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INTRODUCTION

- 1.1 This document comprises an Environmental Statement (ES) which has been prepared by SLR Consulting Ltd (SLR) on behalf of Britaniacrest Recycling Ltd (the applicant). The ES is part of a package of documents being submitted to West Sussex County Council (WSSCC) in support of a planning application for the continuation of mineral extraction and a revised restoration scheme at the 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 1-0 Site Location



- 1.3 The ES aims to provide an objective account of the possible significant environmental effects of the proposed development by setting out the results of the Environmental Impact Assessment (EIA) that has been undertaken.
- 1.4 The ES has been prepared in line with the framework provided by the Town and County Planning (Environmental Impact Assessment) Regulations 2011 (the EIA Regulations) and the Institute of Environmental Management and Assessment 'Guidelines for Environmental Impact Assessment'.
- 1.5 The EIA Regulations specify the types of development for which an EIA is mandatory (Schedule 1 projects) and categories of development where an EIA may be required (Schedule 2 projects).
- 1.6 In connection with the recovery operation of restoration of mineral working at the application Site, it is considered to be a Schedule 2, Regulation 2 (1) development which could have significant effects.
- 1.7 At the pre-application meeting with WSCC, the Waste Authority agreed that an EIA would likely be required (for Pre-Application advice please refer to Volume 2B Technical Appendix 2) and that the applicant should consider submitting an ES.
- 1.8 A Section 73 application is currently pending with WSCC (Ap Ref WSCC/086/13/SR) for a proposal to extend the extraction operations at Washington Pit by 2 years. This would extend the extraction of sand and associated activities until 31st December 2015.
- 1.9 In order to provide a comprehensive submission the development proposed and assessed in this ES therefore includes both the five year restoration works using imported inert materials and for mineral extraction operations to continue during the first 2 years of the restoration works.

THE APPLICATION SUBMISSION PACKAGE

- 1.10 This ES comprises Volume 2A of a larger multi volume submission to accompany the planning application. In addition to the formal planning application forms and certificates, the full submission comprises:
 - Volume 1 Planning Supporting Statement (including appendices i.e. application forms and drawings);
 - Volume 2A Environmental Statement;
 - Volume 2B Technical Appendices to the Environmental Statement; and
 - Volume 3 Non Technical Summary.
- 1.11 The Planning Statement supports the planning application and considers the proposal in the context of relevant planning policies and strategies, other material considerations including need and climate change.
- 1.12 The Design and Access Statement is a statutorily required document to accompany a planning application and has been prepared to describe the design and the access arrangements.

- 1.13 The Non Technical Summary (NTS) has been produced as a separate document to accompany the planning submission, being a mandatory part of the ES. This provides, in non-technical language, a brief summary of the likely significant effects that the revised restoration would have on the environment.

ENVIRONMENTAL IMPACT ASSESSMENT

- 1.14 Environmental Impact Assessment is an important procedure for ensuring that the likely effects of a new development on the environment are fully understood and taken into account before the development is allowed to proceed. The term EIA describes a procedure that must be followed for certain types of development before they are given “development consent”, which in the UK includes the grant of a planning permission.
- 1.15 The procedure is a means of drawing together, in a systematic way, an assessment of a project’s likely significant environmental effects.

Statutory Background

European Context

- 1.16 The Environmental Impact Assessment Directive¹ (the “EIA Directive”) requires that, before granting ‘development consent’ for projects, including development proposals, authorities should carry out a procedure known as environmental impact assessment (or “EIA”) of any project which is likely to have significant effects on the environment. The aim of the EIA Directive is to ensure that the authority giving consent for a project makes its decision in the knowledge of any likely significant effects on the environment.
- 1.17 The first EIA Directive (85/337/EEC) came into force in 1988. An amending Directive (97/11/EC) came into force on 14 March 1999. This extended the range of development to which the Directive applies and made some small changes to EIA procedures. The Directive was further amended by Article 3 of Directive 2003/35/EC which strengthened the requirements within the EIA procedures for public consultation and participation.

