

From: [The National Trust](#)
To: [PL Planning Applications](#)
Subject: New comments for application WSCC/004/20
Date: 26 February 2020 16:09:46

New comments have been received for application WSCC/004/20 from The National Trust.

Comments:

The National Trust looks after coastlines, forests, woods, fens, beaches, farmland, moorland, islands, archaeological remains, nature reserves, villages, historic houses, gardens, mills and pubs. We restore them, protect them and open them up to everyone, because open space, nature and heritage are important in all our lives, provide a chance to relax, and opportunities to learn and improve our health. These are things everyone has the right to enjoy and what inspires us to carry on the work of our founders - we look after special places for ever, for everyone.

The National Trust submits the following additional objections to application WSCC/004/20, Evergreen Farm landfill.

The concern with the application is the lack of complete and detailed information in regard to a number of areas;

- lack of engagement and understanding of right of access across our land
 - Inadequate application detail and information
 - Lack of consultation and engagement with local stakeholders and affected landowners, i.e. the National Trust,
 - Unrealistic transport analysis and detail, and flawed highways assumptions,
 - Unacceptable impacts on our land and the operation of Standen as a National Trust visitor attraction,
 - Lack of heritage impact assessment on grade I listed Standen House and unrealistic summary assessment of impacts on the setting of it,
 - Unacceptable impact on the operation and viability of Standen and impact on our visitors, loss of income and effect on our business, and
 - Noise and tranquillity impacts.
- Access across National Trust land

Whilst notice has been served in regard to the applicant submitting an application that affects our land, the application fails as the applicant does not in our view have the right of access across our driveway to reach the public highway. The Planning statement erroneously states at para 1.10 that the lorries will;

"Exit left out of the southern end of Evergreen Farm onto short run of shared driveway (This is shared with Standen House)."

This driveway is wholly owned by the National Trust up to the highway boundary and there is no agreement for any 'shared' use of it for the proposed purpose.

The Evergreen Farm track access is not for movement of lorries or waste management. Previous use of this access in the 1990's for waste transfer does not confer any permissive right as the track has not been used for his purpose for at least 15 years.

The National Trust does not agree that the applicant has any right of access to use our drive (not a shared track) for anything other than normal agricultural purposes. Therefore the application fails as the means of access to the highway cannot be secured.

Highways

Please see the attached report regarding issues with the highway aspects of this application.

Additionally, the limited width of the West Hoathly Road, will prevent HGVs and cars passing each other without traffic management for which there is inadequate width. This will create unsuitable stoppages and blockages on this narrow road especially near the sandrock outcrops and other confine highway spaces.

There would be additional detrimental effects on the public transport links as the bus stop outside and adjacent the Standen entrance, will need to be moved to allow the lorries to turn left on exiting. This would also require the removal of hedgerow and habitat and disruption to the public

transport network. They have not sought our comments on the turning requirements to widen the apron or any other aspects of making this access point viable (notwithstanding our position that they do not have a right to use this access, for this purpose, in the first place.)

Environmental justification

The application claims to be for the proper management of the liability permitted by the County Council through the restoration of the site to a safe standard. However, there is insufficient information provided to understand what the actual current risks are.

In relation to the proposed development's assessment of contaminated land, a site investigation was undertaken by Geo-Environment dated September 2018. The report recommended that further investigations were needed to understand the risks to receptors, including further ground gas and leachate monitoring as well as the assessment of impacts on deeper groundwater (rather than water held within the waste mass). However, there are no further documents submitted with the planning application to demonstrate that these assessments were undertaken.

In addition, the desk study identifies an abstraction point (presumably from groundwater) approximately 200m to the south of the site, as well as a 'Well' being featured on the plans to the west of Beachwood House. Neither of these potential off-site groundwater sampling locations have been assessed within the contaminated land assessment. Additionally, no assessment has been made of the direction of groundwater flow. It was recommended that additional deep groundwater investigations should target locations at an upgradient to the site in order to assess the general background quality of groundwater within the area. There is no evidence that this has been undertaken.

In terms of surface water, there are details regarding assessment and sampling of the stream to the northern boundary of the site. However there are no details regarding the location of the sampling points. Therefore it is difficult to ascertain where elevated concentrations of PAHs were found and how this varies at points along the stream and in relation to leachate from the landfill. In addition, there is no sampling or assessment of the four surface water ponds that are located within 250m of the landfill area.

