TABLE ES 1 - A summary of the issues raised in the Scoping Opinion and how the issues have been addressed in the Environmental Statement

CONSULTEE	ISSUE RAISED / COMMENTS	LOCATION WHERE ADDRESSED IN THE ENVIRONMENTAL STATEMENT PLUS COMMENTS
West Sussex County Council	**Landscape and Visual Impact Assessment** LVIA in accordance with the Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3)	In accordance with GLVIA3
	The reliance on a 1.5km study area should be clearly set out to demonstratehow it has been determined that the development would not be 'particularly obtrusive' in the landscape, and to quantify what that means. The Zone of Visual Influence (ZVI) should be established taking into account a 'worst case' for the development, including landforms, plant and buildings (CMRF building, offices, weighbridge, welfare facilities), and must include the full extent of the access road. It must also take into account the removal of trees which potentially currently screen it, and the impact of light from both lighting required on site and vehicles on the site, including travelling to/from it during winter.	See Sections 11 and 17 of the Environmental Statement along with Figures PS4.1 & 4.2, PS7, PS8.1 & 8.2, PS9.1 & 9.2, PS12, PS13, PS16, ES 2, ES 6 and Appendices ES H, ES O, ES P
	Final viewpoints should be agreed with WSCC's Planning Officers once the ZVI has been established.	The ZVTI was agreed with Chris Bartlett, Principal Planning Officer. See Figure ES 3
	The scope of the assessment should also include the visual impact, and impact on the landscape, of the increase in HGVs travelling to/from the site through the countryside. It should also consider the impact of the access itself, including the widened access opening up views into the site. It should also take into account the changes in land levels, when finalised at different stages of the development.	As above
	If bunds are to be used to screen views into the site, the scale and location of these should be taken into account in terms of impacts on the surrounding area. Landscaping of the proposed bunds should be considered and detailed accordingly. Cross sections and topographical plans	As above. See also Figure PS5

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	of existing and proposed levels should be provided for all phases of the development.	
	It is likely that fencing will be required to enclose the site, and possibly along the route of the PROW to separate HGVs from those walking the paths. The impact of this on the landscape and visual amenity should be considered, and the type of fencing used carefully considered, given its rural location, and the long term nature of the project.	As above, see Figure PS7
	Similarly, the need for signage to be installed as part of the scheme should be identified at an early stage so that the landscape and visual impacts can be considered. It is likely this will be needed at the site entrance, along the PROW, and possibly along the local roads, so the extent of signage, and what would be required, should be clarified and its impact assessed.	As above
	At an early stage, it should be established whether site lighting would be required for operations and if so, the location and extent, so that this can properly be assessed in terms of the impact on this countryside location, both in terms of landscape and visual impacts.	As above. See lighting in Section 18 of the Environmental Statement
	The landscape character assessment should consider national, county and district level character areas, and make reference to associated guidance.	As above
	Further, a comprehensive landscaping scheme (including details of subsequent maintenance) should be included to minimise visual impacts on the locality and provide net gains for biodiversity.	See Figure PS7
	The intention to carry out a tree survey in accordance	

