development platforms" which will, on completion, provide the foundation for the future development of the site as envisaged in the Estate Plan. It is accepted that the long-term use of the restored land will need to be subject to consultation and a separate planning permission.

### 3.2 Detailed Proposals

This application is being made firstly, to enable the recovery of the remaining reserves of sand and to allow the continued importation of materials for blending and secondly, to permit the importation and placement of suitable, inert classified engineering and restoration materials in order to create a "dry" restoration landform.

Reference should be made to the suite of working, restoration and other drawings which are appended at Appendix 4 to this statement (Volume 1).

### *Sand extraction*

A description of the existing operation can be found in Section 2.2 above. Operations will continue in the manner described.

It is estimated that there are between 100,000 and 150,000 tonnes of sand reserves remaining within the quarry. These will be worked concurrent with the importation of material and restoration of the quarry.

As can be seen from Drawing DRCL/RCRA/WP-14 (which shows the approximate areas within the quarry where sand reserves remain) the remaining reserves occur in scattered pockets throughout the site. It should be remembered that Dudman (Rock Common) Limited took over working the quarry towards the end of its operational life, after the previous operator had effectively worked and processed much of the "easily won" reserves. Since this time the remaining sand reserves have had to be identified (by exploratory digging) as extraction has proceeded, with reserves often being covered by either the Marehill Clay, other on-site "waste" material or beneath current access roads. It is because of the ad hoc nature of the remaining reserves that it is not practical to look at a "phased extraction model" for extracting the remaining sand; as remaining pockets are discovered, then the sand will be extracted so maximising the available resource and ensuring no sand is sterilised.

Extraction of sand from the quarry is a relatively straightforward operation and the remaining reserves will be won in the same manner as has been on-going since the grant of the current 2004 Permission. This application does not involve changing the current, approved working method nor does it propose working other than to the limits specified in the current permission.

The sand processing plant and all associated stockpiles, offices, weighbridge, etc (as shown on Drawing DRCL/RCRA/WP-13) will remain in their current locations, in the processing area to the north of The Hollow.

Insofar as they remain relevant and continue to represent modern, "best practice" it is proposed that the conditions attached to the current planning permission will apply to the future winning, working, processing and treatment of the remaining sand reserves.

### *Restoration*

The restoration as currently approved is considered to be problematical in a number of ways as referred to above. Primarily this is because first of all it delivers a landform comprising of a large and very deep body of water with steep underwater slopes which would be unsafe and dangerous to the public and secondly there is significant potential for leachate (contaminated liquid) to pass from the adjacent closed landfill sites and pollute the restored water body and the groundwater.

In order to remedy these serious issues this application is being made to enable the importation of suitable, inert classified engineering and restoration materials which will be used to restore the quarry void to a level which would be above the recovery level of the natural ground water and so provide a "dry" restored landform. Drawing DRCL/RCRA/WP-11 (which can be found at Appendix 4 to this statement) shows the proposed final restored landform.



Restoration of the quarry to the landform shown will require the importation of a total of c 2,700,000 cubic metres of material. It is proposed that some 345,000 cubic metres of restoration material will be imported annually over a period of around 8 years.

The nature of the material to be imported (its density) will be variable and as such it is usual to express quantities as "cubic metres" rather than as "tonnes". However, if an average of 2.05 tonnes per cubic metre were assumed then this would translate to a little over 700,000 tonnes per annum.

Restoration material would be brought to the site by road using the existing access which served the former Windmill Landfill Site off The Hollow. Material would be off-loaded in an area just inside the entrance of the "restoration material reception area" ("RMRA", "reception area"). The layout of this area is shown on DRCL/RCRA/WP-02 and will include,

- Controlled, barrier access and egress (with cabin)
- Segregated reception bays (including a dedicated area for the temporary storage of unsuitable material, stored prior to removal off-site for disposal at an appropriately licensed facility)
- A mobile crusher and screen (for dealing with any material that might be suitable for producing recycled aggregate and which could be used for on-site roads and the like)
- A feed hopper/screen and conveyor unit for transporting restoration material to the quarry by way of a conveyor passing underneath The Hollow making use of an existing conveyor tunnel under the road
- Offices, welfare unit (with adjacent car and cycle parking)
- A wheel-wash and general vehicle cleaning facility
- An internal access road linking the reception area with the existing sand processing area

Vehicle access and movement within and around the RMRA will be strictly controlled. Personal employee and visitor vehicles will be segregated from lorries importing material. Each will have a dedicated entrance point with separate, internal access routes.

All vehicles loaded with restoration material will firstly be visually inspected as they enter the site to ensure that the material is acceptable. Any vehicles which may have unacceptable material as part of the load will be immediately turned away. That said, the likelihood of unacceptable material arriving at the site is very low given the detailed documentation and controls required under the appropriate Environment Agency procedures.

All acceptable loads will then be directed either to the "clean restoration materials bay" or to the "material reception bays". Material from the "clean restoration bay" will be directly transferred to the site via the conveyor which will pass underneath The Hollow using an existing tunnel. The conveyor will feed a radial conveyor (situated within the quarry) which will place material in temporary stockpiles ready for loading and transporting and placement.

Material temporarily placed in the "reception bays" will mainly comprise "mixed loads". These mixed loads will be "sorted" and segregated to ensure that material which requires further processing is kept separate from clean restoration material.

Any stockpiles in any of the bays will only be temporary. The aim will be to ensure that everything is cleared from the RMRA each day. In the event that stockpiles need to remain over-night then these would be a maximum of 3 metres in height.

Whilst the nature of the restoration material to be imported will be variable, it is estimated that only about 1% to 2% would need to be either turned away or would otherwise not be suitable for use as part of the restoration of the quarry and so need to be taken off-site and disposed of. Typical examples of unsuitable material for use in restoration would include timber, paper and cardboard which once separated could be sent for use as bio-fuel.

All vehicles will enter and exit the RMRA using the existing, gated access which links on to The Hollow and which was the main access serving the former Windmill Landfill Site. This access is some 122 metres from the junction of The Hollow with the A283. All vehicles importing restoration material to the site will only travel to the reception area via the A283 and this short length of The Hollow. All vehicles leaving the reception area will only be permitted to turn left out of the access and travel along The Hollow to its junction with the A283.

No vehicles will be permitted to travel along the length of The Hollow either to access the sand processing area or the A24.

The company's fleet of lorries are already fitted with modern, computerised GPS vehicle management system which allows the position of vehicles to be monitored in "real time" and logs produced for movements over time.

Drivers are given clear instructions regarding permitted routes and every driver is aware of the disciplinary action that would be taken in the case of any breach. In addition, CCTV cameras will be installed at the entrance to both the RMRA and the sand processing area with separate cameras located beyond the accesses to monitor vehicle movement and to prevent use of The Hollow as a short cut.

Operation of the RMRA and importation of restoration material will be limited to the same hours of operation as will apply to the sand extraction operation. Under the current planning permission these are,

0700 to 1800 Monday to Friday  
0700 to 1300 on Saturday

No operations on Sundays or Public and Bank Holidays

Maintenance of plant permitted on Saturdays between 1300 and 1800

Suitable restoration material will be transported to the main quarry area by conveyor which will pass underneath The Hollow via an existing tunnel. Material will be stockpiled on a dedicated "platform" before being taken by dump-truck into the void and placed.

The material will be placed in 5 metre thick, engineered layers. Material will be placed in the lowest part of the void first, at the southern end of the quarry. As levels are raised and as they begin to merge with adjoining, existing quarry floor levels then the "footprint" of the area of fill will increase (spread out). In this way, infilling will generally proceed south to north across the site. The void will be progressively restored similarly in a south to north direction.

Whether or not an engineered clay liner will be necessary prior to general infilling will be considered in consultation with the Environment Agency.

An important element of the scheme will be the creation of a sump connected to a "well" like construction. The "well" will be progressively raised from the existing floor of the quarry as the infill is placed and the levels are built up. This "well" will enable groundwater to continue to be pumped and discharged into the Honeybridge Stream so maintaining existing habitats and biodiversity.

The final restored landform is shown on Drawing No DRCL/RCRA/WP-11.

**Whilst reference should be made to the phased working and restoration drawings which accompany this application it should be noted that whilst every effort has been made to ensure that these accurately show the phasing and restoration of the quarry, for a development of this scale and nature a measure of flexibility is necessary to account for changing circumstances as the development proceeds. For example, whilst internal access roads are shown on the drawings, conditions on site may require these routes to be changed as the restoration proceeds.**

### *Landscaping*

The final landscaping of the site is considered in the report prepared by Lizard Landscape and Ecology to be found at Appendix AA in Volume 2. Part 1 of the Planning and Environmental Statement. Section 3.4 below provides a brief overview of the illustrative Landscape Masterplan, a copy of which is provided as part of the suite of plans appended at Appendix 4 to this volume of the Planning and Environmental Statement.

With reference to the Landscape Masterplan drawing (LLD1955-LAN-DWG-001) a suggested landscaping, planting and treatment of the restored landform is provided. This landscaping includes not only the main body of the quarry but also the sand processing area and the materials reception area both of which will be restored on completion of the restoration of the main quarry and once no longer required.

It should be noted that restoration of the sand processing area, whilst mainly including areas planted as acid grassland and native scrub planting will include the retention of a much reduced area of hardstanding. This will be used by the Wiston Estate following completion of the infilling and final restoration of the quarry, linked to the on-going maintenance of the site. It could also serve as parking for those wanting to make use of the permissive access being proposed across part of the restored quarry area.

### 3.3 Need

There is a continued need for the sand extracted at Rock Common Quarry. Whilst this proposal seeks to vary the restoration of the site, the remaining mineral reserves will continue be worked. The remaining reserves of sand, around 100,000 to 150,000 tonnes, will be extracted over a period of some 2 to 3 years.

The proposed change to the restoration will involve the importation of inert restoration material (as previously described). Placement of the fill material will be managed to ensure that all sand reserves will be worked and no sterilisation of mineral will occur. Restoration of the site is estimated to be completed within 8 to 10 years.

The need for the proposed change in the restoration of the site is twofold.

Firstly, and perhaps most importantly, there is a need to ensure a safe and sustainable restoration of Rock Common Quarry. This proposal will raise restoration levels to above the recovery level of the natural ground water and so ensure a "dry" restoration. This will replace the currently approved deep water body the design of which is inherently unsafe and which, because of the lake depth, would have minimal ecological interest. Providing a "dry" landform will remove the potential for water pollution from leachate from the adjoining, closed landfill sites.

The proposed restoration will provide a range of long-term landscape and visual, public access (by way of permissive paths) and nature conservation benefits for both the environment and the local community. The long-term afteruse of the site will be significantly more sustainable, safe and beneficial than the current approved scheme.

Secondly, the proposed restoration will be achieved using unwanted inert material. This will be sourced from construction projects looking to dispose of material rather than using primary land won resources. Whilst it is recognised that the proposed importation of restoration material could result in short term, adverse impacts these impacts have been assessed and this planning application is supported by a robust and comprehensive environmental impact assessment which considers the effects of the scheme. This assessment has enabled mitigation measures to be built into the design of the scheme and, where necessary, proposed mitigation measures that will need to be applied during the development. Overall it is considered that with mitigation there will be no significant adverse impacts either short term or long term for the community or environment. In the long-term, the revised restoration scheme will result in additional benefits to the community and environment.

This proposal to use inert materials to restore and shape the void created by sand extraction is regarded as a recovery operation rather than disposal of inert materials. In order to secure the proposed restoration scheme inert fill needs to be imported into the site. This inert material could be in the form of materials dug elsewhere, unwanted inert materials from construction and demolition projects or from infrastructure projects, all arising from activities such as constructing foundations, tunnelling, land shaping and the like.

It is not regarded as sustainable in economic, environmental or social terms to use primary soils or aggregates to create a restored landform. It is more sustainable to use unwanted inert construction materials and move them up the "waste hierarchy" and see them used to replace primary materials otherwise necessary to ensure a safe and sustainable restoration of the quarry void.

The most recent Monitoring Report confirms that there are no active inert landfill sites within the County. Inert waste that cannot be recycled is recovered through engineering projects such as quarry restoration, non-inert landfill cover, agricultural improvements, landscaping schemes and construction of noise bunds. In 2018/19 it was estimated that 654,055 tonnes of inert waste was managed in this way. The total amount of "recovery capacity" at that time was 3.24 million tonnes which was an increase from the previous monitoring year due to a permission at Sandgate Park for the continuation of working and mineral restoration involving the importation of 1.8 million tonnes of inert waste. If all sites operated at full capacity then the Report indicates that the remaining recovery capacity would run out by 2021/22 (Appendix C: Recovery Capacity in West Sussex). That said, the Report recognises that in reality new proposals generally come forward to meet demand. It is expected that if planning permission was granted for this proposal at Rock Common Quarry then the "recovery capacity" would be fully available from 2022 onwards.

### 3.4 Landscape Masterplan Strategy (Illustrative)

The consultant landscape architects, in close collaboration with the ecological consultants for the scheme, have produced a Landscape Masterplan ("LM"). The LM has been produced taking account of the constraints and opportunities developed within the Landscape and Visual Impact Assessment and defined through reference to planning policy, designations and landscape character.

**It is important to note that this strategy is illustrative and the expectation is that it may be modified in order to take account of comments received and further discussions to be had during the application process.**

The following two key objectives led the strategy,

- The need to provide a high quality mosaic of habitats across the site, and
- To provide a strong sense of place, accessed through a network of permissive footpaths with varied outlooks

The LM is in keeping with the heavily wooded ridges, interspersed with small patches of heathland, identified as characteristic for the West Sussex Storrington Woods and Heaths landscape character which surrounds the site to the north, whilst extending a mosaic of habitat into the Central Scarp Footslopes character found to the south.

The setting and recreational access to the South Downs National Park will be enhanced through establishing a multifunctional network of spaces and features which connect with surrounding and existing biodiversity corridors.

The detailed Landscape Masterplan together with a Landscape and Woodland Implementation and Long-Term Management Plan can be found at Appendix AA in Volume 2 (Part 1) of this Environmental Statement. In addition, a copy of the Landscape Masterplan is included within the suite of drawings to be found at Appendix 4 to this volume of the Planning and Environmental Statement.

## SECTION 4

### *Alternatives*

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#### 4.1 Introduction

The Planning Practice Guidance on Environmental Impact Assessment, the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 does not require an applicant to consider alternatives<sup>2</sup>.

Notwithstanding this, where alternatives have been considered, Schedule 4 (Part II) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 provides that the information for inclusion in Environmental Statements should include,

*A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects*

In accordance with Schedule 4 consideration of the main alternatives to the scheme are considered below. The assessment of alternatives has had regard to the environmental assessment work undertaken by the applicants' team of consultants and indicates where the assessment work has influenced the ultimate design of the scheme having regard to the potential for environmental effects.

#### 4.2 Approach

The assessment of alternatives has had regard to relevant Development Plan policies, planning guidance and the EIA Regulations 2017 together with its corresponding circular and good practice guide.

In terms of an overall approach it is considered to be neither practical nor necessary to look at every single alternative option. Instead, and in accordance with Government guidance, consideration of "main alternatives studied by the applicant" is undertaken below.

#### 4.3 The "Do Nothing" Option

The first consideration in terms of an alternatives assessment is the "do nothing option". In practical terms this would involve ceasing sand extraction on 31 December 2020 and thereafter restoring the quarry in accordance with the currently approved restoration scheme, essentially allowing the ground water to recover to its natural level so "flooding" the quarry void.

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<sup>2</sup> Paragraph 041 (Reference ID: 4-041-20170728) of the Planning Practice Guidance

This option would mean that,

- (a) the remaining reserves of sand would not be worked and therefore a valuable mineral resource would be lost;
- (b) the site would be restored in an unsafe and unsustainable way, that is the deep water body would be a danger to human health and would be devoid of ecological interest; and
- (c) there would be the potential for contamination of the water body (and so by implication the ground water) and surface water from leachate (contaminated liquid) originating from the former domestic landfill sites immediately to the east of the quarry

In light of the above significant consequences, the "do nothing" option is not considered to be an acceptable or satisfactory alternative.

#### 4.4 The "Restore Sooner" Option

It may be considered that the 8 to 10 year period necessary to ensure the restoration as proposed is too long a time for the local communities to be affected by traffic, noise and dust from the development and the visual impact of the development. A shorter timescale implies a reduced volume of restoration material being imported.

The proposed volume of restoration material is necessary in order to infill the quarry void and achieve a final restored level which is not only above the recovery level of the natural groundwater but also creates a landform which is sympathetic to the surrounding landscape. The recovery level of the groundwater is around 40 metres AOD. The majority of the site will be restored to a level slightly higher than this so ensuring sufficient "clearance" above the groundwater recovery level. The levels towards the northern end of the site are higher but this is to ensure a sustainable final landform and to blend the restored land into the adjoining, original ground levels.

To reduce the amount of material to be imported and used for restoration infill would mean that the final restored levels would be lower than the groundwater recovery level. This would lead to an unsatisfactory restoration of the site which would be liable to flooding and having uncontrolled standing water on the surface of the infill.

#### 4.5 The "Continue Pumping" Option

Another alternative would be to continue pumping in order to artificially depress the groundwater level and so keep the quarry void dry. Pumping in order to depress the groundwater level has been ongoing for many years, enabling the sand to be excavated by "dry working". If this option were to be pursued then the sides and floor of the quarry would need to be regraded and thereafter planted and seeded. At its deepest, the quarry is over 40 metres deep. Some of the high, sand faces are unstable and liable to weathering and so would need to be made safe but this would be difficult to achieve. To restore the site as a 40 metre deep "bowl" would create a landform that would not be in keeping with the surrounding landscape.

#### 4.6 Conclusions

The proposed infilling of the quarry to levels which are above the recovery level of the groundwater and so create a dry, restored landform which can be landscaped to produce a diverse range of habitats, which can provide informal access for the public (by way of permissive footpaths) and, most importantly, which will prevent the risk of contamination is the optimum alternative. The development as proposed is the best scheme both in terms of safety and sustainability and in providing wide ranging biodiversity and a final restored landscape that is entirely sympathetic with the quarry's surroundings.



## SECTION 5

### *Planning Statement*

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#### 5.1 The Development Plan and other material considerations

The development plan is at the heart of the planning system. It is a legal requirement that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. The development plan for an area is made up of a combination of strategic policies (which address the priorities for an area) and non-strategic policies (which deal with more detailed matters). Neighbourhood plans, when brought into force, become part of the statutory development plan for the area that they cover.

In respect of this application the development plan comprises the following,

- West Sussex Joint Minerals Local Plan (July 2018)
- West Sussex Waste Local plan (April 2014)
- Horsham District Planning Framework (November 2015)
- Storrington, Sullington and Washington Neighbourhood Plan (June 2019)

In addition, policies in the National Planning Policy Framework (February 2019), the National Planning Policy for Waste (October 2014), Planning Practice Guidance and the Wiston Whole Estate Plan are material considerations and will therefore be taken into account as part of the decision making process.

#### 5.2 Planning History

Small scale sand extraction on the common was first recorded many centuries ago. Sand extraction intensified in the 1920's and the beginnings of the quarry which can be seen today started in the late 1940's. Planning permission was first granted in 1947 to allow sand extraction to continue at part of the site (the processing area and the Rough landfill) under an Interim Development Order. Planning permissions were subsequently granted between 1953 and 1973 to allow sand extraction in the main pit area south of The Hollow.

Operations at the quarry are currently regulated by planning permission granted in September 2004 (Ref WS/15/97). This permission was granted under the "review of old mineral permissions" procedure as specified in the Environment Act 1995. The review was a consolidation of five earlier permissions "*for the winning and working of sand at Washington Rock Common Sandpit*" and the permission is subject to 33 planning conditions which cover a wide range of environmental and operational criteria. A copy of this permission can be found at Appendix 1 to this statement (Volume 1).

### 5.3 National Planning Policy Framework

The National Planning Policy Framework ("NPPF", "the Framework") was first published in March 2012. The Framework set out the Government's requirements for the planning system, reiterating the fact that planning law requires that all applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. The guidance superseded previously published planning policy statements, mineral policy statements and mineral planning guidance notes.

The NPPF was subject to review in July 2018 and again in February 2019. Following the significant revisions that took place in 2018, the amendments in the latest issue are, by comparison, relatively minor. Key amendments include the method to be used in assessing housing supply, changes to the method of housing and economic needs assessments and (perhaps of greater relevance as regards this application) Paragraph 177 has been amended such that the presumption in favour of sustainable development will not apply where *"the project is likely to have significant effect on a habitats site...unless an appropriate assessment has concluded that the...project will not adversely affect the integrity of the habitats site"*.

The Framework is to be read in conjunction with the Government's planning policy for waste.

At a national level, planning policy on minerals development is set out in Section 17 of the NPPF at Paragraph 203. This opening paragraph to the Section states that it is *"essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs"* and that since minerals are a *"finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation"*.

The Framework advises that in determining planning applications then *"great weight should be given to the benefits of mineral extraction, including to the economy"*(Paragraph 205).

That said, in considering proposals then mineral planning authorities must ensure that the development does not lead to unacceptable adverse impacts on the natural or historic environment or human health and that environmental impacts, such as noise and dust, are *"controlled, mitigated or removed at source"*.

The restoration (and aftercare) of sites are to be achieved at the *"earliest opportunity"* and must be carried out to *"high environmental standards"*.

This application has carefully considered the likely impacts of the proposed development and where these arise (and where these would be, without intervention and mitigation, “unacceptable”) appropriate mitigation measures have been provided and will be implemented as part of the overall development.

This application is mainly concerned with the appropriate restoration of the quarry which is close to the end of its working life. The footprint of the extraction area and the depth of working has meant that progressive restoration has not been a practical option. The “earliest opportunity” for restoration of this site is once all reserves have been won and that point has now arrived.

The final restoration of the quarry, as currently approved, does not achieve a “high environmental standard”. Simply to allow the groundwater to rise and fill the void, so creating a large, deep lake (up to 30 metres at the deepest point) would result in a dangerous and lifeless “landform”. This application will provide a landform which will offer a diverse range of beneficial after uses ensuring that the restored quarry provides a positive and sustainable contribution to the local area.

A key aim of the NPPF is to achieve sustainable development which is summarised as "*meeting the needs of the present without compromising the ability of future generations to meet their own needs*" (Paragraph 7).

The NPPF then goes on to refer to three, overarching objectives: economic, social and environmental objectives. Whilst these are not criteria against which every planning decision is to be judged, they nevertheless should "guide" development in order to deliver sustainable solutions.

The economic objective means building a "*strong, responsive and competitive economy*" whilst the social objective seeks to create "*strong, vibrant and healthy communities*". Finally, the environmental objective is about "*protecting and enhancing [the] natural, built and historic environment*" by making "*effective use of land...improving biodiversity, using natural resources prudently, minimising waste and pollution*".

At the heart of the Framework is a presumption in favour of sustainable development (Paragraph 11).

As regards planning applications this means that planning authorities must "*approve development proposals that accord with an up-to-date development plan, without delay*" (Paragraph 11(c)).

The development proposed in this application is sustainable.

In terms of the economic objective Rock Common Quarry is (and throughout its operating life to date, has been) the “right type” of land “available in the right place”. Minerals can only be worked where they occur and the sand which has been won over many decades from the quarry and used to create jobs, to build homes and to develop infrastructure has been in “the right place”. As mineral extraction comes to an end and the site enters the final restoration phase the land is ideally suited for the placing of material imported from other development sites where it would be surplus to requirements. By using this material to raise levels within the quarry void and restore to a landform that will itself be developed to create a wide range of beneficial after uses is sustainable.

This application carefully considers how the development could impact local communities and where there might be a negative affect on the health, social or cultural well-being of local communities then mitigation measures have been included.

As is detailed in this Environmental Statement, full and proper consideration has been given to protection of the environment, be that the natural, built or historic environment. A key driver of the proposal was to ensure that any risk of significant pollution resulting from the creation of a link between the former landfill sites and the groundwater was eliminated. Amending the currently approved restoration by creating a “dry” restored landform is the most appropriate way of dealing with the risk of pollution. An added benefit of changing the restoration from a deep body of water to a “dry” landform is that it will provide opportunities to create new habitats and so improve biodiversity.

As a sustainable development proposal then there is a presumption in favour of this application. In addition, and as will be evidenced elsewhere in this statement, this application accords with the up-to-date development plan and therefore the application should be approved without delay.

#### **5.4 National Planning Policy for Waste**

The Waste Management Plan for England sets out the Government’s ambition to work towards a more sustainable and efficient approach to resource use and management. National Planning Policy for Waste (“Policy for Waste”) sets out detailed waste planning policies. It should be read in conjunction with the National Planning Policy Framework.

The Policy for Waste provides guidance to local authorities for both when they come to preparing waste local plans and when determining planning applications.

When it comes to determining waste planning applications then authorities are required, amongst other things, to consider the likely impact on the local environment and amenity to include,

- protection of water quality and flood risk management
- landscape and visual impact
- nature conservation
- conserving the historic environment
- traffic and access
- air quality and dust
- noise
- ensuring that proposals are well designed so they contribute positively to the character and quality of the area in which they are located
- ensuring that sites are restored to beneficial after uses
- maximising reuse and/or recovery opportunities

As detailed elsewhere in this Environmental Statement this application has carefully assessed a range of potential impacts that the proposed development might have on the environment and/or amenity.

Unlike the restoration currently approved for the site, the proposed raising of levels within the quarry void and final “dry” restored landform will enable a range of beneficial afteruses to be implemented.

The restoration material will be imported from other development sites where the material would have been surplus to requirements. By re-using/recovering this material it will be used to benefit and enhance the final restoration of Rock Common Quarry.

## 5.5 West Sussex Joint Minerals Local Plan

The West Sussex Joint Minerals Local Plan ("the JMLP") was adopted on 20 July 2018 and is now the principal document for the determination of applications for mineral activities, both inside and outside of the National Park boundary. The JMLP covers the period to 2033 and sets out the vision and strategic objectives associated with minerals developments in West Sussex. It includes strategies for minerals planning and uses specific policies to deliver those strategies, together with generic development management policies against which proposals for minerals development will be assessed. The JMLP provides the basis for making consistent land-use planning decisions about such proposals.

As part of the statutory development plan for West Sussex unless material considerations indicate otherwise then planning applications must be determined in accordance with its policies.

This section will provide a commentary on how the proposal satisfies both the vision and the policies in the JMLP.

Repetition of the actual policy wording will be avoided wherever possible.

### Policy M2: Soft Sand

At the date of this application the most recent Local Aggregates Assessment was issued in May 2020. The shortfall of soft sand is identified as being between 1.74 million tonnes and 2.91 million tonnes depending on the assumptions made. The land bank, based on the highest demand forecast, is 6.2 years.

This proposal, insofar as it relates to the continued extraction of sand from the quarry, is an application for an extension in time, sufficient to enable the remaining reserves of sand to be fully extracted. The remaining reserves (estimated to be between 100,000 and 150,000 tonnes) will contribute towards the shortfall of soft sand identified in the Local Aggregates Assessment. The application therefore satisfies Policy M2.

### Policy M9: Safeguarding Minerals

The main thrust of the application is to vary the currently approved restoration of the quarry to enable a dry landform to be created. This will be achieved by importing suitable, inert restoration material which will be placed into the quarry void. Prior to restoration material being placed, all remaining sand will be extracted and processed via the existing plant.

The proposal includes for all remaining sand reserves to be won and processed. There will be no sterilisation of any of the currently permitted reserves. The application therefore satisfies Policy M9.

### Policy M12: Character

The two strategic objectives of this policy are, (1) the conservation and enhancement of the landscape and townscape character of West Sussex and (2) protection (and where possible the enhancement) of the natural and historic environment of West Sussex.

This Environmental Statement includes specific Chapters which deal with impacts of the proposed development on, amongst other things, landscape (including the special qualities of the South Downs National Park) and on the natural and historic environment.

Reference should be made to those Chapters which deal specifically with the impact of the proposal on what Policy 12 defines as “character”. The application concerns itself with the restoration of the quarry and ensures that the revised restoration will result in a safer and more sustainable and usable landform than that which is currently approved. There will be significant enhancement of both the landscape and the natural environment. This application therefore satisfies the policy requirements of Policy M12.

#### **Policy M14: Historic Environment**

The relevant strategic objective for this policy is the protection (and where possible, the enhancement) of the historic environment.

This Environmental Statement includes a specific Chapter which deals with impacts of the proposed development on the historic environment.

Reference should be made to the report at Appendix G in Volume 2 (Part 2) of this Statement which deals specifically with the impact of the proposal on the historic environment. The application concerns itself with the restoration of the quarry and ensures that the revised restoration will result in a more sustainable and usable landform than that which is currently approved. It is considered that following restoration the setting of those historic assets in the immediate vicinity of the site will benefit from the improved landform to be created. The historic environment will be conserved and enhanced. This application therefore satisfies the policy requirements of Policy M14.

#### **Policy M15: Air and Soil**

The relevant strategic objective for this policy is the protection (and where possible, the enhancement) of the natural and historic environment and resources of West Sussex.

This Environmental Statement includes a specific Chapter which deals with impacts of the proposed development on air quality. As regards soil, the quarry is opened out to its full extent and all soils that were present were stripped many decades ago. The original soils are stockpiled around the site and these will be used as part of the final restoration of the site (where suitable).

Reference should be made to the report at Appendix E in Volume 2 (Part 2) of this Statement which deals specifically with the impact of the proposal on air quality.

Soils that were previously stripped from the site in advance of quarrying have been stockpiled and will be used as part of the final restoration.

The proposed placement of imported material and the raising of levels will provide support to the quarry faces and so ensure the future stability of the adjoining land.

This application satisfies the policy requirements of Policy M15.

### Policy M16: Water Resources

The relevant strategic objective for this policy is to minimise the risk to people and property from flooding, to safeguard water resources (including aquifers) from contamination and to ensure that the quality and quantity of the water environment is conserved and enhanced.

The report at Appendix D in Volume 2 (Part 1) of this Statement deals in detail with the impacts of the proposed development on water resources.

One of the key drivers behind this application is the need to protect the water resource from becoming contaminated by pollutants originating from the former landfill sites lying to the north-east of the quarry. The currently approved restoration of the quarry proposes that the natural groundwater (which is currently being artificially depressed) should be allowed to recover and so flood the quarry void. The likelihood in doing this is that there would be significant potential for a pathway to be opened between the former landfill sites, the proposed restored body of water and thereafter beyond the site along which leachate would be able to be pass and so contaminate the water resource, both groundwater and surface water. The restoration proposed in this application will protect the water resource from contamination. Water quality will be preserved

This application satisfies the policy requirements of Policy M16.

### Policy M17: Biodiversity and Geodiversity

The relevant strategic objective for this policy is to protect and (where possible enhance) the natural and historic environment and resources of the County.

Comprehensive and detailed surveys have been undertaken at the site during 2020 in order to establish the presence (or otherwise) of wildlife species and habitats. The results of these surveys can be found at Appendix C in Volume 2 (Part 2) of this Environmental Statement along with conclusions regarding the nature of any impact brought about by the proposed development and (where appropriate) what mitigation measures might need to be employed.

Section 7 of this Environmental Statement (Volume 1) considers the impact of restoring the quarry on features of geological conservation importance, recognising that Rock Common Quarry is a designated "Regionally Important Geological and Geomorphological Site" (RIGS) (Sussex Ref No TQ11/41). It is noted that Policy M17 provides for a balance to be made between unacceptable impact on the site of importance and the benefits of the proposed development. It is considered that the benefit of ensuring that ground and surface waters are not exposed to contamination from contamination originating from the former landfill sites immediately adjacent to the eastern boundary of the quarry outweighs the impact of the proposal on the RIGS.



### **Policy M18: Public Health and Amenity**

The relevant strategic objective for this policy is to protect and (where possible enhance) the health and amenity of residents, businesses and visitors.

The reports at Appendices D and E in Volume 2 (Part 2) of this Statement assess the impact on public health and amenity brought about by (amongst other things) noise and air quality (including impacts associated with traffic) associated with the proposed development.

No Public Rights of Way will need to be re-routed as a result of the development and the enjoyment of existing footpaths is considered as part of the Landscape and Visual Assessment at Appendix A in Volume 2 (Part 1) of this Statement.

One of the key drivers of the proposal is to ensure a safe restoration of the quarry. The currently approved scheme is to allow the natural groundwater levels to recover so causing the quarry void to flood and create a water body up to 30 metres in depth. Experience has shown that lakes within quarries attract children and younger adults, especially during warm weather and sadly too often this can lead to fatalities. The proposed dry landform which is proposed will ensure that the health and well-being of residents and visitors will be protected.

This application satisfies the policy requirements of Policy M18.

### **Policy M19: Flood Risk Management**

The relevant strategic objective for this policy is to minimise the risk to people and property of flooding. In addition, a second strategic objective is to minimise carbon emissions and to adapt to (and to mitigate the potential adverse impacts of) climate change.

This Environmental Statement considers flood management as part of the assessment of hydrological and hydrogeological impacts (Appendix B, Volume 2, Part 1). Due account has been taken of the effects of climate change in this assessment.

### **Policy M20: Transport**

The relevant strategic objective for this policy is to maximise the use of rail and water transport for the movement of minerals. In addition, a second strategic objective is to minimise carbon emissions and to adapt to (and to mitigate the potential adverse impacts of) climate change.

The policy states that “*where practicable and viable*” then rail and/or water should be used for the transportation of materials to and from the site. Rock Common Quarry is not connected to a railhead and the nearest railway is over 11 km (7 miles) away at Pulborough. It would neither be practicable nor viable to access the site directly by rail. There are no navigable waterways within 16 km (10 miles) of the quarry (the nearest being the Wey and Arun Canal and the River Arun).

Appendix F in Volume 2 (Part 2) of this Statement considers in detail the impact of road vehicles associated with the proposed development in terms of capacity, safety and vehicle turning, manoeuvring, loading and wheel cleaning.

### Policy M22: Cumulative Impact

The proposal is, in the first part, to extend the period over which sand extraction can take place in order that all remaining reserves can be won from the site. The second element of the application is concerned with the safe and sustainable restoration of the quarry. Whilst there will be a short period when sand extraction will be occurring at the same time as the site is being restored it is not considered that this period of “*intensification of use*” will lead to an “*unreasonable level of disturbance*” as the detailed assessments included with this Statement demonstrate.

There are two sites some 2km to the west of the quarry, one an active sand quarry and both of which are undergoing restoration using imported inert material. The potential for cumulative effects is considered in Section 8 of this Environmental Statement.

Mention should be made of the possibility of the development of a new, soft sand site (known as Ham Farm) which is situated some 3 km (2 miles) east of the site, alongside the A283 near Steyning. If this new, greenfield site is developed then the intention is that it will “follow on” from the sand extraction at Rock Common Quarry. It should be noted that the Ham Farm site does not have planning consent and that cumulative impacts will need to be considered as part of any application to develop this site.