It is considered that the proposed remediation measures at the site have therefore not been supported with an updated risk assessment and site conceptual model, nor the risk to groundwater or surface water having been fully explored.

With regard to the quality of the discharge from the proposed outfall there are no detailed designs for the proposed water quality remediation system, including the surface water drainage blanket, the leachate collection blanket or the swales and wetlands. These components are considered to be a key part of the leachate management for the site. Cross sections of the site are provided, however they do not show the surface water / leachate blankets and how these would be formed and neither of these layers are featured on the Cap Construction plan (albeit it a 'typical' plan). The Below Ground Infrastructure plan shows a dotted line that indicates the position of the surface water drain, (the rationale for its location is not provided) and it does not illustrate describe how surface water is connected into the swale. Also there is a proposed culvert to the south of the landfill, there is no description of the purpose and connection of this culvert into the rest of the drainage system.

The report from Environmental Protection Group Ltd recommends several design aspects of the swale including length to width ratios, depths of water for deep and shallow zones, hydraulic retention time (> 24 hours) and possible installation of check dams. It is also recommended that the wetland is designed as an ecological feature, to be designed in conjunction with ecologists. There is no evidence of this within the design drawings of the site, only a planting scheme on the landscape plan.

Considering the lack of information on water quality treatment features and also no evidence of consultation with the Environment Agency regarding the proposed remediation designs, this gives no assurance that the proposed development would provide sufficient treatment to be acceptable to discharge nor that the new outfall location would be acceptable.

There are also concerns regarding the materials that are proposed to be used to create the capping layer. The typical cap construction shows topsoil and subsoils to be in line with British Standards specific grades and textures free from contamination, rubble and material injurious to plant growth. Layers below are described as Class 1/2/2A, described as granular fill of varying size and including

recycled aggregate, as well as a specific impermeable clay layer using a class 2A material (described as a wet cohesive material under this class). The application states that the soil will be inert recovered material sourced locally from construction sites and imported under a bespoke Environment Agency Recovery Permit. There are no assurances that the imported materials will be subject to strict assessment of the physical and chemical suitability for the proposed end use in order to ensure an effective capping system is installed as well as achieving the necessary slope stability.

It was noted that the application describes that the works may result in a change to the gassing regime beneath the site. Environmental Protection Group recommend and that a series of monitoring wells be installed around the outside of the landfill to a depth of 10m, with continuous monitoring to be undertaken before and during cap construction. There are no details of the installation of the monitoring wells on site plans nor do they feature on the Construction phasing plan. Geo-Environmental Ltd also recommend that further monitoring be undertaken following any remediation works to reassess the risk with respect to ground gases. No construction phase or longer term monitoring plans have been proposed for the site.

More complete and detailed information regarding this is essential to define the level of need that the site presents, to justify a major landscape and rural impact of the proposed land raising. It is not considered that an adequate, evidence case is made to justify the need for the development.

Heritage

Standen House is a grade I listed mansion and National Trust visitor attraction. It is not considered that the application provides sufficient heritage information or understanding of the setting of the listed building and will create significant harm to the setting and experience of the house and grounds.

The application notes that Standen House is 'several hundred meters away from the site' and that the 'house and 12-acre garden are separated by fields and woodland that prevent 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'.

This fails to understand the assessment of heritage setting and the impacts that the proposed HGV movements will have on the arrival at and experience of this tranquil heritage asset. The panoramic views and dramatic rock outcrops before the main property presents itself down the drive is a key part of the arrival experience at Standen and visitors' enjoyment of the property.

The arrival at and reveal of the heritage asset is fundamental to people's experience of it. These proposals would turn that experience from a tranquil arrival along a quiet country lane, approaching the secluded setting of the house in a remote rural location, to arriving behind HGVs crowding narrow country lanes, and queues forming as these large lorries struggle to turn out of the Evergreen Farm lane, into and across the Standen drive. This would potentially completely block the drive way into Standen, with associated risk and danger from lorry movements, noise, disturbance and mud, totally ruining and destroying the experience of the arrival and reveal of the heritage asset.

