Dear Mr Bartlett

Re: WSCC/028/21 – Rock Common Quarry

We are writing to you in our capacity as councillors representing the Storrington & Washington ward in. Horsham District Council. This letter from myself, Cllr Joan Grech, and my fellow councillors Cllr Claudia Fisher and Cllr Emma Beard. We have raised this matter with the local county councillor, Paul Marshall, and he advised us to refer this matter directly with WSCC Planning.

There is a significant amount of concern about this planning application within the ward, in particular amongst the residents of Washington but also residents across the ward. These concerns are shared by the two parish councils within the ward, Washington PC and Storrington & Sullington PC, as can be seen by the comments objecting to this application submitted by those parish councils. The level of local concern about this planning application can be seen by the sheer number of objections received against this application from the public, and even from two neighbouring parish councils. The local opposition to this application is such that a group of residents have organised themselves into an action group (The Chanctonbury Landfill Action Group – CLAG3) and have submitted detailed objections to the proposal. The group is currently seeking a meeting with the local MP.

On Monday 14th August we met with representatives of CLAG3 who raised some very valid concerns about this planning application. We share many of these concerns.

This application requests:
● The extension of sand extraction for a further 2 to 3 years to enable the extraction of remaining sand reserves.
● The continuation of the import and blending of soil and peat and concrete batching operations.
● A new restoration plan. The current approved restoration plan is to allow the quarry void to fill with water when sand extraction has finished and the pumping of water out of the quarry has stopped, resulting in a deep lake of up to 30 metres. The new restoration plan would see the quarry void largely filled in, leaving a number of areas of shallow water / shallow lakes with islands.
● To facilitate the new restoration plan the importation of inert engineering and restoration material; the stockpiling and treatment of the material; the placement of the inert material into the quarry void; and the restoration and landscaping of the quarry (estimated to take 8 years).

The reasons given to support the variation in the restoration plan are:

● *Deep bodies of water pose a danger to the public and creating large bodies of water with steep underwater slopes is no longer considered best practice.*
We accept that this is true, there are a number of fatalities during hot weather due to people swimming in quarries etc., but any water poses a risk. Arguably, shallower, warmer water may encourage unauthorised swimming, plus warmer water encourages blue green algae which is toxic. So regardless of the restoration plan it

seems that measures to dissuade people from entering the water would still be needed.
● *Deep water does not produce conditions for the creation of a wide and varied range of ecological interest.* We also accept that this is true, but the current quarry supports a surprising variety of wildlife, including rare species, and we are concerned that such extensive restoration work will result in significant disturbance to that wildlife, as well as loss of existing habitats such as sand cliffs – a nesting site for Sand Martins and Peregrine Falcons . The potential impact of the restoration work on the wildlife is recognised in the application and mitigating measures are proposed but assuming those measures are sufficient – and we don't have the expertise to know – we are concerned that operational and/or cost priorities may override those measures - how will WSCC ensure that required measures are taken?
● *Under the current restoration plan there is a potential of leaching from the nearby household waste landfill sites.* While we do not have the technical knowledge to comment fully, when approval of the current restoration scheme was given in 2004 it is evident from the available documents on the planning portal that the possibility for pollution from the landfill under certain conditions was recognised. So the question is by whom and why it has now been assessed that conditions are such that the potential for pollution from the household waste sites now necessitates a change to the restoration plan?

The quarry site is leased to Dudmans by the Wiston Estate. The Wiston Estate has a Whole Estate Plan. Whole Estate Plans (WEPs) were introduced by the South Downs National Park Authority (SDNPA) to encourage dialogue and cooperation between individual estates with land-holdings within the National Park, and with the SDNPA, with the objective that land management decisions should contribute to the Purposes and Duty of the National Park. The Wiston Estate WEP 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*". Even though the Wiston Estate WEP is endorsed by the SDNPA, the SDNPA comment on this application shows that it is not keen on the proposed restoration approach.