### Policy M23: Design and Operation of Mineral Developments

The strategic objectives for this policy are (amongst other things) to protect the health and amenity of residents and visitors, to conserve the landscape of West Sussex and the special qualities of the National Park, to protect the natural and historic environment of the County and to minimise carbon emissions.

The detail of the proposed development as found in this Environmental Statement will demonstrate that the requirements of this policy have been properly considered and due regard has been had to the strategic objectives of the Local Plan.

The site is currently an operational sand quarry working in accordance with a modern, reviewed planning permission. The key element of this application is to ensure that now the quarry is nearing the end of its operational life the site is safely and sustainably restored in a way which not only protects the ground and surface waters from potential contamination but is undertaken in a way which is sympathetic to the character and special qualities of the site's surroundings and that following restoration the site will make a positive contribution to the local environment.

#### **Policy M24: Restoration and Aftercare**

A key driver of this application is the safe and sustainable restoration of the quarry as sand extraction nears completion. As detailed elsewhere in this statement, the application is accompanied by a comprehensive restoration scheme which (amongst other things) makes provision for high quality restoration, includes habitat creation and the provision of public amenity benefits, will see the removal of plant and machinery associated with both the processing of the sand and the treatment of imported restoration material and will prevent contamination of ground and surface waters.

## **5.6 West Sussex Waste Local Plan**

The West Sussex Waste Local Plan ("the WLP") was adopted by both the County Council and the South Downs National Park Authority in April and March 2014. The WLP covers the period to 2031 and sets out the vision and strategic objectives associated with waste developments in West Sussex. It includes strategies for waste planning and use specific policies to deliver those strategies, together with generic development management policies against which proposals for waste development will be assessed. The WLP provides the basis for making consistent land-use planning decisions about such proposals.

As part of the statutory development plan for West Sussex unless material considerations indicate otherwise then planning applications must be determined in accordance with its policies.

This section will provide a commentary on how the proposal satisfies both the vision and the policies in the WLP.

Repetition of the actual policy wording will be avoided wherever possible.

### Policy W1: Need for Waste Management Facilities

The key strategic objectives for this policy include the requirement to maintain self sufficiency in managing, recycling and treating waste generated in the County and to work towards a declining amount of landfill over the plan period.

This proposal does not involve the disposal of non-inert waste. This application is about the recovery of carefully selected inert material so that the recovered material serves a “useful purpose” by being used to fulfil a particular function (Waste Framework Directive 2008), in this case the safe and sustainable restoration of Rock Common Quarry.

The safe and sustainable restoration of the quarry can only be achieved by raising levels within the quarry void to ensure that there is no hydraulic link between the natural groundwater and the former, household refuse landfill sites which lie immediately adjacent to the eastern boundary of the site. In order to raise levels and secure a dry restored landform then this application proposes the importation of carefully selected inert material which will be placed in engineered layers so providing a safe and sustainable landform.

This application is not an application for the disposal of waste but an application to use recovered inert material necessary to restore Rock Common Quarry.

### Policy W3: Need for Waste Management Facilities

The proposal is to “build” a facility to enable the recovery of material for use in the restoration of the quarry. The recovered material will only be used for raising levels within Rock Common Quarry and so will serve this “local” need. Given the end-use of the material the facility can only be provided either within, or in this case, immediately adjacent to the site that will benefit from the recovered material.

The facility will be located on an area of previous operational land associated with the former Windmill Landfill Site. Access to and from the facility will be via the former access to the landfill site which has been retained. This lies some 122 metres from the A283, a “Strategic Lorry Route”, which has onward connections to other strategic routes together providing good access across the County.

The proposed facility is well-located to receive suitable restoration material from development sites within the County and, being adjacent to the quarry which is directly connected via an existing conveyor tunnel passing underneath The Hollow, ideally situated to use the material to restore the quarry.

#### Policy W4: Inert Waste Recycling

The facility is located in accordance with the requirements of Policy W3 and is also accommodated within a former landfill site immediately adjacent to a permitted sand quarry the latter being the site which will benefit from the material to be recovered at the facility.

Access to the proposed facility is only some 122 metres from the A283 which is part of the Lorry Route Network.

#### Policy W8: Recovery Operations involving the Depositing of Inert Waste to Land

Pursuant to the Waste Framework Directive 2008 (the Framework), waste recovery is "*any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function*". Effectively, waste recovery preserves resources through the use of waste in place of other raw materials. Waste disposal on the other hand is defined as "*any operation which is not recovery, even where the operation has as a secondary consequence the reclamation of substances or energy*".

Waste recovery operations are about using waste to replace other non-waste materials to achieve a beneficial outcome in an environmentally sound manner. A recovery approach will preserve virgin materials which may otherwise be used, thereby conserving natural resources.

The Environment Agency initially based its decision-making on waste recovery to land through five tests detailed in Guidance RGN13 "Defining Waste Recovery: Permanent Deposit of Waste on Land"

- Is there a clear benefit from the activity?
- Is the recovered waste material suitable for its intended use?
- Is the minimum amount of waste being used to achieve the intended benefit?
- Is the waste being used as a substitute for a non-waste material? Will the proposal be completed to an appropriate standard?

In October 2016 the Agency released new guidance, "Waste recovery plans and permits" which focuses on the "substitution test". The guidance provides three tests,

1. Evidence of financial gain by using non-waste materials
2. Evidence that funding has been secured to cover the expected cost of the work using non-waste, or
3. Evidence that there is an obligation to do the work, for example being required by a planning condition to restore the land according to an approved plan

At the time of applying for a permit then the case for recovery will be presented to the Agency by means of a "Waste Recovery Plan" in which the applicant, amongst other things, will demonstrate that at least one of the substitution tests are met.

This proposal involves the use of appropriate material suitable for the safe and sustainable restoration of the quarry. The raising of levels in order to ensure a "dry" restoration will be undertaken using the minimum volume of material. A "dry" restoration will provide clear benefits through ensuring a safe landform (that is, by no longer restoring to a deep body of water) and providing opportunities to create a diverse range of habitats and increased biodiversity. The "obligation" will arise (the third substitution test) in the event that planning permission is granted for the proposal, accepting the need to vary and significantly improve the currently approved restoration scheme.

The proposal, which involves using recovered inert material to raise levels in the Rock Common Quarry void so as to provide a dry, restored landform, results in clear benefits not only for the site but for the wider area. As has been stated elsewhere in this statement, the currently permitted restoration of the quarry is inappropriate both in terms of safety and sustainability. The approved restoration which provides for the creation of a deep body of water could potentially provide a pathway for contaminated liquids to pass from the former domestic refuse landfill sites (which are situated on the eastern boundary of the quarry) into the restored body of water and beyond into the ground and/or surface waters. The deep body of water itself poses a serious threat to human life. Deep bodies of water are generally devoid of ecological interest. The proposed restoration will eliminate any risk of contamination and will provide a landform which will benefit both the local population (by providing a network of informal, permissive footpaths) and enable the creation of a diverse variety of habitats.

The only material to be used to infill the quarry will be suitable, inert recovered material. Only suitable inert material can be used to achieve the proposed restoration.

The quantity of material required has been carefully assessed and no more than this amount will be used or imported to the site. On completion of the restoration all plant and machinery will be removed and the site of the materials reception facility restored.

As this statement demonstrates, there will be no unacceptable impact on either natural resources or other environmental constraints. No mineral reserves will be sterilised and restoration will be to the highest quality standards.

Policy W8 states that proposals for recovery operations involving the depositing of inert waste to land will be permitted provided that those “tests” set-out in the policy are met. Measures detailing how these “tests” will be satisfied are integrated within this application as a whole. The following references deal specifically with the policy “tests”.

The proposal results in clear benefits for the site and, where possible, the wider area

Refer to Planning and Environmental Statement Volume 1 Section 3 and Volume 2, Part 1, Appendices A and AA

The material to be used is only residual waste following recycling and/or recovery or it is a waste that cannot be recycled or treated

Refer to Planning and Environmental Statement Volume 1 Section 3.2 and Section 5.6 (Policy W8)

There is a genuine need to use the waste material as a substitute for a non-waste material that would otherwise have to be used

Refer to Planning and Environmental Statement Volume 1 Section 3.2 and Section 5.6 (Policy W8)

The material to be reused is suitable for its intended use

Refer to Planning and Environmental Statement Volume 1 Section 5.6 (Policy W8) together with Volume 2 Part 1 Appendix B

The amount of waste material to be used is no more than is necessary to deliver the benefits identified

Refer to Planning and Environmental Statement Volume 1 Section 3, Section 4 and Section 5.6 (Policy W8)

There would be no unacceptable impact on natural resources and other environmental constraints

Refer to Planning and Environmental Statement Volume 1 Section 6 plus the full technical assessments found in Volume 2 Parts 1 and 2 (in particular Appendices A, AA and B)

The proposal accords with Policy W13 (Protected Landscapes)

Refer to Planning and Environmental Statement Volume 2 Part 1, Appendix A

Any important mineral reserves would not be sterilised

Refer to Planning and Environmental Statement Volume 1 Section 3.2

Restoration of the site to a high quality standard would take place in accordance with Policy W20

Refer to Planning and Environmental Statement Volume 2 Part 1, Appendices A and AA

#### **Policy W9: Disposal of Waste to Land**

As indicated in the commentary to Policy W8 above, the proposal involves the recovery of inert material and will not result in unacceptable impacts on natural resources or other environmental constraints. As regards groundwater quality, this proposal is driven by the need to ensure that the quality of the groundwater is maintained by preventing the potential for contamination.

No mineral reserves will be sterilised by the proposal. The remaining reserves within the quarry will be extracted in advance of infilling.

Only inert material will be used to restore the site, there will be no issues associated with landfill gas.

As demonstrated elsewhere in this application, restoration will be of a high quality.

#### **Policy W11: Character**

Reference should be made to those Sections which deal specifically with the impact of the proposal on what Policy W12 defines as “character”. The application concerns itself with the restoration of the quarry and ensures that the revised restoration will result in a more sustainable and usable landform than that which is currently approved. There will be significant enhancement of both the landscape and the natural environment.

#### **Policy W12: High Quality Developments**

Reference should be made to those Sections which deal specifically with the scale, form, design and landscaping elements of the proposed development. The application concerns itself with the restoration of the quarry and ensures that the revised restoration will result in a more sustainable and usable landform than that which is currently approved. There will be significant enhancement of both the landscape and the natural environment.



#### **Policy W14: Biodiversity and Geodiversity**

Comprehensive and detailed surveys have been undertaken at the site during 2020 in order to establish the presence (or otherwise) of wildlife species and habitats. The results of these surveys can be found in Appendix C in Volume 2 (Part 2) of this Environmental Statement along with conclusions regarding the nature of any impact brought about by the proposed development and (where appropriate) what mitigation measures might need to be employed.

Section 7 of this statement (Volume 1) considers the impact of the proposed development on the RIGS. It is noted that Policy W14 provides for a balance to be made between unacceptable impact on the site of importance and the benefits of the proposed development. It is considered that the benefit of ensuring that ground and surface waters are not exposed to contamination from leachate originating from the former landfill sites immediately adjacent to the eastern boundary of the quarry outweighs the impact on the RIGS.

#### **Policy W15: Historic Environment**

Reference should be made to the report at Appendix G in Volume 2 (Part 2) of this statement which deals specifically with the impact of the proposal on the historic environment. The application concerns itself with the restoration of Rock Common Quarry and ensures that the revised restoration will result in a more sustainable and usable landform than that which is currently approved. It is considered that following restoration the setting of those historic assets in the immediate vicinity of the site will benefit from the improved landform to be created. The historic environment will be conserved and enhanced.

### Policy W16: Air, Soil and Water

Reference should be made to Appendix E in Volume 2 (Part 2) of this statement which deals specifically with the impact of the proposal on air quality.

Soils that were previously stripped from the site in advance of quarrying have been stockpiled and will be used within the final restoration.

The proposed placement of imported material and the raising of levels will provide support to the quarry faces and so ensure the future stability of the adjoining land.

One of the key drivers behind this application is the need to protect the water resource from becoming contaminated by pollutants originating from the former landfill sites lying to the east of the quarry. The currently approved restoration of the quarry proposes that the natural groundwater (which is currently being artificially depressed) should be allowed to recover and so flood the quarry void. The likelihood is that this would result in opening up a pathway between the former landfill sites, the proposed restored body of water and thereafter beyond the site along which leachate would be able to pass and so contaminate the water resource, both groundwater and surface water. The restoration proposed in this application will protect the water resource from contamination. Water quality will be preserved

### Policy W17: Flooding

This Environmental Statement considers flood management as part of the assessment of hydrological and hydrogeological impacts (Appendix B in Volume 2 (Part 1)). Due account has been taken of the effects of climate change in this assessment.

### Policy W18: Transport

The policy states that “*where practicable and viable*” then rail and/or water should be used for the transportation of materials to and from the site. Rock Common Quarry is not connected to a railhead and the nearest railway is over 11 km (7 miles) away at Pulborough. It would neither be practicable nor viable to access the site directly by rail. There are no navigable waterways within 16 km (10 miles) of the quarry (the closest being the Wey and Arun Canal and the River Arun).

The assessment at Appendix F in Volume 2 (Part 2) of this Statement considers in detail the impact of road vehicles associated with the proposed development in terms of capacity, safety and vehicle turning, manoeuvring, loading and wheel cleaning.

### Policy W19: Public Health and Amenity

Appendices D and E in Volume 2 (Part 2) of this Environmental Statement assess the impact on public health and amenity brought about by (amongst other things) noise and air quality (including impacts associated with traffic) associated with the proposed development.

No Public Rights of Way will need to be re-routed as a result of the development and the enjoyment of existing footpaths is considered as part of the Landscape and Visual Assessment which can be found at Appendix A in Volume 2 (Part 1).

One of the key drivers of the proposal is to ensure a safe restoration of the quarry. The currently approved scheme is to allow the natural groundwater levels to recover so causing the quarry void to flood and create a water body up to 30 metres in depth. Experience has shown that lakes within quarries attract children and younger adults, especially during warm weather and sadly too often this can lead to fatalities. The proposed dry landform which is proposed will ensure that the health and well-being of residents and visitors will be protected.

It is common practice for liaison groups to be established as a conduit for local communities to raise issues. The applicant is prepared to agree a suitable planning condition to govern the creation of such a group to oversee the proposed development.

### Policy W20: Restoration and Aftercare

A key driver of this application is the safe and sustainable restoration of the quarry as sand extraction nears completion. As detailed elsewhere in this statement the application is accompanied by a comprehensive restoration scheme which (amongst other things) makes provision for high quality restoration, includes habitat creation and the provision of public amenity benefits, will see the removal of plant and machinery associated with both the processing of the sand and the treatment of imported restoration material and will prevent contamination of ground and surface waters.

### Policy W21: Cumulative Impact

There are two other waste management facilities in the vicinity of the site. The two sites (which adjoin each other) are located some 2km to the west on the outskirts of Storrington. Section 8 of this statement considers cumulative effects.

## 5.7 Horsham District Planning Framework

The Horsham District Planning Framework ("the HDPF") was adopted in November 2015 and is the overarching planning document for Horsham district outside the South Downs National Park. This document sets out the planning strategy for the period up to 2031 and will deliver the social, economic and environmental needs of the plan area.

As part of the statutory development plan for West Sussex unless material considerations indicate otherwise then planning applications must be determined in accordance with its policies.

This section will provide a commentary on how the proposal satisfies both the vision and the policies in the HDPF.

Repetition of the actual policy wording will be avoided wherever possible.

### Policy 1: Sustainable Development

This Policy is a "model policy" that is recommended for inclusion in all local plans as a means of ensuring compliance with the National Planning Policy Framework.

This application is considered to accord with the policies of the development plan for West Sussex (of which the Horsham District Planning Framework is a part) and therefore approval should be granted "without delay".

### Policy 10: Rural Economic Development

This Policy recognises the importance of what is described as "the rural economy" which amongst other things includes land based businesses. Maintaining the rural economy through appropriate development is something to be considered positively where it enables rural towns and villages to be "*economically vibrant*" through, for example, the generation of local employment opportunities.

Both applicants are local entities with local employees. Whilst the Policy is more about the conversion of rural buildings for suitable business uses, this proposal nevertheless will provide opportunities for existing and new employees whilst bringing forward a scheme of restoration which will substantially improve the environment, key elements of the Policy.

### **Policy 11: Tourism and Cultural Facilities**

This application is all about the safe and sustainable restoration of Rock Common Quarry and it is designed to include an element of informal, permissive public access and the provision of a recreational based “space” on the edge of the National Park providing an additional area of interest for visitors to the area.

### **Policy 24: Environmental Protection**

This Policy is concerned with the general protection of the environment in terms of managing surface water flooding, avoiding adverse noise impacts, improving air quality and reducing vehicle emissions.

This Environmental Statement includes a number of reports and assessments which deal with how the quality of the environment might be affected by the the proposed development. Where adverse impacts are identified then mitigation measures are proposed.

### **Policy 25: The Natural Environment and Landscape Character**

This statement considers in detail how the proposed development interacts with the natural environment, landscape and landform. The raising of levels within the quarry void to establish a dry, restored landform provides opportunities to enhance the natural environment through the provision of a variety of different habitats, thus increasing biodiversity. In addition, the proposed restoration will contribute to an improvement of the landscape and visual amenity of the quarry and its surrounds.

Rock Common Quarry is designated as a RIGS and whilst infilling will inevitably have an impact steps will be taken (as detailed elsewhere in this statement) to minimise this.

### **Policy 26: Countryside Protection**

This Policy seeks to ensure that the unique characteristics of the district’s landscapes are retained and, where practicable, enhanced. Development proposals are required to take into account the key characteristics of the landscape character areas.



Rock Common Quarry is located where it is because “minerals can only be worked where they are found” (NPPF, Paragraph 203). The proposed development concerns the restoration of the quarry as sand extraction nears completion. The development is “appropriate” despite its location in the countryside, not least because it meets one of the exceptions stated in this Policy: “*the extraction of minerals or the disposal of waste*”.

In addition, once restored the site will be available for “*quiet informal recreational use*”, through the provision of permissive footpaths, another exception stated in the Policy.

The proposed restoration of the quarry will enhance the landscape and has been designed to be sympathetic to the character of the landscape within which the site is located.

### **Policy 31: Green Infrastructure and Biodiversity**

Green Infrastructure is a term used to describe a multi-functional and connected network of green spaces, water and other environmental features in both urban and rural areas. The Policy recognises that new development can provide new "green infrastructure" through the provision of new green spaces. Similarly, development can create biodiversity, for example by planting native species as part of site landscaping.

The proposed development will create a restored and landscaped landform which will add to the existing green infrastructure. The proposed landscaping (planting/seeding and the provision of a range of different habitats) has been designed following the collaboration of consultants working on the scheme to ensure that the end-result complements the local landscape character and maximises opportunities for biodiversity.

### **Policy 33: Development Principles**

Those development principles (as listed in this Policy), which are appropriate and relate to the proposal, have been taken into account at all stages during the design of the scheme as evidenced in the detail provided throughout this application.

#### **Policy 34: Cultural and Heritage Assets**

Reference should be made to the report to be found at Appendix G in Volume 2 (Part 2) of this statement which deals specifically with the impact of the proposal on the historic environment. It is considered that following restoration the setting of those historic assets in the immediate vicinity of the site will benefit from the improved landform to be created and the landscaping to be provided. The historic environment will be conserved and enhanced.

#### **Policy 35: Climate Change**

Details of how the proposed development will contribute towards mitigating and adapting to the impacts of climate change can be found throughout this statement. Wherever possible all practicable measures will be taken to minimise greenhouse gas emissions and so contribute towards the District's carbon reduction targets.

#### **Policy 38: Flooding**

This Environmental Statement considers flood management as part of the assessment of hydrological and hydrogeological impacts (Appendix B in Volume 2 (Part 1)). Due account has been taken of the effects of climate change in this assessment.

### **5.8 Storrington, Sullington and Washington Neighbourhood Plan**

The Storrington, Sullington and Washington Neighbourhood Plan ("the Neighbourhood Plan") was adopted in June 2019 and covers the period July 2017 to March 2031. The Neighbourhood Plan contains policies, community aims, proposals and allocations designed to influence and manage development in the plan area.

This section will provide a commentary on how the proposal satisfies the policies and community aims in the Neighbourhood Plan.

Repetition of the actual policy wording will be avoided wherever possible.

### Policy 1: A Spatial Plan for the Parishes

This Policy sets the strategic direction for all other policies and steers new development into established settlements and controls development proposals elsewhere in the countryside. The effect of the Policy is to confine housing and other development proposals to within the "Built-Up Area Boundaries" unless such proposals are appropriate to a countryside location.

Rock Common Quarry is located where it is because "minerals can only be worked where they are found" (NPPF, Paragraph 203). The proposed development concerns the restoration of the quarry as sand extraction nears completion. The proposal is an "appropriate" development in the countryside not least because it meets one of the exceptions stated in Policy 26 of the Horsham District Planning Framework : "*the extraction of minerals or the disposal of waste*". The development conforms with the policies of the development plan.

### Policy 3: Employment Uses

This Policy supports the extending of existing employment on previously developed land outside of the National Park. The proposed restoration of Rock Common Quarry (including the extension of time to allow all remaining reserves of sand to be worked) will secure employment for the period of the development. The site is not within the National Park and an assessment of its impact on the setting of the National Park is considered elsewhere within this statement.

### Policy 8: Countryside Protection

This Policy seeks to protect the landscape, natural beauty and cultural heritage of the rural areas within the Neighbourhood Plan area.

Reference should be made to the detailed and comprehensive landscape and visual assessment which is provided support of this application (Appendix A in Volume 2 (Part 1)).

### Policy 15: Green Infrastructure and Biodiversity

The Neighbourhood Plan states that this Policy "*complements Policy 31 of the HDPF*" which has been commented on above and which equally apply to this Policy.



The proposed development will create a restored and landscaped landform which will add to the existing green infrastructure. The proposed landscaping (planting/seeding and the provision of a range of different habitats) has been designed following the collaboration of consultants working on the scheme to ensure that the end-result complements the local landscape character and maximises opportunities for biodiversity.

#### Policy 17: Traffic and Transport

Reference should be made to the Traffic Assessment which accompanies this application (Appendix F in Volume 2 (Part 2)) and which considers in detail the impact of road vehicles associated with the proposed development in terms of road capacity and safety to ensure that impacts on the local road network are “*not severe*”.

## 5.9 Wiston Whole Estate Plan

### Context

In 2015 the South Downs National Park Authority introduced the idea of "Whole Estate Plans". The aim of a "Whole Estate Plan" ("WEP") is to enable collaboration between individual estates and the National Park Authority in order to achieve the ambitions of the Estate and the purposes of the National Park and deliver a "Partnership Management Plan".

A WEP is a non-statutory plan. However, an endorsed WEP will be a material consideration in determining planning applications and will provide a solid, contextual background to any development proposal. That said, the inclusion of a development proposal within a WEP does not guarantee that planning permission would be granted and any proposal would still need to comply with relevant development plan policies.

An endorsed Whole Estate Plan (WEP) will be a material consideration in determining planning applications and will provide a solid understood contextual background to any development proposals.

The Wiston Estate WEP was endorsed by the SDNPA Policy and Resource Committee in July 2017.

It should be noted that whilst the application site lies outside of the National Park boundary and the planning authority is West Sussex County Council it is understood that the Wiston Estate WEP has been given "weight" by other local planning authorities when determining applications within West Sussex outside of the National Park. In addition, as statutory consultee, the South Downs National Park Authority will be required to take the Wiston Estate WEP into consideration in its response.

### Wiston Whole Estate Plan

The Wiston Whole Estate Plan ("WWEP") sets out a vision of how the Estate might develop over the period to 2030 and includes detail of specific projects that the owners would like to bring forward.

Amongst other things the vision includes ensuring that by 2030 Wiston will be "*a place for nature where careful stewardship enables and enhances networks of habitat set within valued landscape and heritage*". The Estate already plays its part in contributing to the special qualities of the National Park providing a rich variety of wildlife and habitats. Within the Estate there are 546 hectares of woodland cover (22% of the Estate area) of which 40% is ancient woodland and 27 hectares is chalk grassland. Forty different types of butterflies have been identified along with a wide range of priority species (including adder, grass snake, common lizard, slow-worm, common toad, great crested newt and water vole) and priority plants (including several types of orchid and white hellebore).

Specifically identified in the WWEP is the future restoration and use of Rock Common Quarry. Whilst the Estate has long-term plans for the site aimed at taking advantage of the site's location adjacent to the National Park the first step is to ensure the sustainable restoration of the quarry in a way which supports the vision and creating new habitats and enhanced biodiversity.

This application will provide a safe and sustainable restoration of Rock Common Quarry creating new habitats and increasing biodiversity. Additionally, the proposed "dry" restoration will ensure groundwater quality is not compromised and at the same time pumping of the groundwater will continue in order that the the water flow of Honeybridge Stream is maintained so securing the ecological status of this important headwater chalk stream.

### 5.10 Conformity

All of the above policies have been fully considered by all consultants and others having an input into this application. Where appropriate each individual consultant report and assessment has referenced the relevant policies which apply to the subject covered. This development is therefore considered to be fully in accordance with national, regional and local planning policy.

## SECTION 6

### *Environmental Considerations*

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#### 6.1 Introduction

The applicants recognise the importance of ensuring that the proposed development does not adversely impact on either the amenity of local communities or the environment generally. The operator in particular has a thorough knowledge of the potential impacts of its operations and it is this which underpins the decisions regarding the assessments made in support of this application.

This Section will summarise the potential environmental impacts associated with the proposed development. The full, detailed environmental impact assessments can be found in Volume 2 of this Environmental Statement.

Each consultant was appointed to produce an assessment in accordance with the parameters detailed in both the "Request for Scoping Opinion" and the "Scoping Opinion" itself. Copies of these documents can be found at Appendix 2 to this statement (Volume 1).

The summaries of the assessments provided below should be read in conjunction with the full reports and assessments which can be found in Volume 2 of this Environmental Statement.

#### 6.2 Landscape and Visual Impact Assessment

A Landscape and Visual Assessment has been prepared by Lizard Landscape Design and Ecology. The consultancy has been a registered Chartered Practice of the Landscape Institute for the past fourteen years, are members of the Arboricultural Association and are Chartered Members of the Institute of Ecology and Environmental Management.

The assessment was led by Joshua Peacock BA (Hons) MALA CMLI.

##### Summary

The proposed restoration will involve a continuation of development at the quarry for an additional period of some eight years. The main focus of activity will remain within the main body of the quarry both as the remaining sand reserves are extracted and the site is restored. As the sand reserves are exhausted there will be a shift of activity from the sand processing area to the restoration material reception area with a sustained minor adverse effect on local levels of low to moderate relative tranquillity over the duration of the restoration in contrast to the approved restoration under which this activity would substantively cease.

However, the proposed restoration will provide a gradual beneficial effect on the visual integrity, identity, scenic quality and tranquillity of the South Downs National Park associated with elevated views from the scarp to the south, looking north across the low Weald, (including from the South Downs Way to the south west).

As described within the Visual Amenity Assessment this is due to the relatively incongruous presence of the quarry within the landscape, which draws visual attention by measure of its scale, due to proximity and contrast in terms of its worked, yellow colour and sunken form.

This contrasts with the patchwork of fields, bounded by hedgerows and woodland and the undulating wooded low sandstone ridgeline which otherwise provides a coherence to the landscape and visual character within this area, and as compositional elements within scenic, panoramic northerly views across the Weald, within which the mosaic of woodland and fields form a tapestry, (increasingly wooded before fading to blue to the horizon) which contributes to the South Downs National Park special quality of "*diverse, inspirational landscapes and breath-taking views*".

As the proposed restoration progresses to the final stages the mosaic of open water, heathland and woodland will result in an integrated feature which, whilst still reasonably perceived as a restored mineral site within elevated views, is one which is a more naturalistic and proportionate in scale, the mosaic of habitat resulting in a moderate beneficial effect. The recommendations to be found in the assessment would further reinforce this effect resulting in a potential residual major beneficial effect, for example should the remnant landform be reinstated to its earlier natural extent, pre-quarry working.

All of the above is considered to be an improvement to the currently approved restoration scheme which would maintain a distinct separation and incongruity with the surrounding landscape character due to the sheer scale of the lake. This is considered to result in a more limited minor beneficial effect on the visual integrity, identity, scenic quality and tranquillity of the South Downs National Park. There is no precedent for such a large body of water viewed at this proximity to the escarpment outside of the natural floodplain of major rivers such as the River Arun (which is some 10km to the west). The most analogous water body is the artificial Arlington Reservoir (some 40km east of the Study Area) located some 4km offset from the escarpment at Wilmington Hill. The scale of the water body, as proposed to be created as part of the currently approved restoration, would continue to both physically and visually disrupt the more subtle association between the wooded, low sandstone ridgeline (and the remnant extent of this east of the A24 which the site contributes to) and surrounding field pattern.

In terms of a restored landscape the benefits from the proposed network of permissive footpaths within the proposed scheme would be significantly favourable to those resulting from the limited recreational benefits provided by the current approved restoration. Whilst the approved restoration might achieve an increased level of relative tranquillity for anticipated recreational users when in proximity to the glassy surface of the large lake (albeit hazardous and ecologically poor) this would not be comparable to the extent of recreational affordance and diversity of experience which would be achieved through the more extensive and naturalistic mosaic of water bodies and habitat resulting from the proposed restoration.

It is considered that the approach of the proposed restoration scheme would integrate into the Wealden Greensand landscape of both the Storrington Woods and Heaths, which occur to the north of the quarry, whilst extending a mosaic of habitat into the Central Scarp Footslopes which are found to the south. This is more in keeping than the singular large lake proposed under the approved scheme.

The currently approved restoration is considered to be a missed opportunity to maximise the potential for the restoration of the site. In general, a potential major-moderate beneficial effect on local landscape character is considered to result from the proposed scheme in comparison to a more limited minor beneficial effect which might be expected to result from the currently approved restoration.

For recreational users enjoying rights of way within the South Downs National Park on the escarpment and downland edge to the south-east of the site, as the proposed restoration progresses to the concluding stages the proposed mosaic of open water, heathland and woodland will result in an integrated feature having a more naturalistic effect, resulting in a moderate beneficial effect on the pleasantness of the view.

The recommendations within the LVIA are developed within an illustrative Landscape Design Strategy which has been further informed through collaboration with the ecological consultants.

The landscape design strategy builds on the aims of the currently approved restoration scheme, being *"to create an integrated ecological and amenity resource at the foot of the South Downs National Park escarpment, which integrates the Site into the surrounding landscape whilst enhancing sense of place"* whilst at the same time ensuring a more sustainable landform and sympathetic landscaping approach.

### 6.3 Hydrology, Hydrogeology and Flood Risk

Assessment of the hydrology, hydrogeology and risk of flooding has been prepared by H2Ogeo Hydrogeology and Environmental Consultancy. The consultancy is run by David Walker who is author of the assessment. David is a hydrogeologist with over 15 years of experience within the industry. His academic background is in Environmental Geosciences and he is a Fellow of the Geological Society and a member of the International Association of Hydrogeologists.

#### Summary

The currently approved restoration scheme for Rock Common Quarry is no longer considered an appropriate safe or sustainable restoration for the site resulting, as it does, in a very deep body of water within the former quarry void. Apart from safety issues there is significant potential for leachate pollution to pass into the lake from the now closed Windmill, Rough and The Rock Landfill sites. An alternative restoration scheme is being proposed whereby clean, inert restoration material would be imported to infill the void thereby providing a safe and sustainable restored landform and (importantly) cutting off the potential pollution linkage.

Following submission of a Hydrogeological Conceptual Site Model ("HCSM") to the Environment Agency in December 2019 and receipt of their comments in January 2020 further work has been undertaken to address the key points raised by the Agency. This further work has included creating a groundwater model in order to understand the hydrogeological regime on site and the surrounding area to see how this would evolve during and following the proposed restoration. Site work has included sampling of controlled waters and analysis of key compounds including chloride, ammonia, hydrocarbons and metals.

Groundwater modelling has been undertaken to represent the following two scenarios assessing,

- "baseline conditions" assuming the continued dewatering of the open quarry, and
- the infilled quarry void with a reduction and eventual cessation of dewatering

The combined results of the HCSM, laboratory testing and modelling have enabled assessments of,

- Potential water quality impacts from the historic local landfills
- Environmental impacts from the fill material and the need for geological barriers
- The impact of reduced dewatering and importation of fill material on local groundwater flows
- The impact of a rising water table on springs along the Greensand/Weald Clay contact to the north, and
- The impact on local water courses, primarily the Honeybridge Stream, to which the water pumped out of the quarry is discharged to

The baseline model demonstrates that groundwater contours range from 41 metres AOD after 365 days in the north west of the site along the route of the Honeybridge stream to c 10 metres AOD in the base of the quarry.

The groundwater flows from north to south and is dominated by the current abstraction at the quarry. Hydraulic gradients are relatively shallow outside of the site but steepen once inside the quarry, changing from 38 metres AOD to 10 metres AOD at the base, a change of 28 metres over 300 metres.

The Honeybridge Stream provides some recharge to groundwater. However this effect lessens as the model progresses past 10 years and drawdown of the water table further into the catchment occurs.

Groundwater heads around the lower permeability Marehill Clay, on the northern boundary of the site, are elevated.

The restoration model indicates that when abstraction rates are reduced to 2,000 cubic metres per day and groundwater elevations start to recover they will gain approximately 5 metres elevation over a 365 day period. At the end of an eight-year restoration period controlled groundwater will have recovered to approximately 26 metres AOD in the base of the quarry. Approximately two years after cessation of pumping groundwater in the area would be at an elevation of c 40 metres AOD.

The model predicts that throughout an 8 year restoration period, with controlled and reduced groundwater abstraction, the restoration surface remains safely above the groundwater recovery level so limiting contact and minimising risk to human health and the environment.

It should be noted that the model considers the "worst case" scenario assuming that the pumping of groundwater will cease following completion of the infilling. In order to protect Honeybridge Stream, which relies on groundwater pumped from the quarry for a significant element of its flow, the proposed restoration includes provision for maintaining access for pumps to the groundwater, through the construction of a well-like structure through the infill from which pumping of the groundwater can be maintained.

### **Flood Risk Assessment**

As the proposed development is greater than 1 hectare in area then a Flood Risk Assessment is required in accordance with the National Planning Policy Framework and Planning Policy Guidance.

The National Planning Policy Framework states that the flood risk assessment should identify and assess the risks of all forms of flooding to and from the development and demonstrate how these flood risks will be managed so that the development remains safe throughout its lifetime, taking climate change into account.

The types of flood risk that have been considered as part of this application are risk of flooding from rivers and the sea, surface water flooding and groundwater flooding.

The assessment concludes that because of the nature of the proposed restoration and increase in land form elevation the most likely potential risk of flooding from groundwater is not considered significant as the final restoration is not considered to be "vulnerable".

