Objection to application WSCC/028/21 (further information)

As sand extraction continued for approximately 18 months after permissions expired, consequently all useful reserves have now been removed and sand quarrying has now ceased. Has WSCC received assurance or proof of any additional reserves from the applicants? If not, would it not be prudent to remove this part of the application?

Transport

The applicants assume that because the A283 / The Hollow junction was used with similar numbers of HGV traffic when landfill operations took place, it will be safe to do so for their application.

Up to 500 HGV movements around that junction caused chaos during the landfill period. Vehicle accidents on the double bends due to the road conditions (mud and slurry) were commonplace – no amount of wheel washing and road sweeping could control excess mud being trailed out of the site.

2000-2004 vehicle collision data (at the time of the landfill),taken from around the junction shows 36 accidents, including 5 serious and 1 fatal.

No account for the increase in passing traffic has been allowed for despite the obvious growth in 20 years.

A multi-unit business park has been built in The Hollow since 2004 - this also generates a new level of through traffic.

There is no acknowledgement of HGV traffic turning right into The Hollow from the A283 - this is a particularly hazardous manoeuvre for a slow-moving vehicle. Simply trimming roadside vegetation (as stated by the applicant), is a totally inadequate conclusion for the road safety report.

A new traffic traffic-lighted junction at the entrance to The Windmill quarry reception area could produce tailbacks. Its location, less than 125m from the A283, could cause queuing traffic to block the main T-junction, especially at peak times.

Surface Water

Any change of landform in Rock Common will affect the local surface water runoff. To imply it will be contained within the quarry is not very reassuring for local residents.

The historic flooding data is incorrect.

It is a mistake to still portray that the nearest flooding of the Honey Bridge stream occurred 1700m north of the site at A24/ Hole Street(no date given).

In October 2000, January 2008 and June 2012, homes and businesses in The Hollow were inundated with flood water from the Honey Bridge stream, as heavy rainfall during these periods caused a massive increase in surface water runoff.

It is vital that WSCC do not allow these occurrences to be exacerbated by this application, as clearly, they are not a 1 in 100-year event.

Using flow data for the Honey Bridge steam from 1965 is unacceptable! The applicants should carry out their own research.

With weather conditions becoming more unstable, quoting rainfall data for the local area from 1970 is equally unacceptable!

The new reception area is stated by the applicant to have a high risk of flooding. Where would any excess surface water be pumped out to? There is no detail on this important issue, especially if the applicants are allowed to reopen the old interconnecting conveyor tunnel between Windmill and Rock Common quarries.

This currently has a closure notice on it; 'WS/016/15 Condition 8' clearly states "At no time whatsoever shall the backfilled conveyor tunnel be reopened", for the "protection of groundwater quality". It must always be devoid of flood water to prevent contamination from the old landfill site.

Groundwater

It is proposed to use a single extraction well to control the rising groundwater. There is very little detail about this feature contained within the application.

Could a single well placed at the southern end of Rock Common create a safe draw-down of the aquifer beneath the landfill sites, without creating a greater discharge volume and consequently a greater flood risk?

Has any test drilling been carried out? After all, this is a completely different approach to dewatering Rock Common, compared to Dudman's surface water extraction system.

A previous landfill application for Rock Common, made by Veolia, DC/401/07(WS) proposed a 'ring main' of wells around the perimeter of the quarry to control groundwater. It was obviously calculated at the time that one extraction well would not be sufficient.

Would water quality be maintained at all times for the Honey Bridge stream and the local ecology?(especially during construction period)

More research and data should be presented for this very crucial aspect of planning.

Ecology

As the ecology report is now over 2 and a half years old, should it not be reviewed?

My original objection still stands, as little or no mitigation is offered for the many species of fauna and flora already in Rock Common. "Destruction of all existing habitats in the quarry" and "Direct harm to fauna and flora (mortality)", are direct quotes from their report.