The application summarises the harm to the asset as follows;

'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.' (paraphrased)

It is not possible to claim that a major number of large HGV movements blocking and obscuring the drive way to the house and garden, can do anything but 'harm the asset, even though there maybe "mitigating" measures supposedly in place. Neither separation nor level of usage are relevant setting considerations - it is the impact on the experience of the heritage asset that is significant. In this case that impact is severe on the arrival at and experience of the reveal of the heritage site, and in this case the proposal will do irreparable harm to the setting of Standen House.

Any previous use does not set a precedent and all cases should be assessed on their merits. The application's claim that Evergreen Farm operated as a landfill during the 1990s, 'so is a recent operation that was deemed to have an acceptable relationship then' is neither relevant nor applicable to the current application. The application also states that most of the landfill was deposited in the 1960 and 1970s (Desk Top Study 1, Page 6 para 3.2) when Standen was not even open as a NT property.

Planning Practice guidance (18A-013-20190723) also notes that (my italics);

When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

The impact of the activity proposed will have a serious impact on the revenue from visitors, estimated to be at least 1M to 1.25. This will result in a major reduction in conservation work and future funding, including the ability to fund raise for additional income through match funding and will have a major deleterious impact on the conservation of this historic asset.

Tourism & business impact

As a conservation charity the National Trust generates income from its visitors in order to look after the places in our care. At Standen 95 per cent of our income depends on visitors coming to Standen, and many of them come from within 30 minutes travel time of the property, often visiting repeatedly during the year. The proposal as it currently stands would be greatly to our detriment as queues and delays entering the property would deter many of these vital local visitors and would immediately reduce our income. This would mean we have less money with which to carry out essential conservation work, and our visitors would have a poorer experience even if they safely overcame the traffic problems and reached the site. This would lead to fewer repeat visits and word of mouth recommendations. The impact would be dramatic and could last for many years. In addition to the immediate reduction in income there is a high risk of reputational damage to the National Trust, both at Standen and nationally.

Noise & Tranquillity

Table 5-2 of the Noise Impact Assessment shows that the predicted levels are expected to exceed the 55dB noise limit in all scenarios, whilst low this is a significant increase on current noise. This is further evidence of the level of noise and disturbance the activity will have and the impact of this on tranquillity in this quiet rural area. It is unreasonable to suppose that the movement of many HGVs and the associated noise and disturbance will not have a significant impact on this rural location. This may be considerable given the actual level and direction of travel of the HGVs. These impacts are severe in the locality as well as contributing to the impacts on the setting of Standen House.

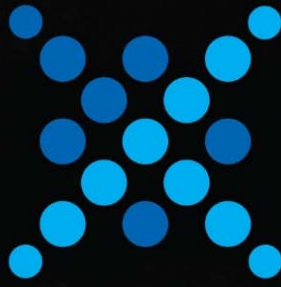
Summary

The application proposes a major operation requiring significant HGV movements in a sensitive and secluded rural location. However, the essential need for the operation (to control pollution and run-off) does not appear to be fully justified or clearly set out. The impacts of the proposal on rural tranquillity and local amenity are likely to be significant and the impacts on the setting of Standen grade I listed house are severe. The transport information is incomplete and misleading, and it is unclear what the actual level of vehicle movements will be. There are no access rights over Standen's drive for the proposed use. As noted in our previous representation already submitted, the proposed exit from the site is untenable. The likely impacts on Standen House as a visitor attraction itself and financial loss is acute and unacceptable, and contrary to planning practice guidance. That these proposals have come forward with no local consultation with residents or the National Trust, especially given the impacts on our business, as well as the heritage asset itself, is completely unacceptable.

The development as proposed fails to meet basic planning requirements, does not meet general planning policy, and by its impacts on the landscape, significant heritage assets and the environment, does not constitute sustainable development. Nor is the need for the development clear and unequivocal, and as such the proposal is unjustified in planning terms. Even if that justification is forthcoming, the impacts of it on local amenity, tranquillity, the National Trust business, and the heritage asset all argue very strongly against any grant of permission.