In line with Horsham District Council's Strategic Flood Risk Assessment<sup>3</sup> the proposed development will result in either "water compatible land use" or "informal open space" within areas of the site that are currently designated as Flood Zone 3. As a result the risk posed by flooding from rivers and surface water is not considered to be significant. The flood risk posed to, and by the, proposed development is deemed to be acceptable.

## **6.4 Ecological Impact Assessment**

The Ecology Assessment has been prepared by The Ecology Co-op Environmental Consultants. The assessment has been led by Paul Whitby who is the founder of the consultancy and the principal ecologist.

Paul is a Chartered Ecologist with thirteen years experience working as an ecologist and environmental consultant. In 2009 Paul set up Azure Ecology, a small independent ecological consultancy working with a network of sub-contractors across south east England. He founded The Ecology Co-op in March 2014 to replace Azure Ecology and accommodate his expanding team of ecologists. He has survey licenses for bats, dormice and great crested newts.

### **Summary**

Ecology Co-op were instructed to undertake an Ecological Impact Assessment of the proposal to vary the restoration scheme at Rock Common Quarry.

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<sup>3</sup> Scott Wilson (April 2010)



The scoping assessment identified the need for a suite of baseline ecological surveys at the site to fully assess the impact of the proposed scheme designed to create a safe and sustainable dry, restored landform and provide a range of habitats and enhanced biodiversity.

The quarry has been active since the 1920s and supports a range of habitats dominated by bare sandy ground, ephemeral vegetation, and exposed sand cliffs. In less disturbed areas developing scattered scrub, secondary woodland, and several water bodies can be found.

Baseline ecological surveys were undertaken between April and October 2020. The full assessment presents the findings of these surveys along with an Ecological Impact Assessment in accordance with CIEEM Guidelines.

The surveys revealed a breeding bird assemblage largely comprising common and widespread species but also including peregrine falcon and a breeding colony of sand martin. In addition surveys confirmed the presence of common dormice and reptiles, a rich and diverse terrestrial invertebrate assemblage (including a range of solitary bees and wasps associated with sandy ground) and an active badger sett. The invasive non-native species New Zealand Pigmyweed and false acacia were recorded on the site together with marsh frog.

A range of mitigation measures specific to the proposed restoration scheme are outlined in the assessment which provide details of how protected and notable species or habitats will be either protected through the establishment phase of the restoration or how appropriate replacement habitats or features will be created to produce either positive impacts for biodiversity or ensure any negative effects are minimised.

## 6.5 Noise Impact Assessment

The Noise Impact Assessment has been prepared by Clarke Saunders Acoustics. The assessment has been led by Dan Saunders. Dan has a Diploma in Acoustics and Noise Control from the Institute of Acoustics as well as a degree in Economics. He is the Immediate Past Chair of the Association of Noise Consultants, an ANC PCT Scheme Examiner and a Robust Details Senior Inspector. He is also the Chair of the IOA Southern Branch and serves on the ANC Membership Committee.

### Summary

A noise impact assessment has been undertaken of the likely noise emissions from the additional plant operating within the site and of changes to road traffic noise levels due to additional HGV movements associated with the importation of restoration material.

Current policy, legislation, guidance and standards have been followed in the assessments, combined with Local Authority consultation and consideration of extant planning permissions. A baseline noise survey has been undertaken to determine the current ambient and background conditions.

The worst case noise emissions from future site activity have been calculated at the most affected nearby residential receptors and this assessment has demonstrated that there will be no significant impact and that the extant noise conditions as found in the current planning permission for the quarry will be satisfied.



The worst-case traffic noise increases on local roads have been assessed and shows that there will be negligible impact. A cumulative scenario taking account of the nearby CEMEX site also shows negligible impact.

## 6.6 Air Quality Assessment and Dust Management Plan

Southdowns Environmental Consultants have prepared the Air Quality Assessment. Formed in 1996, Southdowns is an independent firm of environmental consultants with specialist interests in acoustics, noise, vibration and air quality. The company is a member of the Association of Noise Consultants and all consultants are affiliated with the Institute of Acoustics and other relevant professional bodies.

The assessment has been led by Daniel Wicker. Dan joined Southdowns in 2017 following the completion of his BSc (Hons) degree in Geography from the University of Exeter where he studied modules in Meteorology, Environmental Modelling, Land-Atmosphere Interactions and Applied GIS. He specialises in the preparation and delivery of air quality assessments and dust management plans. Since 2018, Dan has been an Associate Member of the Institute of Air Quality Management (IAQM) and the Institution of Environmental Sciences (IES).

### Summary

Baseline data indicates that annual NO<sub>2</sub> and PM<sub>10</sub> objectives are currently being met at and around the site and are expected to continue to do so.

The dust assessment followed IAQM guidance and identified that the proposed restoration will have, at worst, "negligible" to "moderate adverse" dust deposition effects at nearby sensitive receptors. For human health effects and ecological effects PM<sub>10</sub> emissions from the proposal are predicted to be negligible and the effect not significant. The overall effect from dust, including the cumulative effects of other relevant emission sources, was found to be "slight adverse" and not significant.

The road traffic assessment, using the ADMS-Roads dispersion model and IAQM/EPUK guidance, demonstrated that NO<sub>2</sub> and PM<sub>10</sub> changes from traffic introduced by the proposed restoration, including cumulative effects, would result in negligible impacts on local air quality and the effects would be not significant. Accordingly, no mitigation is being proposed for road traffic emissions.

A Dust Management Plan has been provided designed to mitigate dust impacts on local sensitive receptors which includes relevant good practice dust control measures.

## 6.7 Transport Statement

The Transportation and Access Statement has been prepared by GTA Civils and Transport Consulting Engineers. This well-established civil engineering consultancy has been providing specialist civil engineering and transport planning and modelling services for over 40 years. This assessment has been led by Lawrence Stringer BENG CENG MCIHT MRTPI. Lawrence has over 27 years of experience including senior management roles at both East Sussex County Council and West Sussex County Council.

## Summary

The Transport Statement has been prepared to assess the impact of traffic associated with the proposal to restore Rock Common Quarry.

Vehicle movements associated with the proposal will either be related to the restoration of the quarry or the continued exportation of sand. Trips associated with the continued sale of processed sand will be unchanged from the existing planning permission covering usage of the site. Access to and from the sand processing area will continue to be only via the A24/The Hollow junction.

Restoration material will be brought to the site by a combination of 20-tonne tippers and a variety of smaller delivery vehicles which will offload at a new "restoration material reception area" to be constructed on land previously forming part of the former Windmill Landfill site. Deliveries will only be made via the A283/The Hollow using the existing bellmouth and access which previously served the Windmill Landfill site.

The total number of daily movements associated with the importation of restoration material is assessed to be around 300 daily 2-way movements. Junction modelling has demonstrated that adopting a worst case, stringent assessment approach the A283/The Hollow junction would operate well within capacity, with appropriate visibility available in both directions.

The Transport Statement concludes that the development proposals are in accordance with local and national policy from a transport perspective and demonstrates that the proposed development will not result in severe impact to traffic flow or cause issues at the key junctions.

## 6.8 Archaeological Assessment and Heritage Statement

Development Archaeology Services Limited have prepared the Archaeology and Cultural Heritage Assessment, led by Christopher Pine. Chris founded the company in 1999.

### Summary

Sand extraction has been taking place within the site area since the early 20th century with a particular expansion in such activity having taken place during the course of the late 20th century. As a result of this activity any archaeological activity and finds which may have been situated within the already worked areas will have been long since removed. Any consideration of likely archaeological potential can only be, therefore, hypothetical.

Archaeological evaluation in 1995, and excavations in 2001, on Rock Common to the north-east of the current sand processing area identified a concentration of Mesolithic flint working activity. It is considered that there may have been the potential for similar such archaeological activity and finds to be made within application area but this is unknown.

Ground surface clearance in Old Furze Field and in Sand Corner Lane Field prior to sand extraction within the main quarry located finds of Roman pottery, a 4th century AD coin and a single cremation. It is considered likely that other contemporary archaeological activity and finds from this period may have been removed by the subsequent sand extraction. The potential for such finds would have been assessed as high, but because of their removal is now unknown.

Further ground surface clearance in Old Furze Field and in Sand Corner Lane Field prior to sand extraction also identified shards of medieval pottery. Medieval holloways have been identified from aerial photographs and, from the 1995 evaluation of Rock Common, within the eastern fringes of, and beyond, the sand processing area. It is concluded that it is highly possible that further archaeological activity and finds would have been made in these areas but these have been removed by the subsequent sand extraction. The potential for such finds is considered to be high, but because of their removal this is now unknown.

The map regression undertaken for this assessment has identified evidence for former post-medieval enclosure boundaries within the boundary of the main quarry, by contrast with the current sand processing area and the proposed restoration material reception area which were under rough grasslands or heathlands.

The site of a post-medieval brick and tile works was situated within what is now the sand processing area. There is also evidence (from aerial photographs) of post-medieval earthworks comprising trackways and holloways that have been identified within the eastern fringes of this area. Nearly all of this identified post-medieval archaeological activity will have already been removed by the sand extraction that has historically taken place within these areas. It is concluded, therefore, that the potential for archaeological activity and finds from this period would have been high but because of their removal this is now unknown.

There are a number of both designated and non-designated heritage assets from the post-medieval period which are situated in close proximity to the application area which have been identified by this assessment.

The identified designated heritage assets consist of the Grade II listed Green Farmhouse, the Grade II listed Rock House, the Grade II listed Rock Windmill and the Grade II listed Sandhill Farmhouse. The identified non-designated heritage assets comprise the site of a 19th century farm to the north-east of Green Farm, an 18th century farmstead at Green Farm and an 18th century farmstead at Sandhill Farm.

It is considered that the development will result in nil impact to any of the recorded listed or locally significant structures present within the study area. It is considered that there will be no significant modification in terms of setting/views to and from any listed building or building recorded as being of local architectural or historic interest.

The changes brought about by the proposal will be material considerations in respect of the potential impact that these may have on the settings and significance of the various identified designated and non-designated heritage assets. However, in all instances, it is considered that there will be no impact to the settings and significance of these various heritage assets as in all cases these assets cannot be directly viewed from the quarry because of the presence of heavy, dense and mature intervening mature woodland and hedgerow cover.

A nearby scheduled monument, the bowl barrow on Chanctonbury Hill, is situated some 1.5 km to the south of the quarry. It is considered that there will be no significant impact from the proposals upon the setting and nil impact to the fabric of this nationally important designated heritage asset. To the contrary, the proposed restoration is likely only to have a beneficial effect as regards views from the monument.

## SECTION 7

### Geology

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#### 7.1 Overview

The regional geology is detailed on the 1:50,000 BGS map (Sheet 318/333) and by the associated memoir (Young *et al.*, 1988).

The Weald Clay forms the major outcrop unit some 1.5 km to 2 km north of Rock Common Quarry. These strata are successively overlain southwards by younger strata comprising the Atherfield Clay, the Sandgate Formation, the Hythe Formation, the Folkestone Formation, the Gault Formation, the Upper Greensand and the (lower, middle and upper) Chalk strata, which form the South Downs hills to the south. Outcropping strata in the area of the quarry strike broadly from east to west, with a gentle dip to the south.

The quarry itself is situated within the Folkestone Formation of the Lower Greensand Group.

The site straddles almost the full north to south extent of the local outcrop of the southerly dipping Folkestone Formation. The southern margins of the site extend into the overlying Gault Formation whilst the northern boundary approaches the margins of the underlying Sandgate and Hythe Formations. Table 7.1 shows the local geological sequence.

#### 7.2 Detailed description

##### Gault Formation

The southern section of the site is excavated through the pale to dark grey or blue-grey clay or clays and mudstones of the Gault Formation that outcrop in this area to the south of the Folkestone Formation. The clays are approximately 15 metres in thickness in the vicinity of the site.

##### Folkestone Formation

Rock Common Quarry is almost entirely located within the Folkestone Formation. Here, the Folkestone Formation comprises pale yellow, medium to coarse sands with patchy iron staining.

The base of the Formation is the contact of sand or sandstone with the underlying silty clay or clayey silt of the Marehill Clay Member (Sandgate Formation) or with a heterogeneous succession of clays, silts and sands (Sandgate Formation, undifferentiated). The upper boundary is generally placed at the upward disappearance of sand at the base of the Gault Formation. Occasionally, the top of the formation can be at the base of the "Iron Grit", a hard, pebbly, limonitic, coarse-grained sandstone, an example of which can be seen at the nearby Chantry Quarry.

**TABLE 7.1**

Age	Group	Formation	Description	Local thickness (m)
Quaternary		Drift Deposits	Alluvium* <sup>1</sup>	Clay, silt and sand, locally organic, with gravel
			Head* <sup>1</sup>	
			Clay with flints* <sup>1</sup>	
Cretaceous		Upper and Middle Chalk *1		
		Lower Chalk *1		
		Upper Greensand* <sup>1</sup>	Siltstone and fine-grained SANDSTONE	
		Gault Clay* <sup>2</sup>		54 - 100 m
	Lower Greensand Group	Folkestone Beds* <sup>2</sup>	Medium to coarse grained SAND, weakly cemented, SANDSTONES. Sand becomes finer to the east	40 – 70
		Sandgate Beds* <sup>3</sup>	Variable lithology. Silty MUDSTONES. Fine Grained SANDSTONES. Clayey, pebbly, glauconitic Sandstones with CLAY BEDS. Friable, calcareous Sandstones.	17 (14 – 75)
		Hythe beds* <sup>3</sup>	Lithology varies from sandy LIMESTONE in the east to calcareous SANDSTONE in the west.	40 (14 – 75)
		Atherfield Clay *1	SHALE and MUDSTONE weathering to CLAY	0 – 8
		Weald Clay		
<p>*1 . Not present in the immediate area of the Site</p> <p>*2 . Economic deposit mineral extracted at Rock Common Quarry</p> <p>*3 . Undifferentiated in the area of Rock Common Quarry</p>				

### Geological sequence

In the immediate area of the site the Folkestone Formation has a proven thickness of between 40 and 70 metres. The strata dips southwards at a general angle of some 6 degrees, consistent with the regional structure imposed by the Wealden Anticline.

### Sandgate and Hythe Formations

The Sandgate and Hythe Formations underlie the Folkestone Formation throughout the region and are undifferentiated in the area of the site. The strata do not outcrop within quarry but have been exposed on land lying immediately adjacent to the northern boundary of the former Windmill Landfill site.

The Sandgate and Hythe Formations comprise inter-bedded soft and hard calcareous sandstones overlain by glauconitic sandstone.

Within the locality, the Formation contains an upper clayey unit known as the Marehill Clay Member. The Marehill Clay sub-crops up to greater than 20 metres in thickness to the east-north-east of the site (and immediately to the north of former Windmill Landfill) but its thickness decreases quickly towards the west to less than 5 metres beneath the quarry.

### Weald Clay

The BGS Washington borehole has proved the Weald Clay to be present immediately beneath the Sandgate and Hythe Formations.

## 7.3 Regionally Important Geological and Geomorphological Site

Regionally Important Geological and Geomorphological Sites (RIGS) are locally designated sites of local, national and regional importance for geodiversity (geology and geomorphology). They are conserved and protected from development as a material consideration through the planning system (under the relevant section of the Town and Country Planning Act 1990) although they do not have the statutory management protection enjoyed by Sites of Special Scientific Interest.

The concept of RIGS was first initiated by the Nature Conservancy Councils (NCC) publication "*Earth Science Conservation in Great Britain - A Strategy*" (1990). The designation of RIGS is one way of recognising and protecting important Earth science and landscape features for future generations to enjoy.

In West Sussex, sites were initially identified by a panel working at the Booth Museum of Natural History in Brighton from 1993 to 2006. Whilst there is no legal protection arising from a RIGS designation, it does draw attention to the importance of the site and the value in protecting its future. From 2011, the RIGS database has been managed by the Sussex Geodiversity Partnership.

Rock Common Quarry is a designated RIGS (Sussex Ref No TQ11/41). Details of the designation (including reference to features of interest produced by the Sussex Geodiversity Partnership) show that the quarry provides exposures of large, clean sections through the Folkestone Formation sands up to 40 metres in height. The site is also of importance for palaeoenvironmental studies.

### Planning policy context

Paragraph 170 of the National Planning Policy Framework (February 2019) requires planning policies and decisions to "*contribute to and enhance the natural and local environment*" by (amongst other things) "*protecting and enhancing...sites of...geological value...(in a manner commensurate with their statutory status or identified quality in the development plan*".

One of the strategic objectives of the West Sussex Joint Minerals Local Plan is "*to protect and, where possible, enhance the natural and historic environment and resources*" of the County. Policy M17 states that,

*Proposals for minerals development will be permitted provided that...there are no unacceptable impacts on areas, sites or features of regional or local...geological conservation importance unless the benefits of the development clearly outweigh both the impact on the features of interest and on the wider network of such designated areas or sites*

The West Sussex Waste Local Plan contains a similar policy. Policy W14 is worded almost identically to Policy M17,

*Proposals for waste development will be permitted provided that...there are no adverse impacts on areas, sites or features of regional or local...geological conservation importance unless the benefits of the development clearly outweigh both the impact on the objectives of the designation*

Policy 25 of the Horsham District Planning Framework refers to the maintenance of the existing network of geological sites.

### Impact of the proposal on the RIGS

The proposal is to infill the quarry void in order to provide a safe and sustainable, dry landform.

The void will be filled to levels ranging from 43 metres AOD at the southern end of the site, to around 55 metres AOD at the northern end of the site. The infilling will cover the high sand faces that can currently be found in the quarry and which form the feature of interest in the RIGS designation.

As detailed in Section 3 of the Environmental Statement the restoration as currently approved is considered to be problematical in a number of ways primarily because first of all it delivers a landform comprising of a large and very deep body of water with steep underwater slopes which would be unsafe and dangerous and secondly there is significant potential for leachate (contaminated liquid) from the adjacent closed landfill sites to pollute the restored water body and ground and surface waters.

In order, therefore, to safeguard the ground and surface waters from contamination it will not be possible to retain the high sand faces. The protection of the ground and surface water is considered to be a significant benefit which outweighs the impact on the feature of interest (Policy M17 of the West Sussex Joint Mineral Local Plan and Policy W14 of the West Sussex Waste Local Plan).

It is worth noting that the currently approved restoration, which provides for the quarry void to "flood" by allowing the ground water to recover to its natural level, would also cover the high sand faces which are the RIGS feature of interest.

### Mitigation

The importance of the RIGS is recognised not only as a "feature" but also in terms of its educational value. Policy M17 of the West Sussex Joint Minerals Local Plan makes provision for "*the investigation, evaluation and recording of important sites...and features*" where necessary, that is where the impact of development cannot be avoided.

It is proposed, therefore, to mitigate the loss of the sand faces by taking steps to ensure that the geology of the currently exposed high faces is properly recorded prior to infilling encroaching on the geological exposures. The British Geological Survey and the West Sussex Geological Society will be invited to survey, photograph and examine the exposed faces in advance of these being covered during the restoration of the site.



## SECTION 8

### *Cumulative Effects*

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#### 8.1 Introduction

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 require,

*a description of the likely significant effects of the development on the environment resulting from the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected<sup>4</sup>*

This section addresses the cumulative effects of the proposed development to assess whether the proposal will give rise to any changes that, when combined with other developments and activities in the area, will result in an unreasonable level of disturbance.

There is no standard prescriptive method for assessing cumulative and combined effects and, in relation to cumulative effects, the extent to which the effects of other developments can be assessed quantitatively depends on the level of information available about the other developments. Such effects are, therefore, assessed by professional judgement and where environmental assessment information regarding other developments is either not available or uncertain the assessment is necessarily qualitative.

A cumulative assessment aims to identify the potential for cumulative and combined effects expected to occur during the temporal scope of a development and, where possible, identify the possibility of significant effects. In determining the possible significance of such cumulative effects the location and timing of the identified developments and their associated impacts and effects should, wherever possible, be taken into account.

For receptors where a development's residual effects are deemed to be of negligible or minor significance it is considered that such receptors could not experience cumulative effects given that impacts resulting from the development would be negligible or very low, or the receptor would be of negligible or very low sensitivity to result in such an effect.

In assessing cumulative effects it is important to acknowledge the relative contributions the different developments make to a cumulative effect and to carefully consider whether a cumulative effect could occur at all.

#### 8.2 Policy Context

National and local planning policies seek to ensure that the cumulative impact of development would not result in significant adverse impacts on the environment of an area or on the amenity of a local community, either in relation to the collective effect of different impacts of an individual proposal or in relation to the effects of a number of developments occurring either concurrently or successively.

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<sup>4</sup> Schedule 4, Paragraph 5(e)



National Planning Policy Framework, Paragraph 205

*In considering proposals for mineral extraction, minerals planning authorities should... take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality*

West Sussex Joint Mineral Local Plan, Policy 22

*Proposals for minerals development, including the intensification of use, will be permitted provided that an unreasonable level of disturbance to the environment and/or to residents, businesses and visitors will not result, either individually or as a cumulative effect (simultaneously and/or successively) alongside other development and allocations. Planning conditions may be used to co-ordinate working, thereby reducing the cumulative impact.*

West Sussex Waste Local Plan, Policy W21

*Proposals for waste development, including the intensification of use, will be permitted provided that an unreasonable level of disturbance to the environment and/or local communities will not result from waste management and other sites operating simultaneously and/or successively. Phasing agreements may be sought to co-ordinate working, thereby reducing the cumulative impact.*

### 8.3 Successive Effects

Successive effects comprise the impacts caused by the proposed development in conjunction with other developments that occurred in the past, present or are likely to occur in the foreseeable future.

The proposed development will extend the period of operations at Rock Common Quarry by between 8 and 10 years. This includes both the extended period to allow the remaining sand reserves to be worked and the time to restore of the quarry. This is not an insignificant period of time. This Environmental Statement includes detailed assessments of the likely impacts of the proposal and these are deemed to be acceptable. In addition, the benefits associated with the revised restoration are many. Firstly, the prevention of pollution of ground and surface water and secondly the provision of a safe and sustainable restoration which will benefit local communities through improved visual amenity and the provision of informal access.

Overall, the benefits of the proposal are considered to far outweigh any short-term successive impacts that might arise during the course of the development.

### 8.4 Simultaneous Effects

Simultaneous effects comprise the impacts arising from multiple developments, occurring at different locations in the locality. Separately, such individual projects may not create an unacceptable degree of adverse impact but collectively the results may potentially be significant.

Other mineral operations in the immediate area of Rock Common Quarry include,

- Washington Chalk Pit, 1.4km south of the site, currently inactive (Dudman Group)
- Washington Sandpit (Hampers Lane), 1.8 km west of the site alongside the A283 on the outskirts of Storrington (Britanniacrest Recycling Limited)
- Sandgate Park Quarry, 2.2km west of the site, adjacent to Washington Sandpit (Inert Recycling Limited and CEMEX UK)
- Chantry Lane, 2.8km west of the site, currently inactive (Dudman Group)

Of these, the development at Sandgate Park Quarry was most recently granted planning permission. Planning permission for the continuation of sand extraction and subsequent restoration through the importation of inert material was granted by West Sussex County Council in January 2020.

In brief, the permitted development provides for the importation of 1.8 million tonnes of inert waste over 11 years, and the concurrent extraction and sales of 1.4 million tonnes of sand (8 to 10 years). Vehicle movements are stated to be 134 movements per day associated with the infilling element, plus 66 movements per day associated with the sand sales (that is 200 movements each weekday, half-day on Saturdays). There is legal agreement in place which requires all vehicles leaving the site to turn east along the A283 towards its junction with the A24.

It is unclear what percentage of vehicles will travel along the A283 beyond the A283/A24 junction. It is this traffic flow which would interact with vehicles transporting material for the restoration of Rock Common Quarry. There could be a possible combination of vehicles along a short (1.25km) stretch of the A283 between the A24 and the junction of the A283 with The Hollow.

The transport assessment, when considering the capacity of the junction of the A283 with The Hollow (the route for importing material), took into account additional traffic likely to be associated with the Sandgate Park development and concluded that the junction would operate well within capacity.

## 8.5 Combined Effects

Combined effects are those that could arise as a result of different impacts associated with the development interacting. It is important to recognise that potential benefits of the proposal should also be considered in the cumulative planning balance.

Interactions between more than one type of impact experienced at a particular receptor (for example, a receptor of noise and air quality impacts) are managed in the context of effects following mitigation. For example, in the case of interactions between noise and air quality potential impacts could be experienced simultaneously or intermittently. There is no direct connection between the impacts other than that both could cause annoyance, whether experienced separately or together.

Mitigation of interactions is best achieved through management of operations so as to prevent the individual impacts themselves from the outset and reduce the likelihood of such interactions occurring.

This Environmental Statement addresses the potential impacts of the proposed development by considering discreet environmental topic areas. However, many of the topic areas cannot be considered in isolation as changes occurring as a result of the development may have a “knock-on” effect on other topic areas. Key environmental topics have been identified and the assessment teams have interacted and reviewed the relevant assessments to ensure that interactions and combined effects are assessed.

The individual assessments conclude that there will not be significant combined effects on receptors as a result of these proposals.

## SECTION 9

### *Climate Change*

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#### 9.1 Introduction

Over recent decades climate change has become a key consideration when it comes to environmental, social and economic policy. Consequently, climate change is seen to be an important aspect of development proposals and of the decision making process.

Regulation 4(2)(c) of the Town and Country Planning (Environmental Assessment) Regulations 2017 states that:

*The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors...(c)...climate*

Schedule 4 of the same Regulations (*Information for the inclusion in Environmental Statements*) states that,

*A description of the likely significant effects of the development on the environment resulting from, inter alia...(f) the impact of the project on climate (for example the nature magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change<sup>5</sup>*

This Section considers the following,

- (i) The potential effects of the proposed development on climate change, with details of measures to be taken to reduce the emissions of greenhouse gases (mitigation)
- (ii) the vulnerability of the proposed development to climate change, with details of measures to be taken to ensure resilience to climate change (adaptation)

#### 9.2 Policy Context

##### *International Agreements*

In December 2015 the adoption of the Paris Agreement was agreed which outlined the aims of the United Nations Framework Convention on Climate Change being that member states should focus on meeting the ambitions of climate change targets first introduced in the Kyoto Protocol in 1992. The Paris Agreement stresses the "*urgency of accelerating the implementation of the Convention and its Kyoto Protocol*" and within this, ensuring that the long term temperature goals are met.

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<sup>5</sup> Paragraph 5(f)

Article 2 of the Paris Agreement sets out the ambition of holding the increase of average global temperature to "*well below 2°C*" and to pursue efforts to limit the temperature increase to 1.5°C. It was acknowledged that to achieve these ambitions there was a requirement to ensure parties reach global peaking of greenhouse gas emissions as soon as possible and do so by employing means that allow pathways toward "*low greenhouse gas emissions and climate resilient development*".

The Paris Agreement came into force on 4 November 2016 and the UK ratified the Agreement on 18 November 2016.

### **UK Context**

The UK Climate Change Act became law in November 2008. This legislation sets legally binding targets for reducing emissions of greenhouse gases by 2020 and 2050. The Act places a duty on the Government to ensure that the net UK carbon account for the year 2050 is at least 80% lower than the 1990 baseline.

The Climate Change Act established the principle of 5-year "carbon budgets", meaning the permitted level of greenhouse gas emissions in the UK over a specified 5-year period. The first three carbon budgets (covering the period 2008-2022) were approved by parliament in May 2009 and are now set in law. The fourth carbon budget (2023-2027) became law at the end of June 2011 and requires greenhouse emissions to be reduced to at least 50% during this period, relative to 1990 levels. The fifth carbon budget became law in July 2016 and requires greenhouse gas emissions to be reduced by 57% by 2030.

The Act established the Committee on Climate Change as an independent statutory body to advise the UK and devolved governments on setting and meeting carbon budgets and preparing for climate change.

The Act also requires the Government (on a 5-yearly cycle) to compile an assessment of risks for the UK arising from climate change and then to develop an adaptation programme to address those risks and deliver resilience to climate change "on the ground". In January 2017 the Government published the second risk assessment which identified six priority risk areas,

- Flooding and coastal change risks to communities, businesses and infrastructure
- Risks to health, well-being and productivity from high temperatures
- Risks of shortages in the public water supply and for agriculture, energy generation and industry
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity
- Risks to domestic and international food production and trade
- New and emerging pests and diseases and invasive non-native species affecting people, plants and animals

### National Planning Context

The National Planning Policy Framework aims to deliver sustainable development. To achieve this the NPPF requires development to mitigate and adapt to climate change (Paragraph 8(c)). Section 14 of the Framework (*Meeting the challenge of climate change, flooding and coastal change*) emphasises the proactive approach that the planning system should take to mitigating and adapting to climate change. New development should be designed so as to avoid increased vulnerability to impacts arising from climate change and planned in a way which helps reduce greenhouse gas emissions.

### Local Context

Policy M23 of the West Sussex Joint Minerals Local Plan requires proposals for minerals development to include measures that "*avoid or at least minimise greenhouse gas emissions, minimise the use of non-renewable energy...and ensure resilience and enable adaptation to a changing climate*".

Policy W12 of the West Sussex Waste Local Plan is similarly worded.

Chapter 10 of the Horsham District Planning Framework ("HDPF") sets out policies to deal with climate change. Development proposals are required to demonstrate what measures have been taken to mitigate and adapt to the effects of climate change. Policy 35 sets out measures which should be used to mitigate the effects of climate change including reduced energy use during construction, improved energy efficiency and reducing waste. In addition, development should adapt to climate change using measures including water conservation, incorporating flood reduction as part of the design and generally using design and construction techniques that provide resilience to climate change. Other policies relating to climate change in the HDPF concern efficient and appropriate energy use (Policy 36), sustainable construction (Policy 37) and flood risk management (Policy 38).

## 9.3 Significance

With respect to climate change there are no established thresholds for assessing the significance of an individual development's contribution to climate change. However, the Institute of Environmental Management and Assessment ("IEMA") Guide to Assessing Greenhouse Gas Emissions states,

*Greenhouse gas emissions have a combined environmental effect that is approaching a scientifically defined environmental limit, as such any greenhouse gas emissions or reductions from a project might be considered significant...therefore in the absence of any significant criteria or a defined threshold it might be considered that all greenhouse gas emissions are significant and an EIA should ensure that the project addresses their occurrence by taking mitigating action*

Appendix C of the IEMA guidance refers to the following principles,

- *Where greenhouse gas emissions cannot be avoided the EIA should aim to reduce residual significance of a project's emissions at all stages*

- *Where greenhouse gas emissions remain significant but cannot be further reduced...approaches to compensate the project's remaining emissions should be considered*

Further, the guidance states,

*When evaluating significance, all new greenhouse gas emissions contribute to a significant negative environmental effect: however some projects will replace existing development that have higher greenhouse gas profiles...the significance of a project's emissions should therefore be based on its net impact which may be positive or negative*

Table 9.1 provides a simplified interpretation of the guidance.

**TABLE 9.1**  
**Defining significance for climate change mitigation**

Significance of Effect	Criteria
No significant effect	The project will aspire to achieve net zero carbon emissions (that is, the development is "carbon neutral")
Positive effect*	The project will remove more carbon emissions from the atmosphere than it creates ("carbon negative")
Negative effect*	The project will create more carbon emissions than it removes from the atmosphere ("carbon positive")

\* Detailed evaluation will determine whether these effects are of major, moderate or minor significance

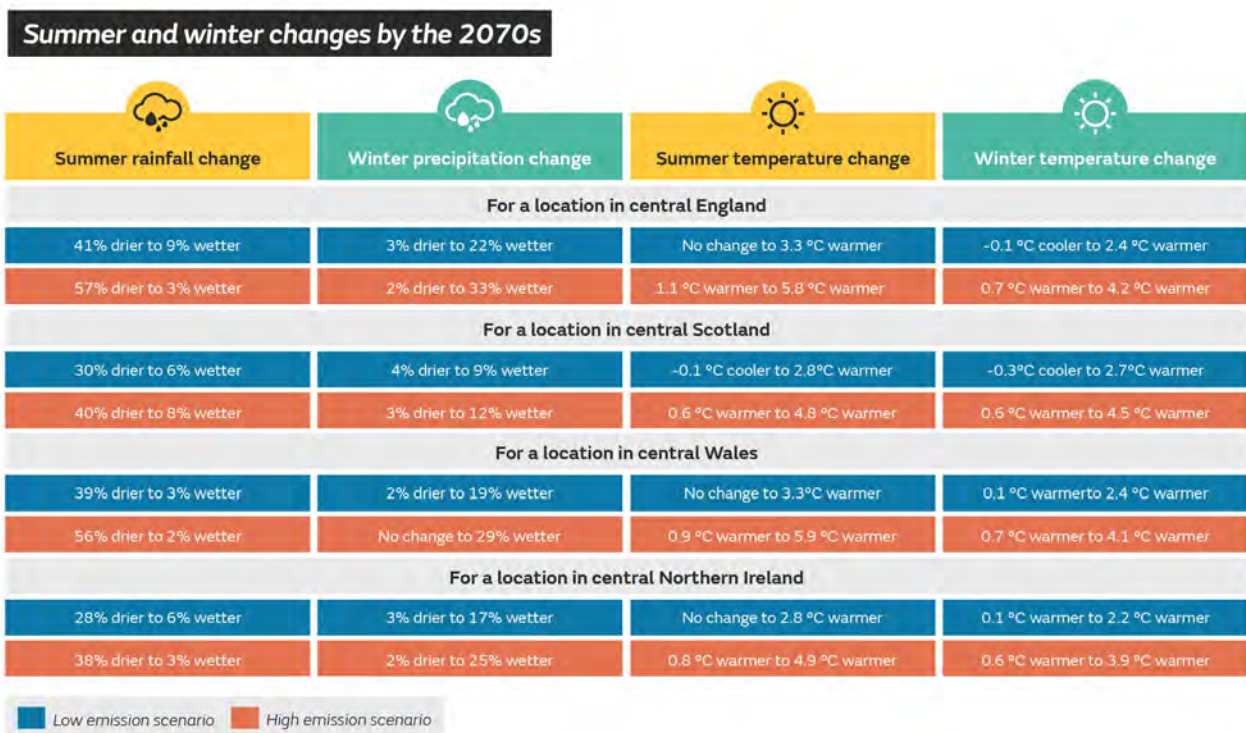
With respect to adapting to climate change the IEMA guidance explains that in determining significance account should be taken of the susceptibility or resilience of a receptor to climate change as well as the value of the receptor. A high value receptor that has very little resilience to changes in climatic conditions should be considered more likely to be significantly affected than a high value receptor that is very resilient to climatic changes. If there is uncertainty about how a receptor will adapt to a changing climate then a precautionary approach should be adopted.



## 9.4 Climate Change Projections

In considering future climate change scenarios the IEMA guidance recommends the use of the UK Climate Change Projections, produced by the Met Office. Projections are provided for a range of variables including temperature, precipitation and sea level rise. Figure 9.1 summarises projections for changes in temperature and rainfall by the 2070's.

