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Mr John Palmer
SLR Consulting Limited,
Langford Lodge
109 Pembroke Road
Clifton
Bristol, BS8 3EU

17th April 2014

BY EMAIL ONLY

Dear Mr Palmer,

Application Number: WSCC/104/13/SR
Address: Washington Sand Pit, Hampers Lane, Sullington, West Sussex, RH20 4AF
Proposal: The continuation of mineral extraction for a two year period and the importation of inert material over a five year period only, to enable the restoration of mineral working at Washington Sandpit for the long term benefit of the Sandgate Country Park

With regard to the above application, West Sussex County Council formally requests further information before the application can be determined.

Further information required under Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011

The submission of the following information is seen to be essential further information in respect of the application to verify the particulars of the submitted development proposals, and/or to enable proper consideration of the likely environmental effects. Although you have already responded to the initial consultation response of Horsham District Council's Environmental Health Department, their initial request and recent response is factored in below. Notwithstanding any further information that may later be deemed necessary, the following information will be required to enable West Sussex County Council to determine the application. If the requested information is not supplied, then the likely conclusion would be a refusal of the application on grounds of lack of information.

Restoration

- The proposed gravel beach with broken islands boundary with the adjoining CEMEX (Sandgate Park) site as depicted on Drawing No. WP L/15 (DRAFT) lies outside of the red line boundary and is not believed to be under the control of the applicant. How would this integral temporary feature, pending final restoration on the CEMEX site be implemented and achieved? Details on this are not evident within the Environmental Statement (ES). Please supply them.
- The locations from where mineral is to be extracted (first two years) and where extracted mineral and imported waste would be stored (prior to export or infill) throughout the 5 phases of restoration over the five year temporary period being sought (2 years mineral extraction and restoration works using imported inert waste/materials and 3 years restoration works only) has not been clearly depicted within the ES or in the ES's Technical Appendices (ESTA), specifically sections 3

and 11 in the ES and sections 1 and 10 of the ESTA. The applicant must demonstrate that this has been considered and logistically can be carried out as proposed. It shall include how the importation, processing (screening only) and infilling activities will be undertaken and contain consideration of all implications on the existing ground in terms of stabilisation and vegetation. This shall also include how the areas for vehicular parking, site infrastructure and welfare facilities and the storage/use of plant, equipment and machinery will factor into the mineral extraction operations and phased restoration works throughout the five year period.

- Infill phasing should establish when the restoration phases can be implemented to, where possible, enable parts of the site to be restored and put into aftercare prior to the final restoration phases being commenced and completed.
- Objectives of site restoration should focus on heathland restoration/creation and facilitating the establishment of the park as per Land Use Consultant's Sandgate Country Park Study (2010). Currently the proposals are mainly for acid and meadow grassland. Consideration must be given to CEMEX's approved Restoration Master Plan (Drawing no. P3 / 182/ 8 (dated Oct 2010). A copy has been included with this letter. This restoration has factored into its connectivity into and through the application site to provide access following restoration of these two quarries. Connectivity between the eastern boundary of the CEMEX site's restoration and the application site's western boundary must be considered beyond what has been proposed and shown on the submitted Restoration Scheme drawing (WP L/15 (DRAFT) (dated 10/2013).
- The submitted Restoration Scheme drawing (WP L/15 (DRAFT) (dated 10/2013) despite containing proposed footpath routes, does not include links to the existing local rights of way network, including Hampers Lane and Barns Farm Lane. The applicant must also commit to creating rights of way for future links to the adjoining Sandgate Park (CEMEX) site, on the north and south side of the lake in accordance with CEMEX's approved Restoration Master Plan (Drawing no. P3 / 182/ 8 (dated Oct 2010). This restoration has factored into its connectivity through that site to provide access following restoration of these two quarries. Alignment of proposed rights of way must be shown on any submitted plan/s

The above required information should be read in conjunction with the consultation response of WSCC's Landscape Architect (dated 31/03/14), the representation from the Sandgate Conservation Society (dated 19/02/14) and the Sandgate Country Park Study (dated August 2010) carried out by Land Use Consultants.