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	with BS5837: 2012 is noted and agreed. The results of this should feed into not only the conclusions regarding ecological impact, but also landscape and visual impact, given the loss of trees proposed and the resulting reduced screening of the site. The tree survey must include consideration of the requirement to create/maintain sight lines at the site access. Further consideration/detail should be provided regarding existing boundary treatment/vegetation and, where appropriate, the measures that are proposed to ensure its retention.	See Appendix ES O and Section 17 of the ES See Appendices ES H and ES P See Figure PS7. Note: the LVIA, the AIA and the landscaping plan were all produced by Land Vision South East Ltd so that these issues could be considered in the round
West Sussex County Council	**<u>Ecology and Nature Conservation</u>** It is agreed that an assessment should be undertaken in accordance with IEEM's 'Guidelines for Ecological Impact Assessment'. The assessment must consider not only the operational site, but the access road, which would run through ancient woodland. The loss of ancient woodland, and direct and indirect impacts on it (including root protection areas and hydrology) resulting from both the operational site and access road should be assessed, and biodiversity net gain demonstrated. As noted in the response from Chichester District Council (CDC), their records indicate the site has suitable habitats for bats and dormice, and it is within 200m of ponds, potentially providing habitat for Great Crested Newts. They also confirm that the site is not within or near any known flightlines for bats from Ebernoe Common SAC or the Mens SAC.	See Sections 11, 12, 13, 17, 18, 19 of the Environmental Statement along with Figures PS4.1 & 4.2, PS5, PS7,PS16, ES 4, ES 6, ES 7 and Appendices ES H, ES I, ES J, ES O, ES P, ES R, ES U and ES V and Tables ES 2 & ES 3 As above As above

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	As noted in the response from the Forestry Commission, the impact of the proposed access track on trees, roots and soil, particularly relating to ancient woodland, should be quantified, and compensated for, to ensure that there is a biodiversity net gain from the project.	As above. Development is not in ancient woodland.
	The ES should clearly specify the amount and type of compensatory planting that would be provided to replace the trees lost, particularly in the ancient woodland, and where the compensatory planting would be located.	As above particularly Sections 17 & 19 of the ES and Appendices ES P and ES V
	The ES should quantify the impact of increased disturbance in an otherwise tranquil location in the countryside on habitat and species beyond the site, including as a result of vehicles travelling on the new access road, and lighting on site.	See Section 13 of the ES and Appendix ES J
	The potential impact of dust emissions, noise, and surface water run-off from the site on ecology should be assessed.	See Section 18 of the ES and Appendix ES R
	The EIA should clearly identify how the works would enhance the ecological environment. This will be particularly important given the loss of a mature tree belt, part of the quarry from the final restoration, and the resulting long term loss of habitat.	)
	An Ecological Management Plan should be provided, setting out how enhancement will be secured and maintained throughout the lifetime of the development.	) See Section 19 of the ES and Appendix ES V
	The final restoration proposed should be updated	

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	to reflect the most recent understanding of beneficial habitat creation and environmental benefits.	)
West Sussex County Council	**<u>Archaeology and Cultural Heritage</u>** The proposal to prepare a desk based assessment of the site to identify the presence and significance of any potential archaeological remains within the site is welcomed and appropriate	See Sections 11, 13 and 15 of the Environmental Statement along with Figures PS9.1 & 9.2, PS13, ES 2, ES 3, ES 5 and Appendices ES H, ES J and ES L
	A search should be made of the three relevant Historic Environment Record databases (Chichester District Council, West Sussex County Council, Surrey County Council), and the findings incorporated and taken into account in the desk based assessment.	As above
	An aerial LiDAR survey of the site (Digital Terrain Modelling, which can filter out trees, and if of sufficiently high resolution show earthworks on the bare earth below tree cover) and access route options is strongly recommended. The LiDAR imagery, with interpretation by a suitably qualified archaeologist, should form part of the desk based assessment.	As above, Environment Agency LiDAR data used
	An archaeological walkover survey of the site and access route options should also form part of the desk based assessment. There should be illustrations to show which areas were accessible and walked through; where inspection of woodland is possible only from woodland tracks and rides, this should be made clear. The green lane bounding the site on the north-east (Public Footpath 792/1) is a feature of historical landscape interest; earthworks, such as boundary banks, associated with the lane should be identified in the walkover survey.	As above