**FIGURE 9.1**



General climate change trends broadly show an increased chance of warmer, wetter winters and hotter, drier summers along with an increase in the frequency and intensity of extremes.

By 2070, in the high emission scenario the temperature rise for the UK is projected to range between 0.9°C to 5.4°C in summer, and 0.7°C to 4.2°C in winter. Hot summers are expected to become more common.

The summer of 2018 was the equal-warmest summer for the UK along with 2006, 2003 and 1976. Climate change has already increased the chance of seeing a summer as hot as 2018 to between 12% and 25%. With future warming, hot summers by mid-century could become even more common, nearer to 50%. The temperature of hot summer days by the 2070's show increases of between 3.7°C to 6.8°C under a high emissions scenario, along with an increase in the frequency of hot spells.



Hot spells, typically defined as maximum daytime temperatures exceeding 30°C for two or more consecutive days, are largely confined to the south-east of the country. By the 2070's, under a high emissions scenario, the frequency of hot spells is projected to increase rising from an average present-day occurrence per year of 0.25 to 4.3 by 2070.

Rainfall patterns across the UK are not uniform and vary based on the season and geography. This will continue in the future. By 2070, in the high emission scenario, changes in precipitation range between -47% to +2% in summer, and -1% to +35% in winter (where a negative change indicates less precipitation and a positive change indicates more precipitation). Despite overall summer drying trends, future increases in the intensity of heavy summer rainfall events are predicted. For urban areas particularly this will impact on the frequency and severity of surface water flooding. Future climate change is projected to bring about a change in the seasonality of extremes with an extension of the convective season from summer into autumn bringing significant increases in heavy hourly rainfall intensity in the autumn. Significant increases in hourly precipitation extremes in the future are predicted. For example, rainfall associated with an event that occurs typically once every 2 years increases by 25% (central estimate). This has several implications for how we manage water. It is worth noting that whilst the intensity of hourly rainfall is projected to increase in the future, overall summers are projected to become drier.

## 9.5 Potential Effects of the Proposed Development

An overview of the proposed development is provided at Section 3 of this Environmental Statement.

Sources of greenhouse gas emissions associated with the development include the following,

- CO<sub>2</sub> and NO<sub>x</sub> emissions from vehicles and plant used during the implementation phase of the development, specifically the building of the "restoration material reception area" and the handling area within the quarry itself
- CO<sub>2</sub> and NO<sub>x</sub> emissions from vehicles and plant used during the infilling and restoration phase
- CO<sub>2</sub> and NO<sub>x</sub> emissions from vehicles bringing restoration material to the site
- CO<sub>2</sub> and NO<sub>x</sub> emissions from plant used to handle and process imported restoration material
- CO<sub>2</sub> and NO<sub>x</sub> emissions from plant associated with extraction and processing of the remaining mineral

Transport accounts for around a quarter of UK greenhouse gas emissions and government policy seeks to reduce these emissions by promoting public transport, supporting the market to develop innovative forms of transport and encouraging a move towards cleaner, and lower carbon, vehicles. The highest levels of vehicle movements associated with the proposed development will occur when restoration material is brought to the site and when sand is sold and exported from the site.

Whilst not necessarily an ideal situation, the use of plant and machinery, together with vehicles transporting processed sand from the site to the end-users, will remain the same, that is no increase.

During the restoration phase of the proposal, the items of plant and machinery handling and placing the infill within the quarry will be similar in type and number as those associated with sand extraction. During the period when both mineral extraction and restoration are occurring together, then there will be an increase use of plant and machinery.

Individual technical assessments will (where appropriate) comment on the impact of, resilience to and adapting to, climate change.

The applicants are conscious of the need to ensure that the impact of developments on climate change are minimised. The Dudman Group of Companies is actively looking at the options for using both electric powered vehicles and hydrogen powered plant but the development of non-diesel alternatives is in its infancy. Additionally, discussions are on-going with the former operator of the now closed landfill sites regarding the use of energy generated from the landfill gas which is still being produced.

In summary, the proposed development will have a negative effect on climate change. That is, the project will likely create more carbon emissions than it removes from the atmosphere. The significant majority of emissions are associated with vehicles and plant and machinery which will be difficult to reduce until such time as alternative "green powered" options are readily available.

By way of mitigation, the applicants are proposing to include areas of new woodland planting as part of the landscaping of the final landform as a means of offsetting some of the impact.

## SECTION 10

### *Population and Human Health*

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#### 10.1 Introduction

Regulation 4(2)(a) of the Town and Country Planning (Environmental Assessment) Regulations 2017 states,

*The EIA must identify, describe and assess in an appropriate manner, in light of each individual case, the direct and indirect significant effects of the proposed development on the following factors...population and human health*

Schedule 4 of the same Regulations (*Information for the inclusion in Environmental Statements*) states that,

*A description of the likely significant effects of the development on the environment resulting from, inter alia...the risks to human health...(for example due to accidents or disasters)<sup>6</sup>*

In the UK, the public health profession uses the World Health Organization definition of health, where health is defined as a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity

With regards to human health in EIA's a briefing note was issued by Public Health England to Public Health teams in England (published in July 2017) which states that,

*Population and human health will be on the list of environmental topics that will need to be considered when scoping every EIA, but should only be scoped into an EIA where the likely health consequences of the projects are considered to be significant*

In determining the likelihood of significant health effects as a result of the proposed development those assessments dealing with other environmental issues have considered and discussed these as appropriate.

#### 10.2 Accidents and Disasters

Schedule 4 of the Town and Country Planning (Environmental Assessment) Regulations 2017 requires an ES to include:

*A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters which are relevant to the project concerned*

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<sup>6</sup> Paragraph 5(d)

It is considered that potential significant adverse effects on the environment could occur as a result of the following,

- environmental accidents or incidents
- general natural disasters such as flooding, fire, explosion, landslide and earthquake
- individual emergencies such as injury, illness, fatality, drug reaction or medical emergencies
- civil disorders such as bomb threat, civil disturbance and strikes

Dudman (Rock Common) Limited has a comprehensive Accident and Emergency Procedure in place for the existing development at Rock Common Quarry which seeks to prevent and limit environmental accidents and includes contingency procedures in the case of accidents and emergencies.

Whilst an emergency will usually be the result of a malfunction of normal operation procedures (for example plant or human error) it may also be caused by uncontrolled outside influences such as severe weather conditions (high winds, thunderstorms, etc), flooding or emergencies at adjacent premises or further beyond the site boundary. The company's procedures have been developed to deal with such circumstances and cover the following areas,

- Roles and responsibilities
- Injuries and fatalities
- Summoning emergency services
- Raising the alarm and evacuation
- Assembly point locations
- Fire and/or explosion
- Environmental pollution to water and air
- Incident log sheets
- Management of major incidents

The currently approved development at the quarry is well managed in accordance with the control and management procedures already in place, not only through the planning system but through other relevant regulatory regimes, and Dudman (Rock Common) Limited will continue to operate in accordance with these measures.

## SECTION 11

### ***Aerodrome Safeguarding Statement***

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#### **11.1 Context**

The County's "*Local List for the Validation of Planning Applications (June 2019)*" requires an Aerodrome Safeguarding Statement to be provided where applications involving landfilling are within 15km of either Gatwick Airport, Goodwood Aerodrome or Brighton City Airport.

Rock Common Quarry is some 30km from Gatwick and 25km from Goodwood Aerodrome. However, Brighton City Airport lies just within 15km of the site and therefore this statement is being provided in order that the application meets the validation criteria.

This Aerodrome Safeguarding Statement will demonstrate that the development will not constitute a hazard to air traffic.

#### **11.2 Introduction**

"Safeguarding" is a planning term meaning "*to safeguard an established land-use*". The process involves checking development proposals to ensure, in this instance, that aviation interests are protected. This is done by,

- Protecting the blocks of air through which aircraft fly
- Avoiding any increase in the risk to aircraft of a bird-strike by preventing an increase in hazardous bird species in the vicinity of an airfield and, wherever the opportunity arises, to reduce the level of risk
- Protecting the integrity of radar and other electronic aids to air navigation by preventing reflections and diffractions of the radio signals involved
- Protecting visual aids, such as approach and runway lighting, by preventing them from being obscured or preventing the installation of other lights which could cause confusion

#### **11.3 The Development**

Rock Common Quarry lies some 11.5km NW of Brighton City Airport.

The airport, which is owned and operated by Brighton City Airport Limited, is used by privately owned light aeroplanes, flying schools and for light aircraft and helicopter maintenance and sales. A number of operators provide flying lessons, sight-seeing and pleasure flights.

The main, surfaced runway (Runway 02/20) is aligned NNE-SSW whilst the second, grass runway is aligned ENE-WSW. Neither runways would be approached from the NW or involve aircraft departing in a NW direction (that is from, or towards, Rock Common Quarry). The proposal does not include operations or construction at height such that there would be potential for interference with airspace.

The proposed development involves the restoration of the quarry by infilling and raising levels using inert material. This type of material does not attract birds, vermin or insects. To the contrary, it is often a requirement of permits issued for putrescible, household waste landfill sites that inert material is used as daily to cover over the waste in order to deter birds from feeding and to reduce the emergence of flies. The proposed development will not, therefore, lead to an increased risk of bird-strike.

No element of the proposed development will have the potential to impact on radar or other electronic aids to navigation neither will there any interference with visual aids.

In summary, the proposed development will not constitute a hazard to air traffic at Brighton City Airport.

**APPENDIX 0**

***Planning Permission WS/15/97***

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**ENVIRONMENT ACT 1995  
REVIEW OF OLD MINERAL PLANNING PERMISSIONS  
DETERMINATION OF UPDATED CONDITIONS**

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To Tarmac Heavy Building Materials Limited.  
Stancombe Quarry,  
Flax Bourton,  
BRISTOL BS48 3QD

In pursuance of their powers under the above-mentioned Act, the Council hereby notify you that they **DETERMINE** your application for the:-

**Determination of Conditions to which mineral planning permissions WS/6/53, WS/19/58, WS/31/65, WS/3/68 and WS/39/73 for the winning and working of sand at Washington Rock Common Sandpit, Washington are to be subject.**

Submitted to this council on 30<sup>th</sup> April 1997 and modified by a revised submission received on 30<sup>th</sup> January 2004 (and in accordance with the relevant correspondence a copy of which is attached\*) as specified hereunder:

1. Unless otherwise agreed in writing by the Mineral Planning Authority the winning, working and treatment of sand together with the deposit of mineral waste shall be carried out in accordance with the written statement contained in the Review submission and plans R32/85, R32/86, R32/87, R32/89, R32/90, R32/91 and R32/92 submitted on 30<sup>th</sup> January 2004.

Reason : To enable the Mineral Planning Authority to control the development in detail and to minimise its impacts on the environment and the amenities of the locality.

2. Unless otherwise agreed in writing by the Mineral Planning Authority all mineral extraction at the site shall cease on or before 31<sup>st</sup> December 2020.

Reason : To provide for the completion of working at the site within an agreed timescale in the interests of the amenities of the locality.

Signed  
for Head of Planning Services

Date

16th September 2004



Page 1 of 10

N.B. The reasons for imposing the above conditions are as specified after the conditions.  
\* The words in brackets do not apply unless a copy of the relevant correspondence is attached.  
Your copy of the application, determined as above, is returned herewith for your records.



**CONTINUATION SHEET**

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3. The Mineral Planning Authority shall be notified in writing that mineral extraction has ceased within one month of the permanent cessation of mineral extraction.

Reason : To enable the mineral Planning Authority to control the development.

4. Not later than two years from the date of the permanent cessation of mineral extraction at the site, or at the conclusion of any extended period for compliance that may be agreed in writing by the Mineral Planning Authority, the restoration of the site shall be completed in accordance with the restoration scheme submitted and agreed pursuant to condition 31 of this permission.

Reason : To secure the restoration of the site within the agreed timescales in the interests of the amenities of the locality.

5. Unless otherwise agreed in writing by the Mineral Planning Authority within twelve months of their becoming permanently redundant in connection with the operation of the site or on the permanent cessation of mineral extraction at the site or by the 31<sup>st</sup> December 2020, whichever is the sooner, all buildings, plant, machinery, equipment and mineral stockpiles within the site not otherwise required for the security, monitoring and maintenance of the site in accordance with the agreed restoration scheme shall be removed and the sites thereof restored in accordance with the agreed restoration scheme.

Reason : To ensure the completion of the restoration of the site within the agreed timescales in the interests of the amenities of the locality.

6. Unless otherwise agreed in writing by the Mineral Planning Authority in advance of its implementation or in the event of an emergency, the need for which shall be notified to the Mineral Planning Authority within twenty four hours of the need to operate occurring, no operations other than site dewatering, water pumping and environmental monitoring shall be carried out on the site except between the following times:

07.00 to 18.00 Monday to Friday,  
07.00 to 13.00 on Saturday

and no operations shall be carried out on Sundays, Public and Bank holidays, save that work of plant maintenance and testing may be also carried out on Saturdays between 13.00 and 18.00.

Reason: In the interests of the amenities of the locality.

7. No access to the site shall be made by traffic collecting sand from or delivering equipment, personnel and materials to the site other than through the existing access to the processing yard north of The Hollow. The access to the part of the site south of The Hollow shall only be used, other than in emergency, for the movement of plant, personnel and machinery required to facilitate the sand extraction process and the

**CONTINUATION SHEET**

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proper maintenance, security and restoration of that part of the site. No extracted sand shall be moved across The Hollow by means other than the conveyor beneath The Hollow except, in an emergency, such instances to be notified to the Mineral Planning Authority within twenty four hours of such occurrence, the road access may be used.

Reason : In the interests of highway safety and the amenities of the locality.

8. No extraction of sand shall take place below the depth of 10 metres AOD unless additional inert materials become available to the site (as a result of further importation under planning permission WS/18/95 or from any further planning permission authorising the importation of additional restoration materials to the site) in which case and subject to the written prior approval of the Mineral Planning Authority of a revised working and restoration scheme for the site to that agreed under the terms of this permission deeper extraction of sand is permitted down to the maximum depths specified in the geotechnical report 'Addendum Report on Potential Basal Heave' dated February 2001 contained within the Review submission.

Reason : To ensure that the land is worked and restored to a safe and satisfactory landform in the interests of the after use and stability of the land and the amenities of the locality.

9. No disturbance of the surface of the land shown between the red and blue lines on the eastern side of the list site on Plan R32/92 and comprising the site of Green Farm shall be undertaken unless and until the details of the proposed workings and restoration of the land, including any consequent amendments to the working and restoration scheme for the adjacent sand workings to the west, have been submitted to and approved in writing by the Mineral Planning Authority. The submitted scheme shall include details of the measures to be adopted to investigate and record the listed buildings and archaeological features within the site and the stability and hydrogeology of the site. The scheme, as approved, shall be implemented throughout the course of the development.

Reason : To enable the Mineral Planning Authority to control the development in detail in the interests of the environment and amenities of the locality.

10. No further working of sand shall take place within the area subject of planning permission WS/6/53 unless and until a scheme of proposed operations and restoration has been submitted to and agreed in writing by the Mineral Planning Authority. Such scheme as may be approved shall be carried out throughout the course of the development.

Reason : To ensure the satisfactory conduct of operations in this part of the site in the interests of the environment and amenities of the locality.

## CONTINUATION SHEET

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11. Within six months of the date of this permission a scheme for the management of dust arising from the working and processing of sand and as a result of transport movements associated with operations shall be submitted for the approval of the Mineral Planning Authority. The scheme shall be implemented as agreed throughout the development.

Reason : To protect the amenities of local residents and the local environment and to ensure highway safety.

12. No plant and machinery shall be operated on the site unless fitted with silencers maintained in accordance with the manufacturers recommendations and specification.

Reason : In the interests of the amenities of residents and the locality.

13. No plant or machinery used in connection with the operations on the site shall be operated so as to cause a noise level measured at a position one metre in front of any occupied building on land adjacent to the site which exceeds 55dB Laeq, 1hr during the authorised working hours at the site and at a level not more than 5dB Laeq, 15minutes above the measured background level of noise without any plant or machinery in operation at the site at the specified locations at any other time.

Reason : In the interests of the amenities of residents near to the site and the locality in general.

14. Notwithstanding the requirements of condition 13 of this permission in the event of temporary works necessary for the operation or restoration of the site by reason of construction of baffle mounds, soil stripping, removal of soil storage mounds and the construction of the new permanent restoration landform the noise level criteria expressed in condition 13 may be exceeded subject a maximum of 70 dB Laeq, 1hr as measured at the specified locations for up to eight weeks in any twelve month period. Prior to the commencement of any operations on the site that the operator considers are likely to invoke the measures authorised by this condition the operator shall give not less than seven days notice to the Mineral Planning Authority of his intention to carry out the works.

Reason : In the interests of the amenities of residents near to the site and the locality in general and to enable site works and restoration works to be undertaken when necessary close to the site boundaries.

15. Notwithstanding the provisions of conditions 8, 13 and 14 of this permission, no work of face stabilisation that may be required adjacent to the property Green Barn Farm on the eastern part of the site shall be commenced unless and until a detailed noise assessment has been carried out and a scheme of working including noise amelioration measures has been submitted to and approved in writing by the Mineral Planning Authority.

Reason : To enable the Mineral Planning Authority to control the development in detail and the protect the amenity of the residents of Green Barn Farm.

**CONTINUATION SHEET**

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16. Unless otherwise approved in writing by the Mineral Planning Authority or in the circumstances of an emergency (which shall be notified to the Mineral Planning Authority within 24 hours of the situation arising) the site dewatering and water pumping system shall be electrically powered.

Reason : To protect the amenities of the locality and residents close to the site.

17. The site shall not be artificially lit except during the permitted hours of working and maintenance or by intruder triggered security lighting.

Reason : In the interests of the amenities of the locality.

18. Within three months of the date of this permission measures shall be implemented to the satisfaction of the Mineral Planning Authority to ensure that:-

- a) no fuel oil powered mobile plant shall be operated on the site other than that essential to undertake the mineral extraction, site re-configurations measures and subsequent restoration of the site,
- b) no refuelling or maintenance of machinery shall be carried out on the site other than within a impermeable surfaced servicing area equipped with fluid interceptors capable of containing the total volume of fluids held on the servicing area within vehicles or storage tanks at any one time. The interceptors shall be maintained in effective operational condition throughout the period they are in use,
- c) oil storage tanks shall be sited upon impermeable bases enclosed by oil-tight walls the enclosure of which shall retain a volume of at least 110% of the capacity of the oil tank and include all fill and draw pipes and be capable of containing and maintained free of accumulations of rainwater,
- d) no plant or equipment shall be used on site other than having been subject to a daily recorded inspection for leaks or faults with the potential to lead to spillages of fuel or oils,
- e) sufficient oil sorbant material shall be available on site at all times during the periods plant or equipment is in use on the site to cope with a loss of the total fluid content of the largest item of plant. Any used oil sorbant material shall only be disposed of off the site in accordance with relevant waste disposal legislation for the disposal of contaminated materials.

Such measures as may be employed and agreed to achieve the requirements of this condition shall be maintained throughout the course of the development hereby approved

Reason : To protect ground and surface water resources.

Date... 16 September, 2004

Signed..... 

## CONTINUATION SHEET

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19 Prior to the cessation or reduction of quarry dewatering operations at the site the details and method of the manner in which the change shall be undertaken, supported by technical assessments of the implications and effects of the cessation or reduction of dewatering undertaken by the persons responsible for the operation, maintenance and restoration of the site, shall be submitted to and agreed in writing by the Mineral Planning Authority. The submitted scheme shall address :-

- i) the likely open water quality of the restoration lake with respect to the potential for ingressing groundwaters to contain landfill leachate and the need for remedial measures,
- ii) the potential for a reduction of discharge of water to the Honeybridge Stream to impact upon the habitats and utility of the watercourse and an evaluation of the need for any managed reduction of discharge rates over time to minimise any identified potential impact on surface water habitats and the ecology of the streams environs,
- iii) the need for managed recovery of lake water levels to ensure the stability of restored quarry faces and the lake margins.

The scheme, as agreed, shall be followed throughout the course of further operations restoration works and aftercare at the site.

Reason : To protect ground and surface water resources and to ensure the integrity of the restoration of the site.

20. No trees, shrubs or hedgerows within the site boundary delineated in blue on plan R32/85 shall be damaged, destroyed, uprooted or removed other than as required by the operational and working scheme agreed under condition 31 and the landscape mitigation planting proposals agreed under condition 21 of this permission or with the express prior written agreement of the Mineral Planning Authority. No felling or clearance of trees and shrubs shall take place within the period of 1<sup>st</sup> March and 30th June in any year other than with the prior written agreement of the Mineral Planning Authority.

Reason : In the interests of the environment and landscape of the locality and to protect wildlife.

21. Not later than the 31<sup>st</sup> January 2005 details of a scheme of landscape planting in the areas illustrated for hedgerow maintenance and re-establishment on Plan R32.91 shall be submitted for the approval in writing of the Mineral Planning Authority. The scheme shall specify :-

- i) the maintenance regime for existing trees and shrubs and the position, species mix, density and initial sizes of all new hedgerow shrubs and trees proposed for the sections of hedgerow subject of the scheme,

**CONTINUATION SHEET**

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- ii) a programme for the implementation of the scheme and arrangements for subsequent maintenance.

The scheme shall be carried out as approved or as varied by the written agreement of the Mineral Planning Authority.

Reason : To improve the visual appearance of the site and screen the workings in the interests of the visual amenities of the locality.

22. Not later than the 31<sup>st</sup> January 2005 schemes of monitoring, including an implementation programme, to determine :-

- (i) the rate of recession of the Folkestone Sand faces shown hatched orange on Plan R332/91 and the trigger point at which stabilisation works would require to be implemented (The Recession Monitoring Scheme) and,  
(ii) the suitability of remedial measures to stabilise the Folkestone Beds faces should the trigger point in (i) above be reached (The Scheme of Stabilisation Trials).

The schemes, as approved in writing by the Mineral Planning Authority, shall be implemented.

Reason : To monitor the stability of the Folkestone Beds slopes and to identify measures that are to be implemented to ensure the security of the restoration faces and the stability of the public highway, The Hollow, and the residential properties comprising Green Farm.

23. Unless otherwise agreed in writing by the Mineral Planning Authority, the Drainage Rectification Scheme submitted on the 30 January 2004 shall be fully implemented within six months of the date of this permission and thereafter the modified drainage system shall be maintained in effective working condition.

Reason : To secure satisfactory drainage of the site and assist in ensuring the stability of the Gault Clay quarry face.

24. Unless otherwise agreed in writing by the Mineral Planning Authority, the Gault Clay Slope : Grass and Willow/Alder Mix Planting Establishment Scheme submitted on 30<sup>th</sup> January 2004 shall be fully implemented within twelve months of the date of this permission and thereafter maintained in accordance with the provisions of the Scheme.

Reason : To improve the stability of the Gault Clay quarry face.

**CONTINUATION SHEET**

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- 201
25. Not later than the 31<sup>st</sup> January 2005 a scheme (The Gault Clay Slope : Stability Monitoring Scheme) and programme of implementation shall be submitted for the written approval of the Mineral Planning Authority to monitor the success of the stability measures agreed under the terms of conditions 23 and 24 of this permission and the monitoring and inspection regime to be adopted to inspect the site for any evidence of instability. The Scheme as agreed shall be implemented.

Reason : To monitor the success of the remediation measures agreed under conditions 23 and 24 of this permission in the interests of the stability of the site.

- 201
26. Not later than the 31<sup>st</sup> January 2005 a scheme (The Gault Clay Contingency Stabilisation Scheme) and programme of implementation shall be submitted for the written agreement of the Mineral Planning Authority to provide details of the manner in which evidence of further instability of the Gault Clay quarry face arising from the studies of the Gault Clay Slope :Stability Monitoring Scheme or from evidence of instability being noticed in the land south of the red line A - B on Plan R32/91 will be addressed and the possible remedial measures, including alternatives, that would be adopted by the persons responsible for the site. The Scheme as agreed shall be implemented. Any failure or instability noted in the land south of the line A - B shall be notified in writing to the Mineral Planning Authority within two working days of the failure or instability being detected.

Reason : To secure the stability of the Gault Clay quarry face and to ensure the continuing stability of the highway land adjoining the site.

27. Unless otherwise agreed in writing by the Mineral Planning Authority the Site shall be restored as a landscaped lake for associated amenity and conservation use in accordance with the proposed restoration landform shown on drawing R32/87.

Reason : To secure the satisfactory restoration of the site in the interests of the amenities of the locality.

28. No movement or respreading of subsoils and topsoils shall take place other than when the soils are in a dry and friable condition and the movement of the soils is undertaken utilising equipment designed to give the minimum of compaction to the materials.

Reason : In the interest of the final restoration of the site by minimising the structural damage and compaction of the soils.

29. Unless otherwise agreed in writing by the Mineral Planning Authority the inert materials deposited in the site pursuant to planning permission WS/18/95 shall be used only in connection with the progressive restoration of the site and in particular and where practicable and appropriate for the regrading working faces below 40 metres AOD.

Reason : to ensure the effective utilisation of the inert materials within the restoration of the site in the interests of the stability and security of the worked faces.

Date 16<sup>th</sup> September, 2014

Signed.....

**CONTINUATION SHEET**

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30. Unless otherwise agreed in writing by the Mineral Planning Authority within two months of the completion of the restoration landform within each of the 'working areas' illustrated on drawing R32/87 a 'Restored Soils and Landform Reconciliation Plan' shall be submitted to detail :-

- a) the final restored topographic levels,
- b) the location and type of the materials used within the surface of the final restored landform
- c) an analysis of pH, magnesium, phosphate and potassium of the restored surface soils.
- d) The variations, if any, from the proposed restoration landform illustrated on drawing R32/87.

Reason : To ensure that the restored profiles and the type and fertility of the surface materials of the restored landform are accurately determined to enable the appropriate restoration and aftercare of the site.

31. Unless otherwise agreed in writing by the Mineral Planning Authority within two months of the completion of the restoration landform within each of the 'working areas' illustrated on drawing R32/87 a 'Detailed Scheme of Restoration and Aftercare' for the working area expanding upon and relating to the concept restoration illustrated on drawing R32/86 shall be submitted for the written agreement of the Mineral Planning Authority. The detailed scheme required under this condition shall include :-

- a) a detailed restoration plan taking into account the Restored Soils and Landform Reconciliation Plan required under condition 30 of this permission and showing the location of proposed land utilisation in the scheme,
- b) the manner in which the proposed uses shall be provided, established and maintained,
- c) the manner in which any open water area and the establishment of marginal reed and aquatic plant species will be provided, established and maintained,
- d) the specification of any path or roadway within the area,
- e) the specification, provision and maintenance of surface water control measures, sub-surface drainage system and methods employed to secure the stability of the land surface,
- f) the type and extent of ground preparation and cultivation works to be carried out prior to seeding or planting activities,
- g) the proposed aftercare works to be undertaken for a period of five years following completion of the restoration works specified in the scheme, including the provision for monitoring, assessment and any necessary modification of the aftercare scheme,



CONTINUATION SHEET

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- h) measures for the introduction of any nursery crop, seed mixtures, the plant specification, number and location and measures for their protection and survival associated with the provision of heathland, woodland or planting of trees in the scheme.
- i) The arrangements for liaison and monitoring with the Mineral Planning Authority in the detailed execution of the scheme.

The scheme, as approved, shall be implemented.

Reason : To secure the implementation and delivery of a restoration scheme able to ensure the restoration of the site in accordance with the concept restoration plan in the interests of the amenities of the locality.

32. Notwithstanding and additional to the requirements under the restoration scheme to be agreed under condition 31 of this permission, within one month of the 30<sup>th</sup> September in each year of the aftercare periods specified in condition 31 a detailed 'Annual Aftercare Report' shall be submitted recording the aftercare operations carried out on the site during the previous twelve months and for the written approval of the Mineral Planning Authority of the variations to the agreed aftercare scheme proposed for the remaining period of the aftercare. The steps to be taken in the aftercare shall be those necessary to return the site to a safe, secure and satisfactory condition in accordance with the concept restoration plan for a landscaped lake and nature conservation use.

Reason : To ensure the satisfactory restoration of the site.

33. In the event that operations at the site cease without the operator having provided the Mineral Planning Authority with a scheme for the management and restoration of the site at the date of the cessation the landowner or persons responsible for the site shall within three months of the date of cessation either recommence extraction or submit to the Mineral Planning Authority proposals for the management and restoration of the site including a timetable of works to be undertaken from that date giving the details required by conditions 30 to 32 inclusive of this permission. The proposals, as agreed in writing by the Mineral Planning Authority, shall be carried out as agreed.

Reason : To secure the restoration and management of the site in the interests of the amenities of the locality and stability of adjacent land.

## **APPENDIX 1**

### ***Validation Requirements Checklist***

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## National Validation Requirements

Document	Location
Completed application form	Submitted via Planning Portal
Plans and drawings	ES Volume 1, Appendix 4
Site location plan	ES Volume 1, Appendix 4
Site boundary plan	ES Volume 1, Appendix 4
Design and Access Statement	Not required
Ownership Certificate	Submitted via Planning Portal
Application fee	Submitted

## Local Validation Requirements

Document	Location
Drawings/plans/sections	ES Volume 1, Appendix 4
Elevations	Not applicable
Site location plan	ES Volume 1, Appendix 4
Topographic survey and existing/proposed cross sections	ES Volume 1, Appendix 4

Document	Location
Aerodrome Safeguarding Statement	ES Volume 1, Section 11
Air Quality Assessment	ES Volume 2, Part 2, Appendix E
Alternative sites assessment	ES Volume 1, Section 4
Archaeological assessment	ES Volume 2, Part 2, Appendix G
Dust assessment	ES Volume 2, Part 2, Appendix E
Ecological appraisal	ES Volume 2, Part 2, Appendix C
Flood risk assessment	ES Volume 2, Part 1, Appendix B
Foul and surface water drainage assessment	Not applicable
Heritage Statement	ES Volume 2, Part 2, Appendix G
Hydrological/hydrogeological assessment	ES Volume 2, Part 1, Appendix B
Land contamination assessment	Not applicable
Landscape and visual impact assessment	ES Volume 2, Part 1, Appendix A
Lighting assessment	ES Volume 2, Part 2, Appendix C
Need statement	ES Volume 1, Section 3

Document	Location
Noise assessment	ES Volume 2, Part 2, Appendix D
Planning obligation (draft)	Not applicable
Planning Statement	ES Volume 1, Section 5
Recovery v Disposal Statement	ES Volume 1, Section 5
School travel plan	Not applicable
Stage 1 Road Safety Audit	Not applicable
Transport assessment or statement	ES Volume 2, Part 2, Appendix F
Tree (arboricultural) survey	ES Volume 2, Part 1, Appendix AC
Working and/or restoration aftercare scheme	Proposed that provision of aftercare scheme be conditioned

## APPENDIX 2

### *Scoping Opinion*

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**THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL  
IMPACT ASSESSMENT) REGULATIONS 2017:  
REGULATION 15 – Request for a Scoping Opinion**

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**Proposal**

The continued winning, working and processing of sand, 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.

**Site**

Rock Common Quarry, the Hollow, Washington RH20 3DA

**Applicant**

MgM Consulting for Dudman Rock Common Limited.

**Date received**

1 July 2019

**Classification of the Proposed Development and requirement for an Environmental Impact Assessment**

The applicant states that the development falls within Part 19 of Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the 'EIA Regulations') because it relates to a quarry with a surface area which exceeds 25 hectares. However, it would not be 'the carrying out of development to provide' such a quarry as it already exists. On this basis, it is not considered to fall within Schedule 1.

However, it is considered to fall within part 11(b) of Schedule 2 to EIA Regulations because it comprises an installation for the disposal of waste, and with a site area in excess of 0.5 hectares, exceeds an applicable threshold.

Annex A to the government's Planning Policy Guidance (PPG) on Environmental Impact Assessment (EIA) sets out indicative criteria and thresholds for considering whether developments within Schedule 2 require EIA. For waste proposals, EIA is more likely where sites exceed 10 hectares, and/or where new capacity of more than 50,000 tonnes/year is proposed. In this case, it is proposed to import some 4.05 million tonnes (2.7 million cubic metres) of inert waste at a rate of 517,500 tonnes/year (345,000 cubic metres/year) to restore the site. It therefore significantly exceeds the indicative criteria.

In addition to exceeding these criteria, the site is within 50m of the South Downs National Park, contains areas at increased risk of flooding, and in close proximity to Listed Buildings. The potential for significant impact is therefore increased.

On this basis, the development is considered to have the potential for significant environmental effects, given the physical scale of the development, the amount of waste to be imported, and the sensitivity of the receiving environment and

surroundings. It is therefore considered to be EIA development within the meaning set out in the EIA Regulations.

Further, the applicant has confirmed their intention to submit an Environmental Statement (section 1.3 of the Scoping Request).

The EIA Regulations allow for a developer to ask the local planning authority for their formal opinion (a 'Scoping Opinion') regarding the information to be supplied in the Environmental Statement (ES). This provides clarity as to what the local planning authority considers the main effects of the development are likely to be, and accordingly, the main topics on which the ES should focus.

West Sussex County Council (WSCC) has provided this Scoping Opinion in response to the information provided by the developer on 1 July 2019. In providing this response, consultation has been undertaken with the relevant statutory authorities, along with the relevant Parish Council.

## **SCOPING OPINION**

### **1. Location**

- 1.1 For the avoidance of doubt, it is assumed that the site boundary is that shown on the Site Context plan (ref. DG/RCQ/ESR/19-01) in blue, with land hatched in blue 'land also in applicant's control'.
- 1.2 The site is a sand quarry extending to some 28.5 hectares in area, comprising two parcels of land separated by a road called 'the Hollow'. The southern part of the site contains the main sand quarry, with the smaller, northern area, connected by a conveyor, used for processing and storage of material for export.
- 1.3 The pit itself has been excavated since the 1920s and is now at varying depths, with the extant permission (WS/15/97) allowing excavation to 10m AOD.
- 1.4 The site is located in Horsham District, some 285m north-east of the village of Washington, with smaller hamlets and individual houses in all directions, including Rock, some 85m to the north-east. The A24 extends in a north-south direction to the west of the site and the A283 east-west along its southern boundary.
- 1.5 To the north-east of the site, beyond the Hollow, are former municipal landfills known as Windmill, the Rock and the Rough.
- 1.6 The nearest residential properties to the site are at Sandhill Farmhouse, a grade II listed building some 70m west of the site, south of which is a camping and caravan park a similar distance away. Green Farmhouse, a grade II listed building, immediately abuts the site to the east, as does Rock Windmill, immediately east of the processing area and also a grade II listed building,
- 1.7 The site is at closest some 30m north of the South Downs National Park, separated from it by the A283. The land rises up south of the site to Chanctonbury Hill which includes a Site of Special Scientific Interest (SSSI) some 920m south-east of the site; ancient woodland some 700m south of the site; and Chanctonbury Ring Scheduled Monument some 1.5km south-east of the site.



