

NON TECHNICAL SUMMARY

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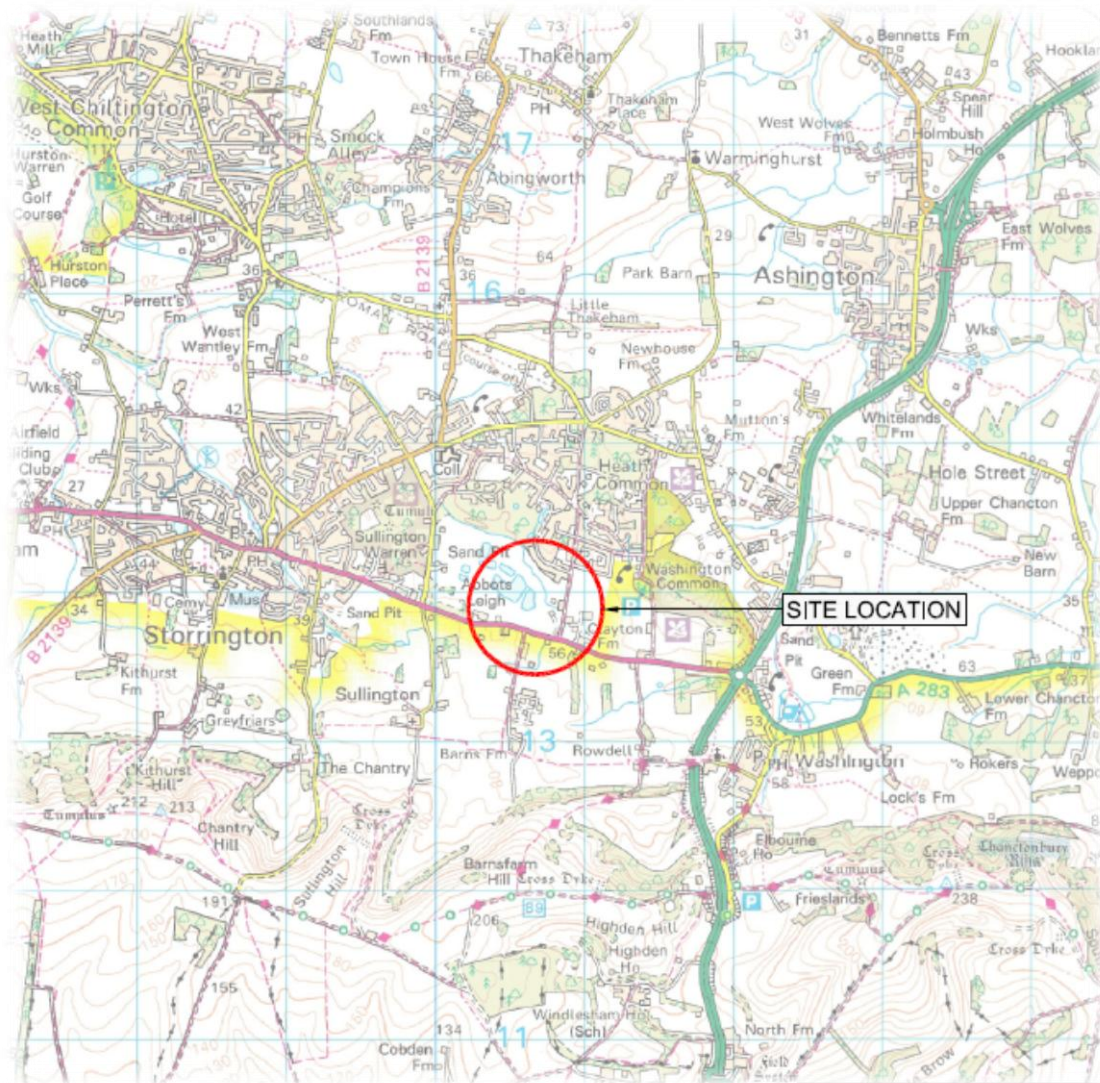
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1.0 INTRODUCTION

Overview

- 1.1 This document comprises a Non Technical Summary (NTS) of an Environmental Statement and has been prepared by SLR Consulting Limited (SLR) on behalf of Britaniacrest Recycling Ltd (the applicant). This NTS is part of a package of documents being submitted to West Sussex County Council (WSSCC) in support of a planning application for a revised restoration scheme 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 The proposed 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”

1.4 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 ($260,000 \times 1.80 = 468,000$): the material density factor has been provided by the applicant and is based on their extensive knowledge and experience.

Planning Application Submission Package

1.5 Thus NTS comprises Volume 3 of a larger multi volume submission to accompany the planning application. In addition to the formal planning application forms and certificates and drawings the full submission comprises:

- Volume 1: Planning Supporting Statement;
- Volume 2A: Environmental Statement (ES)
- Volume 2B: ES Technical Appendices
- Volume 3: A Non Technical Summary of the ES.