Please see attached transport statement in support of this objection

The following files have been uploaded:
20200221_10238 Standen House Highway & Transport Reviewt.pdf



HVJ TRANSPORT LTD

Highway & Transport Review Report

Former Standen Landfill

Evergreen Farm, East Sussex, RH19 4NE

PROJECT NO. P916

February 2020

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CONTENTS

1	Introduction	2
2	Planning Application for the Site	3
3	Local Highway Network	4
4	Review of Planning and Transport statement	5
5	Review of Stage 1 Road Safety Audit	7
6	Conclusions	8

Schedule of Appendices

A Planning and transport Statement

Issue	Issue date	Prepared	Checked	Authorised
1st	2020-02-21	ART	HVJ	HVJ

Prepared by: Andrew Tanner BSc, MCIHT

Checked by: Huw V Jones

Authorised by: Huw V Jones



1 Introduction

- 1.1 This Highway and Transport Review Report has been created in response to proposals for the restoration of the former Standen Landfill site with a woodland and pasture landfill cap system. A Planning a& Transport Statement has been produced by Fluid Planning for the proposed development. In specific this Transport review reviews the planning & transport statement.
- 1.2 The proposed development site is approximately 4.4 hectares (44,000m²) in area (including access roads) and is located near Standen House in West Sussex, Mid-Sussex District, RH19 4NE.
- 1.3 The landfill site was previously in use as a landfill before an application was made to reclaim the land for agricultural use on 1980-12-10 (GR/350/80). This was granted approval on 1981-03-02 and the present site is still used for agricultural purposes. The existing site is used as rough pasture and has adjacent equestrian and residential usage. The proposed new landfill cap has planning reference DM/20/0362.
- 1.4 The existing site layout is shown below in **Figure 1.1** with the approximate site boundary indicated in red.