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	Potential mitigation measures to minimise any archaeological impacts should also be included in the desk based assessment and/or chapters of the EIA addressing mitigation of scheme impact. It is considered likely that the conclusion that the development would have no visual impact on Listed Buildings is correct. As part of the desk based assessment, the locations of Listed Buildings within 2 km of the site should be shown on a map. Consideration should be given, in detail, of the potential scheme impacts upon the setting of the Grade II Listed Pephurst Farmhouse (visual, noise impacts, from the site and use of the access). The need for mitigation measures should be identified, as should the impact of features such as bunds and stockpiles. The expected impact of the scheme, including both the operational area and access, upon Listed Buildings at much greater distance, should be referred to in summary. More detail should be provided in relation to the potential impact of increased noise and vibration on Listed Buildings adjacent to affected main roads.	As above see Wessex Archaeology section of Appendix ES L As above, see appendices ES H and ES J As above see Appendix ES J
West Sussex County Council	**<u>Noise and Vibration</u>** A new access road would be created, so the impacts of that must be identified, including the new access point which would be created opposite a residential property (Pephurst Farm), in close proximity to Ivyhurst to the east.	See Sections 10 and 13 of the Environmental Statement along with Figures PS12, PS13, PS14, ES5 and appendices ES E, ES J and ES R. The access road and access point is not new.

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	The noise and disturbance caused by the increase in HGVs travelling on the local roads linking to the local lorry route should also be quantified. The assessment of noise impact should be based on a 'worst case scenario', with plant, particularly the crusher, operating simultaneously alongside extraction plant, the screener, and vehicles travelling to/from the site. Plant specifications should be identified in the submission. A Noise Management Plan should be submitted with the application. This should clarify any measures relied upon to reduce noise impacts. Noise-sensitive receptors should be agreed with CDC's EHO's and should include the closest residential receptors relative to the operational site and access road, as well as representative public rights of way.	See above Worst case approach taken to include air extraction and Air filtration from the CMRF building even though this will be replaced by Mist-Air. On site electricity generator included even though this will only be short term To be based on the Mitigations specified in Section 13 of the ES and Appendix ES J. These were agreed.
West Sussex County Council	**<u>Air Quality</u>** While the operational site is relatively distant from residential properties, it abuts ancient woodland, the proposed access road would run through ancient woodland, and as a greenfield site, has the potential to significantly affect habitat and species, including through air quality impacts. This should be quantified through an air quality assessment, including the cumulative impacts of site operations and traffic movements. Measures to minimise the impact of the works on air quality should be set out, including measures to minimise dust and prevent the tracking of mud/debris	See Sections 10 and 18 of the Environmental Statement along with Figures PS14, ES 7 and appendices ES E, ES G, ES Q, ES R, ES S and ES T. See above.

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	onto the road, which may also cause impacts offsite. The assessment should take into account Air Quality and Emissions Mitigation Guidance for Sussex (2019), which requires increased emissions to be avoided, mitigated, or offset. A damage cost calculation will be required with the submission, along with a mitigation plan to offset the impacts, which should feed in to the Air Quality section of the ES.	See above, Section 18 of the ES and Appendix ES Q
West Sussex County Council	**<u>Hydrogeology and Hydrology</u>** The Flood Risk Assessment prepared to inform the ES should be undertaken in accordance with the West Sussex LLFA policy for the Management of Surface Water. The assessment of impact on the water environment must be prepared to consider all aspects of the development (mineral extraction, recycling facility, and restoration phases), and should consider surface water and ground water. As noted in the response from WSCC Drainage, the proposed development site incorporates the catchment for a section of the Wey and Arun canal, with significant flow paths feeding the canal. The canal has been associated with historic flooding so the Hydrology section of the ES, as informed by the Flood Risk Assessment and Drainage Strategy, must demonstrate that the approach being taken with regard to tree removal and stripping of topsoil would safeguard against any increases in surface water flow routes from the development area to the downstream catchment. Property flooding has occurred to properties in Burley Close to the south-west of the site so the ES must	See Section 12 of the Environmental Statement along with Figures PS5, PS7, PS8.1 & 8.2, PS9.2, PS11, ES 4, and appendices ES I and ES M. No groundwater was detected. As above As above

