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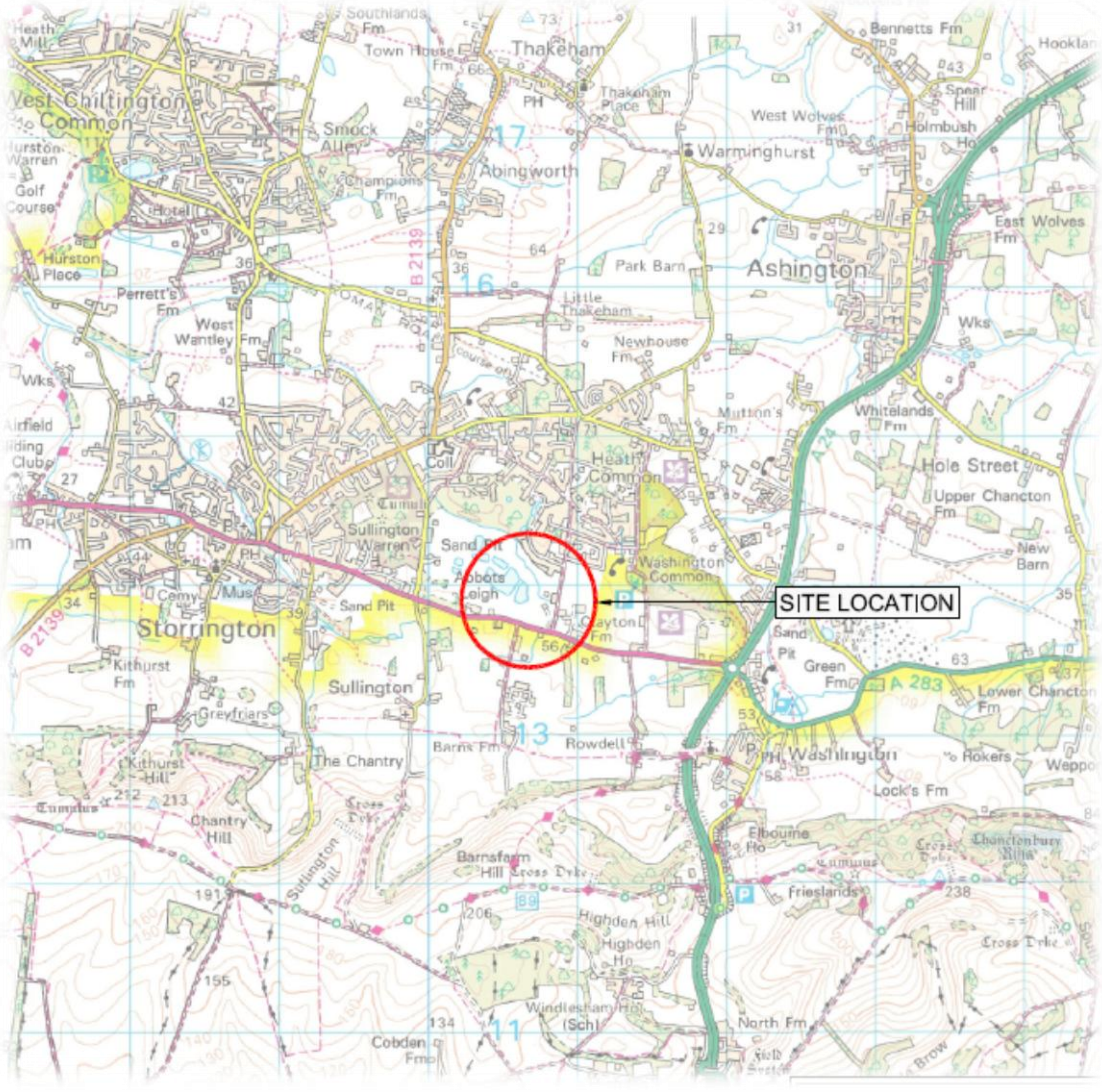
1.0 INTRODUCTION

Overview

1.1 This document comprises a Planning Supporting Statement (PSS) and has been prepared by SLR Consulting Limited (SLR) on behalf of Britaniacrest Recycling Ltd (Britania). This PSS is part of a package of documents being submitted to West Sussex County Council (WSCC) in support of a planning application in respect of revising the restoration profile at Washington Sandpit.

1.2 The application site is located at National Grid Reference TQ 10749 13796. The location is shown in Drawing 01 Site Location Plan (Please refer to Volume 1 Appendix C Proposed Drawings).

Figure 1 Site Location



1.3 Britania proposes to amend the approved restoration at the Site by continuing to extract permitted mineral reserves and receive inert material generated from sources within West Sussex to secure the restoration of the site within a 5 year timescale. This approach is reflective of the aspiration of local and national government to not sterilise permitted mineral reserves and to deal with waste at the local level.

1.4 The development is best described below:

"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"

1.5 Following the removal of up to 100,000 tonnes of permitted mineral reserves, the quarry void available for restoration is currently estimated to be 260,000 cubic metres which, based on a material density factor of 1.80 tonnes per cubic metre, would result in a need for 468,000 tonnes of clean inert waste/soil import (260,000 x 1.80 = 468,000): the material density factor has been provided by the applicant and is based on their extensive knowledge and experience.

1.6 The importation of fill material will occur by road transport given the absence of other appropriate transport networks in the vicinity of the site.

1.7 This Statement aims to provide the WSCC with further information that does not fall within the scope of the Environmental Statement (see paragraph 1.10 below). In this respect, it considers the proposed development in the light of planning policy, the need for the development and finally considers the development in terms of sustainability issues. Coupled with the Environmental Statement, this document is intended to provide the Local Planning Authority (LPA) with sufficient information to determine the planning application. Unlike the Environmental Statement, this statement is not a mandatory requirement and there are no statutory or regulatory guidelines governing the content of a PSS.

1.8 Britania is in full ownership of the application Site.

Rationale

1.9 The rationale for the submission of this planning application is therefore to:

- avoid the sterilisation of permitted reserves;
- help West Sussex to demonstrate that they are seeking to comply with national policy on maintaining landbanks;
- help West Sussex to demonstrate that suitable projects which utilise inert waste for beneficial purposes are continuing to come forward, thereby avoiding the need for inert waste landfills; and
- deliver a high quality resolution scheme in accordance with the policy aims of the Sandgate Country Park proposal.

Requirement for Environmental Impact Assessment

1.10 For any development it is important to establish if an Environmental Impact Assessment (EIA) is required at the outset. The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (hereafter referred to as the EIA Regulations) implement Council Directive No 85/337/EEC (as amended) on the assessment of the potential effects of specified development proposals on the environment.

1.11 Prior to the granting of a "*development consent*", which includes the grant of planning permission under the Town and Country Planning Act 1990, in respect of any proposal to which the EIA Regulations apply, an EIA is required. Responsibility for compiling information regarding the significant environmental effects lies with the developer, and the information is presented as an 'Environmental Statement' (ES).

1.12 As such, a comprehensive ES has been prepared by SLR and should be read in conjunction with this PSS and associated documents.

Pre-Application Advice

1.13 SLR on behalf of Britaniacrest submitted a pre-application report/request to WSCC (April 2013), which showed the site plan indicative visualisations and calculations. This was preceded by a pre-application meeting with WSCC on 29th May 2013.

Structure of Submission

Volume 1

1.14 Planning Supporting Statement (this document), including:

- An introduction to the project and planning application;
- A description of the site and planning history;
- A description of the development;
- A commentary on planning policy;
- Need;
- Climate Change
- Potential Environmental Effects and Summary of Mitigation Measures; and
- Benefits of the Development

1.15 The Planning Supporting Statement also comprises the following appendices:

- Appendix A: Planning Application Forms and Certificates (SLR);
- Appendix B: Planning Application Drawings and Site Master Plan;

Volume 2A

1.16 The following Environmental Statement Chapters consist of the following:

- Chapter 1: Introduction;
- Chapter 2: Site Description;
- Chapter 3: Description of the development;
- Chapter 4: Planning Policy considerations;
- Chapter 5: Alternatives;
- Chapter 6: Traffic and Transport;
- Chapter 7: Air Quality;
- Chapter 8: Noise;
- Chapter 9 Water Environment;
- Chapter 10 Landscape and Visual;
- Chapter 11 Ecology;
- Chapter 12 Cumulative Impact;
- Chapter 13 Mitigation Measures; and
- Chapter 14 Conclusions

Volume 2B

1.17 Volume 2A is also supported by Volume 2B which is where the supporting technical information appears within the ES as set out below:

- Technical Appendix 1 Pre Application Request to WSCC (April 2013);
- Technical Appendix 2 Pre Application Advice Letter from WSCC (July 2013);
- Technical Appendix 3 Approved Restoration Drawing Ref W41M/15A;
- Technical Appendix 4 Geotechnical Letter;
- Technical Appendix 5 Machinery Details;
- Technical Appendix 6 Traffic Appendices;
- Technical Appendix 7 Air Quality Appendices;
- Technical Appendix 8 Noise Appendices;
- Technical Appendix 9 Flood Risk Assessment;
- Technical Appendix 10 Landscape Appendices (with drawings); and
- Technical Appendix 11 Ecology Appendices.

Volume 3

1.18 A Non Technical Summary (NTS) to the Environmental Statement (ES) is provided as a stand-alone document.

Project Team

1.19 This statement has been prepared by SLR. SLR is a multi-disciplinary environmental consultant to the minerals and waste management industries, and also provides advice to local authorities and the Environment Agency on

strategic issues[1]. SLR is a registered Environmental Impact Assessor Member of the Institute of Environmental Management and Assessment (IEMA) and has achieved the EIA Quality Mark awarded by IEMA.

1.20 In preparing this planning application and ES, SLR has drawn upon the expertise of an in-house team of specialists comprising planners, landscape architects, ecologist, hydrologists and environmental scientists for the majority of the technical assessments.

Publication

1.21 Paper copies of the application package can be obtained from SLR Consulting Ltd at the following address;

Langford Lodge
109 Pembroke Road
Clifton
Bristol
BS83EU
UK

1.22 The Planning Supporting Statement, along with the Environmental Statement, is available in both paper copy and CD at a cost of £250 and £5 respectively. An electronic copy of the NTS (which accompanies the Environmental Statement) is available free of charge upon request.

[1] Further details regarding SLR Consulting Limited can be found on its web site www.slrconsulting.com

2.0 THE APPLICATION SITE, SURROUNDINGS & PLANNING HISTORY

The Application Site

2.1 The application Site comprises an area of approximately 6.5 hectares.

2.2 For identification purposes, the Site is centred on National Grid Reference TQ 10749 13796 and edged red on the plans accompanying this planning application.