The SDNPA advocates either:

1. a restoration that restores the landform to how it would have looked before quarrying, as the proposed restoration (and in fact the previous restoration plan) would not integrate with the existing landscape, in particular the SDNP to which it abuts; or

2. to let it naturally regenerate. This latter approach is one that we would also endorse.

The SDNPA comments conclude with:-
"*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 prerequisite 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."

We wholeheartedly agree with this view.

It is also important to note that the SDNPA questioned the lack of information regarding the need for a clay liner and whether a clay liner was needed to prevent pollution from leaching.

<u>Is there a sufficient degree of confidence that the revised landscape restoration plan will prevent leaching from the household waste site and pollution of the constructed lakes and adjacent water course, the Honeybridge stream?</u>
The Honeybridge stream, which flows near to the quarry and currently receives some of the water pumped out of the sand workings, is an important tributary of the River Adur. Its water is mainly derived from the chalk aquifer and therefore clean and clear. It was assessed by the Wild Trout Trust in 2008 as "*.....a superb little spawning and nursery stream for both small brown and migratory sea trout.*" It also noted that "*Entering the Adur right at the top of the tidal reach probably makes this stream even more valuable as a sea trout habitat.*" The Adur estuary is a SSSI at Shoreham and an RSPB reserve. Any pollution of the Honeybridge Stream and, additionally, any consequential pollution of the Adur could therefore have significant ecological consequences which does raise concerns given the seeming lack of certainty that the proposed restoration plan will avoid leaching from the household waste site into the constructed water bodies and the Honeybridge Stream. What measures will WSCC require the applicant to employ to ensure that there will be no pollution of the Honeybridge Stream, and how will these be monitored?

In the planning application it is claimed that the WSCC Monitoring Report (2019 - 2020) states that there are no active inert waste landfill sites within the county. This is incorrect. There are two sites less than 2.5 miles away - the Sandgate Park Quarry (CEMEX) and the Washington Pit (Britaniacrest). Far from there being a lack of inert landfill sites the problem in the past has been a lack of inert material for existing sites e.g. Britaniacrest requested an extension to the period it had been allowed for the import of inert material for the restoration of the Washington Pit due to a shortage of inert material (pre COVID).

CEMEX is currently in the process of importing 1.8m tonnes of inert material over 11 years (to about 2032) for the restoration of the Sandgate Park Quarry. This, according to CEMEX, equates to around 250,000 to 350,00 tonnes per year. In comparison, this application states that the total amount of material required for the Rock Common Quarry site is 2700,000 cubic metres in total - approximately 345,00 cubic metres per year. Using the figure provided in the application for the conversion of cubic metres to tonnes, based on an average weight for this type of material (2.05 tonnes per cubic metre), this would equate to over 5.5m tonnes in total at a rate of 700,000 tonnes per year - a significantly bigger operation than that currently taking

place at the Sandgate Park Quarry. Unless there are some significantly large construction projects there may well be a risk of shortage of inert material thereby prolonging the restorations of all of the quarries and/or inert material will need to be brought in from longer distances, even perhaps from other counties. We do know that large construction projects in the county are possible e.g. the A27 Arundel bypass and the development of strategic sites once the HDC Local Plan is approved, but we don't know when they will happen and when inert waste material removed from those construction sites will be available.

Many of those construction sites will be some distance away from the Storrington/Washington quarry sites (works at the proposed Arundel bypass would be around 12 miles away). Other inert waste disposal sites may exist closer to the construction sites, and even if they don't currently exist, should additional landfill capacity for inert waste be required the WSCC Monitoring Report (2019-2020) recognises that new proposals for inert material recovery tend to come forward to meet demand the 'capacity need'. It is therefore probable that alternative sites will become available which are better spread across the county and closer to the source of the waste material.

So we ask, where will the vast amount of inert waste material come from and what distances will be involved to bring it to the Rock Common Quarry site?