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	demonstrate that it would not result in increased flood risk to properties at Burley Close, as well as other properties adjacent to the Loxwood Stream. The EA's comments are noted in relation to the potential need for an abstraction licence is dewatering is required. If this is the case, it should be clarified in the submission, and relevant mitigation measures managed through other regulations identified. Consideration of surface water drainage should include potential impacts on public rights of way as a result of both the operational area, and the new access road.	 No water abstraction See above
West Sussex County Council	**<u>Soil Resources</u>** As noted in the comments from CDC's EHO, as well as the EA, the scope of the assessment should be widened to include consideration of potential effects from land contamination, and effects on soil resources. Appendix 5 (historical land uses) notes that the area has supported brick making and firing in the past, so there may have been localised infilling of pits. A Phase 1 Contaminated Land Assessment should therefore be undertaken, to identify signs of legacy contamination (or recent contamination associated with fly tipping) with the results feeding in to the ES, and identifying the need for further work if necessary. Measures to prevent pollution of soil and water resulting from the waste facility should be clearly set out. It is particularly important that the impact on soils within and immediately next to the ancient woodland is	 See Sections 12, 14, 15 and 16 of the Environmental Statement along with Appendices ES I, ES K, ES L and ES M. See Section 14 of the Environmental Statement and Appendix ES K. No further work required. See Sections 4, 5, 6, 7, 12 and 16 of the Environmental Statement and Appendices ES I and ES M See Section 19 of the Environmental Statement and

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	quantified, and where necessary compensated for as this is irreplaceable, as noted in the Forestry Commission's response.	Appendix ES V
West Sussex County Council	**Traffic** The scope and methodology of the Transport Assessment should be agreed with WSCC Highways. As well as an average number of HGV movements, the maximum number should be made clear, so a 'worst case scenario' can be considered. The extent of works required to create the new access onto Loxwood Road should be specified early, including visibility splays and signage, so that the visual impact can be quantified. The routing of vehicles to/from the site should be clarified in the submission, and a mechanism for securing this set out (e.g. routing agreement secured by S106), so the impact on local roads can be assessed. The impact of the site and new access road on users of the PROW network, as well as informal paths, should be quantified, and any compensatory works to the network and recreation set out. Consideration should be given to the need for legal agreements to secure changes to PROW routes.	See Section 10 of the Environmental Statement along with Figures PS2, PS9.1 & 9.2, PS13 and PS14 and appendices ES E, ES F and ES G. Minimum and maximum vehicle movements specified. See appendices ES E & ES F, including Stage 1 Road Safety Audit See Section 10 of the ES, Section 106 Routing Agreement To the A281 at Bucks Green proposed. See Section 10 of the ES and Figures 9.1 & 9.2 and ES 2 Proposed change to foot paths 792_1 and 795, which do not cross the public highway within the development site.
West Sussex County Council	**Cumulative Effects and In Combination Effects** The cumulative impacts of the development should take into account approved and allocated development within at least a 5km radius of the site, and consider the potential combined impacts of the proposals. In addition, the ES should consider and assess the impact of potential for in combination effects, whereby,	See Section 9 of the Environmental Statement. No further Cumulative effects were identified within 5km of the site. The existing waste activity at the former Rudgwick Brick Works is now coming to a close and the recent planning Application submitted by Restoration for Agriculture is not considered to provide any cumulative effects. In combination effects were considered post mitigations