2.3 The Site is located directly north of the A283 and approximately 2km east of the centre of Storrington, in West Sussex.

Figure 2-0 Approximate Site Boundary

Site Description

2.4 Washington Sandpit (previously operated by Hanson Aggregates), adjoins a much larger extraction site known as Sandgate Park operated by CEMEX UK, previously RMC Aggregates. There is no physical boundary between the two sites, both joining to form one contiguous extractive operation.

2.5 A small number of houses to the north have limited views of the Site but will not have views of the working area as the previous extraction of sand has left a deep depression in the landscape. The further extraction of sand will take place in this depression effectively screening the operations on Site. Sand screening and ancillary operations will also take place at a level lower than the surrounding ground levels.

2.6 The application site is well-screened by woodland and existing vegetation with only limited views of the site available. A small number of houses to the north have limited views of the Washington Pit.

2.7 The A283 forms the approximate boundary between two National Character Areas (NCAs), namely the South Downs and Wealden Greensand NCAs as defined by Natural England. The site is within the Wealden Greensand NCA its character to the north of the A283 but is influenced by the South Downs NCA directly to the south, which is now designated as the South Downs National Park.

2.8 The South Downs form a prominent escarpment to the south rising to over 200m AOD in elevation, running east to west, and with the crest of the ridge approximately 1.5km to the south of the site within the South Downs National Park.

2.9 To the north the ground is generally undulating with shallow valleys and low hills such as Washington Common to the northeast of the site.

Access

2.10 Access to the Site is achieved via Hampers Lane Vehicular access to the application is currently via a private haul road that connects onto Hamper's Lane some 8-metres north of the existing priority T-junction that is created where Hamper's Lane connects onto the A283-Storrington Road. This junction will be improved as part of the planning permission (DC/10/1457) which will increase the distance over which visibility is available from the junction, and increase the separation distance between the site access and the A283-Storrington Road junction.

2.11 The junction has been considered in the context of its geometry, past safety performance and swept-path analysis has been undertaken to assess whether vehicles departing the site access would block inbound traffic from the main road. The assessment concludes that the geometry of the junction is sufficient of the intended purpose, as evidenced by the recent and historic use of the access by HGVS, and there is not existing unacceptable safety risk at the junction that would indicate a deficiency in the layout of the highway.

2.12 All vehicles will arrive and depart the site from the east. Some 1.3 kilometres east of the application site, at the Washington Roundabout, the A283-Storrington Road becomes a designated lorry route. Also at this location,

access is also provided onto the A24-London Road which is also designated as a lorry route.

2.13 The location of the quarry therefore lends itself to providing proximate access onto those roads considered most suitable for lorry traffic.

Water Environment

Aquifer Characteristics

2.14 With reference to the British Geological Survey, Solid and Drift Geology Map, Brighton and Worthing, England and Wales Sheet 318/333, 1:50,000 scale, the solid geology underlying the Site is the Folkestone Formation overlain within the northern and western area of the Site by Head. This Folkestone Formation is classified by the Environment Agency as a Principal aquifer defined as having 'high intergranular and/or fracture permeability - meaning they usually provide a high level of water storage. They may support water supply and/or river base flow on a strategic scale. In most cases, principal aquifers are aquifers previously designated as major aquifer.'

2.15 The Site is located outside a Groundwater Source Protection Zone.

2.16 The Head deposit is classified by the Environment Agency as a Secondary (undifferentiated) defined as having 'previously been designated as both minor and non-aquifer in different locations due to the variable characteristics of the rock type.'

Groundwater Levels and Flow

2.17 Hydrogeological gradients (indicated upon the Hydrogeological Map for South Downs and Adjacent Parts of the Weald) would suggest that groundwater flow beneath the application site would be towards the south.

2.18 The EA confirm that they do not monitor groundwater levels or quality within 4km of the application site. With reference to the geology of Britain viewer published on the British Geological Survey website, borehole TQ11SW98 is located within the Site. However, at the time of writing, information from this borehole was not available.

2.19 Notwithstanding the above, records from 3 boreholes within close proximity to the Site are summarised in Chapter 9 of this ES which essentially indicated that groundwater table varies between 12.8m and 20.05m below ground level (bgl).

2.20 However, knowledge of current operation of the Site and the adjoining CEMEX Quarry indicates that excavation is not carried out below 17m AOD.

2.21 With ground levels across the Site varying from 58.00m to a surveyed water level of 30.15m AOD, current site operational constraints suggests a water table located some 13.15m below the lowest 'dry' area of the Site.

2.22 It is therefore likely that due to local abstraction of groundwater, the water table has been artificially lowered and it may rise to those recorded by the British Geological Survey following the restoration of the Site, without intervention, if pumping of the pond were to cease.

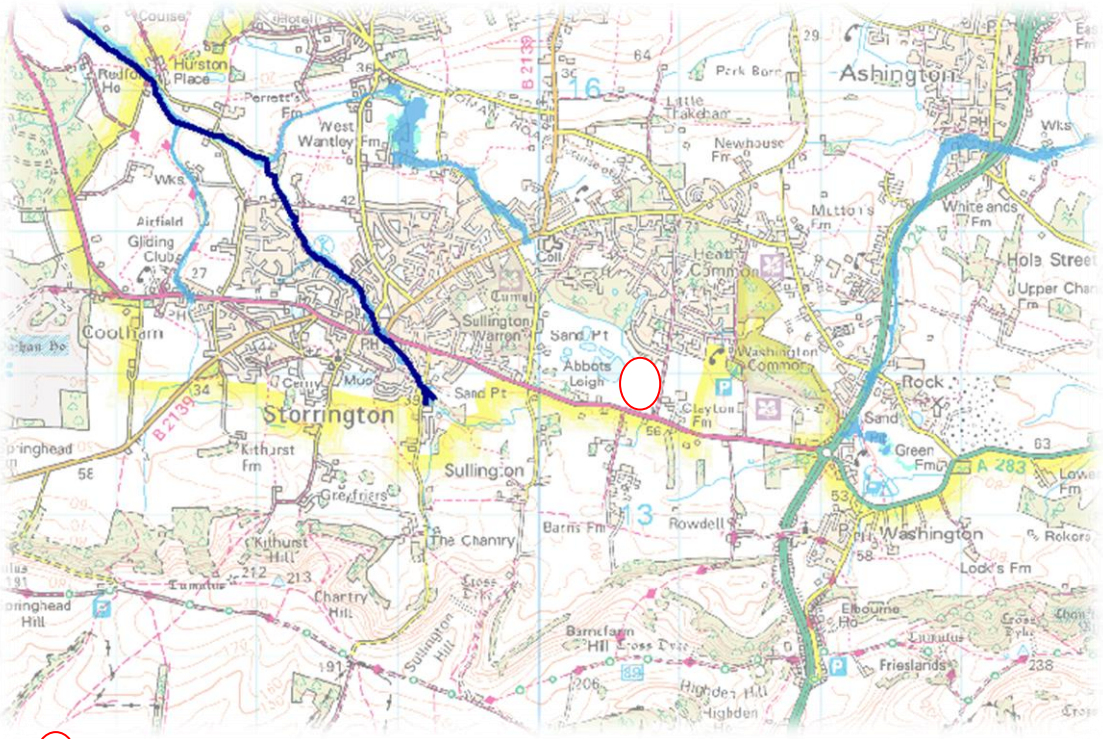
Groundwater Abstractions, Use and Quality

2.23 Based upon the EA's Groundwater Source Protection Zone mapping, the application site is located outside of all Groundwater Source Protection Zones.

Flooding and Flood Risk

2.24 Flood Zone Maps published by the EA, show that the Site is entirely within 'low probability of occurrence' Flood Zone 1 (defined as land which could be at risk of flooding from fluvial or tidal flood events with less than 0.1% (1:1,000 year) annual probability of occurrence i.e. considered to be at 'low probability' of flooding).

Fig 2-1 Flood Zone Mapping



Approximate site location

Local Hydrology

2.25 The Site lies adjacent to the South Downs National Park (SDNP) with the northern boundary of the Site defined by a tributary of the River Stor which flows in a general north westerly direction.

2.26 With reference to the 1:25,000 scale Ordnance Survey mapping, there are a number of ponds within close proximity of the Site. These appear to drain into the tributary.

2.27 No specific groundwater quality data is available for the application site and the quality of the tributary has not been assessed as part of the EA's River Basin Management Plan. However, the latter has identified the River Arun, into which the River Tor discharges, to have a moderate biological and physio-chemical quality.

Nature Conservation

Natural Areas

2.28 The site falls within the Wealden Greensand Natural Area, as defined by Natural England. The Wealden Greensand Natural Area follows the outcrop of upper and Lower Greensand which curves around the western end of the Wealden anticline in West Sussex, East Hampshire and Surrey and forms a conspicuous ridge running west to east across Surry and Kent terminating in coastal cliffs at Folkestone Warren.

2.29 The Natural Area is characterised by lowland heath that today is concentrate in West Sussex, Hampshire and western Surrey.