The applicant's argument that the importation of inert landfill material into the Rock Common Quarry meets a county need does not seem to be compelling.

<u>Our specific objections against this application are:</u>

1. Continued working at the quarry (not just the few extra years to extract all of the winnable sand but to also complete the restoration work).
The applicant states that the importation of inert material will take 8 years but given that the Rock Common Quarry will be competing with the CEMEX Sandgate Park Quarry for inert material the restoration of both quarries may be delayed (It looks from a distance that the restoration of the Britaniacrest Washington Pit is well advanced so there may not be a future requirement for much more restoration material at that site). This will just prolong the disruption caused to local residents and businesses by works at Rock Common Quarry, who had the expectation that activity at Rock Common Quarry would have ended by 31st December 2020, and potentially prolong the disruption caused by continuing work at the Sandgate Park (and possibly the Washington Pit), if a shortage of inert waste material delays restoration works at these sites.

2. Additional, amounting to unacceptable, levels of HGV traffic resulting from the delivery of restoration material to the Rock Common Quarry.
This needs to be considered in the context of other ongoing and potential developments in the area such as:

a) On-going workings at the Sandgate Park Quarry and Washington Pit involving the export of sand and import of inert material for restoration of the quarries;

b) Large developments in the local area for which permission has been granted:-

● The demolition of existing buildings and erection of 90 dwellings, and creation of access onto Rock Road at the Thakeham Tiles site;

● The erection of up to 62 residential units and creation of new vehicular access at the field north of Downsview Avenue;

● Demolition of existing buildings and erection of 60 bed care home and 8 bungalows plus associated access and landscaping works at Old Clayton Kennels site on A283 Storrington Road;

● The conversion and redevelopment of existing buildings to create a 42-bedroom care home, 14 assisted care units, 23 close care apartments, ancillary accommodation with associated external works and landscape including new car parking at Sussexdown on A283 Washington Road; and

● On-going phased working at the Tesla site on Water Lane for additional buildings, storage, and associated car parking and landscaping.

c) The identification in the WSCC Joint Minerals Plan of the Chantry Pit extension (off the A283 between Sullington Lane and Chantry Lane) as a site suitable for future sand winning (subject to a planning application being made and permission being granted);

d) Potential housing development at Ravenscroft Allotments (site identified for potential development in the Storrington & Sullington and Washington Neighbourhood Plan (SSWNP));

e) Other potential developments at sites identified in the SSWNP and Ashington Neighbourhood Plan;

f) Potential housing developments at strategic (800+ homes) and non strategic local sites (more than 5 but fewer than 800 homes) identified in the Horsham District Local Plan required to meet district targets for the delivery of housing;

g) Potential applications to extend infilling timescales at existing local quarry sites; and

h) Rampion 2 - creation of cable route in the area including in the immediate vicinity of the Rock Common Quarry with the current plan that a construction compound will be sited adjacent to the quarry site.

The increased HGV traffic, specifically arising from this application but also in combination with increased HGV traffic arising from the ongoing and potential developments listed above, has the potential to cause:

● Road safety issues:- The proposal is that HGVs delivering inert material would enter the site via the A283 junction with The Hollow. The HGVs entering and leaving the quarry site in order to collect and deliver sand have a ‘left in / left out’ rule. This means that when turning in and out they do not cross the carriageway so do not cause a hazard to vehicles approaching from the opposite direction. No such rule is proposed for HGVs delivering inert material as it would not be feasible. Instead, drivers will be encouraged to approach from the west so that they turn left from the A283 into The Hollow when arriving at the site. This would still mean that when

