

fluid planning

**Former Standen Landfill
Evergreen Farm
RH19 4NE**

**Planning & Transport Statement
0043**

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1. Introduction

- 1.1 Planning permission GR/350/80 allowed for the tipping of dry builder's material to the Standen Landfill. Waste deposits comprised skip and construction waste delivered by HGV. Today, the site is rough pasture, with an adjoining equestrian and residential use.
- 1.2 The former landfill operation has the potential for a high risk to human health from landfill gas and groundwater leachate emissions to controlled waters. The owners experienced the loss and maiming of horses and livestock from exposed obstructions comprising rebar, plastic bags and concrete. The site has also suffered differential settlement leaving the surface uneven and unsuitable for equestrian activities.
- 1.3 Geo Environmental Ltd conducted ground investigations to establish the risks posed by the deposit of waste beneath the site. Their survey work identified elevated concentrations of benzo(a)pyrene and concentrated and high levels of methane. Their assessment identified risks to controlled waters through the leaching of groundwater contaminants. The concentration of emissions requires remediation measures to preserve human health.
- 1.4 A restoration layer designed to modern standard can control the risk to human health identified. The restoration layer requires a 1.0-1.1metre impermeable clay cover system topped with a restoration layer. This cap would mitigate the risk associated with the physical quality of soil encountered near the surface (brick, tarmacadam, metal, glass). The installation of a capping system on site will increase overland rather than direct infiltration and flow through the waste mass protecting controlled waters by limiting the potential leaching of the elevated contaminants of concern identified beneath the site. The control of gas emissions requires a gas venting layer within the cap.
- 1.5 The Environmental Protection Group Ltd (EPG) reviewed the Ground Investigation Report. EPG specialises in geotechnical landfill cap design and land stability. The proposed remediation involves a capping layer over the waste to prevent contact with contaminants and reduce infiltration of rainfall through the waste material. The capping system includes a gas venting and surface water drainage system to prevent gas build up below the new cap and minimise the identified risks. The impermeable

clay capping layer requires a 1metre thick layer of clay with a minimum permeability of $1 \times 10^{-8} \text{m/s}$. Above this, EPG recommend a protection layer to prevent desiccation of the impermeable clay cap, and the burrowing into it by animals. The after use will be pasture, the restoration layer over top of the clay cap will be 1 metre thick. Where the after use is woodland, a 2 metre thick protection layer is required. The transition between these two thickness of restoration layer and the merging of the cap with existing contours requires sculpting and careful management that in some areas results in slightly more depth. Any leachate from the landfill will channel to the outfall via a small swale and wetland system to be installed as a secondary precaution. Planting details of the swale are provided on the landscape drawing reference WD806LO1.

- 1.6 This application requests permission for “Restoration of the former Standen Landfill site with a woodland and pasture landfill cap system”. The topography of the land and the size of the land-holding at around seven hectares precludes a viable agricultural use. The application site extends to 4.4 hectares including the access roads. Around half the cap area, located on the shallower slopes of the landfill will be part planted with a native broadleaf woodland to extend the wooded area and mitigate the Ancient Woodland to the northeast of the site. A degree of natural regeneration of woodland around the planted areas will be allowed to establish. The steeper sections of the landfill will be grass native to the High Weald Area of Outstanding Natural Beauty. Only 1 metre depth of restoration layer can be added to the steeper sections due to stability considerations. The existing stables will be unaffected; however, a requirement is the removal of the sand school.
- 1.7 It is estimated that around 120,000-150,000 cubic metres of soil are required to construct the proposed landfill cap. This allows sufficient material for the clay cap, restoration layer and a new topsoil level. Compaction densities are not an exact science, and the level of imported soil required is a guide only. More or less soil might be necessary. All soil will be inert recovered material sourced locally from construction sites and imported under a bespoke Environment Agency Recovery Permit. The approved land levels will control the maximum level of imported soil. HGV deliveries to site are required. Each HGV can accommodate ten cubic metres of soil on average. This equates to around 12,000 - 15,000 HGV deliveries. On-site personnel will number three to operate 1-2 x bulldozers and 1 x360 digger (Bulldozer Komatsu D61 px * 360 digger Komatsu pc210 lc). A portacabin will house temporary welfare facilities.
- 1.8 Construction of the cap will take place in two halves. To control noise impact from

