



Sandgate Conservation Society

Registered Charity No. 1064010

Planning Services
West Sussex County Council
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Sandgate Conservation Society
C/O Greystones, Melton Avenue
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Pulborough
RH20 4BH

By email

Application Number: WSCC/028/21

Location: Rock Common Quarry, The Hollow, Washington, Pulborough, RH20 3DA

Description:

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

Additional comments in response to further information and other general clarifications submitted to West Sussex County Council.

1. The committee report in regards to planning application WS/15/97, decided in September 2004 and under which the current restoration plan was approved, noted that (at paragraph 5.5) '*In order to accommodate the requirement for ground water levels below the Windmill landfill to be maintained at a reduced level the submitted scheme includes proposals that enable the site to be maintained with either the reduced water level (at a level 32 metres) or at the natural water table level of 42 metres. Pumping operations in Rock Common site would need to be maintained to achieve the reduced level situation but the pumping rate, and hence the discharge to the Honeybridge Stream would also be correspondingly reduced*'. The additional comments provided by the applicant in response to the SDNPA regarding the adoption of one of two suggested alternative approaches to the restoration of the site include that a restoration option that requires the continuation of pumping operations in perpetuity would not be sustainable due to requiring a significant consumption of energy, especially in current circumstances surrounding energy pricing, availability and usage. While a valid point is certainly being made by the applicant here the Society believes that the acceptability of maintaining continuous pumping operations does need to be considered against the potential benefits of doing so in terms of the quality of the restoration and the lower level of disruption to local residents in comparison to the infilling operation. The following points are also worth consideration:-
 - Are the current circumstances regarding energy pricing, availability and usage likely to continue for a significant length of time considering the increasing adoption of cheaper renewable energy;
 - Is there any scope to install a more modern, energy efficient water pump; and

- Is any scope to locally generate renewable energy to run the pump?
2. The Society would have liked to see more in the way of assurances that measures would be taken to help ensure that species that already inhabit the site would be protected from disturbance or even destruction as a result of the infilling and restoration activities. The Response to Principle Planner, WSCC on Landscape and Arboriculture does refer, at paragraph 2.2, to the retention of undisturbed 'refuge' areas throughout the restoration to allow insects to complete their life cycles but makes no mention of other species such as reptiles.
 3. No mitigation is offered for the loss of the peregrine falcon nesting site even though the Planning and Environmental Statement Vol 2 Part 2 that was originally submitted with the application acknowledged that peregrines do nest on artificial structures. An artificial structure to encourage the falcons to continue to nest within the application site need not be particularly obtrusive in the landscape and, if used, would have the benefit of retaining the falcons on the site. If it is not immediately used it could be retained as an additional nest site or, if it proves to be wholly redundant after several consecutive years of non-use, removed at a later date.
 4. The Society's previous comment on this planning application (Joan Grech 20-08-2021) questioned the accuracy of the claim that there are no active inert waste infill sites within the county as there are currently two quarries within three miles of the application site currently accepting inert infill material for restoration purposes. Also raised was the concern that competition for inert infill material may result in restoration activities at all three quarries (Sandgate Park Quarry, Washington Pit and Rock Common Quarry), but in particular the Sandgate Park and Rock Common quarries, being prolonged due to lack of infill material. The applicant has not offered a correction regarding the availability, locally, of alternative infill sites nor offered any comment regarding the availability of sufficient infill material within an acceptable distance of the application site.
 5. Concerns about traffic volumes remain. The applicant's own assessment is that the infilling operation will result in an additional 300 daily two way movements, made up of a combination of 20 tonne tipper trucks and smaller commercial vehicles. This needs to be considered within the context of the other sand winning and quarry restoration activities in the immediate vicinity, as well as significant construction projects already in the pipeline, or anticipated through being identified as potential developments in neighbourhood plans and the district plan, plus the Rampion 2 works which it is anticipated will also have an impact on traffic volumes in the same vicinity.
 6. Some additional information has been provided as requested by West Sussex County Council Highways, and it is stated that HGVs will be fitted with real time GPS tracking to enable management and monitoring of compliance with routing agreements and restrictions. In the Society's previous comment on this application a request was made that should the application be granted, in whole or in part, it should be subject to the same constraints prohibiting HGVs routing through Storrington as are applied in relation to the other sand quarries in the vicinity of the village. It has since become evident that the existing planning condition regarding HGV routing in relation to the other local quarries is badly worded. While the condition requires vehicles to turn right into the quarries from the A283 and left on exit from the quarries onto the A283, i.e. implying that neither routing to nor routing from the quarries is via Storrington village centre, the condition does not explicitly prohibit routing via the Storrington Air Quality Management Area (AQMA) and so technically could be interpreted as allowing turn around at the Washington roundabout, thereby allowing routing through Storrington village centre, and still remain compliant with the condition. Furthermore the experience in regards to HGV routing to and from the Cemex Sandgate Park Quarry revealed a flaw in the arrangements in that third party vehicles used in addition to those Cemex and Inert Recycling could not be tracked as Cemex and Inert Recycling are unable to access third party GPS tracking devices. Lorries to and from the quarry were reported to be routing via the AQMA by local residents. It is important that no lorries should be permitted to route via the Storrington Air Quality Management Area (AQMA) in order not to contribute to air pollution within the centre of Storrington but also for safety reasons, and to that end specific routing instructions for the Rock Common Quarry HGVs should be drafted and agreed with interested parties before they are approved in order to help ensure that no similar potential 'loophole' arises in those routing instructions. I understand that this is a concern also held by Storrington & Sullington Parish Council.

7. In regards to the HGV traffic, in the interests of general air quality we suggest the inclusion of a condition that all HGVs associated with the exportation of sand and importation of inert material are Euro 6 compliant.
8. Also raised in the Society's previous comment was the concern that the habitats created on the site via the restoration scheme were likely to suffer degradation due to public access. While the plan shows a footpath intended to be used by the public it should not be assumed that the public will stick to the designated path. A significant issue at Sullington Warren SSSI is the creation of 'desire lines' which cause degradation and loss of habitat. Given that a major benefit of the restoration of the site would be the creation of habitats and biodiversity gain measures should be taken to help ensure that this benefit is realised. It may require that some parts of the site are physically inaccessible to people and their dogs.

Yours faithfully

Joan Grech (Secretary)
On behalf of the Sandgate Conservation Society Committee