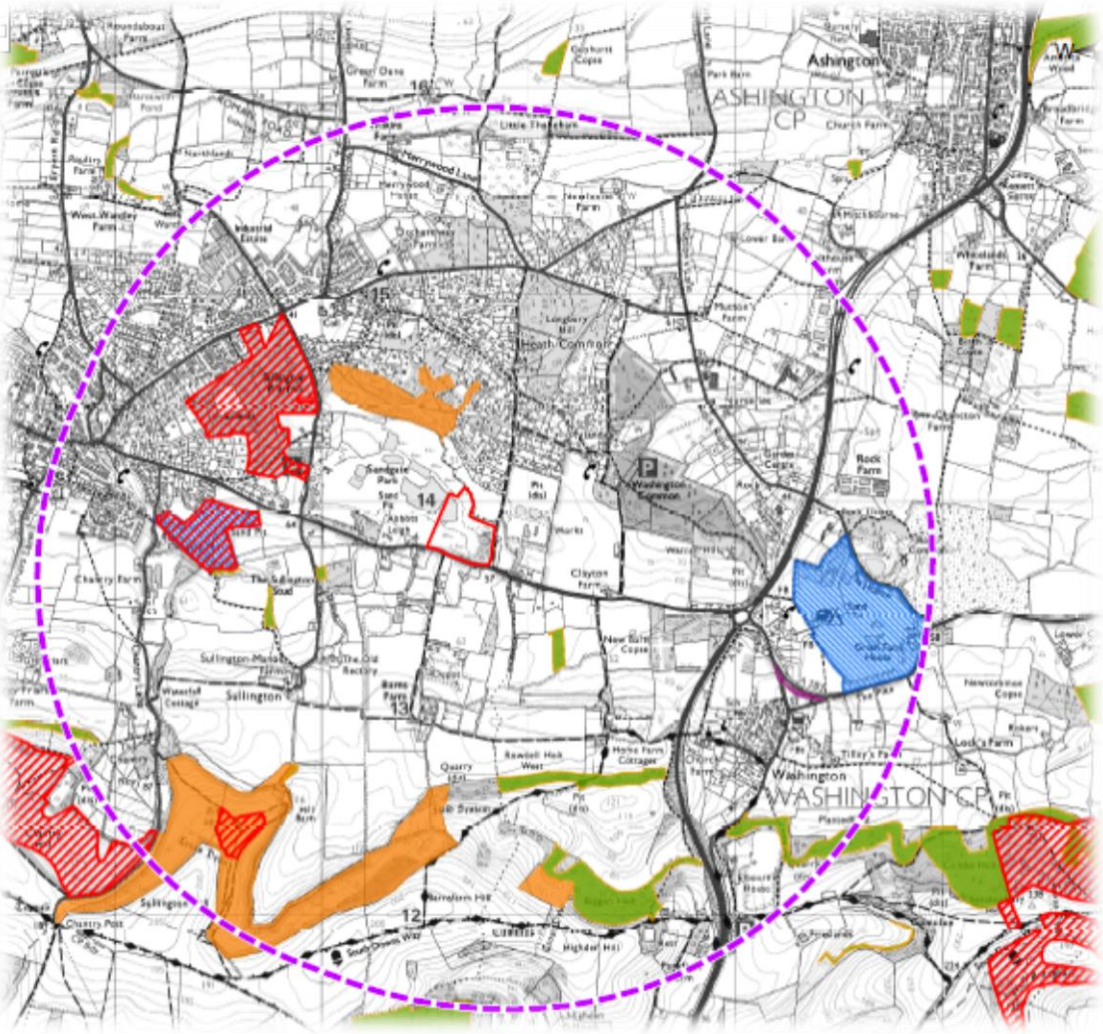
2.30 The application site does not have any statutory nature conservation designations.

2.31 There are no internationally designated statutory nature conservation sites within a 5km radius of the site.

2.32 Within a 2km radius of the application site there are three Sites of Special Scientific Interest (SSSI) namely:

- Sullington Warren SSSI;
- Chantry Mill SSSI (geological SSSI and as such not considered further in under this ecological assessment); and
- Amberley Mount and Sullington Hill SSSI.

Fig 2-2 Statutory and Non-Statutory Designated Sites



Habitats

UK Priority Habitats

2.33 According to the Natural England GIS database of UK Priority Habitats, there are several areas identified as priority habitats located within the 2km search area that include: Chalk Stream, Lowland Calcareous Grassland, Lowland Heathland, Open Water and Traditional Orchard.

2.34 The application site does not support any priority habitat except for part of the lake, identified as Open Water, that extends over the flooded pit floor of the adjacent restored sandpit to the west of the Washington Sandpit.

Landscape and Visual

2.35 The site is in or near to two National Character Areas (NCAs), as defined by Natural England, namely the South Downs (125) and Wealden Greensand (120) NCAs, with the A283 forming the approximate boundary between them. The site itself lies within the Wealden Greensand NCA to the north of the A283 but its character is influenced by the South Downs NCA directly to the south.

2.36 The South Downs form a prominent escarpment to the south rising to over 200m AOD in elevation, running east to west, and with the crest of the ridge approximately 1.5km to the south of the site within the South Downs NCA. The scarp slopes provide a backdrop to the landscape of the Wealden Greensand.

2.37 To the north within the Wealden Greensand the ground is generally undulating with shallow valleys and low hills such as Washington Common to the northeast of the site.

Characteristics of the Site

2.38 It is important to understand how the site relates to the adjacent landscape to understand how well the development might be absorbed into the landscape in the short-medium-long term.

Natural and Semi-natural Characteristics

2.39 The site is located within the undulating landscape of the Wealden Greensand area close to the South Downs escarpment.

2.40 The adjacent landscape has an elevation of approximately 59m AOD, with an access track descending down into the pit from the southeast corner of the application site. The base of the pit is currently at 26m AOD and to the west the site merges with the existing lagoons within the adjacent CEMEX sand pit.

2.41 The site boundaries to the north, east and south are generally well vegetated with hedgerows and tree growth. A variable density of hedgerows exists within the adjacent landscape, with many small areas of broadleaved woodland. Small areas of heathland are also present and these tend to be more heavily wooded. Overall the local landscape has a well wooded and vegetated appearance within the lowland areas, but becomes open with limited woodland and hedgerows on the more elevated ground rising to the South Downs in the south.

Cultural and Social Factors

2.42 The site is located within a farmed landscape of mixed arable and pasture, with predominantly small to medium-sized fields.

2.43 The site lies between the settlements of Storrington and Washington which are connected by the A283 which runs east to west. To the east the A283 forms a junction with the A24 at Washington; the A24 runs north to south and forms the main route across the South Downs near to the site.

2.44 The site has been worked for minerals historically and the latest workings represent the removal of the last areas of workable sand within the site. The active CEMEX Sandgate Quarry site to the west forms part of a larger overall sand pit with the proposed development site. The CEMEX site is largely screened by vegetation, although the plant site buildings and sand stocks are visible above the vegetation from viewpoints in the south and immediate west.

2.45 The local area has a legacy of mineral extraction with the following sites present in a band along the line of the A283 to the north of the South Downs including:

- a 'Pit (Dis)' or disused pit is marked on the Ordnance Survey 1:25,000 map directly east of Hampers Lane. The southern edge of this site is currently being developed as Milford Grange, a large residential development, with earth movements and excavations clearly visible through the hedgeline to the east of Hampers Lane;
- A large active sand pit exists to the east of the A24 called Rock Common Sandpit; and
- To the west the disused Chantry Lane Sandpit is present close to Storrington.

2.46 The residential area of Heath Common to the north is set into the wooded landscape to the north of the site. This area has a suburban character with large private houses hidden behind tall hedges and wooded belts, fences and walls.

Surrounding Area

2.47 The site is sandwiched between the settlement of Washington located approximately 1.5km to the East of the Site and the settlement of Storrington located approximately 2km to the West.

2.48 The site is in or near to two National Character Areas (NCAs), as defined by Natural England, namely the South Downs (125) and Wealden Greensand (120) NCAs, with the A283 forming the approximate boundary between them. The site itself lies within the Wealden Greensand NCA to the north of the A283 but its character is influenced by the South Downs NCA directly to the south.

2.49 The South Downs form a prominent escarpment to the south rising to over 200m AOD in elevation, running east to west, and with the crest of the ridge approximately 1.5km to the south of the site within the South Downs NCA. The scarp slopes provide a backdrop to the landscape of the Wealden Greensand.

2.50 The site boundaries to the north, east and south are generally well vegetated with hedgerows and tree growth. A variable density of hedgerows exists within the adjacent landscape, with many small areas of broadleaved woodland. Small areas of heathland are also present and these tend to be more heavily wooded. Overall the local landscape has a well wooded and vegetated appearance within the lowland areas, but becomes open with limited woodland and hedgerows on the more elevated ground rising to the South Downs in the south.

2.51 To the north within the Wealden Greensand the ground is generally undulating with shallow valleys and low hills such as Washington Common to the northeast of the site.

2.52 The nearest residential properties to the Site are the Oaks (situated to the North of the Site), Cardrona (situated on Hampers Lane to the East of the Site) and Chanctonbury Lodge situated on Washington Road to the South of the Site).

Planning History

Planning Background and History

2.53 It is understood from the previous Committee Report that an Interim Development Order (IDO) was granted in 1948 and subsequent planning permissions have been granted for site extensions and inert landfill[2].

2.54 On the 5th July 1994, a consolidating planning permission was issued under reference SG/37/93 in response to a requirement under the Planning and Compensation Act 1991.

2.55 In 1998 a Section 73 Application was made to extend the end-date of the 1994 permission to the 31st December 2008, and to vary the working scheme for the Site.

2.56 It is understood that sand extraction has continued intermittently at an extraction rate significantly less than was envisaged in the previous application.

2.57 In 1999 the achievable reserve was calculated to be 224,000 tonnes in 1999 (ref letter to B Johnson at WSCC dated 6th July 1999).

2.58 In 2008 it is understood that the reserve was estimated to be 150,000 tonnes which is dependent on the adjacent dewatering Sandgate Quarry operated by CEMEX, and could in theory extend to 250,000 tonnes if the water table was lowered sufficiently to excavate down to the permitted level of 17m AOD

[2] West Sussex County Council Committee Report, Section 3.1, Agenda Item NO. 4(b) App Ref DC/2500/08(SR)

(ref. condition 3 of Planning Permission) however this was dependent on the adjacent de-watering and lack of suitable discharge point.

2.59 The former extension of life application by Hanson was to complete the extraction of all available reserves at the Site within a 10 year period (finishing 2018), thereby avoiding the unnecessary sterilisation of a valuable resource. However, throughout the consultation period Hanson agreed to limit this period of time to only five years (2013) as at the time (pre 2008 recession) enquiries from potential customers were on the increase. Extraction throughout the last five years has unfortunately been extremely slow due to the economic down turn therefore there remains an estimated reserve of 100,000 tonnes of sand which would effectively be sterilised if an extension of time is not permitted.

2.60 Finally, in 2013 Britaniacrest Recycling Ltd applied to extend the life of extraction activities at the sandpit by a further two years up until 31st December 2015 (APNO. WSCC/086/13/SR) – at the time of writing this application is pending consideration.

3.0 DESCRIPTION OF DEVELOPMENT

Introduction

3.1 The application site would continue to extract permitted mineral reserves and receive inert material generated from sources within West Sussex to secure the restoration of the site within a 5 year timescale. This approach is reflective of the aspiration of local and national government to not sterilise permitted mineral reserves and to deal with waste at the local level.

3.2 The development is best described below:

"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"

3.3 Following the removal of up to 100,000 tonnes of permitted mineral reserves, the quarry void available for restoration is currently estimated to be 260,000 cubic metres which, based on a material density factor of 1.80 tonnes per cubic metre, would result in a need for 468,000 tonnes of clean inert waste/soil import (260,000 x 1.80 = 468,000): the material density factor has been provided by the applicant and is based on their extensive knowledge and experience.