exiting towards the west i.e. heading towards the A24 north or south, or the A283 westbound (though this would take them through Storrington which we don't want as this would take the HGVs through the AQMA and add to the traffic congestion in the village unless they turned into Water Lane to head towards Thakeham or West Chiltington Common) they would still turn right out of The Hollow onto the A283 and thereby cross the eastbound (towards Steyning) carriageway of the A283. Depending on time of day and traffic congestion it is also probable that some drivers approaching from the east would decide to turn right into The Hollow from the A283 rather than face the delay involved with turning at the busy Washington roundabout to approach The Hollow from the west. It is understood that an upgrade of the Washington roundabout to reduce congestion at the roundabout is planned but we don't know when it is planned for and whether it takes into account the anticipated increase in traffic. So, a significant number of the estimated 300 - 500 HGV movements per day will likely involve a turning into or out of The Hollow across the A283. A review of road traffic incidents on the website crash.co.uk, which uses government supplied data, shows a cluster of incidents at or near the junction. In the last five years these incidents have been minor (though arguably the number of vehicles turning across the A283 into and out of The Hollow has been low due to the 'left in/left out' rule followed by drivers of the sand HGVs) but over the past 21 years have included three serious incidents. It is also possible that drivers may seek to avoid the Washington roundabout by turning left off the A283 onto The Pike into Washington village, then right onto the London Road and then right again to exit the village onto the eastbound carriageway of the A283. This would also potentially increase the risk to other road users on the A283 and the presence of heavy vehicles within the village would increase the risk to other road users, including pedestrians, in the affected part of the village, as well as disturbance and inconvenience to Washington residents.

● Traffic congestion: The turning of HGVs across the A283 is likely to cause some delay to traffic even if it is relatively minor. Any additional HGVs using the Washington roundabout will increase congestion at the roundabout with knock-on effects on the A283 in both directions and the A24 in both directions (though potentially alleviated to some extent by proposed improvements to the roundabout). It is also probable that many HGVs will be approaching / leaving via the A24 south of the Washington roundabout so there is the potential of additional congestion at the Findon, as well with further knock-on effects along that stretch of the A24 as well. We understand that an upgrade is also planned for the Findon roundabout but again we do not know when that is planned for and whether it will take into account the anticipated increase in traffic.

● Increased air pollution: Regardless of the fact that modern diesel HGV engines are lower polluting than older HGVs (though the amount of air pollution generated by all engines depends to some extent on load weight and whether they are being driven at a consistent 'motorway' speed or not) stop/start driving due to congestion results in more tyre and brake pad wear and, therefore, the release of larger quantities of particulate matter - PM2.5 & PM10 - which is harmful to human health and to the environment.

● Increased greenhouse gas emissions*****: Assuming a relative conservative estimate of 10 miles (or 16km) distance from the source of the inert material to the quarry; 400 vehicle movements per day on average (application states 300-500); 5.5 day working week (half day on Saturday), 50 working weeks per year and 10 years of infilling***** this would equate to:-

10 x 400 x 5.5 x 50 x 10 = 11,000,000 additional HGV miles (17,600,000 km) over the 10 year period,
or
10 x 400 x 5.5 x 50 x 1 = 1,100,000 additional HGV miles (1,760,000 km) per year in addition to the existing HGV traffic associated with sand winning, soil and peat blending, and cement batching.

Even the most modern fossil fuel powered HGV (conforming to Euro VI standard) emits some greenhouse gases and older HGVs conforming to earlier emission standards (pre 2012) have higher emissions in slower and stop/start driving conditions typical of much non-motorway driving. The application states that 20 tonne tipper trucks, plus a variety of smaller vehicles will be used to import the inert material. It can be assumed that the majority of the vehicles will be large tipper trucks transporting material from large construction sites. For the purpose of this document, it is assumed that these trucks will be modern vehicles meeting the latest emission standard - Euro VI (though the possibility that trucks that comply with earlier, less stringent standards will be used cannot be excluded). Government figures indicate that these trucks emit 540g of CO2 per kilometre when driven at 40mph and 560g of CO2 per kilometre when driven at 50mph.
Using these figures, it can be approximated that additional CO_2 emissions will be an additional 960 tonnes of CO_2 per year which equates to 9600 tonnes over the 10-year period. As a comparison it can be noted that Horsham District Council has calculated that its own direct annual carbon emissions in 2021/22 (heating and lighting its own buildings and fuelling its vehicles) amounted to 1003tCO2e, and in accordance with its own carbon emissions reduction plan that is set to fall to net zero by 2030. Also, although not all of the estimated emissions arising from the proposed quarry infilling may occur within Horsham District, any increase of CO_2 emissions within Horsham District will be contrary to the aim of the Council that CO_2 emissions should decrease within the district to net zero by 2050. It is also contrary to the WSCC Climate Change Strategy 2020 to 2030**.