- 1.8 Washington Conservation Area is some 320m south-west of the quarry beyond the A283.
- 1.9 The site contains a public right of way (footpath 2710) along the southern boundary, and another (footpath 2604) crosses the plant site to the north. There are a large number of public rights of way in the vicinity of the site providing links into the national park and surrounding countryside.
- 1.10 The quarry is a Regionally Important Geological Site (RIGS) because of its importance for the study of geology and geomorphology.

## **2. Planning History**

- 2.1 Planning permission was first granted in 1947 to allow sand extraction to continue at part of the site (the processing area and the Rough landfill) under an Interim Development Order. Planning permissions were subsequently granted between 1953 and 1973 to allow sand extraction in the main pit area south of the Hollow.
- 2.2 A ROMP (Review of Old Minerals Permissions) planning permission was granted on 16 September 2004 in relation to the site (ref. WS/15/97 – see Appendix C to the Scoping Request). This allowed excavation to continue until 31 December 2020, a date put forward by the operator, and thus allowable as a shorter period than the 2042 date set out in legislation.
- 2.3 Otherwise the permission required, among other things, restoration to be completed within 2 years of excavation having been completed (condition 4); set hours of operation (0700 – 1800 Monday – Friday; and 0700 – 1300 Saturday)(condition 6); restricted access to/from the site only through the processing yard north of the Hollow (condition 7); restricted extraction below 10mAOD (condition 8); restricted noise levels to 55dB at occupied buildings on land adjacent to the site (condition 13); restricted artificial lighting (condition 17); and required the submission of various schemes, including relating to the dewatering that is essential to prevent contamination.
- 2.4 The site was to be restored to a large lake, as approved through condition 31 of the permission, and as per Appendix B to the Scoping Request (concept restoration scheme – drawing R32/86).
- 2.5 A new ROMP is due by 31 December 2018 but the County Council has agreed a postponement following the operator's confirmation of their desire to submit an application for a revised restoration scheme and receipt of this Scoping Request.

## **3. Proposal**

- 3.1 It is proposed to seek permission for an amended site restoration, changing it from the currently-approved 'landscaped lake' to a dryer landform with shallower areas of water to provide increased biodiversity and recreational opportunities.
- 3.2 The approved scheme would have a single lake across the former quarry, sloping down to 42m AOD with water levels at 40m AOD and a maximum quarry floor depth of 10m AOD. The applicant states that with a final water level of 40m AOD, and groundwater levels at the adjacent Windmill Landfill site

required to be maintained at (at least) 30m AOD, there is a risk that pollutants from the landfill would flow into the new lake.

- 3.3 The approved form of the lake is also considered dangerous due to its significant depth and steep underwater sides.
- 3.4 The applicant therefore considers that a 'dry' restoration would overcome this risk, and ensure a 'more productive and sustainable end-use of the restored land'. This would be achieved by using imported material to raise the level of the quarry floor to above that of the natural, groundwater level.
- 3.5 It is therefore proposed to import some 4.05 million tonnes (2,700,000 cubic metres) of inert material at a rate of 517,500 tonnes/year (345,000 cubic metres/year), over a period of 8 years. This would result in an average of 500 HGV movements/day (250 HGVs travelling to/from the site) in relation to the infill.
- 3.6 Inert material would be brought to the site via the A283 to the south, and the Hollow, where it would use the former Windmill Landfill access. Material would be deposited in an area close to the conveyor tunnel which runs into the main quarry under the Hollow. This would separate it from sand export movements which travel to/from the site via the A24 to the north.
- 3.7 The processing area would require expansion, though details have not been provided. Material would be deposited, and sorted using a 'raker' or 'skeleton' bucket attached to an excavator.
- 3.8 The extraction of sand would continue in the same manner as they have been under the extant permission. It is noted in the Scoping Request (paragraph 6.6.3) that the remaining sand reserves would take some 12 – 18 months to exhaust to the approved extraction levels, and that any crossover of extraction and restoration would be 'minimal'.
- 3.9 It has therefore been assumed that the two operations would be undertaken simultaneously for a period so brief as to not result in greater impacts than the proposed infill operation alone.

#### **4. Scope of the Environmental Statement**

- 4.1 Every Environmental Statement (ES) must provide a full factual description of the development, and consideration of the 'main' or 'significant' environmental effects to which the development is likely to give rise. The ES should, wherever possible avoid the use of jargon and be written in easily-understood language.
- 4.2 Every ES must also contain the information set out in Regulation 18 of the EIA Regulations, along with such information from Schedule 4 of the Regulations as is reasonably required to assess the effects of the project. With reference to Regulation 18 and Schedule 4, the ES should contain (in summary), as a minimum:
  - o a full description of the development, including physical characteristics and land-use requirements, during both the infill stage and post-restoration;
  - o a description of the likely significant effects of the project on the environment, and the methodology used to predict them;

- features of the development or measures envisaged to avoid, prevent, or reduce, and if possible, offset likely significant adverse effects on the environment. All mitigation relied upon for the purposes of the assessment should be clearly detailed in the ES, along with mechanism to secure it;
- a description of the reasonable alternatives relevant to the proposed development and its specific characteristics, and reasons for the choice made. In this case, a clear, detailed comparison will be required of the approved restoration with the proposed restoration, as well as landforms requiring less imported waste;
- a non-technical summary; and
- a statement from the developer outlining the relevant or qualifications of the competent experts who have prepared the ES.

4.3 In accordance with Regulation 18(4), the ES must also:

- be based on this Scoping Opinion (or if updated, the most recent Scoping Opinion issued);
- include information *“reasonably required for reaching a reasoned conclusion on the likely significant effects on the environment”*, taking into account current knowledge and assessment method; and
- to avoid duplication, take account of the results of any relevant UK environmental assessment which is reasonably available.

4.4 Any updated requirements set out in the Planning Policy Guidance: Environmental Impact Assessment should also be taken into account.

4.5 The ‘baseline’ for the application in relation to the site, should be the operations undertaken to date under the extant planning permission (ref. WS/15/97). It should not include consideration of operations at Windmill Landfill because these have ceased for a significant period of time.

4.6 The assessment should take a ‘Rochdale Envelope’ approach to considering the development, with a ‘worst case scenario’ assessed, so that anything less can be considered acceptable.

4.7 The following sets out the County Council’s views as to the main issues which will need to be considered in an ES relating to the development, with reference to the submitted Scoping Request. It does not prevent the County Council from further requests for information at a later stage under Regulation 25 of the EIA Regulations, if deemed necessary.

4.8 Much of the submitted Scoping Request is generic, without details of the extent of study areas, sources of information, identification of sensitive receptors, or what would be scoped out of each topic chapter. It may therefore be necessary to seek clarification or even a further Scoping Opinion once this detail has been prepared.

### **Landscape and Visual Impact**

4.9 The proposal has the potential to result in significant visual impacts, and impacts on the landscape, both during infill/excavation operations and once

restored, particularly given its location in close proximity to the South Downs National Park.

- 4.10 The general approach to undertaking an assessment of landscape and visual impact set out in the Scoping Request is agreed. However, it is very generic, without reference to viewpoint locations, a zone of theoretical visibility, identification of Landscape Character Areas or consideration of the specific impacts the proposal may have, and over what period. It is therefore difficult to provide detailed feedback on what the ES should include.
- 4.11 Nonetheless, the application should be accompanied by a Landscape and Visual Impact Assessment (LVIA) based on the third edition of Guidelines for Landscape and Visual Impact Assessment (2013). This should inform the landscape and visual impact chapter of the ES. It should consider the potential impacts of the proposed development as a result of changes in the landscape character, and the nature and extent of the visual effects, during both the infill and restoration phases of the development.
- 4.12 As per paragraph 6.1.7, viewpoints should be agreed with the County Council, though we do not have a Landscape Officer.
- 4.13 As set out in the response from SDNPA, the ES should include:
- The extent of the proposed study area.
  - Sources of relevant information.
  - The nature of possible effects and their likely significance.
  - The main receptors (landscape and visual) identified.
  - The extent of and proposed level of detail for the baseline studies.
  - Method for determining significance.
  - How cumulative effects will be assessed.
- 4.14 The assessment should identify the sensitivity of the landscape resource and visual receptors, describe the direct and indirect impacts of the proposed development on those resources and receptors, and establish the significance of effect. The landscape assessment should be illustrated by supporting figures to show the relationship between the development and the various landscape character areas and particularly the SDNP.
- 4.15 The five Grade II Listed Buildings referred to at 2.3.3 are of particular relevance to the proposals, because of their proximity to the quarry, so should be included amongst the viewpoints in the LVIA, and should cross-refer to the Cultural Heritage Impact Assessment - both from the buildings to the quarry and across the quarry to the buildings.
- 4.16 Clarifying and assessing in detail the impact of the proposal on Chanctonbury Ring Scheduled Monument will be of particular importance, given its elevated position and views into the site.
- 4.17 The chapter should explore, and evidence, how much the revised site restoration would contribute positively to the setting of the SDNP, both in visual and landscape terms. As noted by the SDNPA: *"this will be a fundamental element of the Baseline Studies as it will help to determine the significance of any effects upon the National Park and its Purposes. It will require a synthesis of multiple strands of evidence to produce a holistic understanding of the site."*

- 4.18 Verified photomontages and visualisations should be provided so that the impact of the proposal on the surrounding area is clear. The site is in close proximity to the SDNPA, public rights of way, major roads, and a dwellings so has significant potential for landscape and visual impact if not managed carefully.
- 4.19 As with all topics, the LVIA should make a clear comparison with the landscape visual impact of the current approved restoration scheme with the proposed restoration scheme, including during both the infill stage and once restored.
- 4.20 A range of cross sections should also be provided, including at least one comparing the approved landform with the proposed landform.
- 4.21 Mitigation and enhancement measures should be clearly detailed, including through an outline landscape masterplan and an Arboricultural Impact Assessment, which should include existing features (trees and hedgerows), any proposed removals in the quarry and processing area, protection measures for those to be retained, and proposed planting, as well as an ongoing programme of maintenance.
- 4.22 The following (non-extensive) resources should be used to inform the chapter:
- South Downs National Park Integrated Landscape Character Assessment (2011)
  - Horsham Landscape Capacity Assessment, April 2014;
  - Horsham District Landscape Character Assessment, October 2003
  - A Strategy for the West Sussex Landscape, October 2005
  - West Sussex Landscape Character Guidelines
  - Historic Evidence (maps, historic landscape characterisation)
  - South Downs National Park Viewshed Characterisation and Analysis (2015)
  - South Downs National Park Tranquillity Study (2017)

### **Hydrology, Hydrogeology and Flood Risk**

- 4.23 To provide certainty regarding the water environment, evidence must be provided to confirm the statement (paragraph 3.1.2) that the former operator of Windmill Landfill is under an obligation to keep the level of groundwater below 30 metres AOD.
- 4.24 The approach set out in section 6.2 of the Scoping Request is generally considered to be comprehensive. The work feeding into this section of the ES should be undertaken by a chartered hydrologist, given the complicated water environment in which quarry is located.
- 4.25 The information submitted should clarify whether it is proposed to continue to pump the site under the new scheme, or if it is proposed to cease this operation, at which stage it would stop, and what assessments would be undertaken to ensure this is done without increased impact on the

environment. A strategy should be included relating to the management of surface water drainage during both the construction period and after completion of the project, following the principles set out in the West Sussex Policy for the Management of Surface Water.

- 4.26 The interaction of the site's water environment with the neighbouring landfills should be clearly assessed and appropriate mitigation measures, if required, clearly identified at an early stage so that their impact on other issues can be taken into account.
- 4.27 While the proposed scheme appears to address protection of restoration lakes against leachate, it is unclear how it will safeguard groundwater flows and the Honeybridge stream. This must be clarified in the submission.
- 4.28 The measures for ensuring material is clean and uncontaminated should be specified, including what would be covered off through the Environmental Permitting process.
- 4.29 Borehole data from around the site should be used to inform the preparation of the chapter. Monitoring of groundwater levels in existing boreholes should be undertaken over the winter period (October to March) when seasonal groundwater levels are likely to be at their highest.

### **Ecology**

- 4.30 As an overall comment, the restoration should seek to maximise biodiversity through retaining and enhancing, and/or creating a diversity of habitats, including those currently found within the site.
- 4.31 The Scoping Report provides only a partial account of the ecological interest of the quarry. However, it usefully identifies a range of further ecological surveys which will be required to support the EIA.
- 4.32 The Phase 1 Habitat Survey states that records of protected species were obtained from The Sussex Biodiversity Record Centre on 20th February 2015. It is recommended that updated records are obtained for the EIA, and up to date surveys are undertaken.
- 4.33 In describing the habitats present within the site, the sand faces appear to have been largely overlooked. The ecological interest associated with the sand faces, includes breeding peregrines and an important sand martin colony. Additionally, they may have invertebrate interest, such as solitary bees and wasps which nest in sand faces.
- 4.34 Further, the feasibility of retaining some vertical sand faces for their ecological and geological interest should be explored – as reflected in section 2.3.6 of the Scoping Report which states *"...if the upper levels of the Folkestone Formation can be safely left revealed then the final design will try to incorporate this."*
- 4.35 It is strongly recommended that the EIA is based on a recent breeding bird survey which should pay special attention to recording species afforded protection under Schedule 1 of The Wildlife & Countryside Act (1981) including peregrine and little ringed plover, plus sand martin. The vertical sand faces are known as a regular nesting site for a pair of peregrines and a sand martin colony of county-wide significance.

- 4.36 In addition to a breeding bird survey, other surveys as proposed in the Phase 1 Habitat Survey, including, but not limited to, reptiles, bats, badger and great crested newt, should be undertaken to inform the EIA.
- 4.37 The EIA will need to consider potential impacts of the restoration scheme, both during the infill works and in the long term, on the ecology of Honeybridge Stream. Issues to investigate include water flows and sediment load, as well as disturbance of habitat and species, and removal of trees and other habitat. A clear scheme of ecological mitigation should be set out during on-site operations, as well as long term schemes for enhancement. This should include commitment to ongoing maintenance of biodiversity features.
- 4.38 The EIA will need to include a detailed account of the ecological interest of the quarry, including the habitats and features of note such as the sand faces, protected and notable species. This will need to be based on recent ecological surveys. The EIA will also need to address ecological impacts through detailed plans for mitigation, compensation and enhancement measures.

### **Noise and Vibration**

- 4.39 The general approach to consideration of noise impacts set out in 6.4 of the Scoping Request is agreed.
- 4.40 However, the sensitive receptors that may be impacted by the scheme should be agreed with Horsham's Environmental Health Officers rather than relying on existing receptors (as per paragraph 6.4.2). The proposal represents a significant intensification of operations over the approved restoration. In addition, ground levels will be raised, potentially having greater impacts on surrounding residents. HGVs are travelling to/from the site via the A283, rather than current arrangements via the A24. There is therefore the potential for a significant change to the noise environment.
- 4.41 Noise impacts resulting from site operations in the main quarry, in the processing area, and resulting from vehicle movements to/from the site will need to be assessed. The use of a raker bucket is a noisy operation, so an estimate of the hours/day this is likely to take place should be provided, and any mitigation measures set out.
- 4.42 In order that a worst case scenario can be assessed, consideration of noise impacts should take into account the maximum number of HGVs travelling to/from the site, and the maximum amount of material being processed/infilled. The scenario should be explicitly set out in the submission.
- 4.43 The noise impact of 500 HGVs travelling to/from the site must be assessed in full, as well as the cumulative impact of this alongside site operations including screening and plant movements.
- 4.44 The noise impact should be assessed in accordance with BS5228:2009 (Code of practice for noise and vibration control on construction and open sites).
- 4.45 Practical mitigation measures should be clearly identified for each phase of infill works, taking into account the changing topography of the site. These can include temporary bunds formed of imported material, but the phasing of the bund creation and removal should be made clear, along with any visual impacts.

## **Air Quality, including Dust**

- 4.46 The Scoping Request notes (paragraph 6.5.1) that operations will be undertaken in accordance with limits set in the 2004 permission.
- 4.47 However, the proposed development is a significant change and intensification of operations over those currently undertaken on the site and in HGVs travelling to/from the site, with a resulting change in impact on air quality. It is proposed to process significant amounts of imported inert material, deposit in the quarry at reducing depths (and therefore increasing risk of dust release from the site), and significantly-increased HGV and plant movements. There are sensitive receptors in close proximity to both the quarry and processing area. A quantitative assessment of the impact of these operations on air quality must therefore be undertaken.
- 4.48 It is not sufficient for the assessment to look only at the air quality impact resulting from the traffic arising from the works (paragraph 6.5.1). It will need to also consider the change in impact resulting from the infill operations, including the potential for significant dust nuisance. The assessment should follow the IAQM [Guidance on the Assessment of Mineral Dust Impacts for Planning \(2016\)](#). Reference should also be made to the most recent version of IAQM's ['Land-use Planning and Development Control: Planning for Air Quality' \(2017\)](#).
- 4.49 A fully quantitative assessment must be undertaken of the air quality impacts of the proposal, not a semi-quantitative assessment (paragraph 6.5.3).
- 4.50 The impact of the extended operational period should be clearly set out, including the cumulative impact of the site's location beside two A-roads, and the cumulative temporal impact of ongoing operations.
- 4.51 Reference must be made to the Air Quality and Emissions Mitigation Guidance for Sussex (2019) which takes a low-emission approach to avoiding cumulative impacts of new development such as this. A mitigation plan which accords with this guidance must be prepared to feed in to the air quality chapter of the EIA.
- 4.52 It is agreed that mitigation measures should be set out in the submission, through a Dust Management Plan.

## **Transportation and Access**

- 4.53 The general approach to considering the impacts of transportation and access through the EIA is agreed, but it is noted that this will be largely informed by the Transport Assessment, the scope and methodology of which will need to be agreed with WSCC Highways.
- 4.54 As well as an average number of HGV movement, the maximum number of movements each day should be quantified.
- 4.55 The impact of the proposals on the public right of way (PROW) network on and around the site, both positive and negative, should be clarified and assessed through the submission, both during the infill period and once restored. The potential for expanding the PROW to provide long term recreational benefits to the public should be explored.



- 4.56 Any wider benefits to sustainable transportation should also be set out in the chapter in terms of facilitating the use of non-vehicle transportation around the area.

### **Archaeology and Cultural Heritage**

- 4.57 The scope of the archaeological chapter set out in the Scoping Request is agreed, but a full description of nearby heritage assets must be included in the ES.
- 4.58 Essential for inclusion in Cultural Heritage Assessment of effect upon its setting is the Chanctonbury Ring Scheduled Monument, an iconic site both for historic landscape and archaeological reasons (National Heritage List no. 105114). Because of its location upon a high point of the top of the scarp slope of the South Downs, the quarry is at present very visible in panoramic views from the north side of the monument. Landscape viewpoints should be taken from across the quarry to Chanctonbury Ring, and from the north and north-west sides of the Ring towards the quarry.
- 4.59 Also on the top of the scarp slope, west of Chanctonbury Ring, are a cross dyke earthwork and two bowl barrows, all Scheduled Monuments. These Monuments should be similarly treated in respect of landscape viewpoints and effects of the proposals upon their settings.
- 4.60 It is stated at 6.7.4 that: *“Because the development of the Quarry under the 2004 Permission (review of old mining permissions) has opened out almost 100% of the extraction area then it is not expected that there will be any buried archaeology remaining to be investigated on site.”* This is likely to be the case for the most part, but it should be borne in mind that in a single site visit c. 1971, when topsoil was stripped from the western part of the quarry before quarrying, Roman pottery was picked up by part-time archaeologists; these finds are most likely to have come out of buried archaeological features.
- 4.61 During quarry edge landscaping as part of the proposed restoration, it is possible that some archaeological features, where present, may be exposed.
- 4.62 In the Cultural Heritage assessment of the EIA, this possible eventuality should be taken into account in considering the archaeological effects of the proposals, and suitable mitigation measures set out.

### **Cumulative and In-Combination Effects**

- 4.63 In addition to the above, and as mentioned in relation to the document structure, the cumulative effects of the development should be included, as well as the in-combination effects (i.e. the potential interaction of impacts - resulting from a combination of effects – such as biodiversity and water impacts) acknowledging the potential for a combination of impacts to result in an impact of greater significance.
- 4.64 The cumulative impacts of the development should take into account approved and allocated development within at least a 5km radius of the site, and consider the potential combined impacts of the proposals. The cumulative impact of the proposal, along with the previous works on site should also be taken into account (the temporal cumulative impact).

## **Climate Change**

- 4.65 The approach to considering climate change impacts on the project, and resulting from the project, is considered appropriate.

## **Population and Human Health**

- 4.66 It is agreed that a quantitative approach to considering the impact on population and human health is appropriate, albeit informed by quantitative details from the other topic chapters.

### Additional Topic

- 4.67 As well as these topics, the following should be scoped in to consideration:

## **Geology and Soils**

- 4.68 Given the site's designation as a Regionally Important Geological and Geomorphological Site, the potential impact on geology should be included, including mitigation measures focused on preserving the RIGS.
- 4.69 The works have the potential to impact on soil quality (excluding contamination), including through poor management and handling of soils on site. This should therefore be assessed, and mitigation measures detailed, if required.
- 4.70 The assessment

### Topics to be Scoped Out

- 4.71 It is agreed that the following topics are unlikely to represent the 'main' or 'significant' environmental effects to which the development is likely to give rise, so can be excluded from detailed consideration in the Environmental Statement:
- Soil and Agricultural Land: other than the hydrogeological assessment set out above, it is considered that the impact on soils can be scoped out of consideration because no additional, greenfield land would be used in the project.
  - Population and Human Health/Socio-Economic Impact: the development does not have the potential to result in significant effects on population and human health or in socio-economic impacts. However, the impact on health resulting from recreation, noise and air quality in particular should be addressed in the transport section (as above re. PROWs) and submitted documents (e.g. the Planning Statement), along with any socio-economic impacts, positive or negative.
  - Material and waste: it is not considered the use of material/production of waste has the potential for a significant effect on the environment that has not already been considered in the topics set out above. It is therefore considered that this can be scoped out of the EIA.
  - Odour: it is agreed that the development would not have the potential for significant odour impacts so this can be scoped out of the EIA.

- Risk of Major Accidents/Disaster: It is not considered there is a high probability of major accidents resulting from the scheme, and certainly not so significant as to warrant inclusion in the EIA. This can therefore be scoped out of the EIA.
- Heat and Radiation: it is not considered the project would result in significant heat/radiation impacts. This can therefore be scoped out of consideration in the EIA.

## 5. Conclusion

- 5.1 As already noted, in accordance with Regulation 18(4) of the EIA Regulations, the submitted ES must be based on this Scoping Opinion (or the most recent Scoping Opinion relating to this project).
- 5.2 It is recommended that in addition to the above, the responses from consultees forwarded to you directly, should be reviewed.

*Signed:*



Jane Moseley  
**Case Officer**

*for the Head of Planning Services*  
*Date: 15 November 2019*

*Signed:*



Chris Bartlett  
**Reviewer**

**APPENDIX 3**

***Approved Concept Restoration Scheme***

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# Rock Common Concept Restoration Proposals

**General**  
 Mineral has been extracted from Rock Common since the 1920s. The majority of the permitted extraction area has been stripped of soils and overburden with mineral subsequently extracted.  
 The Quarry landform and its physical potential for restoration has therefore already been established.  
 The potential for restoring the Site to reflect regional landscape features is therefore limited. The ability to restore locally characteristic scale character features and wildlife habitats appropriate to the Weald / Downland Margin / Wealden Fringe is attainable.

**The Aim**  
 The primary aim of the Concept Restoration Scheme is to create a landscape lake for amenity and nature conservation and to integrate the Site into the surrounding landscape in accordance with West Sussex County Council's Landscape Management Guidelines for Wooded Heath Ridges within the Developed Margins of the Weald / Downland Margin of the Wealden Fringe Margin.  
 Consistent with this Aim, the Concept Restoration Scheme includes the following elements:-

- 1. Topography:**  
 Grading of exposed faces and slopes above water level to enable integration of the restored Site into the surrounding land levels. Specifically:-  
 (a) Within the Mineral Extraction Area the proposal is to create, generally, 50° sand faces down to 42m AOD (above Ordnance Datum) with a 5 metre-wide bench (1 to be used as a circular walkway around the restored lake), followed by 20° slopes to the base of the quarry workings. (Notable exceptions to these profiles would be the existing over-steepened sand faces and Gault Clay overburden slopes - see Drawing Nos. R32B7 & R32D1.)  
 (b) Within the Plant Site Area, the proposal is to merge the area into the adjoining undisturbed ground.
- 2. Landform:**  
 Creation of a central landscaped lake with associated stable landform, using only materials currently available on Site. Through appropriate 'grading' of the quarry margins, the restored landscape will help assimilate the A283 Stonehenge to Washington section of the 'Low Folkstone Sand Ridge Line'.
- 3. Landscape:**  
 Provision of terrestrial and aquatic habitats and land uses to enhance the wildlife and recreational potential of the Site. The proposed scheme will reinforce and complement existing vegetation around the periphery of the Site to strengthen local character. The key landscape types will comprise:  
 (a) Heathland  
 (b) Woodland  
 (c) Open Water
- 4. Vegetation Management and Planting**  
 Other than the Willow / Alder mix required for Gault Clay slope stability, re-creation of local vegetation types appropriate to the Weald Downland Margin / Developed Margins Area, existing vegetation around the Site will be strengthened and 'linked' to the new planting to restore views and strengthen local landscape character. Specific proposals include:  
 (a) Conserve, manage and link existing / proposed heathland and woodland areas.  
 (b) Establish and manage a varied heathland landscape including trees, areas of bare ground, woodland, scrub and wetland.  
 (c) Re-creation and strengthening of the wooded skyline of the south facing ridge within the Mineral Extraction Area (i.e. emphasise the 'Low Folkstone Ridge Line' feature) by sympathetic tree planting.

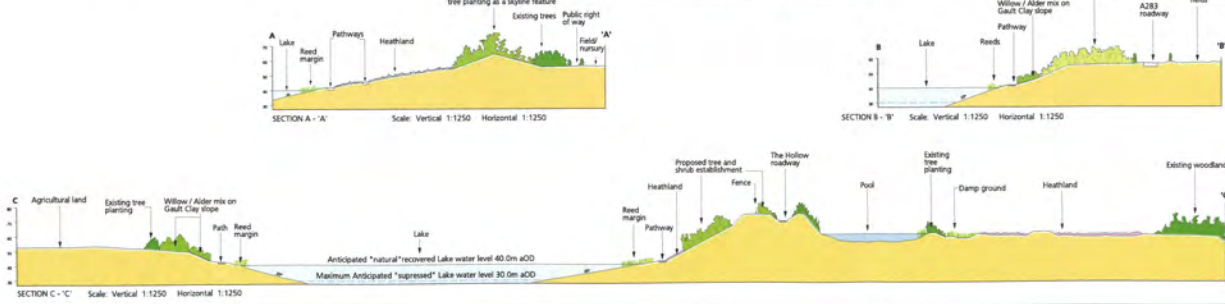
## Developed Margins



Landscape Designations and Identified Character Area



## Schematic Restoration Sections



## Tree and Shrub Planting Proposals

The species mix for the scheme is to take account of the final surface material used for restoration. This relates to the amount and placement area of the Lower Greensand, Gault Clay and Marshall Clay

Broadleaved Woodland		Species	% Mix
Quercus robur	English Oak		30
Betula pendula	Silver Birch		15
Betula pubescens	Downy Birch		15
Ilex aquifolium	Holly		5
Sorbus aucuparia	Rowan		5
Populus tremula	Aspen		5
Fraxinus alnus	Alder Blackthorn		2
Corylus avellana	Hazel		10
Crataegus monogyna	Hawthorn		10
Viburnum opulus	Gelder rose		3
			100%

Broadleaved Woodland Incorporating Evergreen Tree Planting		Species	% Mix
Quercus robur	English Oak		25
Betula pendula	Silver Birch		20
Pinus sylvestris	Scots Pine		15
Sorbus aucuparia	Rowan		15
Crataegus monogyna	Hawthorn		15
Viburnum opulus	Gelder rose		10
			100%

Trees and shrubs to be planted at 2 metre centres to achieve a gross 2500 stems / hectare in single species groups of 5 to 10 with shrub groups on margins.  
 Oaks to be protected in 1.5 metre high shelters. All other stock to be protected in 0.8 metre high shelters.

## Willow / Alder Mix on Gault Clay Slopes

Grass Seeding of the Gault Clay shall be undertaken as early as possible in order to establish an initial vegetation cover prior to final tree planting. (See Drawing No. R32 / 91)

The final tree planting mix shall include:

Alnus glutinosa	Alder
Alnus incana	Grey Alder
Salix caprea	Goat Willow
Salix cinerea	Grey Willow
Salix viminalis	Oslar

## Scrub Heathland Establishment

A heathland habitat is to be established around the periphery of the proposed lake and also within the restored Plant Site Area. This heathland is to comprise a mosaic of localized heath grassland, and bare ground, including dry, wet and bog heath species. The location of the habitats will be dependent upon the restoration material used, i.e. dry heath on the Lower Greensand, wet and bog heath on the backfilled clay lake margins.

## Target Heathland Habitat Species

- |                  |                      |
|------------------|----------------------|
| <b>Dry Heath</b> | Dwarf gorse          |
|                  | Heather              |
|                  | Bell heather         |
|                  | Broom                |
| <b>Wet Heath</b> | Purple Moor Grass    |
|                  | Heath rush           |
|                  | White beak sedge     |
|                  | Cross leaved heath   |
| <b>Bog Heath</b> | Sphagnum moss        |
|                  | Bulbous rush         |
|                  | Round leaved sundew  |
|                  | Oblong leaved sundew |

Invasive species, including birch and bracken will be discouraged from encroaching into the heathland scrub.