Figure 1.1: Existing Site Location

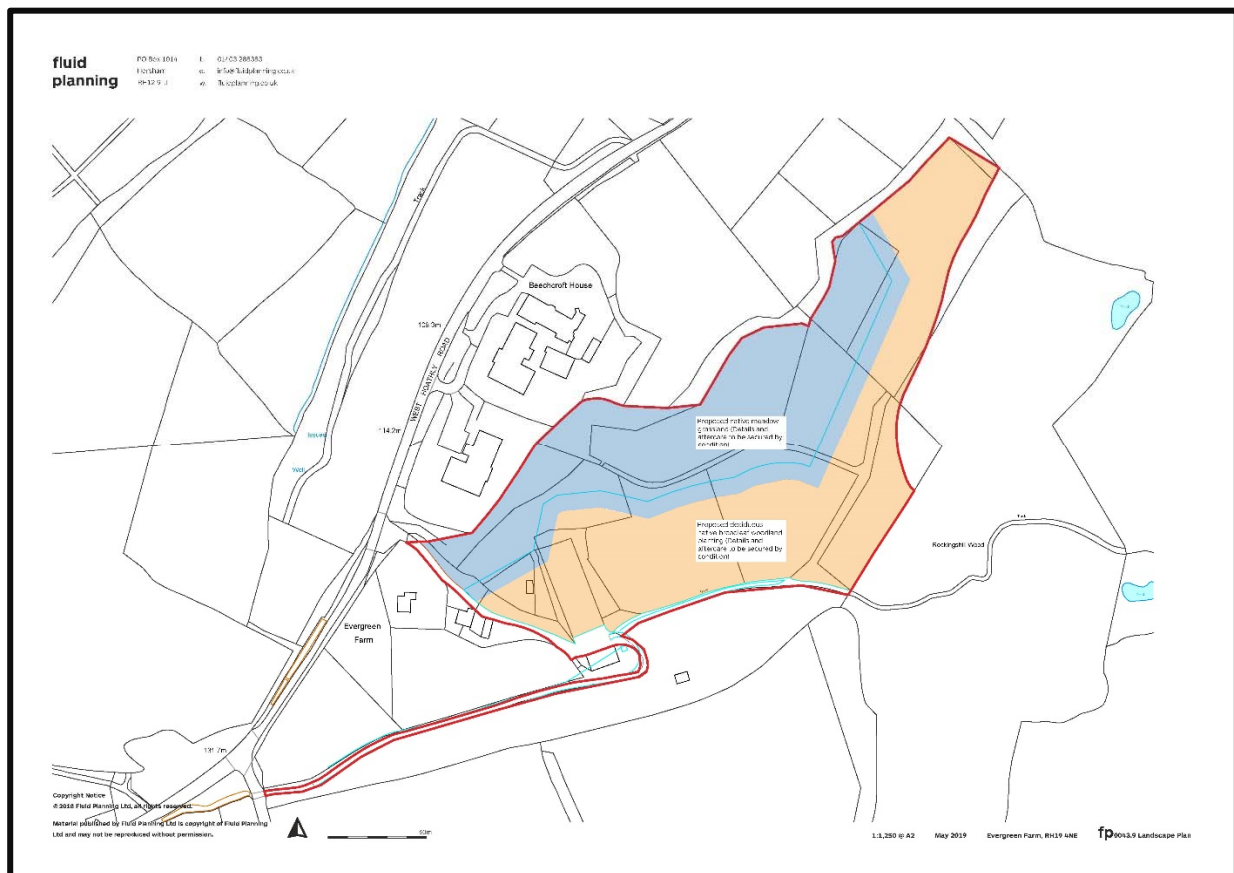




2 Planning Application for the Site

- 2.2 The development proposals are for the “Restoration of the former Standen Landfill site with a woodland and pasture landfill cap system”. This would cover approximately 4.4 hectares of land including access roads.
- 2.3 In specific this will involve the creation of a 1m thick layer of clay in a restoration layer or a 2m thick layer for areas intended to be regenerated as woodland. Around half of the ca area, located on the shallower slopes, will be planted with native broadleaf trees. The steeper sections are to be planted with native grasses. A degree of natural regeneration of woodland around the planted areas will be allowed to establish. Only 1m depth of restoration can be provided in steeper sections due to stability of banks.
- 2.4 In order to achieve this 120,000m³ to 150,000m³ of soil and clay is required for the proposed landfill cap. This figure is an estimate and more soil may be required.
- 2.5 The proposed final landscape plan is shown below in **Figure 2.1**.