3.4 The importation of fill material will occur by road transport given the absence of other appropriate transport networks in the vicinity of the site.

Process of the Proposed Development

3.5 The proposed development would initially see both mineral extraction and the importation of inert material for the first two years followed by a further three years of the importation of inert material to secure the long term restoration of the site to benefit the Sandgate Country Park.

3.6 The proposed development would require the importation of inert construction material to secure the long term restoration of the site to a beneficial afteruse with the focus for the site being on amenity and habitat creation.

3.7 The proposed method of achieving restoration is to import suitable inert material which would be placed in a safe and controlled manner to achieve the final proposed landform as set out in the proposed restoration scheme (see Volume 2b Technical Appendix 10 Drawings).

Mineral Extraction

3.8 The remaining sand reserves at the site are estimated to be approximately 100,000 tonnes.

3.9 Existing site operations would continue including the extraction of sand by mechanical means and transportation of this material from the site via the public road network.

3.10 A section of the completed Phase 1 site restoration has been disturbed and needs to be returned to its previously restored condition, to comply with the restoration scheme.

3.11 This operation would be carried out as part of the proposed development using on site material.

Phased Restoration

3.12 The phased restoration of the site will comprise of 5 phases each described below.

3.13 These phases and volumes are indicative only and should not be relied upon for construction purposes.

3.14 The proposed method of achieving restoration is to import suitable inert material which would be placed in a safe and controlled manner to achieve the final agreed landform.

Phase 1

3.15 Initial infilling would take place in the south west corner of the application site. In this phase the upper extent of the recently created sandstone face is retained at approximately 56m AOD with material buttressed up to 51m AOD and creating a 1(v):9(h) falling to 1(v):3(h) slope which ties into the existing landform at the western extremes of the site. The land drops away to approximately 29m AOD to the north where the landform levels reach the site boundary. This initial phase would accommodate C. 54,500 cu.m of fill.

Phase 2

3.16 The second phase of infilling would take place along the western edge of the application site to form the newly defined waterbody on the boundary with the Cemex site. The upper extent of infilling will be at 40m AOD into the site, creating a 1(v):6(h) slope across the eastern edge of the waterbody. The Cemex boundary is at approximately 27m AOD and rises to the west to a series of islands with maximum 1(v):3(h) side slopes, peaking at 40m AOD. This phase would accommodate C. 40,000 cu.m of fill.

Phase 3

3.17 The third phase involves the infilling of material to extend the Phase 2 infill eastwards towards the processing area. The level of land ranges from 40m

AOD and 49m AOD, levelling out from a 1(v):3(h) rise to 1(v):10-15(h) slopes in the east. This phase would accommodate C. 60,000 cu.m of fill.

Phase 4

3.18 The fourth phase involves the buttressing of material against the existing northern faces of the site to slacken the toe of the slope and levelling of material across the informal recreational/campsite area. A platform accommodating public access lies at 46m AOD and rises to the east to 48mAOD across the informal recreational/campsite area. Material is then buttressed up against the existing steep faces at the northern edge of the site ranging in height from 46mAOD at their base to 52m AOD, sloping at c. 1(v):8(h). This phase would accommodate C. 57,600 cu.m of fill.

Phase 5

3.19 Phase 5 would involve the final raising of levels across the south east corner of the site where the land is proposed to slope at between 1(v):3(h) and 1(v):20(h) from 49m AOD at the base of the slope to 55m AOD at the top, levelling out to 56m AOD across the picnic area platform on the southern edge. This phase would accommodate C. 48,700 cu.m of fill.

Table 3-0 Potential Volumes of Phases

Phase Number	Potential Volume (cu.m)
1	54,500
2	40,000
3	60,000
4	57,600
5	48,700
	260,800

3.20 Estimated Total Volume (cu.m) 260,800.

Proposed Restoration Scheme

3.21 The proposed development would see the importation of inert material on site in parallel with the continued working of the sand resources on site for 2 years, involving the deepening of the pit from 26m AOD to approximately 17m AOD. Inert materials would continue to be progressively used to backfill the site for a further three years starting in the south west corner and working clockwise around the site.

3.22 The land would be raised to between 36m AOD at its western edge, to 57m AOD along the existing site boundary at the southern edge. The site would be seeded and planted as per the proposed restoration scheme (drawing WP L/15 in Volume 2B - Technical Appendix 10), and so although permanent in nature, restoration works would integrate the site into its setting without issue.

3.23 No important elements of the existing landscape would be lost as a result of the proposed restoration scheme and the screening effects of trees and woodlands close to the site would be retained.

3.24 In comparison with the current permitted restoration plan, the proposed restoration generally increases the area of grassland within the site at the expense of the lake area. This allows greater scope for picnic areas and creates a larger more sheltered recreation area at the base of the access road ramp. This area has the potential to be developed as a small camping area.

3.25 The proposed restoration scheme would see some selective thinning of woodland at the south eastern corner of the site to accommodate a new parking area, as well as additional landform abutting the Cemex lake at the western edge of the site, but the scheme is contained within the existing framework of woodland at the site periphery, and uses existing features, e.g. access, carefully within the design. Therefore, the final restoration would be of benefit to the character of the wider landscape and the proposed country park.

Traffic Movements

3.26 Assuming that the importation of fill commences in 2014 and continues until 2018/019, around 93,600 tonnes of material could be expected per year of operation (468,000 / 5 = 70,720).

3.27 Vehicular access to the application is currently via a private haul road that connects onto Hamper's Lane some 8 metres north of the priority T-junction that is created where Hamper's Lane connects onto the A283-Storrington Road. Some 1.3 kilometres east of the application site, the A283-Storrington Road becomes a designated lorry route. At this location, access is also provided onto the A24-London Road: another designated lorry route.

3.28 Notwithstanding this, the recently permitted (ref: DC/10/1457) residential development located on land east of the application site includes changes to the A283-Storrington Road that will alter the access arrangements, particularly in the context of movements from Hamper's Lane onto the A283-Storrington Road.

3.29 Amongst other things, the planned improvements comprise the realignment of the A283-Storrington Road to occupy land currently used as highway verge, to the south. The result of this, in the context of the development proposals, is to increase the available visibility from Hamper's Lane along the A283-Storrington Road. It also increases the separation between the A283-Storrington Road and the existing site access from 8 metres to around 15 metres. This change will ensure that vehicles exiting the quarry will be allowed to wait at the give-way lane of Hamper's Lane without the risk of impeding traffic entering onto Hamper's Lane from the A283-Storrington Road.

3.30 The approved highway improvements are detailed further in Chapter 6 Traffic and Transport of Volume 2A.

3.31 In view of the fact the above improvements are consented under planning permission DC/10/1457, and knowing that a reserved matters planning application has been submitted, it is considered likely that the road improvements are likely to be constructed within the life of the proposed 2-year extension of quarrying operations. Hence, the improvements are considered as the baseline highway network.

3.32 Finally, material would be transported in 4-axle 'tipper' lorries carrying typical payloads of around 16/18 tonnes/9 cubic metres. The below photograph provides an example of the sort of vehicle anticipated to be used for the movement of material away from the site.

Image source: http://www.trucklocator.co.uk/trucks-for-sale/COR0011646_01l.jpg

Figure 3-0 Typical 4-axle Lorry used in Operations

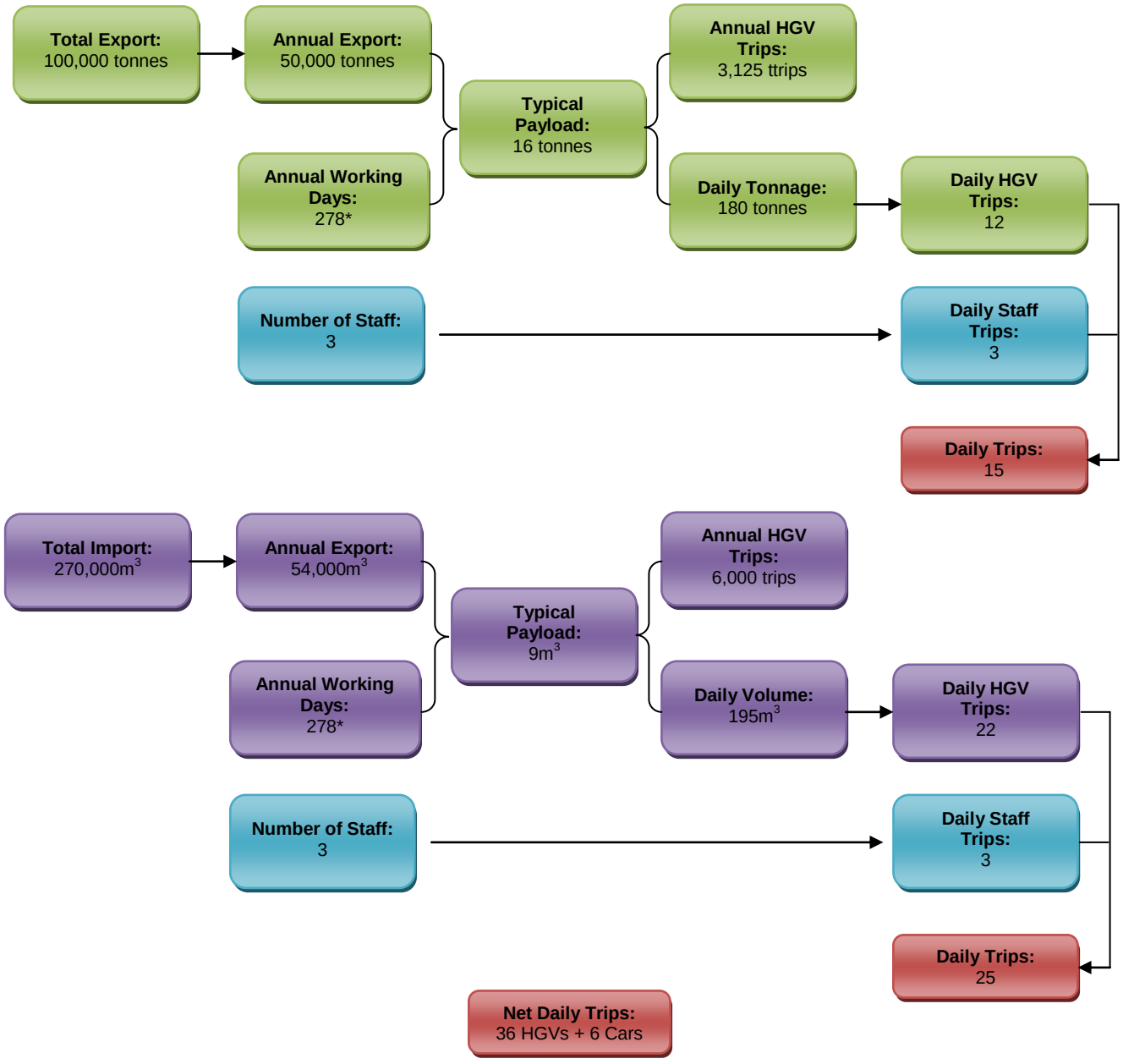
Traffic Effects

3.33 The trip generation effects of the proposed development relate to the exportation of up to 100,000 tonnes of sand over a two-year and the concurrent restoration of the site, requiring an assumed 270,000 cubic metres over a five-year period. In view of this, peak traffic generation shall occur when restoration activities occur alongside exportation of sand (years one and two). In the third to fifth year of operations, however, the trip generation will reduce to include only activities associated with the restoration of the site. Hence, for the sake of robustness, both scenarios are considered within the ES Chapter on Traffic.