National Context

- 1.18 The EIA Directive has been implemented by regulations for development proposals under the Town and Country Planning Act 1990 (the 1990 Act).
- 1.19 Since 14 March 1999, EIA has been applied to relevant proposals for new development, including relevant proposals for new waste management

¹ Council Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment, as amended by Council Directive 97/11/EC and Article 3 of Council Directive 2003/35/EC. Consolidated version at:
<http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1985L0337:20030625:EN:PDF>

facilities, by the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999. During the intervening period, the 1999 EIA Regulations were amended by a number of Statutory Instruments. In August 2011, the 1999 regulations were replaced by the Town and Country Planning (Environmental Impact Assessment) Regulations 2011² (the EIA Regulations previously referred to above).

The Environmental Statement

1.20 An ES is a report of an EIA that is required to be submitted with a planning application for major and other developments that are likely to have significant impacts on the environment. It evaluates the likely environmental impacts of the development, together with an assessment of how the severity of the impacts could be reduced.

1.21 The EIA Regulations define an ES as a statement:

“that includes such of the information referred to in Part I of Schedule 4 as is reasonably required to assess the environmental effects of the development and which the applicant can, having regard in particular to current knowledge and methods of assessment, reasonably be required to compile, but that includes at least the information referred to in Part II of Schedule 4”.

Content

1.22 There is no prescribed form for an ES, provided the requirements of the EIA Regulations are met.

1.23 Regulation 2(1) and the associated Schedule 4 of the EIA Regulations sets out the requirements regarding the content of an ES. For ease of reference, the box below sets out the requirements. Referring to paragraph 1.18 above, an ES must contain the information in Part II.

Figure 1-1 Regulation 2(1) and the associated Schedule 4 of the EIA Regulations Requirements

PART I

1. Description of the development, including in particular

- a) a description of the physical characteristics of the whole development and the land-use requirements during the construction and operational phases;
- (b) a description of the main characteristics of the production processes, for instance, nature and quantity of materials used;

² SI 2011 No. 1824

(c) an estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat radiation, etc.) resulting from the operation of the proposed development.

2. An outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for his choice, taking into account the environmental effects.

3. A description of the aspects of the environment likely to be significantly affected by the proposed development, including, in particular, population, fauna, flora, soil water, air, climatic factors, material assets, including the architectural and archaeological heritage, landscape and the inter-relationship between the above factors.

4. A description of the likely significant affects of the development on the environment, which should cover the direct effects and any indirect, secondary, cumulative, short, medium and long-tem, permanent and temporary, positive and negative effects of the development, resulting from:

(a) the existence of the development;

(b) the use of natural resources;

(c) the emission of pollutants, the creation of nuisances and the elimination of waste, and the description of the measures by the applicant of the forecasting methods used to assess the effects on the environment.

5. A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment.

6. A non-technical summary of the information provided under paragraphs 1 to 5 of this Part.

7. An indication of any difficulties (technical deficiencies or lack of know-how) encountered by the applicant in compiling the required information.

PART II

1. A description of the development comprising information on the site, design and size of the development.

2. A description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects.

3. The data required to identify and assess the main effects which the development is likely to have on the environment.

4. An outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for his choice, taking into account the environmental effects.

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| 5. A non-technical summary of the information provided under paragraphs 1 to 4 of this Part. |
|--|

1.24 Appendices 1 to 10 of the former Department of the Environment, Transport and the Regions “Good Practice Guide for the Preparation of Environmental Statements for Planning Projects”³ structure the legal requirements of the Regulations as follows:

- human beings (population changes, changes in the consumption of housing or services);
- noise and vibration;
- traffic and transport;
- land use;
- flora and fauna (ecology);
- soil, geology and hydrogeology;
- water (hydrology);
- air and climate;
- landscape; and
- cultural heritage/material assets

1.25 Although this guidance relates to the superseded 1988 EIA Regulations, it is still considered to be a valid source of basic good practice advice within the context of the UK Town and Country Planning system. More recent guidance is provided in the Government Circular 02/99 “Environmental Impact Assessment”, which accompanies the EIA Regulations.

Pre-Application Advice

1.26 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.

Approach to Assessment

1.27 The EIA has identified a range of potential environmental issues, many of which vary both in terms of when they occur within the life cycle of the development, and the length of time they are significant. The proposed recovery operation for the revised restoration of the mineral working would last for five years (start date early 2014) with a short period of aftercare afterwards.