machinery, part of the site will only operate over 8-weeks per annum. The acoustic report explains the approach to controlling noise impact on sensitive receptors and limiting working weeks to 8 only along the western boundary protects nearby receptors. Drawing fp0043.11 shows this area of land hatched in green. The remainder of the cap, will be built year round. Construction times are dependent on the availability of suitable material and to ensure the area limited to 8-weeks of work per annum, is built effectively, material will be stockpiled on site in advance to allow the steeper section of the cap to be built during the 8-weeks construction period. Stockpiled material will be kept in bunds 3metres tall along the boundary of the 8-week zone ready for placement. It is estimated that importation of the required soils can be achieved in approximately 80-weeks. Full restoration is expected to take in the region of two to two and a half years. The existing topsoil is thin and contaminated with debris. It will remain in situ. HGVs will drive across the land and tip imported material as close to the placement area as possible. One bulldozer and one 360 will operate to spread the material. The 360 is normally stationary, and moves the material from the point of deposit and turns 180 degrees to place it behind itself ready for the bulldozer to spread. HGVs will tip into a pit to contain the material and this is normal practice. It also allows them to tip off haul roads that will be constructed when required and this will ensure mud is not tracked back onto the haul road. Manual labour using smaller trenching machines will construct the pipe work system. Once the impermeable layer of the cap is constructed, it will be topsoiled.

1.9 The site will operate 07.00 to 17.00 Monday to Friday and occasionally Saturdays 08.00 to 13.00. There will be no working on Bank Holidays or Sunday. Plant will move around the site according to weather and types of material imported. Wheel wash facilities will be located at the southern egress from the site. At this point, HGV would have travelled along a haul road loosening any tracked mud. A road sweeper will be situated on site and deployed as required. As the local planning authority will appreciate, seeking planning permission is the first stage in progressing the scheme. An Environment Agency permit will be sought and a detailed construction plan will be developed later as part of that process. These two documents can be conditioned for discharge before the commencement of the scheme.

1.10 HGV movements are expected at a rate of 35 deliveries per day. The following routing is proposed:

Route to Evergreen Farm:

- A22 London Road to East Grinstead Town Centre.
- A22 London Road onto Ship Street travelling south to roundabout with Dunnings Road.

- Travelling south along Dunnings Road which becomes West Hoathly Road.
- Turning left into Evergreen Farm (Access is on the western boundary).

The preferred exit route back to the A22 is: I

- Exit left out of the southern end of Evergreen Farm onto short run of shared driveway (This is shared with Standen House).
- Turn left onto West Hoathly Road travelling to junction with Saint Hill Road.
- Travel North along Saint Hill Road to cross road with B2110 and Imberhorne Lane.
- North along Imberhorne Lane to London Road.

1.11 A road safety audit was conducted on this routing with recommendations made in respect of vehicle tracking and signage. The vehicle tracking plan fp0043.10 has been updated that prove the access and egress are safe and take HGVs south in stead of north. Signage will be erected along the routing and at accesses to ensure other road users are aware of the works taking place. The applicant is agreeable to controlling vehicle deliveries to outside of peak hours (9.30 - 15.30) if necessary and will commit to a S59 agreement to ensure the highway is maintained and damage repaired along the routing. Users of Standen House will be warned via signage that HGVs may be turning near to the entrance. Stop signs will be placed at the gates to the application site to ensure that HGVs stop and look before manoeuvring onto the drive and West Hoathly Road. Contact details of the site manager will be placed on signage to report any antisocial behaviour. All drivers will be provided with briefing before visiting the site. The operations will be carried out by one contractor and HGVs will have private number plates that allow tracking of drivers if situations arise. Ultimately, vehicle speeds at the egress will be slow and the risk low.

1.12 Bridlepath 28bEG runs to the south of the egress, joining with East Hoathly Road. Signage will be erected at the junction with West Hoathly Road to warn users of the PROW that HGVs will be on the network.

1.13 Dust from the operations will be managed in accordance with the submitted dust assessment completed by Anderson Acoustics. The conclusion of the assessment is that human health effects of the proposed capping works are considered Not Significant.

1.14 Restoration of the capping system will be completed in accordance with submitted landscape drawing. To control the visual impact of the works viewed from the west, the contractor will work to retain a screen of existing trees along the western boundary where possible. Their phased removal could provide some mitigatory effects. However, the end result with respect to trees is shown in Appendix B to the Arborist report where the extent of retained trees is shown. Trees along the

western boundary are generally of low value or are immature. Their RPA's will be compromised by the cap and the cap cannot be fully built without their removal. At the western boundary the restoration layer would not provide sufficient depth to protect the clay cap. Mitigatory tree planting is proposed elsewhere on site where soil depths within the restoration layer allow.