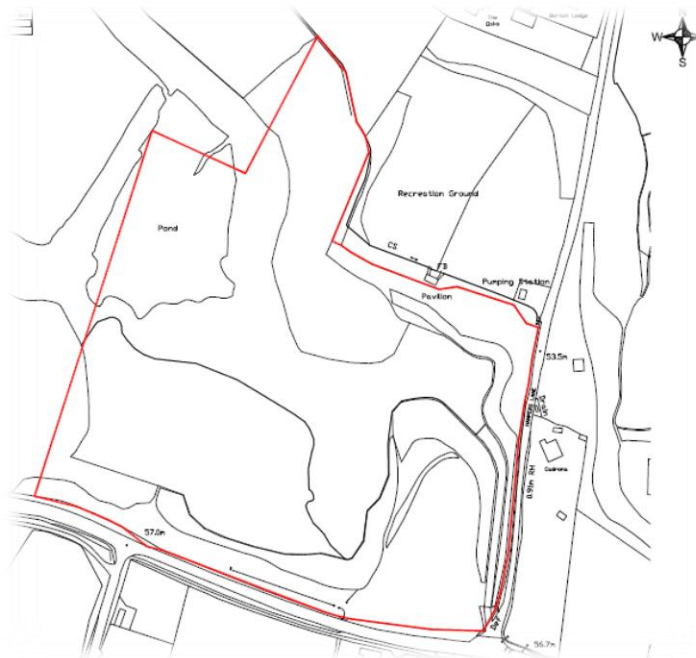
1.6 The NTS is a formal part of the ES. It provides, in non technical language, a brief summary of the likely significant effects that the proposed development would have on the environment.

2.0 THE SITE

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 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.

Access

- 2.6 Access to the Site is achieved via Hampers Lane.

THE PROPOSED DEVELOPMENT 3

3.0 THE PROPOSED 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.
- 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 equates to approximately 468,000 tonnes of clean inert waste/soil available for importation.
- 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 a beneficial after use to be handed back to the Sandgate Country Park for public use.
- 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).

Phased Restoration

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

THE PROPOSED DEVELOPMENT 3

Proposed Restoration Scheme

- 3.9 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.
- 3.10 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.
- 3.11 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.

Hours of Operation

- 3.12 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.
- 3.13 No operations shall occur on Bank and School Holidays, or on Sundays.

Temporary Site Infrastructure

- 3.14 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

- 3.15 Up to five full time jobs would be created at the Site.
- 3.16 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 POLICY BACKGROUND

- 4.1 The Policy Documents which have been considered as part of this proposal are:
- National Planning Policy Framework (NPPF) 2012;
 - Planning Policy Statement 10 “Planning for Sustainable Waste Management” 2011;
 - The West Sussex Minerals Local Plan 2003;
 - The West Sussex Waste Local Plan, submission version, March 2013; and
 - Horsham District Planning Framework (preferred strategy stage 2013)
 - South Downs National Park Partnership Management Plan

National Policy

National Planning Policy Framework

- 4.2 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.
- 4.3 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.
- 4.4 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
- 4.5 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.
- 4.6 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

- 4.7 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 the objectives set out within paragraph 3 of PPS10.
- 4.8 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

- 4.9 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.”

- 4.10 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.”

- 4.11 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.

- 4.12 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.”

POLICY BACKGROUND 4

- 4.13 Washington Sandpit is part of the Sandgate Park area and thus the above policy is considered to be particularly relevant.
- 4.14 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.
- 4.15 Policy 34 also allows for small extensions where sterilisation of mineral resources would be avoided and an environmental benefit would occur.
- 4.16 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.
- 4.17 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

- 4.18 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.
- 4.19 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

- 4.20 This document identifies a site specific allocation of land covering Washington Sand Pit.
- 4.21 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”.
- 4.22 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

POLICY BACKGROUND 4

the east. This includes the existing CEMEX sand pit as well as the Washington Sand Pit site.

4.23 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”.

4.24 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.”

4.25 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.

4.26 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.

4.27 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

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

POLICY BACKGROUND 4

“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.”

4.29 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.

4.30 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.”