3.34 The trip generation of the proposed development is determined below using first-principles assumptions, in line with best practice guidance[3].

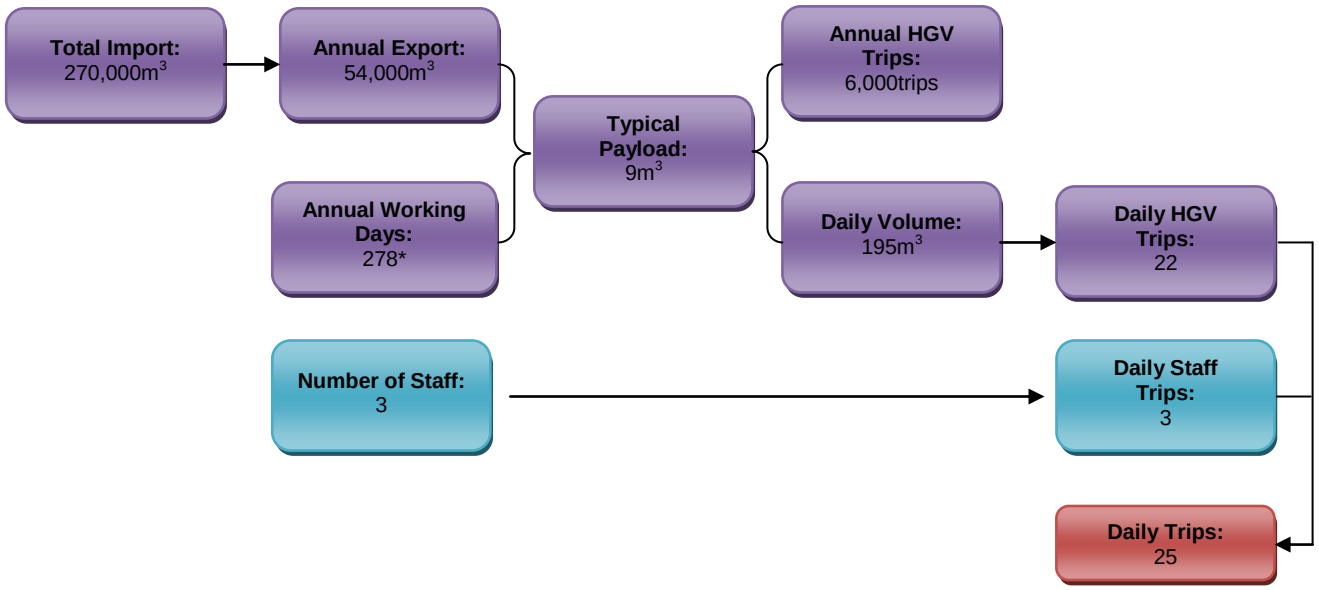
[3] Guidance on Transport Assessment, Department for Transport (March 2007).

Figure 3-1 Average Whole Day Trip Generation (One-Way) – Restoration + Exports



**Operating days calculated as 5.5 days per week x 52 weeks in the year, minus 8 bank holidays.*

Figure 3-2 Average Whole Day Trip Generation (One-Way) – Restoration Only



**Operating days calculated as 5.5 days per week x 52 weeks in the year, minus 8 bank holidays.*

3.35 It should be noted that the hours of operation on a Saturday would yield half the number of goods vehicles per day, although staff numbers would remain the same.

3.36 Taking into account the hours of operation identified above and reflecting the commercial incentives to stagger deliveries throughout the day, the following arrival/departure profile has been established. It is noteworthy that, due to statistical rounding, the sum of the hourly trip generations indicates a higher daily total than is shown above in the above Figures. Hence, the below tables should only be referenced in the context of the hourly demand.

Table 3-1 Two- Way Trip Generation Profile – Restoration + Exports

		Hour Commencing											
		07:00	08:00	09:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00
Weekday	HGVs	-	5	10	10	10	10	10	10	10	10	5	-
	Staff	6	-	-	-	-	-	-	-	-	-	-	6
Saturday	HGVs	-	5	10	10	10	5	-	-	-	-	-	-
	Staff	6	-	-	-	-	-	6	-	-	-	-	-

Table 3-2 Two-Way Trip Generation Profile – Restoration Only

		Hour Commencing											
		07:00	08:00	09:00	10:00	11:00	12:00	13:00	14:00	15:00	16:00	17:00	18:00
Weekday	HGVs	-	3	6	6	6	6	6	6	6	6	3	-
	Staff	3	-	-	-	-	-	-	-	-	-	-	3
Saturday	HGVs	-	3	6	6	6	6	-	-	-	-	-	-
	Staff	3	-	-	-	-	-	3	-	-	-	-	-

3.37 Based on the above, the over-whelming majority of traffic (75%) occurs outside of the busiest times on the highway network and, even within the traditional peak periods, the hourly trip generation is equivalent to just one HGV movement every 12 minutes in the two-year period when extraction occurs concurrent with restoration activities. Thereafter, the trip generation during peak periods is just one HGV movement every 20 minutes.

Hours of Operation

3.38 Operating times would mirror those conditioned to the existing planning permission, these being 08:00 to 18:00hrs Monday to Friday, and 08:00 to 13:00hrs on Saturdays.

3.39 No operations shall occur on Bank Holidays, or on Sundays.

Temporary Site Infrastructure

3.40 In order to complete the extraction and restoration operations the following site infrastructure is required (as set out in Technical Appendix 5 volume 2B).

- Temporary Single Storey temporary office building;
- Wheel Wash;
- Weighbridge;
- JCB Excavator;
- Cat D6T; and
- Power-screen Warrior 1400 x

Employment

3.41 Up to five full time jobs would be created at the Site.

3.42 The staff employed is expected to arrive at the site in the 30 minutes preceding the commencement of daily operations and, similarly, they would depart 30 minutes after ending operations each day.

4.0 REVIEW OF PLANNING POLICY

Introduction

4.1 It is clear from published guidance that the Government is committed to a plan led system, with the Development Plan forming the basis of all planning decisions. Section 38(6) of the Planning and Compulsory Purchase Act 2004 (PCPA 2004) confers a presumption in favour of development proposals which accord with the Development Plan, unless material considerations indicate otherwise.

4.2 Sub Section 5 of Section 38 also states that, *"if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approved or published (as the case may be)"*.

4.3 Furthermore, paragraph 5 of Planning Policy Statement 10 "Planning for Sustainable Waste Management" (2011) provides that in considering planning applications for waste management facilities before development plans can be reviewed to reflect the requirements of PPS 10, regard is to be given to the policies in PPS 10 as material considerations which may supersede policies in the development plan.

4.4 Policies in the development plan will conventionally seek to safeguard environmental interests, and will aim to resist developments which are likely to give rise to significant adverse environmental and amenity effects.

4.5 It is considered that the 'overall thrust' of the development plan, taken as a whole, and not in accordance with each policy of the plan is the key requirement when determining any application.

4.6 In the context of Section 38(6) of the 2004 Act, the relevant adopted Development Plan in this case is:

- The West Sussex Minerals Local Plan, 2003

4.7 Consideration has also therefore been given to the emerging Local Plan documents as follows:

- The West Sussex Waste Local Plan, submission version, March 2013;and
- Horsham District Planning Framework (preferred strategy stage 2013)

National Policy

National Planning Policy Framework

4.8 Paragraph 14 of the NPPF introduces the presumption in favour of sustainable development and confirms for decision taking this means:

- Approving development that accords with the development plan without delay; and
- Where the development plan is absent, silent or out of date granting planning permission unless:
- Any adverse impacts would significantly or demonstrably outweigh the benefits; or
    - Specific policies in the NPPF indicate development should be restricted.

4.9 Minerals policy in the NPPF at paragraph 142 confirms that minerals are essential to support sustainable economic growth and it is therefore important that there is a sufficient supply. In addition minerals are a finite natural resource that can only be worked where they occur so it is important to make best use of them to secure their long term conservation.

4.10 When determining planning applications, paragraph 144 advises local planning authorities that they should give great weight to the benefits of mineral extraction and to maintaining supply outside of designated areas such as national Parks and AONBs. They should also ensure that there are no unacceptable adverse impacts as a result of mineral extraction and that restoration is provided at the earliest opportunity commensurate with delivering schemes to high environmental standards

4.11 Finally paragraph 145 of the NPPF advises that local planning authorities should plan for an adequate and steady supply which includes making provision for maintaining land banks of at least 7 years for sand and gravel.

4.12 In respect of waste the NPPF confirms that whilst it does not contain specific waste policies local planning authorities should still have regard to its policies so far as they are relevant. The relevant policies to this proposal have been considered above.

Planning Policy Statement 10

4.13 Planning Policy Statement 10 (PPS 10) remains the latest Government policy on planning for waste management facilities and objectives for sustainable waste management. The proposed development has therefore been considered against these objectives (paragraph 3 of PPS10) as follows:

- Help deliver sustainable development through driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as the last option, but one which must be adequately catered for;
- Provide a framework in which communities take more responsibility for their own waste, and enable sufficient and timely provision of waste management facilities to meet the needs of their communities;
- Help implement the national waste strategy, and supporting targets, are consistent with obligations required under European legislation and support and complement other guidance and legal controls such as those set out in the Waste Management Licensing Regulations 1994; and

- Reflect the concerns and interests of communities, the needs of waste collection authorities, waste disposal authorities and business, and encourage competitiveness.