1.15 This application follows pre-application advice dated January 26th 2016 which considered the reprofiling of the site. The guidance confirms that major developments are generally not supported in the AONB unless exceptional circumstances and or overriding public benefits result. This statement summarises the pollution risks posed by the current condition of the landfill, before proceeding to show conformity with planning policy. In addition to a full set of plans, the following technical reports support this application:

- Desk Top Study Evergreen Farm (Ged Duckworth Ltd),
- Ground Investigation Report (Geo Environmental Ltd),
- Geotechnical Design Report for Landfill Cap (The Environmental Protection Group Ltd),
- Arboricultural Assessment (The Mayhew Consultancy Ltd),
- Landscape Visual Impact Assessment (Weller Design Ltd),
- Ecological Assessments (Ecology Co-op Ltd),
- Drainage (Civil Engineering Solutions Ltd),
- Acoustic Assessment (Anderson Acoustics),
- Dust Impact Assessment (Anderson Acoustics), and,
- Road Safety Audit.

1.16 The site, upon completion of the remediation works will be returned to grazing land for horses and livestock. No commercial uses are proposed. Areas planted with woodland and allowed to regenerate naturally will be left in that use. Although camping on land adjoining the site has taken place, it is not proposed that the land be used for camping through this application. The resultant land area would not support commercial agriculture or equestrian uses due to the gradient and size. It is expected the land be used privately for those purposes.

2. Planning considerations

2.1 The development plan comprises the National planning policy framework (Framework), National planning policy for waste and the West Sussex Waste Local

Plan (WSWLP). The assessment of the proposal focusses on the policies of the West Sussex Waste Local Plan unless they deviate from national level policies.

Principle of development within the Area of Outstanding Natural Beauty

2.2 Paragraph 7, bullet point 6 of the National planning policy for waste requires waste planning authorities to ensure landfill sites are restored to beneficial uses at the earliest opportunity and to high environmental standards. However, paragraph 172 of the Framework places great weight on conserving and enhancing AONBs. AONBs have the highest status of protection. The acceptability of the proposal requires the balancing of environment and human health protection with the AONB designation.

2.3 WSWLP policy W1, part f) relates to landfilling operations and the need to demonstrate other recovery operations cannot accept the waste. The engineering works proposed are a recovery operation. WSWLP Policy W8 dictates the approach to dealing with proposals for the use of inert waste. The requirements are that:

(a) the proposal result in clear benefits for the site and, where possible, the wider area,

(b) the material to be used is only residual waste following recycling and/or recovery or it is a waste that cannot be recycled or treated;

(c) there is a genuine need to use the waste material as a substitute for a non-waste material that would otherwise have to be used;

(d) the material to be reused is suitable for its intended use;

(e) the amount of waste material to be used is no more than is necessary to deliver the benefits identified under (a);

(f) there would be no unacceptable impact on natural resources and other environmental constraints;

(g) the proposal accords with Policy W13 (Protected Landscapes);

(h) any important mineral reserves would not be sterilised; and,

(i) restoration of the site to a high-quality standard would take place in accordance

with Policy W20.

- 2.4 The submitted technical reports explain the need for this recovery operation on the grounds of environmental and public health protection. The findings of the report show that the 1 metre of clay cap, compacted to be impermeable to prevent infiltration is necessary. The proposed restoration layer of between 1 and 2 metres depth is the minimum required to put the land back to productive use. Occasionally, in some areas, to grade the site naturally, additional restoration depth is required but the depths would not exceed 3.5metres. But this nominal additional depth is more than offset by the restoration layer tapering down to existing levels at the boundary to the site therefore reducing the theoretical amounts of material required. The LVIA supports the proposed capping system and the mirroring where possible of the existing contours. The submitted plans show the extent of the cap and the split between the two cap profiles. The labelling shows the intent to plant woodland and meadow grass. The supporting Ecological Appraisal at section 5 confirms the mitigation measures and enhancements. The intent to restore the site is clear. The full details of the landscaping scheme can be secured through a pre-commencement planning conditions.
- 2.5 Because the minimum soil is intended to achieve the environmental and engineering objectives, the proposal should be considered against policy W8 and not W9 that deals with the disposal of waste to land. The intention, upon securing planning permission is to apply for a recovery permit from the Environment Agency. That said, at the time of submission the applicant has requested the Environment Agency make a recovery versus deposit determination. From this, the applicant will progress an application for a bespoke permit. The site will be regulated by two agencies and therefore be certain of consistuting the minimum volume of material to acheive the stated engineering objectives. The recovery permit can be conditioned as part of the planning permission to provide comfort prior to works commencing that the approved scheme will be constructed as planned. A post construction topographic survey will prove the minimum volume of material is used to achieve the approved contours.
- 2.6 WSWLP policy 12 requires high-quality development that has regard to context, the traditions and character of West Sussex, the topography of the site and views. Policy W13, part c) states that proposals for major waste development within protected landscapes will not be permitted unless compliance with the three criteria lists i-iii. These are:

(i) there is an overriding need for the development within the designated area: and

(ii) the need cannot be met in some other way or met outside the designated area;
and

(iii) any adverse impacts on the environment, landscape and recreational opportunities can be satisfactorily mitigated.

- 2.7 Policy W16: requires there are no unacceptable impacts on the quality of air, soil and water resources. That air quality is protected. And that watercourses are protected and enhanced. Land stability must also be satisfactorily resolved. In this case, the previous landfill restoration falls short of the level of environmental protection required. The proposal intends to satisfy the requirements of policy W16 fully.
- 2.8 An incremental approach to the investigation of the emissions from the landfill took place. The Desk Top Study (Ged Duckworth Ltd) identified the risks resultant from the landfill activities. Geo Environmental Ltd, through invasive ground investigations, identified the levels of contamination and identified them as breaching usual standards. Capping the landfill to contain the risks posed was recommended. The Geotechnical Design Report then explains the necessary cap depth and composition. Land stability considerations lead the proposed contours of the site and cap design. The minimum quantum of recovered inert soil is recommended. A genuine need for the proposal is demonstrated, with the benefit being the containment and reduction in harmful gas and leachate emissions as well as a usable land surface. The benefits extend beyond the site itself. Leachate from the landfill travels off-site into the wider environment. Minimising leachate emissions into the protected waterway is an overriding priority and in the public interest.
- 2.9 The proposal, plus the intended restoration scheme provide a series of clear benefits in containing and treating the emissions and this approach satisfies part a) of policy W8. The proposed inert soils required rely on the recovery of soils from the waste stream, and this can be conditioned and regulated via the intended bespoke Environment Agency permit. This satisfies part b) of policy W8. Part c) requires there to be a genuine need to use the waste material as a substitute for non-waste and part d) requires the material to be suitable for its use and part e) requires the minimum quantum. Non-waste soil does not exist in the quantities required, and the proposal will use the minimum necessary waste soil to contain the magnitude of risk posed. Parts f) through i) of policy W8 focus on the protection of landscapes

and restoration. The proposed end land use is sensitive to the landscape and would provide significant ecological enhancements through the rewilding of the site away from equestrian and agriculture. Planning conditions can be used to request the detailed planting strategy before commencement under part i) of this policy and Policy W20. This will tie in with a detailed construction management plan for the site. The intention is to return the site to a high-quality woodland, extending the existing wood on site and making sure the land use matches the size of the holding and topography.

Ancient woodland, trees and landscape impact

- 2.10 Paragraph 175, part c) of the Framework requires the refusal of development resulting in the loss or deterioration of the irreplaceable habitats, including Ancient Woodland unless exceptional reasons exist and a suitable mitigation strategy. WSWLP policy W11 requires the consideration of character. Policy W14 requires preservation of biodiversity and geodiversity unless the benefits outweigh the impact. Mitigatory schemes to offset impact area required. This proposal impacts the 15 metre buffer zone to Ancient Woodland on the northeast boundary. Removal of trees along the northwest border, usually of low quality individually and collectively is required. Geo Environmental and the supporting arboricultural assessment reason that some of the trees are in poor health due to elevated Carbon Dioxide and Methane presence. Impact on trees has, were reasonable been minimised. However, the integrity of the capping system, the level of protection afforded to environmental and human health led the design. While the capping system extends into the 15 metre buffer zone to the Ancient Woodland, the felling of trees is not necessary, nor would the Ancient Woodland soils be covered. Rather, the old capping system already extends into the RPAs to the trees. This will be upgraded with the modern capping system, but at this point the soil depths are minimal. Some trees, over time, might decline due to the impact on the root system. But they may not. The buffer zone would, on the conclusion of the engineering works, become woodland. The impact is transitory and beneficial beyond the current pasture use. Any impact on the Ancient Woodland boundary would take time to be observable, by which time, the mitigatory planting would ensure there is no visual impact. The need to control emissions off-site in the form of leachate to controlled waters and the protection of human health dictates an effect is justifiable against paragraph 175, part c) of the Framework. The restoration scheme will comply with policies W11 and W14.

