

CHRIS BARTLETT  
WEST SUSSEX COUNTY COUNCIL

OUR REF:  
Contact Officer:  
TEL. No.:

SDNP/21/03824/ADJAUT  
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6th September 2021

Dear Mr Bartlett,

**NEIGHBOURING AUTHORITY CONSULTATION**

**Applicant Name: Dudman (Rock Common) Limited and The Wiston Estate**

**Proposal: ADJOINING AUTHORITY CONSULTATION - WSCC/028/21 - 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.**

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

Thank you for your correspondence received 14 July 2021, consulting us as a neighbouring authority on the above noted development proposals.

ALTHOUGH THE APPLICATION SITE IS LOCATED OUTSIDE OF THE NATIONAL PARK, THE COUNCIL HAS A STATUTORY DUTY TO CONSIDER THE PURPOSES OF THE NATIONAL PARK WHEN MAKING ITS DETERMINATION. THE STATUTORY PURPOSES AND DUTY OF THE NATIONAL PARK ARE:

- **Purpose 1:** TO CONSERVE AND ENHANCE THE NATURAL BEAUTY, WILDLIFE AND CULTURAL HERITAGE OF THE AREA.
- **PURPOSE 2:** To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.
- **Duty:** TO SEEK TO FOSTER THE SOCIAL AND ECONOMIC WELLBEING OF THE LOCAL COMMUNITIES WITHIN THE NATIONAL PARK IN PURSUIT OF OUR PURPOSES.

THE NATIONAL PARK'S COMMENTS ON THE DEVELOPMENT ARE AS FOLLOWS:

The application requests the continued working, importation of material (including peat), cement processing and restoration of the site using imported waste.

The site at Rock Common Quarry is considered to contribute to both the landscape and visual setting of the National Park. The current contribution is not as positive as it could be, both in landscape terms and

in visual terms. So opportunities exist through this planning application to secure the positive contribution this site can make to the National Park's setting and wider aspirations in relation to Nature Recovery.

The site does not require inert fill to deliver the above ambitions. Whilst inert fill is one of the mechanisms to restore the site, it is not the only approach to take, and it appears to come with risks to water quality in particular.

3 relevant published Landscape Character Areas cover this site:

- Partly within Storrington Woods and Heaths – West Sussex LCA
- Partly within the Central Scarp Footslopes – West Sussex LCA
- The above LCA directly abuts the South Downs ILCA Arun to Adur scarp footslopes. As a result we expect the two to share characteristics.

The site is also within the 'Lower Adur Arun Watershed BOA'. Any landscape design should respond to BOA targets to help deliver broad landscape-scale biodiversity ambitions.

The application is lacking on a few key points of information:

- Restoration scheme has no legend
- What was the pre-worked landform
- Whether a clay liner is needed or not is fundamental to help us understand the potential negative effects and therefore acceptability of the scheme. i.e. potential for leachate to pollute as a result of the use of inert material.
- There are no context plans – so we have no concept of how the restored levels knit into context, thus delivering an integrating approach to restoring landform character.

#### *The Proposed Restoration Scheme*

The current proposal, whilst an improvement on the historic permitted scheme, is yet to adequately respond to landscape character or acknowledge the current site's sensitivities. In particular, there is no exploration of the site's role in providing the setting to the National Park. The working of this site has led to numerous impacts, including the loss of characteristic patterns of hydrology, and fieldscape. Whilst the current scheme proposes to create new habitats, these habitats bear little relationship to landscape character. The point of which ensures the restored scheme integrates within the *existing* landscape whilst delivering characteristic nature recovery. For example, standing water is proposed instead of restoring the functioning stream system, grassland is proposed, but no restoration of the historic field pattern and hedgerow network. Whilst standing water is typical of worked sites, it is not a strong characteristic of this sandy landscape and certainly not at the scale and cluster of water bodies found in worked sites, including this one.

#### *A restoration acceptable to the National Park*

Given the above short-comings, it seems there are two approaches to take at this site, which would be acceptable from a National Park setting point of view.

- Either:
  - Provide a faithful landscape restoration. Informed by evidence, using inert fill to restore the site's landform and maximise the benefits we can accrue from naturally functioning landscapes. This approach requires assurances that leachate from the fill itself, or from the neighbouring landfill can be successfully prevented from polluting the site long-term.
  - Landform would be restored to its characteristic pre-worked levels and knitted into the site's perimeter.
  - Streams and hydrological patterns would be restored.
  - Field patterns, using characteristic hedgerow species, and species-rich acid grassland would be restored.
  - Rock Common would be identified as having a distinctive and different character from the site to the south of the Hollow which is far more agricultural.

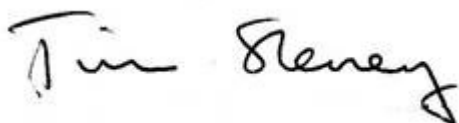
- Provide open access to the area north of The Hollow in-keeping with the characteristic commons found along the greensand.
- Create small-scale and varied selection of characteristic habitats comprising; small woodland copses, wet and dry heath and acid grassland.
- Or:
  - Provide a nature-led restoration. Allow the site to recover/restore 'naturally' with limited (but still some) design/management input. This 'rewilding' approach would ensure the site's current benefits are retained and enhanced and significantly reduces the risks posed from imported waste.
  - Quarries which have been abandoned, are often some of the very best site's for biodiversity. As landscapes become ever more managed, opportunities for pioneer communities, and nature-led habitat creation are severely lacking habitats in both the National Park and SE.
  - Natural regeneration delivers much needed amelioration of degraded sites, through for example, creating and protecting soils all without the need for importing waste or further manipulating the landscape.

The current restoration scheme really falls between two stalls, and doesn't yet achieve a distinctive and characteristic response to the landscape. From a setting of the National Park point of view and the ability to achieve positive nature recovery, the preference is for the latter option. Whilst it fails to restore the landform, the other benefits which could be accrued through this approach would far outweigh this, and would accept the quarry as yet another layer in the landscape's time-depth.

#### *Conclusions*

Whilst the proposal in visual terms represents an improvement upon the previous outdated scheme, it is not a scheme characteristic of the landscape, it appears to have been designed with 'fill' as a pre-requisite as opposed to what scheme might deliver the best *overall* outcome for the landscape. A low level of intervention is recommended for the restoration of this site, to help this site contribute positively to the National Park's setting, Purposes and wider partnership ambitions around Nature Recovery, Green Infrastructure (People and Nature Network), landscape enhancement and improved access.

Yours sincerely



**TIM SLANEY**

Director of Planning  
South Downs National Park Authority

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