Figure 2.1: Development Final Landscape Proposals

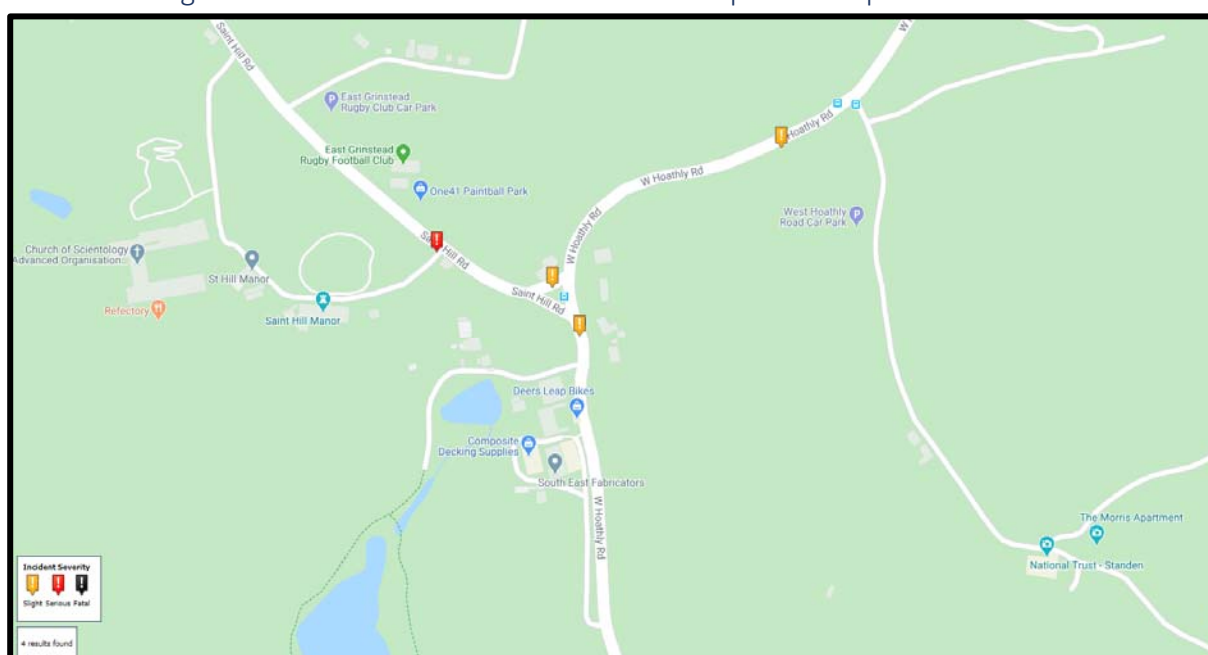




3 Local Highway Network

- 3.2 The closest roads to the proposed development site are West Hoathly Road and Saint Hill Road. Saint Hill Road runs from the Saint Hill/West Hoathly Road junction north to the B2110 and West Hoathly Road runs from the Sunnyside neighbourhood in East Grinstead to Weirwood Reservoir in the South.
- 3.3 In order to assess the road safety in the area Crashmap.co.uk was consulted to see the accident record for the area in the past 5 years (2014 to 2018). **Figure 3.1** below shows recorded accidents in the area.

Figure 3.1: Accident record for are of Development Proposals.



- 3.4 In the past 5 years there have been 4 accidents recorded in the vicinity of the proposed development site. 1 serious and 3 slight injury related accidents. This indicates that there is not an excessive amount of accidents in the area and the roads and junctions do not have any issues with poor design or excessive congestion leading to accidents.
- 3.5 Neither West Hoathly Road or Saint Hill are very large roads, they are both approximately 6m wide and are not designed for a large number of HGV movements. As the proposed development will require an expected 35 deliveries per day, movements routing and planning should be completed in advance of any vehicles arriving on site to avoid congestion. Peak hours (0800-0900 and 1700-1800) should be avoided for deliveries due to the busy nature of the roads in this period.



4 Review of Planning and Transport statement

- 4.2 A Planning and Transport statement was produced by Fluid Planning in support of the development proposals. This section is a review of the document produced. The Planning and transport Statement is contained in **Appendix A**.
- 4.3 There are a few issues not resolved in the Planning and Transport Statement that will require further information and there are some inconsistencies. The following paragraphs detail any issues and inconsistencies.
- 4.4 Paragraph 1.7 states that there will be a total of 120,000m³ to 150,000m³ of material required, some additional information on how this figure has been estimated would be useful. It is noted that additional soil may be required, and this is guide figure. If each HGV used can contain 10m³ of material, then the forecast 12,000 to 15,000 HGV deliveries is a good estimate on cumulative delivery demand. It is stated that a temporary portacabin will be provided for welfare facilities for workers, a plan indicating the location of this would be useful.
- 4.5 Paragraph 1.8 refers to drawing fp0043.11 which indicates areas which will be limited to 8-weeks per annum due to acoustic concerns. This is a reasonable proposal is feasible, the plan should have been provided in the report or as an appendix, but a version is contained on the planning portal for the proposed development. It is stated material will be stockpiled on site in advance, a plan should show exactly where materials are intended to be stored in addition to positions in which vehicles will have material loaded. These details may be provided at a later stage as part of a detailed construction management plan.
- 4.6 Operating hours as listed in paragraph 1.9 are appropriate.
- 4.7 Paragraph 1.10 states that there will be 35 deliveries per day. If:
- as stated in paragraph 1.7 each HGV carries 10m³ of material
 - as stated in paragraph 1.9 operating week will be a standard of 5 days, and
 - as stated in paragraph 1.8 there is expected to be 80 weeks required for all material to be important
 - This would work out as 140,000m³ of material to be transported in the 80 weeks which is consistent with the rest of the report.