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	for example, noise and air quality emissions can together result in a greater impact than they would separately.	but none could be identified that would provide a greater impact than they would separately.
West Sussex County Council	**Socio Economic Impact** The socio-economic impact of the project, over its proposed lifetime, should be clearly set out, including the likely source of employees (i.e. whether specialist contractors are required, or if the local population is likely to have the relevant skills), and how many would be required.	See Parts 1 & 2 and Section 20 of the Environmental Statement. Employees will be local and where necessary Training will be provided.
West Sussex County Council	**Alternatives** Alternatives should include the exclusion of the waste Processing operation; and the extraction of clay from other sites in the County. It is unclear where the clay from the site would be taken to for brickmaking, but it should be made clear why the use of clay from this site would be preferable.	See Sections 7 & 8 of the Planning Statement and Section 8 of the Environmental Statement along with Figure ES 1
West Sussex County Council	**Climate Change** The impact of the project on climate change should be included (e.g. greenhouse gas emissions, loss of trees and carbon sequestration), as well as the impact of climate change on the project (e.g. increased surface water runoff/flooding, increased dry periods, loss of habitat), particularly given its 31 year duration, and the distance to brick making facilities. It is considered that Population and Human Health, Risk Of Major Accidents / Disaster and Heat and Radiation are unlikely to represent the main or significant environmental effects and they can be excluded from the Environmental Statement	See Sections 12 and 21 of the Environmental Statement along with Appendix ES I
Chichester District	Letter dated 6 March 2020 raised the following issues: • Noise management plan	All of these issues have been addressed in the West

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Council	• Land contamination and soil resources • Air quality assessment • Ecological survey • Archaeological survey • Arboricultural impact assessment • Flood risk assessment • Climate change	Sussex County Council (WSCC) sections set out above
Environment Agency	Letter dated 13 March 2020 raised the following issues: • Hydrological risk assessment • Phase I ground investigation for contaminated land • Surface water drainage strategy • Water abstraction • Storage of oils and chemicals • Method of working • Development phasing • Restoration • Aftercare • Future landscaping • Wheel washing • The development may require an environmental permit	All of these issues have been addressed in the WSCC sections set out above or are covered in Parts 1 & 2 of the ES
Forestry Commission	Undated letter sent by email only raised the following issues: • Government policy for ancient woodland • Ancient woodland and PAWS site concerns, especially with regards to impacts on root systems and hydrology. • Track widening in ancient woodland • Compensatory planting • Standing advice on ancient woodland and Planning Practice Guidance	See the WSCC sections above. No felling will take place in the ancient woodland Track widening is limited to two short 20m long sections Compensatory planning is provided as part of the Mitigations and enhancements for biodiversity. See Sections 17 and 19 of the ES and appendices ES P and ES V for more details.

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Loxwood Parish Council	Undated document raised the following issues: • PROWS and public safety • Traffic and road infrastructure – Class C road • Ancient woodland in north western corner • Ecological impacts	All of these issues have been addressed in the WSCC sections set out above. A Stage 1 Road Safety Audit has been carried out. The width of Loxwood Road has been surveyed from the junction with the B2133 to the junction with the A281. Appendices ES P, ES U and ES V address the ancient woodland and ecology issues, which are summarised in Sections 17 and 19 of the ES
Natural England	Their letter dated 17 February 2020 stated: • In error that the development is less than 5ha • EIA Regs • Annex A advice EIA Scoping Requirements	All of these issues have been addressed in the WSCC sections set out above or are covered in Parts 1 & 2 of the ES
Southern Water	Their letter dated 19 February 2020 stated: • Environment Agency should be consulted • WSCC should comment re drainage • Any development should consider any sewer discovered during construction works	All of these issues have been addressed in the WSCC sections set out above.
County Arbori'ist	Email dated 19 February 2020 stated: • A full ecological appraisal is required, and • A tree survey in accordance with BS5837:2012 • The whole of the western and eastern plot should be considered for impacts • LVIA must be carried out by a qualified landscape architect	All of these issues have been addressed in the WSCC sections set out above. Appendices ES P and ES V cover the wider area. The LVIA was carried out by a qualified landscape architect.
WSCC Flood Risk Engineer	Letter dated 21 February stated: • A flood risk assessment is required • Drainage strategy required	See Section 12 of the ES and Appendix ES I
WSCC County Archaeologist	Email dated 4 March 2020, contents of which are covered in WSCC's Scoping Opinion	All of these issues have been addressed in the WSCC sections set out above.