## Legend

- Rock Common Quarry Site Boundary and Company Landholdings
- Existing tree planting / woodland
- Section positions
- The Rough / Windmill Landfill Development
- Surrounding land
- Existing stream/pool
- Existing Public Rights of Way

## Restoration Proposals

- Broadleaved Woodland Incorporating Evergreen Tree Planting
- Broadleaved Woodland
- Scrub Heathland Establishment
- Willow / Alder Mix on Gault Clay Slopes
- Rock faces
- Restored Lake (Margins protected from wave erosion by ironstone rejects, placed as appropriate)
- Indicative locations of reed and aquatic marginal species
- Access track

**PLEYDELL SKIDMAN** INCORPORATED IN ENGLAND  
 Project: Smithyman Ltd  
 Governor House, Highwayside Road,  
 Central Park, Telford, Shropshire TF12 9TW

**Drawing Office Services**  
 Tarmac Limited, Millfield Road,  
 (Bishopthorpe), Wetherhampton,  
 WYV 6LP  
 Tel: +44(0)1902 882215  
 Fax: +44(0)1902 494511  
 www.tarmac.co.uk

**Tarmac**  
 Tarmac Southern Ltd  
 A member of the Anglo American plc group

**Rock Common**  
**Concept Restoration Scheme**

Drawn By: R.L.S / A.C.J. Scale: 1 : 2000  
 Date: January 2004 Drawing No: R32 / 86

## **APPENDIX 4**

### ***Application and Phased Working and Restoration Drawings***

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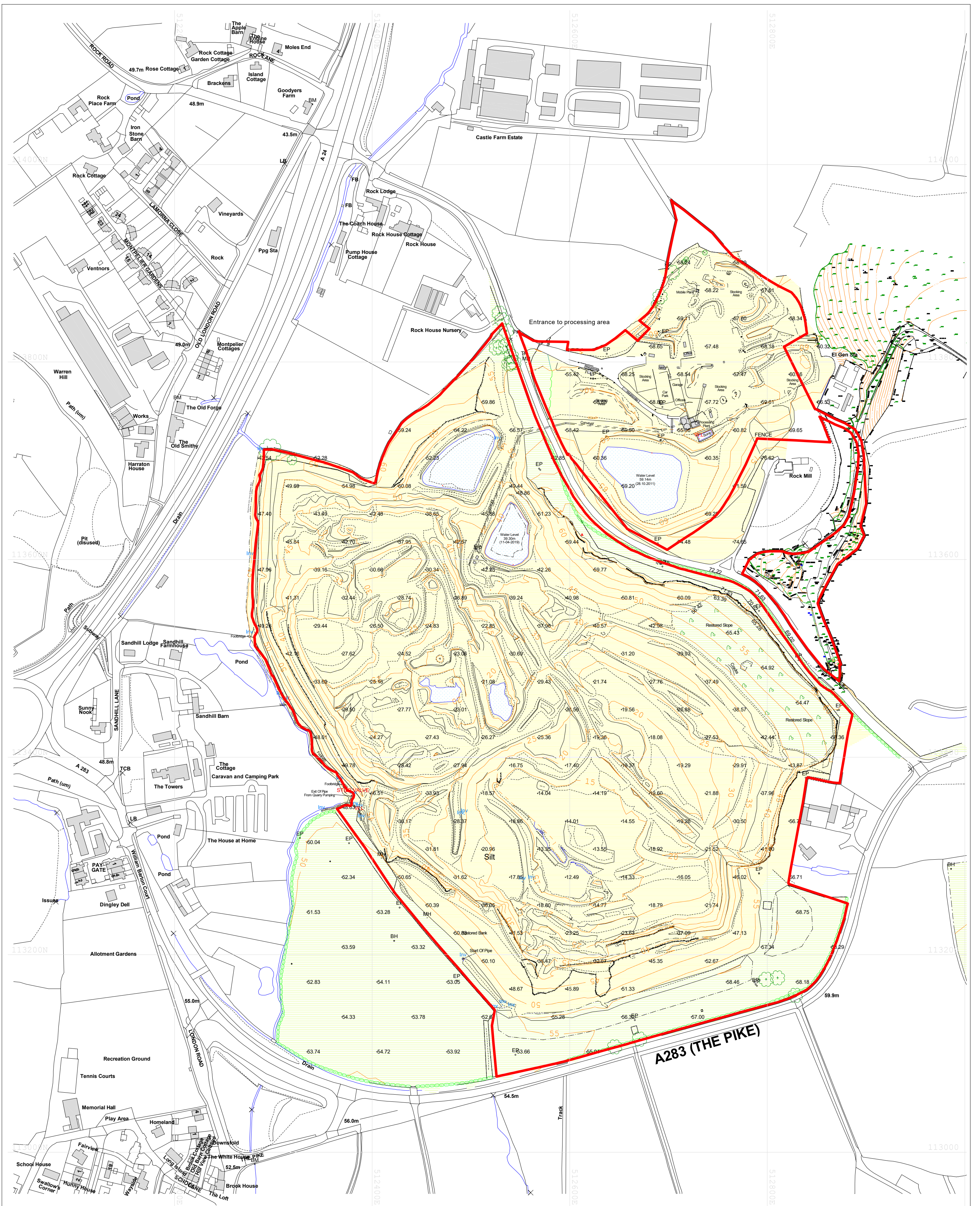


# DRAWING REGISTER

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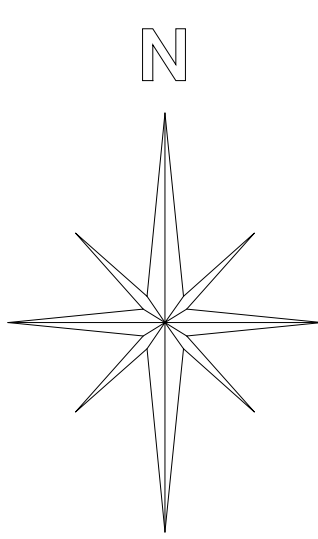
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DRCL/RCRA/20-02	June 2021	Location Plan
DRCL/RCRA/20-03	June 2021	Site Context Plan
DRCL/RCRA/WP-01	June 2021	Topographic Plan (April 2019)
DRCL/RCRA/WP-02	June 2021	Layout of proposed material reception area
DRCL/RCRA/WP-02A	June 2021	Layout of proposed material reception area - Elevations
DRCL/RCRA/WP-03	June 2021	Restoration Material Handling Area
DRCL/RCRA/WP-04	June 2021	Phase 1: Restoring to 15 metres AOD
DRCL/RCRA/WP-05	June 2021	Phase 2: Restoring to 25 metres AOD
DRCL/RCRA/WP-06	June 2021	Phase 3: Restoring to 35 metres AOD
DRCL/RCRA/WP-07	June 2021	Phase 4: Restoring middle and southern areas to final levels
DRCL/RCRA/WP-08	June 2021	Phase 5: Restoring to 35 metres AOD
DRCL/RCRA/WP-09	June 2021	Phase 6: Restoring to 45 metres AOD
DRCL/RCRA/WP-10	June 2021	Phase 7: Restoring to final landform
DRCL/RCRA/WP-11	June 2021	Final Restoration
DRCL/RCRA/WP-12	June 2021	Cross Sections
DRCL/RCRA/WP-13	June 2021	Layout of sand processing area
DRCL/RCRA/WP-13A	June 2021	Layout of sand processing area - Elevations
DRCL/RCRA/WP-14	June 2021	Areas of remaining sand reserves
LLD1955-LAN-DWG-001	Dec 2020	Landscape Masterplan Strategy (Illustrative)





Legend:  
 Application Area

REVISIONS		
Date	Description	By
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11/06/21	Issue for comment	MM
11/06/21	Issue for comment	MM
11/06/21	Issue for comment	MM



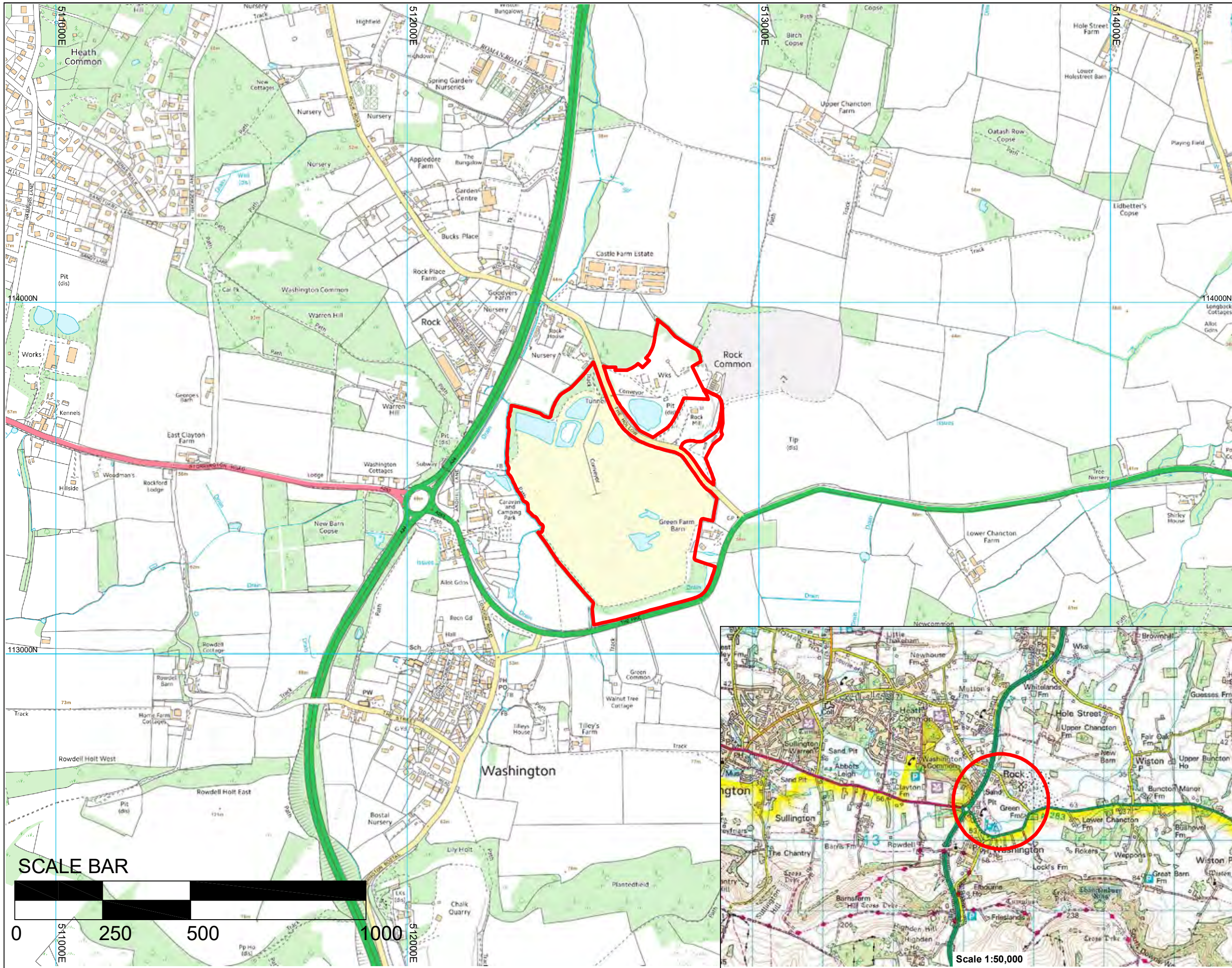
**TERRESTRIA LIMITED**  
 TERRESTRIA LIMITED  
 T/A Mgm Consulting  
 6 Engine Mews,  
 Hampton-in-Arden,  
 Solihull  
 B92 0AZ  
 Mob - 07712779525  
 e-mail - mick@terrestria.co.uk

Client  
**DUDMAN ROCK COMMON LIMITED**

Job Title  
 Rock Common Quarry  
 Project Title  
 Planning application to vary approved restoration  
 Scale: 1:2500 Date: June 2021 Drawn by: SW Checked by: MM

Dwg. title  
**Application Plan**  
 DWG No.  
**DRCL/RCRA/20-01**

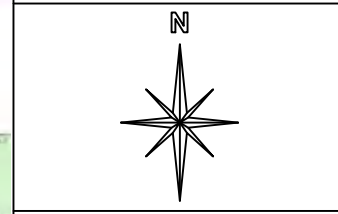




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**Legend:**

Application Area



TERRESTRIA LIMITED

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Client  
**DUDMAN ROCK COMMON LIMITED**

Job Title  
**ROCK COMMON QUARRY**

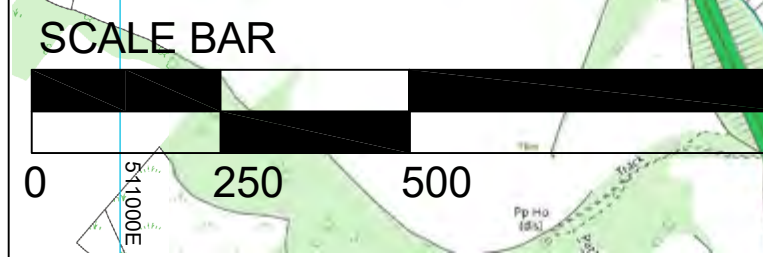
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Planning application to vary approved restoration

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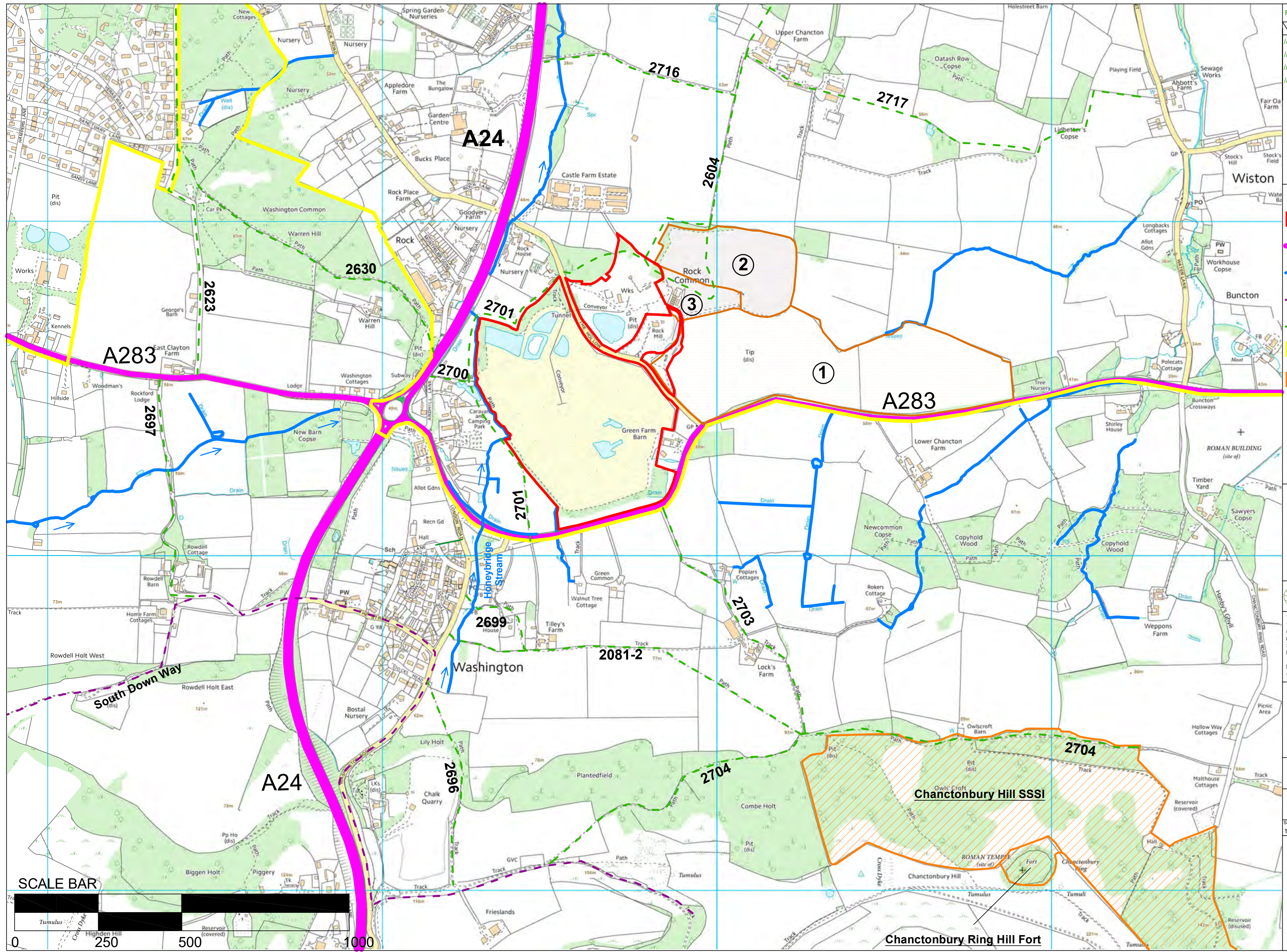
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**Location plan**

DWG No:  
**DRCL/RCRA/20-02**

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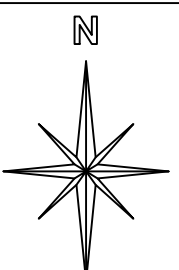






REVISIONS		
Date	Description	By

- Legend:**
- Application Area
  - Main roads
  - Watercourses
  - South Downs Way
  - 2755 Public footpaths
  - South Downs National Park
  - Chanctonbury Hill SSSI
  - 1 Windmill Landfill
  - 2 Rough Landfill
  - 3 Rock Landfill



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Client  
**DUDMAN ROCK COMMON LIMITED**

Job Title  
**Rock Common Quarry**

Project Title  
**Planning application to vary approved restoration**

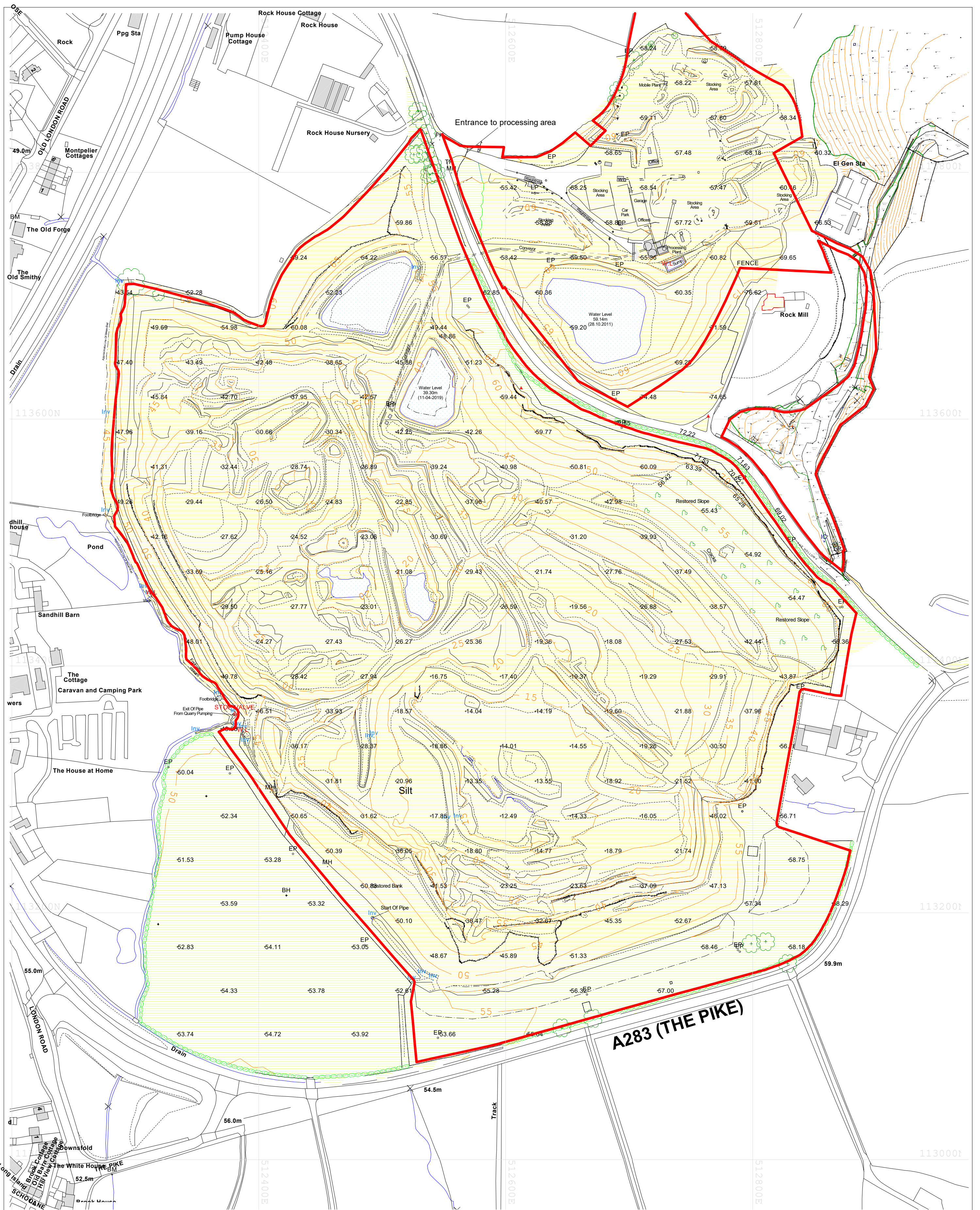
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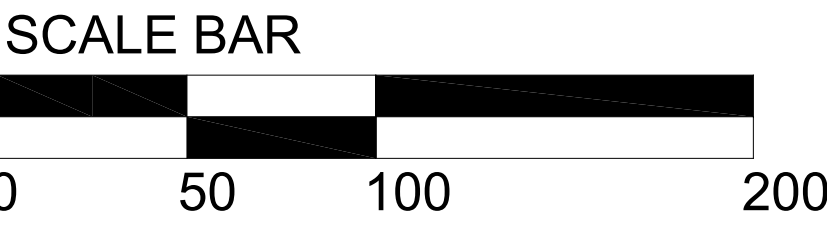
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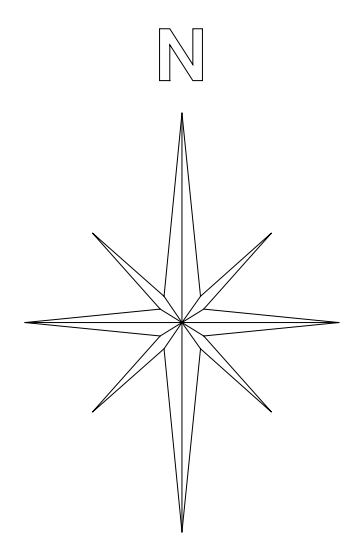




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 Application Area



REVISIONS		
Date	Description	By
11/04/2019	Initial Issue	MM
11/04/2019	Revised	MM
11/04/2019	Revised	MM
11/04/2019	Revised	MM



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Client  
**DUDMAN ROCK COMMON LIMITED**

Job Title  
 Rock Common Quarry

Project Title  
 Planning application to vary approved restoration

Scale	Date	Drawn by	Checked
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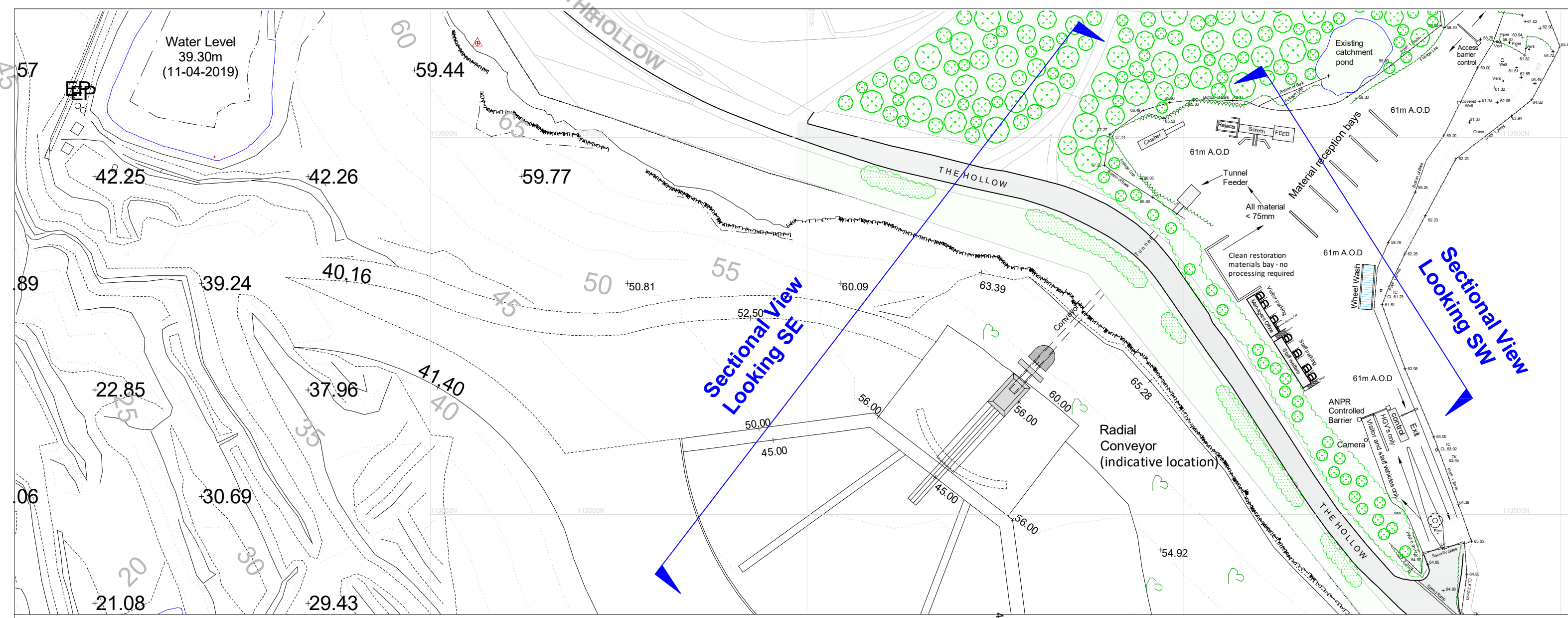
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**Topographic Plan (April 2019)**

DWG No.  
**DRCL/RCRAWP-01**





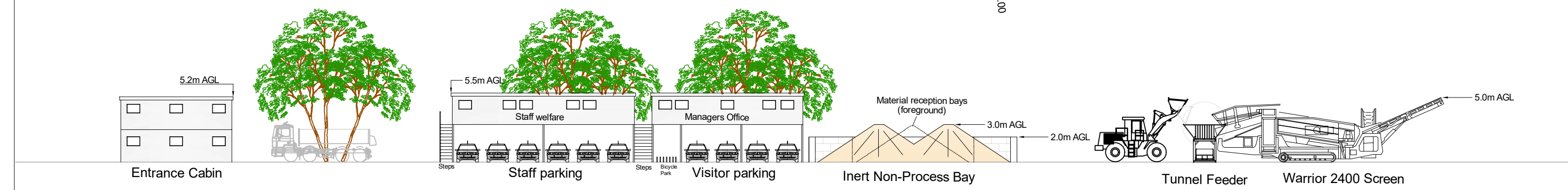




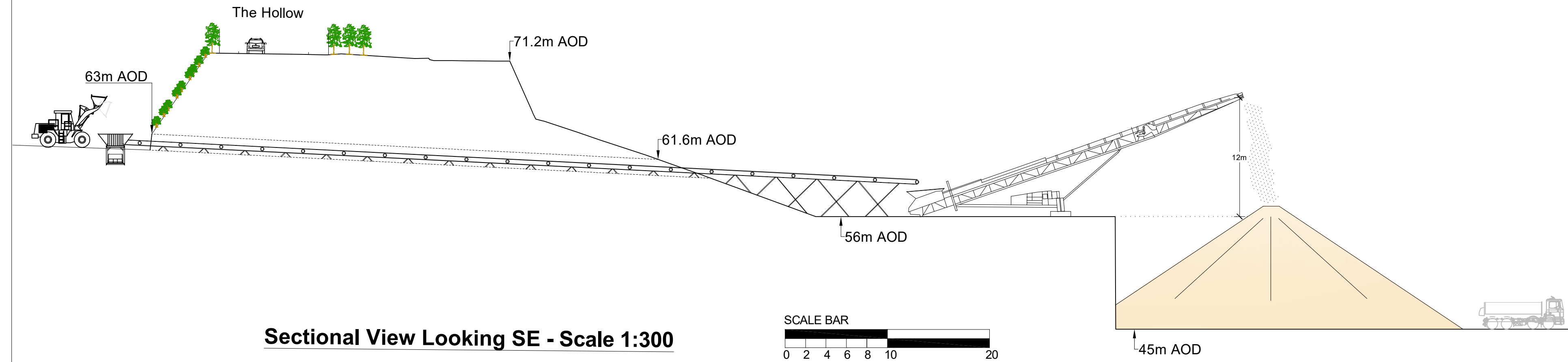
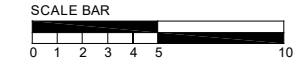
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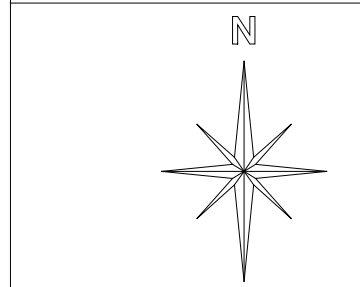
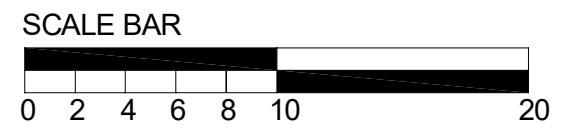
Legend:



**Sectional View Looking SW - Scale 1:300**



**Sectional View Looking SE - Scale 1:300**



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e-mail - mick@terrestria.co.uk

Client  
**DUDMAN ROCK COMMON LIMITED**

Job Title  
**Rock Common Quarry**

Project Title  
**Planning application to vary approved restoration**

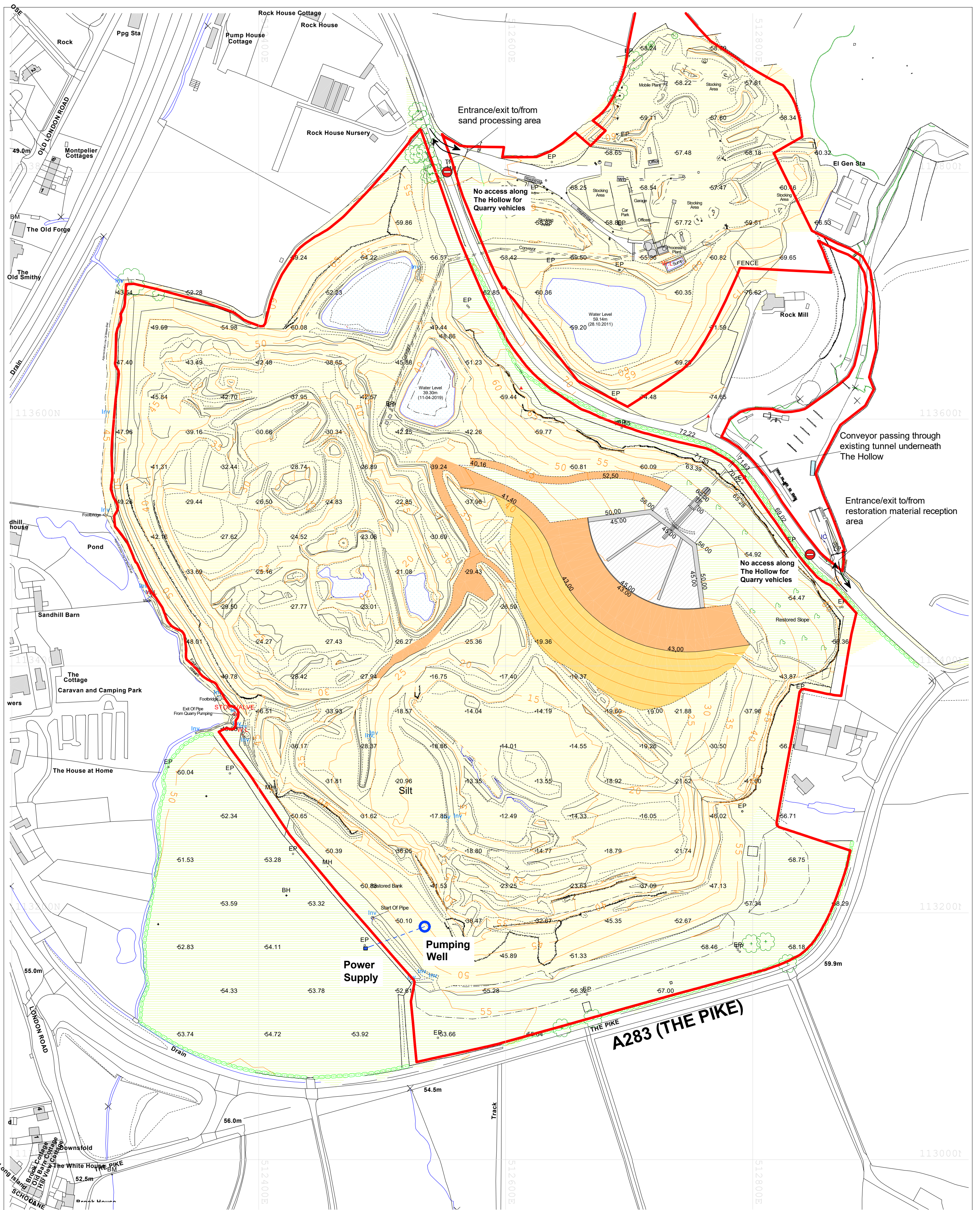
Scale	Date	Drawn by	Checked
1:500@A2	June 2021	SW	MM

Dwg. title  
**Layout of proposed restoration material reception area - Elevations**

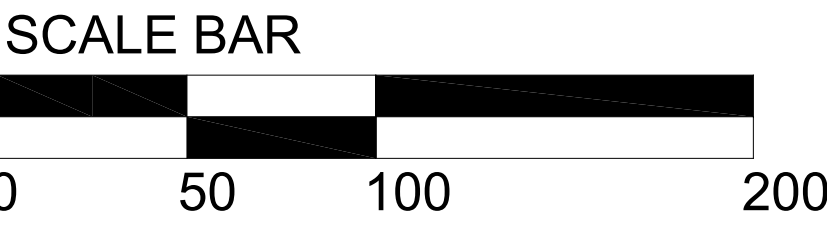
DWG No.  
**DRCL/RCRAWP-02A**

PLOT SIZE: A1. PLOT SCALE: 1:TYPE SCALE HERE

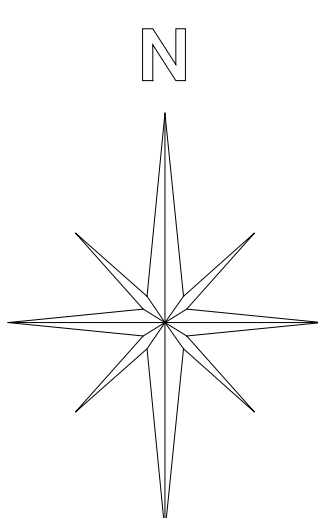




Legend:  
 Application Area



REVISIONS		
Date	Description	By
///	///	///
///	///	///
///	///	///



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Job Title  
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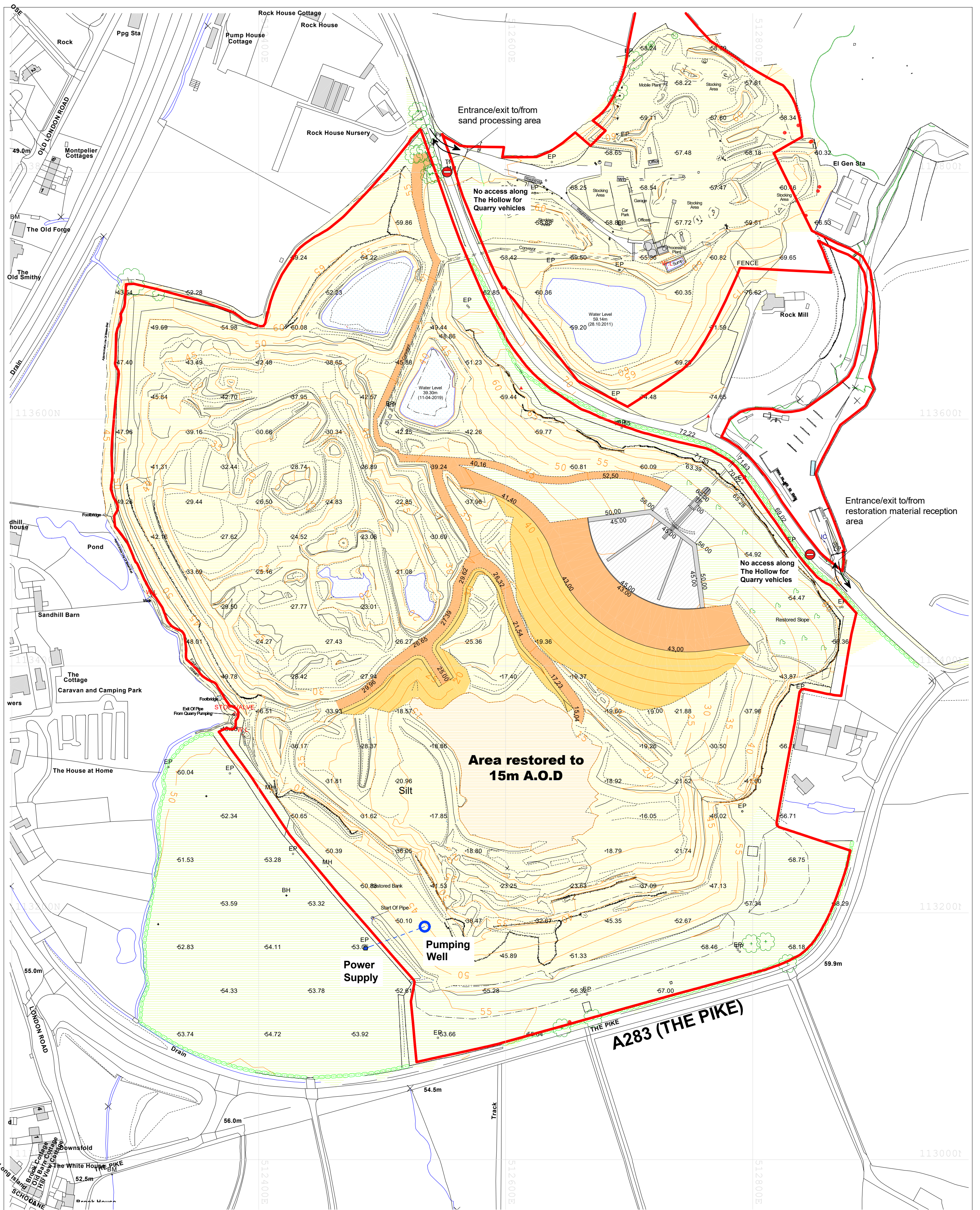
Project Title  
 Planning application to vary approved restoration

Scale	Date	Drawn by	Checked
1:2000	June 2021	SW	MM

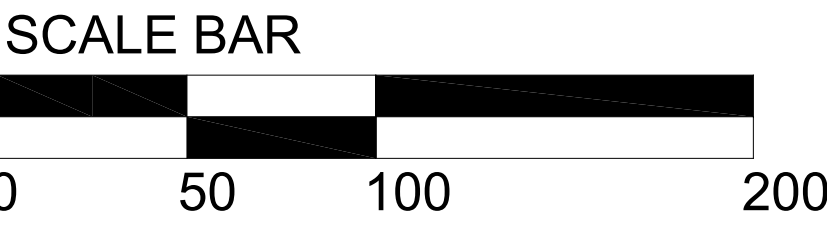
Dwg. title  
 Restoration material handling area