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

5.0 ALTERNATIVES

No Development Alternative

- 5.1 The 'No Development' option in this case has two scenarios in that the current planning permission requires that mineral working ceases and the site is restored by the end of 2013 and there is currently a planning application under consideration for extending the period of mineral working until the end of 2015. With regard to the development proposals being considered in this ES (mineral working and inert infill) this date would extend to the end of 2018. The 'No Development' option therefore has two potential end dates for mineral extraction and restoration of the end of 2013 or the end of 2015, rather than the now proposed date of the end of 2018
- 5.2 The implications of the 'No Development' option are summarised below:
- mineral that could otherwise be extracted could be sterilised and the County would continue to be unable to demonstrate a seven year landbank for aggregates;
 - the opportunity to meet the identified need for inert waste recovery capacity for the restoration of mineral workings in the County would be lost;
 - the opportunity would be lost to provide an improved restoration scheme for the site; and
 - the identified job opportunities as a result of the proposed development would not be created.
- 5.3 The assessments undertaken for this ES demonstrate that subject to mitigation no significant effects on the environment are likely as a result of the proposed development. In addition longer term benefits to the landscape and ecology as a result of the revised restoration landform have been identified. No environmental reasons have therefore been identified as to why the proposed development should not proceed and the potential mineral sterilisation and loss of inert voidspace implications of the 'No Development' option are not preferred.

Alternative Sites

- 5.4 No alternative sites have been considered as part of the preparation of the ES for the following reasons:
- The proposed development is seeking to avoid the sterilisation of mineral reserves at this site; and
 - The proposed development is seeking to improve and enhance the approved restoration scheme at this site.
- 5.5 The proposed development is therefore seeking to deliver matters that can only be achieved at this site and therefore the consideration of alternative sites is not necessary.

POTENTIAL ENVIRONMENTAL EFFECTS 6

6.0 POTENTIAL ENVIRONMENTAL EFFECTS

Introduction

- 6.1 This section sets out a summary of the potential environmental effects and a summary of the main mitigation measures for the proposed development.
- 6.2 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.
- 6.3 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

- 6.4 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.
- 6.5 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.
- 6.6 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.

POTENTIAL ENVIRONMENTAL EFFECTS 6

- 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

- 6.7 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

- 6.8 An assessment of the air quality impacts associated with the proposed development has been undertaken.
- 6.9 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.
- 6.10 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'.
- 6.11 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 through the village of Storrington and the Storrington AQMA.

POTENTIAL ENVIRONMENTAL EFFECTS 6

- 6.12 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.
- 6.13 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.
- 6.14 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.
- 6.15 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.
- 6.16 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.
- 6.17 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

- 6.18 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.
- 6.19 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.

POTENTIAL ENVIRONMENTAL EFFECTS 6

- 6.20 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.
- 6.21 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.
- 6.22 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.
- 6.23 As described in 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.

POTENTIAL ENVIRONMENTAL EFFECTS 6

Noise

Potential Effects

- 6.24 The assessment has considered the potential operational proposals to give rise to noise impacts at the closest noise-sensitive receptors.
- 6.25 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

- 6.26 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).
- 6.27 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.
- 6.28 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

POTENTIAL ENVIRONMENTAL EFFECTS 6

Water Environment

Potential Effects

- 6.29 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.
- 6.30 All aspects of the operation of the Site would be in accordance with best practice guidance.
- 6.31 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.
- 6.32 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

- 6.33 Various best practice techniques would be incorporated within the management procedures for construction and operation activities on site in order to protect the water environment from pollution incidents.
- 6.34 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.
- 6.35 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

POTENTIAL ENVIRONMENTAL EFFECTS 6

- 6.36 The above measures would significantly reduce the likelihood of pollutants being discharged from the Site, such that the overall risk is reduced to 'low'.
- 6.37 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.
- 6.38 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

- 6.39 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.
- 6.40 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.
- 6.41 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 be the responsibility of CEMEX UK through an existing by-law.
- 6.42 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.
- 6.43 The FRA (Technical Appendix 9/Volume 2B) provides details of the proposed surface water management.

Landscape

Potential Effects

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

POTENTIAL ENVIRONMENTAL EFFECTS 6

- 6.45 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

- 6.46 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.
- 6.47 Perceived landscape effects outside the site are also limited due to the enclosed nature of the site and screening provided by the peripheral vegetation.
- 6.48 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.
- 6.49 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.
- 6.50 No significant landscape effects have been identified.

Visual Effects

- 6.51 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.
- 6.52 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).
- 6.53 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

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site but neutral to beneficial following the long term establishment of the proposed restoration scheme.

- 6.54 Visual effects on users of the South Downs National Park to the south would be negligible if perceivable.
- 6.55 No significant visual effects have been identified.

Summary of Mitigation Measures

- 6.56 A Landscape Restoration Management Plan (LRMP) has been provided please see Technical Appendix 10 Volume 2B.
- 6.57 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

- 6.58 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.
- 6.59 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.
- 6.60 There are no legal or policy implications for ecology and nature conservation from the proposed scheme.

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- 6.61 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.
- 6.62 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

- 6.63 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.
- 6.64 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.

BENEFITS OF THE DEVELOPMENT 7

7.0 BENEFITS OF THE DEVELOPMENT

7.1 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.

7.2 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.

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