4.14 Paragraph 20 of PPS10 advises that in looking for sites waste planning authorities should consider a broad range of locations including industrial sites and opportunities to co-locate facilities. Paragraph 21 then goes to set out the matters to have regard to which include the extent to which proposals support the policies of PPS10; the cumulative effect of previous waste disposal facilities; the capacity of the local highway infrastructure; the priority given to previously developed land and the physical and environmental constraints on the site, which have been considered in the ES and set out below.

4.15 Annex E of PPS 10 sets out the main factors waste planning authorities should take into account when testing the suitability of a site for waste management purposes this is expanded upon in Volume 2A Chapter 4 Planning Policy. :

Local Policy

West Sussex Mineral Local Plan 2003

4.16 The West Sussex Minerals Local Plan identifies the following considerations with regard to the proposed development site and its context.

"para. 4.4 The Mineral Planning Authority considers that in West Sussex preference should be given to extraction outside areas protected by statutory designation. However, there are areas of more local conservation importance, and other areas of countryside which while having no special protection are enjoyed and valued for their own sake. Nevertheless, these areas would not be afforded the same degree of protection as those with statutory designations."

4.17 And

"Policy 19: In considering planning applications for mineral extraction attention will be given to the effect upon residential and other amenity, measures to mitigate the impact."

4.18 The proposed development site is outside the South Downs National Park but close enough to the boundary to have the potential for indirect effects on the park landscape. The site is within approximately 150m of residential properties to the north making Policy 19 relevant.

4.19 In terms of restoration the Minerals Local Plan states;

"Policy 20: Planning permission for mineral extraction will only be granted where proposals for reclamation would be practical and appropriate for the location, and that reclamation would be completed at the earliest opportunity"

"The reclamation of mineral sites can present opportunities to provide new water related features including recreation facilities, landscape enhancement and wildlife habitats. Such opportunities exist at Sandgate Park at Sullington Warren near Storrington."

4.20 Washington Sandpit is part of the Sandgate Park area and thus the above policy is considered to be particularly relevant.

4.21 Policy 29 of the Plan commits the mineral planning authority for the period after 2006 to provide a land bank for the period 2006 to 2013 at a rate of 880,000 tonnes a year.

4.22 Policy 34 also allows for small extensions where sterilisation of mineral resources would be avoided and an environmental benefit would occur.

4.23 A review of the West Sussex Annual Monitoring Report 2011/12 identifies the aggregate landbank of sites with valid planning permission for mineral extraction (at the end of 2011) is 5.6 years, compared with the minimum 7 years recommended in the NPPF.

4.24 The proposed development would therefore meet an identified need and avoid the sterilisation of permitted reserves.

The West Sussex Waste Local Plan, Submission Version, March 2013

4.25 The West Sussex Waste Local Plan, at paragraph 2.10.12, identifies a theoretical shortfall in new inert landfill capacity of between 3.6 to 5.4 million tonnes over the plan period but considers that on current evidence that much inert material is being used for beneficial purposes and therefore the need for new capacity is likely to be substantially less. Such beneficial purposes include the restoration of mineral workings.

4.26 Policy W9 of the Plan deals with inert waste disposal but this policy was subject to much debate and proposed amendment at the recent Examination in Public and must therefore be considered to have very limited weight.

Horsham District Council Local Development Framework

4.27 This document identifies a site specific allocation of land covering Washington Sand Pit.

4.28 The relevant policy (AL 19) states that:

"The Council will seek to secure the Sandgate Park area, as shown on the Proposals Map, for the formation of a Country Park as soon as it is practical to do so, taking into account the requirements for mineral extraction. Proposals that could assist in the formation of the country park will be encouraged. Development proposals not directly associated with mineral extraction that could prejudice the formation of the Country Park will not be permitted".

4.29 The area identified covers the majority of the Sandgate Park area of land, to the north of the A283 between Water Lane to the west and Hampers Lane to the east. This includes the existing CEMEX sand pit as well as the Washington Sand Pit site.

4.30 The supporting text for Policy AL19 states in paragraph 3.68 that;

"Although sand extraction may continue for many years yet, and probably beyond the plan period, it is essential that the proposed future Country Park use is not prejudiced by development proposals that inhibit its implementation and that provision is made to encourage proposals that could assist in creating a Country Park as soon as it is practicable to do so".

4.31 And in paragraph 3.65

"There is scope to create a variety of formal and informal recreation uses following sand extraction at Sandgate Park between Water Lane and Hampers Lane. The grading and landscaping process with respect to lagoons in the east of the site has already begun. These areas could be used for informal recreational purposes as well as fishing and water sports such as windsurfing. There is a need for small campsites for "backpackers" within easy reach of the South Downs Way and also a hostel or "bunkhouse" accommodation, providing simple dormitory and self-catering facilities. It is considered that Sandgate Park could provide such facilities given its proximity to the South Downs Way, just half a mile away. Sandgate Park could also be a suitable location for additional active sports provisions such as football pitches."

4.32 The intention of Policy AL19 is to absorb Washington Pit into the proposed country park area after its final restoration. Drawing WP L/15 and the accompanying Landscape Restoration Management Plan identifies how the objectives of Policy AL19 have been met in detail.

4.33 The proposed restoration scheme seeks a balance between enhancing the nature conservation of the site and the public access and enjoyment of it and the wider country park objective. Retained sandstone faces provide valuable habitats for sand martins as well as insects, whilst areas of acid grassland and meadow provide valuable habitats and foraging grounds, as well as visual interest and suitable year round locations for informal recreational activities such as walking and picnicking.

4.34 The existing local framework of broadleaved woodland is to be reinforced. Footpaths are strategically positioned to allow safe public access to water's edge environments and vehicular movements are to be restricted, save for maintenance access, to the south eastern edge of the site.

South Downs National Park Partnership Management Plan

4.35 The management plan contains a number of general policies of which the most relevant is Policy 1, which states;

"Policy 1. Conserve and enhance the natural beauty and special qualities of the landscape and its setting, in ways that allow it to continue to evolve and become more resilient to the impacts of climate change and other pressures."

4.36 Of note in Policy 1 is the reference to setting. The proposed development site is located at the foot of the escarpment and forms a component of the landscape for the adjacent section of the national park. This means giving particular attention to any effects on the character and quality of the landscape setting of the National Park, as well as on views from it.

4.37 The management plan refers to mineral development in section 2.10 as follows;

"The need for new mineral workings is being addressed through the joint minerals and waste local plans that are being developed with the County Councils. …The plans will all contain policies to ensure that any applications for minerals development within the National Park will include conditions requiring the progressive restoration and aftercare of the site to the highest standard."

4.38 Mineral related policy is thus generally contained within the West Sussex Minerals Local Plan, as noted above.

5.0 NEED

Introduction

5.1 This section covers both the need for the mineral and need for suitable restoration projects in West Sussex to be available to ensure that it's inert waste arisings can be managed.

Minerals

5.2 Paragraph 145 of the NPPF advises that local planning authorities should plan for an adequate and steady supply which includes making provision for maintaining land banks of at least 7 years for sand and gravel.

5.3 West Sussex's latest Annual Monitoring Report for 2011/12 confirms at Chapter 2 that the landbank of sites with valid planning permissions (as at the end of 2011) is 5.6 years. This figure should already include the reserves at Washington as the site has a valid planning permission until the end of 2013. However if permission is not extended to allow the extraction of the estimated 100,000 tonnes of sand remaining these reserves will be lost and the County's landbank will reduce further below the level required by national policy.

5.4 West Sussex is not therefore complying with national policy to maintain a 7 year landbank and if permission is not extended to allow the extraction of these remaining reserves they will be sterilised.

5.5 Therefore there is a clear need for the mineral reserves that would be released by the proposed development and paragraph 144 of the NPPF advises local planning authorities that they should give great weight to the benefits of mineral extraction and to maintaining supply outside of designated areas such as National Parks and AONBs, which is the case at Washington.

Inert Wastes

5.6 In respect of inert waste the emerging West Sussex Waste Local Plan (submission version March 2013) at paragraph 2.10.12, identifies a theoretical shortfall in new inert landfill capacity of between 3.6 to 5.4 million tonnes over the plan period but considers that on current evidence that much inert material is being used for beneficial purposes and therefore the need for new capacity is likely to be substantially less.

5.7 Such beneficial purposes are considered to include the restoration of mineral workings and paragraph 144 of the NPPF advises local planning authorities that they should ensure that restoration is provided at the earliest opportunity commensurate with delivering schemes to high environmental standards. Given the location of this site adjacent to the National Park and with the local policy framework identifying it as part of a future Country Park it is clearly important that a restoration scheme of the highest standard is delivered.

5.8 The supporting text for Policy AL19 of the Horsham District Local Development Framework recognises in paragraph 3.68 that mineral extraction and restoration works will continue here for many years, so the proposed 5 year timescale is not considered to conflict with the objective of delivering the Country Park:

"Although sand extraction may continue for many years yet, and probably beyond the plan period, it is essential that the proposed future Country Park use is not prejudiced by development proposals that inhibit its implementation and that provision is made to encourage proposals that could assist in creating a Country Park as soon as it is practicable to do so".

5.9 And in paragraph 3.65 the local policy framework identifies some of the features that it would like to see the mineral restoration schemes deliver:

"There is scope to create a variety of formal and informal recreation uses following sand extraction at Sandgate Park between Water Lane and Hampers Lane. The grading and landscaping process with respect to lagoons in the east of the site has already begun. These areas could be used for informal recreational purposes as well as fishing and water sports such as windsurfing. There is a need for small campsites for "backpackers" within easy reach of the South Downs Way and also a hostel or "bunkhouse" accommodation, providing simple dormitory and self-catering facilities. It is considered that Sandgate Park could provide such facilities given its proximity to the South Downs Way, just half a mile away. Sandgate Park could also be a suitable location for additional active sports provisions such as football pitches."

5.10 The proposed restoration scheme therefore seeks a balance between enhancing the nature conservation of the site and the public access and enjoyment of it and the wider country park objective. Retained sandstone faces provide valuable habitats for sand martins as well as insects, whilst areas of acid grassland and meadow provide valuable habitats and foraging grounds, as well as visual interest and suitable year round locations for informal recreational activities such as walking and picnicking. Drawing WP L/15 and the accompanying Landscape Restoration Management Plan identifies how the objectives of Policy AL19 have been met in detail.

5.11 There is therefore both a need for the capacity that this site would provide to ensure that West Sussex can continue to manage it's inert waste arisings and a need for the inert waste to deliver the type of restoration scheme that is sought by policy AL19.