DWG No.  
**DRCL/RCRAWP-03**

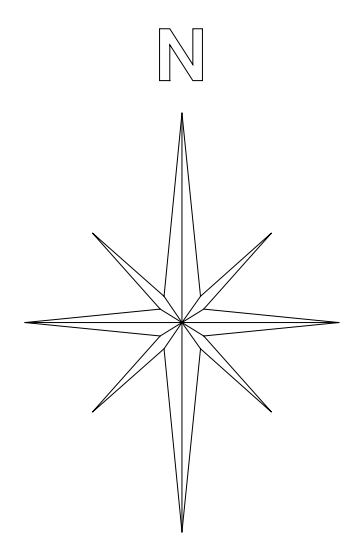




Legend:  
 Application Area



REVISIONS		
Date	Description	By
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///	///	///
///	///	///



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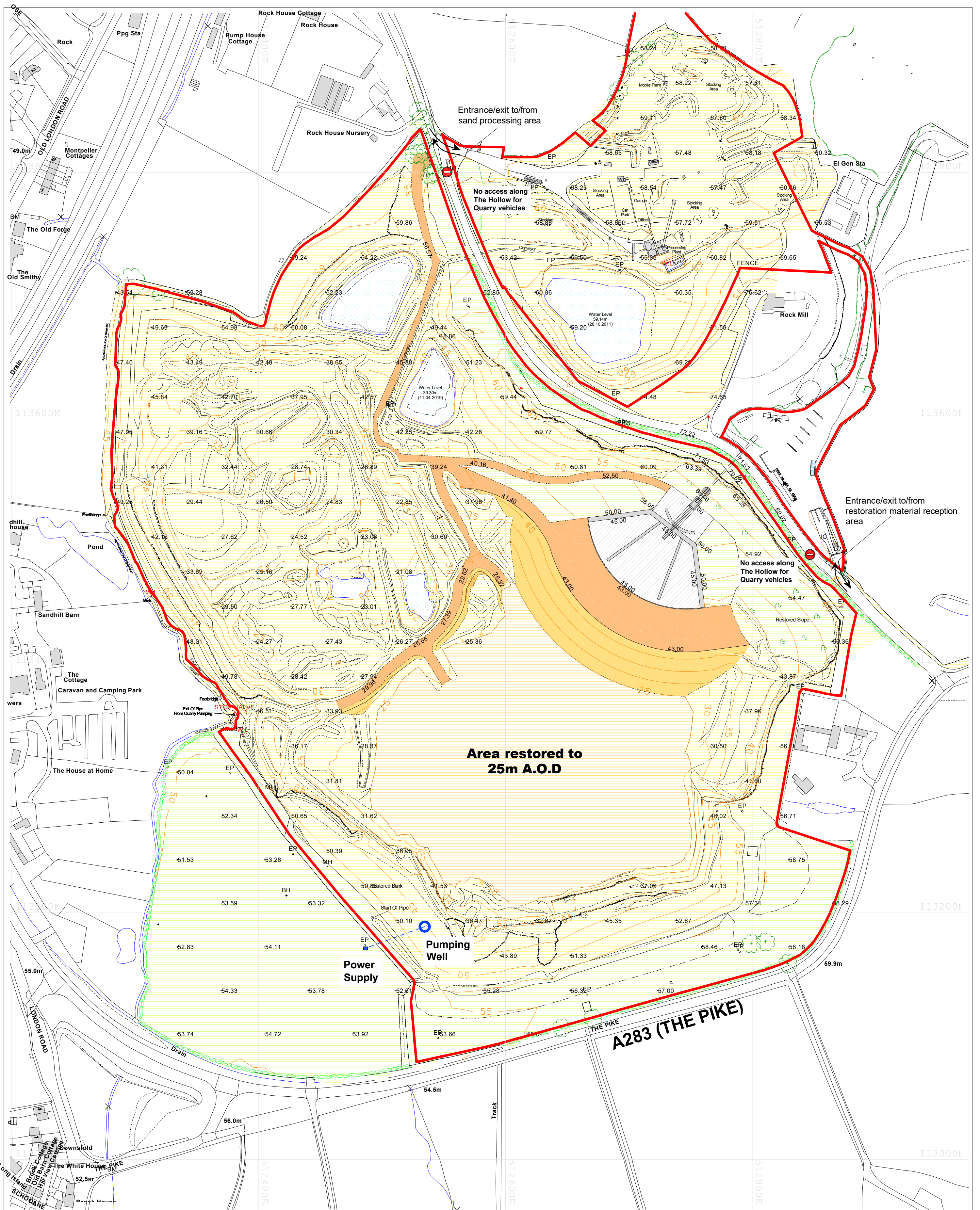
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 Planning application to vary approved restoration

Scale: 1:2000 Date: June 2021 Drawn by: SW Checked by: MM

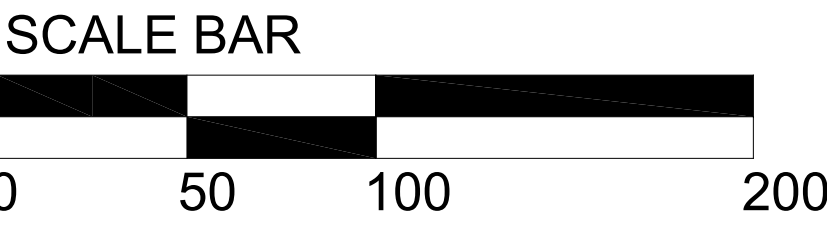
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**Phase 1**  
 Restoring to 15 metres AOD

DWG No.  
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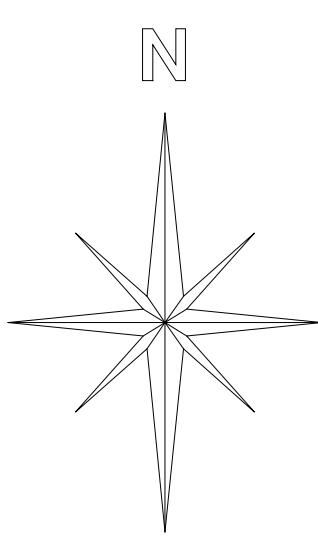




Legend:  
 Application Area



REVISIONS		
Date	Description	By



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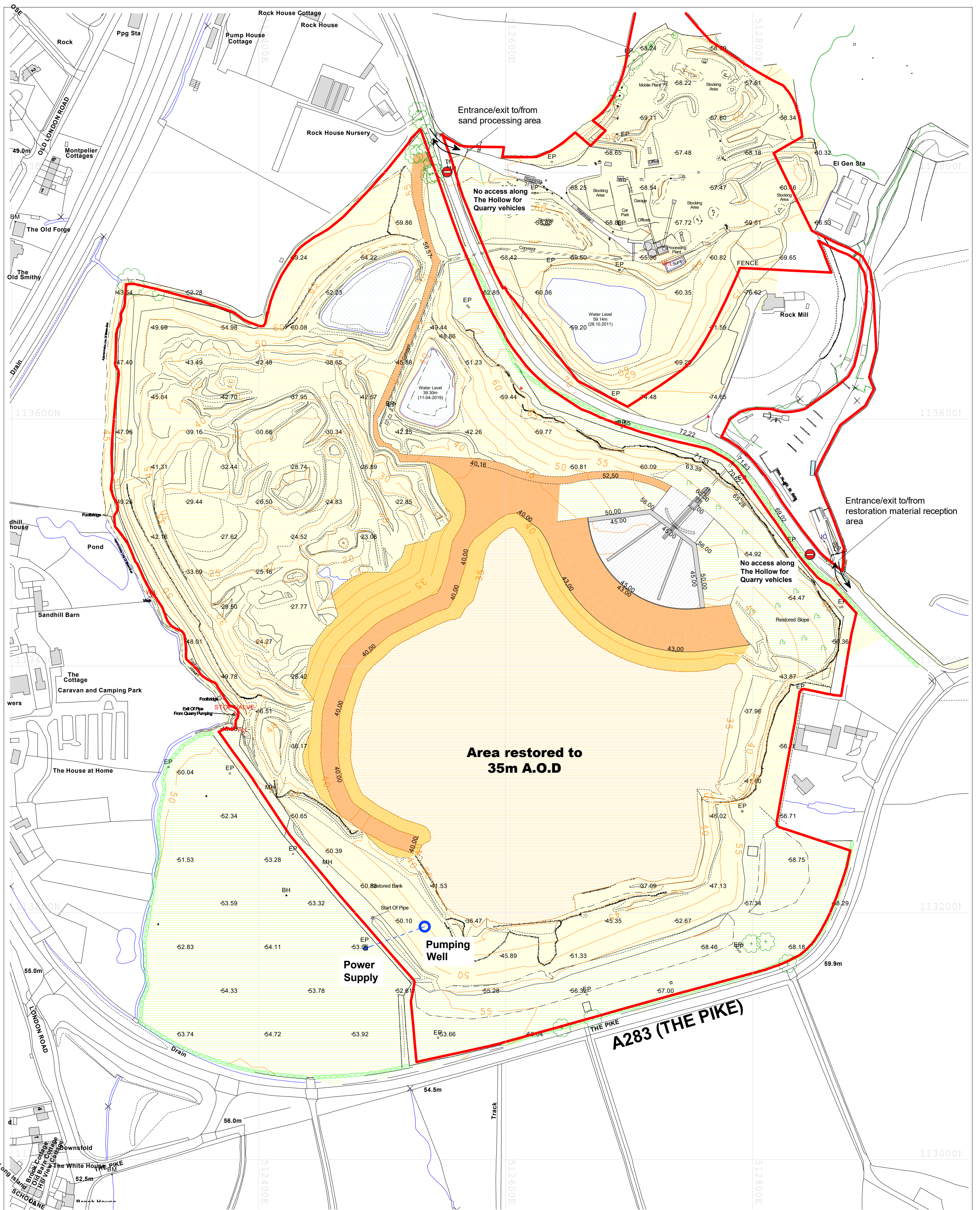
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 Planning application to vary approved restoration

Scale: 1:2000 Date: June 2021 Drawn: SW Checked: MM

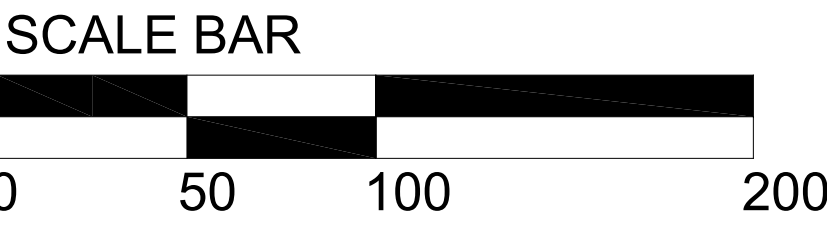
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**Phase 2  
 Restoring to 25 metres AOD**

DWG No.  
**DRCL/RCRAWP-05**

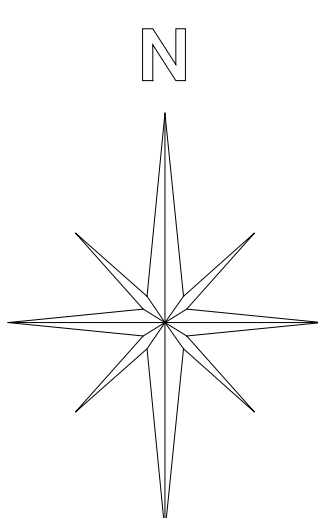




Legend:  
 Application Area



REVISIONS		
Date	Description	By
11/06/21	Issue for planning	MM
11/06/21	Issue for planning	SW
11/06/21	Issue for planning	MM



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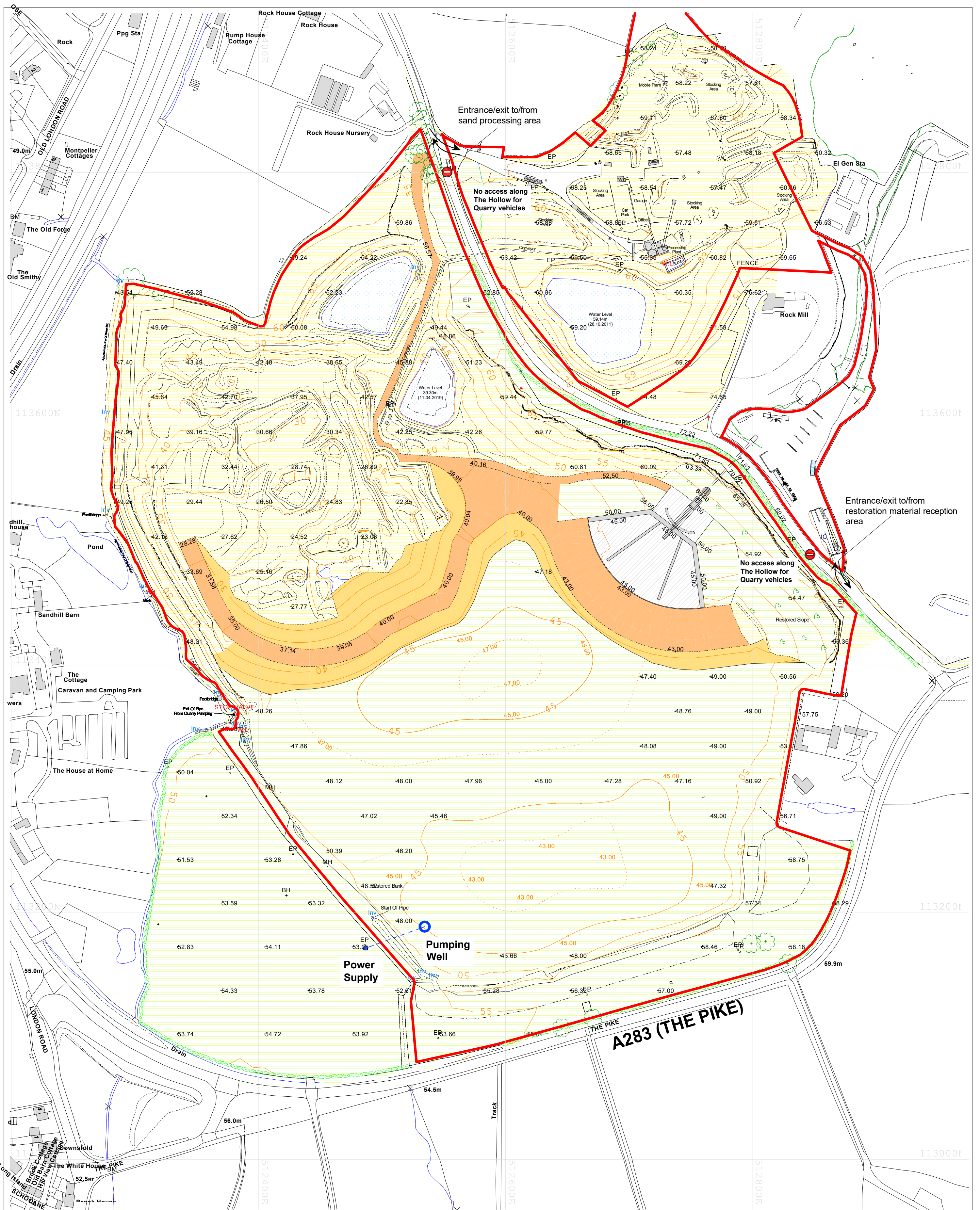
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 Planning application to vary approved restoration

Scale: 1:2000 Date: June 2021 Drawn: SW Checked: MM

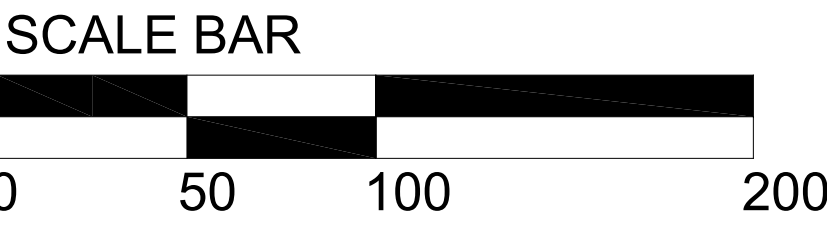
Dwg. title  
**Phase 3  
 Restoring to 35 metres AOD**

DWG No.  
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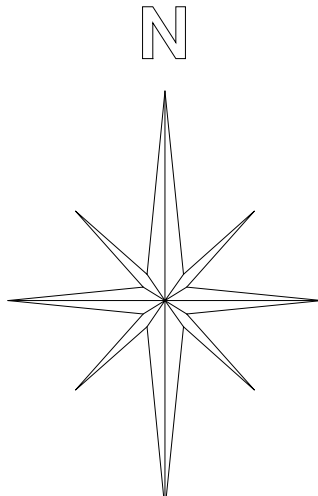




Legend:  
 Application Area



REVISIONS		
Date	Description	By
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///	///	///
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Job Title  
 Rock Common Quarry

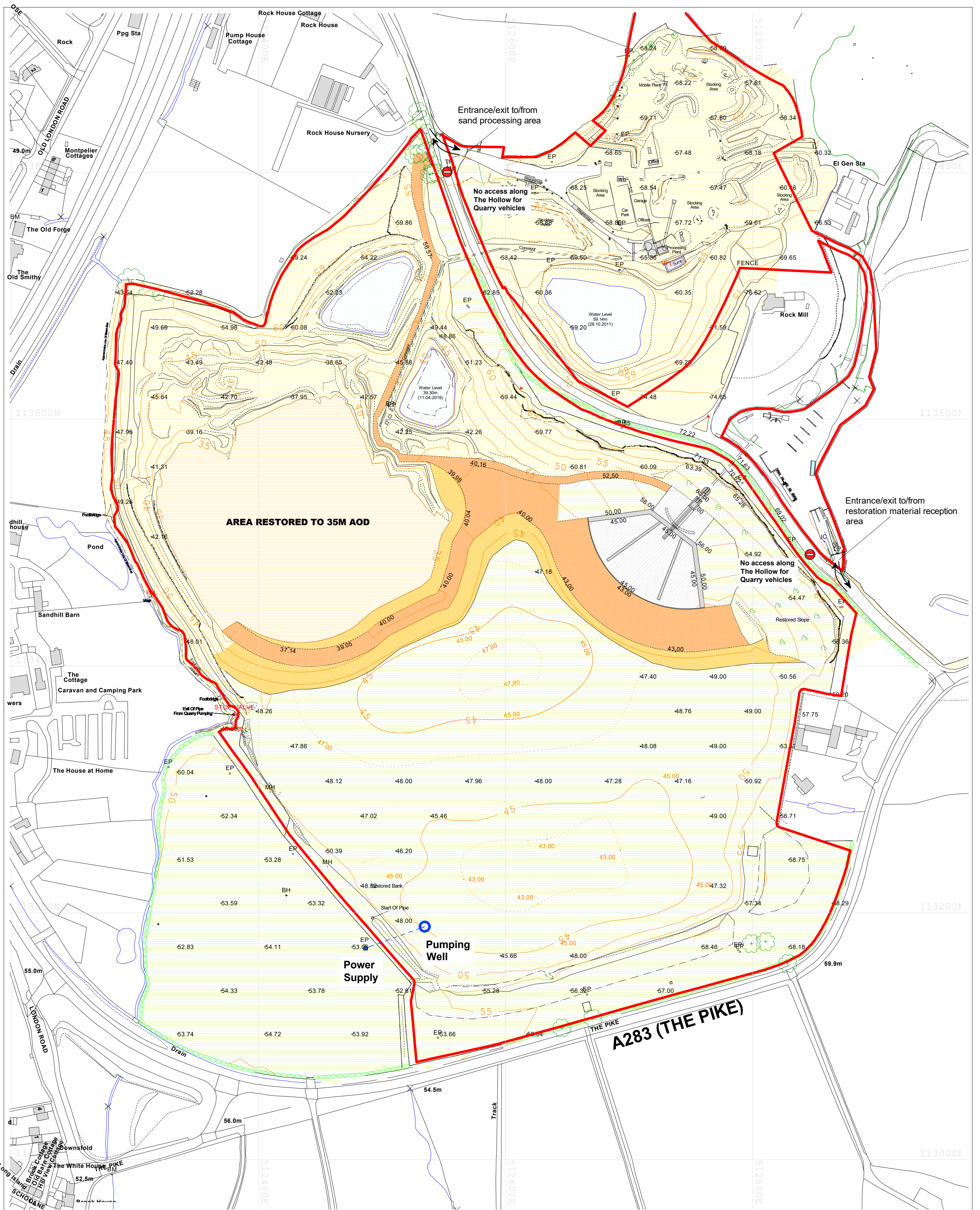
Project Title  
 Planning application to vary approved restoration

Scale	Date	Drawn	Checked
1:2000	June 2021	SW	MM

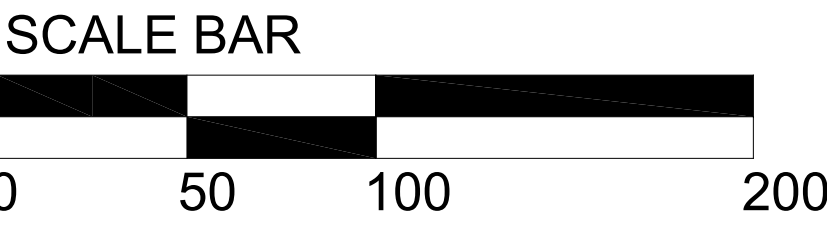
Dwg. title  
**Phase 4**  
 Restoring middle and southern areas to final levels

DWG No.  
**DRCL/RCRAWP-07**

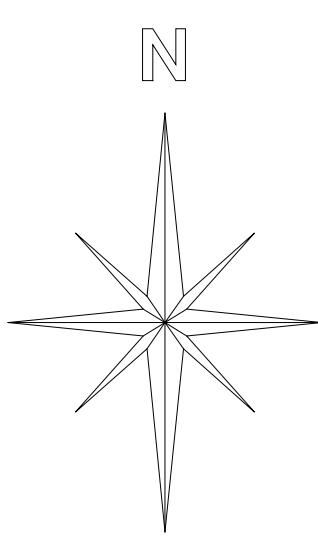




Legend:  
 Application Area



REVISIONS		
Date	Description	By
11/06/21	Issue for planning	MM
11/06/21	Issue for planning	SW
11/06/21	Issue for planning	MM



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Job Title  
 Rock Common Quarry

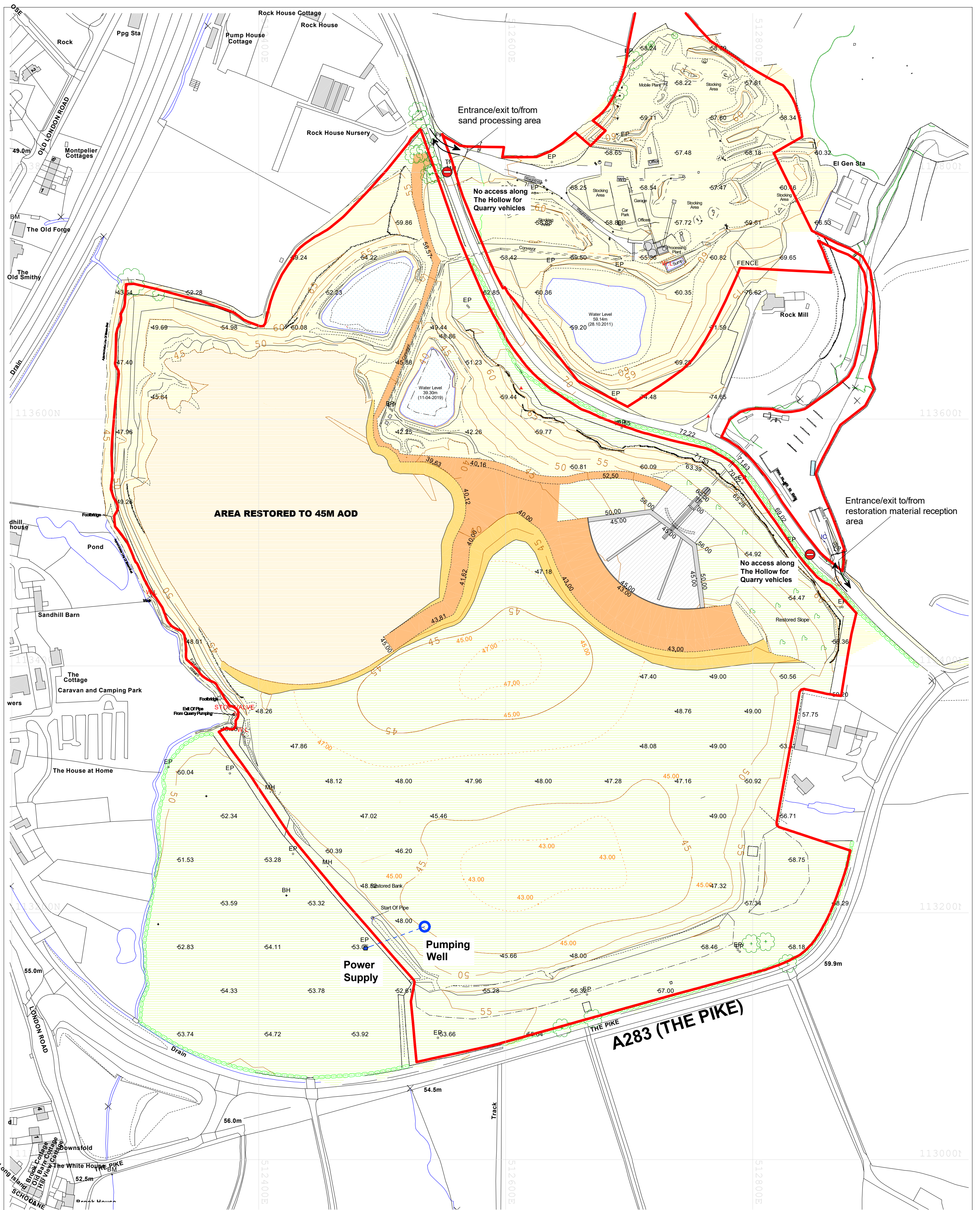
Project Title  
 Planning application to vary approved restoration

Scale: 1:2000 Date: June 2021 Drawn by: SW Checked by: MM

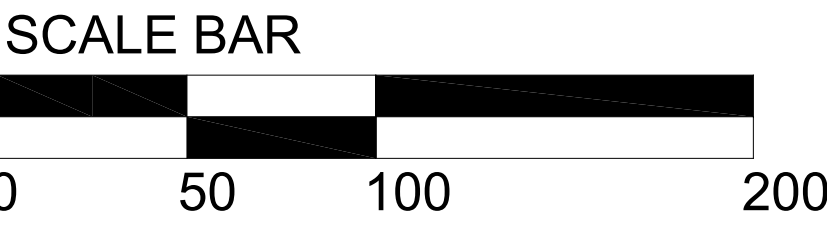
Dwg. title  
**Phase 5  
 Restoring to 35m AOD**

DWG No.  
**DRCL/RCRAWP-08**

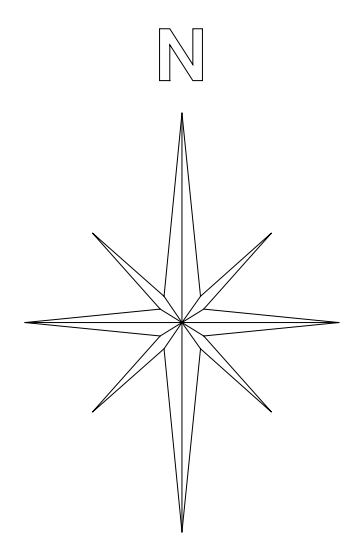




Legend:  
 Application Area



REVISIONS		
Date	Description	By
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///	///	///
///	///	///



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Job Title  
 Rock Common Quarry

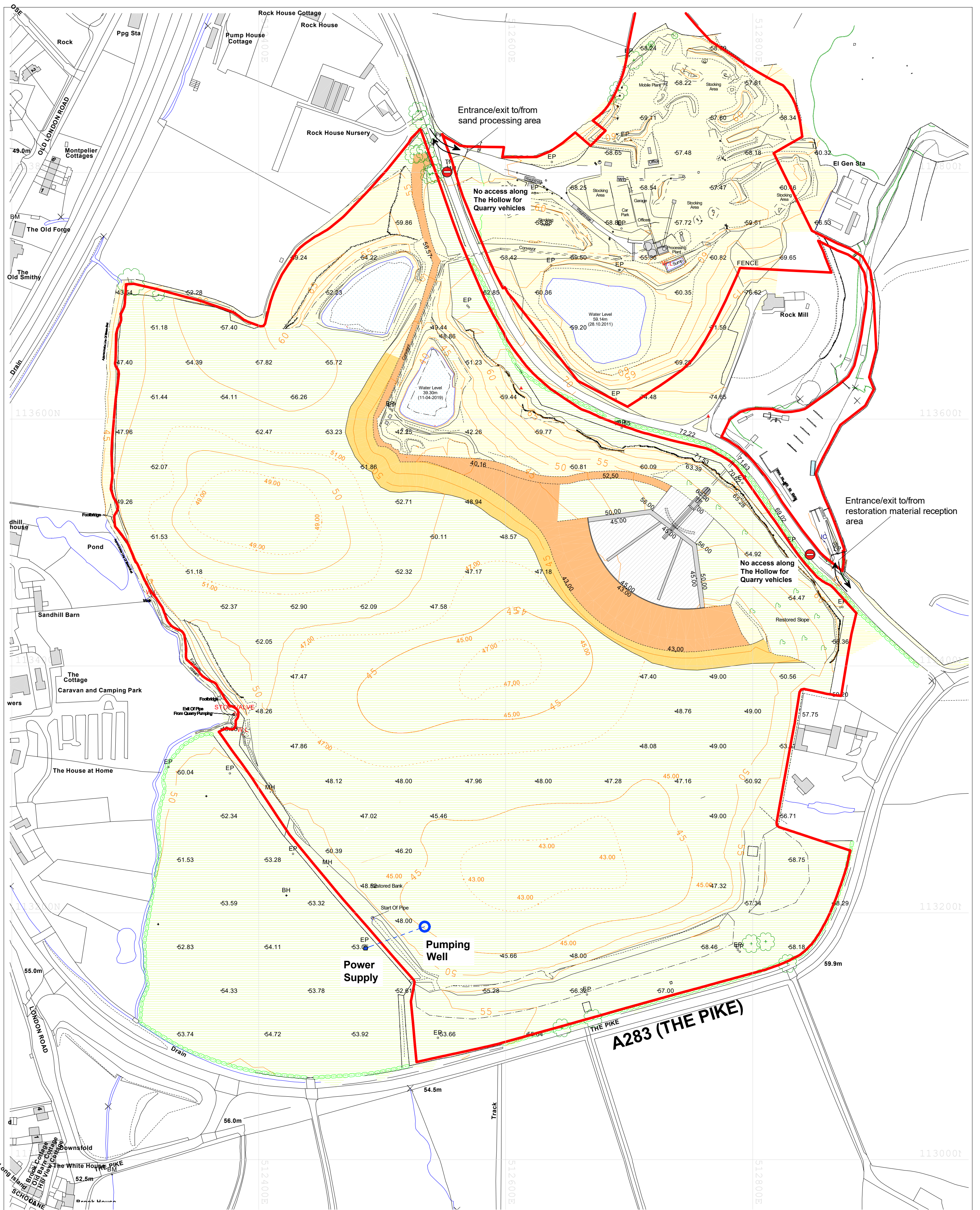
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 Planning application to vary approved restoration

Scale: 1:2000 Date: June 2021 Drawn by: SW Checked by: MM

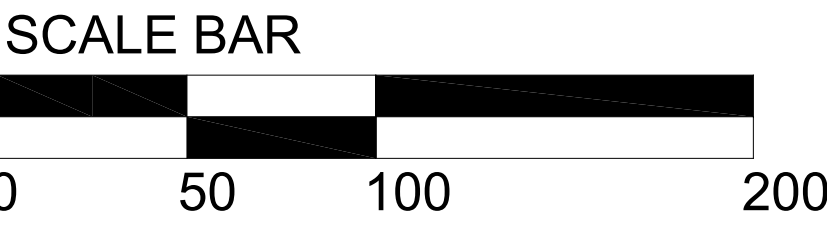
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**Phase 6  
 Restoring to 45m AOD**

DWG No.  
**DRCL/RCRAWP-09**

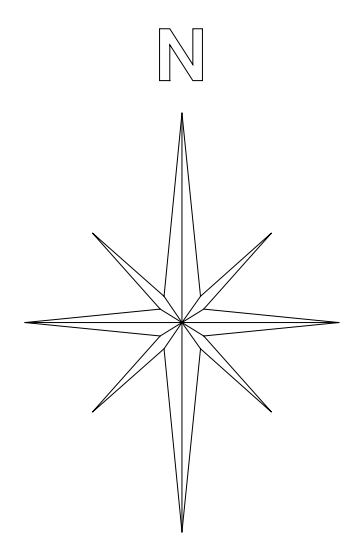




Legend:  
 Application Area



REVISIONS		
Date	Description	By
11/06/21	Issue for planning	MM
11/06/21	Issue for planning	SW
11/06/21	Issue for planning	MM



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Job Title  
 Rock Common Quarry

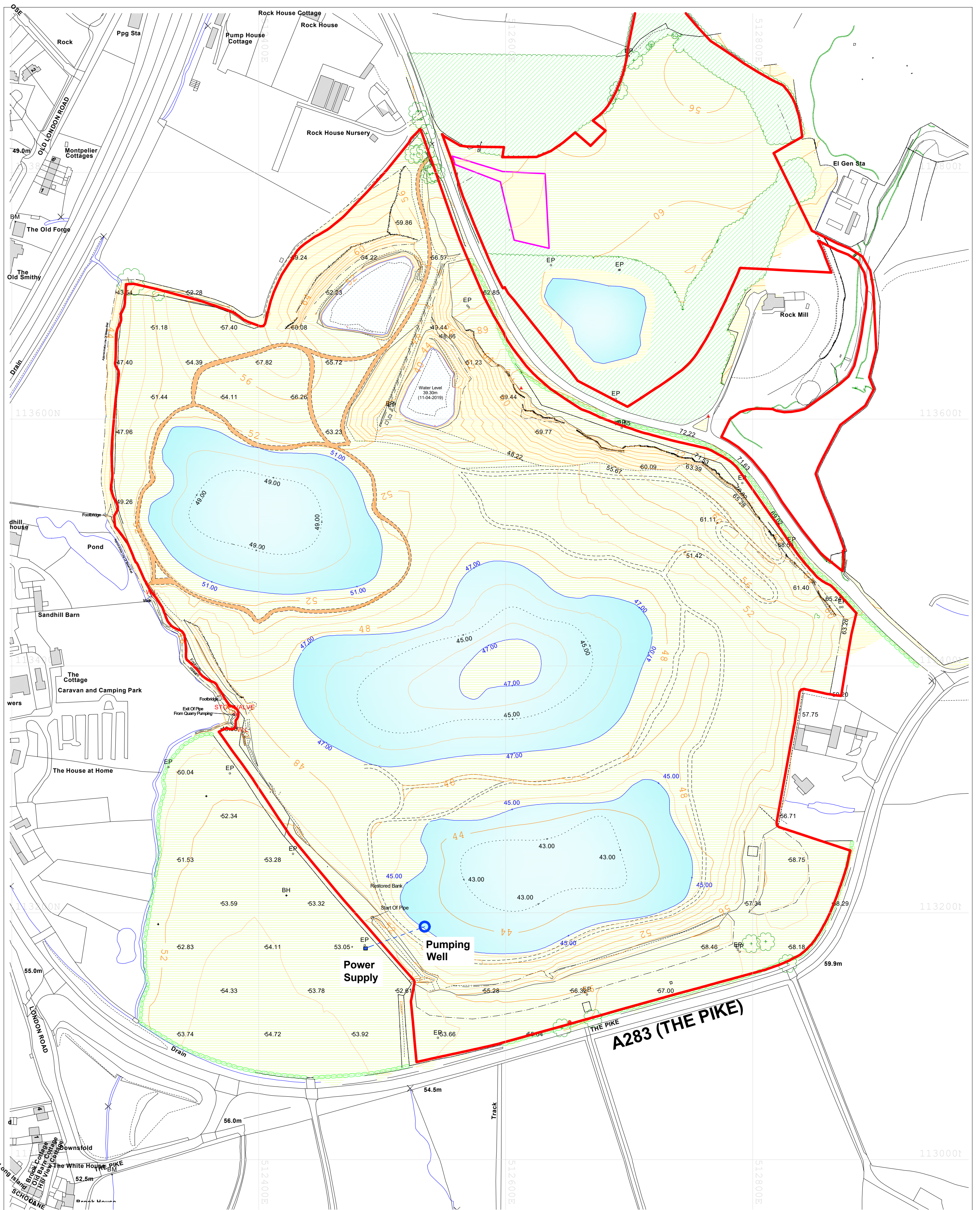
Project Title  
 Planning application to vary approved restoration