1.28 Identified impacts can have differing durations and the EIA has classified impacts into three timeframes;

- Short Term – from a few months to five years;
- Medium Term – five to fifteen years;

- Long Term – in excess of fifteen years
- 1.29 In addition, effects can be temporary or permanent, direct or indirect, or positive or negative. As required by the EIA Regulations, the assessment of impacts has been carried out according to its type (positive or negative) and duration (temporary or permanent). Residual and cumulative impacts have also been considered. These are described in the relevant ES chapters and summarised in the Cumulative Impact chapter (please refer to Vol 2A Chapter 12).
- 1.30 For each environmental aspect, the detailed assessment methodology is discussed in the relevant ES Chapter.
- 1.31 The criteria used for assessing the degree of significance are based on the relevant technical guidance from the appropriate professional institute and/or industry good practice. Where well-documented significance criteria are not available, generic significance criteria (Table 1/1) have been used based on the requirements of the EIA Regulations. They have been developed following research and based on SLR’s expertise and experience in carrying out EIA’s.

Table 1-1 Generic Significance Criteria

Significance	Criteria
Severe – for adverse effects only	Severe or major* effects represent key factors in the decision-making process.
Major * - for beneficial effects only	They will principally occur where very important resources are subject to extreme effects. Such effects are generally, but not exclusively, associated with any recognised or designated sites/features of international or national importance. Mitigation measures are unlikely to remove or modify the adverse effects. Major* beneficial effects may occur if there is a substantial increase in the value of the environmental resource qualitatively or quantitatively on an international or national level.
Major	Major effects are important considerations on a regional or county level, principally affecting very important resources or creating extreme effects on important resources. Mitigation measures and detailed design work are unlikely to remove all the adverse effects by virtue of the magnitude of the predicted effects. Major beneficial effects may occur if there is a substantial increase in the value of the environmental resource qualitatively or quantitatively on a regional or county level.
Moderate	Moderate effects are important considerations at a district level, but are unlikely to be key decision making issues. They will principally

<p>Minor</p>	<p>occur where important resources are moderately or slightly affected or where lesser resources are affected in the extreme.</p> <p>Mitigation measures and detailed design work may ameliorate some of the consequences on the affected communities or interests; however some residual effects may occur if there is a considerable increase in the value of the resource on a district level.</p> <p>Minor effects are experienced at the local level and do not represent important issues in the decision making process. Assignment of this level of significance will principally occur if less important environmental resources experience more limited effects.</p> <p>Appropriate mitigation measures may reduce, remove or even reverse such effects.</p> <p>Minor beneficial effects may occur if there is only a limited increase in the value of the resource at a local level.</p>
<p>Negligible</p>	<p>Effects are assigned to this level if they are nil, imperceptible, negligible, within normal bounds of variation, or within margins of forecasting error when compared to the existing situation.</p>

- 1.32 In order to determine the degree of any effect, a series of baseline surveys have also been undertaken for the purpose of the EIA. These are referred to in greater detail within the relevant ES Chapters.

STRUCTURE OF THE SUBMISSION

- 1.33 This chapter of this ES provides an overview of the submission and the regulatory framework regarding EIA.
- 1.34 Subsequent chapters of the ES provide a description of the Site; set out its planning history; describe the development proposals and set out the alternatives considered; and then provide an analysis and evaluation of the effects of the development on the human and natural environments on a topic by topic basis.
- 1.35 Where potential environmental impacts are identified, mitigation strategies are put forward and residual impacts are assessed.
- 1.36 As such the ES is intended to provide WSCC with sufficient information to determine the planning application having due regard to the protection of the local amenity and the environment as a whole.

- 1.37 This document (Volume 2A) is presented as follows:
- Chapter 1 Introduction;
 - Chapter 2 Site Description and Surrounding Area;
 - Chapter 3 Description of Development;
 - Chapter 4 Planning Policy
 - Chapter 5 Alternatives;
 - Chapter 6 Traffic;
 - 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
- 1.38 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.

PROJECT TEAM

- 1.39 This ES 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 issues³. 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.
- 1.40 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, hydrogeologists and environmental scientists for the majority of the technical assessments.

³ Further details regarding SLR Consulting Limited can be found on its web site www.slrconsulting.com

- 1.41 SLR has also worked closely with the management teams and other consultants used by the applicant in a detailed and iterative process, to ensure that the working scheme is feasible as well as optimising environmental protection.