Noise

- A response is required to Horsham District Council's Environmental Health Department's comments on noise impacts and the need for mitigation (dated 10/02/14 and 27/03/14). It must be indicated whether this would have any impact on the conclusions made for potential impacts on sensitive receptors.
- Horsham District Council's Environmental Health Department still has concerns that developmental noise would adversely impact Chanctonbury Lodge, one of the noise sensitive locations considered within the ES (section 8) and the ESTA (section 8). Please refer to the latest response from Horsham District Council's Environmental Health Department on this matter (dated 27/03/14), which was responding to your response (dated 18/03/14). Please advise how the applicant would attempt to mitigate this impact to make it acceptable and indicate whether this would have any impact on the conclusions made for potential impacts on sensitive receptors. Please detail any proposed condition/s and any other mitigation within this response.
- The locations shown on drawings WS 8/APP/DRAWING1, WS 8/APP/DRAWING2 and WS 8/APP/DRAWING3 within section 8 of the ESTA of the proposed acoustic

barrier throughout the five year development period must be cross-referenced to comply with the requirements of the 2nd and 3rd bullet points within the **Restoration** section above.

Highways/Access

- Table 3-1, Figure 6-5 and Figure 6-6 in the ES state that there will be 36 average net daily trips by HGVs during mineral extraction and restoration works (first two years) and 25 average net daily trips by HGVs during restoration works only (the final three years). How is the total figure of 36 HGVs arrived at when the HGV trips provided are 12 and 22 respectively? Additionally, the purple box containing the figure 54000m³ marked for 'Annual Export' in Figures 6-5 and 6-6 should read 'Annual Import', I believe. Please amend here and where relevant in the other planning application documentation.
- Furthermore, Tables 6-2 and 6-3 in the ES although dealing with two-way trip HGV trip generation, provide significantly higher levels of HGV movements during both mineral extraction and restoration and restoration only when compared to Table 3-1, Figure 6-5 and Figure 6-6. This difference has caused confusion for many interested parties, and needs a clear explanation, preferably using the exact daily HGV numbers being sought throughout the two stages of the proposed five year development period.
- Clarification is required as to how the applicant's HGVs would enter and exit the site safely with respect to fellow users of Hampers Lane (a public right of way), specifically the area between the application site's access and the A283 (adjoining Hampers Lane's junction with the A283). Notwithstanding the improvement works to be carried out on and around the A283/Hampers Lane junction (as required under DC/10//1457), the comments of the WSCC Public Rights of Way officer (dated 21/01/14) should be noted, particularly with respect to the need for maintaining the legal status and condition of the public right of way (2627) throughout the development period.

Air Quality

- A response is required to Horsham District Council's Environmental Health Department's comments on air quality impacts and the need for mitigation (dated 10/02/14 and 27/03/14). It must be indicated whether this would have any impact on the conclusions made for potential impacts on sensitive receptors.
- Please confirm or otherwise whether the applicant would be willing to enter into a legal agreement to secure such HGV routing to and from the A24 to the east of the application site only. Please also indicate whether all third party suppliers would be subject to a contract with the applicant and/or subject to any required routing arrangements.

Recommended Information to be supplied (not requested under Regulation 22).

In addition to that detailed above, the County Council would also strongly recommend that the applicant investigates the following points;

- The West Sussex Waste Local Plan (WLP) was formally adopted by the County Council on 11 April 2014. The applicant should provide a full and robust appraisal of how the development is seen to accord with its intentions and policies, where necessary, drawing evidence from the ES.
- The applicant is encouraged to review consultation responses and third party representations, particularly those of the Environment Agency (dated 11/02/14), WSCC's Drainage Advisor 'Opus' (dated 02/01/14), Horsham District Council's Environmental Health Department (dated 10/02/14 and 27/03/14), WSCC's Landscape Architect (dated 21/03/14) and the Sandgate Conservation Society

(dated 19/02/14), received in respect of the planning application (available on the WSCC website) and provide responses to the key issues raised, including where any overlap with that required under Regulation 22 above.

- Section 3.26 in the Planning Supporting Statement, states that 70740 tonnes of fill material would be imported per annum over the five year period. It should read 93600 tonnes. Please amend.

Where further information is sought that would require amended plans, they should be allocated a new 'revision' number and any plans to be superseded should be identified. It is also advised that the information should be presented in a single supplementary submission.

In light of this, and with the intention of moving the application forward towards a resolution, West Sussex County Council formally requests that the further information be provided no later than **15th May 2014**. If this date is not achievable, please provide a date that West Sussex County Council can expect to receive the information.

Thank you for agreeing to extend the determination date for the application to 30th June 2014. Such is the nature of the request, further publicity and consultation will be necessary. Accordingly, there may be a further need to extend the timescale for determination if further information is required and/or planning committee cycle dates are affected for example. I will discuss this with you in advance should this again become necessary.

If you require any further clarification or if you wish to discuss the information requested, please feel free to contact me.

Yours sincerely,

Sam Dumbrell

Senior Planner
County Planning