- Great Crested Newts

The applicants survey indicates that this rare species is not present in the quarry. I still object to this as their survey failed to include all the ponds in the quarry and in a recommended 500m catchment area. Therefore it should not be looked upon as complete.

Other local lakes and ponds do contain Great Crested Newts as there are still many sightings and recordings of this particular amphibian. One such area noted to have the Great Crested Newt present is Sandhill Farm. There is a photograph on page 69 – these ponds were not surveyed in the original application because of 'Covid restrictions'. This area at least should now be re-examined as it lies immediately adjacent to the quarry.

The following appendices are missing in the Ecology section:

Page 90-91 (Appendix B),

Page 92 (Appendix C),

Page 93 (Appendix D),

Page 94 (Appendix E).

Water Neutrality

As can clearly be seen in Annex A – site layout drawing page 157, the current reception area in Rock Common and the new reception area in Windmill Quarry are two separate sites, remote from each other by some 600m. There is no infrastructure between the two. How do the applicants plan to supply the new reception area with groundwater as the new well feature is situated some 500m away and separated by the proposed infilling quarry?

This proposal appears impractical just to supply 2 cubic meters of ground water per day when up to 6000 cubic metres of ground water per day is pumped to waste.

There is no mention of additional water used for road sweeping and dust suppression.

If the old washroom block is decommissioned at the old reception point as stated, it would leave the whole of Rock Common Quarry area without any toilet facilities for Dudman's employees, contractors or visitors.

Restoration

It is noted that the applicant refers many times to letting groundwater return to its "natural levels (40m AOD)". The repeated use of this statement as some form of veiled threat becomes very tedious.

It's widely known that whatever restoration scheme is preferred, this is not possible due to potential contamination from the adjacent landfill sites. Ground water extraction must continue for many years to come.

"No clay liner" – why is this now the preferred option? Other than it was an 'error' to have previously been included in the design. Surely this or another barrier would be needed to keep any toxins that may have mistakenly been imported separate from the aquifer. No details have been forthcoming.

Volumes and Timescale

Is 8-10 years really enough time to complete the applicants wish to infill Rock Common Quarry? To try to imagine the immense task this will be, a simple site visit to one of the viewpoints into the quarry shows the sheer enormity of the proposal. You can also see in the northeast of the quarry Gault Clay imported from The Rough landfill site construction in 1998-1999. It totals approximately 320,000 cubic metres.

This small area compares to approximately one years' worth of inert landfill (345,000 cubic meters). Multiply this area by 8 or 10, and you can see it has very little impact on the vast expanse of the quarry. I would suggest a 20-30 year, or even longer, timescale is more appropriate.

All volumes and timescales have conveniently been underestimated to make the scheme appear more acceptable.

With the Cemex site at nearby Sullington accepting 1.8 million tonnes of inert waste over the next 10 years, would there really be a sustainable supply of materials locally for another 4 million tonnes needed to 'restore' Rock Common?

Previous restorations of The Rough and Windmill quarries have proved very disappointing, with poor quality soils used in the final restoration and scrubby wasteland left only for sheep grazing. Footpath number 2604 was never re-instated to its original route across The Rough. What guarantees do we have that Rock Common would not be completed to the same inferior standard?

Future

Rock Common quarry must remain essentially as it is now, in a state of rewilding. Limited restoration could be made using materials already contained within the site. Secure safety fences erected and then the quarry could be left to rewild.

As mentioned earlier, pumping would have to continue whatever scheme is decided. This could be powered by 'green' energy – wind, solar or water generated electricity. This would offset the ongoing running costs.

This application is not in the public interest as there would be many decades of HGV disruption and pollution for local residents with no guarantee of a positive outcome.

Fortunately the local area is not devoid of large public open spaces (The South Downs National Park and National Trust land) with many interconnecting public footpaths.

Consequently as the site area has been on private land for many generations, public access would therefore be of little consequence.