Transport impact throughout the engineering works

- 2.11 WSWLP policy W18 considers transport impacts from waste development proposals. Part b) requires adequate transport links that do not have an unacceptable impact on amenity, character or the environment. Part i) specifies that the Lorry Route Network is used with minimal use of local roads. Consideration extends to highway capacity, safety and the ability for manoeuvring, loading and wheel cleaning facilities to be accommodated safely. The amenity impact of vehicle movements is considered through policy W19 requirements which requires traffic not to have an unacceptable effect on public health.
- 2.12 Saints Hill Road and West Hoathly Road are the two roads nearest the site. West Hoathly Road runs past the entrance to Evergreen Farm. Vehicle counts took place to understand existing traffic flows and establish a safe rate of HGV movements to the site. Table One and two show the comparison of the total flow rates over a typical week to HGV and Articulated/Bus flow rates for Saints Hill Road and West Hoathly Road.

Table One: Saints Hill Road Traffic Flows

	HGV	Articulated / Buses	Total HGV, articulated and buses	Total flows of all traffic
Northbound	96	152	248	10,292
Southbound	124	146	270	10,334

Table Two: West Hoathly Road Traffic Flows

	HGV	Articulated / Buses	Total HGV, articulated and buses	Total flows of all traffic
Northbound	66	77	143	7,263
Southbound	31	46	77	6,827

- 2.13 The site would operate weekdays 07:00 - 17:00 and Saturday 08:00 - 13:00, although

the applicant is open to restricted hours for HGV deliveries to avoid peak hours. The site would shut Sundays and Bank Holidays. Calculating the exact number of HGVs is not a precise science due to difficulties calculating the accurate payload of each HGV and the compaction rates of placed material on site. Standard assumptions exist. Each 32 tonne HGV can carry around 16 tonnes per load which equate to 10 cubic metres on average. An estimated 12,000-15,000 HGV deliveries are estimated to achieve the proposed levels.

- 2.14 The existing public highway network serving the site has been carefully considered and is adequate. The highway network can safely accommodate the HGV movements required for the operation. The number of trips generated by the operation is estimated to be around 35 deliveries per day. In addition to the above daily HGV movements during the construction period, there is also likely to be about 6 trips generated by the three members of staff who will operate the plant and machinery on site.
- 2.15 HGVs are expected to access the site via the western entrance situated on West Hoathly Road. HGVs will need to travel southbound from East Grinstead to the site. The source of the soil is not known at this stage. Multiple sources of material are probable. Specifying the route of every HGV is not possible. HGV movements to East Grinstead will, in all probability, be dispersed sufficiently not to cause highway safety or capacity issues. HGV movements will then concentrate on West Hoathly Road for a short distance. HGVs will use the existing western access to Evergreen Farm. HGVs will travel along the concrete haul road left from the historic landfill operation. Imported soil will be deposited for placement by bulldozers. HGVs will then follow the haul road round to the southern entrance opposite Standen House. At this point, it is proposed to operate a one way strategy to send HGVs southbound onto West Hoathly Road and then Saints Hill Road. This approach will prevent an impact resultant from two-way HGV movements along West Hoathly Road. Routing issues can be discussed with the Highway Authority to agree to the exact route and delivery rate of material.
- 2.16 A Road Safety Audit was carried out on the access to the site. Recommendation 3.1.1 raises potential for HGVs turning right out of the site onto West Hoathly Road overrunning the opposite kerb. Drawing fp0043.10 Vehicle tracking has been updated and proves that the access and egress (both left turns) are safe if vehicles turn right and travel southward. Recommendation 3.5.1 of the Road Safety Audit

identifies the need for advisory signage. This matter is resolvable and can be secured by condition to ensure other users of the highway are aware of the works taking place. HGV flows will be limited and dispersed so far as practicable over the 80 week construction period. There are unlikely to be any significant highway or transport impacts as a result of the proposed development. Signage along the haul route and drivers briefed on the nature of the route can control highways safety. The proposal has the potential to comply with the requirements of policy W19.