Summary

5.12 The proposed development will therefore:

- avoid the sterilisation of permitted mineral reserves;
- help West Sussex to demonstrate that they are seeking to comply with national policy on maintaining landbanks;

- help West Sussex to demonstrate that suitable projects which utilise inert waste for beneficial purposes are continuing to come forward, thereby avoiding the need for inert waste landfills; and
- deliver a high quality restoration scheme in accordance with the policy aims of the Sandgate Country Park proposal.

6.0 CLIMATE CHANGE

Introduction

6.1 The NPPF sets out how planning should contribute to reducing emissions and stabilising climate change and also how new developments should be designed to reduce risk from climate change. This section considers the possible climate change impacts derived from the proposed revised restoration at Washington Sandpit.

6.2 The potential impact on climate change has been considered throughout the design process, with particular regard to Surface Water Management.

Surface Water Management

6.3 The most recent advice on climate change is reported in TG Table 5: *Recommended national precautionary sensitivity ranges for peak rainfall intensities, peak river flows, offshore wind speeds and wave heights*. This advice confirms that peak rainfall intensity, sea level, peak river flow, offshore wind speed and extreme wave heights are all expected to increase in the future. The TG recommends that considerations for future climate change are included in Flood Risk Assessments for proposed developments.

6.4 As such, in accordance with the advice contained within the TG, the Site is likely to be subject to increases in rainfall intensity of 30% over the lifetime of the development (deemed, in this instance, to be 100 years). Peak river flows are predicted to increase by 20% over the same period.

6.5 The associated FRA (technical appendix 9 Volume 2B) has shown that the Site is remote from any identified floodplains or from areas that have been subject to flooding historically.

6.6 It is not anticipated, therefore, that an increase in rainfall intensity attributable to the possible effects of climate change will increase flood risk at Site during the proposed life of the development.

Summary

6.7 Following the restoration of the Site, there will be an uplift in the impermeable coverage and, therefore, rates and volumes of runoff would be increased, if left unmitigated. It is proposed that this uplift along with that resulting from climate change impacts be negated through the use of the existing pond.

6.8 As the pond will continue to be pumped, off site discharge will be controlled in line with the requirements of the relevant existing discharge consent and the future Environmental Permit. However, in the event of failure of the pump, preliminary calculations indicate a surface water runoff volume of 13,269m3 generated during a 1% annual probability rainfall event inclusive of an allowance for climate change (+30%). Assuming a water level of 40m AOD at the start of the rainfall event, the pond has been estimated to have a

conservative capacity of 300,000m3 and is therefore deemed able to accommodate unattenuated surface water runoff from both the Site and the adjoining CEMEX Quarry site.

6.9 Having regard to the above, it is considered that the revised restoration has been designed to tackle causes of climate change and is therefore sustainable.

7.0 POTENTIAL ENVIRONMENTAL EFFECTS

7.1 This section sets out a summary of the potential environmental effects and a summary of the main mitigation measures for the proposed development.

7.2 One of the main aims of the associated ES is to develop mitigation measures to avoid, offset or reduce the significant adverse effects of the development.

7.3 The pertinent issues related to the proposed development are considered to be as follows:

- ensuring that there are no adverse effects from dust generated by the proposed operations;
- potential adverse landscape and visual impacts;
- potential increase in traffic on the surrounding road network;
- potential adverse impacts on the local environment in terms of noise, potential adverse impacts on hydrology;
- potential adverse impacts on ecology; and
- the potential cumulative impacts associated with the proposed development.

Traffic and Transport

Potential Effects

7.4 An assessment of the potential impacts of the proposed development on the local highway network has been undertaken. The transport assessment has considered the potential for impact on highway capacity, road safety and pedestrian/cyclist/public transport amenity.

7.5 Existing highway conditions and accident records have been assessed and the current highway layout is considered to be suitable for the purposes of the proposed development.

7.6 The findings of the assessment may be summarised as follows:

- The Site currently has a temporary planning consent to extract material until December 2013. The development considered comprises the continuation of extractive activities and concurrent restoration works until December 2015 and then restoration works only until 2018. The restoration works will require in total the importation of 270,000 cubic metres of material.
- The geometry and safety risks associated with the existing highway network have been appraised and the Chapter has concluded that there is no deficiency in the layout of the highway that is contributing to an adverse safety risk. Nor is there any evidence that suggests that the operation is materially contributing to the safety performance of the network.
- In line with scoping discussions, the trip generation of the construction and operational phases of development have been considered against a

baseline scenario that omits the trip generation of the existing facility. The trip generation has been calculated on a first principles basis to reflect the average situation throughout the year.

- The relative increase in traffic has been considered in the context of IEA Guidance and it has been concluded that any change is immaterial in the context of the environmental effects of transport, and that this is particularly the case given that there are no sensitive receptors within the study area.
- A review of accidents was undertaken for a five-year study period which confirmed no unacceptable safety risk on any part of the highway network.
- Capacity analyses were undertaken of the Hamper's Lane / A283-Storrington Road junction and this indicates that the junction will operate with around 90% reserve capacity in the 2019 baseline scenario, and that this would broadly remain the same with the development in place.
- It is the conclusion of the Traffic Assessment that the proposed development could be adequately accommodated without any material detriment to the operation of the highway network or the environment.

Summary of Mitigation Measures

7.7 It is considered therefore that the proposed development could be adequately accommodated without any material detriment to the operation of the highway network or the environment and therefore no mitigation measures are considered necessary.

Air Quality

Potential Effects

7.8 An assessment of the air quality impacts associated with the proposed development has been undertaken.

7.9 This assessment has considered the potential impacts of the proposed restoration proposals for Washington Pit and the extension of the extraction works in which sand extraction would continue for the first two years of the proposed five year restoration plan. The simultaneous operations of both excavation and restoration have been considered within the assessment.

7.10 Impacts on local air quality from traffic emissions have been assessed using the DMRB criteria. Based upon the calculated traffic generation throughout the five year proposal, HDVs associated with the application site would remain at levels by which the impact on local air quality would be 'neutral'.

7.11 The transport scheme for the proposed development would ensure that all HDV traffic associated with the works would access and exit the site from the east. This would ensure that no HDV traffic is allowed to access or travel though the village of Storrington and the Storrington AQMA.

7.12 The potential dust impacts of the development have been assessed in terms of the risk of PM10 impact for which Air Quality Standards exist, and the risk of fugitive dust impact which is associated with amenity issues.

7.13 An assessment of PM10 has been completed following guidance within LAQM.TG (09) which takes into consideration background PM10 levels and distance to receptors. On the basis of the low background levels and that there is no record of complaints to Horsham District Council or the operator, it is considered that the proposed restoration works would generate an insignificant impact on local PM10 levels.

7.14 A semi-quantitative assessment of deposited dust was undertaken to identify whether any of the identified receptors in the area surrounding the application site were at risk of dust impact from the proposed activities. Consideration within the assessment was given to the distance of the receptor from the site boundary, the frequency of wind directions that would increase the risk of dust impact and rainfall patterns that would assist in dust suppression.

7.15 Five of the seven receptors located within 500m of the application boundary were found to be at risk of dust impact in the absence of dust control measures being employed on site. The potential for dust impacts on the nearby ecological sites were assessed with the potential dust impacts assessed as insignificant on the basis that effective dust control was implemented on site.

7.16 All potential dust impacts from the proposed restoration scheme are considered to be reversible i.e. the risk of impact will cease on completion of activities on site. The magnitude of release is comparable to those within the approved 2 year restoration scheme but over a longer period of an additional 3 years.

7.17 The impacts are considered to be short term (reflecting the proposed 5 year duration) with no significant impacts on the local air quality

Summary of Mitigation Measures

7.18 The dust impact assessment has identified the need for additional mitigation measures to reduce the risk of impact at the identified receptors all of which are located within 100m of the site boundary. Due to the assessment using the entire application area as a potential dust source, the percentage of winds which would blow from the direction of Washington Pit towards each respective receptor are significantly higher than if the assessment used the areas of potentially dusty activities alone. Due to the lack of knowledge of these activities over the 5 year period a worst case scenario has therefore been undertaken.

7.19 Mitigation measures would therefore be required on site to reduce the risk of the generation of fugitive dust, or to minimise the transfer of airborne dust beyond the site boundary.

7.20 As the site is currently operational as an active sand quarry, a number of dust mitigation measures employed on site would continue to be employed during the proposed restoration works.

7.21 These would include the following:

- minimise drop heights during unloading activities;
- use of water sprays on material as and when required;
- temporary storage mounds of soil to be a maximum of 2m in height;
- soil stripping and replacement to be undertaken in strips to minimise the area of disturbed / exposed soils;
- no heavy wheeled machinery / plant to run over in-situ. undisturbed or replaced soils;
- seeding / planting of restored areas as soon as practicable;
- routine inspection and maintenance of plant dust suppression equipment;
- limit the construction of stockpiles during dry and windy weather;
- locate stockpiles away from internal haulage routes;
- locate stockpiles away from site boundary and sensitive receptors where practicable;
- avoidance of prolonged storage of materials onsite prior to use / disposal;
- aggregation of stockpiles where possible to avoid the generation of many, smaller stockpiles;
- seeding of all long-term stockpiles of soils or overburden;
- location of mobile screening plant in a central location, away from the site boundaries;
- water source on site at all times to moisten surfaces of stockpiles during dry and windy weather conditions;
- speed controls implemented and enforced on all internal haul roads;
- routine maintenance of all onsite vehicles;
- regular inspection and maintenance of internal haulage roads and access road;
- wheel wash located at weighbridge to be used by all exiting vehicles;
- regular inspection for signs of track-out on local roads in vicinity of site access to and removal of any dust deposits;
- temporary cessation of site activities in the event that unacceptable dust emissions can be seen crossing the site boundary in the direction of sensitive receptors; and
- a trained site manager (or his deputy) on site during working hours responsible for the effective implementation of dust control measures.

7.22 Additional measures that have been identified as effective mitigation measures during the proposed restoration works are the retention of the existing woodland along the south-western, southern and eastern boundaries and the working of the application site in a five distinct phases.

7.23 As described n the Air Quality Chapter, there have been no complaints received with Horsham District Council or Britannia Crest Recycling Ltd in the last 2 years in relation to dust emissions.

Noise

Potential Effects

7.24 The assessment has considered the potential operational proposals to give rise to noise impacts at the closest noise-sensitive receptors.