3. Disruption, noise and pollution arising directly from the infilling operation. In addition to the prolonged disruption, noise and pollution to local residents caused by vehicle movements associated with the quarry infilling operation there will also be additional disruption, noise and pollution caused by the infilling works themselves, including from the processing of the imported infill material - we assume this includes noisy and dusty concrete crushing - and the movement of the material within the site and its deposit into the quarry void.

4. The loss and degradation of existing wildlife habitats e.g., sand cliff - currently a Peregrine nesting site, and disturbance caused by extensive restoration works to species currently found on the site including several bat species, including some rare ones, Dormice, reptiles and birds, including the breeding Peregrine Falcons, Sand Martins and Linnets. Local residents also report that Great Crested Newts are seen in the area, but the application's Ecological Impact Assessment fails to make mention of them, indicating, possibly, that the locations within the quarry area selected for the ecological survey were too limited to give a comprehensive view of the true range of wildlife on the site. Given that the site is surrounded on three sides by major roads and on the fourth side by farmland, with a few connecting hedgerows, it is doubtful that some, less mobile, species would be able to easily

naturally recolonise the restored site from the surrounding landscape. Soil compaction is caused when soils are traversed by heavy machinery and also in the handling (stripping, stockpiling and transporting) of soils. While this may be beneficial where the intention is to produce a wetland habitat the quarry currently supports species that thrive in dry sandy soils, such as reptiles and burrowing insects. The proposed restoration plan will require the movement of heavy machinery across the site in contrast to the current 'light touch' restoration scheme.

5. Failure to make use of a valuable resource by recycling and reusing it. We question whether the disposal of so much inert material into a large hole is the correct thing to do. As much construction, demolition and excavation waste as possible should be recycled as a new product, such as secondary aggregates to reduce the CO_2 emissions of the construction industry and into recycled soils to preserve a valuable resource.

Other concerns we have been made aware of by local residents, which we share, include:

● The impact of the additional HGV traffic on The Hollow that may threaten the stability of the road. Should damage occur to The Hollow due to the additional heavy vehicle traffic this would significantly impact on the infilling operation and may require all quarry vehicles to enter and exit solely by a single route with the road safety and congestion issues that is likely to cause.

● The risk that the reopening of the conveyor tunnel between the Windmill and Rock Common quarries, which 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". The reason being that the tunnel must always be devoid of flood water to prevent contamination from the old landfill site. It should be noted that the applicant acknowledges that the reception area has a high risk of flooding. The application seems not to have detail on how this risk will be managed should the tunnel be reopened.

● We understand that in order to enable two HGVs to pass each other on the site there is a proposal to excavate into a previous landfill site.

● Residents contest the statement that the area is not prone to flooding and have provided evidence of the same (e.g. See Tina Fowler Objection dated 22/08/2021). In fact, as noted above, the applicant acknowledges that the quarry reception area has a high risk of flooding. It is understood that during extreme rainfall episodes rainwater will flood out of the site and under the A24. The Environment Agency 'Flood Map for Planning' website shows parts of the site to be within Flood Risk Area 3.

Furthermore:-

● The Water Neutrality Statement (WNS) review commissioned by WSCC concludes that the applicant's WNS is currently insufficient, and it includes a list of specific recommended actions required to update the WNS to bring it up to the required standard.