Hydrology and flood risk

- 2.17 Evergreen Farm is in Flood Zone 1. The site drains to the west and northwest boundaries. Part a) of WSWLP policy W17 is applicable since the site is not in an area at risk of flooding, removing the requirements of part b). The capping system will reprofile the topography upward, but retain the overall characteristics of the land to appear natural. Although it should be acknowledged it is a humanmade landform. Part a) of policy W17 requires that proposals do not increase the risk of flooding on or off-site. Appropriate measures are necessary to manage surface water flows using SUDs where applicable.
- 2.18 The capping system designed requires a SUDs based system to manage leachate. Civil Engineering Solutions Ltd specialise in the modelling of surface and flood waters. Detailed surface and groundwater modelling work underpin the proposed landform to prove, that under the worst-case scenarios that the risks of flooding on and off-site are acceptable. A two metre wide and half a metre deep swale is proposed. This is shown on page 15 of the SUDs report and is indicated on the cross sectional plans. The proposal is compliant with the requirements of policy W1.

Amenity and compatibility with surrounding uses

- 2.19 Policy W19 controls the impact of proposals to avoid the unacceptable effects from light, noise, dust, odours and other emissions. The focus is on the protection of public health and amenity. The main priority will be the protection of amenity for residents of the neighbouring care home. The traffic flows anticipated have already been discussed earlier in this statement. Machinery on site will be limited in number and will be maintained in good working order to minimise noise. Areas of the site within 110metres of receptors will operate for only one 8-week block per annum, to be limited to the dry summer months. Materials to construct this section of the site will be stockpiled along the boundary of the 8-week zone in advance and placed quickly

to minimise impact. A 3m embankment will first be installed within the 8-week work zone along the western boundary and the cap constructed behind it. This approach provides a degree of acoustic and visual mitigation to nearby receptors. This area is also the steepest part of the site and requires dry conditions. Generally, separation distances mean noise should not be an issue. Odours should not occur. Artificial lighting is not proposed, and this will restrict operations to daylight hours. Dust control is generally achieved through the dowsing of dry material as required with sprinklers and the impact is proven to be Not significant by the accompanying Dust Impact Assessment. Any perceived impact should be weighed against the public benefits of capping the landfill to an acceptable standard to manage gas and leachate discharges to the environment.

The historic environment

- 2.20 Policy W15 allows for proposals affecting the historic environment to be permitted. Standen House, a Grade I Listed Arts and Crafts house is several hundred metres east of Evergreen Farm. The house and 12-acre garden are separated by fields and woodland that prevents any visual sight lines between the sites. The application area does not share a common boundary with the listed curtilage to Standen. The separation distance between the two sites is such that the operation will not affect the setting of the Listed Building. Evergreen Farm operated as a landfill during the 1990s, so is a recent operation that was deemed to have an acceptable relationship then. This application is for the proper management of the historic environmental liability through the restoration of the site to a safe standard and for the site to be put to uses appropriate to the High Weald AONB. Separation distance, in combination with the low level of activity proposed, controlled traffic movements and temporary nature of the project prevents harm to the setting of Standen House.

3. Summary

- 3.1 The application presents evidence that the former Standen landfill is a public health concern with the discharge of gas and leachate emissions to the wider environment. The existing restoration layer within the site is sparse and prevents the agreed agricultural after-use. This application is the result of the improper restoration of the site. The capping system and restoration layer proposed is the minimum level of engineering operations required to restore the site to a safe and usable condition. The intended end use is as woodland and native grass meadow. Agricultural activities are not viable given the topography and size of the holding.

3.2 The proposed scale of engineering works can be controlled by limiting the number of HGV movements to the site and the hours of operation. In turn this allows the required works to be compatible with the neighbouring uses and Grade I Listed Standen House. The submitted plans show the site has been designed professionally and can work to achieve the stated objectives. Once permitted, and through the discharge of pre-commencement conditions, a construction management plan will ensure adherence to strict operational guidelines during daily operations. The Environment Agency will also have regulatory control over the site, and ensure the correct controls are in place for safe operations. Policy supports the proper restoration of landfill sites and the control of pollution. The construction impacts of the proposal can be adequately controlled to avoid harm to neighbours during the construction phase. Planning permission is requested to allow the full restoration of the site to a safe standard.