- 4.8 Paragraph 1.10 states that deliveries to the site from the A22 by the following route, 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. This route is appropriate and does not conflict with any weight or height restrictions however given the narrow roads within East Grinstead town centre a more appropriate route would be through Herontye Drive as this will bypass East Grinstead town centre.
- 4.9 Paragraph 1.10 states that vehicle will exit by the following route, Exit left out of the southern end of Evergreen Farm onto short run of share driveway, turn left onto West Hoathly Road travelling to junction with Saint Hill Road, Travel North along Saint Hill Road to cross roads with B2110 and Imberhorne Lane, North along Imberhorne Lane to London Road. This route is considered appropriate.
- 4.10 In paragraph 1.11 it is started that a stage 1 road safety audit (RSA) has been completed for the routeing. The RSA was completed by EC Road safety in October 2019 but only covers the site access and not the routeing. The RSA should have been included as an appendix and also should have a designer's response to explain how issues have been addressed. A S59 agreement to cover any damages is appropriate as is signage for users and briefing of drivers before going to site.
- 4.11 Paragraph 2.11 and 2.12 contains details of traffic counts on Saints Hill Road and West Hoathly Road, however details about the survey are not provided. It needs to be clarified when the survey took place, who undertook it and the full survey results should be included as part of the report or in an appendix. The conclusions on HGV movements are valid but the traffic survey data is required to verify this.
- 4.12 Paragraph 2.13 states that restricted hours for HGV to avoid peak hours is a possibility, this recommendation should be pursued to avoid peak traffic hours (0800-0900 and 1700-1800) to avoid conflict and potential congestion.
- 4.13 The one-way routing for HGVS outlined in paragraph 2.15 is appropriate and if implemented as specified will avoid conflict of HGVs arriving and departing. All drivers and on-site staff should be briefed on this in advance.



- 4.14 Paragraph 2.16 refers to drawing fp0043.10 showing the swept paths for HGVS accessing and egressing the site as per RSA1 guidance. The drawing does not clarify what the outlines of the vehicle track refer to, presumably the green is the body outline and the red is the wheel outline. This drawing should be updated to clarify this. The vehicle profile supplied does not contain any dimensions, this should be provided with any swept path analysis. Assuming the above is correct then the swept paths shown demonstrate the entry and egress manoeuvres are acceptable. An updated drawing showing the vehicle profile with dimensions and what the swept path outlines indicate should be provided.

5 Review of Stage 1 Road Safety Audit

- 5.2 A stage 1 Road Safety Audit (RSA) was carried out on the proposed access arrangements for the proposed development. This was completed on the 17th of October 2019 by EC Road safety and was issued on 18th October 2019. The RSA should be included as an appendix to the planning and transport statement.
- 5.3 No designer's response has been produced to address issues raised however the planning & transport statement has addressed many comments. A designer's response should still be produced to address how specifically all comments raised have been addressed.
- 5.4 The following issues were raised by the RSA1:
- 3.1.1, proposed exit onto West Hoathly Road. Vehicle tracking is required to be provided to demonstrate that there will be no overrun of the vehicle body that will conflict with any banks, bust stops or other features. Vehicle tracking shown in drawing fp0043.10 demonstrates this however the drawing needs to be updated to show vehicle profile indicators and also show full vehicle dimensions on the profile diagram.
 - 3.5.1, proposed exit onto (sic) Hoathly Road. Although a one way in and out system is proposed this does not currently have any proposed signage to ensure that 2 HGVS do not have a sideswipe collision Signage should be provided to ensure HGV sideswipe collisions do not occur. The locations of signage should be set out specifically on a plan of the area along with TSRGD designation for signage. Whilst paragraph 1.11 mentions signage will be provided full detail is still required.
- 5.5 A designer's response should be provided for the RSA1 though details covering issues raised have been provided within the planning and transport statement.



6 Conclusions

- 6.2 The proposed development is for a cap layer to be provided on top of an existing landfill area which is now in use as agricultural land. The proposals are for a cap layer to be installed to prevent contamination and ensure the surface of the landfill is impermeable and material is not breaking through at the surface.
- 6.3 This will be achieved by providing approximately 150,000m³ of material for the construction of the new cap layer. Material will be taken to the site by HGVs with an estimated 35 vehicles per day making deliveries over an 80-week period.
- 6.4 Further information is required for the proposed development site in order to approve the Planning and Transport Statement as listed in Section 4. The following information will need to be provided:
- Full results of traffic survey undertaken on West Hoathly Way and Saint Hill Road including, date of survey, time period covered, who undertook the survey. Full results should be included as an appendix
 - Swept path diagrams should be updated to contain a key explaining what the swept path colours represent and full vehicle profile dimensions
 - Full details of signage including, location and TSRGD designation should be provided.
 - A designer's response to the RSA1 should be produced and included as an appendix.
- 6.5 An updated Planning and transport Statement should be submitted addressing the above information.

- End of report –



Appendix A

Transport and Planning Statement completed by Fluid Planning

fluid planning

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

**Planning & Transport Statement
0043**

Contents

3	Introduction
7	Planning considerations
15	Summary

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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.