● With respect to the part of the application relating to continued peat and soil blending, given the impact on climate change and the environment of peat extraction we would like to see activities associated with peat extraction and its use for horticultural purposes discouraged. We note that the UK Government has announced its intention to ban the sale of bagged peat compost to amateur gardeners by 2024 and this is expected to apply to around two-thirds of peat currently sold in England. Environmental NGOs are campaigning to halt all peat excavations and sale.

We strongly object to this application for all the reasons stated above.

Your sincerely

Cllrs Joan Grech, Claudia Fisher & Emma Beard

*Contradictions to the HDC and WSCC climate policies
https://www.westsussex.gov.uk/media/14787/climate_change_strategy_2020-2030.pdf :
According to the West Sussex County Council Climate Change Strategy 2020 to 2030, which was published in July 2020, WSCC's vision is as follows:

"*In 2030, West Sussex County Council is carbon neutral and climate resilient, using our limited resources wisely. West Sussex County Council has enabled positive actions and behaviours across our county to mitigate and adapt to climate change*".

The document continues:
Long term sustainable thinking
Integral to achieving this is the need to think sustainably. We need to consider the actions we take now and how they will affect generations in the future.

And,

This strategy is: For all our officers and elected Members, to guide them to make the right decisions and choices at the right time.

The policy identifies the following benefits:

Improved air quality - reducing carbon emissions from transport will require us to think differently about how we interact and travel. Reducing transport by petrol and diesel vehicles will not only contribute to carbon reductions but will also reduce the amount of harmful nitrogen oxide emissions, the main source of which is vehicle emissions.

And states the County Council's Commitments:

We will reduce the carbon associated with road-based transport

1. We will use technological solutions to avoid the need for travel
2. We will prioritise sustainable transport options
3. We will reduce the impact of any remaining road travel.

Yet permitting this infilling could result in an additional 11m HGV miles (17.6m HGV km) over 10 years (based on the assumptions and calculations provided above) and, roughly, 1 lorry associated with the infilling operation arriving or leaving the quarry site every minute during operational hours (assuming a 7 hour day and 400 vehicle movements in and out of the quarry site per working day). The calculations are based on what is assumed to be a conservative estimate that the sources of the inert infilling material will be, on average, 10 miles (16km) distance from the quarry. This is roughly as far north as the south of Horsham, south to the coast, as far east as Hurstpierpoint and west to Petworth. Given the availability of suitable inert material deposit sites within the county and the location of anticipated developments that will generate inert material does this seem to be a reasonable assumption or is it the case that journey distances may be longer?

Given that the infilling operation at the quarry could potentially result in an additional 960tCO2e per year for the next 8, or quite possibly more, years - beyond 2030 - how does that align with the County Council's commitment to reduce road transport by petrol and diesel powered vehicles, and their associated harmful emissions, given the, as yet, slow uptake of electric powered heavy trucks?

The additional number of heavy vehicles will also inevitably increase the rate of wear and damage to the roads, especially given that the incidence of extreme weather events that can weaken road surfaces, such as heat waves and extremely heavy rain, are becoming more frequent due to climate change. In addition to the risks to road users caused by damaged roads, such as risk of accidents and of damage to vehicles due to potholes, road users will also suffer inconvenience caused by the need to close roads for repairs. Also, the repair of roads would be an additional source of greenhouse gas emissions.

**Although the application estimates that infilling will take 8 years, the number of daily vehicle movements is given as a broad estimate of 300-500 and a mid figure of 400 is used in the calculation. A 'worst case' would therefore be that the 400 vehicle movements per day is an underestimate. Also, you will note below that an assumption has been made that the 20 tonne tipper trucks that will be used will conform to the Euro VI - i.e. will date from 2012. It seems probable that at least some of the tipper trucks used will predate 2012 and so will conform to lower emission standards. Finally, the 8 year duration given in the application is an estimate - the actual words used are 'around 8 years' and it is quite possible that infilling will take longer than 8 years.