7.25 The NPPF assessment has shown that;

- Predicted noise levels from continued extraction operations and the import and processing of material would meet the derived criteria at Location 1 and exceed the criterion at Locations 2 and 3 (please refer to Technical appendix 2B Section 8)

Summary of Mitigation Measures

7.26 In view of the above mitigation measures in the form of the erection of temporary screens around the area where the dozer and excavator are working are recommended in order to reduce the identified impacts at Locations 2 and 3 (please refer to Technical appendix 2B Section 8).

7.27 Assuming the screens have been correctly erected the repeated NPPF shows that the predicted noise levels would now be within the derived criteria at Location 3 but would still slightly exceed the criterion at Location 2.

7.28 However it is considered that noise should not pose a material constraint to the import and processing of material at the site once the following points have been taken into account;

- The noise surveys were undertaken on a Saturday afternoon when existing operations at the Washington Sandpit had ceased;
- In reality noise from existing operations would contribute to the noise climate during normal operational hours; consequently it is considered that the prevailing noise levels at Location 2 would be higher during a normal working week;
- The higher prevailing noise levels would mean that the specified noise criterion at Location 2 would also increase potentially meaning that the predicted noise levels would subsequently be within the noise limits;
- the predicted noise levels at Location 2 are still below the maximum limit of 55dB LAeq,1hr during the daytime (07:00 to 19:00 hours) specified in the Technical Guidance to the NPPF; and
- all the noise predictions are based on a worst-case situation when all the plant is working at its nearest approach to each noise sensitive receptor and during the initial period of the development when extraction and infilling activities will take place simultaneously. Once the extraction activities have ceased the predicted noise levels will almost certainly be lower at all the nearest noise-sensitive receptors

Water Environment

Potential Effects

7.29 The potential impacts of the proposed processing/recycling and restoration scheme upon the baseline hydrological environment have been identified and assessed, and where appropriate, mitigation measures have been accommodated into the design of the proposal.

7.30 All aspects of the operation of the Site would be in accordance with best practice guidance.

7.31 A Flood Risk Assessment (FRA) has been undertaken for the proposed development. The FRA concluded that the application site is presented as being deliverable and highly sustainable in flood risk terms, and that key requirements set out within the NPPF and local planning policies may be adequately satisfied.

7.32 Appropriate SUDS measures would be incorporated into the scheme to ensure surface water runoff from the proposed development is managed in a robust and sustainable manner.

Summary of Mitigation Measures

7.33 Various best practice techniques would be incorporated within the management procedures fo r construction and operation activities on site in order to protect the water environment from pollution incidents.

7.34 A number of operational mitigation measures and best available techniques have been incorporated into the scheme design, which would reduce the potential risk to ground and surface water.

7.35 Best practice techniques would be incorporated within the management procedures for construction and operation activities onsite in order to protect the water environment from pollution incidents. The mitigation measures can be summarised as follows:

- during construction there would be heavy plant and machinery required on site and as a result it is appropriate to adopt best working practices and measures to protect the water environment, including those set out in the Environment Agency's Pollution Prevention Guidance (PPG1);
- in accordance with PPG2 all above ground on-site fuel and chemical storage would be bunded;
- an emergency spill response kit would be maintained on site;
- a vehicle management system / road markings would be put in place wherever possible to reduce the potential conflicts between vehicles and thereby reduce the risk of collision; and
- a speed limit would be imposed on site to reduce the likelihood and significance of any collisions

7.36 The above measures would significantly reduce the likelihood of pollutants being discharged from the Site, such that the overall risk is reduced to 'low'.

7.37 The proposed processing/recycling and restoration scheme would also be subject to an Environmental Permit, the application for which would include appropriate measures to avoid unacceptable impact on the environment including water.

7.38 Furthermore, the site design and mitigation measures would ensure that there is a low or negligible risk of discharge of hazardous substances (e.g.

mineral oil) to groundwater or that the proposed operations would cause pollution of groundwater as a result of discharge of non-hazardous substances.

Surface Water

7.39 Sustainable drainage systems (SuDS) would be implemented across the Site in line with the requirements of the NPPF and best practice to satisfy surface water management and water quality criterion and objectives.

7.40 However, the north eastern area of the Site is currently underwater forming a water body extending onto the adjoining CEMEX UK site and currently used as part of their operations. It is our understanding that this pond will be retained as part of the restoration scheme with a pumped outfall into adjacent watercourse(s) to maintain a designed water level of approximately 38.00m AOD.

7.41 It is proposed that the potential increase in rate and volume of runoff from the restored landform and proposed processing/recycling be negated through the use of the existing pond. As the pond will retain a pumped outfall, off site discharge will be controlled in line with the relevant discharge consent and Environmental Permit. The management of the pond, including discharge permit and operation, will continue to operate under Riparian Law.

7.42 In addition to the above, it is proposed that a network of swales be provided within the design of the restoration scheme to provide surface water quality benefits in the form of pre-treatment. The proposal is to provide a series of swales to capture surface water runoff from the restored landform prior to its discharge into the existing pond.

7.43 The FRA (Technical Appendix 9/Volume 2B) provides details of the proposed surface water management.

Landscape

Potential Effects

7.44 A landscape and visual appraisal of the proposed development has been completed in accordance with accepted guidance and methodology.

7.45 A study of the landscape and visual components of the site and the local area was undertaken through desktop study and fieldwork. This study identified the main landscape and visual receptors and resulted in a baseline appraisal, against which the existing and proposed landscape and visual impacts could be assessed. The main landscape and visual implications of the development and their predicted effects were then identified.

Landscape Effects

7.46 Direct landscape effects caused by the proposed development are minimal given that it is already an operational site. No new elements of the landscape

will be lost and because of the screening effects of trees and woodlands close to the site, the proposals will have no influence, either direct or indirect on the character of the landscapes within which the site is situated.

7.47 Perceived landscape effects outside the site are also limited due to the enclosed nature of the site and screening provided by the peripheral vegetation.

7.48 The extension of operations on site for a further 5 years would have a slight adverse effect on the wider landscape in terms of HGV movements to and from the site, however this would not be permanent.

7.49 Wider effects on the landscape would be Moderate/minor in the worst case; in relation to Policy AL 19 and relates to the delay in implementing restoration of the full site and the long term aspirations of that policy. However, in the long term the proposed development would result in a restoration scheme which matures to adequately reflect the objectives of the aforementioned policy.

No significant landscape effects have been identified.

Visual Effects

7.50 The viewpoint analysis demonstrates that the proposed development would have a minimal visual effect across the study area, due to vegetative screening. This effect would be limited to the extension of glimpsed views of continuing operations on site over an additional 5 year period, and includes views of the phased restoration of the site, at which time the resultant landform and vegetation will closely assimilate with the surrounding area.

7.51 The most notable effects would be:

- the glimpses through peripheral vegetation from Cadrona/Hampers Lane (Moderate);
- the effects visible from The Oaks (Moderate); and
- potential views from other properties to the northwest of the Oaks with similar open aspects (worst case Moderate).

7.52 Visual effects on other viewers within the vicinity of the site would be Moderate/minor or minor in nature and largely neutral during working of the site but neutral to beneficial following the long term establishment of the proposed restoration scheme.

7.53 Visual effects on users of the South Downs National Park to the south would be negligible if perceivable.

No significant visual effects have been identified.

Summary of Mitigation Measures

7.54 A Landscape Restoration Management Plan (LRMP) has been provided please see Technical Appendix 10 Volume 2B.

7.55 The main aims and objectives of the LRMP are to conserve and enhance the character and ecology of the local area in line with the West Sussex County Council Landscape Management Guidelines (2003), as well as maintaining and enhancing the overall integrity of the Sandgate park area and proposals for a country park in line with Horsham District Council LDF Policy AL19, as follows (paragraph 3.65):

"There is scope to create a variety of formal and informal recreation uses following sand extraction at Sandgate Park between Water Lane and Hampers Lane. The grading and landscaping process with respect to lagoons in the east of the site has already begun. These areas could be used for informal recreational purposes as well as fishing and water sports such as windsurfing. There is a need for small campsites for "backpackers" within easy reach of the South Downs Way and also a hostel or "bunkhouse" accommodation, providing simple dormitory and self-catering facilities. It is considered that Sandgate Park could provide such facilities given its proximity to the South Downs Way, just half a mile away. Sandgate Park could also be a suitable location for additional active sports provisions such as football pitches."

Ecology

Potential Effects

7.56 The proposed development will result in no statutory or non-statutory sites being significantly impacted upon. T No significant residual ecological impacts are predicted from the time extension of sand extraction or from the importation and processing of inert waste materials for use in the restoration of Washington Sandpit.

7.57 The restoration of the site to a country park will have a positive major residual impact on a site of 'Local' importance through the creation and enhancement of a range of habitats as part its restoration to a country park with benefits for wildlife.

7.58 There are no legal or policy implications for ecology and nature conservation from the proposed scheme.

7.59 The continuation of recovery operations will not require any further taking of land outside the already active permitted sandpit and as such is not likely to have significant ecological impacts on the existing baseline conditions within the application site, or on the wider surrounding area, over and above the impacts already experienced spatially from the existing operations carried out at this site. Although temporally the time extension will continue any such impacts for an additional 5-year period this is not likely to have a significant

impact on any designated sites habitats and/or species within the application site or in close proximity to Washington Sandpit.

7.60 The restoration of the site to a country park provides an opportunity to enhance this site for biodiversity through the creation of habitats and provision of features suitable for a wide range of individual and groups of species that would have benefits for biodiversity over the long-term at this site whilst providing a recreation facility for the local population.

Summary of Mitigation Measures

7.61 Due to the fact that the proposed scheme is for a time extension to existing extraction of sand and for the revised restoration of the site and providing all existing measures and controls relating to this site are maintained, no additional mitigation measures to those already in place at the site are proposed or deemed necessary.

7.62 Ecologists have and will continue to provide input to the landscape design for the restoration of the site, to ensure that opportunities are taken to maximise the ecological value of the site through its restoration for use as a country park. .

8.0 BENEFITS OF THE DEVELOPMENT

8.1 The proposed revised restoration has the potential to make an important contribution to waste management in West Sussex and ensure the longevity of the Sandgate Country Park is secured.

8.2 The facility would provide a number of benefits including:

- avoid the sterilisation of permitted mineral reserves;
- help West Sussex to demonstrate that they are seeking to comply with national policy on maintaining landbanks;
- help West Sussex to demonstrate that suitable projects which utilise inert waste for beneficial purposes are continuing to come forward, thereby avoiding the need for inert waste landfills; and
- deliver a high quality restoration scheme in accordance with the policy aims of the Sandgate Country Park.

8.3 It has therefore been demonstrated that the proposed development would make a significant beneficial contribution to the deliverability of the Sandgate Country Park.