

18<sup>th</sup> March 2014

Sam Dumbrell  
County Planning  
West Sussex County Council  
County Hall  
Chichester  
West Sussex  
PO19 1RH

Our Ref: 416.01258.00004  
Your Ref: DC/13/2460

Dear Sam,

**RE: 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 – EHO RESPONSE**

Further to consultation response from Mr Rankin (Environmental Health and Licensing Officer) dated 10<sup>th</sup> February 2014, this letter sets out our formal response to you in your capacity as case officer for this planning application.

I note Mr Rankin raises no objections to the application however raises several concerns that we have addressed below.

### Noise

Mr Rankin states that the predicted noise levels from operations at the Site are “*greater than 10dBA above the background levels recorded*” this is not the case at two out of the three noise sensitive locations considered, Table 8-3 (Chapter 8 ES) shows that the measured background noise levels are 41.0 at *The Oaks* and 53.9dB at *Chanctonbury Lodge*, Tables 8-5 and 8-6 (Chapter 8 ES) show that including mitigation the predicted noise levels are 49.6 and 53.3 at these two locations, differences of +8.6dB and -0.6dB respectively.

**Table 8-3**  
**Derived Noise Criteria, free-field, dB**

Location	Period	Measured Background Noise Level L <sub>A90</sub>	Derived Criterion, L <sub>Aeq,1hr</sub>
1 – The Oaks	Daytime	41.0	51.0
2 - Cadrona		42.7	53.0
3 – Chanctonbury Lodge		53.9	55.0

**Table 8-5**  
**Operational Assessment, free-field, dB**

Location	Predicted Noise Levels $L_{Aeq,1hr}$	Criterion, $L_{Aeq,T}$	Difference
1 – The Oaks	49.6	51.0	-1.4
2 - Cadrona	54.8*	53.0	+1.8
3 – Chanctonbury Lodge	55.1	55.0	+0.1

**Table 8-6**  
**Operational Assessment, Including Acoustic Screens, free-field, dB**

Location	Predicted Noise Levels $L_{Aeq,1hr}$	Criterion, $L_{Aeq,T}$	Difference
2 - Cadrona	53.7*	53.0	+0.7
3 – Chanctonbury Lodge	53.3	55.0	-1.7

\* Barrier positioned to the south of the dozer and excavator whilst they are operational nearest Location 1

At *Cadrona* the measured background noise levels was 42.7dB and the predicted noise level including mitigation is 53.7dB a difference of +11.0 dB; however it was noted that the background noise levels at all of the locations were measured on a Saturday afternoon (as a housing development was being constructed adjacent to the site during the week and Saturday mornings which influenced the noise climate during these periods) when the existing operational activities at the Sandpit had ceased, in reality these activities would contribute to the prevailing noise climate and potentially cause the background noise levels at all of the locations to be higher.

Mr Rankin requests that a noise limit is set at the noise sensitive properties that does not exceed the background noise level by more than 10dB, this has already been carried out in Table 8-3 of the report which shows the derived criterion for the assessment, though at Chanctonbury Lodge the EHO limit would be 63.9dB and not the NPPF limit of 55.0dB.

To sum up the limits Mr Rankin is requesting are not considered to be too onerous and the Applicant confirms that they are prepared to accept the planning condition he proposes.

#### Importation of Materials

The conditions suggested duplicate the controls which the Environment Agency already has under the permitting regime. Inert materials are all that are being applied for and the proposed testing of every load is not necessary given the controls the Environment Agency already have. Similarly the request for independent reporting is not necessary given that the Environment Agency would monitor and inspect the Site. Finally existing Site controls required as part of the permit would ensure that is if inappropriate materials are received on Site then they would be removed to a suitably permitted facility.

The proposed conditions are therefore not necessary.

#### Dust

Dust mitigation measures are already proposed as part of the planning application and this matter would be more appropriately controlled by the submission of a dust management plan.

### Air Quality

This routing is already proposed as part of the planning application and can be controlled by condition.

### General Amenity Issues

1. These hours are as proposed in the planning application;
2. There is no noise or traffic justification for restricting deliveries by the additional half an hour proposed; and
3. This is not permitted by the Environment Agency

### Summary

I can therefore confirm that the Applicant is happy to accept the noise condition proposed by Mr Rankin and for conditions to require the submission of a dust management plan and to restrict HGVs to only travelling eastbound on the A283. However the other conditions proposed are either unnecessary or duplicate the controls of the Environment Agency.

Yours sincerely  
**SLR Consulting Limited**

**John Palmer**  
Associate Planner

cc Mr Chris Foss