Scale: 1:2000    Date: June 2021    Drawn by: SW    Checked by: MM

Dwg. title  
**Phase 7**  
 Restoring to final landform

DWG No.  
**DRCL/RCRAWP-10**





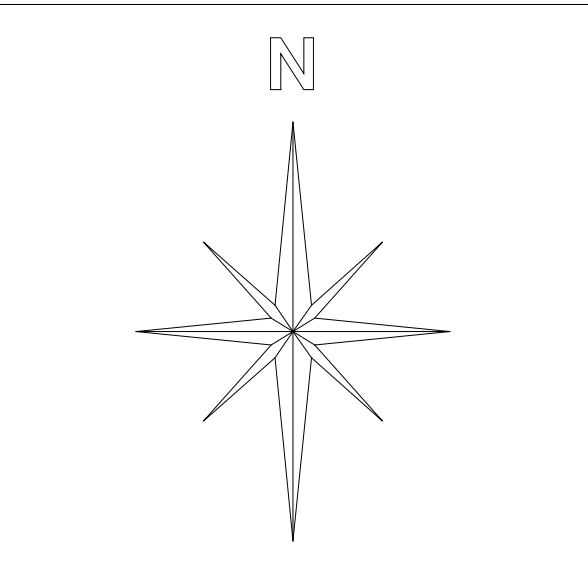
**Legend:**

- Application Area
- Footpath for informal public access
- Private use access for maintenance and habitat management
- Retained hardstanding/site maintenance area

The final routing of footpaths both for informal public access and for private use may change subject to consultation during the application process

**SCALE BAR**

REVISIONS		
Date	Description	By
11/06/21	Final	MM
11/06/21	Final	SW
11/06/21	Final	SW



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**DUDMAN ROCK COMMON LIMITED**

Job Title  
Rock Common Quarry

Project Title  
Planning application to vary approved restoration

Scale	Date	Drawn by	Checked
1:2000	June 2021	SW	MM

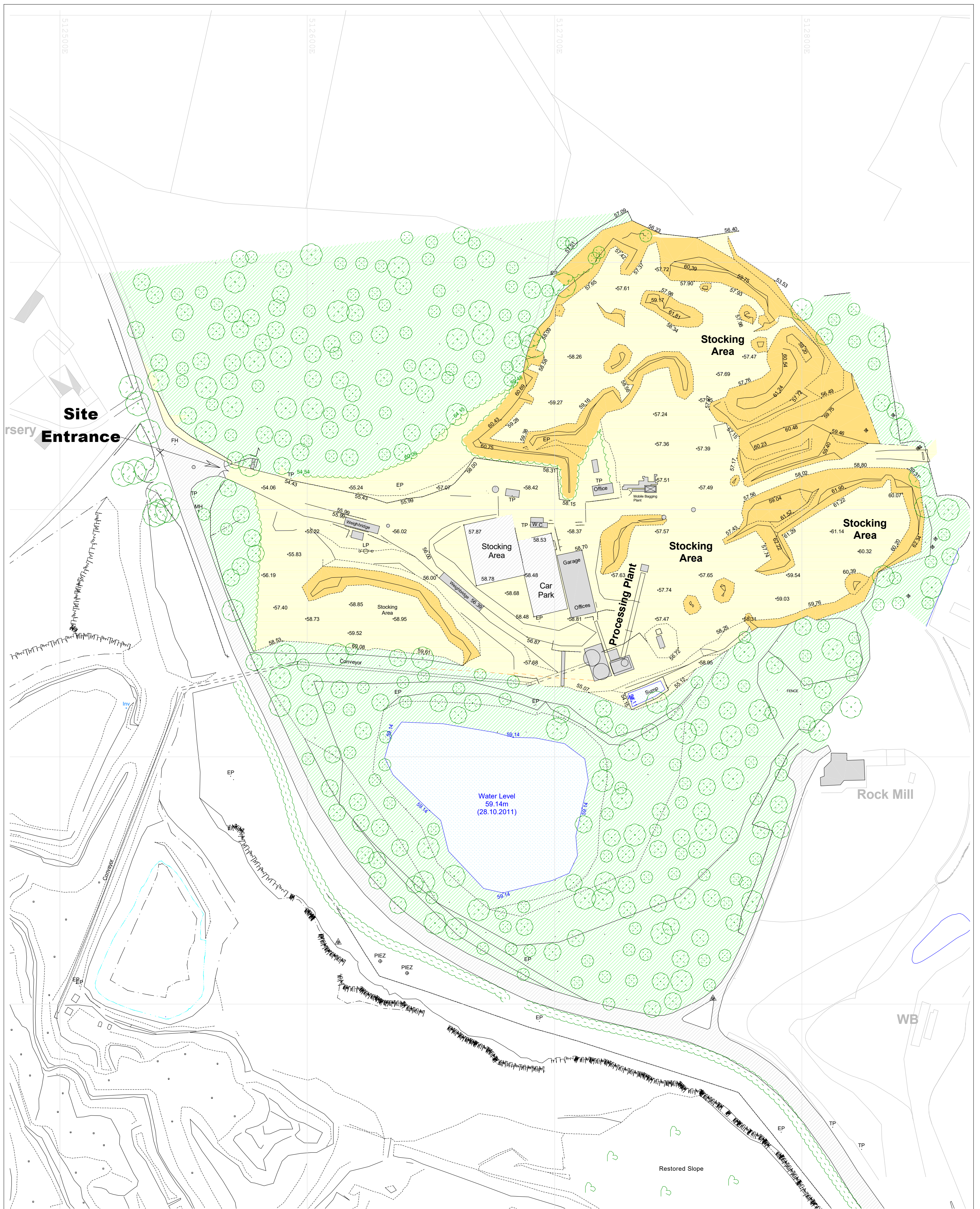
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**Final restoration**

DWG No.  
**DRCL/RCRAWP-11**



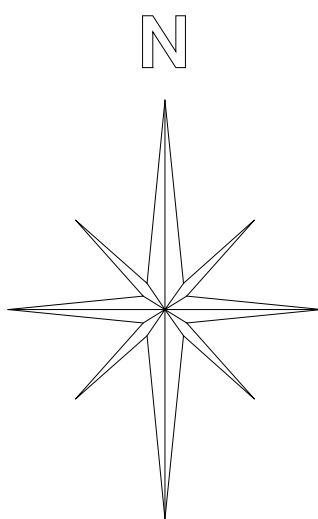






Legend:

REVISIONS		
Date	Description	By
11/11		
11/11		
11/11		



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**DUDMAN ROCK COMMON LIMITED**

Job Title  
**Rock Common Quarry**

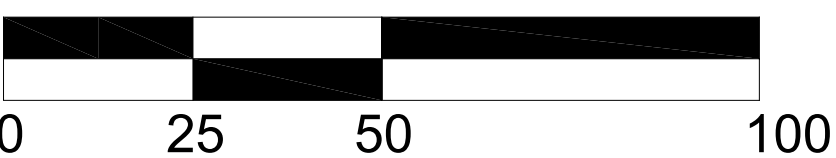
Project Title  
**Planning application to vary approved restoration**

Scale: 1:1000@A2 | Date: June 2021 | Drawn by: SW | Checked: MM

Dwg. title  
**Layout of sand processing area**

DWG No.  
**DRCL/RCRAWP-13**

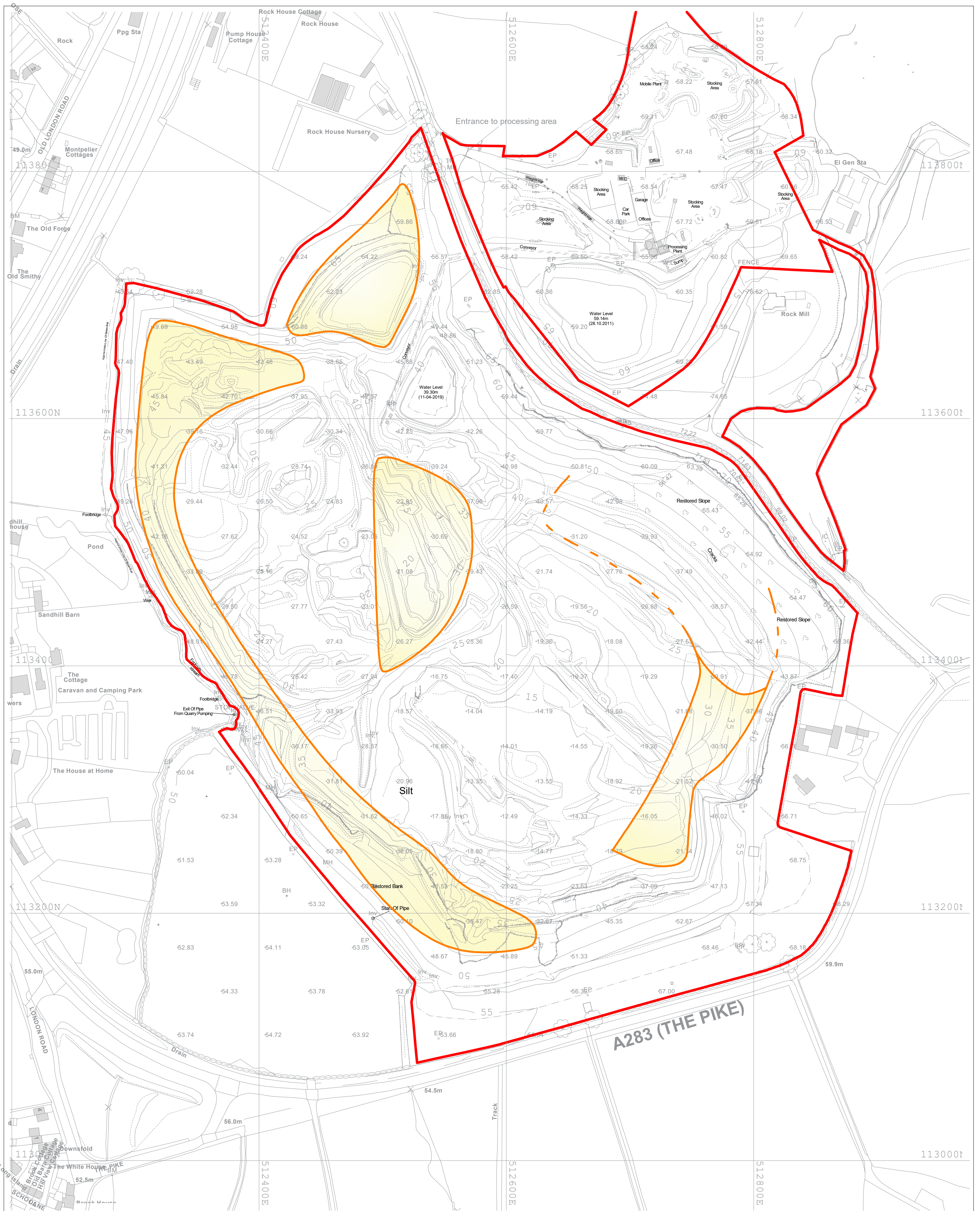
SCALE BAR





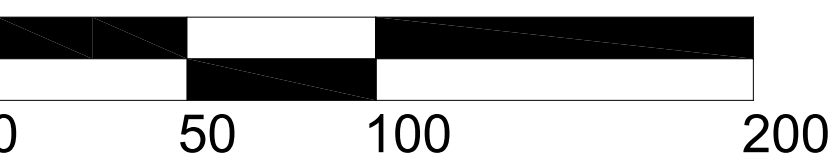






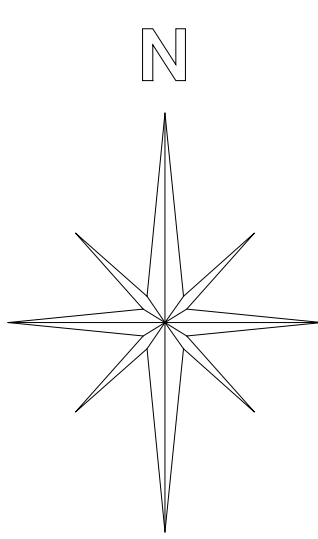
**Legend:**  
 Application Area  
 Areas where sand reserves remain to be extracted (approximate)

**SCALE BAR**



**REVISIONS**

Date	Description	By
11/04/2019	Water Level 39.50m	
28/10/2011	Water Level 59.14m	



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Job Title  
 Rock Common Quarry

Project Title  
 Planning application to vary approved restoration

Scale: 1:2000 Date: June 2021 Drawn by: SW Checked by: MM

Dwg. title  
 Areas of remaining sand reserves

DWG No.  
**DRCL/RCRAWP-14**




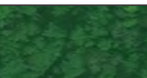







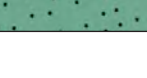
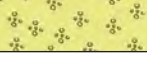

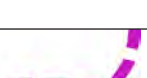




**Landscape Vision:**

To create an integrated ecological and amenity resource at the foot of the South Downs National Park escarpment, which integrates the Site into the surrounding landscape whilst enhancing sense of place.



MAP DATA ©2019 GOOGLE. IMAGE CAPTURE: JUNE 2018, LANDSAT / COPERNICUS.

**LEGEND**

-  Site Boundary
- RESTORATION PROPOSALS**
-  Existing Broadleaved Woodland - To be retained and enhanced.
-  Broadleaved Acid Woodland - To be planted out.
-  Native scrub planting - Self seeded / managed.
-  Lowland Heathland species to be targeted for establishment, further to trials early in phased restoration.
-  Acid grassland establishment targeted with areas of bare ground left for natural succession to take place.
-  Existing Standing water.
-  Proposed Standing water.
-  Marginal planting to areas of standing water.
-  Gravel Islands created above standing water level to provide habitat for ground nesting birds.
-  Sand/Gravel 'Beach' areas to allow interaction with the waterside by visitors.
-  Shallow vertical faces to be created using gabions or similar filled with rock and reclaimed material to provide additional sand Martin habitat.
-  Soft Cliff faces to be retained as habitat to solitary bees. Any enhancement planting within the proximity should avoid these faces as well as sand Martin nesting sites found to the east.
-  Footpaths for informal public access
-  Private use access for maintenance and habitat management
-  Retained hardstanding/site maintenance area
-  Viewpoints from high ground across the Site to surrounding chalk escarpment landform including the wooded Chanctonbury Ring.

**PLANNING**

Rev	Description	Date	Initials
02	Planning Issue	11.12.20	KG
01	Planning Issue	18.11.20	KG
00	Draft Issue	16.10.20	KG

 **LIZARD**  
Landscape Design and Ecology  
The Old Bank, 34 South Street, Tarring, Worthing, West Sussex, BN14 7LH  
T: 01903 216033 E: lizardlandscape@btconnect.com W: lizardlandscapeecology.com

Client  
**Dudman Rock Common Limited**

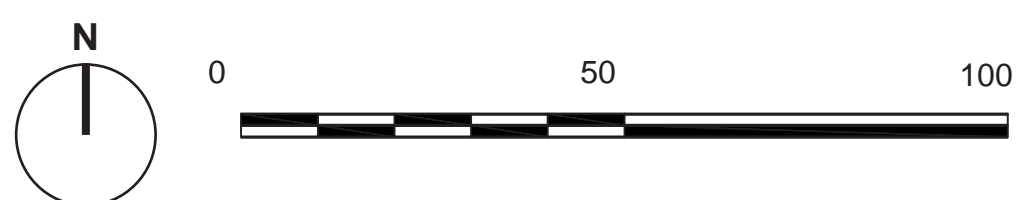
Project Title  
**Rock Common Quarry**  
The Hollow, Washington

Drawing Title  
**Landscape Masterplan Strategy (Illustrative)**

Scale 1:2000@A1 Drawn KG Approved JP Date 11.12.2020

Drawing No. **LLD1955-LAN-DWG-001** Revision 02

**Landscape Masterplan Strategy (Illustrative)**  
**Rock Common Quarry, The Hollow, Washington**





## **APPENDIX 5**

### ***Importation of aggregates and soils/peat for blending***

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## IMPORTATION OF AGGREGATES

---

Planning Permission DC/2151/07 (WS), dated 13 December 2007, granted permission for the "*importation of up to 10,000 tonnes per annum of aggregates to Rock Common Quarry for blending and re-sale*".

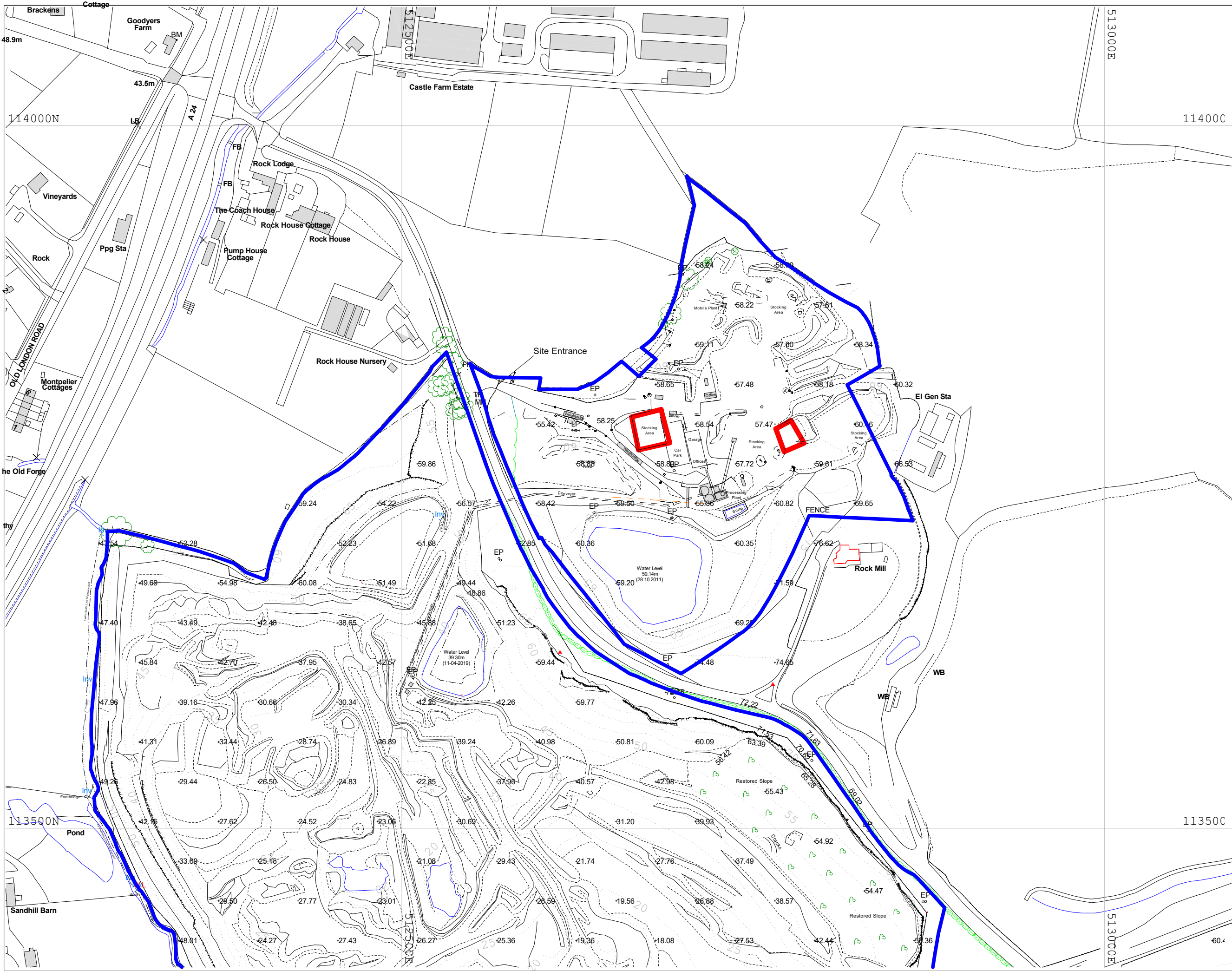
The permission was time-limited, Condition 1 stating that "*the use of the land and plant hereby permitted shall be discontinued permanently on or before the expiration of the period ending 31 December 2020 or upon the permanent cessation of sand working and processing at the Rock Common Sandpit, whichever shall take place first*".

In December 2020 an application under S73 of the Town and Country Planning Act 1990 was submitted to West Sussex County Council (via the Planning Portal) to vary Condition 1 so as to allow the continued importation of aggregates for an additional period of 2 years, that is until 31 December 2022, or until the permanent cessation of sand extraction and processing if sooner.

The application was made because sand reserves remained to be worked at the Quarry and there was a continued need to import material for blending with the sand in order to produce a wider range of products for which there continues to be a demand.

The application was accompanied by Drawings DG/AGGIMPORT/20-01 "Application Plan (Context)" and DG/AGGIMPORT/20-02 "Application Plan". These drawings are included in this Appendix.

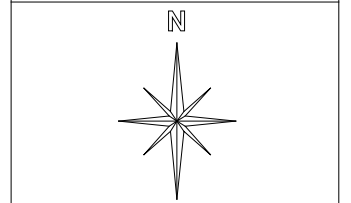
The application, whilst received by West Sussex County Council, was not validated or registered. Further to subsequent discussions with the planning officers at the Council it was agreed that the application to extend the period permitted for the importation of aggregates would be included as part of the application to continue sand extraction and to restore the site using imported material (that is, the application to which this Environmental Statement relates).



REVISIONS		
Date	Description	By
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**Legend:**

- Application Site
- Other land under control of applicant



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 e-mail - mick@terrestria.co.uk

Client  
**DUDMAN GROUP**

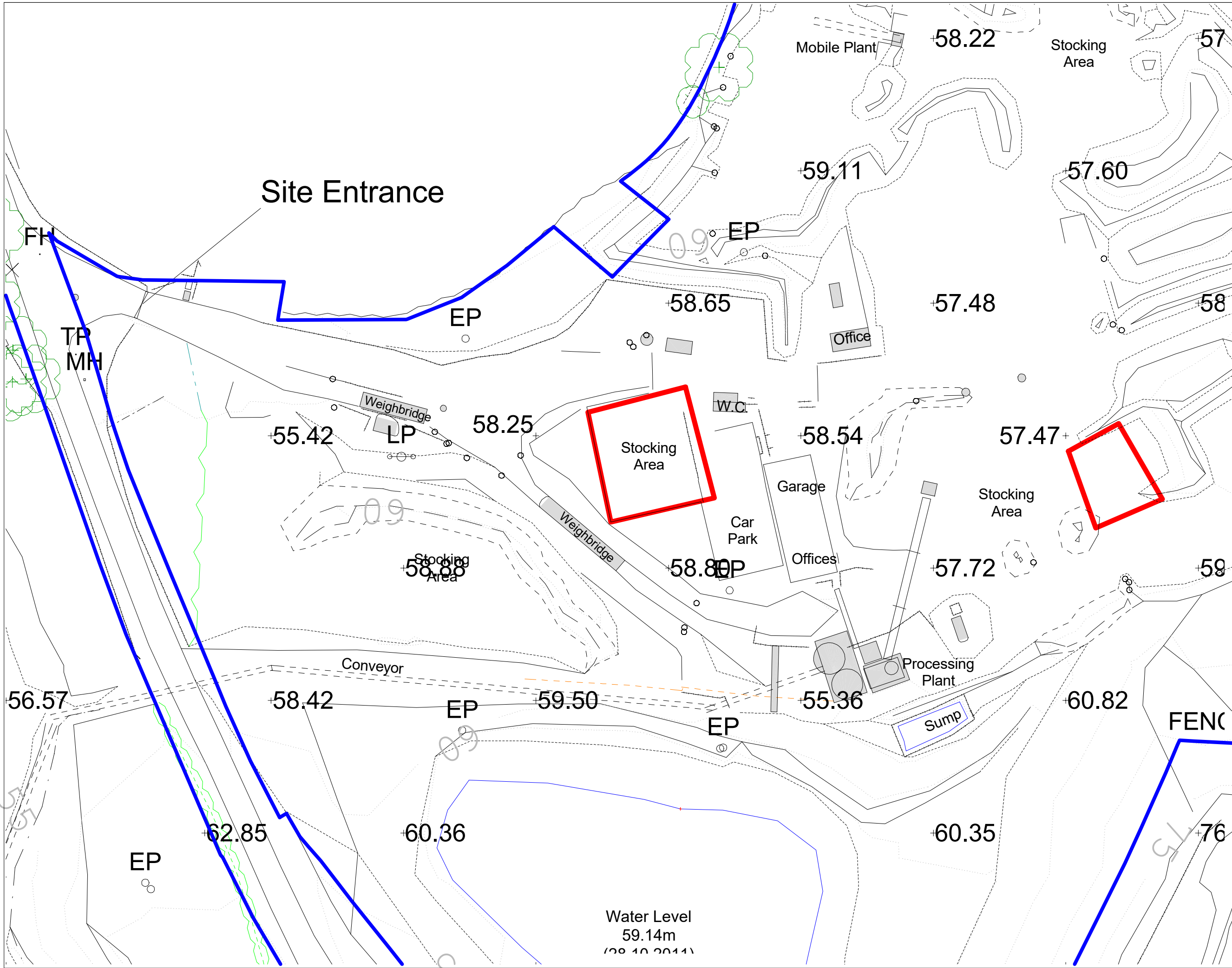
Job Title  
**ROCK COMMON QUARRY**

Project Title  
**Importation of aggregates for blending**

Scale	Date	Drawn by	Checked
1:2500	AUG 2020	SW	MM

Dwg. title  
**APPLICATION PLAN (CONTEXT)**

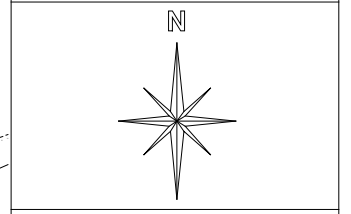
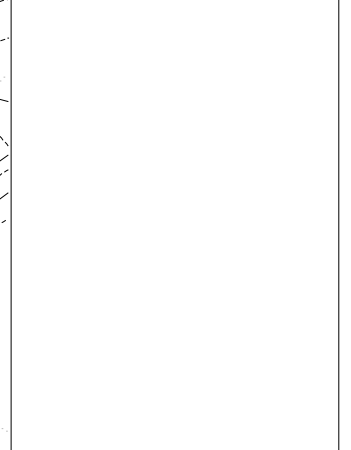
DWG No.  
**DG/AGGIMPORT/20-01**  
PLLOT SIZE: A3. PLOT SCALE: 1:TYPE SCALE HERE



REVISIONS		
Date	Description	By
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**Legend:**

- Application Site
- Other land under control of applicant



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**DUDMAN GROUP**

Job Title  
 ROCK COMMON QUARRY

Project Title  
 Importation of aggregates for blending

Scale	Date	Drawn by	Checked
1:750	AUG 2020	SW	MM

Dwg. title  
**APPLICATION PLAN**

DWG No.  
**DG/AGGIMPORT/20-02**  
PLOT SIZE: A3. PLOT SCALE: 1:TYPE SCALE HERE

Water Level  
 59.14m  
 (28.10.2011)

## IMPORTATION OF SOILS AND PEAT

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Planning Permission DC/554/05 (WS), dated 5 December 2005, granted permission for the "*importation of up to 5,000 tonnes per annum of soils and peat to Rock Common Sandpit for blending with indigenous sands and resale as growing medium*".

The permission was time-limited, Condition 1 stating that "*the use of the land and plant hereby permitted shall be discontinued permanently on or before the expiration of the period ending 31 December 2020 or the permanent cessation of sand processing and storage on the land, whichever shall place (sic) first*".

In December 2020 an application under S73 of the Town and Country Planning Act 1990 was submitted to West Sussex County Council (via the Planning Portal) to vary Condition 1 so as to allow the continued importation of soils and peat for an additional period of 2 years, that is until 31 December 2022, or until the permanent cessation of sand processing and storage on land if sooner.

The application was made because sand reserves remained to be worked at the Quarry and there was a continued need to import soils and peat for blending with the sand in order to produce topdressing and/or growing medium products for which there is a continued demand.

The application was accompanied by Drawings DG/SOILIMPORT/20-01 "Application Plan (Context)" and DG/SOILIMPORT/20-02 "Application Plan". These drawings are included in this Appendix.

The application, whilst received by West Sussex County Council, was not validated or registered. Further to subsequent discussions with the planning officers at the Council it was agreed that the application to extend the period permitted for the importation of soils and peat would be included as part of the application to continue sand extraction and to restore the site using imported material (that is, the application to which this Environmental Statement relates).

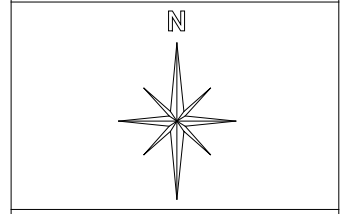




REVISIONS		
Date	Description	By
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**Legend:**

- Application Site
- Other land under control of applicant



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**DUDMAN GROUP**

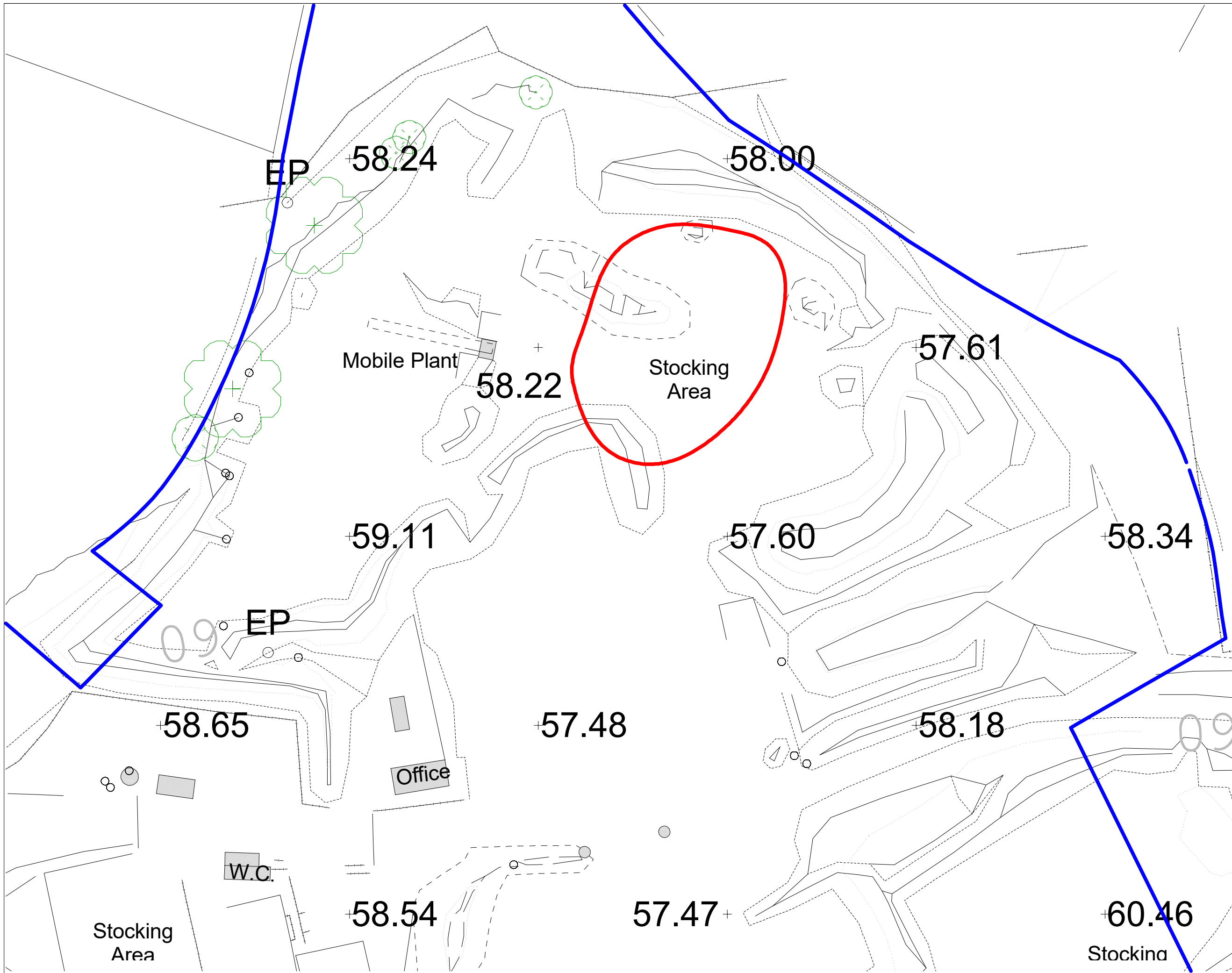
Job Title  
**ROCK COMMON QUARRY**

Project Title  
**Importation of soils for blending**

Scale	Date	Drawn by	Checked
1:2500	AUG 2020	SW	MM

Dwg. title  
**APPLICATION PLAN  
 (CONTEXT)**

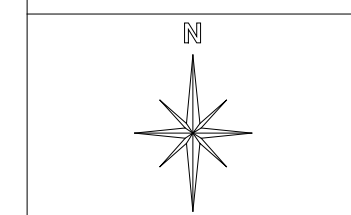
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Date	Description	By
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**Legend:**

- Application Site
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Dwg. title  
**APPLICATION PLAN**

DWG No.  
**DG/SOILIMPORT/20-02**  
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